

**CABINET: THURSDAY, 17 DECEMBER 2020 at 1.00 PM**

---

A Cabinet Meeting will be held as a Remote Meeting on 17 December at 1.00 pm

---

**A G E N D A**

- 1 Minutes of the Cabinet meetings held on 19 and 26 November 2020 *(Pages 3 - 4)*

**Leader**

- 2 Cabinet Response to Policy Review & Performance Scrutiny Committee report entitled Scrutiny Impact Assessments *(Pages 5 - 12)*
- 3 Welsh Government Consultations On Draft Regulations For Corporate Joint Committees And Strategic Development Plans *(Pages 13 - 50)*

**Clean Streets, Recycling & Environment**

- 4 Cardiff Heat Network Special Purpose Vehicle - Full Business Case Approval *(Pages 51 - 136)*

**Education, Employment & Skills**

- 5 School Organisation Planning: Primary School Places to Serve Cathays and Parts of Gabalfa, Heath, Llandaff North and Plasnewydd *(Pages 137 - 196)*
- 6 School Organisation Planning: 21st Century Schools (Band B): Redevelopment and Expansion of Cathays High School *(Pages 197 - 272)*

**Finance, Modernisation & Performance**

- 7 Anti Money Laundering Policy *(Pages 273 - 316)*
- 8 Corporate Risk Management - Quarter 2 2020/21 *(Pages 317 - 352)*
- 9 Calculation of Council Tax Base 2021/22 *(Pages 353 - 372)*
- 10 Performance Mid Year Assessment *(Pages 373 - 524)*

**Investment & Development**

11 Atlantic Wharf Masterplan (*Pages 525 - 756*)

12 Annual Property Plan (*Pages 757 - 786*)

### **Strategic Planning & Transport**

13 Llandaff Conservation Area Review (*Pages 787 - 862*)

14 Local Air Quality Management - Annual Air Quality Progress Report (*Pages 863 - 1024*)

15 Endorsement of Second Review of South Wales Aggregates Regional Technical Statement (*Pages 1025 - 1184*)

### **PAUL ORDERS**

Chief Executive

**This document is available in Welsh / Mae'r ddogfen hon ar gael yn Gymraeg**

**CARDIFF COUNCIL  
CYNGOR CAERDYDD**



**MINUTES**

---

CABINET MEETING: 26 NOVEMBER 2020

---

Cabinet Members Present: Councillor Huw Thomas (Leader)  
Councillor Peter Bradbury  
Councillor Susan Elsmore  
Councillor Russell Goodway  
Councillor Graham Hinchey  
Councillor Sarah Merry  
Councillor Michael Michael  
Councillor Lynda Thorne  
Councillor Chris Weaver  
Councillor Caro Wild

Observers: Councillor Emma Sandrey  
Councillor Keith Parry  
Councillor Adrian Robson

Also:

Officers: Paul Orders, Chief Executive  
Chris Lee, Section 151 Officer  
Richard Crane, For Monitoring Officer  
Joanne Watkins, Cabinet Office

Apologies:

**146 INDOOR ARENA PROCUREMENT**

**Appendices 1 – 15 of this report are not for publication as they contain exempt information of the description contained in paragraphs 14 and 16 of part 4 and paragraph 21 of part 5 of Schedule 12A of the Local Government Act 1972.**

The Cabinet received an update of the procurement process to secure a private sector partner to deliver and operate a new Indoor Arena at Atlantic Wharf, Cardiff Bay.

**RESOLVED:** That the public be excluded from the meeting at this point during consideration of this item as the Cabinet discussed exempt information of the description contained in paragraph 14, 16 and 21 of Schedule 12A of the Local Government Act 1972. The public may be excluded from the meeting by resolution of the Committee

pursuant to Section 100A(4) of the Local Government Act 1972 during discussion of this item.

**RESOLVED:** that

1. the Preferred Bidder developer/operator consortium as identified in Confidential Appendix 1 for the development and operation of a new Indoor Arena and Travelodge Hotel at Atlantic Wharf, Cardiff Bay be appointed
2. Agreement be given to enter into a Pre-Contract Service Agreement (“PCSA”) with the Preferred Bidder including approval of the associated cost underwrite as set out in Confidential Appendix 2 (Section 8), subject to Confidential Appendix 15.
3. Authority be delegated to the Director of Economic Development in consultation with the Cabinet Member for Investment & Development to negotiate Heads of Terms with the Preferred Bidder in relation to the Development Agreement and to return to Cabinet for approval alongside the Full Business Case in summer 2021.
4. Authority be delegated to the Director of Economic Development in consultation with the Cabinet Member for Investment & Development to complete the land acquisitions as set out in the land strategy attached at Confidential Appendix 3, including the negotiation and completion of the Agreement with ABP to release the restrictive covenant and permit the Arena to be built adjacent to the dock feeder in line with the Heads of Terms and independent valuations contained within the Appendices to this report; and the acquisition of the freehold interest in the former Pizza Hut site on Hemingway Road.
5. Authority be delegated to the Director of Economic Development in consultation with the Cabinet Member for Investment & Development to negotiate terms with Travelodge and to return to Cabinet for approval of an Agreement for Lease, or as necessary, serve notice on Travelodge to avoid Compulsory Purchase Order implications at the break date.
6. the obligations that will be placed on the Council when Cabinet considers the Full Business Case in the summer 2021 as set out in the Conditions Precedent document contained within Section F of Confidential Appendix 1 be noted
7. approval be given to the additional project budget as set out in Confidential Appendix 2 (Sections 6) to progress delivery of the Indoor Arena project to the next stage.

**CABINET RESPONSE TO THE REPORT OF THE POLICY  
REVIEW AND PERFORMANCE SCRUTINY COMMITTEE  
ENTITLED 'SCRUTINY IMPACT ASSESSMENT MODEL'**

**FINANCE, MODERNISATION AND PERFORMANCE  
(COUNCILLOR CHRIS WEAVER)**

**AGENDA ITEM: 2**

---

**Reason for this Report**

1. To set out the Cabinet's response to the report of the Policy Review and Performance Scrutiny Committee, entitled 'Scrutiny Impact Assessment Model'.

**Background**

2. As part of its 2019/20 work programme, the Council's Policy Review and Performance Scrutiny Committee established a Task and Finish Inquiry to review the impact of the Council's Scrutiny function to date and to develop a model to capture the benefits of scrutiny in the future.
3. On 11 March 2020, the Policy Review and Performance Scrutiny Committee resolved to agree the report of the Task and Finish Inquiry and to forward it on for consideration by the Cabinet at its earliest opportunity; however, the subsequent onset of the Covid-19 pandemic and related UK-wide lockdown meant that consideration of this report was delayed.

**Issues**

4. The report of the Policy Review and Performance Scrutiny Committee, entitled 'Scrutiny Impact Assessment Model', was received formally by the Cabinet on 17 September 2020, which agreed that a response would be prepared within the usual timescales (i.e. two Cabinet reporting cycles).
5. The report made a total of seven recommendations and a draft response by the Cabinet to each of these recommendations is set out in **Appendix A** to this report.
6. These recommendations, and the Cabinet's response to these, will assist in improving the Council's governance arrangements by embedding a

systematic approach to responding to recommendations emerging from Scrutiny Committees. This will also strengthen the Council's position in relation to the new performance and governance requirements set out in Part 6, Chapter 1 of the Local Government and Elections (Wales) Bill.

### **Reason for Recommendations**

7. To approve the Cabinet's response to the recommendations of the report of the Policy Review and Performance Scrutiny Committee, entitled 'Scrutiny Impact Assessment Model'.

### **Financial Implications**

8. There are no direct financial implications arising from this report, but if any additional unforeseen costs arise as a result of implementation then the funding source needs to be identified prior to implementation.

### **Legal Implications**

9. The Wellbeing of Future Generations (Wales) Act 2015 requires the Council to consider how its proposed decisions will contribute towards meeting the wellbeing objectives set out in the Corporate Plan. Members must also be satisfied that proposed decisions comply with the sustainable development principle, which requires that the needs of the present are met without compromising the ability of future generations to meet their own needs.
10. The Local Government and Elections (Wales) Bill, which was agreed by the Senedd on 18<sup>th</sup> November 2020, will, when it comes into force, introduce new performance and governance requirements for Councils (in Part 6, Chapter 1), involving self-assessments of performance. As noted in the body of the report (paragraph 6 above), the recommendations of this report should support compliance with the new legislative provisions as and when they come into force.
11. There are no other direct legal implications arising from the recommendations of the report.

### **HR Implications**

12. There are no HR implications arising from this report.

### **Property Implications**

13. There are no property implications arising from this report.

### **RECOMMENDATION**

Cabinet is recommended to approve the draft response to the recommendations of the Policy Review and Performance Scrutiny Committee report, entitled 'Scrutiny Impact Assessment Model' as set out in Appendix A to this report.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Paul Orders</b> <b>Chief Executive</b>
	11 December 2020

*The following appendix is attached:*

**Appendix A:** Cabinet Response to the Recommendations of the Policy Review and Performance Scrutiny Committee report, entitled 'Scrutiny Impact Assessment Model' (draft)

The following background paper has been taken into account:

[Policy Review and Performance Scrutiny Committee report, entitled 'Scrutiny Impact Assessment Model' \(May 2020\)](#)

[Local Government and Elections \(Wales\) Bill \(as passed, 18 November 2020\)](#)

This page is intentionally left blank

## APPENDIX A

### **Cabinet Response to the Recommendations of the Policy Review and Performance Scrutiny Committee report, entitled ‘Scrutiny Impact Assessment Model’ (draft)**

Recommendation	Cabinet Response	Lead Cabinet Member	Lead Officer
<p>1. That Cabinet <u>adopts this Model</u> for capturing the impact of scrutiny acknowledging that it represents early compliance with the self-assessment requirements set out in the forthcoming Local Government Election (Wales) Bill. This self-assessment has implications for each Scrutiny Committee, the Scrutiny Function, and for the Service Areas / Directorates accepting scrutiny recommendations that require implementation.</p>	<p>Accepted. The Cabinet supports the proposed implementation of the Model in order to support the self-assessment requirements of Part 6, Chapter 1 of the Local Government and Elections (Wales) Bill, which relates to the performance and governance of principal councils.</p>	<p>Cabinet Member for Finance, Modernisation &amp; Performance</p>	<p>Head of Performance &amp; Partnerships</p>
<p>2. That the <u>Scrutiny Function pilots the Model</u> developed by the committee to provide a framework and database on which a quantitative assessment of its impact on Council services can be captured and reported to Full Council annually. This pilot should be reviewed one year from implementation. In addition to the quantitative assessment a non-quantifiable</p>	<p>Accepted. This is a non-executive matter for the Council’s Scrutiny function; however, the Cabinet supports the implementation of the Model on a pilot basis for 12 months initially and would be interested in the findings of the assessment.</p>	<p>n/a</p>	<p>Head of Democratic Services</p>

Recommendation	Cabinet Response	Lead Cabinet Member	Lead Officer
assessment of scrutiny should add value to the overall evaluation of impact, embracing the achievements of all five scrutiny committees.			
3. An <u>extension of the governance arrangements</u> currently in place for responding to the recommendations of a scrutiny inquiry, to recommendations generated by the committee in correspondence following scrutiny of a matter at a formal committee. Cabinet is currently required to respond to scrutiny inquiry recommendations as soon as is practicable. Where a scrutiny committee is making a recommendation to a Cabinet Member, that recommendation will be stated clearly at the end of the letter. The Cabinet Member is requested to respond to the letter as a whole, and clearly indicate their response to any recommendations included as being accepted, partially accepted or rejected.	Accepted. The Cabinet welcomes the need for any recommendations arising from consideration of matters by Scrutiny Committees to be stated clearly in any correspondence from Chairs that is sent subsequently to Cabinet Members for a response.	All Cabinet Members	All Directors
4. That the Cabinet Office and Service Areas make arrangements to <u>track and report on</u>	Partially Accepted. The Cabinet believes that the responsibility for	Cabinet Member for Finance,	All Directors

Recommendation	Cabinet Response	Lead Cabinet Member	Lead Officer
<p><u>the implementation of accepted scrutiny recommendations.</u> A progress report on recommendations made via report or letter would be expected to be available for presentation to the scrutiny committee within 6 months of the report being approved by Cabinet.</p>	<p>tracking and follow-up reporting of the implementation of recommendations from Scrutiny Committees that have been accepted by the Cabinet/Cabinet Members should sit with the Council's Scrutiny function, with support where appropriate being provided by the Council's Corporate Performance team. However, the principle is accepted and the Council's performance reporting framework can support this process.</p>	<p>Modernisation &amp; Performance</p>	
<p>5. That <u>Directors are accountable for reporting progress</u> on the implementation of accepted scrutiny recommendations.</p>	<p>Accepted. This will be integrated as part of the Council's performance reporting framework, with Directors being responsible for monitoring and reporting on progress to implement any recommendations from Scrutiny Committees that have been accepted by the Cabinet/Cabinet Members. The relevant Cabinet Member and Director would attend Scrutiny Committee meetings to report back on progress against recommendations as appropriate.</p>	<p>All Cabinet Members</p>	<p>All Directors</p>

Recommendation	Cabinet Response	Lead Cabinet Member	Lead Officer
<p>6. That service area tracking of the implementation of accepted scrutiny recommendations needs to <u>integrate with the Council's planning and performance framework</u>. This will enable recommendations to be monitored and their successful implementation evidenced.</p>	<p>Accepted. This will be integrated as part of the Council's performance reporting framework, with Directors being responsible for monitoring and reporting on progress to implement any recommendations from Scrutiny Committees that have been accepted by the Cabinet/Cabinet Members.</p>	<p>Cabinet Member for Finance, Modernisation &amp; Performance</p>	<p>Head of Performance &amp; Partnerships</p>
<p>7. That Cabinet endorse and <u>support the development and branding</u> of this model as the Cardiff Scrutiny Impact Model for potential sharing as best practice with other public bodies, and other local authorities through a variety of scrutiny networks. This would be offered when the model has been fully piloted and evaluated.</p>	<p>Accepted. This is a non-executive matter for implementation by the Council's Scrutiny function; however, the Cabinet recognises the good reputation of the Council's Scrutiny function, which has been developed in the last 20 years and the positive impact and contribution made by Scrutiny to policy development and performance management within the Council.</p>	<p>n/a</p>	<p>Head of Democratic Services</p>

**WELSH GOVERNMENT CONSULTATIONS ON DRAFT  
REGULATIONS FOR CORPORATE JOINT COMMITTEES AND  
STRATEGIC DEVELOPMENT PLANS****LEADER (COUNCILLOR HUW THOMAS)****AGENDA ITEM: 3**

---

**Reason for this Report**

1. To set out Cardiff Council's response to the Welsh Government's consultations on Regulations to establish:
  - Corporate Joint Committees (CJCs), including one for South East Wales (Cardiff Capital Region); and
  - the procedure for Strategic Development Plans (SDPs) to be prepared by CJCs.

**Background**

2. The Welsh Government is currently consulting on draft Regulations to establish four regional CJCs across Wales, including for South East Wales (also known as the Cardiff Capital Region). The establishment of CJCs is an integral feature of the Local Government and Elections (Wales) Bill, which has completed its passage through the legislative process in the Senedd and is expected to receive Royal Assent in the New Year, with several provisions commencing from 2021-22.
3. The Welsh Government is seeking views on the content of the draft Regulations, including the geographical areas; functions to be exercised; core governance, constitution, finance and funding arrangements, and provisions for staffing and workforce, including the appointment of executive officers. The closing date for submissions in response to the consultation is 4 January 2021.
4. The Welsh Government is also consulting concurrently on the policy intent for Regulations, to be known as The Town and Country Planning (Strategic Development Plan) (Wales) Regulations 2021, which would establish the procedure for Strategic Development Plans (SDPs) to be prepared across Wales by the four CJCs, including South East Wales (Cardiff Capital Region). The closing date for submissions in response to the consultation is also on 4 January 2021.

## Issues

### Local Government and Elections (Wales) Bill Part 5: Corporate Joint Committees

5. Part 5 of the Local Government and Elections (Wales) Bill provides for the establishment, through regulations, of CJs by two routes:
  - at the instigation of two or more principal councils, which can request that Welsh Ministers make regulations establishing a CJC for their areas in relation to any of the functions they exercise; or
  - at the instigation of Welsh Ministers, who can establish a CJC to exercise functions without a request from principal councils, but only in relation to certain functions or functional areas which are specified in the Bill.
6. In accordance with the second route set out above, the Welsh Government is proposing to establish four CJs by April 2021, which will cover the existing regional footprints for City/Growth Deals in South East Wales (Cardiff Capital Region); South West Wales; North Wales and Mid Wales.
7. From a Cardiff perspective, the South East Wales CJC region reflects the existing Cardiff Capital Region (CCR) and includes the 10 principal councils of Blaenau Gwent; Bridgend; Caerphilly; Cardiff; Merthyr Tydfil; Monmouthshire; Newport; RCT; Torfaen and Vale of Glamorgan, as well as the Brecon Beacons National Park Authority in relation to strategic planning matters. The constituent principal councils will also be able to invite participation by partners from other sectors in the work of CJs through a process of co-opted membership. These CJs will exercise functions relating to:
  - Strategic Development Planning;
  - Regional Transport Planning; and
  - A power to do things to promote or improve the economic well-being of their regions.
8. Once established, and where the constituent principal councils wish them to, CJs would be able to exercise other functions in the future. Any future transfer of other functions would be subject to further consultation and any necessary legislation at that time.
9. CJs will also be treated as a 'public body' and will also need to fulfil various statutory duties under existing legislation (e.g. Well-being of Future Generations (Wales) Act 2015; The Equality Act 2010; Welsh Language Standards; The Environment Act 1995; The Environment (Wales) Act 2016 (Section 6) and Children and Families (Wales) Measure 2010. The Minister has previously committed to providing support for local government in establishing CJs (e.g. support in the transition process and assistance with set up costs in the short term). The Welsh Government intends to continue to work with local

government in the implementation of the Establishment regulations and development of any guidance to CJsCs.

### Establishment Regulations

10. The Welsh Government is consulting on draft Regulations for the establishment of CJsCs in four areas, referred to the 'Establishment Regulations', which include specific regulations for the Cardiff Capital Region. These provide the core constitutional structure for establishing CJsCs and will be underpinned by further detail in the Regulations of General Application, which will apply generally to all CJsCs, setting out the detail of their governance and administrative arrangements and the legislative framework within which they will operate. The Establishment Regulations cover the following areas, which are summarised below:

### Functions to be exercised by CJsCs

11. The Establishment Regulations set out the following functions which all 4 CJsCs will exercise in the first instance:
  - Preparing, monitoring, reviewing and revising of a Strategic Development Plan (SDP) – CJsCs will be expected to commence delivery of these functions as soon as is reasonably practicable and as soon as the procedural regulations are made. Principal councils will retain their existing function of preparing Local Development Plans (LDPs). The Welsh Government is consulting separately and concurrently on regulations for preparing SDPs.
  - Developing a Regional Transport Plan (RTP) – the functions of developing policies for transport in, to and from the CJC area and developing policies for implementing the Wales Transport Strategy are set out in the Transport Act 2000.
  - Economic well-being function (i.e. the power to do anything which the CJC considers is likely to promote or improve the economic wellbeing of its area) – this will enable principal councils, should they wish, to evolve the current regional approaches to City/Growth Deals into the CJC structures.
12. It will be important to understand the implications of the transfer of the exercise of these functions in terms of staff and resources and to consider how the transfer of the functions can proceed in an efficient and effective way. For example, principal councils are currently responsible for developing Local Transport Plans (LTPs), and the function of preparing a transport plan will be transferred to each of the CJsCs to undertake on a regional basis through the preparation of a RTP.
13. Arrangements will need to be put in place to ensure an effective transition from local to regional arrangements. It may be that, in certain circumstances, the transfer of the exercise of a function and, therefore, the point at which the CJC is required to undertake that function, may be

later than the point at which the CJs are established. This would also allow for a period of implementation and for the CJC to establish itself.

#### Transfer of Other Functions to CJs

14. While the Bill provides for 'improving education' to be one of the functions that Welsh Ministers can specify that a CJC exercises, this function is not provided for in the Establishment Regulations. The constituent councils of the CJs may apply to Welsh Ministers to have this function (or any of their other functions) conferred on their CJC once the relevant provisions in the Bill enabling an application by principal councils to be made have commenced. As a result, there may be divergence in what each CJC does in the future. Any future proposals to add (including to omit or modify) principal council functions to a CJC would be subject to formal consultation.

#### Exercise of Concurrent Functions

15. In the case of the economic well-being power, and in relation to future functions that a CJC may exercise, it may be necessary for a CJC and its constituent councils to operate the powers concurrently. The CJC will need to agree a process with its constituent principal councils for agreeing how this might operate in practice including, but not limited to, the specific activities within the scope of the agreement, how agreement will be achieved, reviewed and how disputes may be resolved.
16. Arrangements for managing concurrent functions are not provided for in the regulations. This is a matter for each CJC in response to local and regional needs and is in line with the approach to enable flexibility and local determination where possible. The Welsh Government intends to provide guidance to CJs and its constituent principal councils on this matter.

#### Discharge of Functions

17. The Welsh Government wants to ensure that a CJC can arrange for the discharge of its functions as it sees fit, except where decisions cannot be delegated from a CJC. This could be through sub-committees, officers, other CJs, other principal councils and joint committees; some of which is covered by the Establishment Regulations. However, it is likely that much of the detail will be included in the Regulations of General Application.
18. CJs will be expected to have a scheme of delegation similar to that required of principal councils under section 101 of the Local Government Act 1972. The content of the scheme of delegation will be for the CJC to determine and it might include delegation to sub-committees, CJC members and/or staff appointed to deliver the functions of a CJC.
19. The Welsh Government considers that there are a small number of decisions which need to be made by the CJC itself. These include, for

example, the agreement of budgets; the adoption or approval of plans or strategies (including the Regional Transport Plan and Strategic Development Plan); and consideration of any reports required by statute. CJsCs will also have the power to do anything to facilitate, or which is incidental or conducive to, the exercise of their functions.

#### Governance and constitutional arrangements

20. Composition – each CJC will be comprised of a number of principal councils that, when combined, will form the area of the CJC. The CJC will be run by a committee of its members and it will be the CJC which will be responsible for delivering the functions exercised by it and taking the necessary decisions required to deliver those functions. A CJC will be accountable to its constituent principal councils and CJC members will report back to their principal councils and respond to questions and scrutiny. However, the CJC will have powers delegated to it and will make timely decisions without the need for ratification by its constituent principal councils.
21. Membership – CJsCs will comprise of the Leaders (senior executive members) of the constituent councils. The Leaders will decide whether additional representatives from the constituent councils or other organisations will be invited to be members of the CJC. The CJC will be able to co-opt such members to the CJC and determine/agree the terms of membership of any co-opted member (e.g. voting rights, role, funding contribution etc.).
22. Meetings – the Establishment Regulations require that each CJC must hold its first meeting by the end of September 2021. It will be possible for a CJC to meet as soon as the Establishment Regulations come into force, but CJsCs are not expected to be fully operational on day one as they need to take various decisions (e.g. election of chair & deputy chair; appointment of statutory officers) and implement governance & administrative arrangements. The frequency of meetings will be for each CJC to determine.
23. Voting arrangements – CJsCs will be established on a ‘one member one vote’ (OMOV) basis with decisions being taken by simple majority; however, CJsCs will have the ability to adopt alternative voting procedures should they wish to do so. If a vote is tied, the matter is not carried and the chairperson will only have the casting vote in decisions relating to the exercise of strategic planning functions. The Establishment Regulations provide a limit on the number of co-opted members with votes, but only in so far as that the number of votes which may be cast by co-opted members may not exceed the number of votes cast by council members (plus National Park Authority members on strategic planning matters). They also provide for a quorum of no fewer than 70% of the voting members.
24. Liability of members – CJsCs will be corporate bodies in their own right and the members will be taking decisions on functions which are theirs and theirs alone. As a result, in the event of any claim or legal action, it

would be inappropriate for liability to be allocated or apportioned to each constituent council. CJsCs should therefore be required to indemnify their members for the decisions they take. The CJC should hold the liability, rather than individual members, employees or others discharging functions on their behalf.

25. Sub committees – CJsCs will be able to establish sub committees if they wish to do so and decide who sits on them. These could consist of members of the constituent principal councils other than those members on the CJC itself (e.g. relevant Cabinet Members). Other partner organisations may also be invited/co-opted to be sub-committee members should a CJC wish to do so.
26. Scrutiny – each CJC will be required to put in place appropriate scrutiny arrangements (at the discretion of the CJC) and have an Audit and Governance Committee. Scrutiny committees are expected to not include a member of the CJC (or one of its sub-committees) and could include members (including non-executive members) of the constituent principal councils, whilst also taking account of political balance in the constituent principal councils.
27. Standing Orders and Code of Conduct – all CJsCs will be required to make standing orders for the regulation of their proceedings and business. They will also be required to adopt a Code of Conduct for its members and staff, and will fall within the future scope of the Public Service Ombudsman for Wales.

#### Funding of CJsCs

28. The Establishment Regulations do not prescribe any formula basis for funding of CJsCs. It will be for each CJC to decide how the budget requirement will be met by the constituent principal councils (and the National Park Authority in the case of the strategic planning functions). In the absence of unanimous agreement on the amount payable, the regulations provide for the amounts payable by the constituent councils and National Park member(s) to be directed by Welsh Ministers.
29. CJsCs will be the accountable body for the funding provided by constituent councils and/or directly received from any other funding streams. CJsCs will also be able to pay towards expenditure incurred or to be incurred in relation to carrying out its functions as it may determine, and to charge fees relating their specified functions. The regulations also enable CJsCs to provide assistance by way of grant or contributions to support functions exercisable by them. The funding from constituent principal councils will be held and managed by CJsCs and it is expected that they will be required to manage the funds under the same financial management arrangements as local government bodies in Wales.

### Finance and budgetary matters

30. CJsCs will be required to keep proper accounting records and to prepare annual accounts in accordance with Welsh Ministers' directions. They will also be subject to the usual checks and balances required of principal councils, including the financial duties and rules which require councils to act prudently in spending, which are overseen and checked by a Responsible Chief Finance Officer. CJsCs will also need to set their budget requirements by 14 February annually preceding the relevant financial year in order to align with the budget setting process of principal councils. In practice, the constituent principal councils will require the CJC to provide an indicative or provisional budget requirement to facilitate their own budget preparations.
31. In the first year of operation, CJsCs will not be able to set their budgets in this way and it may also be difficult for a CJC to ascertain what its initial budget may be, as this will depend on its ambition in exercising its functions in its first year. The Establishment Regulations provide a reasonable timescale in which to set the first year's budget requirement (i.e. within two months following the first meeting of the CJC– this would be by the end of November 2021 at the latest).

### Audit arrangements

32. The Regulations of General Application are expected to require that all funding decisions taken by the CJC will be subject to review through annual external audit. This will be in addition to the requirements on performance and governance set out in Part 6, Chapter 1 of the Local Government and Elections (Wales) Bill (e.g. self-assessment), which are also intended to apply to CJsCs.

### Staffing and workforce matters

33. The Establishment Regulations provide flexibility for each CJC to determine the approach it takes to staffing, including the ability to employ and recruit staff; make agreements to place staff at the disposal of other devolved Welsh Authorities and have staff placed at the CJC's disposal; and undertake secondments (in and out) to enable CJsCs to discharge their functions.
34. CJsCs will also be required to appoint a number of statutory "executive officers" similar to the roles within principal councils (e.g. Chief Executive, Chief Finance Officer, Monitoring Officer and Chief Governance Officer/Head of Democratic Services). The intention is for CJsCs to be able to directly employ, commission services or have relevant staff loaned from a constituent council to fulfil these roles as the CJC may determine. It is also intended that all executive roles within a CJC will be afforded the same statutory protection and indemnity as statutory officers within principal councils.
35. The provisions in law relating to staffing which apply to principal councils will also apply to CJsCs. These include TUPE and staff transfers; Trade

Union relations and standing orders relating to employment (e.g. procedures relating to the appointment/dismissal of officers and disciplinary action). Staff employed by the CJC are to be appointed on the same or similar terms and conditions (including remuneration) as officers appointed to one of the constituent councils undertaking substantially similar or the same responsibilities.

36. The Council's draft response to the Welsh Government consultation on Regulations to establish CJsCs is attached as **Appendix A** to this report.

### **Strategic Development Plans (SDPs)**

37. Provisions for the introduction of SDPs in Wales have already been established through the Planning (Wales) Act 2015. This also included provisions for the preparation of SDPs to be governed by bodies called Strategic Planning Panels (SPPs); however, the preparation of SDPs was not mandatory and no regions voluntarily commenced the process. The current approach of the Welsh Government, as set out in the Local Government and Elections (Wales) Bill, is to make the preparation of SDPs a requirement which must be delivered by CJsCs, in place of SPPs.
38. It is intended that SDPs will perform a more strategic approach than Local Development Plans (LDPs) by more effectively addressing issues that cross local authority boundaries. SDPs would therefore set out land use policy at a regional level and must conform with the National Development Framework (NDF), which sets planning policy across Wales.
39. Once SDPs are adopted for the 4 CJC regions in Wales, each Local Planning Authority (LPA) would still need to prepare LDPs; however, these would be more focused in nature, dealing with local issues and policies that must be in general conformity with the SDP. In this respect, the Welsh Government refers to these documents as LDP 'Lites' (LDPLs) and further consultation will be undertaken on Regulations for LDPLs ahead of them coming into force by spring/summer 2022.
40. Further guidance has been issued by the Welsh Government on the scope of SDPs as part of the Development Plans Manual (March 2020). It is also proposed that the Welsh Government will consult and engage with CJsCs/LPAs and key stakeholders on guidance relevant to the preparation of an SDP prior to publication. In addition, a revised Development Plan Community Guide setting out the Development Plan hierarchy, preparation process and timings/methods of engagement will be published by the Welsh Government in summer 2021.
41. The scope of the current Welsh Government consultation is therefore limited to seeking feedback on the policy intent of the SDP Regulations. Proposed responses to the specific consultation questions are set out in **Appendix B** to this report.
42. Overall, the Council considers there to be no fundamental issue with the proposals, with the SDP Regulations broadly mirroring the requirements

which apply to LDP preparation. The fact that LPAs are identified as a specific consultation body is also strongly welcomed; however, it is considered that the subsequent SDP guidance needs to ensure how the views of LPAs can contribute effectively to the evolving SDP and help develop consensus given the proposed timeframe of preparation. In this respect, it is considered that there is insufficient time within the proposed process to enable the building of consensus between the 11 Planning Authorities and other partners in a new and complex statutory process. Given the evidenced difficulties and challenges of securing robust Regional Plans elsewhere in the UK (where Regional Plans are not a requirement), this is considered a key matter to ensure the SDP process can be delivered effectively in practice.

43. The Council's proposed response identifies other uncertainties regarding resource implications given that LPAs have a duty to maintain up-to-date LDPs through the Review process. Further clarity is also sought from the Welsh Government regarding the definition of 'strategic' matters to help all stakeholders better understand whether sites/issues most appropriately fall within the remit of the SDP or LDPs/LDPLs.

### **Cardiff Council Position**

44. Cardiff Council has, for many years, advocated the city-region as the most appropriate level for coordinating economic and spatial development activities, including transport and land use planning. Central to this proposition is the recognition of the role of the city as a centre of employment, productivity and agglomeration. Building on the already significant weight of evidence, the recent findings of the OECD report commissioned by Welsh Government in January 2019 reasserts that:

*"...urban areas are "engines of growth" in an economy, notably because the agglomeration economies may boost productivity by generating more innovations. Not only do major urban areas benefit from such development, other areas do as well since innovations eventually spill over, leading to higher productivity growth throughout the country (OECD, 2019). Solving the problems of major urban areas is of vital importance, because the agglomeration economies created by cities can have advantages for the entire country."*

45. Cardiff Council is therefore committed to working towards establishing fair and proportionate regional governance arrangements to deliver an evidence-led policy agenda, which can enhance prosperity for the wider region. The necessity of this approach is again set out in the OECD urban-rural typology report:

*"Wales has two main urban clusters... one in the northeast and one in the southeast, separated by a distance of about 180 km. The urban cluster in the southeast has its centre in Cardiff.... These two urban clusters, which represent less than one-fourth of the Welsh territory, are home to 70% of the Welsh population and produce 75% of Wales' GDP. On the other hand, the rural remote areas of Wales, which account for*

*more than two-thirds of the Welsh territory, host 23% of the population and produce 20% of the GDP.*

46. International evidence also makes clear that those city-regions with a greater level of discretion and freedom from central government control – within a framework of strong, accountable governance – are those that are doing better. Empowering the city-region to succeed will therefore require more than the aggregation of Local Authority powers to a regional level. The new arrangements must be based on a commitment to a new devolution settlement where appropriate powers and funding are devolved down from National Government, as well as up from Local Government. The UK is currently one of, if not the most, centralised developed states in the OECD and Wales has an opportunity to exercise the devolution advantage to support the Cardiff city-region.
47. The establishment of a CJC for the Cardiff Capital Region provides an opportunity to strengthen city-region governance, building on the growing effectiveness and maturity of collaboration between local authorities in the context of the City Deal. This has a number of potential benefits:
  - The strengthening of city-region leadership, addressing the constraints of an existing governance model that is narrowly focused on the City Deal;
  - The formation of a local government-owned development vehicle that could articulate a powerful agenda for city-region collaboration and regeneration, which also channels Welsh and UK Government funding; in particular, the Shared Prosperity Fund;
  - The impetus to develop a coherent city-region brand, identity and inward investment strategy based on the collective and sectoral strengths of a region with almost 50,000 businesses and a population of 1.5 million; and
  - A significant strengthening of mechanisms to coordinate key regional planning frameworks in response the economic interdependency of the component parts of the city-region.

### **Implications for Cardiff**

48. In effect, CJsCs would represent a further step forward in the development of formal city-region arrangements following the establishment of the CCR City Deal Regional Cabinet. However, while the proposed CJC model has the potential to strengthen these arrangements, the regulations do include a number of areas of concern. Whilst it is appropriate for the CJC to occupy the same footprint as the City Deal, it should be noted that the democratic arrangements on which they are based are, in a number of ways, sub-optimal as set out below:

- Proportionality: Whilst provisions within the Bill allow for a change to the voting system, the CJC will be established on the basis of ‘One Authority, One Vote’ approach. The practical consequence of this is that the 367,000 residents of Cardiff would be served by one representative with one vote, whilst the four smallest local authorities – with a collective population of fewer than 320,000 residents – would have four votes. Whilst current arrangements as part of the CCR City Deal are viewed positively and can be characterised as collaborative and evidence-led, there remains a risk that future regional strategy could be determined by a relatively small proportion of the regional population and distort an evidence-led city-region approach.

Under the current City Deal arrangements, Cardiff Council is also contributing to the running costs on a pro-rata basis, equating to almost a quarter of the total costs. The lack of proportionality in the voting arrangements is made all the more stark in the context of Cardiff’s funding contribution. As a consequence, the Council will need to satisfy itself on behalf of the Cardiff electorate that an arrangement, which sees funding allocated on a proportional basis, but not voting rights, is in the interest of the Local Authority.

- Diminished Democratic Accountability: With no power for the electorate to directly elect those represented on the CJC, it must be recognised that elements of the democratic process are being further removed from the electorate, local councillors and the local scrutiny function. Provisions need to be established to ensure that this democratic deficit is bridged.
- Diminished Representation: This principle of proportionate representation is particularly relevant given the unequal distribution of different demographic groups, with urban areas having a predominately younger group with a broader ethnic profile. There is a need to ensure that the interests of different demographic groups are considered in any regional body given the relative democratic deficit they face in a ‘One Authority, One Vote’ approach.

49. Despite the inadequacies of the CJC governance arrangements as currently set out in the Regulations, Cardiff Council remains committed to establishing a regional approach to enhance the success of the city-region. This would be predicated on assurances by the Welsh Government that the evidence base required for setting the policy agenda, prioritising projects and allocating funding is consistent with the approach set out in the OECD report. It also requires an approach that is truly city-regional, recognising the strengths, weakness and opportunities of its constituent parts.

## Planning

50. The concept of a SDP is welcomed and expected to improve the co-ordination of major strategic developments across the city-region. It is also assumed that the determination of planning applications will also remain within the control of local government.
51. Whilst there is a clear role for the SDP, the LDP, Local Planning Authority/Committee and local development control remain crucial components of the approach to effective land use planning. The democratic accountability and professional rigour associated with the development of the LDP will ensure a fully informed SDP, alignment between local and regional planning and the involvement of local councillors.
52. It should be noted that the original proposals for a SPP included provisions for differences in population amongst constituent authorities, and such an approach would remain the preferred option for Cardiff. Even if 'One Authority, One Vote' is accepted as the basis of CJC decision making, as is currently proposed, Cardiff Council will argue that population-weighted voting should underpin consideration of the SDP.
53. This reflects a need to recognise that strategic planning decisions, which will have uneven impacts across the region, are taken in a manner that properly represents local communities. The risk with a 'One Authority, One Vote' approach is that, based on current population spread, it is plausible that decisions will require the approval of voting members that represent just 20% of the region's population. Whilst the region has worked on a largely consensual basis to date, it should not be assumed that this will always be the case. There is also a clear need to ensure that the SDP governance arrangements recognise the needs of under-represented groups and communities.
54. This is a position that has previously been considered by the region, given the importance of democratic representation in such matters. To that end, the CCR responded to the Planning (Wales) Act 2015 by developing proposals for a SDP that were presented to the CCR City Deal Regional Cabinet on 10 June 2019.<sup>1</sup> These proposals included arrangements for voting that reflected differences in population across the city-region, with Cardiff allocated 5 voting members from a total of 23 voting panel members. The table below outlines the proposals included within the report:

---

<sup>1</sup> <https://www.cardiffcapitalregion.wales/wp-content/uploads/2019/06/ccr-regional-cabinet-10-06-19-item-9-strategic-development-plan.pdf>

## **Proposals** for a Strategic Development Plan (SDP) for the Cardiff Capital Region

<b>Local Authority</b>	<b>No. of Voting Members</b>
Blaenau Gwent	1
Bridgend	2
Caerphilly	3
Cardiff	5
Merthyr Tydfil	1
Monmouthshire	3
Newport	2
Rhondda Cynon Taf	3
Torfaen	1
Vale of Glamorgan	2
Total voting panel members	23
Nominated non-voting panel members	1/3 of the Panel

55. The report was drafted with the aim of gathering endorsement from all ten constituent authorities within the CCR. Subsequently, the majority of local authorities supported the approach, with all local authorities who took the report to their respective decision making bodies resolving to support the proposals. Events have since been superseded by the Welsh Government proposals for CJsCs.

### Transport

56. A Regional Transport Plan (RTP) is welcomed, and necessary, given Cardiff's role as the regional employment centre and the significant volume of commuter traffic to and from Cardiff.
57. Both the Council's Transport White Paper and the Metro proposals set out a transformative package of projects that will make a decisive contribution to tackling the Climate Emergency, addressing inequality and promoting inclusive economic growth across the region. More fundamentally, a bold and fully joined up approach to transport within the city-region will signal a decisive move away from the incrementalism that has characterised the development of mass public transport infrastructure in the region for many years and which is utterly inadequate if the Cardiff Capital Region is to address the Climate Emergency, increase productivity and connect communities with opportunity.
58. Cardiff is fully committed to working with the region to pursue an evidence-led approach to project identification, prioritisation and delivery that supports intra-regional transport movements. It is important, however, given the scale of Cardiff's economy and population, and the high volume of transport movements within the city, that the Capital City of Wales retains the ability to develop its own Local Transport Plan that is recognised as a key enabler of wider success. This needs to include Cardiff retaining control of some major transport projects within the city and the ability to maintain a strategic partnership with the Welsh Government. Equally, it is essential that Cardiff maintains its ability to

manage the local transport network, including the determination of local bus routes, moving traffic offences and Civil Parking Enforcement. The Council should also retain control over its highways and transport assets.

59. This will ensure that the local authority retains the ability to deal directly with UK and Welsh Government and Transport for Wales, or partnerships such as the Western Gateway, in dealing with investment issues in its area as appropriate. This includes working directly on issues identified within the Transport White Paper, such as specific Metro schemes within Cardiff.
60. The same issues relating to planning also relate to transport in terms of proportionality. In the case of Cardiff, this is especially important due to the amount of transport activity in the city that is sourced from the wider region.

### Economic Development

61. In terms of economic development, there is little detail included in the draft regulations other than the ability of the CJC to exercise economic well-being powers. This will allow for City Deal arrangements to be rolled over into the new CJC, which would provide a sensible approach to building on the existing arrangements that are already in place. To that end, the CCR City Deal Office is preparing a response to how it would propose to transition its arrangements into a new structure as part of the new CJC arrangements. To all intents and purposes, the new structure would reflect the current arrangements, albeit with a more formalised 'body corporate' and, potentially, the removal of the need for Cardiff Council to act as the Accountable Body.
62. The new structure would build on the arrangements of the CCR City Deal, and the assumption would be that it would provide a vehicle for stronger regional strategy, underpinned by statutory functions around strategic planning and regional transport planning. In addition, the expectation is that it would become a body that would receive funding from other government sources.
63. The CCR itself has responded to the Welsh Government consultation on the CJC Regulations by stating that: *"The CCR Cabinet is an existing and experienced Joint Cabinet Committee – and this is the fundamental starting point for a strategy that is more than a consultation response. In terms of first principles, the approach is to set out a compelling vision for the future and a focus on building effective regional institutional capacity. This starts with a sequenced Roadmap for the next 3 years and is based on the assumption that WG will play its part by enacting OECD recommendations that will give life to regional public investment and the principle of concurrence with existing local arrangements."*
64. The overall principles of this approach are sound, though there is a clear need to ensure that Cardiff Council's ability to exercise its economic well-being powers remain unfettered. It is also essential that Cardiff retains all its key capital assets relating to economic development, as well as the

ability to manage and deliver projects locally, and maintain an account management approach to dealing with businesses. There is also a need to ensure that Cardiff retains a local event and place promotion capability, whilst recognising and increasing role in collaborating on a regional basis for reasons of both efficiency and efficacy.

65. In summary, it is essential that Cardiff Council's ability to exercise its powers of economic well-being remain undiminished and enhanced regional arrangements should serve to complement, rather than compete with, the Council in this area.
66. The issues of proportionality also remain valid for economic development. Regional working should seek to treat each individual and business equally and, to that end, the removal of EU Structural Funds boundaries should also remove the previous inability of residents and business in Cardiff, often in some of Wales' most deprived areas, to access the same levels of financial support as is available elsewhere in Wales.

#### Revenue Raising and Finance

67. Cardiff would be supportive of regional revenue raising initiatives, such as Tax Increment Financing, precepts, levies or other business rate retention schemes to support capital investment in agreed projects. However, the Council could not support the transfer any of its own income or revenue generating capability.
68. The lack of borrowing powers for CJsCs could be seen as restricting their ability to deliver capital projects and, to that end, consideration should be given as to how principal councils may work in practice with CJsCs to deliver major projects. This may include, for example, carrying on with the current City/Growth Deal arrangements in parallel with the establishment of CJsCs.
69. The role of the Accountable Body that has been undertaken by local authorities as part of existing City/Growth Deal arrangements will also undoubtedly change, with statutory finance roles sitting directly with the new CJsCs. This will impact on Cardiff Council's relationship with the CCR City Deal for whom it acts currently as the Accountable Body.

#### Devolution, not Centralisation

70. The risk is that CJsCs will do little more than tidy up current City/Growth Deal arrangements in Wales, whilst creating additional costs for local authorities who are expected to contribute towards the overall running costs. This is of particular concern given that austerity has already led to a significant reduction in economic development, planning and transport resources for all local authorities. It is important therefore to ensure that there is suitable devolution of appropriate Welsh Government functions and resources to the proposed CJsCs. This is also important in helping to reduce duplication of activity and ensuring that there is one primary strategy for the region that is led by the CJC.

71. CJCs will also need to operate with autonomy in building relationships with other partners, including the UK Government and the private sector. This will demonstrate real devolution in practice and serve to establish a more coherent regional approach.

### **Reason for Recommendations**

72. To enable the Council to submit responses to the two Welsh Government consultations by 4 January 2021.

### **Financial Implications**

73. There are no direct financial implications arising from this consultation response. However, the consultation does set out financial matters to be considered prior to implementation and these are set out in the body of the report. The proposed implementation date during 2021/22 also indicated that these matters need to be considered as part of the Council's budget setting process for 2021/22.

### **Legal Implications**

74. The legal implications are set out in the body of the report.
75. The Planning (Wales) Act 2015 amends Part 6 of the Planning and Compulsory Purchase Act 2004 (PCPA) and sets out the process for the purpose of introducing SDPs. The SDP Regulations will make procedural provisions which supplement Part 6 of the PCPA.
76. The Local Government and Elections (Wales) Bill confers a power on the Welsh Ministers to establish CJCs via regulations. The Establishment Regulations will provide for the core aspects of the establishment and operation of the CJCs.
77. The remaining legal implications are:
- (a) Equality Act 2010  
The decision about these recommendations has to be made in the context of the Council's public sector equality duties. The Council also has to satisfy its public sector duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The Protected characteristics are: age, gender reassignment, sex, race – including ethnic or national origin, colour or nationality, disability, pregnancy and maternity, marriage and civil partnership, sexual orientation, religion or belief – including lack of belief.

(b) The Well-Being of Future Generations (Wales) Act 2015

The Act places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales – a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible. In discharging its duties under the Act, the Council has set and published well-being objectives designed to maximise its contribution to achieving the national well-being goals. The well-being objectives are set out in Cardiff's Corporate Plan.

When exercising its functions, the Council is required to take all reasonable steps to meet its well-being objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the well-being objectives and must be satisfied that all reasonable steps have been taken to meet those objectives. The well-being duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:

- Look to the long term
- Focus on prevention by understanding the root causes of problems
- Deliver an integrated approach to achieving the 7 national well-being goals
- Work in collaboration with others to find shared sustainable solutions
- Involve people from all sections of the community in the decisions which affect them

The Council must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible using the link below: <https://gov.wales/well-being-future-generations-wales-act-2015-guidance>

(c) Welsh Language (Wales) Measure 2011

The Council has to be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards when making any policy decisions and consider the impact upon the Welsh language.

## **HR Implications**

78. There are no HR implications directly applicable to this report. However, there are potentially significant HR implications depending on the workforce routes taken by the CJC. If secondments from the principal councils is the primary methodology of staffing the CJsCs, as has been done through the City Deal, then many HR implications can be mitigated. If, however, staffing is undertaken through direct recruitment, then this

could cause inequities amongst staff as all councils have their own pay and grading structures and terms and conditions of employment. Although TUPE transfers will apply, these will be on current terms and conditions that could result in multiple employees working side-by-side on very different terms and conditions. All these issues will need to be worked through as part of any implementation process.

### **Property Implications**

79. There are no property implications arising directly from this report.

### **RECOMMENDATIONS**

Cabinet is recommended to:

1. Note the Welsh Government consultation documents on Regulations to establish Corporate Joint Committees (CJCs) and to establish the procedure for Strategic Development Plans (SDPs) to be prepared Wales by CJCs;
2. Approve the draft responses to the two Welsh Government consultations, which are attached as Appendices A and B to this report; and
3. Delegate authority to the Chief Executive, in consultation with the Leader of the Council, Cabinet Member for Investment & Development and Cabinet Member for Strategic Planning & Transport, to make any further amendments as necessary to the Council's draft responses to the consultations prior to submission in advance of the closing date of 4 January 2021.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Paul Orders</b> <b>Chief Executive</b>
	11 December 2020

*The following appendices are attached:*

Appendix A: Cardiff Council Response to the Welsh Government Consultation on Regulations to establish Corporate Joint Committees

Appendix B: Cardiff Council Response to the Welsh Government Consultation on The Town and Country Planning (Strategic Development Plan) (Wales) Regulations 2021

*The following background papers have been taken into account:*

- [Regulations to establish Corporate Joint Committees – Welsh Government Consultation Document](#)

- [South East Wales Corporate Joint Committee Regulations 2021](#)
- [The Town and Country Planning \(Strategic Development Plan\) \(Wales\) Regulations 2021 – Welsh Government Consultation Document](#)
- Local Government Reform White Paper Consultation (2017)
- Power to Local People White Paper Consultation (2015)
- Reforming Local Government White Paper Consultation (2014)

This page is intentionally left blank

## APPENDIX A

### Welsh Government Consultation on CJC Regulations – Summary of Consultation Questions

Consultation Question		Response / Comments
<b>Section Two – Approach to developing the regulations</b>		
Q1a	What are your views on CJCs being subject to broadly the same powers and duties as principal councils?	<p>Cardiff Council is in agreement with this proposal where appropriate; however, there should not be duplication of existing City Deal or principal council arrangements which work satisfactorily. For example:</p> <ul style="list-style-type: none"><li>• each principal council has a Standards Committee, which are governed by detailed regulations regulating the membership which includes a requirement to have a number of independent non-elected members. It is time consuming and quite difficult to recruit sufficient independent members with the required skills and to keep them trained to the requisite level to deal with the infrequent and low level number of complaints which Standards Committees have to deal with (e.g. in Cardiff to date, there have been two complaints requiring a local hearing since the last local elections in 2017). CJCs should have a Code of Conduct and arrangements in place to deal with any complaints; however, each CJC should have the discretion to make their own arrangements for lower level complaints to be dealt with locally, rather than by the Public Services Ombudsman for Wales. Either one of the existing Standards Committees of the principal councils which are members should deal with all complaints in relation to members of the CJC (including any complaints against co-opted members if there are any) and an agreement as to funding should be made with the CJC, or each principal council's committee should deal with complaints made against their own elected members and one of the Standards Committees should be identified to deal with any complaints about co-opted members of the CJC breaching the code with the CJC making the findings available for this.</li></ul>

Consultation Question		Response / Comments
		<ul style="list-style-type: none"> <li>there should, of course, be appropriate scrutiny of the CJC as it is very important that democratic accountability is not further diluted (it is already diluted by the fact that, in the proposed Cardiff Capital Region CJC, Cardiff with a population of circa 367,000 has one vote, which will be the same as Merthyr which has a population of circa 60,000), However, the draft regulations propose the CJC setting up a Scrutiny Sub-Committee. A sub-committee would not be acceptable as the CJC should not scrutinise itself. One approach to scrutiny will not necessarily work for all CJCs and so the regulations should require there to be appropriate scrutiny arrangements in place with options set out in guidance. The Cardiff Capital Region City Deal has a Joint Scrutiny Committee of all its principal councils in place currently, and the best initial solution may be for this to continue, with a review at a subsequent date.</li> </ul>
Q1b	Do you agree that CJCs should have broadly the same governance and administrative framework as a principal council provided that this is proportionate? Please give your reasons.	See answer provided to Q1a above.
Q1c	Do you agree that members of CJCs should have appropriate discretion on the detail of constitutional and operational arrangements? Please give your reasons.	The constitutional and governance arrangements of the CJCs should be broadly set out in regulations and, where there is discretion on how to set up and exercise these arrangements, the decision should either require the approval of all member councils or should be made by the CJC, subject to a high quorum being required.
<b>Section Two – Approach to determining the area of each CJC</b>		
Q2	These CJC areas have been agreed by local government Leaders as the most appropriate to reflect the functions being given to CJCs by these Establishment Regulations. Do you have any comments or observations on these CJC areas in relation to these functions or the future development of CJCs?	The South East Wales CJC area is consistent with the existing Cardiff Capital Region and any related transition to the new CJC arrangements should ensure that the established Cardiff Capital Region name and branding is retained.

Consultation Question		Response / Comments
<b>Section Two – Regulations of General Application</b>		
Q3a	Do you agree with the approach to the development of the regulations for CJsCs as outlined in this consultation? Please give your reasons.	Yes.
Q3b	We have indicated throughout this document what may be included in the Regulations of General Application, subject to the outcome of this consultation. Whilst the Regulations of General Application are not the subject of this consultation, in order to inform their development we would welcome your views on anything else which should be covered?	No comments.
<b>Section Three – Membership</b>		
Q4a	Do you agree with the proposed approach to membership of CJsCs including co-opting of additional members? Please give your reasons.	The co-option of additional elected members with voting powers may help to address the democratic deficit of 'One Member, One Vote' (OMOV).
Q4b	What are your views on the role proposed for National Park Authorities on CJsCs, as described above?	No comments.
<b>Section Three – Voting Arrangements</b>		
Q5a	What are your views on the proposed approach of 'one member one vote' and the flexibility for CJsCs to adopt alternative voting procedures?	<p><u>Proportionality</u></p> <p>There is very little flexibility within the existing provisions in the Bill for adopting alternative voting arrangements as it requires unanimity in the decision making of CJsCs. In essence, this means that the voting arrangements are determined by the legislation and not by CJsCs. A 'One Authority, One Vote' approach will see significant distortions in the level of representation for the populations of the CJC area, as highlighted above in the response to Q1a. This will mean that the 367,000 residents of Cardiff would be served by one representative with one vote, whilst the four smallest local authorities within the Cardiff Capital Region (CCR) – with a collective population of fewer than 320,000 residents – would have four votes. Whilst current arrangements as part of the CCR City Deal are</p>

Consultation Question	Response / Comments
	<p>viewed positively and can be characterised as collaborative and evidence-led, there remains a risk that future regional strategy could be determined by a relatively small proportion of the regional population and distort an evidence-led city-region approach.</p> <p>Under the current City Deal arrangements, Cardiff Council is also contributing to the running costs on a pro-rata basis, equating to almost a quarter of the total costs. The lack of proportionality in the voting arrangements is made all the more stark in the context of Cardiff's funding contribution. As a consequence, the Council will need to satisfy itself on behalf of the Cardiff electorate that an arrangement, which sees funding allocated on a proportional basis, but not voting rights, is in the interest of the Local Authority.</p> <p><u>Diminished Democratic Accountability</u></p> <p>With no power for the electorate to directly elect those represented on the CJC, it must be recognised that elements of the democratic process are being further removed from the electorate, local councillors and the local scrutiny function. Provisions need to be established to ensure that this democratic deficit is bridged.</p> <p><u>Diminished Representation</u></p> <p>If OMOV is used, there will need to be mechanisms in place to ensure that issues of equality and fairness are considered. For example, with the Cardiff Capital Region's BAME population mostly resident in the cities of the region, it is imperative that their voice is not lost. This principle of proportionate representation is particularly relevant given the unequal distribution of different demographic groups, with urban areas having a predominately younger group with a broader ethnic profile. There is a need to ensure that the interests of different demographic groups are considered in any regional body given the relative democratic deficit they face in a 'One Authority, One Vote' approach.</p>

<b>Consultation Question</b>		<b>Response / Comments</b>
Q5b	What are your views on the proposed quorum for CJsCs?	The proposed high quorum of 70% of voting members is supported.
Q5c	What are your views on the proposed approach to voting rights for co-opted members to a CJC?	Cardiff Council is already concerned at the dilution of democratic accountability caused by the OMOV proposal. It recognises that co-opted members may provide valuable input to democratic decision making, but does not believe that non-elected co-opted members should have a vote as it would further dilute democratic accountability.
<b>Section Three – Sub committees</b>		
Q6	What are your views on CJsCs being able to co-opt other members and/or appoint people to sit on sub-committees?	See answer provided to Q5c above.
<b>Section Three – Wider Involvement of Partners/Stakeholders</b>		
Q7a	Do you agree that the approach to co-option of members would enable wider engagement of stakeholders in the work of a CJC?	Engagement with stakeholders can take place through consultation and does not necessarily require the co-option of non-elected members.
Q7b	What might be needed to support CJC members in the involvement and engagement of appropriate stakeholders in their work?	Guidance on effective consultation with all stakeholders and population groups (including those with protected characteristics under the Equality Act) and options for effective scrutiny.
<b>Section Three – Code of Conduct</b>		
Q8a	Do you agree that members and staff of a CJC should be subject to a Code of Conduct and that the code should be similar to that of Principal Councils? Please give your reasons.	Yes, it is important that high standards of public life are seen to be adhered to.
Q8b	What are your views on the adoption of a Code of Conduct for co-opted members?	It is important that there is consistency and that co-opted members are bound by the same rules as elected members.

<b>Consultation Question</b>		<b>Response / Comments</b>
Q8c	Should all co-opted members be covered by a code i.e. those with and without voting rights?	Yes, consistency and high standards of behaviour in public life are an essential part of good governance. Not having voting rights does not mean that you should not be required to treat others with respect or to declare any conflicts of interest.
<b>Section Four – Finance, funding and budgetary matters</b>		
Q9a	What are your views on the proposed approach for determining the budget requirements of a CJC?	It is essential that the CJC budget requires the approval of individual member councils who should retain control of their own budgets and any decision on the financial contribution to be made to the CJC.
Q9b	What are your views on the timescales proposed (including for the first year) for determining budget requirements payable by the constituent principal councils?	The proposed timescales are achievable, but only if these are phased appropriately.
Q10a	Do you agree that CJsCs should be subject to the same requirements as principal councils in terms of accounting practices? Please give your reasons.	Yes.
Q10b	Do you agree that the detail of how a CJC is to manage its accounting practices should be included in the Regulations of General Application? If not what more would be needed in the Establishment Regulations?	Yes.
<b>Section Five – Staffing and workforce matters for CJsCs</b>		
Q11	What are your views on the proposed approach to staffing and workforce matters?	The proposed approach is supported.
Q12	What are your views in relation to CJsCs being required to have or have access to statutory “executive officers”?	A CJC should be required to have a Chief Executive, Chief Finance Officer and Monitoring Officer. It should have discretion as to whether to employ its own officers to fill these posts or to have an agreement with member councils to fulfil the roles. Cardiff Council would query the need for a separate post of Chief Governance Officer, as the duties of the role are not clear from the regulations.

Consultation Question		Response / Comments
Q13	Do you have any other views on provision for staffing or workforce matters within the establishment regulations?	No comments.
<b>Section Six – The functions to be exercised by the CJs</b>		
Q14a	Is it clear what functions the CJs will exercise as a result of these establishment regulations? If not, why?	No, the scope of the Strategic Development Plan (SDP) and Regional Transport Plan (RTP) are still to be determined.
Q14b	Do the establishment regulations need to say more on concurrence, if so what else is needed, or should that be left to local determination?	<p>It is important that powers such as economic well-being are concurrent to enable each member council to continue to exercise these powers concurrently with the CJC and, if they wish, without the approval of the CJC. As a corporate elected body with democratic accountability and the capital city of Wales, Cardiff must be able to utilise economic well-being powers to deliver on its commitments to its residents and businesses separately from the CJC.</p> <p>Cardiff Council requests confirmation from the Welsh Government that the CJC will in no way fetter the ability of Local Government to use its powers relating to economic well-being.</p>
Q14c	In your view are there any functions which might be appropriate to add to these CJs in the future? If yes, what?	No, there will be a need to a review/evaluate the operation of CJs once established.
Q15	Do you think the regulations should provide for anything to be a decision reserved to the CJC rather than delegated to a sub-committee? If so what?	<p>Decisions on budgets should be made by the CJC and there should also be unanimous agreement among member councils. Similarly, decisions on the adoption or approval of plans or strategies (including the SDP and RTP) and consideration of any reports required by statute should also be matters for the CJC. The regulations should ensure that these decisions cannot be delegated to sub-committees.</p> <p>Any proposals for CJs to take on additional functions should require unanimous agreement among CJC member councils in decision making and the agreement of principal councils.</p>

Consultation Question		Response / Comments
		In addition, the CJC should also be responsible for decisions on the appointment of senior executive officers, including the Chief Executive, Chief Finance Officer and Monitoring Officer.
Q16	What are your views on the approach to transfer of the exercise of functions to these CJsCs?	It is unclear what the transfer would currently constitute.
<b>Section Seven – CJsCs and duties as a Public Body</b>		
Q17	What are your views on CJsCs being subject to wider public body duties as described above?	This proposal is supported.
<b>Section Eight – Implementation</b>		
Q18a	The Welsh Government is keen to continue working closely with local government and others on the establishment and implementation of CJsCs. Do you have any views on how best we can achieve this?	There is a need for continued consultation with principal councils, the WLGA and groups representing professional officers such as SOLACE, CIPFA and LLG, as well as the provision of funding for start-up costs.
Q18b	In your view, what core requirements / components need to be in place to ensure a CJC is operational, and exercising its functions effectively?	<p>Democratic accountability – need for a link back to principal councils for democratic accountability.</p> <p>Budget – sufficient resources and staff to deliver what is expected.</p> <p>Governance – need for a Constitution with clear terms of reference, roles and responsibilities, decision making processes and governance arrangements, including appropriate scrutiny and accountability. In addition, Codes of Conduct for members and staff will also be required.</p> <p>Where existing City/Growth Deal arrangements will become CJsCs, then a transition period and transition plan will be required – e.g. current scrutiny arrangements and statutory officer arrangements could continue with a planned and timetabled review.</p>

<b>Consultation Question</b>		<b>Response / Comments</b>
Q18c	In particular, what do you think needs to be in place prior to a CJC meeting for the first time, on the day of its first meeting and thereafter?	Funding and staffing arrangements, constitution, governance and communications. Put simply, this would mean things like the public facing website for meetings.
Q19a	Do you think it would be helpful for the Welsh Government to provide guidance on the establishment and operation of CJCs?	Yes.
Q19b	Are there any particular areas which should be covered by the guidance?	Options for arrangements to cover appropriate scrutiny arrangements and arrangements for dealing with complaints against members, and clarity around the ability of principal councils to carry out economic well-being powers concurrently with the CJC.
Q20a	How can the Welsh Government best support principal councils to establish CJCs?	Provision of funding for CJC start-up costs. Clarity of purpose and processes – what is mandatory and what is discretionary, and guidance on discretionary issues setting out possible options.
Q20b	Are there areas the Welsh Government should prioritise for support?	Provision of funding for CJC start-up costs.
Q20c	Is there anything that CJCs should/should not be doing that these Establishment Regulations do not currently provide for?	No comments.
<b>Impact Assessment</b>		
Q21a	Do you agree with our approach to, and assessment of, the likely impacts of the regulations? Please explain your response.	No comments.
Q21b	Do you have any additional/alternative data to help inform the final assessment of costs and benefits contained within the Regulatory Impact Assessment? If yes, please provide details.	No comments.

Consultation Question		Response / Comments
<b>Welsh Language</b>		
Q22a	We would like to know your views on the effects that establishment of CJsCs would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.	No comments.
Q22b	What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?	No comments.
Q23	Please also explain how you believe the proposed policy for the establishment of CJsCs could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.	No comments.
Q24	We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:	No comments.

## **APPENDIX B**

### **CONSULTATION FORM**

#### **The Town and Country Planning (Strategic Development Plan) (Wales) Regulations 2021**

This consultation is seeking your views on the policy approach for the subordinate legislation required to establish the procedure for Strategic Development Plans (SDPs) to be prepared across Wales by Corporate Joint Committee (CJCs) and associated matters. The Regulations will be called the Town and Country Planning (Strategic Development Plan) (Wales) Regulations 2021.

If you have any queries on this consultation, please email:

[planconsultations-b@gov.wales](mailto:planconsultations-b@gov.wales) or telephone: 0300 025 3882.

#### **Data Protection**

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tick the box below. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

## CONSULTATION FORM

### The Town and Country Planning (Strategic Development Plan) (Wales) Regulations 2021

Date:		
<b>Name</b>	James Clemence	
<b>Organisation</b>	Cardiff County Council	
<b>Address</b>	Strategic Planning Room 219 County Hall Atlantic Wharf Cardiff CF10 4UW	
<b>E-mail address</b>	stwilliams@cardiff.gov.uk	
<b>Telephone</b>	029 22330981	
<b>Type</b> <i>(please select one from the following)</i>	Business	<input type="checkbox"/>
	Local Planning Authority	<input checked="" type="checkbox"/>
	Government Agency / Other Public Sector	<input type="checkbox"/>
	Professional Bodies / Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self-help groups, co-operatives, enterprises, religious, not for profit organisations)	<input type="checkbox"/>
	Other (other groups not listed above)	<input type="checkbox"/>

<b>Q1</b>	<b>Do you agree the SDP Regulations should broadly mirror the key stages and plan preparation requirements set out in the LDP Regulations, subject to the exceptions referred too?</b>	<b>X</b>
	To assist with your response please see paragraphs 4.1 - 4.4 of the consultation document	

	<b>Agree</b>	<b>X</b>
	<b>Disagree</b>	

**If not, please explain why**

Yes it is agreed that the SDP Regulations should largely mirror the LDP regulations with the exception of the short form procedure and joint plan provisions outlined in the consultation document. As stated in the consultation document, the LDP process is generally well understood by users of the system and works effectively and taking this approach is welcomed by the Council.

However, the Council would question whether 4 years is sufficient time in which to prepare an SDP in line with all of the proposed key stages in the process, including evidence gathering, community and stakeholder engagement, formal public consultation and examination. This is particularly relevant as the general public will need time to understand what an SDP is, how it relates to them and their local communities, and the relationship between SDPs and LDPs.

The Council welcomes confirmation that the SDP will be subject to a Sustainability Appraisal (SA), incorporating a Welsh Language Assessment and a Strategic Environmental Assessment (SEA) and will be subject to the principles and ways of working of the Well-being of Future Generations (Wales) Act.

<b>Q2</b>	<b>Do you agree with the proposed approach to the Community Involvement Scheme (CIS) and Delivery Agreement (DA)?</b>	<b>X</b>
	To assist with your response please see paragraphs 4.6 - 4.7 of the consultation document on SDP Stage 1	

	<b>Agree</b>	<b>X</b>
	<b>Disagree</b>	

**If not, please explain why**

Yes, this will ensure that the same principle of early, effective and meaningful community engagement with the aim of building a broad consensus applies to both LDPs and SDPs and is welcomed by the Council.

However, the difference of scale should not be underestimated and significant resources will be required to do this to the same degree of LDPs, together with the need to tackle logistical, governance and engagement challenges as the SDP progresses.

The proposed emphasis throughout the regulations on the use of electronic communications is also welcomed.

<b>Q3</b>	<b>Do you agree with the list of general and specific consultation bodies listed in Annex 1?</b>	<b>X</b>
	To assist with your response please see paragraphs 4.6 - 4.7 and Annex 1 of the consultation document	
	<b>Agree</b>	<b>X</b>
	<b>Disagree</b>	

**If not, who else do you think should be considered for inclusion and why?**

The Council welcome that LPAs are listed as a specific consultation body in the Annex as it will be important for LPAs to be able to formally comment on the preparation of the SDP

Consideration should also be given to adding specific reference to transport, telecommunications, gas service providers, business interest groups, MPs/MSs/County Councillors and Higher Education in the Annex given their strategic transportation role in the region.

It is important that the SDP process allows for meaningful engagement with general and specific bodies. This can play an important role in raising awareness and building consensus on key matters. However, there are concerns that it may be more challenging for the SDP process (when compared to the preparation of LDPs) to effectively fulfill this role within the proposed timeframes given the geographical extent of the area, numbers of LPAs/other bodies directly involved and the scale of issues being considered. Further thought should be given to this issue in the preparation of further guidance.

<b>Q4</b>	<b>Do you agree with the two stage preparation and consultation approach proposed at Preferred Strategy and Deposit?</b>	<b>X</b>
	To assist with your response please see paragraphs 4.11 - 4.13 of the consultation document on SDP Stages 2 - 4	
	<b>Agree</b>	<b>X</b>

<b>Disagree</b>	
<b>If not, please explain why and what alternative approach you would suggest?</b>	
The Council agrees with the principle of a two stage preparation and consultation approach which mirrors the LDP preparation process but, as referenced in the response to Q3, it is important that consultation and engagement can be effectively delivered within the proposed plan preparation timetable.	

<b>Q5</b>	<b>Do you agree with the particular elements of the procedures and requirements proposed for SDP preparation including proposals from pre-deposit to deposit stage?</b>	<b>X</b>
	To assist with your response please see paragraphs 4.8 - 4.13 of the consultation document on SDP Stages 2 - 4	
	<b>Agree</b>	<b>X</b>
	<b>Disagree</b>	

<b>If not, please explain why</b>	
<p>The Council welcomes the proposed requirement in the regulations that, before a CJC finalises and formally consults on its Preferred Strategy, it must engage with specific and general consultation bodies. This will enable LPAs to feed early into the SDP preparation process but, as stated in earlier responses, there is a need for further guidance to provide greater comfort that this can be meaningful given the scale of issues and proposed preparation timetable. In this regard, it is noted that recent experience elsewhere in the UK has shown that there are considerable challenges in securing robust Regional Plans in a timely manner and these are no longer statutory requirements in either England or Scotland. The further guidance needs to demonstrate how identified shortcomings and issues experienced elsewhere with regard to regional plans can be realistically overcome in a Wales context.</p> <p>In order to avoid confusion with stakeholders, the call for strategic locations and sites will need to be carefully managed where LDPs are being prepared in parallel to the SDP preparation process, and a clear definition of a strategic site will also need to be defined in the proposed SDP Manual so that stakeholders are clear about which process they need to promote their site.</p>	

<b>Q6</b>	<b>Do you agree with the proposed approach for submission, examination and adoption of an SDP?</b>	<b>X</b>
	To assist with your response please see paragraphs 4.14 - 4.20 of the consultation document on SDP Stage 5	
	<b>Agree</b>	<b>X</b>
	<b>Disagree</b>	

**If not, please explain why**

The Council welcomes the proposed approach, which mirrors the approach for LDP submission, examination and adoption. The Council notes that the consultation document states that the tests of soundness in respect of the preparation of an SDP will be updated in the forthcoming draft SDP Manual and the Council looks forward to the opportunity to comment on this document when it is issued.

<b>Q7</b>	<b>Do you agree with the proposed approach to monitoring, review and revision of an SDP?</b>	<b>X</b>
	To assist with your response please see paragraphs 4.21 - 4.23 of the consultation document on SDP Stage 6	
	<b>Agree</b>	<b>X</b>
	<b>Disagree</b>	

**If not, please explain why**

The Council welcomes the proposed approach, which mirrors the approach for LDP monitoring, review and revision. The Council notes that the consultation document states that the content of the review report will be set out in the forthcoming draft SDP Manual and the Council looks forward to the opportunity to comment on this document when it is issued.

<b>Q8</b>	<b>Do you agree with the proposed approach for SDP withdrawal?</b>	<b>X</b>
	To assist with your response please see paragraphs 4.24 - 4.27 of the consultation document on SDP withdrawal	
	<b>Agree</b>	<b>X</b>
	<b>Disagree</b>	

**If not, please explain why**

The Council welcomes the proposed approach, which mirrors the approach for LDP withdrawal.

**Q9** **We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please report them**

The Council notes that preparation of the SDP will require both significant financial and staffing resources and it is noted that the consultation document is silent on this issue. Further guidance is required on both how the preparation of the SDP is to be co-ordinated and funded, and the level of staffing resources required, and how this will be secured.

Many LPAs in South East Wales, including Cardiff Council, have just begun the process of reviewing their adopted LDPs and both financial and staffing resources have been committed to this process. Any further requirement for additional funding for SDP preparation or loss of staffing resources from LPAs could undermine the ongoing LDP review process.

Related to the above issue, further guidance would be beneficial on how the review of LDPs and SDP preparation can most effectively work in parallel to avoid potential local policy gaps and pressure for speculative unplanned development. Further guidance on this and the weight that a SDP carries before it is examined and adopted would be helpful in the SDP Manual to ensure the process is clear for all stakeholders going forward.

Clarity is also needed on how the other functions of the CJC (i.e. Transport and Economy) will relate to the preparation of an SDP in terms of, for example, aligning the preparation of a Regional Transport Infrastructure Plan to identify the infrastructure needed to support the strategic growth being proposed in the SDP.

**Q10** **Other questions**  
**We would like to know your views on the effects that the proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?**

The Council notes that the proposals set out in the consultation document include the requirement for a Sustainability Appraisal (SA) to incorporate a Welsh Language Assessment and that bodies which represent the interests of Welsh culture in the CJC area are included as a consultation body in Annex 1. It is considered these measures will ensure a positive effect on the Welsh Language and enable any negative effects to be mitigated.

**Q11** Please also explain how you believe the proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

See response to question 10 above.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here

**How to respond**

Please submit your comments by 4 January 2021 in any of the following ways:

Email	Post
<p>Please complete the consultation form and send it to:  <a href="mailto:planconsultations-b@gov.wales">planconsultations-b@gov.wales</a></p> <p>[Please include <b>‘Strategic Development Plan (SDP) Regulations Consultation’</b> in the subject line]</p>	<p>Please complete the consultation form and send it to:</p> <p>Strategic Development Plan (SDP) Regulations Consultation            Plans Branch            Planning Directorate            Welsh Government            Cathays Park            Cardiff            CF10 3NQ</p>

**CARDIFF HEAT NETWORK SPECIAL PURPOSE VEHICLE - FULL  
BUSINESS CASE APPROVAL**

**CLEAN STREETS, RECYCLING & ENVIRONMENT (COUNCILLOR  
MICHAEL MICHAEL)**

**AGENDA ITEM: 4**

**APPENDIX 1, 2 AND 4 TO TO THIS REPORT ARE NOT FOR PUBLICATION BY VIRTUE OF PARAGRAPHS 14 OF SCHEDULE 12A OF THE LOCAL GOVERNMENT ACT 1972 AS IT CONTAINS INFORMATION CLASSIFIED AS EXEMPT UNDER SCHEDULE 12A THAT IT CONTAINS INFORMATION RELATING TO THE FINANCIAL OR BUSINESS AFFAIRS OF ANY PARTICULAR PERSON (INCLUDING THE AUTHORITY HOLDING THAT INFORMATION). IN ALL THE CIRCUMSTANCES OF THE CASE, THE PUBLIC INTEREST IN MAINTAINING THE EXEMPTION OUTWEIGHS THE PUBLIC INTEREST IN DISCLOSING THE INFORMATION**

**APPENDIX 3 TO THIS REPORT IS NOT FOR PUBLICATION BY VIRTUE OF THE PROVISIONS OF SCHEDULE 12A PARAGRAPH [16] (INFORMATION IN RESPECT OF WHICH A CLAIM TO LEGAL PROFESSIONAL PRIVILEGE COULD BE MAINTAINED IN LEGAL PROCEEDINGS) TO THE LOCAL GOVERNMENT ACT 1972**

**Reason for this Report**

1. To enable Cabinet to consider and approve: the Final Business Case for Phase 1 of the Cardiff Heat Network; establishment of the project's Special Purpose Vehicle (SPV); on-granting of grant funding to the SPV; on-lending of Welsh Government loans to the SPV; and delegation of powers to the Director of Environment, Planning and Transport to agree the SPV entering into all required agreements to implement the project, including the design, build, operate and maintain (DBOM) contract.

**Background**

2. *The Council's Capital Ambitions document commits the Council to develop Sustainable Heat network proposals for the City. This ambition relates to our climate change and carbon reduction commitments, especially the Welsh Government target for all public sector organisations in Wales to be carbon neutral by 2030. Furthermore, establishment of a heat network is one of the key elements of the Council's One Planet Cardiff Strategy.*
3. Following an extensive feasibility study and other related workstreams, the Outline Business Case (OBC) for the Cardiff Heat Network (CHN), based on the supply of heat from the Trident Park Energy Recovery Facility (ERF), was approved by Cabinet on the 19<sup>th</sup> April 2018 following presentation to the

Environmental Scrutiny Committee on the 17<sup>th</sup> April. The OBC was developed utilising the Office of Government Commerce “Five Case Model” which is seen as best practice for the public sector:

- Strategic Case
- Economic Case
- Financial Case
- Commercial Case/Management Case

4. The Decision to approve the OBC authorized the further development of a Final Business Case for cabinet approval subject to securing the appropriate funding.
5. Capital grant funding of £6.628m for Phase 1 of the CHN (see figure below) has been obtained from the Department of Business, Energy and Industrial Strategy (BEIS) Heat Network Investment Project (HNIP), following a successful application in January 2020. Phase 1 of the network will supply heat to existing buildings owned/operated by the Council, Senedd Cymru, Wales Millennium Centre and Cardiff and Vale College (see figure below). As part of the application for HNIP Capital funding, the Council committed to ensuring the proposed new indoor Arena is connected to the heat network and this will also be connected to Phase 1. As well as these core building connections, the network includes significant scope for expansion and target heat connections have also been identified in the immediate vicinity of the Phase 1 network. Further potential also exists (for example, as part of Phase 2) to extend the network north of the main Cardiff to London railway line, as well as east towards Newport Road though this would be subject to new funding and business model assessments.

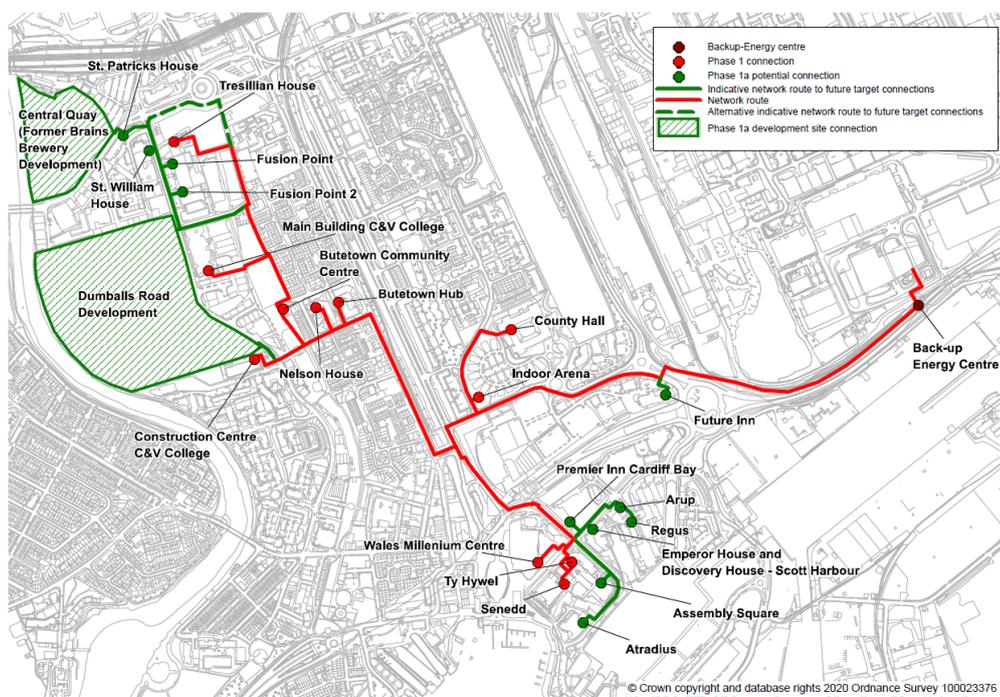


Figure 1: Phase 1 of Cardiff Heat Network

6. Following approval by the Director of Planning, Transport and Environment of an Officer Decision Report (ODR) seeking approval to accept the terms of the HNIP capital grant funding offer, the Funding Agreement with HNIP was

agreed by the Council Legal Department on the 12th August 2020. The Council is required to submit the Funding Request for the drawdown of funds by 28 February 2021 at the latest.

7. Furthermore, an £8.6m interest free loan over 35 years has also been agreed in principle with Welsh Government following ministerial sign off. Repayments for this will start in 2025, two years following practical completion of the whole Phase 1 network.
8. In approving the OBC, Cabinet also delegated authority to the Director for Planning, Transport and Environment in consultation with the Cabinet Member for Clean Streets, Recycling and Environment and the S151 and Monitoring Officer to:
  - Finalise the procurement strategy and commence procurement of a design, build, operate and maintain (DBOM) contractor for the project, generally deal with all aspects of the project and award the DBOM contract after Cabinet has approved the Final Business Case and
  - Agree minor amendments to the OBC which the Director in consultation with those referred to above view as desirable in the interests of the Council provided that if in either case the nature of the project is substantially altered from that set out in the OBC that the matter be referred back to Cabinet.
9. The DBOM procurement was launched on the 30 June 2020 with the publication of a notice entitled Cardiff Heat Network (CHN) (Reference Number ERFX1006800) in the Official Journal of the European Union (OJEU). Following external legal advice, the procurement has used the *Negotiated Procedure with prior call for competition under the Utilities Contract Regulations 2016*, following a two-stage procurement process. Following a deadline of 31<sup>st</sup> July 2020 for the submission of pre-qualification questionnaires, 11 companies were invited to tender
10. The Authority intends to apply the criteria stated in the procurement documentation's Evaluation Methodology to identify the Successful Bidder(s).
11. 7 bids were received at Stage 1. Stage 2 involves an element of negotiation, focused mainly on clarifying detailed design and implementation points with a view to removing or reducing as many risk elements as possible. Stage 2 will close after the date of the Cabinet meeting to consider this report and the final contractor(s) for the scheme are unlikely to be known until then. However there is a pressing need to make progress on key Cabinet decisions in advance of the close of Stage 2 to ensure that the wide range of commercial and other agreements needed for project closure can proceed in line with the grant funding draw down requirements.
12. Prices received at the end of stage 1 provide a robust basis for inclusion in the Final Business Case (FBC). The tendered costs from companies proceeding into Stage 1 have been used to prepare the Final Business Case for Phase 1 of the CHN; thus, providing a robust cost affordability envelope within which Cabinet can make a decision on whether or not to approve the FBC.

13. As part of the OBC Commercial Case, the full range of delivery options were considered, from wholly public sector led models through concession and joint venture models to wholly private sector models and potential variants. A Council Delivery Model with the use of a Special Purpose Vehicle (SPV) was identified as the preferred option.
14. It is proposed that the SPV, which will be wholly owned by the Council, be known as the Cardiff Heat Network. The SPV Business Case is entirely based on the Business Case for the Cardiff Heat Network. Appendix 1 contains the updated Business Case. It should also be noted that the terms of the HNIP funding require the Heat Network to be structured in this way. In formulating the plans for the SPV, the Council has taken legal advice to avoid any of the governance issues that arose with the Robin Hood Energy Company.
15. This Cabinet report provides an overview of the main issues arising from:
  - approving the Final Business Case;
  - establishing the heat network special purpose vehicle;
  - Approving the Shareholder agreement between the Council and the SPV;
  - Accepting the £8.6m Welsh Government interest free loan to the Council and the on-lending of this to the SPV on back-to-back terms;
  - Drawing down the £6.628m HNIP grant and on-lending of this to the SPV; and
  - other related matters.
16. It also considers the proposed delegation of powers to the Director of Transport, Environment and Planning to:
  - Approve the finalised Shareholder Agreement between the Council and the SPV
  - Establish the special purpose vehicle
  - Approve the on-granting (HNIP) agreement between the Council and the SPV
  - Approve the on-lending (WG) agreement between the Council and the SPV
  - Agree the Special Purpose Vehicle entering into agreements with third parties including but not limited to:
    - Sign the design, build, operate and maintain (DBOM) contracts for construction and operation of the network
    - Sign the final bulk heat supply agreement with Viridor
    - Sign the Heat Supply Agreements with customers
    - Sign Utility agreements for gas and electricity at the back up energy centre
    - Sign Easements to cross private land
    - Approve the Business Plan of the SPV

## **Issues**

### Final Business Case for the Cardiff Heat Network Special Purpose Vehicle

17. Building on the OBC for Cardiff Heat Network, a FBC for the Cardiff Heat

Network Special Purpose Vehicle is set out in Appendix 1. This does not revisit the strategic case for establishing the CHN, as this was extensively set out and agreed by Cabinet at the OBC. Instead this concentrates on the financial viability of the scheme taking in to account updated capital costs, projected revenues and operating costs. It considers the revenue from Phase 1 and the potential for expansion of the core scheme.

18. The total capital costs for Phase 1 of the network have been estimated using the outcome from Stage 1 of the procurement of design, build, operate and maintain (DBOM) contractors. Taking in to account, supply and installation of the pipe network, building thermal sub-stations and back-up energy centre, together with the cost of steam to hot water heat exchangers at Trident Park Energy Recovery Facility (ERF), the maximum total capital cost of the CHN is as stated in Table 2 of the confidential FBC. This takes in to account the oversizing of the distribution pipework spine to allow future expansion and includes a small general contingency sum of 5% as well as a contractor's fixed price contingency sum relating specifically unexpected issues arising from excavations for pipe laying.
19. The heat network pipes themselves are expected to have an operational life span in excess of 50 years. However, with good maintenance and the future integration of additional heat sources and customers this could be significantly extended.
20. The FBC is based on capital funding for the project of a £6.628m grant from the Heat Network Investment Project (HNIP) and a £8.592m loan from Welsh Government, administered via Salix. At the time of the OBC was approved by Cabinet, a £4M Council Invest to Save loan allocation was expected, together with a £5.4m HNIP grant funding and £5M Welsh Government funding. The reduced Council input has arisen as a result of Welsh Government making additional zero interest funding available via the loan facility, together with a greater capital grant from HNIP than envisaged at the time of the OBC.
21. Updated forecast cash inflows and outflows for Phase 1 have been prepared using the techno-economic model for the project. This demonstrates that the net cash in year before debt is sufficient to repay the WG annuity. Furthermore, as the repayment of the WG loan will not commence until 2025, this allows a surplus of cash to be built up which will provide a buffer for the project's cash flow. While the net cash in year post debt will become negative between year 5 and year 12, the cumulative net cash in year, taking the early years surplus into account, remains positive throughout. Furthermore it is fully expected that significant growth of the network will occur, with the scheme increasing in size by 75% by 2025 through the connection of 5 private sector loads. Expansion will be further underpinned by encouraging developers to connect through the planning system.
22. The model has also conducted some sensitivity analysis on major risks. One of the most significant of these is the scenario where the Arena project fails to be delivered. If the Arena did not proceed, and only moderate expansion is achieved, the net cash in-year post all debt would be negative between 2025 and 2035. The cumulative net cash in post all debt in this scenario would also be negative between 2026 and 2044. Hence, without further expansion (beyond the moderate expansion) the project would need revenue support,

estimated at circa £60k per annum for 10 years, to maintain a cumulative net cash positive position. However, significant expansion, beyond the moderate expansion scenario, is envisaged.

23. Within the SPV techno-economic model allowance has been made for the cost of staffing the SPV. It is proposed that an Officer of the Council is seconded on a part time basis to the SPV (estimated at 1 day per week), with the Council being paid at cost by the SPV for the loss of time.
24. This report seeks approval of the Final Business Case for the Cardiff Heat Network.

#### Establishment of the Heat Network Special Purpose Vehicle and Governance

25. For local authority-controlled projects where the project capex is greater than £2.4m HNIP requires that the project must be off the National Accounts, such as through the use of a special purpose vehicle (SPV). The HNIP application was made on this basis and the Cardiff HNIP Funding Agreement contains a Condition Precedent requiring the Council to provide evidence that the investment vehicle has been incorporated before the funding request is made. The last date for requesting the draw-down of funds is 28 February 2021.
26. The SPV will be the operating company for the heat network. It will own the infrastructure assets, have contractual relationships with heat supplier(s) (Viridor) and customers and steer the day to day running and expansion of the network. It will also be the “client” for the design, build, operate and maintain contracts
27. Although the creation of a special purpose vehicle is a requirement of the grant funding, it also provides a number of other key benefits including:
  - Limited liability to reduce risk exposure for the Council
  - Defines clear boundaries between the Council and the heat network project
  - Provides a mechanism for allowing future investment in the SPV (subject to Welsh Government Loan Funding being fully repaid) and Council approval as the SPV shareholder.
  - Provides some certainty to the Heat network and commercial customers in the context of potential unforeseen future structural or finance changes at the Local Authority level.
28. Legal Advisors to the project have prepared a Shareholder Agreement between the Council, as the shareholder, and the Company. This sets out details of the structure and governance arrangements, further details of which are provided in paragraph 32 below. This Agreement (which is attached as Appendix 2) regulates the operation and management of the Company and certain aspects of the relationship between the Council and the Company in relation to the development, delivery and operation of the heat network.
29. The Shareholder Agreement contains a list of Reserved Matters (in Schedule 2) which the SPV cannot do without the consent of the Council. This effectively defines the boundary of the operational freedom the Council is

devolving to the SPV management. This draws a line to allow the SPV's board of directors to operate the SPV in the agreed "business as usual" mode without reference back to the Council (although the Council's Directors will be involved throughout and will be reporting back to the Council). If the SPV wishes to borrow money to expand the network (for example, to develop Phase 2) this decision is a reserved matter. Given the impact this could have on the timescales for repayment of the Welsh Government Loan (and the potential for a reduced repayment timeframe), the Council will also need to consult Welsh Government on such proposals.

30. A requirement is also included in the Shareholder Agreement for the SPV to comply with certain specified Council policies. The Council also has the ability to impose additional or amended policies in the future.
31. The board of directors of the Company will have responsibility for managing the Company and will shape the vision and the values of the organisation. The Council, being the sole shareholder, will appoint (and remove) directors to run the company. Directors to be appointed will need to have the relevant skills and experience to deliver the business plan for the Cardiff Heat Network. The Shareholders' Agreement allows the Council to appoint and remove any of the directors (see paragraph 32 below for list of directors).
32. The board of directors of the Company will meet as set out in the Articles of Association. The Managing Director of the Company will produce an:
  - Annual budget
  - Annual business plan
  - Annual report and other documents required to set the strategic direction of the company.
33. The board of directors will approve these strategic documents on an annual basis and as and when required with one of the Council Director acting specifically as the "Shareholder Representative". The Shareholder Representative will be the principal channel of communication between the SPV Board and the Council and monitoring the operation of the SPV and reporting back to the Council. (Note: Shareholder representative means a representative of the shareholder (i.e. the Council) appointed to the Board of Directors pursuant to the Share Agreement.)
34. In order for the Council to maintain control of the company the Council will maintain a majority of directors on the board. Decisions of the directors will be decided by simple majority. It is proposed that the Company Board of Directors shall comprise:
  - Chairman – Director in Council
  - Managing Director – To be appointed
  - Director – recruited from Council with project experience
  - Director – recruited from industry with commercial experience of heat networks
  - Company Secretary – Finance Officer
35. The appointment of the Directors to the SPV will be done formally by the Chief Executive of the Council in consultation with the Cabinet Member for

Clean Streets, Recycling and Environment. The Appointment of an external Director (see bullet 4 above) would be subject to later approval by Full Council.

36. The Council Directors, like all directors, will have to act independently in the best interests of the SPV, however they will also have the role of representing the Council's views at meetings of the board of directors. They may also be subject to other duties owed to the Council in their capacity as Council officers. The scope for potential conflicts between the duties owed to the Council and the duties owed to the SPV have been considered and these are considered manageable under the terms set out in the Shareholder Agreement.
37. Therefore, this report seeks approval for the establishment of the SPV.

#### Approval of on-granting HNIP grant

38. The application for capital grant funding from HNIP was made on the basis that the capital grant received from the programme by the Council is on-granted to the Cardiff Heat Network SPV on the same back to back terms on which it was provided to the Council. A legal agreement between the Council and SPV is being prepared by the project's legal advisors. For information this on-granting is a requirement of the Grant Conditions since HNIP only make grants available to Local Authorities.
39. This cabinet report seeks agreement for the on-granting of the HNIP grant to the SPV and delegates Authority to the Director of Planning, Transport and Environment to agree and execute the on-granting agreement between the Council and the SPV.
40. Note: Legal advice received by the Council has confirmed that the HNIP grant and WG interest free loan (see section below) can be put into the project, while still complying with state aid regulations.

#### Approval of on-lending WG Loan

41. The request for a 35-year interest free loan from WG was made on the basis that the loan received from WG by the Council is on-lent to the SPV on the same back to back terms it is provided to the Council.
42. The draft agreement with WG contains a provision requiring the loan to be repaid over a shorter period should the net cash in year post debt of the SPV rise above £50k per annum i.e. all net cash in year post debt above £50k but less than £200k will be paid to WG to ensure quicker repayment of the loan. Above £200k per annum, 50% of the net cash in year post debt will be used for additional repayments with the remainder staying with the SPV for future expansion and resilience etc.
43. Legal advice has been received on the terms offered in the Welsh Government Agreement and feedback provided. This agreement is being updated by Welsh Government to address the comments provided by the Council.
44. Once the agreement between the Council and Welsh Government is

finalized, a legal agreement between the Council and the SPV will be prepared on the same back-to-back terms.

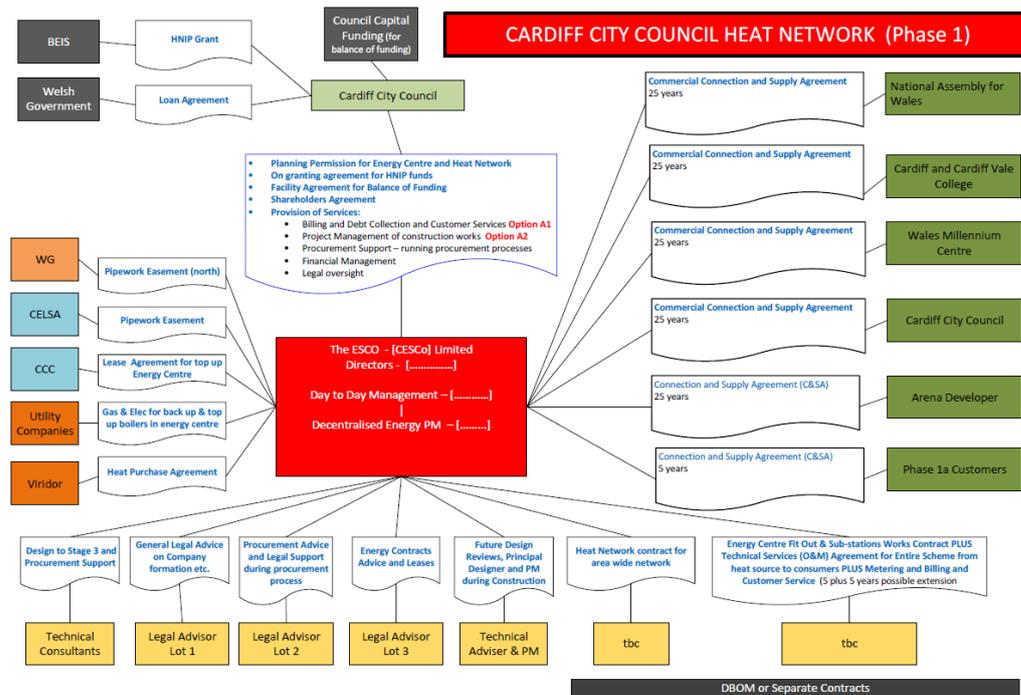
45. This cabinet report seeks agreement for the on-lending of the WG loan to the SPV and delegates Authority to the Director of Planning, Transport and Environment to agree and execute the loan agreement between the Council and WG and on-lending agreement between the Council and the SPV.

#### Other

46. At the time of the OBC a £4M Council contribution was expected, together with £5.4m HNIP grant funding and £5M Welsh Government funding. However, as additional interest free loan funding was obtained from WG there is no longer a requirement for direct Council capital input. However, as outlined above a small annual revenue sum may be needed to support cashflows in the early days operation of the network when fewer customers are connected.
47. This report seeks approval for the Council's contribution to the project.

#### Commercial Agreements between the SPV and third parties

48. The establishment of the Heat Network relies on a wide range of commercial agreements in respect of:
  - Design, build, operate and maintain contracts
  - heat purchase from the ERF Plant,
  - heat supply to customers,
  - easements to cross private land,
  - lease arrangements for the back-up energy centre site
  - planning consent.
49. These are shown in the Agreement Map below - boxes with a curved lower edge represent agreements. The different customer heat sale agreements are shown on the right of the map. The bulk heat supply agreement, together with other agreements necessary to the implementation of the project are shown on the left of the map. The capital funding sources and route by which these flow down through the council into the SPV are shown in the top left section.



50. For each of these areas the project team has discussed and negotiated “heads of terms” positions with the third parties and, where necessary, signed further Memoranda of Understanding etc to bring more certainty to the project as it has developed. Legal advisors have also been commissioned to draft detailed legal agreements in respect of each and these are being considered by the third parties in anticipation of final signing following the Council’s approval of the FBC. The HNIP grant conditions requires these to be in place as conditions precedent to the draw-down of grant funding, the deadline for which is 28<sup>th</sup> February 2021.

51. The agreement to be entered into with Viridor is underpinned by a Summary of Commercial Arrangements (SoCA) document which was signed by the Council and Viridor in September 2019. It should be noted that detailed negotiations are ongoing with Viridor and the scheme is dependent on satisfactory resolution of a final Bulk Heat Purchase Agreement based on the principles of the signed SoCA. It will be for Viridor to separately agree with Prosiect Gwyrdd the change mechanism to allow the Trident Park ERF to operate in heat extraction mode.

52. The agreements to be signed with the Phase 1 customers (Senedd Cymru, Wales Millennium Centre and Cardiff and Vale College) are underpinned by Memoranda of Understanding signed by the Council and each customer in 2019. Full heat sales agreements are being drafted by the Council’s Legal Advisors and will be executed by the SPV once it has been incorporated.

53. This cabinet report seeks to delegate authority to the Director of Planning, Transport and Environment to agree on behalf of the Council, as the sole shareholder, the SPV entering in to all necessary agreements to implement the project.

Other considerations

54. An initial Equality risk assessment has been undertaken on the proposals

and indicated that any risks were low. A full Equality Impact Assessment will be undertaken if Cabinet agrees to the SPV being established.

### Key Risks and Mitigation

55. One of the main risks relates to the ERF plant availability. When the ERF plant is off the heat for the network has to be provided by the gas boilers in the back up energy centre. The cost of producing heat in these boilers is significantly higher than that from the ERF. To account for this risk, the techno-economic model makes assumptions that the ERF will be off-line for a certain set number of hours per annum. If the ERF was off for a significantly longer period this would undermine the economic operation of the heat network. However, it is in Viridor's own interest to ensure that the plant remains operational and various safeguard contractual obligations underpinning its long term operation are provided in the Prosiect Gwyrdd agreement.
56. The connection of the heat network to the ERF requires the pipes to cross over a private railway on land owned by a manufacturing company. Detailed discussions have been held with the company over a sustained period of time and a draft easement has been prepared. While constructive discussions continue the easement is not yet signed and a number of issues remain to be finalized. However a contingency has been allocated in the model to accommodate a final resolution.
57. The construction of the heat pipe network will involve considerable excavation in areas known to be congested. Bidders were required to provide a fixed price in their tender returns to cover reasonable variations to the installation as a result of these.
58. Other risks, opportunities and mitigation in relation to fewer or more connections being made than anticipated are discussed in the Financial Case.

### **Local Member consultation**

59. Local Members have been informed about the generalities of the scheme

### **Reason for Recommendations**

60. To enable Cabinet to consider and approve: the Final Business Case for Phase 1 of the Cardiff Heat Network; establishment of the project's Special Purpose Vehicle (SPV); on-granting of grant funding to the SPV; and on-lending of Welsh Government loans to the SPV and the delegation of Authority to the Director of Planning, Transport and Environment to agree and execute the various agreements required to implement the project.

### **Financial Implications**

61. The procurement process is ongoing and subsequently final prices are not yet available, therefore it is proposed that an affordability envelope for the capital costs are approved based on the tendered prices submitted as part of

stage 1 of the procurement process. Further analysis will be required as these prices are not yet confirmed and if the capital costs are higher than the affordability envelope proposed this will potentially have a detrimental impact to the financial business case proposed. Operating costs have been estimated within the financial business case however further work is required to gain greater clarity on some of the assumptions made which could result in increased costs.

62. VAT advice in relation to transactions between the SPV and the council are in the process of being sought and early indications suggest that there are no significant issues that would cause adverse implications to the council, a report is currently being drafted from external specialists to this effect. In addition, a further understanding is being sought from external specialists in relation to the structure of the Special Purpose Vehicle, particularly from an accountancy viewpoint and any adverse implications to the council arising from this will need to be clearly set out

### **Legal Implications**

63. The grant funding from BEIS and the loan funding from the Welsh Ministers are being provided to the Council in the first instance, which is then providing them to the SPV on essentially back-to-back terms. This means the Council is, and will remain, responsible for the performance of its obligations under the relevant agreements with BEIS and Welsh Ministers. For example, if the SPV is unable to comply with the terms of the on-loan agreement between the Council and the SPV (eg because project revenues are less than anticipated), the Council will nonetheless remain liable to perform its obligations (eg repayment) in the Facility Agreement with Welsh Ministers.
64. The Council controls the SPV and provides the funding it requires to establish and operate its business. The Council must ensure that the SPV is well managed with a view to it becoming, and remaining, a profitable self-sustaining business. Appropriate mechanisms are included in the Shareholder Agreement and other constitutional documents for the SPV to provide the Council with access to the information it needs periodically to review the SPV's performance and take action where appropriate. The Council must include regular oversight of the SPV's activities into the Council's governance processes for trading subsidiaries to ensure that it is in a position to exercise the controls it has over the SPV if and when required.
65. The Grant Thornton Report in the Public Interest for Robin Hood Energy Ltd includes a number of findings relevant to the governance arrangements for Cardiff's ESCo, which can be summarised as follows:
- a successful relationship between a local authority and its subsidiary companies relies on achieving an appropriate balance between the authority on the one hand being sufficiently involved to hold the company to account and on the other hand giving it freedom to manage itself. Ordinarily, a council would set the overall aims of a company and approve its business plan and significant variations from it, and then monitor performance against this business plan by means of an agreed framework

- generally, it is not good practice for councillors to be on the boards of local authority companies, and other mechanisms should be used to ensure that the company meets the council's policy objectives. Having councillors on company boards can lead to a failure to separate properly two sets of interests – those of the company and those of the council.
  - a properly defined shareholder representative role should be the focus for that relationship and the channel through which the subsidiary trading company is held to account by the council
  - the council should ensure that it has in place within its own governance structure appropriate bodies to oversee the operation of the trading company.
66. The Shareholder's Agreement for the SPV is consistent with these recommendations.
67. External legal advisers undertook a legal compliance check (attached at Appendix 3). This confirmed that the project is legally compliant and identified no other material legal implications.  
Equality Duty.
68. The Council has to satisfy its public sector duties under the Equalities Act 2010 (including specific Welsh public sector duties) – the Public Sector Equality Duties (PSED). These duties require the Council to have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of 'protected characteristics'. The 'Protected characteristics' are: • Age • Gender reassignment • Sex • Race – including ethnic or national origin, colour or nationality • Disability • Pregnancy and maternity • Marriage and civil partnership • Sexual orientation • Religion or belief – including lack of belief.
69. Where a decision is likely to result in a detrimental impact on any group sharing a Protected Characteristic, consideration must be given to possible ways to mitigate the harm. If the harm cannot be avoided, the decision maker must balance the detrimental impact against the strength of the legitimate public need to pursue the recommended approach. The decision maker must be satisfied that having regard to all the relevant circumstances and the PSED, the proposals can be justified, and that all reasonable efforts have been made to mitigate the harm.

#### Well Being of Future Generations (Wales) Act 2015 - Standard legal imps

70. The Well-Being of Future Generations (Wales) Act 2015 ('the Act') places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible.
71. In discharging its duties under the Act, the Council has set and published well being objectives designed to maximise its contribution to achieving the national well being goals. The well being objectives are set out in Cardiff's Corporate Plan 2019-22. When exercising its functions, the Council is required to take all reasonable steps to meet its well being objectives. This

means that the decision makers should consider how the proposed decision will contribute towards meeting the well being objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.

72. The well being duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:

- Look to the long term
- Focus on prevention by understanding the root causes of problems
- Deliver an integrated approach to achieving the 7 national well-being goals
- Work in collaboration with others to find shared sustainable solutions
- Involve people from all sections of the community in the decisions which affect them

73. The decision maker must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible using the link below:

<http://gov.wales/topics/people-and-communities/people/future-generations-act/statutory-guidance/?lang=en>

#### General

74. The decision maker should be satisfied that the recommendations are in accordance within the financial and budgetary policy and represents value for money for the council.

75. The decision maker should also have regard to, when making its decision, to the Council's wider obligations under the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards.

#### **HR Implications**

76. As the employees will remain employed by the Council on their existing salaries and terms and conditions of employment, there are no HR implications to the proposal to create a wholly owned Local Authority Trading Company as set out in this report, as nothing will change with the exception that the time they spend working for the SPV will be charged to the SPV.

#### **Property Implications**

77. Strategic Estates note the Heat Network proposals and direct alignment with the Built Environment stream of the One Planet Strategy. It is important that the planning, forecasting and individual property impacts proposed by Heat Network are carefully considered together with Strategic

Estates. This process has already begun by exchanging term sheets and outline design considerations.

78. This report does not include any specific, immediate property implications. Any property decisions relevant to Heat Network will need to be undertaken through the agreed asset management processes and in collaboration with Strategic Estates and relevant managing service areas.

## RECOMMENDATIONS

Cabinet is recommended to:

1. Approve the Final Business Case for the Cardiff Heat Network (including the project's Special Purpose Vehicle) attached to this report, subject to the capital costs affordability envelope arising from the design, build, operate and maintain (DBOM) procurement not exceeding the total capital cost stated in Table 2 of the confidential FBC.
2. Approve the Shareholder Agreement between the Council and the Special Purpose Vehicle, and delegate authority to the Director of Planning, Transport and Environment to make minor amendments to this.
3. Approve the establishment of the Council's wholly owned Special Purpose Vehicle, to be known as the Cardiff Heat Network, under the terms of the Shareholder Agreement which contains the formal Governance Arrangements as generally described in this report.
4. Agree the on-granting of the HNIP grant to the SPV and delegate Authority to the Director of Planning, Transport and Environment to agree and execute the on-granting agreement between the Council and the SPV
5. Agree the on-lending of the WG loan to the SPV and delegate Authority to the Director of Planning, Transport and Environment to agree and execute the loan agreement between the Council and WG and the on-lending agreement between the Council and the SPV.
6. Delegate authority to the Director of Planning, Transport and Environment to agree on behalf of the Council, as the sole shareholder, the SPV entering in to all necessary agreements to implement the project, including but not limited to:
  - The design, build, operate and maintain (DBOM) contracts for construction and operation of the network
  - The bulk heat supply agreement with Viridor
  - The Heat Supply Agreements with customers
  - Utility agreements for gas and electricity at the back up energy centre
  - Easements to cross private land
  - Lease agreement for land for back-up energy centre
7. Delegate authority to the Director of Planning, Transport and Environment , in consultation with the Cabinet Member for Clean Streets, Recycling and Environment and the Council's S151 Officer, to agree on behalf of the Council, as the sole shareholder, updates to the SPV Business Plan and consent to any Reserved Matters as required by the Shareholder's

Agreement (subject to any matter referable to Full Council).

8. Note that the Director of Planning, Transport and Environment already has delegated Authority under the April 2018 OBC approval to award the DBOM contract after Cabinet has approved the Final Business Case.
9. Delegate Authority to the Director of Planning, Transport and Environment to agree all other documents required relating to the constitution and governance and operations of the Special Purpose Vehicle and its relations with the Council.
10. Note that a further report will be taken to Council in due course to approve the appointment of the external non-executive director of the SPV.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Andrew Gregory</b> Director of Planning, Transport & Environment
	11 December 2020

*The following confidential appendices are attached:*

- Appendix 1 – Cardiff Heat Network Special Purpose Vehicle Final
- Appendix 2 – Shareholder’s Agreement between Council and [Cardiff Heat Network SPV] Limited
- Appendix 3 – Legal Advisor’s Compliance Check
- Appendix 4 – Financial Implications



This page is intentionally left blank

By virtue of paragraph(s) 14 of Part(s) 4 and 5 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 14 of Part(s) 4 and 5 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 14 of Part(s) 4 and 5 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 12 of Part(s) 4 and 5 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

**CARDIFF COUNCIL  
CYNGOR CAERDYDD**



**CABINET MEETING: 17 DECEMBER 2020**

---

**SCHOOL ORGANISATION PLANNING: PRIMARY SCHOOL PLACES TO SERVE CATHAYS AND PARTS OF GABALFA, HEATH, LLANDAFF NORTH AND PLASNEWYDD**

**EDUCATION, EMPLOYMENT & SKILLS (COUNCILLOR SARAH MERRY)**

**AGENDA ITEM: 5**

---

**Reason for this Report**

1. To enable the Cabinet to consider a recommendation to hold public consultation on proposals for primary school provision to serve Cathays and parts of Gabalfa, Heath, Llandaff North and Plasnewydd.
2. It is proposed to:
  - Increase the capacity of Ysgol Mynydd Bychan from c0.9 Forms of Entry (FE) (192 places) to 1.5 FE (315 places) from September 2022 and locate the additional school places at Allensbank Primary School in the first instance;
  - Consolidate Allensbank Primary School at 1FE (210 places), retaining nursery and Additional Learning Needs early intervention provision, from September 2022.
3. Consideration will also be given to a temporary increase to the Admission Number of Ysgol Mynydd Bychan, from 30 places to 45 places at entry to Reception Year for the 2021/2022 intake if it is not possible to accommodate children in the area within local Welsh-medium primary schools.

**Background**

4. The Welsh Government published its Cymraeg 2050 strategy in 2017 which sets out a vision of reaching one million Welsh speakers by 2050.
5. By 2050, the aim is for 40 per cent of children (in each year group) to be in Welsh-medium education. Of those in English-medium education, the assumption is that half of those leaving school will report that they are able to speak Welsh.

6. The strategy assumes that, nationally, 70 per cent of 15 year olds will be able to speak Welsh by 2050, made up of 40 per cent in Welsh-medium schools and 30 per cent in English-medium schools.
7. The strategy also sets out transformational changes which include:
  - Expand Welsh-medium early years provision to facilitate a seamless transition into Welsh-medium education.
  - Increase the proportion of each school year group receiving Welsh-medium education from 22 per cent nationally in 2015/16 to 25-29 per cent by 2031, and then to 40 per cent by 2050.
8. The Bilingual Cardiff Strategy identifies priority areas to allow families, children and young people to use Welsh. It aims to increase the number of Welsh speakers and learners within Cardiff as well as increasing the use of the Welsh language in the city.
9. The Welsh in Education Strategic Plan (WESP) is an integral part of the Councils 5-year Bilingual Cardiff strategy and supports the Welsh Government's vision of one million Welsh speakers by 2050.
10. The current WESP is for the period 2017-2020 and is based around the seven key outcomes of the previous strategic plan from 2014.
11. In recognition of the impact of the Covid-19 pandemic, revised WESP regulations will come into force in December 2020. The main changes include moving the draft WESP submission date to no later than 31 January 2022 with the new plan operational no later than September 2022.
12. The current WESP will remain in force until that date.
13. The Council recognises that the education system is a key element in ensuring that children are able to develop their Welsh skills, and for creating new speakers.
14. For Cardiff to achieve the Welsh Government's vision, we would need to increase the number of Welsh speakers by 15.9% from 36,375 (2011 Census) to 42,584 (2021 census); 58% of this has been achieved through increasing the numbers accessing Welsh-medium education.
15. The Council was successful in securing funds from the Welsh Government Increasing Welsh-medium Provision Capital Grant scheme. The purpose is to support capital investments that facilitate growth in Welsh medium education and use of the Welsh language.
16. The successful bid included a proposal to reorganise primary provision in the central area of Cardiff and expand the number of Welsh-medium primary places.

## Issues

### Sufficiency of Welsh-medium primary school places citywide

17. The number and percentage of children entering Welsh-medium primary education citywide fluctuated between 2009/10 to 2016/17. Consistent with the overall population, the number of children entering Welsh-medium education was on an upward trend. The number of children entering Welsh-medium reception classes city-wide peaked in 2016/17 at 744 pupils.
18. Following a fall in the birth rate in 2012/13, there was a fall in intakes to Welsh-medium primary schools city-wide. In January 2020, there were 683 pupils enrolled in Welsh-medium Reception classes city wide, compared to the 840 places available.
19. There was a significant uplift in admissions to the Reception age group at September 2020 with 764 children allocated to Welsh-medium Reception. This represents the highest intake to Welsh-medium Reception classes in Cardiff to date and also the highest percentage (c18%) of the pupil population enrolled in Welsh-medium Reception classes.
20. City-wide intakes to primary education in September 2021 to September 2023 are projected to reduce significantly as a consequence of a further fall in the birth rate and changes to migration patterns, which are evidenced in data published by the Office of National Statistics and the most recent NHS GP registration data sets. However, changes to populations are not consistent in all parts of the city.
21. In January 2020, c16% of primary age pupils and 15% of secondary age pupils in Cardiff were educated through the medium of Welsh.
22. At September 2020, c18% of Reception age primary school places available were through the medium of Welsh, in Welsh-medium or dual stream schools.
23. The Council has expanded Welsh-medium primary school places significantly in the period since 2012, including the expansion of Ysgol Gymraeg Treganna and Ysgol Glan Morfa, and new buildings for a number of schools including Ysgol Glan Ceubal and the establishment of Ysgol Hamadryad.
24. Ysgol Glan Ceubal was established in 2008 in order to meet excess demand for places from the catchment areas of Ysgol Mynydd Bychan, Ysgol Gymraeg Melin Gruffydd and Ysgol Pencae. A nursery class was opened at Ysgol Glan Ceubal in September 2016 and, following consultation, a catchment area for the school was established from parts of the catchment areas of Ysgol Gymraeg Melin Gruffydd and Ysgol Mynydd Bychan. Ysgol Glan Ceubal's new building opened in September 2018 and the school admitted 30 pupils in that intake.

25. Ysgol Gynradd Gymraeg Hamadryad was established in 2016, to serve the communities of Butetown and South Grangetown. The school was temporarily accommodated on the Ninian Park Primary School site in Grangetown, within the catchment area of Ysgol Gymraeg Pwll Coch. In the 2018/19 school year, the school transferred to its current site in Butetown which lies within the catchment area of Ysgol Mynydd Bychan.
26. Following consultation, a catchment area for the Ysgol Gynradd Gymraeg Hamadryad was established from parts of the catchment areas of Ysgol Gymraeg Pwll Coch and Ysgol Mynydd Bychan with effect from September 2021.
27. The Council has also expanded Ysgol Y Wern and has approved proposals for new dual stream primary school provision to serve the early phases of the Plasdwr development.
28. Whilst the Welsh Government has not published targets for each Local Authority within the Cymraeg 2050 strategy, the provision of additional Welsh-medium primary school places will be needed in order to continue progress towards the one million Welsh speakers target.
29. Evidence from the previous expansion of Welsh-medium education shows that the provision of additional Welsh-medium places leads to an increase in the take up of places at Reception level.

#### **Primary schools serving the area**

30. The Cathays, Gabalfa, Heath, Llandaff North and Plasnewydd areas are served by a number of Welsh-medium and English-medium primary schools.
31. Ysgol Mynydd Bychan serves a catchment area that includes the community of Cathays and parts of the communities of Gabalfa, Heath and Plasnewydd.
32. The catchment areas of Ysgol Y Wern, Ysgol Glan Ceubal and Ysgol Melin Gruffydd lie adjacent to the catchment area of Ysgol Mynydd Bychan.
33. The combined catchment areas of Allensbank Primary School, Albany Primary School and Gladstone Primary School, which together form the secondary school catchment of Cathays High School, serve Cathays and parts of Gabalfa, Heath, Llandaff North and Plasnewydd,
34. St Monica's Church in Wales (CiW) Primary School and St Joseph's Roman Catholic (RC) Primary School also serve these communities.
35. Secondary Welsh-medium provision to serve the area is provided at Ysgol Glantaf with secondary English-medium community provision provided at Cathays High School. The area is also served by Corpus Christi Catholic High School and St Teilo's Church in Wales High School.

36. A map indicating the location of, and catchment areas (from September 2021) of, the Welsh-medium schools can be seen at Appendix 1.
37. A map indicating the location of, and catchment areas of, the English-medium primary schools can be seen at Appendix 2.

### **Establishing local demand for school places**

38. In order to calculate the likely demand for school places, historic trends specific to well established school catchment areas have been used.
39. The geographical units that are most suitable to analyse the demand for Welsh-medium primary school places are the discrete catchment areas of Ysgol Mynydd Bychan, Ysgol Y Wern, Ysgol Glan Ceubal and Ysgol Melin Gruffydd (map attached as Appendix 1).
40. The geographical units that are most suitable to analyse the demand for English-medium primary school places are the discrete catchment areas of Allensbank Primary School, Albany Primary School and Gladstone Primary School (map attached as Appendix 2).
41. The following paragraphs give details of these catchment areas, the data used and the methodology applied. Projected demand takes account of the recent proportionate demand for places and pre-school population data supplied by the NHS. Forecast demand considers these data sets, and factors in other contextual information.

### **Current take up of places**

#### **Welsh-medium**

42. Whilst intakes to Ysgol Mynydd Bychan and Ysgol Y Wern have overall remained at high levels, intakes to Ysgol Glan Ceubal and Ysgol Gymraeg Melin Gruffydd fell in 2019/20 but have increased in September 2020.
43. Table 1 overleaf sets out the recent demand for Reception places in Welsh-medium primary schools serving central/ north Cardiff, and projected demand reflecting recent take up and future populations in each area.

**Table 1: Recent and projected take up of places in Welsh-medium schools of pupils resident in the catchment areas of Ysgol Glan Ceubal, Ysgol Gymraeg Melin Gruffydd, Ysgol Mynydd Bychan and Ysgol Y Wern**

Catchment area	Places	PLASC data					Projected take-up at any Welsh-medium primary school			
		2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024
Ysgol Glan Ceubal	30	19	24	16	25	12	17	16	14	15
Ysgol Gymraeg Melin Gruffydd	60	46	55	61	55	37	47	39	43	33
Ysgol Mynydd Bychan	30	41	31	38	38	35	38	32	34	36
Ysgol Y Wern	90	73	73	81	90	87	94	87	83	85
Total	210	179	183	196	208	171	196	174	175	169
Surplus places		31	27	14	2	39	14	36	35	41
Surplus %		14.8%	12.9%	6.7%	1.0%	18.6%	<b>6.5%</b>	<b>17.4%</b>	<b>16.8%</b>	<b>19.4%</b>

44. The above projections are based on the most recent PLASC data (January 2020) and do not take into account the uplift in demand for Reception places in the 2020/2021 school year. PLASC data for the 2020/21 school year is not yet available. Demand indicated by the above projections in the catchment areas of Ysgol Glan Ceubal and Ysgol Melin Gruffydd is likely to be c8-12 pupils greater, when January 2021 PLASC data is available, with the wider projected surplus accordingly expected to reduce by c4-5%.
45. Whilst there is sufficient provision across the wider area to accommodate growth in Welsh-medium in the short term, the expected level of surplus places would not be sufficient to greatly increase Welsh-medium take up in the longer term to meet Cymraeg 2050 targets.
46. Whilst changes to catchment areas could improve the balance of places, this would not support long term growth.

### English-medium

47. The take up of English-medium Reception places in the catchment areas of Albany, Allensbank and Gladstone Primary School has varied in recent years.
48. Table 2 overleaf sets out the recent demand for Reception places in English-medium community primary schools within the Cathays High School catchment area, and projected demand reflecting recent take up and future populations in each area.

**Table 2: Recent and projected take up of places in English-medium community schools of pupils resident in the catchment areas of Albany Primary School, Allensbank Primary School and Gladstone Primary School**

Catchment area	Places	PLASC					Projected			
		2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024
Albany	60	52	45	49	46	46	44	38	35	35
Allensbank	45	41	31	40	42	37	33	34	36	39
Gladstone	30	34	27	36	25	30	33	24	26	22
Total	135	127	103	125	113	113	109	96	96	96
Surplus places		8	32	10	22	22	26	39	39	39
Surplus %		5.9%	23.7%	7.4%	16.3%	16.3%	<b>19.0%</b>	<b>28.9%</b>	<b>28.9%</b>	<b>28.8%</b>

### Summary forecasts of demand for places at entry to Reception

49. The work undertaken to establish the likely demand for Welsh-medium and English-medium primary provision shows that there will be an overall projected surplus of c6 – 19% in Welsh-medium and c19 – 29% in English-medium based on existing housing, if there is no uplift or decrease in parental preferences.
50. Appendix 3 details the current capacity and Published Admission Number at entry to each primary school, and the number of pupils enrolled in each year group.
51. At September 2020, c18% of the Reception age primary school places available were in Welsh-medium. In order to make progress towards the Welsh Government national target of 25 - 29% of pupils in Welsh-medium education by 2031, the number of pupils accessing Welsh-medium education at Reception age needs to increase.

### School Information

#### Ysgol Mynydd Bychan

52. Ysgol Mynydd Bychan is located on a 0.2 hectare site on New Zealand Road, Cardiff CF14 3BR.
53. The published capacity of the school is 192 places (Reception- Year 6) arranged over one block. The school also operates a 64 place nursery provision.
54. There is insufficient capacity on the site to allow for an expansion of the school.
55. An Estyn inspection in November 2015 judged the school's performance as good (Many strengths and no important areas requiring significant improvement) with prospects for improvement also judged as good.

56. In the most recent Welsh Government School Categorisation at January 2020, the school was categorised as Green (a highly effective school which is well run, has a strong leadership and is clear about its priorities for improvement).

#### **Albany Primary School site**

57. The school is located on a 0.4 hectare site on Albany Road, Cardiff CF24 3RQ. The school is approximately 1.1 miles from Ysgol Mynydd Bychan.
58. The calculated capacity of Albany Primary School is 420 places arranged over three blocks. The school also operates a 64 place nursery provision.
59. There has been a consistently high uptake of places with the school currently operating at close to full capacity.
60. An Estyn inspection in November 2012 judged the school's performance as good (Many strengths and no important areas requiring significant improvement) with prospects for improvement also judged as good.
61. In the most recent Welsh Government School Categorisation at January 2020, the school was categorised as Yellow (an effective school which is already doing well and knows the area it needs to improve).

#### **Allensbank Primary School site**

62. Allensbank Primary School is located on a 0.5 hectare site on Llanishen Street, Cardiff CF14 3QE. The school is approximately 0.2 miles from Ysgol Mynydd Bychan.
63. The published capacity of Allensbank Primary School is 315, arranged over separate infant and junior buildings. The school also operates a 64 place nursery provision and a Speech and Language early intervention class for up to 8 Foundation Phase pupils.
64. The school could however accommodate up to 420 pupils plus nursery, or up to 360 pupils plus nursery and an Early Intervention Class provision.
65. The take up of places at the school has been consistently lower than the number of places available with the school operating with c41% surplus capacity, compared to its published capacity of 315 places (January 2020).
66. The available capacity and configuration of the site would allow for additional provision to be accommodated on site.
67. An Estyn inspection in January 2020, judged the school's standards, wellbeing and attitudes to learning, teaching and learning experiences, care support and guidance and leadership and management as good.

68. In the most recent Welsh Government School Categorisation at January 2020, the school was categorised as Yellow (an effective school which is already doing well and knows the area it needs to improve).

### **Gladstone Primary School/ St Monica's CiW Primary School site**

69. Gladstone Primary School is co-located with St Monica's CiW Primary School on a 0.5 hectare site on Whitchurch Road, Cardiff CF14 3JL approximately 0.4 miles from Ysgol Mynydd Bychan.
70. Gladstone Primary School occupies the junior building with a published capacity of 210 places. Demand for places has fluctuated with the school currently operating with a surplus of c15%.
71. St Monica's CW Primary School occupies the infant building with a published capacity of 146 places. The school is currently operating with a surplus of c3.4%.
72. An Estyn inspection in February 2014 judged Gladstone's Primary School performance as adequate (strengths outweigh areas for improvement good, with prospects for improvement judged as good. A follow up monitoring visit in April 2015, judged the school to have made good progress in respect of the issues for action and the school was removed from the list of schools requiring Estyn monitoring.
73. In the most recent Welsh Government School Categorisation at January 2020, Gladstone Primary School was categorised as Yellow (an effective school which is already doing well and knows the area it needs to improve).
74. An Estyn inspection in April 2019, judged the St Monica's CW Primary School standards, wellbeing and attitudes to learning, teaching and learning experiences, care support and guidance and leadership and management as good.
75. In the most recent Welsh Government School Categorisation at January 2020, St Monica's CW Primary School was categorised as Green (a highly effective school which is well run, has a strong leadership and is clear about its priorities for improvement).

### **Balancing Welsh-medium and English-medium primary school provision**

76. The Council is committed to the development and expansion of Welsh-medium education.
77. As set out at paragraphs 31 & 32 there are four Welsh-medium primary schools serving the wider area in North/ Central Cardiff.
78. Of these, Ysgol Mynydd Bychan, has projected demand of 32-36 pupils entering Reception Year if the percentage of children within its catchment area remains at 15.6%, based on the weighted-average take up of places in census years 2018, 2019 and 2020.

79. Demand for places from within the Ysgol Mynydd catchment area for entry into Reception at September 2020 was greater than the 0.9FE provision available. Admitting all pupils from within the catchment area who had expressed a first choice preferences for Ysgol Mynydd Bychan would require the school to operate at c1.3FE, although the total demand for Welsh-medium places of c1.5FE indicates an increasing demand for places in its catchment area that is not yet validated in PLASC census data.
80. A reduction in total city-wide pupil numbers entering primary education as a consequence of a fall in the birth rate is projected between September 2021 and 2023. This would allow for a greater proportion of Cardiff's pupil population to enrol in Welsh-medium primary education. The total number of Welsh-medium places available at entry to primary education city-wide could therefore accommodate approximately 22% of the projected pupil population in 2022 and 2023. There is sufficient capacity within the Welsh-medium primary sector city-wide to allow for a significant increase in take up, but in some areas of the city any further increase in demand could only be balanced by changes to school catchment areas or by increasing the number of places available.
81. Proposals brought forward must ensure that the growth of schools is sustainable, whilst the potential negative impact on other schools is minimised.
82. Table 1 indicated that there will continue to be demand for Welsh-medium reception places from within the Ysgol Mynydd Bychan catchment in excess of 1FE if the relative proportion of the population within its catchment area opting for a Welsh-medium education remains at c15.6%. Table 3 (below) sets out forecasts for this catchment area taking account of the most recent intake (17.9%), and also an annual growth in demand by one percentage point from 17.9% to 20.9%.

<b>Table 3: Projected and forecast demand for places in Welsh-medium Reception classes, of children resident in the Ysgol Mynydd Bychan catchment area, 2020 to 2024</b>				
	2020/21	2021/22	2022/23	2023/24
Total population	243	203	216	229
Projected demand: 15.6%	38	32	34	36
Forecast demand: 17.9%	43	36	39	41
Forecast demand: 17.9% increasing to 20.9%	43 (17.9%)	38 (18.9%)	43 (19.9%)	48 (20.9%)

83. The scenarios in table 3 each take account of the known pre-school population in each cohort in the area. Any increase to the percentage, and number, of children admitted to Welsh-medium education would result in a relative reduction in children admitted to English-medium schools.
84. Whilst Ysgol Mynydd Bychan admits up to 30 pupils per year group allowing for efficient class organisation, the calculated capacity of the school within its existing accommodation is 192 places (18 places fewer than the 210 places for a 1FE school).
85. The immediate expansion of Ysgol Mynydd Bychan to 2FE may, at a time of reducing local primary pupil populations, represent a significant risk to sustaining the growth of other local Welsh-medium primary schools. Should Ysgol Mynydd Bychan admit more than 45 pupils, but not close to 60 pupils, this would limit the opportunities to create an efficient class structure and may have a negative impact on the school's ability to balance its budget.
86. The expansion of Ysgol Mynydd Bychan to 1.5FE in the first instance would provide an appropriate number of places to meet demand whilst minimising the impact on neighbouring Welsh-medium schools, and would enable an efficient class structure to operate whilst the school grows. A later phase of expansion to 2FE would support the Council is making progress towards the Cymraeg 2050 targets.
87. Increasing the number of Welsh-medium primary school places at Ysgol Mynydd Bychan would:
- meet demand for places from the local community
  - support the sustainable growth of Welsh-medium education in line with the aspirations of Cymraeg 2050
  - allow for a greater number of children to benefit from the education on offer at the school
  - provide greater opportunities for pupils and staff
  - support the school to maintain and continue to build on its excellent standards as the new curriculum in Wales is introduced

### **Expansion Options**

88. The expansion of provision on the existing Ysgol Mynydd Bychan site is not possible due to site constraints.
89. There are however a number of primary schools within close proximity of Ysgol Mynydd Bychan.
90. Table 4 overleaf sets out details of these school and the distances between the school sites based on safe walking routes (miles).

<b>Table 4: Distances between school sites based on safe walking routes (miles)</b>					
Primary Schools	Ysgol Mynydd Bychan	Allensbank Primary School	Gladstone Primary School	Albany Primary School	St Monica's CW Primary School
Ysgol Mynydd Bychan	N/A	0.22	0.41	1.16	0.48
Allensbank Primary	0.22	N/A	0.44	1.19	0.5
Gladstone Primary	0.41	0.44	N/A	0.82	0
Albany Primary	1.16	1.19	0.82	N/A	0.76
St Monica's CW Primary	0.48	0.5	0	0.76	N/A

91. The Council has investigated alternative site options that may be available and centrally located within the Ysgol Mynydd Bychan catchment area.
92. There is no suitable vacant site available that could accommodate an enlarged Ysgol Mynydd Bychan. Furthermore, there is sufficient capacity within existing schools serving the area to enable the reorganisation of existing provision. Reorganisation would provide an appropriate means of balancing the supply of and demand for both English-medium and Welsh-medium provision in the area, and would represent an effective and efficient use of resources.

### **Short Term**

93. There is surplus capacity within English-medium primary schools in the area, with the number of surplus places projected to increase.
94. Implementing a shared site arrangement for Ysgol Mynydd Bychan in the first instance would limit the impact on all schools and provide an appropriate local solution.
95. Allensbank Primary School is the closest school site to the site of Ysgol Mynydd Bychan, at 0.3 miles from Ysgol Mynydd Bychan. Allensbank also has the highest level of surplus places, and the greatest number of surplus classrooms, not used as classbases, overall. Allensbank Primary School is also well located for families enrolled in or applying for admission to Ysgol Mynydd Bychan as many of those children reside in the northern part of its catchment area.

96. Whilst the shared Gladstone and St Monica's site also has some classrooms not used as classbases, the school is located further from the Ysgol Mynydd Bychan site (0.5 miles away). Gladstone Primary School has a separate 'Boathouse' building but this is not used for classroom teaching at present and would require investment to upgrade it for this purpose. Albany Primary School is 1.16 miles from Ysgol Mynydd Bychan and has few surplus places overall.
97. Table 5 below sets out details of the number of children on roll at Allensbank Primary School from 2016 – 2020. In January 2020, 185 pupils were enrolled, compared to a maximum capacity in the school buildings of up to 420 pupils.

	<b>Rec</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Year 4</b>	<b>Year 5</b>	<b>Year 6</b>	<b>Total</b>
Jan-16	40	32	45	35	38	27	29	246
Jan-17	24	48	30	43	37	29	22	233
Jan-18	25	25	36	26	39	29	22	202
Jan-19	30	26	25	34	30	33	26	204
Jan-20	19	27	25	26	30	27	31	185

98. The high level of surplus at Allensbank Primary School is projected to continue. There is no data available to suggest that the number of pupils enrolling at Allensbank Primary School will exceed 210 places in future years.
99. Where there is a higher than necessary number of school places, resources are being deployed inefficiently that could be better used to improve the quality of education for all learners.
100. Combined with this are the difficulties associated with operating a primary school with a high proportion of its places unfilled. The size of the school and the low number of children on roll means that the school will inevitably face financial difficulties.
101. Reorganising provision would result in creating additional Welsh-medium primary provision whilst retaining an appropriate number of English-medium places to meet demand within the locality based on population projections and historic take up patterns.
102. The location of Allensbank, the level of surplus accommodation, and the site layout would allow for Reception intakes to Ysgol Mynydd Bychan to increase with Ysgol Mynydd Bychan operating between its existing site, and sharing the buildings on the Allensbank site.
103. Consolidating Allensbank at 210 places (Published Admission Number of 30 places at entry to Reception) would allow for the expansion of Ysgol Mynydd Bychan to 315 places (Published Admission Number of 45 places at entry to Reception) from September 2022.
104. The consolidation of Allensbank Primary School is not subject to the requirements of the Welsh Government School Organisation Code as the

proposed capacity would be greater than the highest number of pupils on roll at the school at any time in the previous two years prior to the publication of the proposal.

105. The School Admissions Code allows for a school's Admission Number to be increased if there is a temporary shortage of a particular type of provision in an area, citing an example of Welsh medium education, while additional provision is being established.
106. An increase to the Admission Number at Ysgol Mynydd Bychan, to 45 places, could be implemented for the cohort entering Reception in September 2021. However, Ysgol Mynydd Bychan could not be expanded to accommodate more than 240 primary age children without the publication of a proposal to expand the school in accordance with the requirements of the School Organisation Code.
107. The first round of applications for entry to the Reception age group in September 2021 closes on 12 January 2021. The number of applications for Welsh-medium places at Reception in September 2021, compared to the number of places available in Welsh-medium primary schools serving the wider area, will be kept under review and consideration would be given to Ysgol Mynydd Bychan operating an Admission Number of 45 places from September 2021 if appropriate and in accordance with the School Admissions Code.

### **Long term solution**

108. The Council submitted a capital grant application to the Welsh Government to reorganise primary provision in the central area of Cardiff and expand the number of Welsh-medium primary places by 1FE.
109. The Council is committed to implementing this increase. The expansion of Ysgol Mynydd Bychan by 0.5FE in the first instance represents the initial phase of progress towards this.
110. Engagement with the schools, parents and the wider community on a preferred long term solution as part of the statutory consultation on the proposed expansion of Ysgol Mynydd Bychan, would allow for the views of stakeholders to shape proposals that would provide an appropriate balance of Welsh-medium and English-medium primary school places to serve the area.
111. Any long term solution should seek to achieve the following:
  - Reducing English-medium surplus places to serve the combined catchment areas of Allensbank, Albany and Gladstone
  - Expanding Welsh-medium provision serving the existing catchment area of Ysgol Mynydd Bychan to 2 Forms or entry
  - Provide greater certainty and stability of leadership, management, teaching and support staff, to support continued focus on teaching standards and improved outcomes for pupils

- Enable investment in school buildings to improve the learning environment.

### **Additional Learning Needs**

112. There is a Speech and Language early intervention class at Allensbank Primary School. The class admits up to 8 Foundation Phase children who were not making sufficient progress, but who have good prospects for returning to their local mainstream school.
113. Placements last 1 – 3 years, depending on progress. Pupils are dual registered at their local school and supported to return at the end of the placement. Pupils continue to attend their local school for at least one day a week, to maintain links with local friends and to prepare for a successful early reintegration to their local school.
114. There are no plans to make any changes to this provision.

### **Nursery Provision**

115. Children in Cardiff are entitled to a part-time nursery place from the start of the term following their third birthday and must attend for a minimum of five half days. Nursery places are not allocated on a catchment area basis. Wherever possible places are offered in a local community school or nursery class within two miles of a child's place of residence. If places are unavailable in local community nursery schools or nursery classes, parents may apply for nursery education place funding with an approved provider that has to demonstrate it is able to meet the relevant quality
116. There are no changes planned to the provision of nursery education places arising from this report. The number of nursery places provided within each locality is kept under review and adjusted to reflect local demand.

### **Admission arrangements**

117. The relevant changes to the Council's policy on the admission of children to schools as a result of these proposals relate to the proposed changes in the Published Admission Number of Ysgol Mynydd Bychan, from 30 to 45, and of Allensbank Primary School from 45 to 30.
118. Consultation on the 2022/23 admission arrangements for community schools will take place in December 2020 – January 2021 in accordance with the requirements of the Admissions Code. This consultation would include the proposed changes to Published Admission Numbers.
119. Detailed information regarding admission arrangements is contained in the Council's Admission to Schools booklet, and this information can also be viewed on the Council's website ([www.cardiff.gov.uk](http://www.cardiff.gov.uk)).

### **Implications for secondary school provision**

120. Combined demand across the three Welsh-medium high school catchment areas is at a high level and can be accommodated within the existing school capacity.
121. The Council will consult on its Welsh in Education Strategic Plan (WESP) for the period 2022 – 2030 in 2021. Proposals to respond to changes in demand will be brought forward in good time to ensure that there are sufficient places to meet the demand for Welsh-medium places.
122. A proposal to increase the capacity of Cathays High School to meet demand from within its catchment and the wider area is part of the Council's 21<sup>st</sup> Century Schools Programme and are the subject of a separate Cabinet report to be considered in December 2020.

### **Local Member consultation**

123. Local Members for Cathays, Gabalfa, Heath, Llandaff North and Plasnewydd have been consulted on the proposal. Members have been briefed on the need for additional Welsh-medium places to serve the area, the alignment of the proposal with the Welsh Government's Cymraeg 2050 strategy, and the potential impact of the proposals on local schools.

### **Reason for Recommendations**

124. To balance provision for Welsh-medium and English-medium community primary school provision to serve Cathays and parts of Gabalfa, Heath, Llandaff North and Plasnewydd.

### **Impact of the proposal on the Welsh Language**

125. It is anticipated that there will be a positive impact on the Welsh Language as a result of these proposals.
126. The proposals outlined in this report seek to align with the Bilingual Cardiff Strategy and strongly support the Welsh Government's strategy for the Welsh language by contributing to meeting the targets set out in the Cymraeg 2050 strategy.
127. The Council works closely and constructively with partners on its Welsh Education Forum, which includes representatives of nursery, primary, secondary and further education, childcare, RhAG and the Welsh Government. The Forum actively informs the planning of Welsh-medium places, to continue to drive the Council's plan to sustainably increase the number of learners within Welsh-medium schools and those learning Welsh in English-medium schools.
128. The Council, and its partners on the Welsh Education Forum, are committed to driving the increase in number of pupils educated through the medium of Welsh, to meet the targets within Cardiff's WESP, and to

meet the targets set out in the Welsh Government's Cymraeg 2050 strategy.

129. The Council monitors birth rates, the yield from proposed housing and the patterns of take-up in Welsh-medium provision at primary and secondary age, with a view to bringing forward appropriate plans to meet any increased demand.
130. The Council must ensure that the expansion of school provision is brought forward in a strategic and timely manner, which does not compromise existing provision. Significantly or rapidly expanding Welsh-medium primary school provision would, inevitably, have an impact on the take-up of places in other schools, and in turn on the ability of schools to balance budgets and to attract or retain staff.
131. The Council's aspirations for increasing the number of Welsh speakers, and the Welsh Government's Cymraeg 2050, propose a significant change. Cymraeg 2050 sets national targets of educating 40% of learners in Welsh-medium schools, and a further 30% of learners being educated in English-medium schools being fluent in Welsh. At present, c17% of Cardiff children entering primary education are educated in Welsh-medium schools or classes.
132. This proposal seeks to increase the number of Welsh-medium primary school places available in the area, and seeks to implement the change in such a way that the potential for negative impact on existing schools is limited.
133. There is a risk that provision of additional Welsh-medium primary school places on the new school site may inhibit the growth at other local schools. It is intended that this impact is mitigated by implementing a phased increase in provision.
134. The provision of 105 additional Welsh-medium places at Ysgol Mynydd Bychan would mean that the overall proportion of Welsh-medium places city-wide is increased in an incremental and sustainable manner.

### **Learner Travel Arrangements**

135. There are no plans to change the Council's transport policy for school children.
136. Any pupils affected by the proposals would be offered the same support with transport as is provided throughout Cardiff in line with the same criteria that apply across Cardiff.
137. The Council's transport policy for school children can be viewed on the Council's website [www.cardiff.gov.uk/schooltransport](http://www.cardiff.gov.uk/schooltransport).

## **Financial Implications**

138. The recommendations to this report request approval for a consultation process to be undertaken in relation to a proposed increase in pupil places for Ysgol Mynydd Bychan, with the increased pupil numbers being accommodated within available space at Allensbank Primary School. Should the scheme be taken forward, any capital costs arising, through needing to make adaptations at the Allensbank site, will need to be funded from the Welsh Medium grant allocation referred to earlier in this report. The recommendations also outline a proposed stakeholder engagement exercise regarding a wider review of the balance of Welsh medium and English medium places within the locality. Any future proposals arising from that exercise will require a full financial evaluation and the necessary capital funding will need to be identified before any schemes can progress.
139. In terms of revenue implications, the resources required to fund the additional places at Ysgol Mynydd Bychan will need to be met from within the existing delegated schools budget. As this report outlines, an overall decrease in numbers within the primary phase is being projected and, therefore, the additional places should be affordable within the existing overall budget. However, it is important that the impact on neighbouring schools, whose pupil numbers could reduce as a consequence of this expansion, is monitored closely and any financial impacts are anticipated and managed, as appropriate. As well as the funding directly required for the additional places, it will also be necessary to identify any additional transport requirements. Should additional transport provision be required, this will need to be absorbed within the existing School Transport budget.
140. The revenue implications of the wider review of pupil places within the locality will need to be considered once the engagement exercise has concluded and options have been determined. It will be important that the proposals ensure that surplus capacity is kept to an appropriate level and that the financial viability of individual schools is not compromised. On the basis that overall pupil numbers are currently projected to fall, there should not be a need for additional revenue funding to meet the number of places on offer, however consideration will need to be given to the way in which potential school organisational change will be implemented, with the aim of minimising the risk that any individual school could enter into a financial deficit position.

## **Legal Implications**

141. Under the Education Act 1996, the Council has a general statutory obligation to promote high standards of education and to provide sufficient school places for pupils of compulsory school age. Parents have a right to express a preference for the school they wish their child to attend under section 86 of the School Standards and Framework Act 1998, but this does not provide a right to attend a certain school, as applications can still be refused where this would prejudice the provision of efficient education or the efficient use of resources.

142. A local authority can make school organisation proposals, including making 'regulated alterations' to a community school or maintained nursery school under sections 42-44 of the Schools Standards and Organisation (Wales) Act 2013. The proposals set out in the report constitute 'regulated alterations' and must be considered having regard to the provisions of the 2013 Act and the School Organisation Code 2018, which sets out factors to be considered in respect of different proposals, the statutory procedures, legal requirements and guidance.
143. Where an increase in a school's capacity is proposed, the Council must have regard to evidence of current or future need/demand in the area for additional places, with reference to the school's language category (and religious character / gender intake if applicable). In the case of Welsh medium provision this would include an assessment of the demand for Welsh Medium education (conducted in accordance with any regulations made under section 86 of the 2013 Act). Consideration must also be given to whether the proposals will improve access for disabled pupils in accordance with requirements under the Equality Act 2010.
144. The Council is required, prior to publishing its proposals, to undertake a consultation on its proposals in accordance with section 48 of that Act and the School Organisation Code 2018. The recommendations seek authority to carry out that statutory consultation.
145. Case law has established that the consultation process should:
- (i) be undertaken when proposals are still at a formative stage;
  - (ii) include sufficient reasons and information for particular proposals to enable intelligent consideration and response;
  - (iii) provide adequate time for consideration and response; and;
  - (iv) ensure that the product of consultation is conscientiously taken into account when the ultimate decision is taken.
146. The Schools Organisation Code sets out further detailed requirements and guidance in relation to the statutory consultation, including the requirement for publication of a consultation document (and the contents of that document), a minimum 42 days consultation period including at least 20 school days, and a list of statutory consultees, including parents, pupils, governing bodies, religious bodies, the Welsh Ministers and Estyn. Following the public consultation, the Council is required to issue a consultation report, setting out the issues raised by consultees and its response to those issues. At that stage, a further report is to be submitted to the Cabinet to decide how to proceed.
147. The proposals in relation to use of the land and buildings on the Allensbank Primary School site will be subject to agreement by the school governing body and any associated terms and conditions.
148. If the proposals are taken forward, the admission arrangements, including admission numbers and catchment areas, will need to be determined, following consultation, in accordance with the School

Admission Code and the Education (Determination of Admission Arrangements) (Wales) Regulations 2006.

149. In considering the proposals, the Council must have regard to its public sector equality duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The Protected characteristics are: age, gender reassignment, sex, race – including ethnic or national origin, colour or nationality, disability, pregnancy and maternity, marriage and civil partnership, sexual orientation, religion or belief – including lack of belief. An Equalities Impact Assessment should be carried out to identify the equalities implications and due regard should be given to the outcomes of the Equalities Impact Assessment.
150. The Council must also be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards and consider the impact of its proposals upon the Welsh language. The proposal to increase the Welsh medium education provision should have a positive impact on the use of the Welsh language and support the aims of the Council's approved Welsh in Education Strategic Plan and Bilingual Cardiff Strategy.
151. The Well-being of Future Generations (Wales) Act 2015 requires the Council to consider how the proposals will contribute towards meeting its well being objectives (set out in the Corporate Plan). Members must also be satisfied that the proposals comply with the sustainable development principle, which requires that the needs of the present are met without compromising the ability of future generations to meet their own needs.
152. Further legal advice will be provided as proposals are progressed.

### **HR Implications**

153. The proposals within this report represent increasing the size of Ysgol Mynydd Bychan. The Governing Body and senior leadership team will need to plan for this expansion, ensuring their staffing structure is sufficient to address this. HR People Services will provide support with this and any vacancies which arise will present potential redeployment opportunities in line with the School Redeployment and Redundancy Policy.
154. Similarly, the proposal to reduce the Published Admission Number of Allensbank Primary at 30 places (1FE) from 45 places (1.5FE) will also require the Governing Body and Senior Leadership Team to evaluate the impact of the proposed reduction on their staffing requirements moving forward. This may include undertaking appropriate workforce planning to review posts where they become vacant, or evaluating training options. In the event that the Governing Body does require there to be a reduction in the overall number of staff, then it is hoped that this could be achieved through voluntary means wherever possible.

155. Where it cannot be managed by voluntary means or by workforce planning, it will need to be managed in line with the School Redeployment and Redundancy Policy, which has been adopted by the school governing body. HR People Services will work with the Headteacher and Governing Body to provide support during this period, including through the facilitation of the redeployment process.
156. It will also need to be assessed whether there are any specific staffing requirements in relation to the operation of Ysgol Mynydd Bychan across two school sites and any associated impact on Allensbank Primary. HR People Service will provide support in relation to these discussions as the project develops.
157. This report also proposes engaging with stakeholders with regards to a longer term solution. Any proposals considered as part of this will need to be assessed separately for the HR implications. HR People Services will have early dialogue with stakeholders regarding their views in order to support this engagement process.

### **Property Implications**

158. Strategic Estates will support the Education team on asset management and any future land matters required as part of the consultation process or as a result of the consultation where a land transaction will be required.
159. In the event of any land transactions, negotiations or valuations required to deliver any proposals, they should be done so in accordance with the Council's Asset Management process and in consultation with Strategic Estates and relevant service areas.

### **Traffic and Transport Implications**

160. Ysgol Mynydd Bychan and Allensbank Primary School operate on constrained sites. Each site experiences issues with traffic and parking during morning drop-off and afternoon pick-up times.
161. Recently, the Council introduced CCTV enforcement cameras in Llanishen Street outside Allensbank Primary School to enforce against parking Keep Clear 'Zig Zag' markings.
162. A temporary, staffed road closure was introduced outside Ysgol Mynydd Bychan on Canada Road when schools re-opened in summer 2020 following lockdown. This was to restrict vehicular access near the school in order to provide safe space for social distancing.
163. Since schools re-opened in September 2020, concerns have been raised by parents and ward members regarding traffic and parking outside Ysgol Mynydd Bychan on New Zealand Road. Officers plan to seek Welsh Government funding to create a School Street on New Zealand Road which would restrict vehicular access along the street to residents,

blue badge holders and authorised permit holders during drop off and pick up times. This would make the environment outside the school safer and more conducive to walking and cycling.

164. The expansion of capacity at Ysgol Mynydd Bychan and the issues of traffic and parking at both Ysgol Mynydd Bychan and Allensbank Primary referred to above underline the need to introduce measures which discourage car travel and promote active travel to both school sites. One such measure is the introduction of a School Street. Plans are already being progressed for a School Street on New Zealand Road. There is also potential to do this on part of Llanishen Street. However, both proposals will require consultation with residents and local businesses.
165. Another instrument is the development and implementation of a School Active Travel Plan. The Council is committed to ensuring that every school in Cardiff has an Active Travel Plan by 2022. Such a plan identifies actions by the school to support and encourage active travel to school and will also identify any improvements to on-site and off-site infrastructure required to facilitate active journeys.
166. All new (including reorganised) schools need to have a plan in place from the outset of their operation. The Council's Active Travel Plans officers can support the development of the Active Travel Plans and can support with engagement on the Active Travel Plans as part of the implementation of the proposed expansion of places.
167. The Council's Road Safety Team already provides a programme of cycle and pedestrian training to further encourage take up of active travel to school. This support will continue as part of the ongoing engagement and support that will be provided by the Council's Schools Active Travel Team on Active Travel Plan development and delivery.
168. The Council has developed proposals for a segregated cycleway along Allensbank Road. This will provide a safe cycling connection to Llanishen Street which could be used by pupils travelling to Allensbank Primary School.

### **Equality Impact Assessment**

169. An initial Equality Impact Assessment has been carried out. It concluded that the proposed changes would not negatively affect a particular group in society. Where particular groups are identified as being impacted, mitigating actions have been identified. This assessment will be reviewed after the consultation.
170. A Statutory Screening Tool including Equality Impact Assessment is attached as Appendix 4.

### **RECOMMENDATIONS**

The Cabinet is recommended to authorise officers:

- to consult on proposals to increase the capacity of Ysgol Mynydd Bychan from c0.9FE (192 places) to 1.5FE (up to 315 pupils) from September 2022.
- to undertake a stakeholder engagement exercise to shape proposals that would be taken forward to provide an appropriate balance of Welsh-medium and English-medium primary school places to serve the area.
- Note that consultation on the Admission Arrangements for the 2022/23 academic year will include a proposal to reduce the admission number of Allensbank Primary School from 45 to 30 places.
- Note that officers will bring a report on the outcome of the consultation and engagement exercise to a future meeting to seek authorisation as to whether to proceed to publish proposals in accordance with section 48 of The School Standards and Organisation (Wales) Act 2013.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Melanie Godfrey</b> <b>Director of Education &amp; Lifelong Learning</b>
	11 December 2020

*The following appendices are attached:*

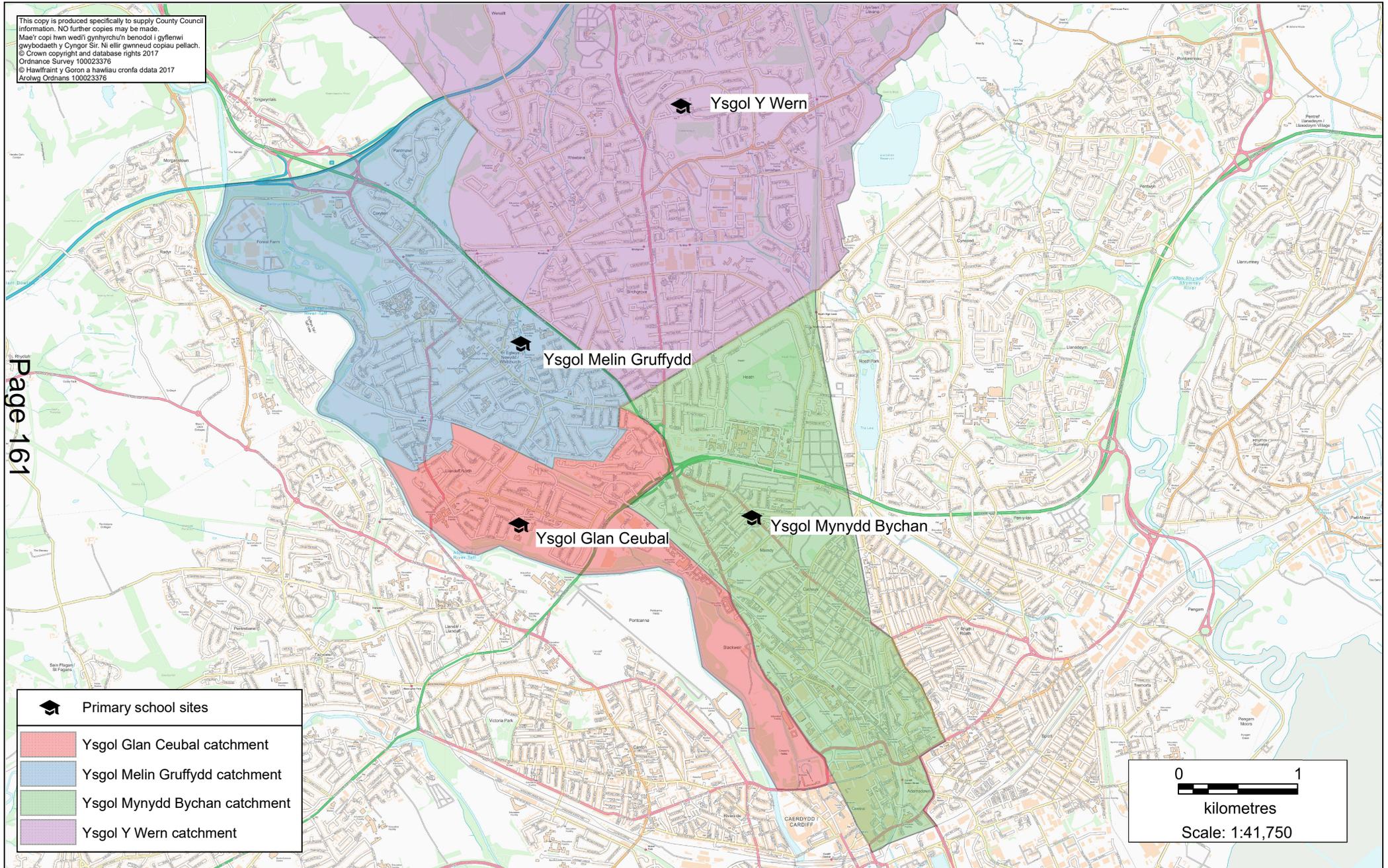
*The following background papers have been taken into account*

- Appendix 1 – Welsh-medium catchment area map
- Appendix 2 – English-medium catchment area map
- Appendix 3 – School Number on Roll data
- Appendix 4 – Statutory Screening Tool

This page is intentionally left blank

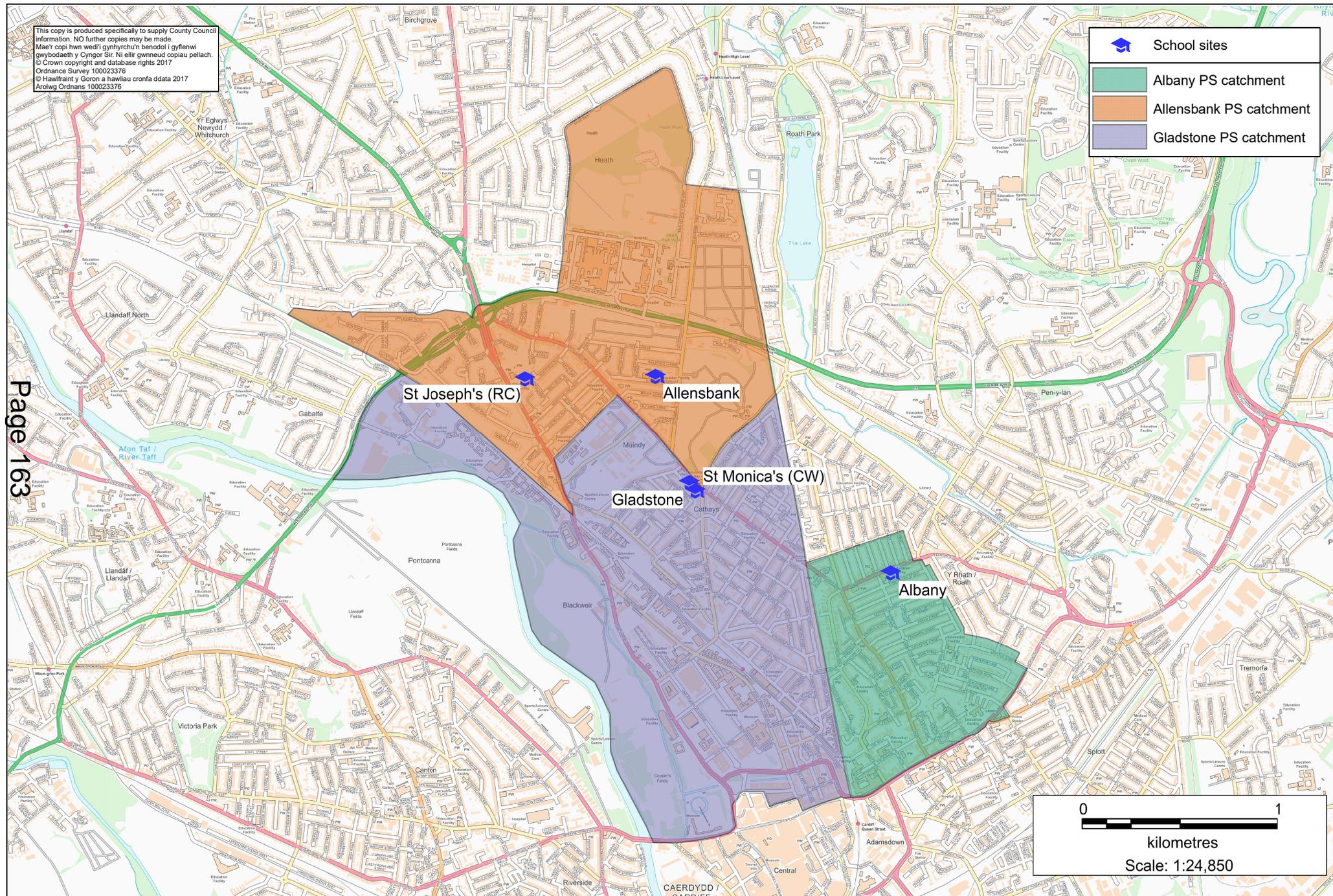
# Map showing Welsh-medium primary school catchments and sites for Ysgol Glan Ceubal, Ysgol Mynydd Bychan, Ysgol Melin Gruffydd & Ysgol Y Wern

Appendix 1



This page is intentionally left blank

# Map showing English-medium primary school sites within the Albany, Allensbank and Gladstone catchment areas



This page is intentionally left blank

School Number on Roll Data: PLASC 2020

Appendix 3

School	Published Admission Number	Rec.	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Number On Roll	Current Capacity	Proposed Published Admission Number	Proposed Capacity
Ysgol Mynydd Bychan	30	31	31	30	26	28	28	28	202	192	45	315
Allensbank Primary School	45	19	27	25	26	30	27	31	185	315	30	210
Gladstone Primary School	30	28	25	23	26	29	23	24	178	210	30	210
Albany Primary School	60	60	60	58	52	50	56	57	393	420	60	420
St Monica's CiW Primary School	20	18	24	21	17	28	13	20	141	146	20	140
Total	185	156	167	157	147	165	147	160	1099	1283	185	1295
Year of Admission		2019-20	2018-19	2017-18	2016-17	2015-16	2014-15	2013-14				

This page is intentionally left blank

## Appendix 4

### Cardiff Council Statutory Screening Tool Guidance

If you are developing a strategy, policy or activity that is likely to impact people, communities or land use in any way then there are a number of statutory requirements that apply. Failure to comply with these requirements, or demonstrate due regard, can expose the Council to legal challenge or other forms of reproach.

For instance, this will apply to strategies (i.e. Housing Strategy or Disabled Play Strategy), policies (i.e. Procurement Policy) or activity (i.e. developing new play area).

Completing the Statutory Screening Tool will ensure that all Cardiff Council strategies, policies and activities comply with relevant statutory obligations and responsibilities. Where a more detailed consideration of an issue is required, the Screening Tool will identify if there is a need for a full impact assessment, as relevant.

The main statutory requirements that strategies, policies or activities must reflect include:

- **Equality Act 2010 - [Equality Impact Assessment](#)**
- **Welsh Government's [Sustainable Development Bill](#)**
- **Welsh Government's Statutory Guidance - [Shared Purpose Shared Delivery](#)**
- **[United Nations Convention on the Rights of the Child](#)**
- **[United Nations Principles for Older Persons](#)**
- **[Welsh Language Measure 2011](#)**
- **[Health Impact Assessment](#)**
- **[Habitats Regulations Assessment](#)**
- **[Strategic Environmental Assessment](#)**

This Statutory Screening Tool allows us to meet all the requirements of all these pieces of legislation as part of an integrated screening method that usually taken no longer than an hour.

---

The Screening Tool can be completed as a self assessment or as part of a facilitated session, should further support be needed. For further information or if you require a facilitated session please contact the Policy, Partnerships and Citizen Focus Team on 2078 8563 e-mail: [siadavies@cardiff.gov.uk](mailto:siadavies@cardiff.gov.uk). Please note:

- **The completed Screening Tool must be submitted as an appendix with the Cabinet report.**
- **The completed screening tool will be published on the intranet.**



## Statutory Screening Tool

<b>Name of Strategy / Policy / Activity:</b>  <b>SCHOOL ORGANISATION PLANNING: PRIMARY SCHOOL PLACES TO SERVE CATHAYS AND PARTS OF GABALFA, HEATH, LLANDAFF NORTH AND PLASNEWYDD</b>	<b>Date of Screening: November 2020</b>
<b>Service Area/Section:</b> Education & Lifelong Learning, Schools Organisation Planning	<b>Lead Officer: Richard Portas</b>
<b>Attendees:</b> Self assessment	

Page 168

<b>What are the objectives of the Policy/Strategy/Project/Procedure/Service/Function</b>	<b>Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]</b>
<p>To enable the Cabinet to consider a recommendation to hold public consultation on proposals for primary school provision to serve Cathays and parts of Gabalfa, Heath, Llandaff North and Plasnewydd.</p> <p>It is proposed to:</p> <ul style="list-style-type: none"> <li>• Increase the capacity of Ysgol Mynydd Bychan from c0.9FE (192 places) to 1.5 FE (315 places) from September 2022</li> <li>• Consolidate Allensbank Primary School at 1FE (210 places), retaining nursery and ALN provision from September 2022</li> </ul>	<p>The Welsh Government published its Cymraeg 2050 strategy in 2017 which sets out a vision of reaching one million Welsh speakers by 2050.</p> <p>By 2050, the aim is for 40 per cent of children (in each year group) to be in Welsh-medium education. Of those in English-medium education, the assumption is that half of those leaving school will report that they are able to speak Welsh.</p> <p>The strategy assumes that, nationally, 70 per cent of 15 year olds will be able to speak Welsh by 2050, made up of 40 per cent in Welsh-medium schools and 30 per cent in English-medium schools.</p> <p>The strategy also sets out transformational changes which include:</p> <ul style="list-style-type: none"> <li>• Expand Welsh-medium early years provision to facilitate a seamless transition into Welsh-medium education.</li> </ul>

- Increase the proportion of each school year group receiving Welsh-medium education from 22 per cent nationally in 2015/16 to 25-29 per cent by 2031, and then to 40 per cent by 2050.

The Bilingual Cardiff Strategy identifies priority areas to allow families, children and young people to use Welsh. It aims to increase the number of Welsh speakers and learners within Cardiff as well as increasing the use of the Welsh language in the city.

This Welsh in Education Strategic Plan (WESP) is for the period 2017-2020 and is based around the seven key outcomes of the previous strategic plan from 2014.

The WESP is an integral part of the Council's 5-year Bilingual Cardiff strategy and supports the Welsh Government's vision of one million Welsh speakers by 2050.

[Reference WESP 2021-2030 here – BA](#)

The Council recognises that the education system is a key element in ensuring that children are able to develop their Welsh skills, and for creating new speakers.

For Cardiff to achieve the Welsh Government's vision, we would need to increase the number of Welsh speakers by 15.9% from 36,375 (2011 Census) to 42,584 (2021 census); 58% of this has been achieved through increasing the numbers accessing Welsh-medium education.

The Council was successful in securing funds from the Welsh Government Increasing Welsh-medium Provision Capital Grant scheme. The purpose is to support capital investments that facilitate growth in Welsh medium education and use of the Welsh language.

	<p>The successful bid included a proposal to reorganise primary provision in the central area of Cardiff and expand the number of Welsh-medium primary places.</p>
--	--

## Part 1: Impact on outcomes and due regard to Sustainable Development

Please use the following scale when considering what contribution the activity makes:		
<b>+</b>	Positive	Positive contribution to the outcome
<b>-</b>	Negative	Negative contribution to the outcome
<b>ntrl</b>	Neutral	Neutral contribution to the outcome
<b>Uncertain</b>	Not Sure	Uncertain if any contribution is made to the outcome

	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
Page 171	<b>1.1 People in Cardiff are healthy;</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li>the promotion of good health, prevention of damaging behaviour, promote healthy eating/active lifestyles etc,</li> <li>vulnerable citizens and areas of multiple deprivation</li> <li>Addressing instances of inequality in health</li> </ul>	x				
	<b>1.2 People in Cardiff have a clean, attractive and sustainable environment;</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li>the causes and consequences of Climate Change and creating a carbon lite city</li> </ul>	x				
	<ul style="list-style-type: none"> <li>encouraging walking, cycling, and use of public transport and improving access to countryside and open space</li> </ul>	x				<ul style="list-style-type: none"> <li>In line with the Well-being of Future Generations Cardiff's Council is committed to providing Local Schools for Local Children, to encourage use of sustainable modes to travel to schools, such as walking and cycling. School projects take into account transport issues when they are being designed and the need to provide safer routes to encourage walking to schools</li> <li>Promotion of initiatives such as Kerbcraft training, training in cycling skills and the Local Authority's implementation of Active Travel measures</li> </ul>
<ul style="list-style-type: none"> <li>reducing environmental pollution (land, air, noise and water)</li> </ul>	x				<ul style="list-style-type: none"> <li>Implementation of an effective travel plan would minimise the need for non-sustainable transport to and from schools</li> </ul>	

	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
	<ul style="list-style-type: none"> <li>reducing consumption and encouraging waste reduction, reuse, recycling and recovery</li> </ul>	x				- Proposals are progressed in line with Welsh Government Community Benefit Measurement Tool which encourages reduced consumption, waste reduction and recycling.
	<ul style="list-style-type: none"> <li>encouraging biodiversity</li> </ul>			x		N/A
<b>1.3</b>	<b>People in Cardiff are safe and feel safe;</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li>reducing crime, fear of crime and increasing safety of individuals</li> <li>addressing anti-social behaviour</li> <li>protecting vulnerable adults and children in Cardiff from harm or abuse</li> </ul>	x				- All schools in Cardiff have policies in place to ensure safeguarding and the wellbeing of staff, children and young people.
<b>1.4</b>	<b>Cardiff has a thriving and prosperous economy;</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li>economic competitiveness (enterprise activity, social enterprises, average earnings, improve productivity)</li> <li>Assisting those Not in Education, Employment or Training</li> <li>attracting and retaining workers (new employment and training opportunities, increase the value of employment,)</li> <li>promoting local procurement opportunities or enhancing the capacity of local companies to compete</li> </ul>	x				- The schools provide employment.
<b>1.5</b>	<b>People in Cardiff achieve their full potential;</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li>promoting and improving access to life-long learning in Cardiff</li> <li>raising levels of skills and qualifications</li> <li>giving children the best start</li> <li>improving the understanding of sustainability</li> <li>addressing child poverty (financial poverty, access poverty, participation poverty)</li> <li>the United Nations Convention on the Rights of a Child and Principles for Older persons</li> </ul>	x				<ul style="list-style-type: none"> <li>The Council's 2030 strategy, clearly state the link between improving the environment for learning and raising standards of achievement.</li> <li>Cardiff's Child Friendly City strategy places the rights and voices of children and young people at the heart of Cardiff's policies, strategies and services; involving them in decision making and addressing the barriers which limit their life chances. As such the public consultation on the proposal will include representation from children and young people.</li> </ul>

	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
1.6	<p><b>Cardiff is a Great Place to Live, Work and Play</b> Consider the potential impact on</p> <ul style="list-style-type: none"> <li>• promoting the cultural diversity of Cardiff</li> <li>• encouraging participation and access for all to physical activity, leisure &amp; culture</li> <li>• play opportunities for Children and Young People</li> <li>• protecting and enhancing the landscape and historic heritage of Cardiff</li> <li>• promoting the City's international links</li> </ul>	x		x		<ul style="list-style-type: none"> <li>- With significant sports and wider leisure provision now established, or being developed, in many schools a key objective is to enable third party to access the sports facilities at schools, on a sustainable financial basis. The development of a viable model for all schools across the city to be accessed by the communities which they serve is needed.</li> </ul>
1.7	<p><b>Cardiff is a fair, just and inclusive society.</b> Consider the potential impact on</p> <ul style="list-style-type: none"> <li>• the elimination of discrimination, harassment or victimisation for equality groups</li> </ul>	x		x		<ul style="list-style-type: none"> <li>- See Equality Impact Assessment below and attached.</li> <li>- The Council's recruitment process would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.</li> </ul>
	<ul style="list-style-type: none"> <li>• has the community or stakeholders been engaged in developing the strategy/policy/activity?</li> <li>• how will citizen participation be encouraged (encouraging actions that consider different forms of consultation, through more in depth engagement to full participation in service development and delivery)?</li> </ul>	X				<ul style="list-style-type: none"> <li>- Subject to authorisation the public consultation will include engagement with all relevant stakeholders.</li> </ul>

	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
	<b>EQUALITY IMPACT ASSESSMENT (This is attached on page 13)</b> Will this Policy/Strategy/Project have a <b>differential impact</b> on any of the following:					
1.8	<p><b>The Council delivers positive outcomes for the city and its citizens through strong partnerships</b></p> <p><i>Consider the potential impact on</i></p> <ul style="list-style-type: none"> <li><i>strengthening partnerships with business and voluntary sectors</i></li> <li><i>the collaboration agenda and the potential for shared services, cross-boundary working and efficiency savings</i></li> </ul>	x				<p>The 'Cardiff Commitment' is the Council's youth engagement and progression strategy. The Cardiff Commitment sets out how the council, together with a wide range of public, private and third sector partners, will work together to ensure a positive destination for every young person in Cardiff after they finish school, either in employment or further education and training.</p> <p>To date over 120 businesses have pledged to support Cardiff Commitment and provide opportunities to schools and young people, better preparing them for the world of work, contributing to the future economic growth of the city.</p> <p>The Council is keen to assist with the development of opportunities between schools and businesses, to help create a sustainable pool of talent for future workforce needs, and spread skills across the city. An example of this is the Creative Education Partnership that has been established between Cardiff West Community High School and partners from the creative industries to provide opportunities for young people to leave education with skills and competences and to be work ready</p> <p>Opportunities for further partnerships are being explored and will be progressed in line with the priorities set out in the Cardiff Commitment</p>

**SUMMARY OF APPRAISAL (highlight positive and negative effects of the policy / plan / project being assessed, demonstrating how it contributes to the economic, social and environmental sustainability of the city):**

**Economic**

- Investment in the expansion of the school would support the delivery of a broad and balanced curriculum.
- The addition 0.5 FE provision at Ysgol Mynydd Bychan would provide employment opportunities.

**Social**

- There could be the potential for community use of school facilities outside of school hours.

**WHAT ACTIONS HAVE BEEN IDENTIFIED OR CHANGES BEEN MADE TO THE POLICY / PLAN / PROJECT AS A RESULT OF THIS APPRAISAL:**

## Part 2: Strategic Environmental Assessment Screening

		Yes	No
2.1	Does the plan or programme set the framework for future development consent?	x	
2.2	Is the plan or programme likely to have significant, positive or negative, environmental effects?		x

<b>Is a Full Strategic Environmental Assessment Screening Needed?</b>	<b>Yes</b>	<b>No</b>
<ul style="list-style-type: none"> <li>▪ If yes has been ticked to both questions 2.1 and 2.2 then the answer is yes</li> <li>▪ If a full SEA Screening is required then please contact the Sustainable Development Unit to arrange (details below)</li> </ul>		X

Page 176

if you have any doubt on your answers to the above questions regarding SEA then please consult with the Sustainable Development Unit on 2087 3228 [sustainabledevelopment@cardiff.gov.uk](mailto:sustainabledevelopment@cardiff.gov.uk)

## Part 3: Habitat Regulation Assessment (HRA)

		Yes	No	Unsure
3.1	Will the plan, project or programme results in an activity which is known to affect a European site, such as the Severn Estuary or the Cardiff Beech Woods?		x	
3.2	Will the plan, project or programme which steers development towards an area that includes a European site, such as the Severn Estuary or the Cardiff Beech Woods or may indirectly affect a European site?		x	
3.3	Is a full HRA needed?		x	

Details of the strategy will be sent to the County Ecologist on completion of the process to determine if a Habitat Regulation Assessment is needed. For further information please phone 2087 3215 or email [biodiversity@cardiff.gov.uk](mailto:biodiversity@cardiff.gov.uk)



## Appendix 1 – Statutory Requirements

It is possible that the Impact Screening Tool will identify the need to undertake specific statutory assessments:

- **Equality Impact Assessment:** *This assessment is required by the Equality Act 2010 and Welsh Government’s Equality Regulations 2011.*
- **Sustainable Development Bill:** *The Bill, when it comes into effect, will require sustainable development (SD) to be a central organising principle for the organisation. This means that there is a duty to consider SD in the strategic decision making processes.*
- **Shared Purpose Shared Delivery-** *The Welsh Government requires local authorities to produce a single integrated plan to meet statutory requirements under a range of legislation. Cardiff Council must therefore demonstrate its contribution towards Cardiff’s own integrated plan; “What Matters”.*
- **United Nations Convention on the Rights of the Child:** *The Children Act 2004 guidance for Wales requires local authorities and their partners to have regard to the United Nations Convention on the Rights of a Child.*
- **United Nations Principles for Older Persons:** *The principles require a consideration of independence, participation, care, self-fulfillment and dignity.*
- **The Welsh Language Measure 2011:** *The measure sets out official status for the Welsh language, a Welsh language Commissioner, and the freedom to speak Welsh.*
- **Health Impact Assessment:** *(HIA) considers policies, programmes or projects for their potential effects on the health of a population*
- **Strategic Environmental Impact Assessment:** *A Strategic Environmental Assessment (SEA) is an European Directive for plans, programmes and policies with land use implications and significant environmental effects.*
- **Habitats Regulations Assessment:** *The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 provides a requirement to undertake Habitats Regulations Assessment (HRA) of land use plans.*



<p><b>Policy/Strategy/Project/Procedure/Service/Function Title:</b>  <b>Proposal to:</b></p> <ul style="list-style-type: none"> <li>• Increase the capacity of Ysgol Mynydd Bychan from c0.9FE (192 places) to 1.5 FE (315 places) from September 2022</li> <li>• Consolidate Allensbank Primary School at 1FE (210 places), retaining nursery and ALN provision from September 2022</li> </ul>
<p><b>New</b></p>

<b>Who is responsible for developing and implementing the Policy/Strategy/Project/Procedure/Service/Function?</b>	
Name: Richard Portas	Job Title: Programme Director School Organisation
Service Team: School Organisation Planning	Service Area: Education and Lifelong Learning
Assessment Date: November 2020	

Page 179

- 1. What are the objectives of the Policy/Strategy/Project/ Procedure/ Service/Function?**
- 1. Please provide background information on the Policy/ Strategy / Project / Procedure / Service / Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]**

<p>The Welsh Government published its Cymraeg 2050 strategy in 2017 which sets out a vision of reaching one million Welsh speakers by 2050.</p>
---

By 2050, the aim is for 40 per cent of children (in each year group) to be in Welsh-medium education. Of those in English-medium education, the assumption is that half of those leaving school will report that they are able to speak Welsh.

The strategy assumes that, nationally, 70 per cent of 15 year olds will be able to speak Welsh by 2050, made up of 40 per cent in Welsh-medium schools and 30 per cent in English-medium schools.

The strategy also sets out transformational changes which include:

- Expand Welsh-medium early years provision to facilitate a seamless transition into Welsh-medium education.
- Increase the proportion of each school year group receiving Welsh-medium education from 22 per cent nationally in 2015/16 to 25-29 per cent by 2031, and then to 40 per cent by 2050.

The Bilingual Cardiff Strategy identifies priority areas to allow families, children and young people to use Welsh. It aims to increase the number of Welsh speakers and learners within Cardiff as well as increasing the use of the Welsh language in the city.

This Welsh in Education Strategic Plan (WESP) is for the period 2017-2020 and is based around the seven key outcomes of the previous strategic plan from 2014.

The WESP is an integral part of the Council's 5-year Bilingual Cardiff strategy and supports the Welsh Government's vision of one million Welsh speakers by 2050.

**Reference WESP 2021-2030 here – BA**

The Council recognises that the education system is a key element in ensuring that children are able to develop their Welsh skills, and for creating new speakers.

For Cardiff to achieve the Welsh Government's vision, we would need to increase the number of Welsh speakers by 15.9% from 36,375 (2011 Census) to 42,584 (2021

census); 58% of this has been achieved through increasing the numbers accessing Welsh-medium education.

The Council was successful in securing funds from the Welsh Government Increasing Welsh-medium Provision Capital Grant scheme. The purpose is to support capital investments that facilitate growth in Welsh medium education and use of the Welsh language.

The successful bid included a proposal to reorganise primary provision in the central area of Cardiff and expand the number of Welsh-medium primary places.

### 3 Assess Impact on the Protected Characteristics

#### 3.1 Age

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative/]** on younger/older people?

	Yes	No	N/A
3 to 11 years	x		
11 to 18 years	x		
18 - 65 years	x		
Over 65 years	x		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

#### **Educational provision (age 3 - 11)**

The Council's aim is to improve the match between the supply of and demand for Welsh-medium and English-medium schools places serving Cathays and parts of Gabalfa, Heath, Llandaff North and Plasnewydd .

The proposal to reduce the capacity of Allensbank Primary School is not expected to have any differential impact as demand for places at the school is projected to be less than the existing capacity.

The proposal would ensure sufficient places for pupils in both Welsh-medium and English-medium settings for ages 3 – 11.

This provision is age dependent and therefore not accessible to pupils outside of this age range, or adults, either locally or in the wider community.

**What action(s) can you take to address the differential impact?**

The council has a statutory duty to provide pupil places to meet the needs of all pupils in Cardiff. As part of this strategic approach, demand is forecast based on:

- Recent and historic populations known to be living in each area utilising NHS data;
- Recent and historic Numbers on roll taken from verified PLASC (Pupil Level Annual Census) for Cardiff schools;
- Recent and historic percentages of children attending English-medium and Welsh-medium community and faith places

Provision for age groups not accommodated by this proposal have been considered outside of this proposal

The project is considered to be a legitimate proposal to achieve a desired aim.

**If no differential impact, explain the reason(s) for this assessment:**

**3.2 Disability and Access**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
--	-----	----	-----

Hearing Impairment		<b>x</b>	
Physical Impairment		<b>x</b>	
Visual Impairment		<b>x</b>	
Learning Disability		<b>x</b>	
Long-Standing Illness or Health Condition			<b>x</b>
Mental Health			<b>x</b>
Substance Misuse			<b>x</b>
Other			<b>x</b>

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
The proposed changes would not have a differential impact as the schools will continue to be able to meet the needs of any children with a disability.
<b>What action(s) can you take to address the differential impact?</b>
<b>If no differential impact, explain the reason(s) for this assessment:</b>
Accessibility of the accommodation

### 3.3 Gender Reassignment

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on transgender people?

	<b>Yes</b>	<b>No</b>	<b>N/A</b>
<b>Transgender People</b> (People who are proposing to undergo, are undergoing, or have undergone a process [or part of a process] to reassign their sex by changing physiological or other attributes of sex)		<b>x</b>	

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
--

The proposed changes would not have a differential impact as the schools will continue to apply the Council's policies on equal opportunities.
<b>What action(s) can you take to address the differential impact?</b>
<b>If no differential impact, explain the reason(s) for this assessment:</b>
The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

**3.4. Marriage and Civil Partnership**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on marriage and civil partnership?

	Yes	No	N/A
Marriage			X
Civil Partnership			X

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
The proposed changes would not have a differential impact as the schools will continue to apply the Council's policies on equal opportunities.
<b>What action(s) can you take to address the differential impact?</b>
<b>If no differential impact, explain the reason(s) for this assessment:</b>
The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

**3.5 Pregnancy and Maternity**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy			
Maternity			N/A

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
The proposed changes would not have a differential impact as the schools will continue to apply the Council's policies on equal opportunities.
<b>What action(s) can you take to address the differential impact?</b>
<b>If no differential impact, explain the reason(s) for this assessment:</b>
The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

**Race**

Will this Policy/Strategy/Project//Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White	x		
Mixed / Multiple Ethnic Groups	x		
Asian / Asian British	x		
Black / African / Caribbean / Black British	x		
Other Ethnic Groups	x		

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
The proposal would have greater impact on the population closer to the school than on the city as a whole. If this local population is made up of a racial mix which is disproportionate to that typically found across the city then there is potential for the proposal to have a differential impact on this community relative to that of the wider Local Authority population
<b>What action(s) can you take to address the differential impact?</b>

The provision being proposed would be accessible to all ethnic groups and compliance with the Council's policies on equal opportunities would need to be ensured.

If no differential impact, explain the reason(s) for this assessment:

### 3.7 Religion, Belief or Non-Belief

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist		x	
Christian		x	
Hindu		x	
Humanist		x	
Jewish		x	
Muslim		x	
Sikh		x	
Other		x	

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

The proposed changes would not have a differential impact as the schools will continue to apply the Council's policies on equal opportunities.

What action(s) can you take to address the differential impact?

If no differential impact, explain the reason(s) for this assessment:

The senior staff in a school would be best placed to manage diversity in terms of belief. (e.g. provision of a space for prayer).

### 3.8 Sex

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on men and/or women?

	Yes	No	N/A

Men		x	
Women		x	

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
The proposed changes would not have a differential impact as the schools will continue to apply the Council's policies on equal opportunities.
<b>What action(s) can you take to address the differential impact?</b>
<b>If no differential impact, explain the reason(s) for this assessment:</b>
Maintained school provision admits pupils of both sexes and this would continue to be the case.  The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

**Sexual Orientation**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
Bisexual		x	
Gay Men		x	
Gay Women		x	
Heterosexual		x	

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
The proposed changes would not have a differential impact as the schools will continue to apply the Council's policies on equal opportunities.
<b>What action(s) can you take to address the differential impact?</b>
<b>If no differential impact, explain the reason(s) for this assessment:</b>

(Fears that recruitment opportunities could be affected by sexual orientation)

Evidence collated by the Stonewall lobby group alleges that Lesbian, Gay, Bisexual people are likely to be discriminated against in workplace recruitment.

The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

**3.10 Language**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on Welsh Language?

	Yes	No	N/A
Welsh Language	x		
Other languages		x	

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
<b>What action(s) can you take to address the differential impact?</b>
<b>If no differential impact, explain the reason(s) for this assessment:</b>
<p><b>Language support</b></p> <p>The proposal will not directly impact on the level of support provided. The allocation of teachers and BTAs is usually in place for the period of the academic year but is liable to change throughout the year to meet fluctuations in demand.</p> <p><b>Impact of the proposal on the Welsh Language</b></p> <p>It is anticipated that there will be a positive impact on the Welsh Language as a result of these proposals.</p>

The proposals outlined in this report strongly supports the Welsh Government's strategy for the Welsh language by contributing to meeting the targets set out in the Cymraeg 2050 strategy.

The Council works closely and constructively with partners on its Welsh Education Forum, which includes representatives of nursery, primary, secondary and further education, childcare, RhAG and the Welsh Government. The Forum actively informs the planning of Welsh-medium places, to continue to drive the Council's plan to sustainably increase the number of learners within Welsh-medium schools and those learning Welsh in English-medium schools.

The Council, and its partners on the Welsh Education Forum, are committed to driving the increase in number of pupils educated through the medium of Welsh, to meet the targets within Cardiff's WESP, and to meet the targets set out in the Welsh Government's Cymraeg 2050 strategy.

The Council monitors birth rates, the yield from proposed housing and the patterns of take-up in Welsh-medium provision at primary and secondary age, with a view to bringing forward appropriate plans to meet any increased demand.

The Council must ensure that the expansion of school provision is brought forward in a strategic and timely manner, which does not compromise existing provision. Significantly or rapidly expanding Welsh-medium primary school provision would, inevitably, have an impact on the take-up of places in other schools, and in turn on the ability of schools to balance budgets and to attract or retain staff.

The Council's aspirations for increasing the number of Welsh speakers, and the Welsh Government's Cymraeg 2050, propose a significant change. Cymraeg 2050 sets national targets of educating 40% of learners in Welsh-medium schools, and a further 30% of learners being educated in English-medium schools being fluent in Welsh. At present, c17% of Cardiff children entering primary education are educated in Welsh-medium schools or classes.

This proposal seeks to increase the number of Welsh-medium primary school places available in the area, and seeks to implement the change in such a way that the potential for negative impact on existing schools is limited.

It is therefore considered that a proposal to increase the capacity of a Welsh-medium primary school by 1FE will support the Welsh-medium projections and support Cymraeg 2050 to promote the Welsh language.

**4. Consultation and Engagement**

What arrangements have been made to consult/engage with the various Equalities Groups?

The Council's Accessibility Officer would be given the opportunity to comment on the scheme.

**5. Summary of Actions [Listed in the Sections above]**

<b>Groups</b>	<b>Actions</b>
Age	See Generic Over Arching below
Disability	
Gender Reassignment	
Marriage & Civil Partnership	
Pregnancy & Maternity	
Race	
Religion/Belief	
Sex	
Sexual Orientation	
Language	
Generic Over-Arching [applicable to all the above groups]	

**6. Further Action**

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

## 7. Authorisation

The Template should be completed by the Lead Officer of the identified Policy/Strategy/Project/Function and approved by the appropriate Manager in each Service Area.

Completed By: Rosalie Phillips	Date: November 2020
Designation: Policy, Equalities and Reports Officer	
Approved By: Brett Andrewartha	
Designation: XXXXX	
Service Area: Schools and Lifelong Learning	

- 7.1 On completion of this Assessment, please ensure that the Form is posted on your Directorate's Page on CIS - *Council Wide/Management Systems/Equality Impact Assessments* - so that there is a record of all assessments undertaken in the Council. For further information or assistance, please contact the Citizen Focus Team on 029 2087 3059 or email [citizenfocus@cardiff.gov.uk](mailto:citizenfocus@cardiff.gov.uk)

## Background

In 2008, a retrospective Strategic Environmental Assessment (SEA) of Cardiff's 21<sup>st</sup> Century: A Strategic Framework for a School Building Improvement Programme (published in 2006) was carried out based on the guidance that supports the European SEA Directive 2001/42/EC.

The retrospective approach to assessment was quality assured by an external consultant and their independent compliance review determined that the report detailing the assessment on the strategic framework met the key requirements set out for reporting the SEA process as required by the SEA Directive.

The retrospective assessment provides the basis for assessing current and future school organisation proposals at a strategic level.

If a proposal were to proceed, an environmental assessment would be carried out as part of the planning application process.

**To request a copy of the assessment on the Strategic Framework please contact Rachel Willis, 029 2087 3946, [RWillis@cardiff.gov.uk](mailto:RWillis@cardiff.gov.uk)**

## Proposal

### Condition of existing school buildings



SEA objective			Do nothing	
	Rating	Commentary/ explanation of compatibility with SEA objective	Rating	Commentary/ explanation of compatibility with SEA objective
		<p>generate local traffic, contribute to congestion and reduce pupil safety. Parking facilities provided at schools is generally only for staff and to meet operational needs.</p> <ul style="list-style-type: none"> <li>- Management of access to the school site prior/during parent drop off and pick up times would help with health &amp; safety.</li> <li>- Cardiff's Supplementary Planning Guidance (Access, Circulation and Parking Standards 2010) sets out that all new or expanded schools are required to develop a Travel Plan for submission with a planning application. A Travel Plan is a policy and action plan to: <ul style="list-style-type: none"> <li>o manage transport efficiently</li> <li>o improve access by all means of travel for employees, visitors, patients and students</li> <li>o encourage sustainable transport – walking, cycling, public transport and car sharing</li> <li>o reduce car use.</li> </ul> </li> <li>- A School Travel Plan is specifically designed to address the transport needs of pupils and staff and will vary according to the nature of the education being provided and the catchment area of the school.</li> </ul> <p>School safety zones would be set up to address health and safety concerns from increased traffic flows in the school vicinity.</p>		
3. <i>Promote health and wellbeing</i> by protecting and enhancing Public Open Space (POS) and improving access to POS	<b>0</b>	As the open space in and around a school site is not accessible to the public the only potential impact of the option on the open space would be loss of visual amenity value. There should be no impact as the proposed scheme is to refurbish and reconfigure internal spaces.	x	See comments next to SEA Objective 1 above

SEA objective			Do nothing	
	Rating	Commentary/ explanation of compatibility with SEA objective	Rating	Commentary/ explanation of compatibility with SEA objective
4. <i>Minimise</i> air, light and noise pollution associated with building development and traffic congestion	0	a) Those delivering the scheme would be encouraged to minimise air, light and noise pollution during any works.  b) To reduce congestion and associated pollution the following would be considered: <ul style="list-style-type: none"> <li>▪ Formalising the parking regime outside the school to discourage unsafe parking and help with enforcement.</li> <li>▪ The school agrees to a Travel Plan which includes schemes such as the Park Safe / Walk Safe scheme which encourage parents to park further away from the school.</li> </ul>	x	See comments next to SEA Objective 1 above
5. <i>Protect</i> and enhance biodiversity, flora and fauna	0	There should be no impact as the proposed scheme is to refurbish and reconfigure internal spaces.	x	See comments next to SEA Objective 1 above
6. <i>Protect</i> and enhance the landscape (habitats/visual amenities)	0	There should be no impact as the proposed scheme is to refurbish and reconfigure internal spaces.	x	See comments next to SEA Objective 1 above
7. Conserve water resources and increase water efficiency in new developments and promote sustainable urban drainage systems	0	This would not be in scope as the proposed scheme is to refurbish and reconfigure internal spaces.	x	See comments next to SEA Objective 1 above
8. <i>Promote</i> regeneration by delivering inclusive schools that will improve equality of opportunity and access for all	0	Achieved by making schools community focused - opening facilities to the public e.g. evening classes.  If the proposal were to proceed, an equality impact assessment would be carried out to consider the accessibility of the new building site. The equality impact assessment would take into account policies such as the Equality Act	x	See comments next to SEA Objective 1 above

SEA objective			Do nothing	
	Rating	Commentary/ explanation of compatibility with SEA objective	Rating	Commentary/ explanation of compatibility with SEA objective
		2010, TAN 12: Design 2014 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.		
9. <i>Protect and enhance</i> designated historic assets	<b>0</b>	There are no registered historic assets on the proposed new school site.	x	See comments next to SEA Objective 1 above

## Conclusion

The proposal has been assessed to be compatible with the environmental objectives used to assess the goal and principles of the "21st Century Schools: A Strategic Framework for A School Building Improvement Programme" that underpin school organisation proposals.

Where the assessment has identified a potential negative environmental impact in terms of an increase in the volume of traffic (Objective 4), measures to mitigate the effect are detailed.

is proposed to:

Increase the capacity of Ysgol Mynydd Bychan from c0.9FE (192 places) to 1.5 FE (315 places) from September 2022

- Consolidate Allensbank Primary School at 1FE (210 places), retaining nursery and ALN provision from September 2022

This page is intentionally left blank

**CARDIFF COUNCIL  
CYNGOR CAERDYDD**



**CABINET MEETING: 17 DECEMBER 2020**

---

**21<sup>ST</sup> CENTURY SCHOOLS, BAND B: EXPANSION AND REDEVELOPMENT OF CATHAYS HIGH SCHOOL**

**EDUCATION, EMPLOYMENT & SKILLS (COUNCILLOR SARAH MERRY)**

**AGENDA ITEM: 6**

---

**Reason for this Report**

1. To enable the Cabinet to consider a recommendation to hold public consultation on proposals for the expansion and redevelopment of Cathays High School in line with Band B 21<sup>st</sup> Century Schools priority schemes.
2. It is proposed to:
  - Expand Cathays High School from 1,072 places (5.5 Forms of Entry with 247 sixth form places) to 1,450 places (8 Forms of Entry with 250 sixth form places), from September 2023;
  - Replace the Cathays High School buildings with new build accommodation on the Maindy Centre site adjacent to Crown Way and North Road;
  - Expand the current Specialist Resource Base (SRB) for learners with Autism Spectrum Condition from 16 to 50 places in purpose-built accommodation in the new school buildings;
  - Upgrade community facilities in Cathays and Gabalfa through the significantly enhanced school facilities being made available for shared use with the wider local community.
  - Provide space for the local community to continue to have access to off-road open spaces for informal leisure use, recognising this is the current use at the Maindy site.

**Background**

3. At its meeting on 14 December 2017, the Cabinet approved the prioritised scheme under Band B of the Cardiff's Band B 21st Century Schools Programme.
4. The Band B programme seeks to address the most acute sufficiency and condition issues in Cardiff.

5. A copy of the 14 December 2017 Cabinet Report is included at Appendix 1.
6. The school has already temporarily expanded to take additional forms of entry to provide for larger cohorts currently promoting to year 7.

## **Issues**

### **Sufficiency of mainstream secondary school places city-wide**

7. Following a period of growth within the primary sector, there has been an increased demand for places at entry to secondary education city wide in the past five years. City-wide projections indicate that the demand for places in the English-medium secondary sector will further increase during the period of the Band B investment programme.
8. Citywide data from January 2020 shows the number of pupils in each of the year 3 to year 6 cohorts in English-medium primary schools exceeds the combined Admission Numbers of 3,460 places at entry to English-medium secondary schools.
9. Projections, based upon the most recent school census data (PLASC) received in 2020, indicate that the number of pupils entering Year 7 in English-medium community schools city-wide will continue to increase until the 2023/2024 academic year.
10. City-wide, peak intakes at entry to secondary education of c4,115 pupils are projected in 2022/ 2023 and 2023/ 2024, following which intakes reduce to c3,900. A significant reduction in pupils entering secondary education, from existing housing, is projected from 2028/ 2029.
11. However, it is anticipated that, as a result of the yield of pupils from the new housing developments, additional school provision will be required to provide school places local to the new housing in some parts of Cardiff.
12. Birth rate and population data currently available indicates a cyclic pattern in Cardiff, and nationally. Whilst school reorganisation proposals must be appropriate for projected pupil populations, an appropriate level of surplus capacity should be available to respond to population changes.

### **Condition & Suitability**

13. Cardiff has a very large education estate with over 127 school properties. Many sites comprise of multiple blocks, constructed during different decades. A large number of primary, secondary and special schools are in a poor state of repair.

14. Approximately £17m, or 14%, of maintenance and condition issues of the estate were addressed through Band A of the 21<sup>st</sup> Century Schools investment programme. There has been significant investment in the construction of two new high schools in the East and West of the City, new primary school provision and suitability works undertaken in primary schools.
15. As part of the prioritisation of schools within the Band B programme, all properties across the school estate were given a rating from A to D for the following issues, with D being the worst category:
  - Sufficiency of places available;
  - Condition of the school buildings;
  - Suitability of the environment for teaching.
16. Cathays High School is rated as “C” category for condition, which means the buildings are poor condition with major defects. A significant percentage of its accommodation is housed in demountable accommodation.

#### **Sufficiency of mainstream secondary school places**

17. When considering likely demand for places across the area, a number of factors have been used to inform projections and forecasts, including:
  - Recent and historic numbers on roll taken from verified PLASC (Pupil Level Annual Census) for Cardiff schools;
  - Recent and historic populations known to be living in each area utilising NHS data;
  - Recent and historic numbers and percentages of children attending English-medium and Welsh-medium community and faith places in Cardiff;
  - Recent and historic numbers and percentages of children transferring from primary schools in Cardiff to secondary schools elsewhere.
18. Forecasts have been prepared based on:
  - Current residential populations;
  - Likely child populations from the future residential developments currently in construction and proposed;
  - Likely demand if parental take-up patterns were to remain consistent with the most recent years applying these trends to the relevant populations in future years;
  - Likely demand if parental take-up patterns at entry to secondary schools were consistent with the type of primary school (English-medium community, Welsh-medium community or Faith) attended, applying this information to the relevant populations in future years.

19. Additional information, regarding projections and forecasts prepared relevant to the area, and the methodologies used to establish likely demand are set out in Appendix 2.

## **Summary of recent and forecast demand for places at entry to secondary education**

### **Cathays High School Catchment Area**

20. The Cathays High School catchment area comprises the primary school catchment areas of Allensbank Primary School, Albany Primary School and Gladstone Primary School, which serve Cathays and parts of Gabalfa, Heath, Llandaff North and Plasnewydd. The area is also served by Ysgol Mynydd Bychan, St Joseph's Catholic Primary School, St Peter's R.C Primary School and St Monica's Church in Wales Primary School.
21. The recent take-up of English-medium community primary school places by children who are resident within the existing Cathays High School catchment area has averaged 108 per year group. This has fluctuated between 82 and 133 pupils in the period 2016 - 2020.
22. The average intake over the last 3 years at entry to Reception year within the Cathays High School catchment area is 117 pupils (approximately four Forms of Entry). Whilst this level is seen to drop off slightly, there is expected to be a degree of demand from new housing on a citywide level. Data is not yet available for cohorts that would enter primary education beyond 2024/25.
23. The numbers of pupils in some primary school year groups, resident within the catchment area of Cathays High School, have fluctuated significantly. Cohorts have increased or reduced in number by between 11-48 pupils (on average 24% changes within cohorts). Migration patterns are not consistent which represents a risk when planning the number of secondary school places.
24. On average, 91 children per year group have transferred to English-medium community secondary schools and 33 children per year group have transferred to English-medium faith-based secondary schools in recent years. The remaining young people transfer to Welsh-medium secondary schools.
25. There is no significant difference in the number of children in Year 6 cohorts and in the following year's Year 7 cohorts in this area - i.e. almost all children resident in the area continue to attend community or faith schools in Cardiff when they transfer to secondary education.
26. Forecasts indicate that, in the Band B investment period, 68-105 English-medium community secondary school places will be required to serve the existing Cathays High School catchment area, either at the school or at other English-medium community schools. This takes

account of c33 places being taken up within Faith-based schools by pupils resident in the area. Intakes peak in 2024 but reduce thereafter to approximately 2.3 forms of entry.

27. There are no large planned residential developments within, or in close proximity to, the Cathays High School catchment area that would significantly increase the child population within the area. There are also no significant housing developments currently planned nor included with in the adopted LDP for the Cathays area.
28. Taking the above information into account, an English-medium community secondary school of three forms of entry, providing 90 places per year group, would be sufficient to serve the existing Cathays High School catchment area during the Band B investment period and in the years immediately following. However, planned housing in the south of the city will significantly increase pupil numbers at neighbouring schools including Cathays High School.

### **Other areas**

29. The five secondary schools included in Cardiff's Band B 21<sup>st</sup> Century schools programme, including Cathays High School, are proposed to expand from a combined capacity of c35.5 forms of entry to c44 forms of entry. These proposals take account of the projected increasing intakes to secondary education in a number of areas of Cardiff in the period until 2024, and the continuing need for these places in the period that follows.
30. Cardiff's expected level of growth in this period, in existing communities, is significant. It is evident that, separate to pupil forecasts based on existing housing, additional secondary school places will be required to accommodate children from new housing developments in the catchment areas of some existing schools.
31. Dwelling completions in Cardiff have significantly increased in recent years. The 1,444 completions in 2018/19 (43% higher than 2017/18) contrast with the previous 9 years where completions averaged 725 units per annum, with no year above 1,000 units for this period. Construction has now started or is about to start on most of Cardiff's strategic housing sites and it is expected that housing completions over the remaining 6 years of the Local Development Plan period will increase significantly.
32. The 2019 landbank for housing in Cardiff numbered 24,944 dwellings. Approximately 1,600 additional dwellings in Butetown, 1,800 in Grangetown, 800 in Canton, 600 in Llandaff and 700 in Cathays (mainly in the city centre) have planning permission or are on sites allocated in the LDP. Each of these communities lie within the catchment areas of the schools included within the Band B programme.
33. As detailed in Appendix 2, the city-wide forecast demand for places at entry to secondary education from existing housing will increase by circa

- 150 children per year group within the Band B investment period, until 2024, as a consequence of larger cohorts promoting from primary education, and reduced outflow to out of county provision.
34. The current and projected demand for places at entry to secondary school within the neighbouring catchment areas of Cardiff High School and Fitzalan High School exceed the number of places available at each school. The projected demand from existing housing within the catchment area of Llanishen High School is at a high level but is expected to increase further within and beyond the Band B period as new housing is developed between the communities of Lisvane and Pontprennau.
  35. Planned housing developments within the Fitzalan High School catchment area, including those with outline or full planning permission, will impact neighbouring English-medium community schools, including Cathays High School, and must be considered when planning provision. Retaining Cathays High School at its existing capacity of 5.5 forms of entry, or a minor expansion to six forms of entry, would not be sufficient to meet the demand from within its catchment area and the excess demand from within the neighbouring catchment area of Fitzalan High School.
  36. A temporary increase to the admission number at Cathays High School, to eight forms of entry in Year 7 (240 places), was implemented for the 2020/21 intake, and all places were allocated. The central location of the school enabled it to meet the excess demand for places, and to accommodate late applicants, from the south, central and north areas of the city and retain less than 5% surplus city-wide in the year group. Similar measures, retaining the intake at Cathays High School to 240 places, are likely to be needed in coming years.
  37. It is expected that the Cathays High School would be fully subscribed at entry to year 7, based on pupil populations in the wider area, until at least 2024, and the school would have eight forms of entry enrolled in some year groups until at least 2028.
  38. A permanent expansion of Cathays High School to eight forms of entry would provide an opportunity to meet the projected demand for places from within its catchment area and to also accommodate excess demand for places from other neighbouring catchment areas. The central location of the school within the city, and its catchment area being adjacent to catchment areas of five other English-medium community secondary schools of Cardiff High School, Fitzalan High School, Llanishen High School, Whitchurch High School and Willows High School, means that it is well placed to support growth in other areas of the city.
  39. Consultation on changes to English-medium community secondary school catchment areas would be required at the appropriate time in

order to provide a suitable balance in the supply of and take-up of places. Catchment areas are only part of the school admission oversubscription criteria and being resident within a catchment area is not a guarantee of admission. The Council has to ensure sufficient place in the secondary sector regardless of catchment boundaries.

### **Additional Learning Needs (ALN) Provision**

40. At present, both secondary and primary schools in Cardiff host Specialist Resource Bases (SRB). The purpose of an SRB is to enable learners with additional learning needs to succeed in a mainstream learning environment. Pupils are supported to attend mainstream lessons and benefit from the full range of educational opportunities available to all pupils at the school.
41. A Specialist Resource Base for pupils with Autism Spectrum Condition (ASC) is located at Cathays High School and supports up to 16 pupils aged 11-18.
42. The SRB staff provide additional pastoral and teaching support to the pupils, and provide training and information to main school staff to support the inclusion of young people. The SRB has designated accommodation where the pupils may access small group or individual teaching. The base also provides a nurturing and 'safe' environment for young people when it is required. The provision provided to the young people is tailored, according to need. Young people experience short or prolonged periods where they are taught mainly or solely in the SRB, because of anxiety or sensory challenges, or as part of a transition from a more specialist environment.
43. The majority of children with an autism spectrum condition do not require a special school place in order to learn and thrive. Young people attend a local mainstream school and access additional support through the specialist resource base.
44. Although the Council increased ASC places between 2012 and 2017, from 82 to 140, it is anticipated that demand for ASC SRB places will continue to grow over the next 5-10 years. Due to increased demand, and the shortage of specialist ASC places in Cardiff, separate proposals have been brought forward to expand another existing ASC base at Cantonian High School.
45. It is proposed to retain the SRB at Cathays High school, as part of the future school, to ensure continued provision for current and future pupils. The current expertise and inclusive practice of the school would be maintained. Additional places would help to ensure there are sufficient places to meet increased demand arising out of a growing pupil population and a growing incidence and identification of ASC in Cardiff.
46. The proposed expansion of Cathays High School in new build, 21<sup>st</sup> Century accommodation presents an opportunity to further develop the

specialist provision within the school and to increase the number of places available from 16 to 50.

47. Cardiff Council is committed to the principles of inclusion and recognises that the majority of children and young people with additional needs are best supported in their local mainstream schools. The Council will continue to provide support, training and resources to schools, promote the sharing of best inclusive practice and ensure that learners with ALN access effective support in their local school.

### **Mutual Investment Model (MIM)**

48. MIM is a national scheme that has been developed to borrow funds via the private sector to design and build the school, and maintain the building fabric over a 25 year period. Welsh Government has procured a Private Sector Delivery Partner (PSDP) to work with it on the delivery of education and community facilities. The successful bidder was Meridiam Investments II SAS. The PSDP and a subsidiary of the Development Bank of Wales have entered into a Special Purpose Vehicle (SPV) called WEPCo, which will deliver the services to participants.
49. At its meeting on 16 July 2020, Cabinet agreed to enter into the Strategic Partnering Agreement (SPA) with WEPCo. Cardiff Council, along with other local authorities and further education institutions, are a participant to the SPA. The SPA provides for how the parties act together over the long term in a collaborative partnering, non-adversarial and open manner to support the effective planning, procurement and delivery of education and community facilities in Wales and the delivery of infrastructure services. This includes partnering services for the project such as legal, design and technical advice.
50. WEPCo will undertake all partnering services (i.e. the design, project development and professional services). Approved MIM Projects will be developed by WEPCo, but delivered (including hard facilities management) by Project Co which will enter into a Project Agreement with the Council to deliver the relevant MIM Project. The Council will be a contracting party with Project Co which will have contracts in place to manage the building and facilities contractors.

### **Land Matters including improving community facilities**

51. The Cathays High School site is located on a site measuring approximately 2.1 hectares, adjacent to North Road and Crown Way. The constrained school site limits access for pupils to outdoor facilities and does not include any school pitch provision for pupils.
52. Formal arrangements exist at present for Cathays High School to use grass pitches at Heath Park, and transport arrangements are in place to support this at an annual cost to the Council of c£21,000.

53. The Maindy Centre, including the indoor leisure centre and pool, the Maindy Cycle and BMX track, and outdoor football pitches, is located in close proximity to the school on the opposite side of Crown Way, also adjacent to North Road.
54. The Maindy cycle track was built for the British Empire and Commonwealth Games in 1958 and has been home to the Maindy Flyers Cycling Club since 1995. The club has approximately 200 members aged 5 to 18 years old. Cardiff's Road Safety Centre, providing adult and child cycle training, is also located at the Maindy site.
55. Maindy Centre is Cardiff's only outdoor cycle track that is the home of the grassroots cycling talent in the city. The track is a popular outdoor venue that requires investment. Whilst the cycle club has outgrown the facility, the Council acknowledges that Cardiff must continue to support its home-grown talent to excel and progress to represent Wales competitively on the international stage.
56. The school project provides an opportunity for a new track facility, located in the heart of Cardiff Bay at the International Sports Village, to be brought forward in the New Year, bringing a greater range of cycle track opportunities to our capital.
57. The construction of new facilities for Cathays High School on the Maindy Centre site and potentially on a proportion of the existing site in line with Building Bulletin 98 will enable the expansion of the school in an area that is well located within the community that the school serves.
58. The Council agreed in 2016 that the leisure and sporting facilities at Maindy Centre would be operated by Better Leisure (GLL), and a long term lease arrangement is in place. As part of a revised lease the school will continue to have access to indoor facilities at Maindy Centre an arrangement will be explored with GLL for the management of external sports facilities and shared use of the carpark outside of the school day.
59. The location of the sites, off North Road and Crown Way, provide an opportunity to enable the new investment in the community. The design of the school will support open community access to some multi use games areas outside of school hours and re-provide community land where possible. The land south of the existing Maindy cycle track and other areas will be made available for exercise; dog walking; [access between Gelligaer Street and Crown Way/North Road](#); and general leisure activities. The BMX track is expected to be retained, but could potentially be relocated elsewhere on the Maindy or current school site should it be deemed beneficial to the project and the community. The existing playground will sit outside of the scope of the project and will be retained. There are further opportunities presented by the levels and existing conditions of the site which provide opportunities for a holistic landscape design that incorporates sustainable drainage, ecology and habitat strategies.

60. The proposed strategy to provide a combination of all-weather pitches on-site and retaining current grass pitches at Heath Park would enable curriculum requirements to be met, providing pupils with access to a range of facilities for a variety of sports.

### **Admissions and Catchment areas**

61. There are no plans to change the Council's policy on the admission of children to schools, as a result of this proposal.
62. In accordance with the limitations set out within the School Organisation Code, the Council has agreed a temporary increase to the Admission Number at Cathays High School to meet the increased demand for places. The Council is able to continue to do so but cannot exceed the school's total published capacity of 1,072 places, using temporary measures, by more than 200 pupils.
63. It is proposed that the admission number of 240 places would be implemented from September 2023, in accordance with the requirements set out in the School Organisation Code.
64. Detailed information regarding admission arrangements is contained in the Council's Admission to Schools booklet, and this information can be viewed on the Council's website ([www.cardiff.gov.uk](http://www.cardiff.gov.uk)).
65. Consultation on changes to English-medium community secondary school catchment areas would be required at the appropriate time, in order to provide a suitable balance in the supply of and take up of places.
66. The Council will manage admissions to the Specialist Resource Base provision at Cathays High School in accordance with the ALN Code of Practice, which takes effect from September 2021.

### **Partnerships**

67. The 'Cardiff Commitment' is the Council's youth engagement and progression strategy. The Cardiff Commitment sets out how the council, together with a wide range of public, private and third sector partners, will work together to ensure a positive destination for every young person in Cardiff after they finish school, either in employment or further education and training.
68. To date over 120 businesses have pledged to support Cardiff Commitment and provide opportunities to schools and young people, better preparing them for the world of work, contributing to the future economic growth of the city.
69. The Council's proposals for Band B of the 21<sup>st</sup> Century Schools Programme and the Cardiff 2030 strategy clearly state the link between

improving the environment for learning and raising standards of achievement.

70. The Council is keen to assist with the development of opportunities between schools and businesses, to help create a sustainable pool of talent for future workforce needs, and spread skills across the city. An example of this is the Creative Education Partnership that has been established between Cardiff West Community High School and partners from the creative industries to provide opportunities for young people to leave education with skills and competences and to be work ready.
71. The significant school developments proposed would provide opportunities for strong partnerships with businesses and employers from a range of sectors in the Cardiff economy. Opportunities for further partnerships are being explored and will be progressed in line with the priorities set out in the Cardiff Commitment.

### **Impact of the proposal on the Welsh Language**

72. It is not anticipated that there will be any negative impact on the Welsh Language, as a result of this proposal.
73. The teaching of Welsh within an English medium setting is subject to the requirements of the National Curriculum. This would not change with the expansion of the school. This proposal does not seek to change the number of Welsh-medium primary or secondary school places available in the area.
74. The Council works closely and constructively with partners on its Welsh Education Forum, which includes representatives of nursery, primary, secondary and further education, childcare, RhAG and the Welsh Government. The Forum actively informs the planning of Welsh-medium places, to continue to drive the Council's plan to sustainably increase the number of learners within Welsh-medium schools and those learning Welsh in English-medium schools.
75. The council monitors birth rates, the yield from proposed housing and the patterns of take-up in Welsh-medium provision at primary and secondary age, with a view to bringing forward appropriate plans to meet any increased demand.
76. Whilst forecasts, based on the number of children in the Welsh-medium primary, indicate that additional capacity will be required to meet the demand for places in Welsh-medium secondary schools, separate proposals will be brought forward at the appropriate time to ensure there are sufficient places available.
77. The Council, and its partners on the Welsh Education Forum, are committed to driving the increase in number of pupils educated through the medium of Welsh, to meet the targets within Cardiff's WESP, and to meet the targets set out in the Welsh Government's Cymraeg 2050 strategy.

78. The Council must ensure that the expansion of school provision is brought forward in a strategic and timely manner, which does not compromise existing provision. Expanding Welsh-medium secondary school provision would, inevitably, have an impact on the take-up of places in other schools, and in turn on the ability of schools to balance budgets and to attract or retain staff.

### **Learner Travel Arrangements**

79. There are no plans to change the Council's transport policy for school children.
80. Any pupils affected by the proposals would be offered the same support with transport as is provided throughout Cardiff in line with the same criteria that apply across Cardiff.
81. The Council's transport policy for school children can be viewed on the Council's website [www.cardiff.gov.uk/schooltransport](http://www.cardiff.gov.uk/schooltransport).
82. Transport may continue to be required for timetabled sports activities on Heath Park as at present, with the need and frequency of provision to be confirmed. There may need to be appropriate provision on the school site for a coach to park and turn round.

### **Community Impact**

83. The following are taken into account when considering a proposal: Public Open Space, parkland, noise and traffic congestion. Officers will work with schools, local members and any community group to make sure that the proposal avoids negative impacts if possible.
84. Cathays High School enables a number of community organisations to make use of its site outside of school hours. These organisations will be consulted on the proposed changes and consideration will be given to how to support these organisations in the proposed new build school.
85. The open space at Maindy is currently used for informal leisure by the local community – exercise, dog walking, access between Gelligaer Street and Crown Way/North Road, and general leisure activities. It is recognised this is one of few open spaces for residents in Cathays, Maindy, and Gabalfa and therefore the new development will provide space and access for the community to continue these informal activities in community green spaces. In addition, it is proposed that the playground at Gelligaer Street will remain, the BMX track for community use will be retained or relocated elsewhere on the Maindy or current school site, and open-access MUGA's will continue to be provided.
86. With significant sports and wider leisure provision now established, or being developed, in many schools a key objective is to enable third party to access the sports facilities at schools, on a sustainable financial basis.

Welsh Government's aim for shared facilities in community-focussed school are to:

- Provide opportunities for the local community and sports organisations to participate in sport and physical activity for health improvement and development of their skills, particularly amongst low participant groups;
- Operate in line with the national agenda for sport taking into account nationally adopted strategies;
- Generate positive attitudes in sport and physical activity by young people and reducing the dropout rate in sports participation with age;
- Increase the number of people of all ages and abilities participating in sport and physical activity including people with disabilities;
- Use the facilities to encourage the range, quality and number of school sports club links and to stimulate competition that is inclusive of young people and adults;
- Provide affordable access to the facilities and to be self-financing and cost neutral in the first instance, generating sustainable income for the school in the future.

87. The development of a viable model for all schools across the city to be accessed by the communities which they serve is needed.

### **Wellbeing of Future Generations**

88. In line with the Well-being of Future Generations Act Cardiff's Band B programme is committed to providing Local Schools for Local Children, together with encouraging use of sustainable modes to travel to schools, such as walking and cycling. Each School project takes into account key transport issues when they are being designed and the firm need to provide safer routes to encourage walking, cycling and other active travel modes to schools.

89. With the current investments in ICT across the city, student movements may be further reduced as mobile technology develops further allowing for flexible teaching methods. These have the potential to result in a more efficient Travel Plan and further contribute to the Council's targets to reduce its carbon emissions.

90. In order to maximise the long-term impact of this significant investment, any design taken forward for each school included in this proposal would be developed to ensure the delivery of high quality modern facilities that are able to respond to the current pupil populations needs and support the delivery of effective teaching and learning methods. They would also incorporate the flexibility to take account of changes depending on need as time progresses; such as changing demographics and pupil numbers, changing curriculum and changing types of pupil needs.

91. The project will consult with all statutory bodies when developing a planning application to ensure that environmental and biodiversity impacts are fully considered.

## **Reason for Recommendations**

92. To meet the demand for English-medium secondary school and post 16 places in the Cathays High School catchment area and neighbouring communities, and to meet demand for additional Specialist Resource Base (SRB) places for learners with Autism Spectrum Condition city-wide.

## **Financial Implications**

93. The recommendations to this report request approval for a consultation process to be undertaken in relation to the proposed scheme for Cathays High school. A decision to initiate a consultation process does not, in itself, commit the Council to any capital expenditure commitments and, therefore, there are no capital financial implications directly arising from this report. Should the scheme be taken forward, it will be necessary for a full financial evaluation to be undertaken. The aim of this will be to provide assurance that the scheme remains affordable once all relevant costs and contingencies for potential changes in delivery timescales have been incorporated.
94. The preferred funding strategy for this particular scheme remains the WG's revenue funded Mutual Investment Model (MIM). This will mean the new building will be constructed via a Special Purpose Vehicle and the Council will make a net contribution of 19% (with WG providing 81% of the revenue funding required) towards the annual unitary charge for a period of 25 years. The funding required for the Council's contribution will be made available via the SOP Revenue Reserve, which also meets revenue costs arising in relation to programme delivery and capital financing.
95. Other capital costs, including those directly connected to the new school, such as FFE and ICT, as well as other costs not directly connected to the new building, such as associated transport infrastructure works, will not qualify for MIM funding. These costs may still be within the scope of the 21st Century Schools Programme and in such an instance will be funded via the traditional capital route, with WG contributing towards 65% of the costs. Further work is required to understand the full extent of these particular costs, however the Band B Capital Programme currently includes an estimated allocation for these works that will need to be balanced against other Band B priorities. In addition, any capital required for maintaining the current schools in the interim will need to be met from within existing resources.
96. As well as the capital expenditure commitments directly connected to the main scheme, there would also be capital expenditure incurred in relation to the replacement cycle track. Use of MIM funding would not be available for such uses and therefore funding will need to be identified from within existing Council resources or match-funded via external grant funding, if applicable. Further to the capital costs of the main school build, there would also be significant revenue expenditure implications,

both connected to the project delivery and on an ongoing basis, once the new facility is operational.

97. Further consideration may be required in future reports in relation to the Maindy Pool site and car park, particularly in relation to current lease arrangements and potential VAT impact. Additional advice will be sought as appropriate as plans for the new school are developed and any additional costs arising absorbed within the overall envelope for the scheme.
98. There continues to be a significant risk surrounding the planned achievement of capital receipts underpinning the overall Band B programme. The total target of £25 million in the current financial model is required prior to the end of 2023/24. Work is being undertaken to ensure that this target remains achievable as a means to secure the affordability of the overall programme.

### **Legal Implications**

99. Under the Education Act 1996, the Council has a general statutory obligation to promote high standards of education and to provide sufficient school places for pupils of compulsory school age.
100. Parents have a right to express a preference for the school they wish their child to attend under section 86 of the School Standards and Framework Act 1998. This does not provide a right to attend a certain school, as applications can still be refused for admission where this would prejudice the provision of efficient education or the efficient use of resources.
101. A local authority can make proposals to alter a community school under section 42 of the Schools Standards and Organisation (Wales) Act 2013. The Council is required prior to publishing its proposals to undertake a consultation on those proposals in accordance with section 48 of that Act and the School Organisation Code 2018. The proposal is a regulated alteration under paragraph 2.3 of the School Organisation Code 2018. The recommendations seek authority to carry out that statutory consultation. Any proposals must be the subject of full and fair consultation and due regard must be had by the Cabinet to the responses before a final decision is taken. As these proposals affect sixth form provision, they will require the approval of Welsh Ministers in accordance with section 50 of the Schools Standards and Organisation (Wales) Act 2013 and paragraph 5.2 of the School Organisation Code 2018.
102. Catchment areas and published admission numbers of schools are part of the Council's admission arrangements and therefore the statutory consultation within the School Admission Code and the Education (Determination of Admission Arrangements) Regulations 2006 would need to be followed if following consultation these proposals are taken forward.

103. The decision about these recommendations has to be made in the context of the Council's public sector equality duties. The Council also has to satisfy its public sector duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The Protected characteristics are: age, gender reassignment, sex, race – including ethnic or national origin, colour or nationality, disability, pregnancy and maternity, marriage and civil partnership, sexual orientation, religion or belief – including lack of belief. If the recommendations in the report are accepted and statutory notices are published, the Council will have to consider further the equalities implications and an Equality Impact Assessment may need to be completed.
104. The Council has to be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards when making any policy decisions and consider the impact upon the Welsh language.
105. The Council has to consider the Well-being of Future Generations (Wales) Act 2015 and how this strategy may improve the social, economic, environmental and cultural well-being of Wales.

#### Traffic Regulation

106. The Council as the 'Traffic Authority' has a discretionary power to make 'traffic regulation orders' where it appears to the Council expedient to make the order for any of the purposes specified under Section 1 of the Road Traffic Regulation Act 1984 Act ("the 1984 Act").
107. Full legal advice should be sought on the proposed traffic regulation orders, as the same are developed but it should be noted that in making any traffic regulation order the Council must comply with the procedure set out in the Act and the regulations made there under. This process involves at statutory consultation exercise, with associated rights of objection. If objections are received, they must be duly considered and following such consideration the potential exists that the traffic regulation order may be made, be made but in modified form or not proceeded with at all.

#### HR Implications

108. The proposed expansion of Cathays High School will require the Governing Body to consider their workforce requirements in readiness for expansion and in the event that any vacancies arise, these should be considered as redeployment opportunities for staff on the school redeployment register. In addition, full consultation with staff and trade union colleagues will be needed to ensure there is a smooth transition into the new school building.

109. Further HR implications of the proposal will need to be determined as the project develops, particularly in relation to the operation of the MIM scheme outlined above. Further guidance is required from Welsh Government to understand the full working arrangements in relation to facilities management to assess the impact, if any, on current school staff. The Governing Body and the school's leadership team will also need to consider whether any staffing changes are required to support the use of school premises by the wider community. HR People Services will provide this advice and support as necessary.

### **Traffic and Transport implications**

110. The Council's policy is to increase the overall share of daily journeys that are made by sustainable modes of transport – walking, cycling and public transport. Many journeys to school are very short. 75% of journeys to education in Cardiff are within 3km of people's homes. More of these journeys could be made by active modes if improvements could be made to the safety of roads and routes for walking and cycling within school catchment areas. The health and wellbeing benefits of enabling children to travel actively and independently to school, as opposed to being escorted by car, are well documented and evidenced.
111. This proposal will increase educational activity on this site through the expansion of mainstream and SRB places. The expanded provision will result in additional trips to the site, which have the potential to add/alter existing pressures on the local highway network.
112. The current target for journeys by sustainable modes of transport (contained in the adopted Local Development Plan) is to achieve a 50:50 split between journeys by car and journeys made by foot, cycle and/or use of public transport by 2026. This will be achieved by ensuring that new development is fully integrated with transport infrastructure which mitigates the transport impacts and maximises opportunities for travel by sustainable modes. It is important that this new school facility fully reflects the Council's transport policies and makes a positive contribution to modal shift.
113. This can be achieved by ensuring that the design and layout of buildings and the site access arrangements prioritise travel by active and sustainable modes. Other critical elements will be the location of access points in positions which take account of the alignment surrounding network of roads and pathways and which serve to minimise walking and cycling distances and avoid unnecessary detours for people travelling on foot and by bicycle. The provision of on-site facilities, such as secure cycle parking spaces and lockers for storage of cycling clothes and equipment will also be essential.
114. Cycle parking provision must meet the minimum requirements set out in the Council's Managing Transport Impacts SPG and the site must be able to accommodate increases in cycle parking to meet future demand.

115. Cycle parking must be covered and secure and be sited in a convenient location within the site which is easy for pupils for access and where it benefits from surveillance. Sheffield stands are recommended. Tiered cycle parking will not be acceptable.
116. Vehicular access to the school site will need to be limited to staff and vehicles requiring access for essential servicing. The SRB pupil learner transport will need appropriate suitably segregated facilities for drop-off and pick-up. However, facilities for general pick up and drop off of other pupils by car should not be provided.
117. On-site parking should be in accordance with the Council's Managing Transport Impacts Supplementary Planning Guidance (2018). The parking requirements for schools within the SPG is one parking space per 30 pupils and this would apply to the mainstream school provision at the site. Parking on street near the school will be discouraged through the introduction of appropriate parking restrictions. The Council is currently introducing School Streets in selected suitable locations; the use of Traffic Regulation Orders to restrict vehicular access on streets outside schools at morning drop-off and afternoon pick-up times. This approach could potentially be used to restrict parking and access associated with the new school.
118. Transport mitigation for the development will be identified through the Transport Assessment (TA) process, which will inform the proposals submitted for planning permission.
119. The first part of the TA, a Traffic Impact Assessment (TIA), has now assessed the traffic impact on the highway network due to potential changes to the existing road layout and also including the proposed construction of Cycleway 1 in the vicinity of the school. The TIA has identified that potential changes are expected to result in some additional queuing at peak periods however it is considered that the overall traffic impact of the development can be accommodated by the network.
120. The expansion of Cathays High School, utilising the Maindy Centre site and the existing school site may necessitate the closure of part of Crown Way to vehicles. Road layout changes may involve traffic orders and associated legal processes, both requiring sufficient lead-in time and financial resources.
121. The subsequent completion of the full TA will identify necessary works associated with required vehicular access onto the site and off-site highway measures including any safety measures, traffic calming and facilities for pedestrians, cyclists and scooting including crossing facilities for all active travel modes. The transport team requires very early engagement with the designers and transport consultants for the project to ensure that appropriate facilities to support sustainable travel

are considered at the outset of the project and incorporated into the site master plan.

122. In addition to highways measures within the immediate vicinity of the school gates, this work will need to identify other off-site improvements, including linkage with existing active travel routes and the provision of new routes, necessary to maximise opportunities for pupils to travel to school by walking, cycling and scooting, and for those using public transport.
123. Currently no pupils (other than SRB pupils) are eligible for learner transport and so appropriate provision needs to be made for use of public transport services. This will include safe and sufficient waiting facilities for pupils using scheduled and additional school bus services and safe pedestrian access to appropriate bus stop facilities at locations convenient to the school, with crossings appropriate to the desire lines, type and level of use.
124. The Council is committed to ensuring that every school in Cardiff has an Active Travel Plan by 2022. Such a plan identifies actions by the school to support and encourage active travel to school and will also identify any improvements to on-site and off-site infrastructure required to facilitate active journeys.
125. All schools developed under Band B will need to have such a plan in place from the outset of their operation. The Active Travel Plan for the new Cathays High School should be informed by the Transport Assessment and developed with full involvement of the pupils and staff on the existing Cathays High School site and pupils and staff in the feeder school populations. The Active Travel Plan for the new school should be linked to the Active Travel Plans for the feeder or cluster schools. This will help to encourage active travel across each age group and ensure that all pupils entering the new Cathays High School are equipped with the skills they need to travel to school by active modes. The Council's Active Travel Plans officers can support the development of the Active Travel Plan.
126. Other support can be offered through the Council's Road Safety Team which delivers National Standards Cycle Training to schools in Cardiff.

### **Property Implications**

127. The Strategic Estates Department are part of the project team for delivery of the new Cathays High. Considerations have been given to the existing leasing arrangements with Maindy Leisure Centre, relocation of the Velodrome and any disposal opportunities from surplus land to support the capital programme.
128. Where there are resultant land transactions, further negotiations or valuations required to deliver these proposals, they should be done so in

accordance with the Council's Asset Management process and in consultation with Strategic Estates and relevant service areas.

## **Equality Impact Assessment**

129. An initial Equality Impact Assessment has been carried out. It concluded that the proposed changes would not negatively affect a particular group in society. This assessment will be reviewed after the consultation. Further equality impact assessments would also be carried out if the proposal goes ahead.

## **RECOMMENDATIONS**

Cabinet is recommended to:

1. authorise officers to consult on proposals to:
  - Expand the school from 1,072 places (5.5 Forms of Entry with 247 sixth form places) to 1,450 places (8 Forms of Entry with 250 sixth form places) from September 2023;
  - Replace the Cathays High School buildings with new build accommodation on the Maindy Centre site adjacent to Crown Way and North Road;
  - Expand the current Specialist Resource Base (SRB) for learners with Autism Spectrum Condition from 16 to 50 places in purpose-built accommodation in the new school buildings;
  - Upgrade community facilities in Cathays and Gabalfa through the significantly enhanced school facilities being made available for shared use with the wider local community.
  - Provide space for the local community to continue to have access to off-road open spaces for informal leisure use.
2. Note that officers will bring a report on the outcome of the consultation to a future meeting to seek authorisation as to whether to proceed to publish proposals in accordance with section 48 of The School Standards and Organisation (Wales) Act 2013.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Melanie Godfrey</b> <b>Director of Education &amp; Lifelong Learning</b>
	11 December 2020

*The following appendices are attached:*

Appendix 1: Cabinet Report, 14 December 2017

Appendix 2: Projected availability of and demand for secondary school places

Appendix 3: Statutory Screening Tool including Equality Impact Assessment

**CABINET MEETING: 14 DECEMBER 2017**

---

**21<sup>ST</sup> CENTURY SCHOOLS CARDIFF COUNCIL'S BAND B  
PRIORITIES**

**REPORT OF DIRECTOR OF EDUCATION AND LIFELONG  
LEARNING**

**AGENDA ITEM: 4**

---

**PORTFOLIO: EDUCATION, EMPLOYMENT & SKILLS (COUNCILLOR  
SARAH MERRY)**

**Reason for this Report**

1. To seek Cabinet approval for the priority schemes to be undertaken as part of Cardiff's Band B 21st Century Schools Programme.
2. To note the approval in principle by Welsh Government of the Strategic Outline Case submitted by Cardiff Council for Band B of the 21<sup>st</sup> Century Schools Programme and to authorise discussion with the Welsh Government to secure business case approval for individual schemes.

**Background**

3. At its meeting on the 12<sup>th</sup> of October 2017, the Cabinet received a report which outlined the challenges and opportunities facing Cardiff in the development of the education estate. This included:-
  - Sufficiency needs resulting from population growth.
  - Condition of the current school estate;
  - Suitability of the current estate to meet the demands of 21<sup>st</sup> century learning.
4. That report set out the Council's proposed vision for its Band B 21<sup>st</sup> Century School Strategy in that it was to deliver:

*"Inspiring, sustainable, community-focused schools in which children and young people can achieve their potential"*

5. This vision was to be realised through the achievement of four key educational aims that directly link to the Welsh Government's national programme objectives:-
  - Aim 1: To provide a sufficiency of school places across the city that are in the right place and are at the right size to enable the delivery of excellent education provision.
  - Aim 2: To provide high quality educational facilities that will meet the diverse requirements of the 21st Century.
  - Aim 3: To optimise the use of education infrastructure for the benefit of the wider community across Cardiff.
  - Aim 4: To ensure that Cardiff achieves best value from its resources to improve the efficiency and cost effectiveness of the education estate.
6. The report outlined the sufficiency, suitability and condition issues in Cardiff which provide the basis of the funding request from Cardiff to Welsh Government under the Band B programme. The Band B phase of the 21st Century Schools Programme will commence in April 2019 and is scheduled to run until 2024.
7. Funding was therefore required to enable the Council to address the following priorities:-
  - Remove all "D" condition, end of life, school properties;
  - Address the eight form of entry sufficiency issue in the English medium secondary sector in the central area of the city;
  - Address the sufficiency, condition and suitability issues in the special sector, in both primary & secondary settings;
  - Address local sufficiency issues in welsh medium primary schools in the east and west of the city;
  - Address local sufficiency issues in english medium primary schools in Cardiff Bay and west of the city.
8. It was agreed at this meeting that the proposed schemes for Cardiff under the Band B phase of the 21<sup>st</sup> Century School Programme would be the subject of a Cabinet report, once the budget allocation from Welsh Government was known.
9. The Cabinet Secretary for Education, Kirsty Williams, announced on 10 November 2017 that £2.3bn had been earmarked to modernise education infrastructure in Wales. The announcement confirmed that Welsh Government is committed to supporting projects submitted in the Outline Strategic Business Cases by local authorities and further education institutions, subject to the approval of business cases for specific schemes.
10. The value of the programme submitted by Cardiff Council was £284 million, of which half would be funded by Welsh Government, and half by the Council. Welsh Government have subsequently confirmed approval in principle of the programme envelope for this sum, subject to the

approval of individual project business cases. This report outlines the proposed schemes in Cardiff under this programme.

### **Proposed Band B Schemes**

11. The Band B submission for 21<sup>st</sup> Century funding can only seek to address the most acute sufficiency and condition issues in Cardiff. Using a detailed and robust methodology that was directly aligned to Welsh Government's Strategic Objectives for its 21<sup>st</sup> Century School Programme, a prioritisation matrix was developed to identify those schools in the most need of investment. All properties across the school estate were given a rating from A to D for the following issues, with D being the worst category:
  - Sufficiency of places available;
  - Condition of the school buildings;
  - Suitability of the environment for teaching.
12. The sufficiency ratings for all schools were prepared using the corporate population database and projection methodology used for the planning of school places. The condition and suitability rating were prepared independently, using Welsh Government approved methodology via independent specialist.
13. Welsh Government is committed to removing all "D" condition schools from Wales. Any schools that are classified as "D" category for condition should be automatically prioritised for investment under Band B.
14. Any project to increase the size of a school establishment, change its configuration or location will require statutory consultation and Cabinet determination. The statutory consultation would set out the detailed proposals and proposed location for each scheme. It would also indicate whether there were any proposed co-locations with other educational establishments. It is important that these are considered in full, alongside any collaborative opportunities, in order to optimise the economies and educational benefits that can be delivered from the projects. It is anticipated that any statutory consultation on the matters in this report this would commence during the spring of 2018.
15. It should be noted that because of the scale and number of proposed projects in the Band B investment programme, the delivery of the schemes will be undertaken in batches over the timespan of the programme commencing in 2019. As a result of the phasing, it may be necessary to put interim measures in place where sufficiency issues arise before new schools with increased capacity can be delivered.

### **Secondary schools - proposed Band B schemes**

16. To address the eight form of entry sufficiency issue that is forecast in the central area of the city from 2019, schemes affecting five English medium schools are proposed. Three of these secondary schools are also

catergorised as being in “D” Condition, ie. at the limit of planned lifespan. The schemes are as follows:

### **Cantonian High School**

17. It is proposed that Cantonian High School is rebuilt and expanded to provide a new 11-18 high school, with eight forms of entry (8FE). This is a two form of entry expansion, or 60 places per year (+2FE). This will address “D” condition categorisation and address the “D” rated sufficiency issues within the local catchment. It includes an expansion of post 16 by 55 places to 150 places.

### **Fitzalan High School**

18. It is proposed that Fitzalan High School is rebuilt as a new 11-18 high school, with ten forms of entry (10FE). This will address the “D” condition categorisation and “D” categorised sufficiency issues in the local area.

### **Willows High School**

19. It is proposed that Willows High School is rebuilt and expanded to provide a new 11-16 high school, with eight forms of entry (8FE). This is a two form of entry expansion, or 60 places per year (+2FE). This will address “D” condition categorisation and address the “D” rated sufficiency issues within the local catchment.

### **Cathays High School**

20. It is proposed that Cathays High School is rebuilt and expanded to provide a new 11-18 high school, with eight forms of entry (8FE). This is a two form of entry expansion, or 60 places per year (+2FE). This will address “C” condition categorisation and address the “D” rated sufficiency issues within the local catchment.

### **Cardiff High School**

21. It is proposed that Cardiff High School is expanded and remodelled to provide an 11-18 high school, with ten forms of entry (10FE). This is a two form of entry expansion, or 60 places per year (+2FE). It will address a “D” category sufficiency issue and remodelling and refurbishment works will address the “C” condition rating.

### **Special Schools - proposed Band B schemes**

22. Four special schools have been ‘D’ rated for suitability and are in need of replacement:
  - Riverbank School, for children aged 4-11 with severe and complex learning disabilities
  - Woodlands School, for pupils aged 11-19 with severe and complex learning disabilities

- The Court School for children aged 4-11 with emotional health and wellbeing needs also commonly referred to as 'behavior emotional and social needs.
  - Greenhill School for pupils aged 11-16 with emotional health and wellbeing needs.
23. However, the sufficiency issues in relation to additional learning needs (ALN) are not limited to the areas of need currently served by these four schools. Cardiff is anticipating a significant increase in the need for special school places for children and young people with:
- profound and multiple learning disabilities
  - autism spectrum conditions
  - severe and complex learning disabilities
  - emotional health and wellbeing needs
24. Sufficiency issues are also not limited to the populations currently served by the special schools. Cardiff lacks:
- suitable provision for secondary aged girls with emotional health and wellbeing needs
  - suitable provision for post-16 pupils with emotional health and wellbeing needs, who are not yet ready for transition to college or employment
25. The Council recognises that special schools are more than providers of education: at their best, they provide a locus for multi-agency assessment, planning and support. The multidisciplinary potential of special schools is of increasing importance in light of the Social Services and Wellbeing Act (date) and the Additional Learning Needs and Education and Tribunal Bill, both of which set out statutory responsibilities for agencies to follow a person-centred approach, with the child and their family at the heart of the process, and to implement a single unified plan to promote positive outcomes in relation to health, social care and education.
26. Special schools also play an important role in providing support, information and training for families and for mainstream schools.
27. Band B special sector schemes will therefore be required to deliver on several interconnected goals:
- to replace the 'D' rated accommodation at the four schools named in paragraph 22;
  - to increase capacity across the four areas of need identified in paragraph 23;
  - to address the gaps in provision identified in paragraph 24;
  - to enhance opportunities for multi-agency support and provision;
  - to enhance the role of special schools as a source of support for families and for mainstream schools.

28. The four capital schemes described below will provide a number of different options for re-shaping special school provision in Cardiff in line with these goals. They should not be regarded as 'rebuild and replace' projects, affecting only the four named schools, but as opportunities to review the pattern of provision across the seven special schools in Cardiff.
29. The Council will therefore work with our stakeholders including schools, health, and social services, to shape and appraise the options for reshaping special school provision in Cardiff.

**Primary special school: complex learning disabilities and autism spectrum conditions**

30. It is proposed to build a new 140 place primary special school, for children with severe and complex learning disabilities and children with autism spectrum conditions.
31. This project will enable the council to address the unsuitable accommodation currently used by Riverbank School, and to address sufficiency issues in relation to severe and complex leaning needs and autism spectrum conditions at primary phase.
32. In shaping options for this project, the implications for the respective roles and remit of Ty Gwyn, Riverbank and The Hollies Schools, and for health services that work with the schools, will need to be considered.

**Secondary special school: complex learning disabilities and autism spectrum conditions**

33. It is proposed to build a new 240 place secondary special school for pupils with severe and complex learning disabilities and pupils with autism spectrum conditions.
34. This project will enable the council to address the unsuitable accommodation currently used by Woodlands School, and to address sufficiency issues in relation to severe and complex leaning needs and autism spectrum conditions at secondary phase.
35. In shaping options for this project, the implications for the respective roles and remit of Ty Gwyn, Woodlands, the Marion Centre and for health services that work with the schools, will need to be considered.

**Primary special schools: emotional health and wellbeing needs**

36. It is proposed to build a new primary special school, for children with emotional health and wellbeing needs.
37. This project will enable the council to address the unsuitable accommodation currently used by The Court School, and to address sufficiency issues in relation to emotional health and wellbeing needs at primary phase.

38. The planned place number for this project is 48, but it is yet to be determined whether all of these places should be on a single discrete, special school site, or whether some classes should be based on mainstream school sites, operating as special school 'outreach classes', to enhance the opportunities for children with emotional health and wellbeing needs to maintain links with mainstream education, and to make a successful reintegration if appropriate.

### **Secondary special school: emotional health and wellbeing needs**

39. It is proposed to build a new secondary special school, for pupils with emotional health and wellbeing needs. This project will enable the council to address the unsuitable accommodation currently used by Greenhill School, and to address sufficiency issues in relation to emotional health and wellbeing needs at secondary phase.
40. The planned place number for this project is 112, but these places will be provided on 2 separate sites to ensure the number of vulnerable young people educated on one site does not exceed 56. The project will address the need for designated provision for girls, and for young people post-16 who are not yet ready to transfer to college or employment.
41. The Council will continue to develop collaboration between education and social services, and with Cardiff and the Vale University Health Board, to develop a more holistic approach to therapeutic support for vulnerable learners and their families.

### **Primary Schools - proposed Band B schemes**

42. Four primary schemes that have been prioritised for investment within Band B. These include two English medium and two Welsh medium schools. This will address localised sufficiency issues that will present within the catchment areas within the timescale of the Band B investment. These four primary schools are:

#### **St Mary the Virgin Primary School**

43. It is proposed that St Mary the Virgin Primary School is replaced with a new school and its capacity increased by 30 places per year to a two form of entry school (2FE). This will address projected English-medium sufficiency issues in Grangetown/Butetown area, along with addressing additional pupil yield generated from a number of new housing developments that have gained approval. This scheme was deferred from the Band A Investment programme.

#### **Fairwater Primary School**

44. It is proposed that Fairwater Primary School is enlarged and its capacity increased by 30 places per year to establish a two form of entry school (2FE). This will address projected English-medium sufficiency issues in its catchment area, along with addressing additional pupil yield

generated from a number of new housing developments that have gained approval.

### **Ysgol Pen y Pil**

45. It is proposed that Ysgol Pen y Pil is enlarged and its capacity increased by 30 places per year to a two form of entry school (2FE). This will address projected shortfall in Welsh-medium primary school places in the east of Cardiff.

### **Ysgol Gymraeg Nant Caerau**

46. It is proposed that Ysgol Gymraeg Nant Caerau is enlarged and its capacity increased by 30 places per year to a two form of entry school (2FE). This will address projected shortfall in Welsh-medium primary school places in the south west of Cardiff.

### **Maximising investment for community benefit**

47. Educational assets are a vital investment into the heart of a community. Significant investment in school should actively contribute a wide variety of benefits to the local area.
48. To date, the Council has ensured that all its new facilities are accessible to the local community. New facilities are designed in such a way to allow extended use of all the facilities, whether internal such as main hall, dance or recording studios or external facilities such as MUGA's and 3G sports pitches.
49. The Council seeks to maximise community benefits wherever possible, including benefits for children and young people, through its procurement practices. The Council has explicitly identified this as one aspect of its programme to promote children's rights, as a participating member of the UNICEF Child Rights Partner Programme. This commitment will be reflected in any tender documentation, on a project-by-project basis.
50. In line with Welsh Government guidelines on Community Benefits, the Council will strive to meet the benchmark targets through the delivery of Band B 21st Century Schools programme. These will build stronger communities and in turn develop the local economy to reduce social exclusion and poverty in deprived areas.
51. Delivery of Community Benefits is overseen by a Community Benefits Board, which was established in January 2017. The role of the Board is to co-ordinate the social value agenda across Cardiff Council and maximise the community benefits delivered. The Board includes senior managers from across the Council and meets on a quarterly basis.

### **Indicative Cost of Programme and Funding Options**

52. The indicative cost of the Council's outline Band B programme is £284 million, based on standardised construction cost rates as provided by

Welsh Government. This total cost represents the full “rolled-up” cost of all schemes within the preferred programme. External cost consultants have confirmed that delivering the programme should be possible within the overall envelope identified. As schemes progress, it is felt that it will be possible to identify further efficiencies and various cost-saving measures to ensure that the overall cost envelope is not exceeded.

53. The Welsh Government’s funding model requires the Council to match fund 50% of the total capital cost, with the Welsh Government contributing the other 50% in the form of capital grant. Therefore, the Council will be required to identify capital funding totalling £142 million. In line with the approach taken to Band A, this funding will predominantly take the form of external prudential borrowing and any available capital receipts. External borrowing will give rise to revenue expenditure in the form of capital financing costs and, therefore, the Council will be required to identify revenue funding sources to meet those costs.
54. In addition to the traditional funding model that Band A was predicated on, the Welsh Government made an additional option available to local authorities as part of Band B, known as the Mutual Investment Model (MIM). MIM is a revenue funded option and is based on a 75:25 cost sharing arrangement in the favour of local authorities. The basic premise of the model is that any new schools created would be funded through the private sector through Special Purpose Vehicles, in which Welsh Government would be represented, and local authorities would lease the assets created over a period of 25 years. As such, local authorities would pay an annual lease payment for use of the new school facilities, rather than incurring the up front capital costs associated with constructing and then owning the facilities. The Welsh Government’s proposal would be to provide revenue funding towards 75% of the annual lease payments for the 25 year period. At the end of the 25-year period, the assets would transfer over to the respective local authorities.
55. The Council reviewed the options available, particularly the MIM option, using example information provided by Welsh Government. In doing so, the Council decided to express an interest in the traditional capital funding model only, when submitting its Strategic Outline Business Case. This followed consideration of the overall cost of MIM, the Welsh Government’s proposed contribution rate and the overall level of risk exposure. As such, the intention is that the £284 million programme, if fully approved, will be funded on the traditional capital grant model basis. The final confirmation of funding anticipated from Welsh Government is expected to be on the basis of the traditional model.

### **Local Member Consultation**

56. Any proposals to increase the size of an educational establishment, change its configuration or its location would require statutory consultation. Such consultation would include local members, and would follow publication of detailed proposals and proposed locations.

## **Reason for Recommendations**

57. To approve the schemes that have been prioritised for investment under the Band B phase of the 21<sup>st</sup> Century School programme/

## **Financial Implications**

58. The recommendations to this report do not themselves commit the Council to any capital expenditure commitments and, therefore, there are no capital financial implications directly arising from this report. However, the report outlines a potential capital programme totalling £284 million, the financial implications of which will be significant. External borrowing totalling a maximum of £142 million would result in significant annual revenue capital financing costs and funding sources would need to be identified in order to meet the expenditure commitments resulting. The significance of these commitments necessitate the need for consideration as part of the wider Council budget process and, therefore, the preferred funding solution will form part of the annual budget report presented to Cabinet and Council in February 2018.
59. In addition to the capital, and consequent revenue, funding implications arising from the Band B programme, revenue expenditure in relation to programme management, school transition and business case development will also arise. These costs will also form part of the funding considerations made as part of the Council's annual budget process. However, Recommendation 2 to this report, which highlights the need to progress initial business case development, may result in the need to incur revenue costs in the form of external advice prior to February 2018. It is anticipated that it will be possible to fund these costs from within the current SOP Revenue Reserve, set aside for revenue costs arising from the current 21<sup>st</sup> Century Schools Band A programme and other school organisation projects.

## **Legal Implications**

60. Under the Education Act 1996, the Council has a general statutory obligation to promote high standards of education and to consider parental preference which includes preference for Welsh medium education. The Council also has obligations under the School Standards and Framework Act 1998 and School Funding Regulations 2010 to provide capital funding for maintained schools.
61. Section 84 and 85 of the School Standards and Organisation (Wales) Act 2013 and the Welsh in Education Strategic Plans and Assessing Demand for Welsh Medium Education (Wales) Regulations 2013, set out the statutory obligations for all local authorities to prepare, submit, publish and revise Welsh in Education Strategic Plans (WESPs).
62. The Council also has to satisfy its public sector duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of

opportunity and (3) foster good relations on the basis of protected characteristics. The Protected characteristics are:

- Age
- Gender reassignment
- Sex
- Race – including ethnic or national origin, colour or nationality
- Disability
- Pregnancy and maternity
- Marriage and civil partnership
- Sexual orientation
- Religion or belief – including lack of belief

63. The Council also has to consider its obligation under section 88 and schedule 10 of the Equality Act 2010 to prepare and implement an accessibility strategy. The strategy should increase disabled pupils' access to the curriculum and improve the physical environment and the provision of information.
64. The report identifies that the Equality Impact Assessment has been completed. The purpose of the Equality Impact Assessment is to ensure that the Council has understood the potential impacts of the proposal in terms of equality so that it can ensure that it is making proportionate and rational decisions having due regard to its public sector equality duty. The Council has to be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards when making any policy decisions and consider the impact upon the Welsh language, the report and Equality Impact Assessment deals with all these obligations.

### **HR Implications**

65. HR People Services will work with the Governing Body of all schools within Band B on any HR matters arising from the expansion of individual schools. In line with the SOP HR Framework, the Headteacher and the Governing Body of the schools concerned will be encouraged in to undertake a review of their staffing structure and assess the workforce requirements required for the increase in pupil numbers. This will have to be balanced against the forecasted school budget. However, it is likely that the permanent expansion schools within Band B will result in the creation of new posts in each of the schools concerned.
66. HR People Services will also provide support for the additional recruitment. This will take into account the School Redeployment and Redundancy Policy and Procedure whereby new posts may provide opportunities for any school based staff on the school redeployment register at that particular time.

### **Equality Impact Assessment**

67. An Equality Impact Assessment for the 21<sup>st</sup> Century Schools Band B Programme has been carried out. The assessment concluded that the programme would not adversely affect a particular group in society. Any proposals brought forward following this report would be subject to

further equality impact assessments including an assessment on any changes to accommodation. (Details of the Equality Impact Assessment can be seen at Appendix 1).

### **Sustainability Assessment**

68. A Strategic Environmental Assessment (SEA) of the proposal has been carried out in accordance with European Legislation. The assessment confirms that the proposal is compatible with the Council's 'What Matters' strategy which seeks to deliver 7 strategic outcomes. Any proposals brought forward following this report would be subject to an environmental assessment which would be carried out as part of the planning application process. (Details of the Sustainability Assessment can be seen at Appendix 2).

### **Transport Matters**

69. High level transportation issues have been reviewed for the sites in question to ensure that consideration is given to the ability of the potential locations to support Active Travel, in terms of pedestrian and cycle access to the sites.
70. All new developments will require a Transport Assessment to be undertaken, this will determine whether any changes are deemed necessary to the immediate highway network to enable pupils and staff to access the schools using Active Travel modes. All schools within Cardiff are also encouraged to develop robust Travel Plans which will help them address issues relating to how their staff and pupils travel to school, with the emphasis on encouraging and promoting Active Travel such as walking and cycling.
71. Any highway improvement works identified from the Transport Assessments will have to be funded and delivered as part of the 21<sup>st</sup> Century Schools Programme.

### **Community Impact**

72. The Welsh Assembly Government School Organisation Code 2013 requires local authorities to conduct a Community Impact Assessment and a Welsh Language Impact Assessment when proposing changes to school organisation.
73. The following are taken into account when developing proposals
- Public Open Place/parkland
  - Noise and traffic congestion
  - School designation
  - School links to the local community
  - Impact on parents and families
  - Travelling implications for pupils/families
  - Impact on community activities, impact on community facilities

74. Any proposals brought forward following this report which would be subject to public consultation would include a full assessment of any community impact.

**RECOMMENDATIONS:**

The Cabinet is recommended to:

1. Approve the prioritised schemes under Band B of the 21<sup>st</sup> Century Schools Programme.
2. note the approval in principle of Cardiff Council's Band B Strategic Outline Case by Welsh Government and to authorise the Director of Education and Lifelong Learning to secure Welsh Government approval in principle for the schemes within the programme.
3. note that a subsequent report to Cabinet will propose arrangements to secure sufficient capacity and appropriate governance in order to deliver the Cardiff Band B 21<sup>st</sup> Century Schools Programme.

**NICK BATCHELAR**

Director of Education & Lifelong Learning

8 December 2017

*The following Appendices are attached*

Appendix 1 - Equality Impact Assessment

Appendix 2 - Sustainability Assessment

This page is intentionally left blank

### **Projected availability of and demand for primary and secondary school places**

#### **Projection and forecasting methodology**

Cardiff employs a robust projection methodology for planning school places which takes account of NHS GP registration data and school census data submitted by and verified by all Cardiff schools. As projections can only take account of historic and current information the Council also identifies trends within projections, and analyses school preference data and other contextual information to produce forecasts on a city wide basis and in each locality.

Data analysis allows projections to be prepared based on localised patterns at primary school catchment area level, by secondary school catchment and on a city-wide basis. Each of these provide differing contextual information to inform the forecasting on the number of places that may be needed to meet the requirements of each area and of Cardiff as a whole.

The geographical units that are most suitable to analyse the recent and future demand for primary school places in each area are primary school catchment areas. A wider range of geographical information including aggregated primary school catchment areas, secondary school catchment areas, city-wide information and outflow to other admissions authorities informs planning for meeting the demand for secondary school places.

School catchment areas in Cardiff are not coterminous with ward boundaries and often serve all or part of several ward areas.

The geographical unit that is most suitable to analyse the demand for English-medium secondary school places serving Adamsdown and Splott is the Willows High School catchment area.

Separate to forecasts for existing housing in Cardiff, projections are prepared for new housing planned on large scale housing developments, including the strategic Greenfield and Brownfield housing sites identified in the Local Development Plan. These projections take account of census and housing information in Cardiff and allow a calculation of average numbers of pupils in each type of property.

The Education Supplementary Planning Guidance adopted in 2017 sets out the following average yields in each type of property, taking account of the most recent census data.

Year group	Yields from Flats / Apartments					Yields from Houses / Bungalows				
	1 bed	2 bed	3 bed	4 bed	5+ bed	1 bed	2 bed	3 bed	4 bed	5+ bed
Nursery	0.0102	0.0390	0.0567	0.0470	0.0102	0.0210	0.0507	0.0579	0.0610	0.0555
Primary	0.0155	0.0749	0.1793	0.2329	0.0649	0.0501	0.1247	0.2290	0.2947	0.3059
Secondary	0.0058	0.0287	0.1125	0.1179	0.0373	0.0336	0.0604	0.1666	0.2553	0.2806
6th Form	0.0007	0.0079	0.0345	0.0280	0.0116	0.0092	0.0165	0.0513	0.0864	0.1049

Projection data based on average yields cannot, however, be used to accurately forecast the impact of new housing on the demand for places in each year group.

As a significant proportion of families moving to new housing developments are moving within their local area, the increase in the number of school places required locally and city-wide may be less than would be the case if families have moved into Cardiff. Families moving a short distance to a new development may not wish to transfer their child(ren) to a new school. Consequently, families moving into established housing may therefore have greater difficulty in accessing a local place in an established school.

The rate at which housing on planned new developments is built and occupied depends on a number of market-related factors.

## Capacity of existing secondary schools

Table 2 sets out the number of places available in each secondary school in Cardiff in, and the most recent Number on roll data in January 2020 for the entry year (Year 7).

<b>School Name</b>	<b>Type of School</b>	<b>Age Range</b>	<b>Total Capacity (including sixth form)</b>	<b>Capacity - Years 7 -11</b>	<b>Published Admission Number (2020/21)</b>	<b>Number On Roll – Year 7 (January 2020)</b>
Cantonian High School	Community - English-medium	11-18	1,046	905	181	153
Cardiff High School	Community - English-medium	11-18	1,635	1,200	240	240
Cardiff West Community High School	Community - English-medium	11-18	1,520	1,200	240	211
Cathays High School	Community - English-medium	11-18	1,072	825	165	175
Corpus Christi Catholic High School	Voluntary Aided - faith	11-16	1,075	930	215	214
Eastern High	Community - English-medium	11-16	1,200	1,200	240	240
Fitzalan High School	Community - English-medium	11-18	1,725	1500	300	298
Llanishen High School	Community - English-medium	11-18	1,800	1500	300	303
Mary Immaculate High School	Voluntary Aided - faith	11-16	795	795	159	161
Radyr Comprehensive School	Community - English-medium	11-18	1,365	1,050	210	207
St Illtyd's Catholic High School	Voluntary Aided - faith	11-16	879	879	176	205
St Teilo's C.W High School	Voluntary Aided - faith	11-18	1,440	1,200	240	249
The Bishop Of Llandaff C.W High School	Voluntary Aided - faith	11-18	1,085	900	180	189
Whitchurch High School	Foundation – English-medium	11-18	2,400	1,950	390	400
Willows High School	Community - English-medium	11-18	1,121	1,120	224	154
Ysgol Gyfun Gymraeg Bro Eder	Community- Welsh-medium	11-18	1,114	900	180	182
Ysgol Gyfun Gymraeg Glantaf	Community- Welsh-medium	11-18	1,500	1,200	240	243
Ysgol Gyfun Gymraeg Plasmawr	Community- Welsh-medium	11-18	1,310	1050	210	182
<b>English-medium community places/ pupils</b>					<b>2,100</b>	<b>1,981</b>
<b>Foundation places/ pupils</b>					<b>390</b>	<b>400</b>
<b>Faith School places/ pupils</b>					<b>970</b>	<b>1018</b>
<b>Welsh-medium community places/ pupils</b>					<b>630</b>	<b>607</b>
<b>Total permanent places</b>					<b>4,090</b>	<b>4,006</b>

## Recent city-wide take up of places of pupils entering secondary education

Tables 3 and 4 (below/ overleaf) set out the most recent verified PLASC (Pupil Level Annual School Census) data as supplied by primary schools in January 2019 and by secondary schools in January 2020. This confirms the number of pupils in each of the English-medium secondary school catchment areas who were enrolled in English-medium, Welsh-medium and faith-based primary and secondary schools in Cardiff.

Comparison of Year 6 and Year 7 census data allows forecasting of the likely proportions of pupils within each catchment area that are likely to promote to English-medium, Welsh-medium and Faith-based secondary schools.

<b>Table 3: Year 6 pupils enrolled in English-medium, Welsh-medium and Faith-based secondary schools in each English-medium secondary school catchment area (data source: PLASC 2019)</b>				
Catchment area	English-medium Community and Foundation school pupils	Welsh-medium Community school pupils	Faith-based school pupils	Total pupils
Cantonian High School	119 53.4%	41 18.4%	63 28.3%	223
Cardiff High School	246 81.2%	32 10.6%	25 8.3%	303
Cardiff West Community High School	297 66.4%	56 12.5%	94 21.0%	447
Cathays High School	88 60.7%	22 15.2%	35 24.1%	145
Eastern High	380 60.4%	81 12.9%	168 26.7%	629
Fitzalan High School	394 60.0%	124 18.9%	139 21.2%	657
Llanishen High School	476 67.1%	72 10.2%	161 22.7%	709
Radyr Comprehensive School	173 75.9%	49 21.5%	6 2.6%	228
Whitchurch High School	333 74.5%	99 22.1%	15 3.4%	447
Willows High School	169 61.2%	25 9.1%	82 29.7%	276
<b>Total Number or pupils</b>	<b>2675</b> <b>65.8%</b>	<b>601</b> <b>14.8%</b>	<b>788</b> <b>19.4%</b>	4064

**Table 4: Year 7 pupils enrolled in English-medium, Welsh-medium and Faith-based secondary schools in each English-medium secondary school catchment area (data source: PLASC 2020)**

Catchment area	English-medium Community and Foundation school pupils	Welsh-medium Community school pupils	Faith-based school pupils	Total pupils	Net increase/loss
Cantonian High School	113 51.6%	39 17.8%	67 30.6%	219	-4
Cardiff High School	254 82.2%	26 8.4%	29 9.4%	309	6
Cardiff West Community High School	268 58.4%	54 11.8%	137 29.8%	459	12
Cathays High School	100 64.5%	23 14.8%	32 20.6%	155	10
Eastern High	274 44.2%	87 14.0%	259 41.8%	620	-9
Fitzalan High School	384 63.7%	119 19.7%	100 16.6%	603	-54
Llanishen High School	348 51.9%	77 11.5%	245 36.6%	670	-39
Radyr Comprehensive School	161 71.9%	45 20.1%	18 8.0%	224	-4
Whitchurch High School	308 69.4%	101 22.7%	35 7.9%	444	-3
Willows High School	157 59.5%	27 10.2%	80 30.3%	264	-12
Combined Published Admission Number	<b>2,505</b>	<b>600</b>	<b>970</b>	<b>4,075</b>	
Total Number or pupils	<b>2367</b> <b>59.7%</b>	<b>598</b> <b>15.1%</b>	<b>1002</b> <b>25.3%</b>	<b>3967</b>	<b>-97</b>
Surplus places	<b>138</b>	<b>2</b>	<b>-32</b>	<b>108</b>	
Difference: Year 6 / 7	<b>-308</b>	<b>-3</b>	<b>214</b>	<b>-97</b>	

Comparing Table 3 and Table 4 it is evident in that:

- The proportionate take up of English-medium places in each secondary school catchment area varies significantly across Cardiff ranging from 44.2% to 82.2% at secondary level and to a lesser extent at primary level were the range is between 53.4% and 81.2%.
- The variation of Welsh-medium take- varies less, at both primary and secondary level, ranging from around 9%-22% across the city.
- Faith-based take-up also varies significantly from area to area: the catchment area of Whitchurch High School has the lowest level at both primary and secondary levels as a percentage of the catchment. The highest at primary level is in the catchment area of Willows High School and at secondary level is in the catchment of Eastern High.
- There is an overall citywide reduction in the number of pupils enrolled in Year 6 in primary education, and the number of pupils enrolled in Year 7 at secondary level the following year. The decrease in cohort survival ratio (CSR) is observed

every year, but there are some areas with a significant reduction. The most evident reduction is in the catchment area for Fitzalan High School with a net loss of 54 pupils largely as a result of pupils taking up places in the Vale of Glamorgan. This catchment area also had the largest reduction, between Year 6 and Year 7 pupils, when reviewing the data from the previous two years.

- There is a marginal increase in percentage terms for the CSR in Welsh-medium education (from 14.8% of the cohort, to 15.1%) whereas the increase in the percentage of pupils opting for Faith-based education between Year 6 and Year 7 (from 19.4% to 25.3%) is significant.
- Faith-based secondary schools, for which the Council is not the admissions authority, admitted 32 Cardiff pupils in excess of their Published Admission Number in 2019/20. A further 16 pupils living outside of Cardiff were also admitted.

The parental preference for and take-up of places in each type of school is dependent on number of variables including, but not limited to, the number of places available in each school type relative to the local population, the admission arrangements for that school, and parental perception.

Within the Willows High School catchment area, there is little change in the number of pupils transferring to English-medium community secondary schools compared to those attending English-medium community primary schools. (61.2% at primary level reducing to 59.5% at secondary level).

### **Forecast city-wide demand for places – existing housing**

Each of the Faith-based and Foundation secondary schools has been fully-subscribed or over-subscribed at entry to Year 7 in recent years. The number of children taking up places in these schools has been consistent, and they have operated at or near full subscription whilst total pupil populations were relatively high or low.

As there are no proposals to permanently increase the number of places available in faith-based secondary schools during the Band B period (2020-2024), the relative proportion of the population able to gain admission to faith-based schools will fall as the overall population increases during this period. Consequently the proportionate take-up of places in English-medium community and Foundation secondary schools would increase, in order to accommodate all pupils requiring a place.

It is expected that faith-based schools would continue to have high levels of take up when city-wide populations are projected to fall, in the later part of the decade, and the take up of places within English-medium community schools would proportionately decrease.

The number<sup>1</sup> of pupils taking up places in Faith-based secondary schools in the years 2017-18, 2018-19 and 2019-20 totalled 1006, 1001 and 1018 respectively. In each of

---

<sup>1</sup> PLASC Citywide data – Projections 2020

these years, the Faith-based secondary schools were fully subscribed (combined Published Admission Number of 970<sup>2</sup>), and there was little fluctuation in the number of pupils allocated places in each area of Cardiff.

By analysing the take up of places in recent years in each part of the city, forecasts can be produced for the numbers and resident catchment areas of pupils who may gain admission to Faith-based secondary schools. In turn, this allows forecasting for the number of pupils who require English-medium community places in those area.

Table 5: forecast take up of places at entry to Year 7 in faith-based secondary schools in each English-medium secondary school catchment areas. (data source: PLASC Jan 2020 – 3 year average)	
Catchment Area	Approximate forecast take up of places at faith school places within area
Cantonian High School	59
Cardiff High School	33
Cardiff West Community High School	148
Cathays High School	33
Eastern High School	255
Fitzalan High School	93
Llanishen High School	237
Radyr Comprehensive School	14
Whitchurch High School	34
Willows High School	80
Total projected demand	986

As set out in Table 4, there is a significant difference between the number of pupils enrolled in Year 6 in primary education and the number of pupils enrolled in Year 7 the following year. There are various reasons for this including attendance at secondary schools outside of Cardiff, private education, or education at home.

Parental preference data also indicates that some of these pupils had stated a preference for Cardiff schools, but having failed to gain admission to their preferred school, opted for alternatives at a later date. It would therefore be reasonable to conclude that, to accommodate the latent demand for English-medium community school places, additional places may be required.

Although the highest oversubscription criteria for admissions to faith-based and foundation secondary schools are not geographical based, the number of pupils admitted from each area in recent years is relatively stable and allows approximate forecasting of the number of pupils who may gain admission in future.

---

<sup>2</sup> School Admissions 20/21

Table 6 therefore sets out the net number of places that may be required to meet the demand for English-medium community and foundation places in each secondary school catchment area of the city (existing housing only), having taken account of the forecast take-up of places at faith-based schools in each area.

Table 6: Forecast net demand for places at any English-medium community secondary school in each English-medium secondary school catchment area (at entry to Year 7), allowing for consistent take-up in faith-based schools								
Catchment Area	Forecasts based on PLASC data - Pupils enrolled in primary education				Forecasts based on NHS data			
	2023	2024	2025	2026	2027	2028	2029	2030
Cantonian High School	98	106	113	85	78	77	71	70
Cardiff High School	285	252	268	282	281	270	236	195
Cardiff West Community High School	221	200	193	219	173	177	171	150
Cathays High School	68	105	87	89	82	69	69	68
Eastern High School	326	269	323	283	313	278	298	274
Fitzalan High School	384	309	328	317	343	265	257	241
Llanishen High School	330	308	302	330	302	281	265	238
Radyr Comprehensive School	180	176	170	191	159	146	139	132
Whitchurch High School	353	313	327	320	347	276	295	267
Willows High School	189	171	150	148	165	142	144	108
Total demand for English-medium and Community/ Foundation places	2429	2266	2308	2323	2299	2094	2058	1918

The above forecasts take account of the most recent take-up of places but do not yet allow for changes of pupil preference patterns expected as a result of planned changes to secondary schools in Cardiff.

### **Forecast demand for places – existing housing in the Cathays High School catchment area**

Tables 5 and 6 indicate that, in the Band B investment period, 68-105 English-medium community secondary school places will be required to serve the existing Cathays High School catchment area, either at the school or at other English-medium community schools. This takes account of c33 places being taken up within Faith-based schools by pupils resident in the area. Intakes peak in 2024 but reduce thereafter.

This suggests that capacity of three forms of entry (90 places per year group) would be sufficient to meet the demand for places within the existing catchment area of Cathays High School beyond the Band B period.

Whilst city-wide pupil populations are relatively stable within the mid part of the decade, pupil numbers decline significantly from 2028 onwards. This pattern is also evident within the Cathays High School catchment area, with forecasted numbers requiring English-medium provision in this area falling to approximately 2.3 forms of entry from 2028 - 2030. This data takes account of the most recent (June 2020) NHS GP registration data for the cohort of children born in the 2018/2019 school year, who are resident in each area of the city.

The numbers of pupils in some year groups, resident within the catchment area of Cathays High School, has fluctuated significantly. In some year groups, cohorts have increased or reduced in number by more than 20 pupils (>20% of the cohort) within three to four years, but the migration patterns are not consistent. This suggests that three forms of entry may not be sufficient to respond to fluctuations in the population.

Intakes to secondary education from 2028 are based on NHS data for pre-school children and reflect the recent parent preferences for English-medium community, Welsh-medium or faith schools as a proportion of the primary school intakes, and could therefore change. A new-build school would be anticipated to have a positive effect on local pupil preferences.

Whilst capacity of three forms of entry is appropriate to meet the demand for places at Cathays High School from within the existing catchment area of the school beyond the Band B period, planned housing in the south of the city will reduce the area served by Fitzalan High School and will increase pupil numbers at neighbouring schools including Cathays High School and Cantonian High School.

### **Forecast demand for places – planned/ proposed housing including strategic LDP sites and strategic reorganisation in other areas**

The future planning of places must take into account the impact of a new-build 21<sup>st</sup> Century school, and Band B proposals for other secondary schools, and how this may affect parental preferences. The distribution of capacity between Cathays High School and neighbouring schools should retain sufficient surplus capacity across the wider area to respond to potential future population changes and parental preference patterns.

There are a number of planned residential developments in close proximity to the Cathays High School catchment area, including those with outline or full planning permission within the Fitzalan High School catchment areas which would significantly increase the pupil population:

- International Sports Village, Grangetown
- Clive Lane Embankment
- West of Dumballs Road, Butetown
- Bessemer Fruit Market, Grangetown
- Gas Works site, Ferry Road, Grangetown
- Porth Teigr (Roath Basin), Butetown

Whilst developer contributions have been secured via s106 agreement to accommodate the secondary school age pupil yield from some of these residential

developments, others are at earlier stages of planning and would be expected to further increase the number of pupils in the area.

Forecasts based on existing housing within the Fitzalan High School catchment area, allowing for a indicate that school capacity of 10- 12 forms of entry would be necessary to meet the demand for places within an English-medium community secondary school in Cardiff. Changes to the catchment area of St Cyres Comprehensive School are expected to increase the demand for places within the Fitzalan High School catchment area by approximately 2 forms of entry, to 12-14 forms of entry, as fewer children from the area would gain admission to St Cyres.

The planned replacement of Fitzalan High School with a new, 21<sup>st</sup> Century School of 10 Forms of Entry would also be expected to have a positive impact on parental preferences within its existing catchment area, further increasing demand for places at the school and in effect reducing the area that the school directly serves.

Planned housing developments within the Fitzalan High School catchment area, including those with outline or full planning permission, would exacerbate this shortfall of places further. This would impact other neighbouring English-medium community schools, including Cathays High School, Willows High School and Cantonian High School, and must be considered when planning provision.

Whitchurch High School, currently 13 FE, is planned to reduce to 12 FE from 2024, reducing surplus in the North of the city. The expansion of Cardiff High School from 8FE to 10FE and consolidation of Willows High School at 6FE are also included in the Band B programme.

Retaining Cathays High School at its existing capacity of 5.5 forms of entry, or a minor expansion to six forms of entry would not be sufficient to meet the demand from within its catchment area and the excess demand from within the neighbouring catchment area of Fitzalan High School.

### **Recent intakes to Cathays High School**

Pupil numbers in Year 7 at Cathays High School have been significantly higher in recent years, reflecting the increased pupil population in neighbouring areas and the school's central and convenient location relative to this population.

Analysis of the last five years of PLASC data (2016-2020) confirms that, on average, approximately 40% of the pupils enrolled at Cathays High School reside within the catchment area of the school, and this percentage had increased as the total number enrolled at the school has grown. The majority of those pupils who live outside of the catchment area come from the neighbouring areas of Fitzalan High School (18%), Willows High School (20%) and Cardiff High School (8%).

A temporary increase to the admission number at Cathays High School, to 240 places, was implemented for the 2020/21 intake and all places were allocated. The central location of the school enabled it to meet the excess demand for places, and to accommodate late applicants, from the south, central and north areas of the city and

retain less than 5% surplus city-wide in the year group. Similar measures, increasing the intake at Cathays High School to 240 places, are likely to be needed in coming years.

It is expected that the school would be fully subscribed at entry to year 7, based on pupil populations in the wider area, until at least 2024, and the school would have eight forms of entry enrolled in some year groups until at least 2028. If Cathays High School was expanded to less than eight forms of entry, additional classrooms and facilities, to accommodate the 'bulge years' intakes, would be required for an extended period of time, for up to five years beyond 2024. This may not be an efficient nor cost effective solution on a constrained site and would severely limit options for providing outdoor sports and social provision for learners.

Within the context of planned changes in provision, an expansion of Cathays High School to eight forms of entry would provide sufficient permanent capacity to meet local demand, to meet the excess demand for places in neighbouring catchment areas and would provide a reasonable level of surplus serving the wider area to respond to fluctuations in the populations in future years.

### **Summary – Secondary demand**

In summary, expanding Cathays High School to 8FE (240 places) from September 2023 would meet the projected demand for places from within the existing catchment area of the school and would provide sufficient surplus capacity to meet part of the excess demand for places within neighbouring catchment areas. This proposed capacity takes account of the existing proportions of pupils that

- (i) Take up places in English-medium community secondary schools
- (ii) Take up places in English-medium faith-based secondary schools
- (iii) Take up places in Welsh-medium community secondary schools

and allows for similar preference patterns in future.

In summary, an expansion of the school to 8FE would:

- Create an efficient class organisation.
- Provide sufficient capacity to allow the projected number of children within the Cathays High School catchment area, requiring a place in an English-medium community high school, to attend.
- Provide surplus capacity to enable the excess demand from neighbouring catchment areas to be accommodated
- Ensure that citywide capacity and surplus places would be appropriately balanced, in the context of projected reductions in secondary school pupil numbers at the end of the decade and potential uplift in the birth cycle in future years.

This page is intentionally left blank

## Appendix 3

### Cardiff Council Statutory Screening Tool Guidance

If you are developing a strategy, policy or activity that is likely to impact people, communities or land use in any way then there are a number of statutory requirements that apply. Failure to comply with these requirements, or demonstrate due regard, can expose the Council to legal challenge or other forms of reproach.

For instance, this will apply to strategies (i.e. Housing Strategy or Disabled Play Strategy), policies (i.e. Procurement Policy) or activity (i.e. developing new play area).

Completing the Statutory Screening Tool will ensure that all Cardiff Council strategies, policies and activities comply with relevant statutory obligations and responsibilities. Where a more detailed consideration of an issue is required, the Screening Tool will identify if there is a need for a full impact assessment, as relevant.

The main statutory requirements that strategies, policies or activities must reflect include:

- **Equality Act 2010 - Equality Impact Assessment**
- **Welsh Government's Sustainable Development Bill**
- **Welsh Government's Statutory Guidance - Shared Purpose Shared Delivery**
- **United Nations Convention on the Rights of the Child**
- **United Nations Principles for Older Persons**
- **Welsh Language Measure 2011**
- **Health Impact Assessment**
- **Habitats Regulations Assessment**
- **Strategic Environmental Assessment**

This Statutory Screening Tool allows us to meet all the requirements of all these pieces of legislation as part of an integrated screening method that usually taken no longer than an hour.

---

The Screening Tool can be completed as a self assessment or as part of a facilitated session, should further support be needed. For further information or if you require a facilitated session please contact the Policy, Partnerships and Citizen Focus Team on 2078 8563 e-mail: [siadavies@cardiff.gov.uk](mailto:siadavies@cardiff.gov.uk). Please note:

- **The completed Screening Tool must be submitted as an appendix with the Cabinet report.**
- **The completed screening tool will be published on the intranet.**

## Statutory Screening Tool

<b>Name of Strategy / Policy / Activity:</b>	<b>Date of Screening:</b>
<b>SCHOOL ORGANISATION PLANNING: Cathays High School</b>	<b>November 2020</b>
<b>Service Area/Section:</b> Education & Lifelong Learning/ School Organisation Planning	<b>Lead Officer: Richard Portas</b>
<b>Attendees:</b> Self assessment	

<b>What are the objectives of the Policy/Strategy/Project/Procedure/ Service/Function</b>	<b>Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]</b>
<p><b>Proposal:</b></p> <p>It is proposed to:</p> <p>Expand Cathays High School from 1,072 places (5.5 Forms of Entry with 247 sixth form places) to 1,450 places (8 Forms of Entry with 250 sixth form places), from September 2023;</p> <p>Replace the Cathays High School buildings with new build accommodation on the Maindy Centre site adjacent to Crown Way and North Road;</p> <ul style="list-style-type: none"> <li>Expand the current Specialist Resource Base (SRB) for learners with Autism Spectrum Condition from 16 to 50 places in purpose-built accommodation in the new school buildings;</li> <li>Upgrade community facilities in Cathays and Gabalfa through the significantly enhanced school facilities being made available for shared use with the wider local community.</li> </ul>	<p>At its meeting on 14 December 2017, the Cabinet approved the prioritised scheme under Band B of the Cardiff's Band B 21st Century Schools Programme.</p> <p>The Band B Programme seeks to address the most acute sufficiency and condition issues in Cardiff.</p> <p>Following a period of growth within the primary sector, there has been an increased demand for places at entry to secondary education city wide in the past five years. City-wide projections indicate that the demand for places in the English-medium secondary sector will further increase during the period of the Band B investment programme.</p> <p>The areas that are presenting as having the most acute shortage of places requiring a strategic solution, taking account of neighbouring catchment capacity, are those concentrated in the central area of the city. These are primarily focused in the central part of the authority, currently served by Fitzalan High School, Cantonian High School, Willows High School, Cathays High School and Cardiff High School.</p>

Cathays High School is rated as a “C” category for condition, which means the buildings are poor condition with major defects. A significant percentage of its accommodation is housed in demountable accommodation.

A Specialist Resource Base for pupils with Autism Spectrum Condition (ASC) is located at Cathays High School and supports up to 16 pupils aged 11-18.

Although the Council increased ASC places between 2012 and 2017, from 82 to 140, it is anticipated that demand for ASC SRB places will continue to grow over the next 5-10 years. Due to increased demand, and the shortage of specialist ASC places in Cardiff, separate proposals have been brought forward to expand another existing ASC base at Cantonian High School.

It is proposed to retain the SRB at Cathays High school, as part of the future school, to ensure continued provision for current and future pupils. The current expertise and inclusive practice of the school would be maintained. Additional places would help to ensure there are sufficient places to meet increased demand arising out of a growing pupil population and a growing incidence and identification of ASC in Cardiff.

The proposed expansion of Cathays High School in new build, 21<sup>st</sup> Century accommodation presents an opportunity to further develop the specialist provision within the school and to increase the number of places available from 16 to 50.

## Part 1: Impact on outcomes and due regard to Sustainable Development

Please use the following scale when considering what contribution the activity makes:		
<b>+</b>	Positive	Positive contribution to the outcome
<b>-</b>	Negative	Negative contribution to the outcome
<b>ntrl</b>	Neutral	Neutral contribution to the outcome
<b>Uncertain</b>	Not Sure	Uncertain if any contribution is made to the outcome

	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
Page 246	<b>1.1 People in Cardiff are healthy;</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li><i>the promotion of good health, prevention of damaging behaviour, promote healthy eating/active lifestyles etc,</i></li> <li><i>vulnerable citizens and areas of multiple deprivation</i></li> <li><i>Addressing instances of inequality in health</i></li> </ul>	x				- See 1.2 below – encouraging walking, cycling and use of public transport
	<b>1.2 People in Cardiff have a clean, attractive and sustainable environment;</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li><i>the causes and consequences of Climate Change and creating a carbon lite city</i></li> </ul>	x				- This proposal will provide cost effective sustainable buildings that will reduce ongoing revenue costs in turn reducing the Council's carbon footprint in line Cardiff's Carbon Reduction Strategy (May 2015).
	<ul style="list-style-type: none"> <li><i>encouraging walking, cycling, and use of public transport and improving access to countryside and open space</i></li> </ul>	x				<ul style="list-style-type: none"> <li>- In line with the Well-being of Future Generations Act, Cardiff Council is committed to providing Local Schools for Local Children, to encourage use of sustainable modes to travel to schools, such as walking and cycling. School projects take into account transport issues when they are being designed and the need to provide safer routes to encourage walking to schools</li> <li>- Promotion of initiatives such as Kerbcraft training, training in cycling skills and the Local Authority's implementation of Active Travel measures</li> </ul>
	<ul style="list-style-type: none"> <li><i>reducing environmental pollution (land, air, noise and water)</i></li> </ul>	x				- Implementation of an effective travel plan would minimise the need for non-sustainable transport to and from schools
	<ul style="list-style-type: none"> <li><i>reducing consumption and encouraging waste reduction,</i></li> </ul>	x				- Proposals are progressed in line with Welsh Government

	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
	<i>reuse, recycling and recovery</i>					Community Benefit Measurement Tool which encourages reduced consumption, waste reduction and recycling.
	<ul style="list-style-type: none"> <li><i>encouraging biodiversity</i></li> </ul>			x		- Site surveys will be undertaken to establish levels of biodiversity and will explore opportunities to develop appropriate initiatives.
<b>1.3</b>	<b>People in Cardiff are safe and feel safe;</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li><i>reducing crime, fear of crime and increasing safety of individuals</i></li> <li><i>addressing anti-social behaviour</i></li> <li><i>protecting vulnerable adults and children in Cardiff from harm or abuse</i></li> </ul>	x				- All schools in Cardiff have policies in place to ensure safeguarding and the wellbeing of staff, children and young people.
<b>1.4</b>	<b>Cardiff has a thriving and prosperous economy;</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li><i>economic competitiveness (enterprise activity, social enterprises, average earnings, improve productivity)</i></li> <li><i>Assisting those Not in Education, Employment or Training</i></li> <li><i>attracting and retaining workers (new employment and training opportunities, increase the value of employment,)</i></li> <li><i>promoting local procurement opportunities or enhancing the capacity of local companies to compete</i></li> </ul>	x				- The school provides employment and the new Teacher Training facility will provide an opportunity for up to 30 students per academic year.
<b>1.5</b>	<b>People in Cardiff achieve their full potential;</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li><i>promoting and improving access to life-long learning in Cardiff</i></li> <li><i>raising levels of skills and qualifications</i></li> <li><i>giving children the best start</i></li> <li><i>improving the understanding of sustainability</i></li> <li><i>addressing child poverty (financial poverty, access poverty, participation poverty)</i></li> <li><i>the United Nations Convention on the Rights of a Child and Principles for Older persons</i></li> </ul>	x				<ul style="list-style-type: none"> <li>- The Council's proposals for Band B of the 21st Century Schools Programme, and the Cardiff 2020 strategy, clearly state the link between improving the environment for learning and raising standards of achievement.</li> <li>- With significant sports and wider leisure provision now established, or being developed, in many schools a key objective is to enable third party to access the sports facilities at schools, on a sustainable financial basis. The development of a viable model for all schools across the city to be accessed by the communities which they serve is needed.</li> <li>- Cardiff's Child Friendly City strategy places the rights and voices of children and young people at the heart of Cardiff's policies, strategies and services; involving them in decision</li> </ul>

	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
						<p>making and addressing the barriers which limit their life chances. As such the public consultation on the proposal will include representation from children and young people.</p> <ul style="list-style-type: none"> <li>- Subject to approval any future design work would also include representation from children and young people.</li> </ul>
Page 248	<b>1.6 Cardiff is a Great Place to Live, Work and Play</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li>• <i>promoting the cultural diversity of Cardiff</i></li> <li>• <i>encouraging participation and access for all to physical activity, leisure &amp; culture</i></li> <li>• <i>play opportunities for Children and Young People</i></li> <li>• <i>protecting and enhancing the landscape and historic heritage of Cardiff</i></li> <li>• <i>promoting the City's international links</i></li> </ul>	x		x		<ul style="list-style-type: none"> <li>- With significant sports and wider leisure provision now established, or being developed, in many schools a key objective is to enable third party to access the sports facilities at schools, on a sustainable financial basis. The development of a viable model for all schools across the city to be accessed by the communities which they serve is needed.</li> </ul>
	<b>1.7 Cardiff is a fair, just and inclusive society.</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li>• <i>the elimination of discrimination, harassment or victimisation for equality groups</i></li> </ul>	x		x		<ul style="list-style-type: none"> <li>- See Equality Impact Assessment below and attached.</li> <li>- The Council's recruitment process would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.</li> </ul>
	<ul style="list-style-type: none"> <li>• <i>has the community or stakeholders been engaged in developing the strategy/policy/activity?</i></li> <li>• <i>how will citizen participation be encouraged (encouraging actions that consider different forms of consultation, through more in depth engagement to full participation in service development and delivery)?</i></li> </ul>	X				<ul style="list-style-type: none"> <li>- Subject to authorisation the public consultation will include engagement with all relevant stakeholders.</li> </ul>

	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
	<b>EQUALITY IMPACT ASSESSMENT (This is attached on page 13)</b> Will this Policy/Strategy/Project have a <b>differential impact</b> on any of the following:					
<b>1.8</b>	<b>The Council delivers positive outcomes for the city and its citizens through strong partnerships</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li><i>strengthening partnerships with business and voluntary sectors</i></li> <li><i>the collaboration agenda and the potential for shared services, cross-boundary working and efficiency savings</i></li> </ul>	x				<p>The 'Cardiff Commitment' is the Council's youth engagement and progression strategy. The Cardiff Commitment sets out how the council, together with a wide range of public, private and third sector partners, will work together to ensure a positive destination for every young person in Cardiff after they finish school, either in employment or further education and training.</p> <p>To date over 120 businesses have pledged to support Cardiff Commitment and provide opportunities to schools and young people, better preparing them for the world of work, contributing to the future economic growth of the city.</p> <p>The Council's Cardiff 2030 strategy clearly states the link between improving the environment for learning and raising standards of achievement and fostering different modes of acquiring knowledge and skills.</p>

**SUMMARY OF APPRAISAL (highlight positive and negative effects of the policy / plan / project being assessed, demonstrating how it contributes to the economic, social and environmental sustainability of the city):**

**Economic**

Investment in new build facilities that would support the delivery of a broad and balanced curriculum.  
 The new accommodation and expansion of provision would provide employment opportunities.  
 Consideration would be given to using local contractors and suppliers.

**Social**

There could be the potential for community use of school facilities outside of school hours.

**Environmental sustainability**

This proposal would result in the pupils attending a new build, fit for purpose 21st Century schools. The schools would be designed to be in compliance with the BREEAM Excellent specification, minimising running costs and detrimental environmental impact.

**WHAT ACTIONS HAVE BEEN IDENTIFIED OR CHANGES BEEN MADE TO THE POLICY / PLAN / PROJECT AS A RESULT OF THIS APPRAISAL:**

If the proposal were to proceed, an equality impact assessment would be carried out to identify accessibility to the new build school.

The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design 2014 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.

## Part 2: Strategic Environmental Assessment Screening

		Yes	No
2.1	Does the plan or programme set the framework for future development consent?	x	
2.2	Is the plan or programme likely to have significant, positive or negative, environmental effects?		x

Is a Full Strategic Environmental Assessment Screening Needed?	Yes	No
<ul style="list-style-type: none"> <li>▪ If yes has been ticked to both questions 2.1 and 2.2 then the answer is yes</li> <li>▪ If a full SEA Screening is required then please contact the Sustainable Development Unit to arrange (details below)</li> </ul>		X An SEA has been undertaken (attached)

Page 25

If you have any doubt on your answers to the above questions regarding SEA then please consult with the Sustainable Development Unit on 2087 3228 or [sustainabledevelopment@cardiff.gov.uk](mailto:sustainabledevelopment@cardiff.gov.uk)

## Part 3: Habitat Regulation Assessment (HRA)

		Yes	No	Unsure
3.1	Will the plan, project or programme results in an activity which is known to affect a European site, such as the Severn Estuary or the Cardiff Beech Woods?		x	
3.2	Will the plan, project or programme which steers development towards an area that includes a European site, such as the Severn Estuary or the Cardiff Beech Woods or may indirectly affect a European site?		x	
3.3	Is a full HRA needed?		x	

Details of the strategy will be sent to the County Ecologist on completion of the process to determine if a Habitat Regulation Assessment is needed. For further information please phone 2087 3215 or email [biodiversity@cardiff.gov.uk](mailto:biodiversity@cardiff.gov.uk)



## Appendix 1 – Statutory Requirements

It is possible that the Impact Screening Tool will identify the need to undertake specific statutory assessments:

- **Equality Impact Assessment:** *This assessment is required by the Equality Act 2010 and Welsh Government’s Equality Regulations 2011.*
- **Sustainable Development Bill:** *The Bill, when it comes into effect, will require sustainable development (SD) to be a central organising principle for the organisation. This means that there is a duty to consider SD in the strategic decision making processes.*
- **Shared Purpose Shared Delivery-** *The Welsh Government requires local authorities to produce a single integrated plan to meet statutory requirements under a range of legislation. Cardiff Council must therefore demonstrate its contribution towards Cardiff’s own integrated plan; “What Matters”.*
- **United Nations Convention on the Rights of the Child:** *The Children Act 2004 guidance for Wales requires local authorities and their partners to have regard to the United Nations Convention on the Rights of a Child.*
- **United Nations Principles for Older Persons:** *The principles require a consideration of independence, participation, care, self-fulfillment and dignity.*
- **The Welsh Language Measure 2011:** *The measure sets out official status for the Welsh language, a Welsh language Commissioner, and the freedom to speak Welsh.*
- **Health Impact Assessment:** *(HIA) considers policies, programmes or projects for their potential effects on the health of a population*
- **Strategic Environmental Impact Assessment:** *A Strategic Environmental Assessment (SEA) is an European Directive for plans, programmes and policies with land use implications and significant environmental effects.*
- **Habitats Regulations Assessment:** *The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 provides a requirement to undertake Habitats Regulations Assessment (HRA) of land use plans.*



**Policy/Strategy/Project/Procedure/Service/Function Title:**

It is proposed to:

- Expand Cathays High School from 1,072 places (5.5 Forms of Entry with 247 sixth form places) to 1,450 places (8 Forms of Entry with 250 sixth form places), from September 2023;
- Replace the Cathays High School buildings with new build accommodation on the Maindy Centre site adjacent to Crown Way and North Road;
- Expand the current Specialist Resource Base (SRB) for learners with Autism Spectrum Condition from 16 to 50 places in purpose-built accommodation in the new school buildings;
- Upgrade community facilities in Cathays and Gabalfa through the significantly enhanced school facilities being made available for shared use with the wider local community.

**New**

**Who is responsible for developing and implementing the Policy/Strategy/Project/Procedure/Service/Function?**

Name: Richard Portas	Job Title: Programme Director (SOP)
Service Team: School Organisation Planning	Service Area: Education and Lifelong Learning
Assessment Date: November 2020	

1. **What are the objectives of the Policy/Strategy/Project/ Procedure/ Service/Function?**
1. **Please provide background information on the Policy/ Strategy / Project / Procedure / Service / Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]**

Following a period of growth within the primary sector, there has been an increased demand for places at entry to secondary education city wide in the past five years. City-wide projections indicate that the demand for places in the English-medium secondary sector will further increase during the period of the Band B investment programme.

The areas that are presenting as having the most acute shortage of places requiring a strategic solution, taking account of neighbouring catchment capacity, are those concentrated in the central area of the city. These are primarily focused in the central part of the authority, currently served by Fitzalan High School, Cantonian High School, Willows High School, Cathays High School and Cardiff High School.

Cathays High School is rated as a “C” category for condition, which means the buildings are poor condition with major defects. A significant percentage of its accommodation is housed in demountable accommodation.

### **Specialist Resource Base for pupils with Autism Spectrum Condition (ASC)**

A Specialist Resource Base for pupils with Autism Spectrum Condition (ASC) is located at Cathays High School and supports up to 16 pupils aged 11-18.

Although the Council increased ASC places between 2012 and 2017, from 82 to 140, it is anticipated that demand for ASC SRB places will continue to grow over the next 5-10 years. Due to increased demand, and the shortage of specialist ASC places in Cardiff, separate proposals have been brought forward to expand another existing ASC base at Cantonian High School.

**3**

**Assess Impact on the Protected Characteristics**

**Age**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative/]** on younger/older people?

	<b>Yes</b>	<b>No</b>	<b>N/A</b>
3 to 11 years	<b>x</b>		
11 to 18 years	<b>x</b>		
18 - 65 years	<b>x</b>		
Over 65 years	<b>x</b>		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The impact will be positive as the proposals will support the sufficiency of places in high quality learning environments in both mainstream and special provision.

The proposed expansion of Cathays High School in new build, 21<sup>st</sup> Century accommodation presents an opportunity to further develop the specialist provision within the school and to increase the number of places available from 16 to 50. This will have a positive impact.

The transfer of the school would allow the indoor facilities at Maindy centre to

It is proposed to retain the SRB at Cathays High school, as part of the future school, to ensure continued provision for current and future pupils. The current expertise and inclusive practice of the school would be maintained. Additional places would help to ensure there are sufficient places to meet increased demand arising out of a growing pupil population and a growing incidence and identification of ASC in Cardiff.

The proposed expansion of Cathays High School in new build, 21<sup>st</sup> Century accommodation presents an opportunity to further develop the specialist provision within the school and to increase the number of places available from 16 to 50.

continue to be provided and, when completed, external sports facilities used by the school during the school day would be made available for wider community use outside of these hours.

**What action(s) can you take to address the differential impact?**

**If no differential impact, explain the reason(s) for this assessment:**

### 3.2 Disability and Access

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment		x	
Physical Impairment		x	
Visual Impairment		x	
Learning Disability		x	
Long-Standing Illness or Health Condition			x
Mental Health			x
Substance Misuse			x
Other			x

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

**What action(s) can you take to address the differential impact?**

**If no differential impact, explain the reason(s) for this assessment:**

**Accessibility of the accommodation**

If the proposal were to proceed, an equality impact assessment would be carried out to identify the accessibility of the new build school.

The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design 2014 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.

**3.3 Gender Reassignment**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
<b>Transgender People</b> (People who are proposing to undergo, are undergoing, or have undergone a process [or part of a process] to reassign their sex by changing physiological or other attributes of sex)		x	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

**What action(s) can you take to address the differential impact?**

**If no differential impact, explain the reason(s) for this assessment:**

If the proposal were to proceed, an equality impact assessment would be carried out to identify the accessibility of the new school building. The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design 2014 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.

The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that

good practice is followed, including the application of the Council's policies on equal opportunities.

The proposal would need to ensure compliance with the Council's policies on equal opportunities.

### 3.4. Marriage and Civil Partnership

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on marriage and civil partnership?

	Yes	No	N/A
Marriage			X
Civil Partnership			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

**What action(s) can you take to address the differential impact?**

**If no differential impact, explain the reason(s) for this assessment:**

N/A

### Pregnancy and Maternity

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy			
Maternity			N/A

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

**What action(s) can you take to address the differential impact?**

**If no differential impact, explain the reason(s) for this assessment:**

The Council's procedure for securing staffing requirements to implement this proposal

would be used in implementing this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

If the proposal were to proceed, an equality impact assessment would be carried out to identify the accessibility of the new school building. The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design 2014 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.

**3.6 Race**

Will this Policy/Strategy/Project//Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White		X	
Mixed / Multiple Ethnic Groups		X	
Asian / Asian British		X	
Black / African / Caribbean / Black British		X	
Other Ethnic Groups		X	

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
<p>The proposal would not have a differential impact upon one particular ethnic group as the provision would be available to all.</p> <p>Specialist provision in Cardiff for children with complex learning disabilities or autism spectrum conditions have a higher than average BME population.</p> <p>All pupils, of all ethnicities, will continue to have access to specialist provision, in all settings, on an equal basis.</p>
<b>What action(s) can you take to address the differential impact?</b>
The provision being proposed would be accessible to all ethnic groups and compliance with the Council's policies on equal opportunities would need to be ensured.
<b>If no differential impact, explain the reason(s) for this assessment:</b>

--

**3.7 Religion, Belief or Non-Belief**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist		X	
Christian		X	
Hindu		X	
Humanist		X	
Jewish		X	
Muslim		X	
Sikh		X	
Other		X	

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
<b>What action(s) can you take to address the differential impact?</b>
<b>If no differential impact, explain the reason(s) for this assessment:</b>
The proposal would not have a differential impact upon people with different religions, beliefs or non-beliefs as the provision would be available to all.
The senior staff in a school would be best placed to manage diversity in terms of belief. (e.g. provision of a space for prayer).

**3.8 Sex**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on men and/or women?

	Yes	No	N/A
Men		X	
Women		X	

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
<b>What action(s) can you take to address the differential impact?</b>
<b>If no differential impact, explain the reason(s) for this assessment:</b>
Maintained school provision admits pupils of both sexes and this would continue to be the case.  The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

### 3.9 Sexual Orientation

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
Bisexual		x	
Gay Men		x	
Gay Women		x	
Heterosexual		x	

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
<b>What action(s) can you take to address the differential impact?</b>
<b>If no differential impact, explain the reason(s) for this assessment:</b>
(Fears that recruitment opportunities could be affected by sexual orientation)  Evidence collated by the Stonewall lobby group alleges that Lesbian, Gay, Bisexual people are likely to be discriminated against in workplace recruitment.  The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that

good practice is followed, including the application of the Council's policies on equal opportunities.

### 3.10 Language

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on Welsh Language?

	Yes	No	N/A
Welsh Language		x	
Other languages		x	

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
<b>What action(s) can you take to address the differential impact?</b>
<b>If no differential impact, explain the reason(s) for this assessment:</b>
<p><b>Language support</b></p> <p>The proposal will not directly impact on the level of support provided. The allocation of teachers and BTAs is usually in place for the period of the academic year but is liable to change throughout the year to meet fluctuations in demand.</p> <p><b>Welsh Language</b></p> <p>It is not anticipated that there will be any negative impact on the Welsh Language, as a result of this proposal.</p> <p>The teaching of Welsh within an English medium setting is subject to the requirements of the National Curriculum. This would not change with the expansion of the school. This proposal does not seek to change the number of Welsh-medium primary or secondary school places available in the area.</p>

The Council works closely and constructively with partners on its Welsh Education Forum, which includes representatives of nursery, primary, secondary and further education, childcare, RhAG and the Welsh Government. The Forum actively informs the planning of Welsh-medium places, to continue to drive the Council's plan to sustainably increase the number of learners within Welsh-medium schools and those learning Welsh in English-medium schools.

The council monitors birth rates, the yield from proposed housing and the patterns of take-up in Welsh-medium provision at primary and secondary age, with a view to bringing forward appropriate plans to meet any increased demand.

Whilst forecasts, based on the number of children in the Welsh-medium primary, indicate that additional capacity will be required to meet the demand for places in Welsh-medium secondary schools, separate proposals will be brought forward at the appropriate time to ensure there are sufficient places available.

The Council, and its partners on the Welsh Education Forum, are committed to driving the increase in number of pupils educated through the medium of Welsh, to meet the targets within Cardiff's WESP, and to meet the targets set out in the Welsh Government's Cymraeg 2050 strategy.

The Council must ensure that the expansion of school provision is brought forward in a strategic and timely manner, which does not compromise existing provision. Expanding Welsh-medium secondary school provision would, inevitably, have an impact on the take-up of places in other schools, and in turn on the ability of schools to balance budgets and to attract or retain staff.

The proposals do not include opportunities for developing Welsh medium ALN provision. Steps to expand specialist ALN provision in the Welsh medium sector are being taken forward separately through the Welsh Education Strategic Plan (WESP), the Educational Tribunal (ALNET) Act Regional Implementation Plan and through the Cardiff ALN Strategy.

Actions taken so far include:

- A new primary SRB at Ysgol Pwll Coch opening January 2019 for up to 20

pupils. The SRB will open with three pupils, and will have capacity to expand to 20 places. This development is in addition to the well-established SRB at Ysgol Coed y Gof for 10 pupils;

- Improvements in secondary SRB accommodation at Ysgol Glantaf, and an increase in the published number from 10 to 30 places. In 2018-19, there are 14 young people in the SRB, with scope to expand in future years;
- A primary 'wellbeing class' was established in 2016-17, offering 6 month placements for up to 8 pupils (per cohort) with significant emotional health and wellbeing needs. The class is currently hosted at Ysgol Pen y Groes;
- A secondary 'virtual PRU' offering specialist support to up to 18 pupils (per cohort) at risk of exclusion in the three WM secondary schools. The provision was established January 2018.

Since 2016 the number of specialist places available to learners in the Welsh medium sector have increased from 20 SRB places in 2015-16 (10 places at Ysgol Coed y Gof SRB; 10 places at Ysgol Glantaf SRB) to 60 SRB places and 26 assessment/ 'PRU-type' places in 2018-19.

At January 2019, approximately 25 SRB places will be taken-up, with capacity for growth of up to 35 places. Numbers accessing the wellbeing class and the virtual PRU fluctuates: the local authority is keeping capacity under review and will take steps to extend places in response to pupil needs.

The ALNET Regional Implementation Plan, Priority 7, is to 'Review and improve Welsh medium provision and specialist support to increase regional capacity to support ALN'. Cardiff Council are leading on this priority.

The objectives are to:

- Conduct an analysis of the prevalence of ALN and level of need in the Welsh medium sector in each LA across the region (Cardiff, Vale of Glamorgan, Bridgend, Rhondda Cynon Taf, Merthyr);
- Map Welsh medium provision and support available across the region;
- Increase sharing of good practice for ALN in the Welsh medium sector;

- Ensure that the ALNET Regional Implementation Plan supports and complements regional WESP priorities.

#### 4. Consultation and Engagement

What arrangements have been made to consult/engage with the various Equalities Groups?

The Council's Accessibility Officer would be given the opportunity to comment on the scheme.

Subject to approval, there will be a full public consultation on the proposal.

#### Summary of Actions [Listed in the Sections above]

Groups	Actions
Age	See Generic over-arching actions below
Disability	
Gender Reassignment	
Marriage & Civil Partnership	
Pregnancy & Maternity	
Race	
Religion/Belief	
Sex	
Sexual Orientation	
Language	
Generic Over-Arching [applicable to all the above groups]	

	such as, BS8300, Part M and relevant Building Bulletins.
--	--

**6. Further Action**

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area’s Business Plan to be monitored on a regular basis.

**7. Authorisation**

The Template should be completed by the Lead Officer of the identified Policy/Strategy/Project/Function and approved by the appropriate Manager in each Service Area.

Completed By: Rosalie Phillips	Date: November 2020
Designation: Project Officer	
Approved By:	
Designation:	
Service Area:	

On completion of this Assessment, please ensure that the Form is posted on your Directorate’s Page on CIS - *Council Wide/Management Systems/Equality Impact Assessments* - so that there is a record of all assessments undertaken in the Council.

For further information or assistance, please contact the Citizen Focus Team on 029 2087 3059 or email [citizenfocus@cardiff.gov.uk](mailto:citizenfocus@cardiff.gov.uk)

Page 267

**Background**

In 2008, a retrospective Strategic Environmental Assessment (SEA) of Cardiff’s 21<sup>st</sup> Century: A Strategic Framework for a School Building Improvement Programme (published in 2006) was carried out based on the guidance that supports the European SEA Directive 2001/42/EC.

The retrospective approach to assessment was quality assured by an external consultant and their independent compliance review determined that the report detailing the assessment on the strategic framework met the key requirements set out for reporting the SEA process as required by the SEA Directive.

The retrospective assessment provides the basis for assessing current and future school organisation proposals at a strategic level.

If a proposal were to proceed, an environmental assessment would be carried out as part of the planning application process.

**To request a copy of the assessment on the Strategic Framework please contact Rachel Willis, 029 2087 3946, [RWillis@cardiff.gov.uk](mailto:RWillis@cardiff.gov.uk)**

Proposal

**It is proposed from September 2024 to:**

- Replace the Cathays High School buildings with new build accommodation on the Maindy Centre site adjacent to Crown Way and North Road
- Expand the school from 1,072 places (5.5 Forms of Entry with 247 sixth form places) to 1,450 places (8 Forms of Entry with 250 sixth form places)
- Expand the current Specialist Resource Base (SRB) for learners with Autism Spectrum Condition from 16 to 50 places in purpose-built accommodation in the new school buildings
- Upgrade community facilities in Cathays and Gabalfa through the significantly enhanced school facilities being made available for shared use with the wider local community

**Condition of existing school buildings**

**Quality and Standards**

Page 268

<b>xx</b>	<b>= very incompatible; very negative effect</b>
<b>x</b>	<b>= incompatible; negative effect</b>
<b>✓</b>	<b>= compatible; positive effect</b>
<b>✓✓</b>	<b>= very compatible; very positive effect</b>
<b>0</b>	<b>= no links; neutral effect</b>
<b>? and/or mitigation</b>	<b>= uncertain effects</b>
<b>DNA</b>	<b>= data not available</b>

See table headers below: \* Comparison of the preferred option to a possible alternative option(s) are required in a SA/SEA.

<b>SEA objective</b>	<b>Proposal to establish two new junior classrooms and a Teacher Training facility at Ysgol Y Wern Primary School.</b>		<b>Do nothing</b>	
	<b>Rating</b>	<b>Commentary/ explanation of compatibility with SEA objective</b>	<b>Rating</b>	<b>Commentary/ explanation of compatibility with SEA objective</b>



SEA objective	Proposal to establish two new junior classrooms and a Teacher Training facility at Ysgol Y Wern Primary School.		Do nothing	
	Rating	Commentary/ explanation of compatibility with SEA objective	Rating	Commentary/ explanation of compatibility with SEA objective
		<p>employees, visitors, patients and students</p> <ul style="list-style-type: none"> <li>o encourage sustainable transport – walking, cycling, public transport and car sharing</li> <li>o reduce car use.</li> </ul> <p>- A School Travel Plan is specifically designed to address the transport needs of pupils and staff and will vary according to the nature of the education being provided and the catchment area of the school.</p> <p>School safety zones would be set up to address health and safety concerns from increased traffic flows in the school vicinity.</p>		
3. Promote health and wellbeing by protecting and enhancing Public Open Space (POS) and improving access to POS	0	As the open space in and around a school site is not accessible to the public the only potential impact of the option on the open space would be loss of visual amenity value.	x	See comments next to SEA Objective 1 above
4. Minimise air, light and noise pollution associated with building development and traffic congestion	0  0	<p>a) Those delivering the scheme would be encouraged to minimise air, light and noise pollution during any works.</p> <p>b) To reduce congestion and associated pollution the following would be considered:</p> <ul style="list-style-type: none"> <li>▪ Formalising the parking regime outside the school to discourage unsafe parking and help with enforcement.</li> <li>▪ The school agrees to a Travel Plan which includes schemes such as the Park Safe / Walk Safe scheme which encourage parents to park further away from the school.</li> </ul>	x	See comments next to SEA Objective 1 above

SEA objective	Proposal to establish two new junior classrooms and a Teacher Training facility at Ysgol Y Wern Primary School.		Do nothing	
	Rating	Commentary/ explanation of compatibility with SEA objective	Rating	Commentary/ explanation of compatibility with SEA objective
5. <i>Protect and enhance biodiversity, flora and fauna</i>	0	Site surveys will be undertaken to establish levels of biodiversity and will explore opportunities to develop appropriate initiatives	x	See comments next to SEA Objective 1 above
6. <i>Protect and enhance the landscape (habitats/visual amenities)</i>	0	Site surveys will be undertaken to establish levels of biodiversity and will explore opportunities to develop appropriate initiatives	x	See comments next to SEA Objective 1 above
7. <i>Conserve water resources and increase water efficiency in new developments and promote sustainable urban drainage systems</i>	0	This would not be in scope as the proposed scheme is to refurbish and reconfigure internal spaces.	x	See comments next to SEA Objective 1 above
8. <i>Promote regeneration by delivering inclusive schools that will improve equality of opportunity and access for all</i>	0	The schools would be designed to be in compliance with the BREEAM Excellent specification, minimising running costs, construction costs and detrimental environmental impact. Proposals are progressed in line with Welsh Government Community Benefit Measurement Tool which encourages reduced consumption, waste reduction and recycling	x	See comments next to SEA Objective 1 above
9. <i>Protect and enhance designated historic assets</i>	0	There are no registered historic assets on the school site.	x	See comments next to SEA Objective 1 above

## Conclusion

The proposal has been assessed to be compatible with the environmental objectives used to assess the goal and principles of the “21st Century Schools: A Strategic Framework for A School Building Improvement Programme” that underpin school organisation proposals.

Where the assessment has identified a potential negative environmental impact in terms of an increase in the volume of traffic (Objective 4), measures to mitigate the effect are detailed.

It is proposed to:

- Expand Cathays High School from 1,072 places (5.5 Forms of Entry with 247 sixth form places) to 1,450 places (8 Forms of Entry with 250 sixth form places), from September 2023;
- Replace the Cathays High School buildings with new build accommodation on the Maindy Centre site adjacent to Crown Way and North Road;
- Expand the current Specialist Resource Base (SRB) for learners with Autism Spectrum Condition from 16 to 50 places in purpose-built accommodation in the new school buildings;
- Upgrade community facilities in Cathays and Gabalfa through the significantly enhanced school facilities being made available for shared use with the wider local community.

**ANTI-MONEY LAUNDERING POLICY****FINANCE, MODERNISATION & PERFORMANCE (COUNCILLOR  
CHRIS WEAVER)****AGENDA ITEM: 7**

---

**Reason for this Report**

1. To seek approval from Cabinet for the Anti-Money Laundering Policy, to update and replace the existing Money Laundering Policy and Procedure.

**Background**

2. Money laundering is the process of making money generated by a criminal activity, such as drug dealing or theft appear to have come from a legitimate source, through a process of cleansing criminal proceeds to disguise their illicit origins. The National Crime Agency reports that money laundering costs the UK more than £100 billion pounds a year.
3. The draft Anti-Money Laundering Policy is aligned to the aspirations of the Counter-Fraud and Corruption Strategy, and to the Council's Risk Management Strategy and Policy. It provides adequate safeguards and reporting arrangements, to prevent the Council from being used by third parties for money laundering, and to prevent terrorist financing.
4. The policy is designed to replace and update the existing Money Laundering Policy and Procedure, as approved by Cabinet on 5 June 2015, and it incorporates the requirements of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and the Money Laundering and Terrorist Financing (amendment) Regulations 2019, as well as other relevant legislation. The main changes to the policy, relate to a strengthening of both the processes for client verification checks, and to the mechanisms for internal referral. The policy is intended to be supported by targeted training for those working in high-risk areas.
5. The draft policy has been subject to consideration and comment from Senior Management Team, Trade Unions, the Equalities Team and the Audit Committee. Comments received have been incorporated into the current attached draft policy in Appendix A.

## Issues

6. The policy sets out background information, including an overview and definition of the process of money laundering, the obligations on the Council to mitigate the risk and, it provides information about relevant legislation and offences. The contact details of the Council's Money Laundering Reporting Officer and the Data Protection Officer are provided for further support, guidance and referral, as appropriate.
7. A primary focus of the policy is on setting out the responsibilities of Officers and Members. All staff are already required to complete fraud awareness training, and the policy proposes that all staff have a reporting responsibility in the event of any concerns, and that at a minimum, all staff who receive cash, monitor cash receipts or who manage staff in these areas, and all solicitors must complete further eLearning on anti-money laundering. This includes Operational Managers in these areas, who are responsible for customer verification, due diligence checks and internal referrals.
8. A number of high-risk areas are highlighted within the policy for which particular vigilance is required, including the receipt of cash payments, the entering of new business relationships, the sale of land and properties, grants and loans to third parties, and a pattern of overpayments and requests for refunds. The Council has set a cash payment limit of £10,000 at which point a higher level of due diligence checks are necessary. A series of smaller, linked cash transactions also require a higher level of checks, as this could be an attempt for funds from illegal activities to go unnoticed.
9. The policy contains a 'Due Diligence and Know Your Customer Procedure', which represents an appraisal of an individual or organisation that should be undertaken before entering into a business transaction. Criminals often seek to mask their identity by using complex and opaque ownership structures, and the purpose of customer due diligence is to know and understand a client's identity and business activities so that any money laundering risks can be properly managed. Effective customer due diligence is therefore, a key part of anti-money laundering defences. By knowing the identity of a client, including matters of business ownership and control, the Council not only fulfils its legal and regulatory requirements, it equips itself to make informed decisions about the client's standing and acceptability.
10. The process for customer due diligence must be completed for all cases where there is a high risk of money laundering in accordance with section 8 of this policy, which is to be documented on the respective form as appended to the policy for a private individual (Appendix A) or a business (Appendix B). In order to proceed with such transactions, documented Operational Manager approval is required on the respective form, and in the event of any concerns, or if further advice or guidance is required, a referral is to be made to the Money Laundering Reporting Officer before proceeding.

11. In order to maintain the efficient application of the policy, it is proposed that the Audit Manager is authorised to amend the procedure and supplementary forms listed in Appendices A-D, as may be necessary from time to time, in light of operational experience.

### **Reason for Recommendation**

12. To enable the Cabinet to consider the proposed Anti-Money Laundering Policy.

### **Legal Implications**

13. The Council has a duty under the Terrorism Act 2000, the Proceeds of Crime Act 2002 and The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 to take all reasonable steps to minimise the risk of money laundering occurring through safeguards and reporting arrangements in order to detect and avoid involvement in money laundering.
14. The contents of this Report contains all relevant information on the subject of anti-money laundering so as to enable Cabinet to make an informed decision on the draft policy.
15. In considering this matter, the Council must have regard to its public sector equality duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The Protected characteristics are: age, gender reassignment, sex, race – including ethnic or national origin, colour or nationality, disability, pregnancy and maternity, marriage and civil partnership, sexual orientation, religion or belief – including lack of belief. An Equalities Impact Assessment has been carried out to identify the equalities implications and due regard should be given to the outcomes of the Equalities Impact Assessment.

### **Financial Implications**

16. This Policy sets out the expectations of all officers and members and provides a detailed toolkit in order for those roles and responsibilities to be carried out and reduce the risk of being unwittingly complicit in money laundering activities. It is not anticipated that additional financial resources are required in order to undertake these duties but where additional interventions may be required then there is a need to identify financial resources prior to proceeding.

### **HR Implications**

17. There are HR implications for this policy with regards to employee training and management actions and responsibilities, these are all set out in the policy. These will be communicated to employees should the policy be adopted.

## Property Implications

18. The Strategic Estates Department notes that the Anti-Money Laundering Policy sets out the expectations of all officers in this area and provides a detailed toolkit in order to reduce the risk of being unwittingly complicit in money laundering activities. Where there are land transactions within the Council's estates, they should be done so in accordance with the Council's Anti-Money Laundering Policy and all necessary due-diligence required in this regard should be undertaken as appropriate through the Council's County Surveyor.

## RECOMMENDATIONS

The Cabinet is recommended to:

1. Approve the Anti-Money Laundering Policy; and
2. Authorise the Audit Manager authority to amend the procedure and supplementary forms (Appendix A) as may be necessary from time to time, in light of operational experience.

<b>SENIOR OFFICER</b>	<b>RESPONSIBLE</b>	<b>Christopher Lee</b> <b>Corporate Director Resources</b>
		11 December 2020

*The following appendices are attached:*

**Appendix A:** Draft Anti Money Laundering Policy

**Appendix B:** Equality Impact Assessment

# Anti-Money Laundering Policy

Cardiff Council



Gweithio dros Gaerdydd, gweithio drosoch chi.  
Working for Cardiff, working for you.



<b>Contents</b>	<b>Page</b>
<a href="#">Introduction</a>	3
<a href="#">Legal Background</a>	4
<a href="#">Data Protection</a>	6
<a href="#">Scope of the policy</a>	6
<a href="#">What is Money Laundering</a>	7
<a href="#">Responsibilities</a>	7
<a href="#">Training</a>	8
<a href="#">Due Diligence</a> <input type="checkbox"/> <a href="#">Money Laundering Risks</a> <input type="checkbox"/> <a href="#">High Risk Areas</a>	8
<a href="#">Record Keeping</a>	11
<a href="#">Reporting</a>	12
<a href="#">Definitions</a>	13
<b>Appendices</b>	
<a href="#">Customer Due Diligence Form – Private Individual</a>	A
<a href="#">Customer Due Diligence Form – Business</a>	B
<a href="#">Money Laundering Disclosure form</a>	C
<a href="#">Due Diligence &amp; Know Your Customer Procedure</a>	D

## 1. Introduction

- 1.1 The Council's reputation is underpinned by ethical behaviour, financial probity and honesty. In carrying out its functions and responsibilities, the Council seeks to promote a culture of openness and fairness. Any cases of fraud, bribery, corruption or other dishonesty could adversely affect the Council's reputation, and put its ability to achieve its policies and objectives at risk.
- 1.2 Money laundering is the process by which criminal proceeds are cleansed to disguise their illicit origins. The National Crime Agency reports that money laundering costs the UK more than £100 billion pounds a year. Criminals will attempt to distance themselves from their crimes by finding safe havens for their profits, where they can avoid confiscation orders, and where those proceeds can be made to appear legitimate.
- 1.3 This policy enables the Council to meet the legal requirements associated with the Money Laundering Regulations, in a way that is proportionate, in accordance with the Council's Risk Management Strategy and Policy, whilst ensuring that there are adequate safeguards and reporting arrangements in place, to prevent the Council from being used by third parties for the purpose of money laundering. It is intended to review this policy every two years.
- 1.4 The Regulations apply to a number of different business sectors, including accountants, financial service businesses, estate agents and solicitors. Every business covered by the Regulations must be monitored by a supervisory authority, (for example, the Financial Conduct Authority) or belong to a professional body like the Law Society.
- 1.5 The Treasury is responsible for appointing supervisors and for the Money Laundering Regulations, which sets out the role of supervisors and gives them powers to effectively monitor their respective sectors.
- 1.6 The following business sectors are supervised by HMRC:

Money service businesses ( <a href="#">guidance link</a> )	Those which are not supervised by the Financial Conduct Authority (FCA)
High value dealers ( <a href="#">guidance link</a> )	E.g., for this policy, any business that accepts or makes high value cash payments of £10,000 or more in exchange for goods (or equivalent in any currency).
Trust or company service providers ( <a href="#">guidance link</a> )	E.g., any company whose business is to form companies, or other legal persons, act as a director or secretary of a company. Trust or company service provider services can be provided by anyone including accountants and solicitors.
Accountancy service providers ( <a href="#">guidance link</a> )	Those which are not supervised by a professional body (give tax advice or accountancy services on a commercial basis), (e.g. auditors who carry out statutory audit work, accountants who provide accountancy services to clients, tax advisers and consultants who provide advice to clients about their tax affairs, payroll agents that provide accountancy services and/or tax advice).

Estate agency businesses ( <a href="#">guidance link</a> )	Who on instructions from a customer who wants to buy or sell an interest in land, in the UK or abroad, and introduce your customer to a third party who wants to buy or sell an interest in land. Who act after such an introduction to secure the sale or purchase of the interest in land.
Bill payment service providers	Those which are not supervised by the FCA
Telecommunications, digital and IT payment service providers	Those which are not supervised by the FCA
Businesses trading in art and high value letting agents	These two groups were added in 2019 amendment legislation

- 1.7 The Council is committed to maintaining robust arrangements to prevent money laundering. Local Authorities can be subject to the provision of the Money Laundering Regulations, and must be vigilant in any transactions that may have money laundering implications. Particular care must be exercised when undertaking work on a commercial basis on behalf of a client.
- 1.8 In order to maintain the efficient application of the Policy, the Audit Manager is authorised to amend the procedure and supplementary forms listed in Appendices A-D, as may be necessary from time to time, in light of operational experience.

## 2. Legal Background

- 2.1 The relevant legislation and regulations relating to money laundering are:
- Terrorism Act 2000
  - Anti-terrorism, Crime and Security Act 2001
  - Proceeds of Crime Act 2002
  - The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
  - Criminal Finances Act 2017
  - The Money Laundering and Terrorist Financing (amendment) Regulations 2019
- 2.2 An obligation is placed on the Council and its employees, to establish internal procedures, to prevent the use of our services for money laundering and to prevent terrorist financing. The Council has a Money Laundering Reporting Officer (MLRO) to receive disclosures from employees of suspicions of money laundering activity.
- 2.3 There are three principal offences under the Proceeds of Crime Act 2002 (POCA) in respect of money laundering (Maximum: 14 years custody):

**1. Concealing** - Section 327 Proceeds of Crime Act 2002

**A person commits an offence -**

If they conceal, disguise, convert, transfer, or remove from the UK, any criminal property

**2. Arrangements** - Section 328 Proceeds of Crime Act 2002

<p><b>A person commits an offence -</b> If they enter into or become concerned in an arrangement which they know or suspect facilitates (by whatever means) the acquisition, retention, use or control of criminal property by or on behalf of another person.</p>
<p><b>3. Acquisition, use and possession</b> - Section 329 Proceeds of Crime Act 2002</p>
<p><b>A person commits an offence -</b> If they acquire, use, have possession of criminal property.</p>
<p><b>But a person does not commit such an offence -</b> If they make an authorised disclosure; intended to make a disclosure but had a reasonable excuse for not doing so; acquired or used or had possession of the property for adequate consideration. They know, or believe, that the criminal conduct occurred outside the UK, and the criminal conduct was not unlawful in that country.</p>

2.4 There are additional Proceeds of Crime Act 2002 (POCA) offences in respect of money laundering:

<p><b>Failure to disclose</b> - Section 332 Proceeds of Crime Act 2002 (Max: 5 years custody)</p>
<p><b>A person nominated to receive disclosures commits an offence -</b> If they know or suspect that another person is engaged in money laundering, the person or the whereabouts of any of the laundered property can be identified and the knowledge came to them in a disclosure, or they believe that the information will or may assist in identifying that person or the whereabouts of the laundered property. They do not make the required disclosure as soon as is practicable after the information comes to them.</p>
<p><b>But a person does not commit such an offence –</b> If they have a reasonable excuse for not making the required disclosure, they know, or believe, that the criminal conduct occurred outside the UK, and the criminal conduct was not unlawful in that country.</p>

<p><b>Tipping off</b> - Section 333 Proceeds of Crime Act 2002 (Maximum: 2 years custody)</p>
<p><b>A person commits an offence:</b> If they know or suspect that a disclosure has been made, and they say or do something which is likely to prejudice any investigation which might be conducted</p>
<p><b>But a person does not commit such an offence:</b> If they did not know or suspect that the disclosure was likely to be prejudicial; is a professional legal adviser providing legal advice (not with the intention of furthering a criminal purpose).</p>

<p><b>Offences of prejudicing investigation</b>- Section 342 Proceeds of Crime Act 2002 (Maximum: 2 years custody)</p>
<p><b>A person commits an offence:</b> If they make a disclosure which is likely to prejudice the investigation, or falsify, conceal, destroy or otherwise dispose of documents which are relevant to the investigation.</p>

**But a person does not commit such an offence -**

If they do not know or suspect that the disclosure is likely to prejudice the investigation, or they are a professional legal adviser providing legal advice (not with the intention of furthering a criminal purpose).

*Important, please note, the tables include summary information, refer to the [Proceeds of Crime Act 2002](#) for the full wording.*

All persons identified in 'section 6 – Responsibilities' must be aware of their legal responsibilities, as serious criminal sanctions may be imposed.

- 2.5 Money laundering and terrorist financing guidance is available from professional bodies, the Institute of Chartered Accountants in England and Wales is a supervisory body recognised by HM Treasury for the Money Laundering Regulations 2017. The Institute of Internal Auditors, the Chartered Institute of Public Finance & Accountancy, and the Law Society provide money laundering guidance.
- 2.6 The Council must also ensure that it meets its obligations in accordance with corporate criminal offence legislation (Criminal Finances Act). Support and guidance is available from the MLRO.

### **3. Data Protection**

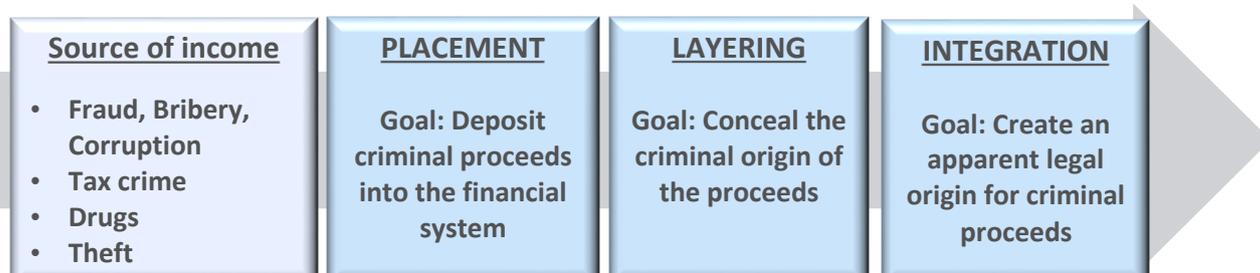
- 3.1 In accordance with the Data Protection Act 2018 the Council does not have to comply with data subject access requests that are likely to prejudice the prevention or detection of crime, or the capture or conviction of offenders.
- 3.2 Similarly, personal data that relates to knowledge or suspicion of money laundering (i.e. data that has been processed to help prevent or detect crime) need not be disclosed under a subject access request, if to do so could constitute *tipping off*. Both of these exceptions apply to the personal data likely to be contained in records relating to internal money laundering reports.
- 3.3 If you have any concerns, or require any advice in this area, contact the Money Laundering Reporting Officer (029 2087 2284) or the Data Protection Officer (029 2087 3332) promptly.

### **4. Scope of the Policy**

- 4.1 This Policy sets out the procedures which must be followed, and this section should be read in conjunction with the Due Diligence and Know Your Customer Procedure, the Counter-Fraud and Corruption Strategy ([1.CM.120b](#)) and the Whistle Blowing Policy ([1.C.015](#)).
- 4.2 This policy applies to:
- All Council employees (permanent, temporary or casual) and agency staff
  - Elected Members
  - Consultants undertaking Council work, Contractors working for the Council, and Partners
  - Suppliers and those providing services under contract with the Council
  - Volunteers
  - Anyone carrying out work for, or on behalf of, the Council
- 4.3 Failure to comply with these procedures may lead to disciplinary action being taken.

## 5. What is Money Laundering?

- 5.1 Money laundering is the process of making money generated by a criminal activity, such as drug dealing or theft appear to have come from a legitimate source.
- 5.2 The money from the criminal activity is considered dirty, and the process "launders" it to make it look clean. Money laundering is itself a crime.



## 6. Responsibilities

- 6.1 Cardiff Council has put in place appropriate and proportionate anti-money laundering safeguards and reporting arrangements. The following persons must be aware of their responsibilities, as serious criminal sanctions may be imposed for breaches of legislation, such as failure to report suspicion of money laundering.

<b>Roles</b>	<b>Primary Responsibilities</b>
Elected Members	<ul style="list-style-type: none"> <li>• Raise concerns promptly</li> </ul>
Employees / consultants / volunteers	<ul style="list-style-type: none"> <li>• Complete Fraud Awareness Training</li> <li>• At a minimum, all staff who receive cash, monitor cash receipts or who manage staff in these areas, and all solicitors must complete eLearning on anti-money laundering</li> <li>• Apply customer due diligence / maintain client identification procedures as appropriate</li> <li>• Maintain robust record keeping procedures</li> <li>• Raise concerns promptly</li> </ul>
<i>Those in the following roles have all responsibilities as above, with further role specific responsibilities as below</i>	
Managers	<ul style="list-style-type: none"> <li>• Appropriately risk assess and mitigate money laundering risks within areas of responsibility</li> <li>• Retain sufficient evidence for monitoring and review of the identification and management of money laundering risks</li> <li>• Ensure that all relevant persons are aware of the requirements and obligations placed on Cardiff Council, and on themselves as individuals</li> </ul>
Operational Managers	<p>Further to Manager Responsibilities:</p> <ul style="list-style-type: none"> <li>• Complete anti-money laundering eLearning where responsible for verifying customer due diligence evidence, for approval, or disclosure to the MLRO</li> <li>• Ensure annual training needs are considered as part of the Personal Review process and that officers considered to be in relevant roles of increased money laundering risk complete the money laundering, eLearning module every 2 years.</li> </ul>

Money Laundering Reporting Officer	<ul style="list-style-type: none"> <li>• Provide anti-money laundering advice, guidance and training</li> <li>• Investigate reports and disclosures of money laundering</li> <li>• Promptly report suspicions of money laundering to the National Crime Agency.</li> </ul>
Section 151 Officer & Monitoring Officer	<ul style="list-style-type: none"> <li>• Ensure the Council has a Money Laundering Reporting Officer</li> <li>• Champion internal procedures and systems to identify report and mitigate suspicions of money laundering</li> </ul>

6.2 The nominated Money Laundering Reporting Officer should be notified of any activity or suspicion of money laundering:

✉ [fraud@cardiff.gov.uk](mailto:fraud@cardiff.gov.uk)

☎ 029 2087 2284

## 7. Training

- 7.1 All staff are required to undertake mandatory fraud awareness training, which includes an overview of money laundering.
- 7.2 At a minimum, all staff who receive cash, monitor cash receipts or who manage staff in these areas, and all solicitors must complete eLearning on anti-money laundering. This includes Operational Managers in these areas, who are responsible for verifying customer due diligence evidence, and making disclosures to the MLRO. The eLearning should be completed at least every 2 years for refresher purposes.
- 7.3 Each Directorate should carry out annual training needs assessments as part of the Personal Review process and officers considered to be in relevant roles of increased money laundering risk will complete a money laundering eLearning module.
- 7.4 Additional specific training may be delivered upon request, to the MLRO.

## 8. Due Diligence

- 8.1 The terms 'Due Diligence' and 'Know Your Customer', refer to an appraisal, of an individual or organisation, that the Council should undertake before entering into a business transaction to verify the identity of parties and assess the potential risks of illegal intentions.
- 8.2 It is important that the Council is aware of whom it is transacting with, including the structure relevant entities, so all beneficiaries are appropriately disclosed/identified. The approach should be risk-based and proportionate; the high-risk money laundering activities are identified within Section 9 of this policy.
- 8.3 The 'Due Diligence and Know Your Customer Procedure' set out the process that must be followed, and the circumstances in which 'Customer Due Diligence Forms' must be completed, and disclosures are to be made.
- 8.4 Since the 30th June 2016, companies have been required to declare who owns or controls them to Companies House. There is a requirement to notify Companies House of discrepancies identified as part of the "know your customer" checks before establishing a business relationship with another entity. Companies House must then investigate and, if necessary, take action to resolve the discrepancy.

8.5 If there are any doubts about the identity of a customer / business partner, the Council must obtain further verification immediately. Should you have concerns about potential money laundering, following a money laundering disclosure, you will need to consider if and how you should change the way you interact with your client to avoid committing the offences of:

- **Tipping off**
- **Prejudicing an investigation**

8.6 Making a Disclosure does not necessarily mean that all work on a client’s file must stop. However, if you do not have a defence against money laundering from the National Crime Agency, you are prohibited from carrying out any act that would amount to a principal money laundering offence (see [paragraph 2.3](#)).

8.7 Before establishing a *client* relationship or accepting an engagement, the Council must have controls in place to address the risks arising from it.

Land or Property Sale	When you establish a business relationship, with a customer or another party in a land or property sale. There are obligations for solicitors in this area.
New business relationship	When you establish a new business relationship (formal or informal) you need to obtain information on: <ul style="list-style-type: none"> <li>• the purpose of the relationship</li> <li>• the intended nature of the relationship - for example where funds will come from, the purpose of transactions, and so on</li> </ul>
Changing circumstances	We are required to keep up-to-date information on our customers and to: <ul style="list-style-type: none"> <li>• amend our risk assessment of a particular customer if their circumstances change</li> <li>• carry out further due diligence measures if necessary</li> </ul> <p>Changes of circumstance may include:</p> <ul style="list-style-type: none"> <li>• a big change in the level or type of business activity</li> <li>• a change in the ownership structure of a business</li> </ul>
Occasional transactions	The Council should carry out customer due diligence measures when occasional transactions are carried out. These are transactions that are not carried out within an ongoing business relationship where the value is £10,000 or more. This applies whether it is a single transaction or linked transactions.
Linked Transactions	Linked transactions are individual transactions of less than £10,000 that have been deliberately broken down into separate, smaller transactions to avoid customer due diligence checks. Some issues to consider are: <ul style="list-style-type: none"> <li>• a number of payments have been made by the same customer in a short period of time</li> <li>• It is possible that a number of customers have carried out transactions on behalf of the same person.</li> </ul>

## 🚫 Money Laundering Risks

- 8.8 Remember, the aim of the money launderer is to convert their cash from crimes, into legitimate sources of income. Everyone who receives cash or monitors cash receipts or manages staff in these areas, and all solicitors need to be alert to the risk.
- 8.9 When dealing with the Council, they could attempt to purchase or lease assets (land, property, buildings), good or services etc. They could sell on, or sublet these assets and place payments into a bank account.
- 8.10 Receiving a refund from the Council could appear to be a legitimate source of a payment into their bank account; similarly, if a money launderer is able to sell goods at significantly inflated prices, the income could appear to be legitimate.
- 8.11 The following areas are examples of those most susceptible to money laundering:
- Sale of properties and land
  - Receipt of high value cash sums
  - Overpayments and requests for refunds (mainly linked to Revenue Accounts)
  - Grant and loans to third parties
- 8.12 Possible indicators of money laundering activity:
- Unusually large cash transactions (£10,000 or more)
  - Numerous small transactions which appear to be linked and combined exceed £10,000
  - Where a transaction appears to be unusual in nature
  - The absence of an obvious legitimate source of funds, for example, a property purchase without a mortgage
  - Repeated cancelling of transactions
  - Where a customer pays funds to the Council but then ends the transaction for no apparent reason, or unexpectedly asks for money to be refunded or forwarded to a third party
  - An overpayment or duplicate payment where the refund is later requested (large sum)
  - Individuals or companies that are insolvent but have funds
  - Excessively secretive or obstructive clients
  - Where the customer informs us that funds are coming from one source and at the last minute the funding source changes.
- 8.13 In considering risk, we need to consider factors relating to:
- a) the customers of who we are transacting with
  - b) the countries or geographic areas in which it operates
  - c) the products or services
  - d) the nature of transactions
  - e) the delivery channels
- 8.14 The 'Due Diligence and Know Your Customer Procedure' set out the process that must be followed to ensure we appropriately address areas of risk.

## ⊘ High Risk Areas

- 8.15 Particular care should be exercised in cases where a significant cash amount is involved. The Council has set a cash payment limit of £10,000 at which point additional due diligence checks are necessary.
- 8.16 Vigilance must also be maintained where there are a series of smaller, linked cash transactions, which could be seeking to circumvent due diligence checks.
- 8.17 There are a number of circumstances in which prompt advice must be sought from the MLRO. Advice is required from the MLRO prior to engaging in any:
- Arrangement in which the Council may be operating as a credit or financial institution.
  - Transaction or business relationship with a person established in a 'high risk third country'. The European Commission identifies 'high risk third countries' with strategic deficiencies in their national anti-money laundering and counter financing of terrorism regimes that pose significant threats to the financial system of the European Union. [High risk third countries link](#)
  - Transaction or business relationship with a politically exposed person (PEP). A PEP is a person who has been entrusted within the last year by either a state other than the UK, a community institution, or an international body and who fulfils one of the following public roles:
    - *heads of state, heads of government, ministers and deputy or assistant ministers*
    - *Members of Parliament*
    - *members of supreme courts, or constitutional courts or of other high-level judicial bodies whose decisions are not generally subject to further appeal, except in exceptional circumstances*
    - *members of courts of auditors or of the boards of central banks*
    - *ambassadors, chargés d'affaires and high ranking officers in the armed forces*
    - *members of the administrative, management or supervisory bodies of state-owned enterprises.*
- 8.18 Formal professional advice will be required **before** entering into a business relationship.

## 9. Record keeping

- 9.1 The appropriate 'Customer Due Diligence' (Appendix A / Appendix B) must be completed for all cases, which are at high risk of money laundering in accordance with section 8 of this policy.
- 9.2 The completed 'Customer Due Diligence Form' will either be approved in receipt of satisfactory evidence of identity and business activities by a Directorate Operational Manager (OM), or it will be referred to the MLRO, in accordance with the 'Due diligence and know your customer procedure'.
- 9.3 Whenever a 'Customer Due Diligence Form' is completed, a copy must be provided to the MLRO, for monitoring, guidance and review purposes, via [Fraud@cardiff.gov.uk](mailto:Fraud@cardiff.gov.uk).

- 9.4 All completed Customer Due Diligence Forms must be retained including all customer due diligence measures that are carried out, namely:
- customer identification documents that have been obtained
  - customer correspondence
  - receipts / paying in books
  - further checks carried out
  - risk assessments
  - the rationale for the OM decision
- 9.5 By keeping comprehensive records, you will be able to show that you have complied with the Money Laundering Regulations. This is crucial to protect the Council, if there is an investigation, into one of our customers.
- 9.6 Records must be kept for five years beginning from:
- the date a business relationship ends
  - the date a transaction is completed

## 10. Reporting

- 10.1 Where any person specified in section 6 knows or suspects that money laundering activity has taken place or becomes concerned about their involvement in potential money laundering practices, they must contact the Money Laundering Reporting Officer immediately to discuss those concerns. **Failure to report concerns could constitute a criminal offence.**

✉ [Fraud@cardiff.gov.uk](mailto:Fraud@cardiff.gov.uk)

☎ 029 2087 2284

- 10.2 The Money Laundering Reporting Officer will consider and investigate the facts of the case and if appropriate, make a report to the National Crime Agency. The person who referred the concerns may be required to complete the money laundering disclosure form (Appendix C).
- 10.3 Someone seeking reassurance that their conclusions are reasonable, can discuss them with their line manager, however, reporting to a line manager or colleague alone, is not enough to comply with the legislation.
- 10.4 There should be no discussions with wider colleagues as confidentiality is paramount and the person that is suspected of being involved with money laundering must not be 'tipped off'.
- 10.5 At no time and under no circumstances should any suspicions be voiced to the person(s) suspected of money laundering.

## 11. Definitions

<b>Criminal Conduct</b>	Conduct which constitutes an offence in any part of the United Kingdom, or would constitute an offence in any part of the United Kingdom if it occurred there (S 340 POCA).
<b>Criminal Property</b>	The property constitutes a person's benefit from criminal conduct or it represents such a benefit (in whole or part and whether directly or indirectly), and the alleged offender knows or suspects that it constitutes or represents such a benefit. (S 340 POCA).
<b>Property</b>	Property is all property wherever situated and includes; money, all forms of property, real or personal, heritable or moveable, things in action and other intangible or incorporeal property (S 340 POCA).
<b>Disclosure</b>	A formal report made to the MLRO when there are suspicions of money laundering activity
<b>MLRO</b>	Money Laundering Reporting Officer, the person in the Council who has been designated to receive Disclosures
<b>Money Laundering Legislation</b>	UK legislation and regulations behind the UK anti-money laundering regime: <ul style="list-style-type: none"> <li>• Terrorism Act 2000</li> <li>• Anti-terrorism, Crime and Security Act 2001</li> <li>• Proceeds of Crime Act 2002</li> <li>• The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017</li> <li>• Criminal Finances Act 2017</li> <li>• The Money Laundering and Terrorist Financing (amendment) Regulations 2019</li> </ul>
<a href="#"><u>NCA</u></a>	National Crime Agency - leads the UK's fight to cut serious and organised crime, protecting the public by targeting and pursuing those criminals who pose the greatest risk to the UK.
<b>Principal Offences</b>	The three main money laundering offences, as stated in the Proceeds of Crime Act 2002 (S327, 328, 329): Concealing; Arranging; Acquisition, use and possession.
<b>PSC register</b>	UK companies (except listed companies and limited liability partnerships) need to declare this information when issuing their annual confirmation statement to Companies House. This information will form a central public register of people with significant control, which is free to access.
<b>Person of Significant Control (PSC register)</b>	Someone that holds more than 25% of shares or voting rights in a company, has the right to appoint or remove the majority of the board of directors or otherwise exercises significant influence or control.

**Customer Due Diligence Form – Private individual**

To be completed in accordance with the ‘Due Diligence and Know your Customer Procedure’

Name of person reviewing customer:	
Telephone number:	
Customer name:	
Customer address:	
Customer contact details:	
Type of customer:	

Evidence of Identity Obtained (verified photocopies attached) and Summary of Due Diligence Checks Undertaken (refer to Customer Due Diligence and Know Your Customer Procedure):

*refer to Customer Due Diligence and Know Your Customer Procedure*

Summary of transactions:

*Purpose, nature, value etc.*

**Operational Manager – Consideration to Proceed**

Can the Council proceed with the transaction? Yes / No

Name: \_\_\_\_\_ Signed: \_\_\_\_\_ Date: \_\_\_\_\_

**If you have concerns about the customer verification, you must make a disclosure to the MLRO.**

<b>OM Approved</b>		<b>OR</b>	<b>OM Referred to MLRO</b>	
--------------------	--	-----------	----------------------------	--

Date referred to MLRO: \_\_\_\_\_

*OM approval /disclosure comments required.*

**A copy of this form must be submitted to the MLRO in every case - OM approval or MLRO disclosure.**

✉ [Fraud@cardiff.gov.uk](mailto:Fraud@cardiff.gov.uk)

☎ 029 2087 2284

**Money Laundering Reporting Officer (MLRO) - Consideration to proceed**

**To be completed by the Money Laundering Reporting Officer**

Consideration of Due Diligence Checks Undertaken and Determination:

--

Can the Council proceed with the transaction?      Yes / No

Name: \_\_\_\_\_ Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Actions taken by the MLRO:	
----------------------------	--

**Customer Due Diligence Form – Business**

To be completed in accordance with the 'Due Diligence and Know your Customer Procedure'

Name of person reviewing customer:	
Telephone number:	
Business name:	
Registered address:	
Company contact details:	
Companies House Registration Number	
Type of business:	

Who are the company Directors? – are there any beneficial owners? (I.e. any person/company who owns more than 25% of the company in question)

Date of first contact with Company: \_\_\_\_\_

Nature of Transaction: \_\_\_\_\_

Summary of Due Diligence checks undertaken:

*refer to Customer Due Diligence and Know Your Customer Procedure*

**Operational Manager – Consideration to Proceed**

Can the Council proceed with the transaction?      Yes / No

Name: \_\_\_\_\_ Signed: \_\_\_\_\_ Date: \_\_\_\_\_

**If you have concerns about the customer verification, you must make a disclosure to the MLRO.**

OM Approved	
-------------	--

**OR**

OM Referred to MLRO	
---------------------	--

Date referred to MLRO:	
------------------------	--

<i>OM approval / disclosure comments required.</i>
--

**A copy of this form must be submitted to the MLRO in every case - OM approval or MLRO disclosure.**

✉ [Fraud@cardiff.gov.uk](mailto:Fraud@cardiff.gov.uk)

☎ 029 2087 2284

### **Money Laundering Reporting Officer (MLRO) - Consideration to proceed**

#### **To be completed by the Money Laundering Reporting Officer**

Consideration of Due Diligence Checks Undertaken and Determination:

--

Can the Council proceed with the transaction?      Yes / No

Name: \_\_\_\_\_ Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Actions taken by the MLRO:	
----------------------------	--

## Money Laundering Disclosure Form

This form should be used to report **suspicious activity**. Certain information will be required in order for a report to be accepted by the National Crime Agency.

Person making the disclosure: \_\_\_\_\_

Contact details: \_\_\_\_\_

### Main subject of suspicious activity

Please provide the following information as appropriate / available:

- Full name, address, date of birth, employer/employment, bank details of the individual
- Full name, address, company number, vat number, bank details, type of business for all companies thought to be involved
- If identification has been sighted, state the type and relevant reference numbers (e.g. passport number)
- Any further information to identify persons involved

- Information as above in respect of relevant associates\* of the individual
- Details of the connection between the main subject and the associate subject (reason for association)

\* an associate person or company is one that is linked to the main person/company in some direct way and is involved in the suspicious activity.

- Details of your involvement/transactions with the individual / business (date, amount, debit or credit, cash etc.)

- Why are you suspicious about this activity?

Have you discussed your concerns with anyone else?      Yes / No    If yes, elaborate:

Have you taken any action or done any further Due Diligence?      Yes / No    If yes, elaborate:

Please email the completed form to [Fraud@cardiff.gov.uk](mailto:Fraud@cardiff.gov.uk)

## Due Diligence and Know Your Customer Procedure

### 1. Introduction

- 1.1 This procedure aims to protect the Council from fraud and money laundering activities and enables the Council to meet the legal requirements associated with the Money Laundering Regulations, in a way that is proportionate to the Council's risk of contravening the legislation.
- 1.2 Obtaining the Due Diligence and Know Your Customer information is only the first step. You must ensure that you review the information and ask appropriate questions or request additional information if necessary. If there are any doubts about the legitimacy of the identity or business relationship being established, then appropriate advice should be sought from your Line Manager or the MLRO as appropriate. If you have concerns about money laundering or fraud, need to make the appropriate disclosure under the Anti-Money Laundering Policy, the Counter-Fraud and Corruption Strategy and the Fraud, Bribery and Corruption Policy.

### 2. Scope of the Procedure

- 2.1 This procedure applies to:
  - All Council employees (permanent, temporary or casual) and Agency Staff
  - Elected Members
  - Consultants undertaking Council work, Contractors working for the Council, and Partners
  - Suppliers and those providing services under contract with the Council
  - Volunteers
  - Anyone carrying out work for, or on behalf of, the Council
- 2.2 Failure by any member of staff to comply with this procedure may lead to disciplinary action being taken against them.

### 3. What is Due Diligence and Know Your Customer?

- 3.1 Criminals often seek to mask their true identity by using complex and opaque ownership structures. The purpose of customer due diligence is to know and understand a client's identity and business activities so that any money laundering risks can be properly managed. Effective customer due diligence is therefore, a key part of anti-money laundering defences.
- 3.2 By knowing the identity of a client, including matters of business ownership and control, the Council not only fulfils its legal and regulatory requirements, it equips itself to make informed decisions about the client's standing and acceptability.
- 3.3 The required components are:
  - a) **Identifying the client** (i.e., knowing who the client is) and then verifying their identity (i.e., demonstrating that they are who they claim to be) by obtaining documents or other information from independent and reliable sources;
  - b) **Identifying beneficial owner(s)** so that the ownership and control structure can be understood and the identities of any individuals who are the owners or controllers can be

known and, on a risk sensitive basis, reasonable measures should be taken to verify their identity; and

c) **Gathering information on the intended purpose and nature of the business relationship.**

3.4 If you have doubts about a customer's identity, you must stop dealing with them until you are sure.

**4. When to apply Customer Due Diligence measures**

4.1 Before establishing a *client* relationship or accepting an engagement, the Council must have controls in place to address the risks arising from it.

Land or property sale

4.2 When you establish a business relationship, with a customer or another party in a land or property sale.

New business relationship

4.3 When you establish a new business relationship (formal or informal) you need to obtain information on:

- the purpose of the relationship
- the intended nature of the relationship - for example where funds will come from, the purpose of transactions, and so on

The type of information that you need to obtain may include:

- details of your customer's business or employment
- the source and origin of funds that your customer will be using in the relationship
- copies of recent and current financial statements
- details of the relationships between signatories and any underlying beneficial owners
- the expected level and type of activity that will take place in your relationship

Changing circumstances

4.4 We are required to keep up-to-date information on our customers so that we can:

- amend our risk assessment of a particular customer if their circumstances change
- carry out further due diligence measures if necessary

Changes of circumstance may include:

- a big change in the level or type of business activity
- a change in the ownership structure of a business

Occasional transactions

4.5 The Council should carry out customer due diligence measures when occasional transactions are carried out. These are transactions that are not carried out within an ongoing business relationship where the value is £10,000 or more. This applies whether it is a single transaction or linked transactions.

4.6 Linked transactions are individual transactions of less than £10,000 that have been deliberately broken down into separate, smaller transactions to avoid customer due diligence checks. Some issues to consider are:

- a number of payments have been made by the same customer in a short period of time
- It is possible that a number of customers have carried out transactions on behalf of the same person.

## 5. Record keeping requirements

5.1 All records created as part of the Customer Due Diligence process, including any non-engagement documents relating to the *client* relationship and ongoing monitoring of it, must be retained for five years after the relationship ends.

5.2 All records related to an *occasional transaction* must be retained for five years after the transaction is completed. A disengagement letter could provide documentary evidence that a business relationship has terminated, as could other forms of communication such as an unambiguous email making it clear that the *business* does not wish to engage or is ceasing to act.

5.3 Whenever a 'Customer Due Diligence Form' is completed, a copy must be provided to the MLRO, for monitoring purposes, and to respond to disclosures via [Fraud@cardiff.gov.uk](mailto:Fraud@cardiff.gov.uk).

5.4 All completed Customer Due Diligence Forms must be retained including all customer due diligence measures that are carried out.

## 6. Reporting

6.1 The nominated Money Laundering Reporting Officer and should be notified of any activity or suspicion of money laundering.

✉ [fraud@cardiff.gov.uk](mailto:fraud@cardiff.gov.uk)

☎ 029 2087 2284

**Individual Verification**

Entity type	Evidence required	Notes
<p><b>Individual (UK or EU resident)</b></p>	<p><b><i>Proof of name and identity</i></b>                      The original (or if that is not available, a certified copy) of one of:</p> <ul style="list-style-type: none"> <li>• Signed passport.</li> <li>• National identity card with photograph.</li> <li>• UK or EU driving licence (with photograph)</li> <li>• A verifiable government document containing a photograph of the client.</li> </ul> <p><b>AND</b></p> <p><b><i>Proof of address</i></b>                      The original (or if that is not available a certified copy) of one of:</p> <ul style="list-style-type: none"> <li>• Current council tax or utility bill.</li> <li>• Current bank or building society statement containing current address.</li> <li>• Current mortgage statement or rent book.</li> <li>• Driving licence (if not used to confirm identity).</li> </ul>	<p>In the event any of the original documents cannot be obtained, other original documentation, not listed here or an entry on the electoral register may be acceptable, but you will need the consent of the MRLO to accept any documents not listed in this table.</p>
<p><b>Individual (non-UK resident)</b></p>	<p><b><i>Proof of name and identity</i></b>                      The original (or if that is not available a certified copy) of one of:</p> <ul style="list-style-type: none"> <li>• Signed passport</li> <li>• National identity card (with photograph).</li> </ul> <p><b>AND</b></p> <p><b><i>Proof of address</i></b>                      The original (or if that is not available a certified copy) of one of:</p> <ul style="list-style-type: none"> <li>• Current utility or tax bill confirming home address.</li> <li>• Current rent or mortgage statement confirming the home address.</li> <li>• Address confirmation from an official overseas source.</li> <li>• A reputable directory confirming home or work address.</li> </ul>	

**Business Verification**

Entity type	Evidence required	Notes
<p><b>Individual professionals</b></p>	<p>You must verify the identity of the individual professional in the same way as other individuals.</p>	<p>If an individual is acting in the course of his/her business and is registered in the appropriate professional directory (such as an English solicitor on the Solicitors Regulation Authority roll who can be found on the Law Society’s website) with a current business address you do not need to confirm the home address of the individual.</p>
<p><b>All UK government and public authorities</b> <i>(including Local Authorities)</i></p>	<p>All that is required is confirmation that the Agency or Public Authority exists from an official government website.</p>	<p>If the person we are dealing with is not listed as a director or officer of the Agency or Authority then you must satisfy yourself that the person does work within the department of which the relevant executive officer is listed. Confirmation on official headed notepaper/letterhead is sufficient.</p>
<p><b>Arm’s Length Management Organisations (ALMO’s)</b></p>	<p>Obtain name, company name, registered office, or if different, principle place of business.</p> <p>Obtain copies of:</p> <ul style="list-style-type: none"> <li>• Certificate of Incorporation.</li> <li>• Articles of Association showing sole ownership of the company by the Council.</li> </ul> <p>You must also verify the identity of the officer with whom you are dealing in relation to the transaction. You should do this in the same way as verifying the identity of an individual.</p>	<p>You must take all reasonable steps to identify the law to which the entity and its constitution is subject, full names of the board of directors, or if there is no board the senior management and the senior person responsible for the operation of the entity.</p>

Page 24 of 31

Entity type	Evidence required	Notes
<b>UK registered providers (RPs)</b>	<p>Obtain name, company name, registered office, or if different, principle place of business.</p> <p>You must obtain copies of:</p> <ul style="list-style-type: none"> <li>• The registration entry at Companies House or the FCA.</li> <li>• The audited accounts listing the directors and chief officers.</li> </ul> <p>You must also verify the identity of the officer with whom you are dealing in relation to the transaction. You should do this in the same way as verifying the identity of individual.</p> <p>Any discrepancies should be reported to Companies House.</p>	<p>Please note that if the entity is a Registered Provider (RP) and a registered charity, you should follow the RP requirements.</p>
<b>Pre-registration RPs</b>	<p>Obtain name, company name, registered office, or if different, principle place of business.</p> <p>You must obtain copies of:</p> <ul style="list-style-type: none"> <li>• The company formation documents or a copy of the RPs HCA, Companies House or FCA registration.</li> </ul> <p>You must also verify the identity of the officer with whom you are dealing in relation to the transaction. You should do this in the same way as verifying the identity of an individual.</p> <p>Any discrepancies should be reported to Companies House.</p>	<p>Please note that if the entity is a pre-registration RP and a registered charity, you should follow the RP requirements AND the charity requirements.</p>

Entity type	Evidence required	Notes
<p><b>Small charities</b></p> <p><i>(with an annual income of less than £500,000)</i></p>	<p>Obtain name, company name, registered office, or if different, principle place of business.</p> <p>You must obtain copies of:</p> <ul style="list-style-type: none"> <li>• Certificate of Incorporation.</li> <li>• The constitutional documents.</li> <li>• The latest accounts.</li> </ul> <p>You must also verify the identity of the officer with whom you are dealing in relation to the transaction. You should do this in the same way as verifying the identity of an individual.</p>	<p>Please note that if the entity is a Registered Provider and a registered charity, you should follow the RP requirements.</p>
<p><b>Large charities</b></p> <p><i>(with an annual income of £500,000 or more)</i></p>	<p>Obtain name, company name, registered office, or if different, principle place of business.</p> <p>You must obtain copies of:</p> <ul style="list-style-type: none"> <li>• Extract from the Charity Commission website showing the charity registration number and place of business.</li> <li>• The latest accounts (summary is acceptable).</li> </ul> <p>You must also verify the identity of the officer with whom you are dealing in relation to the transaction. You should do this in the same way as verifying the identity of an individual.</p>	<p>Please note that if the entity is Registered Provider and a registered charity, you should follow the RP requirements.</p>
<p><b>Partnerships</b></p>	<p>You must verify:</p> <ul style="list-style-type: none"> <li>• the identity of the partner with whom you are dealing in relation to the transaction plus one other partner plus any other partner who owns or controls 25% more of the partnership in terms of capital, voting rights or profits.</li> </ul> <p>You should do this in the same way as verifying the identity of individual.</p>	<p>If the partnership is made up of regulated professionals (solicitors, accountants, estate agents, tax advisors and insolvency practitioners) confirmation of its existence and current business address from the relevant professional directory or reputable professional directory is sufficient.</p>

Entity type	Evidence required	Notes
<p><b>Trusts</b></p>	<p>You must verify the identity of at least two of the trustees, including one with whom you are dealing in relation to the transaction. The identification requirements you need will depend on the nature of the trustee, so for example if the trustee is a UK private company, follow the requirements in this table for UK private companies, and if the trustee is an individual, follow the requirements in this table for individuals.</p> <p>You must check and understand the documents establishing the Trust. This is likely to involve a request for a Trust structure chart, and a certified copy of the Trust deed.</p> <p>As well as verifying the identity of two trustees in the same way you would verify the identity of an individual (you must also verify the identity of the beneficiaries of the trust, its settlor and any individual having control over it (e.g. a protector) again, in the same way that you would verify the identity of an individual.</p> <p>Any discrepancies should be reported to Companies House.</p>	
<p><b>Companies listed on a recognised UK stock exchange</b></p> <p><i>(in practice is any company listed on the Main List of the London Stock Exchange (LSE))</i></p>	<p>Obtain name, company name, registered office, or if different, principle place of business.</p> <p>You must obtain copies of:</p> <ul style="list-style-type: none"> <li>• Certificate of Incorporation.</li> </ul> <p>Evidence of the UK listing which can be found in most UK newspapers or on the relevant exchange website.</p>	

Entity type	Evidence required	Notes
<p><b>Majority owned subsidiaries of companies listed on a regulated market in the UK</b></p> <p><i>(i.e. listed on the Main List of the LSE)</i></p>	<ul style="list-style-type: none"> <li>• Obtain the name, company number, registered office, or if different, principle place of business.</li> <li>• Identify the parent company listed in the UK (see above requirements): Companies registered on a recognised UK Stock Exchange.</li> <li>• Obtain confirmation of the parent/subsidiary relationship such as the last filed annual report or a note from the parent’s last audited accounts.</li> </ul> <p>Any discrepancies should be reported to Companies House.</p>	<p>If the company structure is complex, ask to see a corporate structure chart (you need to ask applicant to provide this).</p> <p>Once you receive the structure chart you should check it against publicly available information at Companies House (you can do this by searching the company names at Companies House Online) and / or using an Online Check. If it is not possible to identify any of the group entities using these sources then this must be discussed with the MLRO.</p>
<p><b>Private and unlisted public UK companies – FCA authorised</b></p>	<ul style="list-style-type: none"> <li>• Obtain the name, company number, registered office, or if different, principle place of business.</li> <li>• A copy of the FCA on-line register showing the company and relevant directors are FCA authorised.</li> </ul> <p>You must also:</p> <ul style="list-style-type: none"> <li>• Verify the identity of the officer with whom you are dealing in relation to the transaction. You should do this in the same way as verifying the identity of individual.</li> <li>• Take all reasonable steps to identify the law to which the entity and its constitution is subject , full names of the board of directors, or if there is no board the senior management and the senior person responsible for the operation of the entity.</li> </ul>	

Entity type	Evidence required	Notes
<p><b>Private and unlisted public UK companies – non FCA authorised</b></p>	<p>You must obtain:</p> <ul style="list-style-type: none"> <li>• Certificate of Incorporation</li> <li>• A current Companies House search</li> </ul> <p>You must also:</p> <ul style="list-style-type: none"> <li>• Verify the identity of the officer with whom you are dealing in relation to the transaction. You should do this in the same way as verifying the identity of an individual.</li> <li>• Identify any ultimate beneficial owner, being a living individual who owns 25% or more of the shares in the company or otherwise controls 25% or more of the company. You should do this in the same way as verifying the identity of an individual.</li> </ul> <p>Any discrepancies should be reported to Companies House.</p>	<p>If the company structure is complex, ask to see a corporate structure chart and check it to publicly available information on Companies House.</p>
<p><b>AIM companies</b></p> <p><i>(AIM is the UK Alternative Investment Market and is a sub-market of the London Stock Exchange. AIM companies are generally smaller than FTSE or LSE companies)</i></p>	<p>Obtain the name, company number, registered office, or if different, principle place of business.</p> <p>You must obtain:</p> <ul style="list-style-type: none"> <li>• Certificate of Incorporation.</li> <li>• A current Companies House search. To do this you need to search the company name at Companies House Online to confirm the company remains active and registered.</li> </ul> <p>You must also:</p> <ul style="list-style-type: none"> <li>• Verify the identity of the officer with whom you are dealing in relation to the transaction. You should do this in the same way as verifying the identity of an individual.</li> <li>• Identify any ultimate beneficial owner (UBO) being a living individual who owns 25% or more of the shares in the company or otherwise controls 25% or more of the company.</li> <li>• Take all reasonable steps to identify the law to which the entity and its constitution is subject, full names of the board of directors, or if there is no board the senior management and the senior person responsible for the operation of the entity.</li> </ul> <p>Any discrepancies should be reported to Companies House.</p>	<p>If the company structure is complex, ask to see a corporate structure chart (you need to ask the applicant to provide this).</p> <p>Once you receive the structure chart you should check it against publicly available information at Companies House (you can do this by searching the company names at Companies House Online) and /or using an Online Check. If it is not possible to identify any of the group entities using these sources then this must be discussed with the MLRO.</p> <p>Once you have checked the structure chart, you need to verify the identity of all of the UBOs – i.e. the bottom of the ownership chain.</p>



Entity type	Evidence required	Notes
<p><b>Unlisted and private overseas companies</b></p>	<p>Obtain the name, company number, registered office, or if different, principle place of business.</p> <p>You must obtain:</p> <ul style="list-style-type: none"> <li>• Official evidence of a registered address.</li> <li>• Copy of documents required by law to form the company (and details of any change of name).</li> <li>• Certificate of 'good standing' from a lawyer. This needs to state that the company exists as a legal entity and has complied with all administrative requirements relating to its registration (including the payment of any government dues).</li> <li>• Copy of the register of shareholders/members and directors.</li> <li>• Confirmation from the company that the director we are dealing with is authorised on behalf of the company. This should be a written confirmation on company letterhead or a suitable board minute.</li> </ul> <p>You must also</p> <ul style="list-style-type: none"> <li>• verify the identity of the officer with whom you are dealing in relation to the transaction.</li> <li>• identify any ultimate beneficial owner being a living individual who owns 25% or more of the shares in the company or otherwise controls 25% or more of the company</li> <li>• take all reasonable steps to identify the law to which the entity and its constitution is subject, full names of the board of directors, or if there is no board the senior management and the senior person responsible for the operation of the entity.</li> </ul>	

This page is intentionally left blank

**CARDIFF COUNCIL**  
**Equality Impact Assessment**  
**Corporate Assessment Template**



<b>Policy/Strategy/Project/Procedure/Service/Function Title:</b> Anti-Money Laundering Policy
<b>New/Existing/Updating/Amending:</b> Update to replace the Money Laundering Policy and Procedure

<b>Who is responsible for developing and implementing the Policy/Strategy/Project/Procedure/Service/Function?</b>	
Name: Chris Pyke	Job Title: Audit Manager, Operational Manager
Service Team: Internal Audit	Service Area: Resources
Assessment Date: 05/02/2020	

**1. What are the objectives of the Policy/Strategy/Project/ Procedure/ Service/Function?**

<p>The policy aims to protect the Council from fraud and money laundering activities and enables the Council to meet the legal requirements associated with Money Laundering Regulations, in a way that is proportionate to the Council's risk of contravening the legislation.</p> <p>The Council's reputation is underpinned by ethical behaviour, financial probity and honesty. In carrying out its functions and responsibilities, the Council seeks to promote a culture of openness and fairness. Any cases of fraud, bribery, corruption or other dishonesty could adversely affect the Council's reputation, and put its ability to achieve its policies and objectives at risk.</p> <p>This policy is designed to ensure adequate safeguards and reporting arrangements, to prevent the Council from being used by third parties for money laundering.</p>
--

**2. Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]**

<p>Money laundering is the process of making money generated by a criminal activity, such as drug dealing or theft appear to have come from a legitimate source. The policy has been developed in line with associated legislation and regulations, namely:</p> <ul style="list-style-type: none"> <li>• Terrorism Act 2000</li> <li>• Anti-terrorism, Crime and Security Act 2001</li> <li>• Proceeds of Crime Act 2002</li> </ul>
---

**CARDIFF COUNCIL**  
**Equality Impact Assessment**  
**Corporate Assessment Template**

- The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
- The Money Laundering and Terrorist Financing (amendment) Regulations 2019

Criminals often seek to mask their identity by using complex and opaque ownership structures. The policy includes customer due diligence requirements to support the Council to know and understand a client's identity and business activities so that any money laundering risks can be properly managed. Effective customer due diligence is therefore, a key part of anti-money laundering defenses.

The level of due diligence required in the policy for money laundering purposes is to be achieved through a risk-based approach, through which the Council will be satisfied that we sufficiently identify:

- the identity of the client
- the beneficial owner
- Information on the intended purpose of the business relationship.

The customer verification requirements are included within the policy for individuals and businesses. Any impact on particular service users will be proportionate the level of risk associated in transacting with them, as defined in the due diligence and know your customer procedure included within the policy.

### 3 Assess Impact on the Protected Characteristics

#### 3.1 Age

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative/]** on younger/older people?

	Yes	No	N/A
Up to 18 years			X
18 - 65 years			X
Over 65 years			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the policy will have a differential impact on age, but general actions have been set out to mitigate potential associated risks.

**What action(s) can you take to address the differential impact?**

Please see general actions within section 5 - comments.

**CARDIFF COUNCIL**  
**Equality Impact Assessment**  
**Corporate Assessment Template**

**3.2 Disability**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment			X
Physical Impairment			X
Visual Impairment			X
Learning Disability			X
Long-Standing Illness or Health Condition			X
Mental Health			X
Substance Misuse			X
Other			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the policy will have a differential impact on disability, but general actions have been set out to mitigate potential associated risks.

**What action(s) can you take to address the differential impact?**

Please see general actions within section 5 - comments.

**3.3 Gender Reassignment**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
<b>Transgender People</b> (People who are proposing to undergo, are undergoing, or have undergone a process [or part of a process] to reassign their sex by changing physiological or other attributes of sex)			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the policy will have a differential impact on gender reassignment, but general actions have been set out to mitigate potential associated risks.

**What action(s) can you take to address the differential impact?**

Please see general actions within section 5 - comments.

**3.4. Marriage and Civil Partnership**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on marriage and civil partnership?

**CARDIFF COUNCIL**  
**Equality Impact Assessment**  
**Corporate Assessment Template**

	Yes	No	N/A
Marriage			X
Civil Partnership			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the policy will have a differential impact on marriage and civil partnership, but general actions have been set out to mitigate potential associated risks.

**What action(s) can you take to address the differential impact?**

Please see general actions within section 5 - comments.

### 3.5 Pregnancy and Maternity

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy			X
Maternity			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the policy will have a differential impact on pregnancy and maternity, but general actions have been set out to mitigate potential associated risks.

**What action(s) can you take to address the differential impact?**

Please see general actions within section 5 - comments.

### 3.6 Race

Will this Policy/Strategy/Project//Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White			X
Mixed / Multiple Ethnic Groups			X
Asian / Asian British			X
Black / African / Caribbean / Black British			X
Other Ethnic Groups			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the policy will have a differential impact on race, but general actions have been set out to mitigate potential associated risks.

**CARDIFF COUNCIL**  
**Equality Impact Assessment**  
**Corporate Assessment Template**

<b>What action(s) can you take to address the differential impact?</b>
--

Please see general actions within section 5 - comments.
---

**3.7 Religion, Belief or Non-Belief**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist			X
Christian			X
Hindu			X
Humanist			X
Jewish			X
Muslim			X
Sikh			X
Other			X

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
--

It is not anticipated that the policy will have a differential impact on religion, belief or non-belief, but general actions have been set out to mitigate potential associated risks.
--

<b>What action(s) can you take to address the differential impact?</b>
--

Please see general actions within section 5 - comments.
---

**3.8 Sex**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on men and/or women?

	Yes	No	N/A
Men			X
Women			X

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
--

It is not anticipated that the policy will have a differential impact on sex, but general actions have been set out to mitigate potential associated risks.
---

<b>What action(s) can you take to address the differential impact?</b>
--

Please see general actions within section 5 - comments.
---

**3.9 Sexual Orientation**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

## Appendix B

### CARDIFF COUNCIL Equality Impact Assessment Corporate Assessment Template

	Yes	No	N/A
Bisexual			X
Gay Men			X
Gay Women/Lesbians			X
Heterosexual/Straight			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the policy will have a differential impact on sexual orientation, but general actions have been set out to mitigate potential associated risks.

**What action(s) can you take to address the differential impact?**

Please see general actions within section 5 - comments.

#### 3.10 Welsh Language

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on Welsh Language?

	Yes	No	N/A
Welsh Language			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the policy will have a differential impact on welsh language, but general actions have been set out to mitigate potential associated risks.

**What action(s) can you take to address the differential impact?**

Please see general actions within section 5 - comments.

#### 4. Consultation and Engagement

What arrangements have been made to consult/engage with the various Equalities Groups?

A copy of the Anti-Money Laundering Policy and Equality Impact Assessment (EIA) was shared with the Equality Team.

A process of consultation and engagement will take place with Trade Unions.

#### 5. Summary of Actions [Listed in the Sections above]

Groups	Actions
Age	Not applicable
Disability	Not applicable
Gender Reassignment	Not applicable
Marriage & Civil Partnership	Not applicable
Pregnancy & Maternity	Not applicable

4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 6
---------	---------	--------	-----------------------------	--------------------------	--------

## Appendix B

### CARDIFF COUNCIL Equality Impact Assessment Corporate Assessment Template

Race	Not applicable
Religion/Belief	Not applicable
Sex	Not applicable
Sexual Orientation	Not applicable
Welsh Language	Not applicable
Generic Over-Arching [applicable to all the above groups]	Not applicable

<b>Comment</b>	<p>This policy refresh relates to financial processes and addresses legislative changes in respect of money laundering / terrorist financing.</p> <p>There will be no adverse impact on any equality groups or protected characteristics, as the Anti-Money Laundering Policy supports the Council in its duty to protect public funds from illegal activity and to comply with legislation. In fact, deterrence of fraud can be of general benefit to all groups. Robust processes on deterring fraud will reinforce the integrity of the Council.</p> <p>An anti-money laundering eLearning module will be produced to provide training to key staff within the Council. Advice will be sought from the Equality Team, so that suitable guidance in respect reducing any potential negative impact on any of the equality groups is incorporated.</p>
----------------	---

#### 6. Further Action

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

#### 7. Authorisation

The Template should be completed by the Lead Officer of the identified Policy/Strategy/Project/Function and approved by the appropriate Manager in each Service Area.

Completed By : David Hexter	Date: 5 <sup>th</sup> February 2020
Designation: Group Auditor (Investigations)	
Approved By: Chris Pyke	
Designation: Audit Manager, Operational Manager	
Service Area:	Resources

- 7.1 On completion of this Assessment, please ensure that the Form is posted on your Directorate's Page on CIS - *Council Wide/Management Systems/Equality Impact Assessments* - so that there is a record of all assessments undertaken in the Council.

4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 7
---------	---------	--------	-----------------------------	--------------------------	--------

**CARDIFF COUNCIL**  
**Equality Impact Assessment**  
**Corporate Assessment Template**

For further information or assistance, please contact the Citizen Focus Team on 029 2087 2536 / 3262 or email [equalityteam@cardiff.gov.uk](mailto:equalityteam@cardiff.gov.uk)

**CORPORATE RISK MANAGEMENT - QUARTER TWO 2020/21**

**FINANCE, MODERNISATION AND PERFORMANCE  
(COUNCILLOR WEAVER)**

**AGENDA ITEM: 8**

**Reason for this Report**

1. To update Cabinet on the risk management position at quarter two 2020/21 and to highlight any changes from the quarter four 2019/20 report.

**Background**

2. Cabinet receives a risk management update on a biannual basis with the opportunity to make comments.
3. Each Directorate holds a Directorate Risk Register (DRR) and the Senior Management Team (SMT) collectively own a Corporate Risk Register (CRR). The CRR records the main risks to the delivery of corporate objectives and priorities, whilst the DRRs record the key risks to the delivery of Directorate functions and priorities.
4. A risk escalation process is in place, whereby each Director is required to take ownership of all residual (current) risks rated as 'red/amber' and above on their DRR and, at a minimum, to escalate all 'red' residual risks to SMT for collective ownership and review.
5. This reporting process allows SMT to determine if any changes are required to the CRR each quarter. The remaining escalated risks continue to be held on DRRs and are reviewed by SMT each quarter until it is agreed that mitigation is sufficient for risk ownership to transfer back to the Directorate.

**Issues**

6. Each Director has worked with their Risk Champion(s) to undertake their quarter two risk management review. The Risk Management Team has also provided advice and guidance on the measurement and reporting of risks. The quarter two risk assessments are presented on the Corporate Risk Register Summary Snapshot (Appendix A) and the Detailed Corporate Risk Register (Appendix B).

7. The Risk Management Review process has two tiers (Directorate and Corporate) and the actions at each for quarter two are detailed as follows.

### **Directorate Risks**

8. At the quarter two position, 296 risks were reported from DRRs. All escalated risks and requests for de-escalation were discussed and approved in SMT on 29 October 2020.
9. It was agreed that eight directorate risks would be carried forward as SMT escalated risks at quarter two. Also included in the figure of 296 directorate risks are 82 Covid-19 specific risks that have been identified and are being managed within directorates as at the end of quarter two.

<b>Directorate</b>	<b>Directorate Risks</b>	<b>Risks at SMT Escalation Point</b>	<b>Covid-19 Specific Risks</b>
Economic Development	32	2	12
Education	23	0	9
Governance & Legal Services	14	1 (Shared)	6
Housing & Communities	62	2	26
Performance & Partnerships	2	0	0
Planning, Transport & Environment	29	0	3
Recycling & Waste	1	0	0
Resources	92	1	8
Social Services	41	3 (1 Shared)	18
<b>Total</b>	<b>296</b>	<b>8</b>	<b>82</b>

### **Corporate Risks**

10. SMT collectively reviewed the escalated directorate risks and corporate risk updates at the end of quarter two.
11. In considering the Corporate Risk register, the Senior Management Team considered the appropriateness of the approach in respect to Workforce Planning and Capital Ambition Delivery. The Senior Management Team considered that both of these risks were being managed by each Directorate and, being part of Directorate rather than Corporate Risk registers allowed them to focus on the key risks and challenges for these areas in the relevant detail. The established Risk Management process also allows any directorate risk to be escalated into Senior Management where it is determined that a corporate response is required in terms of action or resources. An example of this has been the continued escalation of the Social Care Workforce Risk by the directorate that is currently being managed and monitored within the directorate with significant support from corporate functions.
12. Capital Ambition was refreshed in January 2020, at the mid-point of the municipal cycle, in recognition of the progress made and the emergence of new delivery priorities. As part of this process, the previously separate

reporting arrangements for delivering certain corporate priorities were brought into the Directorate Performance Management Framework. This formed part of the Council's response to the WAO review of the Council's change management arrangements (the Delivering Capital Ambition Programme) which identified the need for greater alignment between the Corporate Plan Framework and the performance reporting arrangements. This integration ensured the additional resources allocated to address Corporate Priorities are managed through one Planning and Improvement Framework.

13. In addition, it is proposed that the current corporate risk titled Schools Organisation Programme (Band B) is broadened to consider new asset infrastructure across the Council. This will ensure that there is a corporate view on the risks associated with all infrastructure projects. This work is currently being undertaken and will be reported to the Audit Committee in the future.

### **Coronavirus (COVID-19)**

14. The impact of Covid-19 on existing risks has been considered as part of quarter two reporting arrangements. Directorates have also considered Covid-specific risks as set out in the previous table.
15. The speed and uncertainty of events has led to the need for the risks in relation to Covid-19 to be monitored on a more frequent basis. The formal Directorate Risk Registers continue to be updated on a quarterly basis and are reviewed in order to ensure that the risk and the associated impacts and likelihood remain appropriate. As reported previously, the Senior Management Team met on a daily basis at the early onset of the pandemic and this continued until July. Whilst the meetings reduced to three days a week during the period July to September, there remained the opportunity for any issues to be raised at this meeting with the emphasis on those matters that required escalation in terms of capacity, support or speed of response. Since October, as events have become more concerning these meetings have returned to a daily basis.
16. The Directorate Risk Registers have collected a series of risks that are related to Covid-19 and the challenges in delivering services in the current environment, which is subject to various incidences of infection. Where the directorates have identified interdependencies with other services of the Council then these are reported to the Senior Management Team. The Council's response to the pandemic and its risk management is not restricted to delivering its own services, and there are clear links with Welsh Government and Health partners.
17. The Senior Management Team has kept an oversight on preparations and actions of directorates in order to ensure that there is a level of business continuity and resilience built into service delivery plans. This includes identifying the steps taken to embed working practices that can continue even if the pandemic conditions return to April activity levels. This robustness is supported by the existing Emergency Management processes in place and does place reliance on an escalation mechanism.

## **UK's Exit of the European Union**

18. The UK left the European Union on 31<sup>st</sup> January 2020. It remains in the single market and customs union until the end of the year as part of transition arrangements. Negotiations continue to take place in order to secure the future relationship between the UK and the EU. The UK government's position remains not to extend the transition period beyond 31<sup>st</sup> December 2020.

## **Reason for Recommendation**

19. To enable the Cabinet to monitor risk management activity, and consider the Risk Management Review – quarter two 2020/21.

## **Legal Implications**

20. There are no direct legal implications arising from this report. However, one of the benefits of identifying risk is that mitigation measures may be taken, if appropriate, and consequently successful claims against the Council may be avoided altogether, or reduced.

## **Financial Implications**

21. There are no direct financial implications arising from this report. The Corporate Risk register will be used to guide the Internal Audit Plan and the Council's resource planning processes and forms an important part of the governance arrangements for the Council.

## **HR Implications**

22. There are no direct HR implications arising from this report. However HR will continue to work with services in areas of risk that have workforce implications to ensure that appropriate support is provided to assist in the mitigation of these.

## **Property Implications**

23. There are no particular issues identified in this report from a property implications perspective. The Council's Strategic Estates department will continue to engage in respect of any matters pertaining to the Corporate Risk register as part of the governance arrangements for the Council's estate.

## **RECOMMENDATIONS**

Cabinet is recommended to note the content of the Corporate Risk Register.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>CHRISTOPHER LEE</b> Corporate Director Resources
	11 December 2020

*The following appendices are attached:*

**Appendix A** - Corporate Risk Register Summary Snapshot – Q2 2020/21

**Appendix B** - Detailed Corporate Risk Register – Q2 2020/21

This page is intentionally left blank

# Corporate Risk Register Summary Snapshot Quarter 2 2020/21

Appendix A

Number of Risks by Inherent Risk Rating

Likelihood	A	A1 11	A2 2	A3	A4
	B	B1 6	B2 4	B3	B4
	C	C1	C2	C3	C4
	D	D1	D2	D3	D4
	E	E1	E2	E3	E4
		1	2	3	4
		Impact			

Number of Risks by Residual Risk Rating

Likelihood	A	A1 1	A2	A3	A4
	B	B1 1	B2 6	B3 1	B4
	C	C1 2	C2 7	C3	C4
	D	D1 3	D2 2	D3	D4
	E	E1	E2	E3	E4
		1	2	3	4
		Impact			

Number of Risks by Target Risk Rating

Likelihood	A	A1	A2	A3	A4
	B	B1 1	B2 2	B3 1	B4
	C	C1	C2 4	C3 2	C4 1
	D	D1 4	D2 4	D3 4	D4
	E	E1	E2	E3	E4
		1	2	3	4
		Impact			

Inherent Risk Rating	Corporate Risk Title	Residual Risk		Target Risk	
		Rating	Movement from Q4	Rating	Movement from Q4
A1	Climate Change	A1	↔	B2	↔
	City Security	B1	↔	B1	↔
	Brexit	B2	↔	B3	↔
	Financial Resilience		↔	C2	↔
	Air Quality & Clean Air Strategy	C2	↓	C3	↔
	Cyber Security		↔	D1	↔
	Budget Monitoring (Control)	C2	↔	D2	↔
	Schools Organisation Programme (Band B)		↔	C3	↔
	Health and Safety		↔	D3	↔
	Non-completion of Stat Building Eqpt Maintenance	D1	↔	D2	↔
Information Governance	↔		D2	↔	
A2	Welfare reform	B2	↔	B2	↔
	ICT Platforms Unsuitable/ Outdated	C2	↔	D3	↔
B1	Coastal Erosion	B2	↔	C2	↔
	Waste Management		↔	C2	↔
	Increase in Demand (Children's Services)	C1	↔	D1	↔
	Education – Schools Delegated Budgets	C2	↔	D2	↔
	Business Continuity	D1	↔	D1	↔
Safeguarding	↔		D1	↔	
B2	Education Consortium & Attainment	B3	↔	C4	↔
	Legal Compliance	C2	↔	C2	↔
	Performance Management	D2	↔	D2	↔
	Fraud, Bribery and Corruption		↔	D3	↔

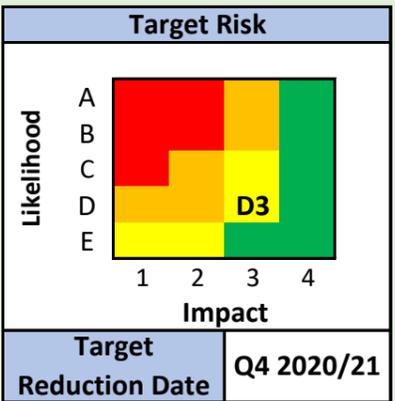
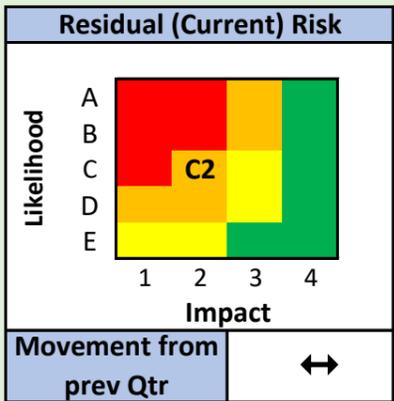
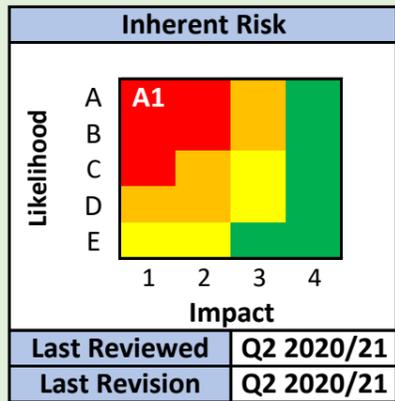


Key	
High (Red)	Medium (Red-Amber)
Medium (Amber-Green)	Low (Green)
↓	Decrease from previous quarter
↔	No change from previous quarter
↑	Increase from previous quarter

This page is intentionally left blank

# Non-completion of Statutory Building Equipment Maintenance

**Description**  
 Non completion of cyclical statutory inspections or the remedial works arising out of the inspections, required to maintain the premises and related installations in a safe and legally compliant condition.



**Risk Owner(s)**  
 Neil Hanratty  
 Councillor Russell Goodway  
 Investment & Development

**Potential Impact(s)**  
 Potential consequences of non-compliance with statutory maintenance:

- Fatalities or serious injuries
- Closure of part or whole of facilities with major disruption to service delivery
- HSE interventions and consequential actions including fines and prosecution;
- Significant additional expenditure requiring realignment of Corporate budgets;
- Temporary relocation of staff
- Temporary loss of operational service
- Invalidation of insurance policy
- Serious adverse impact on reputation
- Damage to fabric of building or other equipment

**What we've done/are currently doing to achieve the Residual Risk Rating**

**Contractor**

- Statutory Planned Preventative Maintenance (PPM) undertaken by competent contractor. Consequential remedial work identified on test certificates.
- Improved statutory maintenance contracting arrangements in place inc. use of SFG 20 as specification for statutory obligations testing and new risk based specification for legionella management supported by RAMIS.
- FM competent person(s) review all test certificates, remedial work captured and communicated to client as necessary/applicable
- Statutory Obligations Team has been established within Building Services to improve monitoring and supervision of statutory obligations contractor. Contractors have been trained in the use of RAMIS in order for test certs to be uploaded directly to the system by contractors.

**RAMIS IT Software**

- RAMIS implemented across the Council with bi-monthly reporting on statistics to SMT;
- 500 Building Managers have received training in their responsibilities and use for the RAMIS system, including schools estates staff and Headteachers.
- Full time officer Administrating RAMIS, providing training and issuing reports from the system to all service areas to push compliance ratings up to a minimum of 80% set by SMT.
- Condition surveys have been completed which represents an extensive piece of work to improve our understanding and knowledge base of all the Council's land and property holdings.

**Corporate Landlord Programme**

- County Estates senior management structure established supporting - Strategic Asset Management, Capital Delivery and Property Services, to manage and deliver all the Council's non-domestic property functions within one portfolio.
- The occupancy agreement (Memorandum of Agreement) for Schools was issued with the Schools Handbook and 'one front door' established to assist implementation. An occupancy agreement for non-schools properties has been drafted. This will be circulated by end of Q4 2020/21 (COVID-19 delay).
- The 'One Front Door' approach was rolled out across the corporate estate by end of Q4 2019/20.

**Statutory Obligation Compliance**

- Continue to commission work to undertake required compliance testing (and works required) where Building Services has responsibility to do so, as defined on RAMIS

**COVID-19**

- During the COVID 19 period, the periodic gas and 6 monthly fire alarm testing has continued in all buildings. In the core buildings, and also Ty Storrie, Crosslands and Dominions Way Buildings, full statutory obligations testing has continued.

**What we plan to do to meet target**

**Statutory Obligation Compliance**

- Continue to commission investigations / work to complete required compliance testing (and works required) in respect of 'gaps' in compliance identified by reports from RAMIS.

**Landlord / Occupancy Agreement**

- Consult on draft Landlord/Occupancy Agreement template Q3 2020/21 and roll out in Q4 2020/21 (delayed from 19/20 due to COVID-19). This will set out principle occupant and landlord permissions responsibilities and Permission for Works arrangements required.
- Landlord occupancy principles established and reviewed for inclusion in non-schools handbook which will be rolled out in Q4 20/21 (delay from 19/20 due to COVID-19).

**COVID-19**

- As WG restrictions are lifted and buildings re-open, the statutory obligation contractor will resume statutory obligations testing.

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	<ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Partnership</li> <li>Community &amp; Environment</li> <li>Stakeholder</li> </ul>
--	--

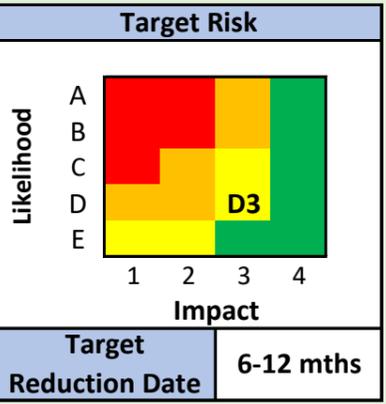
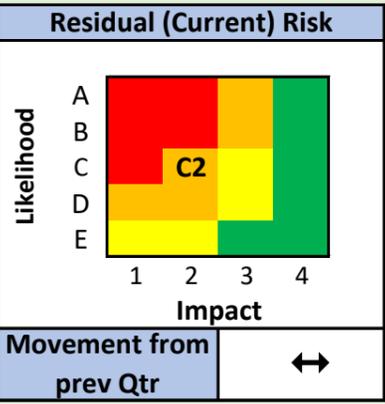
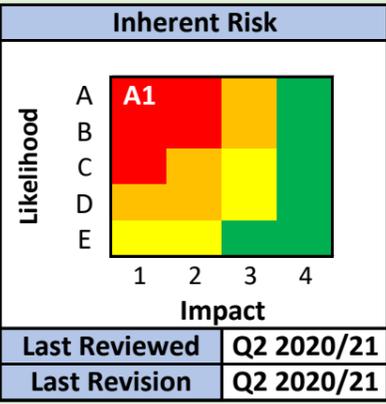
**Linked Risks**  
 Health & Safety

**Key Indicators / Measures used to monitor the risk**  
 Compliance stats from the Corporate Health & Safety Team.

# Health & Safety

**Description**

Non Compliance with corporate health and safety arrangements to control key risks across the Council in line with statutory requirements.



**Risk Owner(s)**

**Chris Lee**  
(Donna Jones)

**Councillor Chris Weaver**  
Finance, Modernisation and Performance

**What we've done/are currently doing to achieve the Residual Risk Rating**

- RAMIS - New platform roll out be completed in QTR 2 along with training webinars and video links to support navigation and use of the new platform.
- Digital Risk Assessment Library - COVID-19 Building and Service risk assessments were to be uploaded in QTR2, this has been affected by the ongoing C-19 workload.
- Completion of Improvement action plan for Street Scene, installation of employee welfare facility.
- Re-launch of Asbestos Training - mix of virtual and practical training in line with COVID-19 Safety measures.
- Due to the impact of COVID-19 Health and Safety resources have been repurposed towards ongoing infection control measures, including Guidance , procurement and issue of PPE and support of vulnerable staff who are at increased risk from the virus. Risk Assessments to support Restart & Recovery across the Council have been essential to ensure that WG and PHW advice is implemented and staff in or returning to work are not exposed to risk of contracting the virus.

**What we plan to do to meet target**

- RAMIS - Continue to roll out new platform in Q3 2020/21, including reporting on performance.
- Mandatory training of Headteachers in H&S/Building responsibilities to be considered in Q3 2020/21, workload permitting.
- Digital Risk Assessment Library - COVID-19 Building and Service risk assessments to be uploaded in Q3/4 2020/21.
- Completion of installation of fire suppression in Lamby Way MRF - Q3/4 2020/21, taking into account any local or national restrictions.
- In Q3/4 2020/21 Produce training webinars for building management training for community organisations operating Council premises.
- Condition Surveys School Buildings - Complete Dissemination of Condition Survey information to schools in Q3 2020/21.
- Continue Asbestos Training - online and face to face in line with COVID-19 Safety measures.
- Due to the continued pandemic H&S and OH resources will continue to be repurposed to support the workforce and limit the transmission of the virus in Council workplaces, as well as setting policy and guidance in relation to infection control and mental health and wellbeing support.

**Potential Impact(s)**

- Fatalities
- Serious injuries
- Prosecution – fines for corporate body and/or fines/imprisonment for individual
- Civil Claims
- Negative Publicity

**Type(s) of Impact**

- Service Delivery
- Reputational
- Legal
- Financial

**Linked Risks**

Non-completion of Statutory Building Equipment Maintenance

**Key Indicators / Measures used to monitor the risk**

RAMIS is used to monitor statutory risk in relation to premises safety, bi-monthly reporting to SMT, quarterly reporting to Health and Safety Forum.  
Compliance against annual Corporate H&S Objectives, used to monitor improvement secured in Service Areas, reported to Health and Safety Forum.

## Schools Organisation Programme (Band B)

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)									
<p>Failure to deliver on aspects of the School Organisation Programme, which is significant in value and complex. The programme consists of Band B (£284m) 21st Century Schools, asset management improvement work, ICT and sufficiency projects. The programme of work spans across a number of directorates, requires significant capacity and has significant capital spend.</p>	<p><b>A1</b></p>	<p><b>C2</b></p>	<p><b>C3</b></p>	<p><b>Nick Batchelar</b> (Richard Portas)</p>	<p><b>Councillor Sarah Merry</b> Deputy Leader &amp; Education, Employment &amp; Skills</p>								
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Last Reviewed</td> <td>Q2 2020/21</td> </tr> <tr> <td>Last Revision</td> <td>Q1 2020/21</td> </tr> </table>	Last Reviewed	Q2 2020/21	Last Revision	Q1 2020/21	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Movement from prev Qtr</td> <td style="text-align: center;">↔</td> </tr> </table>	Movement from prev Qtr	↔	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Target Reduction Date</td> <td>12 mths +</td> </tr> </table>	Target Reduction Date	12 mths +		
Last Reviewed	Q2 2020/21												
Last Revision	Q1 2020/21												
Movement from prev Qtr	↔												
Target Reduction Date	12 mths +												
	<b>What we've done/are currently doing to achieve the Residual Risk Rating</b>			<b>What we plan to do to meet target</b>									
	<ul style="list-style-type: none"> <li>21st Century Schools Band B funding bid was submitted to Welsh Government in July 2017 and the Strategic Outline Case for £284m was approved in November 2017. Two Cabinet Reports in October and December 2018 outlined the priorities for this second phase of funding. SOP reports for Fitzalan, Doyle Avenue and St Mary the Virgin have been considered by Cabinet under Band B. Progression of these schemes and others have been delayed until October due to COVID-19. A review of Band B is underway to assess the budget shortfall and achieve maximum value for money with the funds available.</li> <li>Discussions with developers and contractors are taking place around capacity to deliver projects in light of COVID-19 clauses.</li> <li>Work is ongoing to make sure that all learners have access to digital devices, network and infrastructure to support mobile and distance learning.</li> <li>Robust governance model, in line with Corporate Landlord approach is in place and is supporting consistent decision making.</li> <li>The post of Programme Director has been approved by Cabinet to make permanent and the postholder is establishing the capacity and capability requirements of the programme.</li> <li>Technical feasibility and design work underway</li> <li>Finance have re-profiled the capital and revenue budgets to assess the required budgets for each scheme. There are ongoing discussions with Welsh Government to assess the affordability of the programme in light of the current programme.</li> <li>Developing more robust management and monitoring processes for the asset improvement programme, including the three "D" category High Schools, Fitzalan, Cantonian and Willows.</li> <li>Procurement is underway for ICT infrastructure and devices that will support teaching and learning.</li> </ul>			<ul style="list-style-type: none"> <li>Develop a high level SOP Strategy that outlines the short/ medium and long term aims of the whole programme. The SOP Strategy will be underpinned by the ongoing Band B review.</li> <li>Strengthening of the capacity of the SOP team critical to ensuring effective delivery of the different elements of the programme. The SOP team are overseeing Hub childcare provision that was put in place following closure of schools and supporting Admissions Appeals. Developing capacity includes ensuring that corporate colleagues in departments including legal, strategic estates, capital projects, ICT, planning and highways and transportation are available.</li> <li>Ensure that SOP reports are complete and ready for September and reports are scheduled in a sustainable throughout the next year.</li> <li>Continued active dialogue with Welsh Government and other professional parties to support progress and development.</li> <li>Prioritise population data development to underpin accurate projections and forecasts for existing resident populations and to support effective s106 negotiations going forward.</li> <li>Ensure consistent monitoring and reporting of all risks to Schools Programme Board.</li> <li>Continue to move forward with digital projects to support distance and mobile learning and embed into a long term and sustainable model.</li> </ul>									
<b>Potential Impact(s)</b> <ul style="list-style-type: none"> <li>Opportunities to enhance the school estate, and transform education will be missed</li> <li>Insufficient secondary places in some central and north east areas of the city</li> <li>Insufficient places in ALN settings across the city, leading to costly placement in out of county &amp; private settings</li> <li>School buildings that are not suitable for teaching and learning</li> <li>Further degeneration of school buildings &amp; rise in asset management backlog</li> <li>Project cost and time overruns</li> <li>Risk that school ICT infrastructure fails in the short to medium term and does not support the new curriculum</li> <li>Risk that in current situation, learners do not have access to ICT equipment to support distance learning</li> </ul>	<b>Linked Risks</b>			<b>Key Indicators / Measures used to monitor the risk</b>									
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th colspan="2" style="text-align: left;">Type(s) of Impact</th> </tr> <tr> <td style="width: 50%;"> <ul style="list-style-type: none"> <li>Reputational</li> <li>Legal</li> <li>Financial</li> <li>Social</li> </ul> </td> <td style="width: 50%;"> <ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Stakeholder</li> <li>Health and Wellbeing</li> <li>Sustainability</li> </ul> </td> </tr> </table>	Type(s) of Impact		<ul style="list-style-type: none"> <li>Reputational</li> <li>Legal</li> <li>Financial</li> <li>Social</li> </ul>	<ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Stakeholder</li> <li>Health and Wellbeing</li> <li>Sustainability</li> </ul>				<ul style="list-style-type: none"> <li>Proportion of Priority 1a Schools Asset Improvement works completed in financial year, in accordance with the responsibilities of schools and corporate landlord (Corporate Plan).</li> <li>Timelines to deliver projects within the SOP programme.</li> <li>New key performance measures which are being developed as part of the overarching SOP Strategy.</li> </ul>					
Type(s) of Impact													
<ul style="list-style-type: none"> <li>Reputational</li> <li>Legal</li> <li>Financial</li> <li>Social</li> </ul>	<ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Stakeholder</li> <li>Health and Wellbeing</li> <li>Sustainability</li> </ul>												

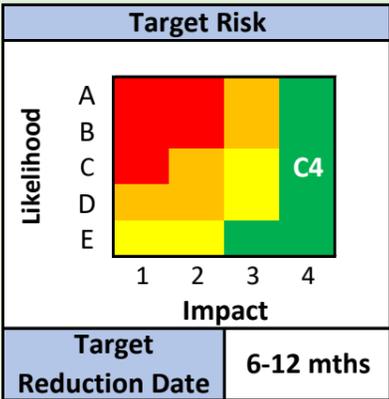
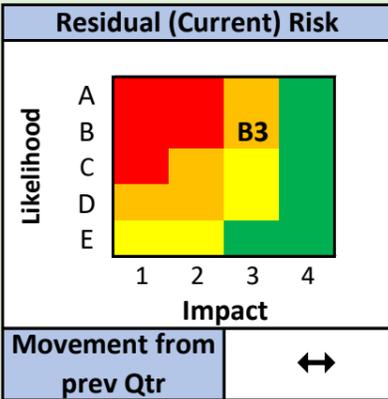
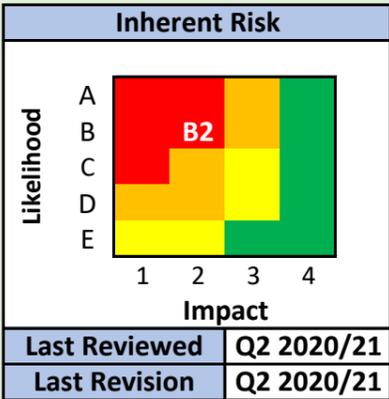
## Education - Schools' Delegated Budgets

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)									
<p>The number of schools with deficit budgets and/or the overall value of deficit budgets increases, or that those schools (particularly in the Secondary sector) with existing deficit budgets do not deliver agreed deficit recovery plans.</p>				<b>Nick Batchelar</b> (Neil Hardee)	<b>Councillor Sarah Merry</b> Deputy Leader & Education, Employment & Skills								
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="background-color: #d9e1f2;">Last Reviewed</td><td>Q2 2020/21</td></tr> <tr><td style="background-color: #d9e1f2;">Last Revision</td><td>Q2 2020/21</td></tr> </table>	Last Reviewed	Q2 2020/21	Last Revision	Q2 2020/21	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="background-color: #d9e1f2;">Movement from prev Qtr</td><td style="text-align: center;">↔</td></tr> </table>	Movement from prev Qtr	↔	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="background-color: #d9e1f2;">Target Reduction Date</td><td>12 mths +</td></tr> </table>	Target Reduction Date	12 mths +		
Last Reviewed	Q2 2020/21												
Last Revision	Q2 2020/21												
Movement from prev Qtr	↔												
Target Reduction Date	12 mths +												
	<b>What we've done/are currently doing to achieve the Residual Risk Rating</b>			<b>What we plan to do to meet target</b>									
	<ul style="list-style-type: none"> <li>The 2020/21 delegated budget allocations were issued to schools in early March 2020 and monitoring arrangements put in place for those schools showing financial concern.</li> <li>Officers from Education and Financial Services work with individual schools through Headteachers and Governing Bodies to formulate Medium Term Financial Plans (MTFP) to seek to either balance individual school deficits within four financial years or to ensure that the accumulated deficits were frozen or slowed as much as possible.</li> <li>Officers continue to monitor and challenge those schools in deficit before allowing any additional financial commitments, both staffing and other expenditure.</li> <li>For each school in deficit, the Council has identified a monitoring officer to provide an independent challenge to the school. This is in addition to the LFM Officer currently supporting that school.</li> <li>Annual audit of budget impact on individual schools undertaken during the Summer Term, the results of which feed into discussions regarding the medium term financial plan</li> <li>A working group has been established to examine the medium term financial planning processes used by the LA and schools</li> <li>For the 2020/21 financial year, seven schools have deficit budgets, representing a reduction on the figure for the previous year. Of those seven, four had deficit budgets in 2019/20. Of note is the fact that three high schools emerged from longstanding deficit positions, setting balanced budgets in 2020/21.</li> </ul>			<ul style="list-style-type: none"> <li>Officers exercise the statutory powers of intervention on a school or schools in deficit who are unable to provide a medium term financial plan. This may involve removing delegation from a Governing Body.</li> <li>Officers explore through the School Organisation Planning process how different organisational arrangements for schools would affect the supply of pupils to schools thus affecting their delegated budgets. This will include an understanding of the long term impact of any unused school supply places on the funding formula.</li> <li>Working with CSC to ensure that maximising value from constituent parts of Education Improvement Grant is secured and that there is clarity of allocation mechanism for 2019/20 and beyond</li> <li>Improve individual school risk assessment processes in order to provide an early indication of those schools who may be at risk of entering a deficit position</li> </ul>									
<b>Potential Impact(s)</b>	<b>Type(s) of Impact</b>		<b>Linked Risks</b>		<b>Key Indicators / Measures used to monitor the risk</b>								
<ul style="list-style-type: none"> <li>An overall deficit arising from schools budgets would count against the funding available for the Council</li> <li>Schools with deficit budgets may struggle to adequately fund the resources required to achieve the desired levels of educational attainment</li> <li>Schools with deficit budgets may struggle to adequately fund maintenance of school buildings creating an issue for other budgets, eg Capital/SOP Band B</li> <li>Schools that continually fail to address deficit budgets may ultimately require LA intervention, with a corresponding increase required in centralised resources</li> </ul>	<ul style="list-style-type: none"> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	Linked risk to Covid 19 issues particularly with regard to decrease in income, impact on grants and inability to manage staffing changes.		<ul style="list-style-type: none"> <li>School budget monitoring position</li> <li>Number of schools setting deficit budgets</li> <li>Final budget balances</li> </ul>									

# Education Consortium & Attainment

**Description**

The Central South Consortium does not deliver effective services that challenge and support Cardiff schools to improve - the CSC model will need to be adapted to meet the emerging needs of education reform in Wales, including the new curriculum and accountability and assessment changes.



**Risk Owner(s)**

**Nick Batchelar**

**Councillor Sarah Merry**  
Deputy Leader &  
Education, Employment & Skills

**What we've done/are currently doing to achieve the Residual Risk Rating**

- The performance of Cardiff schools has shown notable improvement over the past five years and reflects a focus on education as a key component of Capital Ambition. Results for the academic year 2018/19 show that Cardiff schools performed well across a wide range of key performance indicators at all key stages. This includes strong performance in Key Stage 4 when compared to the Central South Consortium and Welsh averages.
- Given the decision to cancel examinations this summer as a result of the pandemic, the WJEC have developed a process which allows grades to be based on Centre Assessment Grades and Rank Orders which have been submitted by teachers/ lecturers.
- On the 17th August, the Minister for Education in Wales confirmed that A-Level, AS, GCSE, Skills Challenge Certificate and Welsh Baccalaureate grades in Wales will be awarded on the basis of Centre Assessment Grades.
- Schools opened full time to all pupils from September 14th.
- CSC Continuity of Learning guidance including isolating groups scenarios published 9th October 2020. Webinars to facilitate sharing of good practice across schools.

**What we plan to do to meet target**

- The Joint Committee of CSC will determine what follow up actions will be taken in light of any recommendations from the report.
- 28th August: WG commissioned an independent review of the arrangements for awarding grades for the 2020 summer exam series, and considerations for 2021. Report and recommendations due December 2020.
- WJEC November 2020 and January 2021 examinations currently due to go ahead as planned
- WJEC have published GCSE and AS/A Level subject adaptations booklets for assessments in summer 2021.
- In addition, the Summer 2021 provisional exam timetable has been published including a contingency period starting from end of June 2020.
- CSC Improvement Partners are supporting schools in their development of Teaching and Learning (including Blended learning) for their own contexts.
- Timelines for Curriculum for Wales 2022 are currently unchanged.

**Potential Impact(s)**

- Learners do not reach their full potential
- Schools are not supported to improve
- Schools are not able to deliver the new curriculum
- Educational performance does not improve
- Impact on Estyn judgements
- Value for money - CSC
- Budget implications
- Intervention from WG

**Type(s) of Impact**

- Reputational
- Legal
- Financial

**Linked Risks**

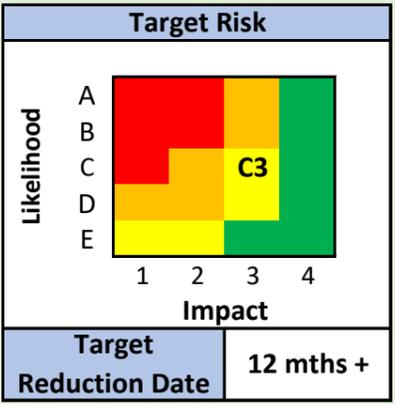
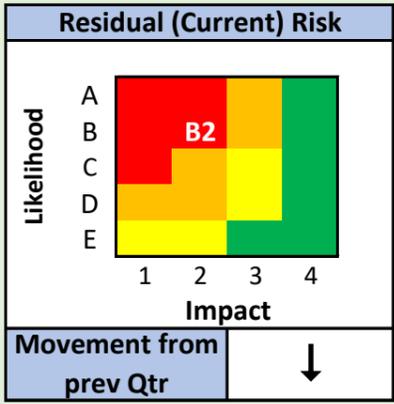
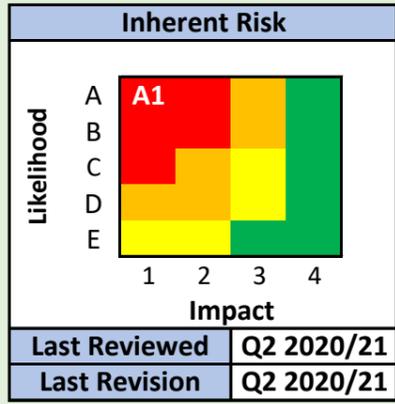
**Key Indicators / Measures used to monitor the risk**

KS4 2018/19 School Performance, Outcomes from Estyn Inspections up to 2020.

# Air Quality & Clean Air Strategy

**Description**

Air quality in Cardiff does not meet statutory requirements set by legislation and continues to have a detrimental impact on health for residents and visitors to Cardiff.



**Risk Owner(s)**

**Andrew Gregory**  
(Jason Bale)

**Councillor Caro Wild**  
Strategic Planning & Transport

**What we've done/are currently doing to achieve the Residual Risk Rating**

Monitoring – Update 2020, increased the non-automatic monitoring sites in Cardiff which monitor levels of nitrogen dioxide (NO2) to 111 locations. Included in this data are 15 schools across the City, plus TRO projects at schools to monitor impact of pilot projects on air quality around schools.

There are two live monitoring stations:

- Cardiff Frederick Street: Monitors 24/7 measuring levels of NO2, PM10 & PM2.5, SO2, CO and O3
- Richard’s Terrace, Newport Road: Monitors 24/7 measuring levels of NO2 & PM10

The primary source of the pollution is road transport emissions, particularly diesel vehicle emissions. Although improvements are being seen, non-compliance of the NO2 limit values is projected beyond 2020. Cardiff has 4 existing declared Air Quality Management Areas (AQMA’s) all as a result of elevated NO2 concentrations resulting from road traffic emissions. Local modelling indicates that Castle Street will not be compliant with the NO2 limit value beyond 2020 if no additional interventions are implemented to reduce pollution levels. Air Quality has seen a significant improvement as a direct impact from COVID 19 and the strict lock down measures in the early part of the outbreak, Ongoing recovery measures such as the closure of Castle Street has enabled the maintenance of the reduced air quality concentrations. In other areas levels have increased, but still remain below pre COVID concentrations. However it must be noted that there are numerous factors which will influence the results especially meteorological conditions.

- State Aid issues around Bus Retrofit Scheme completed and scheme was approved by Commission in August. Following completion of all application and terms and conditions scheme will launch 1st October 2020
- Ph1 City Centre West scheme (Wood St & Central Square) commenced.
- Phase 2 Castle Street Tender has been suspended owing to the on going internal discussions with Cabinet on whether to further enhance this scheme. Any change to the final Castle St design will require formal approval from Welsh Gov and the clean air plan would require further modification and re submission including additional modelling both transportation and air quality dispersion.
- Real-time monitor installed and connected to electrical supply on Castle Street in late august. Commission of connection and meter age means station will be operational from Mid October. purchased and awaiting installation availability due to COVID restrictions.
- 5 indicative real time monitors installed on Castle Street (temporary), Westgate Street, Lower Cathedral Rd, Tudor Street and North Rd. Data is recorded every 15 minutes. Working with web team to develop public visual display for Council website.
- Awaiting decision on revised Taxi Scheme prior to launch.

**What we plan to do to meet target**

- 'Implement Clean Air Plan - Implement package of measures detailed in Final Plan, as per agreed plan and programme, following successful WG funding award.
- Submit proposals to WG on the requirements of assessing modifications to the Castle Street Scheme as approved by cabinet. Will require further modelling and assessment of the scheme and a revised Clean Air Plan produced. Will require ongoing dialogue with WG, and their expert panel.
- Working with consultants to develop evaluation plan of air quality improvements to show impact of measures and that compliance will be achieved.
- Work with Public Health Wales to quantify future health benefits and improvements from reduced emissions/ NO2 concentrations
- Clean Air Strategy and Action Plan - In developing the Clean Air Plan the Council has further developed a wider Clean Air Strategy and Action Plan to satisfy the requirements of LAQM. The strategy includes measures that will likely provide further AQ improvements including AQMAs. The roll out of these measures have been delayed by COVID and are dependent on additional funding sources being available through any appropriate grant bidding etc.
- Pilot project for implementation of Non Idling Zones, targeted around schools.
- Living Walls and other Green Infrastructure
- Progression of EV Infrastructure and Council Fleet working with CTS.
- Air Quality Planning Guidance
- Schools Active Travel
- Behavioural Change Promotion, Car Free Day, Clean Air Day etc.
- Expansion of Real-time monitoring network & display/sharing of data linked to SMART Corridors Project

**Potential Impact(s)**

**Health & Safety**

- No improvement to health
- Increased burden on health care
- Further deterioration of related health conditions

**Legal & Regulatory / Financial**

- Breach of legal / statutory requirements
- Potential significant financial penalty

**Type(s) of Impact**

- Health
- Regulatory
- Financial
- Strategic
- Reputational

**Linked Risks**

Further delays to City Centre Schemes and further impacts from further outbreaks/ waves from COVID.

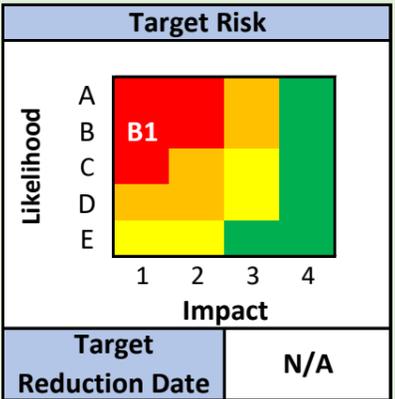
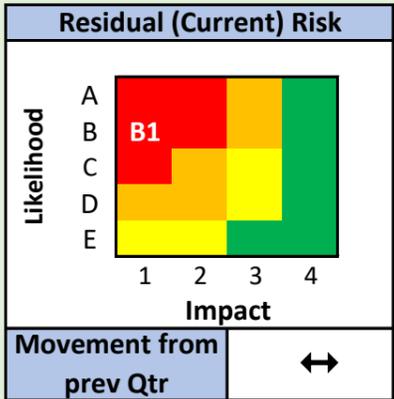
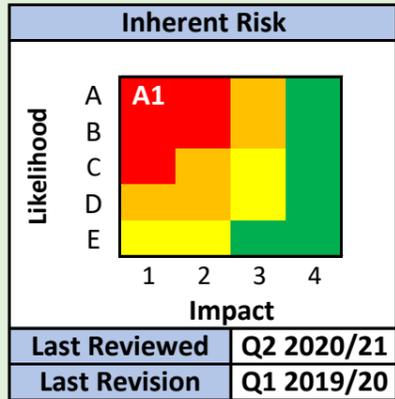
**Key Indicators / Measures used to monitor the risk**

- Implementation Plan for measures (funding dependent)
- Monitoring and Evaluation Plan for Clean Air Plan
- Ongoing monitoring and reporting under LAQM

# City Security

**Description**

Major security-related incident in 'crowded places' as a result of international or domestic terrorism.



**Risk Owner(s)**

**Chris Lee**  
(Isabelle Bignall)

**Andrew Gregory**

**Councillor Huw Thomas**  
Leader

**What we've done/are currently doing to achieve the Residual Risk Rating**

- All existing identified high-risk, crowded places have been formally assessed
- Some crowded places have an extremely limited and in some cases 'third party managed' access control process to operate them; providing little/no challenge
- CONTEST Protect/Prepare Task & Finish Group maintains the City Gateways Public Realm Enhancement Scheme, with agreed options for suitable PAS 68/69 mitigation for appropriate boundary locations; referred to as 'gateways'
- The work done in the city to address security concerns has been predominantly focused on the provision of physical assets to mitigate against the threat of hostile vehicles
- Protected as at Q1 2019/20**  
- Principality Stadium, St Mary Street, Queen Street, St David's Dewi Sant, Cardiff Bay
- The Cardiff City Centre Access Control Protocol is currently operating at the heightened response level, reflecting the UK National Threat Level; permitting vehicles onto the pedestrianised areas within Cardiff City Centre using strict parameters
- Wales Extremism and Counter Terrorism Unit (WECTU) Counter Terrorist Security Advisor's (CTSA's), the Emergency Services & Cardiff Council provide Project Argus and EVAC/Griffin training across the city to raise awareness for likely impacts associated with major incidents and in particular, terrorist attacks. The sessions also cover the support likely to be immediately available from the emergency services and Cardiff Council, the practical and simple preparations people/organisations can make prior to an incident occurring to help themselves manage and recover from its impacts.

**What we plan to do to meet target**

- The CONTEST Protect/Prepare Group will continue to monitor and review the city's Hostile Vehicle Mitigation scheme to ensure it is fit for purpose
- The CONTEST Protect/Prepare Group will give a status report to the Cardiff CONTEST Board
- The CONTEST Board will continue to try to identify external funding sources/opportunities from Welsh Government and UK Central Government to conclude scheme and appropriately mitigate the risk
- A holistic security strategy for the city is being developed through the city's CONTEST partnership mechanisms. This strategy will extend the perspective of the city's security beyond hostile vehicle mitigation to incorporate a range of security measures, including the continuing development and agglomeration of the city's CCTV and the deployment of new technological solutions.
- The security strategy will allow partners to be more responsive to emerging funding opportunities
- Identify any potential routes for further funding to enable us to continue the Hostile Vehicle Mitigation (HVM) programme of delivery. Cost estimate to complete City Centre and Bay is £2.5-£3.0M. This will complete the recommended improvements indicated as high risk identified by CONTEST Protect/Prepare group.

**Potential Impact(s)**

**Immediate / Short-Term**

- Large numbers of fatalities, injuries to public
- Extensive structural damage and/or collapse of buildings
- Closure of roads having impact on transport network and access to businesses and properties.
- Damage/disruption to utilities (gas, electricity, water etc.)
- Immediate impact to core business, retail and sporting district in the centre of Cardiff

**Ongoing / Longer Term**

- Reputational risk due to a public perception Cardiff is an unsafe place
- Area viewed as a risk for potential future business investment.
- Inability to attract major future national and international events (political, sporting etc.)
- Increase in demand for Council services/support for all affected.
- Current economic climate to reduce the effectiveness of any recovery/regeneration of the area.

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	<ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Partnership</li> <li>Community &amp; Environment</li> <li>Stakeholder</li> </ul>
--	--

**Linked Risks**

**Key Indicators / Measures used to monitor the risk**

- National Threat Level and period at level (**increased to Severe as at November 2020**)
- No of 'Crowded Places' not protected to PAS 68/69 level

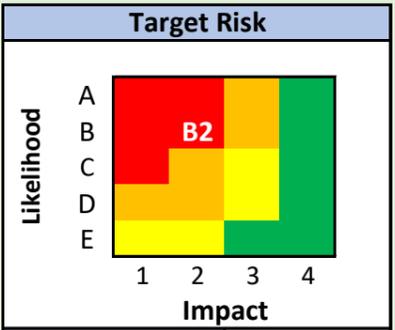
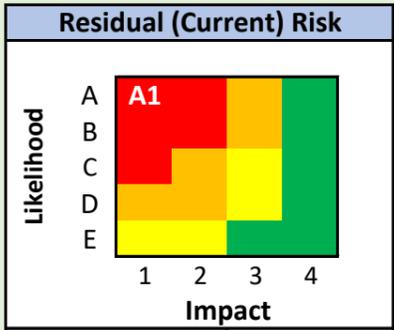
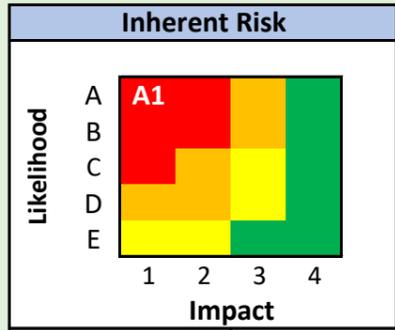
# Climate Change & Energy Security

**Description**  
Cardiff is not able to manage the effects of climate change and energy security due to lack of future proofing for key (social and civil) infrastructure and business development.

**Potential Impact(s)**

- Flood & Storm**
- Loss of life and risk to life
  - Direct damage to property, utilities and critical infrastructure
  - Blight of Land and Development
  - Disruption to service delivery
  - Contamination and disease from flood and sewer water and flood on contaminated land
  - Increase in health issues
  - Break up of community and social cohesion
  - Increase cost of insurance
  - Migration of ecosystems
  - Inconsistent energy supply
  - Increased costs
  - Inability to deliver public services
  - Decrease in economic output
  - Disruption to the supply of utilities
  - Increased fuel poverty

Page 332



Last Reviewed Q2 2020/21  
Last Revision Q1 2020/21

Movement from prev Qtr ↔

Target Reduction Date 12 mths +

**Risk Owner(s)**

Andrew Gregory

Councillor Michael Michael  
Clean Streets, Recycling and Environment

**What we've done/are currently doing to achieve the Residual Risk Rating**

The Council has declared a Climate Emergency.

The following specific risk areas have been identified:

- COASTAL EROSION (see separate tab for details)
- FLOODING
- EXTREME WEATHER
- ENERGY SECURITY & DECARBONISATION
- BIODIVERSITY

**What we plan to do to meet target**

- Develop strategic response to the Climate Emergency Declaration to incorporate carbon neutral target. First draft of One Planet Cardiff in partnership with Cabinet Office is being drafted for presentation to Cabinet in September 2020.
- COASTAL EROSION (see separate tab for details)
- FLOODING
- EXTREME WEATHER
- ENERGY SECURITY & DECARBONISATION
- BIODIVERSITY

- Type(s) of Impact**
- Service Delivery
  - Reputational
  - Legal
  - Financial
  - Health & Safety
  - Partnership
  - Community & Environment
  - Stakeholder

- Linked Risks**
- Coastal Erosion
  - Air Quality
  - Business Continuity

- Linked Documents**
- <https://www.evaccardiff.co.uk/>
  - <https://www.cdp.net/en>

- Key Indicators / Measures used to monitor the risk**
- Storm Events that meet silver & gold emergency intervention
  - Annual number of flooded properties and severity (statutory reporting)
  - Energy use / renewable energy production of Cardiff Council

# Climate Change - Biodiversity

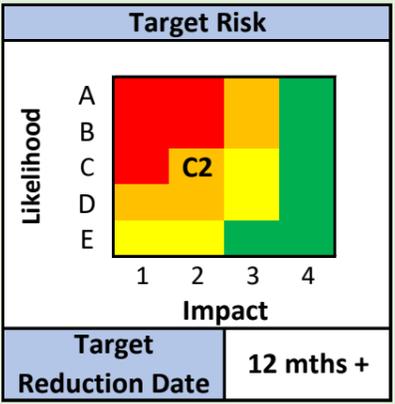
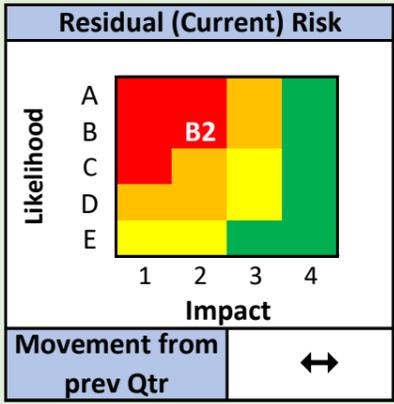
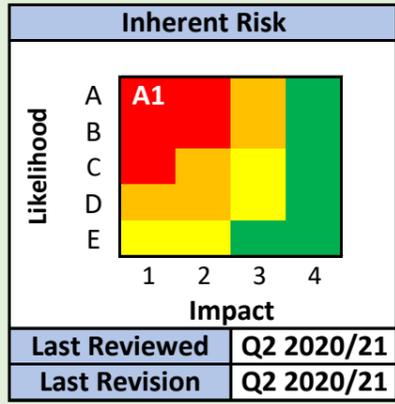
**Description**  
Cardiff is not able to manage the effects of climate change and energy security due to lack of future proofing for key (social and civil) infrastructure and business development.

**Potential Impact(s)**

- Loss of biodiversity leads to reduction in ecosystem resilience, and reduction in ecosystem resilience will compromise the provision of ecosystem services. These are the services or benefits which we gain from the natural environment.
- Ecosystem services include climate change mitigation and adaptation.
- Climate change mitigation includes the sequestration and storage of carbon by plants, especially long-lived species such as trees. Reduction of this ecosystem service makes it harder to reduce net carbon emissions. Annually Cardiff's trees (not including other aspects of green infrastructure) provide ecosystem services worth £3.31 million, of which £1.9 million is in carbon storage and sequestration (iTree Study, Sept 2018).
- Climate change adaptation services include storm water attenuation by vegetation and reduction of surface water volume through evapotranspiration
- Trees, green walls and green roofs allow cooling and shading, thereby mitigating the urban heat island effect which may become more prevalent with a warmer climate.
- Hotter summers also increase risk of aerial pollution through air stagnation, and green infrastructure can remove certain pollutants from the air as well as having a cooling effect.
- The National Priorities of the WG Natural Resources Policy include 'Delivering Nature-based Solutions'. Failure to ensure protection of biodiversity and ecosystem resilience risks failure to deliver these nature-based solutions, which include climate change mitigation and adaptation.

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	<ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Partnership</li> <li>Community &amp; Environment</li> <li>Stakeholder</li> </ul>
--	--



**Risk Owner(s)**

<b>Andrew Gregory</b> (James Clemence/ Simon Gilbert/ Matthew Harris/ Jon Maidment)	<b>Councillor Michael Michael</b> Clean Streets, Recycling and Environment
---	--

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Developed a Biodiversity and Resilience of Ecosystems Duty Forward Plan, to implement the statutory duty to seek to maintain and enhance biodiversity and in doing so to promote ecosystem resilience.
- Undertaken an 'iTree-Eco' study to look at the value of trees in terms of the ecosystem services that they provide.
- Working with neighbouring Local Authorities through the Local Nature Partnership Cymru project to share ideas and best practise for enhancing biodiversity across the City and identifying opportunities for cross-boundary projects to improve habitat and species connectivity and increase ecosystem resilience.
- Contributed to the Central South Wales Area Statement recently published by Natural Resources Wales.

**What we plan to do to meet target**

- Develop Coed Caerdydd Strategy to maximise tree canopy cover within Cardiff
- Report every three years on the Biodiversity and Resilience of Ecosystems Duty Forward Plan, and continue to improve the plan as necessary
- Seek opportunities for partnership working under the 5 main themes of the South Wales Area Statement (building resilient ecosystems, working with water, connecting people with nature, improving our health, improving our air quality).

**Linked Risks**

- Coastal Erosion
- Air Quality
- Business Continuity
- Energy decarbonisation

**Linked Documents**

- <https://www.evaccardiff.co.uk/>
- <https://www.cdp.net/en>

**Key Indicators / Measures used to monitor the risk**

Extent of Green Infrastructure in the City.

# Climate Change - Energy Security & Decarbonisation

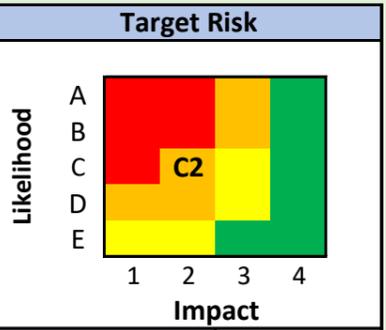
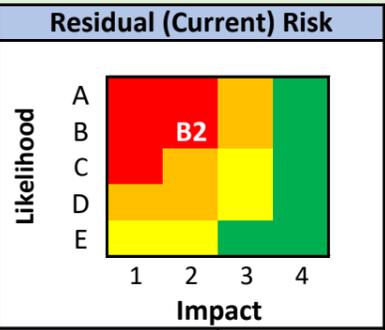
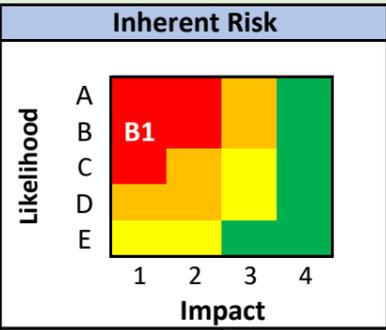
**Description**  
Cardiff is not able to manage the effects of climate change and energy security due to lack of future proofing for key (social and civil) infrastructure and business development.

**Potential Impact(s)**

**Energy security (energy efficiency & decarbonisation of supply)**

- Inconsistent energy supply
- Increased costs
- Inability to deliver public services
- Decrease in economic output
- Disruption to the supply of utilities
- Increased transport costs
- Increased costs for heating / providing services to buildings
- Increased fuel poverty

Page 334



Last Reviewed Q2 2020/21  
Last Revision Q2 2020/21

Movement from prev Qtr ↔

Target Reduction Date 12 mths +

**Risk Owner(s)**

**Andrew Gregory**  
(Gareth Harcombe/ Liz Lambert)

**Councillor Michael Michael**  
Clean Streets, Recycling and Environment

**What we've done/are currently doing to achieve the Residual Risk Rating**

**Energy security (energy efficiency & decarbonisation of supply)**

- Climate Emergency Declared by Council
- Council approved "One Planet Cardiff" Strategy on October 15th 2020 which addresses the Climate emergency and sets a pathway to a carbon neutral Council by 2030 and consultation launched.
- Energy efficiency measures being installed through Re-Fit and Salix projects
- Phase 2 of Re-Fit project finalised and going through due diligence with Salix funding organisations
- NPS Consortium approach to purchasing energy to secure best prices - continuing by Economic Development
- Lamby Way solar farm final business plan approved by Cabinet following planning consent, and construction underway
- District Heat Network proposals - Cabinet authority to proceed, subject to financial business case approval - Grant and Loan funding package now secured
- Engaging with WG on compliance with WG target for public sector to be carbon neutral by 2030
- Scoping additional carbon reduction projects for future action
- Delivering Low Emission Transport Strategy - approved April 2018 and implementation of action plan underway
- Scope out and implement additional energy efficiency schemes in residential properties in the city
- Supporting enhancement of public's own resilience through advice and guidance available from EVAC Cardiff Website, to help them work to reduce their carbon outputs and support carbon capture initiatives
- Reporting on citywide and Council (scope 1 and 2) carbon emissions via the Carbon Disclosure Project to fulfil our Compact of Mayors commitment

**What we plan to do to meet target**

**Energy security (energy efficiency & decarbonisation of supply)**

- Consult on council approved draft "One Planet Cardiff" Strategy, setting specific decarbonisation and renewable energy generation targets, by Spring 2021 - including Carbon Neutral Public Sector by 2030
- Lamby Way solar farm is complete and awaiting connection to the grid which should be complete before the end of October. We are in contract negotiations on the private wire connection to Welsh Water and this should be complete before the Spring of next year. Construction of this is constrained by NRW ecology embargos on over-winter works which we are trying to work around.
- Procurement exercise for Heat Network is mid-way through, with December Cabinet targeted for final decisions to proceed. Subject to cabinet approval of the Final Business Case contracts will be signed in Feb/March 2020.
- Work with WG Energy Services advisors to assess future renewable generation and carbon reduction schemes - ongoing and with an additional bid for funding support made to Welsh Government.
- Seek ways to accelerate housing energy efficiency and retrofit schemes across the city - cabinet considering report on some acceleration plans in October. Also submitting funding bids to BEIS and WG.
- Electric Vehicle strategy - first tranche of residential chargers delivered and proposals to convert council fleet to electric being finalised but now subject to funding issue due to Covid-19 (was to be CPE funded) - funding bids to be submitted and discussion with Central Finance on options
- Work with other LA's and partners in both Wales and the wider city region to take effective action to reduce carbon outputs and capture carbon through "nature by design" options. This will support Cardiff Council's One Planet Cardiff strategy.

**Type(s) of Impact**

- |  |  |
|--|--|
| <ul style="list-style-type: none"> <li>• Service Delivery</li> <li>• Reputational</li> <li>• Legal</li> <li>• Financial</li> </ul> | <ul style="list-style-type: none"> <li>• Health &amp; Safety</li> <li>• Partnership</li> <li>• Community &amp; Environment</li> <li>• Stakeholder</li> </ul> |
|--|--|

**Linked Risks**

- Coastal Erosion
- Air Quality
- Business Continuity

**Linked Documents**

- <https://www.evaccardiff.co.uk/>
- <https://www.cdp.net/en>

**Key Indicators / Measures used to monitor the risk**

Energy use / renewable energy production of Cardiff Council

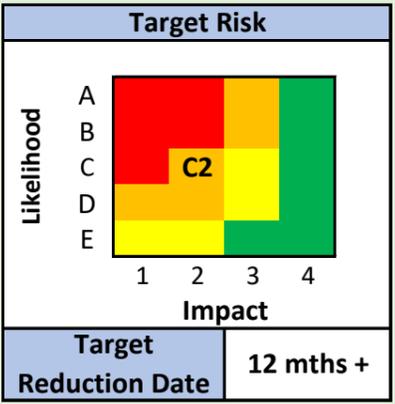
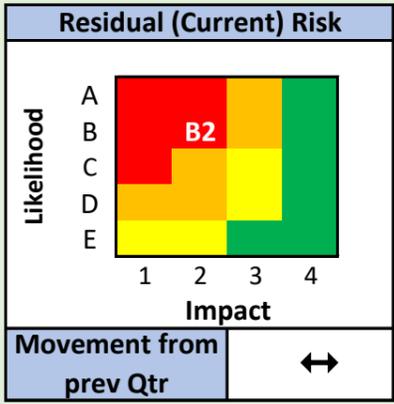
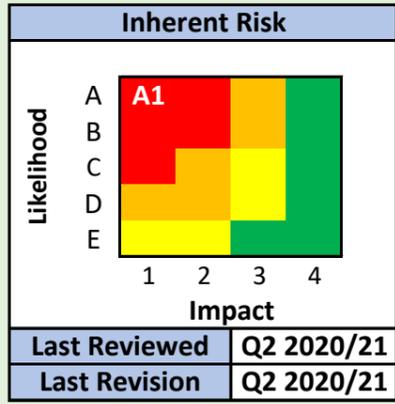
# Climate Change - Extreme Weather

**Description**  
Cardiff is not able to manage the effects of climate change and energy security due to lack of future proofing for key (social and civil) infrastructure and business development.

- Potential Impact(s)**
- Loss of life and risk to life
  - Damage to infrastructure & utilities
  - Service delivery
  - Increase in health related issues including air quality
  - Blight of development
  - Migration of ecosystems

Page 335

- Type(s) of Impact**
- Service Delivery
  - Reputational
  - Legal
  - Financial
  - Health & Safety
  - Partnership
  - Community & Environment
  - Stakeholder



**Risk Owner(s)**

**Andrew Gregory**  
(EMU/Gary Brown)

**Councillor Michael Michael**  
Clean Streets, Recycling and Environment

**What we've done/are currently doing to achieve the Residual Risk Rating**

**The Council has declared a Climate Emergency**

**Extreme Heat**

- Working with Partners in the LRF to warn them of anticipated heatwave impacts upon vulnerable groups and support response to such a risk
- Supporting the enhancement of the public's own resilience through advice and guidance available from the EVAC Cardiff Website

**Extreme Cold/ Snow**

- Implementation of Council's Cold Weather Response Plans
- Winter Service review undertaken to consider the potential impact of Covid-19

**What we plan to do to meet target**

**Extreme Heat**

- Develop a 20 year heat mitigation strategy for the city. Working with partner agencies and commercial stakeholders to support development of heat reduction programmes.
- Engage with Welsh Government within WLGA, and PSB to ensure consistent support in managing this risk ensuring the planning process works for all stakeholders to ensure we develop sustainable planning strategies for future developments, planning the management of this risk

**Extreme Cold/ Snow**

- Due to the challenges of Covid 19, the concentration has been on building resilience into the Winter Service. Covid 19 represents a high risk to staff resource due to illness and the requirements of isolation. Although the required training and staff rotas have been put in place, further work is ongoing to provide resilience should resources be severely hit by the pandemic. However, it must be recognised that there is a limited available resource with the required skillsets within the authority and although investigations as to whether external assistance can be utilised/is available is ongoing, the potential for service disruption cannot be ruled out.

**Linked Risks**

Coastal Erosion  
Air Quality  
Business Continuity

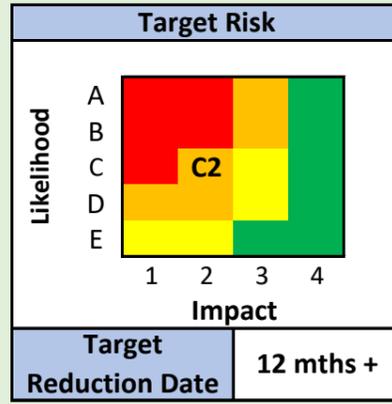
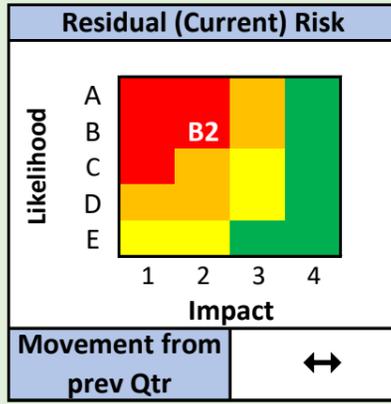
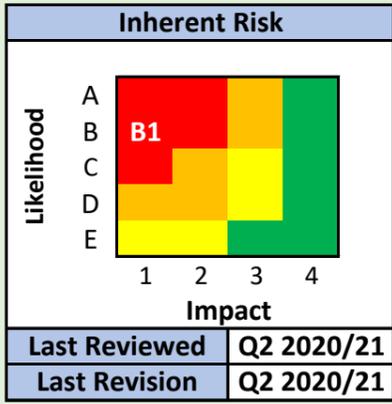
**Linked Documents**

<https://www.evaccardiff.co.uk/>  
<https://www.cdp.net/en>

**Key Indicators / Measures used to monitor the risk**

## Climate Change - Flooding

**Description**  
Cardiff is not able to manage the effects of climate change and energy security due to lack of future proofing for key (social and civil) infrastructure and business development.



**Risk Owner(s)**

**Andrew Gregory**  
(Gary Brown/ David Brain  
James Clemence/ Stuart  
Williams)

**Councillor Michael Michael**  
Clean Streets, Recycling and  
Environment

**Potential Impact(s)**

**Flood & Storm**

- Loss of life and risk to life
- Direct damage to property, utilities and critical infrastructure
- Blight of Land and Development
- Disruption to service delivery
- Contamination and disease from flood and sewer water and flood on contaminated land
- Increase in health issues
- Break up of community and social cohesion
- Increase cost of insurance
- Migration of ecosystems

**What we've done/are currently doing to achieve the Residual Risk Rating**

**The Council has declared a Climate Emergency**

**Flood & Storm**

- Working with partners within the Local Resilience Forum (LRF) to support the management of this risk including supporting the emergency response to this risk
- Supporting the enhancement of the public's own resilience through advice and guidance available from the EVAC Cardiff Website
- Implementation of Schedule 3 of the Flood and Water Management Act 2010 requires all new development over 100m2 to implement sustainable drainage, resilient to flooding
- Development of Flood Risk Management Strategy
- Currently introducing Flood Incident Management software to provide better understanding of spatial distribution of flood events filtered by source, and determine priority areas for future flood alleviation schemes to be implemented (subject to WG funding bid opportunities). Funding bids have been submitted and grant funding now awarded for 20/21 for Business Justification Cases for a number of these schemes.

**What we plan to do to meet target**

**Flood & Storm**

The following actions are ongoing:

- Develop new iteration of the Local Flood Management Strategy
- Develop new iteration of the Flood Risk Management Plan
- Develop enhanced engagement programme with partners supporting the public in enhancing their own resilience
- Improve communication on what to do in a flood and raise awareness of risk
- Improve the service provided by the SuDS Approval Body (SAB)
- Deliver guidance to increase standards and ease of development
- Asset management - Delivery of Flood Management and Coastal Improvement Schemes and rationalise/ prioritise gully maintenance schedule based on the outputs of the Flood Incident Management software. Ongoing CCTV and asset capture work taking place in drainage networks to review high risk areas.
- Apply for further grant funding to support studies and implementation of localised flood preventions schemes.

**Type(s) of Impact**

- Service Delivery
- Reputational
- Legal
- Financial
- Health & Safety
- Partnership
- Community & Environment
- Stakeholder

**Linked Risks**

Coastal Erosion  
Air Quality  
Business Continuity

**Linked Documents**

<https://www.evaccardiff.co.uk/>  
<https://www.cdp.net/en>

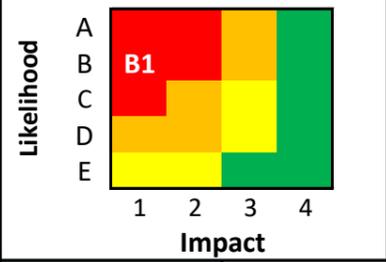
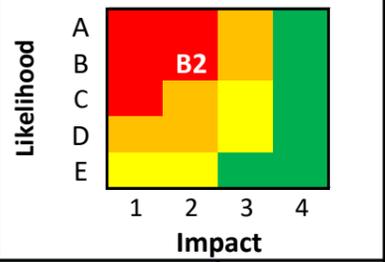
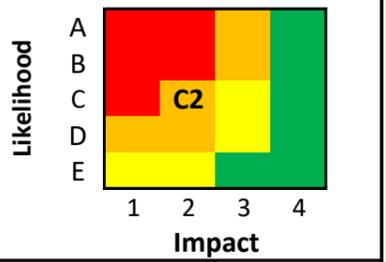
**Key Indicators / Measures used to monitor the risk**

Storm Events that meet silver & gold emergency intervention  
Annual number of flooded properties and severity (statutory reporting)  
Energy use / renewable energy production of Cardiff Council

# Coastal Erosion

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)																	
<p>Breach of current defences resulting in widespread flooding (current defences are ad hoc and are in a very poor condition)</p>	<table border="1" style="width: 100%; text-align: center; font-size: small;"> <tr><th colspan="2">Last Reviewed</th><td>Q2 2020/21</td></tr> <tr><th colspan="2">Last Revision</th><td>Q2 2020/21</td></tr> </table>	Last Reviewed		Q2 2020/21	Last Revision		Q2 2020/21	<table border="1" style="width: 100%; text-align: center; font-size: small;"> <tr><th colspan="2">Movement from prev Qtr</th><td>↔</td></tr> </table>	Movement from prev Qtr		↔	<table border="1" style="width: 100%; text-align: center; font-size: small;"> <tr><th colspan="2">Target Reduction Date</th><td>12 mths +</td></tr> </table>	Target Reduction Date		12 mths +	<table border="1" style="width: 100%; text-align: center;"> <tr><td colspan="2"><b>Andrew Gregory</b> (Gary Brown/ David Brain)</td></tr> <tr><td colspan="2"><b>Councillor Michael Michael</b> Clean Streets, Recycling and Environment</td></tr> </table>		<b>Andrew Gregory</b> (Gary Brown/ David Brain)		<b>Councillor Michael Michael</b> Clean Streets, Recycling and Environment	
Last Reviewed		Q2 2020/21																			
Last Revision		Q2 2020/21																			
Movement from prev Qtr		↔																			
Target Reduction Date		12 mths +																			
<b>Andrew Gregory</b> (Gary Brown/ David Brain)																					
<b>Councillor Michael Michael</b> Clean Streets, Recycling and Environment																					
Potential Impact(s)		What we've done/are currently doing to achieve the Residual Risk Rating		What we plan to do to meet target																	
<p>Continued coastal erosion along the coast threatening the Rover Way Traveller site and critical infrastructure including Rover Way and the Rover Way/Lamby Way roundabout</p> <p>Erosion to two decommissioned landfill sites, with risk of releasing landfill material into the Severn Estuary and having significant environmental impacts</p> <p>Flood risk to 1,116 residential and 72 non-residential properties over 100 years, including risk to life, property, infrastructure and services</p> <p>N.B. the predicted rates of erosion threaten the Rover Way Travellers Site and the adjacent electrical substation within 5 years, and further release of large volumes of unknown tip material from the Frag Tip into the Severn Estuary.</p>		<p><b>Incident management arrangements</b> are in place, which whilst not preventative, represent a level of emergency management for a flood and coastal erosion risk event occurring in a significant storm event.</p> <p><b>Coastal Defence Scheme:</b></p> <ul style="list-style-type: none"> <li>The Flood Risk Management Team are undertaking detailed design for the coastal defence scheme.</li> <li>The necessary works are holistic and cannot be phased. Therefore the residual risk rating cannot be lowered until the completed construction of the coastal defence scheme in its entirety.</li> <li>The inundation risk will be improved by implementing the coastal defence scheme. The scheme will provide defence for a 1 in 200 year severe weather event, plus an allowance for climate change influence of 40%.</li> <li>The total costs associated with the Design, Early Contractor Engagement and Construction phases have been estimated at £10.9m (Welsh Government 75% funding = £8.2m and CCC 25% funding = £2.7m)</li> <li>Formal application has been submitted to Welsh Government (WG) under the WG Coastal Risk Management Programme and development of the Detailed Design and Full Business Case (FBC) for the coastal defence scheme was programmed for completion in May 2020, however this has been impacted by Covid-19.</li> <li>Ground Investigation commenced February 2020. Due to Covid 19 restrictions, ground investigations were postponed during March 2020.</li> <li>Work ongoing with Emergency Management to formulate interim measures.</li> </ul>		<p>We will be designing &amp; delivering an effective coastal flood protection scheme as a matter of priority.</p> <p>Detailed design and full business case ongoing</p> <p>Keysteps:</p> <ul style="list-style-type: none"> <li>Completion date for detailed design and Full Business Case (FBC) anticipated late 2020 (TBC following review of the Ground Investigation and the delays related to Covid 19).</li> <li>Full Business Case to be submitted to Welsh Government for approval &amp; funding confirmation. Detailed design has commenced following completion of the GI.</li> <li>Tender scheme promptly following support from Welsh Government. Contract will be developed as part of detailed design process to support tender process.</li> <li>Anticipated construction starting Autumn 2021, subject to the above, with completion 2023.</li> </ul>																	
Type(s) of Impact		Linked Risks		Key Indicators / Measures used to monitor the risk																	
<ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Health</li> <li>Reputational</li> <li>Financial</li> </ul> <ul style="list-style-type: none"> <li>Strategic</li> <li>Service Delivery</li> </ul>		<p>Climate Change risks</p>		<ul style="list-style-type: none"> <li>Award of contract for detailed design and Full Business Case - achieved</li> <li>Completion of detailed design and Full Business Case by May 2020 &amp; submitted to WG</li> <li>Delivery programme of coastal protection scheme</li> </ul>																	

# Waste Management

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)									
<p>Failure to deliver cost effective compliance with waste legislation including statutory recycling targets.</p>	 <p style="text-align: center;"><b>B1</b></p>	 <p style="text-align: center;"><b>B2</b></p>	 <p style="text-align: center;"><b>C2</b></p>	<p><b>Sarah McGill</b> (Matt Wakelam)</p>	<p><b>Councillor Michael Michael</b> Clean Streets, Recycling and Environment</p>								
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Last Reviewed</td> <td>Q2 2020/21</td> </tr> <tr> <td>Last Revision</td> <td>Q2 2020/21</td> </tr> </table>	Last Reviewed	Q2 2020/21	Last Revision	Q2 2020/21	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Movement from prev Qtr</td> <td style="text-align: center;">↔</td> </tr> </table>	Movement from prev Qtr	↔	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Target Reduction Date</td> <td>12 mths +</td> </tr> </table>	Target Reduction Date	12 mths +		
Last Reviewed	Q2 2020/21												
Last Revision	Q2 2020/21												
Movement from prev Qtr	↔												
Target Reduction Date	12 mths +												
	<b>What we've done/are currently doing to achieve the Residual Risk Rating</b>			<b>What we plan to do to meet target</b>									
	<p>Progress discussions with Welsh Government on operational programme of improvements and recycling in Cardiff to demonstrate how Cardiff will be proceeding to meet statutory targets.</p> <p><b>Wider Governance &amp; Compliance</b></p> <ul style="list-style-type: none"> <li>Targeted internal audits identifying and improving governance and control across the service area (ongoing)</li> <li>Introduction of improvements in weighbridge and data systems holding data on waste movements, to improve data management and ease collation of data (ongoing)</li> <li>Cardiff Council has commenced a programme working in partnership with Welsh Government to develop a new Recycling Service Strategy and Implementation Plan (ongoing)</li> </ul> <p><b>Development of recycling plan for optimising resources including considerations of statutory fines.</b></p> <ul style="list-style-type: none"> <li>Reviewing and benchmarking tonnages / recycling levels / costs of disposal for Cardiff compared to Welsh Authorities and United Kingdom, to identify areas requiring further review to support the opportunity to improve recycling levels (ongoing)</li> <li>Media and communications taking place across Cardiff with focus on key areas for recycling improvement (ongoing)</li> <li>Improving use of In-Cab system to improve service delivery through real time technology, optimisation of routes and identification of waste contamination (complete)</li> <li>Commencement of new education and enforcement programme to reduce contamination in recycling and garden waste (ongoing)</li> <li>Cabinet Report prepared for Cabinet on 23rd January 2020 'Education campaign to support improving recycling performance' to implement a strategy of education in Cardiff relating to contamination of recycling (the pink sticker campaign) and segregation of recycling at Household waste Recycling Centres (ongoing)</li> </ul> <p><b>Recycling Development</b></p> <ul style="list-style-type: none"> <li>The Council's Recycling Strategy is the subject of regular review. A new strategy is currently under development for implementation by March 2021.</li> <li>Robust analysis and review of business cases relating to the following waste collection &amp; disposal operations:                             <ul style="list-style-type: none"> <li>Bottle and Glass expansion across the City (complete and supplemented by modelling work with WG)</li> <li>Hygiene (Absorbent Hygiene Products) from Municipal Solid Waste to Recycling (ongoing project with WG)</li> <li>Trade Waste (ongoing)</li> </ul> </li> </ul> <p><b>Covid-19 Lockdown</b> meant between 30th March 2020 and 31st May 2020 waste collections were collected as a single stream where residual, recycling and food waste was collected weekly and sent to Energy from Waste. The reason for the decision was to limit exposure to both residents and workforce to the impacts of Covid-19. However, the approach has impacted Qtr1 recycling performance to 42.51% compared to 62.57% the previous year. Overall recycling performance for 20/21 is highly unlikely to recover.</p> <ul style="list-style-type: none"> <li>Recycling Centres are being managed via a booking system, and the replacement of residual waste and recycling waste skips with a non-recycling skip, supported by new procedures, has meant recycling performance at centres has increased from 70% to 90%.</li> </ul>			<ul style="list-style-type: none"> <li>City wide glass roll-out to be reviewed as part of the Recycling Services Strategy and Implementation Plan. (complete)</li> <li>Targeted and tailored intervention to deal with contamination in hot spot areas across the City (ongoing)</li> <li>Further develop the new Recycling Strategy for Cardiff. This will set out the Council's long-term objectives over the next 10 years and consider economic, social and environmental aspirations, in order to ensure Cardiff is one of the leading cities in the world for recycling. (ongoing)</li> <li>Pink Sticker Campaign roll-out across Cardiff to commence Qtr 2 (on hold due to Covid 19)</li> </ul> <p><b>Wider Governance &amp; Compliance</b></p> <ul style="list-style-type: none"> <li>Senior Management to have ongoing regular engagement and discussions with WG on Cardiff's Recycling Strategy and compliance with the WG Blueprint. Work is now progressing on looking at models for Cardiff (completed May 2020 - modelling showed only a 1.2% increase in recycling performance with a kerbside model rising to 2.7% with a move to 3 weekly residual collections.)</li> <li>A further phase of work is required working with Welsh Government to look at the impacts on recycling performance in relation to:                             <ul style="list-style-type: none"> <li>Trade waste and new legislation</li> <li>Flats</li> <li>Recycling Centres</li> </ul> </li> <li>Outcome will be to deliver a road map supported by Welsh Government on improving Cardiff's recycling performance</li> </ul>									
<b>Potential Impact(s)</b>	<p><b>Financial</b></p> <ul style="list-style-type: none"> <li>Penalties and loss of grant support</li> <li>Continuing financial costs to service</li> </ul> <p><b>Legal &amp; Regulatory</b></p> <ul style="list-style-type: none"> <li>Failure to comply with EU recycling waste directive, leading to sanctions, penalties or interventions</li> </ul> <p><b>Strategic/ Reputational</b></p> <ul style="list-style-type: none"> <li>Reputational consequence with citizens and key stakeholders</li> </ul>												
<b>Type(s) of Impact</b>	<b>Linked Risks</b>		<b>Key Indicators / Measures used to monitor the risk</b>										
<ul style="list-style-type: none"> <li>Reputational</li> <li>Legal &amp; Regulatory</li> <li>Financial</li> </ul>			<ul style="list-style-type: none"> <li>Monthly monitoring recycling % from waste data flow</li> <li>Monthly tonnage monitoring</li> <li>Monthly financial monitoring in each area of waste</li> </ul>										

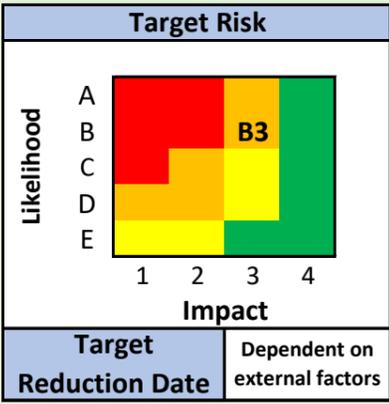
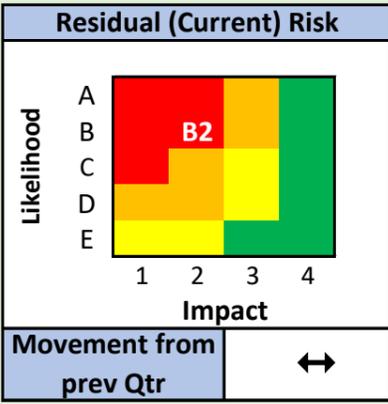
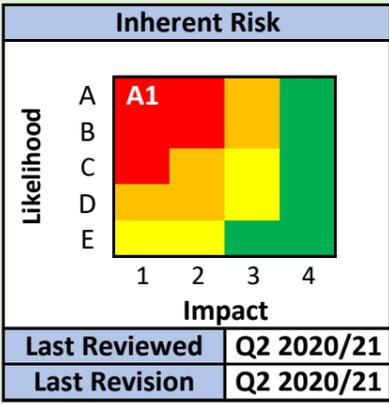
# Brexit

**Description**

The risk that Brexit (and any subsequent decisions) will create severe disruption to the City and hinder its ability to continue to deliver effective services and maintain community cohesion.

On 31 January 2020, the UK legally ceased to be a member of the EU. There will now be an 11 month transition period up until the end of December 2020, by which time both sides have stated they hope to have agreed a trade deal. Throughout the transition, whilst the UK will no longer be represented in the EU's political institutions, the UK will continue to be subject to EU rules and remain a member of the single market and customs union.

Following the 30 June 2020 deadline, the UK did not exercise an option to extend the transition period. If a UK-EU free trade deal has not been agreed by 31 December 2020, the risk remains that we could once again be facing the prospect of a 'no-deal' exit of sorts. Whilst the Withdrawal Agreement has been ratified, in such a 'no-deal' scenario, the UK would have to trade with the EU on World Trade Organisation terms, with most UK goods subject to tariffs. There would also be a range of other implications of the UK leaving the EU without a deal, which the Council has already undertaken research into and taken steps to prepare for.



**Risk Owner(s)**

**Paul Orders**  
(Senior Management Team)

**Councillor Huw Thomas**  
Leader  
(Brexit)

**What we've done/are currently doing to achieve the Residual Risk Rating**

On 23 July 2020, the Council's Resilience Unit coordinated a Council-wide exercise to update the Council's Brexit Issues Register. Each Directorate Reviewed its wider Brexit preparedness, noting the impact of COVID-19, along with refreshed mitigative actions, considered and noted any additional risks not already identified, along with the appropriate mitigation and focused on supply chains and ensuring continuity of supply

The Resilience Unit concluded the work represented a balanced and fair assessment but that the Council has to be alert and ready to respond, particularly if/ when 'no-deal' becomes a definitive position. Mitigative actions have been identified by Directorates for each issue, with a continued focus on protecting the community, especially the most vulnerable.

**What we plan to do to meet target**

Should 'no-deal' become a definitive position, nominated Brexit Liaison Officers will be asked to undertake preparatory activity ahead of the end of the transition period. This will include a further review of their Directorate's Business Continuity Plans in the face of the challenges ahead, as well monitoring and regularly updating the Brexit Issues Register.

Should a deal be confirmed, work will be undertaken to understand its implications, before putting in place appropriate preparations. For instance, irrespective of the outcome of negotiations between the UK and EU, traders will face new customs controls and processes.

To report real-time Brexit disruption requiring an immediate response, which is most likely following the end of the transition period on 31 December 2020, Duty Silver Officers will be asked to use the command and control system already in place, as outlined in the Council's Major Incident Plan. The Council will continue to monitor the major developments and focus on areas where local action is required:

**Citizens and Community Cohesion**  
The Council will continue to promote the EU Settlement Scheme in communities with high levels of EU migrants. Information on the scheme is being provided to community groups in relevant community languages. Engagement is ongoing with Welsh and UK Governments to ensure an alignment of messaging and of advice on support pathways available.

**Short-term Economic Contraction**  
The Council's Economic Development Service have considered the local economic implications of a no-deal Brexit and have developed clear asks of Government to support the economy in the event of a severe economic contraction (estimated at around 8% of per head GDP by Welsh Government Analysis). This will be re-considered in light of COVID-19 and the Council's Restart, Recovery and Renew response framework.

**Potential Impact(s)**

**Immediate Issues Identified:**

- Impact on Council supply chain
- Citizens and Community Cohesion
  - Implementing the EU Settlement Scheme
  - Increases of tension/ hate crime
- Emergency Management
  - Responding to civil contingencies/ major disruption (potential for protests, food shortages, disruption to water supply (infrastructure) and fuel shortages)
  - Shortage/ loss of key supplies
- Short-term economic contraction
- Preparedness of local businesses for a no-deal Brexit.

**Medium to Long-term Issues Identified:**

- Labour Market and Council Staff
- Impact on Public Finances – Central Government and Welsh Government Analysis suggests that Brexit will have a larger impact than economic downturn of 2008, with close to a 8% drop in GDP.
- The future of regional funding (the future UK Shared Prosperity Fund)
- Investment, Trade and Industrial Strategies (including regulations)

**Linked Risks**

Business Continuity

**Key Indicators / Measures used to monitor the risk**

- High level economic indicators - GDP, GVA
- Unemployment levels, particularly in key services/sectors
- Hate Crime statistics
- Numbers enrolled in settlement scheme

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	<ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Partnership</li> <li>Community &amp; Environment</li> <li>Stakeholder</li> </ul>
--	--

# Performance Management

**Description**

The risk that the Council's Performance Management arrangements do not achieve their stated purpose.

Performance Management arrangements are essential for discharging statutory requirements, delivering the administration's priorities and ensuring Council core business is delivered effectively. Weak corporate performance management arrangements heighten the risk of poor performance, service failure, financial overspend or legal non-compliance going unidentified, unchallenged and unresolved.

The Council must therefore maintain a focus on the Key Performance Indicators it has identified within the Corporate Plan as a pointer to overall organisational success. The Council must also ensure that more granular indicators of performance- the Council's Core Data which is managed by individual Directorates- are established and monitored to provide more detailed insight into the drivers of corporate performance.

Changes to the Statutory Performance Requirements likely to emerge via the Local Government Bill must also be reflected within the Council's performance regime.

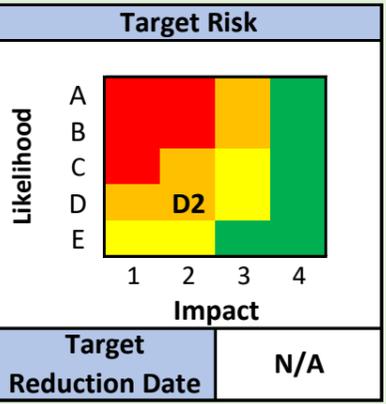
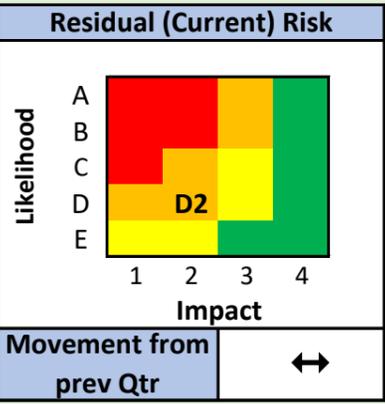
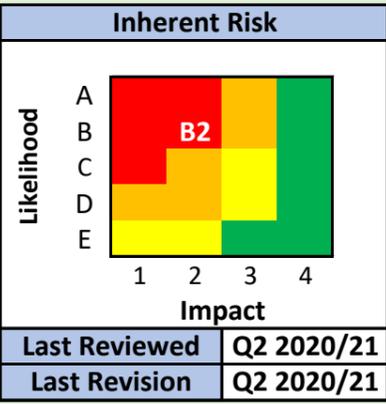
Page 340

**Potential Impact(s)**

- The strategic and corporate level changes do not have the intended impact because they are not fully embedded in operational practices
- Council unable to accelerate performance improvement as planned/desired

**Type(s) of Impact**

- Service Delivery
- Reputational
- Stakeholder



**Risk Owner(s)**

**Sarah McGill**  
(Gareth Newell)

**Councillor Chris Weaver**  
Finance, Modernisation and Performance

**What we've done/are currently doing to achieve the Residual Risk Rating**

**The annual Wellbeing Report for 2019/20 has been published and this includes a comprehensive account of the Council's response to the Covid-19 pandemic.**

**Further Strengthening of the Performance Regime**

The Council has reviewed its performance monitoring and reporting arrangements to streamline the information gathering process, produce fewer but more strategic performance assessments and strengthen the involvement of scrutiny. A recent internal audit of performance management also concluded that 2 areas of assessment were green and one area of assessment was amber green.

- The corporate performance management framework supports the effective management of corporate priorities and plans (Amber/Green)
- Performance is measured and monitored using required statutory and suitable local indicators and targets (Green)
- Performance reporting and oversight is timely, effective and meaningful (Green).

A response to the Audit recommendations has been agreed and these will be embedded in the forthcoming revisions to the performance management framework.

**What we plan to do to meet target**

Develop an updated Planning and Delivery Framework that responds to the new requirements set out in the Local Government and Elections Bill and the recommendations of the internal audit work.

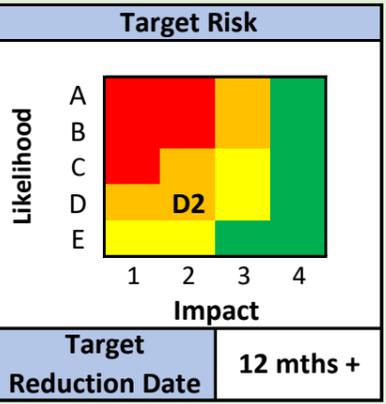
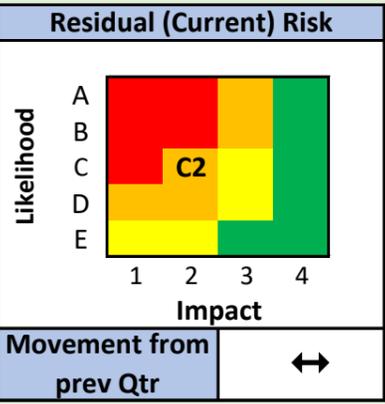
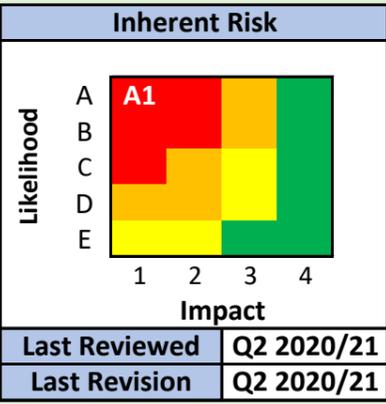
**Linked Risks**

**Key Indicators / Measures used to monitor the risk**

Quarterly monitoring of corporate plan indicators (108) provide a pointer to organisational health and corporate performance. Corporate Plan indicators are also risk assessed as part of the performance monitoring process.

## Budget Monitoring (Control)

**Description**  
 Failure to achieve the budget set, inclusive of budgeted spend and savings across Directorates, with increased use of emergency finance measures and the unplanned drawdown of reserves.



**Risk Owner(s)**

Chris Lee  
(Ian Allwood)

**Councillor Chris Weaver**  
Finance, Modernisation and Performance

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Clear financial procedure rules setting out roles and responsibilities for budget management are in place.
- The impact of the pandemic has led to significant financial support from Welsh Government in the form of Local Authority Hardship Claims.
- Hardship support in the form of compensating for additional expenditure incurred as a result of the pandemic response and compensation for loss of income expected from activities.
- Claim Process on a quarterly basis and is subject to review and potential audit post event.
- Claims for loss of income are adjusted for those costs that can be avoided. Range of forecasts amidst the uncertainty of the timescale for recovery in those activities for the rest of the financial year and beyond.
- The 2020/21 Directorate Month 4 report reported a directorate overspend of £5.076 million with an overall deficit position of £1.976 million.
- The Corporate Director of Resources, Chief Executive and Cabinet Members hold challenge meetings and these will continue throughout 2020/21.
- Full financial monitoring process is in place for month 3 to 11 of the financial year including achievement of budget savings with months 3 to 6 completed.

**What we plan to do to meet target**

**2021/22 and the Medium Term**

- Regular challenge session meetings held with directors, corporate directors and Chief Executive in order to ensure there is a response to both individual directorate positions and the overall Council position. Focus on areas of lost income or additional expenditure and understanding the potential impact on future periods.

**Potential Impact(s)**

- Inability to balance spend against budget, for the financial year
- Requirement to implement emergency measures to reduce spending during the financial year thus adversely impacting on ability to meet corporate plan objectives
- Requirement to drawdown from General Reserves at the year end

**Type(s) of Impact**

- Service Delivery
- Reputational
- Legal
- Financial
- Stakeholder

**Linked Risks**

Financial Resilience

**Key Indicators / Measures used to monitor the risk**

Monthly Directorate Monitoring reports detailing likely outturn position and performance against savings accepted

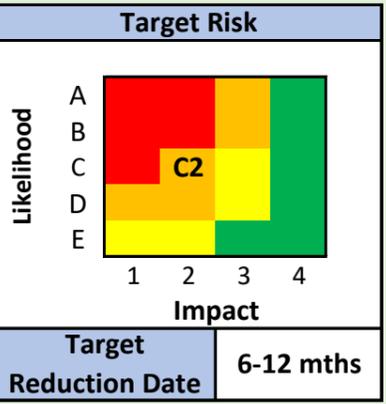
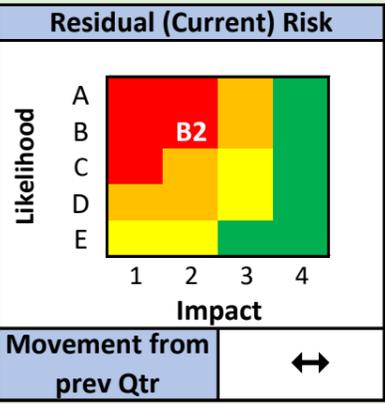
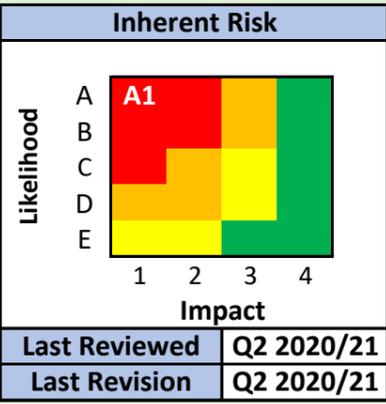
- Review of use of earmarked reserves and balances - Half Yearly
- Amount of Hardship Support claimed successfully

# Financial Resilience

**Description**

Failure to deliver a balanced annual budget and a fully informed Medium Term Financial Plan which would significantly weaken the financial resilience of the Council.

The current outlook is that there is a Budget Gap of £73 million for the period 2021/22 to 2024/25.



**Risk Owner(s)**

**Chris Lee**  
(Ian Allwood)

**Councillor Chris Weaver**  
Finance, Modernisation and Performance

**What we've done/are currently doing to achieve the Residual Risk Rating**

**2020/21 and Medium Term**

- Final Settlement received 25 February 2020 - two days before council approval of budget.
- The 2020/21 Budget monitoring position of Month 4 highlights a significant overspend on Directorate budgets.
- Monitoring of the budget realignment of services to provide assurance of delivery of services within budgets allocated. This is in partnership with directorates.
- The Council regularly reports in relation to its financial performance and monitoring
- The Wales Audit Office identified that the Council has a transparent and effective savings approach which supports financial resilience being achieved
- A financial snapshot is used to report the financial resilience of the Council and is reviewed 3 times a year and reported at Budget Report (Feb), Budget Strategy (Jul) and to Audit Committee.

**What we plan to do to meet target**

**2021/22 and the Medium Term**

- Continue work on establishing the financial implications to services both in the short, medium and long term as a result of the impact of the Covid 19 crisis.
- Work in partnership with Directorates to ensure that budgets allocated for key services remain appropriate and sustainable. Key focus on those areas where overspends being reported in 2019/20
- Continue to maintain close alignment with objectives of the Corporate Plan in order to ensure resources are allocated appropriately and that longer term financial savings are developed in enough time to be realised in the medium term.
- Continue to refresh assumptions at key stages as relevant information becomes available.

**Potential Impact(s)**

- Risk of failing to meet statutory obligations and that service delivery impacted due to uncertainty in the budget planning process.
- Risk that settlement figures will not be as anticipated giving an element of uncertainty to any proposals from Cabinet during public consultation and beyond.
- Risk that savings identified as part of business as usual and efficiencies have not been robustly reviewed for achievability and will not deliver as planned.
- Risk that financial constraints and budget proposals result in unintended consequences such as increased instances of non-compliance and financial impropriety.
- Risk that annual budget settlement frustrates medium / longer-term planning and that the cycle does not integrate with other business cycles and vice versa.
- Risk that Medium Term Savings are not identified in a coherent, strategic way which impacts on service delivery.
- The risk that the Council will not be able to react to adverse situations through a combination of poor imprudent planning and significant challenges such as increasing demands for services such as social services, education, roads etc.

**Linked Risks**

Budget Monitoring (Control)

**Key Indicators / Measures used to monitor the risk**

Financial Snapshot which highlights historical and current performance on performance against budget, performance against savings against budget, level of borrowing, financial ratios Work being undertaken with SMT to consider the savings opportunities over the medium term 2020/21 - 2023/24.

- Outturn vs Budget: Main budget lines under or overspend as a % of budgeted expenditure.
- Delivery of planned savings: Total (£) unachieved planned savings as a % of total (£) planned savings.
- Use of reserves: 1) Ratio of useable reserves to Net Revenue Budget (NRB), 2) Amount of useable reserves used to balance budget as % of NRB.
- Council tax: 1) Council tax and other income as % of NRB, 2) Council tax collection rates (in-year actual).
- Borrowing: 1) Total commercial investment income as % of total net general fund budget, 2) Total (£) commercial investments and (£ plus%) amount funded from borrowing, 3) Borrowing related to commercial investments as % of General Fund total borrowing, 4) Capital interest costs and MRP as a proportion of NRB.
- Performance against Budget Timetable.
- Frequency / timeliness of engagement with SMT/Cabinet.
- Proportion of Savings Proposals in Realised or at Delivering stage.

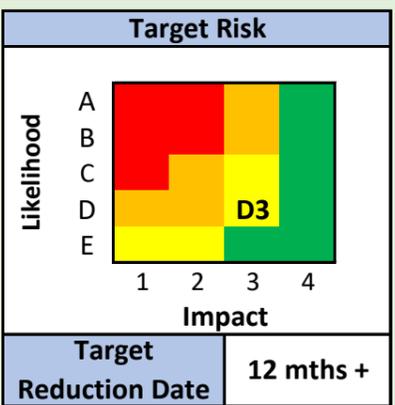
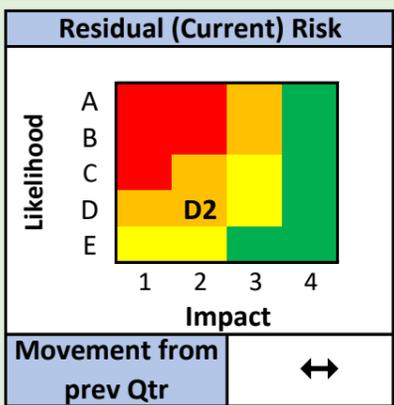
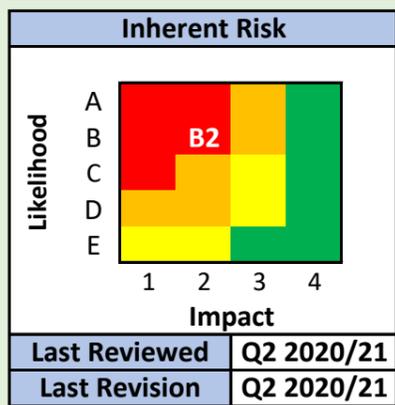
**Type(s) of Impact**

- Service Delivery
- Reputational
- Legal
- Financial
- Stakeholder

# Fraud, Bribery & Corruption

**Description**

Fraud, financial impropriety or improper business practices increase as internal controls are weakened as resources become severely stretched.



**Risk Owner(s)**

**Chris Lee**  
(Ian Allwood)

**Councillor Chris Weaver**  
Finance, Modernisation and Performance

- What we've done/are currently doing to achieve the Residual Risk Rating**
- The Council communicates a zero tolerance approach to fraud, bribery and corruption.
  - Regular review of relevant policies and procedures e.g. the Fraud, Bribery and Corruption Policy, Money Laundering Policy and Disciplinary Policy.
  - Financial Procedure Rules and Contract Standing Orders and Procurement Rules and training.
  - National Fraud Initiative data matching exercises in collaboration with the Cabinet Office and Wales Audit Office.
  - Receipt and dissemination of fraud intelligence alerts from law enforcement agencies.
  - Regular reports to the Section 151 Officer and Audit Committee and the Chief Executive.
  - Audit Committee review of the risk management, internal control and corporate governance arrangements of the authority.
  - Independent assurance from Internal and External Audit on the effectiveness of governance, risk and control.
  - Briefings developed and disseminated to Schools on fraud and control risks.
  - Cardiff Manager Programme includes session on risk management and compliance / control.
  - Provision of disciplinary management information on DigiGOV.
  - Mandatory disciplinary e-learning module for all managers to complete and a programme of mandatory e-learning modules and training for Disciplinary Hearing Chairs, Investigating Officers and Presenting Officers.
  - A Fraud Publicity Strategy is in place, to publicise the Council's approach to counter fraud work / sanction activity and explain the roles and responsibilities of key parties.
  - Counter-Fraud and Corruption Strategy approved by Cabinet in July, and associated Fraud Awareness eLearning was rolled out to all pc users commencing July 2019.
  - Face-to-Face Fraud Awareness training delivered to officers and headteachers in quarter 3 and school governors in quarter 4 2019/20.
  - Participation in International Fraud Awareness week commenced in November 2019, and annual commitment to participate going forward.
  - Investigation Team participation in SMAS triangulation exercise, commenced in quarter 3 2019/20.
  - Investigation Team provision of investigation and counter-fraud advice, guidance and support to Directorates as required.
  - SMT participation in fraud tracker and assessment commenced January 2020, with commitment to full exercise at least annually.

- What we plan to do to meet target**
- Monitoring employees at work policy and process for undertaking online investigations being reviewed.
  - Policy updates underway in respect of money laundering, to include a provision of targeted training.
  - Monitoring and reporting completion rates of mandatory fraud awareness training.

**Potential Impact(s)**

- Increase in frauds and losses to the Council
- Reputational risk as more frauds are reported
- Increased time investigating suspected fraud cases impacting on capacity

**Type(s) of Impact**

- Service Delivery
- Reputational
- Legal
- Financial
- Stakeholder

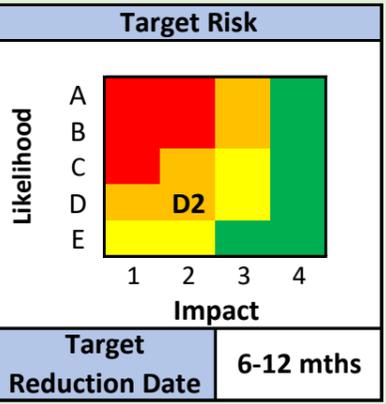
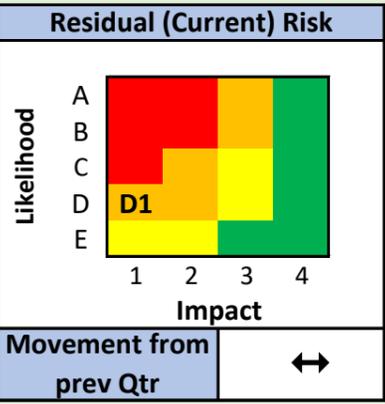
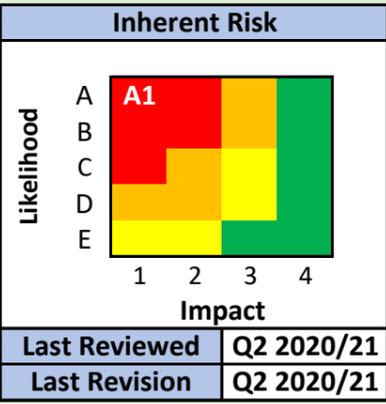
**Linked Risks**

- Key Indicators / Measures used to monitor the risk**
- Adherence to the NFI Security Policy and annual completion of compliance forms
  - Mandatory Fraud Awareness eLearning completion and face-to-face attendance rates
  - Delivery of Fraud Awareness week campaign
  - Delivery of Policy updates
  - Delivery of mandatory investigating officer training and the note taker training
  - Criminal investigations conducted on behalf of Directorates
  - Provision of timely investigation and counter-fraud advice, guidance and support to Directorates as required

# Information Governance

**Description**

Information handled inappropriately leaves the Council exposed to intervention and financial penalties issued by the Information Commissioner (ICO). This includes information held by Cardiff Schools.



**Risk Owner(s)**

**Chris Lee**  
(Dean Thomas)

**Councillor Chris Weaver**  
Finance, Modernisation and Performance

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Suite of Information Governance Processes, Policies and Strategies in place and annually updated.
- Gold level of assurance as part of Cyber Security Plus ISAME Accreditation process in March 2019.
- Information Governance Training Strategy in place and training provided to staff with access to electronic personal data
- Processes established through procurement and ICT acquisition processes for ensuring Data Protection Impact Assessments are completed if personal data is being processed, including Data Processing Agreement with third party contractors.
- A corporate Information Asset Register is held which details personal data assets held by each Council directorate.
- Service Level Agreements in place where Cardiff Council is the Data Controller for regional services
- Advice, guidance and support is provided to all Cardiff Schools.
- Corporate Retention schedule in place and updated annually in line with any legislative changes.
- Information Governance Maturity Model established to monitor risks against areas of information governance to feed into corporate risk status.
- The Digitalisation of Paper Records Strategy and associated business process changes is in place.
- Data Protection e-learning training released with an extended period for completion during 2020. Compliance is monitored and reported to Directors.
- An Information Governance Report is provided to Information Governance & Security Board on a quarterly basis. This sets out performance information in respect of data protection and information request compliance for each directorate.
- National and Regional Information Governance Agreements in place in respect of Covid-19 data processes

**What we plan to do to meet target**

- Changes will be introduced in respect of managing data breach investigations, which will require services to provide information and evidence within set deadlines. This will help ensure that the Council meets targets for completing investigation reports and put support to Insurance in the event of any compensation claims being submitted
- Monitoring the position in relation to International Transfers as a result of a potential no deal Brexit continues. Data flows have been established to enable any additional measures which may be required in line with any adequacy decision.
- Staff awareness of Information Governance to be provided to energise the importance of staff and managers' responsibilities for ensuring the services comply with corporate policies.
- Information Governance Champions Group to be established to provide support to directorate champions with ensuring compliance procedures and policies and maintaining directorate Information Asset Registers.

**Potential Impact(s)**

Leads to the Information Commissioner issuing notices of non-compliance

These could consist of:

- A "Stop Now" Order which would mean that no personal data could be processed by the Council in its entirety
- An Information Notice which would mean that a service would have to provide information in a very limited period thereby impacting on service delivery
- Undertaking which requires an Action Plan of Remedial Measures which would be subject to ICO Audit
- Enforcement Notice requires immediate improvement action to be put in place
- Financial Penalty up to £17.5 million for Higher Level Tier and £8 million for Lower Level Tier breaches of the Data Protection Act.
- Compensation unlimited liability claims for damages as a result of a data breach from individuals.

**Type(s) of Impact**

- Service Delivery
- Reputational
- Legal
- Financial
- Stakeholder

**Linked Risks**

**Key Indicators / Measures used to monitor the risk**

- Suite of IG Indicators
- No. of ICO correspondence
- No. of FOI / SAR Requests
- No. of individuals trained on GDPR modules

# Cyber Security

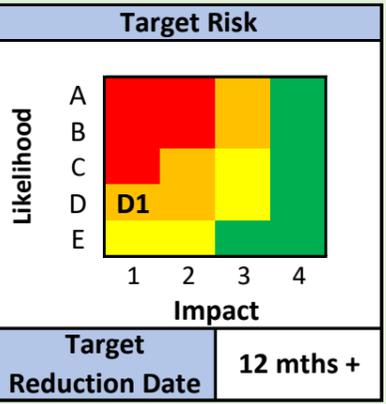
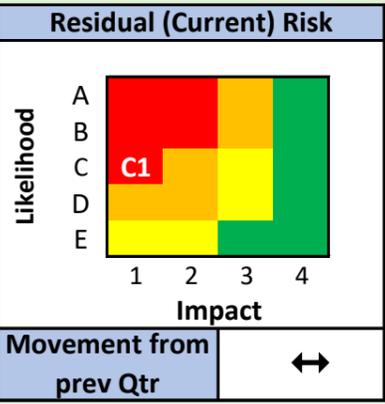
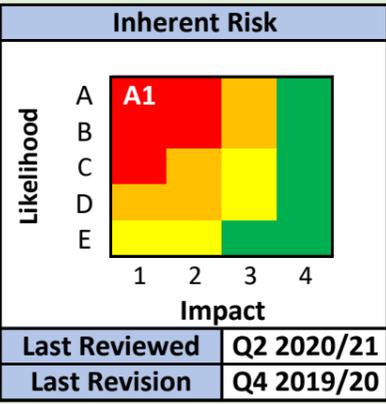
**Description**

There are 11 areas of potential risk within the National Cyber Security Centre cyber risk model. Of these, nine are assessed as well controlled within the Council

Two of the eleven areas of a Cyber Security assessment underpinning the corporate risk have been identified as high risk as follows:

**Monitoring** - the volumes of systems, applications and audit logs do not lend themselves to easily assess how and when systems are being used, leading to an ineffective response to deliberate attacks or accidental user activity

**Corporate Cloud Security** - 2018 Internal Audit identified contract, SLA and service management weaknesses in externally hosted services



**Risk Owner(s)**

Chris Lee (Phil Bear)

Councillor Chris Weaver  
Finance, Modernisation and Performance

**What we've done/are currently doing to achieve the Residual Risk Rating**

The principal controls for the high risk areas are as follows:

- Monitoring** - Log analysis is undertaken on a prioritised basis with incident reporting to ISB and discussed with IAO - risk of vulnerabilities could be further mitigated with additional resourcing for log monitoring - this is under continual review
- Corporate Cloud Security** - Maturing PIA & CIA process used to assess risks to data and technology solutions
- Independent assessment and certification of the council's IT security posture via the National Cyber Security Centre (NCSC) Cyber Essentials Plus scheme
- Independent assessment and certification of the Council's Information Governance (GDPR/Data Protection) posture via the ISAME Governance scheme, awarded at the highest level of Gold
- Staff Cyber Security training programme rolled out to all staff to give guidance on threats and how to spot

**What we plan to do to meet target**

- ICT and Information Governance (IG) Teams to continue to liaise with FM for physical security assurances and to promote an incident reporting culture.
- To ensure strong ICT security, monitoring and cloud security controls:
  - ICT lifecycle and notification targets are being monitored and managed through the 'ICT Platforms' risk actions
  - Collaboration between ICT and IG to develop and map current ICT system providers in phased development of an Information Asset Register
  - Privacy Impact Assessment / Cloud Impact Assessments to be reviewed to ensure compliance with the requirements of the General Data Protection Regulation (GDPR) Action Plan being managed by the Information Governance Team
  - Governance and management requirements to be formalised for periodic and systematic review of all ICT systems.
- SIRO to review / consider Cloud Infrastructure to ensure:
  - Assurance of effective governance and management
  - Resource, risk appetite and outcomes required
  - Education of business systems owners in risk and management of cloud based services.

**Potential Impact(s)**

The intent of cyber attackers includes, but is not limited to:

- financial fraud;
- information theft or misuse,
- activist causes to render computer systems intolerable and to disrupt critical infrastructure and vital services.

The impact of a cyber-attack / incident has the potential to involve the realisation of the risks associated with:

- An information governance breach (i.e. Stop Now Order, Information Notice, Enforcement Notice, Financial Penalty etc.)
- A business continuity incident – with a potential for major loss of service and legal, health and safety and financial implications.
- A financial / fraud related attack.

A malicious attack could result in loss of confidence from those transacting with the Council (reputation), as well as legal, asset, system, operational and financial implications.

**Linked Risks**

Information Governance

**Key Indicators / Measures used to monitor the risk**

- Threat intelligence from National Cyber Security Centre (NCSC), including national posture and guidance via the National Cyber Security Strategy/Programme
- Threats and risks highlighted by NCSC Cyber Security Information Sharing Partnership (CiSP), Cymru WARP (Warning, Advice and Reporting Point) and Welsh Government/WLGA
- General UK posture and issues raised in national and local media
- Number of compromises - breaches are monitored, investigated and reported back via Information Security Board and where applicable the ICO
- Monthly reporting of number of virus attacks via email blocked

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	<ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Stakeholder</li> </ul>
--	--

## ICT Platforms Unsuitable / Outdated

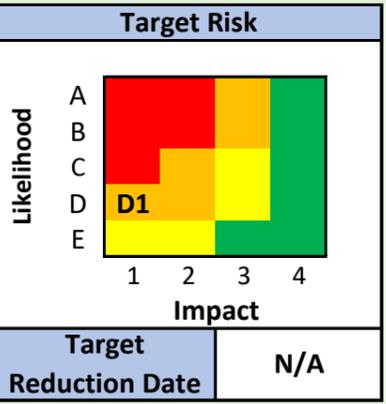
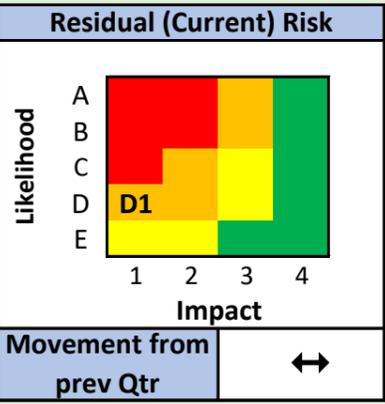
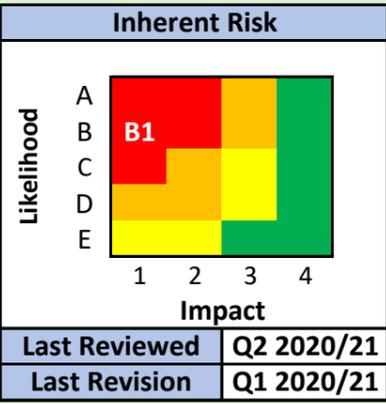
Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)									
<p>The ICT platforms (desktop, software, network, servers, and telephones) will not be able to support the technologies required by the corporate change programme and deliver effective service to the council, or will not provide a reliable service due to age and condition of equipment and systems.</p>				<p><b>Chris Lee</b> (Phil Bear)</p>	<p><b>Councillor Chris Weaver</b> Finance, Modernisation and Performance</p>								
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Last Reviewed</td> <td>Q2 2020/21</td> </tr> <tr> <td>Last Revision</td> <td>Q4 2019/20</td> </tr> </table>	Last Reviewed	Q2 2020/21	Last Revision	Q4 2019/20	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Movement from prev Qtr</td> <td style="text-align: center;">↔</td> </tr> </table>	Movement from prev Qtr	↔	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Target Reduction Date</td> <td>12 mths +</td> </tr> </table>	Target Reduction Date	12 mths +		
Last Reviewed	Q2 2020/21												
Last Revision	Q4 2019/20												
Movement from prev Qtr	↔												
Target Reduction Date	12 mths +												
	<b>What we've done/are currently doing to achieve the Residual Risk Rating</b>			<b>What we plan to do to meet target</b>									
	<ul style="list-style-type: none"> <li>Spending for renewal/upgrade of highest risk items, in particular firewalls, core servers/switches and external bandwidth is continually reviewed and reprioritised</li> <li>Migration of data to SharePoint online providing a cloud resilient and agile service</li> <li>Purchase of Extended Support to help keep legacy services covered for an additional year (2008)</li> <li>10 year hardware replacement programme created with costs estimates profiled annually</li> <li>Continued assessment of priorities for replacement – applications infrastructure and servers are the next priority</li> <li>Assessment of equipment required replacing to maintain PSN compliance</li> </ul>			<ul style="list-style-type: none"> <li>Development of lifecycle monitoring for operating systems and software platforms, and clearer customer engagement of upcoming deadlines</li> <li>Pilot leasing scheme within schools to be considered for corporate desktop estate</li> </ul>									
<p><b>Potential Impact(s)</b></p> <ul style="list-style-type: none"> <li>Loss of PSN services.</li> <li>Service delivery impacts from unreliable/unavailable ICT systems</li> <li>Cardiff seen as unable to deliver on aspirations</li> <li>Poor morale from frustrations with inability to deliver services.</li> <li>Potential for income losses from revenue collection impacts.</li> <li>Unable to meet delivery deadlines on both business as usual and transformation projects.</li> </ul>													
<p><b>Type(s) of Impact</b></p> <ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Financial</li> <li>Stakeholder</li> </ul>	<b>Linked Risks</b>			<b>Key Indicators / Measures used to monitor the risk</b>									
				<ul style="list-style-type: none"> <li>Annual independent testing of external and internal infrastructure via Information Technology Health Check (ITHC) for PSN compliance.</li> </ul>									

# Business Continuity

**Description**

Large scale incident/loss affecting the delivery of services.

The potential risk is that our most time sensitive activities are not sufficiently resilient and fail, following an incident which impacts on their delivery and that our incident management structure, used in response to internal incidents and external emergencies, also fails in response to an incident.



**Risk Owner(s)**

Chris Lee

Councillor Huw Thomas  
Leader

**What we've done/are currently doing to achieve the Residual Risk Rating**

- The Council has a BCM Champion who sponsors BCM at a strategic level
- We have an approved Business Continuity Policy which is aligned to ISO22301
- BCM toolkit is now available on CIS
- The Council employs a Business Continuity Officer who is a qualified ISO22301 lead auditor
- The Emergency Management Unit has developed an Incident Management Plan (Cardiff Council's Emergency Management Plan) to ensure alignment with ISO22301. This was fully updated in March 2019.
- The Council has a 24 hour Incident Management structure for Gold and Silver Officers.
- Cardiff Council is a member of the Core Cities Business Continuity Group
- Internal Audit completed an audit of the Business Continuity Risk in September 2018 and the assurance statement was "Effective with opportunity for improvement"
- Q4 of 2019/2020 saw the council undertake a full review and update of the activities delivered across the council allowing us to focus on the resilient delivery of key functions as we planned and responded to the COVID19 threat. This review was delivered at the Strategic Level.
- Each Directorate was tasked with reviewing and updating their key business continuity plans in preparation for the emerging COVID19 threat. Each Director/Corporate Director was responsible for ensuring this work was undertaken fully and properly. The existing Business Continuity work provided a solid foundation to our response to the COVID19 threat.
- The full corporate incident management team was activated in early March.
- The Council worked positively at a Local Resilience Forum(LRF) level with partners supporting a wider Wales response to the COVID19 threat. This included daily reporting and escalation of key issues to the LRF.
- Areas were forced to change to a far more agile way of operating with our core ICT requirements changing to support far more agile/home working. The mode of delivery worked exceptionally well and provides the potential for longer-term resilient agile working in response to the ongoing COVID19 risk, in addition to positively supporting other aims and corporate risks.
- Staff across the council adapted at speed and have worked incredibly hard to deliver key services in new ways, in addition many staff changed roles to support the resilient delivery of key services and new asks on the council to keep the public safe.
- Officers are continuing to plan and prepare for the potential impacts of Brexit and a resurgence in the pandemic going into the autumn and winter of 2020 and spring of 2021.

**What we plan to do to meet target**

- Work with ICT to ensure our core infrastructure is as resilient as possible and able to support additional agile working capacity.
- Work with the teams involved with looking at the potential of using alternative delivery models for council services. Identifying risks associated with alternative delivery models for specific services and recommend potential risk management solutions for implementation, to protect the delivery of our most critical services.
- The Business Continuity Officer is working to develop and enhance individual Directorate response capability to ensure Directorates are in a stronger position to respond to incidents which could impact on the Council and our most time sensitive activities
- The BC officer is continuing a review of 4x4 resources across the council to support our response capability to deal with the potential of winter storms.
- The BC officer along with the Resilience Unit are continuing to ensure that corporately we are able to respond to the COVID19 threat and the ongoing risk including of second and third waves until the threat of the pandemic has fully dissipated.

**Potential Impact(s)**

- Health and Safety** – potential impact on staff and on the public relying on our most, time sensitive, critical services
- Legal action** -Failure of key services could lead to Legal action against the council
- Financial** - Failure of key services could led to significant financial cost both in terms of Ombudsman action and Enforcement action from regulatory bodies, as well as individual legal action against the corporate body where service failure leads to legal action against us from private claimants
- Reputational** - Impact on key services to the public could lead to significant reputational damage to the organisation
- Stakeholder** – Impact on key stakeholders as result of failure
- Service delivery** – Potential significant impact on service delivery to the public, impact of key services could lead to significant impacts to the public and the corporate body un delivering its services

**Type(s) of Impact**

- Service Delivery
- Reputational
- Legal
- Financial
- Health & Safety
- Stakeholder

**Linked Risks**

Brexit Risk

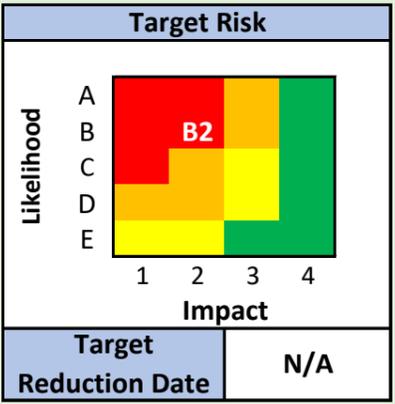
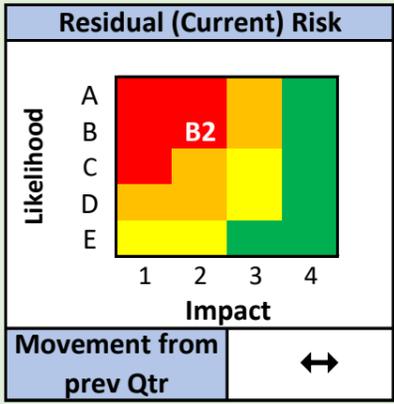
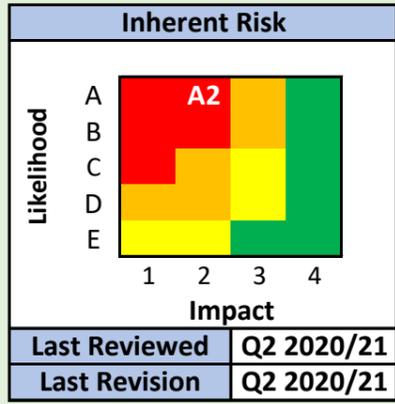
**Key Indicators / Measures used to monitor the risk**

The Red activity BC plan status is reviewed on a quarterly basis via a report to SMT after the CRR submission. Additionally the risk is managed as part of the Corporate Risk Management process via the CRR returns and the BC risk is also audited by Internal Audit . The last Internal Audit of the Business Continuity Risk was in in 2018.

# Welfare Reform

**Description**

That the Council cannot meet its statutory obligations with the increased demands and reduced budgets placed upon it by the Welfare Reform including: Universal Credit, further reduction in Benefit Cap and size restrictions for social tenants. The potential impact of these changes on rent arrears, homelessness and child poverty make these changes a significant risk. The removal of the DWP funding that paid for digital and budgeting support across the city will potentially increase the problem, although currently council reserves are being used to mitigate this.



**Risk Owner(s)**

**Sarah McGill**  
(Jane Thomas)

**Councillor Lynda Thorne**  
Housing & Communities

**Potential Impact(s)**

- Benefit claimants are priced out of the private rented sector market
- Private landlords stop renting to benefit claimants
- Private landlords leaving the rental housing market
- Social housing rents become unaffordable to some claimants, in particular those with large families
- Increased homelessness and demand for temporary accommodation – increased numbers seeking help with homelessness due to loss of private sector accommodation has already been seen.
- Increased rough sleeping
- Increased rent arrears, increased evictions - The impact on Council tenant rent arrears has already been considerable and is having an on the HRA, this will continue to increase as more tenants move to Universal Credit.
- Redeployment / Severance for housing benefits staff
- Changing demands on Council stock resulting in increased voids and/or undersupply of smaller properties
- Increased council rent arrears could impact on HRA and lead to barriers to building additional affordable housing
- LA less likely to pre-empt those who are going to be affected by changes and therefore unable to put mitigation steps in- This has already had a negative impact on the number of families where contact can be initiated by advice teams to families who have been affected by the benefit cap.
- Increase in poverty and child poverty, potentially an increase on demand of social services

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Communities staff continue to work closely with private landlords and advice agencies to mitigate wherever possible the reduction in benefit and prevent eviction. The new Landlord portal will be operational
- Discretionary Housing payments are being used to top up the benefit claims of those most affected by the changes and to pay rent in advance and bonds to help tenants to move accommodation where necessary.
- Housing Options service have developed additional support to help move families and vulnerable adults into private sector housing with a guarantor agreement to help mitigate the risk of financial loss that landlords fear.
- Housing Options service have created additional help for those on low incomes but not on benefits to access an interest free loan to pay for bond, rent in advance and moving costs. This also helps with financial inclusion as the clients will open up a savings account with the credit union and have a lump sum saved by the time the loan is repaid.
- Housing Options service are working with third sector partners to help clients move into settled accommodation in the private rented sector, primarily for single people who have lived in supported accommodation.
- Digital and budgeting Support is being given to claimants to help them respond to the changes, although funding has been stopped for this, so the Council is using its reserves to provide this service, the sustainability of this is therefore in question.
- A streamlined process is in place for re-housing tenants who need to downsize as a result of the social housing size restrictions. DHP is being used to pay removal costs and to cover shortfall while tenants are waiting to move.

Welfare Liaison team within the housing service is in place to assist tenants affected by the changes. Work has been carried out to identify those affected by the Benefit Cap and to advise them accordingly and to identify the most vulnerable families and award DHP.

- DHP process has been reviewed to ensure that all those who request a DHP are given budgeting, income maximisation and debt advice
- Universal Credit full service has commenced in Cardiff. Despite additional resources put in place rent arrears for council tenants have risen significantly since the change was implemented. The Welfare Liaison team work closely with tenants to mitigate the impact of the change.
- The Money Advice Team is providing comprehensive advice services for those affected by Welfare Reform and this has been rolled out across the city in Community Hubs and foodbanks.
- The Inclusive Growth Board and subgroups are coordinating multi-agency activity and developing appropriate interventions during a difficult transition period for many people affected.
- Briefings continue to be provided to Members on Welfare Reform and further information is sent as appropriate.
- Digital inclusion training and Universal Credit Support has been rolled out across all the new Community Wellbeing Hubs.
- Into Work Services are providing one to one mentoring support as well as light touch help across the city to help people get back to work or to upskill in their current roles.

**What we plan to do to meet target**

- Further additional resource has been agreed for supporting council tenants following the implementation of Universal Credit Full Service as rent arrears have increased significantly, staff have been recruited to assist with this and the new team is working well. Rent arrears procedure has been reviewed to include a more preventative and flexible approach and more assistance for more vulnerable tenants. After an initial sharp increase in rent arrears, the rate of increase has stabilised. This will be monitored over the coming months.
- Work has being undertaken to cost the potential risks of Universal Credit to the HRA and this will continue to be updated as more information is known.
- Regular meetings are held with social housing providers to monitor and improve processes.
- DHP spend is being monitored carefully. Expenditure for 19/20 will continue focusing on the most vulnerable individuals, helping people with the transition into work and mitigating the risk of homelessness.
- Services for private landlords are being further developed to help prevent them withdrawing from the market.
- Increase in Prevention staff to work with clients at risk of homelessness. Service can be provided from a partner building or in a client's home to increase engagement.
- In depth assessments to be completed at point of presentation to include a financial statement which will allow discussion to be had around possible expenditure concerns
- Attendance at monthly meetings to discuss clients affected by Welfare Reform in order that early support can be offered.
- Increase in Private Rented Sector Housing Solutions Team to obtain affordable private rented sector accommodation in order to assist clients to move quickly to avoid accruing higher rent arrears.
- Expansion of the Private Rented Sector Housing Solutions Team to include a dedicated person of contact for landlords. This will mean that any issues can be raised at the earliest stage and support provided to try to prevent any issues which may lead to homelessness.
- Dedicated phone line for landlords will mean easier contact with above team.
- a new Advice Team is now in place within the Housing Options Service to assist clients and landlords and to ensure that help available is promoted. This will include an online messaging service making the Service accessible to a wider range of clients.
- Digital and budgeting support available from Into Work and Money Advice on a Saturday for the first time for those who are claiming UC and in work
- Introduction of landlord portal so that HA's and in the future, private landlords can access information quickly about amount of and dates of payments due online

**Type(s) of Impact**

**Linked Risks**

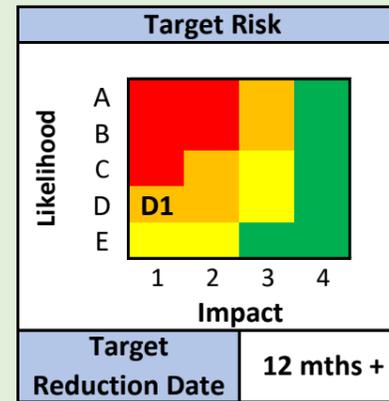
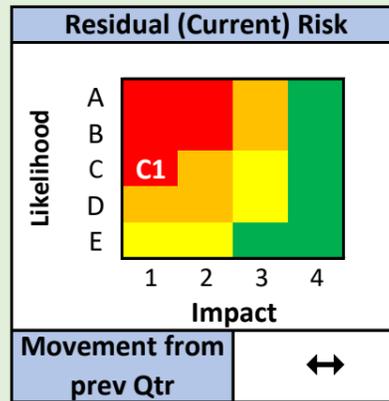
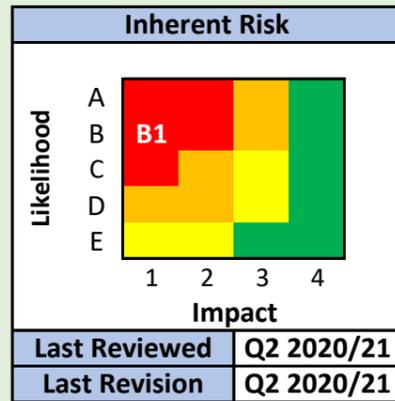
**Key Indicators / Measures used to monitor the risk**

Number of customers supported and assisted with their claims for Universal Credit  
Additional weekly benefit identified for clients of the city centre advise team

## Increase in Demand (Children's Services)

**Description**

Failure to effectively manage demand resulting in increase in number of children looked after and the service and financial pressures this presents.



**Risk Owner(s)**

**Sarah McGill**  
(Deborah Driffield)

**Councillor Graham Hinchey**  
Children & Families

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Early Help Strategy
- Cardiff Family Advice and Support Service
- Information, Advice and Assistance functions (including Dewis Cymru)
- Locality working
- Interface Protocol for Children's Services with Children's Team Around Family (TAF) and Disability Team Around the Family (DTAF)
- Flying Start
- Rapid Response Service
- Adolescent Resource Centre
- Legal tracker
- Decision making panels
- Direct Payments
- Young Carers Action Plan
- Families First Services recommissioned
- Signs of Safety implementation plan
- "Delivering Excellent Outcomes" Children's Services Strategy
- Recruitment and retention strategy in place to address children's workforce issues.
- Flexible approach to the deployment of staff utilising people's skills and capacity to solve problems / take projects forward and reduce "silo" working.
- Focussed on what ONLY social workers can do and identified what tasks can be completed by other workers – further work on skill mix is ongoing.
- Working hours flexible to meet service and personal needs.
- Referrals to Safe Families.
- Referrals to Ymbarel.
- Provision and analysis of performance information being tailored to meet arising issues (e.g. monitoring domestic violence).
- Managed Team resource secured - graduated exit plan in place.
- Care & Support staff resources secured until 31st March 2021.
- Work to develop a Reunification Framework has restarted.
- Family Group Conferencing

**What we plan to do to meet target**

(Relevant DDP 2019/20 actions noted in brackets.)

- Improving Outcomes for Children Programme Board and project groups beneath it
- Children's Commissioning Strategy and Market Position Statement being developed to address placement quality and sufficiency (CP 12 - CS)
- Fostering project and residential care projects supporting delivery of the emerging needs from the Commissioning Strategy (CP 12 - CS)
- Partnership arrangements for delivery of Child and Adolescent Mental Health Service (CAMHS) to be reviewed (CP 5 - CS)
- Transformation and ICF proposals developed to enhance services at the edge of care and support proactive improvement (DP 21 - SS)
- Deliver a three year plan that combines service and financial planning for Adult and Children's Social Services (CP 24 - SS)
- Implement new senior management arrangements to ensure that we are able to meet the current and future challenges (DP 22 - SS)
- Following initial dip in demand in the post lock down period, demand has started to rise again; ongoing monitoring due to potential for impact of COVID-19 crisis to increase demand for services.
- Potential for backlog of private law cases noted.

**Potential Impact(s)**

- Family breakdown leading to children becoming looked after
- Growth in the number of children entering the looked after system and associated costs for the Authority
- Insufficient placements to meet need
- Children are less likely to achieve their potential and to be fully participating citizens
- Life chances for children are reduced
- Delays in issuing care proceedings because of existing capacity in both Children's and Legal Services
- Challenges in improving outcomes for children
- Challenges in effectively managing service and financial pressures
- Significant increase in demand for residential and foster care placements for children looked after resulting in increase in numbers living outside Cardiff

**Linked Risks**

- Workforce Planning (Social Services)
- Safeguarding

**Key Indicators / Measures used to monitor the risk**

Children's Services:

- Early Help 1 - Number of people supported through the Family Gateway
- Early Help 2 - Number of people supported by the Family Help Team
- Early Help 3 - Number of people supported by the Family Support Team
- Contacts 1 - Number of Contacts / Referrals Received
- SSWB 24 - Percentage of assessments completed for children within statutory timescales
- CS LAC 3e - Number of children looked after

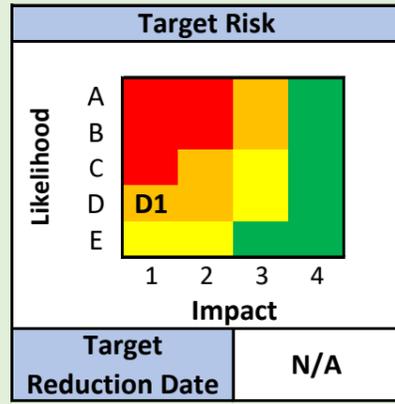
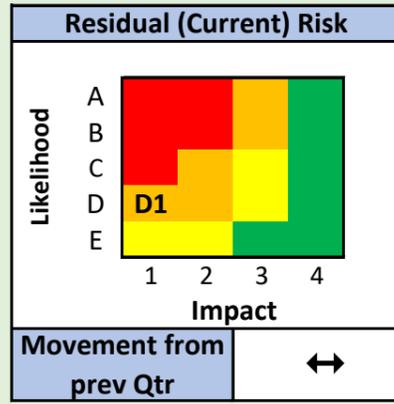
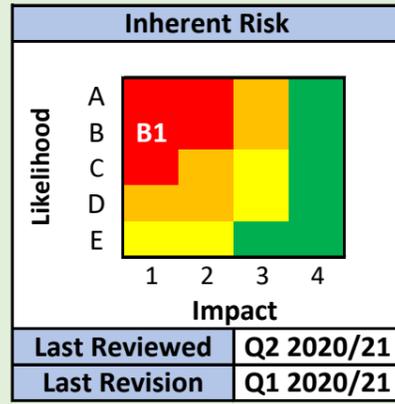
**Type(s) of Impact**

- Service Delivery
- Reputational
- Legal
- Financial
- Community & Environment
- Stakeholder

# Safeguarding

**Description**  
Systemic failure in the effectiveness of the Council's safeguarding arrangements together with other statutory safeguarding partners.

- Potential Impact(s)**
- A child(ren) or adult(s) suffer(s) avoidable significant harm or death
  - Reputation of Council and partners
  - Severe adverse publicity
  - Potential regulator intervention
  - Loss of confidence by community in safety of children and adults
  - Loss of confidence of staff in the overall "safety" of the service, impacting on morale, recruitment and retention
  - Potential litigation with associated financial penalties
  - Significant financial implications of formal intervention



**Risk Owner(s)**

Sarah McGill

**Councillor Huw Thomas**  
Leader

**Councillor Susan Elsmore**  
Social Care, Health & Well-being

**Councillor Graham Hinchey**  
Children & Families

**Councillor Chris Weaver**  
Finance, Modernisation and Performance

- Type(s) of Impact**
- Service Delivery
  - Reputational
  - Legal
  - Financial
  - Partnership
  - Community & Environment
  - Stakeholder

- Linked Risks**
- Increase in Demand (Children's Services)
  - Workforce - Social Services

- What we plan to do to meet target**
- (Relevant DDP 2019/20 actions noted in brackets.)
- Implementation of revised Corporate Safeguarding Policy and action plan arising from internal audit of corporate safeguarding (CP 19 - SS).
  - Additional investment in corporate safeguarding to address recommendations from internal audit report.
  - Exploitation Strategy being developed to cover wider exploitation issues, including adults, in a multi agency way (CP 20 - SS).
  - Ensure children and adults are protected from risk of harm and abuse by raising awareness among public and professionals for the duration of the plan (DP 18 - SS).
  - Embed the Quality Assurance Framework in Adult and Children's Services (DP 19 - SS).
  - Process and escalation procedures agreed for children's work, to be agreed with adults (DP 30 - AS).
  - Implement new arrangements within the Multi Agency Safeguarding Hub (MASH) to take account of the new Early Help Service (CP 21 - CS).

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Regional Adults / Children's Safeguarding Board.
- Cardiff Local Operational Safeguarding Group established to support effective multi-agency safeguarding arrangements across the city, reporting to the Regional Safeguarding Board.
- Corporate Safeguarding Board chaired at Director level with each Directorate completing a self assessment in relation to safeguarding.
- Safeguarding issues included in Senior Management Assurance Statement from 2019/20.
- Delivering Excellence for Children Steering Group chaired by Chief Executive established to oversee performance to improve outcomes for Cardiff's most vulnerable children.
- Operational Manager Safeguarding Forum meets quarterly.
- Systems in place to learn lessons from and address recommendations from Child Practice Reviews, Adult Practice Reviews and multi agency practitioner forums.
- Monthly quality and performance review across all areas of Social Services.
- QBAR system implementation to understand and address significant risks, including safeguarding risks, in Social Services.
- Recruitment and retention strategy in place to address children's workforce issues.
- Action plan being delivered to address high caseloads in Children's Services.
- Refreshed Signs of Safety action plan in place.
- Ongoing implementation of the Exploitation Strategy.
- Raising profile of Adult Sexual Exploitation (ASE) in Adult Services in line with Child Exploitation.
- Embedding Social Services and Well-being (Wales) Act 2014 in relation to strengthening of adult safeguarding.
- Review of adult safeguarding undertaken and management strengthened - adult safeguarding improvement plan developed.
- Safeguarding Self Assessment reviews completed.
- Regular performance monitoring meetings with Children's and Adult Social Services.
- Overarching Quality Assurance Framework under development.
- All Wales Safeguarding Procedures launched.
- WAO review of corporate safeguarding.
- Communication with partners and public to ensure they are aware of how to contact Children's Services during the crisis.
- Risk rated all cases and included contingency plans on file.
- Face to face visits reintroduced on the basis of risk assessment - all statutory visits are now face to face where it is safe to do so.
- Face to face contact with all children and families reinstated on the basis of risk assessment.
- High risk panel Terms of Reference reviewed with partners.
- Priority safeguarding activity continues with partners – joint management and response to risks - agile decision making through Bronze & Silver.
- OMs have oversight of all high risk cases and share decision making responsibility.
- Regular communication with staff.
- Procedures updated and shared in response to COVID-19 crisis.
- Education provision secured for high risk children throughout the COVID-19 crisis.
- Working hours flexible to meet service and personal needs.
- Surveys undertaken with staff, children and families / carers to determine what has / has not worked well during the crisis and how we can use this experience to shape services going forward, e.g. use of technology.
- Practice development group set up with leads allocated to workstreams to shape good practice going forward.
- MISPER Strategy under development.

**Key Indicators / Measures used to monitor the risk**

- Adult Services: SSWB 18 Percentage of adult protection enquiries completed within 7 working days
- Children's Services: SSWB 24 Percentage of assessments completed for children within statutory timescales
- SCC.014 Percentage of initial child protection conferences carried out within statutory timescales during the year
- SCC.034 Percentage of child protection reviews carried out within statutory timescales during the year
- SSWB 27 Percentage of re-registrations of children on local authority Child Protection Registers
- SSWB 28 Average length of time for all children who were on the CPR during the year
- Res 15 - Percentage of Council staff completing Safeguarding Awareness Training
- Under development - Part IV Referrals
- Under development - Professional concerns
- Under development - Escalating concerns

# Legal Compliance

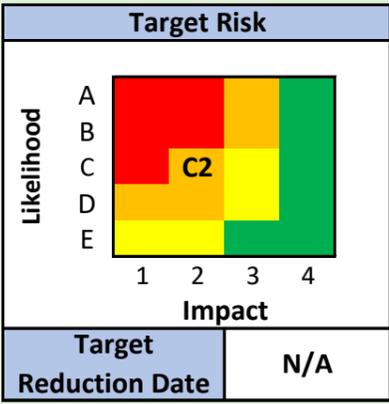
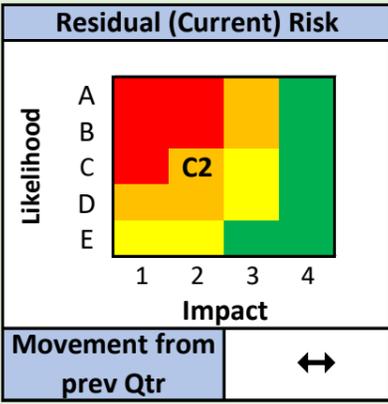
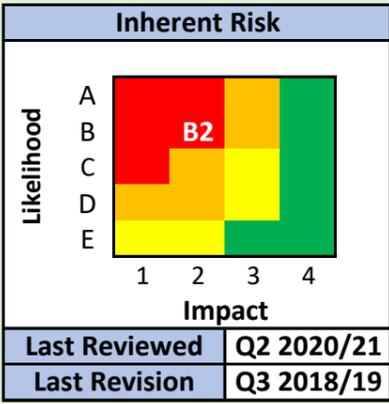
**Description**

Changes in services and staff roles across the Council resulting in:

- gaps in Council wide knowledge of the local authority framework of responsibilities and duties within which we have to operate;
- inability to deliver the services in accordance with all duties and responsibilities due to lack of resource:

In each case leading to increased risk of challenges.

Reduction and changes in front-line services, discretionary and statutory, will lead to increased risks of challenge from users and other stakeholders affected.



**Risk Owner(s)**

Davina Fiore

Councillor Huw Thomas  
Leader

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Professional internal legal and financial advice provided to a high standard
- Maintaining robust decision making process with legal implications on all Council, Cabinet and Committee reports and Officer Decision Reports at Director level
- Appropriate use of NPS Legal Services by Solicitors Framework to increase resilience
- Dedicated teams in specialist areas e.g. equalities, FOI / DPA
- Sharing training/publications received

**What we plan to do to meet target**

- Further development of standard precedents with guidance for use in cases of low value/low risk/repetitive matters
- Provide legal training to Directorates to develop knowledge within Directorates of specific statutory functions.
- Encourage Directorates to ensure reports are discussed at preliminary stage in development to ensure all legal issues are addressed early

**Potential Impact(s)**

- Increase in number of challenges and complaints with consequences in terms of already stretched resources and impact of adverse decisions
- Implementation of decisions delayed due to challenges and potentially fatally disrupted
- Impact on projects if reputation for sound management and implementation of projects is damaged
- Major incident
- Adverse press/media reaction
- Involvement from Welsh Government in terms of performance standards or measures
- Increased costs
- Impact on capacity to deal with proactive legal work

**Type(s) of Impact**

- Service Delivery
- Reputational
- Legal
- Financial

**Linked Risks**

**Key Indicators / Measures used to monitor the risk**

This page is intentionally left blank

## **CALCULATION OF THE COUNCIL TAX BASE**

### **FINANCE, MODERNISATION AND PERFORMANCE (COUNCILLOR WEAVER)**

### **AGENDA ITEM: 9**

#### **Reason for this Report**

1. The information is required by the Welsh Government under its powers in section 68 of the Local Government Finance Act 1992, as amended. Cabinet has the authority to approve the Council Tax Base following the determination by Council in 2013 which delegated such further decisions to Cabinet.

#### **Background**

2. Section 33 of the Local Government Act 1992 requires each billing authority to calculate the Council Tax Base each year. The Local Authorities (Calculation of Council Tax Base)(Wales) Regulations 1995, as amended, contain rules for this calculation, which in essence, are as follows:
  - a) Determine the number of chargeable dwellings in each valuation band, taking account of exemptions and anticipated changes during the year.
  - b) Adjust the numbers in each band to take account of the disablement reductions.
  - c) Allow for discounts in respect of disregarded individuals and those occupied by one person only.
  - d) Adjust for premiums on long term empty properties and second homes
  - e) Weight the adjusted total for each band to equate it to band D.
  - f) Repeat the calculation for each of the six Community Councils that issue precepts.

#### **Issues**

3. The Council Tax Base calculation is a complex annual exercise that is used by the Welsh Government (WG) for the distribution of Revenue Support Grant. It is also used by the Council for calculating the Council

Tax charges for each year. Appendices A to G set out the detailed calculation. As the Appendices are in a format prescribed by WG the following points explain the details included in those Appendices.

- The number of domestic dwellings in the valuation list in force at the 31 October is used and adjusted to take account of anticipated new properties, demolitions, appeals and exemptions which is represented as chargeable dwellings (line A1 Appendix A).
  - Properties in receipt of disablement relief receive a reduction of 1 band in their amount payable. Lines A2 and A3 reflect these adjustments. For example the number of properties in band B (at line A1) amounting to 18,628 is reduced by 82 for those that will receive the 1 band reduction and increased by 300 for those properties coming down from band C. This gives a new total of 18,846.
  - An estimate of the number of single person discounts (B2a), double discounts (B2b) and premium for long term empty properties (B3c) are also taken into account in the calculation. The total in line C2 takes the total (A3) and adjusts for the weighted number of discounts and second home premium.
  - To convert the total in each band to a band D equivalent the appropriate ratio, as set out in line C3, is applied to reach the total band D equivalents in C4.
4. The total band D equivalent properties calculated are then adjusted to take account of the estimated collection rate, as well as any contributions in respect of M.o.D. properties, as follows:

<b>2020/21</b>		<b>2021/22</b>
149,470.06	Total Discounted chargeable dwellings: band D equivalent (a)	149,995.34
98.5%	Estimated Collection Rate (b)	98.5%
147,228.01	(a) x (b)	147,745.41
48.55	M.o.D. exempt dwellings: band D equivalent	48.55
<b>147,276.56</b>		<b>147,793.96</b>
<b>(147,277)</b>	Council Tax Base for tax-setting purposes	<b>(147,794)</b>

The table above shows an increase in the Council Tax Base of 517 properties at band D equivalent.

5. At the time that the Council Tax Base was set last year, it was anticipated that an additional 1,568 properties would come into the Council Tax list during 2020/21. The rate of property growth in the city has decreased significantly this year mainly as a direct consequence of Covid-19 and it is now anticipated that only 1,065 will be included in the list by 31 March 2021.

6. In previous years there has been a significant increase in the number of properties in receipt of student exemptions. Whilst this rate of increase is expected to slow down we are still projecting an overall increase in the total number of student exemptions. At this stage it is not certain whether the Covid-19 pandemic or Brexit will have any material impact on these figures.
7. The council tax base calculations have been reviewed to ensure that they reflect the current demographic makeup of properties and occupancy within the city. In future years due to the Local Development Plan and Cardiff Living (formerly the Housing Partnership Programme) it is anticipated the scale of development will continue to see increases in new properties and commensurate increases in the tax base. The impact of Covid-19 has had a dampening impact in 2020/21 and it is anticipated to also impact in 2021/22.
8. Welsh Government assume 100% of the tax base for Revenue Support Grant, however, for Council Tax setting purposes it is necessary to assume an ultimate collection rate for 2021/22. Since 2016/17 we have used an ultimate collection rate of 98.5%. Whilst the in-year collection rate is almost 1% lower than the previous year, it is anticipated that as further recovery action including court work takes place, this rate will improve. The ultimate collection rate reflects the final position achieved after a number of years of collection rather than the in-year position. The most appropriate estimate of our ultimate collection rate is still 98.5%. This position will continue to be kept under review and closely monitored.

#### Schedule of precept payments

9. Regulations require that by 31 December each year the Council inform each of its precepting authorities of the proposed dates of monthly precept payments in the following year and determines a payments schedule by 31 January.
10. Currently instalment payments to The Police and Crime Commissioner for South Wales are paid on the last working day of each month and to the Community Councils on 1 April, and it is recommended that these arrangements should continue for 2021/22.

#### **Reason for Recommendations**

11. It is a statutory obligation for the Council to agree its Council Tax Base annually and this figure is used for Council Tax setting.

#### **Financial Implications**

12. The Council Tax Base will be used to set the specific Council Tax charges for 2021/22 when the budget is approved. There are a large number of variables that are included in this calculation such as new properties, demolitions, effect of appeals, changes to discounts and exemptions and it is important to ensure that the resulting estimate of properties is as accurate as possible. A small percentage variance could result in a large

difference against the budget. The tax base calculation is also used by the Welsh Government for the determination of the distribution of Revenue Support Grant. The final financial settlement from the Welsh Government will include the redistribution impact of these figures across Wales.

13. The increase in the tax base, as set out in this report, is estimated to generate an additional £795,296 in 2021/22 without raising the actual rate of tax. The £795,296 represents additional revenue for the Police and Crime Commissioner for South Wales of £140,996 whilst Cardiff Council will receive an additional £654,300. At present, this is not taken into account in the draft budget position. Established practice is to wait until the Final Financial Settlement from Welsh Government before taking any benefits from increased Council Tax Base. This is due to the fact that if a Council's Council Tax Base increases relative to the tax base of other Councils, then Revenue Support Grant will reduce as a direct consequence.

### **Legal Implications**

14. The Council Tax Base is essentially the constituency of Council Tax payers having regard to the fact that some persons will be entitled to reductions in Council Tax and others will be eligible for exemptions from payment. The Council Tax Base is calculated in accordance with a complicated formula laid down in the Local Authorities (Calculation of Council Tax Base) (Wales) Regulations 1995, as amended.
15. The central provision is regulation 3, which provides that the Council Tax Base is calculated by multiplying the total of the 'relevant amounts' by the authority's estimate of its collection rate for the year. It is therefore necessary to identify both the 'relevant amount' and the 'collection rate'.
16. Regulation 3 of the Local Authorities (Calculation of Council Tax Base) and the Council Tax (Prescribed Classes of Dwellings) (Wales) (Amendment) Regulations 2000 inserts a new regulation 5A into the 1995 Regulations. This provides for the calculation of "the relevant amounts" by a billing authority for financial years beginning on or after 1 April 2005. The relevant amount for each Council Tax band is a measure of the number of dwellings in that band after taking account of exempt dwellings and discounts.
17. The 'relevant amount' is the maximum sum which the authority would recover in respect of the dwellings in the particular band. However, the regulations anticipate that this will not always be the case. Thus in order to ascertain the Council Tax Base, it is necessary to determine the collection rate. This is governed by regulation 3 of the 1995 Regulations. The Council must estimate its collection rate for the financial year by estimating the aggregate of the amounts in respect of Council Tax for the year which are likely to be paid to the Council expressed as a proportion of its estimate of the total of such amounts which are payable to the Council taking into account certain discounts. In order to calculate the Council Tax Base, the authority then adds up the total of the relevant amounts previously calculated and multiplies this by the estimate of the

collection rate. This leaves the 'Council Tax Base'. The sum which the authority has calculated must be raised locally and is then divided by the Council Tax Base figure to give the 'basic amount of Council Tax' as defined in section 33 of the Local Government Finance Act 1992.

18. The relevant day for the financial year commencing 1 April 2021 will be 31 October 2020.
19. All decisions taken by or on behalf the Council must (a) be within the legal powers of the Council; (b) comply with any procedural requirement imposed by law; (c) be within the powers of the body or person exercising powers of behalf of the Council; (d) be undertaken in accordance with the procedural requirements imposed by the Council e.g. standing orders and financial regulations; (e) be fully and properly informed; (f) be properly motivated; (g) be taken having regard to the Council's fiduciary duty to its taxpayers; and (h) be reasonable and proper in all the circumstances.

### **HR Implications**

20. There are no HR implications for this report.

### **Property Implications**

21. The Strategic Estates Department have reviewed report in respect of the calculation of the Council's tax base and there are no particular issues identified, at this stage, from a property implications perspective for its non-residential estate. Any matters involving the Council's non-residential estate should be done so in accordance with the Council's Asset Management process and in consultation with Strategic Estates and relevant service areas.

## **RECOMMENDATIONS**

Cabinet is recommend to approve the following resolutions:

- (1) the calculation of the Council's tax base for the year 2021/22 be approved;
- (2) that pursuant to this report and in accordance with the Local Authorities (Calculation of Tax Base) (Wales) Regulations 1995, as amended, the amount calculated by Cardiff Council as its Council Tax Base for the year 2021/22 shall be 147,794;
- (3) that pursuant to this report and in accordance with the Local Authorities (Calculation of Tax Base) (Wales) Regulations 1995, as amended, the amounts calculated by the Council as the Council Tax Base for the year 2021/22 in the community areas subject to a precept shall be as follows:

Lisvane	2,513
Pentyrch	3,369
Radyr	3,847
St. Fagans	1,746
Old St. Mellons	2,192
Tongwynlais	822

- (4) that the arrangements for the payment of precepts in 2021/22 to the Police and Crime Commissioner for South Wales to be by equal instalments on the last working day of each month from April 2021 to March 2022 and the Community Councils be by one payment on 1 April 2021, be on the same basis as that used in 2020/21 and the precepting authorities be advised accordingly.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>CHRISTOPHER LEE</b>
	Corporate Director Resources 11 December 2020

*The following appendices are attached:*

- Appendix A: Calculation of the Council Tax Base for the City and County of Cardiff
- Appendices B-G: Calculation of the Council Tax Base for the 6 Community Councils

**CARDIFF COUNCIL  
COUNCIL TAX BASE CALCULATION FOR 2021/22**

**APPENDIX A**

DESCRIPTION	BAND A*	BAND A	BAND B	BAND C	BAND D	BAND E	BAND F	BAND G	BAND H	BAND I	TOTAL
Dwellings per V.O. listing	0	4,356	19,872	33,612	36,108	30,299	21,404	10,186	2,743	1,451	160,031
All Chargeable Dwellings (A1)	0	3,928	18,628	31,393	34,045	26,018	19,803	9,764	2,661	1,425	147,665
Dwellings subject to disability reduction (A2)	0	8	82	300	382	364	338	191	46	55	1,766
<b>Adjusted chargeable Dwellings (A3)</b>	<b>8</b>	<b>4,002</b>	<b>18,846</b>	<b>31,475</b>	<b>34,027</b>	<b>25,992</b>	<b>19,656</b>	<b>9,619</b>	<b>2,670</b>	<b>1,370</b>	<b>147,665</b>
Dwellings with no discount or premium (B1)	2	960	8,430	17,570	20,526	17,399	14,534	7,644	2,174	1,177	90,416
Dwellings with one discount excluding long term empty and second properties (B2a)	6	2,999	10,156	13,621	13,228	8,376	4,966	1,879	438	161	55,830
Dwellings with two discounts excluding long term empty and second properties (B2b)	0	1	55	43	75	90	77	52	49	20	462
Dwellings with long term empty properties or second homes discount (B3b)	0	0	0	0	0	0	0	0	0	0	0
Dwellings with long term empty properties or second homes premium (B3c)	0	42	205	241	198	127	79	44	9	12	957
<b>Total adjusted chargeable dwellings</b>	<b>8</b>	<b>4,002</b>	<b>18,846</b>	<b>31,475</b>	<b>34,027</b>	<b>25,992</b>	<b>19,656</b>	<b>9,619</b>	<b>2,670</b>	<b>1,370</b>	<b>147,665</b>
Long term empty property & second home discount adjustment (B6)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Long term empty property & second home premium adjustment (B7)	0.0	21.0	102.5	120.5	99.0	63.5	39.5	22.0	4.5	6.0	478.5
Total dwellings including discounts (C2)	<b>7</b>	<b>3,273</b>	<b>16,382</b>	<b>28,169</b>	<b>30,782</b>	<b>23,917</b>	<b>18,416</b>	<b>9,145</b>	<b>2,541</b>	<b>1,326</b>	
Band D Relation (C3)	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
Band D Equivalent (C4)	3.61	2,181.83	12,741.56	25,038.89	30,781.50	29,231.28	26,600.17	15,242.08	5,081.00	3,093.42	149,995.34
Ultimate Collection Rate											98.50%
Adjusted for Class O exemptions											48.55
Council Tax Base for tax-setting purposes											147,793.96

This page is intentionally left blank

# CARDIFF COUNCIL

## COUNCIL TAX BASE CALCULATION FOR 2021/22

APPENDIX B

LISVANE

DESCRIPTION	BAND A*	BAND A	BAND B	BAND C	BAND D	BAND E	BAND F	BAND G	BAND H	BAND I	TOTAL
Dwellings per V.O. listing	0	0	1	12	47	62	154	740	282	203	1,501
New properties October 2020- March 2021	0	0	0	0	0	2	18	4	2	1	27
New properties April 2021 - March 2022	0	0	0	0	0	0	5	7	10	2	24
Dwellings per V.O. listing (+ projections)	0	0	1	12	47	64	177	751	294	206	1,552
Exemptions	0	0	0	-2	-5	-1	-5	-8	-2	0	-23
Chargeable dwellings Total	0	0	1	10	42	63	172	743	292	206	1,529
Disablement Relief	0	0	0	0	0	2	14	6	1	0	23
<b>Adjusted Chargeable Dwellings Total</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>10</b>	<b>44</b>	<b>75</b>	<b>164</b>	<b>738</b>	<b>291</b>	<b>206</b>	<b>1,529</b>
Dwellings with one discount	0	0	0	9	30	22	41	136	47	27	312
Dwellings with two discount	0	0	0	0	0	0	2	0	2	0	4
Dwellings with premium	0	0	0	1	0	1	1	3	1	1	8
Dwellings with no discount or premium	0	0	1	0	14	52	120	599	241	178	1,205
<b>Total adjusted chargeable dwellings</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>10</b>	<b>44</b>	<b>75</b>	<b>164</b>	<b>738</b>	<b>291</b>	<b>206</b>	<b>1,529</b>
Long term premium adjustment	0.00	0.00	0.00	0.50	0.00	0.50	0.50	1.50	0.50	0.50	4.00
<b>Total dwellings including discounts</b>	<b>0.00</b>	<b>0.00</b>	<b>1.00</b>	<b>8.25</b>	<b>36.50</b>	<b>70.00</b>	<b>153.25</b>	<b>705.50</b>	<b>278.75</b>	<b>199.75</b>	<b>1,453.00</b>
Band D Relation	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
Band D Equivalent	0.00	0.00	0.78	7.33	36.50	85.56	221.36	1,175.83	557.50	466.08	2,550.94
Estimated Collection Rate											98.5%
Tax Base											2,512.68

This page is intentionally left blank

# CARDIFF COUNCIL COUNCIL TAX BASE CALCULATION FOR 2021/22

APPENDIX C

## PENTYRCH

DESCRIPTION	BAND A*	BAND A	BAND B	BAND C	BAND D	BAND E	BAND F	BAND G	BAND H	BAND I	TOTAL
Dwellings per V.O. listing	0	2	83	242	322	396	834	445	172	91	2,587
New properties October 2020- March 2021	0	0	0	0	0	10	10	2	3	1	26
New properties April 2021 - March 2022	0	0	0	0	0	14	14	5	4	0	37
Dwellings per V.O. listing (+ projections)	0	2	83	242	322	420	858	452	179	92	2,650
Exemptions	0	-1	-6	-6	-4	-10	-6	-6	-1	0	-40
Chargeable Dwellings	0	1	77	236	318	410	852	446	178	92	2,610
Disablement Relief	0	0	2	9	1	9	5	0	3	0	29
<b>Adjusted Chargeable Dwellings Total</b>	<b>0</b>	<b>3</b>	<b>84</b>	<b>228</b>	<b>326</b>	<b>406</b>	<b>847</b>	<b>449</b>	<b>175</b>	<b>92</b>	<b>2,610</b>
Dwellings with one discount	0	1	50	139	126	103	176	65	24	8	692
Dwellings with two discount	0	0	0	0	2	0	0	1	0	0	3
Dwellings with premium	0	0	1	2	2	1	1	1	0	0	8
Dwellings with no discount or premium	0	2	33	87	196	302	670	382	151	84	1,907
<b>Total adjusted chargeable dwellings</b>	<b>0</b>	<b>3</b>	<b>84</b>	<b>228</b>	<b>326</b>	<b>406</b>	<b>847</b>	<b>449</b>	<b>175</b>	<b>92</b>	<b>2,610</b>
Long term premium adjustment	0.00	0.00	0.50	1.00	1.00	0.50	0.50	0.50	0.00	0.00	4.00
<b>Total dwellings including discounts</b>	<b>0.00</b>	<b>2.75</b>	<b>72.00</b>	<b>194.25</b>	<b>294.50</b>	<b>380.75</b>	<b>803.50</b>	<b>432.75</b>	<b>169.00</b>	<b>90.00</b>	<b>2,439.50</b>
Band D Relation	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
Band D Equivalent	0.00	1.83	56.00	172.67	294.50	465.36	1,160.61	721.25	338.00	210.00	3,420.22
Estimated Collection Rate											98.5%
Tax Base											3,368.92

This page is intentionally left blank

# CARDIFF COUNCIL COUNCIL TAX BASE CALCULATION FOR 2021/22

APPENDIX D

RADYR

DESCRIPTION	BAND A*	BAND A	BAND B	BAND C	BAND D	BAND E	BAND F	BAND G	BAND H	BAND I	TOTAL
Dwellings per V.O. listing	0	0	8	92	342	466	849	819	198	90	2,864
New properties October 2020- March 2021	0	0	0	1	20	5	7	0	0	0	33
New properties April 2021 - March 2022	0	0	0	0	4	7	17	2	0	0	30
Dwellings per V.O. listing (+ projections)	0	0	8	92	342	466	849	819	198	90	2,864
Exemptions	0	0	-1	-4	-7	-6	-10	-3	-1	0	-32
Chargeable Dwellings	0	0	7	88	335	460	839	816	197	90	2,832
Disablement Relief	0	0	0	0	9	9	10	3	1	0	32
<b>Adjusted Chargeable Dwellings Total</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>97</b>	<b>335</b>	<b>461</b>	<b>832</b>	<b>814</b>	<b>196</b>	<b>90</b>	<b>2,832</b>
Dwellings with one discount	0	0	4	54	164	178	190	128	21	8	747
Dwellings with two discount	0	0	0	0	1	2	2	1	1	0	7
Dwellings with premium	0	0	0	2	1	0	1	0	1	2	7
Dwellings with no discount or premium	0	0	3	41	169	281	639	685	173	80	2,071
<b>Total adjusted chargeable dwellings</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>97</b>	<b>335</b>	<b>461</b>	<b>832</b>	<b>814</b>	<b>196</b>	<b>90</b>	<b>2,832</b>
Long term premium adjustment	0.00	0.00	0.00	1.00	0.50	0.00	0.50	0.00	0.50	1.00	3.50
<b>Total dwellings including discounts</b>	<b>0.00</b>	<b>0.00</b>	<b>6.00</b>	<b>84.50</b>	<b>294.00</b>	<b>415.50</b>	<b>784.00</b>	<b>781.50</b>	<b>190.75</b>	<b>89.00</b>	<b>2,645.25</b>
Band D Relation	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
Band D Equivalent	0.00	0.00	4.67	75.11	294.00	507.83	1,132.44	1,302.50	381.50	207.67	3,905.72
Estimated Collection Rate											98.5%
Tax Base											3,847.13

This page is intentionally left blank

# CARDIFF COUNCIL

## COUNCIL TAX BASE CALCULATION FOR 2021/22

APPENDIX E

### ST. FAGANS

DESCRIPTION	BAND A*	BAND A	BAND B	BAND C	BAND D	BAND E	BAND F	BAND G	BAND H	BAND I	TOTAL
Dwellings per V.O. listing	0	0	17	91	187	278	276	243	97	44	1,233
New properties October 2020- March 2021	0	0	0	0	0	20	26	18	0	0	64
New properties April 2021- March 2022	0	0	0	0	0	14	16	14	0	0	44
Dwellings per V.O. listing (+ projections)	0	0	17	91	187	312	318	275	97	44	1,341
Exemptions	0	0	-1	-4	-1	-5	-3	0	-1	0	-15
Chargeable Dwellings	0	0	16	87	186	307	315	275	96	44	1,326
Disablement Relief	0	1	1	2	5	4	2	2	0	0	17
<b>Adjusted Chargeable Dwellings Total</b>	<b>1</b>	<b>0</b>	<b>17</b>	<b>90</b>	<b>185</b>	<b>305</b>	<b>315</b>	<b>273</b>	<b>96</b>	<b>44</b>	<b>1,326</b>
Dwellings with one discount	0	0	8	42	52	66	50	36	17	7	278
Dwellings with two discount	0	0	0	0	1	1	0	0	0	0	2
Dwellings with premium	0	0	0	0	1	6	1	2	1	0	11
Dwellings with no discount or premium	1	0	9	48	131	232	264	235	78	37	1,035
<b>Total adjusted chargeable dwellings</b>	<b>1</b>	<b>0</b>	<b>17</b>	<b>90</b>	<b>185</b>	<b>305</b>	<b>315</b>	<b>273</b>	<b>96</b>	<b>44</b>	<b>1,326</b>
Long term premium adjustment	0.00	0.00	0.00	0.00	0.50	3.00	0.50	1.00	0.50	0.00	5.50
<b>Total dwellings including discounts</b>	<b>1.00</b>	<b>0.00</b>	<b>15.00</b>	<b>79.50</b>	<b>172.00</b>	<b>291.00</b>	<b>303.00</b>	<b>265.00</b>	<b>92.25</b>	<b>42.25</b>	<b>1261.00</b>
Band D Relation	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
Band D Equivalent	0.56	0.00	11.67	70.67	172.00	355.67	437.67	441.67	184.50	98.58	1,772.99
Estimated Collection Rate											98.5%
Tax Base											1,746.40

This page is intentionally left blank

**CARDIFF COUNCIL**  
**COUNCIL TAX BASE CALCULATION FOR 2021/22**  
**OLD ST. MELLONS**

**APPENDIX F**

DESCRIPTION	BAND A*	BAND A	BAND B	BAND C	BAND D	BAND E	BAND F	BAND G	BAND H	BAND I	TOTAL
Dwellings per V.O. listing	0	99	155	341	337	316	369	139	78	64	1,898
New properties October 2020- March 2021	0	3	0	1	10	37	13	3	0	3	70
New properties April 2021 - March 2022	0	1	0	1	8	30	6	1	0	1	48
Dwellings per V.O. listing (+ projections)	0	103	155	343	355	383	388	143	78	68	2,016
Exemptions	0	-7	-6	-9	-7	-1	-1	-4	-1	-1	-37
Chargeable Dwellings	0	96	149	334	348	382	387	139	77	67	1,979
Disablement Relief	0	0	2	1	2	3	3	0	0	0	11
<b>Adjusted Chargeable Dwellings Total</b>	<b>0</b>	<b>98</b>	<b>148</b>	<b>335</b>	<b>349</b>	<b>382</b>	<b>384</b>	<b>139</b>	<b>77</b>	<b>67</b>	<b>1,979</b>
Dwellings with one discount	0	71	104	171	126	69	56	26	15	11	649
Dwellings with two discount	0	0	0	0	1	1	1	1	0	0	4
Dwellings with premium	0	0	0	0	4	0	0	0	1	2	7
Dwellings with no discount or premium	0	27	44	164	218	312	327	112	61	54	1,319
<b>Total adjusted chargeable dwellings</b>	<b>0</b>	<b>98</b>	<b>148</b>	<b>335</b>	<b>349</b>	<b>382</b>	<b>384</b>	<b>139</b>	<b>77</b>	<b>67</b>	<b>1,979</b>
Long term premium adjustment	0.00	0.00	0.00	0.00	2.00	0.00	0.00	0.00	0.50	1.00	3.50
<b>Total dwellings including discounts</b>	<b>0.00</b>	<b>80.25</b>	<b>122.00</b>	<b>292.25</b>	<b>319.00</b>	<b>364.25</b>	<b>369.50</b>	<b>132.00</b>	<b>73.75</b>	<b>65.25</b>	<b>1,818.25</b>
Band D Relation	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
Band D Equivalent	0.00	53.50	94.89	259.78	319.00	445.19	533.72	220.00	147.50	152.25	2,225.83
Estimated Collection Rate											98.5%
Tax Base											2,192.44

This page is intentionally left blank

# CARDIFF COUNCIL COUNCIL TAX BASE CALCULATION FOR 2021/22

APPENDIX G

## TONGWYNLAIS

DESCRIPTION	BAND A*	BAND A	BAND B	BAND C	BAND D	BAND E	BAND F	BAND G	BAND H	BAND I	TOTAL
Dwellings per V.O. listing	0	1	111	164	198	201	92	45	5	9	826
New properties October 2020- March 2021	0	0	0	0	0	0	0	0	1	0	1
New properties April 2021 - March 2022	0	0	0	0	0	0	0	0	1	0	1
Dwellings per V.O. listing (+ projections)	0	1	111	164	198	201	92	45	7	9	828
Exemptions	0	0	-6	-2	-3	-2	-1	0	0	0	-14
Chargeable Dwellings	0	1	105	162	195	199	91	45	7	9	814
Disablement Relief	0	0	1	3	2	0	0	1	2	0	9
<b>Adjusted Chargeable Dwellings Total</b>	<b>0</b>	<b>2</b>	<b>107</b>	<b>161</b>	<b>193</b>	<b>199</b>	<b>92</b>	<b>46</b>	<b>5</b>	<b>9</b>	<b>814</b>
Dwellings with one discount	0	1	62	77	64	55	16	4	0	2	281
Dwellings with two discount	0	0	0	0	1	0	1	0	0	0	2
Dwellings with premium	0	0	0	1	1	1	0	0	0	0	3
Dwellings with no discount or premium	0	1	45	83	127	143	75	42	5	7	528
<b>Total adjusted chargeable dwellings</b>	<b>0</b>	<b>2</b>	<b>107</b>	<b>161</b>	<b>193</b>	<b>199</b>	<b>92</b>	<b>46</b>	<b>5</b>	<b>9</b>	<b>814</b>
Long term premium adjustment	0.00	0.00	0.00	0.50	0.50	0.50	0.00	0.00	0.00	0.00	1.50
<b>Total dwellings including discounts</b>	<b>0.00</b>	<b>1.75</b>	<b>91.50</b>	<b>142.25</b>	<b>177.00</b>	<b>185.75</b>	<b>87.50</b>	<b>45.00</b>	<b>5.00</b>	<b>8.50</b>	<b>744.25</b>
Band D Relation	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
Band D Equivalent	0.00	1.17	71.17	126.44	177.00	227.03	126.39	75.00	10.00	19.83	834.03
Estimated Collection Rate											98.5%
Tax Base											821.52

This page is intentionally left blank

**CABINET MEETING: 17 DECEMBER 2020**

---

**2020/21 HALF-YEAR PERFORMANCE REVIEW**

**FINANCE, MODERNISATION AND PERFORMANCE (COUNCILLOR  
CHRIS WEAVER)**

**AGENDA ITEM: 10**

---

**Reason for this Report**

1. To present the half-year (Quarter 2) assessment of the Council's performance in 2020/21 against the Corporate Plan 2020-23.

**Background**

2. In February 2020, Council approved the Corporate Plan 2020-23. The Corporate Plan sets out how the Council will deliver the administration's priorities as set out in Capital Ambition, and includes the steps and Key Performance Indicators (KPIs) considered necessary to deliver and monitor progress. The Corporate Plan also sets out the Council's Well-being Objectives for 2020/21 in accordance with the Well-being of Future Generations (Wales) Act 2015.

**Issues**

Summary of Half-Year Performance 2020/21

3. A high-level summary of half-year performance is attached as **Appendix A** to this report. This provides a performance update for each of the Council's seven Well-Being Objectives, including progress made, challenges and risks, and next steps. The assessment draws on a range of data sources including performance against Corporate Plan Steps and Key Performance Indicators, Risk, Budget and Assurance work.

Overview of Corporate Performance

4. The Council is continuing its journey of performance improvements, with strong performance against a number of key statutory indicators and good progress made in delivering the administration's priorities.
5. The Council's Annual Well-being Report 2019/20, approved by Cabinet and Council in September 2020, contained an evaluative assessment of the

progress made during 2019/20 and a comprehensive account of the impact of the Covid-19 pandemic on the city.

6. The Well-being Report also made clear the major impact of the pandemic on Council services and the delivery of the Corporate Plan. It recognised how the first quarter of 2020/21 was focused on pandemic management and responding to the challenges of lockdown, whilst Quarter 2 involved the safe restart of many Council services.

#### Responding to the Covid-19 Pandemic

7. In March this year, the Council transitioned rapidly to an 'essential services' model after lockdown measures were introduced by the UK Government, guided by the following three core principles:
  - Preventing the spread of infection;
  - Ensuring the health and safety of staff, service users and citizens; and
  - Prioritising key frontline services and support for vulnerable people.
8. Whilst this period involved unprecedented service challenges and placed significant pressure on almost every aspect of delivery, it also enabled a range of service innovations and the acceleration of policy priorities in a number of areas. This was evident across several of the Council's essential front line services, city management functions and organisational working practices. The work to tackle homelessness, with support from Welsh Government, exemplifies this. The scale of the adaptations and extent of the change to support some of the most vulnerable people in society during the pandemic has led to a fundamental reconsideration of the Council's policy approach.
9. Similarly, extensive adaptations to the city centre and district centres served to repurpose public spaces to make them compliant with the measures needed to control the spread of the virus. This has not only served to protect public health, but has enhanced the appeal of many areas of the city, supported local businesses and built pandemic resilience into the city infrastructure. Organisational adaptations have also been necessary to enable an effective response. The rapid transformation to a home and agile working model, for example, was achieved at a pace and scale that would have previously been considered unmanageable.
10. Within the Council, a programme of work is also ongoing to review and assess how home and agile working can be continued, with a focus on improving service delivery, enhancing staff well-being, locking in productivity improvements and releasing potential efficiency savings. This will include assessing the Council's digital infrastructure, property and assets bases, and workforce to ensure the shape, purpose and delivery arrangements of the Council can respond to the realities of the post Covid-19 world, whilst helping the economic recovery. The strategic and operational adaptations have demonstrated a commitment to improving services, enhancing productivity and tackling longstanding areas of challenge during a period of crisis management.

## Improvement Priorities

11. The assessment at Quarter 2 is broadly consistent with that presented to Cabinet and Council in September within the Statutory Well-being Report:

- **Children Looked After and outcomes for the vulnerable children:**

The emergence of encouraging trends prior to the onset of the Covid-19 pandemic pointed to a shift in the balance of care. Performance data revealed an increase in the number of children remaining at home with a greater percentage of children looked after living with parents or extended family. The new strategic approach and commissioning model adopted by the Council provides a coherent framework for delivery and the challenge going forward will be to deliver effectively the aims of the strategy.

The service has been further strengthened with successful appointments to the senior management team as well as front line management posts. The recruitment and retention of social workers also represents an improved position, following policy decisions to impact performance in this areas, including the introduction of the market supplement. Rapid improvements are also being progressed in relation to Youth Justice through the delivery of the Action Plan, and this will be the subject of a follow-on assessment in December 2020.

The service is, however, grappling with increasing complexity and scale of demand which, if left unchecked, could have significant impact on service user outcomes and the Council's budget. Ongoing areas of challenge include ensuring the sufficiency of placements, particularly to address the numbers of children placed outside of Cardiff.

- **Waste management and street scene services:** The Cabinet identified that significant operational issues were leading to performance, budget and public perception challenges in this service, with key performance metrics in relation to recycling targets and street cleanliness requiring improvement, allied to the need to address financial pressures and ongoing governance and assurance challenges.

Over the course of 2019/20 a robust management response and reform programme was developed to address these longstanding issues. These include the establishment of new management arrangements and a focus on performance management, including a data-led approach to service development and problem resolution. Progress was also made in relation to work force reforms by addressing concerns relating to collections around bank holidays, permanent staff recruitment and improvements in workplace Health and Safety arrangements. Continued focus will be required to ensure that this reform programme delivers sustained improvement.

- **Sickness Absence:** Strengthened corporate policy and an enhanced approach to case management had impacted performance trends prior to Covid-19, with a reduction in short-term sickness. This was offset by an increase in long-term sickness, predominantly attributable to 'out-of-work' stress and musculo-skeletal issues. Over the last six months, there has

been a marked reduction in sickness absence with the Quarter 2 sickness outturn forecast suggesting an end of year position of 7.66 days per FTE against a target of 9.5 day per FTE. This is an improvement of 3.43 FTE days compared to the same forecasted period in 2019/20. There has also been a shift in short-term versus long-term sickness; with the current position of 18% (short-term) and 82% (long-term) comparing with 28% (short-term) and 72% (long-term) in 2019/20.

- **Financial pressures:** The Council continues to face significant ongoing financial pressures as well as the financial implications of Covid-19, with many areas having significant additional expenditure as a result and others facing loss of income. Certain assumptions have been made regarding the extent to which these costs and income losses can be recovered via the Welsh Government Hardship Fund for Local Authorities. However, work continues on both short-term and medium-term financial plans with Directorates in relation to the planning and delivery of efficiency savings. Enhanced service planning has been undertaken in a number of areas grappling with strategic challenges to ensure clear accountabilities, metrics and targets.
- **Digital technology, workforce development, and assets and property:** The Covid-19 crisis has had a significant, and potentially long-term, impact on the Council's approach in this area. The rapid readjustment of a number of corporate working practices, including migrating to home and agile working on a previously unprecedented scale, will demand a focus on digital technology, workforce development, and assets and property. The number of Council devices that enable mobile and agile working has already exceeded the Corporate Plan target for 2020/21. Flexible and adaptive HR policies have been introduced to ensure the Council can support its workforce during the pandemic with a new Homeworking Strategy being developed. The Council's approach to managing its assets has continued, with an immediate focus on ensuring buildings are designated as Covid Safe working areas.

#### Self-Assessment of Performance in Meeting Corporate Plan Steps

12. Directorates were asked to self-assess the RAG (Red / Amber / Green) rating for each of the Corporate Plan Steps for which they are the lead directorate using the following criteria:
  - **Red** – a Step should be rated as Red when serious issues have occurred and it is unlikely that any further progression can be made without some form of assistance from outside of the Directorate (e.g. SMT, enabling services etc.) At the time of writing, it is unlikely that the Step will be delivered within the agreed time frame or at all.
  - **Amber** – a Step should be rated as Amber when issues have occurred but they are not serious enough to require assistance. Progress can be recovered by the Directorate and there is a plan in place for this. It is likely that the Step will still be delivered within the agreed time frame.

- **Green** – a Step should be rated as Green when there are no issues with progress/ performance, and at the time of writing the Step will be delivered within the agreed time frame.
13. At the half-year stage (end of Quarter 2), the 99 separate Steps contained within the Corporate Plan 2020-23 were assessed as follows:
- 51.52% – Green;
  - 42.42% – Amber;
  - 6.06% – Red.
14. Directorates were also asked to carry out a self-assessment of deliverability at year end of the Steps within the Corporate Plan 2020-23 in order to take account of the impact of the Covid-19 pandemic on services and performance during 2020/21. The results of this assessment were as follows:
- 57.58% – delivery delayed by Covid-19;
  - 41.41% – delivery has not been impacted by Covid-19;
  - 1.01% – significant risk of non-delivery due to Covid-19;

#### Self-Assessment of Performance in Meeting Corporate Plan KPIs

15. Directorates provide KPI results against target. The KPI RAG rating is then calculated using a set formula as follows:
- **Red** – KPI result is 10% or more away from target;
  - **Amber** – KPI result is within 10% of target;
  - **Green** – KPI result is on or above target.
16. At the half-year stage (end of Quarter 2), the 115 Key Performance Indicators contained within the Corporate Plan were assessed as follows:
- 37.39% – annual result to be provided at year end;
  - 23.48% – Green;
  - 16.52% – Red;
  - 10.43% – Amber;
  - 6.96% – RAG not appropriate;
  - 2.61% – Not collected due to Covid-19;
  - 2.61% – Data not yet available.
17. Directorates were also asked to carry out a self-assessment of deliverability at year end of the KPI targets contained within the Corporate Plan 2020-23 in order to take account of the impact of the Covid-19 pandemic on services and performance during 2020/21. The results of this assessment were as follows:
- 41.74% – anticipated that the target will be met/exceeded;
  - 24.35% – anticipated that the target will not be met due to Covid-19;
  - 23.48% – annual result to be provided at year end;
  - 5.22% – anticipated that the target will not be met;

- 3.48% – RAG not appropriate;
- 1.74% - Assessment not available due to unavailability of data.

### Assurance Process

18. As part of a corporate process to provide assurance in relation to the assessments and data provided as part of the 2020/21 half-year review, Directorates have undertaken an exercise to self-assess the half-year position taking into account performance data, risk registers, senior management assurance statements and the Month 6 budget monitoring position. The outcomes of these reviews have informed assurance discussions with the Chief Executive and with Cabinet.
19. The half-year review and assessment of performance will also be considered in detail at a meeting of the Policy Review and Performance Scrutiny Committee Performance Panel on 17 December 2020.

### **Reason for Recommendations**

20. To provide Cabinet with an update on the delivery of Capital Ambition as set out in the Corporate Plan, ensure transparency, promote a performance management culture and help identify, where appropriate, improvement actions.

### Financial Implications

21. This report considers the current position regarding performance and action being taken to ensure the effective delivery of Capital Ambition. The 2020/21 budget allocated resources sufficient to deliver Capital Ambition and in the event where there have been changes in assumptions that require further financial resources, then these need to be identified before progressing with the intervention.

### Legal Implications

22. The Well-being of Future Generations (Wales) Act 2015 requires the Council to consider how its decisions and actions will contribute towards meeting the well-being objectives set out in the Corporate Plan and to keep the well-being objectives under review. Members must also be satisfied that the Council is complying with the sustainable development principle, which requires that the needs of the present are met without compromising the ability of future generations to meet their own needs.

### HR Implications

23. There are no HR implications directly associated with this report.

### Property Implications

24. There are no specific Property Implications in this report. The Strategic Estates Department have assisted and advised on property matters within

the wider assessment where necessary.

## RECOMMENDATIONS

Cabinet is recommended to note the half-year assessment of the Council's performance as set out in this report and Appendix A, including the delivery of key commitments and priorities at the end of Quarter 2 of 2020/21, and the actions being taken to ensure the effective delivery of Capital Ambition and the Corporate Plan 2020-23.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Sarah McGill</b> Corporate Director People & Communities
	11 December 2020

*The following appendices are attached:*

**Appendix A:** 2020-21 Half-Year Performance Report – High level summary by Well-being Objective

**Appendix B:** Update against Corporate Plan Key Performance Indicators

**Appendix C:** Update against Corporate Plan Steps

This page is intentionally left blank

# Delivering Capital Ambition

Half Year Strategic Assessment of Performance  
2020-21

## Contents

<b>Cardiff in 2020</b>	<b>Page 3</b>
<b>Well-Being Objective 1 – Cardiff is a great place to grow up</b>	<b>Page 9</b>
<b>Well-Being Objective 2 – Cardiff is a great place to grow older</b>	<b>Page 16</b>
<b>Well-Being Objective 3 – Supporting people out of poverty</b>	<b>Page 20</b>
<b>Well-Being Objective 4 – Safe, confident and empowered communities</b>	<b>Page 24</b>
<b>Well-Being Objective 5 – A capital city that works for Wales</b>	<b>Page 31</b>
<b>Well-Being Objective 6 – Cardiff grows in a resilient way</b>	<b>Page 36</b>
<b>Well-Being Objective 7 – Modernising and integrating our public services</b>	<b>Page 42</b>

## Cardiff in 2020

This section of the report considers some of the major trends impacting the city and provides a wider context for considering organisational performance.

### Covid-19

The emergence of Covid-19 has represented an unprecedented challenge for the Local Authority and its partners, affecting almost every aspect of service delivery; the impact of Covid-19 on the deliverability of the Council’s policy agenda and commitments is therefore considered throughout this report.

Cases over Time: On 16 November 2020, the cumulative number of Covid-19 cases in Cardiff reached 9,473. Figure 1 illustrates Cardiff’s cumulative number since the pandemic began in March 2020.

**Figure 1: Cumulative Number of Covid-19 Cases in Cardiff (as reported on 17 November 2020)**

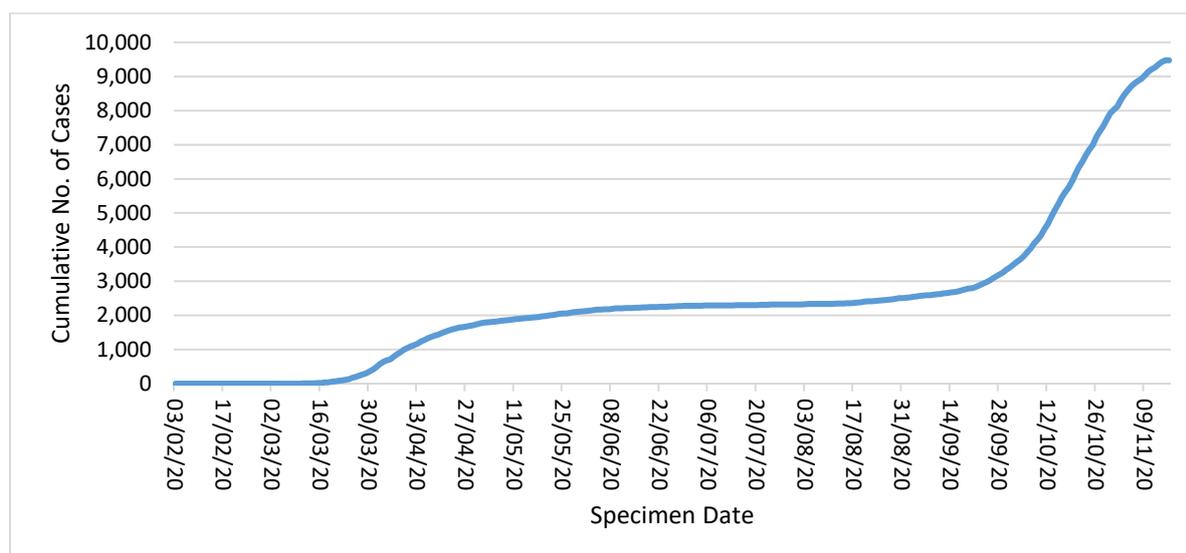
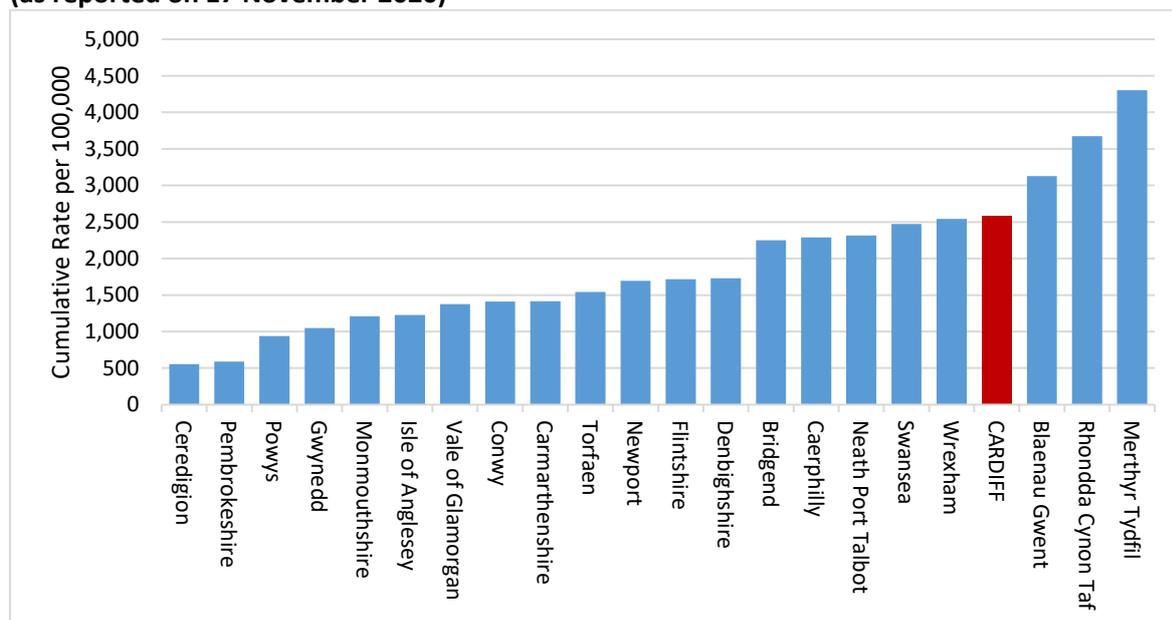


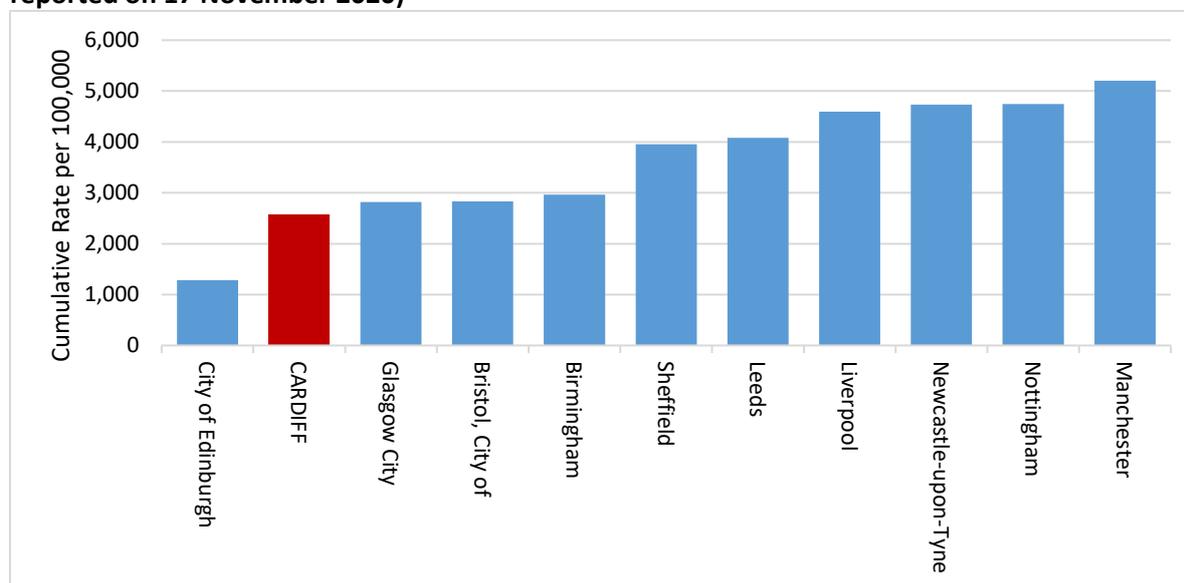
Figure 2 shows cumulative cases in Cardiff, per 100,000 population, compared with other Welsh Local Authorities. Cardiff’s relatively high position can be attributed, at least in part, to Cardiff’s position as an urban local authority and its population density.

**Figure 2: Cumulative Number of Covid-19 Cases per 100,000 Population by Welsh Local Authority (as reported on 17 November 2020)**



Nonetheless, it is clear that Cardiff has fared much better than most Core Cities. When compared to Core Cities across the UK, Cardiff’s cumulative number of Covid-19 cases, per 100,000 population, is low, second only to Edinburgh (Figure 3).

**Figure 3: Cumulative Number of Covid-19 Cases per 100,000 Population by UK Core Cities (as reported on 17 November 2020)**



Responding to Covid-19: The Council has undergone a significant period of change and innovation as it works to continue to deliver services and progress its city development agenda, whilst managing the impacts and implications of the pandemic. In response to both the initial lockdown in March 2020 and the ‘fire-break’ lockdown in October/November 2020, the Council transitioned to an essential services model; this meant that a range of services were either adapted, suspended, or, in some instances, established for the first time.

Where and when necessary, the Council has worked to restart or repurpose Council services to function effectively, sustainably and safely, aligning with UK/ Welsh Government and public health guidance. It is clear that the Council must operate, for the foreseeable future, within the context of mandatory social distancing. This will require a continuation of home working where possible, and continued work to prevent the further spread of the virus whilst planning for potential future 'peaks'.

Moving forward, the Council will also continue to repurpose its services and priorities to contain the spread of the virus, support the most vulnerable and drive forward economic recovery. Work will be undertaken to build on the firm foundations laid with the Test, Trace, Protect (TTP) service, which helps to trace and control the spread of the virus. This includes expanding the service, making sure it has the manpower, the expertise and the technology needed to keep Cardiff safe through the winter.

### **Financial Resilience**

The level of revenue funding announced for 2020-21 represented an improved position compared to the planning assumptions published in summer 2019 in the Council's Medium Term Financial Plan. Whilst the improved funding position for 2020-21 is welcome, the position for 2021-22 and beyond is much less certain.

Major risks to the Council's budget position have emerged, not least the impact of an anticipated recession and the ongoing costs and lost income associated with responding to Covid-19. From the outset, it was clear that the crisis was likely to have significant financial implications for the Council, both in terms of additional costs and loss of income, over the course of 2020-21 and beyond. Within certain directorates, additional expenditure will have been incurred and losses of income experienced. Work is ongoing to establish the full financial impact of the crisis, both in the short- and medium-term.

Many of the underlying budgetary challenges facing the Council also remain. These financial challenges follow a decade of austerity over which time the Council has made almost a quarter of a billion pounds in cumulative savings and reduced the number of its non-school staff by 22%.

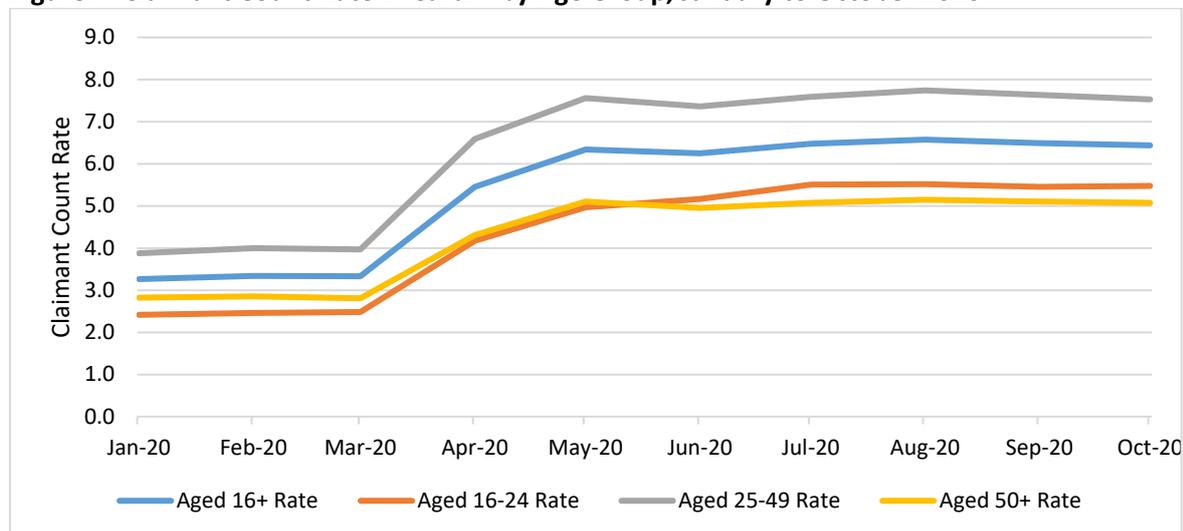
### **Economic Crisis**

In parallel with the Covid-19 public health crisis, the UK is now facing an unprecedented economic crisis. The UK economy is facing the biggest contraction in three centuries with the Office of Budget Responsibility (OBR) projecting that unemployment will be over 50% higher in Cardiff for at least two years.

The economic impact of lockdown has led to young people and those in unsecure work being at the greatest risk of unemployment, since the most affected sectors – hospitality, leisure and retail – are those that employ large proportions of young people. The economic crisis can also be anticipated to hit the poorest areas of Cardiff hardest, entrenching deprivation and increasing the gap in outcomes between communities in the city.

Figure 4 shows the claimant count rate in Cardiff, by age group, from January to October 2020. The claimant count records those individuals who are unemployed and claiming jobseekers allowance or other unemployment-related benefits. There has been a clear rise in claims across all age groups since March 2020, and the onset of the pandemic.

**Figure 4: Claimant Count Rate in Cardiff by Age Group, January to October 2020**



The Council has done all it can to support local businesses, and this will continue to form a key part of the recovery strategy as we move forward. Between April and June 2020, the Council facilitated the provision of £42.8 million to businesses via the Welsh Government’s Business Grants Scheme. Further to this, the Council has worked to repurpose the city centre, and wider local and district centres, to create an environment that is safe, socially distanced, well-managed and welcoming. Adaptations have included pavement widening, cycle routes and speed restrictions, as well as allowing café and bars to create ‘spill out’ areas to trade outside.

The Council will continue to seek the important balance of protecting public health while preventing a protracted economic decline. This includes mobilising a council-wide Economic Recovery Taskforce, to create opportunities and provide a tailored package of interventions for impacted businesses and employees.

### **Brexit**

From 31 January 2020, the UK legally ceased to be a member of the European Union (EU). However, a future relationship/trade agreement between the UK and EU is yet to be decided. Brexit uncertainty therefore continues to affect business planning and investment decisions. Cardiff is particularly vulnerable to a disruptive Brexit, as it is amongst the top five British cities most reliant on EU markets, with 46% of its exports going to EU countries.

Should the UK Government and the EU fail to agree a free trade deal before the end of the transition period on 31 December 2020, the UK would once again face a ‘no-deal’ scenario, in which trade with the EU would be based on World Trade Organisation rules, with most UK goods subject to tariffs. There would also be a range of other implications of the UK leaving

the EU without a deal, which the Council has already taken steps to prepare for, as set out in the Brexit Issues Register.

Potential disruption to supply chains and the local economy, the registration of EU nationals on the EU Settlement Scheme and Council finances are amongst the key Brexit risks facing the Council. Moving forward, appropriate preparations will be put in place, dependent on the outcome of negotiations.

### **Climate Emergency**

Notwithstanding the depth of the Covid-19 crisis, climate change remains the defining global challenge of our generation, with impacts including rising sea levels, flood risk, extreme weather events, unsustainable energy supplies and ultimately, widespread economic instability. These issues are already impacting the Cardiff area and its population; our actions in the coming decade are therefore crucial, as they will define the shape and well-being of our society and our planet for generations to come.

Recognising the scale of this challenge, the Council has declared a Climate Emergency, with the One Planet Cardiff strategy published in October 2020 as a strategic response to this declaration. The strategy analyses the scope and scale of the challenge facing the Council and the city, and highlights the opportunities that could arise from positive action to address this challenge, proposing a wide range of immediate and potential actions that will form the basis of our longer-term response.

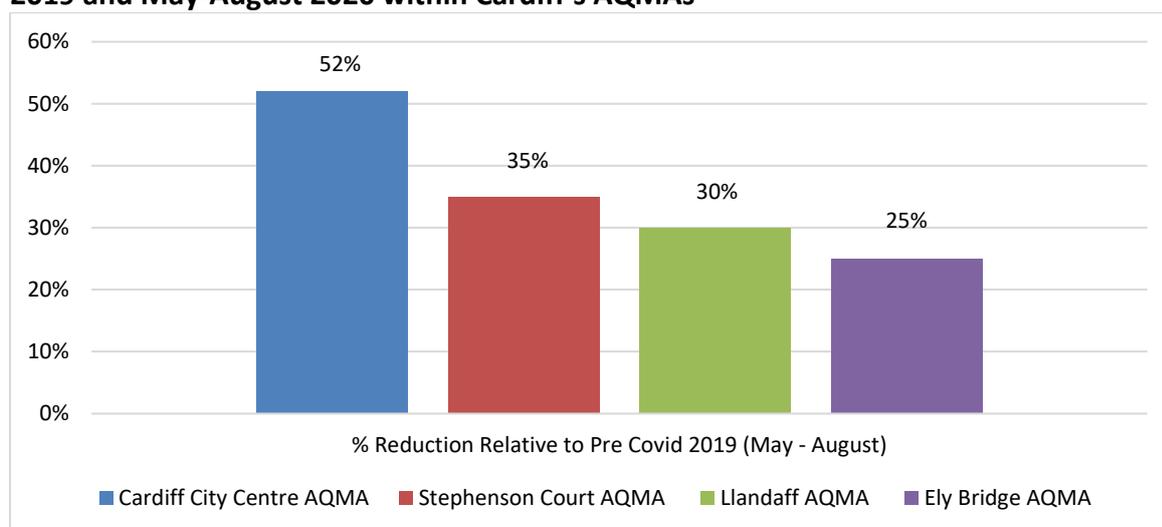
Whilst the development of the strategy coincided with the Covid-19 emergency, it is clear that the Council's response to both emergencies cannot be mutually exclusive. Some indicative analysis has already been undertaken to ascertain what impact the current pandemic has had on air quality levels, especially within Cardiff's established Air Quality Management Areas (AQMAs)<sup>1</sup>. The below chart highlights percentage reductions in average NO<sub>2</sub> concentrations from May to August between 2019 and 2020<sup>2</sup>.

---

<sup>1</sup> Where air quality reviews indicate that a Local Authority's air quality objectives may not be met, the Local Authority is required to designate an Air Quality Management Area (AQMA). Action must then be taken at a local level to ensure that air quality in the identified area improves.

<sup>2</sup> Whilst it is not viewed as a preferable indicator to directly compare to previous years' data given influencing meteorological conditions, the analysis is useful to populate indicative trends/ visualise impacts.

**Figure 5: Percentage Reductions in Average NO<sub>2</sub> Concentrations between May-August 2019 and May-August 2020 within Cardiff's AQMAs**



The One Planet Cardiff strategy highlights projects and opportunities that can further stimulate a “Green Recovery”, with the Council leading a capital city that will be at the forefront of a green and inclusive economy, supporting both environmental and economic recovery in Wales.

### **Inequalities**

The gap between rich and the poor in the city is too wide, and it is growing. Differences in health outcomes are even more pronounced, with a healthy life expectancy gap of between 22 and 24 years between the most and least deprived communities of Cardiff. This deprivation damages too many lives, places pressure on public services and breaks the bonds that help to create a strong society. In addition to economic inequalities, the gap in outcomes for those of different ethnicities, gender and those living with a disability remains too wide.

The Covid-19 pandemic has further exposed the inequalities that exist in our society; during the peak month of April 2020, those from more deprived communities were more significantly impacted by the pandemic, with the mortality rate for the most deprived being twice that of the least deprived. Furthermore, demographic data from deaths across England and Wales shows that mortality rates are higher for men, and for those from Black, Asian and Minority Ethnic groups (BAME). This information is significant for Cardiff, due to the city’s ethnic diversity.

In September 2020, the Council published a new four-year roadmap to promote equality and inclusion in Cardiff, developed following consultation with residents, community groups, Council staff and partners. The strategy aims to remove any barriers caused by inequalities that Cardiff residents may experience and sets out how the Council will seek to achieve these objectives. Additionally, the Council has established a Race Equality Taskforce which will focus on addressing racial inequality in the city. The Taskforce will be responsible for identifying opportunities to implement meaningful and practical changes, which will make a difference for BAME communities and address the well-documented inequalities that still exist in the city today.

## Well-being Objective 1:

### Cardiff is a great place to grow up – Summary

- All children and young people in Cardiff experience high-quality education
- Supporting vulnerable children and families – improving outcomes for all our children

#### Key Successes

##### All children and young people in Cardiff experience high-quality education

Following the national lockdown in March 2020 as a result of the Coronavirus pandemic, all schools closed for statutory education provision and some schools were rapidly re-purposed into hub schools, providing childcare for the children of key workers and the most vulnerable learners. In line with Welsh Government direction, schools re-started on a phased basis in June, and opened full-time for all learners in September 2020. Whilst schools have reopened to all learners, teaching and learning will continue to be affected during the 2020-21 school year. The approaches taken by schools and settings will continue to evolve to provide learning both in school and elsewhere as the need arises.

- A significant collaborative effort between schools and the Council enabled all Cardiff schools to open safely to learners during the phased return in June and at the beginning of the new academic year in September. Rigorous health and safety risk assessments have been completed and are under constant review. Enhanced protocols for confirmed cases of Covid-19 in schools have been established and parental concerns managed sensitively. Free school meal provision has been maintained throughout, using a combination of methods including lunch bags, supermarket vouchers and direct payments.
- School attendance has now improved in all phases when compared to the start of term in September, as confidence builds in returning children to school. However, due to cases of the virus requiring self-isolation, attendance remains lower than at a similar period last year.
- Schools are continuing to develop practices which enable continuity of learning for children and young people who need to stay at home to self-isolate due to the virus. Guidance and support is being provided by Welsh Government, the Council and the Central South Consortium. This includes work with key partners to offer a range of training and support to upskill teachers and pupils in their use of digital technology.

To support continuity of learning, 8,000 devices along with 2,000 4G and Wi-Fi enabled devices to provide broadband access were distributed to schools/ individual households during the summer. A further 10,000 Chromebooks and several hundred iPads will be distributed to schools before the end of the current term.

- Exams and Assessment: Exams in the 2019-20 academic year for Key Stage 4 and Key Stage 5 were cancelled, and results awarded on Centre Assessed Grades. Data collections including Teacher Assessment in the Primary phase were also cancelled. Provisional data

from WJEC shows that results in Cardiff are improved and higher than the national averages.

- Support for vulnerable learners has been and will continue to be at the centre of the Council's approach. This includes establishing a summer holiday programme to ensure young people were supported, the remodelling of provision for Educated Other Than At School (EOTAS) learners including digital deprivation and opportunities for some learners to repeat year 11.
- Learner Voice: The Local Authority and partners have worked together throughout the pandemic to make sure that the voices and needs of children and young people are at the heart of decisions. This includes:
  - Collecting and responding to the views of children and young people through the 'Coronavirus and Me' survey;
  - A webinar and pupil task group to inform reopening of schools and the City Recovery Strategy, and;
  - Conducting a Child Rights Impact Assessments as part of Recovery Planning.
- Good progress is being made to prepare for the implementation of additional learning needs (ALN) reform. 97% of schools were rated very good or strong in relation to strategic preparedness for ALN Reform, compared with a regional average of 85%. School closure period led to the development of more robust multi-agency approaches between health and special schools.
- Schools are continuing to draw on resources to support emotional health and well-being including Thrive, Nurture and Adverse Childhood Experiences. Exclusions this term are lower when compared to the same period last year.
- The Youth Service has seen an increase in access by young people, including through outreach work, street-based youth work and digital networks. During August there were over 250,000 social media hits, nearly 1,500 socially distanced in-person connections and over 580 young people were supported by mentors. The service is contributing to a new multi-agency panel, along with Children's Services and the Youth Justice Service to provide support for vulnerable young people.
- Cardiff Commitment partners supported a range of initiatives over the summer holiday period to assist school leavers with their transition from statutory education. The Youth Service is leading the tracking and one-to-one support for Year 11 school leavers throughout the autumn term. Provisional 'NEET' (not in education, employment or training) figures should be available at the end of Quarter 3. Further interventions are in development including optimisation of the UK Kickstart Scheme, improved access to Post-16 pathways, and enhanced brokerage and support for the most vulnerable learners.
- A new governor recruitment campaign has been launched on social media containing key messages about supporting Cardiff's schools as a governor. Over 100 expressions of interest and 35 completed governor application forms have been received to date. Regular guidance has been produced for governing bodies on their role and priorities

during the pandemic, highlighting the importance of strong governance. Regular webcasts have also been held for chairs of governors to update them on key developments during this time, as well as online governor training opportunities.

### **Supporting vulnerable children and families – improving outcomes for all our children**

The Covid-19 pandemic has significantly impacted the Council's service delivery in the first half of the financial year. Since the beginning of the pandemic, Children's Services has rapidly transitioned to a hybrid model of working, with social worker assessments undertaken virtually where possible, or via other alternative means, such as through windows, in order to maintain social distancing while providing essential support. Due to the risk of further spreading the virus, face-to-face interventions have been reserved for critical situations or instances of safeguarding concerns. The shift towards the use of virtual technology has increased children's and parents' access to support services, and paired with the Council's enhanced partnership working during the lockdown period, has allowed staff members to efficiently, effectively and safely respond to high service demand in a time of crisis.

- Family Help: Despite the impact of Covid-19, the Family Help team has supported 811 people, and is on track to meet the year-end target of 1,500 people. Additionally, 94% of families referred to Family Help have shown evidence of positive distanced travelled, far exceeding the target of 70%.
- Children Looked After: The Council's Vulnerable Learners meetings have been highly effective, enabling information sharing about particularly vulnerable Children Looked After, as well as some children who are on the Child Protection Register. Key discussions have been taking place to identify needs, how they can be met and by whom. In terms of housing placements, with 76% of Children Looked After placed within a 20-mile radius of Cardiff at mid-year, the target has been exceeded, and the year-end target has also been met.
- Fostering Service: The number of children in in-house placements has risen to 110 as of 28 September, compared with 93 on 30 September 2019.
- Children with Additional Needs: A Cardiff Parenting Additional Needs Implementation Plan has been developed to ensure that all elements of the Adults' and Children's Learning Disabilities Service are inclusive and supportive of children with additional needs and disabilities, as well as their parents. The plan also covers skills training for the Cardiff Parenting Service's workforce, so that staff are enabled to meet the increasingly complex needs of children and families.
- Recruitment in Children's Services: Work on addressing the recruitment gap in children's social workers has continued throughout the lockdown period, with improved trends emerging following the successful implementation of the market supplement in April 2020. Other key measures taken include the allocation of a dedicated manager responsible for recruitment, the co-ordination of a recruitment campaign with Golley Slater from May to the end of September and the use of a dedicated website – [Social Work Cardiff](#) – to direct traffic to recruitment. This multi-faceted response has led to a marked

reduction in social worker vacancies from 38.7% in June 2020 to 29.2% in September. While this figure remains above our target, based on new starters due to come into post, it is projected that vacancy levels will continue to decrease in Quarter 3.

- **Mental Health and Well-being:** Three Primary Mental Health Specialists (PMHS) started in post in September 2020 to improve support for young people's mental health and emotional well-being. As part of a new integrated approach, these specialists are now either managing cases directly that have come through the Family Gateway, referring cases onto specialist health services or providing mental health advice to the Family Help or Parenting teams to support them in the management of their cases. Additionally, a review of the referral pathway for the Barnardos Well-being service via the Family Gateway has revealed the success of this approach, with only 2 out of the 223 referrals made so far this year through the Gateway being deemed inappropriate.
- **Engagement for Corporate Parenting:** The Council held consultation sessions with young people to inform its new Corporate Parenting Strategy prior to Covid-19 and has since held further sessions virtually, ensuring that the Council responds to the needs and concerns of one of the city's most vulnerable groups. In total, 22 young people between the ages of 5 and 27 have been engaged in a range of care settings, including children with disabilities, and kinship carers and foster carers have also been engaged.
- **Supporting Young People Into Work:** The Council's Into Work Services has been working closely with the Personal Adviser Service to identify young people for referral. From April to September 2020, Bright Futures received 101 new engagements, of which 16 entered employment, 17 entered education, 40 started training and 18 started a Bright Start work placement. Furthermore, a bid has been submitted to the Department for Work and Pensions for a grant to embed a 'stepping stones' programme of relationship-based activities that will support young care leavers who are not eligible for referral to the Into Work Service into education, training or employment.

## **Key Challenges and Risks**

### **All children and young people in Cardiff experience high-quality education**

The impact of Covid-19 has, by some margin, had a disproportionate impact on the education services, bringing a range of new pressures to bear. Whilst the directorate has responded well to the immediate challenges and ensured that longer-term response plans are in place, the demands and pressures on the service cannot be underplayed.

- **Safe Learning Environment:** Ensuring schools remain safe and open should cases of the virus escalate, and managing any impact on business continuity within schools has represented a critical challenge. Risk assessments remain under constant review.
- **Continuity of learning:** The Local Authority will be required to work closely with the Central South Consortium to support schools and seek assurances that all learners are able to maintain access to quality education whether in the classroom or at home.

- Health and Well-being: Supporting the health and well-being of school staff as they continue to respond to Covid-19 and ensure access to high-quality education represents an ongoing challenge and may require additional support measures.
- Impact on Pupil Progression: Working with the Consortium to mitigate the impact of the lockdown on individual pupil progression, ensuring that effective practices are deployed to enable children and young people to 'catch up', in particular our most vulnerable learners.
- Preparing for the summer 2021 examination series: Following Welsh Government's decision, work will be required to support schools to prepare for and establish teacher-managed assessments.
- Availability of Performance Data: Qualifications data is not to be published or used for accountability purposes in 2020-21, and school inspections are not taking place. A consistent approach to school performance and improvement is required across Wales, including an evidence base to support effective self-evaluation and improvement planning.
- Out of County Placements: Whilst additional specialist places for complex learning needs were secured for September 2020, there continues to be significant pressure for emotional health and well-being places, leading to a significant increase in out-of-county placements.
- School Organisation Programme: Progressing schemes in accordance with the Band B 21st Century Schools Programme of school investment has been impacted by the pandemic.
- Delivery of Asset Management Programme: As a result of the pandemic, the Asset Management programme of works for condition and suitability were delayed as health and safety adaptations were prioritised. A programme of works has been set for 2020-21 and 2021-22 including all high priority (1a) works to be completed by March 2021. All necessary suitability adaptations required for pupils and staff for September 2020 have been completed.

### **Supporting vulnerable children and families – improving outcomes for all our children**

The service is grappling with increasing scale and complexity in terms of demand which, if left unchecked, could have significant impact on service user outcomes and the Council's budget. Ongoing areas of challenges include ensuring the sufficiency of placements, particularly to address the numbers of children placed outside of Cardiff, the numbers of children in residential care and the low numbers of children leaving care.

- Managing an increase in the scale and complexity of demand represents an ongoing risk.
- Children Looked After: Ensuring placement sufficiency and monitoring the numbers of children placed outside of Cardiff and entering residential care remains a priority. The effective implementation of the Children's Commissioning Strategy will be crucial to managing this risk.
- Ensuring Staff Well-being and Provision of Support: The importance of emotional well-being and ongoing support for staff must remain a key area of focus.
- Early Help Services: Due to Covid-19 disruption, the Family Gateway has failed to reach its mid-year target of supporting 3,750 people and is equally not expected to reach the year-end target. Having supported 836 people, the Support4Families Team has fallen slightly short of its mid-year target of 900, however the year-end target is projected to be met.
- Adoption Services: Adoption services have experienced difficulties due to the pandemic, with the percentage of children with a Placement Order not placed for adoption within 12 months of the order remaining far too high at 46%, against a target of 25%, making it likely that that the year-end target will not be reached.
- Additional Learning Needs Support: Work to evaluate the new transition teams in Children's Services has been delayed by Covid-19, however transition workers have continued to make contact with families to ensure that immediate needs are met. The Children and Young People's Strategic Partnership and Disability Futures Programme Board have agreed that focus will be placed on children with disabilities first, and then be widened to cover other issues, such as mental health.
- Support for Young Carers: Innovative approaches to working with young carers have been developed during the Covid-19 period, however the planned launch of the new service to support young carers has been delayed due to arrangements for staff to work from home.
- Poverty in Localities: Work in relation to mapping out the impact of poverty in localities and to identify community resources has been delayed by Covid-19 but will restart shortly now that the responsible manager is back in post, after having been repurposed during the initial stages of the pandemic.
- Youth Employment: The economic impact of Covid-19 on employment opportunities for vulnerable young people is a major concern, particularly for those aged 16-24 who are care experienced and not in education, employment or training (NEET).

## **Forward Look: Areas of Focus**

### **All children and young people in Cardiff experience high-quality education**

- In the short term, keeping schools safe for learners and staff to remain open and protecting their well-being is a priority. This includes supporting schools to manage incidents of the virus, close working with families where there are safeguarding concerns and managing workforce capacity/ business continuity.
- Preparing for Teacher Assessment in the absence of formal examinations.
- Continuing to work with schools and the Consortium to ensure continuity of learning for children and young people out of school, particularly the most vulnerable and making sure that some groups of learners are not disadvantaged.
- Continuing to work towards curriculum and ALN Reform. Whilst there is recognition that schools can work differently as a result of the pandemic, they and other education services must continue to move forward with wider ambitions to achieve the goals set out in Cardiff 2030.
- Progressing schemes in accordance with the Band B 21<sup>st</sup> Century Schools programme of school investment.
- Pursuing opportunities to progress wider strategic commitments as outlined in the Corporate Plan and Cardiff 2030 in the months ahead, including developing a School Workforce Strategy, Community Focused Schools Policy and an integrated model of Youth Support Services.

### **Supporting vulnerable children and families – improving outcomes for all our children**

- Delivering the Youth Justice Action Plan and responding in full to any follow-up on the recommendations from the HM Inspectorate of Probation (HMIP) inspection of Youth Offending Services in Cardiff.
- The renewed Corporate Parenting Strategy is being drafted, informed by good practice from Bristol, Powys and Carmarthenshire, and arrangements are being made for the Strategy to be agreed at full Council in January 2021.
- A needs analysis will be undertaken as part of the Disabled Children's Commissioning Strategy, which will inform the strategic direction for respite provision in the future. This work will feed into a business case setting out the proposal for how the building should be used to meet the needs of disabled children and young people. It is proposed that the timescale for this work be extended to September 2021.

## Well-being Objective 2:

### Cardiff is a great place to grow older – Summary

- **Work with people with care and support needs, helping them to live the lives they want to lead**
- **Become a Dementia Friendly and an Age Friendly City**

#### Key Successes

#### Work with people with care and support needs, helping them to live the lives they want to lead

Across Wales, shielding was introduced between March and August 2020 to protect those considered most at risk of serious harm from coronavirus. Those required to shield due to pre-existing conditions and their level of vulnerability resulted in increased numbers of Cardiff's older population requiring additional care and support. Shielded people were instructed to avoid contact with those from outside their household, and not to leave their homes, even to buy food and other essentials.

- Supporting Those Who Are Shielding: The Council led on the local distribution of food parcels to shielded individuals who were unable to access essentials via another route and managed the high volume of calls and enquiries regarding additional support. This support also included the co-ordination of volunteers to collect prescribed medication, and advice on accessing priority online shopping delivery slots.
- Ensuring the Safety of Staff and Service Users: The need for personal protective equipment (PPE) and hygiene supplies was recognised as a key priority for the Council in responding to Covid-19. This ensured that both Cardiff Council staff and Cardiff's social care providers had ready access to the equipment they needed to keep themselves and their service users as safe as possible. Initial arrangements allowed for staff and care providers to collect equipment from locations across Cardiff and the process advanced to allow for deliveries to be made to social care providers. Since March 2020, over 10 million items of PPE and hygiene supplies have been distributed, with the vast majority of this volume being used to support social care providers and vulnerable people.
- Safe Hospital Discharges during the Pandemic: Hospital social workers have linked in with community teams and care providers to work through complex cases in order to discharge individuals from hospital. This work has continued in line with the 'home first' principle. To support the discharge process during the pandemic, isolation beds were secured by Adult Services for those who have left hospital, the primary purpose of these being to keep individuals who may be infectious from spreading Covid-19 to their care home as they return to it. In total, 26 of these beds were secured.
- Supporting Hospital Discharges: Work has been undertaken to strengthen the Multi-disciplinary Team (MDT) within the Single Point of Access to reduce delayed discharge and this continues to be supported by the First Point of Contact Hospital team (the 'Pink

Army') and wider MDT in the hospital. This work continues to feed into the enablement team to support people moving back home.

- Older Persons Housing Strategy: Work continues to deliver the Older Persons Housing Strategy despite delays caused by Covid-19. Plans for Broadlands Court have been finalised with the residents and planning consent has been achieved for the Maelfa and St. Mellons independent living schemes, both of which are out for tender.
- Tackling Social Isolation: Virtual platforms are being developed to help address social isolation and enhance quality of life of older people within the constraints created by Covid-19. Virtual meetings have been put in place for individuals with dementia who previously would meet in community centres, enabling them to continue seeing familiar faces and maintain invaluable social interaction. Online approaches have also been established for users of the Ty Canna service and disability service to provide ongoing support for those at high-risk of social isolation. Engagement plans are in place in relation to the restart and creation of support groups as restrictions are lifted.

### **Become a Dementia Friendly and an Age Friendly City**

- A new Dementia Friendly Cardiff website has been launched, aimed at providing a 'one-stop shop' of valuable information about services and support in the city to assist people living with dementia to live well in the capital. Dementia Friendly Cardiff is a partnership between Cardiff Council, Alzheimer's Society Cymru and Cardiff & Vale University Health Board.
- Over 150 locality-focused dementia awareness events have been held throughout the city in the first two quarters. Digital options are being explored to hold further events, given the limitations on being able to deliver classroom-based practical training.

### **Key Challenges and Risks**

- Impact of Covid-19 on Older People: Additional focus will be required on supporting and protecting vulnerable individuals in care homes across the city and those receiving domiciliary care. Statistics show that in the early stages of the Covid-19 pandemic, Cardiff experienced proportionally more deaths in care homes (35% of Covid-19 deaths) than the Welsh average (28%) and the English Core Cities average (32%). While examining deaths from Covid-19, and excess deaths when compared to the normal expected death rate, those receiving domiciliary care were identified in Cardiff as having a high excess mortality rate, along with care homes.
- Cost Pressures: The Covid-19 pandemic has added to the already significant demographic and cost pressures on Adult Services. The projected end of year position for Adult Services is an over-spend of £1.059 million.

- Impact of Covid-19: Delayed Delivery

Delayed Roll-out of Improvements to Hospital Discharge Arrangements: An ‘Asset Based Approach’ has been developed to reduce the number of people experiencing failed or delayed discharge from hospital, however the roll-out of these improvements has been delayed due to Covid-19. A new deadline of March 2021 has been established for this model of support to be implemented.

Delayed Home Condition Evaluations for Trips, Slips and Falls: During the initial onset of the pandemic, all home visits were put on hold apart from those deemed critical, and support moved to remote phone calls or video calls. The effectiveness of this approach has its limitations as it is not possible to accurately evaluate an individual’s home conditions or their associated levels of safety from trips, slips and falls. Services have begun returning to a business as usual position, however as the frequency of face-to-face home visits begins to return there is clear risk of staff contracting Covid-19. A number of questions relating to Covid-19 symptoms are asked prior to a visit being arranged and these are asked again prior to entry of a property. For new clients and where the information given may be unreliable, staff must assume a high level of risk and wear appropriate levels of PPE.

Delayed Roll-out of Dementia Friendly City: Numerous activities to develop Cardiff as a Dementia Friendly City have been suspended during the Covid-19 pandemic. Work to encourage businesses to become more Dementia Friendly has paused, and as businesses across the city seek to recover and adjust to the requirements of Covid-19, retaining a focus on Dementia Friendly may prove difficult. School engagement programmes have not been undertaken due to the risk around introducing external staff into school settings.

- Service Resilience: As Covid-19 cases across Cardiff and Wales begin to rise, there is a risk that staffing levels may be impacted upon and may not be sufficient to meet service demand, particularly as the frequency of face-to-face visits is increasing. A series of measures will be adopted to allow a flexible approach to staff deployment, to increase focus on business continuity planning, to utilise community and volunteer capacity if deemed safe and appropriate, and to closely monitor staff numbers required to isolate or testing positive for Covid-19. Issues of staffing and meeting demand will also be experienced by the wider social care marketplace.
- Market Sustainability: Service providers have been sustained financially through Covid-19 grants but are running at under occupancy. Weekly meetings are being held with care providers to understand potential capacity issues and financial measures have been put in place to support the financial viability of providers during the ongoing pandemic. Many third sector or voluntary groups are at risk and this creates a potential increase in demand on statutory services.
- Social Isolation: The impact of social isolation and loneliness on the well-being of older people will have been exacerbated during the pandemic. Activity to address social isolation by building links between citizens, groups, organisations and private businesses

has not been undertaken during this period due to the social distancing requirements, demographic risks and other limitations associated with Covid-19.

- The number of Council staff undertaking Dementia Friends training across the Authority remains well below the 100% compliance target for Council staff by April 2021. Achieving this target will be further hindered by the number of staff across the Council remaining on furlough.

### **Forward Look: Areas of Focus**

- Working with colleagues from Cardiff & Vale University Health Board to enhance models of support and further join up social care, health and housing.
- Making sure that individuals are enabled to return home safely as soon as they are fit and healthy and to empower people to remain independent at home. Key areas of focus include:
  - Rolling out the 'Asset Based Approach' model of support and care by March 2021.
  - Establishing a new model of residential reablement. The tender period for this closed in October 2020.
  - An update on the commissioning arrangements for the future delivery of care at home (domiciliary care and sessional support) to be considered by Cabinet in Quarter 3. Existing contact arrangements have been extended to 1 April 2021.
- Adapting services working to reduce social isolation to enable them to operate in the current climate. Independent Living Services are focused on digital inclusion for the older community, including signposting community groups to sources of funding for devices.
- Responding to the increased need and demand for social care services as a result of the Covid-19 pandemic. Previously constructed plans to 'shift the balance of care' prior to the Covid-19 crisis will be reviewed, and assumptions revised as the Council and its partners move through a period of stabilisation and reconstruction.
- The Adult Strategy for Social Services is currently on target to go to Cabinet in May 2021, with engagement events planned for November and December 2020

## Well-being Objective 3: Supporting people out of poverty – Summary

- **A Living Wage City**
- **Help people into work**
- **Tackle homelessness and end rough sleeping**

### Key Successes

#### A Living Wage City

- Increased Number of Living Wage Employers and Employees: Acting as an advocate for the Living Wage, Cardiff has increased the number of employees working for an accredited Living Wage employer. There are now 117 accredited Living Wage employers in Cardiff with nine new employers becoming accredited during the first two quarters of 2021, including Cardiff & Vale University Health Board. There are now 48,691 people working for an accredited Living Wage Employer and 7,131 workers have received a pay rise as a result of their employers becoming Living Wage accredited this financial year.

#### Help people into work

The Council has effectively integrated employment support services from across the city. The Employment Gateway brought together over forty employment services to help support people to get and to keep a good job. The Council has also worked with local employers to identify the skills they need their staff to have and then ensured that appropriate training is provided.

- Into Work Services has incorporated Cardiff Works (the Council's in-house employment agency) and Adult Learning, creating wrap-around support and pathways into permanent employment. This ensures that referrals and outcomes between the services are seamless for those looking for work or to improve their digital skills. In response to the emerging economic challenges, the service has enhanced its capacity to provide support. In total the service is now able to support more than 55,000 clients and 250 employers annually.
- Enhancing Cardiff Works: Following a full review, a proposed way forward for Cardiff Works was approved by Cabinet in September 2020. The process of modernisation and enhancement includes digitalisation of the service; streamlining of recruitment processes; increased accessibility of the service, with a full-time, face-to-face presence at Central Library Hub; and greater visibility in the community, including attendance at jobs fairs and job clubs alongside Into Work Services.
- Supporting Recruitment within the Council: During the Covid-19 pandemic, Into Work Services have supported large-scale Council recruitment activities (with bespoke training packages added) including home carers and Test, Trace, Protect. To date, 148 people are in post with 46 recruited from mentoring projects and 68 through the Employment

Gateway. At the end of Quarter 2 the number of paid apprentice and trainee opportunities across the Council was 104, well on track to meet the annual target of 125. Close contact has been kept with Directorates during the pandemic to ensure that apprentices and trainees are being utilised effectively and that their learning is continuing.

- Breaking down the digital barriers to work: A publicity campaign about Into Work Services has been launched. The campaign is now at the halfway point, with over 1m views on online channels leading to nearly 3,000 new clients accessing the Into Work website <https://www.intoworkcardiff.co.uk>. An Into Work mobile app has also been developed to keep jobseekers up to date with training and employment opportunities. For those who are not able to access digital services, the roll-out of a tablet gifting scheme has recently begun.
- Support for care leavers: Bright Futures, the Council's scheme to help care-experienced young people into education, employment or training, was fully launched at the beginning of 2020 and has continued to operate during the pandemic. During the first two quarters of 2020-21, Bright Futures supported 16 young people into employment; 17 into education; 40 into training and 18 into a Bright Start work placement. A referral scheme has also recently been set up; staff at the Jobcentre can now refer young people who are interested in the new UK Government Kickstart scheme for a robust 'better off calculation' carried out by the Council's Money Advice Team.
- Access to Advice and Support: The number of clients supported and assisted with their claims for Universal Credit is only marginally below the half-year target of 750 at 743. This demonstrates the increased need for support at this time, even when face-to-face services have been less available.

### **Tackle homelessness and end rough sleeping**

The Council had some success in tackling homelessness and rough sleeping prior to the Covid-19 pandemic. In March 2020 the number of people sleeping rough on the city's streets was at its lowest level for six years. Closer partnership working and innovative projects such as Housing First were already seeing positive outcomes. Due to the onset of the Covid-19 pandemic, the service has faced unprecedented levels of challenge. To support the response, Welsh Government made available £10 million for Local Authorities with a further £20 million available to transform homelessness services and ensure that no-one need return to rough sleeping. The scale and pace of service adaptation has ensured that a number of vulnerable people have been effectively supported during the pandemic and a new approach is currently being progressed in this area that responds to the challenges of Covid-19.

- 'Real Change' Campaign: This was launched at the end of June 2020 and aims to embed the achievements made by homelessness services during the pandemic into a long-term approach, to lock in the benefits realised and lessons learned from the crisis.
- Homelessness Services post-Covid: A report to Cabinet on 16 July 2020 outlined the impact of Covid-19 on the homeless population of Cardiff. The report noted the steps already taken to secure additional permanent homeless accommodation to replace

temporary provision and to ensure that no service user will experience a reduction in service availability as lockdown measures are relaxed. Cabinet approved the provision of further accommodation and support for single homeless people and families, the direct award of a contract to deliver temporary accommodation units for families at the Gasworks site in Grangetown, and additional measures to deliver the new model of homeless provision in Cardiff.

- New Premises: In order to close the hotels commandeered during the pandemic and move clients into appropriate accommodation, 42 self-contained units for those with medium-support needs opened at Ty Casnewydd in September 2020.
- Housing First: The Housing First model, which seeks to ensure that individuals have safe accommodation first before looking at the underlying causes for their homelessness, has been expanded to 55 units, an increase of 15. 93% of clients utilising Housing First have experienced a successful outcome.
- Partnership Working: The Multi-Disciplinary Team has expanded with an additional three therapeutic workers to be recruited, bringing the total to six in the team. A Probation Officer has also been recruited and funding has been secured for a psychologist and occupational therapist. The pandemic provided an opportunity for improved joint working with prisons, particularly surrounding referrals for early release prisoners and improvements to the prisoner pathway including access to Housing First.

### Key Challenges and Risks

- Economic Downturn: The economic impact of both Covid-19 and Brexit is likely to lead to an increase in poverty, unemployment and homelessness. Funding has been received for a further expansion of Into Work Services, however it is anticipated that the increased demand for advice services may outstrip supply.
- Reduced support for residents: At the same time as demand is expected to increase, restricted Hub openings and lower engagement with Advice and Into Work Services due to Coronavirus restrictions are making it harder to provide support to people living in poverty. Relatively few people (213) have been supported into work in the first half of 2020-21 given an annual target of 850.
- Homelessness: Demand for homelessness services are currently suppressed and the end of the ban on evictions is anticipated to have an impact from January onwards. The risk of the virus spreading among rough sleepers has led to a change in the emergency accommodation provided – all accommodation must now be self-contained with shared sleeping places heavily reduced in order to comply with Covid-19 restrictions. The pandemic has slightly delayed the pilot of the new assessment and triage centre which will act as a co-ordination point with both health and homelessness services on site.

- Responding to Covid-19 has placed additional financial pressure on services:
  - The Advice & Benefits section have a projected overspend of £146,000. This is due to a number of factors, including irrecoverable Covid-19 expenditure and a reduction in internal income against the Cardiff Works budget.
  - Funding has been made available for this year to manage the transition to the proposed new way of working with single homeless people and an application has been submitted to cover costs. However continued funding will be required, if services are to remain in place and the progress made to date in addressing homelessness is to be maintained.
  - The Council Tax Reduction Scheme has seen a significant increase in expenditure due to the economic downturn. At the midway point of the year, the full contingency allocation of £3.042 million would be required to cover costs.

### **Forward Look: Areas of Focus**

- Enhancing and modernising Cardiff Works to fully align with Into Work Services, tailoring support to ensure that candidates are helped to become 'Cardiff Works ready'.
- Embedding a 'stepping stones' programme of relationship-based activities in order to support young care leavers, who are ineligible for referral to Into Work Services, into education, training or employment. A bid has been submitted to the Department for Work and Pensions for a grant to deliver this.
- Continuing to tackle homelessness and end rough sleeping through increasing the current Housing First team and opening new sites such as the pilot Cardiff Assessment Centre, 47 self-contained units at Baileys Court and converting the current family hostel at Adams Court into a specialist supported accommodation for single clients with complex needs.

## Well-being Objective 4:

### Safe, confident and empowered communities – Summary

- **Work to end the city’s housing crisis**
- **Invest in local communities**
- **Create safe and cohesive communities**
- **Ensure children and adults are protected from risk of harm and abuse**
- **An inclusive and open city**
- **Promote the Welsh language**
- **Improve sports and leisure**

#### Key Successes

##### Work to end the city’s housing crisis

- New Council Homes: For the first time in a generation, new Council homes are being built to reduce the number of people on the waiting list and tackle the city’s housing crisis. To date, 381 homes have been delivered, including 65 this financial year and, whilst Covid-19 has delayed delivery of the overall target, it is expected that over 500 homes will be completed by March 2021.
- Improving the Standards of Private Rented Homes: As well as delivering new homes, a revised Rent Smart Wales Memorandum of Understanding (MOU) has been developed in consultation with Local Authority partners and Welsh Government to drive up standards in the private rented sector and the city’s high-rise buildings.

##### Invest in local communities

- Neighbourhood Regeneration: Strong communities rely on access to local services and healthy local economies and so the Council is working with its partners to design and deliver a wide range of regeneration schemes across the city. As part of a series of whole neighbourhood regeneration projects, the Lower Llanrumney scheme is now on site and designs are being developed for the Trowbridge Green and Pennsylvania estates. Progress also continues to be made on a three-year programme of smaller regeneration projects across the city. Environmental improvements to Cathays Road and in Riverside have been completed and consultation has been carried out on three further schemes – Llanishen Street, Llanishen Park and Cowbridge Road East. 94% of residents responding to surveys have been satisfied with completed regeneration projects to date.
- Community Hubs: As part of the Council’s Hubs programme, work has been completed on the Butetown Creative Hub and Whitchurch and Rhydpennau Hubs now provide an improved offer following a programme of refurbishment. Options are being explored for a Youth Hub in the city centre. The Maelfa Health and Well-being Hub is close to being ready, and the design and operation of a new domestic abuse one-stop shop in the Cardiff Royal Infirmary is also being progressed in partnership with health and third sector partners.

- Shared Regulatory Services: The Shared Regulatory Services partnership between Cardiff Council and Bridgend and Vale of Glamorgan County Borough Councils has adapted to be at the forefront of monitoring and enforcing Covid-19 restrictions in businesses and has played a key role in Test, Trace, Protect. As well as supporting businesses to re-open, the service has played a crucial role in challenging the adequacy of measures put in place to manage the behaviour of customers. Work has also included market surveillance of hand sanitisers and face masks that have been supplied as PPE which resulted in several brands of hand sanitiser being identified as ineffective against viruses including Covid-19.
- Volunteering: The 'Together for Cardiff' initiative, hosted on the Council's Volunteer Cardiff website, saw over 1,000 people volunteer to help deliver food and medical supplies to the most vulnerable at the beginning of lockdown in March. High levels of volunteering have continued. In Quarter 1, levels of volunteering were more than ten times higher than this time last year. Visits to the website have far exceeded expectations with 87,190 hits by the end of Quarter 2.

### **Create safe and cohesive communities**

- Community Safety: Through the city's Community Safety Partnership, the Council and its public and private sector partners have played a central role in the city's response to Covid-19, working as one team to safeguard the well-being of residents. Key areas of partnership working have included supporting those at risk of homelessness, adapting services to continue to support victims of domestic abuse and the re-opening of public spaces to promote social distancing and compliance with Covid-19 regulations.
- Support for migrant communities: The Council has also worked with the Welsh Local Government Association to co-ordinate support for migrant communities in the city. This has included supporting a local immigration advice charity to provide legal advice to those whose immigration status is uncertain and which could place them at additional risk to the economic and health impacts of Covid-19.
- Youth Justice Service: In June 2020, "All Our Futures", a new Youth Justice Services Development Strategy, was launched in response to performance challenges identified in the city's Youth Justice Service. A highly-experienced Chair of the Youth Justice Management Board has been appointed. Strengthened partnership governance structures have been put in place with the Board reporting progress directly into the Cardiff Public Services Board and a new Quality Assurance framework developed.
- PREVENT Strategy: As a priority area for the Home Office's PREVENT Strategy, Cardiff has secured funding for PREVENT projects which will build capacity at the community level. The funding is also supporting projects to ensure partners understand the threat posed by far-right groups and how to protect people from radicalisation online.

## **Ensure children and adults are protected from risk of harm and abuse**

- **Exploitation Strategy**: A joint Child and Adult Exploitation Strategy has been published to reflect new and emerging themes of child and adult exploitation such as modern slavery. Links have been made with the Youth Justice Service and Early Help Service. Work is underway with partners to develop the idea of contextual safeguarding, recognising that outside of the family unit, the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.

## **An inclusive and open city**

- **EU Settlement Scheme**: The Council is supporting EU citizens to apply to the EU Settlement Scheme by 30 June 2021 including providing digital support to access the scheme online.
- **Race Equality Taskforce**: The Council has established a Race Equality Taskforce to address racial discrimination and promote race equality in the city in collaboration with public sector partners and major employers in the city.

## **Promote the Welsh Language**

- **Annual Report**: The Welsh Language Standards Annual Report 2019-20 and associated Bilingual Cardiff Action Plan was approved by Cabinet and Council in September 2020.
- **Welsh-medium Education**: The Council has been awarded a capital grant of £6 million from Welsh Government to increase Welsh-medium school provision and promote the Welsh language. As well as plans to expand Ysgol Y Wern and establish new Cylch Meithrin provision and dual-stream provision to serve the Plasdŵr development, Welsh-medium primary school provision for Central Cardiff has been approved and will be progressed in autumn 2020.
- **Tafwyl**: This year, the Tafwyl Welsh language festival went online extending its reach to a global audience. The annual celebration of Welsh arts and culture held in June was viewed from as far as the USA and Japan, with more than 8,000 tuning in to enjoy digital content. During a worrying time for the arts, the festival provided essential cultural output and industry support when it was most needed.
- **Street Naming Policy**: Work continues to introduce new Welsh street names across the city following the introduction of Cardiff Council's new Street Naming Policy in October 2019, which ensures parity between Welsh and English street names in the city.

## **Improve sports and leisure**

- **Parks and Green Spaces**: The number of the city's parks and green spaces achieving the Keep Wales Tidy international mark of quality continues to rise. Fourteen parks and green spaces have achieved the Green Flag standard, Forest Farm Country Park and Hailey Park both receiving the award for the first time. One green space, Llandaff North Allotments, maintained the status Green Flag community award. The Council's parks and green

spaces are also benefiting from a major playground refurbishment programme, with a wide range of projects being delivered across the city.

- Move More, Eat Well Plan 2020-23: The Cardiff and Vale ‘Move More, Eat Well Plan 2020-23’ has been launched by Cardiff’s Public Services Board to support behavioural change toward a healthier and more active population and develop resilience to health crises such as Covid-19. Alongside this, Cardiff’s Sport, Health and Physical Activity Strategy will be developed to maximise the use of the city’s parks, green space and leisure centres to increase participation in physical activity and improve the health of our communities.
- Lisvane and Llanishen Reservoirs: Construction work has now been completed on the restoration of Lisvane and Llanishen Reservoirs with the prospect of this becoming a destination for walking, water sports and a space for improving residents’ mental and physical health. The planning application for the visitor centre is due to be submitted in autumn 2020 and the refill of the reservoir is expected to take place in spring 2021.

### Key Challenges and Risks

- New Council Homes: Whilst progress has been made, the timescale for delivering the first 1,000 new Council homes has had to be delayed by seven months to December 2022 due to the emergence of Covid-19.
- The continued impact of Covid-19 on local and community services: Although visits to libraries and Hubs have increased from 25,000 to over 140,000 since April, this is less than half of the average monthly footfall prior to Covid-19. With Hubs and libraries only able to provide limited services, this is having a community-wide impact in terms of access to services and the health and well-being of residents. The Council is also losing income due to events not being held. However, an underspend of £115,000 is projected in relation to Hubs and Community Services, due to the in-year supplies and services savings.
- Shared Regulatory Services: Shared Regulatory Services (SRS) is a key partner in Test, Trace, Protect (TTP) and has seconded a number of its officers to play key roles in its delivery. Although SRS has been able to deliver elements of its business plan, the service is currently recruiting staff and contractors to backfill some of the vacant posts within the service created as a result of TTP, to attempt to return to a “business as usual” position.
- Crime Trends: In the first few months of the pandemic there was a drop in the overall crime rate and across most types of crime, compared with the same time last year. There was a significant increase in anti-social behaviour, but this was mainly due to breaches of Covid-19 regulations. As Covid-19 restrictions eased over the summer, there were a number of small increases across a number of crime types including public order and hate crime. Levels of anti-social behaviour in Quarter 2 were also up on the same time last year but not to the same extent as in Quarter 1. However, with Wales experiencing its second lockdown, there is the risk of compliance fatigue which may impact compliance trends.

- Domestic Violence: It is likely that Covid-19 lockdowns and restrictions will have resulted in under-reporting of domestic violence. The volume of domestic abuse referrals received is being closely monitored through the work of the Community Safety and Safeguarding Partnership Group.
- Safeguarding Training: Whilst over two-thirds of Council staff have now completed the training, this remains short of the target for this key corporate performance indicator. Work to address this has been delayed due to redeployment to assist with the response to the pandemic and many staff shielding do not have access to the Council network to complete the training. Directorate self-assessments have been issued for return early in Quarter 3 and a safeguarding awareness video is to be launched shortly.
- EU Settlement Scheme: EU nationals can apply to the EU Settlement Scheme to continue living in the UK after 30 June 2021. Individuals will need to be living in the UK by 31 December 2020 to apply with the application deadline set for 30 June 2021. The risk that support from the Council and its partners does not reach more vulnerable EU nationals has increased due to Covid-19, as face-to-face engagement has not been able to take place. For those EU nationals who do not apply by the deadline, there could be issues around eligibility for public services. A Council officer has been recruited to lead the co-ordination of support for EU nationals and an immigration advice charity, Asylum Justice, has been assisted by the Council to secure additional funding to enhance legal advice provision in Cardiff. Funding has also been made available to support the applications of Children Looked After and Children's Services have designated leads to oversee this work.
- Community Cohesion: Although Cardiff is an open and inclusive city, tensions between communities could increase as the Covid-19 crisis continues to have an impact on the lives and livelihoods of residents. The UK's departure from the European Union from 31 December 2020 could also exacerbate these tensions particularly with the threat of increased activity by far- and extreme right-wing groups. Throughout lockdown and during recovery, the Council has supported tension monitoring and mitigation activity in partnership with South Wales Police and Welsh Government and this will continue.
- Youth Justice Service: Following a review of the service by the HM Inspectorate of Probation (HMIP) in January 2020, significant progress has been made with the launch of the new youth justice service strategy 'All Our Futures' and the new governance arrangements in place. A follow up assessment has been scheduled.
- High-rise Buildings: Since the tragic events at Grenfell Tower, Shared Regulatory Services, South Wales Fire & Rescue and residents' groups have made progress in addressing the issues relating to some buildings, but a number of buildings continue to require attention. Residents of these buildings currently have to pay for the work and this will continue to be the case unless additional funding is provided by Welsh Government. The Council continues to work to resolve this issue and the issue has been raised with Cardiff's Public Services Board.

- Provision of Leisure Services: Falling attendance and membership figures due to Covid-19 restrictions has placed pressure on all leisure operators. A review of Council provision delivered through its operating partner will be required.
- Parks and Green Spaces: The health and vibrancy of our parks and open spaces as spaces for community well-being rely on the work of volunteers. Much of this work has been put on hold as many volunteers fall into the vulnerable demographic group and therefore under Covid-19 social restrictions. Friends Forums and community-based platforms are anticipated to start up again in the autumn.

### Forward Look: Areas of Focus

- Investing in homes and communities: Progress will continue to be made on the ‘Cardiff Living’ housing scheme, delivering new energy-efficient homes, better connectivity to green spaces and facilities, and improved sustainable transport networks. The planning application for the Channel View scheme in Grangetown will be submitted in December 2020 following public consultation.
- New Hubs Website – Adapting to Covid-19: A new website was launched in October, bringing together information on services provided in Hubs across Cardiff, such as Advice Services, Adult Learning, Into Work Services and Library Services. The site will also detail all events taking place. The events will be delivered online until restrictions are lifted.
- EU Settlement Scheme: A review of all live cases within Children’s and Adult Services is to be undertaken to ensure that all eligible cases have been identified and are supported to apply by the deadline.
- New Serious Violence Bill: The Council is working in partnership with South Wales Police and its newly-established Violence Prevention Unit to develop an enhanced preventative approach to tackling violence and organised crime. In advance of the implementation of a Serious Violence Bill, this will include supporting a Home Office and Violence Prevention Unit evaluation of current approaches to address Serious Violence and Serious Organised Crime and participating in a review of current partnership arrangements across South Wales in November. The evaluation will inform proposals around future governance arrangements and violence prevention initiatives.
- Continue to Improve Our Parks and Green Spaces: As part of the response to the Climate Emergency, the Council is working with partners to increase Cardiff’s tree canopy, enhance biodiversity and provide environments which support improved health and well-being of local residents. In addition to working in partnership with the Woodland Trust and Trees for Cities, projects are being developed following a grant from Natural Resources Wales to Public Services Boards in Wales. Projects include identifying opportunities for public sector land to contribute to increasing the tree canopy in Cardiff from 19% to 25% by 2030 as part of the Coed Caerdydd project and expanding the “Greening the Council Estate” project, installing green walls in areas of poor air quality. Projects will also identify opportunities for improving natural habitats and growing food, benefiting biodiversity as well as health and well-being.

## Well-being Objective 5: A capital city that works for Wales – Summary

- **Lead a capital city that works for Wales**
- **Continue the development of the city**
- **Support innovation and business development**
- **Bring world events to Wales and take the best of Wales to the world**

### Key Successes

#### Lead a capital city that works for Wales

Cardiff's central role in the Welsh economy continues to grow in importance, with the capital city creating 20,000 net new jobs over the past two years and five out of every six new jobs in Wales over the past five. The unprecedented challenge of Covid-19, however, means that the city must now grapple with both a public health and an emerging economic crisis. The Council has moved swiftly to support businesses during this period whilst working to repurpose the city centre as a Covid-secure environment.

- **Direct Funding Support:** Approximately £80 million has been allocated to around 6,000 local businesses over the course of the pandemic.
- **Covid-Secure Public Spaces:** Beyond direct funding support to businesses, the Council's innovative new public space and outdoor seating area, the Castle Quarter, has allowed the hospitality industry in the city centre to continue trading within the confines of continued social distancing regulations. This initiative has generated approximately half a million pounds for the local economy and drove a sharp rise in city centre footfall during the month of August, when the city centre had 620,000 visitors, compared to 395,000 in July and 70,000 in April. Additionally, in July, the Council established Memorandums of Understanding with many hospitality businesses in the city centre, allowing them to apply for temporary outdoor seating, which 90% of surveyed businesses reported had been crucial in saving their business.
- **Economic Recovery Task Force:** A Recovery Taskforce – bringing together Economic Development and Into Work Services including Adult Community Learning – has been established to support those who have recently lost their job due to Covid-19 into new employment, help employers recruit and train, and more broadly, to lead the post-Covid economic recovery in Cardiff.
- **City Development:** Despite the significant impact of Covid-19, good progress continues to be made in positioning Cardiff as the leading force in a growing city-regional economy. Funding has been secured for the development of a business case for Cardiff Central Station's regeneration, and with UK Government and City Deal funding already in place to deliver the capacity improvements at the station, the Council is playing a key role in developing the transport connectivity needed to build a dynamic and productive economy.

- **Job Creation:** Over 700 new jobs have been created, meaning that the position at the end of Quarter 2 has already exceeded the annual target by 40%, and the overall combined target for jobs created and safeguarded exceeds the Quarter 2 target by 60%.

### **Continue the development of the city**

- **Dumballs Road:** The Dumballs Road regeneration scheme continues to progress with the agreement of a land transfer to Vastint, representing another step towards delivering over 2,000 affordable homes, commercial and retail space and improved connection between the city centre and Cardiff Bay.
- **Cardiff Parkway:** The planning application for Cardiff Parkway has been progressed, a key component of the Industrial Strategy for the East, which will deliver a new train station, a new business park and real economic opportunity for this long-overlooked area of the city.

### **Support innovation and business development**

- **Creative Industries:** The Council supported a Cardiff University-led Strength in Places (SIP) bid to UK Research and Innovation (UKRI) to support research and development in the screen and creative industries in Cardiff and the region. This industry has been significantly affected by the pandemic and ensuring a successful recovery and supporting innovation in this sector will be key to the future success of the local economy.
- **Business Infrastructure:** Work to expand the city's business infrastructure has continued, with support from the Town Centre Loan Fund secured to develop new facilities for fin-tech businesses.

### **Bring world events to Wales and take the best of Wales to the world**

- **Supporting Cultural Venues:** Throughout the pandemic, the Council has worked to secure funding support for St David's Hall and the New Theatre, and recently secured over £3m from the Arts Council of Wales who administered the Cultural Recovery Fund and the Capital Recovery Fund. This funding will help to ensure that Cardiff's internationally renowned live music and theatre offer will be supported during the current crisis.

## **Key Challenges and Risks**

### **Impact of Covid-19**

- **Unemployment and Business Closures:** The number of people claiming unemployment benefits doubled in Cardiff between January and September 2020, with the threat of business closures a real possibility. Many national department stores have already announced closures, and city centre footfall has once again fallen dramatically due to

renewed lockdown measures, putting many local retail and hospitality businesses at risk of closure.

- **Cultural Sector:** Continued lockdown restrictions on cultural venues and tourist attractions have left them unable to generate income since the end of March. The Council will therefore need to review its approach to supporting the city's cultural venues over the coming year and develop an innovative new policy response. Work will continue to develop a Cultural City Compact approach, however its implementation is likely to be delayed until 2021-22, as the Council has initially focused on supporting the cultural sector in surviving the impact of the pandemic.
- **Attendance at Council Venues:** Attendance at Council venues remains well below target, with 79,546 visits at the end of Quarter 2, against an annual target of 595,000. Whilst this issue pre-dates the pandemic, the ongoing public health restrictions have significantly exacerbated the problem, leaving the Council largely unable to drive improvement in this area of challenge for the time being. Additionally, the Council's Tourism Strategy and delivery arrangements have been delayed to reflect the impact of Covid-19 on the local tourism market.
- **Major Events:** Progress on the development of the Events Portfolio has been disrupted by Covid-19 restrictions. In terms of major sporting events, the Guinness Pro 14 Final, originally set to take place in June 2020, was cancelled by the organisers, and work to assess the feasibility of a 2030 FIFA Football World Cup bid has been delayed due to a focus on addressing the immediate effects of the pandemic. Cardiff's cultural events portfolio has also suffered a significant setback, with the new signature music event for the city, the 'Cardiff Music City Festival', postponed from October 2020 until autumn 2021 due to ongoing public health restrictions. The Music Strategy being developed by the Cardiff Music Board has also been delayed into the post-Covid world. Despite these major challenges, Council officers continue to support and work with Welsh Government, through the Wales Event Advisory Board and monthly event planning meetings, to identify and consider future opportunities in this key sector for the city.
- **Delayed Delivery:** The Council has continued to collaborate with developers to progress work on major city development projects, namely Central Square, Central Quay, Capital Quarter and Callaghan Square, which will significantly increase the city's offer of premium office space and create the dynamic environment needed to attract new businesses, albeit in the face of the current economic headwinds. Additionally, the next phase of development for the International Sports Village has been delayed due to Covid-19, and its procurement process will not commence until early 2021.
- **Brexit:** Brexit uncertainty continues to affect business planning and investment decisions, and Cardiff is particularly vulnerable to a disruptive Brexit, as it is amongst the top five British cities most reliant on EU markets, with 46% of its exports going to EU countries. The Council has been working with partners to signpost businesses to the information and support available to them in responding to the imminent impact that Brexit may have on their competitiveness.

- **Future of Regional Funding:** The future of structural funds – a major source of economic investment for South East Wales – remains an ongoing area of uncertainty, as the UK Government is yet to confirm the amount of funding Wales will be allocated from the Shared Prosperity Fund, nor at which level of government EU replacement funds will be administered. Funding from the EU has been a significant financial contributor to regional and local economic development in Wales, especially outside of Cardiff, with per capita funding far exceeding that in Scotland, Northern Ireland or England, making any changes to regional funding post-Brexit a significant risk for Wales. Given the nature and scale of the disadvantage in certain areas of Cardiff, the Council will work to ensure future funding arrangements more accurately reflect inequality across the region and the levels of deprivation within the city.

### **Forward Look: Areas of Focus**

- The Cabinet will consider the appointment of its preferred bidder for the Indoor Arena in Cardiff Bay, marking a significant step forward in the delivery of the last major missing piece of infrastructure in the city's culturally-focused economic regeneration programme of the last two decades.
- The Canal Quarter masterplan will be finalised upon the conclusion of the Indoor Arena procurement process, which will see a long-overlooked part of the city centre transformed into a dynamic area, with a new public square surrounded by the uncovered dock feeder canals of Cardiff's industrial past.
- A final masterplan for the future vision of Cardiff Bay's development will be presented to Cabinet in December 2020. The procurement process for the next phase of the International Sports Village's development, the centrepiece of this vision, will commence in early 2021.
- Vastint, the developer for the Dumballs Road regeneration project, will submit a planning application for this crucial new development early in 2021.
- A proposal for the creation of a Science Park Campus at Coryton, developed by the Council in partnership with City Deal partners, the private sector and the University Health Board, is currently being considered by City Deal, and funding has been approved by the Cardiff Capital Region (CCR) Cabinet to develop the proposition.
- From 2021, Corporate Joint Committees (CJC) will become an important new feature of the regional economic development policy landscape in Wales. The Welsh Government has already published draft regulations for the establishment of a CJC for South East Wales, covering the local authorities in the Cardiff Capital Region City Deal, which will be a distinct corporate body with the power to employ staff and hold budgets. CJs will exercise functions relating to Strategic Development Planning and Regional Transport Planning and will also have the power to promote or improve the economic well-being of their regions. Cabinet will consider its response in December.

- Over the coming year, the Western Gateway, a cross-border strategic partnership with Cardiff and Bristol at its core, will play a key role in attracting the level of inward investment to Cardiff from the UK Government and private sector that has been seen in the North of England in recent years, namely in infrastructure, education, Research and Development and new businesses. More broadly, the Western Gateway will help drive the inclusive and green economic growth that will define the post-Covid era and position the South Wales/West of England region at the centre of the national Climate Emergency response. The partnership's full vision document will be released later this year, following the completion of an Independent Economic Review.

## Well-being Objective 6:

### Cardiff grows in a resilient way – Summary

- Work as one team, keeping our streets clean
- Make Cardiff a world-leading recycling city as a core part of our response to climate change
- Lead Cardiff's low-carbon transition
- Promote and instigate sustainable flood risk management
- Put sustainability at the heart of our plans for Cardiff's future development
- Lead a transformation of Cardiff's public transport system, alongside promoting more active forms of travel

#### Key Successes

##### Work as one team, keeping our streets clean

- A robust management response and reform programme was developed to address longstanding issues within waste management and street scene. These include the establishment of new management arrangements and a focus on performance management, including a data-led approach to service development and problem resolution. Progress was also made in relation to workforce reforms by addressing concerns relating to collections around bank holidays, permanent staff recruitment and improvements in workplace Health and Safety arrangements. Continued focus will be required to ensure that this reform programme delivers sustained improvement.
- Cleansing Services: Additional resources have been allocated to the inner ward areas of Cathays, Plasnewydd, South Riverside, Grangetown and Splott for the provision of cleansing services.
- Work has also been progressed in relation to 'unloved spaces', which are spaces on the highway that are licensed to the community for local people to improve them; however, Covid-19 restrictions have meant that group gatherings have not been possible in recent months and the litter picking kits that are usually provided in Hubs have not been accessible.
- Volunteer groups like Cardiff Rivers Group are working safely in line with the controls that have been put in place in response to Covid-19 to undertake activities like cleansing around the edge of Cardiff Bay.

##### Make Cardiff a world-leading recycling city as a core part of our response to climate change

- Policy-driven improvements continue to be progressed to address significant operational issues leading to performance, budget and public perception challenges. Work has also progressed in relation to the reform programme, permanent staff recruitment and a significant improvement in workplace Health and Safety arrangements.

- Service Innovation: A booking system was introduced for the city’s two Recycling Centres in order to enable them to re-open safely at the end of May 2020. In addition, a booking system for bulky item collections was launched on 9 September 2020 on both the Council’s website and Cardiff App. The new booking system and controls at Recycling Centres have supported improving recycling performance to 90%.

### **Lead Cardiff’s low-carbon transition**

- The One Planet Cardiff Strategy was approved for public consultation by the Cabinet in October 2020.
- Overall air quality has improved significantly in accordance with the Welsh Government timescales; however, further development of the Castle Street scheme is required. There is ongoing dialogue with the Welsh Government about any revision to the Castle Street scheme to ensure that compliance can still be achieved in the shortest possible time. Air quality monitoring stations have been installed at five locations in the city centre, including a permanent monitoring station on Castle Street, with live data being captured from early August 2020.
- The Lamby Way Solar Farm structure has been completed. Connection to a nearby electricity consumer via a private wire connection is scheduled to commence mid-September, but is dependent on Natural Resources Wales granting flexibility around some ecological constraints. An embargo on works in the Rumney estuary has been imposed by them. Discussions are taking place about potential additional flexibility but if they are not successful, this will delay the private wire completion until April 2021. Until this connection is made, the energy produced by the solar farm will go to the National Grid.
- A Food Strategy Steering Group and Food Growing Plan task & finish group have been formed to support the delivery of the Cardiff Food Strategy: Recruitment to a three-year post to support the implementation of the Council’s Food Strategy was put on hold due to the budgetary impact of Covid-19.

### **Promote and instigate sustainable flood risk management**

- Ground investigation works for the coastal defence improvements in Cardiff East were completed by the end of May 2020. The final business case and detailed design work is being completed to enable the commencement of construction works; however, environmental conditions for the construction works are difficult, together with the need for agreement/licences to be obtained from Natural Resources Wales before entering the River Rumney estuary.

### **Put sustainability at the heart of our plans for Cardiff’s future development**

- Green Infrastructure Plan: A working group has been established to prepare a project brief for the development and delivery of a Green Infrastructure Plan, taking into account existing resources and other priorities in the context of the ongoing Covid-19 pandemic.

- Grant and loan funding have been secured for the Heat Network scheme and the procurement process for this project is ongoing, with initial bids expected to be submitted by the end of September 2020.

### **Lead a transformation of Cardiff's public transport system, alongside promoting more active forms of travel**

- Central Interchange Transport Hub and Central Station: The working relationships with the Cardiff Capital Region City Deal, Transport for Wales and Welsh Government have enabled agreement on investments in the Central Interchange Transport Hub and Central Station. Governance and working arrangements for Cardiff Council to engage in discussions with Transport for Wales (TfW) and TfW Rail have been established. The overarching business case for the Metro, including the Cardiff Core Metro/Cross-rail, is being developed. Potential key issues include timely delivery of Metro improvements and extension aspirations in Cardiff. This is being mitigated through the Governance structure and programme of study work.
- Safe Cycle Network: Work to develop a new fully segregated, safe cycling network across the city is ongoing. The North Road Phase 2 scheme has been completed, phase 2 of Cycleway Way 1 consultation completed, Hailey Park consultation completed and solution agreed with Members; detailed design commenced. Contracts have been let for both phase 1 of Cycleway 4 and the Gold Pop-up Route and work on both sites commenced at the end of September.
- Active Travel Network Map: Technical work for the initial draft Active Travel Network Map is in progress with a statutory submission date of September 2021.
- 20mph zones: Plans have been developed for 20mph speed limits to be implemented in Splott, Butetown, Canton/Riverside, Llandaff, and Creigiau with Traffic Regulation Orders processes underway. Initial scoping work with Welsh Government has commenced to assist on an evaluation pilot of processes to inform guidance on a future 20mph default speed limit in built-up areas.
- E-bikes infrastructure planning is underway to locate 125 bikes in key appropriate locations across the city. The focus will be on connecting the Bay with the city centre in the first instance.
- Active Travel Plans by 2022: 64 schools have been supported to develop Active Travel Plans during Quarter 1 and Quarter 2 of 2020-21. Further to this, 660 bicycles have been provided to over 30 Cardiff schools with funding from Welsh Government. This fleet of bicycles will be housed in on-site containers on school sites making them easily available for balance bike training and National Standards Cycle Training activities. A further phase of bikes is being planned for other schools and schools have been invited to express their interest to receive a new bike fleet.
- Living Streets: A pilot study focusing on Plasnewydd has been completed. A community group, drawing from the membership of existing community groups in Plasnewydd and

Roath/Penylan areas, has been established by. The Living Streets report identified a number of measures such as ‘parklets’ (pop-up amenity spaces – seating, planting areas – provided on street) and de-cluttering of street furniture which could potentially be delivered as part of Covid-19 interventions, in particular, the potential Pop-Up segregated cycle route running along the Albany Road corridor which is currently being investigated.

### Key Challenges and Risks

- One Planet Cardiff: Detailed delivery planning required to identify funding requirement, delivery capacity and implementation profile to effectively progress the strategy.
- Statutory recycling targets: Household waste and recycling collections completely changed during the period 22 March to 6 July 2020 due to the initial lockdown: food and recycling were collected at the same time as general waste, and garden waste collections reduced from fortnightly to once every five weeks. These changes dramatically reduced the number of collections planned and undertaken. As such, Quarter 1 figures would in no way be reflective of normal operations, and therefore would not provide a useful comparator with previous years. Work continues to take place with Welsh Government, Waste & Resources Action Programme (WRAP) and local partnerships to review how Cardiff can achieve the Welsh Government target of 70% by 2024-25 after falling short of the statutory target in 2019-20. A new service model for waste and recycling collections is expected to be delivered in February 2021. This includes moving to a four-day working model where waste is collected between 06:00 and 15:45.
- Public Transport: The impact of lockdown and the requirements of social distancing has had a major impact on public transport, particularly municipal bus companies. Scrutiny panel members were reassured by the current approach being taken to minimise the financial risks to the Council, following the meeting of the Covid-19 Scrutiny Panel on 23 June 2020, with a package of support measures subsequently agreed at the October meeting of Council.
- Delays to the Bus Retrofit Scheme as a result of the state aid notification process and the impact of Covid-19 has meant that the intended October 2020 completion date will be delayed.
- Central Transport Services are intending to review the wider Council fleet with Welsh Government Energy Service/Ultra Low Emission Vehicles (ULEV): Following this review a revised timetable will be known or the delay period to the original plan. Potentially pushed back by one year. Further review with Welsh Government Energy Service will enable a more robust assessment on vehicle and infrastructure requirements at Council locations.
- The timescale for delivery of phase one of the new Canal Quarter scheme has been delayed due to the impact of Covid-19: Detailed design work is being progressed to ensure that a high-quality and environmentally-sound scheme is developed that can complement and integrate with the city centre masterplan.

- The Local Development Plan (LDP) Review Report: The LDP Review Report and Delivery Agreement were due to be considered by Cabinet and Council in March 2020; however, due to the Covid-19 pandemic, these meetings were cancelled. The Welsh Government has since issued guidance in July 2020, which states that Local Planning Authorities should consider the implications of the pandemic for LDP reviews. Approval of these documents for submission to Welsh Government would then trigger the formal commencement of the LDP review process. Given the delay to the review of the LDP, the date for completion of the full review of the LDP is now 2024 in the proposed timetable that will be considered by Cabinet and Council in November 2020.
- Confirmation on an enhanced funding package to support taxi drivers to switch to ULEV from Welsh Government is being awaited. Currently, the date of the revised policy introduction is not known and will be dependent on future discussions with the taxi trade. The revised taxi scheme has been further assessed and reported to Welsh Government and a decision on this is awaited before it can be launched with the trade. The Welsh Government is unlikely to provide any funding for any transition of Euro 6 vehicles as this is against the policy direction of Zero Emission fleet by 2028. Covid-19 has severely impacted the trade and further implementation of Euro 6 policy will be met with strong opposition from trade.
- Flood Risk Management: The development of a sustainable water, flood and drainage strategy for Cardiff by 2021 has been put on hold for 12 months due to the ongoing impact of the February 2020 storms on the work and resources of the Flood Risk Management Team, as well as ongoing demands relating to the impact of Covid-19.
- Covid-19 programme delays and project delivery capacity a risk to major infrastructure programmes. These issues will need to be mitigated by reprogramming to take account of Covid-19, and merging of schemes with Recovery Projects. Sourcing of agency staff and consultancy support is also being pursued.
- Financial Resilience in Civil Parking Enforcement: A reduction in income has significantly impacted ongoing financial resilience in the directorate. Over £5m of income supports the delivery of services across Planning, Transport and Environment.
- Regional Development Plans and Regional Transport Plan requirements under Corporate Joint Committees.

### Forward Look: Areas of Focus

- The Council will need to set out its response to the consultation on Corporate Joint Committees and the regionalisation of aspects of land-use planning and strategic transport.
- The draft LDP Review Report and Delivery Agreement are being revised to take account of the implications of Covid-19, particularly in relation to consultation and engagement methods in the context of potential new waves of infection and the need to maintain

social distancing. These revised documents will be considered by Cabinet and Council with consultation planned for January and February 2021 and a further report to Cabinet and Council seeking approval for formal commencement in spring 2021.

- Consideration and agreement required on the next phase of the District Heat Network.
- Results of the One Planet Cardiff Consultation to be considered in March 2020.

## Well-being Objective 7:

### Modernising & Integrating Our Public Services – Summary

- **Deliver fewer and better Council buildings**
- **Rebuild and reform our public services so that they can meet the challenges of the 2020s**
- **Use the power of the public purse to deliver social progress**
- **Deliver our ambitious Digital Strategy**

#### Key Successes

##### Deliver fewer and better Council buildings

- **Covid Secure Buildings:** A key part of the Council's response to the pandemic has been repurposing its buildings to create Covid-19 secure environments. Extensive work has been undertaken by the Council's Health & Safety team to risk assess each Council premises to achieve physical distancing. The work has included ensuring safe access and regular cleaning of high-contact surfaces and provisions of hygiene supplies. This has enabled staff to continue delivering business critical operations from Council premises, provide key services whilst also creating a working space for those with physical or mental health requirements that prevent them working from home
- **Covid Safe Services:** Each service has completed an assessment checklist, highlighting risks in relation to interaction with the public, colleagues, contractors as well as the use of equipment and travel in work. Following on from this, risk assessments have been completed for each service area to ensure that controls that are in place which accord with both Council policy and national guidelines.
- **Core Office:** Long-term core office proposals are being developed as part of the development of the wider property strategy. The Council recognises that significant parts of its office estate are outdated, in poor condition and in need of investment and modernisation. The office footprint will need to reduce to reflect the changing size and shape of the organisation and as it embeds and enhances some of the positive changes to working practices that have been implemented in response to the Covid-19 pandemic.

The Council has mapped its service area requirements as part of its Restart and Recovery strategy for corporate offices. The vacation of Willcox House forms part of the core office strategy and the long-term aspirations of enabling office-based staff to operate in a more agile way.

##### Rebuild and reform our public services so that they can meet the challenges of the 2020s

- **Adaptive HR Support:** To respond to the challenges of Covid-19 and support an effective response, the Council has introduced new and adapted existing HR policies. This has ensured that staff have the clarity, support and flexibility needed to deliver effectively, and has included new special leave allowance and homeworking guidance.

- Corporate Health Standard: The Council continues to work towards the Corporate Health Standard, adapting to the impact social distancing measures have had on face-to-face health and well-being interventions through Occupational Health. Increased support for mental health and well-being has also been provided during the pandemic through changes to the Carefirst contract and re-directing in-house face-to-face counselling services to virtual support groups for key workers.
- Enhance Health and Well-being Provision: Further support mechanisms have been put in place for those shielding/ self-isolating such as welfare contacts with staff, mental health and well-being sessions and workforce risk assessments for those returning from self-isolation. This has been alongside virtual physio sessions and DSE support for those working from home.
- Sickness Absence: Over the last six months, there has been a marked reduction in sickness absence. The Quarter 2 sickness outturn forecast suggests an end of year position of 7.66 days per full-time employee (FTE) against a target of 9.5 day per FTE; these figures include any Covid-19 related sickness. This is an improvement of 3.43 FTE days compared to the same forecasted period in 2019-20.

The percentage of short-term sickness has decreased by approximately 10% when compared to the same period in 2019-20. This equates to a reduction of around 8,500 FTE days. This can be attributed to a number of factors including an increase in the numbers of staff working from home, a number being allocated special leave due to Covid-19, the furloughing of staff and compliance with social distancing and enhanced hygiene practices.

- A Council That Reflects Its Communities: Work has continued throughout the pandemic to promote the Council as a workplace to under-represented groups. Whilst face-to-face work experience has not been possible due to Covid-19 restrictions, work is being undertaken to develop virtual work experience to provide alternative opportunities to young people.
- The Equality & Inclusion Strategy 2020-24 has been approved, which outlines its response to the impact of Covid-19 on different communities and the extensive work that Cardiff is carrying out to create a fairer and more inclusive Cardiff.

#### **Use the power of the public purse to deliver social progress**

- Socially Responsible Procurement Policy: The Council continues to support the foundational economy through the implementation of its Socially Responsible Procurement Policy, ensuring that local people and communities benefit from the money the Council spends on goods and services.
- The Social Value Framework and Social Value Portal has been established, with the TOMs (Themes, Outputs and Measures) for Wales being launched in November, which Cardiff have played an active/leading role in developing.

## Deliver our ambitious Digital Strategy

- The Council has progressed its digital agenda at pace and scale during the first half of the financial year.

Online Services: During the first six months of the year, 924,412 customers contacted the Council via digital channels, approximately 400,000 more digital contacts compared to the same period in 2019-20. The Cardiff App has also seen a significant increase in the number of citizens downloading it; at the end of Quarter 2, 32,467 citizens had downloaded the Cardiff App, around an 8,000 increase on the 2019-20 figure. This enables online engagement on issues such as Council Tax and waste at a convenient time.

Automation of Services: The Council's 'Chatbot' was launched at the end of the 2019-20 financial year as part of the Council's work to improve digital access. The initial launch saw high volumes of contacts; however in April the 'Chatbot' was taken offline and relaunched to enable improved conversation scenarios and enquiry responses. Since then the Council has seen the 'Chatbot' reach is 30,000<sup>th</sup> conversation. This is based on approximately 3,500 conversations a month with 81% of customers rating their experience as very good, good or ok. Further services continue to be developed and Quarter 2 saw the deployment of free waste bag ordering.

Agile Working: The shift towards agile and home working has progressed at pace through the first half of the year. Approximately 500 new laptops and tablet type devices were procured to increase the number of staff who can work from home or alternate locations. Alongside this, 5,500 users were converted to the use of Microsoft Teams, as Skype for Business was phased out. Further functionality has been released in Microsoft Teams and SharePoint Online to improve the user experience and enable collaborative work cross-directorate and with external partners.

## Key Challenges and Risks

- Financial Resilience: The Council continues to face significant ongoing financial pressures as well as the financial implications of Covid-19, with many areas having significant additional expenditure as a result and others facing loss of income. Certain assumptions have been made regarding the extent to which these costs and income losses can be recovered via the Welsh Government Hardship Fund for Local Authorities. However, work continues on both short- and medium-term financial plans with directorates in relation to the planning and delivery of efficiency savings. Enhanced service planning has been undertaken in a number of areas grappling with strategic challenges to ensure clear accountabilities, metrics and targets.
- Governance: Ensuring that the corporate responsibilities that the Council has in terms of Insurance, Procurement, employment, fraud and cyber security are maintained during periods of crisis management and the shift to online working.

- Sickness Absence and Staff Well-being: Sickness absence remains a longstanding area of challenge for the Council, and whilst the forecasted outturn position looks very positive, it is vital that the proactive and strengthened management practices that have been put in place are maintained and built upon. The Quarter 2 figures show evidence that short-term sickness continues to fall with a 10% decrease over the last 12 months, however, long-term sickness continues to account for over 80% of all Council staff sickness.
- Assets and Property: The new property strategy is being developed, informed by the core office accommodation approach. The need for buildings to be Covid Safe will need to be taken into consideration in these strategies, along with the relocation of staff and services from Willcox House.

### Forward Look: Areas of Focus

- Directorates must continue to review the risks associated with responding to Covid-19 from a service planning perspective. This must include financial, service and workforce planning.
- Home and Agile working: The development of the Agile Working Strategy will provide an opportunity to capture some of the productivity, efficiency and well-being gains achieved to date by enabling a more permanent shift to home or agile working as the default mode of operation for many staff. This will tie in with the core office proposals and the new property strategy. Other areas will need to be considered as part of this model, including:
  - Digital Infrastructure, ICT equipment and virtual processes;
  - Staff Terms and Conditions;
  - Staff Well-being (Physical and Mental);
  - Management Support and Performance Management Arrangements.
- Progress the delivery of the Digital Strategy: Further implementation of services offered via the 'Chatbot', alongside the further development of the Cardiff App, enabling citizens to interact by their preferred means at their preferred time.

**Quarter 2 Technical Appendix – Steps 2020-21**

**Well-being Objective 1**

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
<p>Promote and fulfil children’s rights by becoming a Unicef Child Friendly City by 2021, with work including:</p> <ul style="list-style-type: none"> <li>• Ensuring all Cardiff schools are designated as Rights Respecting Schools;</li> <li>• Developing a ‘Passport to the City of Cardiff’ which will guarantee that every child can access a broad range of extra-curricular experiences across the city.</li> </ul>	<p>Cllr Sarah Merry</p>	<p>Education &amp; Lifelong Learning</p>	<p>Cardiff is progressing to become a Child Friendly City where all children and young people have an equal chance to thrive and reach their potential.</p> <p>Throughout the Covid-19 pandemic, partners have worked together to make sure that the voices and needs of children and young people are at the heart of decisions.</p> <p>This includes:</p> <ul style="list-style-type: none"> <li>• Collecting and responding to the views of children and young people through the ‘Coronavirus and Me’ survey including the Webinar and Pupil Task Group to inform reopening of schools and City Recovery Strategy;</li> <li>• Developing a survey for staff about knowledge of children’s rights;</li> <li>• Ensuring that the rights of children and young people are taken into account during the re-start of key services, and;</li> <li>• Child Rights Impact Assessments as part of Recovery Planning.</li> </ul> <p>Developing inspiring and authentic learning experiences for children and young people remains a priority in light of the challenges faced. A range of curriculum projects are being developed including a ‘Passport to the City of Cardiff’.</p> <p>As at October 2020, 65 schools have completed Bronze in the Rights Respecting Schools Programme. 16 of these schools have</p>	<p>G</p>	<p>G</p>		

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
			also received Silver and 3 have received Gold. 95 schools have registered.				
Deliver the new schemes in accordance with the Band B 21st Century School Programme of school investment between April 2019 and 2024 to: <ul style="list-style-type: none"> <li>• Increase the number of school places available;</li> <li>• Improve the condition of school buildings;</li> <li>• Improve the teaching and learning environment.</li> </ul>	Cllr Sarah Merry	Education & Lifelong Learning	Plans for the next phase of investment in the school estate, Band B, were delayed due to Covid-19 until October. A review of Band B is underway to assess the budget shortfall and achieve maximum value for money with the funds available.  Update on schemes: <ul style="list-style-type: none"> <li>• Fitzalan: Enabling works in process and due to complete June 2021, main project due to go to planning Nov 2020, subject to permission granted the primary contractor to be awarded in the new year 2021.</li> <li>• St Mary the Virgin: Tender documents prepared and final business case drafted for submission for funding. Awaiting approval to proceed.</li> <li>• Proposals for provision to serve Adamsdown and Splott is due to return to Cabinet for consideration in 2020-21 academic year for further consultation</li> <li>• Proposals for provision to serve Cathays, Plasnewydd, Gabalfa and neighbouring areas is due to go to Cabinet for consideration in 2020-21 with a view to seeking permission to consult</li> </ul> Working towards the safe operational re-start of schools for all pupils in September has been a priority. This includes priority works, health & safety checks and adaptations to support social distancing.	A	A		
Work with developers to deliver up to eight new primary schools and two new secondary schools as part of the Local Development Plan for Plasdŵr and St Edeyrn's	Cllr Sarah Merry	Education & Lifelong Learning	Proposals determined to open new primary school provision on both North West (Plasdŵr) and North East sites (St Mellon's CiW relocating and expanding on new location as part of the St Edeyrn's development) from September 2022.	A	A		

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
Deliver enhancements to the school estate through a two-year programme of asset renewal and target investment in schools that require priority action by March 2021.	Cllr Sarah Merry	Education & Lifelong Learning and Economic Development	<b>Economic Development Update – Amber</b> The Covid-19 lockdown meant that very little work could be undertaken in the first quarter of this year. However, a significant amount of work to implement the priority schemes was undertaken over the summer period in Quarter 2 comprising 112 schemes with an estimated value of £9.2m. Teams are now working on the delivery of the next batch of priority schemes for implementation by 31st March 2021.	A	A		
Re-shape and enhance specialist provision and services for pupils with additional learning needs to ensure sufficient, high-quality provision is available to meet the current and projected need from 2019 to 2022.	Cllr Sarah Merry	Education & Lifelong Learning	Despite the constraints arising from Covid-19, good progress is being made to prepare for implementation of additional learning needs (ALN) reform. Early years processes are in place and work has begun to introduce Individual Development Plans for some school-aged pupils. The multi-agency 16-25 Transition Protocol has been agreed as a working draft.  97% of schools rated Very Good or Strong in relation to strategic preparedness for ALN Reform, compared with a regional average of 85%. School closure period led to the development of more robust multi-agency approaches between health and special schools.  Additional specialist places for complex learning needs were secured for September 2020, although there continues to be significant pressure for emotional health and well-being places, leading to a significant increase in out-of-county placements.	A	A		
Support Cardiff schools to draw on Cardiff's unique context as the new Curriculum for Wales is introduced for all year groups between 2022 and 2026, including piloting joint working between schools, higher education and employers by 2022.	Cllr Sarah Merry	Education & Lifelong Learning	Welsh Government timelines for implementing Curriculum for Wales 2022 are unchanged.  Exams in the 2019-20 academic year were cancelled as a result of the Covid-19 pandemic. Results have been awarded on Centre Assessed Grades rather than Standardised Grades, where this grade is higher. Qualification awards data will not be used to	A	A		

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
			<p>report on attainment outcomes at a school, Local Authority (LA) or regional level. WJEC data shows that Cardiff results exceed the Wales average for all three published pass rates. At GCSE, more than 3 in every 4 grades is above a C grade.</p> <p>At A-level, almost 95% are A*-C and almost half A*-A. Welsh Government have commissioned a review of the 2019-20 exam series.</p> <p>WJEC November 2020 and January 2021 examinations currently due to go ahead as planned.</p> <p>WJEC have published GCSE and AS/A Level subject adaptations booklets for assessments in summer 2021. In addition, the Summer 2021 provisional exam timetable has been published including a contingency period starting from end of June 2020.</p> <p>Learning and teaching will continue to be affected during the 2020-21 school year. The approaches taken by schools and settings will continue to evolve to provide learning both in school and elsewhere if the needs arises. The balance between learning in schools and settings and time spent learning elsewhere may well change at particular points in response to the pandemic. This challenge requires schools to adapt their curriculum planning to be flexible and responsive to changing circumstances.</p> <p>The LA is working with the Central South Consortium to support schools in their development of teaching and learning (including blended learning) for their own contexts signposting national and local guidance and professional learning.</p>				

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
			The Central South Consortium Continuity of Learning guidance including isolating group scenarios has been published. Webinars to facilitate the sharing of good practice across schools are also being developed.				
Invest in digital infrastructure, equipment and new learning technologies for schools to support the implementation of the Curriculum for Wales in 2022.	Cllr Sarah Merry	Education & Lifelong Learning	<p>Supporting remote learning via digital technologies has been a priority during the pandemic.</p> <p>In excess of 8,000 end user devices (Chromebooks &amp; iPads), along with 2,000 4G Wi-Fi devices to provide broadband access were distributed to schools/individual households during the summer. A further 10,000 Chromebooks and a few hundred iPads will be distributed to schools before the end of this term.</p> <p>The long term aim is to ensure every child in mainstream schools from Year 3 onwards will have individual access to a Chromebook. In addition, there will be separate approaches for foundation phase and special schools based on the needs of pupils.</p> <p>We are working with key partners to offer a range of training and support to schools to ensure we can make the most of this investment by upskilling teachers and pupils in their use of digital technology.</p> <p>We are also putting in place a central structure which has a holistic approach to ICT and will provide technical support, infrastructure deployment and curriculum development for all schools across the city.</p>	A	A		
<p>Improve the physical and emotional well-being of learners through the Healthy Schools scheme, with initiatives including:</p> <ul style="list-style-type: none"> <li>Relationships and Sexuality Education – development and launch of a Healthy</li> </ul>	Cllr Sarah Merry	Education & Lifelong Learning	The Healthy Schools team have continued to support schools in improving the well-being of learners since they re-opened to all pupils in September.	A	A		

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
<p>Relationships Education Directory and resources on menstruation and sustainable period products;</p> <ul style="list-style-type: none"> <li>Promotion of Healthy Eating – programmes supporting the National ‘Veg Power’ campaign, and development of a pupil-led healthy lunchbox toolkit;</li> <li>Supporting the Cardiff Metropolitan University Open Campus Programme and other initiatives.</li> </ul>			<ul style="list-style-type: none"> <li>The Healthy Relationships Directory and resources have been developed and disseminated to schools. Resources on menstruation and sustainable period products are underway; the latter is being done with involvement from the Cardiff Youth Council. Information on Relationships &amp; Sexuality Education/Healthy Relationships for families was also disseminated to support home learning during the summer term.</li> <li>The pupil-led healthy lunchbox toolkit has been piloted and circulated. In addition, information for families on healthy lunchboxes has been distributed, along with cook-along videos commissioned to support families, particularly while school catering has been affected by Covid-19. The Veg Power campaign continues to be promoted.</li> <li>Good partnerships made with Cardiff Met and Sport Cardiff, with support provided to target specific schools for programmes including Open Campus. In 2019-20, 22 targeted schools took part in Open Campus on the Cardiff Met site. Support and promotion of other programmes was also carried out, including Cardiff Games and the School Sport Briefing. Continuing to liaise with team to look at what can be offered and promoted to schools in line with current restrictions.</li> </ul>				
Deliver a Community-Focused Schools Policy that recognises and builds on the role of the school at the heart of the community.	Cllr Sarah Merry	Education & Lifelong Learning	Research to inform the Community-Focused Schools Policy is ongoing to take this forward in 2021.	A	A		
Launch a school workforce strategy to recruit, retain and develop staff at all levels in Cardiff by March 2021.	Cllr Sarah Merry	Education & Lifelong Learning	Work towards developing a school workforce strategy has been delayed due to challenges presented by the Covid-19 pandemic but will be re-visited in the new year.	A	A		

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
			<p>A number of programmes are in place to develop a high-quality education profession, commissioned through the Central South Consortium. This includes:</p> <ul style="list-style-type: none"> <li>• A regional professional learning offer in place for all school to support national and regional priorities.</li> <li>• A refined Teaching Assistant Learning Pathway and Newly Qualified Teacher induction process which facilitates appropriate learning pathways for practitioners.</li> <li>• Professional Learning Pathways to enhance current and future leaders.</li> <li>• Supporting the implementation of national and regional strategies for developing Welsh in schools.</li> </ul>				
<p>Strengthen school governance by enhancing governor training, encouraging shared capacity building between school governing bodies, developing Federation models where these would add value, and extensive promotion and marketing campaigns to attract new governors into Cardiff schools.</p>	<p>Cllr Sarah Merry</p>	<p>Education &amp; Lifelong Learning</p>	<p>Regular guidance has been produced for governing bodies on their role and priorities during the pandemic, highlighting the importance of strong governance. Regular webcasts have also been held for chairs of governors to update them on key development during this time.</p> <p>New delivery models for governor training were piloted during the summer term and will be implemented this academic year. This will include a combination of online and facilitated sessions.</p> <p>Work is underway with the Central South Consortium regarding additional support and improvement actions for governing bodies and a new 'leaders of governance' scheme is being piloted to replace the current consultant governor programme.</p> <p>A new governor recruitment campaign has been launched on social media containing key messages about supporting Cardiff's schools as a governor. A new portal has also been created for interested governors to find out more about the role and to register their interest – <a href="https://www.educardiff.co.uk/">https://www.educardiff.co.uk/</a>.</p>	<p>G</p>	<p>G</p>		

Page 43

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
			Over 100 expressions of interest and 35 completed governor application forms have been received to date. Work is underway to place applicants on governing bodies where their skills and experience can best be used.				
<p>Support young people into education, employment or training by delivering the Cardiff Commitment, with a focus during the academic years 2019-20 and 2020-21 on:</p> <ul style="list-style-type: none"> <li>Creating school/business partnerships to deliver experiences of work and target skills development in the key economic growth sectors of the Cardiff Capital Region;</li> <li>Delivering targeted programmes of engagement and support for our most vulnerable young people;</li> <li>Developing and promoting apprenticeship options for young people aged 16 – 19 with partners;</li> <li>Developing a community benefits framework, via the procurement of Council goods and services, that delivers meaningful opportunities to young people.</li> </ul>	Cllr Sarah Merry	Education & Lifelong Learning, and Economic Development	<p><b>Economic Development Update – Green</b> Additional focus given during Covid-19, including the development of an Economic Task Force.</p> <p><b>Education Update:</b> Transition activity was developed throughout lockdown to support children and young people in making their next move. Regional Skills Partnership joint working is in place and a new pledge for partners has been developed. The experiences of work pilot is in progress in two schools with partnership agreement between Careers Wales, first Campus, Speakers for Schools and the Cardiff Commitment.</p> <p>Vulnerable groups offer established with the Educated Other Than At School team and Youth Justice Service. The offer is expected to progress to include the Looked After Children in Education offer with Children’s Services.</p> <p>Apprenticeships, Kickstart and other alternative pathways are in development alongside post-16 information and communication, brokerage and support as well as provision and opportunities. The Social Value officer role has been approved and plans are underway to progress maximising opportunities through social value for children and young people.</p>	G	G		
Deliver an integrated model of Youth Support Services, built on high-quality youth work, to remove barriers to	Cllr Sarah Merry	Education & Lifelong Learning	The remodelling of the Youth Support Service has resulted in an increase in access – extra nights and extra reach via digital networks and street-based activity. During August there were over	A	A		

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
engagement and participation by April 2021.			<p>250,000 social media hits, nearly 1,500 socially distanced in-person connections and over 580 young people were supported by mentors. The impact of youth centre closures due to the lockdown has been counteracted by increased outreach and street-based youth work both by the service and the youth group partners. The service has contributed to the improved outcomes for Educated Other Than At School learners by providing a range of non-formal education programmes and supporting young people in formal education to maintain engagement and successfully transition. The service has been part of a new multi-agency panel, along with children's services and the Youth Justice Service, during lockdown, to provide support for young people who are subject to exploitation, mental health issues and homelessness.</p> <p>However, governance of Youth Services has not been taken forward due to the redeployment of staff to Covid-19 activity.</p>				
Enable all young people with additional learning needs – who are known to social services – to play an active and central role in planning for their transition to adulthood during the year.	Cllr Graham Hinchey	Social Services	Evaluation of current practice within the newly established transition teams across Children's and Adult Services has commenced. Although work has been delayed by Covid-19, transition workers have continued to make contact with families to ensure that immediate needs are met. Agreement reached at Children and Young People's Strategic Partnership and Disability Futures Programme Board that transition protocol will focus on children with disabilities first and then be widened to cover other issues, such as mental health.	A	A		
Improve mental health and emotional well-being for young people by working in partnership to deliver an integrated approach to children and young people's emotional and mental health support across the child's journey by March 2023 by:	Cllr Sarah Merry & Cllr Graham Hinchey	Education & Lifelong Learning, People & Communities, and Social Services	<p><b>P&amp;C Update – Green</b></p> <p>Three (2.0 FTE) Primary Mental Health Specialists (PMHS) started in post on 14<sup>th</sup> September 2020. The PMHS have been working through an induction programme with colleagues across the Early Help Teams. They are now at the point where they will either manage cases directly that have come through the Family Gateway, refer onto specialist health services or provide specific</p>		G		

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
<p>Page 434</p> <ul style="list-style-type: none"> <li>• Reviewing the effectiveness of the integrated referrals for the Barnardo's Family Wellbeing Service through the Family Gateway;</li> <li>• Developing an approach to joint assessment across Early Help teams and commissioned services to ensure family needs are met by June 2020;</li> <li>• Working with the Cardiff and Vale University Health Board (UHB) to recruit two Young People's Emotional Health and Wellbeing specialists to work alongside the Family Help, Support4Families and Cardiff Parenting teams by June 2020;</li> <li>• Working with the Cardiff and Vale UHB to develop trusted referrer pathways from Early Help teams into the proposed NHS Single Point of Access Emotional and Mental Health Hub by January 2021;</li> <li>• Piloting the role of resilience workers with the Cardiff and Vale UHB to build capacity for schools to address the numbers of children affected by multiple adverse childhood experiences;</li> <li>• Delivering emotional and mental health support for young people through youth work intervention and the Curriculum for Life programme by April 2021.</li> </ul>			<p>primary mental health advice to the Family Help or Parenting teams to support them in managing their cases.</p> <p>Work has also been undertaken with the manager of the Resilience workers team, based within Education and local schools. This is to ensure clarity of purpose; agree referral pathways and agree how teams will work together where there is cross-over and where appropriate.</p> <p>A review has been completed of the effectiveness of the referral pathway for the Barnardos Well-being service, through the Family Gateway. This is working well with only 2 out of the 223 referrals made so far this year through the Gateway, being deemed as inappropriate.</p> <p>Meetings with lead officers are held routinely and discussions are in place to look at where there might be any cross-overs with this service and the work of the PMHS.</p>				

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
<p>Continue to reduce the impact of adverse childhood experiences on children’s wellbeing by:</p> <ul style="list-style-type: none"> <li>Developing new ways to review and monitor progress and impact of the Family Gateway, Family Help and Family Support teams by March 2021;</li> <li>Further developing the Family Gateway, Family Help and 0-16 Parenting Services by incorporating the Disability Team around the Family and Disability Parenting into these services, with the aim of providing a more inclusive approach to supporting families by March 2021.</li> </ul>	<p>Cllr Graham Hinchey &amp; Cllr Sarah Merry</p>	<p>People &amp; Communities, and Social Services</p>	<p><b>P&amp;C Update – Green</b></p> <p>In April a team of six staff, previously the Disability Team Around the Family (DTAF) under the management of Action for Children, TUPE’d into the service to form the Family Help Disability team.</p> <p>Following the successful completion of a virtual induction programme, the team began taking referrals in mid-May. As with the generic Family Help team, short-term intervention is provided but the primary need for the family is in relation to the young person’s disability. A formal diagnosis is not required; however the young person needs to be under paediatric or consultant review.</p> <p>Referral processes and step-up/ step-down procedures have been developed with key partners to ensure that families referred into the service are receiving the most appropriate level of support according to the identified needs.</p> <p>A consultation process has also been established for staff within the wider Early Help teams who can seek advice from the team in relation to specialist support for identified disabilities.</p> <p>Two DTAF employees successfully TUPE’d into the Cardiff Parenting Service, as one had previously delivered Family Links Parent Nurturing Programme for parents of children with Additional Needs and another was previously the lead trainer for Cygnet, a group for parents of children with a diagnosis of the autism spectrum conditions.</p> <p>A review of the provision of services available to parents of children with additional needs and disabilities in Cardiff is being undertaken by the Parenting Service manager. This is being undertaken in collaboration with the OM for Adults and Children’s Learning</p>	<p>G</p>	<p>G</p>		

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
			<p>Disabilities and with colleagues from the neurodevelopmental teams within the University Health Board. The aim being to further develop Cardiff Parenting Services to ensure that all elements of the services are inclusive and supportive of children with additional needs, and their parents; and ensure that the Cardiff Parenting Services workforce have the specific skills and abilities to meet the increasingly complex needs of children and families.</p> <p>A Cardiff Parenting Additional Needs Implementation Plan has been developed to progress this work.</p> <p><b>Social Services Update – Green</b></p> <p>Arrangements are working well. Step-up/ step-down processes are in place and Early Help, Support4Families and Muti-Agency Safeguarding Hub (MASH) managers meet regularly. The Family Gateway and Family Help audit framework has been reviewed and changes made following a pilot. The revised audit plan and process is in place and audits are being undertaken routinely. Support4Families cases are to be audited via work with the Institute of Public Care. Disability Team Around the Family (DTAF) have transferred over and all referrals are now routed through the Family Gateway. There has been a short delay in commissioning programmes tailored for families with children with a disability. Work is being undertaken with colleagues in Child Health &amp; Disability, the University Health Board and Education to understand the potential demand and worries and concerns of families, so that the right programme(s) can be commissioned.</p>				
Enable more children to be placed nearer to home by December 2022 by:	Cllr Graham Hinchey	Social Services		A	A		

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
<ul style="list-style-type: none"> <li>• Implementing the action plans arising from the Social Care Commissioning Strategy by December 2022, including:               <ul style="list-style-type: none"> <li>- Supporting children to return safely to their own homes during the year using a Reunification Framework;</li> </ul> </li>   <li>- Re-shaping respite provision by March 2021 to offer flexible short-break opportunities including emergency provision for children with disabilities;</li> </ul>			<p>A briefing session for the Children’s Management Team was held with the NSPCC in advance of roll out to the wider staff group. Workshops have been held with managers to determine the readiness of the service for implementation and inform the workstreams that need to be delivered. 10 staff have received train the trainer training. We need to consider how this approach will dovetail with other initiatives in Cardiff, such as Signs of Safety. The timescale has been condensed due to the delay in initiating the project due to Covid-19, leaving 7 months to implement. Discussion with the NSPCC is required as to whether they can extend the timescale. It has been agreed that the NSPCC risk toolkit will be used and we now need to identify the children/ young people who will be included in the pilot. Project support needs to be identified.</p> <p>The need to expand existing service provision has been agreed, with a recognition that the current building cannot meet all needs required by the young people who require services. Work has been undertaken to set out a vision for the service - officers have worked collaboratively with Housing colleagues to explore options for delivery of overnight respite services within the Ty Storrie building. A Project Group has been set up to look at opportunities to remodel the provision at Ty Storrie and work will be undertaken to consider opportunities for developing a separate resource for emergency provision as it has been agreed that Ty Storrie should focus on delivering planned overnight respite going forward. A needs analysis will be undertaken as part of the disabled children’s commissioning strategy that will inform the strategic direction for respite provision in the future. This will feed into a business case</p>				

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
<p>- Re-designing our Local Authority Fostering Service by December 2020 to increase our numbers of Cardiff foster carers' homes for children;</p> <p>- Launching a new residential assessment centre by March 2021;</p>			<p>setting out the proposal for how the building should be used to meet the needs of disabled children and young people. It is proposed that the timescale for this work be extended to September 2021.</p> <p>A gap analysis has been completed along with a deep dive to inform our understanding of the wider needs of the service. A proposed structure has been developed and shared with trade unions and consultation has been undertaken with the staff group. The fostering service front door has moved to the Into Work Service to strengthen the presentation of fostering as a vocation and a media campaign has been launched to show how easy it is for agency foster carers to transfer to Cardiff's in-house service. A system is in place for the Operational Manager to oversee all applications for in house placements where a match is not initially made. The number of children in in house placements has risen to 110 at 28th September 2020 compared with 93 at 30th September 2019. Work is being undertaken to develop placements for parents and babies and a placement of this type was made in Quarter 2.</p> <p>A property has been identified and the purchase is in progress. A potential issue has been identified with regard to a covenant on the property restricting use to a residential dwelling. Legal advice has been sought and planning permission requested to approve the home for use as is or to change the covenant if appropriate. Recruitment for the manager and the rest of the team is ongoing. The statement of purpose and policies and procedures have been drafted and are currently being finalised.</p> <p>A system has been developed to monitor and project demand for Gateway provision and work is being undertaken with Housing to</p>				

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
<ul style="list-style-type: none"> <li>- Developing accommodation sufficiency for vulnerable young people and those leaving care by December 2022;</li> <li>• Developing an effective recruitment plan with the Regional Adoption Service to increase the number of adoptive placements by March 2021.</li> </ul>			<p>develop a 'spend to save' business case to increase the level of provision currently available. Further guidance is required for staff in order to understand the process and the need to plan referrals in advance. During the quarter the Young Person's Gateway waiting list reached 53 – this has now reduced to 32.</p> <p>We are currently reviewing children with a Placement Order to identify where plans have changed and the Placement Orders need to be revoked. A tracker will be developed to monitor children on Placement Orders who are not yet placed for adoption going forward.</p>				
<p>Continue to develop and support the Children's Services workforce by implementing a recruitment and retention strategy and refreshed workforce plan by March 2022, including:</p> <ul style="list-style-type: none"> <li>• Introducing a market supplement by April 2020;</li> <li>• Increasing tailored recruitment campaigns linked to this new offer;</li> </ul>	<p>Cllr Graham Hinchey</p>	<p>Social Services</p>	<p>Introduction of a market supplement has been successfully implemented.</p> <p>Work on recruitment continued throughout the lockdown period and results are beginning to show. An OM lead for recruitment and retention has been allocated. A recruitment campaign with Golley Slater went live on 15th May and ran to the end of September. A dedicated Website – SocialWorkCardiff – has directed traffic to recruitment. This site has seen visitors to the website increase substantially. Social worker vacancies were at 29.2% (57.5 / 196.7) in September 2020 compared with 38.7% in June 2020. Based on new starters due to come into post, we are projecting that vacancy levels will continue to decrease in Quarter 3.</p>	<p>A</p>	<p>A</p>		

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
<ul style="list-style-type: none"> <li>Implementing longer-term proposals to retain social workers in Cardiff through ensuring competitive rates of pay and that social workers are fully supported by April 2021.</li> </ul>			<p>Induction processes are being reviewed and strengthened and every newly qualified social worker now has a mentor. A deep dive exercise has been undertaken to better understand capacity in the teams and inform a skills mix proposal going forward. A phased exit plan has been agreed for the Managed Team although some staff have left ahead of time due to securing contracts elsewhere. A Care and Support Plan team resource has been secured for 10 workers until 31st March 2020. Difficulties in recruiting to Grade 8 posts continue and Children’s Management Team are considering options to address this.</p>				
<p>Page 440</p> <p>Map out the locality working model for Children’s Services and review the impact to better support families.</p>	Cllr Graham Hinchey	Social Services	<p>Work has commenced to map demand against the localities and determine how many cases are not yet sitting in the correct locality team. Volunteers from across the service have been identified to be part of a practice development group that has been established with various workstreams to engage staff and take forward best practice in key areas across the service. Engagement in these workstreams is really positive and progressing well. A caseload weighting system is under development. Work in relation to mapping out the impact of poverty in localities and to identify community resources has been delayed by Covid-19, but will restart shortly now that the responsible OM is back in their substantive post, having been repurposed during Covid-19.</p>	A	A		
<p>Implement the renewed Corporate Parenting Strategy action plan by March 2023 to improve outcomes and well-being for Children Looked After by:</p>	Cllr Graham Hinchey & Cllr Chris Weaver	Social Services, Education & Lifelong Learning and People & Communities	<p><b>P&amp;C Update – Green</b></p> <p>Data has been collected monthly from various council databases to have a clear vision of those aged 16-24 who are care experienced and not in education, employment or training (NEET), so there is a baseline figure to work from. Youth mentors are working on the lists created, targeting interventions and support accordingly. It is too early to say at this time if base line numbers will reduce – especially as the impact of Covid-19 on the economy and job</p>	A	A		

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
<p>Page 441</p> <ul style="list-style-type: none"> <li>Developing partnership arrangements around access to education and educational attainment for Children Looked After;</li> <li>Improving transition and progression into education, employment or training for care leavers by March 2021.</li> </ul>			<p>availability will start to be realised. There is, however a much better overview of numbers across the city with data guiding who is supported rather than a scatter dash or first come first served basis approach.</p> <p><b>Social Services Update – Amber</b></p> <p>Consultation sessions with young people commenced prior to Covid-19 and further sessions held virtually. 22 young people engaged in total aged 5-27 and in a range of care settings, including children with disabilities. Kinship carers and foster carers have also been engaged. The renewed Corporate Parenting Strategy is being drafted and informed by benchmarking good practice with Bristol, Powys and Carmarthenshire. It will be supported by an agreed set of performance indicators. A Corporate Parenting Officer has been appointed to take this work forward and took up post at the end of Quarter 2. Arrangements are being made for the Strategy to be agreed at full Council in January 2021.</p> <p>OM lead has been identified to take this work forward as we move into restart / recovery phase. Social workers and carers have been engaged with the Personal Education Plan (PEP) process, and PEP returns have increased significantly. Young people have been supported with electronic devices. Vulnerable Learners Meetings are working really well – enabling information sharing about particularly vulnerable children who are looked after (and some who are on the Child Protection Register. Discussions take place identifying needs and how they can be met and by who. Joint meetings with senior managers from Children’s Services and Education have not taken place during the Covid-19 period but will restart in Quarter 3.</p>				

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
			<p>The Into Work Service work closely with the Personal Adviser Service to identify young people for referral. From April to September 2020 Bright Futures received 101 new engagements, of which 16 entered employment, 17 entered education, 40 started training and 18 started a Bright Start work placement. A bid has been submitted to the Department for Work and Pensions for a grant to embed a 'stepping stones' programme of relationship-based activities in order to support young care leavers who aren't eligible for referral to into Work Service into education, training or employment. The Youth Justice Service have established a link with Cardiff Commitment and developed a pilot entrepreneurship programme – to be rolled out in December 2020. Work has begun to explore how Corporate Apprenticeships can be supported within the service. The economic impact of Covid-19 on employment opportunities for vulnerable young people is a concern.</p>				
Implement a new service to support young carers by March 2021.	Cllr Graham Hinchey	Social Services	<p>A brand identity has been agreed and systems set up to enable data capture in relation to young carers at the front door. Innovative approaches to working with young carers were developed during the Covid-19 period, although the planned launch of the service / building has been delayed due to arrangements for staff to work from home. The Young Carer Service have since started undertaking some face to face work in line with Covid-19 guidelines. Investigations are being made into whether it would be beneficial for young carers to have an id card. Initial feedback from young carers was that they don't want one, however more recent communication suggests that they would be interested. A decision about whether to proceed will be made early in Quarter 3. A specialist post to work with young carers has been advertised on a permanent basis – interviews will be held early in Quarter 3. Awareness raising is being undertaken with schools; the next step is to engage with GP clusters to ensure that</p>	A	G		

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
			young carers are included in medical appointments for the people that they care for.				

## Well-being Objective 2

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
<p>Fully implement enabling support and care using a new model of intermediate tier care and support by March 2021 to include a:</p> <ul style="list-style-type: none"> <li>• New model of Community Resource Teams;</li> <li>• Single point of access;</li> <li>• New model of residential reablement.</li> </ul>	Cllr Susan Elsmore	Social Services	<p>A new locality model will be introduced for the Community Resource Teams and a new 'Cluster manager' role has been developed which will oversee all of the localities. The role will be advertised following approval by the Job Evaluation Panel.</p> <p>The Single Point of Access (SPA) will be strengthened with introduction of a senior social worker and a contact officer.</p> <p>The residential reablement is currently out to tender with a closing date of the end of October.</p> <p>The evaluation of services will now be undertaken in Quarter 4.</p>	A	A		
<p>Commence the phased implementation of the new way of delivering domiciliary care by November 2020 that fully reflects local and community provision and the priorities of the Older Persons Housing Strategy.</p>	Cllr Lynda Thorne & Cllr Susan Elsmore	Social Services	<p>This was originally delayed due to Covid-19 (original contract start date was 1<sup>st</sup> December). 'Test and Learn' sessions have continued throughout the Covid-19 period virtually and the contract has been extended up to 1<sup>st</sup> April 2021. Currently we expect to meet this timeframe.</p>	R	A		
<p>Deliver the Older Persons Housing Strategy to support independent living, fully understanding older people's housing needs and aligning work between Council and Health Services including:</p> <ul style="list-style-type: none"> <li>• Working to build and refurbish 'care-ready' schemes for older people;</li> <li>• Continuing the development of person-centred information, advice and assistance for older people and those with disabilities, including the development of performance measures for the service;</li> </ul>	Cllr Lynda Thorne & Cllr Susan Elsmore	People & Communities, and Social Services	<p><b>P&amp;C Update – Amber</b></p> <p>Consultation with residents at Worcester Court has been completed to finalise plans and obtain planning permission for extension. The planning application has been submitted and is now awaiting approval. The programmed work at Worcester Court was due to start in June but there has been a delay due to Covid-19.</p> <p>All plans for Broadlands Court have been finalised with the residents and this scheme was due to start once Brentwood was completed. However, the internal works have been delayed due to Covid-19.</p>		A		

<ul style="list-style-type: none"> <li>Developing innovative models of care, support and nursing services.</li> </ul>			<p>Planning consent has been achieved for the Maelfa Independent living scheme. We have also achieved planning consent for the St. Mellons independent living scheme. Both schemes are now out for tender for contractors. We are anticipating a start on site for both schemes early in 2021.</p>				
<p>Continue the work on complex hospital discharge with partners through an integrated multi-agency approach to reduce the number of people experiencing failed or delayed discharge.</p>	<p>Cllr Susan Elsmore</p>	<p>Social Services</p>	<p>Work has been undertaken to strengthen the Multi-disciplinary Team (MDT) within the Single Point of Access to reduce delayed discharge and this continues to be supported by the First Point of Contact Hospital team (the 'Pink Army') and wider MDT in the hospital. This work continues to feed into the enablement team to support people moving back home.</p> <p>An 'Asset Based Approach' will be used to improve this work further. This is a model of support and care which considers what a person is able to do and achieve, as well as looking at community resources such as third sector organisations, for people to be able to live the life they choose. Unfortunately due to Covid-19 there has been a delay in rolling out Asset Based Approaches to all frontline staff. However the new deadline for this will be March 2021.</p>	<p>A</p>	<p>R</p>		
<p>Address social isolation and enhance quality of life of older people by:</p> <ul style="list-style-type: none"> <li>Helping to build links between citizens, groups, organisations and private businesses;</li> <li>Bringing young and older people together to provide a platform where skills, experience and understanding can be shared.</li> </ul>	<p>Cllr Susan Elsmore, Cllr Lynda Thorne &amp; Cllr Sarah Merry</p>	<p>People &amp; Communities, Education &amp; Lifelong Learning, and Social Services</p>	<p><b>P&amp;C Update – Red</b></p> <p>Due to Covid-19, we have not been able to act on this action, we have moved to virtual platforms during this period, and have an engagement plan for when groups can re-start and or be created, once restrictions are lifted.</p>	<p>G</p>	<p>R</p>		
<p>As a Dementia Friendly City, support those affected to contribute to, and participate in, the life of their communities by:</p> <ul style="list-style-type: none"> <li>Undertaking Dementia Friends training across the Authority with the aim of</li> </ul>	<p>Cllr Susan Elsmore &amp; Cllr Sarah Merry</p>	<p>Social Services, and Education &amp; Lifelong Learning</p>	<p>Currently 40% of Council staff have undertaken the Dementia Friends training. This is now a focus to ensure that this improves</p>	<p>A</p>	<p>A</p>		

<p>100% compliance amongst Council staff by April 2021;</p> <ul style="list-style-type: none"> <li>Developing a school engagement programme to encourage more inter-generational activities and events;</li> <li>Encouraging businesses to become Dementia Friendly by delivering the Council's awareness and engagement programme;</li> <li>Developing a dementia-focused website by April 2020 to support those with dementia, carers, families as well as businesses who want to better support those with dementia;</li> <li>Delivering locality-focused dementia awareness events.</li> </ul>			<p>throughout Quarter 3. However the compliance target is being reviewed due to a number of staff across the Council remaining on furlough.</p> <p>School engagement programmes are currently on hold due to Covid-19 and the risk around introducing external staff into school settings. This remains under review. Alzheimer's Society staff are still on furlough, meaning this has not yet moved forward. The Council is awaiting further information regarding when it may be possible to re-engage these events.</p> <p>This has been delayed due to Covid-19. Figures for Quarter 1 show engagement with 12 businesses, and work has continued throughout Quarter 2. This remains on the agenda for the remainder of the year, though the final result is expecting to be lower than initially hoped.</p> <p>The new Dementia Friendly Cardiff website launched at the end of Quarter 2. Dementia Friendly Cardiff is a partnership between Cardiff Council, Alzheimer's Society Cymru and Cardiff &amp; Vale University Health Board, which over recent years has been working towards making Cardiff a more dementia-friendly community. The Dementia Friendly Cardiff website will be a 'one-stop shop' of valuable information about services and support in the city to assist people living with dementia to live well in the capital.</p> <p>151 events have been held throughout the city this year, though these have not been based in schools. Digital options are being considered for this due to not being able to produce classroom-based practical training.</p>				
--	--	--	--	--	--	--	--

### Well-being Objective 3

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
Encourage and support organisations to become accredited Living Wage employers.	Cllr Chris Weaver	Resources	Positive discussions are ongoing with Public Services Board members who are not accredited Living Wage employers. Cardiff & Vale UHB became accredited in Quarter 2, helping Cardiff achieve 2 of its 3 key 2022 Living Wage City objectives in terms of number of employees working for an accredited Living Wage employer and number of employees who have had a pay rise to at least the real Living Wage. There are now 117 accredited Living Wage employers in Cardiff, 48,691 people working for an accredited Living Wage Employer and 7,131 workers have received a pay rise as a result of employers becoming Living Wage accredited.	G	G		
<p>Support people into work by:</p> <ul style="list-style-type: none"> <li>• Creating 125 paid apprenticeships and trainee opportunities within the Council by March 2021;</li> <li>• Placing over 3,000 people into Council posts through Cardiff Works;</li> <li>• Supporting 850 people into work with tailored support by the employment gateway.</li> </ul>	Cllr Chris Weaver	Resources, and People & Communities	<p><b>Resources Update – Green</b></p> <p>The number of paid apprentice and trainee opportunities across the Council was 98 at the end of quarter 1 and 104 at the end of quarter 2. Information is available for Directorates on how to go about creating Directorate funded apprentice and trainee posts. Close contact has been kept with Directorates during the pandemic to ensure that apprentices and trainees are being utilised effectively and that their learning is continuing. Bid process was disseminated across the Council for this year’s funding. Bids were received at the beginning of September and are being reviewed along with the finances required to extend any current placements due to restrictions in the work being carried out and therefore any learning and development during the pandemic. Work experience is being reviewed and alternative mechanisms put in place to ensure that these placements can continue albeit on a different and likely virtual basis.</p> <p><b>P&amp;C Update – Amber</b></p> <p>A full service review of Cardiff Works has now been completed and was agreed by Cabinet in September. A new improved and enhanced</p>		A		

<p>Further improve the Into Work Service by continuing to integrate employment support services. This will include:</p> <ul style="list-style-type: none"> <li>• Reviewing support for care-experienced young people to ensure it is meeting their needs;</li> <li>• Fully aligning the 'Learning for Work' programme offered through Adult Community Learning with the Into Work Service;</li> <li>• Providing effective employer engagement and assistance into self-employment;</li> <li>• Continuing to promote and extend volunteering opportunities.</li> </ul>	<p>Cllr Chris Weaver</p>	<p>People &amp; Communities</p>	<p>Cardiff Works service will now be rolled out. This includes digitalisation of the service and closer working with Into Work Services as well as (when allowed due to Covid-19) a full time face to face presence at Central Library Hub .</p> <p>A small publicity campaign has commenced and the new attractive website has been launched. There has been a huge influx of requests for the track and trace system.</p> <p>Due to no face to face service (except emergencies) and few jobs being created and the introduction of the Furlough scheme, there has been few people currently that have been supported into work at the time. However, unless there is another national lockdown, we are confident that we can meet the target by the end of the year.</p>				
<p>Further improve the Into Work Service by continuing to integrate employment support services. This will include:</p> <ul style="list-style-type: none"> <li>• Reviewing support for care-experienced young people to ensure it is meeting their needs;</li> <li>• Fully aligning the 'Learning for Work' programme offered through Adult Community Learning with the Into Work Service;</li> <li>• Providing effective employer engagement and assistance into self-employment;</li> <li>• Continuing to promote and extend volunteering opportunities.</li> </ul>	<p>Cllr Chris Weaver</p>	<p>People &amp; Communities</p>	<p>A full launch of Bright Futures was carried out at the beginning of 2020. This has led to closer working with the youth mentors and the Social Services Personal Advisers who support care leavers. This has led to some excellent outcomes for these young people even during lockdown.</p> <p>Adult Learning (for work) is now part of the Into Work team, so is fully aligned. This will ensure that referrals and outcomes between the services are seamless for those looking for work or to improve their digital skills.</p>		<p>G</p>		
<p>Continue to ensure support is available to mitigate potentially negative consequences associated with the roll-out of Universal Credit by:</p>	<p>Cllr Lynda Thorne</p>	<p>People &amp; Communities</p>	<p>Ongoing briefing sessions are carried out for staff on Universal Credit. The Advice line are also fully trained on Universal Credit.</p>		<p>G</p>		

PAGE 18

<ul style="list-style-type: none"> <li>Ensuring all Hub staff are able to support with claims for Universal Credit;</li> <li>Implementing measures to help private landlords with the changes associated with Universal Credit;</li> <li>Working with Jobcentre Plus, Registered Social Landlords and other partners to ensure that vulnerable individuals get the budgeting support they need.</li> </ul>							
<p>Deliver a new skills hub in the city by May 2020 to provide on-site construction skills, apprenticeships and employment within the sector.</p>	Cllr Lynda Thorne	People & Communities	Currently, due to Covid-19 and funding issues with the Construction Industry Training Board, this has yet to be launched. More details will be known about the scheme going forward in mid-November 2020.		R		
<p>Continue to deliver the Rough Sleeper Strategy and the Homelessness Strategy including:</p> <ul style="list-style-type: none"> <li>Taking forward the Strategic Review of services for single homeless;</li> <li>Reviewing and improving emergency accommodation, continuing to ensure no one has to sleep out in Cardiff;</li> <li>Extending the capacity of the Housing First schemes using both social and private rented sector homes and developing plans to make the scheme sustainable;</li> <li>Continuing to develop the multi-agency team around rough sleepers, improving support available for those with substance misuse, and for those with co-occurring mental health and substance misuse issues. Also</li> </ul>	Cllr Lynda Thorne	People & Communities	<p><b>Secure additional funding from Welsh Government in order to manage the transition to our proposed new way of working in single person homelessness.</b> - Due to the onset of the Covid-19 pandemic priorities with regards to homelessness have changed. £10 million was made available to Local Authorities to assist in the response to the pandemic. A further £20 million was made available to transform homelessness services and ensure no one need return to rough sleeping.</p> <p>182 units of supported accommodation were established made up of 20 isolation units, two hotels, and re-purposed accommodation. Between 23<sup>rd</sup> March and 12<sup>th</sup> April 2020, 140 clients were provided with appropriate accommodation.</p> <p>Rough sleeping reduced from approximately 30 people in March 2020 to 5 in April 2020.</p> <p>Funding has been made available for this year and an application has been submitted to cover costs, however continued funding will be</p>		G		

<p>strengthening links with the criminal justice system through enhanced probation input into the team;</p> <ul style="list-style-type: none"> <li>• Building on Give Differently to further investigate opportunities to address daytime begging within the city centre.</li> </ul>			<p>required if services are to remain in place and if the progress made to date in addressing homelessness is to be maintained.</p> <p><b>Identify sites for additional accommodation suitable for people with complex needs.</b> - The creation of the pilot Cardiff Assessment Centre will better understand the needs of people presenting with complex needs.</p> <p>We have opened Countisbury House, a 16-bed unit for people with low/medium support needs.</p> <p><b>Explore the feasibility of upgrading and remodelling existing accommodation within the SPG.</b> - In order to close the hotels commandeered throughout the pandemic and move clients into appropriate accommodation, 42 self-contained units for those with medium support needs opened at Ty Casnewydd in September 2020.</p> <p>47 self-contained units at Baileys Court offering more stable accommodation/housing first in a supported setting are planned. Work will commence in November 2020.</p> <p>Adams Court which is currently a family hostel will be converted into a specialist supported accommodation for single clients with complex needs.</p> <p><b>Finalise the emergency accommodation standards in partnership with accommodation providers.</b> - Due to the pandemic, the use of emergency accommodation has changed. All accommodation must now be self-contained with shared sleeping places heavily reduced in order to comply with Covid-19 restrictions. With the introduction of the accommodation units at the new Assessment centre, we aim to only use Pods as emergency accommodation with a longer term plan to phase out the use of Pods.</p>				
--	--	--	---	--	--	--	--

		<p><b>Extend Housing First by an additional 20 units.</b> - Housing First has been expanded from 40 to 55 units. The current SAIL Team will also be increased and work with complex high need clients using critical time intervention approaches. They will provide more intensive support to clients that are in supported accommodation and ready to transition into independent living.</p> <p><b>Embed and develop closer working arrangements with the criminal justice service through appointment of the part-time probation officer based at the Multi-Disciplinary Team and a worker based in HMP Cardiff.</b> - A Probation Officer has now been recruited and is working within the MDT. We have also re-filled the Street Safe Officer role with SWP. The Housing First project has developed a pathway for prisoners on release, direct into the scheme.</p> <p><b>Commence review of MDT in order to finalise the long-term structure of the Team.</b> - The current team has expanded this year with an additional 3 therapeutic workers to be recruited, bringing the total to 6 in the team. Funding has also been secured for a psychologist and occupational therapist. A training post has also been secured to look at workforce development across Housing, Health and Support Services.</p> <p><b>Pilot the Cardiff Assessment Centre.</b> - This has been delayed slightly due to the pandemic. The building of 19 self-contained emergency accommodation units at the Assessment Centre has commenced. We are looking to open this new Centre in December 2020.</p> <p><b>Improve the prison pathway for those at risk of rough sleeping, in partnership with the probation officer based in the MDT.</b> - We are committed to improving the prisoner pathway. The pandemic provided an opportunity for improved joint-working with prisons, particularly surrounding referrals for early release prisoners. We will</p>				
--	--	---	--	--	--	--

			take this learning forward. The Housing First Prisoner pathway has also been developed so individuals can access the scheme direct from prison. We have recruited a Probation Officer within the MDT who will work closely with the Street Safe Officer from South Wales Police.			
Develop a training and activities centre for single homeless people to divert them from street culture by providing a range of meaningful activities and commence the service by September 2020.	Cllr Lynda Thorne	People & Communities	<p>The plan to open additional accommodation for Cold Weather was impacted by the Covid-19 Pandemic. In order to support Frontline services in getting everyone off the street into a placement, we opened the Parade in April 2020. This project has since been closed in July 2020 and remains ready to use if required.</p> <p>The Covid-19 pandemic has had an impact on the Diversionary Activities Scheme, resulting in this project temporarily closing, with staff being re-assigned across the Frontline to support with providing additional accommodation.</p> <p>As the Pandemic has progressed, we have been able to introduce a minimised timetable for activities in parts of our frontline provision working closely with partner groups. The Diversionary Activities Team has now been put back into place and are working on re-establishing existing activities and increasing the options available to people going forward.</p>		G	

## Well-being Objective 4

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
Deliver 2,000 new Council homes, of which at least 1,000 will be delivered by May 2022.	Cllr Lynda Thorne	People & Communities	<p>The procurement plan has been written and approved, this covers the entire new build programme. As above, the tender process for both St. Mellons and Maelfa Independent Living Scheme has begun with the Pre Qualification Questionnaire (PQQ) stage completed.</p> <p>The Planning Application for the Channel View scheme will be submitted in December 2020. The wider public consultation is being launched on 30<sup>th</sup> October 2020.</p> <p>We have delivered 65 new homes to date and we are indicating a total of 233 new homes being delivered by year end taking us to over 500 in total at that point.</p>		G		
Work to end the city's housing crisis by driving up the standards in the private rented sector and in the city's high-rise buildings by taking enforcement action against rogue agents and landlords letting and managing properties.	Cllr Lynda Thorne	Resources, and Planning, Transport & Environment	<p><b>Resources Update - Green</b></p> <p>Amendments to the Rent Smart Wales Memorandum Of Understanding (MOU) have been completed following consultation with Local Authority (LA) partners and Welsh Government. Revised MOU has been signed off by Corporate Director and call-in expired. Documents are now being processed by Legal Services and each Local Authority. Similarly a new Fee Policy is approved and published.</p>	G	G		
Deliver Shared Regulatory Services' business plan.	Cllr Lynda Thorne & Cllr Michael Michael	Planning, Transport & Environment	<p>While elements of the Shared Regulatory Services (SRS) Business Plan 2020-21 have been delivered as far as possible, the Covid-19 outbreak has required the service to re-direct resources to monitor and enforce the Health Protection (Coronavirus Restrictions) (Wales) Regulations 2020, and continue its commitment to the Test, Trace, Protect partnership.</p> <p>SRS was at the forefront of the initial business closure work during Quarter 1, and has been playing a crucial role in supporting businesses as they prepared to re-open to the public during</p>		A		

			<p>Quarter 2. The focus has changed to one where businesses are being challenged as to the continued adequacy of the measures they have in place as well as their ability to control the behaviours of customers through the issue of Improvement Notices and Closure Orders.</p> <p>In addition, the service investigates/resolves complaints and service requests surrounding the coronavirus pandemic from consumers and traders requesting advice about Covid-19 related matters including non-compliance with social distancing; premises trading in breach of the regulations and refunds for holidays that were cancelled as a result of the pandemic.</p> <p>Further work has included market surveillance of hand sanitisers and face masks that have been supplied as PPE which resulted in several brands of hand sanitiser being identified as ineffective against viruses including Covid-19.</p> <p>In terms of Test, Trace, Protect, the service remains a key partner, with a number of SRS officers seconded to TTP in Professional Lead and Contact Tracer roles. Our Communicable Disease Team have continued to provide support to care homes and deal with escalated referrals. The service is currently recruiting staff and contractors to backfill some of the vacant posts within the service created as a result of TTP, to attempt to recover our “business as usual” position.</p>				
<p>Invest in the regeneration of local communities by:</p> <ul style="list-style-type: none"> <li>• Completing Phase 2 of the Maelfa redevelopment scheme by September 2021;</li> <li>• Implementing improvement schemes for existing housing estates across the city based on the priorities identified in</li> </ul>	<p>Cllr Lynda Thorne</p>	<p>People &amp; Communities</p>	<p>Estate regeneration scheme at Lower Llanrumney on site and progressing well. Consultation and design work for Roundwood behind programme due to resident take up and design complexities.</p> <p>Two Neighbourhood Renewal Scheme projects completed – Environmental improvements to Cathays Road End Closures and public realm improvements in Riverside.</p>		<p>A</p>		

<p>the current Estate Regeneration Programme and designing a new programme to co-ordinate with wider new housing initiatives in and around existing communities;</p> <ul style="list-style-type: none"> <li>• Securing Welsh Government Targeted Regeneration Investment Programme funding to deliver regeneration initiatives in the South Riverside Business Corridor;</li> <li>• Submitting an outline planning application for the Channel View Regeneration Scheme by October 2020;</li> <li>• Delivering projects identified in the three-year programme for Neighbourhood Renewal Schemes based on ideas submitted by Ward Members.</li> </ul>			<p>Scoping and consultation completed for 3 Year 2 schemes, Llanishen Street, Llanishen Park and Cowbridge East</p> <p>NRS 3G pitch project behind programme due to Sustainable Drainage System (SuDS) requirements.</p> <p>Design work has commenced for Trowbridge Green and Pennsylvania estate regeneration schemes.</p> <p>The Planning Application for the Channel View scheme will be submitted in December 2020. The wider public consultation is being launched on 30<sup>th</sup> October 2020.</p>				
<p>Continue to deliver the Community Hubs programme, in collaboration with partners, including:</p> <ul style="list-style-type: none"> <li>• Progressing plans for Youth Hubs in the city centre and Butetown;</li> <li>• Working with the University Health Board on the Cardiff Royal Infirmary, Maelfa Hub and other Hubs within the North District;</li> <li>• Ensuring people are connected with local service providers and activities in their neighbourhood through Community Inclusion Officers.</li> </ul>	<p>Cllr Lynda Thorne</p>	<p>People &amp; Communities</p>	<p>Works completed at the Butetown Creative Hub which is now open under current Covid-19 guidelines.</p> <p>Funding sources and building options for a Youth Hub in the city centre are ongoing.</p> <p>Refurbishment work complete and buildings handed over for Whitchurch and Rhydypennau wellbeing hubs.</p> <p>Partnership working with health and the 3<sup>rd</sup> sector on the operational elements of the CRI chapel project are being finalised. Interior design and layout agreed and work on programme on site.</p>		<p>G</p>		

			Maelfa Health and Wellbeing Hub progressing lease and operational requirements in partnership with Health. Heads of Terms formally agreed.				
<p>Create safe and cohesive communities by:</p> <ul style="list-style-type: none"> <li>Implementing with partners a targeted approach to tackling crime and anti-social behaviour in Butetown and Splott as identified priority areas in 2020;</li> <li>Working in partnership with the newly established Violence Prevention Unit at South Wales Police to develop an enhanced preventative approach to tackling violence and organised crime by March 2021;</li> <li>Strengthening governance and delivery arrangements in the Youth Offending Service by May 2020, and implementing new approaches to reduce offending and reoffending rates by January 2021;</li> <li>Delivering the actions identified in the Cardiff &amp; Vale of Glamorgan Violence against Women, Domestic Abuse and Sexual Violence Strategy 2018-2023 including the launch of a regional service for male victims by September 2020;</li> <li>Implementing the Welsh Government's Community Cohesion Delivery Plan;</li> <li>Implementing the Cardiff PREVENT Strategy by 2021.</li> </ul>	Cllr Lynda Thorne & Cllr Susan Elsmore	People & Communities, and Social Services	<p><b>P&amp;C Update – Green</b></p> <p>The IRIS worker has made contact with the High school and 2 primary schools in the Llanrumney area and is developing the project plans, training and workshop content, and making contact with remaining schools.</p> <p>The Welsh Government's Single Unified Safeguarding Review is progressing with monthly meetings being attended across 4 separate task groups</p> <p><b>Social Services Update – Amber</b></p> <p>The Youth Justice Service (YJS) Inspection Report was published and an action plan has been developed to drive improvements forward with input from across the wider Children's Services teams. Systems are in place to ensure oversight of YJS performance in the wider Children's Services context – a report card is in place and is monitored regularly at the Children's Management Team. Management arrangements have been strengthened with the addition of team manager, service manager and operational manager (OM) posts. Governance arrangements are in place to ensure oversight across YJS and wider Children's Services.</p> <p>Additional capacity has been resourced to support the development of a robust but sustainable Quality Assurance (QA) framework in the YJS. A series of workshops will be set up to take managers and staff through the requirements of what a good QA framework looks like in YJS. Children's Services OMs will attend so the format can be replicated across the wider Children's Services teams. Case Planning Forums (CPFs) are running well and are being attended by a broader range of partner agencies including</p>	G	G		

			<p>Children’s Services. However, there is concern that the number of CPF currently taking place is not sustainable in the long term. Joint daily meetings between YJS and the Multi-Agency Safeguarding Hub (MASH) have been implemented and are effective. The first tranche of YJS procedures have been signed off.</p> <p><b>P&amp;P Update – Green</b></p> <p><u>Implementing with partners a targeted approach to tackling crime and anti-social behaviour in Butetown and Splott as identified priority areas in 2020;</u></p> <p>The Community Safety Partnership has adapted at pace over the last six months to keep Cardiff safe during lockdown, the gradual reopening of the city and now a local lockdown to control the spread of the virus. Throughout, our response has relied on public services working together as one team to safeguard, protect and promote the well-being of residents.</p> <p>An interim governance structure has been in place since late March to ensure that the Community Safety Partnership can co-ordinate effective and fast-paced delivery to respond to a number of emergent priorities. Key areas of partnership delivery during this period have included supporting those at risk of homelessness, adapting provision to support victims of domestic abuse and the co-ordination of reopening public spaces to promote social distancing and compliance with Covid-19 regulations.</p> <p>The area-based working programme will resume in Quarter 3.</p> <p><u>Working in partnership with the newly established Violence Prevention Unit at South Wales Police to develop an enhanced preventative approach to tackling violence and organised crime by March 2021;</u></p>				
--	--	--	---	--	--	--	--

		<p>The Community Safety Partnership are preparing for the future commencement of the Serious Violence Bill. This includes supporting a Home Office and Violence Prevention Unit evaluation of current approaches to address Serious Violence and Serious Organised Crime in Quarter 3, participating in a review of current partnership arrangements and supporting interviews with key leaders and individuals with strategic responsibility across South Wales in early November. The evaluation will inform proposals around future governance arrangements and violence prevention initiatives.</p> <p><u>Implementing the Welsh Government’s Community Cohesion Delivery Plan;</u>          The Cohesion Team have supported engagement with a range of groups including asylum seekers and refugees, Gypsies and Travellers and faith communities to enhance the visibility and accessibility of information relating to Covid-19 regulations.</p> <p>The team have supported tension monitoring and mitigation activity in partnership with South Wales Police and the Welsh Government throughout lockdown and during recovery.</p> <p>A public appointment process and consultation on the priorities of the newly established Race Equality Taskforce has been delivered over the summer, with the first convening of the Taskforce scheduled for Quarter 3.</p> <p><u>Implementing the Cardiff Prevent Strategy by 2021</u>          All projects funded by the Home Office have had due diligence completed and are up and running, with contracts in place. Delivery plans have been amended in line with Covid-19 restrictions, for example, classroom-based training for staff is now being undertaken online.</p>				
--	--	---	--	--	--	--

			Risk assessments and action plans have been adopted by the Cardiff & Vale CONTEST board and a presentation regarding both documents has been delivered to the Community Safety Leadership Board.				
<p>Continue the implementation of a strengths-based approach to social work practice to put individuals, families and communities at the centre of their own well-being by:</p> <ul style="list-style-type: none"> <li>Continuing to implement Signs of Safety in partnership with families to support children to remain at home;</li> <li>Striving for excellence in practice by establishing and embedding strengths-based practice in Adult Services.</li> </ul>	Cllr Susan Elsmore & Cllr Graham Hinchey	Social Services	<p>Work in relation to Signs of Safety was delayed during the Covid-19 period as the lead worker was repurposed. They returned to their post full time at the end of Quarter 2 and work will be renewed going forward. This work will link closely with the Practice Development Sessions and Reunification Framework referenced above to ensure that these areas all dovetail.</p> <p>Internal mentors were previously identified and are now engaging with the training provider so that the training on strengths-based working can be re-engaged. There has been a delay due to the requirement for an element of face-to-face training, but work is now underway by the provider to deliver this virtually. Training is to recommence in Quarter 3 and the aim is to have this completed by March 2021.</p> <p>Work continues on the development of the Adult Strategy with lessons learned being incorporated from the Covid-19 period. Strengths-based approaches have been utilised via more virtual means throughout the Covid-19 period and continue in this manner. Some face-to-face has been risk-assessed due to the requirement for more in-depth and physical understanding of individuals to continue to promote well-being and independence.</p>	A	A		
Complete the move to locality working for all adult social services by 2023, aligning with primary, community and third sector services, with phase 1 completed by November 2020.	Cllr Susan Elsmore	Social Services	This project will continue to run throughout the early part of Quarters 1 and 2 next year. Current sites are being considered to support this and consideration is also being taken due to the closure of Willcox house in March 2021.	A	A		
Adopt a new Adult Services Strategy by June 2020.	Cllr Susan Elsmore	Social Services	Key themes have been identified, and discussed with engagement groups. Further engagement groups are planned in November supported with Cardiff Third Sector Council (C3SC), and contact has	A	G		

			<p>been made with the Black, Asian and minority ethnic (BAME) disability network. Technology enabling care and support is being looked at and developed into the strategy to promote well-being and independence for citizens. Discussions regarding Direct Payments have been undertaken and key threads throughout the strategy have been identified and embedded into the work so far. The Equality Impact Assessment has been started with support from the in-house team. Existing strategies have been identified for further thought and development regarding their input into the Adult Strategy. The strategy is expected to go to Cabinet in May 2021.</p>				
<p>Address specific health needs within targeted communities by working with partners to implement the 'Healthier Values' proposals by 2021.</p>	<p>Cllr Susan Elsmore</p>	<p>Social Services</p>	<p>The Single Point of Access has now been fully embedded across all hospital sites with some work still ongoing to develop the full Multi-disciplinary Team function, though this is now well underway.</p> <p>Work continues to strengthen and develop partnership working with colleagues in Health, and a focus on this continues throughout the remainder of the year. The work is expected to be completed by March 2021.</p>	<p>G</p>	<p>G</p>		
<p>Assist people with disabilities and mental health issues to be more independent by:</p> <ul style="list-style-type: none"> <li>• Embedding an all-age disability approach by March 2021;</li> </ul>	<p>Cllr Susan Elsmore</p>	<p>Social Services</p>	<p>The restructure project is now underway with some delays to phase 1 due to Covid-19 and preparation work not being completed. The restructure will ensure that the correct staff are utilised in the right way to provide the right support to people. It will develop clear pathways for professional development and accountability and promote asset based approaches, support empowering conversations for individuals and continue to work in a co-productive way to ensure the best outcomes for people.</p>	<p>R</p>	<p>R</p>		

Page 460

<ul style="list-style-type: none"> <li>Analyzing the Learning Disability Provision and the current demand levels to inform future commissioning and build programmes by October 2020;</li> <li>Working with the Police and Crime Commissioner to determine how pathways for people experiencing mental health issues can be improved by March 2021.</li> </ul>			<p>There was further delay due to Covid-19. A business analyst job is due to be advertised in the next few weeks.</p> <p>Work surrounding this has not commenced due to Covid-19 and will now be completed within the 2021-22 period. However there has been some work which has started to research service options being utilised throughout the UK.</p>				
<p>Ensure children and adults are protected from risk of harm and abuse by:</p> <ul style="list-style-type: none"> <li>Implementing the Exploitation Strategy to encompass new and emerging themes of child and adult exploitation by March 2021;</li> <li>Embedding the new All Wales Safeguarding Procedures by March 2021 – in consultation with staff and partners – to ensure that adults and children at risk are protected from harm;</li> </ul>	<p>Cllr Graham Hinchey &amp; Cllr Susan Elsmore</p>	<p>Social Services</p>	<p>The Exploitation Strategy has been published and a sub group has been established to monitor and review partner progress against the action plan. Sub groups that form part of the Regional Safeguarding Board governance structure are in place and are reviewing the exploitation action plan to gather partner feedback in relation to progress against the actions. A contextual safeguarding screening tool has been identified and is being piloted by MASH, YJS and 11+ for 2 months from early September – a decision about the toolkit for use going forward will be made following a review of the pilot. We need to ensure that new pieces of work compliment the Exploitation Strategy and that a focus on contextual safeguarding doesn't lead to familial issues being missed.</p> <p>The official launch of the Wales Safeguarding Procedures was delayed due to Covid-19 and we are awaiting confirmation of the new launch date. Virtual training for all staff is ongoing in readiness for launch. A document summarising the main changes has been shared with staff. General amendments have been made to CareFirst forms for Adult Services (e.g. references to adult at</p>	<p>A</p>	<p>A</p>		

<ul style="list-style-type: none"> <li>Making significant progress across all Council directorates to address actions identified in corporate safeguarding self-evaluations by March 2021.</li> </ul>			<p>risk). A group has been set up to ensure Children’s Services forms also reflect any key changes. More detailed changes for both Children’s and Adults are pending receipt of final forms from Welsh Government and will be accounted for in the development of Eclipse, the upgrade to the CareFirst client record system.</p> <p>Work on corporate safeguarding was delayed during the Covid-19 period as the lead Operational Manager was repurposed to cover a locality case management service. Work restarted at the end of Quarter 2 when the OM returned to their substantive post. Directorate self assessments have been issued for return early in Quarter 3. A safeguarding awareness video has been developed for launch in Quarter 3 and a newsletter has also been developed. A meeting has been held with key leads across the Council for Prevent, Human Trafficking, Exploitation, Violence against Women, Domestic Abuse and Sexual Violence (VAWDASV) and safeguarding to discuss streamlining of mandatory training modules.</p> <p>A child employment campaign has been launched to raise awareness of the safety of school age children undertaking part-time employment (e.g. paper rounds, riding stables, shops) during the Covid-19 restrictions. Although the campaign came about following the implementation of the Covid-19 restrictions as there was some confusion whether children could work during this time, it was also an opportunity to generally raise awareness about the legal requirements of the part-time employment of children, including the requirement for a work permit, types of work and hours permitted and Health &amp; Safety obligations of the employer to undertake and share a risk assessment/ Covid-19 risk assessment with the child and parents.</p>				
<p>Continue to lead an inclusive and open city to migrants, refugees and asylum seekers by:</p>	<p>Cllr Susan Elsmore</p>	<p>People &amp; Communities</p>	<p>The Council has participated in weekly Covid-19 Partnership Meetings with the Welsh Local Government Association to co-ordinate support for migrant communities in the city during the pandemic. This has included supporting a local immigration advice</p>	<p>G</p>	<p>G</p>		

<ul style="list-style-type: none"> <li>• Co-ordinating local support and information to enable EU citizens to access the EU Settlement Scheme by 31st December 2020;</li> <li>• Continuing to deliver the Inclusive Cities project.</li> </ul>			<p>charity to attract additional funding to provide legal advice to those with precarious immigration status which is placing them at additional risk to the economic and health impacts of Covid-19 and conducting a safeguarding assurance exercise for all asylum seekers in the city.</p> <p>The Council is working closely with EU Settlement Scheme (EUSS) support providers to provide digital support to EU nationals who still need to apply to the EUSS and will be completing a review of all live cases within Children’s and Adult Services in Quarter 3 to ensure that all eligible cases have been identified and supported to apply by the deadline.</p>				
<p>Promote and support the growth of the Welsh Language to help meet the Welsh Government’s ‘Cymraeg 2050: A million Welsh speakers’ strategy by delivering Cardiff Council’s commitments in the city-wide Bilingual Cardiff Strategy 2017-2022</p>	<p>Cllr Huw Thomas</p>	<p>People &amp; Communities</p>	<p>The Welsh Language Standards Annual Report 2019-20 and associated Bilingual Cardiff Action Plan was presented to the Bilingual Cardiff Cross Party Member Group on 7th September before being approved by both Cabinet and Full Council in September 2020. Key achievements include Cardiff Council’s new Street Naming Policy, which ensures parity between Welsh and English street names in the city, which was approved on 24th October 2019. Following approval, work has commenced validating current bilingual street names, preparing and standardising a list of additional bilingual street names, as well as researching and introducing new Welsh street names across the city. Also the Bilingual Cardiff Team translated 12,632,732 words in 2019-20 - more than any other year and a 10% increase on the total for 2018-19. 98.6% of all translation requests were returned to the client by the agreed deadline.</p> <p>As well as providing Welsh translation services to Cardiff Council, Bilingual Cardiff have service level agreements or contracts in place with a number of other public organisations, local authorities and partners to provide their translation services and solutions.</p>	<p>G</p>	<p>G</p>		

<p>Support grass-roots and community sports by:</p> <ul style="list-style-type: none"> <li>Working with partners to develop strategic plans for the development of sport and physical activity from March 2020 that secure increases in participation, attract investment, improve health and inequality, and ensure sustainability of provision;</li> <li>Supporting the roll-out of the 21st Century Schools Capital programme to influence design, programming and operation, ensuring local community organisations have priority access in extra-curricular time.</li> </ul>	<p>Cllr Peter Bradbury</p>	<p>Economic Development</p>	<p>Consultant partner appointed by the Partnership lead Cardiff Met. Launch re-scheduled for Quarter 3. Consultation has commenced with key stakeholders.</p> <p>Sport, Leisure and Development are members of the 21st Century Project Team (SOP) and will provide advice at the design stage of new school projects to ensure sports facilities are designed appropriately to facilitate community use. To date the team have input on the Cathays High School and provided mitigating provision for Fitzalan pupils and local clubs that are displaced during the new Fitzalan High School construction.</p>	<p>G</p>	<p>G</p>		
<p>Improve our parks and public spaces by:</p> <ul style="list-style-type: none"> <li>Growing the number of parks in Cardiff which receive the Green Flag Award – the international standard for the management of parks and green spaces;</li> <li>Working with partners in order to bring forward proposals for increasing Cardiff's tree canopy as part of the One Planet Cardiff strategy by July 2020;</li> <li>Promoting the benefits and support the development of the volunteer movement, through the Friends Forum and community based platforms;</li> <li>Putting in place a renewal programme for improving playgrounds by May 2020;</li> <li>Working in partnership with Welsh Water to bring the Llanishen Reservoir</li> </ul>	<p>Cllr Peter Bradbury</p>	<p>Economic Development</p>	<p>The Green Flag Award independent assessment for Forest Farm and Hailey Park took place week commencing 14th September.</p> <p>Proposals in the project to increase Cardiff's tree canopy are pending Coed Caerdydd funding from the Welsh Government.</p> <p>The council is also developing proposals under the Woodland Emergency Tree Fund administered by the Woodland Trust and the Climate Emergency fund administered by Trees for Cities.</p> <p>The Friends Forums and community based platforms is anticipated to start up in the Autumn – much of this work has been put on hold as volunteers fall into the vulnerable demographic group and therefore under Covid-19 social restrictions.</p> <p>The Playground Project Plan is in place, the Procurement Framework for design and build is in place and briefs developed for a wide range of projects. Lot 1 is out to tender.</p>	<p>G</p>	<p>G</p>		

<p>site back into use for sailing and other recreational purposes.</p>			<p>The construction work to restore Llanishen Reservoir has been completed with the refill scheduled to take place in spring 2021. Welsh Water have completed the pre planning application public consultation and the feedback will form part of the visitor centre planning application pack that is due to be submitted in October.</p>				
--	--	--	--	--	--	--	--

## Well-being Objective 5

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
Play a leading role in the design and delivery of city-regional governance for economic development, planning and transport that reflects the unique role that the capital city plays in the Capital Region by 2021.	Cllr Huw Thomas	Economic Development	The Council has Continued to contribute towards discussions and consultation exercises.	G	G		
Work with the UK Government and Welsh Government to implement a programme of investments over the next five years to deliver investment and capacity improvements at Cardiff Central Station.	Cllr Russell Goodway & Cllr Caro Wild	Economic Development	Funding has been secured for development of the business case through City Deal. Network Rail have issued a schedule of items for inclusion in the final scheme and are awaiting sign off.	G	G		
Grow the city centre as a location for businesses and investment, delivering an additional 300,000ft <sup>2</sup> of 'Grade A' office space by 2022, by working with partners to: <ul style="list-style-type: none"> <li>Complete the regeneration of Central Square;</li> <li>Begin the Central Quay development extending the business district south of the station;</li> <li>Support the completion of Capital Quarter and the next phase of regeneration of Callaghan Square;</li> <li>Develop a new masterplan for the Canal Quarter area.</li> </ul>	Cllr Russell Goodway	Economic Development	Work continues to complete Central Square, but has been impacted by market demand.  The Council are assisting Rightacres in the development of Central Quay however; there is a Covid-19 impact on investor confidence.  The Council are assisting John Smart the developers in the development of Capital Quarter and Callaghan Square however, there is a Covid-19 impact on investor confidence.  We are awaiting the conclusion of the Indoor Arena procurement to finalise the masterplan for the Canal Quarter area. A decision is awaited on the Indoor Arena.	A	A		
Write a new chapter in Cardiff Bay's regeneration story by:	Cllr Russell Goodway	Economic Development	A report has been drafted to go to Cabinet in November to agree the preferred bidder for the Indoor Arena.	A	A		

<ul style="list-style-type: none"> <li>Delivering the new 15,000-capacity Multi-Purpose Indoor Arena by 2024;</li> <li>Completing a procurement exercise for the next phase of development of the International Sports Village by October 2020;</li> <li>Bringing forward proposals to protect and revitalise historic buildings in the Bay and provide support for the completion of the ongoing redevelopment of the Coal Exchange;</li> <li>Commencing delivery of a new mixed-use development at Dumballs Road by 2021, including the delivery of 2,000 homes.</li> </ul>			<p>Due to Covid-19 there is a six-month delay for the next phase of development of the International Sports Village and the procurement process will commence early in 2021.</p> <p>Continued work to develop proposals with the private sector to bring forward proposals to protect and revitalise historic buildings in the Bay, but with obvious implications in the current investment climate.</p> <p>Dumballs Road developer to submit a planning application early in 2021.</p>				
<p>Work with private partners to attract investment in innovation and start-up space across the city.</p>	<p>Cllr Russell Goodway</p>	<p>Economic Development</p>	<p>Continued work to develop proposals with the private sector to attract investment in innovation and start-up space, but with obvious implications in the current investment climate.</p>	<p>G</p>	<p>G</p>		
<p>Support innovation and industry by:</p> <ul style="list-style-type: none"> <li>Supporting the completion of Cardiff Parkway as part of our Industrial Strategy for the east of the city;</li> <li>Working with City Deal partners, the private sector and the University Health Board to explore the potential of developing proposals for the creation of a Science Park Campus at Coryton;</li> <li>Working with Clwstwr Creadigol to attract further investment in establishing a creative industries network for Cardiff to support the growth of creative enterprises in the city.</li> </ul>	<p>Cllr Russell Goodway</p>	<p>Economic Development</p>	<p>Cardiff Parkway planning application is expected within timescale.</p> <p>Proposal currently being considered by City Deal.</p> <p>Aim for Strength In Places (SIP) fund to be submitted in November 2020 to support the growth of creative enterprises.</p>	<p>G</p>	<p>G</p>		

Establish a new Tourism Strategy, including delivery arrangements by spring 2021.	Cllr Russell Goodway	Economic Development	Tourism Strategy and delivery arrangements delayed to reflect changing tourism market post-Covid-19.	A	A		
<p>Keep our cultural scene as the beating heart of city life by:</p> <ul style="list-style-type: none"> <li>Co-ordinating the Cardiff Music Board and developing a Music Strategy through the Board and in partnership with the Welsh Government by March 2021;</li> <li>Considering development and investment opportunities for St David's Hall by 2021;</li> <li>Developing a Cultural City Compact approach with the cultural sector as a means for taking forward a new Cultural Strategy for Cardiff by March 2021.</li> </ul>	Cllr Peter Bradbury	Economic Development	<p>Music Board established, strategy delayed into post-Covid-19 world.</p> <p>The council continues to look for development and investment opportunities for St David's Hall.</p> <p>Will continue to develop a Cultural City Compact approach in timescales, but implementation likely to be delayed until 2021-22.</p>	A	A		
<p>Bring world events to Wales and take the best of Wales to the world through the development of an events portfolio including:</p> <ul style="list-style-type: none"> <li>The development of a 'signature music event' by October 2020;</li> <li>Working with PRO14 Rugby to facilitate the hosting of the Guinness PRO14 Final at Cardiff City Stadium on 20<sup>th</sup> June 2020;</li> <li>Working in partnership with the Welsh and UK Governments to inform the feasibility of a 2030 FIFA Football World Cup bid.</li> </ul>	Cllr Peter Bradbury	Economic Development	<p>In view of Covid-19 restrictions the council is looking to reschedule the Signature Music event to 2021.</p> <p>Progress on the development of the Events Portfolio has been impacted by the Global Covid-19 Restrictions. The Welsh Government Major Event Review has been postponed until Spring/Summer 2021 with current focus on survival of the sector. Cardiff Council is represented on the Wales Event Advisory Board and officers continue to support and work with Welsh Government to host and develop test events. Monthly Welsh Government/ Cardiff Council event planning meetings are ongoing to ensure future opportunities are identified and considered. Guinness Pro 14 Final was cancelled by organisers.</p>	A	A		

			No progress to report to date concerning work on the feasibility of a 2030 FIFA Football World Cup bid due to a focus on Covid-19. Ongoing.				
--	--	--	---	--	--	--	--

## Well-being Objective 6

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
<p>Deliver a comprehensive programme of improvement to the Council's Street Scene services through integration, digitalisation and the use of data to support efficient and effective use of resources.</p>	<p>Cllr Michael Michael</p>	<p>People &amp; Communities</p>	<p>A booking system was implemented for the Recycling Centres to support them reopening at the end of May 2020. The digital booking of bulky item collections was launched on 9th September 2020 on both the website and Cardiff Gov app.</p> <p>Covid-19 has impacted on service demands and although measures have been taken to mitigate the impacts the data is being skewed with lockdown measures influencing resident behaviour.</p> <p>Data continues to be collected across Street Scene services to inform service provision in relation to pressures and areas of concern.</p>		<p>A</p>		
<p>Deliver a tailored neighbourhood management approach to improving street cleanliness in targeted communities by December 2020.</p>	<p>Cllr Michael Michael</p>	<p>People &amp; Communities</p>	<p>Inner ward areas of Cathays, Plasnewydd, South Riverside, Grangetown and Splott have additional resource to provide cleansing services every weekday afternoon. A review has taken place on wards in the southern arc and service model prepared.</p> <p>The Estate Management plan for improvements relating to Council Estates and the service model for the southern arc have been put on hold until there is clarity around budgets and expenditure across the Council relating to Covid-19.</p> <p>Work is continuing to deliver a new service model for waste and recycling collections to be delivered in February 2021.</p> <p>We are moving to a four-day working model where waste is collected between 6.00 and 15:45 – it reduces collection working window by 50% so should make the streets look cleaner – needs to be backed up with data following the changes.</p>		<p>A</p>		

<p>Engage with citizens and businesses on concerns in their communities through 'Love Where You Live' to encourage volunteering and working in collaboration</p>	<p>Cllr Michael Michael</p>	<p>People &amp; Communities</p>	<p>Work has progressed in relation to 'unloved spaces' (spaces on the highway which are licensed to the community to improve) and supporting licensing of areas to communities to improve.</p> <p>Covid-19 has meant group gatherings and the litter picking kits in Hubs have not been accessible. Volunteer groups like Cardiff Rivers Group are working with controls in place for Covid-19 allowing them to undertake activities like cleansing around the edge of Cardiff Bay.</p>		<p>A</p>		
<p>Deliver the recycling services strategy to achieve 70% recycling performance by 2024-25 by:</p> <ul style="list-style-type: none"> <li>Continuing project work with Welsh Government, Waste &amp; Resources Action Programme (WRAP) and local partnerships;</li> <li>Completing a whole systems review and options modelling for waste management service by May 2020 to collect better quality recycling material, improve service delivery and increase operating efficiency;</li> <li>Preparing a Business Case and draft implementation plan by September 2020;</li> <li>Commencing implementation by January 2021</li> </ul>	<p>Cllr Michael Michael</p>	<p>People &amp; Communities</p>	<p>Changes to waste and recycling collections due to Covid-19 meant that between 30th March and 1st June all waste and recycling collected from residents was sent to the Energy from Waste plant. The Quarter 1 2020-21 Recycling Performance is 42.51% compared to 62.57% in the previous year.</p> <p>Work continues to take place with Welsh Government, Waste &amp; Resources Action Programme (WRAP) and Local Partnerships to review how Cardiff can achieve the Welsh Government target of 70% by 2024-25.</p>		<p>R</p>		
<p>Launch an education campaign to promote changes in resident behaviour in March 2020 and monitor improvements throughout 2020-21.</p>	<p>Cllr Michael Michael</p>	<p>People &amp; Communities</p>	<p>The pink sticker campaign was put on hold during Covid-19 and was recommenced in August/ September 2020.</p> <p>Communications and media posts about the pink sticker campaign have been undertaken to support the delivery of the education to improve resident behaviour</p>		<p>A</p>		

<p>Develop a citizen-based strategic plan for new and existing recycling centres and improve re-use/recycling to 80% in centres by March 2021.</p>	<p>Cllr Michael Michael</p>	<p>People &amp; Communities</p>	<p>The citizen-based strategic plan has not yet been developed to date. We will be looking at changing our model and have a strategic plan to support the improvements we have gained in this area. We are currently gathering data.</p> <p>The new booking system and controls at Recycling Centres have supported improving recycling performance to 90%.</p> <p>Ongoing support to embed the booking service and controls into a new service model for Recycling Centres</p> <p>Report to Cabinet on how the changes have improved the service using core data.</p>		<p>G</p>		
<p>Remove single-use plastics from Council venues and work with partners to develop a city-wide response to single-use plastics in all public services by March 2021.</p>	<p>Cllr Michael Michael</p>	<p>People &amp; Communities</p>	<p>The One Planet Cardiff strategy is due to go to Cabinet in early Quarter 3. The strategy includes details of how the Council will work with partners to develop a city-wide response and how the Council will eradicate the use of single-use plastics by the Council. For example, a review has already taken place on the procurement of the single-use plastics bags used for residual waste and for co-mingled recycling in some parts of the city.</p>		<p>R</p>		
<p>Launch the One Planet Cardiff Strategy by May 2020 and bring forward a delivery plan by October 2020.</p>	<p>Cllr Huw Thomas</p>	<p>Planning, Transport &amp; Environment</p>	<p>The Strategy is now scheduled to be approved for public consultation at October's Cabinet</p> <p>There was a slight delay in order to have all consultation materials and the associated website ready for the publication date.</p>		<p>G</p>		
<p>Implement the Low Emission Fuels Strategy to convert the Council's fleet to low emission fuels and ensure 90 Council vehicles are converted to electric power by 2021.</p>	<p>Cllr Michael Michael</p>	<p>Planning, Transport &amp; Environment</p>	<p>Reducing total numbers of fleet vehicles and mileage is in line with reduced usage and greater numbers of staff home working. 20 pool cars have been off hired and returned and thus are no longer available.</p> <p>CTS are intending to review the wider fleet with Welsh Government Energy Service/ Ultra Low Emission Vehicles (ULEV). Following this review a revised timetable will be known or the</p>		<p>A</p>		

			<p>delay period to the original plan. Potentially pushed back by 1 year.</p> <p>Further review with Welsh Government Energy Service will enable a more robust assessment on vehicle and infrastructure requirements at Council locations.</p>			
<p>Work with the taxi trade to develop a phased transition for Cardiff licensing conditions by:</p> <ul style="list-style-type: none"> <li>Requiring vehicles to have a minimum Euro 6 emission standards by December 2021;</li> <li>Developing a medium-term strategy to ensure the Cardiff taxi fleet are all Ultra Low Emission Vehicles.</li> </ul>	<p>Cllr Michael Michael</p>	<p>Planning, Transport &amp; Environment</p>	<p>As a result of the impact of Covid-19, a commitment was given from Leader that this policy would not be implemented in immediate future. Ongoing discussions with Welsh Government over providing an enhanced mitigation package to support uptake of ULEV taxis is ongoing and decision is due imminently. Further assessment of funding from additional Welsh Government sources is being investigated. Currently the date of the revised policy introduction is not known and will be dependent on future discussions with the trade.</p> <p>Welsh Government are unlikely to provide any funding for any transition of Euro 6 vehicles as this is against the policy direction of Zero Emission fleet by 2028. Covid-19 severely impacted the trade and thus further implementation of Euro 6 policy will be met with strong opposition from trade.</p> <p>We are waiting on confirmation from Welsh Government on an enhanced funding package to support taxi drivers to switch to ULEV. We are also looking at the possibility of developing a business case for longer term leasing option.</p>		A	
<p>Ensure good air quality by implementing and evaluating the:</p> <ul style="list-style-type: none"> <li>Clean Air Plan as approved by Welsh Government to ensure compliance with the EU Limit Value for Nitrogen Dioxide (NO<sub>2</sub>) in the shortest possible time by the end of 2021;</li> </ul>	<p>Cllr Michael Michael</p>	<p>Planning, Transport &amp; Environment</p>	<p>The overall air quality has been significantly improved to the WG timescales, however further scheme development required.</p> <p>Monitoring stations have been implemented in City Centre at 5 locations with live data being captured from early August. A permanent station has been installed on Castle Street, with ongoing commissioning works.</p>		G	

<ul style="list-style-type: none"> <li>Wider Clean Air Strategy measures to ensure a continued reduction of NO<sub>2</sub> concentrations is achieved across the city.</li> </ul>			<p>There are delays to Bus Retrofit Scheme due to state aid notification process and impacts from Covid-19. The scheme is gearing up for launch in October 2020.</p> <p>The revised Taxi scheme has been further assessed and reported to Welsh Government. A decision is awaited on this before being able to launch with the trade.</p> <p>An on-going dialogue is taking place with Welsh Government over any revision to Castle Street Scheme to ensure that compliance can still be achieved in shortest possible time.</p>				
<p>Progress the business case for an innovative heat network scheme to serve areas of the Bay and city centre by commencing a formal procurement for a delivery contract by May 2020, subject to grant funding.</p>	<p>Cllr Michael Michael</p>	<p>Planning, Transport &amp; Environment</p>	<p>Grant and loan funding have been secured and the project is currently out to procurement with initial bids expected by the end of September</p>		G		
<p>Deliver a 9 Megawatt Solar Farm at Lamby Way by May 2020</p>	<p>Cllr Michael Michael</p>	<p>Planning, Transport &amp; Environment</p>	<p>The solar farm structure is complete and capable of producing energy, awaiting connection to the National Grid.</p> <p>Connection to a nearby electricity consumer via a private wire connection is scheduled to commence mid-September, but is dependent on Natural Resources Wales granting flexibility around some ecological constraints. An embargo on works in the Rumney estuary has been imposed by them. Discussions are taking place about potential additional flexibility but if they are not successful, this will delay the private wire completion until April 2021.</p> <p>Until this connection is made, the energy produced by the solar farm will go to the National Grid.</p>		G		
<p>Promote healthy, local and low-carbon food by delivering the Cardiff Food Strategy by 2023.</p>	<p>Cllr Michael Michael</p>	<p>Planning, Transport &amp; Environment</p>	<p>The Food Strategy Steering Group has been formed and the first meeting held. The Sustainable Food Standards have been drafted and Food Growing Plan task and finish group formed.</p>		G		

			<p>The Food chapter has been written and included in One Planet Cardiff, the Council's response to the declared Climate Emergency.</p> <p>The recruitment to a three-year post to support the implementation of the Council's Food Strategy was put on hold due to Covid-19 related budget issues. The actions in the Food Strategy will be prioritised due to reduced resources.</p>			
Develop a sustainable water, flood and drainage strategy for Cardiff by 2021.	Cllr Michael Michael	Planning, Transport & Environment	<p>This strategy has been put on hold for 12 months due to the ongoing effects of the February 2020 storms on the Flood Risk Management Team and the ongoing demands related to Covid-19.</p> <p>Resource issues related to flooding events and Covid-19 are preventing progress. A continuing review of resources is taking place in order to bring work back on track.</p>		A	
Complete coastal defence improvements in Cardiff East by December 2022.	Cllr Michael Michael	Planning, Transport & Environment	<p>Ground Investigation works were completed by the end of May 2020 and the results subsequently analysed. The final business case and detailed design will now be completed to enable commencement of construction works.</p> <p>There are difficult conditions for construction along with agreement/licences required to enter the river estuary from NRW.</p> <p>A detailed and comprehensive design to address challenging conditions and ongoing consultation with WG and NRW.</p>		G	
Deliver phase 1 of the new Canal Quarter scheme by 2022.	Cllr Michael Michael	Planning, Transport & Environment	<p>Detailed design being progressed to ensure a high quality and environmentally sound scheme that will complement the city centre masterplan will be implemented</p> <p>There timescale and delays related to Covid-19 pressures. The Directorate will continue to ensure integration with city centre transport masterplan schemes</p>		G	

<p>Conduct a full review of the Local Development Plan by 2023 and engage in dialogue on regional strategic planning arrangements.</p>	<p>Cllr Caro Wild</p>	<p>Planning, Transport &amp; Environment</p>	<p>The Local Development Plan (LDP) Review Report and Delivery Agreement were due to be considered by Cabinet and Council in March 2020. Approval of these documents for submission to Welsh Government would have triggered the formal commencement of the LDP review.</p> <p>However due to the Covid-19 pandemic these meetings were cancelled. Welsh Government guidance issued in July 2020 states that Local Planning Authorities should consider the implications of the pandemic for LDP reviews; given this the draft review report and Delivery Agreement are being revised to take account of the implications of Covid-19. These revised documents are due to be considered by Cabinet and Council in November 2020, with consultation planned for January and February 2021 and a further report to Cabinet and Council seeking approval for formal commencement in Spring 2021.</p> <p>It is vital that the revised Review Report and Delivery Agreement are revised to take into account the implications of the pandemic. The Review Report needs to take account of new Welsh Government planning guidance set out in “Building Better Places”, implications for the Replacement LDP evidence base and the LDP strategy and policies. The Delivery Agreement needs to include a revised timetable for review of the plan and the need to revisit the consultation and engagement methods in light of potential new waves of infection and the need to maintain social distancing</p> <p>Given the delay to the review of the LDP the date for completion of the full review of the LDP is now 2024 in proposed timetable for the LDP due to be considered by Cabinet and Council in November 2020.</p>		<p>G</p>		
--	-----------------------	--	---	--	----------	--	--

			As set out above the pandemic led to the Cabinet and Council meetings planned for March 2020 being cancelled and therefore formal commencement of the review process has been delayed. In line with Welsh Government guidance a revised Review Report and Delivery Agreement are being produced to take into account the implications of the pandemic and these are due to be considered by Cabinet and Council in November 2020.			
Support the delivery of high-quality, well designed, sustainable and well-connected communities as described by the Council's Master Planning Principle.	Cllr Caro Wild	Planning, Transport & Environment	The master planning approach continues to be successfully secured on new developments across the city, including LDP Strategic Sites and Council led developments. The review of achievements and identification of future priorities is ongoing. Data collection for monitoring framework indicators are ongoing as part of LDP Annual Monitoring Report.		G	
Deliver the Council's Green Infrastructure Plan. Page 477	Cllr Caro Wild	Planning, Transport & Environment	An internal officer working group has been established to define project parameters and prepare a project brief. Work is currently being undertaken to review existing plans / guidance and to prepare a template for first draft of the document to align with Cardiff One Planet Strategy and emerging Local Development Plan Review.  There are potential issues of availability of staff time and resources across the different service areas with regard to other workloads / priorities. The group will meet following completion of document template to review / agree workloads, anticipated timescales and reporting / approval processes.		G	
Work with Welsh Government, Transport for Wales and other partners to: <ul style="list-style-type: none"> <li>• Deliver new stations at Loudoun Square, in the heart of Cardiff Bay, Crwys Road and Roath Park by 2024;</li> <li>• Establish a new mainline train station at Cardiff Parkway in St Mellons by 2023 and work with partners to complete the Eastern Bay Link Road;</li> </ul>	Cllr Caro Wild	Planning, Transport & Environment	The working relationships with the Cardiff Capital Region City Deal, Transport for Wales and Welsh Government have progressed enabling agreement on investments in the Central Interchange Transport Hub and Central Station. Governance and working arrangements for Cardiff Council to engage in discussions with Transport for Wales (TfW) and TfW Rail (KeollisAmey) have been established. The overarching business case for the Metro, including the Cardiff Core Metro/Cross-rail, is being developed.		G	

<ul style="list-style-type: none"> <li>• Deliver a Bus Strategy for the city by 2020, including a new cross-city bus interchange at Waungron Road, providing connections to the University Hospital of Wales and linking to the east of the city by 2021;</li> <li>• Deliver new park and ride facilities at Llanilltern (Junction 33 of the M4) by 2023.</li> </ul>			<p>Working groups with TfW and TfW Rail have been established to progress the preparation of business cases for improvements to stations, new stations and line extensions in Cardiff. Further study work is progressing by TfW following transfer of ownership of the Core Valley Lines from Network Rail to the Welsh Government including a collaborative bid to the Department for Transport for a new station at Ely Mill/Victoria Park.</p> <p>Key studies being progressed include Cardiff Central to Cardiff Bay, Cardiff Central to Pontyclun in the North West Corridor. Further extensions as part of the Core Metro/Cross-rail will involve further study work for the sections from Radyr to Coryton, Western Junction to Cardiff Central, Cardiff Bay to Roath Dock/Porth Teigr and Roath Dock to Newport Road/Cardiff Parkway St Mellons.</p> <p>Potential key issues include timely delivery of Metro improvements and extension aspirations in Cardiff. This is being mitigated through the Governance structure and programme of study work</p>				
Continue to progress the City Centre Transport Masterplan projects from 2020 through to 2022	Cllr Caro Wild	Planning, Transport & Environment	<p>The Central Square transport scheme is now on site. Detailed design all other projects is progressing, as is continued traffic modelling and option testing.</p> <p>Key issues affecting the projects are Covid-19 Programme Delay and staff resources. These issues will need to be mitigated by reprogramming to take account of Covid-19, and merging of schemes with Recovery Projects. Sourcing of agency staff and consultancy support will also be required.</p>		G		
Programme the delivery of the bridge crossing scheme at Llanrumney as part of a wider regeneration scheme.	Cllr Caro Wild & Cllr Lynda Thorne	Planning, Transport & Environment	A report to progress with the project and disposals is being brought forward to Cabinet in December 2020.		G		

Invest £20m in a new fully segregated, safe cycling network across the city by 2022.	Cllr Caro Wild	Planning, Transport & Environment	<p>North Road Phase 2 Scheme completed, phase 2 of Cycleway Way 1 consultation completed, Hailey Park consultation completed and solution agreed with Members; detailed design commenced.</p> <p>Contracts have been let for both phase 1 of Cycleway 4 and the Gold Pop-up Route, work on both sites commenced at the end of September.</p> <p>Key issues affecting the projects are Covid-19 Programme Delay and staff resources. These issues will need to be mitigated by reprogramming to take account of Covid-19, and merging of schemes with Recovery Projects. Sourcing of agency staff and consultancy support will also be required.</p>		G		
Develop a new Active Travel Network Map by 2021.	Cllr Caro Wild	Planning, Transport & Environment	<p>Initial engagement with schools and families has been undertaken along with an initial information gathering process. Technical work for the initial draft Active Travel Network Map is in progress.</p> <p>The statutory submission date is September 2021. Public consultation is required for a statutory 12 week period in early 2021. This needs to be timed to avoid clash with pre-election period for Welsh Government elections in 2021. The final revised Active Travel Design Guidance has not yet been published by Welsh Government.</p> <p>Programme has been revised to take account of these constraints.</p>		G		
Roll out 20mph speed limits across the city by 2022.	Cllr Caro Wild	Planning, Transport & Environment	Plans have been developed for Splott, Butetown, Canton/Riverside, Llandaff, and Creigiau. Traffic Regulation Orders processes are underway. Initial scoping work with Welsh Government has commenced to assist on an evaluation pilot of processes to inform guidance on a future 20mph default speed limit in built up areas.		G		

			The go-ahead from Welsh Government on the evaluation pilot is awaited. Mitigating actions will be dependent on the detail received from Welsh Government.			
Expand the on-street cycle hire scheme and complete roll out of e-bike fleet by June 2020.	CLlr Caro Wild	Planning, Transport & Environment	<p>Ebikes infrastructure planning is underway to locate 125 bikes in key appropriate locations across the city. The focus will be on connecting the Bay with the city centre in the first instance.</p> <p>Permissions for accessing power at selected Council buildings may delay some locations, along with Land ownership/power issues may cause delays for finding other appropriate locations. Covid-19 measures have impacted implementation of timescales.</p> <p>Facilitation via OneFrontDoor system and sourcing alternative sites where initial locations are unsuitable.</p>			G
Ensure all Cardiff schools have Active Travel Plans by 2022.	CLlr Caro Wild	Planning, Transport & Environment	<p>Progress:</p> <p>Temporary School Street closures were implemented at end of summer term outside 24 schools.</p> <p>9 new camera enforced School Streets are due to go live on 2<sup>nd</sup> November.</p> <p>New CCTV cameras have been installed at 16 schools to enforce Keep Clear markings.</p> <p>There has been some good collaboration between Transport team, Corporate Health and Safety and Education teams to address various issues arising from traffic and parking issues around schools and facilitating new Covid19 school access arrangements.</p> <p>54 schools were supported to develop Active Travel Plans during Quarter 1 and Quarter 2</p>			G

			<p>660 bicycles have been provided to over 30 Cardiff schools with funding from Welsh Government. This fleet of bicycles will be housed in on-site containers on school sites making them easily available for balance bike training and National Standards Cycle Training activities.</p> <p>A further phase of bikes is being planned for other schools and schools have been invited to express their interest to receive a new bike fleet.</p> <p>Key Issues: There is very high demand for the implementation of new school streets projects putting pressure on team capacity to deliver Active Travel Plans.</p> <p>Mitigating Actions: Support for School Streets programme now being provided from with Transport Policy team Establish whether School Streets enforcement revenue can cover some costs of Active Travel Schools team</p> <ul style="list-style-type: none"> <li>• Potential income-generating opportunity from co-ordinating regional School Streets bid.</li> </ul>				
Complete the 'Healthy Streets' pilot and assess its impact by 2021	Cllr Caro Wild	Planning, Transport & Environment	<p>Progress: Living Streets have completed their study focussing on Plasnewydd identifying a number of actions.</p> <p>A Community Group (drawing from the membership of existing community groups in Plasnewydd and Roath/Penylan areas has been established by Living Streets. Arrangements for officer engagement with this group will be made in the near future. The Living Streets report identified a number of measures such as Parklets (pop-up amenity spaces – seating, planting areas –</p>		A		

		<p>provided on street) and de-cluttering of street furniture which could potentially be delivered as part of Covid19 interventions, in particular, the potential Pop-Up segregated cycle route running along the Albany Road corridor which is currently being investigated.</p> <p>Key Issues: Additional officer capacity is required to deliver the Pop-Up route and interventions identified in the Living Streets report.</p> <p>The engagement carried out by Living Streets which is the subject of their report has been a useful experiment in engagement with residents and understanding their views of the streets in their area, key issues and what improvements they would like to see. However, due to Covid it will not be possible to actually pilot any physical Healthy Streets measure during this financial year.</p> <p>Mitigating Actions: Additional staff being sourced through agencies and consultants. The Council will engage with Living Streets and the local community group on the design of the proposed Pop-Up cycle route to identify opportunities for delivering some of the measures recommended in the Living Streets report. Officers will consider opportunities for developing a pilot for a Low Traffic Neighbourhood scheme as recommended in the Living Streets report.</p>				
--	--	--	--	--	--	--

## Well-being Objective 7

Steps	Lead Member	Lead Directorate	Update	Q1 RAG	Q2 RAG	Q3 RAG	Q4 RAG
<p>Deliver fewer and better Council buildings and protect the Council's historic buildings by:</p> <ul style="list-style-type: none"> <li>Developing a new property strategy by December 2020 to rationalise and de-carbonise Council buildings, ensuring Council staff are located in buildings that have the highest environmental standards;</li> <li>Developing a plan to secure investment into the Council's historic assets including City Hall and the Mansion House by March 2021;</li> <li>Reviewing the Council's existing business estate to identify potential disposals to generate capital receipts to invest in the retained estate.</li> </ul>	Cllr Russell Goodway	Economic Development	<p>The Core Office proposal is anticipated to go to Cabinet at the end of the year. This will be based on and will inform the development of the wider property strategy. The property strategy going forward will reflect changes to working practices anticipated as a result of flexible working arrangements fast-tracked during Covid-19.</p> <p>It is anticipated that City Hall proposals will be included in the Core Office Report going to Cabinet at the end of the year.</p> <p>The Estates Team is currently examining various properties and particular portfolios within the council estate to identify disposal and investment opportunities.</p>	A	A		
<p>Reduce sickness absence rates by:</p> <ul style="list-style-type: none"> <li>Continuing to supporting staff well-being, particularly through providing additional support for staff suffering with poor mental health;</li> <li>Strengthening management practice across all directorates, with a focus on reducing long-term sickness absence rates.</li> </ul>	Cllr Chris Weaver	Resources	<p>Quarter 1 sickness forecast outturn was 7.22 days per FTE against a target of 9.5 days per FTE. Quarter 2 was 7.66 days per FTE. These figures include all sickness including any that was Covid-19 related. During the last quarter of 2019-20 considerable effort was undertaken to review long term sickness cases and the result was that the level of cases reduced from 331 to 191 by the end of the first quarter of 2020-21. A national agreement was in place between employers and the trade unions from the middle of March and the end of July that no casework would be undertaken, therefore this has impacted on these case numbers in Quarter 2 which have increased to 249. However, casework restarted in Quarter 2 with support provided to Managers and</p>	G	G		

			<p>Schools to support sickness cases. Regular sickness data had continued to be supplied to Directorates and Schools. The lockdown during Quarter 1 and the continued restrictions during Quarter 2 has had a significant impact on the face-to-face health and well-being interventions supplied corporately and through Occupational Health, such as sports massage, physiotherapy, health screening and counselling support. However increased support for mental health and well-being has been provided through changes to the Carefirst Contract as well as re-direction of the in-house counselling team to delivery of virtual support groups for key workers. Welfare contacts with staff shielding/self-isolating at home were a priority. Changes made to Cognitive Behavioural Therapy delivery, moving from external service through the University Health Board to an in-house service, reducing costs and improvement delivery of trauma counselling. Workforce Risk Assessment Support has been provided for staff returning from self-isolation due to medical vulnerability. In Quarter 2, virtual physio/DSE support was provided for home workers, with priority given to those covered by the Equalities Act. Mental health and well-being support sessions have been provided for shielding staff and follow-up sessions with an Occupational Health Physician where required. Also in Quarter 2, specific mental health and well-being support has been provided for school-based staff to help them with the return to school at the start of the new academic year.</p>			
<p>Work towards achieving the Gold Level Corporate Health Standard Award by March 2021 by progressing the initiatives that are set out in the standard.</p>	<p>Cllr Chris Weaver</p>	<p>Resources</p>	<p>The progression of the Gold Award will be delayed due to the pandemic; the necessity for many of the core buildings to be vacant which does not allow the activities which are required for Gold standard to be demonstrated. We have continue to look at best practice with regards to employee health and wellbeing and implemented a number of activities virtually as well as providing information to employees to support them. Any future policies or activities will reflect the needs of the Gold Award so we are ready to apply when the time is right. Silver validation is due to</p>	<p>A</p>	<p>A</p>	

			expire in March 2021. The re-validation is a desk-top exercise with a paired down action plan which will be completed. A number of different action plans are being reviewed around disability and carer confident to support the Silver re-validation. The appropriate representative at Public Health Wales has been contacted to confirm if any awards were being processed due to the pandemic and whether there is a changed process. Public Health Wales have confirmed that organisations will have a 6 months leeway from the end date of our award to complete the re-validation Work will continue in the background to ensure that we can reapply when we have had confirmation of the current process.				
Build on the Agency Workers Charter by: <ul style="list-style-type: none"> <li>Continuing the process of transferring long-term agency staff into permanent contracts;</li> <li>Reviewing agency workers placed with the Council via the Into Work Service.</li> </ul> Page 485	Cllr Chris Weaver	Resources, and People & Communities	<b>Resources Update – Green</b> Quarterly monitoring information on agency workers and those with over 18 months’ tenure was distributed to Directorates and discussed at the Trade Union Partnership meeting for Quarter 1. Quarter 2 data is being developed for distribution and discussion with Trade Unions. During Quarter 1 it was difficult for managers to reduce this as they required agency staff to backfill vacancies for staff unable to work due to Covid-19 restrictions. However, work is now underway to reduce the long-term agency staff through recruitment activities in areas of waste management and social services.	G	G		
Ensure that the Council’s workforce is representative of the communities it serves by: <ul style="list-style-type: none"> <li>Ensuring that our recruitment processes are not biased;</li> <li>Supporting careers events in our least represented communities;</li> <li>Reviewing current arrangements for Cardiff Works staff.</li> </ul>	Cllr Chris Weaver	Resources, and People & Communities	<b>Resources Update – Green</b> Work has continued to bring young people into the organisation through the Council’s Apprenticeship and Trainee scheme. Work experience has not been able to take place during Quarters 1 and 2, but virtual work experience is being developed in order to provide opportunities.  All adverts on the Council’s website encourage applicants from under-represented groups. Work is being undertaken with the Council’s career site provider on how this site can reach a wider	G	G		

			<p>audience. Also work is being undertaken to share information and best practice with Core Cities.</p> <p>Cardiff Academy have reviewed Recruitment &amp; Selection training, enhancing training content in relation to unconscious bias awareness in the form of a mandatory eLearning module to be completed prior to attending workshop. Also during Quarter 2 Cardiff Academy have adapted Recruitment &amp; Selection training to a virtual format (reduced from 1.5 day classroom-based to a five-hour online session) and relaunch alongside accompanying eLearning module.</p> <p>A presentation is available communicating the results of the Stonewall Workplace Equality Index (WEI) and will be presented during Quarter 3. Due to the Covid-19 pandemic, Stonewall have decided that there will be no WEI submissions for 2020 with the next submission by September 2021 based on a revised criteria which will be presented to SMT during Quarter 3.</p>				
<p>Progress and deliver our customer service agenda with a focus on:</p> <ul style="list-style-type: none"> <li>Delivering a programme of online and classroom-based customer service training;</li> <li>Recruiting customer and digital champions across the organisation;</li> <li>Reviewing customer services satisfaction through biannual benchmarking surveys.</li> </ul>	Cllr Chris Weaver	Resources	<p>Virtual course has been created and a number of sessions has been delivered.</p> <p>COMMS have been sent council wide and training dates are available on DigiGov up until December for all staff to book on to.</p>	G	G		
<p>Get the best social and community value out of the Council's £430m annual spend on goods and services by adopting a 'Social Value' framework for assessing contracts, with implementation commencing by May 2020.</p>	Cllr Chris Weaver	Resources	<p>The Procurement Team have played an active / leading role in the development of the TOMS for Wales which are due to be launched on 17th and 18th November.</p>	G	G		

Continue to support the Foundational Economy through our Socially Responsible Procurement Policy, ensuring that local people and communities benefit from the money that the Council spends on goods and services and working with partners to explore how we can further promote opportunities for Social Enterprises in Cardiff.	Cllr Chris Weaver	Resources	This work was planned to be undertaken as part of a Foundational Economy Bid to Welsh Government, the bid was unsuccessful. This will be picked up in Quarter 3, with trend analysis for the over last 3 years used to support the drafting of a Social Enterprise Plan for Cardiff.	G	A		
Strengthen social partnership arrangements in Cardiff by updating our procurement strategy to promote fair work and support the circular economy by October 2020.	Cllr Chris Weaver	Resources	Aim was to future proof the Council's Procurement Strategy by waiting for Social Partnership Bill and the accompanying statutory guidance, this as this has now delayed until spring 2021 we will progress based on the information available to develop a refreshed Procurement Strategy.	G	G		
Deliver our ambitious Digital Strategy by: • Launching a new bilingual 'chat bot' by September 2020; • Producing an agile working strategy for the Council by December 2020.	Cllr Chris Weaver	Resources	<p>The chatbot was initially launched February 2020, however to handle services changes resulting from lockdown restrictions, the chat platform was taken offline at the end of Quarter 4 2019-20 and relaunched in the first week of Quarter 1. During the first half of the year the chatbot has been continually revised and improved in relation to conversation scenarios and enquiry responses, in light of the many changes to operational services. Daily analysis of chat and enquiry types, and of conversations that could be completed due to misunderstanding by the chat logic, have enabled targeted improvements and revisions to be made.</p> <p>During Quarter 2, the team have successfully designed, developed and deployed the first new service (free waste bag ordering) without the support of Microsoft. This, along with a major upgrade affecting a number of elements of the chatbot architecture have been a successful test of knowledge transfer provided by the product suppliers.</p> <p>A proof of concept Alexa skill has been developed and</p>	G	G		

			<p>successfully demonstrated, this is now proceeding to more vigorous user testing and rework.</p> <p>The development of the Agile Working Strategy will be pushed back to later in the financial year, however, the operational principles of agile working are being developed due to the ongoing response to the Covid-19 pandemic.</p> <p>Work has progressed rapidly in relation to agile working during the first half of the year due to the Covid-19 pandemic. Approximately 500 new laptop and tablet type devices were procured to increase the number of mobile enabled users who can work from home or an alternate location. 5500 users were converted to use of Microsoft Teams instead of Skype in a matter of three weeks along with the conversion of approx. 500 PCs to allow usage from home via a user's home broadband.</p> <p>The volume of Direct Access remote access solution users increased by over 600% during the pandemic period when staff who were able to work predominantly from home.</p>				
<p>Establish Cardiff as a Smart City, where digital technologies and data are seamlessly used to enhance the lives of people, by adopting the new Smart City roadmap by September 2021.</p>	<p>Cllr Chris Weaver</p>	<p>Resources</p>	<p>The feedback from the stakeholder groups has been received and we are going to be finalising the smart city roadmap shortly. There has been a slight delay on completing the final version due to other work commitments. However, it will be finished at the beginning of quarter 3 - ready for approval.</p>	<p><b>G</b></p>	<p><b>A</b></p>		



**ATLANTIC WHARF MASTERPLAN**

**INVESTMENT & DEVELOPMENT (COUNCILLOR RUSSELL  
GOODWAY)**

**AGENDA ITEM: 11**

---

**Appendices 2 - 6 of this report are not for publication as they contain exempt information of the description contained in paragraphs 14 and 16 of part 4 and paragraph 21 of part 5 of Schedule 12A of the Local Government Act 1972.**

**Reason for this Report**

1. To seek Cabinet approval of the draft Atlantic Wharf masterplan relating to the regeneration of circa 25 acres of Council owned land in Cardiff Bay.
2. To seek authority to commence a public consultation process to engage local residents and businesses on the proposals.
3. Following completion of the consultation process, to seek authority to prepare of an outline planning application, to support delivery of the Indoor Arena project.

**Background**

4. The regeneration of Cardiff Bay is widely regarded as an exemplar urban transformation project. The area is now completely unrecognisable from the scarred landscape left behind by the demise of the coal and steel industries. The renewal strategy was spear-headed in the mid 1980s by the County Council's decision to locate its new headquarters building on reclaimed land adjacent to Bute West Dock.
5. In 1987, the Cardiff Bay Development Corporation was established by the UK Government to provide a dedicated regeneration focus over an area that made up almost one sixth of the total area of Cardiff. Over a period of 13 years, to March 2000, CBDC reclaimed around 200 acres of derelict land, and over £1.8 billion of private finance was invested. The Council also played a critical role in the regeneration process, retained all planning powers; a unique arrangement across the 11 Urban Development Corporations created at the time. The result was the creation of a mixed-use urban environment that is now home to many thousands of people and has

become established as Wales' leading urban visitor destination. Ambitious projects of international repute, such as the Cardiff Bay Barrage project, creating a 200 hectare impounded lake, the iconic Wales Millennium Centre and the Richard Rogers designed Senedd building have catalysed the regeneration of the area, particularly the 'Inner Harbour' area, which is now a vibrant mix of waterfront residential, offices and leisure/retail uses.

6. Whilst the transformation of Cardiff Bay is evident for all to see, there remains significant work to do to elevate the area into the top echelons of UK urban visitor destination capable of delivering a step-change to Cardiff's visitor numbers. Cardiff still lags significantly behind cities like Bristol and Liverpool both in terms of the number of visitors attracted from outside of the local area, and importantly in terms of GVA uplift generated off the back of the length of time visitors stay.
7. Cardiff Council remains committed to building on the momentum of previous investment and to '*writing the next chapter in the Cardiff Bay regeneration story*' as set out in the political administration's policy framework document Capital Ambition.
8. In April 2019, the Council launched its new Economic Strategy, endorsed by the city's business community following a public consultation process, setting out priorities and commitments for the future economic regeneration of the city. The plan sets out two key priorities:
  - i) **Metro Central** – the completion of a new office-led mixed use business district in the city centre anchored by the modernisation of Cardiff Central Station.
  - ii) **Atlantic Wharf** – delivery of the next phase of the Cardiff Bay regeneration story to establish Cardiff Bay as a premier UK visitor destination, anchored by a new Indoor Arena.
9. The Council's Corporate Plan also sets out the importance of continuing the regeneration of Cardiff Bay and highlights its role in helping to tackle poverty and improve equality and opportunity for the residents located in the city's 'Southern Arc'.
10. The Atlantic Wharf project is regarded by the Council as the primary catalyst for the next phase regeneration of Cardiff Bay. The site encompasses circa 25 acres of Council owned land including the existing County Hall site and the recently acquired Red Dragon Centre site, as well as land in the ownership of Welsh Government on Lloyd George Avenue and an area of privately owned land on Pierhead Street, as illustrated by the site plan at Appendix 1.
11. The plan seeks to deliver a major extension to Cardiff Bay's Inner Harbour area and is of similar scale in terms of square footage and investment value to the St David's 2 shopping centre development recently delivered in Cardiff city centre. The aim is to provide a long-term sustainable footing for the businesses that have already invested in the area, as well as providing the necessary footfall uplift to attract the next phase of new investment. It also

seeks to address the Council priority to *improve the link between the city-centre and Cardiff Bay* through redesigning parts of Lloyd George Avenue and by supporting the delivery of new public transport infrastructure and active travel links along the key Lloyd George Avenue route.

12. The Atlantic Wharf site is located in the Butetown ward of the 'Southern Arc'. The Southern Arc encapsulates around two fifths of the whole of Cardiff and consists of 11 wards in the south of the city. If considered as a discrete area in its own right, it would be by far the most deprived area in Wales, as defined by the Wales Index of Multiple Deprivation. The Butetown ward has for some time experienced poorer economic outcomes than the Cardiff and Welsh averages, and current claimant count data suggests that the unemployment rate for the area is 2.4 times higher than both the Welsh and UK average. The BTN01 Lower Super Output Area within the Butetown Ward is also amongst the most deprived in Wales according to the 2019 Wales Index of Multiple Deprivation and ranked in the worst 10% of performing areas in terms of both the Overall Index as well as the income, health, housing and physical environment domains. The new Indoor Arena is located on the boundary of BTN01, with some of the site in BTN01.
13. The proposed Atlantic Wharf regeneration project will provide a substantial number of new jobs, both during construction and thereafter, in close proximity to a number of Cardiff's most disadvantaged communities. Through engagement with developers, the Council will secure commitments to deliver local jobs and local training. Commitments have already secured in relation to the delivery of the new Indoor Arena project, which has now entered the Preferred Bidder stage following a decision by Cabinet on 26<sup>th</sup> November 2020.
14. The new Indoor Arena project is regarded as the anchor project of the Atlantic Wharf regeneration. In February 2018, Cabinet authorised the selection of Atlantic Wharf as the preferred location for the new Indoor Arena. In February 2019, as part of the budget setting process, Cabinet approved an affordability envelope in the Council's Medium Term Financial Plan to support delivery of the new Indoor Arena including financial provision for the acquisition of the Red Dragon Centre site. In July 2019, Cabinet gave authority to begin a procurement process to secure a developer/operator consortium to deliver an Indoor Arena at Atlantic Wharf, Cardiff Bay with a minimum capacity of 15,000.
15. In December 2019, Cabinet approved the acquisition of the Red Dragon Centre investment and other land.
16. The procurement process for the new Indoor Arena has moved forward significantly over recent months and the Council now has a private sector offer that meets the city's aspirations. In November, Cabinet approved appointment of a preferred bidder and is now in the processes of completing a Full Business Case ahead of final contractual commitment and the submission of a planning application in the summer of 2021.
17. The Indoor Arena project is regarded as an anchor project in the Atlantic Wharf scheme for a number of key reasons. It will provide a step-change in

the number of visitors to the area, with over 1 million people attracted to circa 140 events at the venue each year. This is fundamental in attracting investment in new leisure related businesses, including hospitality businesses, as well as helping to sustain the existing investments in the Inner Harbour area.

18. The level of footfall increase delivered by the new arena is anticipated to attract complementary investment that will further grow the footfall attracted to the area. This will help to support and sustain new public transport services, including the proposed Cardiff Metro tram-train link from the city centre to the Bay. It should also create the customer patronage required to boost fare-box takings and underpin proposals to extend the Cardiff Metro by linking to the City Line in the west and to the proposed new St Mellons Parkway station in the East.

## Issues

19. In order to support delivery of the new Indoor Arena, the Council is required to bring forward a plan for the transformation of the area that will surround the new Arena, both in terms of supporting access to and from the new venue, but also to provide a strong commercial context for the property investment required for the new Arena.
20. The Council selected Atlantic Wharf as the preferred location in February 2018. This was followed by detailed feasibility work to identify the optimum location within Atlantic Wharf for the location of the new Indoor Arena. The existing County Hall car park site was chosen for a number of reasons:
  - It represents the least cost option following detailed financial appraisal including impact on services and infrastructure.
  - It allows the development to progress unencumbered by the need to demolish and relocate any other building before progressing.
  - It provides the opportunity for a very strong physical connection back to the Oval Basin and the Cardiff Bay Waterfront.
  - It provides the opportunity to disperse crowds to minimise impact on surrounding communities post event by requiring a short walk by visitors to proposed new transport nodes.
  - It minimises impact on key road infrastructure required to provide an alternative route to allow for management of the Butetown Tunnel.
21. In addition to the location of the new Arena, there are a number of considerations that need to be taken into account in establishing a redevelopment framework:
  - Whilst the Council is committed to modernising its operational estate and to consolidating into '*fewer but better buildings*' it is yet to decide whether to refurbish County Hall to make it fit for purpose for the long-term or to relocate into a new purpose built building. As such, the masterplan framework needs to provide for the continued operation of the existing County Hall building whilst also identifying opportunities for alternative arrangements.

- The retention of existing tenants in the Red Dragon Centre (RDC), both in terms of the successful operation of existing businesses during the redevelopment phases around the RDC and the need for any replacement RDC to be built before the existing building can be demolished to allow tenants an uninterrupted transition.
  - The consolidation of existing low value surface car parking into a multi-storey car park (MSCP) to free up land for development/the provision of new public open space.
  - Opportunities to attract more people to live and work in the area to create a vibrant new urban centre that has life and activity 7 days a week.
  - Opportunities for major environmental improvements including upgraded public realm, new areas of public open space, and the introduction of green spaces and trees.
22. A key aim of the new masterplan is to create a seamless extension to the Inner Harbour area to create a larger attraction that improves Cardiff Bay's long-term viability and its status as a UK visitor destination.
23. Based on the above, an initial phase of work has been undertaken to establish a draft masterplan as the basis for undertaking a process of engagement with the local community, the residents of Cardiff more widely, and the business community of Cardiff.

#### Development Zones

24. The masterplan will act as an investment prospectus that will promote opportunities to the private sector in support of the Council's vision. A public-private partnership approach will continue to be the Council preferred way of delivering the development.
25. In addition to the Council owned County Hall site and Red Dragon Centre site, the masterplan boundary also includes land privately owned on Pierhead Street, and land owned by Welsh Government along the length of and adjacent to Lloyd George Avenue as illustrated by the plan attached at Appendix 1.
26. Confidential Appendix 2 illustrates a number of development zones identified around key anchor developments as follows:
- **Indoor Arena** - a new 15,000 capacity Indoor Arena hosting circa 130 events each year, including the relocation of the existing Travelodge Hotel provide a new, extended 176 Bedroom hotel.
  - **New RDC** - the redevelopment of the Red Dragon Centre to deliver:
    - a new Leisure Offer (re-locating Hollywood Bowl, Gym, Casino etc)
    - a new Odeon LUX
    - a new A3 Food & Beverage offer
    - 150 Residential Units (PRS)
    - A 'This is Wales' Virtual Reality Fly-through attraction

- **Cultural Quarter** - the creation of a new cultural quarter adjacent to the Wales Millennium Centre including a proposed new Production Studio and a major new cultural attraction subject to the identification of funding.
- **Commercial Quarter** – a new 150,000 sq ft headquarter office building fronting the event square and a new 150 bed, 4 star plus, 14 storeys hotel.
- **Residential Quarter A** – in the event that the Council decides to relocate out of the existing County Hall building, the proposal is to provide a residential-led, waterfront, mixed-use development with active ground floors to include retail, food & beverage and potentially office uses delivering around 600+ new homes in a mixed complex of apartment blocks of circa 10 storeys in height.
- **Residential Quarter B** – fronting Lloyd George Avenue (to the west) and the new event square (to the east) a residential-led development with the opportunity for vertically integrated mixed-uses including offices, hotels and residential with the potential to deliver 400+ new homes. This area of the plan has the potential to deliver some height.
- **Event Square** - a major new event square and family attraction (of circa 10,000m<sup>2</sup> - bigger than a full size sports playing pitch).
- **Car Parking** – consolidation of existing parking into an MSCP delivered in 2 phases.
- **Transport Hub** – to provide a main terminus and interchange for new tram-train services and bus services to Cardiff Bay to be based on the Pierhead Street site as part of a mixed-use development. The proposal includes a new pedestrian bridge across the A4232 to provide direct access from the main event square to the Transport Hub.
- **Lloyd George Avenue** - re-design of the existing dual carriageway highway to reduce the road capacity to a single-lane in each direction to provide space for an extended landscaped walkway promenade connecting the city centre to the Bay and opening up the opportunity for limited development at key intersections along the route. This zone includes proposals for the re-alignment of the flourish area to reduce traffic and enhance the pedestrian connectivity between the Inner Harbour and Atlantic Wharf.

### Place Making

27. A central theme of the masterplan is to create a new destination place in Cardiff Bay by significantly extending the Inner Harbour with additional attractions, spaces and cultural assets.
28. Whilst the plan seeks to create a place that is welcoming and attractive to visitors, it is very much designed to become an extension of the local community, with over 1150 mixed tenure new homes planned. The aim is to

establish a vibrant urban environment that is active all year round, including weekends and in the evening.

29. Investment in high quality public spaces is critical if the plan is to deliver the aspiration of extending the Cardiff Bay visitor destination. Confidential Appendix 2 outlines the proposal for a major new formal event square. The event square is complemented by a series of informal spaces around its edge, which provide the opportunity for significant greening, including the planting of new trees. An initial review, subject to detailed design, suggest potential for a net increase of circa 300 trees. It is also intended to provide a free to use children's play attraction in the event space, which will be complimentary to the space being used to host events from time to time.
30. Enhancing the relationship between the Atlantic Wharf site and the Cardiff Bay waterfront is a central design feature. The orientation of public realm corridors and buildings attempts to make the most of the connection back to the waterfront, to provide views from development, and also a strong pedestrian connection to re-inforce the intension that the Atlantic Wharf site becomes an extension of the Inner Harbour area.

#### Mixed Use Development

31. The redevelopment of the Atlantic Wharf site aims to deliver a leisure-led mixed-use development to enhance Cardiff Bay's credentials as a visitor destination. This will potentially involve the full range of mixed uses including residential, offices, retail, leisure etc, but will seek to place key leisure infrastructure in the focal areas of the plan.
32. The mixed-use approach may also emerge vertically (i.e. within a building) as well as horizontally (i.e. across a site). Recent development in cities such as London and Manchester have seen individual buildings include retail/leisure activities on the ground floor; a number of floors of office development; with residential/hotel above. This type of 'city centre' urban development allows vibrancy and activity at the ground level with residential buffered from noise/intrusion either by double/triple height ceiling levels on the ground floor or a number of stories of offices which elevate the residential to a level where intrusion is minimised. The St David's 2 development is an example of the former; however, more and more vertically integrated developments including offices as a buffer are being delivered in areas of busy footfall.
33. The principle of active frontages is designed into the draft plan throughout.

#### Phasing Plan

34. The Atlantic Wharf masterplan is intended to be a flexible document that can adapt to market interest and investment opportunities as they arise. It is anticipated that the plan will take at least 7 years to implement depending on market conditions over that period.

35. Confidential Appendix 2 sets out a phasing plan developed around the key building blocks outlined in paragraph 26 above; some of these phases could potentially be delivered concurrently.
36. **Phase One:** Delivery of the new Indoor Arena is regarded as the key anchor project and the first phase of the plan. The Council's commitment to the Arena project will help to create confidence in the private sector to engage in the subsequent phases. The Arena will also deliver a significant increase in footfall in the area that will bolster the investment case for uses such as retail/leisure/culture etc. The new Indoor Arena project requires the relocation of the existing Travelodge Hotel, and the consolidation of surface car parking into a multi-storey car park (MSCP) and therefore both of these developments are considered part of the first phase.
37. **Phase Two:** Transformation of the Red Dragon Centre into a new purpose built development with modern upgraded facilities and including circa 150 units of PRS residential above. This phase requires the new MSCP to be completed before it can commence to ensure leases with existing tenants can be maintained and smoothly transitioned (see Confidential Appendix 3).
38. **Phase Three:** Delivery of a new head quarter office building and 4 star hotel fronting the event square. The hotel development will need to commence after completion of the Arena as its proposed location is allocated as the site office during the Arena construction period. The delivery of offices will be subject to end user demand and can only be brought forward after the MSCP is delivered.
39. **Phase Four:** The proposed residential fronting Lloyd George Avenue and on the site of the current County Hall should it become available for development are considered latter phase development subject to completion of the earlier phases and a decision on the future of County Hall.
40. **Transport Hub:** The proposed Transport Hub is located on a separate site to the rest of the Atlantic Wharf development and could potentially come forward at any point in the development cycle following a commitment to funding.
41. **Cultural Quarter:** The land allocated to the delivery of the Cultural Quarter will be available following the completion of Phase Two, with timing dependent on the availability of funding for the component parts.

#### Transportation Strategy

42. The transport strategy for the Atlantic Wharf masterplan will be public transport-led. This is a critical aspect of ensuring the development demonstrates a strong contribution towards the administration's commitment to the climate emergency.
43. The choice of Atlantic Wharf as the preferred location for the new Indoor Arena was cognisant of the need to improve public transport connectivity to Cardiff Bay. The anticipated 1m plus visitors to the Arena each year should significantly improve the business case for investment in public transport

infrastructure. This includes the potential to extend the committed Cardiff Metro investment linking Queen Street Station to the Bay to create a cross-rail service linking westwards to Central Station and the City Line and eastwards to the proposed new Cardiff Parkway station at St Mellons.

44. The masterplan proposes the creation of a new hub station for the Bay on Pierhead Street providing an interchange for tram-train services and bus services as well as facilities for taxi's and coaches. As yet, the funding for this proposal is not secured, however it is anticipated to be delivered through a combination of public and private investment.
45. The plan also understands that Arena development will require an element of car based journeys. To that end the plan proposes to provide a new MSCP on the site. However, given the administration's commitment to the climate emergency, and the desire to deliver a public transport led development, car parking will be limited to the existing level of spaces available across the Atlantic Wharf site. All other car journeys would be expected to utilise city centre car parks with the last mile of journeys either involving public transport or active travel.
46. Active travel will also form a key part of the strategy. The plan includes proposals to remodel Lloyd George Avenue by reducing the road infrastructure from a dual carriageway to a single lane in each direction to free up space to create a much-improved landscaped boulevard corridor linking the city centre to Cardiff Bay. This proposal also explores the potential to improve east-west connectivity by establishing new focal points at intervals along the length of the road to open up access between existing communities either side of the existing railway line and wall, and to provide visitors to the area with facilities and points of interest to break up the journey. The active travel plan will also be supported by a proposed extension to the existing cycle superhighway plans along Lloyd George Avenue to connect into the proposed new transport hub on Pierhead Street and beyond through Porth Teigr towards the barrage.

#### Sustainability Strategy

47. On 28 March 2019, Cardiff Council approved a motion to declare a climate emergency. The Welsh Government also declared a climate emergency on 29 April 2019, the day after the Scottish Government and followed by the UK Government on 1 May. Over 70 Councils in the UK have now declared a climate emergency with the majority including targets to be achieved by 2030. As part of this, the Council has agreed to support the implementation of the Welsh Government's Low Carbon Delivery Plan, which aims to secure a carbon neutral public sector in Wales by 2030. This includes the commitment for the Council to progress a wide range of projects in support of the existing Carbon Reduction Strategy and to further reduce carbon emissions from the Council's operations.
48. The Atlantic Wharf masterplan aims to deliver a Net Carbon Zero development across the whole of the site based on delivering energy efficient buildings with supply of energy from renewable sources. The Council is mindful that this ambition does not only relate to the operational

phase of development, i.e. it also includes the construction phase, which can account for more than half of all carbon emissions. Net Carbon Zero therefore needs to take account of embodied emissions from materials sourcing and construction, as well as maintenance, replacement and eventual demolition.

49. At this same meeting, Cabinet is also considering a report to approve the Full Business Case for the Cardiff Heat Network. This follows approval by Cabinet on the 19th April 2018 of the Outline Business Case which is mostly based on the supply of heat from the Trident Park Energy Recovery Facility (ERF). As part of the development of the Full Business Case, grant funding of £6.628m for Phase 1 has been obtained from the Department of Business, Energy and Industrial Strategy's Heat Network Investment Project. As part of the application for HNIP Capital funding, the Council committed to ensuring the proposed new indoor Arena is connected to the heat network and this will also be connected to Phase 1. The Arena makes a significant contribution towards the overall financial viability of the scheme.
50. The Council is also seeking to learn from exemplar schemes across Europe such as the battery storage scheme at the Amsterdam Arena, which seeks to provide the venue with an element of energy independence. Proposals for a green parking solution are also being considered.
51. A detailed sustainability strategy will be submitted as part of the planning application process.

#### Land Assembly

52. The Council is now in control of the vast majority of land required to deliver the regeneration of Atlantic Wharf. There are a number of minor residual land interest that need to be acquired and two significant land interests: one to assist with the delivery of the Arena; and one to enable delivery of a new MSCP in the location identified by the draft masterplan.
53. As part of the November Cabinet decision to appoint a 'Preferred Bidder' for the Arena development, Cabinet agreed to delegate authority to specified officers in consultation with relevant Cabinet Members to conclude the land assembly strategy.

#### Development Appraisal

54. The Development Appraisal attached at Confidential Appendix 5 illustrates that the proposed masterplan is a commercial viable proposition. However, each element of the plan will need to be tested in more detail through a detailed business planning process, in particular:
  - The new Indoor Arena
  - The future of County Hall
  - Red Dragon Investment

- Each Cultural Quarter Asset

The Cardiff Metro and the Cardiff Heat Network projects will also be subject to the business planning process.

### County Hall

55. The draft masterplan addresses the potential of the current County Hall site and identifies a potential location for a new County Hall development. It is however important to stress that the Council is yet to decide its long-term strategy for its core office accommodation. The current plan remains to consolidate into the fewest possible buildings with staff relocating into the existing County Hall building.
56. The Council was preparing to undertake a Detailed Business Case to determine the preferred approach to its core office estate. However, the onset of the COVID-19 pandemic has led to a pause in this work to provide sufficient time to understand the impacts of the changes to working patterns and service delivery that have taken place and to determine the extent to which these changes will be retained as the norm in the future. This could inevitably affect the Council's long-term requirement for office accommodation and therefore it is anticipated that the Detailed Business Case will not commence until the pandemic has been fully managed.
57. Nonetheless the draft masterplan explores the potential of the whole site including the redevelopment of the existing County Hall site should a decision subsequently be taken to relocate. The plan also provides an option for the existing building being retained, however this is explored in less detail as this option would have less of an impact on the overall masterplan.

### Financial Approach

58. The Council has established a financial envelop to assist with delivery of the new Indoor Arena and the broader Atlantic Wharf masterplan. The Council has already invested significant resources in land assembly and will be seeking to recover this investment through the redevelopment process. An overview of the financial approach is attached in the Financial Report at Confidential Appendix 6
59. A number of the proposed developments have the potential for Council involvement. The Council will need to consider the extent of its involvement which can range from: simply disposing of land to facilitate development; or building out a development and then disposing of the development, taking on developers risk in return for a greater receipt; or build out a development and keep the asset as an investment to generate long-term income.
60. For each project, the Council will need to balance risk and reward. Each opportunity will be considered through a detailed business case process, with approval required from Cabinet before proceeding.

### Next Steps

61. The masterplan attached at Confidential Appendix 2 is a draft proposal designed to enable consultation and engagement with local communities, businesses and stakeholders, in advance of the pre-planning application process that will commence in the summer of 2021. The intention is to prepare a hybrid planning application to secure outline permission for the masterplan at the same as securing detailed permission for the new Indoor Arena development.
62. The Council has now appointed a preferred bidder for the Arena development and will seek to progress the consultation process on the draft masterplan at the same time as engaging with local communities, businesses and stakeholders on the Indoor Arena development.
63. The report to Cabinet on the Arena development in November also secured authority to undertake an Outline Business Case to determine the preferred approach for delivery of a new Multi-Storey Car Park (MSCP).
64. Once the draft masterplan has been agreed, work will then need to progress on the development of an OBC to determine the preferred approach for delivery of the proposed redevelopment of the Red Dragon Centre (RDC).
65. The OBC for the proposed new MSCP and the OBC for the redevelopment of the Red Dragon Centre will both need to be presented back to Cabinet for authority to proceed to the Full Business Case stage to determine final designs and costs.

### **Local Member consultation (where appropriate)**

66. Local Members are aware of the proposals and will be consulted as part of the planning process.

### **Reason for Recommendations**

67. To seek approval of the draft Atlantic Wharf masterplan and authority to undertake a consultation process before commencing the preparation of a planning application.

### **Financial Implications**

68. This report is seeking Cabinet approval of the draft Atlantic Wharf masterplan and contains a wide range of proposals, including the proposed redevelopment of circa 25 acres of Council owned land in Cardiff Bay. Whilst approval in principal is being sought at this stage for the overall masterplan, the report sets out that this will be a business case led approach with more detailed individual scheme proposals to be brought to Cabinet for approval in due course. More detailed financial implications will be provided as and when these detailed proposals are brought forward with clear funding strategies identified to implement these proposals.

69. As set out within the report, the new Indoor Arena is intended to be the anchor project for this regeneration scheme, with several component parts of the proposed masterplan being intrinsically linked to delivery of the Arena. It is anticipated that the Arena Affordability Envelope, as agreed by Council in February 2019, will be utilised as the funding source for the early stages of this scheme. In the long-term, the overall scheme should be sustainable and self-financing in its own right by utilising capital receipts, s106 contributions, and new revenue streams generated.
70. This self-financing view is supported by the independent development appraisal attached as **Confidential Appendix 5** which concludes that *"a baseline financial position has shown the scheme could be self-financing if delivered by the Council. Given the wider regeneration impact investment the site could have, a benefits case for the scheme has the potential to be value for money at the city-wide level."*
71. The development appraisal, and in particular peak cashflow requirements, will need to be continually reviewed as the appraisal develops, with the phasing and delivery structure to be further optimised at the next stage to ensure peak cashflow and debt requirements remain within Council budgets. Further consideration to these points will be required at the next business case stage of the process ahead of more specific Cabinet approvals
72. This report also seeks authority to prepare a planning application for the masterplan to be submitted as part of a hybrid planning application with the new Indoor Arena, as well as preparation of an Outline Business Case (OBC) for redevelopment of the Red Dragon Centre (RDC). **Confidential Appendix 6** sets out the proposed budgets required to achieve this. It is proposed that these budgets will be initially funded via the Arena Affordability Envelope.
73. Any future disposal of Council land must be supported by an independent site valuation to demonstrate value for money. Similarly, each component part of the masterplan must also demonstrate value for money within a business case before it can be brought forward for approval.

#### **Legal Implications (including Equality Impact Assessment where appropriate)**

74. The Council has an obligation to ensure value for money in its management, acquisition and disposal of land and property as public assets. It is anticipated that additional detailed reports will be required upon specific transactions linked to the masterplan specific legal advice will be provided
75. The decision about these recommendations has to be made in the context of the Council's public sector equality duties. The Council also has to satisfy its public sector duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The Protected characteristics are: age, gender reassignment, sex, race – including ethnic

or national origin, colour or nationality, disability, pregnancy and maternity, marriage and civil partnership, sexual orientation, religion or belief – including lack of belief. If the recommendations in the report are accepted and when any alternative options are considered, the Council will have to consider further the equalities implication and an Equality Impact Assessment may need to be completed.

76. The Well-Being of Future Generations (Wales) Act 2015 ('the Act') places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible.

In discharging its duties under the Act, the Council has set and published well being objectives designed to maximise its contribution to achieving the national well being goals. The well being objectives are set out in Cardiff's Corporate Plan 2018-21: <http://cmsprd.cardiff.gov.uk/ENG/Your-Council/Strategies-plans-and-policies/Corporate-Plan/Documents/Corporate%20Plan%202018-21.pdf> When exercising its functions, the Council is required to take all reasonable steps to meet its well being objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the well being objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.

The well being duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:

- Look to the long term
- Focus on prevention by understanding the root causes of problems
- Deliver an integrated approach to achieving the 7 national well-being goals
- Work in collaboration with others to find shared sustainable solutions
- Involve people from all sections of the community in the decisions which affect them

The decision maker must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible using the link below: <http://gov.wales/topics/people-and-communities/people/future-generations-act/statutory-guidance/?lang=en>

77. The Council has to be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards when making any policy decisions and consider the impact upon the Welsh language, the report and Equality Impact Assessment deals with all these obligations. The Council has to consider the Well-being of Future Generations (Wales) Act 2015 and how this strategy may improve the social, economic, environmental and cultural well-being of Wales.

## RECOMMENDATIONS

Cabinet is recommend to:

- 1) Approve in principle the masterplan set out at Confidential Appendix 2 for the re-development of Atlantic Wharf site illustrated by the site plan at Appendix 1 and to authorise the commencement of a consultation process.
- 2) Authorise the preparation of a planning application to secure outline planning permission for the masterplan to be submitted as part of a hybrid planning application with the detailed application for the new Indoor Arena.
- 3) Authorise the preparation of an Outline Business Case to consider options for bringing forward the redevelopment of the Red Dragon Centre.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Neil Hanratty</b> Director of Economic Development

*The following appendices are attached:*

Appendix 1 - Site Plan

Confidential Appendix 2 - Masterplan Report

Confidential Appendix 3 - RDC Tenant Report

Confidential Appendix 4 - Cardiff Bay Transport Strategy

Confidential Appendix 5 - Development Appraisal

Confidential Appendix 6 - Financial Report

This page is intentionally left blank

Notes:

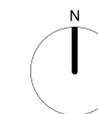
© Rio Architects Ltd.

This drawing is copyright and must not be reproduced or disclosed to third parties without the prior written consent of Rio Architects Ltd.

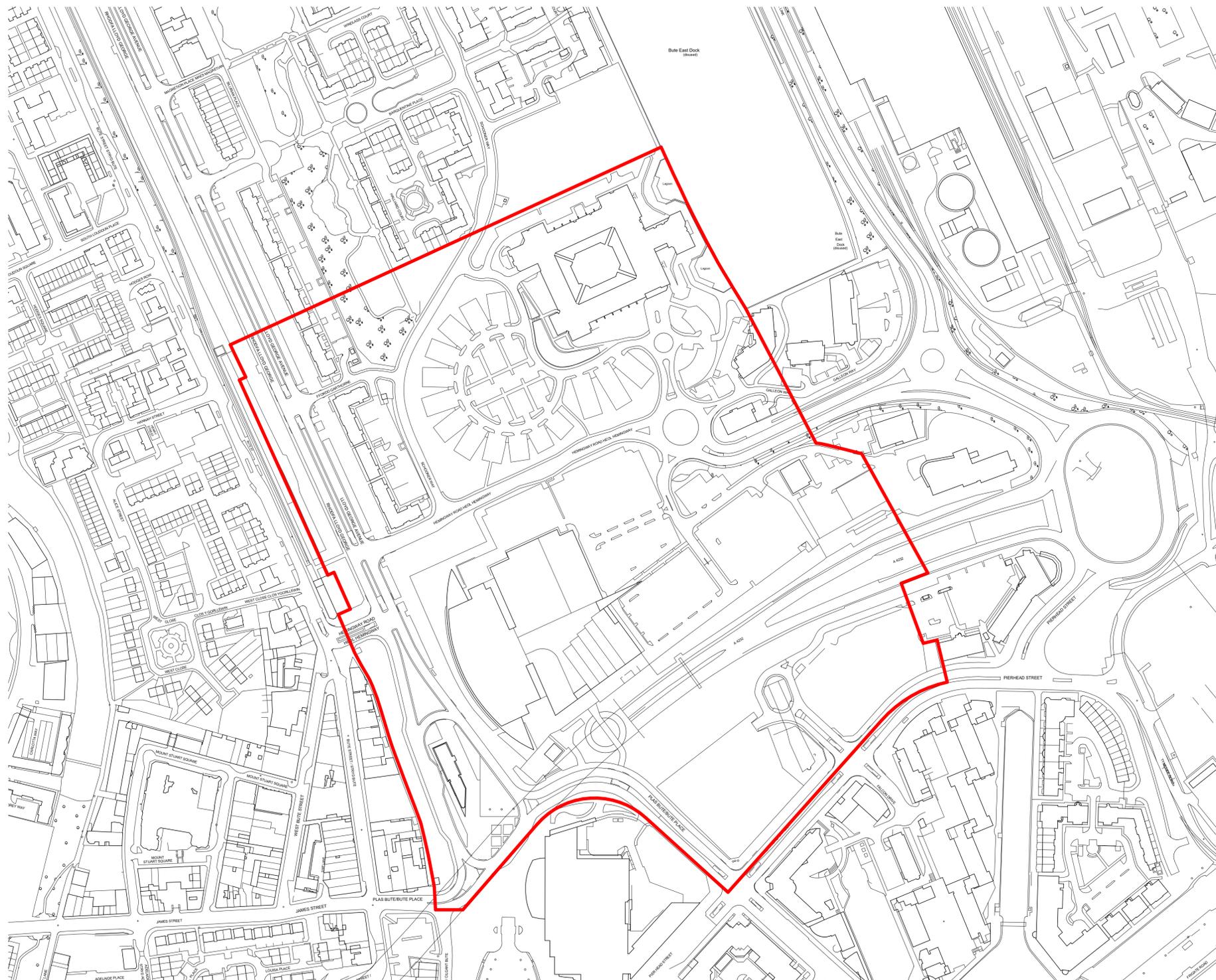
Do not scale this drawing. Responsibility is not accepted by Rio Architects Ltd for errors made by others during the printing or scaling of this drawing. Use only written dimensions. It is the contractor's responsibility to verify all dimensions before commencing any work. Any discrepancies are to be notified in writing to Rio Architects Ltd immediately.

This drawing is to be read in conjunction with all other relevant project drawings, specifications and schedules prepared by Rio Architects Ltd and any other relevant consultants, specialists or subcontractors.

CDM notes are provided to assist the contractor in managing residual hazards identified during the design stage. Any such notes do not relieve the contractor of their duties under all relevant CDM Regulations.



**CONFIDENTIAL**



Rev	Description	Rev'd	Chk'd	Date
2	General update	PJ	DL	07/09/20
1	First issue	PJ	DL	23/04/20

**FOR INFORMATION**

**SUITABILITY NUMBER KEY:**  
 WIP - Work in Progress\*  
 SHARED  
 S1 - Fit for co-ordination\*\*  
 S2 - Fit for information  
 S3 - Fit for internal review and comment  
 S4 - Fit for construction approval  
**DOCUMENTATION**  
 D1 - Fit for costing  
 D2 - Fit for tender  
 D3 - Fit for contractor design  
 D4 - Fit for manufacture/procurement

**DOCUMENTATION - SIGN-OFF**  
 A - Fit for construction  
 B - Fit for construction, with comments  
**ARCHIVE**  
 AB - As Built  
 FC - Final Construction  
 \* For internal pre-issue usage only.  
 \*\* For model file usage only.



studio@rioarchitects.com  
 www.rioarchitects.com  
 @rioarchitects

**Rio Cardiff**  
 21a Allensbank Road  
 Cardiff CF14 3PN  
 +44 (0)29 2025 0066

**Rio London**  
 19 21 Hatton Garden  
 London EC1N 8BA  
 +44 (0)20 2691 7565



City of Cardiff Council

**PROJECT TITLE:**  
 Atlantic Wharf Development  
 Cardiff

**DRAWING TITLE:**  
 Existing Site Plan With Red Line Boundary

**DRAWN BY:** PJ    **CHECKED BY:** DL    **APPROVED BY:** RR  
**JOB NO:** 0371    **SCALE:** 1 : 2000 @ A1

<b>SUITABILITY:</b>		S2	
<b>DATE:</b>	23/04/20	<b>REVISION:</b>	2
<b>PROJECT</b>	0371	<b>ORIGIN</b>	RIO
<b>VOLUME</b>	XX	<b>LEVEL</b>	XX
<b>TYPE</b>	DR	<b>DISCIP.</b>	A
<b>NUMBER</b>	90000		

This page is intentionally left blank

By virtue of paragraph(s) 14, 16, 21 of Part(s) 4 and 5 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 14, 16, 21 of Part(s) 4 and 5 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 14, 16, 21 of Part(s) 4 and 5 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 14, 16, 21 of Part(s) 4 and 5 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 14, 16, 21 of Part(s) 4 and 5 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

**CABINET MEETING: 17 DECEMBER 2020**

---

**ANNUAL PROPERTY PLAN****INVESTMENT & DEVELOPMENT  
(COUNCILLOR RUSSELL GOODWAY)****AGENDA ITEM:12**

---

**Reason for this Report**

1. To seek Cabinet approval of the 2020/21 Annual Property Plan (APP).

**Background**

2. Since 2015, the Council has adopted a five year Corporate Property Strategy (2015-2020) which set out a framework within which all Council property related issues needed to be addressed. The Strategy, entitled "*Fewer but Better Buildings*", established a series of targets over the five year period designed to deliver the core objectives of modernisation, rationalisation and collaboration.
3. The Annual Property Plan (APP) is the implementation plan for the Strategy published annually (see Appendix 1). The targets set out within the APP make a contribution towards the five year targets set out within the Corporate Property Strategy and includes objectives for the operational estate. The APP provides an update on priority projects, reinforces overarching principles for the strategy of the estate, outlines what is planned for the year ahead, and provides explicit targets relating to the reduction in the size and cost of the estate.
4. A new Corporate Property Strategy was originally scheduled to be published in the spring of 2020 to provide an updated framework to run from 2020 to 2025. However, the COVID-19 pandemic has led to a pause in the publication date to allow time to reflect on the property related impacts given the substantial changes to working patterns. At present, it is anticipated that the new Strategy will be published in the autumn of 2021 at the earliest. It is important that preparatory work is now undertaken to understand the impact of COVID-19 on the Council's business and property requirements. This will include the provision of suitable support for staff to ensure effective continuity of service. The new strategy will likely need to include an increased degree of flexibility to allow the Council to adapt to changing requirements, COVID-19 measures and business needs over the coming months and years. The new property strategy will establish revised long-term targets to measure asset management performance aligned with the Council's budget and

corporate objectives. It will also be broadened in scope to include commentary on Major Projects, the Investment Estate, Housing and SOP.

5. As a consequence, this Annual Property Plan (2020/21) will be a standalone document designed outside of a wider Corporate Strategy and will only report on forecast and completed property transactions for the financial year 2020/21. This approach may continue into 201/22 depending on the on-going implications of the pandemic.
6. The Council's estate is large and diverse and represents the second largest call on the Council's budget after staff costs. The ongoing changes to the way in which the Council delivers its services is inextricably linked to its operational property estate and therefore offers an on-going opportunity for review.

## Issues

7. By the 1<sup>st</sup> April 2020, the significant impact of COVID 19 on the property estate and Council working practices was already being felt. As the first national lockdown commenced on 23<sup>rd</sup> March 2020, a rapid adjustment to home working was successfully implemented and continues to effect many facets of how the Council runs and operates its estate. In terms of the APP, the business disruption in March inevitably saw some transactions which would have ordinarily been completed at the end of last financial year roll over into the 2020/21 financial year and this is reflected in this Annual Property Programme. This year's Plan also reflects certain transactions, including leases, acquisitions and disposals which have been subject to renegotiation due to the market disruption. County Estates continues to work closely with the Council's tenant and occupier base to mitigate the ongoing financial impact. The results of the the 2019/20 APP are shown in Appendix 1.
8. Land and Property management is a key strategic activity which aligns service strategies with the property estate. It ensures optimisation of property assets in a way which best supports the organisation's business goals and objectives. The requirement for effective land and property management is based on treating property as a corporate resource which forms the basis of the associated Corporate Landlord programme. The importance of a corporate approach relates to the significant costs of operating the estate and the limited resources available to address the on-going pressures to maintain and modernise the estate.
9. The Corporate Landlord model presented to Cabinet in 2018 aligns with the objectives of the Corporate Property Strategy and Annual Property Plan. It also covers the wider issues relating to the management of the estate including maintenance and statutory compliance. The targets set out in the APP relate to strategic management of the estate and include:
  - reducing the maintenance backlog,
  - reducing running costs,
  - creating a more efficient estate,
  - generating capital receipts.

## Property Disposals

10. The Council's disposals programme for 2020/21 is as follows:

<b>APP PROPERTY DISPOSALS</b>		
<b>Property</b>	<b>Status</b>	<b>Action</b>
Former Llanrumney Play Centre & Land	Ongoing	Sell
Former Michaelston College	Ongoing	Appropriation to Housing
St Mellons Housing site	Ongoing	Sell
Former Rumney High land	Ongoing	Appropriation to Housing
Harvey Street Car Park (part)	Ongoing	Appropriation to Housing
Trowbridge Children's Home	Ongoing	Sell
Western Control Centre (Bunker)	Ongoing	Sell

**Table 1. Annual Property Plan 2020/21  
Operational property disposals programme**

<b>APP LAND DISPOSALS</b>		
<b>Property</b>	<b>Status</b>	<b>Action</b>
Land at 200 Fairwater Rd	COMPLETE	SOLD
Land at the Beacon Centre	COMPLETE	SOLD (exchange pending)
Land at Brindley Road (Cardiff Marina)	Ongoing	Sell
Land adjacent to Brachdy Lane	Ongoing	Sell
Land at Caer Wenault / Pantmawr Rd	Ongoing	Sell
Land at Beaumaris Road	Ongoing	Appropriation to Housing
Land at Flaxland Avenue	Ongoing	Discussing potential acquisition with local community group

**Table 2. Annual Property Plan 2020/21  
Land disposals programme**

11. The Council's 2019/20 Budget Statement included a requirement to generate over £40 million of additional capital receipts over the period 2018/19 – 2022/23 to support delivery of the Band B schools programme and the agreed capital programme. To date the Council has secured £7.9m towards this goal, with a further £4m pipelined to be completed during this financial year. The overall programme is set out in the APP attached at Appendix 1.
12. A review has been undertaken of all of the Council's land holdings to identify potential opportunities for disposal. All of the opportunities identified to date require further detailed consideration and due diligence, including discussions with local Members. It is proposed to work up detailed proposals for each opportunity and on a case by case basis bring forward a report for Cabinet to consider.

### Non-Operational Estate

13. The 2018/19 APP, committed County Estates to undertake a review of the non-operational estate to gain a better understanding of the assets within the portfolio and their performance. A detailed review of each asset has now been completed and a number of key themes have emerged:

- Backlog maintenance with no allocated budget to address
- Health & Safety compliance concerns
- Reactive estate management
- Inconsistent tenure arrangements in particular within retail parades
- Status, strength and presence of tenants

The new Corporate Property Strategy will set out a strategy for this part of the Council's estate addressing the key management issues for future. Each asset will be categorised as to Retain, Remodel or Release.

14. The Non-Operational programme for 2020/21 is as follows:

<b>APP NON OPERATIONAL DISPOSALS</b>		
<i>Property</i>	<i>Status</i>	<i>Action</i>
Former Trelai Bowls Pavilion	COMPLETED	Leased to Ely & Caerau Sports Trust
Land at Railway Street	COMPLETED	Leased to Green Squirrel
Former Fairwater Social Club	Ongoing	Appropriate to Housing
Paddlesteamer	Ongoing	Sale of residual freehold interest
Lydstep Changing Rooms	COMPLETED	Leased to Cardiff Draconians FC
Canal Park land	Ongoing	Lease to CAVC
Stacey Road caretakers (Flying Start)	Ongoing	Lease to Little Angels
Selected Tennis Courts (Hailey Park and Victoria Park)	Ongoing	Lease to Tennis Wales
Llandaff CIW Primary caretakers house	Ongoing	Lease

**Table 3. Annual Property Plan 2020/21  
Non-Operational programme**

### Retail Parades

15. The 2019/20 APP set out the findings of the review of the Council's retail parades. There are 21 distributed across the city of varying type, quality, condition and with different tenancy arrangements in place. Most of the parades were identified as in a poor condition with a significant maintenance backlog and as being management intensive. It was agreed that given the limited capital to re-invest in these assets they represent a liability to the Council and have an ongoing overall detrimental effect on the quality and value of the Council's estate.

16. As such, in 2019/20 it was proposed to dispose of 14 of the parades which are in the most need of investment (listed in table 2 below) over the next two years. Two Parades were disposed in 2019/20. In advance of bringing each parade to the market it is proposed to undertake a detailed review of the asset to regularise any lease matters, and where appropriate to terminate leases and/or renew or extend leases to ensure each parade is in the best commercial position to maximise the capital receipt.

<b>APP RETAIL PARADE DISPOSALS</b>		
<b>Property</b>	<b>Status</b>	<b>Action</b>
56a & 56b shops at Plasmawr Road	COMPLETED	Sold
Llangranog Road - Premium payment 1	COMPLETED	Payment received
Llangranog Road - Premium payment 2	COMPLETED	Payment received
Fishguard Road	Ongoing	Sell
Bishopston Road	COMPLETED	Sold
Llangranog Road	Ongoing	Sell

**Table 4. Annual Property Plan 2020/21  
Retail Parades programme**

#### Investment Estate

17. As described in the 2019/20 APP, the Council manages a portfolio of investment properties let on commercial terms to third parties for the purpose of maximising rental income and improving the yield of the estate. The 2020/21 APP details a list of operational assets that have been reviewed and have been declared surplus to the Council's requirement. Some of these assets are not suitable for freehold disposal due to their location but do represent good opportunities to be leased on commercial terms, mitigating running cost and maintenance liabilities and offering regeneration opportunities. Subject to due process it is proposed that the following assets be appropriated from the operational estate into the investment estate:

<b>SURPLUS OPERATIONAL LEASED FOR INVESTMENT</b>		
<b>Property</b>	<b>Status</b>	<b>Action</b>
Former Radnor Road Caretakers House	COMPLETED	Let to Green Giraffe Day Nursery Ltd
Former Ninian Park Caretakers House	Ongoing	Lease
Former Museum Avenue PC's	Ongoing	Lease
Former Waterloo Gardens Rangers Hut	Ongoing	Lease

**Table 5. Annual Property Plan  
Investment programme 2020/21**

## 2020/21 End of Year Targets

18. Each APP contains end of year targets relating to the reduction of gross internal area, reduction of maintenance backlog, reduction of running cost and anticipated capital receipts. If the programme above completes as planned the following targets are expected to be achieved for 2020/21.

	Gross Internal Area reduction Sqft	Maintenance Backlog reduction	Total Running Cost reduction	Total Capital Receipt
APP target 2020/21	100,000	£500,000	£400,000	£10,000,000

**Table 5. Annual Property Plan 2020/21 Targets**

## Governance

19. The implementation of the APP will be overseen by the Asset Management Group (AMG) made up of senior managers from across all of the Council's service areas, with all opportunities presented for consideration to the Cabinet Member for Investment & Development. This will enable a strategic and corporate oversight and proper consideration of contribution towards the political Administration's objectives. The Terms of Reference have been reviewed with regards to membership and frequency of board meetings.
20. In addition to the internal Council review of the estate, opportunities to work closer with public sector partners will also be considered via quarterly meetings of relevant officers. Throughout 2020/21 the Council has frequently reviewed property partnership opportunities with public sector partners as part of our joint COVID response. Any initiatives generated by this activity will also be presented to the Cabinet Member for Investment & Development to consider.

## **Local Member consultation**

21. Member engagement will take place throughout the implementation of the plan.

## **Reasons for Recommendations**

22. To seek Cabinet approval of the 2020/21 Annual Property Plan.

## **Financial Implications**

23. The Annual Property Plan sets out an Action Plan and steps to be taken over the next year.
24. Robust long term asset management planning is a key element of the Council's Capital Strategy. This report highlights some of the property initiatives proposed as part of the Council's Annual Property Plan. These initiatives potentially have a range of differing financial implications which

will need to be considered in conjunction with Finance, as the strategy is implemented. These could include, risk of timing and value of disposal, options appraisal for sites, liabilities on transfer of properties, valuation for accounting purposes and ongoing holding costs of property. Of particular importance is VAT in disposals (freehold or lease) and in acquisitions. Early consideration of VAT should be undertaken as part of the disposal and acquisition process to ensure no adverse VAT and associated taxation implications. The financial implications of such initiatives will be reported as part of the governance arrangements for disposals.

25. Properties identified for disposal should be done so promptly in order to minimise revenue costs associated with holding onto surplus property. Where properties such as the retail parades are identified for disposal, the loss of rental income on the budget will need to be considered as part of the budget process.
26. The level of capital receipts is a key assumption in the affordability of the capital programme. The Capital Programme, approved by Council in February 2018 and in subsequent years, set a target for non-earmarked General Fund capital receipts of £41 million, after making a deduction for eligible revenue costs of disposal. Up to 31 March 2020, a total of £6.887 million has been generated against this target. The forecast for receipts when setting the 2020/21 resources was £7 million, from the disposal of land as well as a number of retail parades. The receipts received to date total £370,000. Regular monitoring of this target will need to be reported as part of updates to Cabinet and Asset Management Board, to avoid the risk of additional borrowing or review of schemes proposed as part of the Capital Programme. Earmarking of future receipts towards new expenditure, whilst the capital receipt target remains unmet represents a risk to achievement of the receipts target.
27. The Annual Property Plan includes land to be appropriated for Housing Revenue Account Housing purposes during 2020/21 as a disposal target for 2020/21. Consideration will need to be given to determining a valuation for key sites at an early stage so these can be undertaken in 2020/21 to ensure no adverse financial implications, for example in respect to the School Organisation Plan financial model

### **Legal Implications**

28. The Council has an obligation to ensure value for money in its management, acquisition and disposal of land and property as public assets. The Council's Acquisition and Disposal of Property Procedure Rules in Part 4 of the Council's Constitution sets out the matters to be considered with reference to Property transactions.
29. The decision about these recommendations has to be made in the context of the Council's public sector equality duties. The Council also has to satisfy its public sector duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The

Protected characteristics are: age, gender reassignment, sex, race – including ethnic or national origin, colour or nationality, disability, pregnancy and maternity, marriage and civil partnership, sexual orientation, religion or belief – including lack of belief. If the recommendations in the report are accepted and when any alternative options are considered, the Council will have to consider further the equalities implication and an Equality Impact Assessment may need to be completed.

30. The Well-Being of Future Generations (Wales) Act 2015 ('the Act') places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible.

In discharging its duties under the Act, the Council has set and published well being objectives designed to maximise its contribution to achieving the national well being goals. The well being objectives are set out in Cardiff's Corporate Plan 2018-21: <http://cmsprd.cardiff.gov.uk/ENG/Your-Council/Strategies-plans-and-policies/Corporate-Plan/Documents/Corporate%20Plan%202018-21.pdf> When exercising its functions, the Council is required to take all reasonable steps to meet its well being objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the well being objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.

The well being duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:

- Look to the long term
- Focus on prevention by understanding the root causes of problems
- Deliver an integrated approach to achieving the 7 national well-being goals
- Work in collaboration with others to find shared sustainable solutions
- Involve people from all sections of the community in the decisions which affect them

The decision maker must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible using the link below: <http://gov.wales/topics/people-and-communities/people/future-generations-act/statutory-guidance/?lang=en>

31. The Council has to be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards when making any policy decisions and consider the impact upon the Welsh language, the report and Equality Impact Assessment deals with all these obligations. The Council has to consider the Well-being of Future Generations (Wales) Act

2015 and how this strategy may improve the social, economic, environmental and cultural well-being of Wales.

### **HR Implications**

32. There are no HR implications for this report.

### **Property Implications**

33. All property considerations are described in the report.

### **RECOMMENDATION**

Cabinet is recommended to:

1. Approve the 2020/21 Annual Property Plan attached at Appendix 1.
2. Note the property transaction programme set out in Tables 1 to 5 of this report.
3. Delegate authority to the Director of Economic Development in consultation with the Cabinet Member for Investment and Development to develop detailed proposals relating to opportunities for the disposal of Council land to be presented back to Cabinet for authority to proceed.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Neil Hanratty</b>
	Director of Economic Development 11 December 2020

*The following appendix is attached:*

Appendix 1: Annual Property Plan 2020/21

This page is intentionally left blank

---

# Annual Property Plan 2020/21

---



Strategic Estates / Economic Development

December 2020

## Contents

1. EXECUTIVE SUMMARY .....	2
1.1. Corporate Property Strategy 2015-20 update .....	2
1.2. Ongoing APP work streams.....	2
1.3. COVID-19 APP impact.....	3
1.4. Summary of APP targets 2020/21.....	3
2. INTRODUCTION .....	4
2.1. WHAT IS THE APP? .....	4
2.2. WHY DO IT? .....	4
2.3. WHO?.....	4
2.4. HOW IS IT DELIVERED?.....	4
3. PROPERTY STRATEGY UPDATE.....	5
3.2. Corporate Property Strategy – future .....	5
4. WHAT WE DID – ANNUAL PROPERTY PLAN 2019/20.....	7
4.1. 2019/20 programme .....	7
4.2. Capital Receipts .....	8
4.3. 2019/20 APP summary & COVID-19 impact.....	9
5. WHAT WILL WE DO – ANNUAL PROPERTY PLAN 2020/21.....	10
5.1. 2020/21 Programme .....	10
5.2. APP targets 2020/21.....	12
5.3. Capital Receipts .....	12
5.4. 2019/20 APP summary & COVID-19 impact.....	12
6. £40M CAPITAL RECEIPTS PROGRAMME .....	13
6.1. Origins and requirement.....	13
6.2. Estate review .....	14
6.3. £40m programme 2018 to 2023 - Progress .....	15
7. RETAIL PARADES UPDATE .....	16
7.1. Origins and requirement.....	16
7.2. Progress to date .....	16
8. Schools Organisational Programme update.....	18
8.1. Origins and requirement.....	18
8.2. SOP Band B programme.....	18
8.3. Going forward.....	18
9. CONCLUSION .....	19
9.1. PROPERTY STRATEGY .....	19
9.2. ACTION PLAN .....	19

## 1. EXECUTIVE SUMMARY

### 1.1. Corporate Property Strategy 2015-20 update

- The Property Strategy 2015-20 established a series of property targets to be achieved by 2020. Key themes of the Property Strategy were:
  - **Modernisation** - To develop a more modern portfolio of assets which supports and assists delivery of front line services, costs less to run and is not in need of costly repair
  - **Collaboration** – To work closely with Public Sector and Community partners to identify opportunities for property and service collaboration
  - **Rationalisation** - Disposal or relinquishment of assets is the principal means of delivering Capital Receipts and achieving the APP targets relating to GIA, Maintenance Backlog and Running Cost reduction.
- Progress on the targets is reported through the Annual Property Plan (APP) detailing property disposals, relinquishments and leases
- The Property Strategy targets were met and exceeded by the end of 2019/20

	Building GIA (sqft) reduction	Maintenance Backlog reduction	Total Running Cost reduction	Capital Receipts received
Strategy target end 2019/20	1,172,351	£20,000,000	£5,000,000	£20,000,000
Strategy target end 2019/20 %	15	n/a	14	n/a
Achieved end 2019/20	<b>1,196,774</b>	<b>£20,516,519</b>	<b>£5,709,856</b>	<b>£35,845,939</b>
Achieved end 2019/20 %	15	n/a	15	n/a

Table 1. Corporate Property Strategy 2015- 2020 – all targets exceeded

- A new Property Strategy is being drafted and was originally scheduled to run from 2020 to 2025. Due to the impact of COVID-19, as well as its fast-changing implications for future Council working arrangements, this strategy is targeted for late 2021/22 but may well fall into a later year. The revised strategy will include new long term targets to measure estate performance.

### 1.2. Ongoing APP work streams

- **£40M Disposal Programme 2018/19 to 2022/23** – deliver additional capital receipts following comprehensive review of all land and property assets
- **Schools Organisational Programme** – Implementation of Band A and Band B programmes
- **Implementation of Corporate Landlord** - Improved knowledge of estate via condition surveys, utilisation analysis and service area plans. This will facilitate a Professional, Commercial and Proactive approach to estate management
- **Non-operational Estate** – Relinquishment of non-operational Assets in collaboration with local and other third party groups

### 1.3. COVID-19 APP impact

- The Annual Property Plan for 2020/21 is a standalone document designed to report property transactions for this year and an anticipated end of year position. This may well also be the approach adopted for 2021/22 as work on the new strategy is finalised.

### 1.4. Summary of APP targets 2020/21

	<b>Gross Internal Area reduction Sqft</b>	<b>Maintenance Backlog reduction</b>	<b>Total Running Cost reduction</b>	<b>Total Capital Receipt</b>
<b>APP target 2020/21</b>	100,000	£500,000	£400,000	£10,000,000

Table 2. Annual Property Plan 2020/21 targets

## 2. INTRODUCTION

### 2.1. WHAT IS THE APP?

The Annual Property Plan (APP) is an annual report that sets out the property programme for the forthcoming year; provides an in year update; and summarises key property related programmes. The APP primarily applies to the operational estate which comprises land and property used to deliver or support Council services.

### 2.2. WHY DO IT?

The Property Strategy 2015-20 established property targets to be achieved by 2020. The APP reports progress on these targets and establishes a programme for the coming year. This year (2020/21) is a standalone APP whilst work on a new Property Strategy is finalised, aligned with the Council's changing requirements and priorities resulting from the current and ongoing impact of COVID-19.

### 2.3. WHO?

The APP is delivered by the Strategic Estates Department (SED) within the Economic Development Directorate

### 2.4. HOW IS IT DELIVERED?

SED lead on the implementation of the APP under the guidance of the Asset Management Board and the Cabinet Member for Economic Development

#### **The four key APP targets are:**

- Floor Space reduction: reduce the size (Gross Internal Area GIA) of the estate;
- Revenue reduction: to reduce the annual running cost of the estate
- Maintenance reduction: decrease the maintenance backlog of the estate
- Capital Receipts: deliver capital receipts via disposal

These targets are established best practice in accordance with CIPFA (Chartered Institute of Public Finance and Accountancy), RICS (Royal Institution of Chartered Surveyors), The Welsh Audit Office and Welsh Government.

The Council's property estate is reviewed throughout the year and assessed in line with changing Service Area requirements to help support informed decision making over the short, medium and long-term.

The APP schedule of agreed property transactions will be subject to change throughout the financial year due to a range of factors that influence decision making and timescales.

The Council's established asset management process is designed to continually review and challenge the estate in order to provide a better, more efficient operational portfolio that aligns with the Council's vision, Corporate Plan and changing service needs.

The APP is an annual document designed to deliver the aims and objectives of the Property Strategy 2015-20. The 2020/21 APP is a standalone document as work on a new property strategy is finalised.

### 3. PROPERTY STRATEGY UPDATE

#### 3.1. Corporate Property Strategy 2015/2020

The Property Strategy 2015-20 agreed targets to be achieved by end of 2019/2020 relating to:

- Reduction of Gross Internal Area
- Reduction of Annual Running costs
- Reduction in Maintenance Backlog
- Achievement of Capital Receipts

These targets have been met through five Annual Property Programmes each financial year detailing property transactions such as freehold disposals, disposals via lease and also relinquishment of lease premises.

Table 3 shows, ***all four Property Strategy targets have been exceeded at the conclusion of financial year 2019/20.***



Table 3. Corporate Property Strategy 2015-2020 targets, all exceeded by March 2020.

#### 3.2. Corporate Property Strategy – future

A new Property Strategy is being drafted to succeed the now complete 2015/20 strategy. This was originally scheduled to run from 2020 to 2025 however due to the impact of COVID-19, as well as its fast-changing implications for future working arrangements, this strategy is targeted for late 2021/22 but may well fall into a later year.

It is important that preparatory work is now undertaken to understand the impact of COVID-19 on the Council’s business and property requirements. This will include the provision of suitable

support for staff to ensure effective continuity of service. The new strategy will likely need to include an increased degree of flexibility to allow the Council to adapt to changing requirements, COVID-19 measures and business needs over the coming months and years. Ultimately the new property strategy will establish revised long-term targets to measure asset management performance aligned with the Council’s budget and corporate objectives.

The targets identified in the new strategy will build on 2015/20. Due to the implementation of the One Planet Cardiff strategy and the 2030 corporate carbon reduction targets this establishes, it will be increasingly important to monitor and report progress of on the various initiatives within the “Built Environment”. This is the classification given to land and property in the One Planet report and a combination of behavioural, modernisation, relinquishment and offsetting initiatives will be required in order to meet the targets.

The property strategy will also incorporate commentary relating to:

- Core Office and satellite office accommodation
- Major Projects acquisitions and disposals
- Investment Estate acquisitions and disposals
- Governance clarification on the links between AMB and other relevant boards and working groups

## 4. WHAT WE DID – ANNUAL PROPERTY PLAN 2019/20

### 4.1. 2019/20 programme

In May 2019 Cabinet approved the 2019/20 APP and as a result the table below shows the transactions completed through that financial year:

OPERATIONAL PROPERTY DISPOSALS		
Property	Ward	Status
Former Llanrumney High School Site	Llanrumney	Appropriated to Housing
Former STAR Leisure Centre	Splott	Appropriated to Housing
Former St Mellons Enterprise Centre	Trowbridge	Appropriated to Housing
8 Library Street	Canton	Sold
Former Waungron HWRC (part)	Llandaff	Appropriated to Housing
Maelfa, former Police Station	Pentwyn	Appropriated to Housing
Tivoli Garage (HRA)	Llandaff North	Sold
St Mellons Police Station (Covenant removal)	Trowbridge	Sold
35 Heol Eglwys (Covenant removal)	Caerau	Sold

Table 4. Operational Property disposals 2019/20

SURPLUS LAND DISPOSALS		
Property	Ward	Action / Status
Land at Sanatorium Road	Canton	Appropriated to Housing
Heol Urban, Danescourt, Plot adjacent to 26	Llandaff	Sold
Land at Laurel Court	Fairwater	Sold
Land at Rhiwbina Hill former stable	Whitchurch & Tongwynlais	Sold
Land at Bridge Road, St Ederyns	St Mellons	Sold
Land at Fairfield Ind Estate	Pentyrch	Sold
Land adjacent to Vision Court, Pentwyn Road	Pentwyn	Sold
Land at Llantrisant Road - no.39	Llandaff	Sold
Land at Bridge Road 2, St Ederyns	St Mellons	Sold

Table 5. Surplus Land disposals 2019/20

SURPLUS RETAIL PARADES		
Property	Ward	Action / Status
82 Pwllmelin Road unit	Fairwater	Sold
Cae Glas Road retail parade	Rumney	Sold

Table 6. Surplus Retail Parade disposals 2019/20

OPERATIONAL LEASE RELINQUISHMENTS		
Property	Ward	Reported
Grangetown Buzz Caffi	Grangetown	Lease Relinquished (Expired and not renewed)
Occupational Health Office, Nantgarw	Nantgarw	Lease Relinquished (Expired and not renewed)

Table 7. Operational properties that were leased to the Council but have been relinquished 2019/20

LEASED ON COMMERCIAL OR COMMUNITY TERMS		
Property	Ward	Action / Status
Former Sophia Gardens Bungalow / Lodge	Riverside	Commercial Lease
Former Thompson Park Rangers Hut	Canton	Commercial Lease
Grange Gardens Rangers Hut	Grangetown	Community Lease

Table 8. Operational properties that were surplus so leased to third party tenants on community or commercial terms 2019/20

The net impact of the APP transactions in tables 4 to 8 resulted in the following end of year position:

	Building GIA (sqft) reduction	Maintenance Backlog reduction	Total Running Cost reduction	Capital Receipts received
<b>APP target 19/20</b>	200,000	£4,000,000	£600,000	£15,000,000
<b>APP target %</b>	3	3.8	1.7	n/a
<b>Achieved 19/20</b>	16,656	218,300	242,001	3,847,208
<b>Achieved %</b>	0.2	0.2	0.7	n/a

Table 9. APP 2019/20 targets vs achieved

#### 4.2. Capital Receipts

As described in section 6, in 2018/19 the APP reported a £40m general fund capital receipts target to be achieved through years 2018/19 – to 2022/23. To monitor progress against this target, the total receipts received each year are split into General fund (counts towards £40m) and ring-fenced (not counted towards £40m). The 2019/20 split is as follows:

	General Fund Receipts	Ring-fenced Receipts	Total Capital Receipt
<b>TOTAL</b>	£1,395,500	£2,451,708	£3,847,208

Table 10. Capital receipts split by general fund and ring-fenced

#### 4.3. 2019/20 APP summary & COVID-19 impact

The Annual Property Plan is a dynamic process and subject to change throughout the year. A variety of factors will influence the timescales and progress of property projects such as market forces, changing operational requirements and external factors / decisions, sometimes outside of the Council's control. Transactional delays and revised project timescales sometimes result in affected properties being moved from one years programme to another. Where this occurs, it is important to note that the proposed property impact will still be achieved, however will be realised at a later date than first anticipated.

The impact of COVID-19 in March 2020 resulted in the completion delay of several significant transactions that would have contributed heavily to the achievement of in year targets. The majority of these transaction will now complete in APP 2020/21 and can be seen in the programme in section 5. Some transactions have required significant renegotiation, or due to the impact of COVID-19 either on Council requirements and decision making, or that of the commercial market, may no longer be shown in the current programme.

## 5. WHAT WILL WE DO – ANNUAL PROPERTY PLAN 2020/21

### 5.1. 2020/21 Programme

The APP programme for the current financial year, including completed transactions, is shown below:

OPERATIONAL PROPERTY DISPOSALS			
Property	Ward	Status	Action
Former Llanrumney Play Centre & Land	Llanrumney	Ongoing	Sell
Former Michaelston College	Ely	Ongoing	Appropriation to Housing
St Mellons Housing site	Trowbridge	Ongoing	Sell
Former Rumney High land	Rumney	Ongoing	Appropriation to Housing
Harvey Street Car Park (part)	Canton	Ongoing	Appropriation to Housing
Trowbridge Children's Home	Rumney	Ongoing	Sell
Western Control Centre (Bunker)	Llandaff	Ongoing	Sell

Table 11. Operational Property disposals 2020/21

SURPLUS LAND DISPOSALS			
Property	Ward	Status	Action
Land at 200 Fairwater Rd	Fairwater	COMPLETE	SOLD
Land at the Beacon Centre	Trowbridge	COMPLETE	SOLD (exchange pending)
Land at Brindley Road (Cardiff Marina)	Grangetown	Ongoing	Sell
Land adjacent to Brachdy Lane	Rumney	Ongoing	Sell
Land at Caer Wenault / Pantmawr Rd	Rhiwbina	Ongoing	Sell
Land at Beaumaris Road	Rumney	Ongoing	Appropriation to Housing
Land at Flaxland Avenue	Gabalfa	Ongoing	Discussing potential acquisition with local community group

Table 12. Surplus Land disposals 2020/21

NON-OPERATIONAL FREEHOLD & LEASEHOLD DISPOSAL			
Property	Ward	Status	Action
Former Trelai Bowls Pavilion	Caerau	COMPLETE	Leased to Ely & Caerau Sports Trust
Land at Railway Street	Splott	COMPLETE	Leased to Green Squirrel

Former Fairwater Social Club	Fairwater	Ongoing	Appropriate to Housing
Paddlesteamer	Butetown	Ongoing	Sale of residual freehold interest
<b>Lydstep Changing Rooms</b>	<b>Llandaff North</b>	<b>COMPLETE</b>	<b>Leased to Cardiff Draconians FC</b>
Canal Park land	Butetown	Ongoing	Lease to CAVC
Stacey Road caretakers (Flying Start)	Adamsdown	Ongoing	Lease to Little Angels
Selected Tennis Courts (Hailey Park and Victoria Park)	Various	Ongoing	Lease to Tennis Wales
Llandaff CIW Primary caretakers house	Llandaff	Ongoing	Lease

Table 13. Surplus Operational properties to be disposed via lease on community terms, or existing leased non-operational premises sold for capital receipt 2020/21

<b>RETAIL PARADE DISPOSALS</b>			
<b>Property</b>	<b>Ward</b>	<b>Status</b>	<b>Action</b>
<b>56a &amp; 56b shops at Plasmawr Road</b>	<b>Fairwater</b>	<b>COMPLETE</b>	<b>Sold</b>
<b>Llangranog Road - Premium payment 1</b>	<b>Llanishen</b>	<b>COMPLETE</b>	<b>Payment received</b>
<b>Llangranog Road - Premium payment 2</b>	<b>Llanishen</b>	<b>COMPLETE</b>	<b>Payment received</b>
Fishguard Road Retail Parade	Llanishen	Ongoing	Sell
<b>Bishopston Road Retail Parade</b>	<b>Caerau</b>	<b>COMPLETE</b>	<b>Sold</b>
Llangranog Road Retail Parade	Llanishen	Ongoing	Sell

Table 14. Surplus Retail Parades to be disposed 2020/21

<b>SURPLUS OPERATIONAL LEASED FOR INVESTMENT</b>			
<b>Property</b>	<b>Ward</b>	<b>Status</b>	<b>Action</b>
Former Radnor Road Caretakers House	Canton	COMPLETE	Let to Green Giraffe Day Nursery Ltd
Former Ninian Park Caretakers House	Grangetown	Ongoing	Lease
Former Museum Avenue PC's	Cathays	Ongoing	Lease
Former Waterloo Gardens Rangers Hut	Penylan	Ongoing	Lease

Table 15. Surplus Operational property to be leased on commercial terms 2020/21

## 5.2. APP targets 2020/21

The net impact of the APP transactions in tables 11 to 15 is anticipated to meet the following end of year position:

	Building GIA (sqft) reduction	Maintenance Backlog reduction	Total Running Cost reduction	Capital Receipts received
<b>APP target 19/20</b>	100,000	£500,000	£400,000	£10,000,000
<b>APP target %</b>	3	n/a	1.1	n/a

Table 16. APP targets 2020/21

## 5.3. Capital Receipts

To monitor progress against this target, the total receipts received each year are split into General fund (counts towards £40m) and ring-fenced (not counted towards £40m). The 2020/21 split is as follows:

	General Fund Receipts	Ring-fenced Receipts	Total Capital Receipt
<b>TOTAL</b>	Circa £4.5m	Circa 5.5m	£10,000,000

Table 16a. Capital receipts split by general fund and ring-fenced

## 5.4. 2019/20 APP summary & COVID-19 impact

The impact of COVID-19 in March 2020 resulted in the completion delay of several significant transactions that would have contributed heavily to the achievement of last year's targets. The majority of these transaction will now complete in APP 2020/21.

## 6. £40M CAPITAL RECEIPTS PROGRAMME

### 6.1. Origins and requirement

The 2018/19 APP reported a target to raise £40m of additional (non ring-fenced) capital receipts (net of fees) over a 5-year period to support the Council's capital programme.

This requires capital receipts be delivered from the disposal of land and buildings from the Council's Operational, Non-Operational and Land portfolios to support the following:-

- £15m capital receipts required to support the expenditure on schools as part of the 21st Century Schools Band B Programme; and
- £25m capital receipts required for all other expenditure commitments included as part of the approved capital programme.

The £40m target was forecast to be achieved in the following estate portfolios over the five year period 2018/19 to 2022/23.

Portfolio	Target	Overall Target
Operational Property	£16,000,000	£25m from general property estate
Land Review	£6,000,000	
Retail and Non-Op	£3,000,000	
SOP (Education)	£15,000,000	£15m from SOP
<b>TOTAL</b>	<b>£40M</b>	

Table 17. £40m target portfolio split

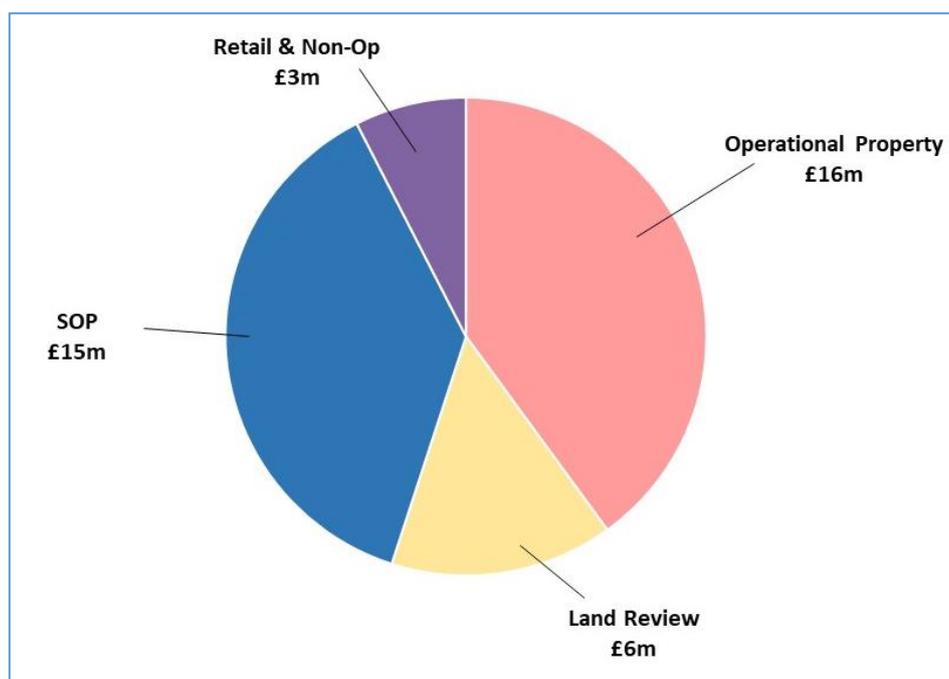


Chart 1. £40m anticipated portfolio split

## 6.2. Estate review

To meet this target, the Strategic Estates Department (SED) is carrying out a rolling, annual review of land and property assets to identify surplus property suitable for disposal within the 5 year programme and beyond. This includes:

### **Operational Buildings**

The principle of “fewer but better buildings” established in the Property Strategy 2015-20 has been implemented over the last five financial years resulting in a significant reduction in the size, running costs and maintenance backlog of the estate and delivering capital receipts. SED is working with service areas to review running costs; maintenance backlog, space utilisation and to identify opportunities for rationalisation of operational buildings. Condition surveys and an utilisation audit have been completed to support decisions on the future of buildings.

### **Land**

The Council has undertaken a review of all of its land holdings to identify potential opportunities for disposal. A number of opportunities have emerged to dispose small slithers of land on the boundary of green spaces. These opportunities primarily relate to areas of land that are not currently utilised or accessed by the public. In addition, the Council may wish to review disposal of small pockets of land to unlock capital investment to upgrade recreational facilities. For example, the disposal of small areas of land adjacent to existing playing fields could fund investment into proper pitch and land drainage systems and/or new fit for purpose changing facilities enabling existing sports and recreational facilities to be much better utilised.

### **Non-investment/ leased Estate**

This comprises a varied portfolio of assets including Retail Parades that do not sit within the investment estate but are leased or occupied by third parties for community or commercial use. As with the review of Operational assets, the ongoing review will identify running costs; condition and maintenance backlog; strategic reasons for retention of the assets; and provide recommendations for retention, re-modelling or releasing to the market.

### **Schools Operational Planning (SOP)**

The School Band B programme proposes to release surplus school sites either for re-use by the Council or for disposal to generate capital receipts. SED will continue to work with SOP to develop feasibility on the re-use of surplus assets to maximise opportunities and ensure timely release to the market for disposal or alternatively, appropriation to the Housing Revenue Account.

All of the opportunities identified to date require further consideration and due diligence, including discussions with local members.

### **Benefits of disposal programme**

The disposal of surplus land and buildings provides further benefits to the Council and the city as a whole. These being:

- Delivery of affordable housing
- Delivery of market housing
- Savings from releasing Council's liability of assets
- Regeneration opportunities
- Development impact on Economic Development objectives

### 6.3. £40m programme 2018 to 2023 - Progress

As of November 2020 the following progress has been made towards the £40m capital receipt target. These figures are for general fund receipts only. All ring-fenced receipts are excluded.

As of November 2020 £7.9m has been delivered. If all transactions anticipated for this current financial year 2020/21 complete, the total general fund receipts obtained since the start of the programme will be £12m.

Table 18 shows the progress in the defined portfolios.

Portfolio	Target	Anticipated by March 2021	Anticipated by March 2021 %
<b>Operational Property</b>	£16,000,000	<b>£8,571,058</b>	<b>54%</b>
<b>Land Review</b>	£6,000,000	<b>£1,494,500</b>	<b>25%</b>
<b>Retail and Non-Op</b>	£3,000,000	<b>£1,985,000</b>	<b>67%</b>
<b>SOP (Education)</b>	<b>£15,000,000</b>	<b>£0</b>	<b>0%</b>
<b>TOTAL</b>	<b>£40M</b>	<b>£12,050,558</b>	<b>30%</b>

Table 18. Portfolio receipts to date and outstanding required

#### Going forward

The impact of COVID-19 has resulted in various planned transactions being delayed or in some instances, has necessitated a degree of re-negotiation therefore affecting the projected value. These capital receipts will still be delivered however at a later time, potentially post 2022/23. This is particularly relevant to the SOP programme as the projected value within the portfolio remains in line with expectations, but delivery of selected receipts is now forecast later than originally planned.

## 7. RETAIL PARADES UPDATE

### 7.1. Origins and requirement

The 2019/20 APP reported Strategic Estates Department (SED) had completed a review of the Council's retail parades within the non-operational portfolio.

At that time the Council owned 21 retail parades distributed across the city of varying type, quality, condition and with varying tenancy arrangements in place. Most of the parades were in a poor condition with a significant maintenance backlog and are management intensive.

It was determined that given the limited available capital to re-invest in these assets, they represent a liability to the Council and have an overall detrimental effect on the quality and value of the Council's estate.

As such, it was proposed to dispose of the 14 Parades which were in the most need of investment over the next few years – as market conditions allowed. In advance of bringing each parade to the market it was agreed SED would undertake a detailed review of the assets to regularise all existing leases, and where appropriate, to terminate leases and/or renew or extend leases to ensure each parade is in the best commercial condition to maximise the capital receipt.

### 7.2. Progress to date

Table 19 shows the Retail Parades identified for potential disposal and provides an up to date status.

RETAIL PARADE DISPOSALS			
Property	Ward	Status / Intent	Proposal
<b>Bishopston Rd Retail Parade</b>	<b>Caerau</b>	<b>Sold</b>	<b>Sold</b>
<b>Heol Trenewydd Retail Parade</b>	Caerau	SELL	Under review
<b>Grand Avenue Retail Parade</b>	Ely	SELL	Under review
<b>Wilson Rd Retail Parade</b>	Ely	SELL	Under review
<b>82 Pwllmelin Rd</b>	<b>Fairwater</b>	<b>Sold</b>	<b>Sold</b>
<b>Chestnut Rd Retail Parade</b>	Fairwater	SELL	Under review
<b>Plasmawr Rd Retail Parade</b>	Fairwater	SELL	Under review
<b>56a &amp; 56b Plasmawr Rd Retail Parade</b>	<b>Fairwater</b>	<b>Sold</b>	<b>Sold</b>
<b>Gabalfa Avenue Retail Parade (No's 49-59)</b>	Llandaff North	SELL	Under review
<b>Gabalfa Avenue Retail Parade (No's 85-93)</b>	Llandaff North	SELL	Under review
<b>Llangranog Rd Retail Parade</b>	Llanishen	SELL	2020/21 APP programme
<b>Fishguard Rd Retail Parade</b>	Llanishen	SELL	2020/21 APP programme
<b>Burnham Avenue Retail Parade</b>	Llanrumney	SELL	Under review
<b>Cae Glas Retail Parade</b>	<b>Rumney</b>	<b>Sold</b>	<b>Sold</b>
<b>Harris Avenue Retail Parade</b>	Rumney	SELL	Under review

Table 19. Retail Parades review – progress to date

To date:

- 4 disposals have completed in the Retail Parade portfolio.
- A further 2 parades are programmed for disposal by the end of 2020/21.
- The remaining Retail Parades are subject to review over 2021/22 and 2022/23.

## 8. Schools Organisational Programme update

### 8.1. Origins and requirement

The Band B 21st Century School Strategy commits to deliver: “Inspiring, sustainable, community focused schools in which children and young people can achieve their potential”. The value of the programme submitted by Cardiff Council was £284 million, of which Welsh Government committed to make a significant contribution.

### 8.2. SOP Band B programme

#### Secondary Schools

- Cantonian High School - It is proposed that Cantonian High School is rebuilt and expanded to provide a new 11-18 high school, with eight forms of entry (8FE)
- Fitzalan High School - It is proposed that Fitzalan High School is rebuilt as a new 11-18 high school, with ten forms of entry (10FE)
- Willows High School - It is proposed that Willows High School is rebuilt and expanded to provide a new 11-16 high school, with eight forms of entry (8FE)
- Cathays High School - It is proposed that Cathays High School is rebuilt and expanded to provide a new 11-18 high school, with eight forms of entry (8FE)
- Cardiff High School - It is proposed that Cardiff High School is expanded and remodelled to provide an 11-18 high school, with ten forms of entry (10FE).

#### Primary Schools

- St Mary the Virgin Primary School - It is proposed that St Mary the Virgin Primary School is replaced with a new school and its capacity increased by 30 places per year to a two form of entry school (2FE).
- Fairwater Primary School - It is proposed that Fairwater Primary School is enlarged and its capacity increased by 30 places per year to establish a two form of entry school (2FE).
- Ysgol Pen y Pil - It is proposed that Ysgol Pen y Pil is enlarged and its capacity increased by 30 places per year to a two form of entry school (2FE).
- Ysgol Gymraeg Nant Caerau - It is proposed that Ysgol Gymraeg Nant Caerau is enlarged and its capacity increased by 30 places per year to a two form of entry school (2FE).

#### Special Schools

Four special schools have been ‘D’ rated for suitability and are in need of replacement:

- Riverbank School - For children aged 4-11 with severe and complex learning disabilities.
- Woodlands School - For pupils aged 11-19 with severe and complex learning disabilities.
- The Court School - For children aged 4-11 with emotional health and wellbeing needs also commonly referred to as ‘behaviour emotional and social needs.
- Greenhill School - For pupils aged 11-16 with emotional health and wellbeing needs.

### 8.3. Going forward

- Ongoing identification of property implications to support best value outcome for individual proposals
- Consideration of affordability and any prioritisation required in line with the approved band B programme and terms and conditions of Welsh Government funding
- Alignment with £40m capital receipt programme
- Governance alignment with Asset Management Board

## 9. CONCLUSION

### 9.1. PROPERTY STRATEGY

- The completion of all targets in the Corporate Property Strategy and the impact this has and on the efficient management of the estate and Council budget is significant. Establishing an Annual Property Plan has been successful as a regular reporting process and is envisaged to continue going forward.
- Agreeing long term targets in the strategy, delivered by in year targets set out in the APP has been an effective implementation vehicle for property improvement.
- The property strategy established new governance and a corporate approach to property management that has improved communication and decision making.

### 9.2. ACTION PLAN

- Going forward it will be important to build on the success of the Corporate Property Strategy to ensure it best captures the governance and management requirements of the Council's property estate.
- It is proposed the strategy will be expanded to include further detail in the following key areas:
  - **School Organisational Planning** – reporting progress on planned school developments and future strategies and opportunities
  - **Investment Estate** – the acquisition and disposal of assets within the commercial leased portfolio and the impact on rental assumptions
  - **Major Projects** - the acquisition and disposal of assets linked to major projects and the strategic role of these transaction
  - **Housing** – reporting progress on planned housing developments and future strategies and opportunities.
- Economic Development will present further detail to cabinet on the implementation of the above proposals in Q1 of 2021/22.

**LLANDAFF CONSERVATION AREA REVIEW****STRATEGIC PLANNING & TRANSPORT (COUNCILLOR CARO WILD)****AGENDA ITEM: 13**

---

**Reason for this Report**

1. To seek approval of an extension to the Llandaff Conservation Area boundary; adoption of an updated Conservation Area Appraisal (CAA); and authorisation to make an additional Article 4(2) Direction to cover the extended area.

**Background**

1. A Conservation Area is defined in the Planning (Listed Buildings and Conservation Areas) Act, 1990 as, 'an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance'.
2. There are currently 27 Conservation Areas within Cardiff. These were designated at various points between 1968 and 2007.
3. Section 69 of the Act imposes a duty on Local Authorities to review their Conservation Areas 'from time to time' and to consider whether further designations are appropriate. Llandaff was the first area to be designated and was last reviewed in 2005. Members may recall that an additional Article 4 Direction relating to the partial demolition of boundary walls was served in 2018.
4. The Cardiff Local Development Plan (LDP) Policy EN9 confirms that the Council will continue to review its conservation area designations, boundaries and CAAs as required against recognised national criteria and those characteristics identified in the approved Cardiff Conservation Area Strategy.

**Issues**

5. The revised draft appraisal was prepared in consultation with the local Llandaff Conservation Advisory Group, which includes local member representation and members of the Llandaff Society.

6. The appraisal was the subject of public consultation over a period of 9 weeks between 11<sup>th</sup> November 2019 and 12<sup>th</sup> January 2020. This included writing to all owners within the extended area proposed for inclusion, information being placed on the Council's website and social media, along with a pop-up exhibition and public drop-in sessions held at Insole Court.

### **Consultation responses**

7. Appendix 3 sets out a full response to the comments received. A number of respondents offered corrections and local information, ensuring that the CAA continues to provide an accurate description of local character. The comments received have shaped the final document. Other comments can be summarised as follows:

#### **The boundary**

- No objections were received to the proposal to extend the conservation area boundary to include the eastern end of Fairwater Road and The Avenue. All comments relating to this were positive.
- Rookwood Hospital, the rowing club and the river corridor leading towards Llandaff North were areas put forward for inclusion, however these areas are considered to be remote from the core of the conservation area. This part of the riverside landscape is not a core component of the built character of Llandaff, and it is protected by the LDP Policy EN4 for 'River Corridors'. Rookwood is a protected site under its Grade II listings, Registered Historic Park status and the Tree Preservation Orders in place.

#### **Description of the area's character and appearance**

- The document has been expanded to provide a more detailed description of the area's character, particularly the section relating to architectural detailing. This was welcomed by respondents.

#### **Management and guidance**

- The new *Management Plan* (Section 6) was welcomed, setting out overarching aims and objectives through which decision making should take place.
- It is recognised that many of the issues and opportunities identified within the appraisal need continued coordination with support from the local community and through corporate initiatives and asset management.
- A new *Guidance and Design Standards* chapter gives building owners more comprehensive advice on how the council will seek to manage change through the planning system. This was also welcomed by consultees.

### **Reason for Recommendations**

8. The recommendations are based on the thorough analysis of the purposes

of protecting the special character or appearance of the area and consideration of consultation responses. It has been concluded that it is considered appropriate to designate the extended Llandaff Conservation Area along with approval of the supporting Conservation Area Appraisal.

9. In order to effectively manage change within the extended area, it is proposed that an Article 4 Direction be served to replicate the level of control over minor development which is currently in place within the rest of the conservation area; removing various householder permitted development rights for changes to windows, doors, hard surfaces, roofs and boundaries. This is subject to a statutory period during which residents can make representations. A decision to confirm the order must take account of responses received and be made within six months of the date of service.

### **Financial Implications**

10. No direct financial implications are expected to arise from the designation of the Llandaff Conservation Area. The management of any resulting future applications will be met from within existing resources.

### **Legal Implications**

11. Section 69 of the Planning [Listed Buildings and Conservation Areas] Act 1990 (“the Act”) states that: “(1) Every local planning authority (“LPA”) – (a) shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance; and (b) shall designate those areas as conservation areas”
12. An LPA has an additional duty under Section 69 (2) of the Act in that from time to time it must review the work done under s69 (1) (a) and (b) to determine whether any parts or any further parts of their area should be designated as conservation areas and if so to designate them accordingly.
13. Members should note that if an area is subsequently designated as a conservation area the protection afforded to buildings and trees contained within the area is enhanced; the LPA and Welsh Government (in an appeal) in carrying out its functions under the Planning Acts and in particular for determining applications for planning permission and listed building consent will be required under Section 72 of the Act to pay special attention to the “desirability of preserving or enhancing the character or appearance of that area”.
14. Designation notifications required in London Gazette and a local newspaper. It must be registered as a planning local land charge. The council must also notify the Welsh Ministers.
15. The decision on whether to approve the designation as a conservation area must be made in terms of the statutory purpose of protecting the special character or appearance of the area. Considerations which fall

outside the statutory definition of a conservation area should not be taken into account.

#### **Article 4 Direction**

16. In addition to designating an area as a Conservation Area under Section 69 of the Planning (Listed Building and Conservation Areas) Act 1990, the Council has the additional power to serve an Article 4(2) Direction under the Town and Country Planning (General Permitted Development) Order 1995 (“the Order”).
17. Welsh Government Circulars provides guidance on the use of Article 4(2) Directions and the procedure for making them.
18. A Direction under the Article 4(2) restricts the scope of the permitted development rights in relation to a Conservation Area. By withdrawing the deemed permission under the Order, its effect is that an application for express planning permission has to be made for those development proposals excluded under the Direction. If the permission is refused or granted subject to those other than in the Order, the landowner is entitled under the Order to claim compensation for abortive expenditure and any loss or damage caused by the loss of rights.
19. It should be further noted that the Council has six months from the date of service of the Direction to confirm it otherwise it expires. The Order confers no power upon the Council to confirm the Direction with variations. It must, therefore, be confirmed in the same terms on which it was initially drawn and consulted upon
20. The Council has to be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards when making any policy decisions and consider the impact upon the Welsh language. The Council has to consider the Well-being of Future Generations (Wales) Act 2015 and how this strategy may improve the social, economic, environmental and cultural well-being of Wales.
21. The Well-Being of Future Generations (Wales) Act 2015 (‘the Act’) places a ‘well-being duty’ on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible.
22. In discharging its duties under the Act, the Council has set and published well-being objectives designed to maximise its contribution to achieving the national well-being goals. The well-being objectives are set out in Cardiff’s Corporate Plan 2019-22: <https://www.cardiff.gov.uk/ENG/Your-Council/Strategies-plans-and-policies/Corporate-Plan/Pages/Corporate-Plan.aspx>. When exercising its functions, the Council is required to take all reasonable steps to meet its well-being objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the well-being objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.

23. The well-being duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:
- Look to the long term
  - Focus on prevention by understanding the root causes of problems
  - Deliver an integrated approach to achieving the 7 national well-being goals
  - Work in collaboration with others to find shared sustainable solutions
  - Involve people from all sections of the community in the decisions which affect them
24. The decision maker must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible using this link: <http://gov.wales/topics/people-and-communities/people/future-generations-act/statutory-guidance/?lang=en>
25. The Council has to satisfy its public sector duties under the Equalities Act 2010 (including specific Welsh public sector duties) – the Public Sector Equality Duties (PSED). These duties require the Council to have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of 'protected characteristics'. The 'Protected characteristics' are: • Age • Gender reassignment • Sex • Race – including ethnic or national origin, colour or nationality • Disability • Pregnancy and maternity • Marriage and civil partnership • Sexual orientation • Religion or belief – including lack of belief .

### **HR Implications**

26. There are not HR implications arising from this report

### **Property Implications**

27. There are no specific property implications to this report. Where Council properties lie within designated Conservation Areas, they should be managed in accordance with planning and Conservation Area regulations and any proposed alterations made in consultation with Strategic Estates and relevant service areas.

## **RECOMMENDATIONS**

Cabinet is recommended to:

- (1) Designate the area shown on Appendix 1 as the Llandaff Conservation Area in accordance with Section 69 of the Planning [Listed Buildings and

Conservation Areas] Act 1990.

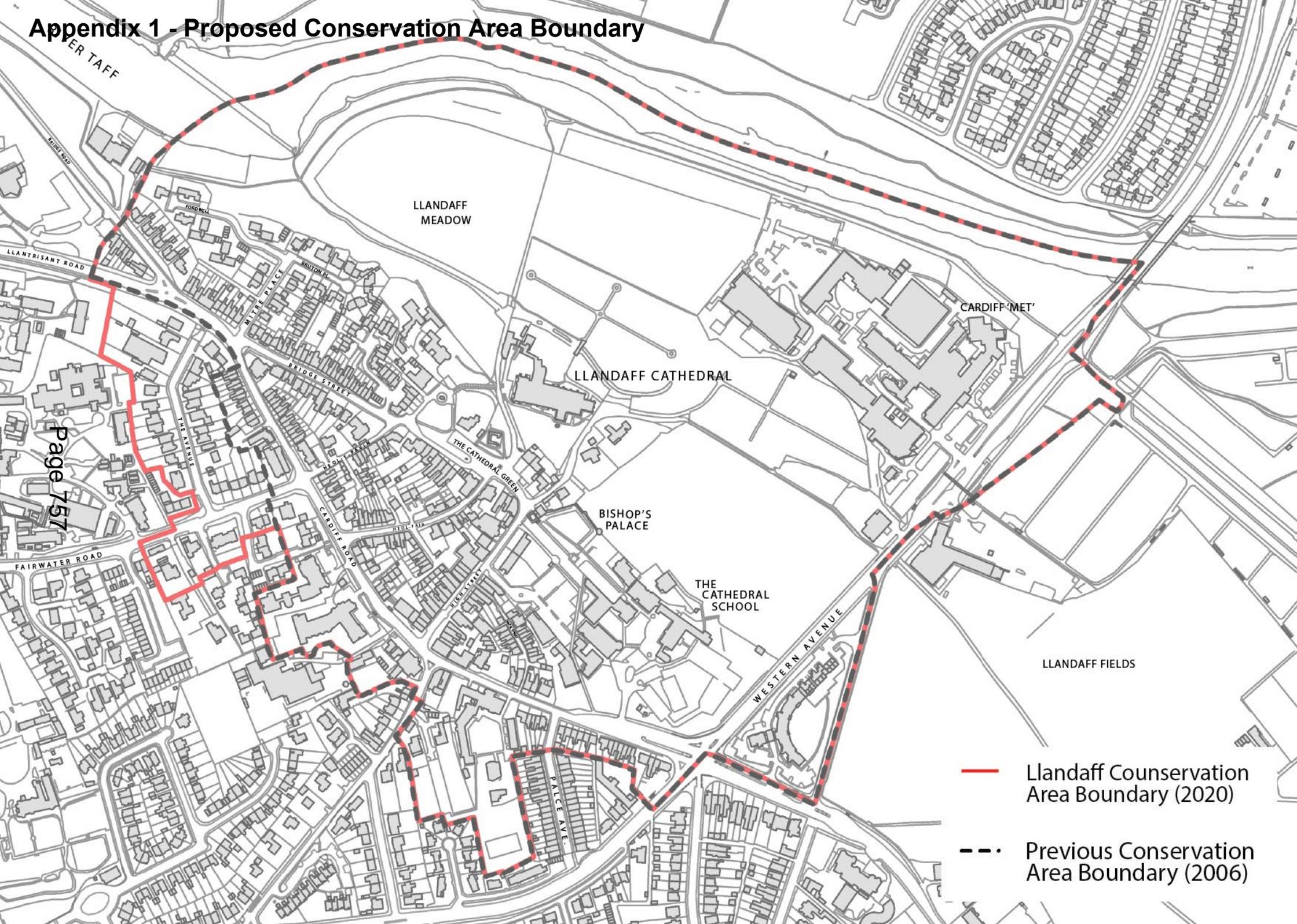
- (2) Adopt the Llandaff Conservation Area Appraisal shown in Appendix 2, in accordance with Section 71 of the Planning [Listed Buildings and Conservation Areas] Act 1990;
- (3) Authorise the making and service of an Article 4 Direction for the conservation area

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>ANDREW GREGORY</b> <b>Director Planning, Transport &amp; Environment</b>
	11 December 2020

The following appendices are attached:

- Appendix 1 – Proposed revised Llandaff Conservation Area Boundary
- Appendix 2 – Llandaff Conservation Area Appraisal
- Appendix 3 – Consultation responses

# Appendix 1 - Proposed Conservation Area Boundary



LLANDAFF MEADOW

LLANDAFF CATHEDRAL

BISHOP'S PALACE

THE CATHEDRAL SCHOOL

CARDIFF MET

LLANDAFF FIELDS

— Llandaff Conservation Area Boundary (2020)

- - - Previous Conservation Area Boundary (2006)

This page is intentionally left blank

# Llandaff

## Conservation Area Appraisal



## Placemaking - Planning

[www.cardiff.gov.uk/conservation](http://www.cardiff.gov.uk/conservation)

[conservation@cardiff.gov.uk](mailto:conservation@cardiff.gov.uk)

## Liability and Disclaimer

While reasonable care has been taken in the preparation of this document to ensure that the information contained is accurate, this document, its content, names, text and images included in this document, are provided 'AS IS' and without warranties of any kind, either express or implied. To the fullest extent permissible pursuant to UK law, the County Council of the City and County of Cardiff ['The Council'] disclaims all warranties expressed or implied, including but not limited to implied warranties of reasonable care, satisfactory quality or fitness for a particular purpose and non-infringement of title.

The document contains guidance and notes on certain aspects of law as they might affect the average person. They are intended as general information only and do not constitute legal or other professional advice. It should not be relied on as the basis for any decision or legal action. The Council cannot accept liability for any loss suffered due to reliance on the contents of this document. The law is constantly changing so expert advice should always be sought.

To the extent permitted by applicable laws, no liability is accepted for any direct, indirect, incidental, special or consequential loss or damage to any user (whether arising in contract, tort including negligence or otherwise) arising out of or in connection with the use of this document.

The contents of this document shall not fetter the Council in the exercise of any of its statutory functions, including, without limitation to the generality of the foregoing, its functions as Local Planning Authority or Local Highway authority

# Contents

<b>1.</b>	<b>Introduction</b>	<b>4</b>
1.1	Background	4
1.2	Appraisal Review Process	4
1.3	Llandaff Conservation Area	5
1.4	Boundary Review	6
<b>2.</b>	<b>Planning Policy Context</b>	<b>11</b>
2.1	UK and Welsh Legislation	11
2.2	Local Planning Policy	11
2.3	Other Guidance	11
2.4	Consultation	12
<b>3.</b>	<b>Historic Significance</b>	<b>13</b>
3.1	Summary of Significance	13
3.2	Llandaff's Historic Background	13
3.3	The Architectural and Historic Importance of Llandaff	13
<b>4.</b>	<b>Character Assessment</b>	<b>19</b>
4.1	Appraising Character	19
	a. A Distinctive Quality of Place	19
	b. The Presence of Landmark Buildings and Landscape Features	27
	c. Hierarchies of Public and Private Space	27
	d. High Quality Local or Unusual Materials in the Townscape	32
	e. High Quality Architectural Detailing	33
	f. High Quality Hard and Soft Landscaping	38
<b>5.</b>	<b>Areas of Special Character</b>	<b>41</b>
5.1	The Cathedral Precinct and River Taff	41
5.2	The Cathedral Green	44
5.3	High Street and Chapel Street	47
5.4	Mitre Place, Bruton Place and Fordwell	48
5.5	Cardiff Road	49
5.6	Western Avenue	50
5.7	Bridge Street, Bridge Road, Heol-y-Pavin and Heol Fair	51
5.8	The Avenue and Fairwater Road	52
<b>6.</b>	<b>Management Plan – Aims and Objectives</b>	<b>53</b>
<b>7.</b>	<b>Guidance and Design Standards</b>	<b>54</b>

# 1.0 Introduction

## 1.1 Background

Conservation areas are areas of special architectural or historic interest. A decision to designate a conservation area is made by the Council after an assessment of the character of the area. This assessment extends beyond the buildings alone; the road layout, street scene, trees and green spaces can all contribute to the quality of an area. Designation gives special protection to this character and to achieve this, the Council has extra controls over demolition, minor alterations or development and the protection of trees. A conservation area is formally defined as an area 'of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance' (Planning (Listed Buildings and Conservation Areas), Act 1990).

## 1.2 Appraisal Review Process

The Council has a duty to review conservation areas. More specifically, local planning authorities are required to 'formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas' and review them from time to time. (Ref. Section 71 (1), Planning (Listed Buildings and Conservation Areas), Act 1990).

It is important to review conservation areas at regular intervals to note any characteristics that have improved or diminished, to propose any necessary changes to conservation area boundaries and to create a plan for any further management. In Cardiff, the Conservation Area Strategy (1997) provides an overarching framework for managing the Conservation Area Appraisal process. The strategy identifies priorities for the city, together with criteria for appraising character in both existing and new areas.

The Llandaff Conservation Area was designated in March 1968 following the first environmental study and planning brief to be undertaken in Cardiff. A series of further studies were undertaken during the 1970s and 1980s. In 2005, Cardiff Council undertook a conservation area appraisal which was later adopted and published in 2006 and included an extension to the boundary. A dialogue with the Llandaff Conservation Group between 2017-19 has informed this current review.

The overarching aim is to preserve and enhance the character and appearance of the Llandaff Conservation Area and to provide a basis for making sustainable decisions about its future evolution. In order to undertake works of enhancement, the character of the conservation area needs to be clearly defined and understood (through a character appraisal).

This Conservation Area Appraisal and management plan seeks to:

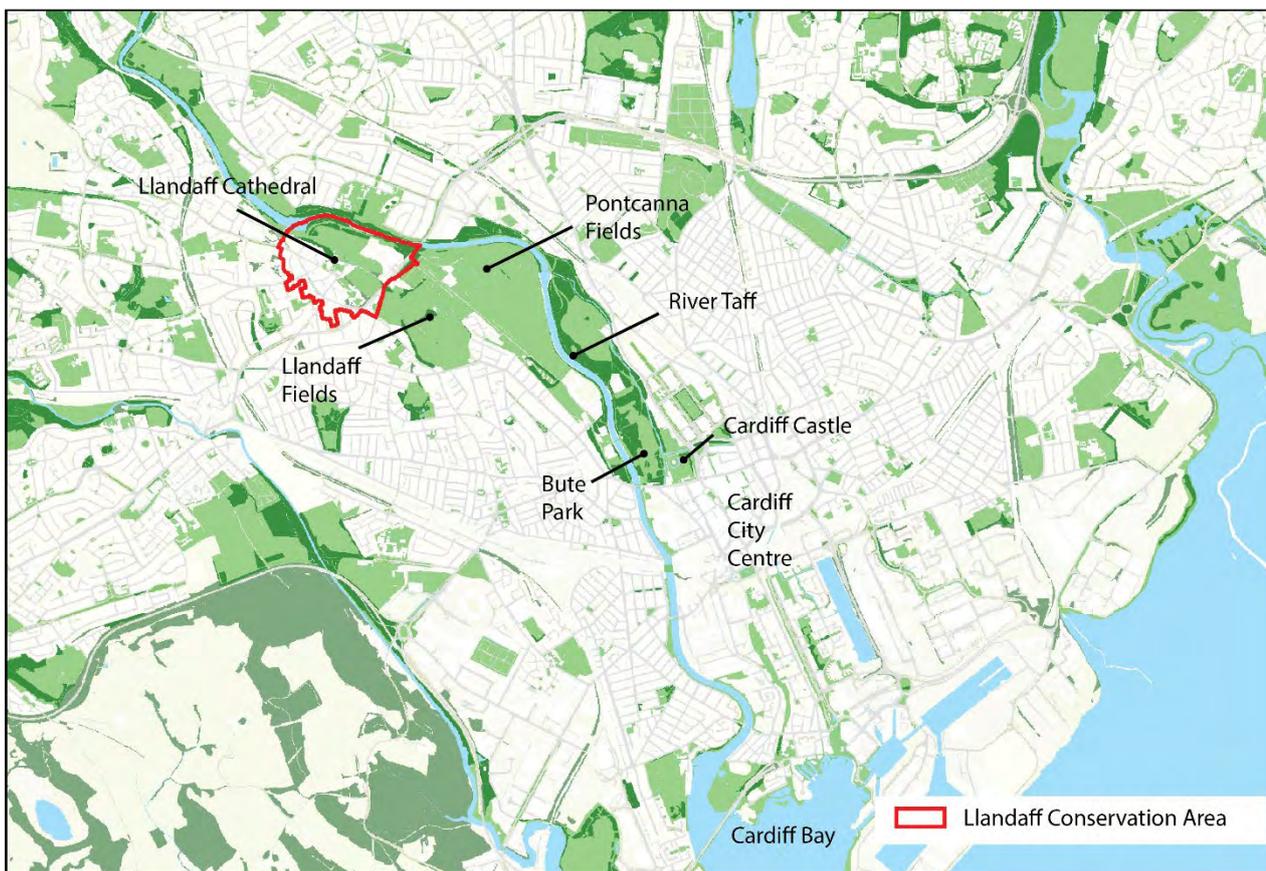
- Appraise the historic character of Llandaff;
- Identify those elements of Llandaff which contribute to its character;
- Identify elements which detract from the character;
- Propose measures to maintain or improve the positive character, local distinctiveness and sense of place;
- Identify opportunities and priorities for action to provide the basis for a more detailed management plan;
- Analyse the policy and management needs of the area;
- Assess the effectiveness of current planning controls;

- Identify the need for supplementary protection;
- Identify ways in which special character can be preserved or enhanced;
- Identify whether Article 4 Directions are applicable;
- Ensure controlled and positive management of change that encourages economic vibrancy and social and cultural vitality that accords with the area’s special architectural and historic qualities;
- Ensure that where there are buildings that make no positive contribution or detract from the conservation area, their replacement are of high quality design that enhances the area.

### 1.3 Llandaff Conservation Area

Llandaff is one of 27 currently designated conservation areas in the city. It is adjacent to the River Taff in an elevated position, which was fundamental to the siting of the first settlement. Llandaff is approximately two miles away from Cardiff city centre and the landscape setting to the east forms part of an important network of green spaces through the city.

Map 1: Llandaff in Cardiff city context



The Llandaff Conservation Area recognises the historic value of this ‘city within a city’, which was its own entity until 1922 when Cardiff extended its boundaries. The area still retains a village atmosphere close to the cathedral, which includes a village green, a memorial and a cross, terraces, cottages and a high street. The village was built on a rock outcrop next to the River Taff and includes some steep topography. The change in levels from the Cathedral Green down to the Cathedral adds to the unique sense of place and provides a dramatic setting for the Cathedral.



Photos around the Cathedral Green

## 1.4 Boundary Review

### 1.4.1 Boundary Extension

The 2006 boundary of the conservation area was reviewed and revised to be extended to the west to include 'The Avenue' and ten additional buildings along Fairwater Road.

This area includes a number of high quality detached and semi-detached buildings which date to the early 1900s. They typically include grand gable-fronted bay windows and terracotta brick detailing mixed with white render. Whilst 'The Avenue' itself was developed after the core of the conservation area, the street layout ties in logically behind Cardiff Road, next to Rookwood Hospital. It is regrettable that one characterful building in the street has recently been demolished for infill development, however, inclusion within the Conservation Area will enable change to be managed more effectively. It is proposed that an Article 4 Direction be served for this new area, with controls similar to those described in Section 7.



Fairwater Road contains some remarkable locally listed buildings and positive contributors set within large plots.



The Avenue contains a number of high quality early C20<sup>th</sup> white rendered houses with terracotta brick, clay tiled roofs, hung tile detailing and gable fronted bay windows. There are also buildings with black half-timbering and bay windows, such as this 3-storey villa.



### Summary of the change to the boundary

The western boundary has been extended to include The Avenue, Nos. 1a-13 (odds) and Nos. 2a-16 (evens) and Fairwater Road Nos. 3a-7 (odds), Nos. 6-16 (evens) and Nos. 15 and 17.

Map 2: Boundary as designated in 2020



### 1.4.2 Boundary retention

A brief review of the historic and architectural character of the Conservation Area suggests:

1. The Conservation Area provides protection for the delicate landscape surrounding the Cathedral, the river and Llandaff Fields.
2. The continued inclusion of the Cardiff Metropolitan University (formerly UWIC) and the landscape around the buildings can maintain and emphasise the educational role that links the college to Llandaff. The views of the Cathedral from Western Avenue are important, as is the historic avenue of trees, which, during the 19<sup>th</sup> century were an integral part of a riverside walk between the grounds of Cardiff Castle, Bute Park and Llandaff Cathedral.
3. The retention of Fordwell Close, Bruton Place and Mitre Place provides a well-defined urban edge to the conservation area. They provide a transition from higher density terraced housing to the south and the wooded hillside to the north.
4. The retention of The Crescent, the siting and layout of which is determined by historic field boundaries and the former Mill Lane (see 1901 map). When Western Avenue was built in the 1930s, it created a triangular area of land between Cardiff Road and Mill Lane, on which The Crescent sits. It is acknowledged that the scale and architecture of The Crescent is not sympathetic to the historic character of the conservation area. However, the building is relatively well-screened by mature trees, which add to the landscape character.
5. The continuity of the existing boundary line at the south around Western Avenue, Palace Avenue and the grounds of St Padarn's Institute (formerly St Michael's College), which was defined by the survey work for the 2006 Conservation Area Appraisal.

### 1.4.3 Photo survey of changes

Photographic surveys were undertaken in 2004 and late 2017. For the purpose of this appraisal, brief assessments have been made of the following:

1. The overall change in character and appearance for each building within the whole conservation area between 2004 and 2017. Any alterations to properties and their boundaries evident in 2017 were considered to either enhance, preserve or harm the character of the area. Properties that remained materially the same were considered to preserve the character of the area.
2. The impact of alterations to properties and their boundaries between 2004 and 2017. The types of alterations assessed include window and door replacements, boundary changes, chimneys, satellite dishes, rooflights, painting, roof materials, dormer windows, loss of garden space, adverts/shopfronts and significant repairs or maintenance undertaken.

Based on these findings, it can be concluded that of the 327 properties assessed, 13% have been enhanced, 83% preserved and 3% harmed. Based on the 84 individual alterations observed, it can be concluded that 58% have enhanced the character of the area, 25% have preserved the character and 17% have had a harmful impact. This denotes that 83% of alterations are positive. It is acknowledged that the instances of harm can have a marked impact on their immediate area with a loss of architectural features. It is therefore important to ensure that people are aware of the special character of the area so that instances of harm are prevented in the future. A new Article 4 Direction has been put in place in 2018 to further control the partial demolition of boundary walls.

2004



2017



Spencer's Row: Seven of the eight houses have been enhanced with new more sympathetic vertical sliding sash windows. An unsightly porch canopy has also been removed. The eighth house has been preserved.

2004



2017



Cardiff Road: Enhancements since 2004 include a rubble boundary wall and railings with raised seating area and glazed doors, façade painting, painting of windows, window boxes, signage improvements and removal of advertising posters. The building now appears better proportioned, with increased vertical emphasis. The building is a positive contributor.

2004



2004



2017



Bridge Street: The addition of a satellite dish on the ground floor is harmful to the conservation area. However, the painting, maintenance, removal of alarm case box, reduction of wiring and removal of antennae on the roof offer an overall improvement.

2017



Bridge Road: The addition of conspicuous rooflights has harmed the character of Conservation Area.

#### 1.4.4 Enhancement Projects

Enhancement Projects undertaken since 2006 include the High Street public realm improvements (2012), restoration of the Prichard Bridge (2012) and repair and interpretation work at the Bishop's Palace (2011 onwards).



High Street redesign, resurfacing, new trees and street furniture



Prichard Bridge (2013) Restoration project.



Bishop's Palace (2012) survey work, vegetation removal, repairs and interpretation

#### 1.4.5 Summary

A review of the conservation area boundary and its immediate surroundings has confirmed that the area still has a special character. Overall, buildings of special historic and architectural value and the public realm have in the main been protected or enhanced as a result of designation.

## 2.0 Planning Policy Context

### 2.1 UK and Welsh Legislation

Conservation areas are governed under the Planning (Listed Buildings and Conservation Areas) Act 1990.

The Historic Environment (Wales) Act 2016 makes some changes to the 1990 Act so that it is specific to Wales and its historic environment. The Act also amends the Ancient Monuments and Archaeological Areas Act 1979. The three main aims of the Historic Environment (Wales) Act are listed by Cadw as follows:

- To give more effective protection to listed buildings and scheduled monuments;
- To improve the sustainable management of the historic environment; and
- To introduce greater transparency and accountability into decisions taken on the historic environment.

National Planning Policy is set out in [Planning Policy Wales \(PPW\)](#). This provides the overarching national strategic guidance with regard to land use planning matters in Wales and includes a section on the conservation of the historic environment. It sets out clear statements for development management in conservation areas. This policy is supplemented by [Technical Advice Note \(TAN\) 24: Planning and the Historic Environment \(May 2017\)](#), which gives advice on conservation area reviews, noting that a conservation area appraisal is the foundation for any proposals for preservation and enhancement (para 6.4).

### 2.2 Local Planning Policy

Policy on built heritage specifically relevant to Cardiff can be found in the Local Development Plan (2006-2026) policies *KP17: Built Heritage* and *EN9: Conservation of the Historic Environment*.

LDP Paragraph 5.150 states that *'the Council will continue to review its conservation area designations, boundaries and CAAs as required and against recognised national criteria in PPW and Circular 61/96, in addition to those characteristics identified within the approved Conservation Area Strategy (Sept 1997) to determine whether an area is of special interest'*.

Policy EN9 states that development relating to conservation areas will only be permitted where it can be demonstrated that it preserves or enhances the area's architectural quality, historic and cultural significance, character, integrity and/or setting. Paragraph 5.148 notes that in the assessment of planning applications, the Council will wherever feasible seek to enhance the special character of each area as defined and promoted by the adopted Conservation Area Appraisal.

### 2.3 Other Guidance

Cadw have produced the publication *Managing Conservation Areas in Wales (2017)*. It advises that the structure and content of a conservation area appraisal should be comprehensive and meet key aspects of good practice.

## 2.4 Consultation and Adoption

A review questionnaire was distributed to the Llandaff Conservation Group in 2017 which helped to inform this Appraisal, together with an ongoing dialogue leading up to the consultation undertaken from November 2019. The draft Appraisal was subjected to a nine-week consultation period. Consultation responses were generally positive and supportive of the proposed extension. No comments were received opposing the extension. Detailed comments were received from the Llandaff Society.

A full report on the consultation responses and rebuttals or subsequent amendments made to the documents is part of the background documents considered at the Cabinet meeting.

This appraisal was adopted by the Council's Cabinet at the meeting held in September 2020.

Cabinet papers are available at the council's committee meeting pages at [www.cardiff.gov.uk/ENG/Your-Council/Councillors-and-meetings](http://www.cardiff.gov.uk/ENG/Your-Council/Councillors-and-meetings).

## 3.0 Historic Significance

### 3.1 Summary of Significance

This brief history of Llandaff has been informed by the Llandaff Conservation Group and contains references to “Llandaff Past and Present” by John B. Hilling (1978). The key elements are its:

- Strategic location in the valley of the River Taff;
- Centuries of ecclesiastical development;
- Expansion from a pilgrimage and market town to an affluent residential area;
- Retention of the green spaces and historic monuments at its core;
- Development as an educational hub and residential suburb with a busy local centre.

### 3.2 Llandaff’s Historic Background

The origins of the settlement date back to pre-history. It held a strategic location on a rock outcrop forming the nearest piece of dry land to the sea, overlooking to the east an area of marshy grassland and the lowest fordable crossing point of the River Taff. In Celtic times, an early Christian enclosure “Llan” with a church or saint’s cell was established on the spring line near the river crossing on the east-west pilgrimage route to St David’s and north-south to St Mary’s Well, Penrhys.

Llandaff’s importance grew in the 12<sup>th</sup> century when it was chosen by the Norman rulers as their Bishop’s seat. The cathedral, the Bishop’s Castle and ruined Bell Tower are all a mark of Llandaff’s early importance, defining it as a distinct and separate neighbour to Cardiff, still a small port and town.

Its development slowed from the 16<sup>th</sup> to 18<sup>th</sup> centuries but gathered pace in the 18<sup>th</sup> and 19<sup>th</sup> centuries with the development of gentry houses and a major revival of the Cathedral (Map 8).

From then on, development took three forms:

- Fine architecture for church purposes;
- Substantial but simple public houses and commercial buildings;
- Domestic buildings of varying scale and impact.

Cardiff Road formed the limit to the early organic development of the village, as can be seen in Map 4 (1869). The area slowly progressed by means of replacement and infilling, and the introduction of small Closes such as Penedre and Spencer’s Row. During the 1920’s, the area expanded to the west (Map 7 (1920)). One of the first streets to be built included ‘The Avenue’, together with some large dwellings along Fairwater Road; these properties being included with the conservation area from 2020 onwards.

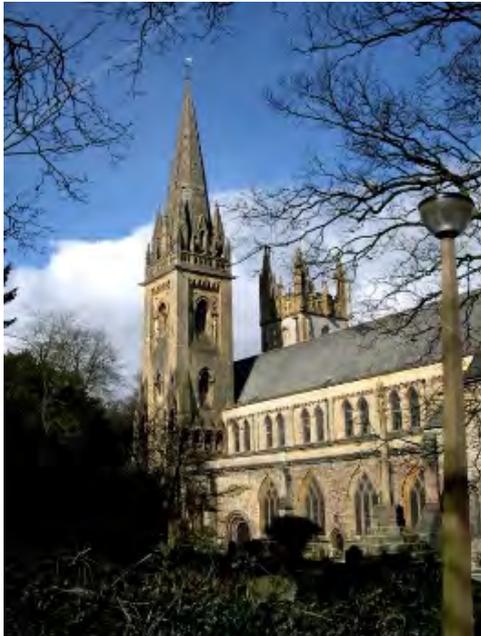
After the 1920s, the settlement grew further to the west, spreading to join the rapid expansion of Cardiff that occurred in the early part of the 20<sup>th</sup> century. The pattern of buildings and townscape has matured, extending to include post-war streets such as Cathedral Close, Pavin Court and Mitre Court.

### 3.3 The Architectural and Historic Importance of Llandaff

This brief history shows that the city of Llandaff evolved in an organic fashion along a medieval street pattern. In the nineteenth century, although most streets were already built up, many properties such as

the Deanery and Black Hall were rebuilt. The mixture of architectural styles throughout the whole village reflects this slow evolution and the settlement's close but contrasting relationship to the neighbouring city of Cardiff.

Despite the increasing demands of modern life, this 'city within a city' retains its timeless quality with stones that reflect ancient spirituality and power. These unique attributes resulted in the choice of Llandaff as Cardiff's first designated conservation area in 1968.



Llandaff Cathedral (south)

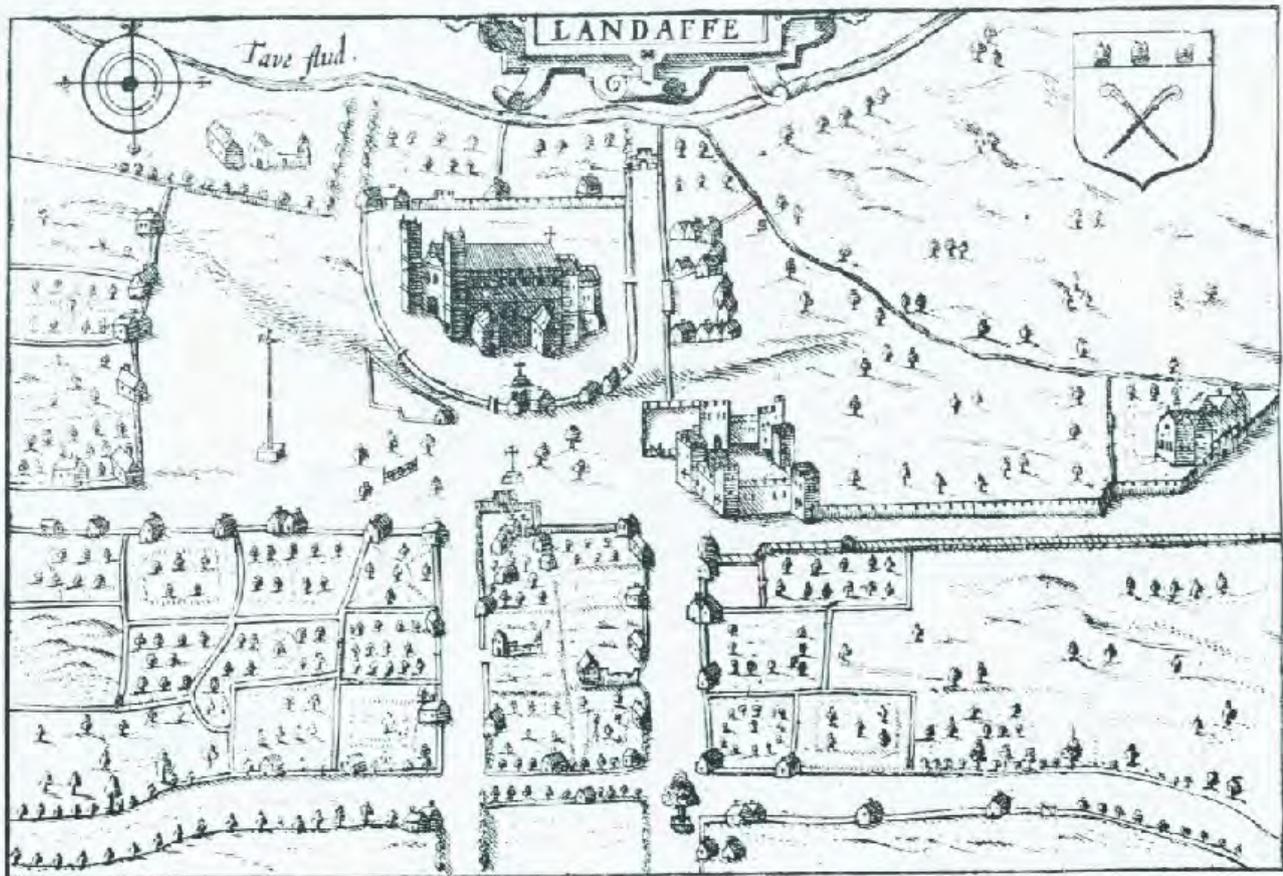


Bishop's Palace



Cathedral (north)

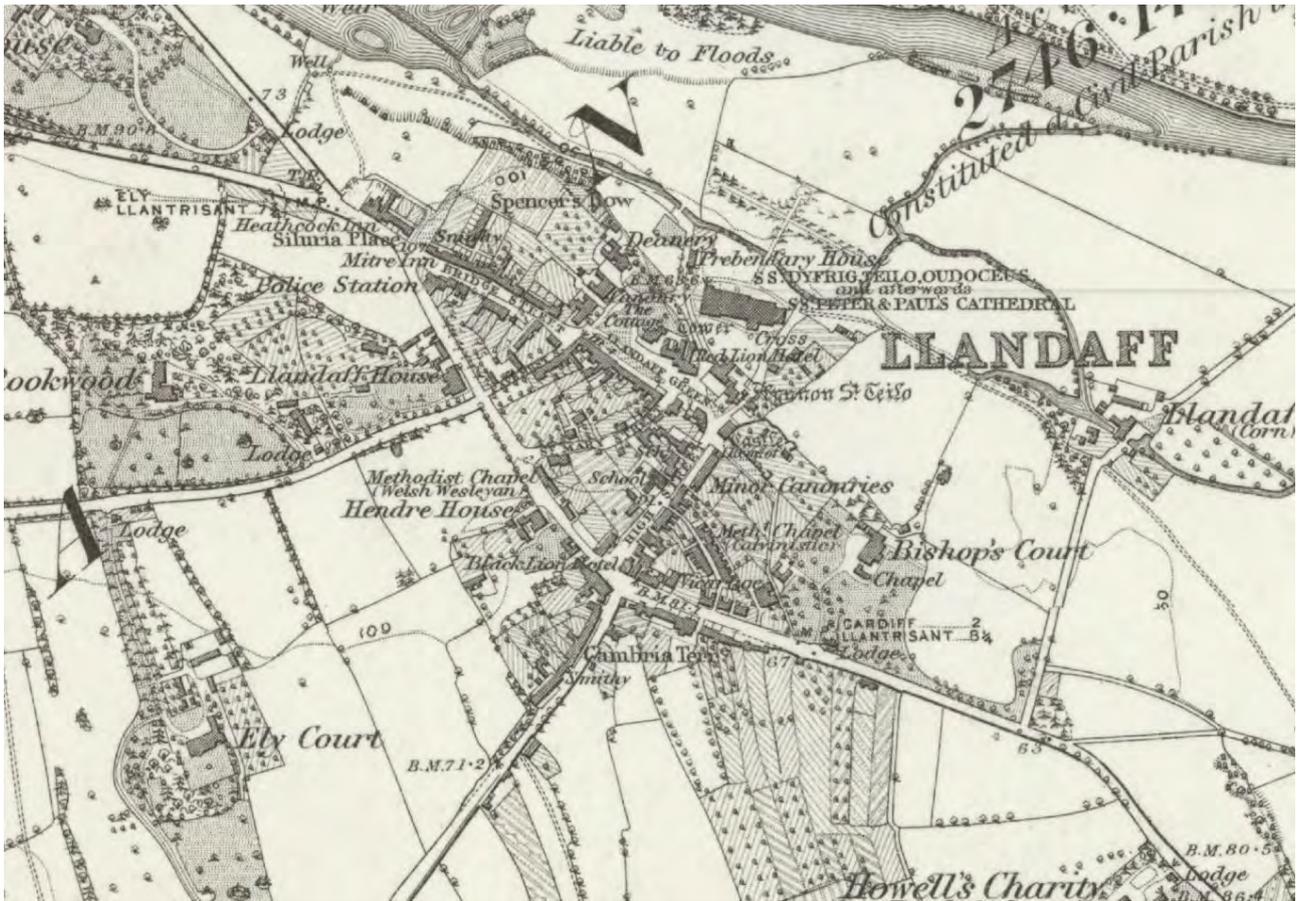
Map 3: Llandaff, 1610, John Speed's Map



Map 4: Llandaff, 1869



Map 5: Llandaff, 1886



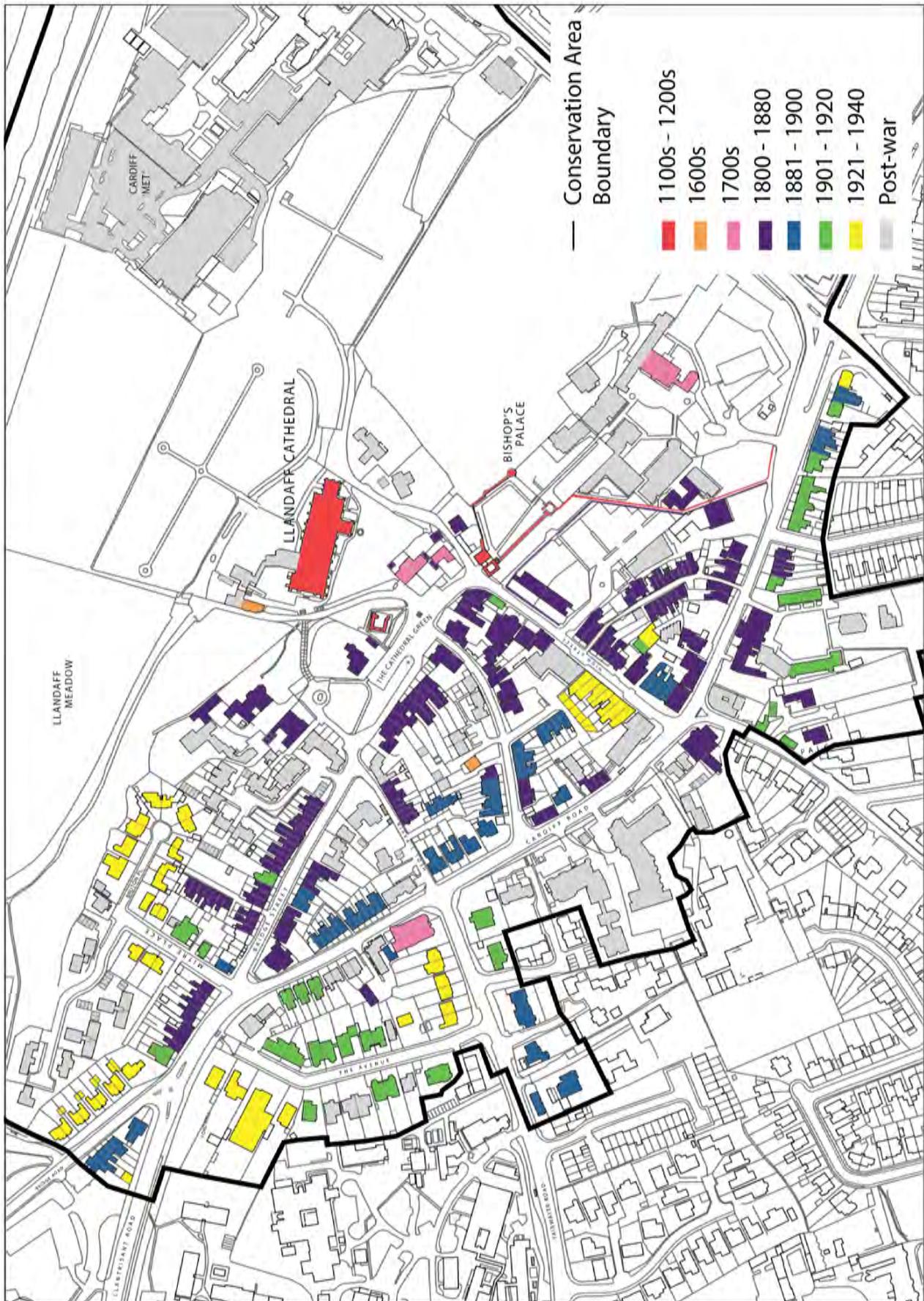
Map 6: Llandaff, 1901



Map 7: Llandaff, 1920



Map 8: Llandaff Development Through Time



## 4.0 Character Assessment

### 4.1 Appraising Character

A range of criteria for appraising character when designating new conservation areas were identified in the Cardiff Conservation Area Strategy in 1997. The same criteria can be used to reappraise special historical quality. The purpose of the criteria is to create a useful and consistent format for each conservation area appraisal to follow in the city. The criteria in the relevant sections has been expanded to follow current Cadw advice where necessary:

- a. **A distinctive quality of place** (history of the area, grouping of buildings, whether listed or not, scale and relationship with outdoor space);
- b. **The presence of landmark buildings or landscape features** (whether some buildings and tree groups are of major significance, whether they form vistas or focus points or background elements);
- c. **Hierarchies of public or private space** (combination of spaces such as public gardens, streets and squares through to clearly defined private areas and gardens which contribute to distinctiveness of place);
- d. **High quality local or unusual materials in the townscape** (on buildings, garden walls, railings, roofs, façade treatment and paving);
- e. **High quality architectural detailing** (windows, doors, eaves and generally areas where original features have been retained);
- f. **High quality hard and soft landscaping** (types of pavements, kerbs, street furniture and trees in both public and private areas).

The following analysis has drawn on work by the Llandaff Conservation Advisory Group undertaken for the 2006 Conservation Area Appraisal and is supplemented where relevant.

#### a. A Distinctive Quality of Place

A history of the area has been covered in the previous chapter and the remainder of the criteria that make up the distinctive quality of place are as follows.

##### 4.1.1 Groupings of Buildings

- The core group of listed buildings are centred around the Cathedral Green. These include stand-alone landmark buildings of medieval origin, such as the Cathedral, the Bell Tower and the Bishop's Palace. Some 19<sup>th</sup> century listed buildings on the Green are detached;
- Most other buildings are grouped together;
- The locally listed buildings and positive contributors comprise of a range of detached, semi-detached and terraces. The majority of the conservation area is of a tight urban grain with a terraced formation;
- Building lines are varied, some houses are set in gardens, others behind forecourts;
- Building groups rarely exceed four houses, creating variety in style and decoration;
- Dormers and gables create strong vertical accents to the skyline.

##### 4.1.2 Designated Historic Assets

There are two scheduled monuments and numerous nationally and locally listed buildings within the conservation area; the highest concentration is around the Cathedral Green area, reflecting its significance.

The grade II\* registered Historic Park and Gardens (Pontcanna Fields and Llandaff Fields) overlap with the fringe of the Conservation Area on the north-east. Rookwood and Insole Court are outside the Conservation Area but included on the Register of Historic Parks & Gardens; their character is more self-contained within site boundaries. The Historical House and Gardens of Insole Court comprise in themselves a Conservation Area including listed buildings, structures and gardens featuring preserved trees.

There are a number of tree preservation orders (TPOs) and most of the conservation area falls within the Llandaff Archaeologically Sensitive Area (see Archaeology and Archaeologically Sensitive Areas SPG, 2018). The River Taff and its banks fall within a Site of Importance for Nature Conservation (SINC).

#### **4.1.3 Hidden Histories**

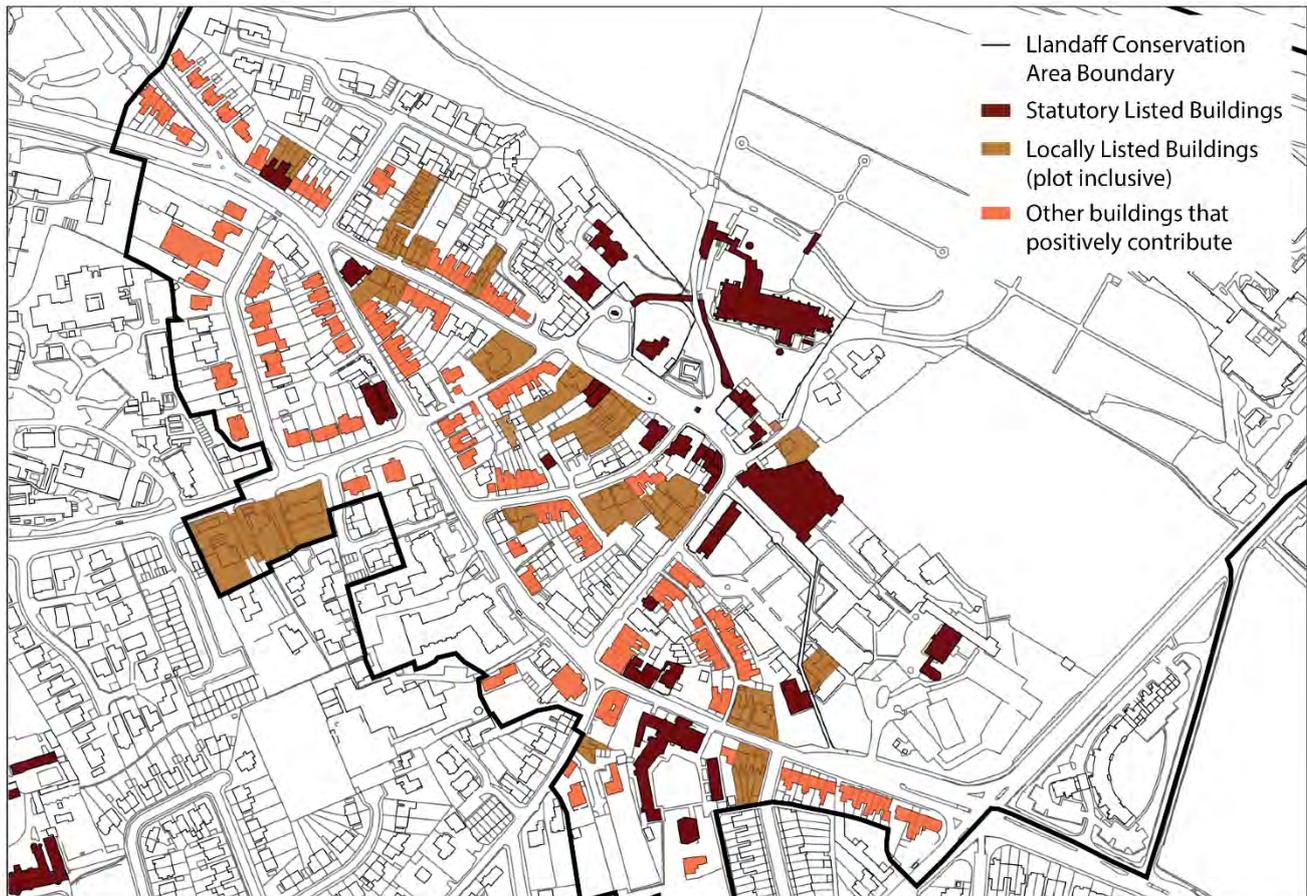
Llandaff has a large Archaeological Sensitive Area, where isolated finds from the Romano-British era, such as building material, pottery and coins, have been discovered. More information can be found in the Archaeology and Archaeologically Sensitive Areas SPG.



#### 4.1.4 Positively Contributing Buildings

In addition to the historic designations, the conservation area contains a number of other buildings, which have held no formal historic designation to date. Current Cadw guidance asks local authorities to identify buildings that positively contribute to the character of a conservation area. These buildings are identified accordingly on the Positively Contributing Buildings map (alongside the Statutory Listed Buildings and Locally Listed Buildings, which positively contribute by virtue of their formal designation). Photos of typical buildings can be found under criteria 'e': High Quality Architectural Detailing.

Map 10: Positively contributing buildings



Most buildings positively contribute to the character of the conservation area and the Council will work to promote the preservation and enhancement of these buildings through the planning process. Many of these 'positive contributors' (aside of the Listed and Locally Listed Buildings) are dated between the mid-18<sup>th</sup> century and 1920, and a few dated circa 1940. The buildings that positively contribute vary in quality; some are in excellent condition with traditional features maintained, whereas some have the potential for improvements, e.g. enhanced windows, the reinstatement of sensitive boundary treatments or additional maintenance.

The uncategorised buildings are either neutral or might be considered to detract from the character of the conservation area. There may be scope for these buildings to be markedly improved, or there may be future redevelopment opportunities if conservation area consent is granted. The buildings that fail to contribute positively are typically post-war.

Llandaff High Street is overall a successful environment and of a scale that juxtaposes well with ancient buildings as it leads to The Green. The use of external lamps to light signage helps to maintain a special atmosphere. However, the street contains some post-war buildings (even Nos. 48-52 and Nos. 18a-18d) which fail to contribute to the street. These buildings utilise insensitive materials, projecting box windows with horizontal emphasis and wide box gutters that appear clunky and heavy. Street Nos. 48-52 contain a flat roof (corner of Cardiff Road) which does not relate to its neighbouring buildings well. The middle section of the north side of High Street (even Nos. 20-46) does contain some positive characteristics, such as the scale and proportions, the tight urban grain, the steep roof pitches, the ornate brick chimneys, the large windows with vertical emphasis, traditional brick work, clipped eaves, and the way in which the buildings step up the street with the rising slope. However, detracting features include crudely applied half-timbering, modern windows and some insensitive shop front treatments. It is therefore considered that these buildings are neutral.



9 High Street



25 High Street



13-15 High Street



19 High Street

Positive contributors on the south side of High Street



20-22 High Street



36-38 High Street



18 High Street

Even Nos. 20-46 on north side of High Street are sympathetic and traditional in scale and form, however detailing is not reflective of the standard elsewhere in the Conservation Area and overall make a neutral contribution.

Buildings on the north edge of High Street (even Nos. 18a-d and 48-52) considered to not positively contribute to the Conservation Area.

#### 4.1.5 Scale

The vast majority of buildings in Llandaff are between two and three storeys. Until the mid-19<sup>th</sup> century, Llandaff's secular buildings were of a modest scale and even the few three-storey buildings were quite small. This can be seen at the top of High Street where no.6 (white-painted plain rubble three-storey) adjoins a two-storey corner building (Nos. 2-4).



Top of High Street - an earlier low three-storey adjoins a later 2-storey building.



Half-dormer window, Heol Fair.



Mid-19<sup>th</sup> century, 2.5 storey grand building.

Historic photos show that houses with upper floors lit by half-dormer windows were common. A few survive today at Penedre, at 6-14 and 7 Heol Fair and 78 Cardiff Road.

The buildings which transformed the character of Llandaff from market town to Cathedral City in the mid-19<sup>th</sup> century were designed on a much grander scale, and retain this visual prominence in the townscape today.

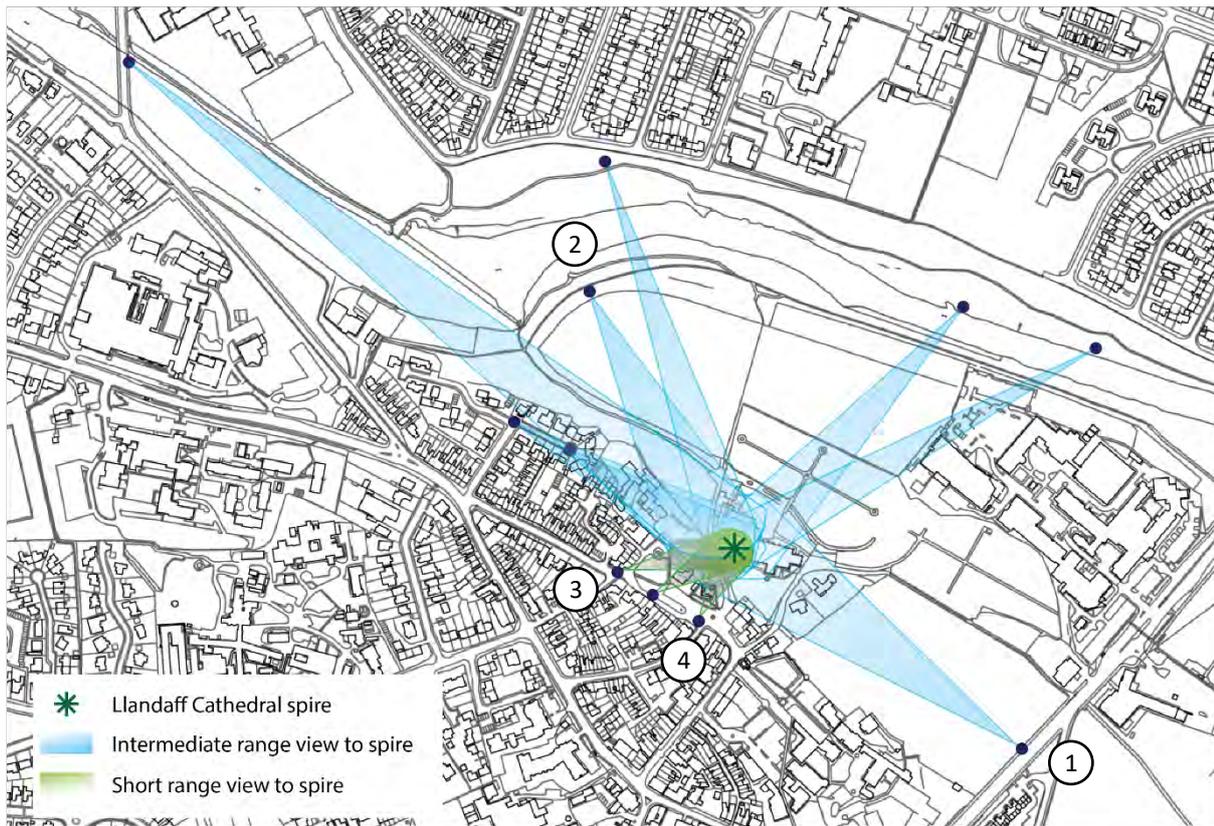
#### 4.1.6 Views and Vistas

There are a number of important views to the Cathedral spire from local (short-range) view points within the Cathedral Green, as well as more intermediate views in surrounding streets.

Views that are more distant are usually subtle, revealing only parts of buildings. There are some long-range views where the spire can be glimpsed and it creates an important wayfinding marker when travelling through the wider area. Views of the Cathedral spire and tower can be experienced / glimpsed from Llandaff Fields, or across the Arls Field from Llandaff Bridge, or the crossing of Cardiff Road, adjacent to Llandaff House.

One highly significant view of the Cathedral can be found from Western Avenue, across the playing fields. Only this distant view shows most of the Cathedral building (as opposed to only its spire). This view is the one by which newcomers first become aware of the setting of the Cathedral and its long and varied history.

## Map 11: Views to Llandaff Cathedral



A selection of short-range and intermediate views to the Cathedral spire. The Cathedral enhances the historic town space, provides a central focus to the area, provides vistas at the ends of streets and helps wayfinding.

Just as important are the views from within the Conservation Area outwards, such as from the Cathedral precinct and from the surrounding open spaces, For example, there are views to the Cardiff Metropolitan University from within the Conservation Area. The views towards the open spaces, such as the River Corridor and towards Llandaff Meadow and Llandaff Fields add to the character of the Conservation Area. The views from the Cathedral Green towards the winding paths that disappear from view, towards the open spaces are significant. Any development proposals need to be carefully considered so that they preserve or enhance the atmosphere of the Conservation Area from many viewpoints.

Llandaff Conservation Area retains much of its medieval character. In terms of townscape, the pedestrian experience is very rich. There is contrast between narrow streets, such as Chapel Street, Heol-y-pavin and Heol Fair, where the Cathedral is hidden from view, in contrast to the opening out of the vista of the Cathedral in the open space of the Cathedral Green. There are vistas to buildings and gables as pedestrians move from space to space along streets. This is formed with a combination of curves in the road, street narrowing, a strong form of enclosure, key buildings at the end of streets, building placement and scale. Stone walls and soft landscaping all, both in private gardens and public spaces, add to the character and interest.



Narrow streets, Heol-y-Pavin (left) and Chapel Street (right) with strong enclosure and stonework.

Characterful archway entrance to Spencer's Row that retains building frontage along the street.

#### 4.1.7 Patterns of Use

Llandaff currently retains some of the functional character of a small town. It is a busy area that is well connected by roads and bus. Train stations are less accessible, typically between a 15-25 minute walk (Waungron Park, Fairwater, Danescourt and Llandaff).

The area is mainly residential, with a high street, schools, and colleges. The High Street includes shops, cafes, restaurants, offices and other uses. This mixed used character brings vibrancy to the area. In the wider area, the BBC Wales Headquarters provides a significant employment use, but is moving to Cardiff City Centre from 2020. The site has permission to be redeveloped for housing.

Llandaff is the seat of a Bishop in the Church of Wales whose diocese stretches from Bridgend in the west to the eastern edge of Cardiff, and from the Bristol Channel in the south to Merthyr Tydfil in the north.

The rich complexity of mixed land uses, connectivity and attractive environment means that Llandaff is a popular destination for many visitors.

## **b. The Presence of Landmark Buildings and Landscape Features**

The most significant buildings in Llandaff are those associated with the Church in Wales.

The other landmark buildings are rich and colourful, of a grand scale on prominent sites and tend to have an historic association with Llandaff. In addition to the ecclesiastical buildings, landmark buildings include The Cathedral School, Llandaff House, the Police Station and The Heathcock public house. The Police Station has been enhanced in recent years.

Landmark buildings are often set within a background of smaller two-storey houses (notably Chapel Street, Bridge Street and Heol-y-pavin). However, between the two extremes lies the greater amount of domestic building at 2.5 storey. Nearly all of this shows a unity of warm colours, offset by a variety of simple but rich detailing. The pair of house facades at 57-59 Cardiff Road is probably the best of this group.

The Cardiff Met complex is a landmark defining the eastern entrance to the area. Recent additions to its buildings and changes in exterior claddings, suggest awareness of the merit of integrating the whole complex in appearance and function with the rest of Llandaff.

Some woodland areas and trees form landmark features. Key ones are the woodlands on the scarp to the flood plain, formal tree avenues centred on Western Avenue at Cardiff Met, and individual trees such as the Cathedral Green plane. The Dean's wood was planted on the scarp in the 19<sup>th</sup> century. The longevity of tree features is a particular strength of Llandaff's character.

There are a number of single mature tree features around the Cathedral Green Area on both private and public land. The loss of any of these mature trees would potentially have a major adverse impact on the environment and street scene, so the Council will resist any proposals to remove the trees, or will require a replacement programme where their removal is essential (see Trees and Soft Landscaping, section 4.1.15).



The former police station is a landmark building on the Cardiff Road / Bridge Street junction.



The Heathcock pub on Llantrisant Road.



Cardiff Met on Western Avenue (formerly UWIC).



57-59 Cardiff Road

## **c. Hierarchies of Public and Private Space**

### **4.1.8 Open Space**

This section includes open, green and urban spaces at a range of scales, such as the wider landscaping setting, public gardens and streets, down to clearly defined private areas and gardens that contribute to

distinctiveness of place. Llandaff's open spaces are a key part of its character and have special historic significance with the spaces that surround the Cathedral.

#### 4.1.9 Wider Landscape Character

A band of green open spaces to the north and east of the Cathedral are vital for the character-setting of the conservation area and the Cathedral. These include the river corridor, playing fields, woodlands, footpaths, Llandaff Fields and allotments (see map below).

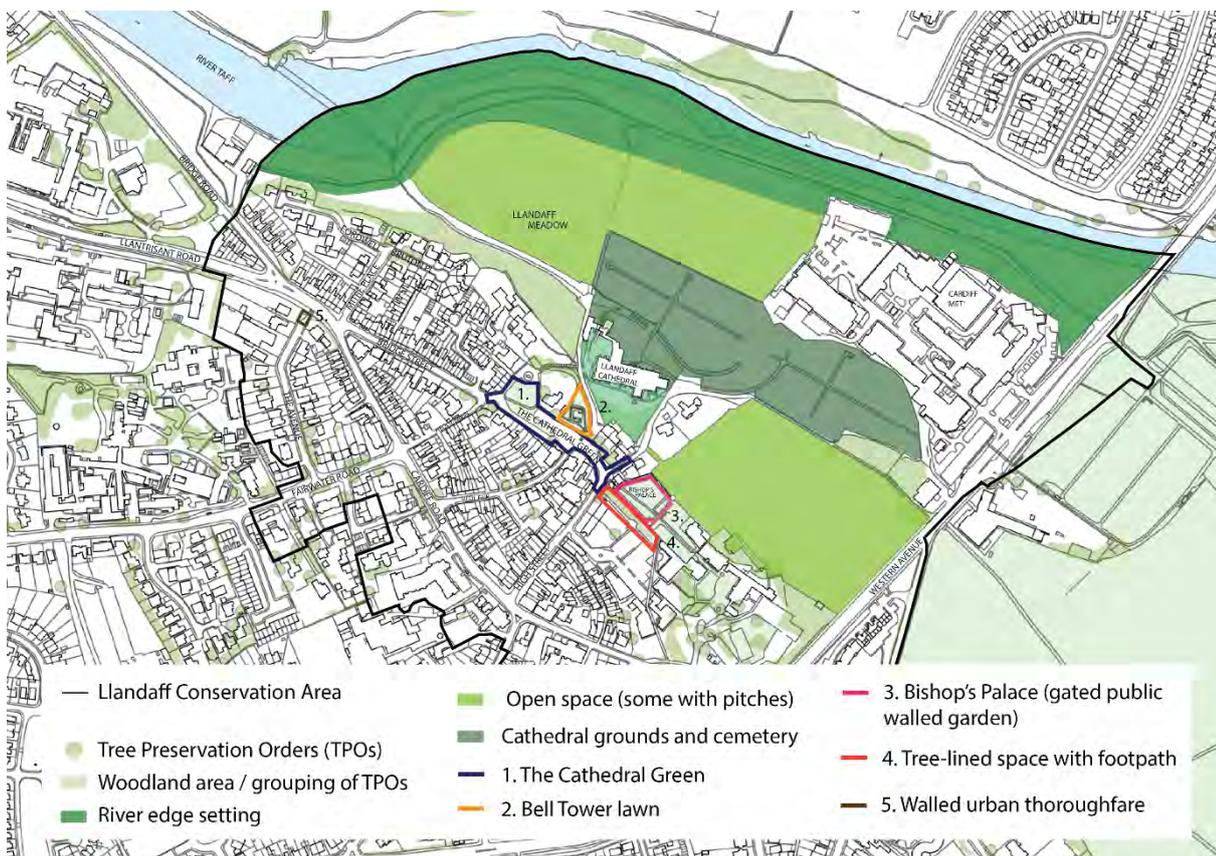
Outside the Conservation Area to the west, there are a number of historic gardens and spaces associated with buildings that add to the character of the wider area and form a green band (albeit interrupted at places), including Insole Court, Rookwood Hospital and the BBC Broadcasting House. When the Rookwood and BBC sites are redeveloped, it is intended that they will retain and maximise significant green infrastructure. The green band defines Llandaff visually and functionally on the west side.

#### 4.1.10 Open Streets and Spaces

There is an important ring of historic public spaces at the heart of the conservation area, close to the Cathedral. This collection of spaces define the essence of the historic built environment and the character of the whole community. They are identified on the map below as The Cathedral Green, the Bell Tower Lawn, the Bishop's Palace and a tree-lined amenity space with footpath. There is more information on the character of these spaces in Chapter 5.

Between The Avenue and Cardiff Road there is a walled urban thoroughfare for pedestrians which is included within the extended Llandaff Conservation Area boundary. This thoroughfare may have been created in earlier eras when Cardiff Road was enlarged and road usages changed. The area would benefit from regular cleaning and maintenance.

**Map 12: Open spaces that contribute to historic character**





The Cathedral Green.



Open space next to Cardiff Met.



Open space adjacent to Bishop's Palace.

#### 4.1.11 Networks of Routes and Public Spaces

The line of Ely Road, High Street and Cathedral Close may be of Roman (or even pre-Roman) origin; the route led past the Cathedral to a ford or a ferry over the Taff. The route used to be crossed at the top of High Street by another Roman Road leading from Cardiff to Llantrisant. This Road was diverted away from the Cathedral Green in the 18<sup>th</sup> century (to give privacy to the surroundings of Llandaff Court).

Cardiff Road, which bypasses the centre of Llandaff and its medieval market, may be a turnpike diversion of early 19<sup>th</sup> century date. Today, it gives the Green the quality of a Close, focused on the historical features such as the Cathedral, the Cross, the Bell Tower and the Old Palace.

Cardiff Road is currently an arterial road for vehicular movement. It is consistently busy throughout the day, but particularly congested at peak times. The road was historically important for movement between the city centre, Llandaff and Llantrisant, and remains so today. The high traffic levels mean that Cardiff Road is an Air Quality Management Area and creates significant noise.

The side streets and lanes off Cardiff Road, (Bridge Street, Heol-y-Pavin, Heol Fair, High Street and Chapel Street), all ultimately lead to the Cathedral Green with views of the Cathedral. This makes the area very legible and emphasises the cathedral as pivotal to the street layout.

Ongoing management is important in maintaining the tranquil quality of the conservation area and the Cathedral setting to the east. The Cathedral Green Area is contrastingly peaceful as it does not have any through-traffic. This limited vehicular access into the historic core is beneficial for the Cathedral setting and should be retained.

The pedestrian network within the conservation area (see Map 14, Pedestrian Connectivity) is permeable and well connected on the whole, with the exception of the post-war cul-de-sacs. Several historic streets, such as Cathedral Close, The Green and Western Avenue lead to footpaths along the River Taff. The footpaths and narrow streets form a significant part of Llandaff's character. Cathedral Close would benefit from maintenance to boundary walls, verges and kerbstones and improvements to parking, particularly access to disabled parking and ongoing parking enforcement.

The Cardiff Road / Bridge Road mini-roundabout is an area of conflict. This is a very busy junction and not easy for pedestrians to navigate. There are narrow pavements and little road space for cyclists. The historic built form constraints means that improvements are limited, but there may be some scope for changes.

On-road parking is a problem on many streets and on the Cathedral Green. This is caused by a mixture of residents, visitors and commuters and is due to a number of factors: an historic road layout that was not designed to accommodate the car, high density terraced housing, narrow streets, together with key mixed-use destinations, such as the High Street, the Cathedral and the Cathedral School. Sensitive improvements and a revised approach to parking would be beneficial.



Chapel Street was not designed for vehicles.



On-site artist's impression of street layout.



Lane beside Cathedral School.



Historic photo of Cardiff Road.



Footpath across the Green.

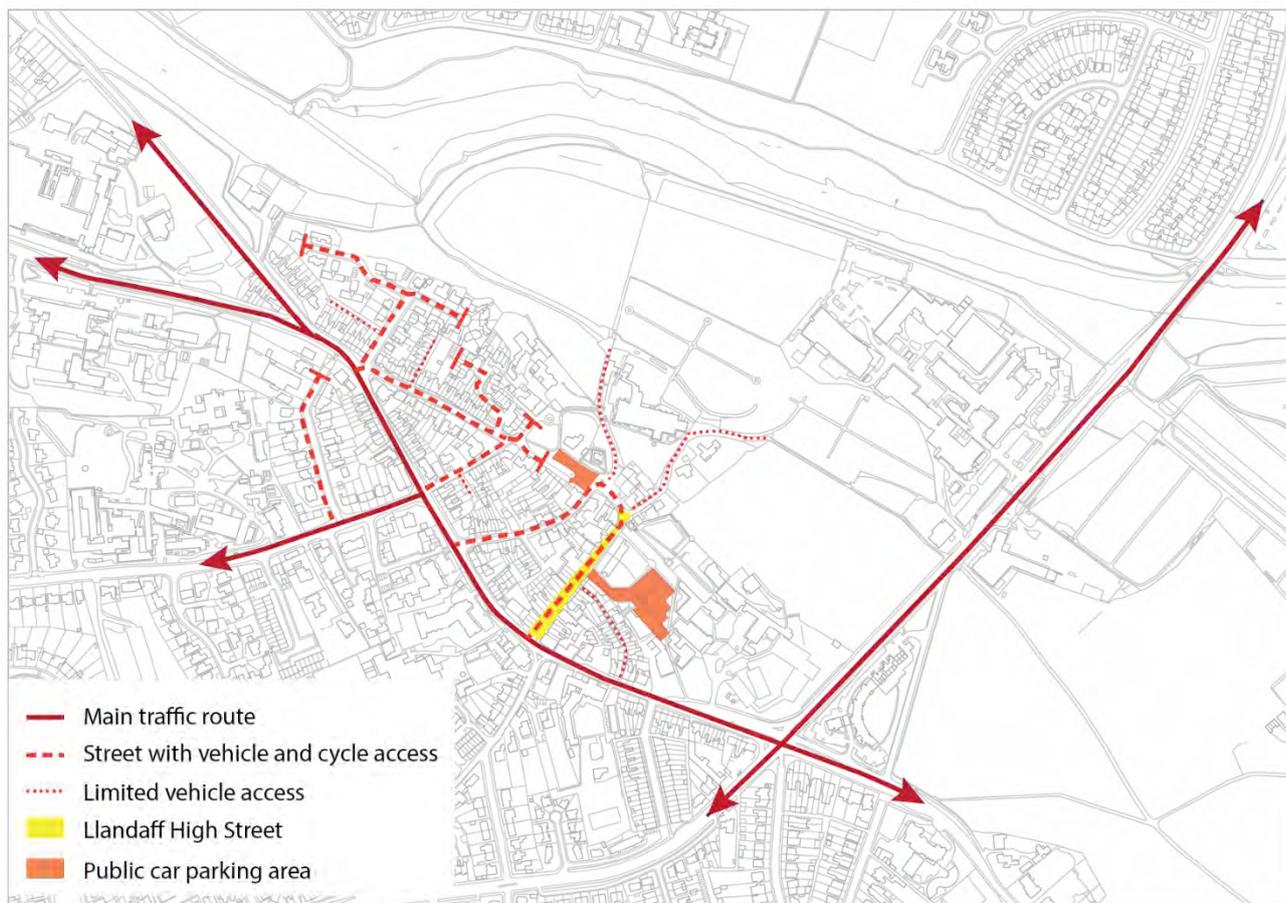


High Street / Cardiff Rd / Ely Rd

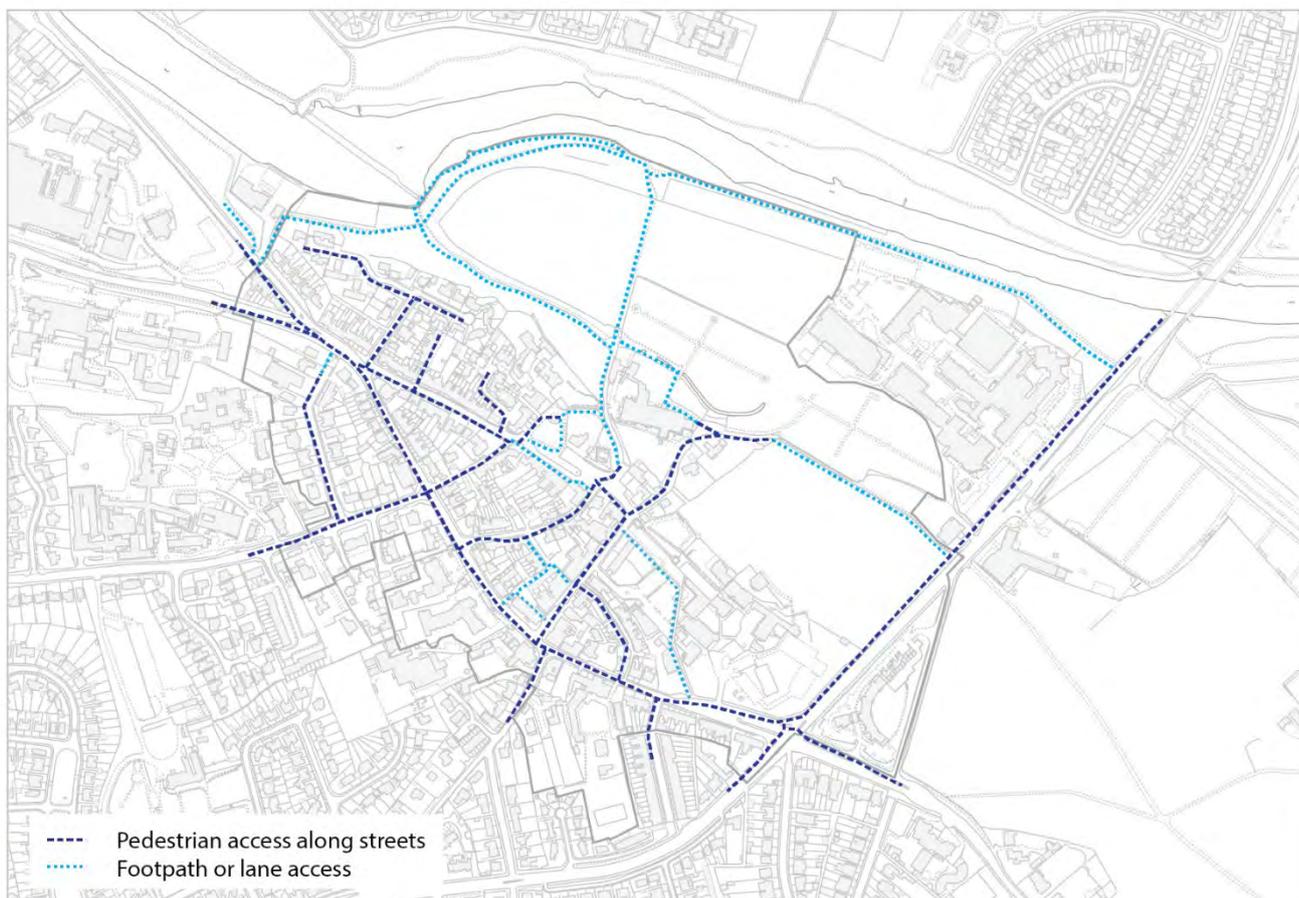
#### 4.1.12 Accessibility

Access for people with mobility difficulties is generally poor because streets are generally narrow and have unsuitable surface treatments. The 2012 public realm works to Llandaff High Street sought to create a better environment, with wider pavements and dropped kerbs.

Map 13: Vehicular and cycle access



Map 14: Pedestrian connectivity



#### d. High Quality Local or Unusual Materials in the Townscape

This section focuses on high quality materials for buildings. The later section (f.) on 'High Quality Hard and Soft Landscaping' covers more information on boundary treatments.

Most buildings of architectural ambition are faced in numerous types of stone laid in a variety of coursing patterns or as random rubble.

Brick does occur, occasionally in older work, such as 53-55 Cardiff Road, faced in gauged brick with fine joints, but it is mainly found in post 1920 buildings.

Architects for Cathedral houses and Diocesan buildings, such as John Prichard and Ewan Christian in the 1860s and later George Halliday, changed the use of decorative stone. They introduced much greater variety and artistry in stone colours and masonry. Bands of polychromatic polygonal work, often using rounded stones from all over the world were varied with thin slabs of grey Pennant stone. These were taken from the dump of discarded ballast in the docks. Smooth dressings of creamy Bath stone (now unfortunately often painted) are set beside knobbly pale grey lias from the Vale of Glamorgan or fine greenish grey Quarella stone from near Bridgend.

Llandaff is characterised by the stonework and the use of stone as the predominant facing material in humbler buildings are sometimes combined with yellow or red-brick door and window jambs. This use of facing stone continued up to the 1920s.

The few survivors of modest houses from the earlier 19<sup>th</sup> century are built mostly in lias stone rubble and simply limewashed. Rendering with lime-plaster and then cement-lime came later. Bright whites should be avoided where more traditional off-whites are more appropriate.

Late 19<sup>th</sup> century cottages show a move towards natural materials and finishes. Spencer's Row and the houses in front of it in Bridge Street show good use of the soft dark red Radyr conglomerate.

When rendering came back into use in the 1920s, it was usually roughcast, with a pebbled or stone chip surface thrown on. There are also many instances of the combination of smooth render with timber framing. On 20<sup>th</sup> century buildings, this is normally a purely decorative feature.

The Avenue is characterised by the use of clay tiles, white render and half-timber detailing.



Polychromatic semi-coursed stone with Bath stone ashlar dressings: High Street.



Polychromatic random rubble, pennant band courses, Staffordshire blue brick voussoirs and quoins: Heol-y-Pavin.



Random crossed Radyr stone facing with yellow brick quoins, voissiors and keystone: Spencer's Row.



Thinly coursed greenstone: Cathedral Green.



White render, terracotta clay tiles and bricks: The Avenue.

### e. High Quality Architectural Detailing

There is a variety of architectural styles and materials; the Green in particular has a huge variety of architecture. A high proportion of buildings have stonework facades, often richly decorated to enrich the face of both domestic and ecclesiastical buildings. A common decorative feature is toothed reveals to houses in bath stone or brick work in contrasting colours.

Surviving original architectural decoration is rare and precious in terms of its historic and visual interest. It is important to retain it where it exists. It can act as guidance or as an example of how to repair a similar feature elsewhere. For example, The Deanery retains a delicate fanlight over the front door and 66-76 Cardiff Road of c. 1910 form a particularly well preserved six-house terrace, retaining all of their cast iron and glass porches. Some properties on The Green have several sash windows, but without traditional upper sash transom 'horns'.

There are many good example of decorative fascias and barge boards throughout the conservation area.

The images that follow illustrate some typical examples of buildings that positively contribute to the conservation area. The architectural features, together with some boundary treatments and paving materials are highlighted and labelled.



Decorative bargeboard and grey slate roof, Cardiff Road.



Extended tiled porch feature, The Avenue.



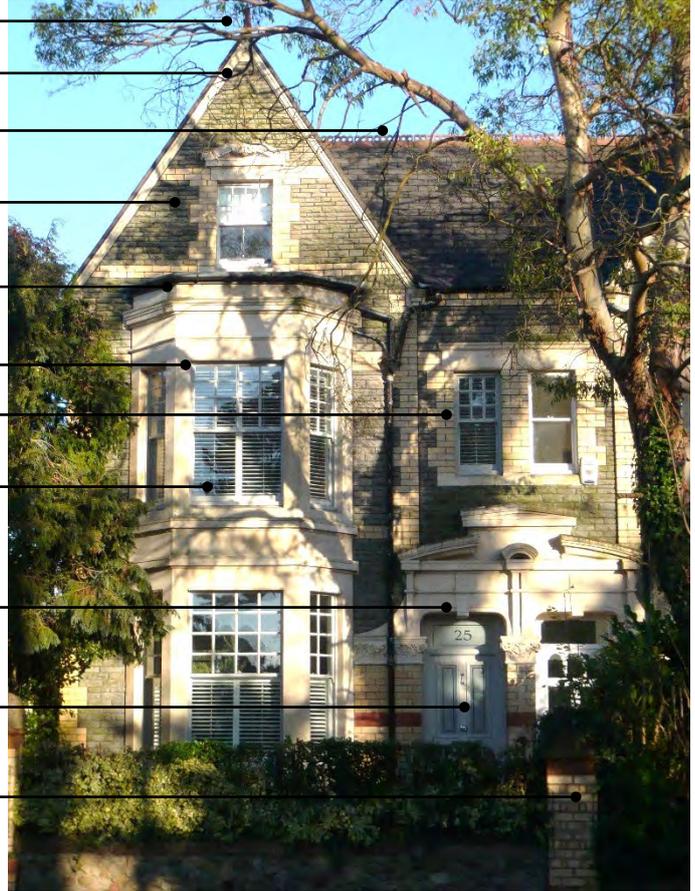
Cast iron and glass porches, Cardiff Road.



Decorative over-door carving and tiled path, Bridge Street.

## 25 Cardiff Road

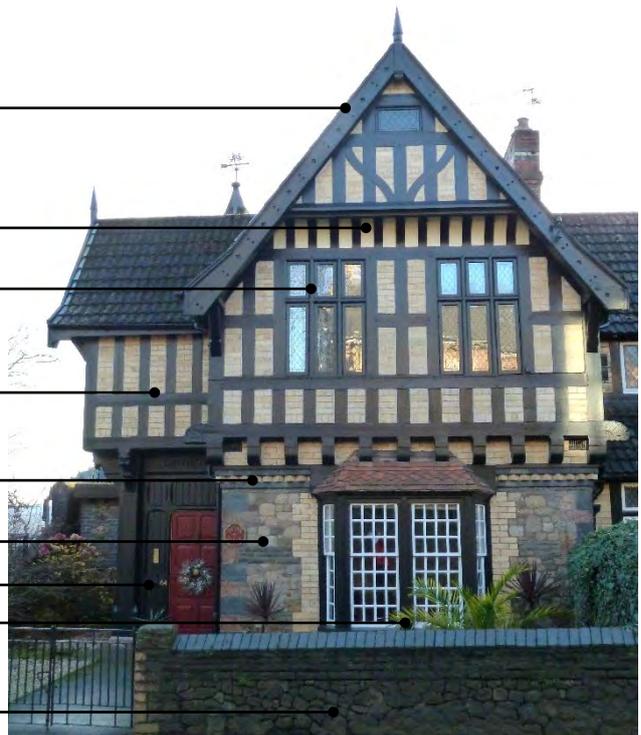
- Finial detailing.
- Steeply pitched gable.
- Decorative ridge tiles and slate roof.
- Fine coursed grey pennant facing stonework in diminishing courses.
- Decorative yellow brick work banding course.
- Bath-stone bay window.
- Brick quoins and detailing.
- Large timber sliding sash windows with vertical emphasis.
- Recessed porches.
- Decorative painted timber door.
- Stone dwarf walls with pillared entrance and hedge to front courtyard.



Three-storey with grand proportions and generous floor to ceiling heights, circa 1901.

## 64 Cardiff Road

- Ornate timber bargeboard with pointed finial and sprocketed eaves.
- Buff brick panels with applied black timber framing to first floor.
- Spacing of vertical window frames tie in with timber panelling to façade.
- First floor overhangs front door with ornamented brackets.
- Ornate brickwork pattern banding with rotated projecting header - bricks, in contrasting colour.
- Multi-coloured, multi-sized stone work to ground floor.
- Timber panelling surround to doorway.
- Bay window with red tiles and timber frames.
- Boundary wall with polychromatic polygonal stone work and angled coping bricks.



End 19<sup>th</sup> century, likely architect George Halliday. Style of half-timbered Tudor domestic architecture.

## 70 Cardiff Road

- Red-brick chimney.
- Terracotta ridge tiles.
- Grey slate roof.
- Gable over bay window with vertical timber striped detailing, timber bargeboard and dainty finial.
- Bath stone features include: horizontal banding, bay windows and quoins to window and door reveals.
- Red facing brick.
- Iron and glass bracketed porch with detailing (found at Nos. 66-76 Cardiff Road).
- Painted timber sliding sash windows with decorative carving to meeting rails.
- Painted timber door with small glazed windows, matching door-surrounds and glazing above door.
- Pressed red brick wall boundary treatment to forecourt with piers, copings and gate.



Two-storey terrace with large bay windows and generous proportions.

## 36 Bridge Street

- Slate roof, terracotta ridge tiles and brick chimney.
- Roof bracket decoration.
- Square pattern tiles below eaves.
- Large timber hung sash windows with vertical emphasis.
- Two-storey terrace faced with red random Rader stone.
- Buff brick quoins to window reveals and door reveals.
- Boundary treatment with low wall with piers and gate to forecourt.



Two-storey modest terrace.

## 1 Pendre

- Upper dormer window with timber fascia projects above the eaves. Tall timber sash windows add vertical emphasis.
- Facing decorative stonework in a polychromatic polygonal format.
- Red-brick in horizontal banding.
- Upper window reveal utilises contrasting alternate red and buff bricks and a mirrored pattern.
- Door head includes a stone lintel immediately above door. Above, alternate contrasting buff soldier brick with red header bricks.
- Red-brick reveal quoins to sides of windows and doors, arranged in a three-deep tooth form, with alternate patterns of projecting and receding bricks.
- Deep recessed porch.



Two- storey terrace.

## 1-3 The Avenue

- Half-timber detailed gables with finial on roof.
- Pressed red-brick details, including tall decorative chimneys.
- Clay roof tiles.
- Timber multi-pane casement windows. Leaded versions also prevalent.
- White render.
- Gable-fronted bay windows.
- Tiled porch extends over ground floor window.
- Timber vertical sliding sash windows, often with decorative carved details and stained glass
- Large front garden. Boundary treatment includes dwarf-wall and planting with pillars.



Two and a half / three storey semi-detached villas (circa. 1901-1920).

## 5 Spencers Row

- Tall, narrow hung sash windows with timber frames add vertical emphasis.
- Stone work in random sizes, soft dark red Rader conglomerate.
- Small recess to front door and windows.
- Quoins in brick to window and door reveals, arranged in a two-brick deep tooth form, with alternate patterns of projecting and receding bricks. Solider coursed lintel.
- Pavement straight outside front door in pennant stone.



Two-storey terrace in a cottage style, late 19<sup>th</sup> century.

## 6 Chapel Street

- Large Georgian style sliding sash timber windows and stone sills.
- White painted smooth render.
- Quoins in brick to door reveals, arranged in a two-brick deep tooth form, with alternate patterns of projecting and receding bricks.
- Pavement straight outside front door in pennant stone.



Two-storey terrace in a cottage style, late 19<sup>th</sup> century.

## **f. High Quality Hard and Soft Landscaping**

### **4.1.13 Surface materials (hard landscaping)**

One of the best examples of distinctive, good quality natural stone paving is The Dean's Steps.

There are small areas of well-maintained, high quality paving stones; these can be found along narrow pavements on Spencer's Row, Chapel Street and Heol-y-Pavin.

Many streets in the conservation area are asphalt and are of varying qualities. Some places in the conservation area exhibit ill-matched materials or areas of damage or poor repair work, which would benefit from improvements in the future.

Llandaff High Street was resurfaced in 2012 with simple, cost-effective asphalt surfacing paired with granite setts, kerbs and channels.

Visible private forecourts vary in quality, but a number show a careful choice of appropriate and well-laid materials that enhance the appearance of the area.



Decorative pebbles add texture, but uncomfortable to walk on.



Llandaff High Street re-surfaced, 2013.



Dean's Steps.



Cracked surfacing.

### **4.1.14 Boundary Treatments**

Buildings that positively contribute often include a forecourt with clear boundary treatment. This may be a combination of wall, hedge or railings. Contrastingly, some positive building facades are straight on the street without forecourts, which adds to the tightly packed urban character.

The pattern of boundary treatments in random combinations adds projection and relief interest to streets. Where boundary walls exist, it is important to retain them where they contribute positively to the character of the area.

Walls that enclose private-off street spaces are constructed mostly of rubble, occasionally using selected Radyr stone or polygonal 'ballast' stones in different shades of browns, greys and beiges, with some occasional earthy orange and reds and purples adding visual richness. Gate pillars exhibit a wide variety of brick colours, usually yellow, or of a warm orange colour. Walls will benefit from craftsmanship to repair them to a high standard.



Brick pillars, decorative coping.



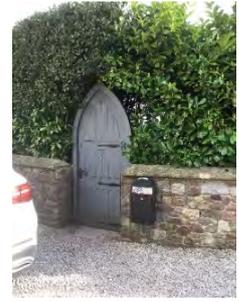
Decorative railings on dwarf-wall.



Commemorative railings.



Historic rubble stone wall.



Characterful gate entrance in wall/hedgerow.

#### 4.1.15 Street Furniture

In past years there have been initiatives to include special street lights, signs and street names in black and gold, reflecting heritage aesthetics. These have unfortunately fallen into disrepair and some more standardised fittings for road signs, lamp-posts and litter bins have been mixed in. It would be useful to have an agreed up-to-date palette of street furniture which is functional but which subtly reflects historic character. This could be utilised if funds become available for replacement.

#### 4.1.16 Trees and Soft Landscaping

The main landscape character derives from woodlands and tree planting. There are many trees with Tree Preservation Orders (TPO) for individual trees, groupings and protected woodlands.

Single trees often add to the character of public spaces (see section (b.) on the Presence of Landmark Buildings and Landscape Features) and should be protected where possible. There has been an unfortunate loss of an ancient Beech tree at Pen Pentre, on the corner of the Green and Heol-Y-Pavin.

Grassed areas, despite their uneven and sometimes steep slopes, are maintained and well-protected against vehicle damage. These incidental spaces are important in the streetscape as they often create set-backs to buildings, greenery, and can facilitate views in high density streets; they should not be used for car-parking.

Many streets are of a high urban density and are softened with planting and hedgerows grown in private gardens. The planting interspersed with stone boundary walls of differing heights, detailing and metal gates create an attractive and characterful environment for pedestrians. Boundary hedges enclosing gardens are well maintained. Hedges around fields and the river are often overgrown and require management.

There are three major belts of large forest trees. One runs from Fairwater Road, around the Rookwood, Cardiff Met residences and Broadcasting House to Llandaff Bridge and the Cathedral Cemeteries. The second is from Cardiff Road across the School grounds, over Western Avenue, around the Crescent and along the edge of Llandaff Fields. The third starts between the Cardiff Met campus and the River Taff and runs across the Cardiff Met front, uniting both sides of the Avenue. These important green wedges unfold the historic settlement and define its impressive landscape setting.

The remnants of the historic 'etoile' of avenue of trees to the east of Cardiff Met is included within the Cadw Register of Historic Parks and Gardens.



Foliage greens the urban street, Penedre.



High quality trees, The Green.



Woodland, Cathedral Grounds.



Tree-lined Western Avenue.

#### 4.1.17 Biodiversity

There is a Site of Importance for Nature Conservation (SINC) along the River Taff which overlaps with the edge of the conservation area boundary. Biodiversity in the SINC and within the conservation area needs to be considered alongside historic requirements. Historic areas and structures can be significant resources for biodiversity, providing habitats for bats, birds, insects, lichens and other flora. Old and Ancient trees, including mature trees in decline can form particularly important habitats. There may be new opportunities to enhance biodiversity through measures such as artificial nesting sites, ecological landscaping or habitat creation. Ready-made bricks, for example, can sometimes be sensitively integrated into appropriate new buildings for nesting purposes of species of birds, such as swallows or other fauna typically found in the area. Further information can be found in the Green Infrastructure SPG.

## 5.0 Areas of Special Character

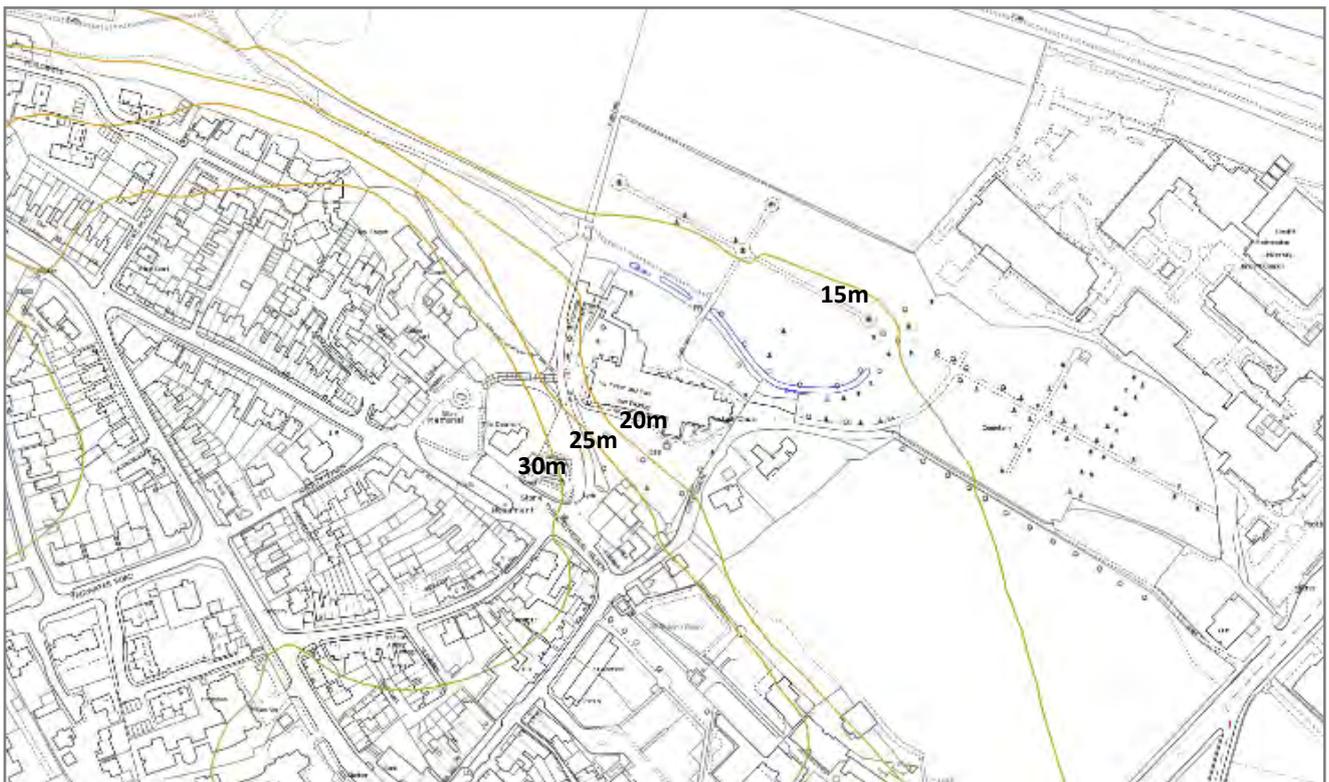
The conservation area has a huge diversity of different character streets within it. These are summarised briefly below. Even within the same streets, there can be different architectural styles and plot placements.

### 5.1 The Cathedral Precinct and River Taff

#### Overview

The Cathedral and its setting are pivotal in the urban structure of the conservation area and are at the heart of the character of Llandaff. The Cathedral is in a dip, sloping from The Cathedral Green down towards the River, and is approached from the Green via a stone paved staircase (the Dean's Steps). The Cathedral's setting includes the Taff River Corridor to the north and the Cathedral Green to the south. The wooded riverside stretching from Llandaff Bridge to Western Avenue is an attractive and distinctive feature of the locality, valued for its leisure uses. Along the riverbank and below the escarpment, paths pass through mature woodland and an establishing oak avenue, giving stunning views of the Cathedral. At the centre of this section of riverside, and retaining a rural atmosphere, are the playing fields of Cardiff Metropolitan University. They adjoin the new and old cemeteries, a semi-wild area lined by mature trees, and the former Llandaff Mill leat which is crossed by a unique stone bridge dating from Prichard's Victorian rebuild of the Cathedral.

**Map 15: Topography in Relation to the Cathedral**



The Cathedral is set down a significant slope and approached from the Green via the Dean's Steps.

Llandaff Cathedral in 1846.

A church has stood on the site since the 6<sup>th</sup> century. The current Cathedral church dates from 1120, though little remains of the original building. Throughout its history, it has been altered, ruined and restored. Of note is its 15<sup>th</sup> century bell tower (which now contains modern bells recently installed in 1992) and 19<sup>th</sup> century Gothic architecture, partially restored in the 20<sup>th</sup> century following WWII bomb damage. The Cathedral's history and fine architecture is also reflected in its interior and grounds.

### **Detailed History**

Llandaff Cathedral is one of the oldest cathedrals in Britain. Although the earliest parts date from about 1120, there has been a church on this site from about 546 A.D., when it is thought that Teilo came from West Wales and established a llan, or Christian community, on the banks of the River Taff and Dyfrig and Euddogwy are the earliest bishops to have authority in this area. This early church was known as "Little Minster" and measured only 28 feet long, 15 feet wide and 20 feet high. Bishop Urban was the first Bishop of Llandaff to be appointed by the Normans. He was responsible for the rebuilding of the Little Minster, which began in 1120. The body of St Teilo was brought to Llandaff, which became the centre of pilgrimage. The body of St Dyfrig was also brought to the Cathedral from Bardsey Island, which gave the Cathedral great prestige. Parts of the 1120 Cathedral can still be seen today, examples being the arch by the high altar and the north door.

The nave was extended in 1170 and the chevron decorated southwest door dates from this time. Around 1190 the west front and the six western arches of the nave were built. In 1250 the Chapter House was added to the Cathedral and a detached belfry was built on the Cathedral Green. On 23rd November 1266 a great dedication service was held to mark the completion of Llandaff Cathedral by Bishop William de Braose.

In 1485 the north-west tower was built. It was a gift from Jasper Tudor, uncle of King Henry VII, and housed 10 bells, carillon and clock mechanism.

From 1548 and for the next two centuries, Llandaff Cathedral went into decline. During the Reformation the silver shrine of St Teilo was broken and other valuables, vestments and money were taken away. The Cathedral passed into a period of poverty, the nave fell into ruin and only the Lady Chapel was used.

In 1646 during the Civil War, Oliver Cromwell's troops are said to have turned the nave of the Cathedral into an alehouse, the choir became a calf pen and other parts of the Cathedral were used as a stable. By 1687 the building was described as "our sad and miserable Cathedral".

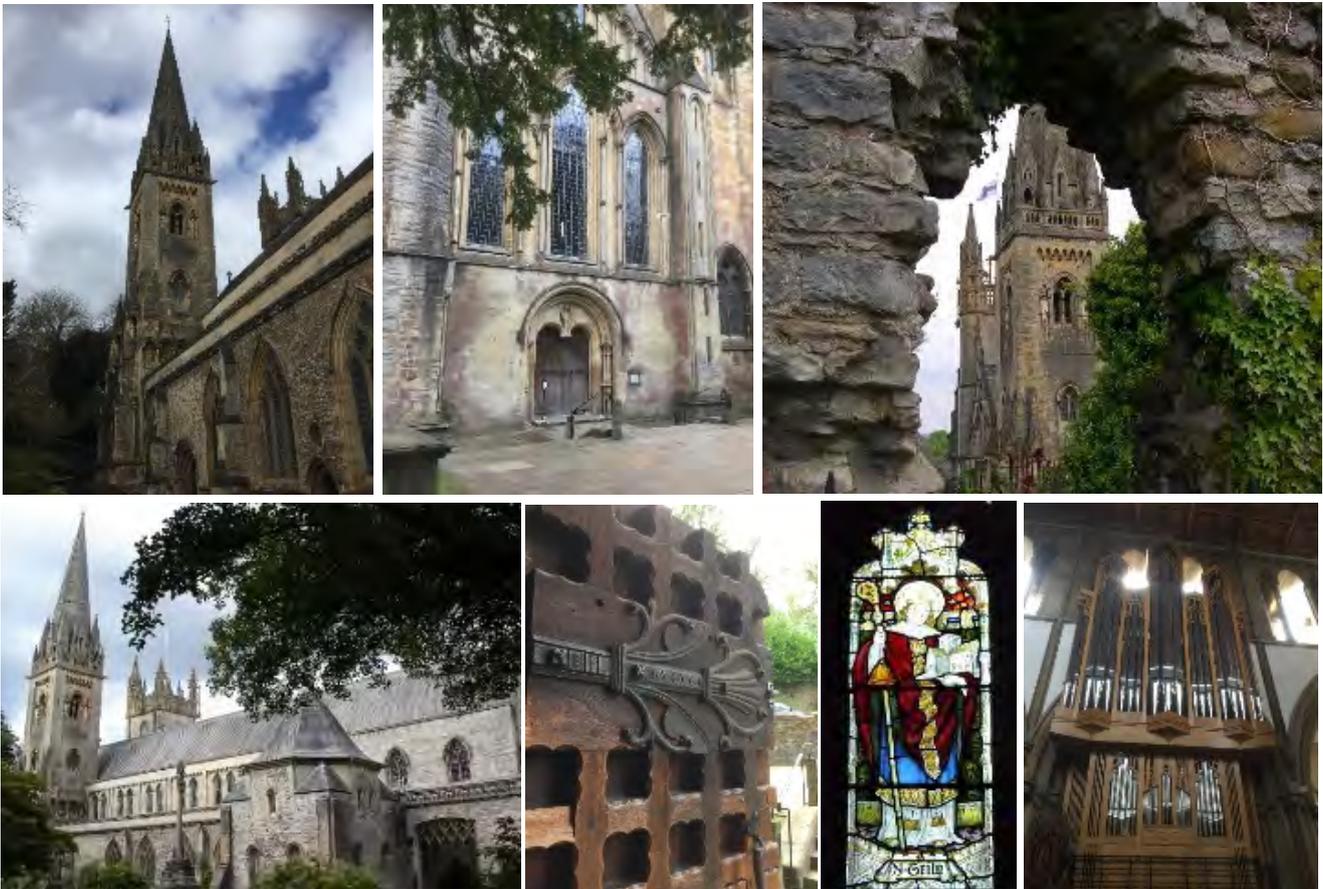
Storms in 1703 and 1723 brought a lot of damage: the pinnacles of the Jasper Tower fell down and the south-west tower collapsed through the roof of the nave; the Cathedral was in ruin.

In 1736 the architect John Wood of Bath began restoring the Cathedral building, what is known as the "Italian Temple" within the walls of the nave and the presbytery. Unfortunately, this destroyed much of the medieval work.

Increasing prosperity of South Wales due to industrialisation, led to the Victorian restoration. The architects John Prichard and JP Seddon led the work on the Lady Chapel, Sanctuary, nave and the choir. From 1867-69 Prichard added the south west tower and spire. A new organ and choir stalls were installed and a service of thanksgiving was held on 13 July in 1869 to mark the completion of the restoration of Llandaff Cathedral.

On 2 January 1941 a German parachute mine fell and exploded close to the south door. The resulting explosion caused the roof to fall in, the organ and most of the furniture were destroyed, the spire was unsafe and the Cathedral was unusable for services. The war damage to Llandaff Cathedral was significant, only one other Cathedral (Coventry), suffered more damage. The restoration work started in 1942. The Lady Chapel and Sanctuary were first made safe for worship. The Cathedral was gradually restored by the architect George Pace. During the restoration George Pace added a Pulpitum (a concrete arch). It was intended to block the view in the west to east vista at a height of 25 feet, while leaving the view open at ground level. Sir Jacob Epstein was commissioned to produce Christ in Majesty, which was hung from the pulpitum. The statue is 16 feet tall and weighs 350 Kg. At the time, it was the largest artistic casting that had ever been carried out in Britain. On 6 August 1960 a great thanksgiving service was held to mark the completion of the Cathedral's restoration in the presence of the Queen and the Duke of Edinburgh.

In 2004 a paved area was created at the front of the West door of the cathedral and 2010 saw the installation of a new organ, the largest wholly British built organ to be commissioned in a UK cathedral for 50 years.



Images of Llandaff Cathedral. Interior includes the magnificent organ and a stained glass window of St Teilo holding a model of the Church he founded (now the site of Llandaff Cathedral).

**Issues**

- The Cathedral fulfils a dual role: both as an important focus for the religious community and as a tourist attraction. Its location, setting and topography mean that accessibility is challenging and the potential for major public events and increased tourist numbers are limited.
- Llandaff Cathedral is situated in Cardiff, the capital of Wales. It therefore hosts the majority of civic events in Wales, such as the recent National Service of Remembrance attended by their Royal Highnesses the Earl and Countess of Wessex; access and egress is vital.

- Llandaff Cathedral has over 40,000 visitors per year. The visitors are a vital source of income for the Cathedral and for local businesses in Llandaff. Parking is extremely difficult and there is no disabled parking available.
- Many coach companies have stopped tours to Llandaff Cathedral as it is extremely difficult to manoeuvre a coach to the Cathedral due to parking in the High Street and in the Cathedral Green. There is no designated coach space for the Cathedral to allow easy access for visitors.
- The sacred and historic character of the cathedral precinct required maintenance without loss of historic fabric.
- The woodland and meadows beside the river require maintenance and management to ensure ease of access and preservation of key views.

### Enhancement Opportunities

- Improve pedestrian and vehicular access to the Cathedral and community with Equalities Act best practice.
- Enhance links to meadows and footpaths.
- Provide facilities for visitors.
- Link enhanced visitor attractions with opportunities for churchyards encircling landscape.
- Manage woodland scarps.
- Maintain boundary walls, railings and natural surface materials in the public realm.
- Use lighting to enhance the precinct and to direct visitors and community to the heart of the historic building group.
- The cemetery and the 'Prichard Bridge' form part of the Cathedral precinct. A Conservation enhancement scheme was undertaken in 2012/2013 to repair and refurbish the bridge.
- Enforce car parking off the Green away from the Cross.



Prichard Bridge repair and refurbishment in 2012/13.



The Cathedral precinct area.



## 5.2 The Cathedral Green

### Overview

- The Green is at the historic core of the village and is made up of lawned areas and hard landscaping. The hard landscaped area extends in front of the Bell Tower, beyond up to the City Cross and in front of the Bishops' Palace. (See Map 12, Open Spaces).
- The key elements of the historic core remain unchanged over the past 30 years aside from some minor changes in the public realm, maintenance work and on-site interpretation.
- The area benefits from containing a high number of buildings and monuments that positively contribute and there has not been much new development, aside from one post-war terrace of five on the corner of Bridge Street and the Cathedral Green.
- It is formally registered with the Council and can be found on the Register of Town or Village Greens.

- Despite realignments over the years, the medieval street layout is still legible in building form and public spaces.
- The space is semi-enclosed: enclosed on two sides by terraced houses, and more open on the other sides, characterised by detached landmark buildings of medieval and mid-19<sup>th</sup> century origin.
- The ensemble of historic buildings, monuments, war memorials, the Cathedral Cross, the trees and landscaping, the historic boundary walls and the foliage which drapes over them, together create a unique sense of place.
- The statutory protection afforded by listing makes this the most significant part of the Conservation Area.
- It is a peaceful setting with restricted vehicular movements.
- The use of a cross as a preaching point in this location dates back to medieval times and most of the current fabric likely dates back to the 16<sup>th</sup> and 18<sup>th</sup> centuries.
- The Bell Tower is a medieval ancient monument that stands in front of the Cathedral. For the past five-hundred years or so, the bells were rung from inside the Cathedral itself, so the detached Bell Tower became redundant and was laid to ruin.
- The Bishop's Palace is a ruined building that was the residence of the Bishop of Llandaff dating from the 1200s. As centuries went by, it was left to ruin. In the mid 1800s a new Bishop's Palace residence was bought, leaving the ruinous Palace to become a walled kitchen garden with some of its medieval walls repaired or altered. In the 1970s, further repairs and landscaping took place to facilitate the Palace becoming a public garden.
  - Outside the Bishop's Palace on the south side, there is a quaint route called Court Lane which leads from High Street and onwards to Cardiff Road.
- The Green is graced by a splendid plane tree.



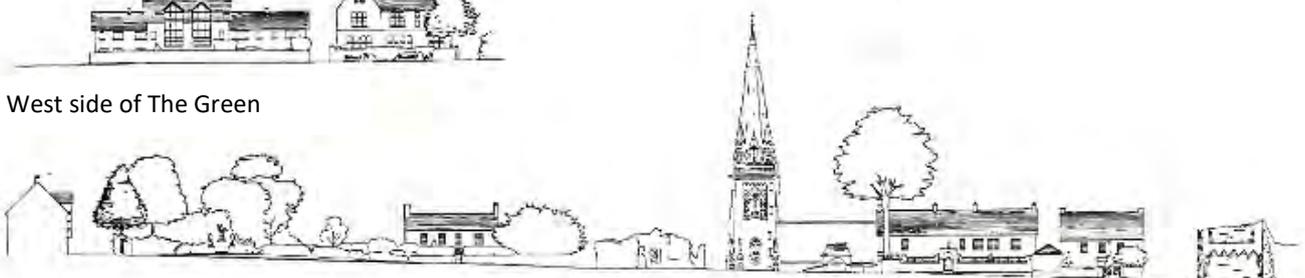
The Cathedral Green



South side of The Green



West side of The Green



North side of The Green

Sections from the *Llandaff Study 1989, Ed. B Davies et al.*

Illustrates the gentle slope, together with the scale and 2-3 storey pitched-roof development and landscaping, defining the space and character of the Green.

## Issues

- The areas around the Cross and the Bishop's Palace lack definition.
- Parking is intrusive at the entrance to the Cathedral and has become a significant issue in and around the Cathedral Green. Vehicles park in the middle of the road and around the cross.
- Effective parking enforcement on double yellow lines remains an issue.
- It is a challenge to retain sufficient car parking on The Green to enable access to the Cathedral and surrounding land uses, yet retain and enhance the historic charm.
- The entrance to the Cathedral Path and the Lych Gate needs enhancement through interpretation, definition and improvement of the public realm around them.
- The appropriate repair of boundary walls using traditional mortars and materials is not evident.
- The Palace has had essential repair work undertaken during 2015/2016 and an interpretation board added in 2017. The Palace would benefit from ongoing maintenance. There is also an historic footpath link through the garden to the adjacent school and this gated access is managed by the school.

## Enhancement Opportunities

- Complete public realm enhancements to The Green in association with repair of existing streetscape. Enhance the area through parking bay delineation utilising sensitive materials and more 'breathing space' for the Historic Monuments and pedestrian circulation space.
- Secure funding and make progress on the repair and restoration of the Bishop's Palace in line with the completed Conservation Plan.
- Enhance footpath links to the Cathedral and meadows beyond.
- Enhance landscaping around the war memorial.
- Secure restoration of historic walls as development opportunities arise.
- Improve interpretation and understanding of the history of the Cathedral Green.
- Rationalise parking around the White House and Lych Gate area in order to improve their context, the setting for important trees and the entrance to the Cathedral.
- It would be advantageous to draw up an improvement plan to sensitively rationalise parking in the area and create more space for the setting of the Bell Tower, Bishop's Palace and the Cathedral. Ongoing maintenance is of importance, as is a suite of public realm furniture.



The Cathedral with the ruined Bell Tower to the front, an image of how the Bell Tower may have looked in 1500 and the War Memorial on the Cathedral Green.

Car parking is important, but can appear over-dominant.



The City Cross in its position today and an illustration of the City Cross in use. In 1897 the cross head was rotated 90 degrees to mark Queen Victoria's Diamond Jubilee.

An early impression of the Bishop's Palace. The Gatehouse contained a guard room and prison.

Inside the Bishop's Palace.

## 5.3 High Street and Chapel Street

### Overview

- High Street holds an eclectic mix of architectural styles from a range of eras.
- The buildings lie within a well-defined street scene, framing views to the Bishop's Palace and the Cathedral beyond.
- The High Street is regarded as the focus for the community.
- High Street provides the main access to the Cathedral and Bishop's Palace.
- Shops along High Street operate in harmony with residential neighbours and it is a successful mixed use area.
- Chapel Street has a medieval street form and building alignment, although the buildings are of late Victorian / Edwardian period.
- A New Memorial Hall has been integrated on the edge of the car park.

### Issues

- Traffic congestion arises when there is pressure for parking within the car park and Cathedral Green.
- Some shop fronts have been altered or signage added with a loss of character, scale and integrity of the wider street scene.
- Signage sometimes obscures architectural details.
- Poor surfacing leads to loss of legibility at key entry points to the High Street, e.g. on Cardiff Road and where High Street joins Chapel Street.
- Congestion and pressure for on-street parking is present throughout the day.
- There is a lack of signage and directional / interpretational advice for visitors to the Cathedral.
- High Street car parks and lanes to the rear of High Street are in a poor state of repair.

### Enhancement Opportunities

- Where scale and detail has been lost, establish more appropriate materials and scale for shops as development opportunities arise.
- Re-surface road junctions at Chapel Street and Cardiff Road junctions.
- Enhance spaces at key meeting points (e.g. car park, the Institute, the Church Halls, Chapel Street and Cardiff Road).
- Enhance links to foot and cycle paths by improved lighting and directional signs.
- Encourage the use of traditional window and shop fronts where development opportunities arise and refer to Shopfronts and Signage SPG for design guidance.
- Encourage improvements of rear parking areas to High Street.



High Street

## 5.4 Mitre Place, Bruton Place and Fordwell

### Overview

- Riverside paths lie adjacent to this part of Llandaff.
- Bruton Place and Fordwell areas provide a gentle, leafy visual link to the valley.
- Houses are set within an open shared landscape in Fordwell.
- Bruton Place has a more enclosed garden village character where gardens create space between buildings and define plot size and building composition.
- A variety of house styles fill small plots, creating a rich mix of house types and a pleasing variety to the street scene.
- There are distant views of the Cathedral from Bruton Place.

### Issues

- Hedges and boundaries have been lost in Bruton Place leading to loss of legibility and character.
- There is a loss of architectural detail in front elevations.
- Poor maintenance to garden walls and boundaries has led to loss of character.
- Mitre Place used as overflow parking despite 'access only' signs.
- Mitre Place lamp posts do not match the conservation style ones in Bridge Street and Bruton Place leading off it.

### Enhancement Opportunities

- Maintain lower densities to reflect changing scale and character of the urban 'edge.'
- Enhance footpath links.
- Where development opportunities arise, enhance or reinstate boundary walls and hedges.
- Respect building scale and garden layout within planning applications for development.
- Better enforcement where 'access only' traffic restrictions are in place.



Mitre Place



Bruton Place



Fordwell



Woodland  
footpath

## 5.5 Cardiff Road

### Overview

- Cardiff Road is a busy major route leading north from the city.
- The street varies in width but narrows at the entrance to the village.
- There is a variety of building styles and scale.
- The street includes some very significant buildings, notably St Michael's College, the Old Probate and 51 Cardiff Road. The house adjoining the old Probate Registry (no.51 Cardiff Road) has been improved in recent years, as has the Black Lion Public House.

### Issues

- Traffic bottlenecks occur, sometimes to the detriment of the street scene and safety of pedestrians.
- Turning traffic into the Cathedral School sometimes adds to congestion.
- There is a lack of clarity at the junction with High Street.
- Traffic management dominates the east/west links between Ely Road, Fairwater Road, the school and High Street so that pedestrian movement is restricted.
- Boundaries and retaining walls to the west of the road are often poorly maintained.
- The depth of the St Michael's site requires management to protect the setting of the Listed Buildings. Its principal roadside verge and entrance merits a better setting.

### Enhancement Opportunities

- Improve entrance paths and routes to the primary school.
- Retain and enhance walled enclosures to properties.
- Rationalise access and setting of Llandaff House.
- Explore and secure enhanced east/west walking routes as development opportunities arise.
- Secure appropriate protection for the landscaped grounds of St Michael's College and secure enhancements to building groups at the rear.
- Protect architectural decoration through the effective management of areas covered by Article 4 Directions.
- Preserve and protect natural building materials (e.g. stone, brick and decorative half-timbering).
- Provide guidance to householders on window repair and replacement and the care and design of boundary walls and railings.



St Padarn's Institute (formerly St Michael's College)



Cardiff Road



Half-timbering effect



Junction of Cardiff Road, Bridge Road and Llantrisant Road.

## 5.6 Western Avenue

### Overview

- The road is a major barrier for pedestrians between Llandaff and the fields to the south.
- The road's character is of a tree lined avenue with large-scale buildings, interspersed with fields, allotments and groups of trees.
- Well maintained verges and trees define the status of the road and help to offset the intrusive effects of heavy traffic.
- The pedestrian bridge and associated barriers and road signage is visually incongruous. Significantly increased and improved provision is now made at numerous points at ground level for pedestrians crossing Western Avenue, which are now the crossing methods of choice. The pedestrian bridge is largely now redundant and could be considered for removal, subject to proper review of usage and any residual benefit it provides.
- The road is the main entrance to Llandaff from the east.
- The road affords highly significant views of the Cathedral across the school playing fields. Its footways provide access to riverbanks and woodland paths.

### Issues

- The current road design and traffic levels means that cycling and pedestrian movement across Western Avenue and onto Bute Park in the south is difficult.
- Western Avenue bisects the registered historic park of Llandaff Fields.
- The College is likely to develop and re-model further. This needs to respect the important landscape setting of the campus.
- The ongoing protection and enhancement of the remaining historic avenue of trees.

### Enhancement Opportunities

- Continue to protect the views to the Cathedral.
- Links to fields and the cathedral need to be identified, and where opportunities arise, enhanced to secure an appropriate setting for the Cathedral.
- Enhance Cardiff Met buildings and their setting when development opportunities arise.
- Improve verges and landscape setting around the rugby club and its car park.
- Improve footpath links to the Cathedral Precinct and Llandaff Village.
- Enhance roadside traffic and pedestrian signage to Llandaff.



View of Cathedral



Western Avenue



View from overbridge

## 5.7 Bridge Street, Bridge Road, Heol-y-Pavin and Heol Fair

### Overview

- The streetscape is varied and punctuated by building set-backs, small front gardens, combined with buildings straight on the street.
- The building scale is modest.
- There is a strong relationship between buildings and street.
- Natural materials play a strong part in defining the street scene and decoration on houses.
- Half-timbering is a strong decorative feature on Bridge Road and Heol Fair.
- High stone boundary walls define roadside and plot rhythms.
- The former police station forms the main focus for the Village at its northern entrance.
- Fragments of medieval street layout and buildings are evident within Heol-Y-Pavin and Heol Fair.
- Beech trees and the grounds of the BBC site play a strong part in enclosing the north end of the village.

### Issues

- On-street parking undermines the quality of the street scene.
- There is a loss of architectural detail on houses.
- Stone boundary and retaining walls require maintenance.
- Road-side verges are damaged by parking.
- The pedestrian routes leading from Imperial Buildings Row between the shops onto High Street and leading down to Cardiff Road are in a generally dilapidated state.

### Enhancement Opportunities

- Enhance roadside verges by managing off-street parking
- Protect architectural decoration through the effective management of areas covered by Article 4 Directions.
- Preserve and protect natural building materials (e.g. stone, brick and decorative half timbering).
- Provide guidance to householders on window repair and replacement and the care and design of boundary walls and railings.
- Retaining walls to the west could be lit at street level to enhance the stone work and enhance safety for pedestrians.



Bridge Road



Heol-Y-Pavin



Heol Fair



Heol Fair

## 5.8 The Avenue and Fairwater Road

### Overview

This area forms part of the new extension to the boundary and includes a number of high quality detached and semi-detached buildings which date back to circa 1920 and 1940 (See Boundary Review, section 1.4, for further details).

### Issues

- Large villas are under threat from development for higher density dwellings.
- One locally listed villa on Fairwater Road, opposite The Avenue, is starting to fall into disrepair and includes inappropriate railings, bin storage, signage and surface treatment within its curtilage.
- The pedestrian thoroughfare between The Avenue and Cardiff Road is a relatively large space with little sense of purpose or landscaping.

### Enhancement Opportunities

- Restore villas to their former glory.
- Retain and enhance the architectural features in the area, such as the terracotta brick detailing, the half timbering and timber windows, tiles, chimneys and other distinctive features.
- Improve the pedestrian thoroughfare between The Avenue and Cardiff Road with hard landscaping and lighting.



Fairwater Road



Fairwater Road



The Avenue



The Avenue

## 6.0 Management Plan - Aims and Objectives

The following aims and objectives respond to the identified issues and opportunities within the conservation area and will be given material consideration against any proposals put forward that may affect its special interest and character.

The long-term vision for the conservation area is to phase out any ill-considered modern additions and encourage high-quality alteration so that the importance of each building, and the of the whole conservation area, is revealed more clearly and protected for the future.

- 1. Any new design, intervention or repair will be of the highest quality, regardless of scale, as per the guidance set out in Section 7.**

*Reason: To protect the character of the conservation area.*

- 2. Buildings, features and spaces identified as making a positive contribution to the conservation area will be afforded protection against harmful change.**

*Reason: To protect the character of the conservation area as a whole and the significance of its individual heritage assets, in line with Government policy.*

- 3. Cardiff Council will encourage proposals which seek to address the identified opportunities for enhancement, subject to their design.**

*Reason: To improve the character of the conservation area.*

- 4. The rich natural landscape and setting of the conservation area will be protected through the considered management of existing trees and careful design of new planting.**

*Reason: To protect a defining characteristic of the conservation area and to manage trees in line with other local policy.*

- 5. Development within the setting of the conservation area which harms its character will be resisted. Development which positively contributes to the setting of the conservation area will be encouraged.**

*Reason: To protect and enhance the setting of the conservation area in line with Government policy.*

- 6. When procedures are revised for the serving of Article 4 Directions, existing and new Directions will be reviewed to ensure that the level of protection in place is maintained or enhanced where possible.**

*Reason: To protect the character of the conservation area as a whole and the significance of its individual heritage assets, in line with Government policy.*

- 7. Review the management of public and residential parking with a view to increasing the enforcement of existing regulations and considering the need for additional parking controls.**

*Reason: To balance the need for residential, business and visitor access against the visual and physical impacts of vehicle parking within historically sensitive areas.*

## 7. Guidance and Design Standards

This guidance has been prepared to assist those planning work of repair or alteration to their property to preserve or enhance the character identified in the Appraisal.

The Council has special powers to control types of development, that would normally not require planning permission, through an Article 4 [2] Direction. Such directions give control over almost all work to the front elevation of buildings, work in front gardens and new building works too.

Many of the buildings in the Conservation Area have been listed as buildings of special architectural or historic interest (locations of listed buildings can be checked via this link [ishare.cardiff.gov.uk](http://ishare.cardiff.gov.uk)). Owners of these properties must also obtain *Listed Building Consent* before they alter, extend or demolish any part of a building, whether internally or externally, in a manner that would materially affect its special architectural or historic interest. Owners may also need to comply with Building Regulations. A building control officer will be able to advise on the regulations ([www.cardiff.gov.uk/buildingcontrol](http://www.cardiff.gov.uk/buildingcontrol)).

**Planning controls within all conservation areas** (correct at the time of publication date – changes to national permitted development rights are published at [beta.gov.wales/planning-guidance-for-the-public](http://beta.gov.wales/planning-guidance-for-the-public))

- **Demolition** – Conservation Area Consent is required for the total or substantial demolition of buildings or structures.
- **Extensions** – more restrictions apply to alterations to dwellinghouses and the provisions for outbuildings/enclosures. Detailed technical guidance is available by searching ‘Permitted development for householders’ at [www.gov.wales](http://www.gov.wales).
- **Roofs** - planning permission is required for alterations to the roof of a dwellinghouse resulting in a material alteration to its shape, for example dormer windows. Permission is also required for rooflights on any slope.
- **Chimneys** - the installation, alteration or replacement of a chimney on a dwellinghouse.
- **Cladding** - dwellinghouse walls in stone, artificial stone, pebble dash, render, timber, plastic, metal, tiles or through external wall insulation.
- **Satellite dishes** - planning permission is required to install an antenna on a chimney, wall or roof slope which fronts, and is visible from, a highway.
- **Trees** - six weeks written notice must be provided of the intention to carry out works (for example lop, top, prune or fell) to trees with a trunk diameter of 75mm or more measured at 1.5m above natural ground level.
- **Shop Frontages** - planning permission is required for new or changes to existing shopfronts. Guidance on new frontages and reinstatement of traditional frontage design in Conservation Areas can be found in the Shopfronts and Signage SPG.
- **Advertisements** - outdoor advertisements in Conservation Areas are controlled through TAN 7 (Outdoor Advertisement Control).

## Additional controls for Llandaff

As a result of the Article 4 Directions in place, the following additional work requires planning permission if it fronts onto a highway or open space. The aim of these Directions is to ensure that change is managed carefully. No fee is payable for this type of application.

Controls relating to **Dwellinghouses**:

- **Boundary demolition** - of the whole or any part of any gate, fence, wall or other means of enclosure within the curtilage of a dwellinghouse and fronting a highway or open space (**this control was introduced in 2018**).
- **Windows & doors** - the alteration, removal and renewal of all doors and windows in a house where they front a highway.
- **Porches** - the construction of a porch outside any external door which faces a highway.
- **Hardstandings** - the construction of a hard surface where it is nearer a highway than the dwelling.
- **Roof materials** – Re-roofing within the conservation area requires planning permission where it constitutes an alteration. Where closely matching materials are used it is unlikely that permission will be required.

The following controls apply to **all buildings** regardless of use:

- **Painting** - the covering of original walling material by painting and the changing of the colour of existing painted exterior walls, masonry or windows where they front a highway.
- **Boundaries** - the erection, improvement or alteration of a means of enclosure (walls, gates, fences) fronting a highway or open space.

The fact that an application is required as a result of an Article 4 Direction does not necessarily mean that permission will be refused. However, the planning authority will pay particular regard to the extent to which the proposals preserve or enhance the character or appearance of the area.

## Repairs and maintenance

'Like-for-like' repairs (see adjacent box) will not need planning permission, however you may need to check with Building Control for compliance with building regulations ([www.cardiff.gov.uk/buildingcontrol](http://www.cardiff.gov.uk/buildingcontrol)).

Repairs and maintenance are inevitable with any building or site, regardless of age; however, within a conservation area, it is especially important that this is carried out sensitively to protect the historic fabric of its buildings and respect the established character of the wider area. Generally, repairs and maintenance are regularly carried out and to a good standard in the Llandaff Conservation Area, and it is important that this continues.

Maintenance differs from repair in that it is a pre-planned, regular activity intended to reduce the instances where remedial or unforeseen work is needed. The higher the levels of maintenance, the less need to carry out repairs.

Key points to remember when looking to carry out repair or maintenance work are:

- A method of repair that was suitable for one building may not be suitable for another. Repairs should always be considered on a case by case basis.
- Repairs using appropriate materials and techniques are always preferable over the wholesale replacement of a historic feature.
- Where a historical feature has degraded beyond repair, replacement should be carried out on a like-for-like basis.
- Where seeking to improve a failing modern feature, a traditionally-designed alternative using appropriate materials is preferable.
- Cement-based pointing is damaging to brickwork and masonry, and causes moisture problems. Repairs should always be carried out using a lime-based mortar and after raking out all the cementitious material. This will ensure the long life of the brickwork/masonry. Similarly, any external renders and stuccoes should be appropriately specified to prevent moisture issues.
- Due consideration should be given to how long-lasting a repair will be and what maintenance will be required to maximise its life span.
- Reversibility is an important consideration as better alternatives may become available in the future.
- Regular gutter and downpipe clearing should take place to prevent blockage and vegetation growth. This maintenance should also extend to the ground level drains to ensure effective water run-off.

Cadw have published a range of guidance documents on managing change to conservation areas and listed buildings, including its overarching policies for the historic environment set out in Conservation Principles (2011).

Invaluable background reading and information relating to the care and repair of traditional buildings includes:

### Understanding 'Like-For-Like'

A term frequently used in conservation is 'like-for-like' replacement or repair. This is frequently – and mistakenly – taken to mean that a modern alternative that generally echoes the style of the element removed is acceptable. However, this is not accurate or acceptable.

Like-for-like should always be interpreted as an alternative that matches the historic element removed in terms of its material, dimensions, method of construction, finish, means of installation and any other feature specific to the original element, such that the modern replacement is hardly discernible from the original (accepting that its condition will be greatly improved where the original has failed beyond repair).

For example, modern uPVC windows in imitation of Victorian-style sash windows but with false glazing bars and top-hung casement opening mechanism do not constitute a like-for-like replacement for the traditional timber-framed Victorian sliding sash windows, although they appear to look similar stylistically.

- The Old House Handbook by SPAB: [www.spab.org.uk/publications](http://www.spab.org.uk/publications)
- The Period Property Manual: [www.rics.org/uk/shop](http://www.rics.org/uk/shop)
- Heritage House: [www.heritage-house.org](http://www.heritage-house.org)

SPAB also operate a **free helpline service** open to anyone with a technical enquiry relating to old buildings ([www.spab.org.uk/advice/technical-advice-line](http://www.spab.org.uk/advice/technical-advice-line) 020 7456 0916, weekdays 9.30 a.m. - 12:30 p.m.)

## Windows and doors

Traditional windows and doors contribute very significantly to the character of the conservation area. Replacement of these features is one of the most difficult design problems and usually requires planning permission. The following advice applies both to windows and doors for extensions and their replacement in existing buildings.

- Original windows should be retained where possible.
- To meet the statutory requirement to *preserve or enhance*, new windows should accurately reflect the materials, style, proportions and opening methods of those originally fitted to the property.
- The proposed replacement of original / traditional timber sliding sash or early casement windows with uPVC or aluminium versions will generally not be supported.
- Original timber doors and frames should be retained.
- Frosted or stained glass door panels and porch details should be retained.
- Where original windows (or good copies thereof) have been lost prior to controls being introduced (in 1991), uPVC or aluminium replacement windows may be acceptable where they are considered to represent an enhancement to the appearance of the area when compared to that of the existing windows or door; for example the reintroduction of well-designed vertical sliding sash windows in place of outward opening casements. The better the quality of product being proposed the more likely it will be considered acceptable when considering the planning application. High quality versions feature 'run-through' horn white perimeter seals around and within the double glazed units, joints mimicking mortise and tenon as opposed to mitred, slim frames, putty line profiles, narrow meeting rail and deeper bottom rails. A pre-application discussion on this is advisable.

In practice, this means that you should first consider whether any replacement is necessary. It may be possible to repair and upgrade existing windows and doors, and skilled joiners can make repairs without difficulty. A list of local joiners is available at [www.cardiff.gov.uk/ENG/resident/Planning/Conservation/Traditional-Repairs](http://www.cardiff.gov.uk/ENG/resident/Planning/Conservation/Traditional-Repairs).

Repairs and/or upgrading doors or windows to integrate slimline double glazing into the existing windows would not require planning permission. Internal secondary glazing can be more effective in terms of noise and heat loss than replacements and would also not require permission. Historic England have produced guidance on upgrading traditional windows, visit <https://historicengland.org.uk/images-books/publications/traditional-windows-care-repair-upgrading>

Detailed advice relating to windows can be found in the 'Window Repair and Replacement in Conservation Areas' guidance note available at [www.cardiff.gov.uk/conservation](http://www.cardiff.gov.uk/conservation). If in doubt regarding the need for permission, always ask us before undertaking works.

## Chimneys

Chimneys are often an important part of the symmetry of each building group or terrace, punctuating the skyline and defining street corners. Stone chimneys on early houses can often identify the age of a building and the source of building stone. The original stack and pots are often an integral part of the design of later

Victorian houses. If a chimney which makes a contribution to the character of the house or conservation area becomes unsafe and require repair, it should be rebuilt to the original height and design, even if no longer in use.

The alteration or demolition of a chimney requires planning permission and will not be approved where this would harm the character or appearance of the conservation area. When chimneys become redundant it is important to ensure that steps are taken to maintain stone or brickwork and mortar and render. Original clay pots should be retained where they are still structurally sound. A proprietary weather-guard can retain ventilation and discourage damp through to the chimney breast.

## **Roof windows and dormers**

Dormers with decorative fascias of ridges and stonework are a common feature of the Victorian and Edwardian period during which much of the conservation area was developed. New dormers will only be appropriate where they respect the scale of the house, protect the character of the existing roof form, and the appearance of the conservation area. Large box dormers are unlikely to be supported. More guidance can be found within the 'Residential Extensions and Alterations SPG', visit [www.cardiff.gov.uk/ENG/resident/Planning/Planning-Policy](http://www.cardiff.gov.uk/ENG/resident/Planning/Planning-Policy).

Small traditional roof lights may be acceptable in discrete locations, offering an alternative to a dormer. The use of roof lights on front roof slopes or prominent side slopes will not be supported. Modern roof lights in deep frames, which break up the line of the roof surface, are not appropriate. Rooflights that are considered to be overly numerous, too large or randomly positioned will not be supported.

## **Roof materials**

Re-roofing within the conservation area requires planning permission where it constitutes an alteration.

Generally original roofing materials should be maintained or replaced with reclaimed or new natural slates (or clay tiles if applicable). A good quality textured synthetic slate may sometimes be an alternative for an unlisted building in the conservation area. Decorative ridge tiles, finials and ornamental barge boards should be retained.

## **Extensions & alterations**

In modernising their homes, residents often want larger kitchens and family rooms and need additional accommodation. Often this can be done without spoiling the character of either the individual house or the wider conservation area. However, the kind of extension, dormer window or loft conversion suitable for one type of house might be completely inappropriate for another, and so it is impossible to lay down a uniform set of rules for the whole area. However, the following notes set out some guidelines.

Because there is a clear building line to many roads in the area, front extensions are unlikely to protect the character of the conservation area. Similarly, side extensions may close up the gaps between properties, creating continuous terracing which destroys the open character of the layout and the carefully designed views between buildings.

The following points should be considered in planning an extension:

- 1. Will the alterations or extensions affect or overlook neighbouring properties?**

Guidance on this can be found within the Residential Extensions and Alterations Supplementary Planning Guidance (SPG).

**2. Will the extensions be visible from the road or another public viewpoint and, in particular, will they encroach upon spaces between buildings, closing out distant views?**

In general, any extensions should be to the rear of the property. Extensions that would intrude upon well-established views, for example, two-storey side extensions or extensions above existing garages are unlikely to protect the character of the conservation area.

**3. Will the extension be in character?**

For an extension to be acceptable in principle, it should be designed to harmonise with the original form and character of the house.

**4. Have any insensitive alterations already taken place?**

Some properties were altered before the present controls were in place. Previous insensitive and possibly unauthorised alterations should not be a justification for further inappropriate works.

The design of successful extensions requires a knowledge of building type and a sensitive handling of scale and detail. It is advisable to employ an architect with knowledge and experience of this type of work. The architect's drawings with clear, concise and accurate information and attention to detail will usually form a sound basis for a decision on an application. Design ideas can be tested through a Discretionary Pre-Application Enquiry prior to submitting a formal planning application. More information can be found at [www.cardiff.gov.uk/planning](http://www.cardiff.gov.uk/planning).

## **New development**

The following principles are designed to complement Local Development Plan policies and guidance and to ensure that Llandaff's distinctive character is protected and enhanced in proposals for development.

New development should respect its historic context in scale, form, materials and design. This can be expressed in:

- Continuity or variety in building line;
- Existing vertical and horizontal building rhythms;
- Adjacent building heights, roofs and cornice lines;
- Local building materials; and
- Excellence in new design.

Local identity can be protected and enhanced in new development by:

- Designing with an understanding of plot size and subdivision;
- Drawing on local traditions in built form, materials;
- Respecting and reflecting local craftsmanship in for example masonry, iron work or stained glass; and
- Respecting significant views in and out of the conservation area.

## **Traditional Shop Frontages**

There are a number of questions that can be asked to help inform the design of shopfronts (please refer to the Shopfronts Design Guide SPG). For older buildings, do the proposals respond to the historical context of the shopfront? Are there historic elements that need to be retained and remediated? Are there any historical photos which give clues about the original design of the shopfront?

## **Landscaping & trees**

This guidance relates to landscaping issues including trees, parking, gardens, hedges, fences and gates. Open spaces, verges and private gardens all contribute to the special character of the conservation area. The Planning Authority has special powers over these issues that apply only within the conservation area. Outlined below are the considerations that apply if you are planning work that involves these features.

### **Trees**

Trees in conservation areas have special protection. You must apply in writing for consent for work to trees that are greater than 7.5 centimetres (about 3 inches) in diameter, measured at 1.5 metres (about 5 feet) above the ground. Specifically you must give 6 weeks' notice to the Planning Authority of your intention to do the work. The Authority will agree to work which it considers will benefit the trees, and may agree other work where the benefits outweigh the damage to the trees. If it does not agree, the Authority may make a Tree Preservation Order to prevent the work. If the Authority does not respond within six weeks the work may be carried out anyway. The penalties the court may impose for not giving this notice are serious – the same as what would apply if the trees were protected by Tree Preservation Orders.

Work means not just the removal or killing of a tree, but also pruning or damaging roots or branches, whether directly or indirectly. An application should therefore be made if, for example, you plan to alter soil levels near trees, or install impervious surfaces, such as a new drive. It would also be an offence to damage trees by polluting their environment, such as by applying a broad leaved herbicide to an adjacent lawn. There are various exemptions from the need for consent, particularly for trees that are dead, dying or dangerous. You are advised, except in the case of immediate danger, to telephone a Tree Preservation Officer before exercising one of these exemptions. Trees that are illegally removed, or removed under an exemption, will normally have to be replaced. If the work you wish to do relates to a development for which you need planning consent, you should include it within the planning application. You will not then have to make a separate application under the regulations protecting trees – the whole issue will be considered at one time.

If you have a large or prominent tree you are strongly advised to take, from time to time, the advice of a tree surgeon as to its long term management. The Authority will give due weight to a qualified tree surgeon's opinion when considering applications. Trees in the highway, or in parks, are managed by the Council's Parks Services, and are subject to a long term management regime, supervised by a qualified arborist.

### **Parking in front gardens**

Llandaff was largely developed before car ownership became widespread. Constructing further off-street parking within the curtilage of individual houses can result in the loss of front gardens and hedges.

Where there is room for a garage, it should be designed in sympathy with the house to which it relates and without detriment to the overall area.

Grassed and planted front gardens and continuous hedging help to give the conservation area its special charm. The need to preserve this character may preclude the grant of permission to form a hard-standing in the front garden. Each case will be considered on its merits. The location of a hard-standing should not result in cars being parked directly in front of the house. Many roadsides include a grass verge contributing to the green character of the area. These should be protected. The creation of paved forecourts with turning areas usually reduce grassed areas, flower beds and the line of hedging, and result in the loss of a simple garden with concrete path.

### **Gates & boundary enclosures**

There are a variety of ways in which verge gardens and footpaths have been formed. In repairing and restoring boundaries or hedges, it is important to plant a species in character. Tree Preservation Officers may be able to offer advice on species suitable for your particular situation. Whilst hedges become established, a temporary post and wire or mesh fence may be an acceptable method for providing security to a garden.

### **Stone walls, boundaries and railings**

The Article 4 Direction means that any alteration to boundary walls requires planning permission, including partial demolition or minor alteration. Repointing can be undertaken if the existing style is matched.

Boundary walls should be regarded as an extension of the building which it protects. In Llandaff they define ownerships, provide privacy and often identify the age and character of the buildings they enclose, or their predecessors. Most importantly, walls define space and provide definition and character to the street scene. New walls should seek to fulfil the same objectives.

There are a number of different building materials in Llandaff and a huge variety of stone. Where natural stone walls are retained they should be repaired and maintained to ensure that stone work, joints, mortars, and copings all respect the original structure.

Black painted railings on a stone base are also typical of Llandaff. They should be maintained and if necessary replaced, using profile and sections to match.

### **Getting advice**

Pre-application enquiries can be submitted to determine both the need for consent and the scope for change (via the 'Discretionary Pre-App' process at [www.cardiff.gov.uk/planning](http://www.cardiff.gov.uk/planning)).

Any queries can be submitted via [www.cardiff.gov.uk/conservation](http://www.cardiff.gov.uk/conservation), email [conservation@cardiff.gov.uk](mailto:conservation@cardiff.gov.uk) or by calling Planning Reception on 02922 330800 and asking for Conservation.

Tree preservation queries can be sent to [treeprotection@cardiff.gov.uk](mailto:treeprotection@cardiff.gov.uk) or 02922 330815. Queries relating to trees in Council ownership should be directed to C2C at 02920 872087, via the Cardiff Gov Mobile App or the 'Report It' section online at [www.cardiff.gov.uk](http://www.cardiff.gov.uk)

### **Acknowledgements and thanks**

The Llandaff Conservation Area Advisory Group  
The Llandaff Society

This page is intentionally left blank

## Appendix 3. Consultation Comments and Responses

Page / para	Respondent	Comment	Response
General comment	Llandaff Society	<b>1. Major comments:</b> (i) Llandaff Society welcomes the consultation on the redraft of Llandaff Conservation Area Appraisal (LCAA), inclusion in the text of relevant LDP policies, and the Council's intention to adopt the final version as Supplementary Planning Guidance (SPG). We support the proposal to extend Llandaff Conservation Area (LCA) to include The Avenue, and Fairwater Road between its junction with The Avenue and Cardiff Road. We trust that the added weight that SPG designation confers will be reflected in decision-making in the existing and added areas from now on.	Support for the proposed extension is noted.  Agree. The Council adopts Conservation Area Appraisals - they already have the same weight as SPG.
General comment regarding the boundary	Llandaff Society	(ii) We would welcome consideration of further additions to LCA: (a) to include the whole of Llandaff Rowing Club - the current and proposed boundary divides the site - plus the fields between its northern boundary, Bridge Road and the River Taff to Llandaff Bridge. These fields contain a footpath which was part of the ancient pilgrimage route from Llandaff to the shrine of Our Lady of Penrhys - in medieval times on a par with Our Lady of Walsingham;	Disagree. TAN 24 advises that ' <i>green infrastructure may also be important, but conservation area designation is not likely to be an appropriate means of protecting landscape features, except where they form an integral part of the historic built environment</i> ' (para 6.2). Unfortunately it is not considered that the space represents an integral part of the historic built environment. The rowing club is not considered to be of special architectural or historic interest.
	Llandaff Society	(b) an extension to include the whole of the Rookwood site, which would give a more satisfactory context for its redevelopment; and	Disagree. The Rookwood site is considered to be very much an entity in its own right and has limited visual, physical or developmental relationship to the wider Llandaff Conservation Area. It is highly designated site. There are two Grade II listed buildings (house and grotto) that have protected settings. The boundary wall and other pre-1948 structures are protected as a curtilage-listed features. The site has several Tree Preservation Orders and is included at Grade II within Cadw's Register of Historic Parks, Gardens and Landscapes in Wales. Given that the site is enclosed by a high and protected wall, extending the conservation area to include the site is not considered appropriate.
	Llandaff Society	(c) to link with, and include, Insole Court CA.	Disagree. For similar reasons to the above. Insole Court is already protected by virtue of individually listed buildings, conservation area status and historic park registration.
	Llandaff Society	(iii) The Society would very much welcome rewording of the Aims and Objectives in Section 6: Management Plan to replace "should" with "will be" in numbers 1, 4 and 5. We believe this would achieve significant strengthening of the LCAA and help deliver its laudable aspirations.	Agree. Text changed from 'should' to 'will'.
	Llandaff Society	(iv) The Redrafted document downplays the loss of mature trees to the character and ambience of LCA - the list on page 27 does not include the loss of: a mature copper beech in the front garden of Pen Pentre, Bridge St; in the rear garden of St Pebblig, 1 Cathedral Green; and a mature silver birch in the rear garden of No 3 Ely Road. None of these appear to have been replaced as yet. The Society would welcome a reference to the need to replace TPOd trees, and the possibility of re-creating the Etoile (most of which is outside LCA). We suggest that funding for the latter could be secured from S106 contributions from developments within Llandaff ward.	Disagree. The policy is that the removal of TPO trees will require replacement or mitigation planting, and the harm caused by the loss of trees is clearly stated at page 27 and within the new Management Plan at page 53.
	Llandaff Society	(v) Llandaff residents value the amount of effort that goes in to attempting to conserve our City's historic assets, however it is clear that this has reduced over recent years as a result of cuts in staff and budgets. This has been to the detriment of the LCA, its attraction for residents and, as importantly in view of the role of tourism in the local and national economy, to its visitor attraction. We would	Noted. The condition of the assets has been raised with the relevant service areas and members of the public should report concerns via the usual channels and via their elected ward councillors.

		welcome a continuous programme of maintenance of historic assets rather than the current “stop/go” approach (see photos of the Bell Tower, Bishop’s Palace and Prichard Bridge taken on 9 January 2020).	
	Llandaff Society	(vi) Another visible way of showing the importance of CA designation would be for the Council to ensure speedier repair or replacement of damaged/life-expired heritage style street furniture - we suggest that funding for this should figure in the Llandaff ward S106 list. We would also welcome more rigorous adherence to policy in decision-making, monitoring of changes in the LCA, and provision of regular updates on progress to the community.	Noted. This matter should be raised with ward councillors, as there is a process for them to submit ideas for future infrastructure funding (s106 etc).
1.4.3	Llandaff Society	(vii) Para 1.4.3: the detailed schedule of changes between 2006 and 2017 does not include any photos of Llandaff Rugby Club. The façade of this building has been marred as a result of a decision of Cardiff Council to allow construction of a new entrance porch. It is not helped by the display of advertisements on the frontage and ugly sign board on the forecourt. We suggest that, if added to the properties assessed, this should feature in the “harmed” category, increasing the percentage harmed to over 3%.	Noted, however the building does not positively contribute to the character or appearance of the conservation area. The assessment was thorough but not exhaustive and was meant to provide an indication of overall change. The changes shown in 1.4.3 are merely indicative of some of the issues observed.  Concerns relating to potentially unauthorised advertisements/development should be reported to <a href="mailto:planningenforcement@cardiff.gov.uk">planningenforcement@cardiff.gov.uk</a>
1.4.3	Llandaff Society	(viii) We were dismayed by the decision by the Council’s Asset Management (Highways) Team to allow a cross-over at 14 High Street, and the subsequent decision of Planning Committee to approve parking in the front garden, contrary to its own policy. This forecourt continues to be an eyesore and the parked vehicles invariably back out of it across a well-used pavement onto this very busy street. This would mean that 18% (rather than 17%) of “alterations” have had a “harmful” impact on CA.	Noted. This is considered to be an over-simplification of the issues. The lawful fallback position for this site is explained in detail within the committee report for the application. The Article 4 Direction to close this loophole was issued as soon as practicable following the case, with significant officer time dedicated to ensuring that this cannot happen again without recourse to potential enforcement.
4.1.4	Llandaff Society	(ix) It is a matter of some regret that none of the newer buildings in LCA are described as “positively contributing” - even those built since the designation of LCA in 1976. We welcome the inclusion of the statement that “There may be scope for (the uncategorised buildings) to be markedly improved.....”, but suggest replacing the first 3 words with “The Council urges owners to investigate the...” and adding “The Council will require all future proposals to be in line with its LDP policies for development in Conservation Areas ie applicants must demonstrate that they ‘preserve or enhance’ LCA.”	Disagree. This change is not considered necessary; either to urge owners to make changes to enhance or to reinforce the LDP policy requirements.
4.1.4	Llandaff Society	(x) Re para 4.1.4, we suggest that the delightful Victorian cottages along Penedre (off Heol y Pavin) should be added to the buildings that “positively contribute” to the character and charm of LCA. They are largely original in form and their inclusion would illustrate the depth of interest that lies behind the frontages of LCA’s main streets and add to its overall character.	Agree. This was an error. The buildings have been added to those assessed as positive contributors.
5.1	Llandaff Society	(xi) We request the addition of text to para 5.1 after ....Green to the south.” in a new sub-para. The Society considers that adding the following would reflect the importance of the riverbank to LCA better than the current wording:  <i>“The wooded riverside stretching from Llandaff Bridge to Western Avenue is a very attractive and distinctive feature of the locality, much valued for its leisure uses. It includes the spectacular weir and renowned Llandaff Rowing Club. Along the riverbank and below the escarpment vernal foot and cycle paths pass through mature woodland and an establishing oak avenue, rich in plant and wildlife and giving stunning views of the Cathedral’s Jasper and Prichard Towers. At the centre of this section of riverside, and retaining a rural atmosphere, are the playing fields of Cardiff Metropolitan University. They adjoin the new and old cemeteries, a semi-</i>	Partially agree. Text for paragraph 5.1 altered to read:  <i>The wooded riverside stretching from Llandaff Bridge to Western Avenue is an attractive and distinctive feature of the locality, valued for its leisure uses. Along the riverbank and below the escarpment, paths pass through mature woodland and an establishing oak avenue, giving stunning views of the Cathedral. At the centre of this section of riverside, and retaining a rural atmosphere, are the playing fields of Cardiff Metropolitan University. They adjoin the new and old cemeteries, a semi-wild area lined by mature trees, and the former Llandaff Mill leat which is crossed by a unique stone bridge dating from Prichard’s Victorian rebuild of the Cathedral.</i>

		<i>wild area lined by mature trees, and the former Llandaff Mill leat which is crossed by a unique stone bridge dating from Prichard's Victorian rebuild of the Cathedral."</i>										
Map 9, Page 21	Llandaff Society	<b>2. Other comments:</b> (i) Map 9: The boundary of the LCA needs to be inserted - it is only shown in the Key.	Agree. Map updated									
4.1.6	Llandaff Society	(ii) Page 24, para 4.1.6 sub-para 3: We suggest replacing "strong" by "iconic".	Partially agree. 'Iconic' is not a word used in landscape and visual impact assessments, however the term 'strong' can be reinforced by changing to 'highly significant'.									
Map 13, page 31	Llandaff Society	(iii) Map 13: Should show "limited vehicle access" for cars and bicycles to the West front of the Cathedral.	Agree. Map updated									
5.5	Llandaff Society	(iv) Page 49: Under first photo replace "St Michael's College" by "St Padarn's Institute, formerly known as St Michael's College" - and throughout the text.	Agree. Text updated. Also updated reference at: 1.4.2, bullet 5.									
5.6	Llandaff Society	(v) Page 50, Overview - 6th bullet point: We suggest replacing "famous" with "iconic".....	Partially agree. As above, wording changed to 'highly significant'.									
5.6	Llandaff Society	....and "It provides.." with "Its footways provide..."	Agree. Text changed									
5.6	Llandaff Society	We also suggest replacing the first 2 photographs with one showing the view of the Cathedral across the playing fields, and another showing the Avenue with the pedestrian bridge and the frontage of the University beyond.	Agree. Photos changed.									
Page 54	Llandaff Society	(vi) Page 54, 'Roofs': It would be helpful to add a cross-reference to "roofing materials" on P58,	Partially agree. The controls relating to roof <i>materials</i> are actually local (within an Article 4) – and should be included in the items listed on page 55. Text to that section amended to reflect the need for permission where roofing materials changed, where this constitutes an 'alteration'.									
Page 54	Llandaff Society	and a reference to the need for planning permission/listed building consent for roof-mounted solar panels.	Disagree. Planning permission is generally not required for solar panels on unlisted buildings within the conservation area. The guidance does not describe listed building consent issues, as this regime is independent of that affecting the conservation area.									
Page 30	Llandaff Society	(vii) Typos: Page 30 "Parking should..." (rather than "could");	Partially agree. Text changed to 'would be beneficial...'									
Page 43	Llandaff Society	Page 43 Description of photos: delete "in Llandaff Cathedral" from the end of the first line;	Agree. Text changed									
Page 57	Llandaff Society	Page 57 omit "a" from the last but one line of last bullet point so that it reads "and deeper bottom rails";	Agree. Text changed									
	Llandaff Society	and Page 50, Issues - 2nd bullet point: replace "dissects" with "bisects".	Agree. Text changed									
General comment	Summary of Llandaff Society consultation held 09/01/20	1. An event was held from 4-7pm on Thursday 9 January in Llandaff Institute to enable members of the Society and others to see Cardiff Council's pull-up stands and copies of the documents that had been displayed in Insole Court before Christmas.	Noted. The continued efforts and support of the Llandaff Society is welcomed.									
	Summary of Llandaff Society consultation held 09/01/20	2. Twenty five people attended and it was clear that they appreciated the opportunity to input - some had not been aware that the review was taking place even though they lived within Llandaff Conservation Area (LCA). There were 31 comments about 10 issues as follows:	Noted									
		<table border="1"> <thead> <tr> <th>COMMENT</th> <th>NUMBER</th> <th>PERCENTAGE</th> </tr> </thead> <tbody> <tr> <td>Support CA extension to include The Avenue and part of Fairwater Rd</td> <td>6</td> <td>20</td> </tr> <tr> <td>Would like Rookwood added in view of imminent redevelopment</td> <td>8</td> <td>26</td> </tr> </tbody> </table>	COMMENT	NUMBER	PERCENTAGE	Support CA extension to include The Avenue and part of Fairwater Rd	6	20	Would like Rookwood added in view of imminent redevelopment	8	26	
COMMENT	NUMBER	PERCENTAGE										
Support CA extension to include The Avenue and part of Fairwater Rd	6	20										
Would like Rookwood added in view of imminent redevelopment	8	26										

		<table border="1"> <tr> <td>Would like extension to include the Insole Court CA</td> <td>2</td> <td>6</td> </tr> <tr> <td>Would like extension to include all Rowing Club &amp; land to the Bridge</td> <td>3</td> <td>10</td> </tr> <tr> <td>Unsatisfactory stop/start maintenance of key heritage assets in CA</td> <td>1</td> <td>3</td> </tr> <tr> <td>More focus needed on monitoring changes in the CA</td> <td>2</td> <td>6</td> </tr> <tr> <td>More weight needs to be given to CA policy and the CAA and implementation monitored</td> <td>3</td> <td>10</td> </tr> <tr> <td>Useful documents and the opportunity of the session to input</td> <td>2</td> <td>6</td> </tr> <tr> <td>Could the original names of properties be protected?</td> <td>2</td> <td>6</td> </tr> <tr> <td>Concern about proposals for Trenewydd</td> <td>1</td> <td>3</td> </tr> </table>	Would like extension to include the Insole Court CA	2	6	Would like extension to include all Rowing Club & land to the Bridge	3	10	Unsatisfactory stop/start maintenance of key heritage assets in CA	1	3	More focus needed on monitoring changes in the CA	2	6	More weight needs to be given to CA policy and the CAA and implementation monitored	3	10	Useful documents and the opportunity of the session to input	2	6	Could the original names of properties be protected?	2	6	Concern about proposals for Trenewydd	1	3	
Would like extension to include the Insole Court CA	2	6																									
Would like extension to include all Rowing Club & land to the Bridge	3	10																									
Unsatisfactory stop/start maintenance of key heritage assets in CA	1	3																									
More focus needed on monitoring changes in the CA	2	6																									
More weight needs to be given to CA policy and the CAA and implementation monitored	3	10																									
Useful documents and the opportunity of the session to input	2	6																									
Could the original names of properties be protected?	2	6																									
Concern about proposals for Trenewydd	1	3																									
	Summary of Llandaff Society consultation held 09/01/20	3. As well as revealing support for the draft which will form the basis for the Society's response, discussion re the consultation by 8 members of Llandaff Society Committee on 7 January revealed support for extension of LCA to include the whole of the Rowing Club and the fields to the north of it along the River, as well as extension to include Rookwood and Insole Court CA; and support for more active pursuit of owners who have not yet planted trees to replace TPOd trees lost from LCA.	Noted, these matters are covered above.																								
General comment – maintenance	Member of the public	The Campanile - Llandaff Cathedral Green. A shame to see the recent contractor's work on this high-profile feature of the green wasted by allowing the railings to rust and doing no follow-up routine maintenance despite an interpretation panel being installed. (with photos)	Noted, however the monument does receive cyclical maintenance by Parks Services. Issues of particular concern should be reported directly to that service area via the usual channels.																								
General comment – maintenance	Member of the public	A shame to see this 2013 restoration of the last remaining trace of the mill-stream - featured on pages 10 and 44 of the appraisal - but with no mention of the subsequent failure to follow it up with and interpretation or maintenance.  This has been the site of periodic 'dumping' of vegetation presumably by Cathedral-employed contractors. It appears to be a no-man's land between the Cathedral and the Council.  Some ageing volunteers have tried to do routine maintenance but we have no mandate.  Could the Council not provide some leadership here?	Noted. This matter has been raised with Bereavement Services and the Cathedral.																								
Page 8.	Planning colleague	Suggest rewording to of bullet 3 to include Bruton Place:	Agree. Text changed.																								
General comment	Llandaff Conservation Group	We would like to have it noted as part of the consultation process for the CAA the following:  The Llandaff conservation group have been involved in discussions with officers throughout, made multiple submissions and proposals to be incorporated into the CAA, contributed with local information to ensure that there has been strong representation locally.	Noted. The continued efforts and support of the Llandaff Conservation Group is welcomed.																								
General comments	Member of the public	I should like to make the following comments on your Llandaff Conservation Area appraisal, details of which I saw last week.  The comments on caring for the architectural quality of the area are helpful. However there appear to be two aspects that are not adequately dealt with. I recommend that more attention is given to these:	Comments noted, however: 1. Overhead wires do not fall within the scope of planning controls. 2. The issue of highway management is raised throughout the CAA. Any changes to traffic or parking arrangements will be subjected to public consultation and as in other designated areas, the conservation area will be a material consideration to be taken into account in their design and associated visual or physical impacts.																								

		<ol style="list-style-type: none"> <li>1. There are any examples of unsightly (and unnecessary) overhead wires in the area (e.g. in Penedre). It has long been a priority in many conservation areas to eliminate such wires. Once stated as an objective it should be possible to negotiate with BT/Openreach within a reasonable timescale.</li> <li>2. Liaison with the highways and traffic management department in the Council is crucial in conservation areas as has recently been proved in the High Street at the former Myrtle Cottage. There is a major issue about the provision of car parking that does not harm the environment or create safety issues (e.g. on Heol Fair) and the movement of traffic through the area needs to be monitored and if necessary subject to further controls e.g. Heol y Pavin/ Bridge Street.</li> </ol>	
Section 5.1 The Cathedral Precinct and the River Taff Corridor	Member of the public	<p>The Cathedral and its' setting are pivotal in the urban structure and are at the heart of the character of Llandaff. The Cathedral is in a dip at the foot of the escarpment, sloping from the Cathedral Green down towards the river and is approached from The Green by a grand staircase ( The Dean's Steps) together with minor roads. Its' setting includes the River Taff Corridor to the North and the Cathedral Green to the South.</p> <p>Suggested insert in italics:</p> <p><i>The wooded riverside stretching from Llandaff Bridge to Western Avenue is a very attractive and distinctive aspect of the locality, much valued for its leisure uses and includes the spectacular weir dating from the Industrial Revolution .This is the home of the renowned Llandaff Rowing Club and its' adjoining paddocks are now equipped with an excellent petanque piste.</i></p> <p>(NB: The status of the LRC dating from the early 20th century and the adjoining land below Llandaff Bridge would in my view justify its late inclusion within the extended Llandaff Conservation Area, bearing in mind that a substantial part of the site is already contained therein).</p> <p><i>Along the river bank and below the escarpment, connected vernal foot/cycle paths pass through mature woodland and an establishing oak avenue, rich in plant and wildlife . At the centre of this are the playing fields of Cardiff Metropolitan University which retain their rural atmosphere and adjoin the old and new cemeteries, full of mature trees and embracing parts of the former Llandaff Mill lete with a unique stone bridge dating from Prichard's Victorian rebuild of the Cathedral providing an essential access to this semi-wild area.</i></p> <p>The wider woodland and open space beside the river need maintenance to ensure access and retention of key views ( see section on views and vistas) The Cathedral forms an important link between the countryside element of the River Corridor and the tightly packed high-density urban grain of the village streets.</p>	Disagree. It is considered that the existing description provides a good overview of the area's character – this is not meant to be an exhaustive list.

Responses received to the online survey. Only four responses were received, all supportive of the boundary extension.

#	Question	Options	Respondent 1	Respondent 2	Respondent 3	Respondent 4
1	Do you live within the conservation area boundary?	Yes - existing area	Yes - existing area			
		Yes - the proposed extension area		Yes - the proposed extension area		Yes - the proposed extension area
		No			No	
		Optional additional comments		We're in the process of buying a house within the proposed extension.		I am extremely pleased that my home will become protected under the Conservation Area.
2	Llandaff Conservation Area was first designated in 1968 and last reviewed in 2006. Do you think that the overall area has retained its special character?	Strongly Agree		Strongly Agree		
		Agree	Agree		Agree	Agree
		Disagree				
		Strongly Disagree				
		Don't know				
		Optional additional comments				Although some more modern erections are deemed ugly and out of character. If proposals for new buildings were designed to copy existing dwellings using more modern, efficient materials, that would certainly be encouraged!
3	What are the features you value most about the area?		Its unique city-village quality, its awareness of its history, its community spirit.	Retention of heritage buildings. Lack of large out of place new builds	No response	Having our 'green lung' with regard the mature gardens, local woodlands along the river Taff and space to move about. Space IS luxury these days, but with the ever increasing influx of people impinging upon each others space, I feel it important that we preserve our current way of living here in Llandaff.
4	What do you see as the biggest threat to the character or appearance of the area?		Cars	Ugly new build homes like the one recently granted on the Avenue.	Plasdwr- traffic.	The new housing development proposals for building on the BBC Site after demolition. I've already made my thoughts known to the so-called 'architect' who's come up with the most dismal, characterless, crappy designs that will become a blot upon our landscape!
5	What enhancements would you like to see in the conservation area?		Para. 4.1.12 acknowledges that accessibility is generally poor. There are no dropped kerbs at the Bridge Street/Cathedral Green intersection. Wheelchair and scooter users have no means of reaching the path across the Green other than by using public roads. I should like to see some priority given to redressing the lack of dropped kerbs here and elsewhere in the conservation area.	More pedestrian crossings. Improved maintenance on pedestrian routes.	No response	More fruit trees and herb bushes planted to provide free food and shelter to the wildlife who are increasingly losing their homes due to new developments under the Local Development Plan, and for people to forage for free. There is something so special about picking your own blossom, fruit or sprig of health-giving herb and ESPECIALLY if it's FREE!
6	We are proposing that the conservation area boundary be extended to include most of The Avenue and several properties at the the eastern end of Fairwater Road. Do you agree with this proposal?	Yes	Yes	Yes	Yes	Yes
		No				
		Don't know				
		Optional reasons or comments		Protecting heritage of area		I live at number 12 and am all for it! The square 'LEGO' blocks of flats should never have been allowed to be built UNLESS designed with more character! Don't get me wrong, I love all my neighbours living in them, but surely it doesn't cost much more to add some character to the designs of buildings without affecting their function? Architects need to start thinking 'outside the box' more, as even a child can draw a box, square or rectangle!!
7	Do you have any other comments on the existing boundary?		No response	No response	No response	I believe the walls are already protected, but if not, please include them too and all the existing trees!
8	Do you have any other comments regarding the conservation area, the Appraisal or the planning controls proposed or currently in place?		No response	We trust that existing alterations to house in the extended areas will be taken into account as precedent when considering new applications.	No response	I'm happy with what you're doing so far and thank you all for protecting the lovely area that I'm living in.
9	If you would like to leave contact information, please do so below:		No response	No response	No response	Resident of The Avenue, Llandaff

---

**LOCAL AIR QUALITY MANAGEMENT – CARDIFF COUNCIL AIR  
QUALITY ANNUAL PROGRESS REPORT 2020**

**STRATEGIC PLANNING & TRANSPORT (COUNCILLOR CARO  
WILD)**

**AGENDA ITEM: 14**

---

**Reason for this Report**

1. The purpose of this report is to seek approval for the 2020 Cardiff Council (CC) Local Air Quality Management (LAQM) Annual Progress Report (APR) based upon on air quality datasets obtained in 2019. This report requires Cabinet to approve and recommend the finalisation of the 2020 Annual Progress Report for submission to Welsh Government for approval.

**Background**

2. Under Section 82 of the Environment Act 1995 every local authority has an obligation to regularly review and assess air quality in their areas, and to determine whether or not air quality objectives to protect health are likely to be achieved. Where the air quality reviews indicate that the air quality objectives are not being achieved, or are not likely to be achieved, Section 83 of the 1995 Act requires local authorities to designate an Air Quality Management Area ('AQMA'). Section 84 of the Act ensures that action must then be taken at a local level which is outlined in a specific Air Quality Action Plan (AQAP) to ensure that air quality in the identified area improves.
3. The air quality objectives applicable to LAQM in Wales are set out in the Air Quality (Wales) Regulations 2000, No. 1940 (Wales 138) and Air Quality (Amendment) (Wales) Regulations 2002, No 3182 (Wales 298).
4. The Annual Progress Report provides details on the ratified data for air quality monitoring undertaken in 2018 within the Cardiff Council area.
5. Welsh Government issue statutory policy guidance to Local Authorities under section 88 of the Environment Act 1995 to bring the local air quality management system in Wales into line with the sustainable development principle outlined in Welsh Government's Well-being of Future

Generations legislation, 2015. This guidance, with which local authorities must have regard to when carrying out their air quality functions under the Environment Act 1995, sets out that authorities in Wales have to produce an Annual Progress Report in **draft** by 30<sup>th</sup> September each year and publish it by 31<sup>st</sup> December at the latest. This report must include monitoring results for the previous calendar year, a progress report on action plan implementation and an update on any new policies or developments likely to affect local air quality.

6. This Annual Progress Report satisfies the above criteria examining ratified datasets for air quality monitoring undertaken in 2019 within the Cardiff Council area.
7. Poor air quality is now considered the largest environmental risk to public health in the UK.<sup>1</sup> There is clear scientific evidence that shows that air pollution exposure reduces life expectancy by increasing mortality and morbidity risk from heart disease, and strokes, respiratory diseases, lung cancer and other conditions.
8. In the UK, in the context of air quality management, the main air pollutants that are the primary public health concern are particulate matter and Nitrogen Dioxide (NO<sub>2</sub>). In the UK, it has been estimated that an equivalent of 23,500 deaths can be attributed to long-term exposure to NO<sub>2</sub> each year.<sup>2</sup>
9. The principle source of these pollutants is from road transport emissions, particularly from diesel cars. In 2012, the International Agency for Research on Cancer listed diesel exhaust pollution as a Class 1 carcinogen<sup>3</sup> and extended this to all ambient air pollution in 2013.<sup>4</sup>
10. Public Health Wales has stated that poor air quality is the second greatest public health concern after smoking and is the most significant environmental determinant of health. In Wales, based on data for the period 2011-2012, it has been estimated that an equivalent of 1,100 avoidable deaths can be linked to NO<sub>2</sub> exposure each year.
11. Poor air quality does not only cause ill health, it also has a wider societal cost. Accounting for health service costs and reduced productivity through lost workdays in the UK this is significant, standing at around £20bn every year.<sup>5</sup>
12. Some people are more at risk than others. Air pollution can disproportionately affect vulnerable population groups (e.g. children, older people, people with underlying chronic disease), as well as those exposed

---

<sup>1</sup> 'Estimating local mortality burdens associated with particulate air pollution', Public Health England, (2014)

<sup>2</sup> 'Improving air quality in the UK: tackling nitrogen dioxide in our towns and cities: UK overview document' Defra (2015)

<sup>3</sup> International Agency for Research on Cancer, (June 2012)

<sup>4</sup> International Agency for Research on Cancer, (October 2013)

<sup>5</sup> 'Every breath we take: the lifelong impact of air pollution', Royal College of Physicians and Royal College of Paediatrics and Child Health (2016).

to higher levels because of living or commuting in urban or deprived locations.<sup>6</sup>

13. Examining the most recent datasets (2017) made available by Public Health Wales for the total number of all-cause non-accidental deaths registered in the Cardiff and Vale University Health Board area, the long term mortality burden attributable to air pollution (fine particulate matter and nitrogen dioxide combined) is an estimated effect equivalent to 178-227 deaths.

## Issues

### Air Quality in Cardiff

14. There are currently four Air Quality Management Areas (AQMAs) declared across Cardiff which have all been declared due to exceedances of the annual mean NO<sub>2</sub> Air Quality Standard (40ug/m<sup>3</sup>), known to be derived from road transport. These areas are:
  - **Cardiff City Centre AQMA** (declared 1/4/13 to incorporate Westgate Street; formerly St Marys St AQMA);
  - **Ely Bridge AQMA** (declared 1/2/07);
  - **Stephenson Court AQMA** (declared 1/ 12/10); and
  - **Llandaff AQMA** (declared 1/4/13).
15. The 2020 Annual Progress Report presents monitoring data captured in 2019. In line with the Cardiff Council's (CC) statutory duties under Part IV of the Environment Act 1995, Shared Regulatory Services on behalf of CC undertakes regular air quality monitoring at specifically allocated locations across Cardiff using automated and non-automated principles for ambient air Nitrogen Dioxide (NO<sub>2</sub>), Particulate Matter (PM<sub>10</sub> & PM<sub>2.5</sub>), Sulphur Dioxide (SO<sub>2</sub>), Carbon Monoxide (CO) & Ozone (O<sub>3</sub>).

### Automated Monitoring Network

16. In 2019, Cardiff had three automatic air quality monitoring sites located at Frederick Street in the City Centre, Richard's Terrace, just off Newport Road and Lakeside Primary School.
17. The Frederick Street (Urban Background) site monitors on a 24/7 basis measuring levels of NO<sub>2</sub>, PM<sub>10</sub> & PM<sub>2.5</sub>, SO<sub>2</sub>, CO and O<sub>3</sub> feeding data directly into Defra's Automatic Urban and Rural Network (AURN).
18. The Richard's Terrace site (Urban Traffic/ Roadside) monitors on a 24/7 basis measuring levels of NO<sub>2</sub> & PM<sub>10</sub> at that location, feeding data directly into Defra's Automatic Urban and Rural Network (AURN).
19. The Lakeside Primary School (Urban Background) site monitors on a 24/7 basis measuring levels of Polycyclic aromatic hydrocarbons (PAH) at that location, feeding data directly into Defra's PAH Digital (solid phase) Network. SRS serve as a local site operator to this site, however data

---

<sup>6</sup> National Institute for Health and Care Excellence 2017; WHO Regional Office for Europe 2016

interpretation is sanctioned by the consultants Ricardo Energy and Environment Ltd. Therefore, the purpose of this site and results derived are not corresponded to any of the limit values outlined for the purposes of LAQM in Wales.

20. At the time of writing this report, Cardiff Council with the financial support of Welsh Government has commissioned a fourth automated monitoring site, located on Castle Street. The roadside site monitors on a 24/7 basis measuring levels of NO<sub>2</sub>, PM<sub>10</sub> & PM<sub>2.5</sub> at that location and forms part of the Welsh Automated Monitoring Network.
21. In addition, Cardiff Council has acquired the use of 6 near real time indicative air quality analysers. 5 analysers were purchased with the financial support of Welsh Government and the 6<sup>th</sup> analyser was facilitated by the Shared Regulatory Services (SRS) who had successfully accrued funding via a S106 planning contribution. The analysers have been specifically placed and represent relevant exposure. The analysers continuously monitor for Nitric Oxide, Nitrogen Dioxide & Ozone, PM10 & PM2.5, and do so every 15 minutes (data uploaded every hour).
22. An online platform to access the available datasets is yet to be finalised with Cardiff Council's webpage development team.

#### **Non-automatic Monitoring Sites-**

23. In 2019 CC operated 100 specifically allocated non automatic monitoring sites in Cardiff which monitor levels of Nitrogen Dioxide (NO<sub>2</sub>).
24. In 2019, out of the 100 monitoring locations, 6 monitoring sites recorded exceedances of the annual average objective set for NO<sub>2</sub> (40µg/m<sup>3</sup>). All 6 monitoring locations were recorded within the already established City Centre and Llandaff air quality management areas (AQMA).
25. In accordance with LAQM best practise guidance; there are no monitoring sites in the district with annual average concentrations above 60µg/m<sup>3</sup> in 2019. Therefore, this indicates it is unlikely that the 1- hour nitrogen dioxide objective was exceeded.
26. In accordance with Welsh Government's (WG) Local Air Quality Management Policy Guidance, July 2017, Council recognise that there is no defined "safe level" when describing levels of air quality. It is noted that the annual average datasets do highlight monitoring sites established outside the designated AQMA areas with elevated annual average NO<sub>2</sub> readings. These sites will need to be closely scrutinised to ensure the annual average objective is not breached in future years.
27. In view of the complete yearly datasets, SRS will continue to perform its yearly review of the monitoring network and rationalise where necessary. This will include decommissioning those locations with continued compliance, or with levels well below the given air quality limit values. SRS will also look to improve certain monitoring sites to represent worse-case exposure or commission new monitoring sites to increase its geographical understanding.

## School Monitoring

28. **Client Earth-** As part of the NO<sub>2</sub> monitoring network, for 2018 the Council began a monitoring campaign at 9 specific schools across the borough. Here, Cardiff Councillors motioned a review of the current air quality monitoring network established across the borough and it was highlighted that there is a requirement to monitor local air quality in and around school buildings. It was decided that those schools to be monitored will be those highlighted in last year's Client Earth report which discussed potential detrimental air quality impacts at schools in relatively close proximity to major road networks. The report detailed 9 schools within 150m of roads with potentially harmful concentrations of nitrogen dioxide (NO<sub>2</sub>);

- Ysgol Mynydd Bychan, Gabalfa;
- St Joseph's RC Primary, Gabalfa;
- Stacey Primary, Roath;
- Tredegarville CIW Primary, Adamsdown;
- Cardiff Academy, Roath;
- Mount Stuart Primary, Butetown;
- St Peter's RC Primary, Roath;
- Cathays High School, Cathays; and
- St Teilo's CIW High School, Llanedeyrn

29. Annual datasets (2018 & 2019) gathered at each of the school monitoring sites **recorded annual average levels in compliance with the set air quality standards for NO<sub>2</sub>.**

30. **NRW Citizen Science Project-** funded externally by Natural Resources Wales (NRW) as part of the Citizen Science project, commissioned in April 2019, air quality monitoring services was provided by SRS on behalf of Cardiff Council for a number of schools premises located in Cardiff;

- Rhiwbeina Primary School;
- Thornhill Primary School;
- St Monica's CIW Primary School;
- Millbank Primary School;
- Lansdowne Primary School; and
- St Mary The Virgin Church in Wales Primary School

31. These particular schools were chosen based upon local knowledge of the area, previous history, as well as focusing upon annual average daily traffic (AADT) flows of nearby road networks.

32. The objective of the monitoring project was to examine and record levels of nitrogen dioxide (NO<sub>2</sub>), a known traffic derived pollutant. The project was funded for one year, whereby the datasets collected were intended to be used a driver to work with the monitored schools to influence behavioural change and raise awareness for air quality concerns.
33. Annual datasets (2019) gathered at each of the school monitoring sites **recorded annual average levels in compliance with the set air quality standards for NO<sub>2</sub>.**
34. Unfortunately, NRW have confirmed that there is no available budget to financially support the project any further, however Cardiff Council has given financial commitment to continue for one further year.
35. Due to the unprecedented circumstances, current monitoring at school locations referenced above (Client Earth and Citizen Science project endorsed schools) has temporarily stopped as internal risk assessments deemed the sampling at these locations non-essential with the view that the risk of accessing the locations outweighs the benefits of the sampling. Monitoring at these locations will recommence when it is deemed viable to revisit the monitoring.
36. **Traffic Regulation Order (TRO) Project-** In view of the corporate commitment to deliver active travel plans for all schools by April 2022, for 2019 SRS was commissioned by Cardiff Council's Transportation, Policy and Strategy Team to assist with Cardiff Council's Schools Streets Project and its Traffic Regulation Order (TRO) pilot project. The pilot project involves the temporary closure of road links surrounding specific schools in Cardiff, 6 in total.
  - Whitchurch High Lower;
  - Ysgol Melin Gruffydd;
  - Peter Lea Primary;
  - Llandaff Church in Wales Primary;
  - Pencaeru; and
  - Lansdowne Primary
37. Shared Regulatory Services (SRS) have supported this pilot project by providing additional air quality monitoring since October 2019. Results will be published in the 2021 Annual Air Quality Progress Report which will report on 2020 datasets.

## Results in AQMAs

### City Centre AQMA

38. It is apparent that annual average NO<sub>2</sub> datasets in the City Centre, in and around the AQMA, continue to be elevated in 2019. Despite the elevated figures it is encouraging that the captured figures all evidence a reduction

in annual average levels. However, based on figures in recent years, City Centre AQMA monitoring locations, specifically sites 186 & 187 located on Castle Street depict levels not only in breach of the annual average objective, but have been shown in recent years to record levels encroaching upon the 1-hour NO<sub>2</sub> objective with results close to 60µg/m<sup>3</sup>. To note, sites 186 & 187 are of a commercial nature and therefore the 1-hour objective applies at these locations.

### **Ely Bridge AQMA**

39. Monitoring undertaken within the Ely Bridge AQMA, at the façade of residential properties (Site 117, 192 & 218) recorded annual average levels of NO<sub>2</sub> >35ug/m<sup>3</sup>. Although levels captured are compliant with the air quality objectives, they are still of a concern and thus the AQMA should remain in place.

### **Llandaff AQMA**

40. Residential monitoring locations within the Llandaff AQMA, in general indicate compliance with the annual average objective. Site 212 does indicate an exceedance of the annual average objective with an annual average reading of 41.3ug/m<sup>3</sup>. When comparing the 2018 datasets with that of 2019, an improvement is noted with an evidenced reduction in levels for all monitored locations.
41. In an effort to reassure local residents, as referenced in the 2018 APR, officers have explored the idea of improving monitoring capabilities in the Llandaff AQMA by investing in an automated monitoring system. SRS who had successfully accrued funding via a S106 planning contribution, purchased a near real-time indicative air quality monitor (AQ Mesh analyser) which has been installed within the Llandaff AQMA boundary.

### **Stephenson Court, Newport Rd, AQMA**

42. All three monitoring sites within the Stephenson Court AQMA (Sites, 81, 131 & 198) show compliance with the annual average objective, however results remain elevated, particularly at Site 131(>35ug/m<sup>3</sup>), and thus the AQMA will be maintained

### **Summary of Results in the AQMAs**

43. Table 1 below summarises the worse-case annual average figure recorded at a residential location within each of the 4 AQMAs. The figure outlined is not a portrayal of the same monitoring site year on year. For example, the 2019 result given for the Llandaff AQMA is the result derived by Site 212 which demonstrates the highest figure recorded at a residential location in 2019. Prior to this, the 2018 figure was given by Site 33, which was the highest validated result at a residential location in 2018.

**Table 1. Annual Average NO<sub>2</sub> Concentration (µg/m<sup>3</sup>) Air Quality Standard =40 µg/m<sup>3</sup>**

AQMA	Annual Average NO <sub>2</sub> Concentration (µg/m <sup>3</sup> ) Air Quality Standard =40 µg/m <sup>3</sup>							
	2012	2013	2014	2015	2016	2017	2018	2019
City Centre	41.5	42.1	42.1	38.2	38.7	38.2	37.3	35.6
Stephenson Court	47.9	43.9	41.2	39.5	39.6	36.7	38.2	35.7
Ely Bridge	42.6	44.9	42.3	39.5	41.3	38	39.9	38.6
Llandaff	43.0	39.1	37.2	32.3	35.0	32.5	32.5	41.3

44. Although the 2019 data indicates that compliance is met in the three AQMAs, the Welsh Government has stated that *'air just barely compliant with the objectives is not 'clean' and **still carries long-term health risks** and while compliance with the national air quality objectives is essential, it is desirable to keep levels of pollution as low as reasonable practicable.'*<sup>7</sup>

### **Action Plans and Development of a Clean Air Strategy**

45. Section 84 of the Environment Act 1995 ensures that action must then be taken at a local level which is outlined in a specific Air Quality Action Plan (AQAP) to ensure that air quality in the identified area improves. Therefore, Cardiff Council has a statutory requirement to produce an Air Quality Action Plan (AQAP) for each identified AQMA.
46. In 2017 the Council gave a commitment to produce a Clean Air Strategy and Action Plan by 2018. This objective of this report was to develop an Action Plan to address air quality issues not only in the AQMAs, but across all of Cardiff.
47. Highlighting this commitment, in 2018, SRS & CC developed a citywide Clean Air Strategy & Action Plan (CASAP) for Cardiff. The strategy coincides with Cardiff's Capital Ambition report and helps to implement and deliver the priorities outlined in the Ambition report with an overarching aim to improve air quality to protect and improve public health in Cardiff. The CAS & Action Plan appoints strategic measures that will look to generate a positive impact to citywide air quality levels, in particular traffic derived NO<sub>2</sub> levels. Each measure has endured a cost benefit appraisal procedure by weighting the measures in terms of air quality impact, cost and timescale. The key theme of the strategic measures is to increase the uptake of sustainable modes of transport by influencing a behavioural change in Cardiff.
48. The CASAP fulfils the requirements of the LAQM process to produce an Air Quality Action Plan (AQAP).

### **Legal Direction from Welsh Government**

49. In addition to Cardiff's 4 AQMAs and CASAP work, following the formal publication of Defra's UK detailed air quality plan to tackle roadside

<sup>7</sup> [Welsh Government Local air quality management in Wales Policy guidance June 2017](#)

nitrogen dioxide (NO<sub>2</sub>) concentrations in July 2017, it was identified that Cardiff would continue to exceed EU & UK Air Quality Directive Limit Values for NO<sub>2</sub> beyond 2020.

50. The report detailed modelled projections from the Joint Air Quality Unit (JAQU) which showed continued non-compliance of the national annual average NO<sub>2</sub> standard beyond 2021 along identified road networks. The roads which have been modelled as exceeding the annual limit value were the A4161, the A4232, the A4234, the A470 and the A48. These areas of exceedance also featured in the CASAP document as any mitigation measures implemented on the referenced road links will have an impact on the LAQM AQMAs.
51. As a result, in March 2018 under Part IV of the Environment Act 1995, Section 85(7), Welsh Government issued a formal direction to CC to address its air quality concerns, with particular reference to the specified 5 road links. The direction has been governed by the Welsh Minister for Environment who has determined that the direction deemed necessary to meet obligations placed upon the United Kingdom under the EU Ambient Air Quality Directive (2008/50/EC).
52. The direction came into force, as signed by the Minister, on 15<sup>th</sup> February 2018, and was delivered to Cardiff Council on 09<sup>th</sup> March 2018. The direction has a schedule of specified activities, and states:

*‘Under the Environment Act 1995 (Feasibility Study for Nitrogen Dioxide Compliance) Air Quality Direction 2018, the Welsh Ministers make this direction having determined that it is necessary in order to meet obligations placed upon the United Kingdom under the EU Ambient Air Quality Directive.*

*Cardiff Council will undertake, as part of the UK plan for tackling roadside nitrogen dioxide concentrations 2017, a feasibility study in accordance with the HM Treasury’s Green Book approach, to identify the option which will deliver compliance with legal limits for nitrogen dioxide in the area for which the authority is responsible, in the shortest possible time.’*
53. Further to the Councils statutory duty under Part IV of the Environment Act, the Direction placed, a further legal duty on Cardiff Council to undertake the requirements of the direction as detailed above within the specified timescales
54. Cardiff Council has developed a Clean Air Project Team who have met the necessary reporting requirements outlined by the Direction.
55. The Council’s published [Full Business Case](#) (Final Plan) documents early intervention measures as well as aspired measures the Council are endorsing to improve localised air quality on the outlined A4161 Castle Street with a vision of improving citywide air quality levels. These measures include;

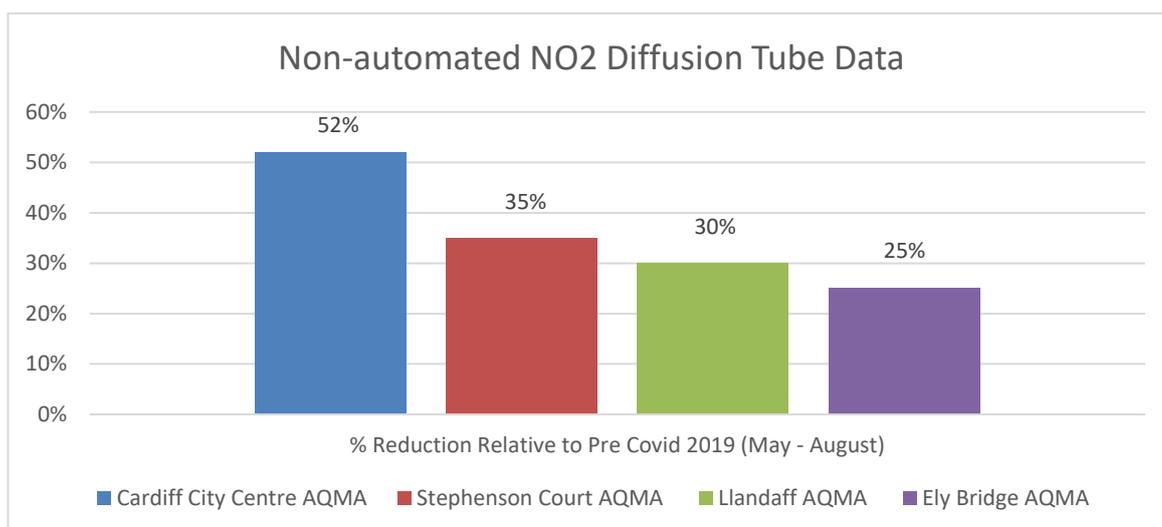
- Implementation of Electric Buses – 36 Electric Buses to be implemented on a number of routes within the City Centre;
  - Bus Retro Fitting Programme;
  - Taxi Licensing Policy and Mitigation Scheme;
  - City Centre Transportation Improvements; and
  - Active Travel Measures.
56. The FBC demonstrates that the outlined package demonstrates the greatest level of compliance on Castle Street, with 31.9µg/m<sup>3</sup> forecasted in 2021 as a result of the implementation of the measures. In addition to achieving compliance on Castle Street, the impact of the package of measures was also been modelled at local air quality monitoring locations, including those locations within existing Air Quality Management Areas (AQMAs). The results of the modelling indicated that all monitoring locations are expected to have concentrations below the 40 µg/m<sup>3</sup> which further demonstrates that the package of measures will improve local air quality including within existing AQMAs.
57. The feasibility Study and FBC document ultimately becomes a citywide Action Plan to address air quality, as the project to date has not only focussed on roads modelled to exceed the NO<sub>2</sub> limit value, but has also assessed likely compliance within the AQMAs.
58. The FBC was approved by the Environment Minister on the 16<sup>th</sup> December 2019, with grant funding to implement the plan awarded in January 2020. Work is progressing on the implementation of the measures detailed in the plan. It is noted that the implementation has been impacted by the COVID-19 pandemic, but constant dialogue and ongoing collaboration with Welsh Government officials has been maintained to ensure the Plan remains on course to deliver compliance in the shortest possible time. The 2021 annual progress report will provide full details on the progression of the Clean Air Plan along with the review of 2020 results and subsequent impacts of the COVID-19 pandemic.

### **COVID- 19 Implications for Air Quality in Cardiff**

59. Due to the unprecedented circumstances, this has had an impact on the local air quality monitoring and the delivery of the package of measures sanctioned by Cardiff's Clean Air Plan (FBC).
60. Due to constant dialogue and ongoing collaboration with Welsh Government officials, the Plan remains on course to deliver compliance in the shortest possible time. During the COVID-19 pandemic local air quality monitoring has continued in Cardiff, however some non-automated results for a few selected months in 2020 will not be available for next year's reporting due to 'lockdown' measures introduced in the month of March 2020. Local Authorities including SRS at the time of the 'lockdown' measures being imposed looked for official clarity to ascertain if the monitoring was classified as essential in view of quietened road networks which may lead to a favourable bias, as well as difficulties faced by analytical laboratories utilised by SRS which had to adapt their working practises which added to postage delays.

61. Following those initial discussions, air quality data collection has been deemed as an essential service by Welsh Government, whereby monitoring was resumed for May 2020. The results for 2020, which will be recorded in the 2021 Annual Progress Report will need to be corrected/ratified to account for the gaps in the annual datasets incurred by the COVID situation. The exclusion of this data will be further discussed, however at this moment in time, results gathered during the COVID pandemic, where it is apparent that road traffic volumes have decreased significantly are perhaps not representative of a true business as usual scenario which could generate a bias/ underestimate of levels.
62. Some indicative analysis has been undertaken to ascertain what impact the current pandemic has had on air quality levels, especially within the established AQMAs. Comparative exercises have been undertaken to observe a change in levels between certain time periods, for example a comparison to previous years' results which examines a pre covid time period with that of a covid impacted time period. To note it is not viewed as a preferable indicator to directly compare to previous years' data given influencing meteorological conditions, however the exercise is useful to populate indicative trends/ visualise impacts.

**Figure 1 - Previous year comparison (2019)**



### **Well-being of Future Generations (Wales) Act 2015 implications**

63. SRS & CC adopt the principles of The Well-being of Future Generations (Wales) Act 2015 (WFG). The act is a significant enabler to improve air quality as it calls for sustainable cross-sector action based on the principles of long-term, prevention-focused integration, collaboration and involvement. It intends to improve economic, social, environmental and cultural well-being in Wales to ensure the needs of the present are met without compromising the ability of future generations to meet their own needs.
64. The Well-Being of Future Generations (Wales) Act 2015 places a 'well-being duty' on public bodies aimed at achieving seven national well-being

goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible.

65. In discharging its duties under the 2015 Act, the Council has set and published well-being objectives designed to maximise its contribution to achieving the national well-being goals. The well-being objectives are set out in Cardiff's Corporate Plan 2020-23:  
<https://www.cardiff.gov.uk/ENG/Your-Council/Strategies-plans-and-policies/Corporate-Plan/Documents/Designed%20Corporate%20Plan%202020-23%20Final%20ENG.pdf>
66. When exercising its functions, the Council is required to take all reasonable steps to meet its well-being objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the well-being objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.
67. The well-being duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:
- Look to the long term;
  - Focus on prevention by understanding the root causes of problems;
  - Deliver an integrated approach to achieving the seven national well-being goals;
  - Work in collaboration with others to find shared sustainable solutions; and
  - Involve people from all sections of the community in the decisions which affect them

### **Reason for Recommendations**

68. To enable Cardiff Council to submit the Annual Progress Report on Local Air Quality Management to Welsh Government.

### **Financial implications**

69. SRS has an existing budget to complete a programme of air quality management and monitoring across Cardiff. The measures proposed and submitted to Welsh Government to achieve compliance with the Air Quality Legal direction have been agreed by Welsh Government. Welsh Government has awarded the subsequent funding to support the implementation of these measures.

## Legal Implications

70. The recommendations in this report do not raise any direct legal implications, they are mainly to note the results gathered and to approve the progress report to be sent to Welsh Government as part of the Council's ongoing reporting requirements.
71. The legislative framework is set out in the body of the report. The decision maker needs to be satisfied that they have all the relevant information before making any decision. In addition, when considering this matter the decision maker should have regard to the general legal advice set out below.

## General Advice

72. Any decision must (a) be within the legal powers of the Council; (b) comply with any procedural requirement imposed by law; (c) be within the powers of the body or person exercising powers on behalf of the Council; (d) be undertaken in accordance with the procedural requirements imposed by the Council e.g. standing orders and financial regulations; (e) be fully and properly informed; (f) be properly motivated; (g) be taken having regard to the Council's fiduciary duty to its tax payers; and (h) be reasonable and proper in all the circumstances and comply with any equalities legislation.
73. The Council also has to satisfy its public sector duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The Protected characteristics are: age, gender reassignment, sex, race – including ethnic or national origin, colour or nationality, disability, pregnancy and maternity, marriage and civil partnership, sexual orientation, religion or belief – including lack of belief.
74. The Well-Being of Future Generations (Wales) Act 2015 ("the Act") places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales – a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible.
75. In discharging its duties under the Act, the Council has set and published well-being objectives designed to maximise its contribution to achieving the national well-being goals. The well-being objectives are set out in Cardiff's Corporate Plan 2020-23: <https://www.cardiff.gov.uk/ENG/Your-Council/Strategies-plans-and-policies/Corporate-Plan/Documents/Designed%20Corporate%20Plan%202020-23%20Final%20ENG.pdf>
76. The well-being duty also requires the Council to act in accordance with 'sustainable development principle'. This principle requires the Council to act in a way, which seeks to ensure that the needs of the present are met without comprising the ability of future generations to meet their own

needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:

- Look to the long term
- Focus on prevention by understanding the root causes of problems
- Deliver an integrates approach to achieving the 7 national well-being Goals
- Work in collaboration with others to find shared sustainable solutions
- Involve people from all sections of the community in the decisions which affect them

77. The decision maker must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible using the link below: <http://gov.wales/topics/people-and-communities/people/futuregenerations-act/statutory-guidance/?lang=en>

78. The Council has to be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards when making any policy decisions and consider the impact upon the Welsh language, the report and Equality Impact Assessment deals with all these obligations. The Council has to consider the Well-being of Future Guidance (Wales) Act 2015 and how this strategy may improve the social, economic, environmental and cultural well-being of Wales.

### **HR Implications**

79. There are no HR implications to this report.

### **Property Implications**

80. No immediate property implications are anticipated from the Cardiff Annual Air Quality Progress Report 2020.

81. Any future requirement to use Council land or property to deliver the objectives of the Cardiff Annual Air Quality Progress Report 2020 should be done so in accordance with the Corporate Property Strategy, Council's Asset Management process and in consultation with Strategic Estates and relevant service areas.

## **RECOMMENDATIONS**

Cabinet is recommended to:

1. note and accept the monitored results gathered in 2019;
2. Approve the review of the non-automated monitoring network for NO<sub>2</sub>, whereby those monitoring sites displaying continued compliance with limit values are decommissioned.

3. Approve the 2020 Annual Progress Report (as attached as Appendix 1) for submission to Welsh Government for approval.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Andrew Gregory</b> <b>Director of Planning, Transport &amp; Environment</b>
	11 December 2020

*The following appendix is attached:*

Appendix 1: Cardiff Council Annual Air Quality Progress Report 2020.

This page is intentionally left blank



# 2020 Annual Air Quality Progress Report for Cardiff Council

In fulfillment of Part IV of the  
Environment Act 1995  
Local Air Quality Management

October 2020



<b>Local Authority Officer</b>	Craig Lewis
<b>Department</b>	Specialist Enterprise Services
<b>Address</b>	City Hall, Cardiff, CF10 3ND
<b>Telephone</b>	
<b>E-mail</b>	Craig.Lewis@cardiff.gov.uk
<b>Report Reference number</b>	LAQM.2020PR
<b>Date</b>	16 <sup>th</sup> October 2020

## Executive Summary: Air Quality in Our Area

### Public Health

What has become distinctly apparent is that air Pollution is a local and national problem. Long-term exposure reduces life expectancy by increasing mortality, as well as increasing morbidity risks from heart disease and strokes, respiratory diseases, lung cancer and other effects.

What we know is that poor air quality in Wales poses as a significant concern for Public Health, regarded as the most significant environmental determinant of health. Its associated adverse risk to public health is particularly prevalent within urban areas and near major roads. The pollutants of primary concern for public health are particulate matter and primary/ secondary derived nitrogen dioxide (NO<sub>2</sub>). Both pollutants primarily originate from motor vehicles.

The UK expert Committee on the Medical Effects of Air Pollution (COMEAP) estimates that air pollution is responsible for “an effect equivalent of between 28,000 and 36,000 deaths (at typical ages) each year”. This does not mean there are ‘actual’ deaths from air pollution exposure; rather, that the reduced life expectancy which everyone experiences because of air pollution exposure (6-8 months on average, but could range from days to years) is ‘equivalent’ to between 28,000 and 36,000 deaths when summed. In Wales, based on the latest data available (for 2017), Public Health Wales estimates the burden of long-term air pollution exposure to be the equivalent of 1,000 to 1,400 deaths (at typical ages) each year.

Examining the most recent datasets (2017) made available by Public Health Wales for the total number of all-cause non-accidental deaths registered in the Cardiff and Vale University Health Board area, the long term mortality burden attributable to air pollution (fine particulate matter and nitrogen dioxide combined) is an estimated effect equivalent to 178- 227 deaths.

Despite the efforts made by national government and local authorities there is an apparent disconnection between air quality management and Public Health. The status of Air quality management in Wales focuses upon a hotspot approach and fails to reference other factors such as socioeconomic status or exposure to other environmental determinants of health.

Fundamentally, it is plausible that air pollution affects everyone to some extent. Whilst the legislative air quality limit values are based on epidemiological evidence and are ultimately intended to protect public health, there is also recognition that health effects may be experienced below these thresholds for some of the key pollutants (e.g. PM<sub>2.5</sub> and NO<sub>2</sub>), particularly affecting most susceptible groups: young children, the elderly and those with pre-existing health conditions and comorbidities. Acknowledged as the triple jeopardy concept- air pollution combines with other aspects of the social and physical environment to create an inequitable disease burden on more deprived parts of society; populations of areas with low socioeconomic status are prone to exacerbated effects from exposure to air pollution, in part as they are more likely to suffer pre-existing health conditions as a result of their poorer living conditions and lifestyle, but also as they are more vulnerable, being more likely to be living in areas with higher levels of air pollution.

## Air Quality in the City of Cardiff Council

Local authorities have a statutory duty under Part IV of the Environment Act 1995 & Air Quality Strategy for England, Scotland, Wales and Northern Ireland 2007 to manage local air quality. Under Section 82 of the Environment Act 1995 the Local Air Quality Management (LAQM) process places an obligation on all local authorities to regularly review and assess air quality in their areas, and to determine whether or not air quality objectives are likely to be achieved.

The air quality objectives applicable to LAQM in Wales are set out in the Air Quality (Wales) Regulations 2000, No. 1940 (Wales 138) and Air Quality (Amendment) (Wales) Regulations 2002, No 3182 (Wales 298). Where the air quality reviews indicate that the air quality objectives may not be met the local authority is required to designate an Air Quality Management Area (AQMA). Action must then be taken at a local level and outlined in a specific Air Quality Action Plan (AQAP) to ensure that air quality in the identified area improves.

In line with the Cardiff Council's (CC) statutory duties under Part IV of the Environment Act 1995, Shared Regulatory Services (SRS) on behalf of CC undertakes regular air quality monitoring at specifically allocated locations across Cardiff using automated and non-automated principles for ambient air Nitrogen Dioxide (NO<sub>2</sub>), Particulate Matter (PM<sub>10</sub> & PM<sub>2.5</sub>), Sulphur Dioxide (SO<sub>2</sub>), Carbon Monoxide (CO) & Ozone (O<sub>3</sub>).

With regards to prioritising ambient air quality sampling locations, the Council adopts a risk-based approach to any allocation of monitoring sites, considering the requirements of The Department for Environment, Food and Rural Affairs' (Defra) Local Air Quality Management Technical Guidance 16 (TG16), February 2018. The designated monitoring locations are assigned based on relevant exposure and where the certain Air Quality Objective levels for a particular pollutant applies. TG16 states that annual mean objectives should apply at "All locations where members of the public might be regularly exposed. Building facades of residential properties, schools, hospitals, car homes etc."

### **Monitoring Network**

In 2019, Cardiff had three automatic air quality monitoring sites located at Frederick Street in the City Centre, Richard's Terrace, just off Newport Road and Lakeside Primary School.

#### **Cardiff Frederick Street (Urban Background)- AURN 1**

The site monitors on a 24/7 basis measuring levels of NO<sub>2</sub>, PM<sub>10</sub> & PM<sub>2.5</sub>, SO<sub>2</sub>, CO and O<sub>3</sub> feeding data directly into Defra's Automatic Urban and Rural Network (AURN).

#### **Richard's Terrace, Newport Road (Urban Traffic)- AURN 2**

The site monitors on a 24/7 basis measuring levels of NO<sub>2</sub> & PM<sub>10</sub> at that location, feeding data directly into Defra's Automatic Urban and Rural Network (AURN).

#### **Cardiff Lakeside (Urban Background)**

The site monitors on a 24/7 basis measuring levels of Polycyclic aromatic hydrocarbons (PAH) at that location, feeding data directly into Defra's PAH Digital (solid phase) Network. SRS serve as a local site operator to this site, however data interpretation is sanctioned by the consultants Ricardo Energy and Environment Ltd, whereby concentrations are compared to the national air quality objective for B[a]P in ambient air, based on an annual mean concentration of 0.25 ng/m<sup>3</sup>. Details can be found in the [UK Air Quality Strategy \(Defra, 2007\)](#). Therefore, the purpose of this site and results derived are not corresponded to any of the limit values outlined for the purposes of LAQM in Wales.

Summarised results for various pollutants for the outlined automatic monitoring stations can be found at <http://www.welshairquality.co.uk> & <https://uk-air.defra.gov.uk/interactive-map>

At the time of writing this report, Cardiff Council with the financial support of Welsh Government has commissioned a fourth automated monitoring site, located on Castle Street. The roadside site monitors on a 24/7 basis measuring levels of NO<sub>2</sub>, PM<sub>10</sub> & PM<sub>2.5</sub> at that location and forms part of the Welsh Automated Monitoring Network. Reporting for this site will be included in future reports.

In addition to the newly commissioned automated monitoring station on Castle Street, Cardiff Council has acquired the use of 6 near real time indicative air quality analysers. 5 analysers were purchased with the financial support of Welsh Government and the 6<sup>th</sup> analyser was facilitated by the SRS who had successfully accrued funding via a S106 planning contribution. The analysers have been specifically placed and represent relevant exposure. The analysers continuously monitor for Nitric Oxide, Nitrogen Dioxide & Ozone, PM10 & PM2.5, and do so every 15 minutes (data uploaded every hour). Information regarding the specification of the monitors can be viewed at <https://www.aqmesh.com/product/>. These monitors do not form part of the regulated Welsh automated monitoring network, but as specified they are an indicative form of monitoring and a useful tool to look at datasets on a high-resolution basis. An online platform to access the available datasets is yet to be finalised with Cardiff Council's webpage development team.

**Non-automatic Monitoring Sites-** In 2019 there were 100 specifically allocated non automatic monitoring sites across Cardiff which monitored levels of nitrogen dioxide (NO<sub>2</sub>). These sites are supported and maintained by SRS on behalf of the CC. The non-automatic sites do not provide live data; instead they consist of diffusion tubes which are placed at each of the sites, collected and replaced on a rolling monthly basis. The results derived from the tube sampling are then averaged over the year to enable a comparison of the results against the annual average (**40µg/m<sup>3</sup>**) and 1-hour (**200µg/m<sup>3</sup> not to be exceeded > 18 times per year**) air quality objectives for NO<sub>2</sub>.

#### Analysis of Diffusion Tubes

**Annual Average-** Once erroneous data have been deleted, it is necessary to calculate the annual average. The data need to be annualised, and then bias corrected. In order to do this, firstly the annual average is calculated for all sites.

**Annualisation-** Where valid data capture for the year is less than 75% (9 months), where necessary the continuous and NO<sub>2</sub> diffusion tube monitoring data have been "annualised" following the methods as described in Defra's LAQM (TG16), Boxes 7.9 & 7.10.

**Bias Adjustment-** After annualisation, the diffusion tubes should be corrected for bias. Bias represents the overall tendency of the diffusion tubes to under or over-read relative to the reference chemiluminescence analyser. This should not be confused with precision, which is an indication of how similar the results of duplicate or triplicate tubes are to each other. While it is possible to adjust diffusion tube results to account for bias, it is not possible to correct for poor precision. A spreadsheet-based tool has been developed that allows local authorities to easily calculate the bias and precision of their tubes.

There are two bias adjustment figures made available to Local Authorities. Firstly there is the Local Authorities' local bias adjustment figure calculated using a co-location study at a local reference automated site (Frederick Street being the site used in Cardiff), and secondly there is the national bias adjustment factor derived by all individual co-location studies undertaken that utilise the same laboratory and analytical techniques for diffusion tube analysis. It must be decided which factor to use based upon quality assurance and increased certainty.

The bias adjustment factor applied to Cardiff's 2019 data is 0.75. The applied bias adjustment factor has been calculated using the national diffusion tube bias adjustment factor spreadsheet version 09/20. Due to insufficient data capture <90%, in accordance with Defra's LAQM (TG16), Box 7.11 it is preferable not to perform a co-location study due to concerns associated with the data quality. The National Bias Adjustment Factor supplied by the LAQM Defra website, based on 42 studies, which appointed Socotec UK Ltd Didcot laboratory, gave a figure of 0.75 and so this has been adopted for ratification purposes.

**Distance Correction-** Where an exceedance is measured at a monitoring site not representative of public exposure, NO<sub>2</sub> concentration at the nearest relevant exposure has been estimated based on the "NO<sub>2</sub> fall-off with distance" calculator (<http://laqm.defra.gov.uk/tools-monitoring-data/no2-falloff.html>). The procedure is described in LAQM (TG16), Section 7.77-7.79.

For 2019 the NO<sub>2</sub> diffusion tube network was extensively reviewed and amended to improve and encapsulate a wider footprint of the Cardiff Council area. As part of the improvements new monitoring sites were commissioned within the designated AQMAs, as well new sites commissioned in support of project related work that required air quality monitoring datasets. Such project work included a Citizen Science project funded by Natural Resources Wales (NRW). Some sites were decommissioned during the sampling year due to ongoing nearby construction works which caused damage or obstructed the monitoring site.

#### **Summary of results collated in 2019**

**Automated monitoring-** Results highlighted in **Section 2.2** of this report indicate compliance with the relevant air quality standards applicable for the purpose of LAQM in Wales.

**Non- automated monitoring-** In 2019, 6 NO<sub>2</sub> diffusion tube locations recorded exceedences of the annual average objective set for NO<sub>2</sub> (40µg/m<sup>3</sup>). All 6 exceedences were documented within the already established City Centre and Llandaff air quality management areas (AQMA).

In accordance with Welsh Government's (WG) Local Air Quality Management Policy Guidance, July 2017, SRS and CC recognise that there is no defined "safe level" when describing levels of air quality. It is noted that the annual average datasets do highlight monitoring sites established outside the designated AQMA areas with elevated annual average NO<sub>2</sub> readings. These sites will need to be closely scrutinised to ensure the annual average objective is not breached in future years. This is discussed in further detail in **Section 2.2**

**Air Quality Management Areas**

Air Quality Management Areas (AQMAs) are declared when air quality is close to or above an acceptable level of pollution, known as the air quality standard/ objective

Based on monitoring results and further detailed assessments, there are currently four Air Quality Management Areas (AQMAs) declared across Cardiff which have all been declared due to exceedances of the annual mean NO<sub>2</sub> Air Quality Standard (40ug/m<sup>3</sup>), known to be predominantly derived from road transport sources.

1. **Cardiff City Centre**- declared 1<sup>st</sup> April 2013
2. **Llandaff**- declared 1<sup>st</sup> April 2013
3. **Stephenson Court**- declared 1<sup>st</sup> December 2010
4. **Ely Bridge**- declared 1<sup>st</sup> Feb 2007

**Figure 1- Boundary of Cardiff City Centre AQMA**

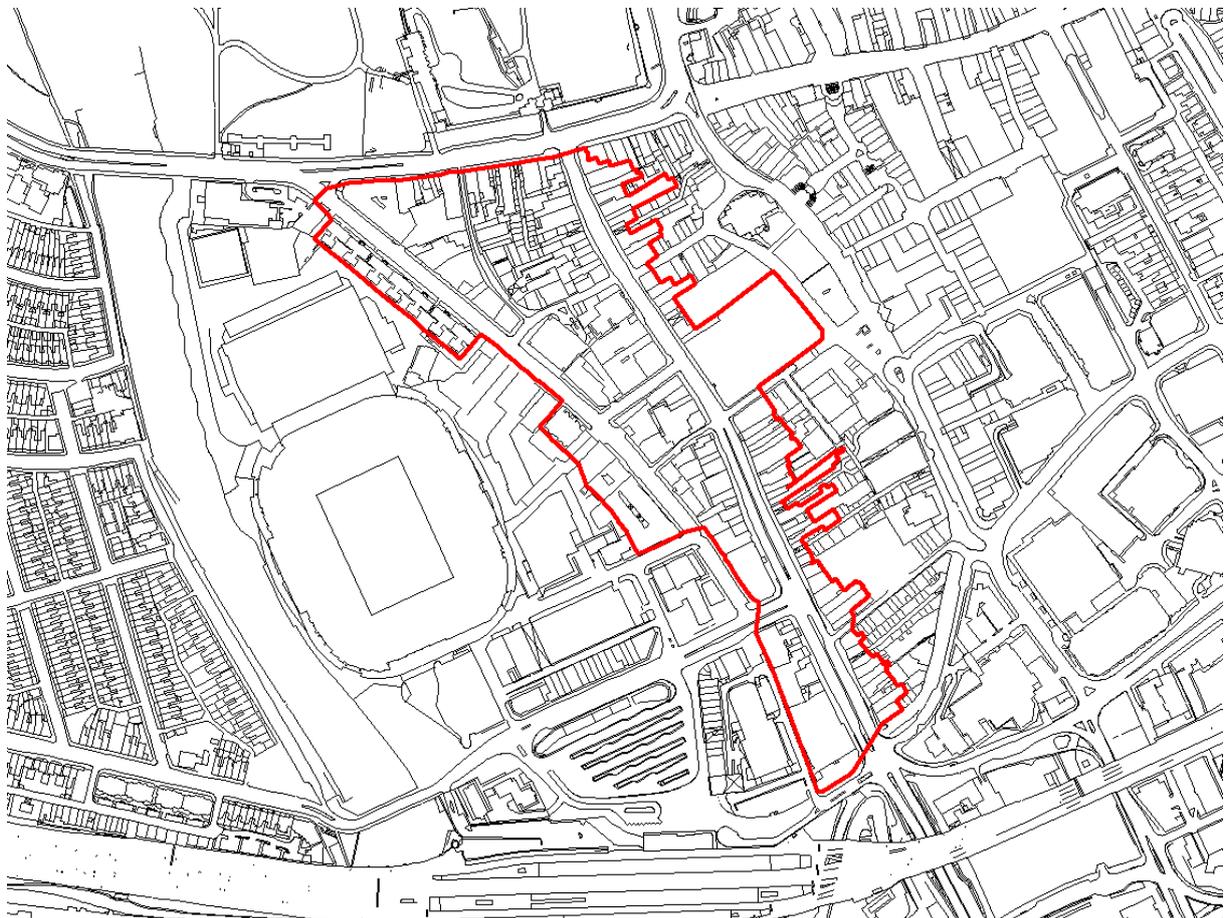
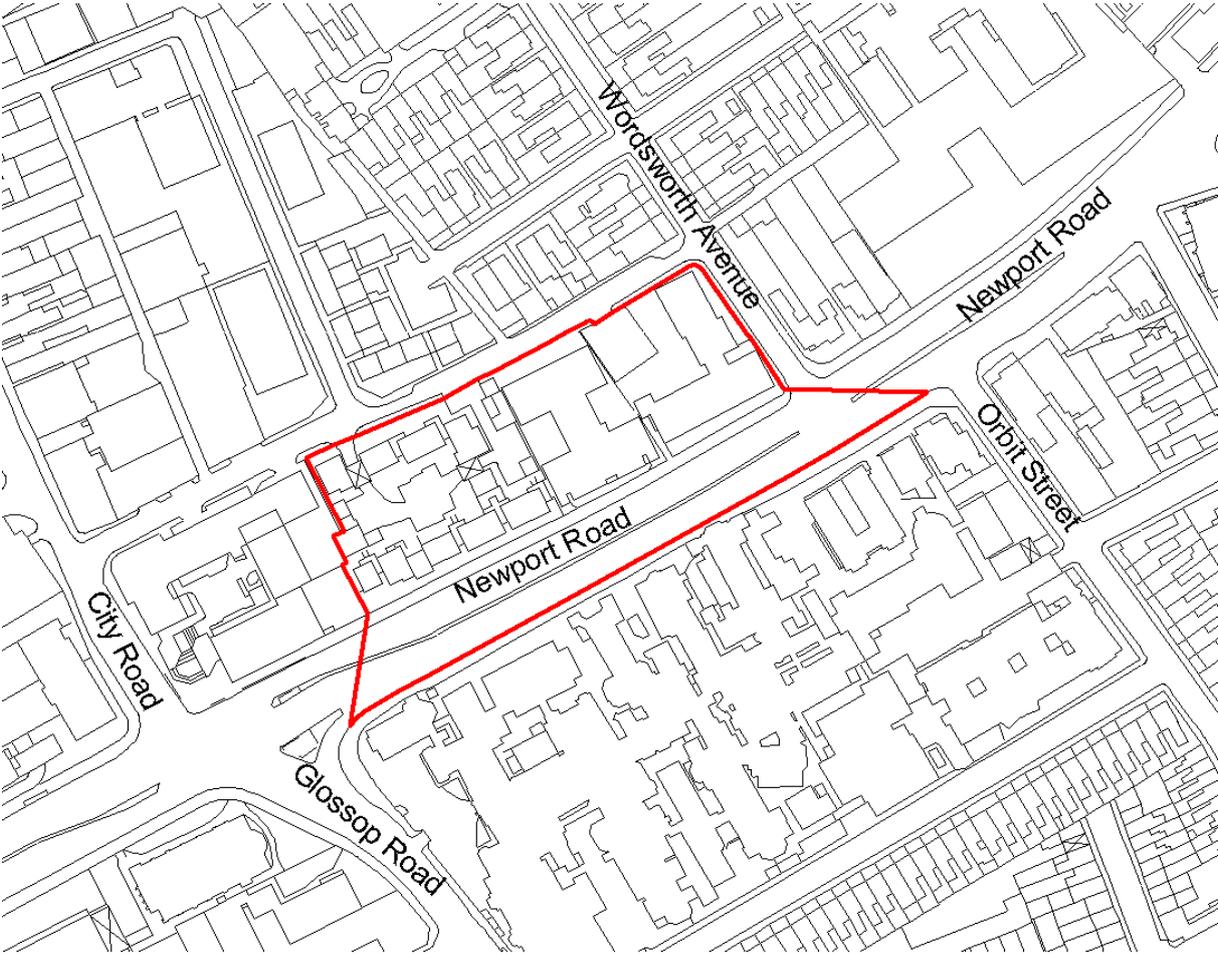


Figure 2- Boundary of Ely Bridge AQMA



Figure 3- Boundary of Stephenson Court AQMA

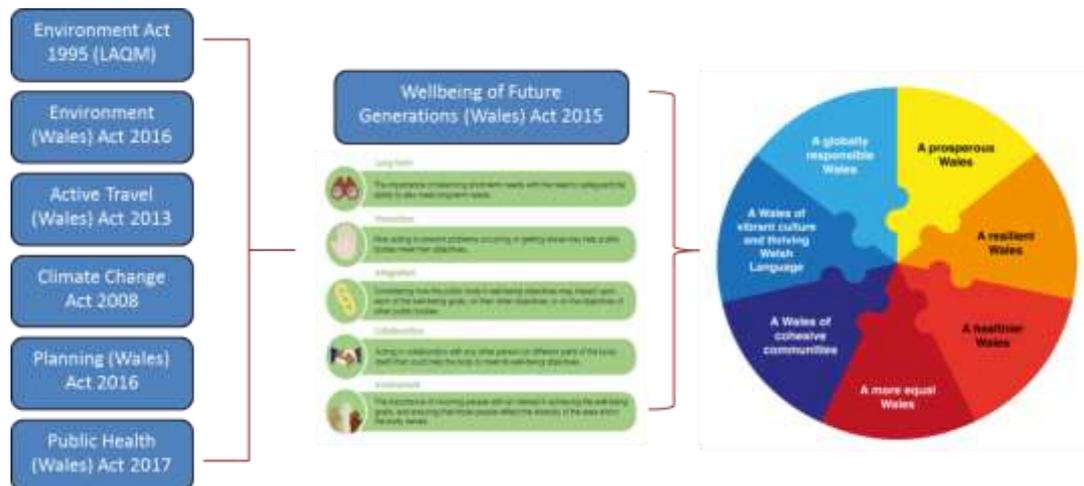


**Figure 4- Boundary of Llandaff AQMA**

SRS/ CC adopts the principles of The Well-being of Future Generations (Wales) Act 2015. The Act is a significant enabler to improve air quality as it calls for sustainable cross-sector action based on the principles of long-term, prevention-focused integration, collaboration and involvement. It intends to improve economic, social, environmental and cultural well-being in Wales to ensure the needs of the present are met without compromising the ability of future generations to meet their own needs. The Act places responsibilities on public bodies in Wales to work in new ways (including via Public Services Boards) towards national Well-being goals. Progress is measured against a suite of well-being and Public Health Outcomes Framework indicators; there is one specifically concerned with air pollution.

As **Figure 5** illustrates, the Act is the legislative vehicle for “Health in all Policies in Wales” and provides the underpinning principles for all policy and decision making, including economic development, in Wales. Reducing air pollution, health risks and inequalities can help contribute to most, if not all, of the well-being goals. As such, the Act presents excellent opportunities to change policy and practice to enhance air quality management arrangements across Cardiff (and wider).

Figure 5- The Well- being of Future Generations (Wales) Act 2015 Matrix



SRS and CC are very aware of the concerns for air quality impacts. SRS & CC is committed to achieving levels as low as reasonably practicable by demonstrating levels beyond the annual objectives set for pollutants. In order to improve the air quality in Cardiff, action needs to be taken across the city as a whole. The main air pollutants which cause a public health concern and primarily worsen air quality in Cardiff are particulate matter and primary/ secondary derived nitrogen dioxide (NO<sub>2</sub>), derived by transport vehicles.

Welsh Government’s publication; Local Air Quality Management, Policy Guidance, June 2017 recommended two clear goals:

- (1) achieve compliance with the national air quality objectives in specific hotspots; and
- (2) reduce exposure to pollution more widely, so as to achieve the greatest public health benefit.

Collective efforts, therefore, should look beyond targeted action in localised air pollution hotspots and do this in parallel with universal action to reduce risks for everyone.

Section 84 of the Environment Act 1995 ensures that action must then be taken at a local level which is outlined in a specific Air Quality Action Plan (AQAP) to ensure that air quality in the identified area improves. After declaring an AQMA the authority must prepare a **DRAFT** Air Quality Action Plan (AQAP) within 18 months setting out measures it intends to put in place to improve air quality to at least the air quality objectives, if not even better. The AQAP must be **formally** adopted prior to 24 months has elapsed. AQMA(s) are seen by local authorities as the focal points to channel resources into the most pressing areas of pollution as a priority.

In view of the statutory obligation to produce an AQAP for each AQMA, in 2019 SRS & CC developed a citywide Clean Air Strategy & Action Plan (CASAP) for Cardiff. The strategy is an evolving document and coincides with Cardiff’s Capital Ambition report, helping to implement and deliver the priorities outlined in the Ambition report with an overarching aim to improve air quality to protect and improve public health in Cardiff. The CAS & Action Plan appoints strategic measures that will look to generate a positive impact to citywide air quality levels, in particular traffic derived NO<sub>2</sub> levels. Each measure has endured a cost benefit appraisal procedure by weighting the measures in terms of air quality impact, cost and timescale. The key theme of the strategic measures is to increase the uptake of sustainable modes of transport by influencing a behavioural change in Cardiff. The CASAP fulfils the requirements of the LAQM process to produce an Air Quality Action Plan (AQAP).

### Welsh Government Legal Direction & Feasibility Study

In addition to Cardiff's 4 AQMAs and CASAP work, following the formal publication of Defra's UK detailed air quality plan to tackle roadside nitrogen dioxide (NO<sub>2</sub>) concentrations in July 2017, it was identified from air quality monitoring undertaken by Cardiff Council (CC) and modelled projections from WG that Cardiff would continue to exceed EU & UK Air Quality Directive Limit Values for NO<sub>2</sub> beyond 2020. The report detailed modelled projections from the Joint Air Quality Unit (JAQU) which showed continued non-compliance of the national annual average NO<sub>2</sub> standard by 2021 along identified road networks. The roads which have been modelled as exceeding the annual limit value are the A4161, the A4232, the A4234, the A470 and the A48. These areas of exceedence are also featured in the CAS & Action Plan document as any mitigation measures implemented on the referenced road links will have an impact on the LAQM AQMAs.

As a result of the detail in the UK Plan, and a subsequent High Court ruling, in March 2018, under Part IV of the Environment Act 1995, Section 85(7), WG issued a formal direction to CC to address its air quality concerns, with particular reference to the specified 5 road links. The direction has been governed by the Welsh Minister for Environment who has determined that the direction deemed necessary to meet obligations placed upon the United Kingdom under the **EU Ambient Air Quality Directive (2008/50/EC)**.

The Direction specified that CC had to undertake a feasibility study in accordance with the HM Treasury's Green Book approach, to identify the option which will deliver compliance with legal limits for nitrogen dioxide in the area for which the authority is responsible, **in the shortest possible time**.

Cardiff Council has developed a Clean Air Project Team who have met the necessary reporting requirements outlined by the Direction.

The results of the local modelling presented in the Initial Plan, differed to that undertaken by Defra using the Pollution Climate Mapping model. Defra's modelling identified two road links under baseline conditions which were projected to show non-compliance beyond 2021, namely the A48 and the A4232. The localised modelling identified only one road link under baseline conditions projected to show non-compliance beyond 2021, this being the A4161 Castle Street, in the City Centre.

Within the Initial Plan Report a long list of measures developed from the CASAP were qualitatively assessed against a primary objective of achieving compliance with set air quality objectives in the shortest possible time. The measures were considered against secondary objectives and were subjected to further qualitative assessments against the WelTAG Well-being Aspects.

The Council's published [Full Business Case](#) (Final Plan) documents early intervention measures as well as aspired measures the Council are endorsing to improve localised air quality on the outlined A4161 Castle Street with a vision of improving citywide air quality levels. These measures include;

- Implementation of Electric Buses – 36 Electric Buses to be implemented on a number of routes within the City Centre;
- Bus Retro Fitting Programme;
- Taxi Licensing Policy and Mitigation Scheme;
- City Centre Transportation Improvements; and
- Active Travel Measures.

The FBC demonstrates that the outlined package demonstrates the greatest level of compliance on Castle Street, with 31.9µg/m<sup>3</sup> forecasted in 2021 as a result of the implementation of the measures. In addition to achieving compliance on Castle Street, the impact of the package of measures was also been modelled at local air quality monitoring locations, including those locations within existing Air Quality Management Areas (AQMAs). The results of the modelling indicated that all monitoring locations are expected to have concentrations below the 40 µg/m<sup>3</sup> which further demonstrates that the package of measures will improve local air quality including within existing AQMAs.

The final plan was approved by the Minister on the 16<sup>th</sup> December 2019, with grant funding to implement the plan awarded in January 2020. Work is progressing on the implementation of the measures detailed in the plan. It is noted that the implementation has been impacted by the COVID-19 pandemic, but constant dialogue and ongoing collaboration with Welsh Government officials has been maintained to ensure the Plan remains on course to deliver compliance in the shortest possible time. The 2021 annual progress report will provide full details on the progression of the Clean Air Plan along with the review of 2020 results.

### **Welsh Government, Clean Air Plan for Wales, Healthy Air Healthy Wales**

At the time of drafting this report Welsh Government (WG) has published its latest plan which underpins its commitment and long-term ambition to improve air quality in Wales. The plan sets out WG's policy direction and proposed actions to reduce air pollution to support improvement in public health and the natural environment. Actions are proposed across four thematic themes, examined as People, Environment, Prosperity and Place.

The plan and its proposed actions is available at

<https://gov.wales/sites/default/files/publications/2020-08/clean-air-plan-for-wales-healthy-air-healthy-wales.pdf>

SRS/ CC support the aspirations of the plan and welcome the development of more stringent mitigation measures that will enable a cohesive approach to air quality management and protecting public health and the natural environment.

## **Actions to Improve Air Quality**

As discussed previously CC currently has 4 established AQMAs within its Borough.

The CASAP encapsulates all established AQMAs in Cardiff and sets out the delivery of how Cardiff is set to tackle air quality concerns on a citywide basis. The document considers an array of mitigation measures that should be considered when trying to improve citywide air quality levels. SRS & CC have collaboratively made progress in examining avenues and mechanisms to assist with bringing strategic measures to fruition and therefore enhancing key areas that will in turn improve air quality.

As outlined the CASAP measures have formulated the foundations for Cardiff's Legal Direction, therefore subject to Welsh Government's final verdict on the submitted Full Business Case, finances may be available to support the some of the CASAP measures.

## Public Transport

### Improving Bus Networks

#### ULEB (Ultra-low emission bus vehicles)

In 2018 SRS along with Cardiff Council's Transport team collaborated with Cardiff Bus company to put forward a successful bid application for the Ultra-Low Emission Bus (ULEB) fund made available by the Department for Transport (DfT).

The proposal draws links between the air quality management areas (AQMAs) identified under the LAQM regime, as well as the issued direction from Welsh Ministers which targets Cardiff on the regional scale highlighting non-conformities in association with European Directives. Therefore linking the two together; due to the heightened profile of air quality and its potential adverse impact on public health, and given Cardiff's Local Air Quality Management scenario, as well as its regional air quality concerns it is imperative that short term measures, such as increasing the uptake of low emission buses are implemented as soon as possible to start the process of achieving compliance with the air quality objectives.

The bid application looks at acquiring a total of 36 electric buses that would be introduced to the Cardiff Bus fleet over a projected 3year cycle. The introduction of the electric buses would form part of a cascade programme whereby Euro 3 standard buses would be offset from the fleet completely, therefore improving the overall fleet composition.

It is envisaged that the roll out of the electric vehicles will begin in the **quarter 1/2 2021**.

#### Cardiff Clean Bus Retrofit Programme

Owing to the previously offered Department for Transport's (DfT) Clean Bus Technology Fund.

(CBTF), Cardiff Council's Clean Air Project Team proposes to function as a regulatory entity to manage, regulate and fund such a retro fit scheme with Cardiff based bus operators.

The retro fit programme would see applicable bus vehicles fitted with the necessary upgrades to produce an emissions output equivalent to a Euro VI vehicle.

The proposed bus retrofit scheme has been approved by the EU Commission for a value of 80% aid intensity, requiring successful operators to cover the remaining 20% cost. The total amount of applicable funding is set at £1.8 million.

As per the agreement from the EU Commission;

**The application process for the proposed scheme will be open until 31 December 2020. Financial support will end on 31 March 2021.**

The application procedure, at a minimum will be reviewed with the use of a two staged approach. In the event that the sum of successful applications at stage 2 equates to more than the funding available those applicants will proceed to stage 3.

Applicants will be aware of this approach and therefore will be asked to submit their evidence for stage 3 at the time of their initial submission. In answer to the stage 3 questioning applicants will need to provide additional/ a more detailed understanding for the impacts expectant of their proposed programme of works, in this instance air quality impacts expected.

**The weighted average score will only need to be considered if stage 3 assessment is needed.**

As outlined in the scheme's application conditional criteria; applicants are required to appoint the use of accredited technology which is compliant with the [Clean Vehicle Retrofit Accreditation Scheme \(CVRAS\)](#)

The buses to be retrofitted can be any pre-Euro VI (6) bus that is expected to be operational on the specified routes for at least five years or for 150,000 miles after the retrofit. Buses are not authorised to be moved to other localities outside the boundary of Cardiff.

Successful applicants will need to submit interim progress reports after project inception, currently set at 3 months, with a draft final report issued prior to 31st December 2021 reflecting on the impact of the activities initiated by the grant funding.

The Grant is to reimburse Capital Costs incurred and may be spent on the Accredited Technology and cost of fitting it to the buses, and the cost of and fitting of monitoring equipment. Although this is specified as a reimbursement of Capital Costs, it has been agreed that once the relevant invoices are received by the applicant from their appointed supplier for the necessary retrofit works, following the submission of a grant claim form, Cardiff Council would provide the funding to cover 80% of the invoiced cost.

The Grant **may not** be spent on:

- Staff costs for managing the project;
- Contributions in kind;
- Payments for activities of a political or exclusively religious nature;
- Depreciation, amortisation or impairment of fixed assets owned by the authority;
- Input VAT reclaimable by the authority from HM Revenue & Customs;
- Interest payments or service charge payments for finance leases;
- Gifts, other than promotional items with a value of no more than £10 in a year to any one person;
- Entertaining (which means anything that would be a taxable benefit to the person being entertained, according to current UK tax regulations); and
- Statutory fines, criminal fines or penalties.

The above scheme went live on the 1<sup>st</sup> October 2020 and can be viewed using the following link; <https://www.cardiff.gov.uk/ENG/resident/Parking-roads-and-travel/clean-air-cardiff/bus-retrofit-scheme/Pages/default.aspx>

## City Centre Transport Networks Improvements

CC is currently developing and undertaken detailed appraisals for a number of transport network improvements within the City Centre.

### City Centre West (CCW)

The main aim of this scheme is to accommodate the new Transport Interchange and Central Square Development, whilst also Improving Air Quality within the City Centre AQMA. This will be achieved through removing through-traffic from Westgate Street and installing a new highway layout that will improve and connect the current bus network with the new Interchange, Central Square, Central Station and the City Centre Enterprise Zone. In addition, the scheme will offer improved safety for pedestrians via improved pedestrian crossing facilities, 20mph speed limits and an improvement to the pedestrian environment outside of the national stadium. The scheme will also install a network of stepped cycle tracks to connect the area with the proposed cycleways on Castle Street and the Taff Trail routes.

### City Centre North (CCN)

The main aim of this scheme is to bring Castle Street into Air Quality compliance by 2021.

The Council is considering re-opening Castle Street to buses, taxis and emergency vehicles as a temporary measure while a public consultation is held on the future of the thoroughfare.

The proposed re-opening - which may be ready by mid-November 2020- will help buses and taxis cross east to west and west to east.

This temporary design will seek to ensure that the pop-up cycleway - which will run from Leckwith Road up Newport Road to the junction with Broadway - will be retained throughout the public consultation.

The temporary measure under consideration may include a pavement alongside the shops and bars opposite the castle extended into the road to give a wider walkway for people to socially distance. It could also create an opportunity for hospitality businesses to have more space outside their premises to trade.

Under the proposal, Castle Street could then contain two lanes for buses and taxis to travel east and or west, and the pop-up cycle lane by the castle would remain.

It is anticipated that the proposed scheme could bed-in before the Christmas season begins.

### Eastside Phase 1

The main aim of this scheme is to provide a new dynamic for the bus network, whilst connecting cycleway and improving the pedestrian environment outside of Queen Street Station. This will be achieved through providing bus priority measure throughout the Station Terrace and Churchill Way areas that will provide new routes for buses, taking them away from the City Centre AQMA and closer to key areas such as Queen Street Station and the shopping district. The new bus routing system is also key to allowing the Interchange to be accessed from its south entrance, and work effectively on major event days. A cycleway will be installed to connect the east of the city centre with the City Centre Enterprise Zone and join up all the proposed cycleway routes. Pedestrian

improvements on Dumfries Place and Station Terrace will also improve safety for pedestrians and improve connections to Queen Street Station and the City Centre Enterprise Zone.

### **Park & Ride**

Developing new bus park and ride facilities at M4 Junction 33 and other appropriate locations in Cardiff and neighbouring areas to reduce the number of cars driving into the city.

### **Development of Central Interchange**

In 2018 CC planning department received receipt of a full planning application which contains the proposed design and plans for a new central interchange station. Construction works are progressing with an envisaged completion date set for quarter 4 2022.

### **South East Wales Metro**

The Cardiff Capital Region Metro proposed by Welsh Government is likely to comprise a combination of rail-based and bus-based rapid transit routes linked through interchanges and using the same network brand and integrated ticketing system. A commitment has been made by Transport for Wales and the detail surrounding these commitments can be found at;

<http://tfw.gov.wales/whats-happening-south-east-wales>

## Active Travel

### School Monitoring and Active Travel Plans

#### Client Earth School Monitoring in Cardiff

Shared Regulatory Services (SRS) / Cardiff Council (CC) does operate a school monitoring programme. In 2018, SRS & CC began a monitoring campaign at 9 specific schools in Cardiff. Cardiff Councillors motioned a review of the current air quality monitoring network established across Cardiff and it was highlighted as a requirement to monitor local air quality in and around school buildings. It was decided that those schools to be monitored will be those highlighted in Client Earth's 2017 report which discussed potential detrimental air quality impacts at schools in relatively close proximity to major road networks. The report detailed 9 schools within 150m of roads with potentially harmful concentrations of nitrogen dioxide (NO<sub>2</sub>);

- Ysgol Mynydd Bychan, Gabalfa
- St Joseph's RC Primary, Gabalfa
- Stacey Primary, Roath
- Tredegarville CIW Primary, Adamsdown
- Cardiff Academy, Roath
- Mount Stuart Primary, Butetown
- St Peter's RC Primary, Roath
- Cathays High School, Cathays
- St Teilo's CIW High School, Llanedeyrn

To note; the Client Earth report distinguished the above listed schools as a potential concern supported by the use of modelled data and not 'actual' monitored data. Therefore, the commitment given to examine levels at the names school receptors with the use of monitored data can be cross referenced to verify the assumptions provided by the Client Earth 2017 report.

As of the w/c 29<sup>th</sup> January 2018, SRS on behalf of CC commissioned two air quality monitoring locations at each of the school premises. The monitoring sites monitor levels of nitrogen dioxide (NO<sub>2</sub>) using passive diffusion tubes which are collected and replaced on a rolling monthly basis. The results derived from the diffusion tube sampling are then averaged over the year to enable a comparison of the results against the annual average (40µg/m<sup>3</sup>) and 1-hour (200µg/m<sup>3</sup> not to be exceeded > 18 times per year) air quality objectives set for NO<sub>2</sub>. Annual datasets (2018 & 2019) gathered at each of the school monitoring sites **recorded annual average levels in compliance with the set air quality standards for NO<sub>2</sub>.**

#### NRW Citizen Science Project

In addition to the outlined established non-automated monitoring network, as discussed in the 2019 Annual Air Quality Progress Report (APR); funded externally by Natural Resources Wales (NRW) as part of the Citizen Science project, commissioned by NRW and commencing in April 2019, air quality

monitoring services was provided by Shared Regulatory Services (SRS) on behalf of Cardiff Council for a number of schools premises located in Cardiff;

- Rhiwbeina Primary School;
- Thornhill Primary School;
- St Monica's CIW Primary School;
- Millbank Primary School;
- Lansdowne Primary School; and
- St Mary The Virgin Church in Wales Primary School

These particular schools were chosen based upon local knowledge of the area, previous history, as well as focusing upon annual average daily traffic (AADT) flows of nearby road networks. Where road links are susceptible to traffic volumes greater than 10,000 AADT or 5,000 AADT (narrow streets) it is best practise to consider these areas for potential air quality concerns.

The air quality monitoring specifically targeted levels of nitrogen dioxide (NO<sub>2</sub>), known as a transport derived pollutant, utilising the recognised non-automated monitoring method to support the collection of datasets. The objective of the monitoring project was to examine and record levels of nitrogen dioxide (NO<sub>2</sub>), a known traffic derived pollutant. The project was funded for one year, whereby the datasets collected were intended to be used a driver to work with the monitored schools to influence behavioural change and raise awareness for air quality concerns.

Unfortunately, NRW have confirmed that there is no available budget to financially support the project any further, however Cardiff Council has given financial commitment to continue for one further year.

**To note; due to the unprecedented circumstances, current monitoring at school locations referenced above (Client Earth and Citizen Science project endorsed schools) has temporarily stopped as internal risk assessments deemed the sampling at these locations non-essential with the view that the risk of accessing the locations outweighs the benefits of the sampling. Monitoring at these locations will recommence when it is deemed viable to revisit the monitoring.**

### **Additional works for school monitoring in Cardiff**

Cardiff Council has a corporate commitment for every school in Cardiff to have an active travel plan by April 2022. Works are ongoing to understand how the Council can best support schools to develop and implement an active travel plan. The aim of an active travel plan is to increase the number of children, parents and staff travelling to school sustainably, in particular increasing walking, cycling and scooting. There are a range of resources, training and programmes available to schools and the ongoing works will identify what actions the schools need to take and access the relevant initiatives and programmes to implement these actions.

### **TRO Project**

In view of the corporate commitment to deliver active travel plans for all schools by April 2022, for 2019 SRS was commissioned by Cardiff Council's Transportation, Policy and Strategy Team to assist with Cardiff Council's Schools Streets Project and its Traffic Regulation Order (TRO) pilot project. The pilot project involves the temporary closure of road links surrounding specific schools in Cardiff, 6 in total.

- Whitchurch High Lower;
- Ysgol Melin Gruffydd;
- Peter Lea Primary;
- Llandaff Church in Wales Primary;
- Pencaeru; and
- Lansdowne Primary

The TRO is in effect during the schools' morning and afternoon drop-off and pick-up hours. This project is seen as an excellent opportunity to take action to encourage parents, staff and children to adopt an alternative mode of travel.

Shared Regulatory Services (SRS) have supported this pilot project by providing additional air quality monitoring since October 2019. SRS gather monthly datasets for nitrogen dioxide (NO<sub>2</sub>) using non-automated passive diffusion tubes, undertaken at the schools' premises, inside the TRO zone at a residential façade and outside the TRO zone at a residential façade. This strategic placement of monitoring sites allows the examination of potential displacement impacts as a result of the adopted TRO zone. The datasets gathered to date indicate compliance with the air quality standards for NO<sub>2</sub>.

### **Safe Routes to School**

Planning and prioritisation of improvements to Cardiff's walking and cycling network will be undertaken through the Integrated Network Map (INM) as part of our duties as set out under the Active Travel (Wales) Act 2013. The INM was approved by Council's Cabinet in September 2017 and Welsh Ministers in November 2017. The INM can be viewed on the Council website here:[www.cardiff.gov.uk/activetravel](http://www.cardiff.gov.uk/activetravel)

In addition, Cardiff Council bids for Welsh Government Safe Routes in the Community Grant on an annual basis. This Grant is used to make changes to the highway environment, such as new zebra crossing facilities etc., and is focussed on creating safer walking and cycling routes to schools.

A new Walking Bus Strategy is currently being developed to provide schools with a further opportunity to promote walking to schools.

### **DRAFT Cycling Strategy (2016- 2026) & Integrated Network Map**

The Cardiff Cycling Strategy sets out an ambitious vision to double the number of cycling trips by 2026, from a 9.2% modal share in 2015 to 18.4% in 2026.

The Cycling Strategy and INM proposes 5 cycleways which will provide high quality cycle routes, segregated from pedestrians and motor vehicles on busy roads, and will connect strategic development sites, existing residential areas, employment sites, the city centre and Cardiff Bay. These will be supported by a network of secondary routes.

The Integrated Network Map sets out Cardiff Council's 15-year vision to improve cycling and walking routes across the city, in order to meet the requirements of the Active Travel (Wales) Act 2013 to plan for the provision of routes and improvements for active travel.

<https://www.cardiff.gov.uk/ENG/resident/Parking-roads-and-travel/Walking-and-cycling/ActiveTravel/Pages/default.aspx>

## Cycleways

Cardiff Council are developing proposals for five Cycleways to support and promote cycling for all ages and abilities. The proposed routes will connect communities to major destinations across the city, including the City Centre and Cardiff Bay.

Cycleways will provide continuous routes that are intuitive and comfortable to use and separated from motor vehicles and pedestrians where needed.

The Cycleways will be developed from proposals in the Integrated Network Map which sets out a 15 year plan to improve routes for walking and cycling in the city.

The proposed Cycleway routes are:

- Cycleway 1: City Centre to Cathays, University Hospital Wales, Heath High Level and Heath Low Level Rail Stations, and North East Cardiff Strategic Development Site **(works are complete for phase 1 of cycleway 1. Second phase is currently out for consultation);**
- Cycleway 2: City Centre to Adamsdown, Newport Road retail parks, Rumney, Llanrumney and St Mellons Business Park;
- Cycleway 3: City Centre to Cardiff Bay;
- Cycleway 4: City Centre to Llandaff, Danescourt and North West Strategic Development Site; and
- Cycleway 5: City Centre to Riverside, Ely and Caerau.

## COVID Response Cycleways

Two routes - the 'Cross City' and 'Bay Loop' cycleways - are being brought forward as part of the Council's ongoing COVID Recovery plans and are in line with the cycling vision set out in the Council's Transport White Paper.

## Nextbike

The Nextbike hire scheme launched in Cardiff in 2018. The scheme is financially funded by Welsh Government and its main objectives are to reduce congestion, free up parking spaces and provide a healthier way to travel around the city. The scheme comprises of 50 docking stations located around Cardiff which facilitate 500 bicycles. To date the scheme has been positively received by members of the public.

Since the introduction of the Nextbike scheme in March 2018, the Cardiff scheme has become the UK's most successful<sup>1</sup>. By the end of summer 2019 the number of bikes available to hire further increased to 1,000.

## Car-free Day

On Sunday 12<sup>th</sup> May 2019, CC organised a car-free day event in the city's central area. The event coordinated with the HSBC UK Let's Ride event and on street entertainment.

The summary of air quality monitoring from Car-free Day;

---

<sup>1</sup> [NextBike In Depth Review 2018](#)

SRS on behalf of CC undertook a study to examine levels of air quality within Cardiff's City Centre in order to quantify the impact that the car-free day event on Sunday 12<sup>th</sup> May 2019 would have on the main traffic derived pollutant of concern nitrogen dioxide (NO<sub>2</sub>). It was anticipated that levels of NO<sub>2</sub> would reduce due to the restriction of vehicles and thus the study was undertaken in order to demonstrate and quantify this likely reduction.

Air Monitors Ltd supplied SRS with four near real-time indicative air quality monitors (AQ Mesh Pods). AQ Mesh pods measure gases, in this case nitric oxide, nitrogen dioxide and ozone using electrochemical sensors powered by Lithium batteries. The data from the pod is pushed to a cloud server where it is corrected for temperature, pressure and relative humidity as well as cross gas interference. To verify the performance of the gas sensors the units ran alongside a reference station and local scaling factors were derived and used to characterise the sensors. This then enables direct comparison of the data between the pods and the reference station.

In order to give a detailed understanding for the impact to air quality, levels were recorded before and after car-free day to enable a comprehensive comparison between normal baseline conditions and car-free day. The monitors were cited at their specified locations on Friday 3<sup>rd</sup> May 2019 and decommissioned on Monday 20<sup>th</sup> May 2019.

The monitors were located at locations situated on specific network routes influenced by the day's event;

Westgate Street

Castle Street/ Duke Street

Stephenson Court, Newport Road

Lower Cathedral Road

When comparing Sunday 19<sup>th</sup> May to Car-Free Day event 12<sup>th</sup> May, the daily average reduction for NO<sub>2</sub> is as follows;

Duke Street/ Castle Street- 16.11%

Stephenson Court on Newport Road- 28.15%

Westgate Street- 13.62%

Lower Cathedral Road- +9.14%

The above sites were allocated to understand the possible displacement of traffic movements outside the remit of the Car-Free day area. It must be noted Stephenson Court, Newport Road is already declared as an Air Quality Management Area (AQMA), based upon elevated and exceeding levels of nitrogen dioxide (NO<sub>2</sub>).

Although levels do show an increase in NO<sub>2</sub> levels at the site on Lower Cathedral Road, levels are compliant with the appropriate air quality objectives.

## **20mph Zones**

CC introduced a 'signs only' 20 miles per hour (mph) limit in the Cathays/Plasnewydd area in March 2014, as part of a two-year pilot project. Following the pilot, a commitment was made to look at how 20mph limits might be more widely applied in Cardiff.

The Council proposed to expand its commitment to 20mph zones and include 3 schemes. The 3 schemes proposed were highlighted for the area of Grangetown and detailed the following;

- Avondale Road traffic calming construction;
- Penarth Road Zebra Crossing construction; and
- St Patricks School Safety Zone construction.

**All schemes are complete.**

### **Public Service Boards Staff Charter**

Working initially through Cardiff Public Services Board, a Healthy Travel Charter for Cardiff has been developed with major public sector employers and was launched in April 2019. Signatories to the Charter make 14 commitments on improving access to active and sustainable travel for staff and visitors to their main sites, and jointly commit to three targets namely:

- Reduce the proportion of commuting journeys made by car;
- Increase the proportion of staff cycling weekly; and
- Increase the proportion of vehicles used for business purposes which are plug-in hybrid or electric.

The Charter was signed by 11 public sector organisations at launch in April 2019, employing over 33,000 staff, with additional public and private sector organisations subsequently invited to sign up to the Charter.

Currently it is not possible to fully assess the impacts of the above the measures but it is envisaged that such measures will contribute to wider behavioural changes and incentives to encourage further modal shift or uptake of low emission vehicles which will see improvements in air quality.

## Clean Vehicles

### Sustainable Fuels Strategy

CC has developed a Sustainable Fuels Strategy to explore the potential to support a move within the city to increased use of sustainable fuels. An independent consultancy specialising in low carbon and fuel cell technologies, were commissioned to undertake a targeted fleet review of Cardiff City Council vehicles.

In the **short term** the following “quick wins” are recommended:

Undertake a managed replacement of Cardiff Council fleet, where cost effective. This would include replacing cars and small vans with EVs, which are expected to save the Council money on a total cost of ownership basis due to lower operating costs;

Install more publicly available EV charging points at appropriate locations throughout the city. The Council should identify as a priority, appropriate locations for charging points and begin to engage potential delivery and funding partners from OLEV and the private sector. The Council should also develop an understanding of business models around the potential direct sale of energy through these on-street charging points.

### EV Feasibility study

In 2018 Arcadis Consulting (UK) Ltd supported by Zero Carbon Futures (UK) Ltd were commissioned by Cardiff Council to prepare a feasibility study to explore how electrically powered Ultra Low Emission Vehicle (ULEV) charging points could be integrated across the city of Cardiff. As the market share of ULEV is growing and is forecasted to increase significantly over the coming decades, it is critical that the necessary charging infrastructure is provided to facilitate this growth, in order to support a cleaner transport system across Cardiff.

### EV Infrastructure

-Progression of residential EV charging locations has ensured that 10 locations with a total of 18 fast charging points have been installed across the City. Second phase of 5 sites with 1 charge points was being progressed before being impacted by COVID – these are now planned for late August/ early September.

-Pilot project for installation of 6 Rapid Charging stations has been initiated with Enginie. One location has been fully installed with the remaining 5 locations now in final planning stages, and licenses being progressed.

-Initial work by CTS was to ensure 90 Council vehicles were replaced by full EVs by 2021. Impacts from COVID has resulted in a delay to the progression. CTS are intending to review the wider fleet with Welsh Government Energy Service / ULEV. Following this review a revised timetable will be known or the delay period to the original plan. Potentially pushed back by 1 year.

### Taxi Licensing Condition Change

SRS & CC is proposing to improve the emission standards of the City’s licensed vehicles. Subject to consultation response and Public Protection Committee (PPC) approval, Cardiff Council wishes to implement a taxi licensing policy change to improve emission standards for licensed taxi vehicles in Cardiff. Due to current pandemic, it’s been decided not to pursue the licensing change with urgency. Discussions and detailed works are ongoing to assess potential funding options that can be made

available to drivers to assist with delivering any licensing amendment and support to transition the fleet to ULEVs.

## Green Infrastructure

Cardiff Council's Energy & Sustainability Team, on behalf of Tredegarville CIW Primary School, has successfully applied for a grant under the Landfill Communities Fund to cover the supply and installation of outdoor green walls (these products are sometimes referred to differently e.g. 'living walls' or 'green screens') at Tredegarville CIW Primary School.

Tredegarville CIW Primary School is located in a very urban high rise setting in Cardiff City Centre in relative close proximity to the Stephenson Court AQMA. As a result, the school provides its pupils with very little access to green space. However, the school is enthusiastic about improving this situation through developing the green environment at its site. As Tredegarville CIW Primary falls within the remit of the newly commissioned school monitoring sites for 2018, it will be interesting to see any marked improvements in average NO<sub>2</sub> dataset trends.



## Improved monitoring

### Automatic monitoring

At the time of writing this report, Cardiff Council with the financial support of Welsh Government has commissioned a fourth automated monitoring site, located on Castle Street. The roadside site monitors on a 24/7 basis measuring levels of NO<sub>2</sub>, PM<sub>10</sub> & PM<sub>2.5</sub> at that location and forms part of the Welsh Automated Monitoring Network. Reporting for this site will be included in future reports.

In addition to the newly commissioned automated monitoring station on Castle Street, Cardiff Council has acquired the use of 6 near real time indicative air quality analysers. 5 analysers were purchased with the financial support of Welsh Government and the 6<sup>th</sup> analyser was facilitated by the SRS who had successfully accrued funding via a S106 planning contribution. The analysers have been specifically placed and represent relevant exposure. The analysers continuously monitor for Nitric Oxide, Nitrogen Dioxide & Ozone, PM10 & PM2.5, and do so every 15 minutes (data uploaded every hour). Information regarding the specification of the monitors can be viewed at <https://www.aqmesh.com/product/>. These monitors do not form part of the regulated Welsh automated monitoring network, but as specified they are an indicative form of monitoring and a useful tool to look at datasets on a high-resolution basis. An online platform to access the available datasets is yet to be finalised with Cardiff Council's webpage development team.

## Publications & Policies

### Cardiff's Transport White Paper

The Transport White Paper was launched on 15 January 2020 and lays out an ambitious 10-year plan to tackle the climate emergency, reduce congestion and improve air quality. It includes proposals for developing the South East Wales Metro, including new Metro lines connecting new and existing communities in the city, Rapid Bus Transport, Active Travel and improvements to our streets and the future of the car, including reducing car ownership through car clubs and greening through the expansion of EV charging infrastructure. Key regional projects are identified, with significant improvements proposed for all the major routes into the city. It also outlines the intention to consider all delivery options and to work with Welsh Government to develop a comprehensive investment plan. The timescale for the White Paper was amended in line with ongoing developments in relation to the Clean Air Plan to ensure alignment.

Document is available at;

<https://www.cardiff.gov.uk/ENG/resident/Parking-roads-and-travel/transport-policies-plans/transport-white-paper/Documents/White%20Paper%20for%20Cardiff%20Transport%202019.pdf>

### Planning for Health and Well-being SPG (November 2017)

This Supplementary Planning Guidance (SPG) supplements policies in the adopted Cardiff Local Development Plan (LDP) relating to health and planning and has been developed jointly between the Council and the Cardiff and Vale University Health Board. This interaction underlines the fact that neither health nor planning considerations are made in isolation.

The purpose of this SPG is:

- To provide supporting information and guidance for planners, developers and investors on how our environment and the planning decisions we make, impact on the health and wellbeing of the population.
- To help achieve the Council's vision of addressing health inequalities and become a leading city on the world stage as set out in the Capital Ambition Document
- To ensure planning decisions contribute to the national and local Well-being Goals set out in the Well-being of Future Generations (Wales) Act 2015.
- To offer guidance for addressing the effect of the built and natural environment on health and well-being as part of a strategic approach to tackling the city's health inequalities and promoting healthy lifestyle options.
- To provide guidance on appropriate locations for health care facilities.
- To be an important material consideration in the determination of planning applications by setting out a range of potential health and well-being related factors that developers should consider when drawing up development proposals.

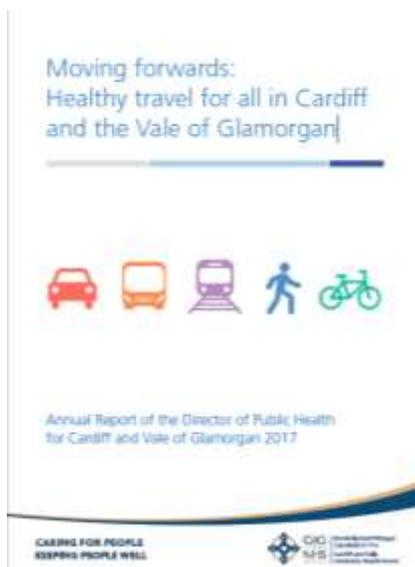
### Green Infrastructure (GI) Supplementary Planning Guidance (SPG) (November 2017)

This document provides planning advice on a number of areas relating to development and the environment, including protection and provision of open space, ecology and biodiversity, trees, soils, public rights of way, and river corridors.

The green infrastructure approach combines all these elements to achieve a more joined-up approach to the environment. This approach is increasingly being used in Cardiff and across the UK. In Cardiff, planning advice in this area is often provided by a number of officers from across the Council working together as part of an integrated Green Infrastructure Group. This helps provide a more comprehensive approach.

The new document also differs from previous SPGs by providing in depth design advice, aimed at giving developers a clearer understanding of the approach expected when submitting designs for new developments. By having this information up-front developers are better able to provide suitable designs to the Council through the planning process.

### Cardiff and Vale University Health Board Report



The report issued in 2017 examines how making active travel alternatives can lead to sustainable improvements in our health and well-being. The report focuses upon Cardiff's air quality concerns and recognises that alternative sustainable transport is a key enabler to improving air quality.

**Planning Guidance for the Provision of Electric Vehicle Charging Points**

In November 2018, the Council published a guidance document for developers on the provision of charging points in new developments. This document sets out the Council’s expectations on the minimum number of electric charging points that should be provided depending on the nature of the development. The expectations are summarised as follows:

Development Type	Provision
<b>Houses</b>	<b>One electric vehicle dedicated charging point</b> (up to 7kW (32A) where possible) <b>or installation of passive wiring</b> to allow future charging point connection per house with garage or driveway.
<b>Flats</b>	<b>At least 10% of parking bays</b> should be provide with dedicated electric vehicle weatherproof charging points.
<b>Commercial Car Parks and Community Facilities</b>	<b>At least 10% of parking bays</b> should be provided with dedicated electric vehicle weatherproof charging points.
<b>Public Transport Facilities and Taxi Ranks</b>	Charging infrastructure will be required to facilitate the conversion of bus and taxi fleet, using <b>appropriate technological solutions at suitable locations across the city.</b>
<b>Future Proofing</b>	Subject to agreement with the Local Planning Authority standard provision may also require <b>installation of groundwork/passive wiring at the outset</b> to enable further future installation to match demand.

**One Planet Cardiff Strategy**

An ambitious new plan designed to drive Cardiff towards becoming a carbon neutral city by 2030 has been unveiled by Cardiff Council.

‘One Planet Cardiff’ sets out the Council’s response to the climate change emergency and calls upon businesses and residents to join forces with the council to make the lifestyle changes required, if Wales’ capital is to become a truly ‘Green’ and sustainable city over the next ten years.

Full document available using the following link;

<https://www.oneplanetcardiff.co.uk/wp-content/uploads/OPC%20vision%20document%202020%20ENGLISH.pdf> Planning for Health and Well-being SPG (November 2017)

## Local Priorities and Challenges

### Challenges

Due to the unprecedented circumstances, this has had an impact on the local air quality monitoring and the delivery of the package of measures sanctioned by Cardiff's Clean Air Plan.

Due to constant dialogue and ongoing collaboration with Welsh Government officials, the Plan remains on course to deliver compliance in the shortest possible time. During the COVID-19 pandemic local air quality monitoring has continued in Cardiff, however some non-automated results for a few selected months in 2020 will not be available for next year's reporting due to 'lockdown' measures introduced in the month of March 2020. Local Authorities including SRS at the time of the 'lockdown' measures being imposed looked for official clarity to ascertain if the monitoring was classified as essential in view of quietened road networks which may lead to a favourable bias, as well as difficulties faced by analytical laboratories utilised by SRS which had to adapt their working practises which added to postage delays.

Air quality data collection has been deemed as an essential service by Welsh Government, whereby monitoring was resumed for May 2020. The results for 2020, which will be recorded in the 2021 Annual Progress Report will need to be corrected/ ratified to account for the gaps in the annual datasets incurred by the COVID situation. The exclusion of this data will be further discussed, however at this moment in time, results gathered during the COVID pandemic, where it is apparent that road traffic volumes have decreased significantly are perhaps not representative of a true business as usual scenario which could generate a bias/ underestimate of levels.

Some indicative analysis has been undertaken to ascertain what impact the current pandemic has had on air quality levels, especially within the established AQMAs. Comparative exercises have been undertaken to observe a change in levels between certain time periods, for example the same year comparison distinguishing between pre-covid and covid timeframes, and comparison to previous years' results which examines a pre covid time period with that of a covid impacted time period. To note it is not viewed as a preferable indicator to directly compare to previous years' data given influencing meteorological conditions, however the exercise is useful to populate indicative trends/ visualise impacts.

**Figure 6 - Same year Covid comparison (2020)**

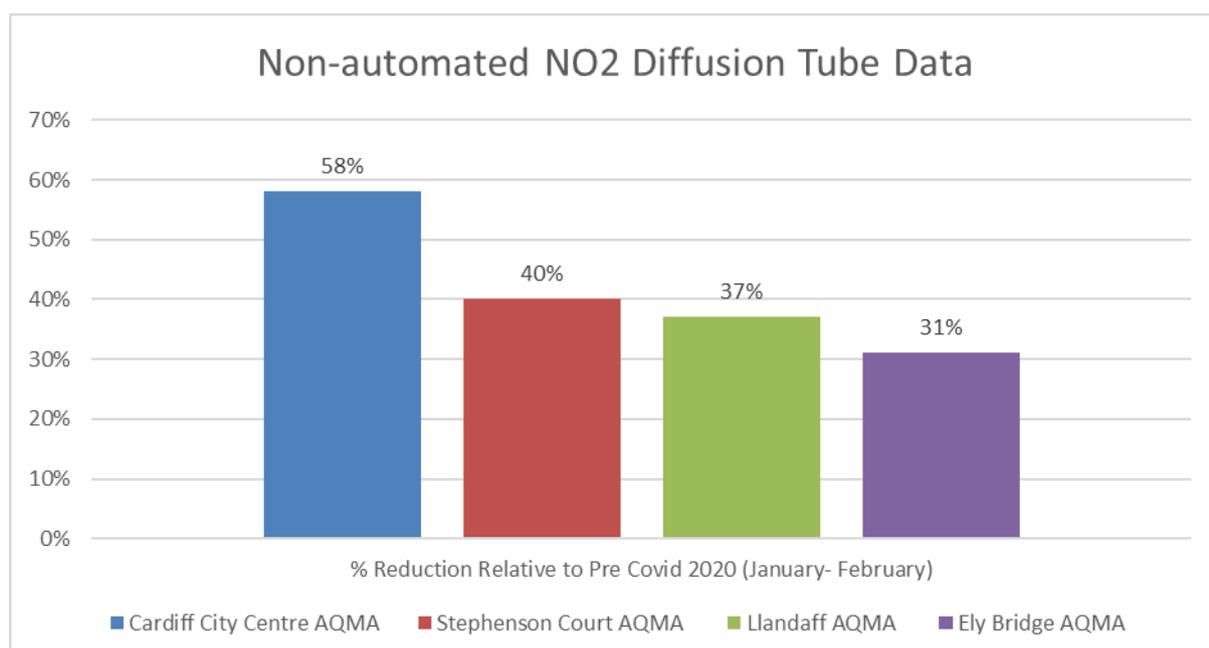
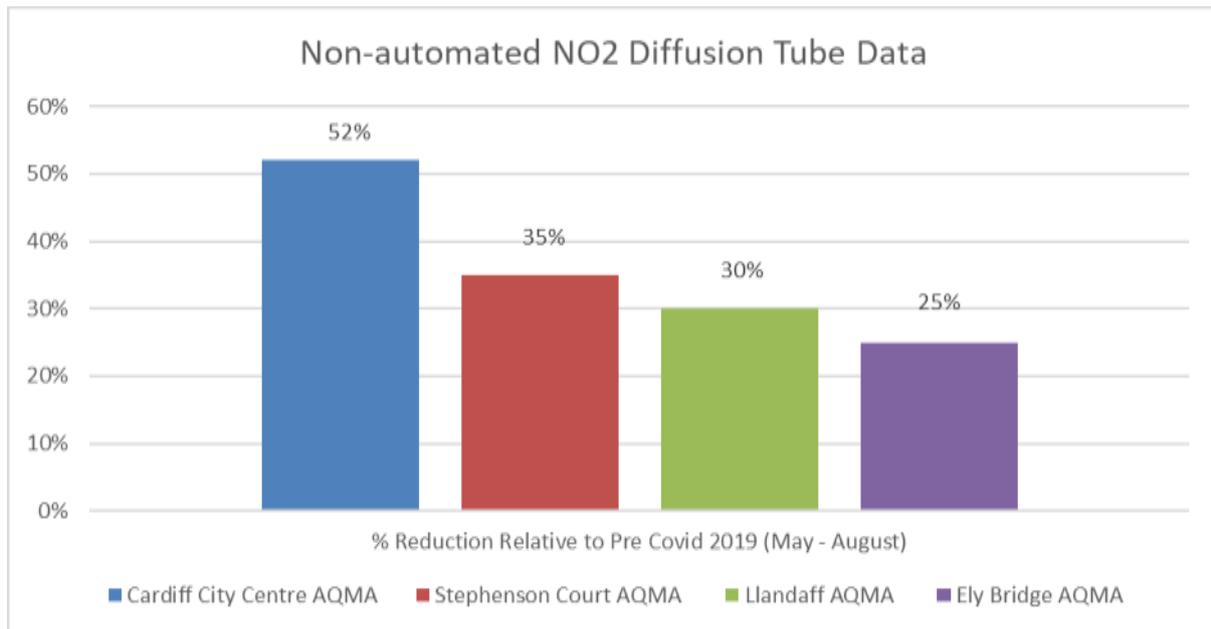


Figure 7- Previous year comparison (2019)



The main priorities for SRS and Cardiff Council in the coming year are;

-Deliver the full- business case for the Clean Air Feasibility study that satisfies the requirements of Welsh Government and the previously described ministerial Direction.

## How to Get Involved

CC welcomes any correspondence relating to air quality enquiries or concerns. Shared Regulatory Services (SRS) Specialist Services Team represents CC for local air quality management and therefore is contactable using the following email address [AirQuality-SRSWales@valeofglamorgan.gov.uk](mailto:AirQuality-SRSWales@valeofglamorgan.gov.uk)

For any enquiries surrounding Cardiff's Clean Air Plan, specifically the roll out of mitigation measures please contact Cardiff's Clean Air Team on [cleanairproject@cardiff.gov.uk](mailto:cleanairproject@cardiff.gov.uk).

Hourly and Monthly average monitoring data for pollutants measured is available at <https://airquality.gov.wales/>

## Table of Contents

Executive Summary: Air Quality in Our Area.....	iii
Public Health .....	iii
Air Quality in the City of Cardiff Council .....	iv
Actions to Improve Air Quality.....	xiii
Public Transport .....	xiv
Active Travel.....	xviii
Clean Vehicles .....	xxiv
Green Infrastructure .....	xxvi
Improved monitoring .....	xxvii
Publications & Policies .....	xxviii
Local Priorities and Challenges.....	xxxii
How to Get Involved .....	xxxii
1.    Actions to Improve Air Quality.....	1
1.1    Previous Work in Relation to Air Quality .....	1
1.2    Air Quality Management Areas.....	5
1.3    Implementation of Action Plans.....	5
2.    Air Quality Monitoring Data and Comparison with Air Quality Objectives .....	22
2.1    Summary of Monitoring Undertaken in 2019 .....	22
2.1.1    Automatic Monitoring Sites .....	22
2.1.2    Non-Automatic Monitoring Sites .....	26
2.2    2019 Air Quality Monitoring Results.....	53
2.3    Comparison of 2019 Monitoring Results with Previous Years and the Air Quality Objectives.....	70
2.3.1    Nitrogen Dioxide (NO <sub>2</sub> ) .....	70
2.3.2    Particulate Matter (PM <sub>10</sub> ) .....	74
2.3.3    Sulphur Dioxide (SO <sub>2</sub> ).....	74
2.3.4    Benzene.....	74
2.3.5    Other Pollutants Measured .....	75
Carbon Monoxide.....	75
Ozone .....	75
2.4    Summary of Compliance with AQS Objectives as of 2019 .....	76
3.    New Local Developments.....	77
3.1    Road Traffic Sources (& other transport).....	77

3.1.1	Narrow Congested Streets with Residential Properties Close to the Kerb.....	77
3.1.2	Busy Streets Where People May Spend 1-hour or More Close to Traffic .....	77
3.1.3	Roads with a High Flow of Buses and/or HGVs.....	77
3.1.4	Junctions .....	77
3.1.5	New Roads Constructed or Proposed Since the Last Round of Review and Assessment .....	78
3.1.6	Roads with Significantly Changed Traffic Flows.....	78
3.1.7	Bus and Coach Stations.....	78
3.1.8	Airports .....	79
3.1.9	Railways (Diesel and Steam Trains) .....	79
	Stationary Trains .....	79
	Moving Trains.....	79
3.1.10	Ports (Shipping).....	80
3.2	Industrial / Fugitive or Uncontrolled Sources / Commercial Sources.....	81
3.2.1	New or Proposed Installations for which an Air Quality Assessment has been Carried Out.....	81
3.2.2	Existing Installations where Emissions have Increased Substantially or New Relevant Exposure has been introduced .....	82
3.2.3	New or Significantly Changed Installations with No Previous Air Quality Assessment .....	82
3.2.4	Major Fuel (Petrol) Storage Depots.....	82
3.2.5	Petrol Stations.....	83
3.2.6	Poultry Farms .....	83
3.3	Commercial and Domestic Sources.....	83
3.3.1	Biomass Combustion – Individual Installations .....	83
3.3.2	Biomass Combustion – Combined Impacts.....	83
3.3.3	Other Sources .....	83
3.3.4	Domestic Solid-Fuel Burning.....	83
3.4	New Developments with Fugitive or Uncontrolled Sources .....	84
3.5	Planning Applications.....	84
3.5.1	LDP Strategic Sites North West .....	84
3.5.2	Asphalt Batching Plant, Rover Way (19/01918/MJR).....	87
3.5.3	Westgate Street Hotel 19/01538/MJR .....	87
4.	Polices and Strategies Affecting Airborne Pollution .....	89
4.1	Local / Regional Air Quality Strategy.....	89

4.2	Air Quality Planning Policies.....	89
4.3	Local Transport Plans and Strategies .....	92
4.4	Active Travel Plans and Strategies .....	94
4.4	Local Authorities Well-being Objectives .....	95
	Cardiff Well-Being Plan 2018-2023 .....	96
4.5	Green Infrastructure Plans and Strategies.....	96
4.6	Climate Change Strategies .....	97
5.	Conclusions and Proposed Actions .....	99
5.1	Conclusions from New Monitoring Data.....	99
5.2	Conclusions relating to New Local Developments/ Sources.....	99
5.3	Other Conclusions .....	99
5.4	Proposed Actions .....	99
	References.....	100
	Appendices .....	101
	Appendix A: Monthly Diffusion Tube Monitoring Results .....	102
	Appendix B: A Summary of Local Air Quality Management.....	104
	Purpose of an Annual Progress Report .....	104
	Air Quality Objectives.....	104
	Appendix C: Air Quality Monitoring Data QA/QC .....	106
	Diffusion Tube Bias Adjustment Factors .....	106
	Short-Term to Long-Term Data Adjustment.....	107
	QA/QC of Diffusion Tube Monitoring .....	108
	Glossary of Terms.....	109

**Figures**

Figure 1-	Boundary of Cardiff City Centre AQMA.....	vii
Figure 2-	Boundary of Ely Bridge AQMA .....	viii
Figure 3-	Boundary of Stephenson Court AQMA .....	ix
Figure 4-	Boundary of Llandaff AQMA .....	x
Figure 5-	The Well- being of Future Generations (Wales) Act 2015 Matrix.....	xi
Figure 6 -	Same year Covid comparison (2020).....	xxxi
Figure 7-	Previous year comparison (2019) .....	xxxii
Figure 8-	Location of Cardiff City Centre AURN Monitoring Site (AURN 1).....	22
Figure 9-	Location of Cardiff Newport Road AURN Monitoring Site (AURN 2) .....	23
Figure 10-	Map Showing Location of Diffusion Tubes in and around the Cardiff City Centre AQMA....	28
Figure 11-	Map Showing Location of Diffusion Tubes in and around the Ely Bridge AQMA .....	29
Figure 12-	Map Showing Location of Diffusion Tubes in and around the Stephenson Court AQMA ....	30
Figure 13-	Map Showing Location of Diffusion Tubes in and around the Llandaff AQMA .....	31
Figure 14-	Map Showing Location of Diffusion Tubes on Cowbridge Road West.....	32
Figure 15-	Map Showing Location of Diffusion Tubes in Cathays & Adamsdown area .....	33

Figure 16- Map Showing Location of Diffusion Tubes in and around Newport Road.....	34
Figure 17- Map Showing Location of Diffusion Tubes in Llandaff area.....	35
Figure 18- Map Showing Location of Diffusion Tubes in the Western Avenue area .....	36
Figure 19- Map Showing Location of Diffusion Tube in Fairwater.....	37
Figure 20- Map Showing Location of Diffusion Tubes in Cathays & Gabalfa area .....	38
Figure 21- Map Showing Location of Diffusion Tubes in Riverside area .....	39
Figure 22- Map Showing Location of Diffusion Tubes in Canton area .....	40
Figure 23- Map Showing Location of Diffusion Tubes in Penylan area.....	41
Figure 24- Map Showing Location of Diffusion Tubes in Heath area .....	42
Figure 25- Map Showing Location of Diffusion Tubes around Butetown .....	43
Figure 26- Map Showing Location of Diffusion Tube in East Tyndall Street, Splott.....	44
Figure 27- Map Showing Location of Diffusion Tubes on Penarth Road area .....	45
Figure 28- Map Showing Location of Diffusion Tube on Heol Isaf Road, Radyr.....	46
Figure 29- Map Showing Location of Diffusion Tubes on Caerphilly Road, Llanishen .....	47
Figure 30- Map Showing Location of Diffusion Tube on Cathedral Road, Pontcanna .....	48
Figure 31– Trends in Annual Mean NO <sub>2</sub> Concentrations Measured at Cardiff Frederick Street AURN (AURN 1) Site .....	64
Figure 32- Trends in Annual Mean PM <sub>10</sub> Concentrations Measured at Cardiff Frederick Street AURN (AURN 1) Site .....	67
Figure 33- Trends in Annual Average NO <sub>2</sub> Concentrations Recorded at Façade Locations in City Centre AQMA.....	71
Figure 34- Trends in Annual Average NO <sub>2</sub> Concentrations Recorded at Kerbside Locations in Cardiff City Centre AQMA.....	71
Figure 35- Trends in Annual Average NO <sub>2</sub> Concentrations Recorded at Façade Locations in in Ely Bridge AQMA .....	72
Figure 36- Trends in Annual Average NO <sub>2</sub> Concentrations Recorded at Façade Locations in Llandaff AQMA.....	73
Figure 37- Trends in Annual Average NO <sub>2</sub> Concentrations Recorded at Residential Façade Locations within the Stephenson Court AQMA. ....	74
Figure 38- Integrated Network Map .....	94
Figure 39- Map of Cardiff’s Cycleways Proposal .....	95
Figure 40: National Diffusion Tube Bias Adjustment Factor Spreadsheet .....	106

Tables

Table 1– Progress on Measures to Improve Air Quality.....	7
Table 2- Details of Automatic Monitoring Sites .....	25
Table 3- Details of Non-Automatic Monitoring Sites 2019 .....	49
Table 4– Non-automatic Annual Mean NO <sub>2</sub> Monitoring Results (2015- 2019) .....	53
Table 5– Automatic Annual Mean NO <sub>2</sub> Monitoring Results (2015- 2019) .....	62
Table 6– Automatic 1-hour Mean NO <sub>2</sub> Monitoring Results (2015- 2019).....	63
Table 7– Automatic Annual Mean PM <sub>10</sub> Monitoring Results (2015- 2019).....	65
Table 8– Automatic 24-Hour Mean PM <sub>10</sub> Monitoring Results (2015- 2019).....	66
Table 9– Automatic SO <sub>2</sub> Monitoring Results: Comparison with Objectives.....	68
Table 10– Automatic Carbon Monoxide (CO) Monitoring Results: Comparison with Objectives .....	68
Table 11– Automatic Ozone (O <sub>3</sub> ) Monitoring Results: Comparison with Objectives .....	69
Table 12– Full Monthly Diffusion Tube Results for 2019 .....	102
Table 14– Air Quality Objectives Included in Regulations for the Purpose of LAQM in Wales.....	105
Table 15- Long term AURN site used for calculation of NO <sub>2</sub> annualisation ratio for Cardiff City Centre AURN 1.....	107
Table 16- Long term AURN site used for calculation of PM <sub>10</sub> annualisation ratio for Cardiff City Centre AURN 1.....	107

Table 18– Long term AURN site used for calculation of nitrogen dioxide annualisation ratio for Diffusion Tube 134.....107

Table 19– Long term AURN site used for calculation of nitrogen dioxide annualisation ratio for Diffusion Tube 179.....107

Table 20– Long term AURN site used for calculation of nitrogen dioxide annualisation ratio for Diffusion Tube 187.....107

Table 21– Long term AURN site used for calculation of nitrogen dioxide annualisation ratio for Diffusion Tube 188.....108

Table 22– Long term AURN site used for calculation of nitrogen dioxide annualisation ratio for Diffusion Tube 220.....108

Table 23- Long term AURN site used for calculation of nitrogen dioxide annualisation ratio for Diffusion Tube 222.....108

Table 24- Long term AURN site used for calculation of nitrogen dioxide annualisation ratio for Diffusion Tube 224.....108

# 1. Actions to Improve Air Quality

## 1.1 Previous Work in Relation to Air Quality

### Phase 1

The Local Air Quality Management regime commenced with the Air Quality Regulations 1997, which came into force in December of that year. These Regulations were revoked and superseded by the current Air Quality (Wales) Regulations 2000 (as subsequently amended in 2002).

The first phase of the review and assessment process concluded that for six of the seven pollutants included in the regulations there was little or no risk of the objectives being breached and that Air Quality Management Areas (AQMAs) for these pollutants were not necessary. Measures taken at the national level would be sufficient to ensure that there would be no local “hot-spots” of these pollutants and therefore local controls in addition to the national measures would not be required.

However, for the seventh of these pollutants, nitrogen dioxide (NO<sub>2</sub>), it was concluded that national control measures such as vehicle emission and fuel standards, controls on industrial emissions, etc., would not, of themselves, be sufficient to ensure that the air quality objectives for this pollutant would not be met in all areas of Cardiff.

Whilst the vast majority of the area would meet the objectives, there were predicted to be local “hot-spots” close to heavily-trafficked road junctions where there were buildings close to the road and significant amounts of queuing traffic where the objectives would not be met.

As a result, four AQMAs were declared, each having been declared on the basis of measurements and modelling showing predicted breaches of the annual average objective for NO<sub>2</sub>. These AQMAs were known as;

- The Cardiff West AQMA
- The Newport Road AQMA
- The Philog AQMA
- The St Mary Street AQMA

The first three of these came into force on 1<sup>st</sup> December 2000 and the latter on 1<sup>st</sup> September 2002. AQAPs the first three were published in November 2002 and for St Mary Street in February 2010.

### Phase 2

The Council’s 2003 USA concluded that for five of the seven pollutants regulated under the LAQM regime there was no evidence to suggest that local “hot-spots” for these pollutants had been missed in the first phase of the review and assessment process and that there was no need to consider these pollutants further at this time.

The 2003 USA also concluded that no local hot-spots of nitrogen dioxide had been overlooked during the first phase of review and assessment and that further detailed assessment of this pollutant was not necessary.

However, whilst the USA concluded that there was no evidence to suggest a likely breach of the 2004 objective for particulate matter (PM<sub>10</sub>), there was considerable doubt that the provisional 2010 objectives for PM<sub>10</sub> would be achieved.

As a result of the conclusions of the 2003 USA the Council issued Progress Reports in 2004 and 2005.

### **Phase 3**

Following the 2006 USA, the Council published and consulted upon an Air Quality Management Area (AQMA) Review during the autumn of 2006. This concluded that two of the four AQMAs could be revoked and that the then Cardiff West AQMA should be reduced in size and renamed as the Ely Bridge AQMA. Orders making the changes came into force on 1<sup>st</sup> February 2007.

The 2007 Progress Report highlighted a potential problem with regard to nitrogen dioxide concentrations on Newport Road in the immediate vicinity of Stephenson Court, where concentrations had been marginally, but consistently, above the Air Quality objective for a few years. It was concluded that the possibility of declaring a new AQMA would be assessed in the 2008 Progress Report.

The monitoring data for the Stephenson Court area presented in the 2008 Progress Report led to the conclusion that a further “watching brief” would be kept with a view to reaching a firm conclusion once ratified monitoring data for the 2008 calendar year became available.

The monitoring data for 2007 presented in the 2008 Progress Report provided reassurance that the Council’s decisions in respect of the 2006 AQMA Review were soundly based.

### **Phase 4**

The 2009 USA concluded that a Detailed Assessment for the Stephenson Court area of Newport Road was required as the annual mean concentration of nitrogen dioxide at three sites representative of relevant exposure in the area were above the air quality Objective.

A Detailed Assessment for this area was consulted upon during the summer of 2010 and the AQMA came into force on 1<sup>st</sup> December 2010.

The Council’s 2010 Progress Report was submitted in December 2010 and the 2011 Progress Report in June 2011.

The 2011 Progress Report highlighted abnormally high NO<sub>2</sub> 2010 annual mean concentrations across the Council’s monitoring network which could not be attributed to a particular source and evidence was presented to show that this was a regional issue probably associated with a prolonged period of unusually cold weather during November and December 2010. After dialogue with Welsh Assembly Government with regard to the conclusions reached about this data it was concluded that the Council would proceed to Detailed Assessments for the Llandaff and Westgate Street areas of the city and review the situation with regard to other exceedences when 2011 data is available and reported in 2012.

A Further Assessment for the Stephenson Court AQMA was submitted to WAG for review in December 2011, i.e. one year after the AQMA was declared, in compliance with Section 84(2)(a) of the Environment Act 1995.

### **Phase 5**

The 2012 USA was the first report in Phase 5 of the review and assessment process.

Monitoring data for 2011 largely confirmed that the annual mean concentrations of nitrogen dioxide previously reported for 2010 were unusually elevated, both locally and regionally, and local concentrations had returned to more typical values in 2011.

Detailed Assessments in respect of nitrogen dioxide in Westgate Street and for the Llandaff area were consulted upon during the summer of 2012 and as a result a new AQMA for Llandaff was declared on 1<sup>st</sup> April 2013 and Westgate Street was incorporated into the St Mary Street AQMA; this latter AQMA is now named Cardiff City Centre AQMA.

The Council's 2013 Progress Report recommended proceeding to a Detailed Assessment for the Fair oak Road Roundabout in the Plasnewydd Ward of the city as monitoring data over previous years indicated the need. This was submitted for review during 2014. The Assessment concluded that, as monitoring data for 2013 had returned to Objective compliance, there was no need to declare an AQMA at that time. It was proposed to continue monitoring in the area and review the results year-on-year.

The Further Assessment for the City Centre AQMA was submitted in April 2014 and the conclusion that the declaration of the AQMA was justified was accepted.

A Further Assessment for the Llandaff AQMA was also submitted for review in 2014. This concluded that the declaration of the AQMA was justified based upon monitoring data available at the time. However, as monitoring data for 2013 showed compliance with the Objective, it was concluded that there was no need to develop an Action Plan at that time. Monitoring would continue and the situation would be reviewed year-on-year.

In summary, there are currently four AQMAs in Cardiff; all have been declared in respect of NO<sub>2</sub> resulting from road-traffic emissions:

- Cardiff City Centre AQMA
- Ely Bridge AQMA
- Stephenson Court AQMA
- Llandaff AQMA

## **Phase 6**

The 2015 USA was the first report in Phase 6 of the review and assessment process.

Monitoring data for 2014 largely confirmed that the annual mean concentrations of nitrogen dioxide previously reported for 2010 were unusually elevated, both locally and regionally, and local concentrations had returned to more typical values in 2011.

Monitoring data for 2015 indicated that annual mean concentrations of nitrogen dioxide were not unduly elevated during the year and that in some locations concentrations may have been lower than expected. The 2016 Progress Report showed a number of sites representative of relevant exposure with exceedences of the 40µgm<sup>3</sup> annual mean objective, however these sites and recorded exceedences were not out of character as were predominantly contained within the declared AQMAs.

## **2017 Annual Progress Report**

There are a number of sites representative of relevant exposure with exceedences of the NO<sub>2</sub> annual mean objective (40µgm<sup>3</sup>). These sites are predominantly contained within the declared AQMAs. However, there are four monitoring locations (Site IDs 172, 180, 181, 185) which are not located within AQMAs.

Site 172 (Ocean Way) is a kerbside location situated up to 650m from any relevant exposure, used to examine potential impacts of traffic resulting from industrial development in the area.

Sites 180 & 181 were implemented due to new developments with the potential for adverse air quality impacting the amenity of future occupants (Windsor House, Windsor Lane & Fitzalan Court, Newport Road). Both developments were under construction in 2016, therefore influencing any datasets recorded. Only recently has the student accommodation at Windsor House been completed and construction still continues at the Fitzalan Court site.

Site 185 is not representative of relevant exposure and does not apply to the annual mean objective set for NO<sub>2</sub>. Therefore, datasets collected at this monitoring location would apply to the 1-hour objective set for NO<sub>2</sub> (**200µg/m<sup>3</sup>, not to be exceeded more than 18 times per year**).

**Monitoring for other pollutants did not result in other exceedences of National Air Quality Standards.**

Due to technical issues, Cardiff City Centre's AURN site recorded low data capture for PM<sub>10</sub> measured by a TEOM- FDMS sampler. The total data capture for the year was 47.1%. As outlined in LAQM (TG16) the data from the sampler has been annualised in accordance with Box 7.9 and the 90.4<sup>th</sup> Percentile value has been given to examine the 24 hour objective.

It was decided not to revoke the Llandaff AQMA. Since the declaration of the Llandaff AQMA in 2013, results have highlighted that levels of NO<sub>2</sub> are generally improving and are now below the national objective of 40µg/m<sup>3</sup> at locations of relevant exposure. Based on recent results the Council could be minded to revoke the AQMA. However, the 2017 APR highlighted that any decision made to revoke the AQMA needs to be mindful of the potential development of the strategic LDP sites to the north of the AQMA, Plasdwr and BBC Studios. Whilst detailed air quality assessments undertaken as part of the planning process have modelled that there is unlikely to be a detrimental impact on air quality levels in the AQMA, this can only be fully verified through on going monitoring.

Therefore, in an effort to reassure local residents and to be totally satisfied that levels will remain compliant with the NO<sub>2</sub> standard, SRS on behalf of CC reviewed the non-automatic monitoring network of NO<sub>2</sub> diffusion tubes for 2018. As a result, new and amended monitoring sites have been allocated. Officers will further assess the potential to implement real-time capabilities in the Llandaff AQMA as part of the Council's statutory duties under Part IV of the Environment Act 1995. There are now four monitoring locations within the Llandaff AQMA.

**Monitoring for other pollutants did not result in other exceedences of National Air Quality Standards.**

**2018 Annual Progress Report**

Monitoring data for 2017 indicates that annual mean concentrations of nitrogen dioxide recorded at sites of relevant exposure, within the already established AQMAs, continue to be elevated or exceed the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>).

The datasets indicate that the annual average objective for NO<sub>2</sub> was breached at monitoring locations outside of the existing AQMAs (Sites 172, 179, 180 & 181).

It is felt that at this stage no further detailed assessments are required;

Site 172 is placed on Ocean Way to monitor potential impacts of traffic resulting from industrial developments in the area. The site is not representative of relevant exposure, the nearest being

>650m away. For 2018 Site 172 has been revoked from the monitoring network as it is felt that a strong trend of data has been collected at this location.

The 1-hour objective for NO<sub>2</sub> need only apply to site 179.

Sites 180 & 181 were implemented to monitor air quality levels and therefore the potential impacts to future occupants at new development sites. These developments were still under construction in 2017 and therefore datasets collected will be negatively influenced.

The report also documented the works ongoing to produce the CASAP document, as well as outlining the development of the Feasibility Study in line with the Legal Direction received from the Welsh Minister.

### **2019 Annual Progress Report**

Monitoring undertaken in 2018 confirmed annual average NO<sub>2</sub> levels continued to breach or encroach upon set limit values/ air quality standards within already established AQMAs (7 exceedances of the annual mean objective in total).

The report provided an update regarding the completion of the Clean Air Strategy and Action Plan document (CASAP), as well as an update of mitigation measures proposed to address air quality concerns for Cardiff. The report also documented the finalisation of the Full Business Case (FBC) and its outcome in accordance with Welsh Government's issued Legal Direction.

## **1.2 Air Quality Management Areas**

Air Quality Management Areas (AQMAs) are declared when air quality is close to or above an acceptable level of pollution, known as the air quality standard/ objective (See Appendix A)

Based on monitoring results and further detailed assessments, there are currently four Air Quality Management Areas (AQMAs) declared across Cardiff which have all been declared due to exceedances of the annual mean NO<sub>2</sub> Air Quality Standard (40ug/m<sup>3</sup>), known to be predominantly derived from road transport sources.

1. **Cardiff City Centre**- declared 1<sup>st</sup> April 2013
2. **Llandaff**- declared 1<sup>st</sup> April 2013
3. **Stephenson Court**- declared 1<sup>st</sup> December 2010
4. **Ely Bridge**- declared 1<sup>st</sup> Feb 2007

## **1.3 Implementation of Action Plans**

Each of the outlined AQMAs was declared as a result of road-traffic derived Nitrogen Dioxide (NO<sub>2</sub>).

Section 84 of the Environment Act 1995 ensures that action must then be taken at a local level which is outlined in a specific Air Quality Action Plan (AQAP) to ensure that air quality in the identified area improves. After declaring an AQMA the authority must prepare a **DRAFT** Air Quality Action Plan (AQAP) within 18 months setting out measures it intends to put in place to improve air quality to at least the air quality objectives, if not even better. The AQAP must be **formally** adopted prior to 24 months has elapsed. AQMA(s) are seen by local authorities as the focal points to channel resources into the most pressing areas of pollution as a priority.

In view of the statutory obligation to produce an AQAP for each AQMA, in 2019 SRS & CC developed a citywide Clean Air Strategy & Action Plan (CASAP) for Cardiff. The strategy is an evolving document and coincides with Cardiff's Capital Ambition report, helping to implement and deliver the priorities outlined in the Ambition report with an overarching aim to improve air quality to protect and improve public health in Cardiff. The CAS & Action Plan appoints strategic measures that will look to generate a positive impact to citywide air quality levels, in particular traffic derived NO<sub>2</sub> levels. Each measure has endured a cost benefit appraisal procedure by weighting the measures in terms of air quality impact, cost and timescale. The key theme of the strategic measures is to increase the uptake of sustainable modes of transport by influencing a behavioural change in Cardiff. The CASAP fulfils the requirements of the LAQM process to produce an Air Quality Action Plan (AQAP).

**Table 1– Progress on Measures to Improve Air Quality**

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
<b>Modal Shift &amp; Influencing Travel Choice</b>											
1.1	Increase Bus Use	Alternatives to private vehicle use	Proposals are in place for a park and ride system at Junction 33 which would look to intercept traffic on the A470, north Cardiff.	CC	No definite Start Date		Bus patronage figures produced via telematics	Unknown	Ongoing	Ongoing	
1.2	Promotion of cycling and walking	Promoting Travel Alternatives	DRAFT Cycling Strategy sets out to double number of cycling trips by 2026; 9.2% modal share in 2015 to 18.4% in 2026. Five cycleways proposed.	CC	Ongoing		Cycle trips generated/ questionnaires	Unknown	Public Consultation undertaken	Ongoing	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
			The INM prioritises cycling and walking routes over 15 year period.								
1.3	School Travel Plans		CC has engaged with 'Living Streets' charity and have developed a 'WOW' (Walk Once a Week) scheme in 7 allocated schools in Cardiff.	CC & Living Streets Charity	Ongoing		Report updates from Living Streets	Unknown	7 allocated schools in Cardiff supported by CC.	Ongoing	
1.4	School Travel Plans		Cardiff Council's Schools Streets Project and its Traffic Regulation	CC	Ongoing		Monthly average NO <sub>2</sub> levels examined at School property, Inside TRO and	Unknown	6 schools assigned to the TRO Zone pilot project in October 2019. Agreed to continue	End of 2021 (Subject to funding, possibly longer)	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
			Order (TRO) pilot project.				Outside TRO zone at residential facades. Questionnaires for school pupils and parents.		monitoring at these schools for a further 1 year.  2020- 9 additional schools to be added to the existing TRO Zone project. Funded is secured until end of 2021.		
1.5	Personalised Travel Planning	Promoting Travel Alternatives	Public Service Board Staff Charter.	Public Health Wales/ Vale and Cardiff Health Board	Working initially through Cardiff Public Services Board, a Healthy Travel Charter for Cardiff has been developed with major public sector employers and was launched in April 2019.		Modal shift counts.  Number of participating public sector organisations.	Unknown	The Charter was signed by 11 public sector organisations at launch in April 2019, employing over 33,000 staff, with additional public and private sector organisations subsequently invited to sign up to the Charter.		
1.6	Increase awareness of	Public Information	Cardiff 'car-free' day	CC	Completed 2019		Air Quality Measurements.	No target	When comparing Sunday 19th May to Car-Free Day		Try to geographically

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
	air quality concerns								event 12th May, the daily average reduction for NO2 is as follows;  Duke Street/ Castle Street- 16.11% Stephenson Court on Newport Road- 28.15% Westgate Street- 13.62% Lower Cathedral Road- +9.14%		expand and hold car-free days more regularly in Cardiff.
1.7			Tredegarville CIW Primary School "Green Wall" project.	CC	Complete	August 2019	Air quality levels recorded at the school via non-automated principle diffusion tubes.	No target	Successful application under the Landfill Communities Fund to cover the supply and installation of outdoor green walls at Tredegarville CIW Primary School. Successfully installed August 2019.		Investigate monthly average diffusion tube results following implementation.
<b>Infrastructure</b>											
2.1	Bus Route Improvement	Transport Planning and Infrastructure	City Centre Improvement Schemes (3 elements East side/ City Centre	CC & WG	2018	2019 (City Centre West Initiated) 2020 (city	FBC	To ensure development does not cause any adverse impact and	All Schemes have been initiated, however due to the COVID-19 pandemic,	2021	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
			North/ City Centre West)			centre north and east initiated)		where possible reduce levels to as low as reasonably practicable. Package of City Centre Schemes deemed to improve air quality levels for Castle Street by 15% (34.9µg/m3 approx).	schedule of works and final designs are being reviewed.		
2.2	Bus Route Improvement		Improve bus networks and efficiency of the service.	CC	Ongoing		Improvements to air quality levels monitored by indicative methods by CC at sensitive receptor locations on specified routes.	Unknown	Bus lanes have been installed on A470, A4119 & A48. Suggested 400m of bus lane ensures each bus with a time advantage of 5 minutes.		

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
2.3	Public Cycle hire Scheme		Next Bike Hire Scheme	CC & WG	Ongoing		Daily reports on usage provided to CC. 150,000 rentals reported since March 2018.	Unknown	50 docking stations installed providing 500 bicycles for public use. Extra 500 bicycles assigned to Cardiff for the end of Summer 2019.	Complete (1000 bikes on network).	
2.4	Cycle Network		Proposed Cycleways	CC	Ongoing		Cycling trip counts.	3.5% modal shift which aligns with the assumptions derived in the feasibility study.	Cycleway 1 St Andrew's Crescent to Senghennydd Road ( <b>works are complete for phase 1 of cycleway 1. Second phase is currently out for consultation</b> );  Cycleway 4 phase 1 (Bute	Ongoing	

Comments Relating to Emission Reductions	Estimated Completion Date	Progress to Date/ Progress in Last 12 Months	Target Annual Emission Reduction in the AQMA	Indicator	Implementation Phase	Planning Phase	Lead Authority	Focus	Category	Measure	No.
		<p>Park to Western Avenue), consultation ended May 2020.</p> <p><b><u>COVID Response</u></b> Two routes - the 'Cross City' and 'Bay Loop' cycleways - are being brought forward as part of the Council's ongoing COVID Recovery plans and are in line with the cycling vision set out in the Council's</p>									

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
									Transport White Paper.		
2.4	Public transport improvements- interchanges stations and services		New Cardiff Central Interchange development	CC	Ongoing		Detailed AQAs quantifying the level of impact to air quality levels.	To ensure development does not cause any adverse impact and where possible reduce levels to as low as reasonably practicable	Planning application received in 2018 for the central interchange proposal including new bus station. Planning consent granted subject to approval and discharge of conditions.		\$106 funding acquired for the amount of £10,000 to enhance air quality monitoring capabilities.
2.5			Cardiff Capital Region Metro -Proposed by WG (Rail and bus based rapid transit routes).	CC & WG	Ongoing		Unknown-supporting AQA will be a likely during the design and application stages	Ongoing	Ongoing		
2.6	20 mph zones	Traffic Management	Implement further speed restrictions and enhance those already established	CC	Ongoing		Safety figures & Monthly Average Diffusion tube results.	Unknown	CC has introduced 'signs only' 20mph limits in Cathays and	Ongoing	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
			"20mph Zones"						<p>Plasnewydd area. Approach coincides with the Safe Routes to School Programme.</p> <p>Plans are in place to hopefully expand 20mph limit areas in Grangetown. This is complete.</p>		
<b>Lower Emission Vehicles</b>											
3.1	Public Vehicle Procurement	Promoting Low Emission Transport	Ultra-Low Emission Bus (ULEB) fund made available by the Department for Transport (DfT).	CC, DfT & Cardiff Bus	Ongoing	Three year rolling programme 2019- 2021	Improvements to air quality levels (NO <sub>2</sub> ) monitored by indicative methods by CC at sensitive receptor locations on	Approximately >2µg/m <sup>3</sup> reductions in NO <sub>2</sub> sensitive receptor locations along Westgate Street	Application received by DfT and deemed successful. Programme roll out expected quarter 1 2021.		

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
3.2	Company Vehicle Procurement- Prioritising uptake of low emission vehicles/ EV recharging		Sustainable fuels strategy-assessment of Cardiff Council vehicle fleets	CC	Ongoing		specified routes  Economic savings and reduced Carbon footprint	Unknown	The Council has made progress in terms of increasing electric charging infrastructure at four main employment hubs. It has been agreed that in 2019/20 for 8 electric vehicle chargers each at County Hall, Lamby Way, Wilcox House and Coleridge Road (i.e., total of 32 chargers).	Ongoing	

Comments Relating to Emission Reductions	Estimated Completion Date	Progress to Date/ Progress in Last 12 Months	Target Annual Emission Reduction in the AQMA	Indicator	Implementation Phase	Planning Phase	Lead Authority	Focus	Category	Measure	No.
		<p>-Initial work by CTS was to ensure 90 Council vehicles were replaced by full EVs by 2021. Impacts from COVID has resulted in a delay to the progression. CTS are intending to review the wider fleet with Welsh Government Energy Service / ULEV. Following this review a revised timetable will be known or the delay</p>									

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
									period to the original plan. Potentially pushed back by 1 year.		
3.3	EV recharging		Increase EV optimistic charging points for Cardiff residents/ workers.	CC	Ongoing		EV vehicle counts/ EV point usage.	Unknown	<p>Progression of residential EV charging locations has ensured that 10 locations with a total of 18 fast charging points have been installed across the City. Second phase of 5 sites with 1 charge points was being progressed before being impacted by COVID – these are now planned for late August/ early September.</p> <p>Pilot project for installation of 6 Rapid Charging stations has been initiated with Enginie. One location has been fully installed with the remaining 5 locations now in final planning</p>		

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
									stages, and licenses being progressed.		
3.4	Taxi incentive to operate cleaner vehicles		Improve the emission standard profile of Cardiff's licensed Hackney and Private Hire Vehicles. Funding currently allocated to cover operating and maintenance costs over a set period for up to 620 vehicles.	CC & WG	Ongoing		Uptake for the funding.	To ensure development does not cause any adverse impact and where possible reduce levels to as low as reasonably practicable	Due to COVID-19, discussions have been initiated to discuss if the allocated grant funding can be best utilised by revising the taxi incentive to a more preferable option.		To achieve greatest air quality improvements zero emission or ULEV classified vehicles need to be incentivised.
3.5	Cardiff Clean Bus Retrofit Scheme 2020-21	Vehicle Retrofitting programmes	Improve the emissions profile by improving the euro standard	CC & WG	Ongoing		Number of bus vehicles converted;	FBC identifies that the retrofit programme can reduce levels of	Scheme went live on 1 <sup>st</sup> October 2020.		Timeframes are tight (deadline to implement goods and services is the 31 <sup>st</sup> March

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
			composition of bus fleets operated in Cardiff. Via a competitive tender application process, Cardiff Council will administer a retrofit scheme aimed at improving the emission output of bus vehicles operated in Cardiff.					Castle Street to 39.6µg/m <sup>3</sup> with 150 vehicles retrofitted.			2021). The tender process ends 31 <sup>st</sup> December 2020 with a view to appoint successful applicants funding in New year.
<b>Policy</b>											
4.1	Citywide strategy to reduce emissions and improve air quality	Policy Guidance and Development Control	Cardiff Clean Air Strategy and Action Plan (CASAP)	CC	2018		Recorded Improvements to air quality levels (NO <sub>2</sub> ) monitored by indicative methods by CC	Annual average NO <sub>2</sub> levels to be recorded at <35µg/m <sup>3</sup> at residential façade	Finalised and approved by Cabinet. Submitted to Welsh Government for review.	Ongoing	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
							at sensitive receptor locations	locations with specified AQMAs.			
4.2	Taxi Licensing Conditions	Promoting Low Emission Transport	Amendments made to Cardiff taxi licensing conditions to promote a cleaner fleet.	CC	2019- 2020		Taxi fleet composition %.		Public Consultation ended. Awaiting public protection committee decision.	Ongoing	
4.3	Transport White Paper		The Transport White Paper was launched on 15 January 2020 and lays out an ambitious 10-year plan to tackle the climate emergency, reduce congestion and improve air quality.	CC	2020- 2030		Improved air quality levels/ journey time. Sustainable modes patronage.	To generate air quality levels as low as reasonably practicable.	Published document 2020.		

## 2. Air Quality Monitoring Data and Comparison with Air Quality Objectives

### 2.1 Summary of Monitoring Undertaken in 2019

#### 2.1.1 Automatic Monitoring Sites

In 2019, Cardiff had three automatic air quality monitoring sites located at Frederick Street in the City Centre, Richard's Terrace, just off Newport Road and Lakeside Primary School.

##### **Cardiff Frederick Street (Urban Background)- AURN 1**

The site was commissioned in May 1992 and monitors on a 24/7 basis measuring levels of NO<sub>2</sub>, PM<sub>10</sub> & PM<sub>2.5</sub>, SO<sub>2</sub>, CO and O<sub>3</sub> feeding data directly into Defra's Automatic Urban and Rural Network (AURN).

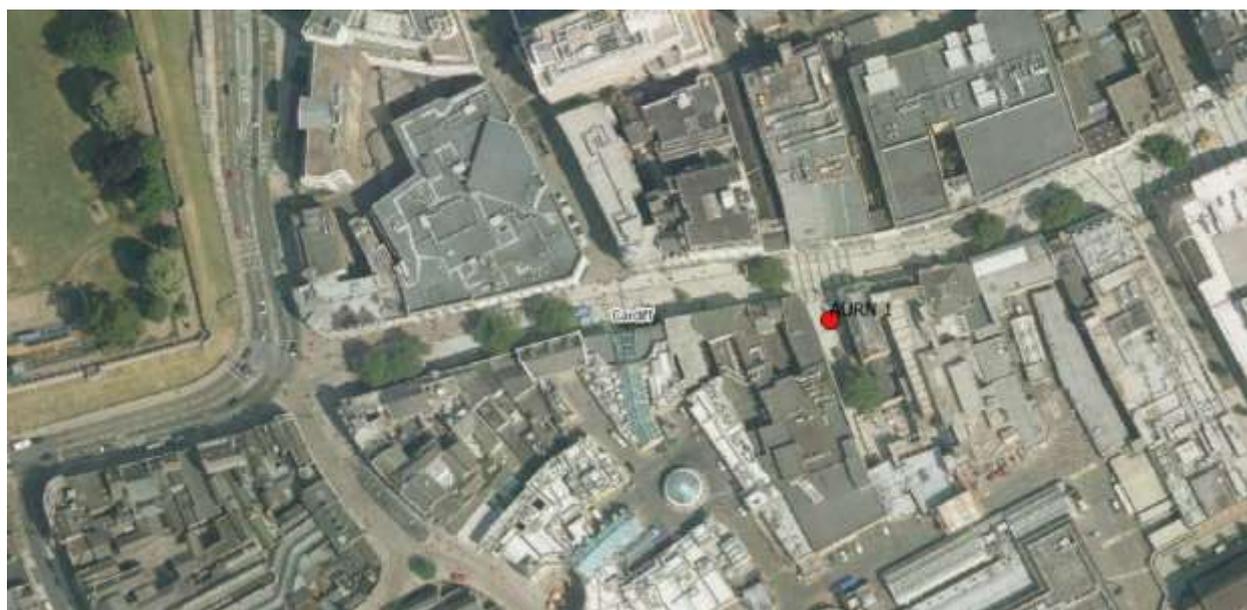
##### **Richard's Terrace, Newport Road (Urban Traffic)- AURN 2**

The site monitors on a 24/7 basis measuring levels of NO<sub>2</sub> & PM<sub>10</sub> at that location, feeding data directly into Defra's Automatic Urban and Rural Network (AURN).

Both sites AURN 1 & 2 are subject to six-monthly QA/QC audits by AEA, DEFRA's appointed contractor, and calibration gases are all traceable to National Standards. Calibrations have been carried out fortnightly by the appointed contractor.

For 2019, the Cardiff City Centre, Frederick Street Station achieved data capture levels for NO<sub>2</sub> and PM<sub>10</sub> at 62.5% and 67.7%. The Newport Road site captured levels for NO<sub>2</sub> and PM<sub>10</sub> at 99% and 96%.

**Figure 8- Location of Cardiff City Centre AURN Monitoring Site (AURN 1)**



**Figure 9- Location of Cardiff Newport Road AURN Monitoring Site (AURN 2)**



### **Cardiff Lakeside (Urban Background)**

The site monitors on a 24/7 basis measuring levels of Polycyclic aromatic hydrocarbons (PAH) at that location, feeding data directly into Defra's PAH Digital (solid phase) Network. SRS serve as a local site operator to this site, however data interpretation is sanctioned by the consultants Ricardo Energy and Environment Ltd, whereby concentrations are compared to the national air quality objective for B[a]P in ambient air, based on an annual mean concentration of 0.25ng/m<sup>3</sup>. Details can be found in the UK Air Quality Strategy (Defra, 2007). Therefore, the purpose of this site and results derived are not corresponded to any of the limit values outlined for the purposes of LAQM in Wales.

Summarised results for various pollutants for the outlined automatic monitoring stations can be found at <http://www.welshairquality.co.uk> & <https://uk-air.defra.gov.uk/interactive-map>

### **Additional Automated Monitors**

At the time of writing this report, Cardiff Council with the financial support of Welsh Government has commissioned a fourth automated monitoring site, located on Castle Street. The roadside site monitors on a 24/7 basis measuring levels of NO<sub>2</sub>, PM<sub>10</sub> & PM<sub>2.5</sub> at that location and forms part of the Welsh Automated Monitoring Network. Reporting for this site will be included in future reports.

In addition to the newly commissioned automated monitoring station on Castle Street, Cardiff Council has acquired the use of 6 near real time indicative air quality analysers. 5 analysers were purchased with the financial support of Welsh Government and the 6<sup>th</sup> analyser was facilitated by the SRS who had successfully accrued funding via a S106 planning contribution. The analysers have been specifically placed and represent relevant exposure. The analysers continuously monitor for Nitric Oxide, Nitrogen Dioxide & Ozone, PM<sub>10</sub> & PM<sub>2.5</sub>, and do so every 15 minutes (data uploaded every hour). Information regarding the specification of the monitors can be viewed at <https://www.aqmesh.com/product/>. These monitors do not form part of the regulated Welsh automated monitoring network, but as specified they are an indicative form of monitoring and a useful tool to look at datasets on a high-resolution basis. An online platform to access the available datasets is yet to be finalised with Cardiff Council's webpage development team.

### **Co-location Study**

There are three diffusion tubes co-located at the Cardiff City Centre, Frederick Street station, whereby at the end of year, depending on data capture and precision, a locally derived bias adjustment factor is calculated. Due to insufficient data capture <90% for the Cardiff City Centre AURN, in accordance with Defra's LAQM (TG16), Box 7.11 it is preferable not to perform a co-location study due to concerns associated with the data quality. The National Bias Adjustment Factor supplied by the LAQM Defra website, based on 42 studies, which appointed Socotec UK Ltd Didcot laboratory, gave a figure of 0.75 and so this has been adopted for ratification purposes. In order to provide a conservative approach it was therefore decided to adopt the nationally derived bias adjustment factor as this would give slightly higher concentrations and fundamentally represent a worst case scenario.

Table 2- Details of Automatic Monitoring Sites

Site Name	Site Type	X OS Grid Ref	Y OS Grid Ref	Pollutants Monitored	In AQMA?	Monitoring Technique	Relevant Exposure? (Y/N with distance (m) to relevant exposure)	Distance to kerb of nearest road (N/A if not applicable)	Does this location represent worst-case exposure?
Cardiff Centre AURN	Urban Background	318416	176525	NO <sub>2</sub>	N	Chemiluminescence	Y (5m)	200m	N
	Urban Background	318416	176525	PM <sub>10</sub> , PM <sub>2.5</sub>	N	TEOM- FDMS	Y (5m)	200m	N
	Urban Background	318416	176525	SO <sub>2</sub>	N	UV Fluorescence	Y (5m)	200m	N
	Urban Background	318416	176525	CO	N	Infra-Red GFC	Y (5m)	200m	N
	Urban Background	318416	176525	O <sub>3</sub>	N	UV Absorption	Y (5m)	200m	N
Cardiff Newport Road AURN	Roadside/ Urban Traffic	320095	177520	NO <sub>2</sub>	N	Chemiluminescence	Y (12m)	4.5m	N
	Roadside/ Urban Traffic	320095	177520	PM <sub>10</sub>	N	Beta Attenuation Monitor with Gravimetric Equivalence	Y (12m)	4.5m	N

## 2.1.2 Non-Automatic Monitoring Sites

In 2019 there were 101 specifically allocated non automatic monitoring sites across Cardiff which monitored levels of nitrogen dioxide (NO<sub>2</sub>). These sites are supported and maintained by SRS on behalf of the CC. The non-automatic sites do not provide live data; instead they consist of diffusion tubes which are placed at each of the sites, collected and replaced on a rolling monthly basis. The results derived from the tube sampling are then averaged over the year to enable a comparison of the results against the annual average (**40µg/m<sup>3</sup>**) and 1-hour (**200µg/m<sup>3</sup> not to be exceeded > 18 times per year**) air quality objectives for NO<sub>2</sub>.

### Analysis of Diffusion Tubes

**Annual Average-** Once erroneous data have been deleted, it is necessary to calculate the annual average. The data need to be annualised, and then bias corrected. In order to do this, firstly the annual average is calculated for all sites.

**Annualisation-** Where valid data capture for the year is less than 75% (9 months), where necessary the continuous and NO<sub>2</sub> diffusion tube monitoring data have been “annualised” following the methods as described in Defra’s LAQM (TG16), Boxes 7.9 & 7.10.

**Bias Adjustment-** After annualisation, the diffusion tubes should be corrected for bias. Bias represents the overall tendency of the diffusion tubes to under or over-read relative to the reference chemiluminescence analyser. This should not be confused with precision, which is an indication of how similar the results of duplicate or triplicate tubes are to each other. While it is possible to adjust diffusion tube results to account for bias, it is not possible to correct for poor precision. A spreadsheet-based tool has been developed that allows local authorities to easily calculate the bias and precision of their tubes.

There are two bias adjustment figures made available to Local Authorities. Firstly there is the Local Authorities’ local bias adjustment figure calculated using a co-location study at a local reference automated site (Frederick Street being the site used in Cardiff), and secondly there is the national bias adjustment factor derived by all individual co-location studies undertaken that utilise the same laboratory and analytical techniques for diffusion tube analysis. It must be decided which factor to use based upon quality assurance and increased certainty.

There are three diffusion tubes co-located at the Cardiff City Centre, Frederick Street station to determine a locally derived bias adjustment factor. The bias adjustment factor applied to Cardiff’s 2019 data is 0.75. The applied bias adjustment factor has been calculated using the national diffusion tube bias adjustment factor spreadsheet version 09/20 as appose to the local derived bias adjustment factor. Due to insufficient data capture <90% at the Frederick Street site during 2019, in accordance with Defra’s LAQM (TG16), Box 7.11 it is preferable not to perform a co-location study due to concerns associated with the data quality. The National Bias Adjustment Factor supplied by the LAQM Defra website, based on 42 studies, which appointed Socotec UK Ltd Didcot laboratory, gave a figure of 0.75 and so this has been adopted for ratification purposes.

**Distance Correction-** Where an exceedance is measured at a monitoring site not representative of public exposure, NO<sub>2</sub> concentration at the nearest relevant exposure has been estimated based on the “NO<sub>2</sub> fall-off with distance” calculator (<http://laqm.defra.gov.uk/tools-monitoring-data/no2-falloff.html>). The procedure is described in LAQM (TG16), Section 7.77-7.79.

## Sampling

It is important to site the diffusion tube in an area that is representative of relevant public exposure and therefore corresponds to the annual mean objective. With regards to prioritising ambient air quality sampling locations, the Council adopts a risk-based approach to any allocation of monitoring sites, considering the requirements of Local Air Quality Management Technical Guidance 16, February 2018. The designated monitoring locations have been assigned based on relevant exposure and where the certain Air Quality Objective levels for a particular pollutant applies. The document states that annual mean objectives should apply at “All locations where members of the public might be regularly exposed. Building facades of residential properties, schools, hospitals, car homes etc.”

In accordance with LAQM TG 16;

The site should be open to the sky, with no overhanging vegetation or buildings. It is important to place diffusion tubes where there is free circulation of air around the tube, but the opposite extreme should also be avoided, i.e. areas of higher than usual turbulence. For this reason, the tube should not be located on the corner of a building. Care should be taken to avoid any very localised sources, sinks of NO<sub>2</sub>, or disturbances to the airflow. For example, tubes should be mounted greater than 10m from the following:

- Heater flues (particularly low-level balanced flues);
- Bushes or trees overhanging or surrounding the tube location;
- Air conditioning outlets;
- Extractor vents; or
- Underground ventilation shafts.

The location, site description and data gathered since January 2019 are given in **Table 2**. The data has been gathered over a period of 12 months between January and December 2019, adhering to specific monitoring dates controlled by Defra.

## Laboratory Methods and Analysis of Diffusion Tubes

Analysis of the exposed tubes is carried out by Socotec UK Ltd Didcot operating procedure ANU/SOP/1015. The tubes are prepared by spiking acetone:triethanolamine (50:50) on the grids prior to the tubes being assembled. The tubes are desorbed with distilled water and the extract analysed using a segmented flow auto analyser with ultraviolet detection. As set out in the practical guidance the results were initially calculated assuming an ambient temperature of 11°C and then adjusted to 20°C to allow direct comparison with EU limits. The national bias correction factor for this laboratory was utilised as opposed to our own local co-location data. Adopting best practice guidance and adopting a conservative approach a bias correction factor of 0.75 was obtained and applied using the Defra website which is available using the following link; <https://laqm.defra.gov.uk/bias-adjustment-factors/national-bias.html>

Figure 10- Map Showing Location of Diffusion Tubes in and around the Cardiff City Centre AQMA

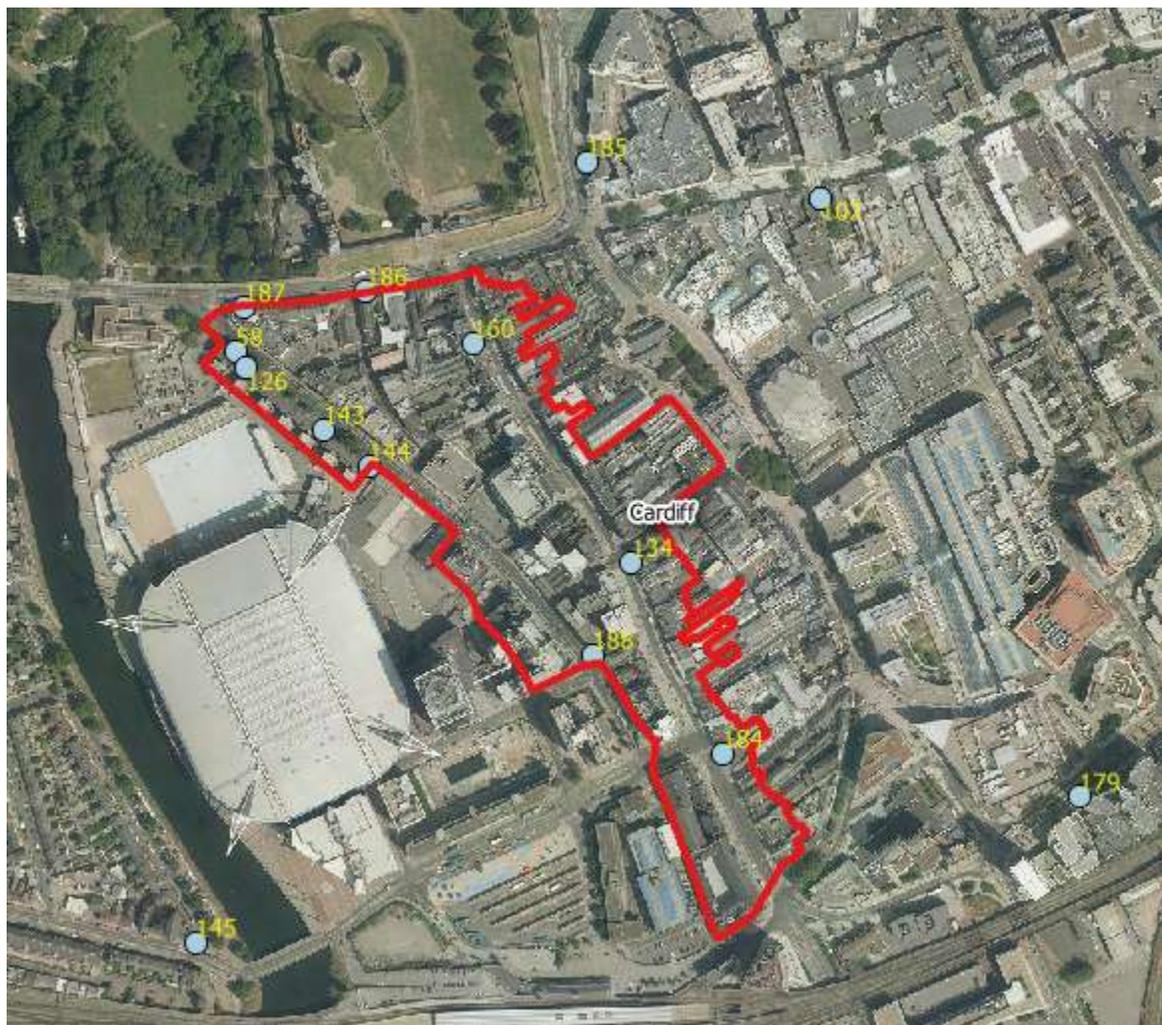


Figure 11- Map Showing Location of Diffusion Tubes in and around the Ely Bridge AQMA

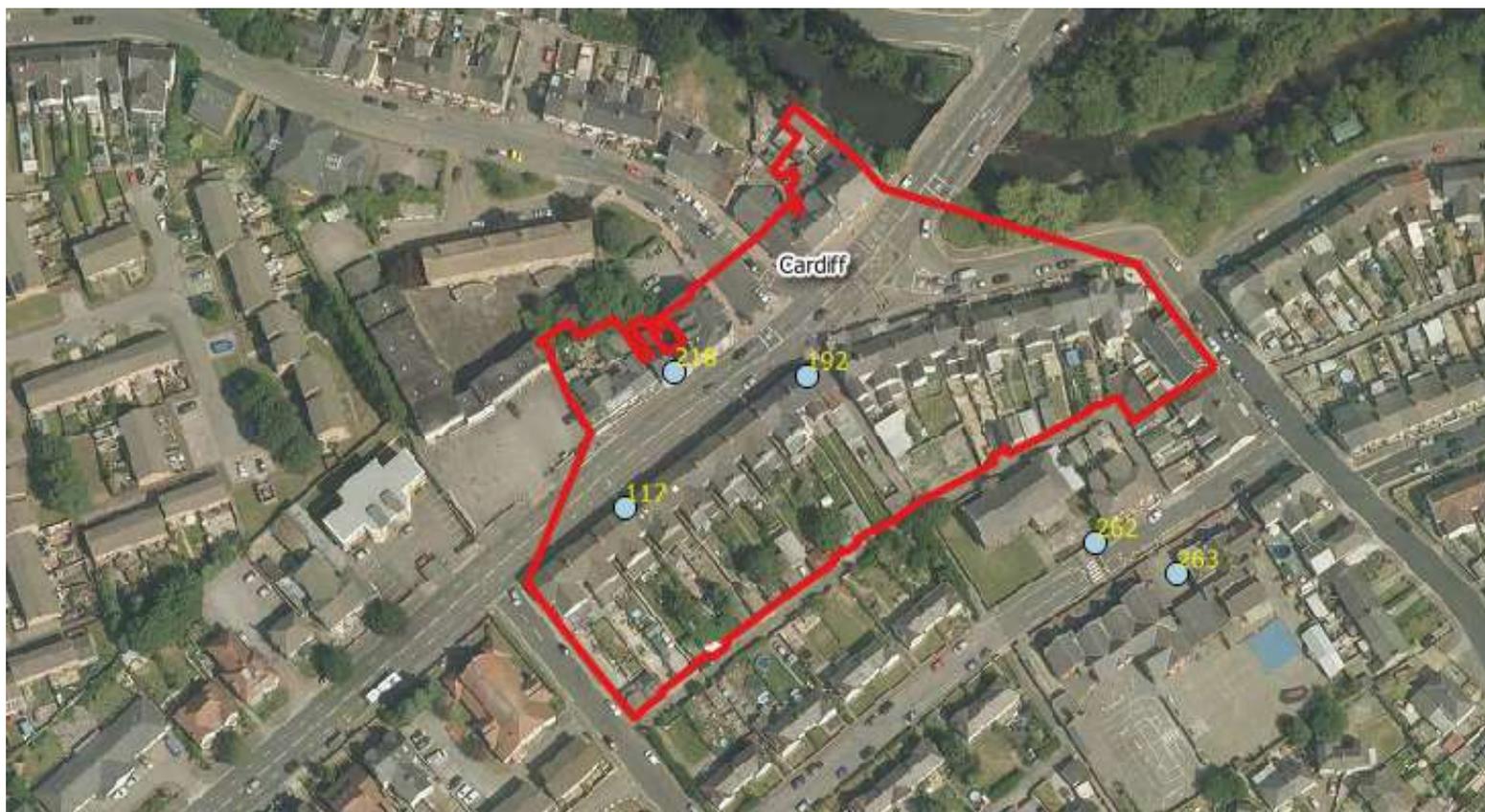


Figure 12- Map Showing Location of Diffusion Tubes in and around the Stephenson Court AQMA



Figure 13- Map Showing Location of Diffusion Tubes in and around the Llandaff AQMA



Figure 14- Map Showing Location of Diffusion Tubes on Cowbridge Road West



**Figure 15- Map Showing Location of Diffusion Tubes in Cathays & Adamsdown area**



Note; Site 221 is shown in its new location for 2020 following difficulty gaining access to its location in 2019 as a result of nearby construction works.

Figure 16- Map Showing Location of Diffusion Tubes in and around Newport Road

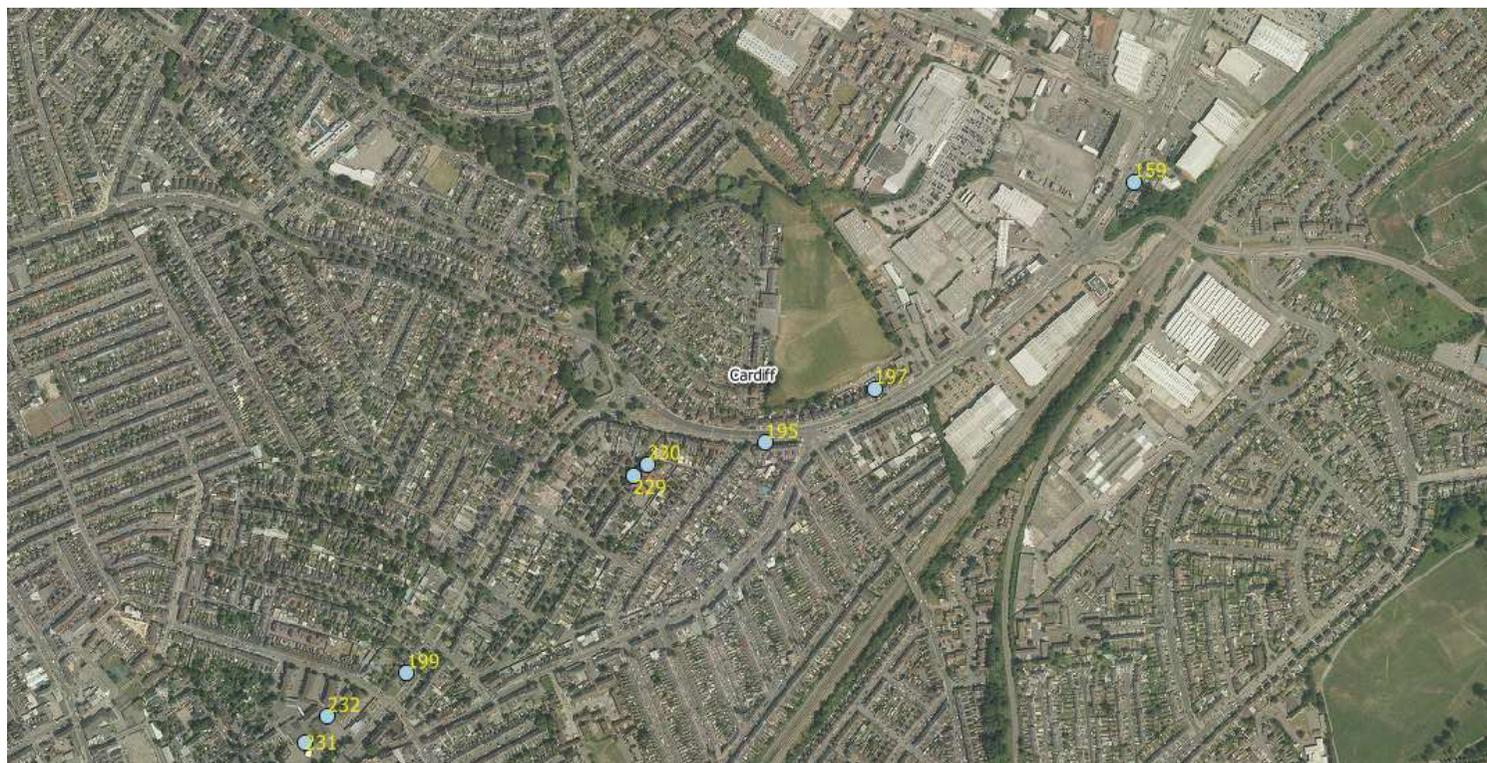


Figure 17- Map Showing Location of Diffusion Tubes in Llandaff area



Figure 18- Map Showing Location of Diffusion Tubes in the Western Avenue area



Figure 19- Map Showing Location of Diffusion Tube in Fairwater



Figure 20- Map Showing Location of Diffusion Tubes in Cathays & Gabalfa area

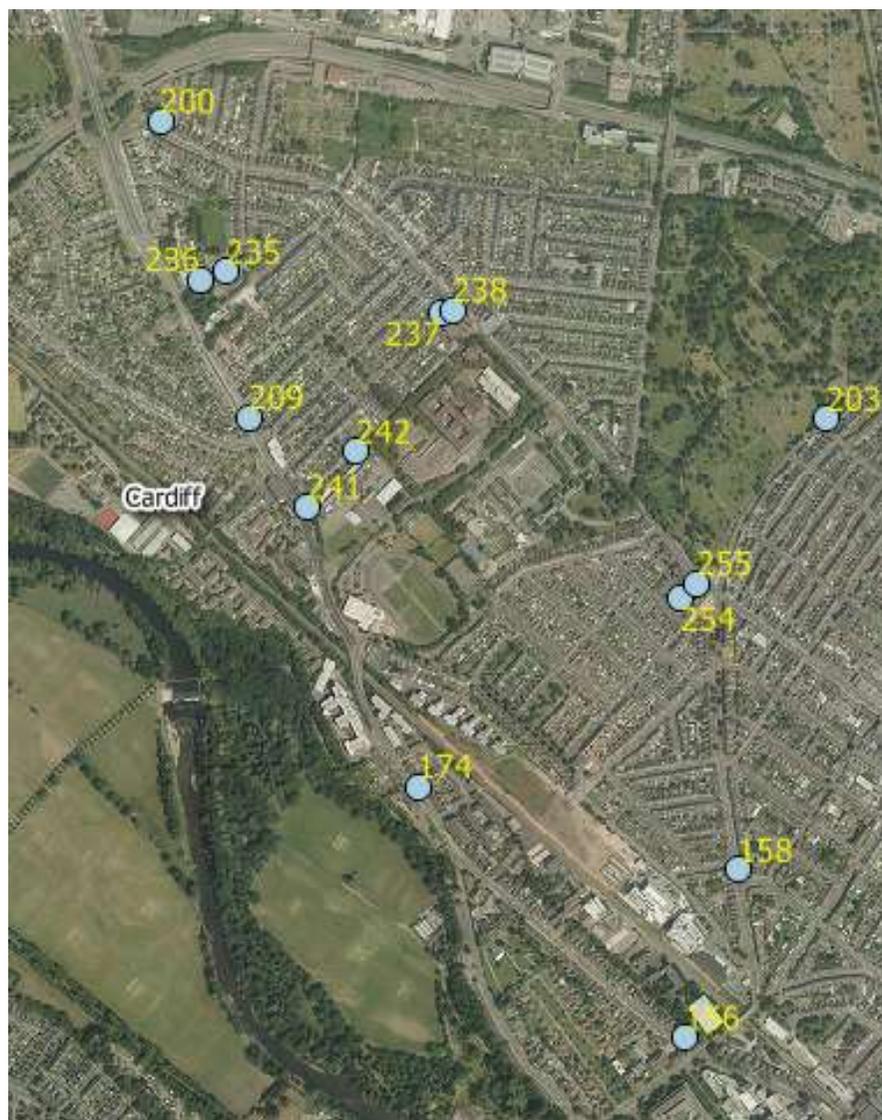


Figure 21- Map Showing Location of Diffusion Tubes in Riverside area

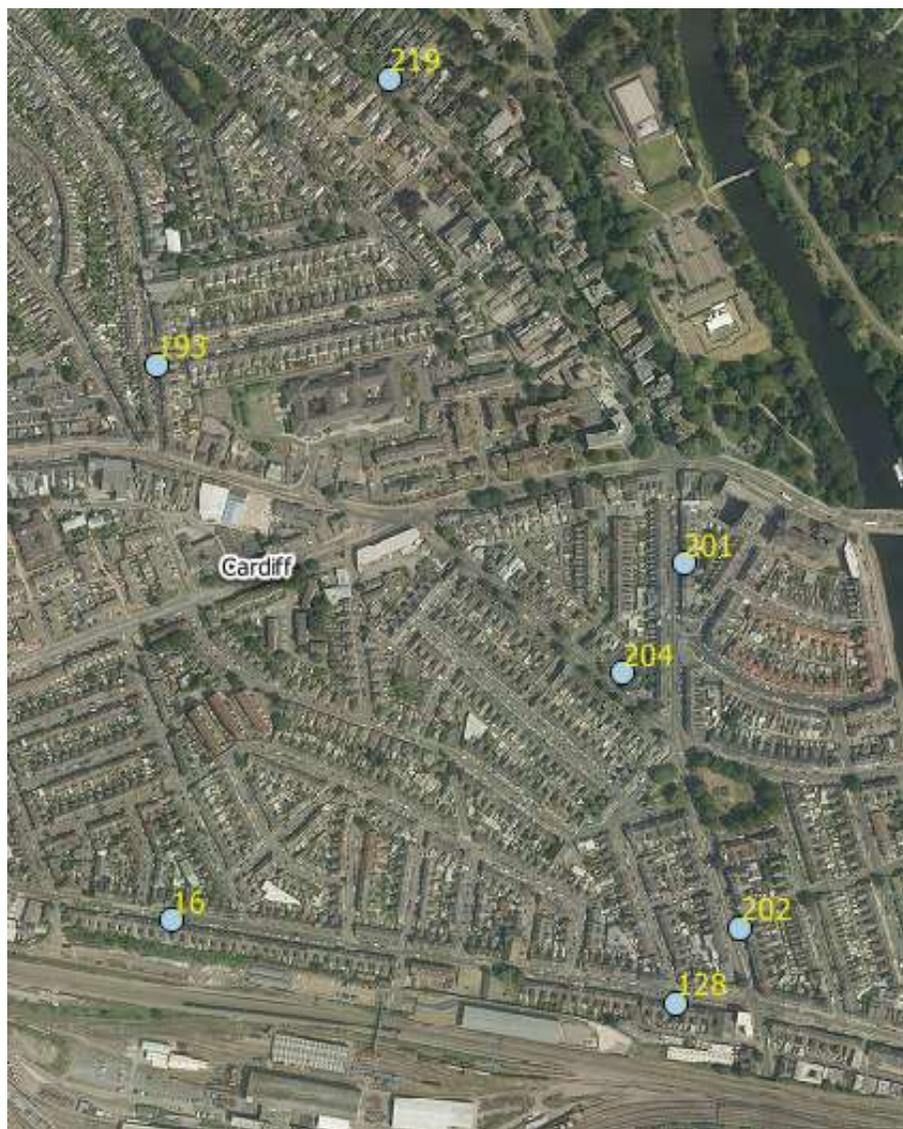


Figure 22- Map Showing Location of Diffusion Tubes in Canton area



Figure 23- Map Showing Location of Diffusion Tubes in Penylan area



Figure 24- Map Showing Location of Diffusion Tubes in Heath area

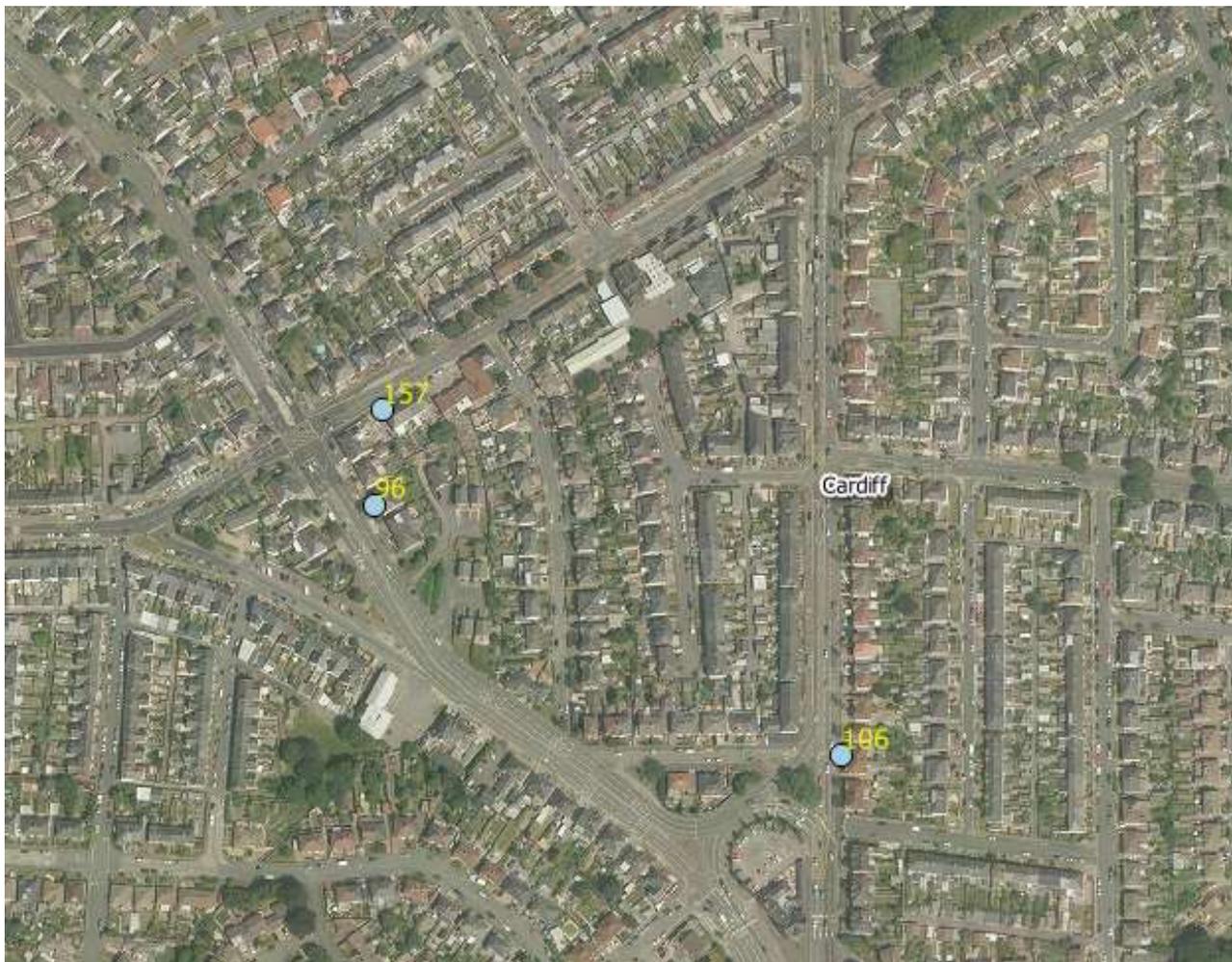


Figure 25- Map Showing Location of Diffusion Tubes around Butetown



Figure 26- Map Showing Location of Diffusion Tube in East Tyndall Street, Splott

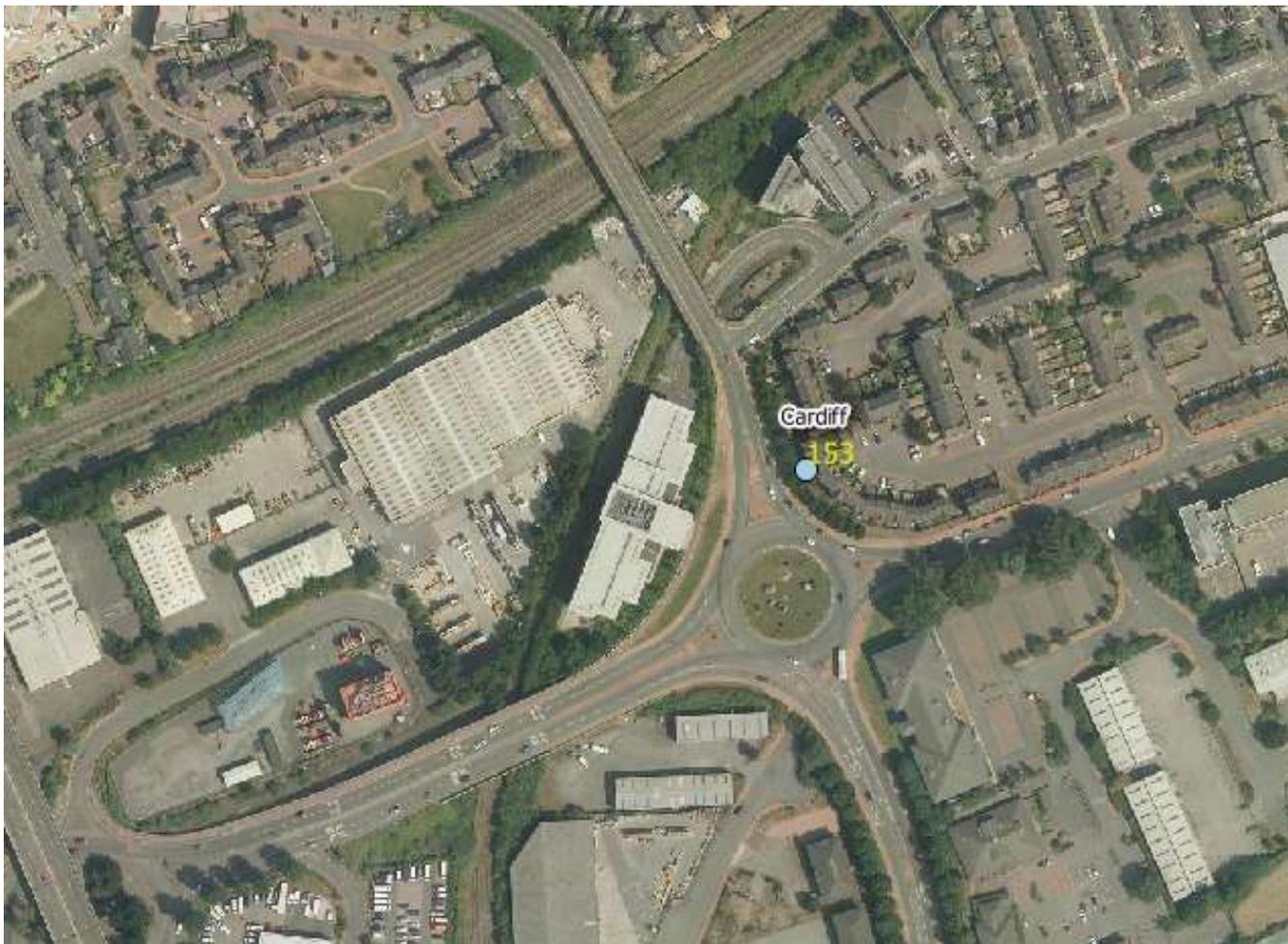


Figure 27- Map Showing Location of Diffusion Tubes on Penarth Road area

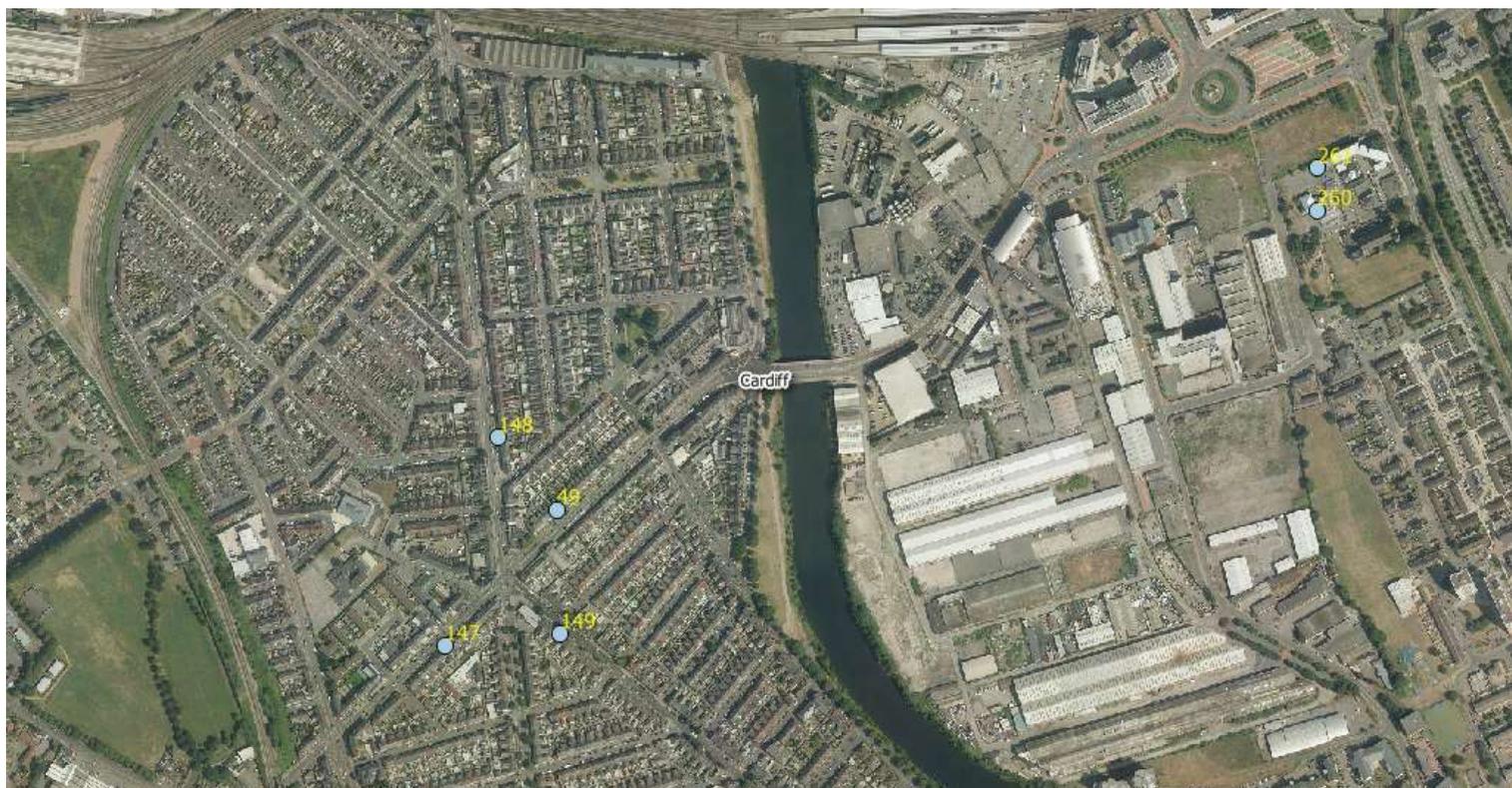


Figure 28- Map Showing Location of Diffusion Tube on Heol Isaf Road, Radyr

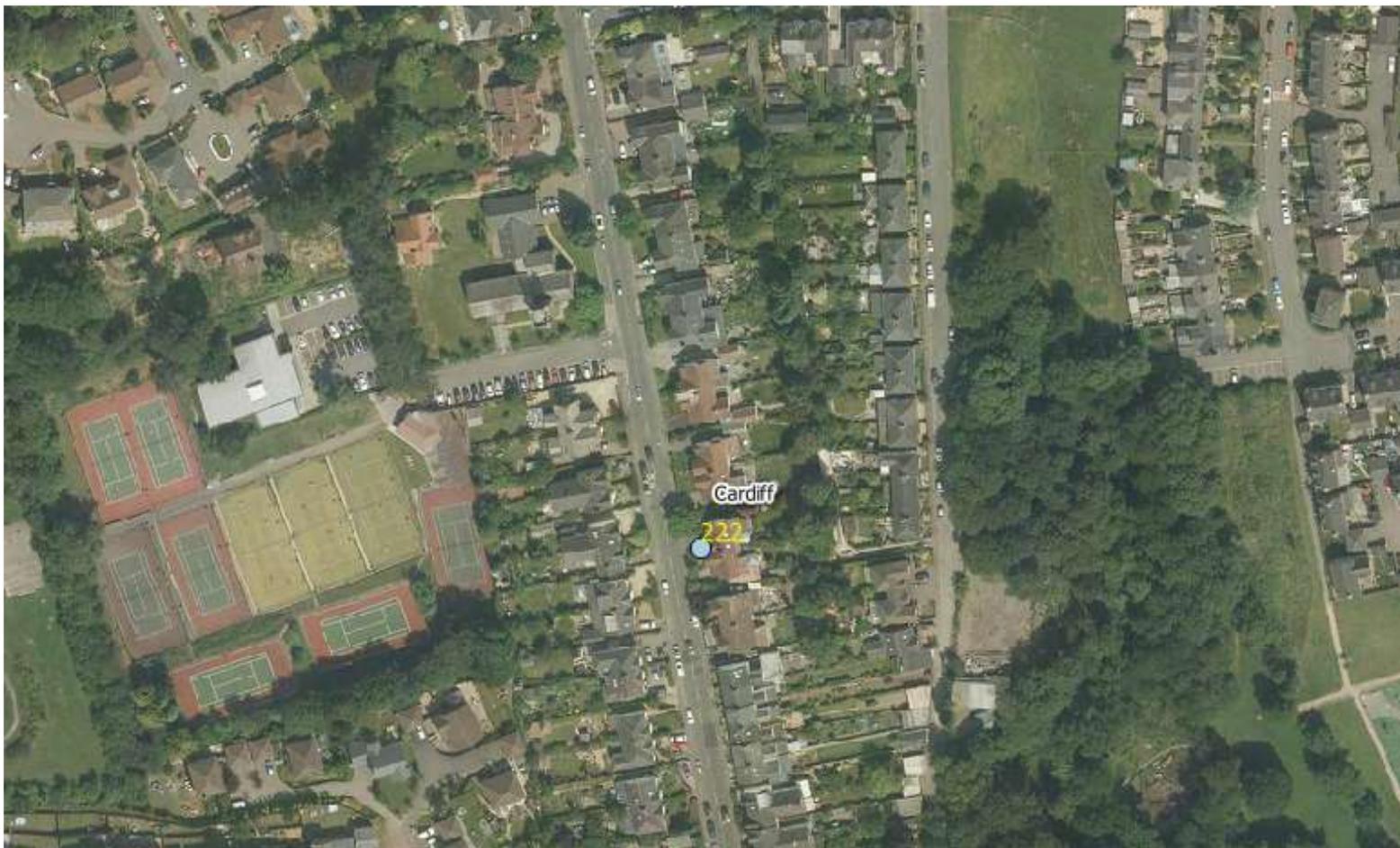


Figure 29- Map Showing Location of Diffusion Tubes on Caerphilly Road, Llanishen

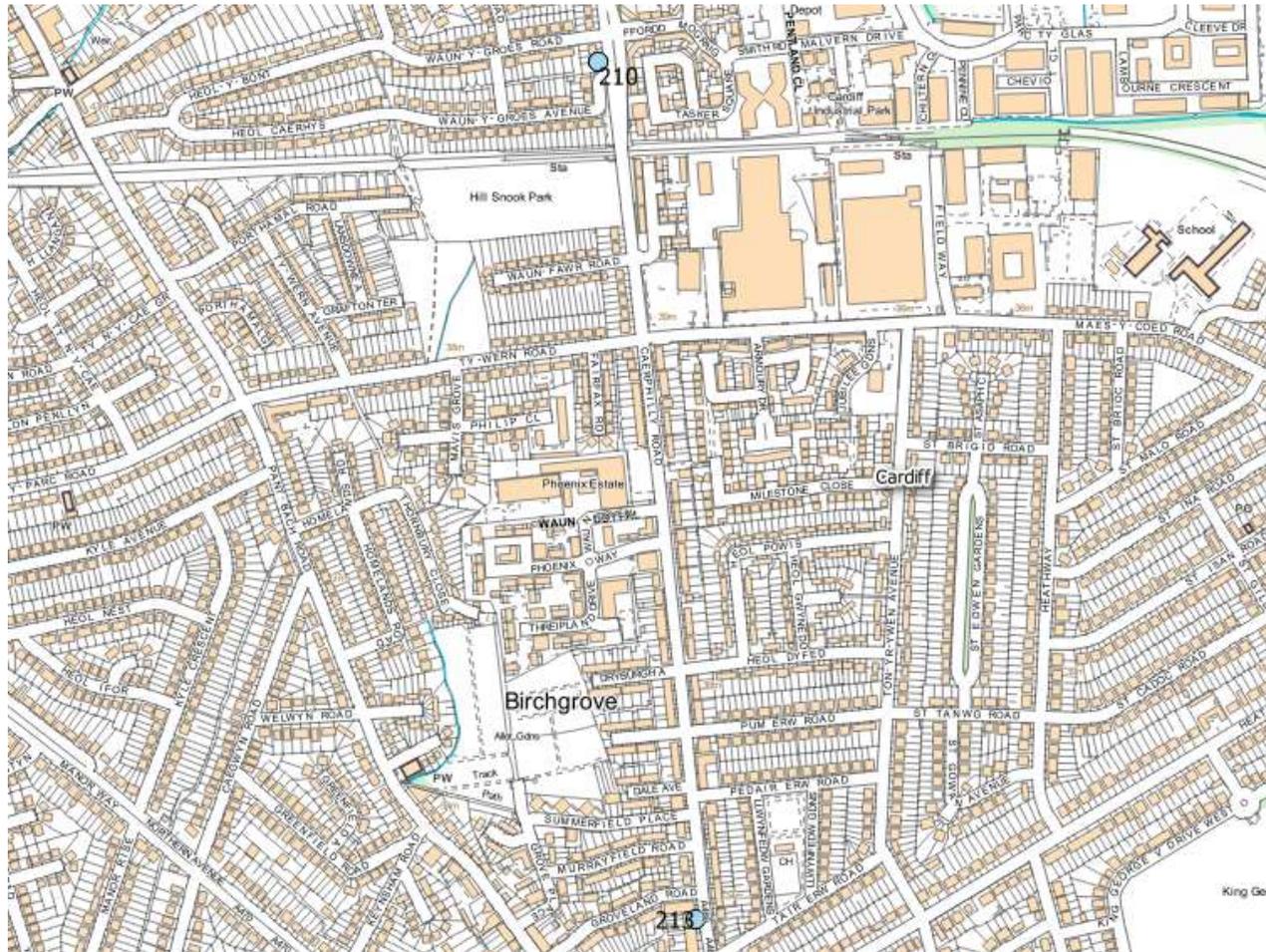


Figure 30- Map Showing Location of Diffusion Tube on Cathedral Road, Pontcanna



**Table 3- Details of Non-Automatic Monitoring Sites 2019**

Site ID	Site Name	Site Type	X OS Grid Reference	Y OS Grid Reference	Site Height (m)	Pollutants Monitored	In AQMA?	Is Monitoring Co-located with a Continuous Analyser (Y/N)	Relevant Exposure? (Y/N with distance (m) from monitoring site to relevant exposure)	Distance to Kerb of Nearest Road (m) (N/A if not applicable)	Does this Location Represent Worst-Case Exposure?
16	Ninian Park Road	Roadside	317040	176060	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	5m	Y
49	Penarth Road	Roadside	317760	175310	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	7m	Y
58	Westgate Street	Kerbside	317937	176400	2.5	NO <sub>2</sub>	Y	N	N (5m)	0.5m	Y
81	Stephenson Court	Roadside	319387	176980	2.0	NO <sub>2</sub>	Y	N	Y (0.05m)	5m	Y
86	19 Fair oak Road	Roadside	318452	178805	1.5	NO <sub>2</sub>	N	N	Y 0.10m)	10m	Y
96	Manor Way Junction	Roadside	316601	179653	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	5m	Y
98	Western Avenue (premises)	Roadside	314805	177345	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	10m	Y
99	Cardiff Road Llandaff	Roadside	315275	178117	1.5	NO <sub>2</sub>	Y	N	Y (0.05m)	3m	Y
101	Cardiff Centre AURN	Urban Centre	318416	176525	3.0	NO <sub>2</sub>	N	Y, Triplicate with Tubes 102 & 103	Y (0.10m)	200m	Y
102	Cardiff Centre AURN	Urban Centre	318416	176525	3.0	NO <sub>2</sub>	N	Y, Triplicate with Tubes 101 & 103	Y (0.10m)	200m	Y
103	Cardiff Centre AURN	Urban Centre	318416	176525	3.0	NO <sub>2</sub>	N	Y, Triplicate with Tubes 101 & 102	Y (0.10m)	200m	Y
106	30 Caerphilly Road	Roadside	316851	179520	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	5m	Y
112	17 Sloper Road	Roadside	316613	175910	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	5m	Y
115	21 Llandaff Road	Roadside	316604	176641	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	3m	Y
117	25 Cowbridge Road West	Roadside	314458	176735	2.0	NO <sub>2</sub>	Y	N	Y (0.05m)	2m	Y
126	Westgate Street Flats	Roadside	317946	176387	1.5	NO <sub>2</sub>	Y	N	Y (0.10m)	5m	Y
128	117 Tudor Street	Roadside	317540	175979	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	5m	Y
131	Dragon Court	Roadside	319292	176932	1.75	NO <sub>2</sub>	Y	N	Y (0.05m)	5m	Y
134	Sandringham Hotel	Roadside	318261	176229	2.0	NO <sub>2</sub>	Y	N	N (3m)	5m	Y
143	Windsor House	Roadside	318009	176337	1.5	NO <sub>2</sub>	Y	N	Y (0.10m)	6.5m	Y
144	Marlborough House	Roadside	318046	176307	1.5	NO <sub>2</sub>	Y	N	Y (0.10m)	6.5m	Y
145	Tudor Street Flats	Roadside	317904	175921	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	4.5m	Y
147	211 Penarth Road	Roadside	317636	175161	1.5	NO <sub>2</sub>	N	N	Y (0.10m)	7.0m	Y
148	161 Clare Road	Roadside	317695	175389	1.5	NO <sub>2</sub>	N	N	Y (0.05)	5.0m	Y
149	10 Corporation Road	Roadside	317764	175174	1.5	NO <sub>2</sub>	N	N	Y (0.05)	4.6m	Y
153	Magic Roundabout	Roadside	319491	176183	1.5	NO <sub>2</sub>	N	N	Y (0.10m)	12.5m	Y
156	2a/4 Colum Road	Roadside	317997	177412	1.5	NO <sub>2</sub>	N	N	Y (0.10m)	5.0m	Y
157	47 Birchgrove Road	Roadside	316605	179703	1.5	NO <sub>2</sub>	N	N	Y (0.10m)	8.0m	Y
158	64/66 Cathays Terrace	Roadside	318093	177716	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	3.0m	Y
159	IMO façade replacement	Roadside	320709	177918	1.5	NO <sub>2</sub>	N	N	Y (0.10m)	4.0m	Y

Site ID	Site Name	Site Type	X OS Grid Reference	Y OS Grid Reference	Site Height (m)	Pollutants Monitored	In AQMA?	Is Monitoring Co-located with a Continuous Analyser (Y/N)	Relevant Exposure? (Y/N with distance (m) from monitoring site to relevant exposure)	Distance to Kerb of Nearest Road (m) (N/A if not applicable)	Does this Location Represent Worst-Case Exposure?
160	High Street Zizzi	Urban Centre	318131	176407	2.0	NO <sub>2</sub>	Y	N	Y (0.10m)	65m	Y
166	163 Lansdowne Road	Roadside	315950	176424	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	5.4m	Y
168	570 Cowbridge Road East	Roadside	314856	176929	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	4.8m	Y
174	76 North Road	Kerbside	317508	177868	1.5	NO <sub>2</sub>	N	N	Y (0.1m)	1m	Y
179	Altolusso, Bute Terrace	Roadside	318627	176039	2.0	NO <sub>2</sub>	N	N	N (5.1m)	2.1m	N
183	Station Terrace	Kerbside	318765	176623	2.0	NO <sub>2</sub>	N	N	N (5.5m)	0.5m	Y
184	Hophouse, St Mary Street	Roadside	318335	176074	2.0	NO <sub>2</sub>	Y	N	Y (0.05m)	3.0m	Y
185	Northgate House, Duke Street	Roadside	318224	176554	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	9.65m	Y
186	Dempsey's Public House, Castle Street	Roadside	318044	176449	2.0	NO <sub>2</sub>	Y	N	Y (0.05m)	2.90m	Y
187	Angel Hotel	Roadside	317944	176436	2.0	NO <sub>2</sub>	Y	N	Y (0.05m)	2.85m	Y
188	Westgate Street (45 Apartments)	Roadside	318229	176154	1.8	NO <sub>2</sub>	Y	N	Y (0.05m)	3.30m	Y
190	3 Pearson Street	Kerbside	319056	177343	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	0.75m	Y
191	7 Mackintosh Place	Roadside	318724	177776	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	3.0m	Y
192	3 Cowbridge Road West	Roadside	314505	176769	2.0	NO <sub>2</sub>	Y	N	Y (0.05m)	3.0m	Y
193	24 Kings Road	Roadside	317025	176607	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	3.0m	Y
194	115 Cowbridge Road West	Roadside	313870	176212	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	12.5m	Y
195	244 Newport Road	Roadside	320147	177523	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	6.0m	Y
196	2 Pencisely Road	Roadside	316223	177305	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	6.5m	Y
197	GFF 369 Newport Road	Roadside	320313	177605	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	6.5m	Y
198	Next Building to Stephenson Court	Roadside	319348	176958	2.0	NO <sub>2</sub>	Y	N	Y (0.05m)	4.6m	Y
199	157 Newport Road	Roadside	319599	177174	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	12.6m	Y
200	350 Whitchurch Road	Roadside	317038	179073	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	3.5m	Y
201	23 Lower Cathedral Road	Roadside	317547	176411	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	3m	Y

Site ID	Site Name	Site Type	X OS Grid Reference	Y OS Grid Reference	Site Height (m)	Pollutants Monitored	In AQMA?	Is Monitoring Co-located with a Continuous Analyser (Y/N)	Relevant Exposure? (Y/N with distance (m) from monitoring site to relevant exposure)	Distance to Kerb of Nearest Road (m) (N/A if not applicable)	Does this Location Represent Worst-Case Exposure?
202	22 Clare Street	Roadside	317604	176053	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	3.5m	Y
203	10 Fair oak Road	Roadside	318255	178533	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	4.5m	Y
204	53 Neville Street	Roadside	317487	176303	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	5m	Y
207	42 Waungron Road	Roadside	314769	177343	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	6.8m	Y
208	2 Llantrisant Road	Roadside	315152	178245	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	3m	Y
209	178 North Road	Roadside	317200	178537	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	3.5m	Y
210	485 Caerphilly Road	Roadside	316692	181088	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	7.5m	Y
211	19 Well Wood Close, Penylan	Roadside	320247	178903	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	28m	Y
212	62 Bridge Road	Kerbside	315197	178221	2.0	NO <sub>2</sub>	Y	N	Y (0.05m)	1m	Y
213	Birchgrove Village	Roadside	316814	180012	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	6.5m	Y
214	Mitre Place	Roadside	315254	178153	2.0	NO <sub>2</sub>	Y	N	Y (0.05m)	3.5m	Y
216	Lampost Adjacent to James St Flats	Roadside	318976	174596	2.0	NO <sub>2</sub>	N	N	N (6.5m)	1.0m	N
217	7 Avondale Road	Roadside	318312	174688	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	6.8m	Y
218	16-18 Cowbridge Road West	Roadside	314471	176770	2.0	NO <sub>2</sub>	Y	N	Y (0.05m)	4.2m	Y
219	Pontcanna Inn Lampost	Kerbside	317256	176889	2.0	NO <sub>2</sub>	N	N	N (10m)	1m	N
220	Fitzalan Court Newport Road	Kerbside	318955	176689	2.0	NO <sub>2</sub>	N	N	N (6.5m)	1m	N
221	Stuttgarter Strasse (New student flats)	Kerbside	318530	176823	2.0	NO <sub>2</sub>	N	N	N (8m)	1m	N
222	Heol Isaf, Radyr	Roadside	313314	180094	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	5.2m	Y
223	St Fagans Road, Fairwater	Roadside	313668	177468	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	12.2m	Y
224	110 Cardiff Road	Roadside	315714	177738	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	4m	Y
225	Mount Stuart Primary Rear Entrance	Other	318825	174435	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	50.0m	Y
226	Mount Stuart Primary Classroom	Other	318821	174433	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	51.0m	Y
227	Tredegaville Primary Reception	Other	319227	176802	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	42.0m	Y
228	Tredegaville Primary Playground	Roadside	319251	176821	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	10.4m	Y
229	Stacey Primary playground	Other	319945	177474	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	70.0m	Y

Site ID	Site Name	Site Type	X OS Grid Reference	Y OS Grid Reference	Site Height (m)	Pollutants Monitored	In AQMA?	Is Monitoring Co-located with a Continuous Analyser (Y/N)	Relevant Exposure? (Y/N with distance (m) from monitoring site to relevant exposure)	Distance to Kerb of Nearest Road (m) (N/A if not applicable)	Does this Location Represent Worst-Case Exposure?
230	Stacey Primary Outside reception	Other	319967	177490	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	72.0m	Y
231	St Peter Primary playground	Other	319443	177069	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	53.0m	Y
232	St Peter Primary near entrance	Other	319478	177108	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	35.0m	Y
233	Cardiff Academy Front Entrance	Other	319103	176922	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	35.0m	Y
234	Cardiff Academy rear entrance	Other	319109	176914	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	35.0m	Y
235	St Joseph's RC Primary playground	Other	317158	178800	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	47.0m	Y
236	St Joseph's RC Primary rear entrance	Other	317111	178786	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	67.0m	Y
237	Ysgol Mynydd Bychan Entrance	Roadside	317551	178724	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	3.0m	Y
238	Ysgol Mynydd Bychan Playground	Roadside	317572	178731	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	3.0m	Y
239	St Teilos School near main entrance	Other	320592	179940	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	96.0m	Y
240	St Teilos School rear playground	Other	320578	179786	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	70.0m	Y
241	Cathays High School North road facing	Roadside	317307	178374	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	11.0m	Y
242	Cathays High School rear entrance	Roadside	317396	178474	2.0	NO <sub>2</sub>	N	N	Y (0.05m)	7.0m	Y
<b>NRW SCHOOL MONITORING</b>											
254	St Monica's Whitchurch Rd	Roadside	317989	178207	2.0	NO <sub>2</sub>	N	N	(Y) 0.00	N/A	Y
255	St Monica's Playground	Roadside	318019	178236	2.0	NO <sub>2</sub>	N	N	(Y) 0.00	N/A	Y
256	Rhiwbeina Car Park	Roadside	315718	181310	2.0	NO <sub>2</sub>	N	N	(Y) 0.00	N/A	Y
257	Rhiwbeina Near Entrance	Roadside	315752	181339	2.0	NO <sub>2</sub>	N	N	(Y) 0.00	N/A	Y
258	Thornhill Playground	Roadside	317419	183152	2.0	NO <sub>2</sub>	N	N	(Y) 0.00	N/A	Y
259	Thornhill Entrance	Roadside	317438	183176	2.0	NO <sub>2</sub>	N	N	(Y) 0.00	N/A	Y
260	St Marys Near Playground	Roadside	318602	175638	2.0	NO <sub>2</sub>	N	N	(Y) 0.00	N/A	Y
261	St Marys Building	Roadside	318603	175684	2.0	NO <sub>2</sub>	N	N	(Y) 0.00	N/A	Y
262	Millbank Playground	Roadside	314580	176726	2.0	NO <sub>2</sub>	N	N	(Y) 0.00	N/A	Y
263	Millbank Nursery	Roadside	314601	176718	2.0	NO <sub>2</sub>	N	N	(Y) 0.00	N/A	Y
264	Lansdowne Primary	Roadside	315790	176612	2.0	NO <sub>2</sub>	N	N	(Y) 0.00	N/A	Y
265	Lansdowne Primary	Roadside	315783	176533	2.0	NO <sub>2</sub>	N	N	(Y) 0.00	N/A	Y

**Notes:**

1. 0.05m if the monitoring site is at a location of exposure (e.g. installed on the façade of a residential property)

## 2.2 2019 Air Quality Monitoring Results

**Table 4– Non-automatic Annual Mean NO<sub>2</sub> Monitoring Results (2015- 2019)**

Site ID	Site Type	Monitoring Type	Valid Data Capture 2019 (%) <sup>(1)</sup>	Within AQMA?	Annual mean concentration (adjusted for bias) µg/m <sup>3(2)</sup>				
					2015 (Bias Adjustment Factor = 0.79)	2016 (Bias Adjustment Factor = 0.78)	2017 (Bias Adjustment Factor = 0.77)	2018 (Bias Adjustment Factor = 0.76)	2019 (Bias Adjustment Factor = 0.75)
16	Roadside	Diffusion Tube	100.0	N	27.86	28.9	28.9	27.8	27.3
49	Roadside	Diffusion Tube	100.0	N	29.35	30.4	27.7	27.3	28.1
58	Kerbside	Diffusion Tube	83.3	Y	<b>48.25</b>	<b>45.3</b>	<b>44.5<sup>2</sup></b>	<b>45.8</b>	<b>41.2</b>
81	Roadside	Diffusion Tube	100.0	Y	35.29	37.6	35.9	34.9	34.4
86	Roadside	Diffusion Tube	100.0	N	34.85	35.6	37.0	33.4	31.7
96	Roadside	Diffusion Tube	100.0	N	31.05	36.9	31.8	31.4	29.4
98	Roadside	Diffusion Tube	100.0	N	25.44	28.4	26.2	26.1	24.6
99	Roadside	Diffusion Tube	100.0	Y	29.84	34.8	31.0	31.7	30.4
101	Urban Centre	Diffusion Tube	0.0	N	20.28	23.1	21.3	21.1	NR
102	Urban Centre	Diffusion Tube	0.0	N	21.06	22.5	20.9	20.6	NR

Site ID	Site Type	Monitoring Type	Valid Data Capture 2019 (%) <sup>(1)</sup>	Within AQMA?	Annual mean concentration (adjusted for bias) $\mu\text{g}/\text{m}^3$ <sup>(2)</sup>				
					2015 (Bias Adjustment Factor = 0.79)	2016 (Bias Adjustment Factor = 0.78)	2017 (Bias Adjustment Factor = 0.77)	2018 (Bias Adjustment Factor = 0.76)	2019 (Bias Adjustment Factor = 0.75)
103	Urban Centre	Diffusion Tube	0.0	N	20.72	23.2	21.6	20.7	NR
106	Roadside	Diffusion Tube	100.0	N	29.41	32.2	31.5	27.8	28.3
112	Roadside	Diffusion Tube	100.0	N	27.06	29.5	27.4	26.7	25.8
115	Roadside	Diffusion Tube	100.0	N	32.47	32.8	32.7	30.0	30.6
117	Roadside	Diffusion Tube	91.7	Y	39.54	<b>41.3</b>	38.0	<b>40.0</b>	36.8
126	Roadside	Diffusion Tube	75.0	Y	36.00	38.4	39.4 <sup>2</sup>	35.1	33.3
128	Roadside	Diffusion Tube	100.0	N	29.57	31.2	29.8	28.3	29.8
131	Roadside	Diffusion Tube	100.0	Y	39.48	39.6	<b>41.7</b>	38.2	35.7
134	Roadside	Diffusion Tube	66.7	Y	32.07	38.2 <sup>a</sup>	37.3 <sup>2</sup>	36.7 <sup>2</sup>	29.7 <sup>2</sup>
143	Roadside	Diffusion Tube	75.0	Y	38.16	38.7	38.4 <sup>2</sup>	37.3	35.6
144	Roadside	Diffusion Tube	75.0	Y	37.22	38.3	36.8 <sup>2</sup>	34.3	33.9
145	Roadside	Diffusion Tube	91.7	N	29.90	29.9	29.6	28.7	28.8

Site ID	Site Type	Monitoring Type	Valid Data Capture 2019 (%) <sup>(1)</sup>	Within AQMA?	Annual mean concentration (adjusted for bias) $\mu\text{g}/\text{m}^3$ <sup>(2)</sup>				
					2015 (Bias Adjustment Factor = 0.79)	2016 (Bias Adjustment Factor = 0.78)	2017 (Bias Adjustment Factor = 0.77)	2018 (Bias Adjustment Factor = 0.76)	2019 (Bias Adjustment Factor = 0.75)
147	Roadside	Diffusion Tube	100.0	N	27.70	28.8	26.2	29.3	26.9
148	Roadside	Diffusion Tube	100.0	N	27.53	29.2	27.3	26.6	25.6
149	Roadside	Diffusion Tube	100.0	N	33.56	31.2	32.5	31.3	30.1
153	Roadside	Diffusion Tube	100.0	N	28.99	30.1	30.6	25.0	25.0
156	Roadside	Diffusion Tube	100.0	N	25.92	29.7	25.7	26.8	24.8
157	Roadside	Diffusion Tube	100.0	N	27.16	28.2	28.3	25.1	23.6
158	Roadside	Diffusion Tube	100.0	N	25.50	29.0	26.1	26.2	24.2
159	Roadside	Diffusion Tube	100.0	N	33.96	35.5	38.6	35.6	32.2
160	Urban Centre	Diffusion Tube	83.3	Y	27.03	31.7	28.1 <sup>2</sup>	27.0	23.5
166	Roadside	Diffusion Tube	100.0	N	32.05	33.2	32.1	30.6	31.4
168	Roadside	Diffusion Tube	100.0	N	24.26	27.7	26.2	26.0	24.7
174	Kerbside	Diffusion Tube	100.0	N	28.65	33.3	27.5	28.2	26.8

Site ID	Site Type	Monitoring Type	Valid Data Capture 2019 (%) <sup>(1)</sup>	Within AQMA?	Annual mean concentration (adjusted for bias) $\mu\text{g}/\text{m}^3$ <sup>(2)</sup>				
					2015 (Bias Adjustment Factor = 0.79)	2016 (Bias Adjustment Factor = 0.78)	2017 (Bias Adjustment Factor = 0.77)	2018 (Bias Adjustment Factor = 0.76)	2019 (Bias Adjustment Factor = 0.75)
179	Roadside	Diffusion Tube	41.7	N	-	39.7 <sup>2</sup>	45.4 <sup>2</sup>	43.2	33.1 <sup>2</sup>
183	Kerbside	Diffusion Tube	100.0	N	-	35.9	31.2	31.1	30.9
184	Roadside	Diffusion Tube	50.0	Y	-	41.4	38.7 <sup>2</sup>	39.9	40.5 <sup>2</sup>
185	Roadside	Diffusion Tube	91.7	N	-	37.1	28.6 <sup>2</sup>	32.9	31.3
186	Roadside	Diffusion Tube	83.3	Y	-	47.5	47.7 <sup>2</sup>	45.8	42.7
187	Roadside	Diffusion Tube	58.3	Y	-	50.7	50.2 <sup>2</sup>	50.8	43.9 <sup>2</sup>
188	Roadside	Diffusion Tube	58.3	Y	-	49.8 <sup>2</sup>	49.8 <sup>2</sup>	52.4 <sup>2</sup>	43.7 <sup>2</sup>
190	Kerbside	Diffusion Tube	100.0	N	-	-	-	23.2	23.4
191	Roadside	Diffusion Tube	100.0	N	-	-	-	29.7	27.9
192	Roadside	Diffusion Tube	100.0	Y	-	-	-	39.7	38.6
193	Roadside	Diffusion Tube	100.0	N	-	-	-	18.6	19.3
194	Roadside	Diffusion Tube	100.0	N	-	-	-	22.0	20.4

Site ID	Site Type	Monitoring Type	Valid Data Capture 2019 (%) <sup>(1)</sup>	Within AQMA?	Annual mean concentration (adjusted for bias) $\mu\text{g}/\text{m}^3$ <sup>(2)</sup>				
					2015 (Bias Adjustment Factor = 0.79)	2016 (Bias Adjustment Factor = 0.78)	2017 (Bias Adjustment Factor = 0.77)	2018 (Bias Adjustment Factor = 0.76)	2019 (Bias Adjustment Factor = 0.75)
195	Roadside	Diffusion Tube	91.7	N	-	-	-	31.6	31.2
196	Roadside	Diffusion Tube	100.0	N	-	-	-	24.9	25.2
197	Roadside	Diffusion Tube	91.7	N	-	-	-	31.0	30.6
198	Roadside	Diffusion Tube	100.0	Y	-	-	-	35.1	33.5
199	Roadside	Diffusion Tube	100.0	N	-	-	-	23.9	25.0
200	Roadside	Diffusion Tube	91.7	N	-	-	-	33.4	31.1
201	Roadside	Diffusion Tube	100.0	N	-	-	-	30.3	28.9
202	Roadside	Diffusion Tube	100.0	N	-	-	-	27.8	27.6
203	Roadside	Diffusion Tube	100.0	N	-	-	-	21.6	20.6
204	Roadside	Diffusion Tube	91.7	N	-	-	-	23.3	22.1
207	Roadside	Diffusion Tube	100.0	N	-	-	-	21.7	20.6
208	Roadside	Diffusion Tube	100.0	N	-	-	-	25.4	24.9

Site ID	Site Type	Monitoring Type	Valid Data Capture 2019 (%) <sup>(1)</sup>	Within AQMA?	Annual mean concentration (adjusted for bias) $\mu\text{g}/\text{m}^3$ <sup>(2)</sup>				
					2015 (Bias Adjustment Factor = 0.79)	2016 (Bias Adjustment Factor = 0.78)	2017 (Bias Adjustment Factor = 0.77)	2018 (Bias Adjustment Factor = 0.76)	2019 (Bias Adjustment Factor = 0.75)
209	Roadside	Diffusion Tube	100.0	N	-	-	-	22.7	22.3
210	Roadside	Diffusion Tube	100.0	N	-	-	-	21.7	20.4
211	Roadside	Diffusion Tube	100.0	N	-	-	-	21.7	21.8
212	Kerbside	Diffusion Tube	83.3	Y	-	-	-	<b>47.1<sup>2</sup></b>	<b>41.3</b>
213	Roadside	Diffusion Tube	100.0	N	-	-	-	-	24.1
214	Roadside	Diffusion Tube	100.0	Y	-	-	-	-	32.3
216	Roadside	Diffusion Tube	83.3	N	-	-	-	-	29.3
217	Roadside	Diffusion Tube	100.0	N	-	-	-	-	17.3
218	Roadside	Diffusion Tube	100.0	Y	-	-	-	-	35.5
219	Kerbside	Diffusion Tube	83.3	N	-	-	-	-	28.3
220	Kerbside	Diffusion Tube	58.3	N	-	-	-	-	38.4 <sup>2</sup>
221	Kerbside	Diffusion Tube	NA	N	-	-	-	-	NA

Site ID	Site Type	Monitoring Type	Valid Data Capture 2019 (%) <sup>(1)</sup>	Within AQMA?	Annual mean concentration (adjusted for bias) $\mu\text{g}/\text{m}^3$ <sup>(2)</sup>				
					2015 (Bias Adjustment Factor = 0.79)	2016 (Bias Adjustment Factor = 0.78)	2017 (Bias Adjustment Factor = 0.77)	2018 (Bias Adjustment Factor = 0.76)	2019 (Bias Adjustment Factor = 0.75)
222	Roadside	Diffusion Tube	41.7	N	-	-	-	-	33.2 <sup>2</sup>
223	Roadside	Diffusion Tube	100.0	N	-	-	-	-	14.9
224	Roadside	Diffusion Tube	66.7	N	-	-	-	-	23.1 <sup>2</sup>
225	Other	Diffusion Tube	100.0	N	-	-	-	16.9	18.0
226	Other	Diffusion Tube	91.7	N	-	-	-	18.5	18.3
227	Other	Diffusion Tube	91.7	N	-	-	-	21.8	21.8
228	Roadside	Diffusion Tube	83.3	N	-	-	-	26.1	26.1
229	Other	Diffusion Tube	83.3	N	-	-	-	18.0	18.5
230	Other	Diffusion Tube	100.0	N	-	-	-	18.2	18.5
231	Other	Diffusion Tube	91.7	N	-	-	-	20.4	20.9
232	Other	Diffusion Tube	83.3	N	-	-	-	19.9	21.8
233	Other	Diffusion Tube	100.0	N	-	-	-	24.5	24.7

Site ID	Site Type	Monitoring Type	Valid Data Capture 2019 (%) <sup>(1)</sup>	Within AQMA?	Annual mean concentration (adjusted for bias) $\mu\text{g}/\text{m}^3$ <sup>(2)</sup>				
					2015 (Bias Adjustment Factor = 0.79)	2016 (Bias Adjustment Factor = 0.78)	2017 (Bias Adjustment Factor = 0.77)	2018 (Bias Adjustment Factor = 0.76)	2019 (Bias Adjustment Factor = 0.75)
234	Other	Diffusion Tube	100.0	N	-	-	-	20.0	21.5
235	Other	Diffusion Tube	75.0	N	-	-	-	21.6 <sup>2</sup>	17.7
236	Other	Diffusion Tube	100.0	N	-	-	-	18.8 <sup>2</sup>	17.9
237	Roadside	Diffusion Tube	91.7	N	-	-	-	21.2	24.1
238	Roadside	Diffusion Tube	83.3	N	-	-	-	17.7 <sup>2</sup>	16.4
239	Other	Diffusion Tube	100.0	N	-	-	-	19.3	18.3
240	Other	Diffusion Tube	91.7	N	-	-	-	18.5 <sup>2</sup>	19.5
241	Roadside	Diffusion Tube	75.0	N	-	-	-	18.3	18.8
242	Roadside	Diffusion Tube	100.0	N	-	-	-	16.4	16.9
NRW SCHOOL MONITORING <sup>4</sup>									
254	Roadside	Diffusion Tube	NA	N	-	-	-	-	31.1
255	Roadside	Diffusion Tube	NA	N	-	-	-	-	18.6
256	Roadside	Diffusion Tube	NA	N	-	-	-	-	11.6

Site ID	Site Type	Monitoring Type	Valid Data Capture 2019 (%) <sup>(1)</sup>	Within AQMA?	Annual mean concentration (adjusted for bias) $\mu\text{g}/\text{m}^3$ <sup>(2)</sup>				
					2015 (Bias Adjustment Factor = 0.79)	2016 (Bias Adjustment Factor = 0.78)	2017 (Bias Adjustment Factor = 0.77)	2018 (Bias Adjustment Factor = 0.76)	2019 (Bias Adjustment Factor = 0.75)
257	Roadside	Diffusion Tube	NA	N	-	-	-	-	11.7
258	Roadside	Diffusion Tube	NA	N	-	-	-	-	12.3
259	Roadside	Diffusion Tube	NA	N	-	-	-	-	11.5
260	Roadside	Diffusion Tube	NA	N	-	-	-	-	17.4
261	Roadside	Diffusion Tube	NA	N	-	-	-	-	18.5
262	Roadside	Diffusion Tube	NA	N	-	-	-	-	13.8
263	Roadside	Diffusion Tube	NA	N	-	-	-	-	14.6
264	Roadside	Diffusion Tube	NA	N	-	-	-	-	16.0

**Notes:**

Exceedances of the NO<sub>2</sub> annual mean objective of 40 $\mu\text{g}/\text{m}^3$  are shown in **bold**.

NO<sub>2</sub> annual means exceeding 60 $\mu\text{g}/\text{m}^3$ , indicating a potential exceedance of the NO<sub>2</sub> 1-hour mean objective are shown in **bold and underlined**.

(1) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

(2) Diffusion tube data has been “bias adjusted” in accordance with Box 7.11 in LAQM.TG16 and “annualised” as per Boxes 7.9 and 7.10 in LAQM.TG16 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

(3) Diffusion tube data has been corrected for distance to represent relevant exposure in accordance with Sections 7.77- 7.79 in LAQM.TG16 “Fall-off in NO<sub>2</sub> concentrations with Distance from the Road”

(4) School Monitoring Programme reported over 12-month period (April 2019- March 2020). Result provided is an average for this period.

**Table 5– Automatic Annual Mean NO<sub>2</sub> Monitoring Results (2015- 2019)**

Site ID	Site Type	Within AQMA?	Valid Data Capture for Monitoring Period % <sup>(1)</sup>	Valid Data Capture 2019 % <sup>(2)</sup>	Annual Mean Concentration (µg/m <sup>3</sup> )				
					2015	2016	2017	2018	2019
Cardiff Centre AURN 1	Urban Background	N	100	62.5	27	23	20	20 <sup>3</sup>	27 <sup>3</sup>
Cardiff Newport Road AURN 2	Roadside/ Urban Traffic	N	100	99	-	-	-	29 <sup>3</sup>	29

Notes:

Exceedances of the Annual Average NO<sub>2</sub> objective (40µg/m<sup>3</sup>) are shown in bold.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

(3) Data has been “annualised” as per Boxes 7.9 in LAQM.TG16 where valid data capture for the full calendar year is less than 75%. See Appendix C for details.

**Table 6– Automatic 1-hour Mean NO<sub>2</sub> Monitoring Results (2015- 2019)**

Site ID	Site Type	Within AQMA?	Valid Data Capture for Monitoring Period % <sup>(1)</sup>	Valid Data Capture 2019 % <sup>(2)</sup>	Number of Hourly Means (> 200µg/m <sup>3</sup> ) <sup>(3)</sup>				
					2015	2016	2017	2018	2019
Cardiff Centre AURN 1	Urban Background	N	100	62.5	0 (14.98)	0	0	0 (84.55)	0 (84)
Cardiff Newport Road AURN 2	Roadside/ Urban Traffic	N	100	99	-	-	-	0 (98.12)	0

Notes:

Exceedances of the NO<sub>2</sub> 1-hour mean objective (200µg/m<sup>3</sup> not to be exceeded more than 18 times/year) are shown in bold.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

(3) If the period of valid data is less than 85%, the 99.8<sup>th</sup> percentile of 1-hour means is provided in brackets.

Figure 31– Trends in Annual Mean NO<sub>2</sub> Concentrations Measured at Cardiff Frederick Street AURN (AURN 1) Site

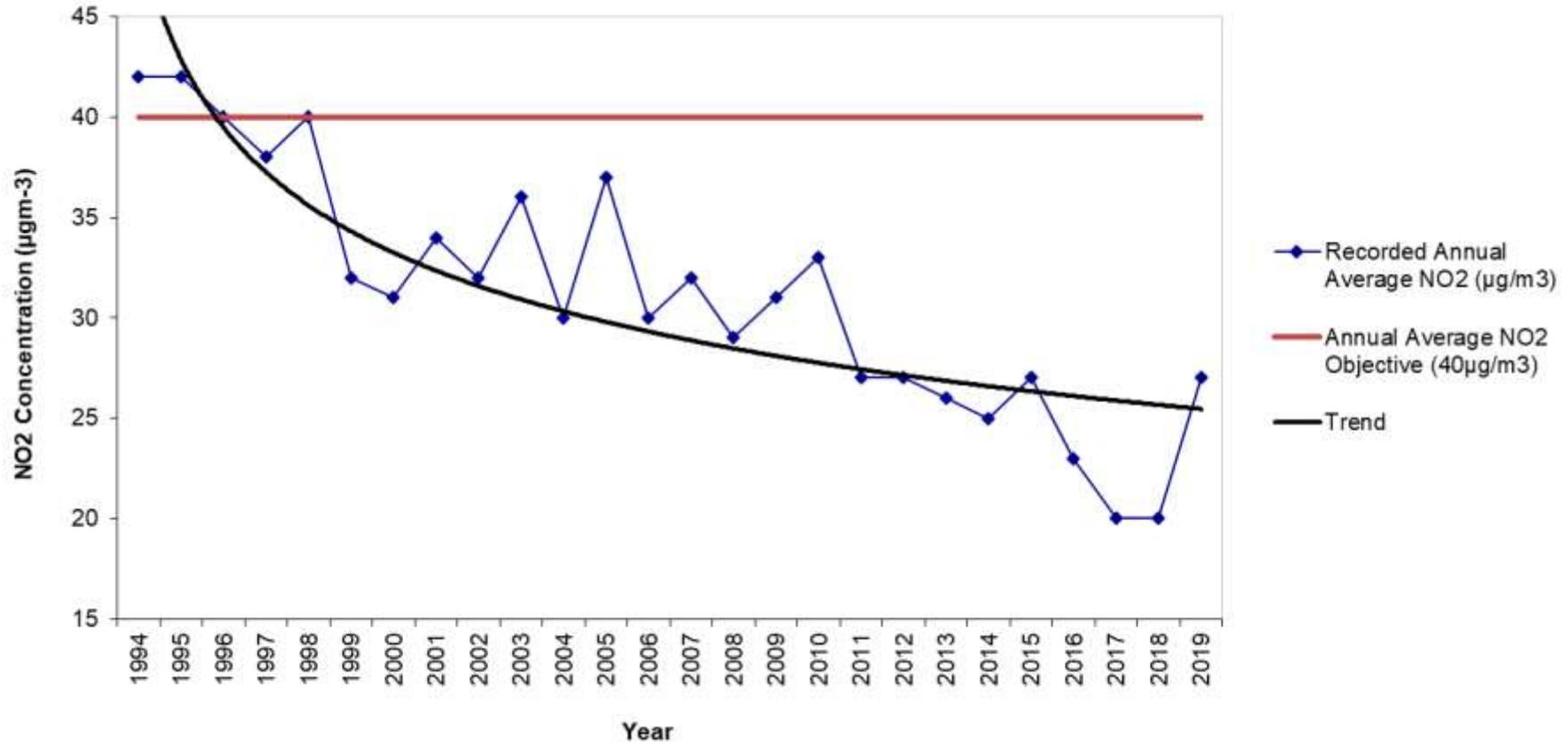


Figure 28 indicates a decreasing trend in annual average NO<sub>2</sub> concentrations in Cardiff’s background levels. However, it is noted that the 2019 figures do show a rise in annual average levels.

**Table 7– Automatic Annual Mean PM<sub>10</sub> Monitoring Results (2015- 2019)**

Site ID	Site Type	Within AQMA?	Valid Data Capture for Monitoring Period (%) <sup>(1)</sup>	Valid Data Capture 2019 (%) <sup>(2)</sup>	Confirm Gravimetric Equivalent (Y or N/A)	PM <sub>10</sub> Annual Mean Concentration (µg/m <sup>3</sup> ) <sup>(3)</sup>				
						2015	2016	2017	2018	2019
Cardiff Centre AURN 1	Urban Background	N	100	67.7	N/A	16	15.1 <sup>(3)</sup>	16	17	22.1 <sup>3</sup>
Cardiff Newport Road AURN 2	Roadside/ Urban Traffic	N	100	96	Y	-	-	-	20.3 <sup>3</sup>	19

**Notes:**

Exceedances of the PM<sub>10</sub> annual mean objective of 40µg/m<sup>3</sup> are shown in bold.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

(3) Data has been “annualised” as per Boxes 7.9 and 7.10 in LAQM.TG16 where valid data capture for the full calendar year is less than 75%. See Appendix C for details.

**Table 8– Automatic 24-Hour Mean PM<sub>10</sub> Monitoring Results (2015- 2019)**

Site ID	Site Type	Within AQMA?	Valid Data Capture for Monitoring Period (%) <sup>(1)</sup>	Valid Data Capture 2019 (%) <sup>(2)</sup>	Confirm Gravimetric Equivalent (Y or N/A)	Number of Daily Means > 50µg/m <sup>3</sup> <sup>(3)</sup>				
						2015	2016	2017	2018	2019
Cardiff Centre AURN 1	Urban Background	N	100	67.7	N/A	5 (25.4)	1 (30.52)	2	0	0 (44)
Cardiff Newport Road AURN 2	Roadside/ Urban Traffic	N	100	96	Y	-	-	-	0 (36)	12

**Notes:**

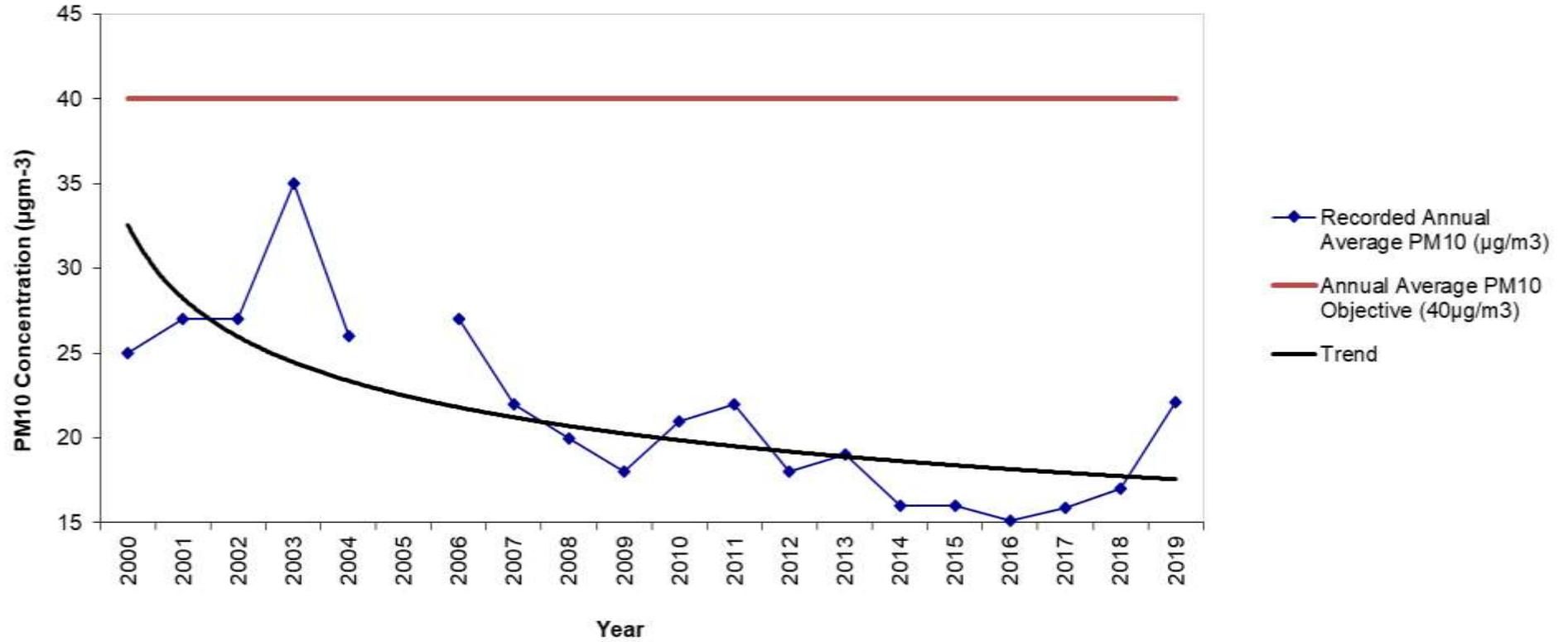
Exceedances of the PM<sub>10</sub> 24-hour mean objective (50µg/m<sup>3</sup> not to be exceeded more than 35 times/year) are shown in **bold**.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

(3) If the period of valid data is less than 85%, the 90.4<sup>th</sup> percentile of 24-hour means is provided in brackets.

**Figure 32- Trends in Annual Mean PM<sub>10</sub> Concentrations Measured at Cardiff Frederick Street AURN (AURN 1) Site** The displayed datasets indicate a downward trend in Cardiff's background PM<sub>10</sub> levels.



**Table 9– Automatic SO<sub>2</sub> Monitoring Results: Comparison with Objectives**

Site ID	Site Type	Within AQMA?	Valid Data Capture for Monitoring Period (%) <sup>(1)</sup>	Valid Data Capture 2019 (%) <sup>(2)</sup>	Number of Exceedences (percentile in bracket µg/m <sup>3</sup> )		
					15-minute Objective (266 µg/m <sup>3</sup> )	1-hour Objective (350 µg/m <sup>3</sup> )	24-hour Objective (125 µg/m <sup>3</sup> )
Cardiff Centre AURN 1	Urban Background	N	100	65	0	0	0

**Notes:**

Exceedences of the SO<sub>2</sub> mean objectives are shown in **bold**.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

(3) In accordance with LAQM TG(16), due to the fact data capture is <85% it is a requirement to report the 99.9<sup>th</sup> percentile for 15 minute SO<sub>2</sub>, however in this instance it is the 99.9<sup>th</sup> percentile for 10 minute SO<sub>2</sub>.

(4) In accordance with LAQM TG(16), due to the fact data capture is <85% it is a requirement to report the 99.7<sup>th</sup> percentile for 1 hour SO<sub>2</sub>

(5) In accordance with LAQM TG(16), due to the fact data capture is <85% it is a requirement to report the 99.2<sup>nd</sup> percentile for 24 hour SO<sub>2</sub>

**Table 10– Automatic Carbon Monoxide (CO) Monitoring Results: Comparison with Objectives**

Site ID	Site Type	Within AQMA?	Valid Data Capture for Monitoring Period (%) <sup>(1)</sup>	Valid Data Capture 2019 (%) <sup>(2)</sup>	Number of Exceedences
					8-Hour Average Objective (10 µg/m <sup>3</sup> )
Cardiff Centre AURN 1	Urban Background	N	100	72	0

**Table 11– Automatic Ozone (O3) Monitoring Results: Comparison with Objectives**

Site ID	Site Type	Within AQMA?	Valid Data Capture for Monitoring Period (%) <sup>(1)</sup>	Valid Data Capture 2019 (%) <sup>(2)</sup>	Number of Exceedences
					Number of days where the 8-hour mean >100µg/m <sup>3</sup>
Cardiff Centre AURN 1	Urban Background	N	100	99	5

## 2.3 Comparison of 2019 Monitoring Results with Previous Years and the Air Quality Objectives

During 2019 monitoring was carried out for nitrogen dioxide (NO<sub>2</sub>), particulate matter (PM<sub>10</sub>), sulphur dioxide (SO<sub>2</sub>), carbon monoxide (CO) and ozone (O<sub>3</sub>). There was no monitoring undertaken for benzene or 1-3-butadiene in line with the requirements of the LAQM regime in Wales.

### 2.3.1 Nitrogen Dioxide (NO<sub>2</sub>)

Nitrogen dioxide was measured during 2019 at two sites equipped with an automatic NO<sub>x</sub> analyser and by a network of 100 passive diffusion tubes.

In order to ratify the 2019 diffusion tube dataset, a bias adjustment factor of 0.75 was applied to the annual average readings. The factor was derived from the Defra website which gave the average correction factor from 42 co-location studies across the UK, whereby the analytical laboratory and method used was the same as CC. The national bias correction factor was utilized as it would provide results representative of a worst-case scenario. The bias correction factor of 0.75 was obtained from the following website: <http://laqm.defra.gov.uk/bias-adjustment-factors/national-bias.html>

#### Automatic Monitoring Data

NO<sub>2</sub> datasets obtained from the two automatic monitoring sites outlined as (AURN 1 & AURN 2) have been cross referenced to the annual and 1-hour average objectives set for NO<sub>2</sub>. The findings summarised in Table 5 & Table 6 indicate compliance with both objectives.

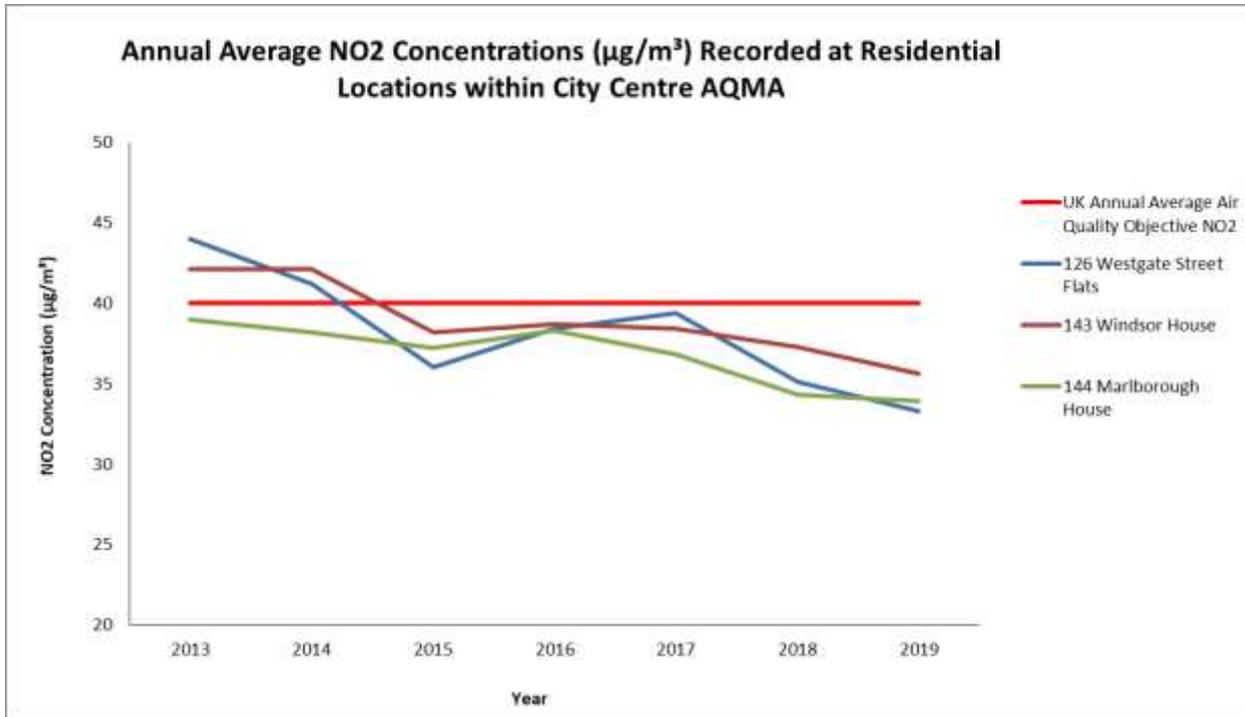
#### Non- automated Monitoring Data

The nitrogen dioxide diffusion tube data is summarised in Table 4. The full dataset (raw monthly mean values) is included in Appendix A. All data displayed in Table 4 has been bias adjusted, where necessary annualised in accordance with Box 7.10 of LAQM (TG16) and distance corrected to represent exposure at the nearest sensitive receptor. Evidence of the sites annualised can be seen in Appendix C. The applied bias adjustment factor was 0.75, as described in Appendix C.

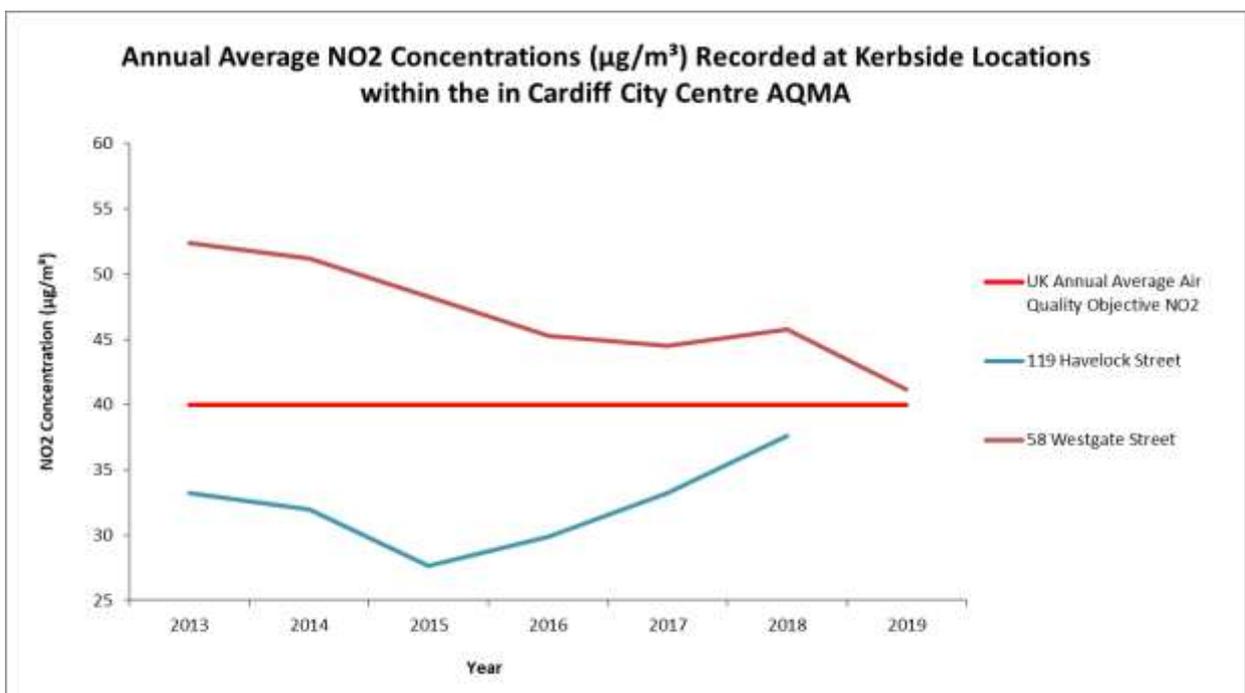
**Table 4** shows that 6 of the 100 passive diffusion tube locations recorded a concentration of NO<sub>2</sub> above the 40µg/m<sup>3</sup> annual mean objective set for NO<sub>2</sub> in 2019. All 6 exceedences were documented within the already established City Centre and Llandaff air quality management areas (AQMA).

**Air quality dataset trends within Cardiff's AQMAs**

**Figure 33- Trends in Annual Average NO<sub>2</sub> Concentrations Recorded at Façade Locations in City Centre AQMA**



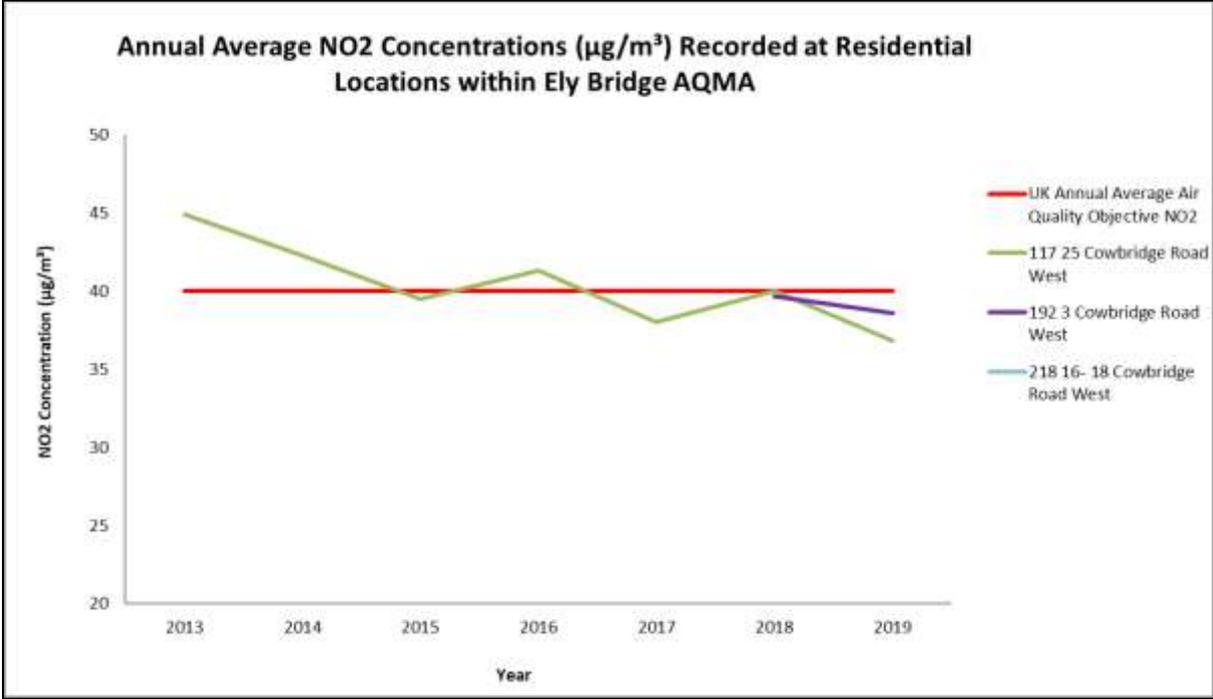
**Figure 34- Trends in Annual Average NO<sub>2</sub> Concentrations Recorded at Kerbside Locations in Cardiff City Centre AQMA**



Examining **Table 4** it is apparent that annual average NO<sub>2</sub> datasets in the City Centre, in and around the AQMA, continue to be elevated in 2019. Despite the elevated figures it is encouraging that the

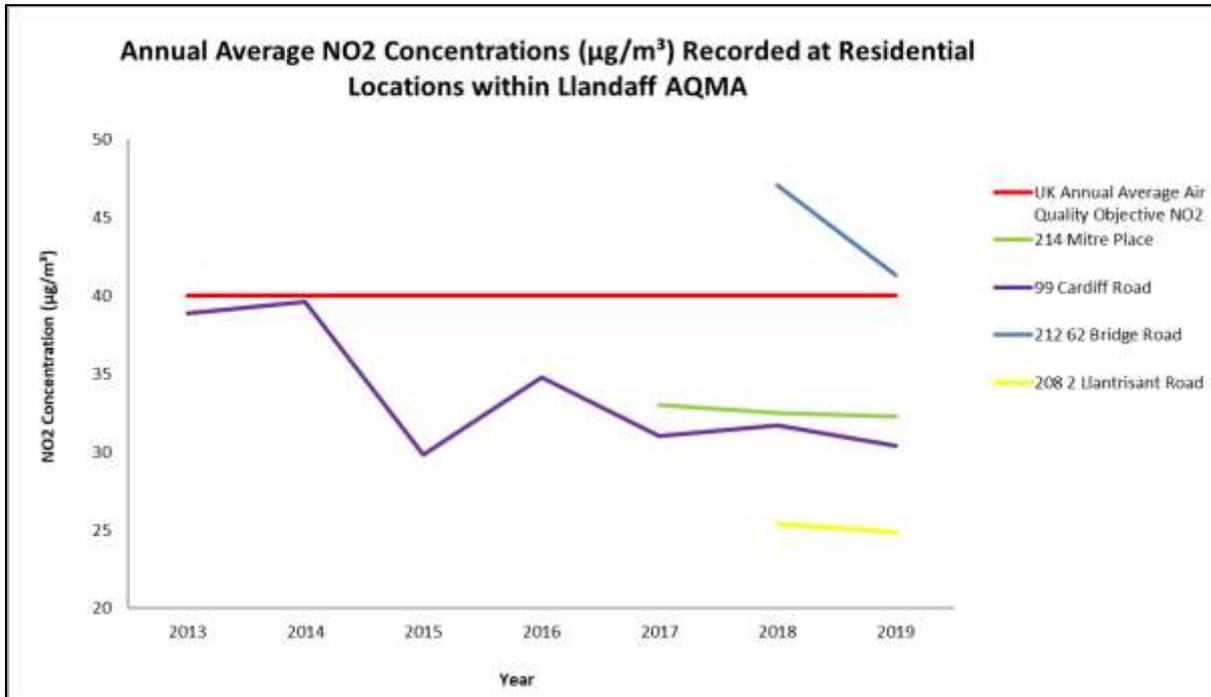
graphed figures all evidence a reduction in annual average levels. However, based on figures in recent years, as outlined by Table 4; City Centre AQMA monitoring locations, specifically sites 186 & 187 located on Castle Street depict levels not only in breach of the annual average objective, but have been shown to record levels encroaching upon the 1-hour NO<sub>2</sub> objective with results close to 60µg/m<sup>3</sup>. To note, sites 186 & 187 are of a commercial nature and therefore the 1-hour objective applies at these locations.

**Figure 35- Trends in Annual Average NO<sub>2</sub> Concentrations Recorded at Façade Locations in Ely Bridge AQMA**



As depicted by Figure 35; monitoring undertaken in 2019 within the Ely Bridge AQMA evidences elevated annual average levels of NO<sub>2</sub> for all residential façade monitored locations.

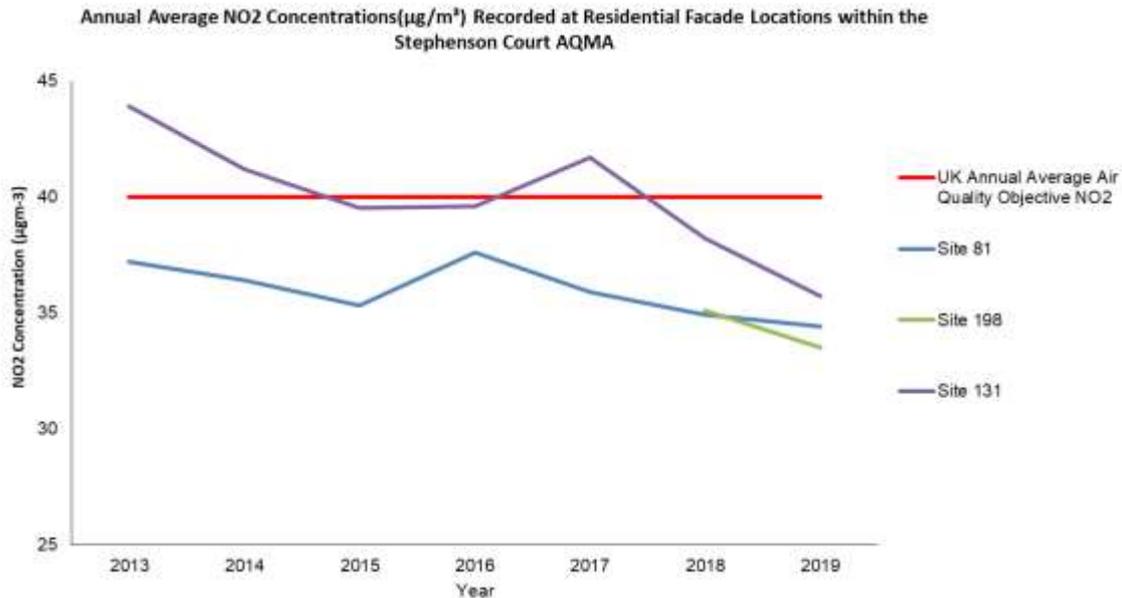
**Figure 36- Trends in Annual Average NO<sub>2</sub> Concentrations Recorded at Façade Locations in Llandaff AQMA**



Residential monitoring locations within the Llandaff AQMA, in general indicate compliance with the annual average objective. Site 212 does indicate an exceedance of the annual average objective, however an improvement is noted with an evidenced reduction in overall levels from 2018.

In an effort to reassure local residents, as referenced in the 2018 APR, officers have explored the idea of improving monitoring capabilities in the Llandaff AQMA by investing in an automated monitoring system. SRS who had successfully accrued funding via a S106 planning contribution, purchased a near real-time indicative air quality monitor (AQ Mesh analyser) which has been installed within the Llandaff AQMA boundary.

**Figure 37- Trends in Annual Average NO<sub>2</sub> Concentrations Recorded at Residential Façade Locations within the Stephenson Court AQMA.**



All three monitoring sites within the Stephenson Court AQMA (Sites, 81, 131 & 198) show compliance with the annual average objective, however results remain elevated, particularly at Site 131 (>35µg/m<sup>3</sup>), and thus the AQMA will be maintained.

In accordance with LAQM best practise guidance; there are no monitoring sites in the district with annual average concentrations above 60µg/m<sup>3</sup> in 2019. Therefore this indicates it is unlikely that the hourly nitrogen dioxide objective was exceeded.

### 2.3.2 Particulate Matter (PM<sub>10</sub>)

As described in previous sections, monitoring of PM<sub>10</sub> has been carried out at the Cardiff Centre and Newport Road AURN monitoring sites (AURN 1 & 2) and the summary data is given in **Tables 7 and 8**.

The results of the monitoring indicate that recorded PM<sub>10</sub> concentrations at the Cardiff City Centre and Newport Road AURN monitoring stations are compliant with both the annual mean (40µg/m<sup>3</sup>) and 24-hour mean (>50 µg/m<sup>3</sup> not to be exceeded more than 18 times per year) AQS objectives set for PM<sub>10</sub>.

### 2.3.3 Sulphur Dioxide (SO<sub>2</sub>)

Sulphur dioxide was measured at the Cardiff Centre AURN automatic monitoring site during 2019. The site is classified as “Urban Background” and is a relevant location for the 15-minute and 1-hour Objectives. Data for the monitoring is given in Table 9.

There were no exceedences of the set objectives during 2019.

### 2.3.4 Benzene

No monitoring of Benzene was undertaken by SRS on behalf of Cardiff Council in 2019.

### 2.3.5 Other Pollutants Measured

During 2019 monitoring for ozone and carbon monoxide was carried out in Cardiff. Details are in the following sections;

#### Carbon Monoxide

Carbon monoxide was monitored at Cardiff's City Centre AURN site during 2019.

Data capture at for the whole year at Cardiff's City Centre AURN site was 72%. There were no exceedences of the objective. **Table 10** summarises the findings.

There continues to be no risk of the National Air Quality Standard being exceeded.

#### Ozone

Cardiff Council monitors Ozone due to its potential correlations with other pollutants. In 2019, ozone was measured at the Cardiff City Centre, Frederick Street AURN site. Although Ozone is not included in the Local Air Quality Management system, the results are included in **Table 11** for completeness.

The results are compared with the running 8-hour mean objective as set by the Expert Panel on Air Quality Standards (EPAQs) which states the running 8-hour mean should not exceed 100µg/m<sup>3</sup> on more than 10 days per year. There were 5 exceedences of the ozone objective in Cardiff in 2019.

## **2.4 Summary of Compliance with AQS Objectives as of 2019**

Shared Regulatory Services have reviewed the results from the monitoring undertaken across the Cardiff in 2019.

The datasets indicate that the annual average objective for NO<sub>2</sub> was not breached at any monitoring locations outside of the existing AQMAs.

## 3. New Local Developments

### 3.1 Road Traffic Sources (& other transport)

SRS on behalf of Cardiff Council continue to work and engage with the Transport and Highways team in Cardiff Council, consulting upon any road network proposals that has the potential to influence local air quality levels.

#### 3.1.1 Narrow Congested Streets with Residential Properties Close to the Kerb

Cardiff Council has considered road traffic sources extensively in both this and each year in earlier reports; the monitoring network is very largely focused on measuring concentrations of nitrogen dioxide close to many of them. These have been discussed either in previous reports or earlier in this report.

There are no newly identified road traffic sources which need to be considered.

For 2019 SRS on behalf of Cardiff Council confirms that there are no new/newly identified congested streets with a flow above 5,000 vehicles per day and residential properties close to the kerb, that have not been adequately considered in previous rounds of Review and Assessment.

#### 3.1.2 Busy Streets Where People May Spend 1-hour or More Close to Traffic

Datasets collected from improved monitoring locations along Kingsway/ Duke Street/ Castle Street Link area have been compared to the 1-hour objective set for NO<sub>2</sub> due to the fact each site is known for commercial use at ground floor level. Levels are shown to be compliant with the objective.

There are no new locations identified since the Council's 2019 Progress Report was submitted and there is no need to consider this further at this time.

SRS on behalf of Cardiff Council confirms that there are no new/newly identified busy streets where people may spend 1 hour or more close to traffic.

#### 3.1.3 Roads with a High Flow of Buses and/or HGVs.

Other than Westgate Street, there are no roads in Cardiff where buses, coaches and HDVs account for >20% of road traffic, where flow of these vehicles is >2500 and there is relevant exposure within 10m of the kerb.

SRS on behalf of Cardiff Council confirms that there are no new/newly identified roads with high flows of buses/HDVs.

#### 3.1.4 Junctions

Junctions have been fully considered in previous annual reviews and assessments.

SRS on behalf of Cardiff Council can confirm that there are no new/newly identified busy junctions/busy roads where exceedences of either the nitrogen dioxide or PM<sub>10</sub> objectives are likely.

### 3.1.5 New Roads Constructed or Proposed Since the Last Round of Review and Assessment

In July 2017 Cardiff saw the completion of the Eastern Bay Link Road which extends the A4232.

### 3.1.6 Roads with Significantly Changed Traffic Flows

Ratified traffic data has been examined and there are no roads in Cardiff which have experienced traffic flow (AADT) growth of 25% or more in the preceding three years.

There is increasing evidence from the traffic measurements both locally and regionally to suggest that, for economic and other reasons, traffic growth on major routes has stopped year-on-year and may even have declined recently. This has, for example, resulted in a number of air quality assessments submitted with planning applications assuming current levels of road traffic as a worst-case scenario.

It should be noted that Cardiff Council is actively implementing its traffic management policy of a 50:50 modal split, i.e. 50% of journeys being made other than by the private car. This is not just for new developments but also for the local road network as a whole.

The Council is currently considering planning applications for significant housing and mixed used developments at a number of “strategic sites” across the city.

SRS on behalf of Cardiff Council can confirm that there are no new/newly identified roads with significantly changed traffic flows.

### 3.1.7 Bus and Coach Stations

The 2017 APR outlined planning application (16/02731/MJR). The planning application was subject to approval following the fulfillment of a number planning conditions that accompanied the application with regards to air quality. However, the application was amended and therefore resubmitted as a new application (18/01705/MJR). Cardiff Council awarded planning consent for the proposal, subject to approval and discharge of Conditions attached to the application. In accordance with comments made by responsible officers in relation to air quality matters appropriate Conditions have been set and S106 contributions to enhance monitoring capabilities agreed.

A planning proposal was received in 2018 for the construction of a new sustainable transport hub at the University Hospital of Wales Concourse, Heath (planning application 18/01769/MJR). The application has been granted consent subject to approval and discharge of planning conditions. The supporting air quality assessment examined projected NO<sub>2</sub> & PM<sub>10</sub> levels in accordance with the short term objectives set for these pollutants; **1- hour mean objective for NO<sub>2</sub> (200µg/m<sup>3</sup> not to be exceeded more than 18 times a year)** and **24- hour mean objective for PM<sub>10</sub> (50µg/m<sup>3</sup> not to be exceeded more than 35 times a year)**. The assessment concluded that the operational air quality impact of the proposed development will not be significant.

### 3.1.8 Airports

There are no airports in Cardiff. The nearest airport is Cardiff International which is located approximately 15 miles to the west of Cardiff in The Vale of Glamorgan Council's area.

There are no airports planned or proposed within the Council's area and nowhere to put one.

SRS on behalf of Cardiff Council confirms that there are no airports in the Local Authority area.

### 3.1.9 Railways (Diesel and Steam Trains)

Cardiff is well-served by passenger rail transport. The main Swansea to London Paddington line is served by Cardiff Central Station. Additionally, there is a network of local-line services running, in the main, to the valleys north of Cardiff.

LAQM.TG(16) suggests that SO<sub>2</sub> emissions from diesel locomotives may be significant if there are outdoor locations where locomotives are regularly stationary for more than 15 minutes and where members of the public could be regularly exposed over this period at such locations.

LAQM.TG(16) also requires consideration exposure to nitrogen dioxide within 30m of certain specified railway lines in those areas where the annual mean background concentration is above 25µg m<sup>-3</sup>.

#### Stationary Trains

Stationary trains have been considered fully in earlier reports with regard to potential exceedences of the sulphur dioxide objective. No potential exceedences were found and nothing has changed in this regard since then. There is no need to further assess this source.

It should be recorded that works are now underway in preparation for the electrification of the main Swansea/Cardiff to London Paddington line. The effects of this on local emissions can be only beneficial.

Discussions with regard to the electrification of the local line network are ongoing.

SRS on behalf of Cardiff Council confirms that there are no locations where diesel or steam trains are regularly stationary for periods of 15 minutes or more, with potential for relevant exposure within 15m.

#### Moving Trains

LAQM.TG(09) introduced a new requirement to assess the potential for exceedence of nitrogen dioxide objectives. The assessment criteria are in relation to large numbers of diesel locomotive movements where there is relevant exposure within 30 metres of the track in areas where the background annual mean concentration of nitrogen dioxide is above 25µm<sup>-3</sup>.

This assessment was carried out for the 2009 USA and nothing has changed in the intervening period. There is no need to further assess this source.

It should be recorded that works are now underway in preparation for the electrification of the main Swansea/Cardiff to London Paddington line. The effects of this on local emissions can be only beneficial.

Discussions with regard to the electrification of the local line network are ongoing.

SRS on behalf of Cardiff Council confirms that there are no locations with a large number of movements of diesel locomotives, and potential long-term relevant exposure within 30m.

### **3.1.10 Ports (Shipping)**

The 2012 USA reported:

“Cardiff docks are not a ferry terminal, there is no Ro-Ro usage and no cruise liners use the port. There is some container traffic using the port and the docks handle bulk cargoes such as sand and grain. Coal-handling operations ceased some years ago.”

In accordance with LAQM.TG(16) guidance threshold of 5000 movements per annum, with relevant exposure within 250m of the berths and main areas or 15,000 large ship movements per annum, with relevant exposure within 1km of these areas is not close to being approached and the risk of exceedance of the SO<sub>2</sub> objectives is considered very small.

Nothing has changed in this regard since the last 2015 USA report that time and there is no need to consider this source further.

SRS on behalf of Cardiff Council confirms that there are no ports or shipping that meet the specified criteria within the Local Authority area.

## 3.2 Industrial / Fugitive or Uncontrolled Sources / Commercial Sources

### 3.2.1 New or Proposed Installations for which an Air Quality Assessment has been Carried Out

As outlined in the 2018 APR; in September 2017, Cardiff Council received a planning proposal (referenced application (17/02130/MJR)) for the construction and operation of a 9.5MW biomass power plant, situated on land at Rover Way, Pengam, Cardiff. Air quality assessments and supporting technical notes have been compiled by certified appointed consultants in support of the application, to which it is concluded that potential impacts associated with the scheme are not significant. It is understood that the planning application for the biomass power plant is only at outline stage and as such detailed design and specification for the plant is yet to be undertaken. The planning application has been granted consent in June 2018 subject to approval for a number of applied conditions, including air quality specific conditions;

#### **Condition**

#### **AIR QUALITY ASSESSMENT**

Prior to the approval of any reserved matters application for the Biomass Power Plant an Air Quality Assessment (AQA) for the detailed design of the Biomass Plant shall be submitted to and approved in writing by the Local Planning Authority. The AQA shall include an assessment of the impact of the plant emissions and any necessary mitigation measures to ensure the overall impacts of the plant are acceptable. The plant shall be constructed in accordance with the approved details and maintained thereafter.

Reason: To ensure air quality is maintained to satisfactory levels and to avoid any adverse effect upon the integrity of the Severn Estuary European Sites and the Severn Estuary SSSI.

In 2019, Cardiff Council received a planning proposal (referenced application (19/01918/MJR)) for the installation of an asphalt batching plant, along with associated infrastructure and works, situated on land south of Rover Way, Pengam, Cardiff. The proposal was granted planning consent in 2019. Supporting air quality assessments were undertaken to examine expected air quality impacts for the proposed year of opening (2023). The air quality assessments took consideration of the combined effects of both the traffic generated by the project and of the asphalt plant's combustion process. The report indicates that detailed air dispersion modelling has been used for both traffic and combustion process assessment. With respect to traffic a worst-case scenario is used that presumes 100% of the traffic generated will use Rover Way. The assessment indicates that the combined process contributions of the project would not exceed 1% of the respective Critical Level/Load of NO<sub>x</sub> and Nitrogen deposition for the Salt Meadow vegetation. The cumulative AQ assessment of the project, that considers this project in-combination with traffic from other committed projects and traffic from allocations within the LDP, includes a number of worst-case assumptions, including 100% of traffic from this project and other committed projects using Rover Way. The report indicates that the predicted cumulative NO<sub>x</sub> process contribution will exceed 1% of the 30 ug/m<sup>2</sup> NO<sub>x</sub> Critical Level over parts of the Salt Meadow.

As confirmed by NRW "The HRA document indicates that the contribution of the proposed development to the nutrient loading impacts on the salt-meadow is considered very difficult to quantify, and therefore uncertain, representing in effect a very small increase in nutrient input that may result in reduced species diversity over time. In visiting the site we have taken the opportunity to consider the current condition of the Salt Meadow vegetation at this location, in the light of the

current background NO<sub>x</sub> and Nitrogen deposition levels, and to consider the potential for vegetation change minded of the scale of the predicted process contributions. Having considered both aspects we are satisfied that the scale and nature of any change would not be sufficient to undermine the Conservation Objectives for the Severn Estuary SAC Salt Meadow feature and would not have an adverse effect on the integrity of the Severn Estuary SAC. We therefore have no objection to the planning application on this basis.”

In terms of neighbouring authorities and any major proposed industrial installations, as previously declared in the 2017 APR; on the 31<sup>st</sup> July 2015 the Vale Council approved planning permission for the construction and operation of a biomass gasification facility at Woodham Road, Barry, CF63 4JE (Grid Reference ST 12610 67683). It was noted in the 2017 APR that Natural Resources Wales (NRW) were going through a second round of consultation in regards to a permit application for the proposed operation, submitted by Biomass UK NO<sub>2</sub> Ltd. This second round of consultation was formed as a result of a Section 5 amendment direction sanctioned by NRW; “NRW Schedule 5 notice re Biomass requesting more information” dated 4 May 2017. As part of the amendment a revised air quality assessment (AQA) was submitted in July 2017. Following much dialogue involving comments passed by SRS on behalf of VoGC, NRW granted approval for the sites permit application in February 2018.

### **3.2.2 Existing Installations where Emissions have Increased Substantially or New Relevant Exposure has been introduced**

In the 2017 APR it was outlined that a decision was sought after in regards to the modification of a S106 agreement that accompanies the Viridor Waste Management Facility in Trident Industrial Park, Splott. In July 2017 it was agreed that the S106 be modified and therefore the removal of the obligation that waste may only be acquired from the South East Wales Region.

SRS on behalf of Cardiff Council can confirm there are no industrial installations with substantially increased emissions or new relevant exposure in their vicinity within its area or nearby in a neighbouring authority.

### **3.2.3 New or Significantly Changed Installations with No Previous Air Quality Assessment**

There are no new or significantly changed industrial installations for which previous air quality assessments have not been carried out and which could give rise to potentially significant emissions of regulated pollutants either within Cardiff or within neighbouring local authorities.

SRS on behalf of Cardiff Council can confirm that there are new or proposed industrial installations for which planning approval has been granted within its area or nearby in a neighbouring authority.

### **3.2.4 Major Fuel (Petrol) Storage Depots**

As reported in the 2012 USA, there is one major fuel (petrol) storage depot in Cardiff. This is the Chevron Terminal located in Cardiff Docks which was assessed in previous reports. This installation is subject to an EPR Permit and regulated by the Council. Capacity and throughput at this site has not altered significantly for the worse since the last assessment and no new relevant exposure exists.

SRS on behalf of Cardiff Council can confirm that there are major fuel (petrol) storage depots within the Local Authority area, but these have been considered in previous reports.

### **3.2.5 Petrol Stations**

There are no new petrol stations in Cardiff with throughputs greater than 2000m<sup>3</sup> per annum with a busy road nearby where there is relevant exposure within 10m of the pumps.

It is not necessary, therefore, to consider this further.

SRS on behalf of Cardiff Council can confirm that there are no petrol stations meeting the specified criteria.

### **3.2.6 Poultry Farms**

The criteria for assessing poultry farms are set out in Table 7.3, point 4 of TG(16) (Defra, 2016). No farms exceeding the relevant criteria (turkey units with greater than 100,000 birds, naturally ventilated units with greater than 200,000 birds or mechanically ventilated units with greater than 400,000) have been identified.

SRS on behalf of Cardiff Council can confirm that there are no poultry farms meeting the specified criteria.

## **3.3 Commercial and Domestic Sources**

### **3.3.1 Biomass Combustion – Individual Installations**

As highlighted in Section 3.2.1 planning consent, subject to the approval of conditions attached has been granted for a 9.5MW biomass power plant on land at Rover Way, Pengam, Cardiff.

### **3.3.2 Biomass Combustion – Combined Impacts**

Previous reports have confirmed that there are no known areas in Cardiff where coal or solid fuel burning provides a significant level or primary household heating. Nothing has changed in this regard since the 2018 APR, despite the potential for increasing popularity of solid fuel heating with increased fossil-fuel prices, and there is no need to consider this further at this time.

SRS on behalf of Cardiff Council can confirm that there are no biomass combustion plants in the Local Authority area.

### **3.3.3 Other Sources**

### **3.3.4 Domestic Solid-Fuel Burning**

Previous reports have confirmed that there are no known areas in Cardiff where coal or solid fuel burning provides a significant level or primary household heating. Nothing has changed in this regard since the 2018 APR, despite the potential for increasing popularity of solid fuel heating with increased fossil-fuel prices, and there is no need to consider this further at this time.

It should be noted that the Council receives a number of enquiries each year from residents in respect of national or local requirements were they to wish to install log-burners or similar appliances in their homes. There are no smoke control area in Cardiff and hence no legal requirements with regard to appliances that may be installed. However, residents are always reminded of the legislation in respect of statutory smoke nuisance and, where they can't be

persuaded otherwise for reasons of air quality and health, recommended to seek out an appliance certified for use in a smoke control area.

SRS on behalf of Cardiff Council can confirm that there are no areas of significant domestic fuel use in the Local Authority area.

### 3.4 New Developments with Fugitive or Uncontrolled Sources

There are no new locations where fugitive could occur which have not been covered by previous rounds of review and assessment and no locations where new relevant exposure has been introduced to existing locations.

It is not considered necessary to consider this further at this time.

SRS on behalf of Cardiff Council can confirm that there are no potential sources of fugitive particulate matter emissions in the Local Authority area.

### 3.5 Planning Applications

The Council continues to monitor the impact of proposed developments and recent developments already underway or in use.

The following developments may either be of significance in respect of local air quality or be a proposed development where air quality is a consideration.

#### 3.5.1 LDP Strategic Sites North West

Since the LDP was adopted, numerous outline planning permissions have been granted in respect of Strategic Sites C and D in the North West of Cardiff. The outline applications submitted in respect of Strategic Site C comprise:

##### **14/02188/MJR – Land South of Pentrebane Rd – approved 13/12/16**

*Up to 290 residential dwellings (C3), open space (including childrens play space), landscaping, sustainable urban drainage, vehicular access, pedestrian and cycle accesses and related infrastructure and engineering works.*

##### **14/02157/MJR – Land North and South of Llantrisant Rd – outline application approved 09/08/2016**

*The development of up to 630 residential dwellings (use class c3, including affordable homes), primary school (use class d1), visitor centre/community centre (use class d1), community centre (use class d1), open space (including children's play spaces), landscaping, sustainable urban drainage, vehicular accesses, bus lanes, pedestrian and cycle accesses and related infrastructure and engineering works.*

##### **14/02733/MJR – North West Cardiff – approved 20/03/2017**

*Outline planning application with all matters reserved apart from strategic access junctions for residential-led mixed use development, to be developed in phases, including preparatory works as necessary including demolition and re-grading of site levels; up to 5,970 residential units (use class c3, including affordable homes); 3 no. Local centres providing residential*

*units, convenience shops and facilities/services (including up to 7,900 sq m in use classes a1-a3) and 1no. District centre providing residential units, up to 12,000 sq m in use classes a1-a3 including up to two food stores (up to 5,000 sq m gross) with associated parking, up to 15,500 sq m of use class b1(a), b1(b) and b1(c); provision of up to 5,100 sq m of community and healthcare facilities across the district and local centres (use classes d1 and d2); provision for 3no. Primary schools and 1no. Secondary school; open space including allotments; parks; natural and semi natural green space; amenity green spaces; facilities for children and young people; outdoor sports provision including playing pitches; associated infrastructure and engineering works including new vehicular accesses, improvement works to the existing highway network, new roads, footpaths/cycleways, a reserved strategic transport corridor; up to 1 no. Electricity primary-substation and landscaping works (including suds).*

**16/00106/MJR – Goitre Fach Farm, Llantrisant Rd – approved 27/04/17**

*Outline planning application (all matters reserved apart from strategic vehicular, cycle and pedestrian access into the site) for the demolition of existing buildings and residential development of up to 300 dwellings on site to include open space (including children's play space), landscaping. Sustainable urban drainage, vehicular access, pedestrian and cycle accesses and related infrastructure and engineering works.*

A single outline application has been submitted in respect of Strategic Site D (below), and none to date in respect of Strategic Site E.

**14/00852/DCO – Land to the North of M4 Junction 33 – approved 07/09/2017**

*Comprehensive development of 'Land to the North of Junction 33 of the m4' to create a new community containing: A range of new homes, including houses, apartments and some sheltered accommodation for the elderly (Use Classes C2 and C3), a park and ride facility and transport interchange or hub, community facilities including a new primary school and community centre (Use Class D1), a local centre including shops (Use Class A1), financial and professional (Use Class A2), food and drink (Use Class A3) and a clinic or surgery (Use Class D1), new offices, workshops and research and development facilities (Use Classes B1 with ancillary B2 and B8), a network of open spaces including parkland, footpaths, sports pitches and areas for informal recreation, new roads, parking areas, accesses and paths, other ancillary uses and activities, and requiring; site preparation, the installation or improvement of services and infrastructure; the creation of drainage channels; improvements/ works to the highway network and other ancillary works and activities.*

The impact of the above proposals on the environment has been fully considered in the determination of each of the above applications and subsequent related applications. The LDP has two key policies to ensure that the impacts on air quality from developments do not impede on public health or the environment, and these are;

**KP18 deals with Natural Resources:**

*“In the interests of the long-term sustainable development of Cardiff, development proposals must take full account of the need to minimise impacts on the city’s natural resources and minimise pollution, in particular the following elements:...(iii). Minimising air pollution from industrial, domestic and road transportation sources and managing air quality;”*

**EN13, which addresses air, noise, light pollution and contaminated land:**

*“Development will not be permitted where it would cause or result in unacceptable harm to health, local amenity, the character and quality of the countryside, or interests of nature conservation, landscape or built heritage importance because of air, noise, light pollution or the presence of unacceptable levels of land contamination.”*

To comply with the referenced policies, appropriate air quality assessments have been undertaken and submitted as part of the planning applications for the proposed developments. The submitted air quality assessments have been undertaken in line with best practise guidance and consider future air quality levels for the established Llandaff AQMA.

The air quality assessments have captured various scenarios using air quality dispersion modelling software. The impacts of the proposed development and other strategic developments in Cardiff's Local Plan has been assessed alone and in combination in a series of sensitivity tests utilising dispersion modelling software. The assessments indicate that the impact to the Llandaff AQMA will be insignificant when considering both the individual LDP developments and the cumulative impact of the developments.

An Environmental Statement was submitted as part of each outline application mentioned above and provided a comprehensive assessment of the potential impacts of the proposed development, which covered the following topics: Socio Economic, Transportation, Water Resources, Ecology, Landscape & Visual, Noise & Vibration, Air Quality, Heritage, Agriculture and Soils, and Cumulative & Residual effects. Each ES considered both the traffic and air quality impact of the developments, including the impact on the Llandaff Air Quality Management Area during both the construction and operational phases, which was carefully considered in the assessment of the applications.

The Planning Committee report for each outline application summarises the development proposals, the responses of consultee and third party responses, provides an analysis of the impact of the developments – including traffic and air quality impacts, and sets out the planning obligations and conditions considered necessary to manage their impacts and allow the proposals to come forward for development. Furthermore, the applications were approved subject to extensive mitigation in the form of detailed highway improvement works, a suite of transport conditions (encompassing detailed highway improvement works, car and cycle parking, street cross sections, travel plans, traffic monitoring, phasing, construction environmental management plans) and a package of s106 contributions for off-site highway improvement measures. The improvement measures will be phased to support the implementation of the strategic sites and help achieve the LDP city-wide 50:50 modal split target.

Together, the developments will deliver new and improved pedestrian and cyclist routes and facilities, bus priority measures, improved bus services and new routes and stops. Future public transport routes will also be protected. Traffic signal, junction and traffic management improvements will help to manage the flow of traffic on the network and hold queues in appropriate locations outside of AQMAs. A Park & Ride facility was also secured as part of Strategic Site D. The developments include travel plan measures and financial contributions towards air quality monitoring. The Planning Committee report for each application confirmed that the Environmental Statements were taken into consideration in the assessment of the application, that the conclusions were considered sound, and that there were no demonstrable or compelling reasons which indicate sufficient harm to warrant refusal of the application, with all material factors, policy implications and issues raised through consultation satisfactorily addressed.

### 3.5.2 Asphalt Batching Plant, Rover Way (19/01918/MJR)

In 2019, Cardiff Council received a planning proposal (referenced application (19/01918/MJR) for the installation of an asphalt batching plant, along with associated infrastructure and works, situated on land south of Rover Way, Pengam, Cardiff. The proposal was granted planning consent in 2019.

Supporting air quality assessments were undertaken to examine expected air quality impacts for the proposed year of opening (2023). The air quality assessments took consideration of the combined effects of both the traffic generated by the project and of the asphalt plant's combustion process. The report indicates that detailed air dispersion modelling has been used for both traffic and combustion process assessment. With respect to traffic a worst-case scenario is used that presumes 100% of the traffic generated will use Rover Way. The assessment indicates that the combined process contributions of the project would not exceed 1% of the respective Critical Level/Load of NO<sub>x</sub> and Nitrogen deposition for the Salt Meadow vegetation. The cumulative AQ assessment of the project, that considers this project in-combination with traffic from other committed projects and traffic from allocations within the LDP, includes a number of worst-case assumptions, including 100% of traffic from this project and other committed projects using Rover Way. The report indicates that the predicted cumulative NO<sub>x</sub> process contribution will exceed 1% of the 30 ug/m<sup>2</sup> NO<sub>x</sub> Critical Level over parts of the Salt Meadow.

As confirmed by NRW "The HRA document indicates that the contribution of the proposed development to the nutrient loading impacts on the salt-meadow is considered very difficult to quantify, and therefore uncertain, representing in effect a very small increase in nutrient input that may result in reduced species diversity over time. In visiting the site we have taken the opportunity to consider the current condition of the Salt Meadow vegetation at this location, in the light of the current background NO<sub>x</sub> and Nitrogen deposition levels, and to consider the potential for vegetation change minded of the scale of the predicted process contributions. Having considered both aspects we are satisfied that the scale and nature of any change would not be sufficient to undermine the Conservation Objectives for the Severn Estuary SAC Salt Meadow feature and would not have an adverse effect on the integrity of the Severn Estuary SAC. We therefore have no objection to the planning application on this basis."

### 3.5.3 Westgate Street Hotel 19/01538/MJR

PARTIAL DEMOLITION, REFURBISHMENT, CHANGE OF USE AND REDEVELOPMENT OF PARKGATE, THE FORMER COUNTY COURT BUILDING AND ADJACENT LAND FOR USE AS A HOTEL INCLUDING ASSOCIATED INTERNAL ALTERATIONS TO LISTED BUILDINGS | PARKGATE HOUSE, FORMER COUNTY COURT BUILDING AND ADJACENT LAND, WESTGATE STREET, CITY CENTRE, CARDIFF, CF10 1NW

For operational purposes, in order to determine potential impacts to air quality as a result of nearby traffic movements, supporting air quality modelling considers an understanding for a baseline scenario (2017) and a projected year of opening scenario (2021). The modelling adopts best practise guidance and considers a conservative approach to provide outcomes.

**Tables 13, 14, 15, 16 & 17** of the report outline the long term and short term air quality levels (NO<sub>2</sub>, PM<sub>10</sub> & PM<sub>2.5</sub>) with the proposed scheme in place for an opening year of 2021 (**With Scheme**).

Drawing reference to Table 14, the short term 1-hour NO<sub>2</sub> air quality objective is exceeded at identified receptor locations on the ground floor of the proposed hotel development; R4 & R5. The report therefore recommends that sufficient mitigation measures are implemented to address the identified concerns.

To alleviate the concerns evidenced at receptors R4 & R5, the applicant produced a ventilation strategy that will be imposed on site.

The ventilation strategy confirms that ventilation for the ground floor will be sourced via the rear of the proposed development. The assessment assesses the extracted air at the rear of the development noting this location as receptor R6 & R7.

The assessment suggests that the NO<sub>2</sub> 1-hour objective at R6 & R7 will not be exceeded. As part of the ventilation strategy, as agreed; for receptors R4 & R5 the applicant must ensure that any windows or openings for receptors R4 & R5 are closed. As stated by the report;

*“As the front of the building will have closed windows and an automatic door it is likely that air from the mechanical ventilation system will dominate the ground floor areas of the hotel.”*

The proposal has been granted outline planning consent subject to approval and discharge of Conditions set.

## 4. Polices and Strategies Affecting Airborne Pollution

### 4.1 Local / Regional Air Quality Strategy

#### Cardiff's Clean Air Strategy and Action Plan

SRS on behalf of Cardiff Council have coordinated and developed a Clean Air Strategy (CAS) & Action Plan document. The document outlines a citywide approach to mitigate poor air quality in Cardiff and recognises that interventions to address poor air quality cannot be utilised in silo and implemented locally. Therefore citywide measures need to be put into practise to hopefully provide citywide improvements to air quality.



The document fulfils the requirements of the LAQM process to produce an Air Quality Action Plan (AQAP). The document also captures the Direction given to CC in March 2018 by WG for Cardiff to address its air quality concerns along highlighted major road networks.

### 4.2 Air Quality Planning Policies

Cardiff's Local Development Plan (LDP) 2006-2026, forms the basis for decisions on land use planning in Cardiff up to 2026 and assumes that, within the plan's time frame, approximately 40,000 new jobs and 41,100 new dwellings will be developed in Cardiff as a direct response to Cardiff's role as the economic driver of the City-region.

In addition to its independent examination, the LDP was subject to a Strategic Environmental Assessment (SEA) to ensure that the policies reflect sustainability principles and take into account environmental impacts.

Policy KP2 of the LDP allocates 8 Strategic Sites to help meet the need for new dwellings and jobs. These strategic allocations on both greenfield and brownfield sites will include 500 homes or more and/or include significant employment/mixed uses which will bring significant benefits to the city. The sites are:

- (i) Cardiff Central Enterprise Zone;
- (ii) Former Gas Works, Ferry Road;
- (iii) North West Cardiff;
- (iv) North of Junction 33 on the M4;
- (v) South of Creigiau;
- (vi) North East Cardiff (West of Pontprennau);
- (vii) East of Pontprennau Link Road; and
- (viii) South of St. Mellons Business Park – Employment Only.

The LDP identifies that sustainable transportation solutions are required in order to respond to the challenges associated with new development by setting out an approach aimed at minimising car travel, maximising access by sustainable transportation and improving connectivity between Cardiff and the wider region.

The Plan sets out a strategy to achieve this by making the best use of the current network, managing demand and reducing it where possible by widening travel choices. The aim is to secure a modal split of 50% car and 50% non-car modes.

The following LDP policies are of relevance to air quality;

**KP14: HEALTHY LIVING**

*Cardiff will be made a healthier place to live by seeking to reduce health inequalities through encouraging healthy lifestyles, addressing the social determinants of health and providing accessible health care facilities. This will be achieved by supporting developments which provide for active travel, accessible and useable green spaces, including allotments.*

**KP18: NATURAL RESOURCES:**

*In the interests of the long-term sustainable development of Cardiff, development proposals must take full account of the need to minimise impacts on the city's natural resources and minimise pollution, in particular the following elements.....minimising air pollution from industrial, domestic and road transportation sources and managing air quality.*

**EN13: AIR, NOISE, LIGHT POLLUTION AND LAND CONTAMINATION**

*Development will not be permitted where it would cause or result in unacceptable harm to health, local amenity, the character and quality of the countryside, or interests of nature conservation, landscape or built heritage importance because of air, noise, light pollution or the presence of unacceptable levels of land contamination.*

**C6: HEALTH**

*Priority in new developments will be given to reducing health inequalities and encouraging healthy lifestyles through:*

- i. Identifying sites for new health facilities, reflecting the spatial distribution of need, ensuring they are accessible and have the potential to be shared by different service providers; and*
- ii. Ensuring that they provide a physical and built environment that supports interconnectivity, active travel choices, promotes healthy lifestyles and enhances road safety.*

The LDP also outlines the approach the Council will take to increase the proportion of people travelling by sustainable modes and to achieve the 50:50 modal split target. This will involve:

- enabling people to access employment, essential services and community facilities by walking and cycling through, for example, high quality, sustainable design and measures to minimise vehicle speed and give priority to pedestrians and cyclists;
- developing strategic bus and rapid transit corridor enhancements and facilitating their integration with the wider transport network;
- facilitating the transfer between transport modes by, for example, improving existing interchanges and developing new facilities such as strategically located park and ride facilities; and
- maximising provision for sustainable travel within new developments and securing infrastructure investment which can support modal shift within existing settlements.

At the time of writing this report Cardiff Council has commenced a full review process of its adopted LDP. To note; it is a statutory requirement to undertake a review of the LDP document within 4 years of plan adoption.

As part of the full review, this process must determine the revision procedure to be followed – specifically, whether to undertake a short form revision or full revision which would require the preparation of a replacement LDP. The meeting of Council on 28th November, 2019 considered this matter and the [report can be accessed here](#).

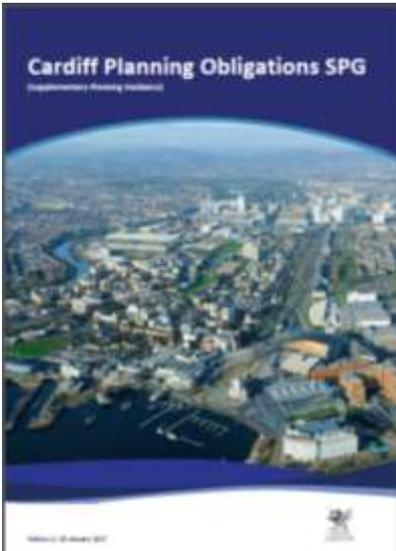
The preparation of a replacement LDP (for the period 2020 to 2035) is considered the most appropriate option to ensure the plan remains up to date.

The first stage in the review process is the publication of the draft review report and draft delivery agreement which was subject to a 4-week consultation period commencing Tuesday 14th January 2020 until Tuesday 11th February 2020.

The [Draft Review Report](#) provides an overview of the issues that have been considered as part of the LDP review process. It also sets out the potential options for revising the LDP and concludes that the preparation of a Replacement LDP (2020 to 2035) is considered the most appropriate option.

The preparation of a [Delivery Agreement](#) is a key requirement in preparing a Replacement LDP. The Draft Delivery Agreement provides details of the various stages involved in the Plan-making process and the time each part of the process is likely to take. It also sets out the way in which the Council proposes to involve the local community and other stakeholders in the preparation of a replacement LDP.

**Planning Obligations (January 2017)**



This document sets out the Council’s approach to planning obligations when considering applications for development. It provides further guidance on how the policies set out in the LDP are to be implemented and will assist in securing the provision of sustainable development across the city.

Poor air quality can impact on people’s health / quality of life and local authorities are required to assess air quality in their areas against National Air Quality Standards. Where the need arises as a result of a proposed development, the document confirms that developers will be requested to provide an Air Quality Assessment and, in the event of an adverse assessment, a proposed scheme of mitigation measures. In addition to a scheme of mitigation measures, a financial contribution may be sought towards the site specific monitoring of air quality emissions.

In respect of Transportation and Highways, the SPG confirms the Council will maximise opportunities for trips generated by new development to be made by walking, cycling and public transport and seek to ensure that the highway network is able to accommodate road traffic movements associated with new development in a safe and efficient manner. The following guidance is covered:

- developments requiring the provision of a Transport Statement or Transport Assessment;
- the provision of on-site infrastructure necessary to serve the development;
- the provision of or contribution towards offsite highway works, public transport infrastructure/ facilities provision and local interventions where the need arise;

- integrating public transport; and
- travel plans detailing a long term management and monitoring strategy for the delivery of sustainable transport objectives through positive action.

Planning obligations SPG is available at;

[https://www.cardiff.gov.uk/ENG/resident/Planning/Planning-Policy/Supplementary-Planning-Guidance/Documents/Cardiff%20Planning%20Obligations%20SPG%20-%20Edition%201%20\(26th%20January%202017\).pdf](https://www.cardiff.gov.uk/ENG/resident/Planning/Planning-Policy/Supplementary-Planning-Guidance/Documents/Cardiff%20Planning%20Obligations%20SPG%20-%20Edition%201%20(26th%20January%202017).pdf)

## 4.3 Local Transport Plans and Strategies

Cardiff is growing and changing, and this brings more journeys and more pressures on Cardiff's transport network. Reducing the number of car journeys made in the city, and promoting the use of active and sustainable modes of travel, are central to Cardiff Council's Transport Strategy and in improving air quality in the city. The LDP sets the target of achieving a 50:50 modal split – this means that 50% of all journeys need to be made by sustainable transport by 2026 in order to accommodate the future development set out in the LDP. Our policies set out in the LDP support the need to secure significant improvements to the public transport and active travel networks in combination with new developments.

Cardiff's Local Transport Plan (LTP) was approved by the Welsh Government in May 2015. The LTP sets out our main transport infrastructure proposals which will support this significant modal shift. The Local Transport Plan recognises the need to improve air quality. Its programme prioritises:

- development of active travel networks to increase walking and cycling for local journeys
- the provision of cycling infrastructure
- the bus network
- reduced speed limits
- reducing congestion
- improving transport efficiency and reliability
- bus based park and ride.

The Council has published an Annual Progress Report for Transport each year since 2002. These are available here:

<http://www.keepingcardiffmoving.co.uk/your-sustainable-travel-city>

### Challenges

Cardiff Council is committed to achieving a 50:50 modal split by 2026, as set out in Cardiff's Local Development Plan (LDP) 2006- 2026. However, there are a number of challenges that Cardiff faces in order to meet the 50:50 modal split;

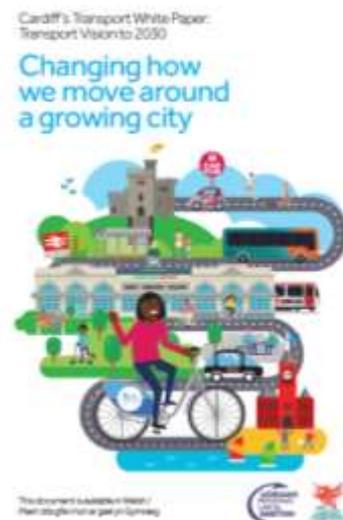
- **Future Growth** - Cardiff's LDP provides for 41,000 new homes and 40,000 new jobs in Cardiff by 2026. It is envisaged that this level of growth will generate a (net) road traffic increase by 32% and so existing pressures on Cardiff's transport network will be intensified. A significant shift is required from car use to sustainable travel;
- **Inbound Commuting Traffic** - 38% of Cardiff's workforce travel to Cardiff from outside the county area. This commuting workforce from outside the county area has seen a 10%

increase 2004 - 2014. Figures from the Census conducted in 2011 suggest that between 76% - 84% of the commuting workforce travel by car;

- **Health** - There is an urgent need to encourage healthy and active lifestyles in Cardiff; only 25% of Cardiff residents meet physical activity guidelines and 53% are obese or overweight (Welsh Health Survey 2010 and 2011). Social isolation and loneliness is another major need in our local population;
- **Sustainable and Active Travel Availability** - Areas poorly served by sustainable transport modes often have high levels of car ownership and become heavily reliant on the car for daily travel. The quality of the public transport network is major challenge for Cardiff; Ask Cardiff Surveys outlined a 4% decrease in daily bus use between 2007 and 2014. Across the UK over the last 5 years the cost of running a car has decreased by 5% while the cost of the bus has increased by 14% (Department for Transport). There is also a need for cycling and walking improvements in Cardiff. Levels of cycling are continuing to increase but 82% of Cardiff residents think cycling safety needs to be improved (Bike Life 2015).

### Cardiff's Transport White Paper

The Transport White Paper was launched on 15 January 2020 and lays out an ambitious 10-year plan to tackle the climate emergency, reduce congestion and improve air quality. It includes proposals for developing the South East Wales Metro, including new Metro lines connecting new and existing communities in the city, Rapid Bus Transport, Active Travel and improvements to our streets and the future of the car, including reducing car ownership through car clubs and greening through the expansion of EV charging infrastructure. Key regional projects are identified, with significant improvements proposed for all the major routes into the city. It also outlines the intention to consider all delivery options and to work with Welsh Government to develop a comprehensive investment plan. The timescale for the White Paper was amended in line with ongoing developments in relation to the Clean Air Plan to ensure alignment.



Document is available at;

<https://www.cardiff.gov.uk/ENG/resident/Parking-roads-and-travel/transport-policies-plans/transport-white-paper/Documents/White%20Paper%20for%20Cardiff%20Transport%202019.pdf>

### 4.4 Active Travel Plans and Strategies

In September 2014, the Welsh Government introduced the Active Travel (Wales) Act. This measure legally requires Welsh local authorities to map and plan suitable routes for Active Travel within certain areas, as designated by the Welsh Government.

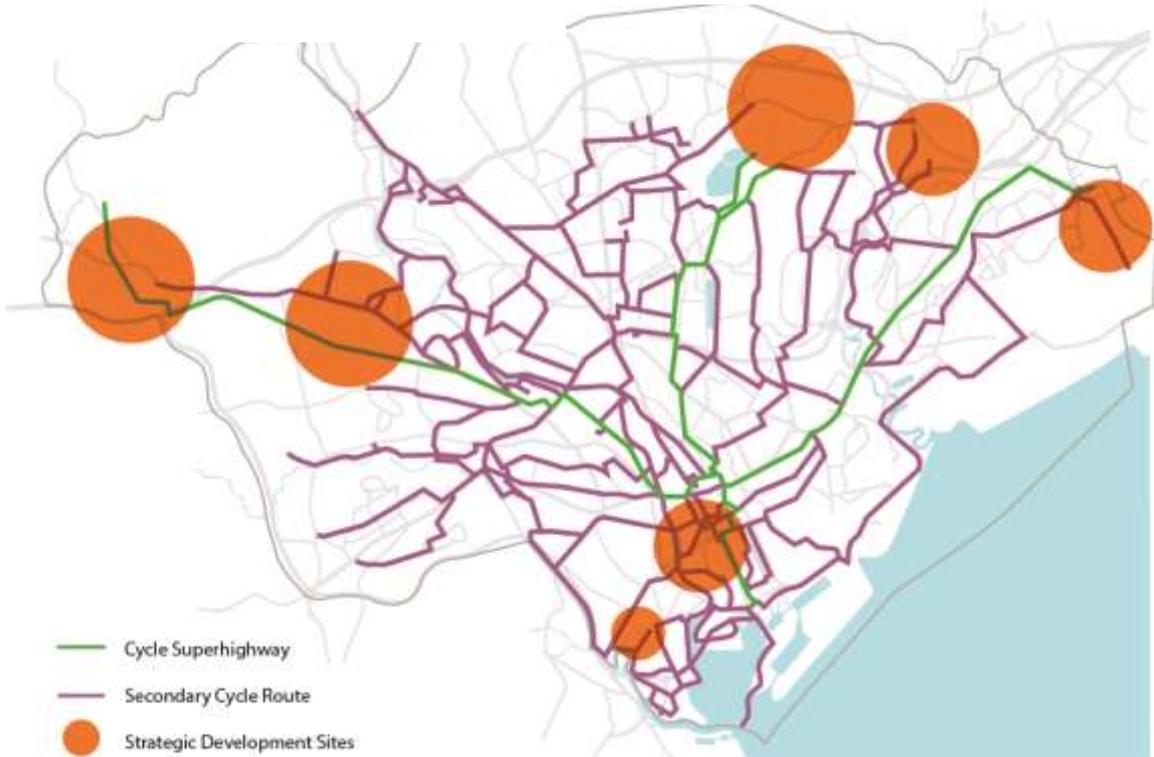
The Cardiff Cycling Strategy sets out an ambitious vision to double the number of cycling trips by 2026, from a 9.2% modal share in 2015 to 18.4% in 2026. In order to achieve this vision, it will be necessary to develop a comprehensive network of cycling infrastructure which is suitable for use by people of all ages and abilities, and to work with key partners from employers, retail and schools to ensure that appropriate cycling facilities are provided at destinations and to promote cycling.

Infrastructure improvements for walking and cycling are planned and prioritised through the Integrated Network Map (INM) as detailed in **Figure 35**. The INM defines a network of walking routes and cycling routes and a schedule of schemes to improve this network of routes over a 15 year period. In accordance with the requirements of the Active Travel Act, the INM will be submitted to the Welsh Ministers for approval in November 2017 and updated every 3 years.

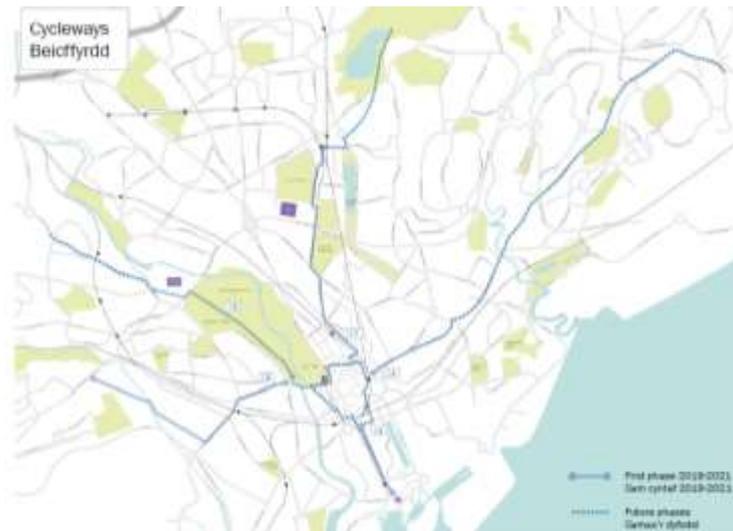
As displayed by **Figure 35**, the Cycling Strategy and INM sets out proposals for new cycleways which will provide high quality cycle routes, segregated from pedestrians and motor vehicles on busy roads, and will connect strategic development sites, existing residential areas, employment sites, the city centre and Cardiff Bay. These will be supported by a network of secondary routes.



**Figure 38- Integrated Network Map**



**Figure 39- Map of Cardiff's Cycleways Proposal**

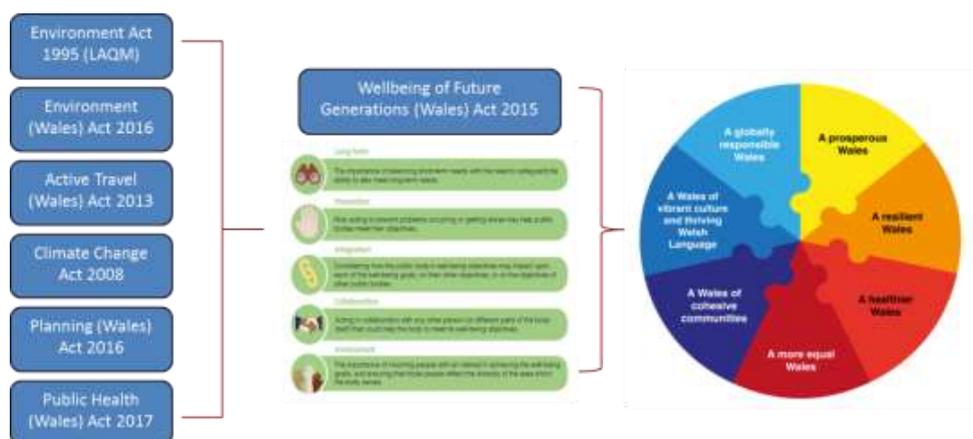


## 4.4 Local Authorities Well-being Objectives

In 2015 Welsh Government made a new law called the Well-being of Future Generations (WFG) (Wales) Act. The new law has the sustainable development principle at its heart. This means that we need to work in a way that improves wellbeing for people today without doing anything that could make things worse for future generations.

As highlighted in the earlier **Figure 5**, there are seven national well-being goals that form the basis of the Act and five ways of working which support the goals.

**Figure 5- The Well- being of Future Generations (Wales) Act 2015 Matrix**



CC adopts the principles of The Well-being of Future Generations (Wales) Act 2015. The Act is a significant enabler to improve air quality as it calls for sustainable cross-sector action based on the principles of long-term, prevention-focused integration, collaboration and involvement. It intends to improve economic, social, environmental and cultural well-being in Wales to ensure the needs of the present are met without compromising the ability of future generations to meet their own needs.

## Cardiff Well-Being Plan 2018-2023

Under the WFG Act the Cardiff Public Services Board (PSB) has produced its Well-Being Plan for 2018-2023<sup>2</sup>, which sets out the Cardiff PSB's priorities for action over the next 5 years, and beyond. The Plan contains Well-being Objectives, high-level priorities that the Cardiff PSB have identified as being most important. It also contains 'Commitments,' or practical steps that the city's public services, together, will deliver over the next 5 years. The Well-Being Plan has set out Well-Being Objectives as follows:



- **Objective 1** - A Capital City that Works for Wales;
- **Objective 2** - Cardiff grows in a resilient way;
- **Objective 3** - Safe, Confident and Empowered Communities
- **Objective 4** - Cardiff is a great place to grow up;
- **Objective 5** - Supporting People out of poverty;
- **Objective 6** - Cardiff is a great place to grow older; and
- **Objective 7** - Modernising and Integrating Our Public Services

Within the Well-Being Plan Objective 2 details the following; *Cardiff is one of Britain's fastest growing cities, and is by far the fastest growing local authority area in Wales. Successful cities are those in which people want to live and this growth is welcomed and a sure sign of strength for the city. However, this growth will bring challenges too, putting pressure on both the city's physical infrastructures, community cohesion, its natural environment and public services. Managing the impacts of this population growth and of climate change in a resilient and sustainable fashion will be a major long term challenge for Cardiff.*

Improving levels of NO<sub>2</sub> and particulate matter (PM<sub>10, 2.5</sub>) is a City level outcome indicator that the PSB will seek to impact in order to meet this specific Objective. The Plan forecasts a future Cardiff with improved air quality and has committed to taking 'a city-wide response to air pollution through supporting the development and delivery of a Cardiff Clean Air Strategy.'

## 4.5 Green Infrastructure Plans and Strategies

Outlined in Cardiff's Local Development Plan (LDP) 2006- 2021, Policy **KP16** focuses upon Green infrastructure.

### Policy KP16

#### Green Infrastructure

The policy aims to ensure that Cardiff's green infrastructure assets are strategically planned and delivered through a green infrastructure network. Other policies in the Plan provide more detailed guidance on aspects of these assets, together with supporting SPG.

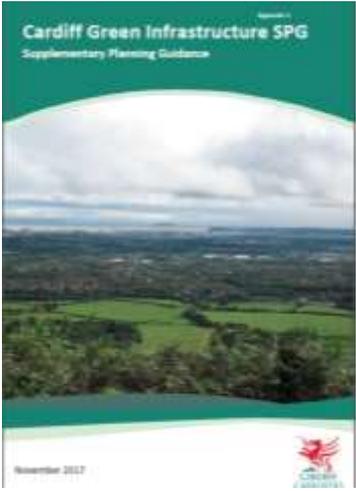
Where development is permitted, planning conditions and/or obligations will be used to protect or enhance the natural heritage network.

New developments should incorporate new and / or enhanced green infrastructure of an appropriate size, type and standard to ensure no fragmentation or loss of connectivity.

Where the benefits of development outweigh the conservation interest, mitigation and/or compensation measures will be required to offset adverse effects and appropriate planning obligations sought. The implementation of policies designed to provide and protect public open

<sup>2</sup> [Cardiff Well-Being Plan 2018-2023](#)

space throughout Cardiff would also serve to offset any increase in recreational pressure on the Cardiff Beech Woods SAC, thereby helping to avoid likely significant effect upon that site.



Management of Cardiff’s green infrastructure network should be in place prior to development, and appropriate planning obligations sought. SPG on this topic will more fully outline the extent of Cardiff’s green infrastructure and how this policy can be implemented in more detail.

As previously mentioned a new Supplementary Planning Guidance (SPG) concerning Green Infrastructure was approved in 2017 by CC to provide a detailed understanding to the elements raised in the LDP.

- This document provides planning advice on a number of areas relating to development and the environment, including protection and provision of open space, ecology and biodiversity, trees, soils, public rights of way, and river corridors.

- The new document also differs from previous SPGs by providing more in depth design advice, aimed at giving developers a clearer understanding of the approach expected when submitting designs for new developments. By having this information up-front developers are better able to provide suitable designs to the Council through the planning process

## 4.6 Climate Change Strategies

### One Planet Cardiff Strategy

An ambitious new plan designed to drive Cardiff towards becoming a carbon neutral city by 2030 has been unveiled by Cardiff Council.

‘One Planet Cardiff’ sets out the Council's response to the climate change emergency and calls upon businesses and residents to join forces with the council to make the lifestyle changes required, if Wales' capital is to become a truly ‘Green’ and sustainable city over the next ten years.

Full document available using the following link;

<https://www.oneplanetcardiff.co.uk/wp-content/uploads/OPC%20vision%20document%202020%20ENGLISH.pdf> Planning for Health and Well-being SPG (November 2017)



## Local Development Plan

Outlined in Cardiff's Local Development Plan (LDP) 2006- 2021, Policy **KP15** focuses upon Climate Change.

### Policy KP15

#### Climate Change

A core function of the Plan is to ensure that all development in the city is sustainable, taking full account of the implications of reducing resource use and addressing climate change. This Policy provides a framework for sustainable growth by promoting development that mitigates the causes of climate change and which is able to adapt to its likely effects. This long-term approach is vital if Cardiff is to realise the economic, environmental and social objectives set out in the Vision.

**To mitigate the effects of climate change and adapt to its impacts, development proposals should take into account the following factors:**

- **Reducing carbon emissions;**
- **Protecting and increasing carbon sinks;**
- **Adapting to the implications of climate change at both a strategic and detailed design level;**
- **Promoting energy efficiency and increasing the supply renewable energy; and**
- **Avoiding areas susceptible to flood risk in the first instance in accordance with the sequential approach set out in national guidance; and**
- **Preventing development that increases flood risk.**

## 5. Conclusions and Proposed Actions

### 5.1 Conclusions from New Monitoring Data

Monitoring data for 2019 indicates that annual mean concentrations of nitrogen dioxide recorded at sites of relevant exposure, within the already established AQMAs, continue to be elevated or exceed the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>).

### 5.2 Conclusions relating to New Local Developments/Sources

Section 3.5 details a number of local developments which have either gained planning consent recently or for which a planning application has been received.

These applications have been handled accordingly where Air Quality Assessments have been produced and conditions applied accordingly.

### 5.3 Other Conclusions

There are no other conclusions to be drawn from the information provided herein.

### 5.4 Proposed Actions

As a result of the information provided herein it is proposed to

1. Deliver and implement the proposed mitigation measures quantified within the Feasibility Study work;
2. Continue monitoring within and around the existing AQMAs and other areas of concern. The diffusion tube network appointed by SRS on behalf of Cardiff Council will be examined;
3. Continue to drive Air Quality as a major aspect to be considered during any planning applications, most importantly Cardiff Central Development;
4. Submit an Annual Progress Report (APR) in 2021; and
5. Update the existing Clean Air Strategy and Action Plan to represent most recent actions.

## References

Department for Environment, Food and Rural Affairs, 2003. *Part IV of the Environment Act 1995, Environment (Northern Ireland) Order 2002 Part III Local Air Quality Management, Technical Guidance LAQM.TG(16)*. London: DEFRA (February 2018).

Welsh Government, Local Air Quality Management in Wales, Policy Guidance, June 2017.

Cardiff Council 2019 Progress Report.

## Appendices

Appendix A: Monthly Diffusion Tube Monitoring Results

Appendix B: A Summary of Local Air Quality Management

Appendix C: Air Quality Monitoring Data QA/QC

# Appendix A: Monthly Diffusion Tube Monitoring Results

## Table 12– Full Monthly Diffusion Tube Results for 2019

WADZ Number 2019	Locality	Council	Site ID	Site Name	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Ave	Standard Deviation	DC	Ammoniated and Blank Corrected where needed	City Centre	Stephanswell	St Albans	St Leonards	St Leonards
CCC 036	46	167	N167	N167 Park Road	46.6	43.1	33.1	41	31.7	28.8	29	28.9	32.4	38.2	41.3	43.1	36.4	27.3	100.0						
CCC 083	49	Penarth Road			46.3	39.2	38.5	37.1	33.4	29.4	32.7	30	36.4	38.2	42.1	46.4	37.5	28.1	100.0						
CCC 092	58	Westgate Street			71.5	69.5	62.3	68.8	47.3	50.4	49.7	44.3	49.8	60.5			55.9	41.2	81.3						43.2
CCC 115	81	Stephenswell Court			58.1	48.1	42.3	41	43.1	38	41.1	39.2	46.4	46	54	52.6	45.8	34.4	100.0						
CCC 120	86	19 Fairloak Road			56.1	48.4	45.2	35.5	39.4	35.1	36.6	34.2	41.4	42.4	43.1	49.9	42.3	31.7	100.0						
CCC 130	96	Manor Way Junction			54	41.3	38.5	47.4	33.3	30.5	32.4	24.5	34.5	39.7	49.3	44.8	39.2	29.4	100.0						
CCC 132	98	Western Avenue (premises)			44	40.7	25.8	39.4	28.4	26.5	25.5	21.6	30.1	33.8	39.6	37.9	32.8	24.6	100.0						
CCC 133	99	Cardiff Road (landoff)			47	47.4	32.4	55.1	37.4	43.9	32	20.8	34.1	42.4	51.7	41.2	40.5	30.4	100.0						
CCC 135	101	Cardiff AURN																	EDV/DI						
CCC 136	102	Cardiff AURN																	EDV/DI						
CCC 137	103	Cardiff AURN																	EDV/DI						
CCC 140	106	30 Canphilly Road			51.6	49.8	34.4	33.2	31.4	25.9	27.5	27.8	31.1	42.5	46.2	50.7	37.7	28.3	100.0						
CCC 146	112	17 Soper Road			46.4	34.6	35	41	28.9	25.9	28	22.1	31.5	36.5	46.9	35.8	34.4	25.8	100.0						
CCC 149	115	21 Lansford Road			52.1	49.5	43.1	38.1	34.1	30.9	42.6	32.1	35.4	42.4	42.1	46.5	40.7	30.6	100.0						
CCC 151	117	25 Cowbridge Road West			59.1	57.6	28.2	67.1	48.2	45.4		33.5	46.4	47.6	51.9	54.5	49.0	36.8	11.7						
CCC 153	119	Havelock Street			53.1		48.8	51.4		29.1															
CCC 160	126	Westgate Street Flats			54.9		63.6	48.3	40.4	39.9	40.2	36.6	42.5	43.6			44.4	33.3	71.0						
CCC 162	128	117 Tudor Street			41	49.3	41	41.8	34.2	31.2	31.8	31.9	34.5	42.4	46.1	51.4	39.7	29.8	100.0						
CCC 165	131	Dragon Court			52.8	51.2	43.4	38.9	44.7	44	43	44.9	47.5	62.2	53.2	54.7	47.5	35.7	100.0						
CCC 168	134	Sandingham Road			30.8	56.5	39.5	42.9			35.7	37.4	40.3	66.7			42.5	31.9	64.7						
CCC 177	143	Windsor House			55.8	50.8	62.6	47.6	45.5	35.5	44.1		46.3	48			47.5	35.6	71.0						
CCC 178	144	Moriborough House			40.6	57	48.6	47.5		40.6	40.8	40	45.3	46.2			45.2	33.9	71.0						
CCC 179	145	Tudor Street Flats			50.4	43	39.9	42.8	30.1		27	28.3	35.5	39	46.5	42.3	38.4	28.8	11.7						
CCC 181	147	211 Penarth Road			42.9	44.4	32.2	46.7	30.4	27.2	27.2	19.1	29.4	35.5	47.6	47.1	35.8	26.9	100.0						
CCC 182	148	161 Clere Road			40.9	38.9	22.6	45.2	32.8	28.4	28.1	20.8	34	33.5	46.3	37.6	34.1	25.6	100.0						
CCC 183	149	10 Corporation Road			48.8	43.3	46	38.3	38.1	34.1	35.6	30.5	37	41.3	44	45.2	40.2	30.1	100.0						
CCC 187	153	Magie Roundabout			45.5	35.5	36.5	32.8	26	25.5	26.2	23.8	31.1	34	43.6	40.2	33.4	25.0	100.0						
CCC 190	156	24/4 Colum Road			42.4	39.2	22.6	42.1	31.1	26.6	24.1	16.7	29.5	35.4	50.4	36.7	33.1	24.8	100.0						
CCC 191	157	47 Bridgeway Road			40.9	34.9	38.9	30.9	26.6	24.2	23.8	24.5	23.5	34.2	35.1	40.6	31.5	23.6	100.0						
CCC 195	158	64/66 Cathays Terrace			28.8	41.9	29.4	40.6	28.5	23.2	22.1	17.7	29.5	34.9	49	41.7	32.3	24.2	100.0						
CCC 199	159	IMD Upgrade replacement			56.6	54.7	37.4	49.4	38	33.3	31.3	28	35.8	45.6	52.7	52.4	42.9	32.2	100.0						
CCC 204	160	High Street (Zoo)			47.8	35.9	41.1	33.7	30.6	26.7	27.8	30.9	34.4	1.3			31.3	23.5	81.3						
CCC 200	166	163 Lansdowne Road			52.6	51.2	47.3	41.2	36.7	32.3	34.1	32.5	36.8	43.8	45.2	48.8	41.9	31.4	100.0						
CCC 201	167	359 Lansdowne Road			44																				
CCC 202	168	370 Cowbridge Road East			32.7	37.3	32.1	38.9	33.9	28.1	29	22.1	30.2	33.9	41.7	35.9	33.0	24.7	100.0						
CCC 208	174	76 North Road			44.9	39.8	30.9	45.4	31.9	27.3	28	18.3	31	39.4	51.5	38.8	35.7	26.8	100.0						
CCC 213	179	Atolusso, Bute Terrace			62.6			70.3	62.4								66.9	60	62.4						46.8
CCC 217	183	Station Terrace			47	45.9	35.4	56.4	34.9	33.2	33.8	25.3	39.5	44.2	55	43.5	41.2	30.9	100.0						
CCC 218	184	Hophouse, St Mary Street			51.5			47									42.9	35.7	46.9						46.1
CCC 219	185	Northgate House, Duke Street			48	50.3	39.6	61.6	35.9	39.1	33.2	20.6	42.8	45.6	42.4		41.7	31.3	11.7						
CCC 220	186	Dempsy's Public House, Castle Street			65.6	61.5	60.4	70.6	62.1	51.6	48	46.2	65.8	58			57.9	42.7							
CCC 221	187	Angel Hall			76.7	58.6	76.3	60	55.6	54.9		64.6					64.9	48.0	81.3						47.7
CCC 222	188	Westgate Street (45 Apartments)			72.3	69.8		68.0	52.7			47.2	56.2	60			61.9	45.3	58.3						43.7
CCC 223	190	5 Pearson Street			44.5	40.2	32.3	29.8	28.2	22.5	22.2	24.0	26.8	34.3	34.1	34.9	31.2	23.4	100.0						
CCC 224	191	7 Mackintosh Place			45.3	53.2	41.6	36.3	33.7	28.4	29.2	28.7	30.2	34	39.2	46.4	37.2	27.9	100.0						
CCC 225	192	5 Cowbridge Road West			60.5	59.7	54.9	59	46	40.5	45.4	39.2	47.4	52.1	55.2	56.1	51.4	38.6	100.0						
CCC 226	193	24 Kings Road			31.4	32.3	23.9	29.4	20	17.9	17.9	15.4	21	31.3	35.5	32.4	25.7	19.3	100.0						
CCC 227	194	115 Cowbridge Road West			33.3	32.2	25.5	34.4	20.1	22.4	20.6	16.3	24.6	29.1	38	30.2	27.2	20.4	100.0						
CCC 228	195	244 Newport Road			49.6	51.2	41.3	44.8		34.5	35.1	30.7	34	44.8	44.7	47	41.6	31.2	91.7						
CCC 229	196	2 Pencilly Road			43.6	40	28.1	39.6	31.5	24.2	24.4	19.9	30.9	35.3	45.6	40.1	33.6	25.2	100.0						
CCC 230	197	69F 169 Newport Road			51	41.3	42.9	37.7	37.8	34.5	36.2		37.4	40.1	42.9	46.7	40.9	30.6	61.7						
CCC 231	198	Heol Building to Stephenswell Court			32.5	36.7	43.8	40.7	40.9	41	39.3	39.5	42.9	47.6	53.4	48.8	46.7	31.5	100.0						
CCC 232	199	157 Newport Road			45.8	40.1	32.9	29.3	29.5	25.5	27.1	24.3	29.7	35.4	43.9	36.5	33.3	25.0	100.0						
CCC 233	200	150 Whitcomb Road			56.7	43.4	38.9	41.2	26.2	37.2		28.4	39.2	46.1	53.5	44.2	41.4	31.1	100.0						
CCC 234	201	23 Clare Street			56.1	39.1	31.3	50.5	33.6	30.5	28.9	24	37.3	40.9	53.2	46.9	38.6	28.9	100.0						
CCC 235	202	10 Francis Road			39.6	31.5	28.9	47.5	33.8	27.2	29.8	26.5	32.7												

**Notes:**

Exceedances of the NO<sub>2</sub> annual mean objective of 40µg/m<sup>3</sup> are shown in **bold**.

NO<sub>2</sub> annual means exceeding 60µg/m<sup>3</sup>, indicating a potential exceedance of the NO<sub>2</sub> 1-hour mean objective are shown in **bold and underlined**.

(1) See Appendix C for details on bias adjustment and annualisation.

(2) Distance corrected to nearest relevant public exposure.

## Appendix B: A Summary of Local Air Quality Management

### Purpose of an Annual Progress Report

This report fulfils the requirements of the Local Air Quality Management (LAQM) process as set out in the Environment Act 1995 and associated government guidance. The LAQM process places an obligation on all local authorities to regularly review and assess air quality in their areas and to determine whether or not the air quality objectives are being achieved. Where exceedances occur, or are likely to occur, the local authority must then declare an Air Quality Management Area (AQMA) and prepare a **DRAFT** Air Quality Action Plan (AQAP) within 18 months, setting out measures it intends to put in place to improve air quality in pursuit of the air quality objectives. The AQAP must be **formally** adopted prior to 24 months has elapsed. Action plans should then be reviewed and updated where necessary at least every 5 years.

For Local Authorities in Wales, an Annual Progress Report replaces all other formal reporting requirements and have a very clear purpose of updating the general public on air quality, including what ongoing actions are being taken locally to improve it if necessary.

### Air Quality Objectives

The air quality objectives applicable to LAQM in Wales are set out in the Air Quality (Wales) Regulations 2000, No. 1940 (Wales 138), Air Quality (Amendment) (Wales) Regulations 2002, No 3182 (Wales 298), and are shown in **Table 13**.

The table shows the objectives in units of microgrammes per cubic metre  $\mu\text{g}/\text{m}^3$  (milligrammes per cubic metre,  $\text{mg}/\text{m}^3$  for carbon monoxide) with the number of exceedances in each year that are permitted (where applicable).

**Table 13– Air Quality Objectives Included in Regulations for the Purpose of LAQM in Wales**

Pollutant	Air Quality Objective		Date to be achieved by
	Concentration	Measured as	
Benzene	16.25 µg/m <sup>3</sup>	Running annual mean	31.12.2003
	5.00 µg/m <sup>3</sup>	Annual mean	31.12.2011
1,3-butadiene	2.25 µg/m <sup>3</sup>	Running annual mean	31.12.2003
Carbon monoxide	10 mg/m <sup>3</sup>	Running 8-hour mean	31.12.2003
Lead	0.50 µg/m <sup>3</sup>	Annual mean	31.12.2004
	0.25 µg/m <sup>3</sup>	Annual mean	31.12.2008
Nitrogen dioxide	200 µg/m <sup>3</sup> not to be exceeded more than 18 times a year	1-hour mean	31.12.2005
	40 µg/m <sup>3</sup>	Annual mean	31.12.2005
Particulate matter (PM <sub>10</sub> ) (gravimetric)	50 µg/m <sup>3</sup> , not to be exceeded more than 35 times a year	24-hour mean	31.12.2004
	40 µg/m <sup>3</sup>	Annual mean	31.12.2004
Sulphur dioxide	350 µg/m <sup>3</sup> , not to be exceeded more than 24 times a year	1-hour mean	31.12.2004
	125 µg/m <sup>3</sup> , not to be exceeded more than 3 times a year	24-hour mean	31.12.2004
	266 µg/m <sup>3</sup> , not to be exceeded more than 35 times a year	15-minute mean	31.12.2005

# Appendix C: Air Quality Monitoring Data QA/QC

## Diffusion Tube Bias Adjustment Factors

A database of bias adjustment factors determined from Local Authority co-location studies throughout the UK has been collated by the LAQM Helpdesk. The National Diffusion Tube Bias Adjustment Factor Spreadsheet (Version 09/20) was used to obtain an overall adjustment factor of 0.75 from the input data shown in the following screenshot. This overall factor is based on 42 co-location studies where the tube preparation method and analysis laboratory used were the same as those used by CC.

Figure 40: National Diffusion Tube Bias Adjustment Factor Spreadsheet

National Diffusion Tube Bias Adjustment Factor Spreadsheet						Spreadsheet Version Number: 09/20				
Follow the steps below in the correct order to show the results of relevant co-location studies						This spreadsheet will be updated at the end of March 2021				
Data only apply to tubes exposed monthly and are not suitable for correcting individual short-term monitoring periods						Whenever presenting adjusted data, you should state the adjustment factor used and the version of the spreadsheet				
This spreadsheet will be updated every few months, the factors may therefore be subject to change. This should not discourage their immediate use.						LAQM Helpdesk Website				
The LAQM Helpdesk is operated on behalf of Defra and the Devolved Administrations by Bureau Veritas, in conjunction with contract partners AECOM and the National Physical Laboratory.						Spreadsheet maintained by the National Physical Laboratory. Original compiled by Air Quality Consultants Ltd.				
<b>Step 1:</b> Select the Laboratory that Analyses Your Tubes from the Drop-Down List		<b>Step 2:</b> Select a Preparation Method from the Drop-Down List		<b>Step 3:</b> Select a Year from the Drop-Down List		<b>Step 4:</b> Where there is only one study for a chosen combination, you should use the adjustment factor shown with caution. Where there is more than one study, use the overall factor <sup>2</sup> shown in blue at the foot of the final column.				
If a laboratory is not chosen, we have no data for this laboratory.		If a preparation method is not chosen, we have no data for this method at this laboratory.		If a year is not chosen, we have no data.		If you have your own co-location study then see footnote <sup>1</sup> . If uncertain what to do then contact the Local Air Quality Management Helpdesk at LAQMhelpdesk@bureauveritas.com or 0800 0327953				
Analysed By	Method	Year	Site Type	Local Authority	Length of Study (months)	Diffusion Tube Mean Conc. (Dm) (µg/m <sup>3</sup> )	Automatic Monitor Mean Conc. (Cm) (µg/m <sup>3</sup> )	Bias (B)	Tube Precision <sup>1</sup>	Bias Adjustment Factor (A)
Socotec Didcot	50% TEA in acetone	2019	B	Gravesham Borough Council	12	27	25	10.9%	G	0.90
Socotec Didcot	50% TEA in acetone	2019	R	Slough Borough Council	11	39	32	22.5%	G	0.82
Socotec Didcot	50% TEA in acetone	2019	SU	Slough Borough Council	11	32	22	48.7%	G	0.68
Socotec Didcot	50% TEA in acetone	2019	UB	Slough Borough Council	10	38	31	25.6%	G	0.80
Socotec Didcot	50% TEA in acetone	2019	R	Swansea Council	12	32	24	35.6%	G	0.74
Socotec Didcot	50% TEA in acetone	2019	UB	Swansea Council	12	17	13	31.0%	G	0.76
Socotec Didcot	50% TEA in acetone	2019	R	Knowsley MBC	12	46	37	23.5%	G	0.81
Socotec Didcot	50% TEA in acetone	2019	UI	North Lincolnshire Council	12	22	15	47.5%	G	0.68
Overall Factor <sup>2</sup> (42 studies)									Use	0.75

### Discussion of Choice of Factor to use

The bias adjustment factor applied to all 2019 data is 0.75. The applied bias adjustment factor has been calculated using the national diffusion tube bias adjustment factor spreadsheet version 09/20. Due to insufficient data capture <90%, in accordance with Defra's LAQM (TG16), Box 7.11 it is preferable not to perform a co-location study due to concerns associated with the data quality. The National Bias Adjustment Factor supplied by the LAQM Defra website, based on 42 studies, which appointed Socotec UK Ltd Didcot laboratory, gave a figure of 0.75 and so this has been adopted for ratification purposes.

## Short-Term to Long-Term Data Adjustment

### AMS Adjustment

AURN station 1 (City Centre, Frederick Street) suffered poor data capture for NO<sub>2</sub> & PM<sub>10</sub> in 2019 (62.5% & 67.7%). As a result, the finalised NO<sub>2</sub> & PM<sub>10</sub> figures presented in this report for the AURN 1 monitoring site have been annualised according to the methods presented in Box 7.9 of LAQM (TG16). A Long-term AURN urban background continuous monitoring site within a distance of approximately 50 miles from Cardiff was selected for the purposes of this procedure.

**Table 14- Long term AURN site used for calculation of NO<sub>2</sub> annualisation ratio for Cardiff City Centre AURN 1**

Site	Site Type	Annual Mean (µg/m <sup>3</sup> )	Period Mean (µg/m <sup>3</sup> )	Ratio
St Julians School Newport AURN	Urban Background	19.9	16.22	1.23
Average Ratio				1.23

**Table 15- Long term AURN site used for calculation of PM<sub>10</sub> annualisation ratio for Cardiff City Centre AURN 1**

Site	Site Type	Annual Mean (µg/m <sup>3</sup> )	Period Mean (µg/m <sup>3</sup> )	Ratio
St Julians School Newport AURN	Urban Background	15.3	16.11	0.95
Average Ratio				0.95

### Diffusion Tubes Adjustment

The annual average nitrogen dioxide (NO<sub>2</sub>) datasets obtained via the use of passive diffusion tubes during January to December 2019 were annualised via the method described in Box 7.10 of LAQM TG(16). Due to potential quality issues surrounding Cardiff's City Centre AURN 1 NO<sub>2</sub> data, a long-term AURN urban background continuous monitoring site within a distance of approximately 50 miles from Cardiff was selected.

**Table 16– Long term AURN site used for calculation of nitrogen dioxide annualisation ratio for Diffusion Tube 134**

Site	Site Type	Annual Mean (µg/m <sup>3</sup> )	Period Mean (µg/m <sup>3</sup> )	Ratio
St Julians School Newport AURN	Urban Background	15.24	16.35	0.93

**Table 17– Long term AURN site used for calculation of nitrogen dioxide annualisation ratio for Diffusion Tube 179**

Site	Site Type	Annual Mean (µg/m <sup>3</sup> )	Period Mean (µg/m <sup>3</sup> )	Ratio
St Julians School Newport AURN	Urban Background	15.24	21.3	0.71

**Table 18– Long term AURN site used for calculation of nitrogen dioxide annualisation ratio for Diffusion Tube 187**

Site	Site Type	Annual Mean (µg/m <sup>3</sup> )	Period Mean (µg/m <sup>3</sup> )	Ratio
St Julians School Newport AURN	Urban Background	15.24	16.64	0.92

**Table 19– Long term AURN site used for calculation of nitrogen dioxide annualisation ratio for Diffusion Tube 188**

Site	Site Type	Annual Mean ( $\mu\text{g}/\text{m}^3$ )	Period Mean ( $\mu\text{g}/\text{m}^3$ )	Ratio
St Julians School Newport AURN	Urban Background	15.24	15.97	0.95

**Table 20– Long term AURN site used for calculation of nitrogen dioxide annualisation ratio for Diffusion Tube 220**

Site	Site Type	Annual Mean ( $\mu\text{g}/\text{m}^3$ )	Period Mean ( $\mu\text{g}/\text{m}^3$ )	Ratio
St Julians School Newport AURN	Urban Background	15.24	16.78	0.91

**Table 21- Long term AURN site used for calculation of nitrogen dioxide annualisation ratio for Diffusion Tube 222**

Site	Site Type	Annual Mean ( $\mu\text{g}/\text{m}^3$ )	Period Mean ( $\mu\text{g}/\text{m}^3$ )	Ratio
St Julians School Newport AURN	Urban Background	15.24	12.55	1.21

**Table 22- Long term AURN site used for calculation of nitrogen dioxide annualisation ratio for Diffusion Tube 224**

Site	Site Type	Annual Mean ( $\mu\text{g}/\text{m}^3$ )	Period Mean ( $\mu\text{g}/\text{m}^3$ )	Ratio
St Julians School Newport AURN	Urban Background	15.24	14.04	1.09

### QA/QC of Diffusion Tube Monitoring

The diffusion tubes are supplied and analysed by Socotec UK Ltd Didcot, using the 50% triethanolamine (TEA) in water method. Socotec UK Ltd Didcot participates in the Annual Field Inter-Comparison Exercise and Workplace Analysis Scheme for Proficiency (WASP) inter-comparison scheme for nitrogen dioxide diffusion tube analysis. From April 2014 the WASP Scheme was combined with the STACKS scheme to form the new AIR scheme, which Socotec UK Ltd Didcot participates in. The AIR scheme is an independent analytical proficiency testing scheme operated by LGC Standards and supported by the Health and Safety Laboratory (HSL).

The laboratory Socotec UK Ltd Didcot is regarded ranked as the highest rank of satisfactory in relation to the WASP intercomparison scheme for spiked nitrogen dioxide diffusion tubes. Information regarding tube precision can be obtained via <http://laqm.defra.gov.uk/diffusion-tubes/precision.html> Information regarding WASP results can be obtained via <http://laqm.defra.gov.uk/diffusion-tubes/qa-qc-framework.html>

## Glossary of Terms

Abbreviation	Description
AQAP	Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the LA intends to achieve air quality limit values'
AQA	Air Quality Assessment
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
APR	Air quality Annual Progress Report
AURN	Automatic Urban and Rural Network (UK air quality monitoring network)
CC	Cardiff Council
CASAP	Clean Air Strategy and Action Plan
Defra	Department for Environment, Food and Rural Affairs
DMRB	Design Manual for Roads and Bridges – Air quality screening tool produced by Highways England
FDMS	Filter Dynamics Measurement System
LAQM	Local Air Quality Management
NO <sub>2</sub>	Nitrogen Dioxide
NO <sub>x</sub>	Nitrogen Oxides
PM <sub>10</sub>	Airborne particulate matter with an aerodynamic diameter of 10µm (micrometres or microns) or less
PM <sub>2.5</sub>	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less
QA/QC	Quality Assurance and Quality Control
SO <sub>2</sub>	Sulphur Dioxide

---

**ENDORSEMENT OF SECOND REVIEW OF SOUTH WALES  
AGGREGATES REGIONAL TECHNICAL STATEMENT**

**STRATEGIC PLANNING & TRANSPORT (COUNCILLOR CARO  
WILD)**

**AGENDA ITEM: 15**

---

**Reason for this Report**

1. To seek Cabinet's endorsement of the recommendations contained in the Second Review of the South Wales Aggregates Regional Technical Statement (RTS) and agree the progression of the Statement of Sub-Regional Collaboration.

**Background**

2. Minerals Technical Advice Note 1: Aggregates (MTAN1), issued by the Welsh Government in March 2004, has a primary objective of seeking to ensure a sustainably managed supply of aggregates that are essential for construction, by striking the best balance between environmental, economic and social costs. To achieve that objective MTAN1 requires the preparation of Regional Technical Statements (RTS) for the areas covered by both the South Wales and North Wales Regional Aggregates Working Parties (RAWPs). The original RTS documents for both regions were completed in 2008 and are required, by MTAN 1, to be reviewed every five years. The First Review was undertaken in 2013/2014 and this, the Second Review, commenced in 2018.
3. The Second Review of the RTS has been prepared by the South Wales Regional Aggregates Working Party (RAWP) and provides a strategic basis for aggregates supply for Local Development Plans (LDPs) in the South Wales region until 2041. As appropriate, local planning authorities will then be expected to include allocations for aggregates provision in their area as part of the LDP process.
4. The RAWP comprises the 18 authorities within South Wales together with representatives of the quarrying industry and the Natural Resources Wales. The RAWP is chaired by Carmarthenshire County Council, who have co-ordinated preparation of the Second Review of the RTS, with funding from the Welsh Government. Formal consultation on the document took place between the 30<sup>th</sup> September 2019 and 25<sup>th</sup> November 2019.

5. The RTS is required to be endorsed by each of the consistent authorities within the South Wales region. Once endorsed by the RAWP and the constituent planning authorities, the RTS will be used to inform the minerals sections of LDPs. The RTS is monitored annually by the RAWP.

### **Implications for Cardiff**

6. The methodology used in the previous (First) Review, in 2014, for calculating individual planning authorities apportionments had been based primarily on historical sales averages, combined with an assessment of the various 'drivers' of potential future change. For the Second Review, this has been combined with an attempt to reflect planned future requirements for housing construction activity, and to avoid perpetuating historical supply patterns in areas where there is scope to encourage more sustainable patterns of supply.
7. Cardiff is required, through its Local Development Plan process, to meet the apportionment set out in the RTS. For Cardiff this requirement is set at 34.6 million tonnes of crushed rock for the LDP period. The authority currently has an existing landbank of 27.8 million tonnes of permitted reserves for crushed rock meaning a shortfall of 6.8 million tonnes will need to be identified through new allocations in the proposed Replacement LDP.
8. The RTS requires the apportionment to be met through the allocation of Specific Sites or, failing that, Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved. If it is not possible for Cardiff to meet this requirement then a sub-regional approach is required. For this purpose Cardiff has been grouped with Caerphilly, Vale of Glamorgan, Rhondda Cynon Taf, Bridgend, Merthyr Tydfil and Brecon Beacons National Park.
9. A Statement of Sub-Regional Collaboration (SSRC) is required to be prepared as part of the evidence base needed to support each Local Development Plan (LDP). The purpose of the SSRC is to confirm that all constituent LPAs within a particular RTS sub-region accept the individual apportionments for aggregates for their individual Authority areas, as set out in the latest Review of the RTS, and that (as a minimum) the RTS requirements for that sub-region as a whole will therefore be met.
10. The Replacement LDP process would need to set out the favoured solution and would assess whether to roll forward the existing 'Preferred Areas' of known resources based on existing quarries with permission for mineral working or further explore the other options set out in para 8 above.
11. Cardiff's proposed Replacement LDP will also need to safeguard primary aggregate resources. This will mean that relevant resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the proposed Replacement LDP, in accordance with

detailed advice based on the use of British Geological Survey mapping. These resources are already safeguarded in the adopted LDP and this approach could be taken forward into the new plan.

12. Cardiff also plays an important strategic role in the delivery of marine based supplies currently being landed at two wharves within Cardiff Docks. Therefore, as in the adopted LDP, the proposed Replacement LDP will need to safeguard wharves in order to provide a full range of sustainable transport options.
13. As set out above these requirements will need to be considered in the forthcoming preparation of the proposed Replacement LDP. This process will be informed by existing allocations and policies in the current adopted LDP, which include a Preferred Area for crushed rock and existing policies that protect primary aggregate resources and sand wharves within Cardiff docks.

### **Reason for the Recommendation**

14. To comply with Welsh Government guidance on the process for preparing the 2<sup>nd</sup> Review of the RTS.

### **Financial Implications**

15. Any financial implications arising from the endorsement of the RTS will be funded from existing resources.

### **Legal Implications**

16. Regional Technical Statements (RTS) are required, by Minerals Technical Advice Note 1: Aggregates, to be reviewed every five years. The RTS is required to be endorsed by each of the constituent authorities within the South Wales region. The RTS will be used to inform the minerals sections of Local Development Plans. The RTS has been developed through a series of consultation events and processes. The report provides comprehensive information about the process followed.

### **Equality Act 2010**

17. The decision about these recommendations has to be made in the context of the Council's public sector equality duties. The Council also has to satisfy its public sector duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The Protected characteristics are: age, gender reassignment, sex, race – including ethnic or national origin, colour or nationality, disability, pregnancy and maternity, marriage and civil partnership, sexual orientation, religion or belief – including lack of belief.

## The Well-Being of Future Generations (Wales) Act 2015

18. The Act places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible. In discharging its duties under the Act, the Council has set and published wellbeing objectives designed to maximise its contribution to achieving the national wellbeing goals. The wellbeing objectives are set out in the Council's Corporate Plan.
19. When exercising its functions, the Council is required to take all reasonable steps to meet its wellbeing objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the wellbeing objectives and must be satisfied that all reasonable steps have been taken to meet those objectives. The wellbeing duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:
- Look to the long term
  - Focus on prevention by understanding the root causes of problems
  - Deliver an integrated approach to achieving the 7 national well-being goals
  - Work in collaboration with others to find shared sustainable solutions
  - Involve people from all sections of the community in the decisions which affect them
20. The decision maker must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible using the link below:

<http://gov.wales/topics/people-and-communities/people/futuregenerations-act/statutory-guidance/?lang=en>

### **Human Resources Implications**

21. There are no HR implications for this report.

### **Property Implications**

22. There are no specific property implications to the attached report. Where there are any Council land transactions required to deliver any proposals, they should be done so in accordance with the Council's Asset Management process and in consultation with Strategic Estates and relevant service areas.

## RECOMMENDATION

Cabinet is recommended to endorse the recommendations contained in the Second Review of the South Wales Aggregates Regional Technical Statement (RTS) and agree the progression of the Statement of Sub-Regional Collaboration as part of the evidence base for the proposed Replacement LDP.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Andrew Gregory</b> Director of Planning, Transport & Environment
	11 December 2020

*The following Appendices are attached:*

Appendix 1: Regional Technical Statements for the North Wales and South Wales Regional Aggregate Working Parties - 2nd Review - (Main Document) September 2020

Appendix 2: Regional Technical Statement (2nd Review) Appendix B (South Wales) September 2020:

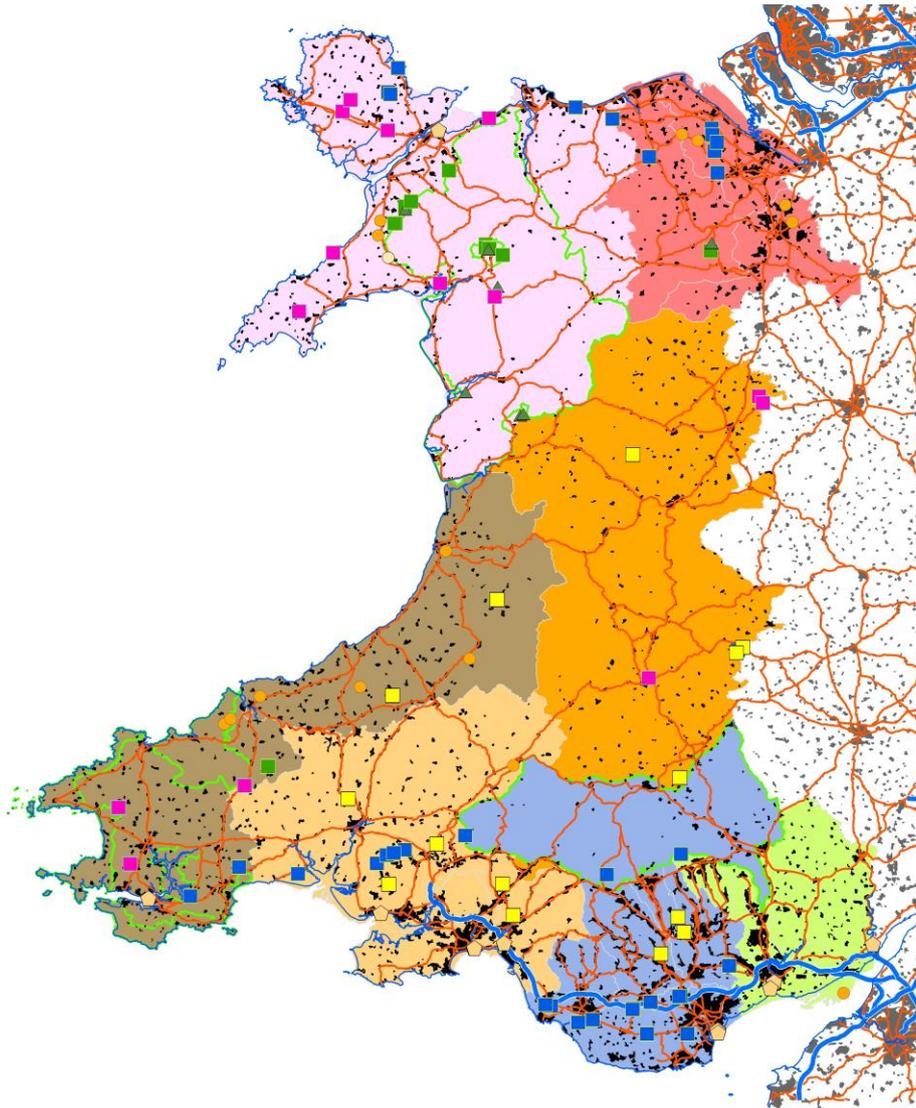
This page is intentionally left blank

# Regional Technical Statements

for the North Wales and South Wales

Regional Aggregate Working Parties

**- 2<sup>nd</sup> Review -**  
(Main Document)



*Final - September 2020*

North Wales  
Regional  
Aggregates  
Working Party



Llywodraeth Cymru  
Welsh Government

South Wales  
Regional  
Aggregates  
Working Party

# CONTENTS

---

Foreword.....	i
Statement from the Minister for Energy, Planning & Rural Affairs .....	ii
Executive Summary.....	iii
<b>1. The Purpose and Objectives of the RTS .....</b>	<b>1</b>
Introduction.....	1
Policy Context and Sustainability Objectives.....	1
The Scope and Purpose of RTS Recommendations .....	5
Aims and Objectives of the RTS 2 <sup>nd</sup> Review.....	7
<b>2. Key Principles .....</b>	<b>10</b>
The RTS Approach.....	10
The Proximity Principle.....	11
Environmental Capacity.....	13
Changing the Pattern of Supply.....	14
<b>3. Methodology for the 2<sup>nd</sup> Review of the RTS.....</b>	<b>16</b>
Introduction.....	16
Preliminary Research.....	16
Agreed Methodology.....	29
<b>4. Analysis of the Existing Supply Pattern .....</b>	<b>32</b>
Introduction.....	32
National and Regional Analysis.....	33
Sub-Regional Analysis of Supply Patterns .....	49
<b>5. Assessment of Apportionments and Allocations.....</b>	<b>50</b>
STAGE 1: Setting the National Level for Future Aggregates Provision .....	50
STAGE 2: Calculation of the Regional Split between North Wales and South Wales.....	52
STAGE 3: Calculation of Sub-Regional and LPA Apportionments .....	52
STAGE 4: Sand & Gravel / Crushed Rock Split and Allocations for Future Working.....	58
<b>6. Consultation Process.....</b>	<b>68</b>
References.....	70

<b>Annex A: Guidance Note on Sub-Regional Collaboration.....</b>	<b>72</b>
<b>Glossary.....</b>	<b>74</b>
<b>Abbreviations .....</b>	<b>77</b>
<b>Acknowledgements .....</b>	<b>78</b>
<b>Appendix A (North Wales) .....</b>	<i>(issued separately)</i>
<b>Appendix B (South Wales) .....</b>	<i>(issued separately)</i>

Prepared, on behalf of the Welsh Government and the North Wales and South Wales Regional Aggregate Working Parties

by: **Cuesta Consulting Limited.**

(01460) 929 905 / 07952 170 180

[alan.thompson@cuesta-consulting.com](mailto:alan.thompson@cuesta-consulting.com)

## Foreword

Since the original Regional Technical Statements (RTS) were issued in October 2008, forward planning for minerals has formed an intrinsic part of the Local Development Plan (LDP) process. The LDPs have benefited from the clear direction the RTS has provided on the sustainable approach to mineral development in Wales. There is almost full LDP coverage and all have embraced the principal objectives of the RTS to provide adequate reserves of aggregate for the construction and other industries in the most sustainable manner reasonably achievable.

It is particularly satisfying to see certain elements of the RTS, such as the safeguarding of mineral resources, now enshrined in development plans to ensure such resources are protected for future generations. More importantly, new allocations, defined areas of search and preferred areas have also been incorporated into some LDPs.

As was the case with the First Review of the RTS, this Second Review has been prepared, on behalf of the North Wales and South Wales RAWPs, by Cuesta Consulting Ltd., with advice and peer review from a Steering Group which included representatives from both Regional Aggregate Working Parties (RAWPs), the Mineral Products Association and industry, Natural Resources Wales, officers from local government and the Welsh Government. The Steering Group provided vital technical information, updating and refining that given in previously published RAWP reports and in the original Regional Technical Statements. The Steering Group also provided or confirmed expert judgement, where this was called for in situations where precise factual detail was not available, and has provided a consensus endorsement of the various recommendations.

The Second Review RTS covers the 25 year period up to 2041, but further reviews will still be initiated every 5 years, in accordance with MTAN1, to ensure that the RTS can react to any significant change in circumstances. This will ensure that any major changes to supply and demand can be addressed and the RTS changed or modified as appropriate. This process underpins the plan, monitor and manage approach to aggregate planning in the UK. The new edition will continue to be considered as a strategic document for the purposes of Development Plan preparation and may be a material consideration when determining planning applications. We remain confident that all authorities will continue to embrace and implement the recommendations of the revised RTS in their development plans on a voluntary basis, and that Welsh Government (WG) will not need to have recourse to its powers of direction.

We would like to take this opportunity to gratefully acknowledge the considerable amount of work that has been undertaken to complete the Second Review, which includes the significant efforts of the RTS steering group and the diligent work of the consultant appointed to undertake and complete the work on schedule on behalf of the Welsh Government, and the participation of key stakeholders.

The Second Review has built on the foundation of the original RTS and the First Review and has been further refined and now offers greater clarity and is more concise. Most importantly, it provides a strong and improved statement of the desire to ensure that sustainability is at the heart of all future mineral planning in Wales.

*Llinos Quelch*

Chair of the South Wales Regional Aggregates Working Party.

*Andrew Farrow*

Chair of the North Wales Regional Aggregates Working Party.

Date 22<sup>nd</sup> July 2020

## **Statement from the Minister for Energy, Planning & Rural Affairs**

To be Added.

## Executive Summary

Minerals Technical Advice Note 1: Aggregates (2004) (MTAN 1) requires the preparation of Regional Technical Statements (RTS) for the areas covered by both the South Wales and North Wales Regional Aggregates Working Parties (RAWPs). Whereas MTAN1 develops the national policy set out originally in Minerals Planning Policy Wales (now part of Planning Policy Wales - PPW), the RTS provides the supporting detail which allows this to be implemented.

The original RTS documents for both regions were completed in 2008 and are required, by MTAN 1, to be reviewed every five years. The First Review was undertaken in 2013/2014 and this, the Second Review, commenced in 2018.

In contrast with the former guidelines for aggregate provision issued for England and Wales, prior to devolution, the RTS process has always avoided any attempt to make detailed forecasts of future demand based on econometric modelling. In the past, these had been found to be unreliable and were criticised for their lack of transparency. Instead, a series of alternative approaches have been used in Wales and each 5-yearly review of the RTS provides opportunities for further refinement.

The methodology used in the previous (First) Review, in 2014, had been based primarily on historical sales averages, combined with an assessment of the various 'drivers' of potential future change. For the Second Review, this has been combined with an attempt to reflect *planned* future requirements for housing construction activity, and to avoid perpetuating historical supply patterns in areas where there is scope to encourage more sustainable patterns of supply. Data used for this purpose have been the housing requirement figures established for existing, adopted, Local Development Plans (LDPs) for each individual Local Planning Authority (LPA). Given that LDP progress has varied from one authority to another, some of the earlier figures are now several years old, but all of them were valid for (or beyond) the 'baseline' period (2007 – 2016) covered by this Review. The Steering Group considered that these were the best available consistent source of data for this purpose, with the benefit of having been scrutinised by Inspectors at individual LDP Examinations.

A key factor in the new methodology has been recognition that these housing requirements, in all Local Authority areas in Wales, are more than double the average levels of house completions seen over the last 10 years, and that a corresponding increase in the planned provision of construction materials associated with house construction should therefore be allowed for. This is not necessarily a prediction of future demand, since the housing figures set out in adopted Development Plans will only materialise if economic conditions allow. There is, however, a clear logic in land use planning terms in linking the planned provision of aggregates with that for housing, to ensure that housing plans are not thwarted by an under-provision of aggregates.

Of course, housing accounts for only part of overall construction activity. At a national scale, however, Welsh statistics have revealed a very high degree of correlation between housing completions and aggregate sales. Other statistics (for Great Britain as a whole) show that housing accounts for approximately 30% by value of all new construction. Putting both of these observations together, the implication is that a doubling of house construction would

necessitate a doubling of that 30% element of aggregate sales. At a national level, therefore, and on the basis of being consistent in terms of planned provision for both housing and aggregates, the RTS Steering Group<sup>1</sup> agreed that the provision required for aggregates should be guided by a 30% uplift on historical sales figures.

A further consideration agreed by the Steering Group was that the historical sales figures should reflect, not just the 10-year average (as had been used in the First Review, and as required by the NPPF, in England), but the highest of the 10-year and 3-year averages for each individual LPA. This reflects the fact that in some parts of Wales – notably in the Cardiff City Region – there has been a marked upsurge in construction activity in recent years, and a corresponding growth in aggregate sales.

In **STAGE 1** of the RTS process, the 30% uplift is applied to this composite historical sales figure to obtain an overall **National Guideline** figure for future aggregate production. The uplift is applied only at the national level, because the relationship between construction activity and aggregate sales breaks down at more detailed levels (this being primarily because of the spatial differences between areas of supply and demand).

In **STAGE 2** of the process, the National figure is broken down into two **Regional Guideline** figures (based simply on the historical split of total land-won primary aggregate sales between North and South Wales, which has remained reasonably consistent over many years).

In **STAGE 3**, the regional figures are then apportioned between a series of seven '**sub-regions**', as shown below and, *provided that it is feasible to do so*, between each of the constituent Local Planning Authorities (LPAs). The sub-regions were created, at Welsh Government's suggestion, for the specific purpose of facilitating strategic minerals planning and collaborative approaches between LPAs. They each represent distinctive 'market areas' between which there is relatively little movement of aggregates, except for exports to England, and within which detailed, strategic consideration can be given as to the most appropriate patterns of supply.

In most cases, the distribution of apportionments within each sub-region is achieved through a combination of quantitative and qualitative judgements, exercised by the RTS Steering Group and facilitated by the appointed consultant. The judgements seek to reflect the Steering Group's collective understanding of market requirements (reflecting both historical sales and the distribution of planned housing activity) together with considerations of existing landbanks, the proximity principle and environmental capacity.

In the final **STAGE 4** of the process, the total apportionments for each LPA are separated into figures for sand & gravel and crushed rock production (based on historical sales proportions in each LPA). Those figures are then multiplied by the number of years required (22 years for sand & gravel, and 25 years for crushed rock) to obtain the total provision required, in millions of tonnes. Comparison of those figures with existing landbanks and existing unworked

---

<sup>1</sup> comprising Welsh Government, the two RAWP secretaries, National Resources Wales, the Mineral Products Association, the British Aggregates Association and representatives of one local authority from each Region.

allocations then determines the extent to which any new permissions and/or allocations for future working are required within each authority.

The outcome of this exercise has been a deliberate attempt to control, and in some cases to modify, the future pattern of supply of land-won primary aggregates in Wales, in line with sustainability principles. In a small number of areas, notably where there has been no production of land-won aggregates for many years, with no permitted reserves and zero apportionments, the Steering Group accepted that there may be insufficient evidence, at present, to determine the precise levels of apportionment and resulting allocations required for individual LPAs. In such cases, more detailed analysis will be required, at the local level, through collaboration between adjoining LPAs and consultation with industry, in order to confirm realistic figures for those particular LPAs and (*in exceptional circumstances*) to consider the possibility of alternative patterns of supply within the sub-region concerned.

To this end (and more generally, to ensure that the regional and sub-regional totals recommended by the RTS are achieved), this Review introduces a requirement for all LPAs within each sub-region to produce Statements of Sub-Regional Collaboration (SSRCs), in consultation with industry, through the RAWPs, prior to the Examination of any individual LDP within that area. Specific guidelines relating to the preparation of SSRCs, including details of the circumstances under which alternative patterns of supply may be justified, are provided at Annex A of this document.

More generally, it must be emphasised that the RTS recommendations are intended to be of a **strategic** nature. The recommendations do not provide site-specific information or guidance. It is for the individual LPAs to determine how the strategic requirements identified in the new RTS should be met within their areas. This includes identifying the size and location of new allocations (where these are required by the RTS or, in some cases, by other local factors), and setting out corresponding policies within their LDPs to guide the Development Management process for future mineral extraction.

Moreover, where it is justified by new (e.g. more up to date, more detailed or more precise) evidence, it is open for individual LPAs to depart from the apportionment and allocation figures recommended by the RTS when preparing their LDP policies. In doing so, however, an LPA would need to demonstrate that their intended departure would not undermine the overall strategy provided by the RTS itself (e.g. by working together with other LPAs within the same sub-region to ensure that sub-regional and regional totals are still achieved) and this would need to be reflected in the SSRC agreed with all other constituent LPAs within that sub-region, prior to Examination.

Where the local authorities involved are unable to reach agreement, or if individual local authorities do not accept the revised Regional Technical Statement, the Welsh Government will, as a last resort, consider its default powers to intervene in the Development Plan process (MTAN 1, paragraph A3).

# 1. The Purpose and Objectives of the RTS

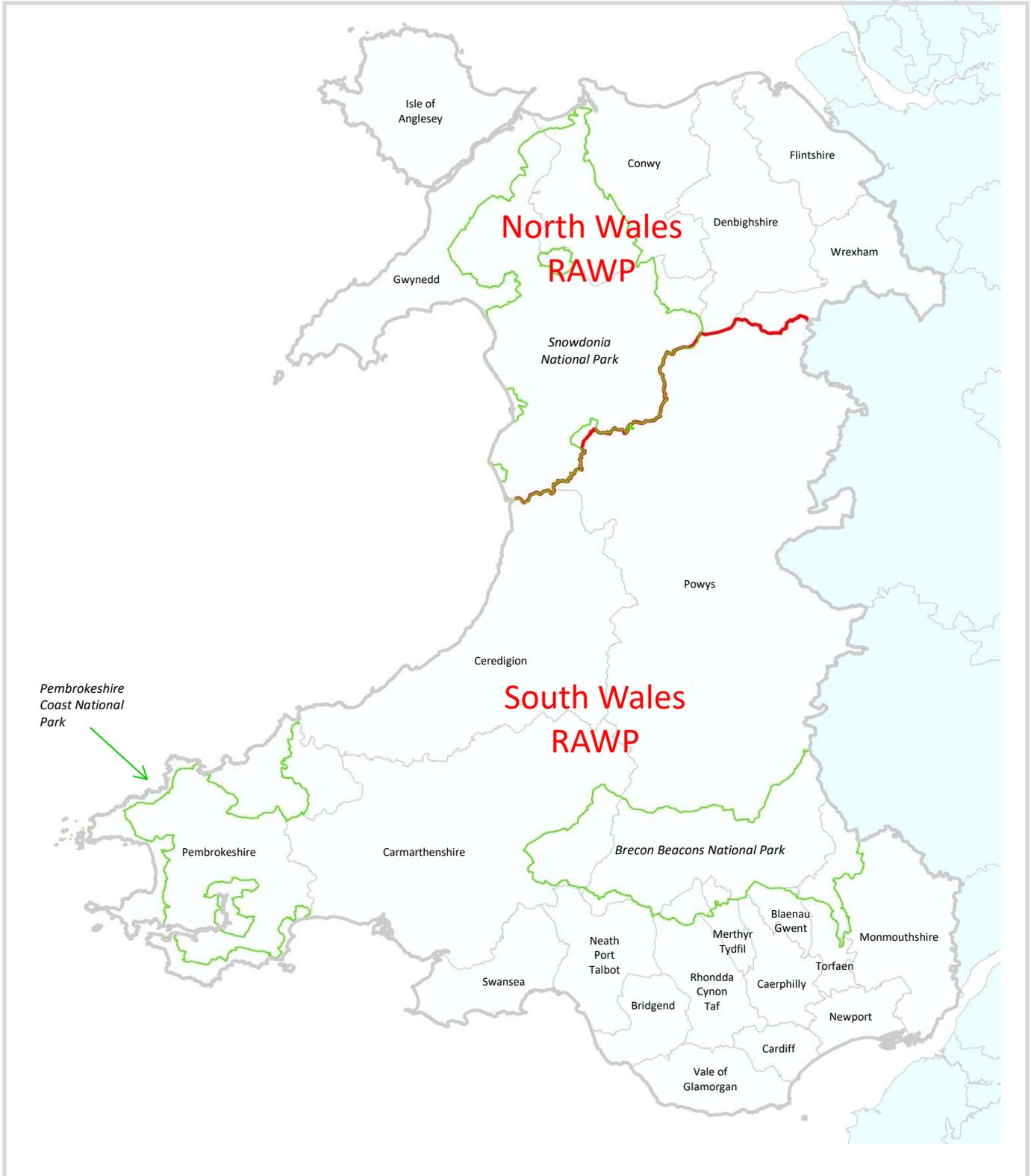
## *Introduction*

- 1.1 Minerals Technical Advice Note 1: Aggregates (2004) (MTAN 1) requires the preparation of Regional Technical Statements (RTS) for the areas covered by both the South Wales and North Wales Regional Aggregates Working Parties (RAWPs) – as shown in Figure 1.1, below. The original RTS documents for both regions were completed in 2008 and are required, by MTAN 1, to be reviewed every five years. The First Review was undertaken in 2013/2014 and this, the Second Review, commenced in 2018.
- 1.2 The Review comprises this main document and the Regional Appendices for North Wales and South Wales, which are issued separately. The two components of the new RTS for each Region (i.e. the main document and the relevant Appendix) are intended to provide a strategy for the future supply of construction aggregates within that Region, taking account of the latest available information regarding the balance of supply and demand, and current notions of sustainability (see below). Together, the two revised RTSs aim to ensure that an adequate and steady supply of aggregates can be maintained throughout Wales (and beyond, in the case of materials that are exported), taking into account the key objectives of sustainable supply outlined in MTAN 1.

## *Policy Context and Sustainability Objectives*

- 1.3 Since the First Review of the RTS was completed in 2014, there have been some important changes in National legislation and Policy within Wales which have a bearing on mineral development. MTAN 1 – and thus the requirement for Regional Technical Statements to be produced and periodically updated – remains extant, but the former Minerals Planning Policy Wales (MPPW) is now subsumed within Planning Policy Wales (PPW), which itself has been updated several times in response to changing legislation and other factors.
- 1.4 The most significant legislative change since 2014 has been the **Well-being of Future Generations (Wales) Act 2015**. This places a statutory duty on public bodies in Wales to consider sustainable development in their decision-making. Whilst sustainability has been at the heart of PPW since it was first published in 2002, the concept has been expanded so that it now incorporates, more explicitly, cultural heritage and well-being.
- 1.5 **Sustainable Development** (in Wales) is now defined, by the 2015 Act, as meaning: *“the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”*.
- 1.6 This is linked to the more traditional definition by the explanation that: *“Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs”*.

**Figure 1.1: The Distribution of Local Planning Authorities (LPAs) between the two Regional Aggregate Working Parties (RAWPs) in Wales**



- 1.7 The 2015 Act requires public bodies to set out plans as to how they will take decisions in order to meet seven well-being goals that are set out in law. These relate to **prosperity, resilience, health, equality, community cohesion, vibrant culture** (including a thriving Welsh language) and **global responsibility**.
- 1.8 The Act also outlines five ways of working which authorities need to demonstrate they have carried out in undertaking their sustainable development duty. These require consideration to be given to **long term** visions; the **prevention** of adverse impacts; the **integration** of policies to promote balanced decision-making; **collaboration** between public bodies and the private and third sectors; and the built-in **involvement** of the public and stakeholders in the planning system through statutory consultation and engagement. The Regional Technical Statements have always reflected all five of these ways of working, with the concepts of policy integration and collaborative working being enhanced further still in this Review.
- 1.9 In 2018, the Welsh Government updated **Planning Policy Wales** to assist in the delivery of the new act through the planning system. The latest version (Edition 10) was published in December 2018. This introduced five new Key Planning Principles linked variously to the five ways of working. One of these: **Making the Best Use of Resources**, is clearly of direct relevance to mineral planning and thus to the Regional Technical Statements. This principle is explicitly linked, in PPW, to the concept of maintaining a 'long-term' vision with regard to climate change, decarbonisation and the circular economy. The Proximity Principle, which plays an important role in the RTS methodology, is highlighted as a means of ensuring that problems are solved locally rather than passing them on to other places or future generations, and so that the use of land and other resources are sustainable in the long term.
- 1.10 The fifth key planning principle: **Maximising Environmental Protection and Limiting Environmental Impact** is also of direct relevance. This refers explicitly to the need for respecting environmental limits (thereby supporting the notion of Environmental Capacity as used within the RTS). It also highlights the importance of the precautionary principle in ensuring that cost-effective measures to prevent possibly serious environmental damage are not postponed just because of uncertainty regarding the seriousness of potential risks. Whilst this is not explicitly part of the RTS process, it may nevertheless have a bearing on the spatial planning of future allocations.
- 1.11 Specific **minerals planning policies** are now incorporated within PPW (in paragraphs 5.14.1 to 5.14.57), rather than being in the separate Minerals Planning Policy Wales document, as had previously been the case (before 2016). Although the sequence and structure of these policies has been modified, not least to embrace certain aspects of the cultural environment now included within the definition of sustainable development, there are no significant changes in policy requirements that have a bearing on the present Review.
- 1.12 In this regard it is worth noting that one change, which had been introduced in versions 8 and 9 of PPW, has been reversed in the latest edition. This relates to the treatment of Sites of Special Scientific Interest (SSSIs) and National Nature Reserves

(NNRs). In versions 8 and 9 of PPW, these areas were included, along with National Parks and Areas of Outstanding Natural Beauty, as locations where minerals development should not take place, save in exceptional circumstances (whereas previously, in MPPW, that had not been the case). Version 10 has reversed that change, so that SSSIs and NNRs are now included (along with SPAs, SACs and Ramsar sites) within para. 5.14.37, where the requirement is for proposals to be ‘carefully examined’, rather than in para. 5.14.35, which retains the ‘exceptional circumstances’ test. Had this not been reversed, it would have had major implications on the allocation of sites for future working – significantly reducing the scope for finding such sites in areas where the available geological resources are highly constrained.

- 1.13 Overall, the new PPW changes nothing with regard to the RTS process, other than reinforcing the principles which are already enshrined within it.
- 1.14 **The Environment (Wales) Act 2016** introduced the Sustainable Management of Natural Resources (SNMR) and set out a framework to achieve this as part decision-making. The main objective is to maintain and enhance the resilience of ecosystems and the benefits they provide.
- 1.15 The Act requires the Welsh Government to prepare, publish and implement a statutory **Natural Resources Policy** (NRP) setting out its priorities in relation to the sustainable management of natural resources, while Natural Resources Wales (NRW) is required to produce a ‘**State of Natural Resources Report**’ and to prepare ‘**Area Statements**’ to inform place-based action.
- 1.16 The NRP sets out three National Priorities, linked directly to achieving goals within the Well-being of Future Generations (Wales) Act. These are: **delivering nature-based solutions; increasing renewable energy and resource efficiency; and taking a place-based approach.**
- 1.17 The first of these focuses on maintaining and enhancing the ecosystem services derived from natural resources. As well as the more obvious biodiversity-related resources, these include services associated with both mineral extraction and the restoration of former mineral workings. Though not mentioned in the NRP, these are examined in detail in reports for Natural England and Defra on an ecosystems approach to long-term mineral planning in the Mendip Hills (Thompson & Birch 2009; Thompson *et al.* 2010). Ecosystem services have an important bearing on site-specific aspects of mineral development, though probably not at the more strategic regional level being considered within the RTS.
- 1.18 Minerals are more explicitly noted in relation to the second priority (resource efficiency), both in relation to the promotion of recycled and secondary aggregates and the optimal utilisation of primary aggregates. These imperatives are already enshrined within the minerals policies of PPW, however, and are therefore fully incorporated in the methodology for producing apportionments within the RTS.

- 1.19 The third priority – taking a place-based approach – can also be very applicable to mineral development (e.g. through community involvement in planning decisions and restoration proposals). By definition, however, this again is a site-specific issue and is not something which can be addressed at the wider strategic level of the RTS.
- 1.20 It is concluded that, as with the Well-being of Future Generations (Wales) Act 2015 and the revision of PPW, the Environment (Wales) Act 2016 appears to reinforce the principles already enshrined within the RTS process, without imposing any new or different requirements.
- 1.21 In line with those requirements, ***the overarching objective in planning for aggregates provision***, as set out in paragraph 7 of MTAN1 is “*to ensure supply is managed in a sustainable way so that the best balance between environmental, economic and social considerations is struck, while making sure that the environmental and amenity impacts of any necessary extraction are kept to a level that avoids causing demonstrable harm to interests of acknowledged importance*”.
- 1.22 Subsidiary objectives in paragraph 29 of MTAN1, which relate to delivering a more sustainable pattern of supply include:
- examining very carefully existing (permitted) reserves on a national and regional basis to see if they are adequate in the short, medium and long term;
  - only granting permission for future extraction to take place in the most environmentally acceptable locations, in accord with development plans that are informed by the Regional Technical Statement which in turn is based on the environmental capacity assessment;
  - actively reducing the proportion of primary aggregates used in relation to secondary, recycled or waste materials;
  - minimising the transportation of aggregates by road;
  - seeking self-sufficiency within regions, thereby avoiding the need to transfer the environmental costs of aggregates extraction to other areas; and
  - careful and continual assessment of existing and anticipated future exports of aggregates to areas outside Wales (in consultation with those importing regions outside Wales) to determine whether that supply is the best environmental and practicable option for all.
- 1.23 These various objectives, combined with the increased emphasis on collaborative, sub-regional working embedded within this 2<sup>nd</sup> Review, are fully in line with the Sustainable Management of Natural Resources principles enshrined within the Environment (Wales) Act 2016.

### ***The Scope and Purpose of RTS Recommendations***

- 1.24 Each RTS Review provides a mechanism for encouraging the national sustainability objectives relating to minerals to be met by the individual Local Planning Authorities (LPAs) within each Region over a period of up to 25 years (for crushed rock) or 22 years, in the case of land-based sand & gravel (sufficient to cover the MTAN1 requirements for maintaining minimum landbanks of 10 years and 7 years,

respectively, throughout the full 15-year term of each LDP). In the case of Cardiff, which has a 20-year Plan Period, these durations are increased to 30 years (for crushed rock) and 27 years for sand & gravel.

- 1.25 The RTS provides specific recommendations to the constituent LPAs regarding the quantities of aggregate which need to be supplied from each area (**apportionments**) and the nature and size of any **allocations** which may need to be made in their Local Development Plan (LDP) to ensure that adequate provision is maintained throughout the relevant Plan Period. In this Review, the basic recommendations are set out within this document with further details being given in the Regional Appendices.
- 1.26 Paragraph 50 of MTAN1 specifically requires the relevant parts of the RTS strategy (principally, the RTS apportionments and allocation requirements) to be incorporated into individual LDPs. In the present Review, however, apportionment figures are also identified for sub-regional groupings of LPAs and, in a small number of cases, the requirements for individual LPAs within those areas may need to be adjusted, subject to more detailed investigation by the LPAs involved and to industry responses to future calls for sites. Further details of the sub-regional groupings and the apportionment methodology are set out in Chapter Five of this Review.
- 1.27 *In exceptional circumstances*, sub-regional analysis may result in the possibility of alternative patterns of supply being considered within a particular sub-region. In order to facilitate this, and to ensure that the regional and sub-regional totals recommended by the RTS are achieved, this Review introduces a requirement for all LPAs within each sub-region to produce Statements of Sub-Regional Collaboration (SSRCs), in consultation with industry, prior to the Examination of any individual LDP within that area. Specific guidelines relating to the preparation of SSRCs, including of the circumstances under which alternative patterns of supply may be justified, are provided at Annex A of this document.
- 1.28 It must be emphasised that the RTS recommendations are intended to be of a **strategic** nature. The recommendations do not provide site-specific information or guidance. It is for the individual LPAs to determine how the strategic requirements identified in the new RTS should be met within their areas. This includes identifying the size and locations of new allocations (where these are required by the RTS or, in some cases, by other local factors), and setting out corresponding policies within their LDPs to guide the Development Management process for future mineral extraction.
- 1.29 Moreover, where it is justified by new (e.g. more up to date, more detailed or more precise) evidence, it is open for individual LPAs to depart from the apportionment and allocation figures recommended by the RTS when preparing their LDP policies. In doing so, however, an LPA would need to demonstrate that their intended departure would not undermine the overall strategy provided by the RTS itself (e.g. by working together with other LPAs within the same sub-region to ensure that sub-regional and regional totals are still achieved) and this would need to be reflected in

the SSRC agreed with all other constituent LPAS within that sub-region, prior to Examination.

- 1.30 MTAN 1, paragraph A3, notes that *“If the local authorities reach no agreement or if individual local authorities do not accept the Regional Technical Statement, the Welsh Assembly Government will consider its default powers to intervene in the planning process as a last resort”*.
- 1.31 For each Region, Sub-region and individual LPA, the RTS recommendations are informed by the analysis of:
- available resources, permitted reserves, sales and landbanks of primary land-won aggregates;
  - the availability and supply of marine, secondary and recycled materials;
  - levels of demand upon the region for the supply of aggregates, including exports;
  - levels of imports of aggregate into the region;
  - the proximity principle, in relation to the transportation of aggregates; and
  - the environmental capacity of areas to accept the impacts of future quarrying
- 1.32 Further details of the key principles and approaches used within this analysis are set out in the next chapter.

### ***Aims and Objectives of the RTS 2<sup>nd</sup> Review***

- 1.33 The Welsh Government’s **aims** of the 2nd Review have been:
- (i) to confirm or refine the existing methodology and update the current data/information inputs of the current RTS documents; and
  - (ii) to prepare new apportionments and an updated RTS for each RAWP region
- 1.34 These are precisely the same as the aims for the 1st Review.
- 1.35 The **guiding principles** for the review (changed only very slightly from those relating to the 1<sup>st</sup> Review) were identified by Welsh Government as follows:
- (i) *The RTS will be reviewed at 5-year intervals, in line with policy, with a second review to be completed in 2019. The plan period for each RTS will be 25/22 years;*
  - (ii) *To utilise data for the latest year for which information is available as baseline information for the purposes of the review;*
  - (iii) *To have regard to recent research which may identify any issues that need to be covered in the review;*
  - (iv) *The review itself needs to be transparent, engage appropriate stakeholders but recognise that the exercise is largely technical and aimed at providing*

*information and evidence to be utilised in planning processes and therefore consultation and governance should be proportionate,*

- (v) *The review will result in an updated statement for each region which is clear, concise and user friendly;*
- (vi) *Recognise that WG is supportive of collaboration between authorities in negotiating how need, as represented by RTS apportionments, is met, if appropriate;*
- (vii) *The reviews will not start from scratch but will build on the current RTS documents.*

1.36 In order to consider what further adjustments might be needed to the guiding principles and/or the methodology to be used, an RTS Technical Group was convened by the South Wales and North Wales RAWPs. Following internal consultation among RAWP members, the Group's final recommendations were as follows:

- 1) The **base year** for calculation of the apportionment and allocations should be the date of the latest year for which information is available;
- 2) The RTS 2nd Review should calculate the **3-year average** annual production figure and the **10-year average** annual production figure and use the higher of the two figures as the basis for apportionment calculations;
- 3) There should not be a separate landbank for **high PSV rock** but there should be a narrative included in the RTS setting out the considerations to be undertaken if high PSV rock is part of the crushed rock landbank in a particular MPA area;
- 4) Regarding the question of whether **regional groupings of LPAs** should be used for the calculation of landbanks, the Technical Group supported this in principle but considered that identifying appropriate regional groupings should be a task undertaken by an independent Consultant as part of the RTS Review process. The Consultant should also consider whether apportionment should be for a regional area only or whether this should be broken down to each LPA area;
- 5) Regarding the treatment of **ongoing quarrying activity within National Parks**, the Group considered that the position is adequately covered in National Policy. There should therefore be no change to the way in which production within National Parks is monitored and reported. This question specifically relates to current production. It does not relate to landbanks for National Parks as they are subject to the 'exceptional circumstances' test;
- 6) Regarding the issue of **maintaining production capacity** within a particular area, the Group resolved that the consultant appointed to produce the RTS should be asked to consider this for each LPA or region and to identify where there is a danger of under provision within the lifetime of the RTS 2<sup>nd</sup> Review, even though the apportionment figure may be met arithmetically.

- 1.37 Concern was also expressed by the Technical Group about the **potential impact of major projects** on landbanks and the ability of the quarrying industry in Wales to respond to these potential spikes in demand. It therefore advised that one of the considerations to be addressed in carrying out the 2<sup>nd</sup> Review is whether the apportionment calculations for each LPA or region need to be adjusted to reflect these major ‘spikes’ in demand and, if so, how that could be done.
- 1.38 The first of these recommendations is now embedded within the Guiding Principles note above. The second, third and fifth recommendations are also regarded as settled matters and form part of the methodology for the determination of apportionments and allocations within the 2<sup>nd</sup> Review. The fourth and sixth recommendations, together with the additional concern regarding major projects, noted above, were discussed at a series of Stakeholder meetings in Stage 1 of the Review, and are incorporated in the adopted methodology.
- 1.39 Whether or not **Strategic Environmental Assessment** (SEA) should be undertaken was considered as part of the original development of the Regional Technical Statements. It was felt, however that, as the RTS documents primarily represent a collaboratively prepared evidence base and are neither required nor constitute a plan or programme for the purposes of the SEA Directive, such an assessment was not necessary. As with the original RTS documents and the First Review, therefore, at this broad level, and given the further detailed analysis and Plan-making that will be required to implement the RTS through Local Development Plans (where SEA is a formal requirement), it was not considered appropriate or required that SEA should be conducted as part of the Second Review.
- 1.40 Several of the terms used above (e.g. apportionments, allocations, landbanks, permitted reserves and resources) have very specific meanings with respect to minerals planning, which need to be understood. These are all defined in the **Glossary of Terms** at the back of this report. Similarly, a number of commonly-used abbreviations, although explained in the text where they are first introduced, are summarised in the list which follows the glossary.

## 2. Key Principles

### *The RTS Approach*

- 2.1 A key principle which underpins the overall approach within the RTS and MTAN1 is the need to move away from the old, demand-led system of '**Predict and Provide**' to the more modern concept of '**Plan, Monitor and Manage**'. These terms originated in relation to the planning for housing provision but can also be applied to minerals.
- 2.2 It is important to recognise, however, that the Plan, Monitor and Manage system still depends, crucially, on an assessment of demand. At the heart of MTAN1 is the aspiration that, once a reasonable estimate of demand has been obtained, any subsequent fluctuations above that level should be accommodated by increased supplies from secondary and recycled sources (see glossary for definitions), rather than being seen as a justification for granting new planning permissions for primary aggregate extraction. Whilst that aspiration is widely supported, there is evidence to suggest that the percentage contribution available from secondary and recycled sources, having risen from around 10% of the total aggregates market in the 1990s to around 28% during the last decade (as a direct result of financial incentives and promotional work to increase acceptability) is now likely to have peaked. As a consequence of this, the future use of recycled/secondary materials is likely to depend mainly on the level of future construction output (since the availability of recycled materials is closely dependent on rates of new construction). It is therefore perhaps more reasonable to assume that secondary and recycled aggregates will continue to provide a high proportion of total aggregate production but will not be able to be relied upon to fulfil any future peaks in demand on their own: there may also need to be increased contributions from primary aggregate sources.
- 2.3 The RTS process supports this approach by investigating the likely continued availability of secondary and recycled aggregates from all available sources within each area, and factoring this in to an assessment of the residual demand for land-won primary aggregates, as informed primarily by historical sales data and the consideration of planned future construction activity. That residual level of demand is then translated into **apportionments** for each local authority, subject to the consideration of other sustainability issues including proximity and environmental capacity (see below).
- 2.4 An important tool in the ongoing management of the supply of aggregates is the monitoring of **landbanks**. A landbank, as defined in paragraph 45 of MTAN1, is the stock of planning permissions for the winning and working of minerals at *active* and *inactive* sites<sup>2</sup>, at any given point in time and for a given area. Where there is an insufficient landbank of permitted reserves in a particular area to meet the identified demand, over a sustained period of time, the RTS recommends the need for **allocations** for future working to be identified in LDPs. Provided that the

---

<sup>2</sup> Detailed definitions of active, inactive, dormant and suspended sites are given in the **Glossary of Terms** at the back of this report, as are the full definitions of resources, permitted reserves, apportionments, landbanks, allocations and provision.

reserves at *dormant* sites have not already been included in the landbank calculations<sup>3</sup>, and where a Local Planning Authority considers that such reserves are likely to be capable of being worked within the relevant period (subject to the agreement of modern conditions) it is suggested here that these may be offset against the requirement for new allocations. The same logic applies to sites where permission has been *suspended*, following a stalled IDO or ROMP review (see **Glossary** for full explanations of these various terms).

- 2.5 Thereafter, by virtue of the Plan-led approach, additional applications for new permitted reserves are unlikely to be granted except within allocated sites or areas, unless there are compelling reasons why fluctuations in demand cannot be met from those locations or from alternative (secondary and recycled) sources. The situation is monitored annually by the RAWPs and managed, as required, through periodic (5-yearly) revisions of the Regional Technical Statements.
- 2.6 In terms of its overall approach, the RTS concept represents an important modification of the more general Managed Aggregate Supply System (MASS) which had previously operated across both England & Wales for many years. The main difference is that the Welsh system explicitly seeks to incorporate two key principles of sustainability with respect to aggregates supply: the ***proximity principle*** and the notion of ***environmental capacity***, as explained in the following sections.

### ***The Proximity Principle***

- 2.7 This relates simply to the objective of minimising unnecessary transportation of bulk materials, particularly by road, by ensuring that sources of supply (e.g. aggregate quarries) are located as closely as possible to the main centres of demand (primarily centres of population and major infrastructure projects). The minerals planning system has only limited controls on this: it cannot dictate where aggregates are supplied to, from any given source, and it cannot dictate where suitable sources exist (since minerals can only be worked where they are found). The planning system can, however, provide strong guidance in terms of where planning permissions are likely to be given for new quarries (or extensions to existing quarries) within areas of suitable geology, and it can take account of transportation factors in deciding where these ought to be. In the long term the RTS process has a key role to play in this, by gradually modifying the overall pattern of supply, where this is needed.
- 2.8 The proximity principle needs to be modified, in some cases, by recognition that certain types of ‘high specification aggregate’ (HSA) serve quite different markets and are therefore required for distribution over much greater distances. This applies especially to the skid-resistant aggregates derived from the Pennant Sandstones of South Wales and from a range of other formations within Powys and elsewhere, which are essential for road surfacing applications throughout England and Wales (Thompson, Greig & Shaw, 1993; Thompson *et al.*, 2004). Indigenous sources of HSA

---

<sup>3</sup> There are differences of interpretation (of MTAN1 guidance) regarding whether or not the permitted reserves at dormant sites should be included in landbank calculations that are used for the purpose of assessing the need, or otherwise, for new allocations. As explained in the **Glossary**, for the purposes of this review, such reserves, and those at suspended sites, have been excluded.

materials within England are very limited, and many are constrained by their location within National Parks. HSA exports from Wales are therefore of major significance. Separate consideration also needs to be given to the issue of high purity limestone production for use as a metallurgical flux, for chemical production and for the manufacture of cement. Whilst these are all non-aggregate end-uses, they are frequently produced from the same geological resources as crushed rock aggregates, but the quarry locations may be determined or justified primarily by the requirements for the higher value industrial products.

- 2.9 The proximity principle is further modified by the requirement in MTAN 1 (paragraph 49) that landbanks do not need to be maintained, and that there should therefore be no future allocations, within National Parks or Areas of Outstanding Natural Beauty (AONBs). This is in line with Planning Policy Wales, which states (at para. 5.14.35) that mineral extraction should not take place in National Parks and AONBs, except in very exceptional circumstances.
- 2.10 The original Regional Technical Statements aimed to reflect the Proximity Principle by providing ‘per capita’ apportionments for future aggregate provision (i.e. proportionate to the population within a given LPA area, as a surrogate for the likely distribution of demand). Major drawbacks of this approach, however, were found to be the lack of correlation between existing population figures and either the demand for, or availability of, aggregate supplies.
- 2.11 In the 1<sup>st</sup> Review of the RTSs, general consideration was given, instead, to variations in *population density*, but account was also taken of a range of other influences, including access routes and transport distances, which neither population nor population density figures are able to reflect. That analysis was, necessarily, of a qualitative nature because of the complexities involved, and to avoid the spurious precision associated with inappropriate quantitative analysis. It allowed the Proximity Principle to be acknowledged but relied primarily on historical sales figures as indicators of demand. This recognised that the demand for supplies from a particular quarry must inevitably be influenced (very strongly) by transport distances, since these constitute a major element of the delivered price. Local sources of supply will therefore always be preferred to those from more distant locations, provided that the material supplied is fit for purpose. Equally, more remote sources would only maintain their commercial viability if they are capable of supplying aggregates of a type that are in high demand but not available from sources located nearer to the markets.
- 2.12 The main criticism of that approach has been that reliance on historical sales figures inevitably perpetuates the historical pattern of supply, giving very limited scope for this to be changed, over time, to achieve any improvement in sustainability. In the present Review, an attempt has therefore been made to use recent data on housing completions and planned future housing provision, both as part of the overall assessment of future demand, and to influence the sub-regional apportionment of future aggregates provision. This is explained more fully in Chapter 3.

### ***Environmental Capacity***

- 2.13 By comparison, the notion of environmental capacity has always been a more controversial issue. The basic principle is clear enough: i.e. that quarrying should be focused, as far as possible, on areas which have the greatest capacity to ‘absorb’ the environmental impacts that are (or may be) associated with quarrying activity, and thus to contribute to future supply with a minimum of adverse impacts. The controversy derives from the lack of consensus in terms of how ‘environmental capacity’ should be defined, and from the way in which this has influenced the allocation targets within the Regional Technical Statements.
- 2.14 In Wales, two previous research projects provided the evidence base for the system that is currently used: **EMAADS** (Establishing a Methodology for Assessing Aggregates Demand and Supply - Arup, 2004) and **IMAECA** (Implementing the Methodology for Assessing the Environmental Capacity for primary Aggregates - Enviro, 2005). These projects resulted in a set of ‘traffic light’ maps (as they are often referred to) being issued to each LPA within Wales to indicate areas of *relatively* high (green), medium (amber) and *relatively* low (red) environmental capacity. The thresholds between these categories were arbitrarily set, but the differentiation between them does at least provide a starting point for the consideration of environmental capacity and thereby enables nationally consistent *strategic* decisions to be made, by the RAWPs, with respect to future aggregates provision.
- 2.15 The colours shown on these maps reflect combined scores from the assessment of twelve different ‘national environmental indicators’ for each square kilometre. These comprised:
- (i) Settlements
  - (ii) Roads
  - (iii) Land Use
  - (iv) SSSIs
  - (v) Heritage
  - (vi) Public Enjoyment
  - (vii) Landscape
  - (viii) Local Landscape
  - (ix) Watercourses
  - (x) Spheres of Influence
  - (xi) Existing Workings
  - (xii) Cumulative Effects
- 2.16 It is important to understand that the IMAECA tool was designed to be used *only* to inform the Regional Technical Statements and explicitly *not* to be used directly in Local Development Plans, Development Management processes and decisions or planning appeal decisions.

- 2.17 The consideration of Environmental Capacity at this strategic level deliberately avoids the direct use of more detailed ‘primary’ environmental information such as the locations of individual designations (other than National Parks and AONBs). Once again, this is to avoid being site-specific and to avoid prejudging issues which need to be addressed in more detail through LDP and Development Management processes at a local level - either within individual local authorities and/or through joint working between neighbouring authorities. Joint consideration of the relationship between mineral resources and environmental designations on a sub-regional basis would potentially allow more detailed consideration to be given to these important issues at a spatial scale which extends beyond the boundaries of an individual local authority. This could tie-in well with the Area-Based Natural Resource Management Approach being promoted by Welsh Government through the **Environment (Wales) Act 2016**.
- 2.18 However, despite this information being available, and being described for each LPA within the original RTSs, the environmental capacity results from the IMAECA study had no influence at all on setting the apportionment figures within those reports. That may partially have been due to concerns about not prejudging matters that should properly fall to be dealt with through the Local Development Plan process. This certainly applies to any site-specific judgements but, at a more strategic level, there is both scope and wide support for environmental capacity data to inform and potentially influence the bigger picture.

### ***Changing the Pattern of Supply***

- 2.19 Important consideration also needs to be given to existing patterns of supply. MTAN 1 suggests that these patterns are largely a historical residual and ‘...*will need to gradually change to reflect current notions of sustainability*’. That may, or may not be the case, however, since the historical supply patterns already have much to commend them: they reflect the ***spatial distribution of available resources*** (which is of fundamental importance, since minerals can only be worked where they are found) and the ***economic imperative*** of industry to establish quarries as close as possible to areas of demand (in order to minimise transport costs), subject to a range of environmental designations, planning policies and other constraints. Over many decades, quarries which have become uneconomic because of changing demand or outdated transport networks and rising costs have naturally fallen into disuse. Those which remain are generally (though not always) well-placed to serve the current markets although some remain in conflict with designations, environmental concerns or neighbouring land uses which, in many cases, post-date the mineral planning permissions involved. Where this is the case then, unless there are no sensible alternatives in terms of the availability of resources, it may not be appropriate for the historical supply pattern from a given area to be used as a proxy for future supply from that area.
- 2.20 Together, the implementation of the proximity principle and the notion of environmental capacity, as described above, may gradually induce changes to the existing patterns of supply. But this would only be justified if it is found that, once all aspects of sustainability are taken into account, alternative patterns are seen to

have clear advantages over those which currently exist. Even where changes are clearly justified, these cannot generally be immediately implemented, since (unless Prohibition Orders are issued) existing quarries will be able to continue until their existing planning permissions expire and/or until they run out of permitted reserves.

- 2.21 Nevertheless, the RTS can help to influence future changes in supply pattern, where this is found to be desirable, by adjusting the apportionments given to individual LPAs. This, in turn, will then help to focus new allocations in the areas required, and should eventually result in a shift towards a more sustainable pattern of supply. Chapter 4 of this report presents an overview of the existing supply pattern, highlighting the need for limited adjustments in certain areas, drawing on the more detailed analyses presented in the two Regional Appendices (A and B).

### 3. Methodology for the 2<sup>nd</sup> Review of the RTS

#### *Introduction*

- 3.1 In the original and First Review of the Regional Technical Statements, the starting point for the apportionment of future aggregates provision<sup>4</sup> was to make an assessment of the likely future demand. However, in contrast with the former guidelines for aggregate provision issued for both England and Wales, prior to devolution, the RTS process has always avoided any attempt to make detailed forecasts of future demand based on econometric modelling. In the past, these had been found to be unreliable and were criticised for their lack of transparency. Instead, a series of alternative approaches have been used in Wales and each 5-yearly review of the RTS provides opportunities for further refinement.
- 3.2 The methodology used in the previous (First) Review, in 2014, had been based primarily on historical sales averages, combined with an assessment of the various ‘drivers’ of potential future change – much like the methodology for producing Local Aggregate Assessments in England, but carried out at a national scale. For the present Review, this has been combined with an attempt to reflect planned future requirements for construction activity (particularly housing)<sup>5</sup>, and to avoid perpetuating historical supply patterns in areas where there is scope to encourage more sustainable patterns of supply.
- 3.3 Given the importance of the Plan-led system, there is a need for joined-up thinking between planned construction activity and the planned provision of associated construction materials. This resonates strongly with the integration of policies to promote balanced decision-making: one of the five key ways of working identified in the Well-being of Future Generations (Wales) Act 2015. The concept applies irrespective of whether the planned construction (e.g. housing or major infrastructure projects) materialises. If the planned activity *does* take place, then it will not be hampered by a shortage of materials; if it does not, then there will have been an over-provision of aggregates, but that would not equate to excess production (since aggregates will only be quarried as and when the demand occurs).

#### *Preliminary Research*

- 3.4 In developing the methodology to be applied in the 2<sup>nd</sup> Review, it was first necessary to undertake some preliminary analysis of the source data. This is briefly outlined below under five headings: historical sales data, housing data, economic forecasts, availability of alternative materials and the balance between imports and exports.

---

<sup>4</sup> This analysis relates only to the requirements for primary, land-won aggregates. As noted in the original RTS documents, targets for the production of alternative aggregates (i.e. secondary aggregates, recycled materials and marine-dredged aggregates) have traditionally been ‘top-sliced’, leaving a residual demand for land-won primary aggregates. As with the First Review, it was agreed with the Steering Group that the proportion of total aggregates supply provided from secondary and recycled aggregate sources would remain approximately constant, with the actual quantities rising and falling in relation to overall levels of economic activity.

<sup>5</sup> Although planned housing construction may be no more reliable, as an indicator of future demand, than the former aggregate guidelines were, the justification for using such figures is different: it is not an attempt to predict demand, only to ensure consistency in the planning process and to give tangible recognition to the link between construction and aggregates.

Historical Sales Data

- 3.5 The Annual Reports of the South Wales and North Wales Regional Aggregate Working Parties provide an important source of data regarding annual sales and annual updates to the stock of permitted reserves of land-won primary aggregates. They also provide information on secondary aggregates and on landings of marine-dredged aggregates.
- 3.6 The published reports for South Wales currently provide data up to the end of 2016. Those for North Wales provide data up to 2015 but, for the purpose of this Review, the previously published figures have been refined and updated (to include 2016), by the RAWP secretary. The resulting annual totals for the period 2007 to 2016 are presented in Table 3.1, below. This represents the main 'baseline' period for use in the Second Review. All figures are given in millions of tonnes (mt).

**Table 3.1: Annual Sales of Land-won Primary Aggregate in North Wales and South Wales, from RAWP reports.**

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
North Wales Crushed Rock (mt)	6.298	6.225	3.674	4.381	4.348	3.938	4.052	4.626	5.003	5.023
North Wales Land-won Sand & Gravel (mt)	1.063	0.711	0.599	0.664	0.641	0.588	0.529	0.892	0.940	0.726
<b>NW Total (mt)</b>	<b>7.361</b>	<b>6.936</b>	<b>4.273</b>	<b>5.045</b>	<b>4.989</b>	<b>4.526</b>	<b>4.581</b>	<b>5.518</b>	<b>5.943</b>	<b>5.749</b>
South Wales Crushed Rock (mt)	12.51	10.35	8.13	7.20	7.73	7.39	7.55	7.87	8.31	8.41
South Wales Land-won Sand & Gravel (mt)	0.24	0.03	0.14	0.12	0.11	0.27	0.28	0.20	0.27	0.16
<b>SW Total (mt)</b>	<b>12.75</b>	<b>10.38</b>	<b>8.28</b>	<b>7.32</b>	<b>7.84</b>	<b>7.66</b>	<b>7.83</b>	<b>8.07</b>	<b>8.58</b>	<b>8.57</b>
<b>Wales Total (mt)</b>	<b>20.11</b>	<b>17.32</b>	<b>12.54</b>	<b>12.37</b>	<b>12.83</b>	<b>12.19</b>	<b>12.41</b>	<b>13.59</b>	<b>14.52</b>	<b>14.32</b>
NW/SW Split (%)	37/63	40/60	34/66	41/59	39/61	37/63	37/63	40/60	41/59	40/60

SOURCE: Annual RAWP reports, updated (for North Wales) by the RAWP Secretary, for the purposes of this review<sup>6</sup>.

- 3.7 It is important to remember that the historical sales figures represent only the *residual demand* for land-won primary aggregates, since the overall demand over this period was also satisfied, to varying degrees, by supplies from secondary, recycled and marine aggregate sources, as well as by small amounts of imports from primary aggregate sources in England. By default, therefore, using historical sales data as part of the basis for estimating future demand assumes that the supply of secondary, recycled, marine and imported aggregates will continue as before (with different levels of contribution from each source in each of the various LPAs).

<sup>6</sup> Whilst the data presented in Table 3.1 are useful in showing the year-to-year variations, the totals are slightly different from those presented in all subsequent tables in this report, which were derived from new, and more accurate figures collated by both RAWP secretaries for the specific purpose of this review.

- 3.8 In the First Review, historical sales data were represented by the average sales over the preceding 10-year baseline period. For the present Review, it was decided that consideration should also be given to average sales over the most recent 3-year period (2014 to 2016), in recognition of the fact that for some areas (notably Cardiff, and the three main 'exporting' LPAs of Flintshire, Wrexham and Powys), there has been a sharp increase in recent production. The RTS Steering Group's view was that the highest of the 10-year and 3-year averages, for each LPA, should be used in calculating a more representative National total. Table 3.2, below, presents the figures for each LPA and the derived total. The LPAs are listed simply in alphabetical. Their geographical distribution and arrangement into the North Wales and South Wales RAWP areas, are shown in Figure 1.1, above.

**Table 3.2: 10-year and 3-year Total Land-Won Primary Aggregates Sales Averages (to 2016) for each LPA.**

<b>Unitary Authority</b>	<b>10-yr Average Aggregate Sales (total) (mtpa)</b>	<b>3-yr Average Aggregate Sales (total) (mtpa)</b>	<b>Highest of 3-yr and 10-yr ave. sales in each LPA (mtpa)</b>
Blaenau Gwent	0.170	0.180	0.180
Brecon Beacons National Park	0.490	0.540	0.540
Bridgend	0.580	0.600	0.600
Caerphilly	0.390	0.100	0.390
Cardiff	0.830	1.060	1.060
Carmarthenshire	0.832	0.821	0.832
Ceredigion	0.300	0.240	0.300
Conwy + Snowdonia NP	0.955	0.813	0.955
Denbighshire	0.329	0.043	0.329
Flintshire	2.663	3.204	3.204
Gwynedd	0.868	0.898	0.898
Isle of Anglesey	0.236	0.255	0.255
Merthyr Tydfil	0.150	0.010	0.150
Monmouthshire	0.070	0.060	0.070
Neath Port Talbot	0.460	0.300	0.460
Newport	0.000	0.000	0.000
Pembrokeshire	0.510	0.360	0.510
Pembrokeshire Coast NP	0.330	0.270	0.330
Powys	2.470	2.650	2.650
Rhonda Cynon Taf	0.610	0.670	0.670
Swansea	0.000	0.000	0.000
Torfaen	0.000	0.000	0.000
Vale of Glamorgan	0.660	0.580	0.660
Wrexham	0.435	0.514	0.514
<b>TOTAL, Wales</b>			<b>15.557</b>

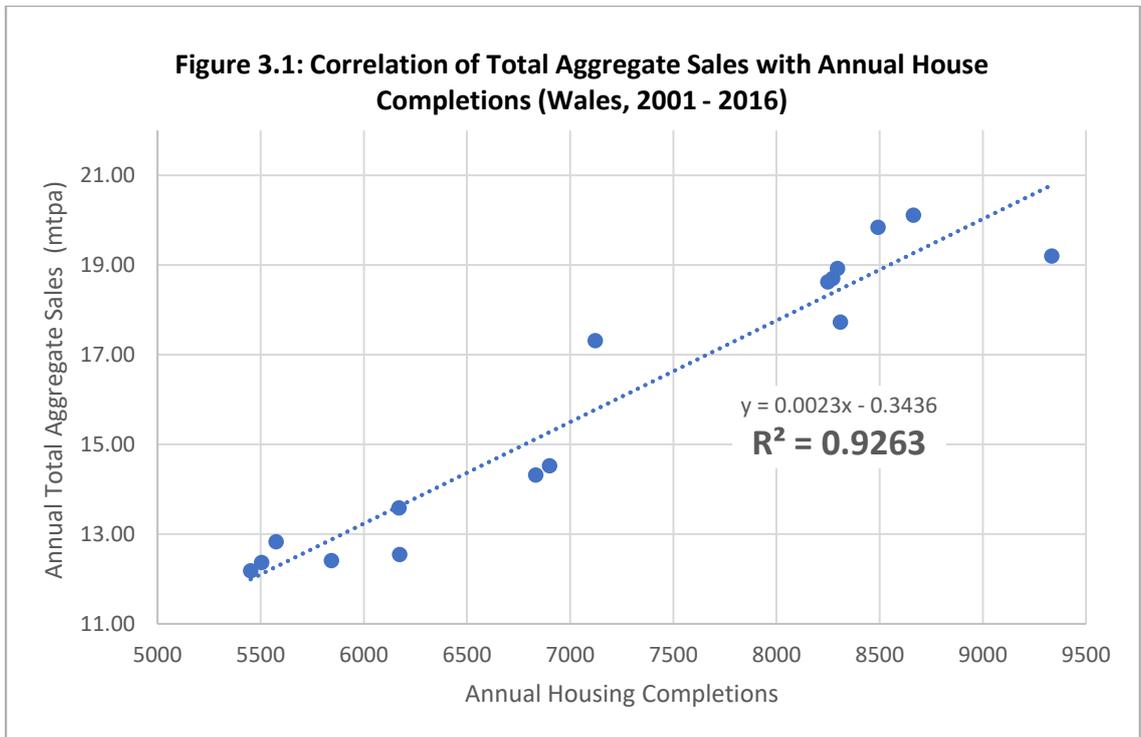
(SOURCE: RAWP Secretaries, 2018)

- 3.9 This National total of 15.557mt compares with an equivalent figure of 17.69 mt for the First Review (based on the 10-year average, only, for the period 2001 to 2010).

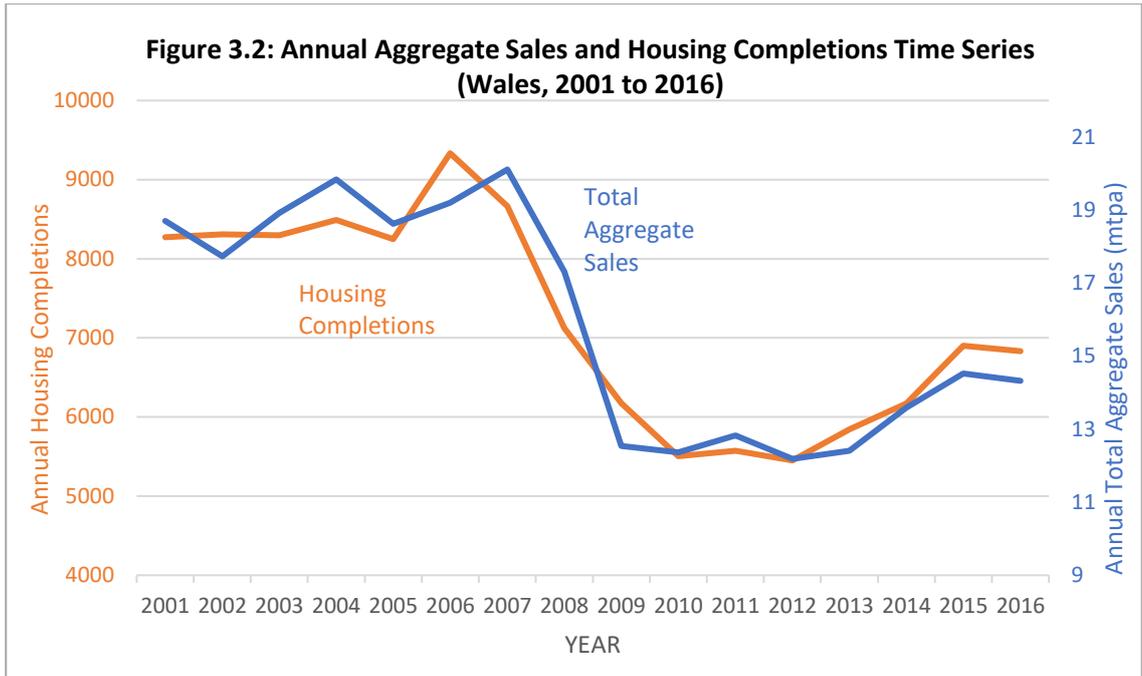
This marked reduction reflects the fact that the baseline for the present Review includes the whole of the recent economic recession, whereas the previous baseline period incorporated only part of the recession together with a preceding period of significantly higher sales.

Housing Data

- 3.10 Statistics on housing completions (and housing starts) for each LPA in Wales are reported on the Welsh Government’s ‘StatsWales’ website<sup>7</sup>. The data are reported in financial, rather than calendar years, so are not directly compatible with aggregate sales data, but comparisons over time can nevertheless reveal important trends. In doing so, two particular findings clearly emerged.
- 3.11 Firstly, an extremely high degree of correlation was revealed, at a national level, between annual house completions and annual sales of aggregates, with a correlation coefficient ( $R^2$ ) of 0.9236. This is illustrated in Figure 3.1 below. The two time series are compared in Figure 3.2, demonstrating their very close similarity of responses to the recent sharp recession and subsequent faltering recovery.



<sup>7</sup> <https://statswales.gov.wales/Catalogue/Housing/New-House-Building/newdwellingscompleted-by-area-dwellingtype-numberofbedrooms>



- 3.12 In considering the correlation shown in these diagrams, it is important to note that, whilst there is obviously a causal link between house building and aggregate consumption, the apparent strength of that correlation may be at least partly explained by the fact that both factors are governed by a separate, completely independent variable – that of economic growth.
- 3.13 It must also be recognised that housing accounts, directly, for only a proportion of aggregate sales. A projection of future housing growth (or decline), however reliable, could not be used with any confidence to predict the exact growth or decline of aggregate sales (at most it could only help to predict the proportion of those sales which are directly associated with house construction).
- 3.14 Similar analyses at regional and sub-regional levels were attempted but produced much weaker correlations – particularly in areas where a significant proportion of demand is associated with exports to England, rather than with domestic construction activity (as is the case in north-east Wales, for example, and in Powys).
- 3.15 The second observation relates to the comparison between annualised figures for future housing requirements<sup>8</sup>, derived from the totals set out in adopted Local Development Plans throughout Wales, and actual housing completions data over the 10-year baseline period, as recorded by the Welsh Government. This comparison is presented in Table 3.3. below, with the LPAs again listed in alphabetical order.

<sup>8</sup> The data used here relates specifically to housing **requirements**, as objectively assessed for each LPA, rather than the figures for housing **provision** adopted in LDPs which are usually higher, following the inclusion of variable allowances in each LPA for ‘flexibility’. The requirement figures were agreed, at a meeting of the two RAWPs, in July 2019, to be a more reliable basis for analysis. Given that LDP progress has varied from one authority to another, some of the earlier figures are now several years old, but all of them were valid for (or beyond) the ‘baseline’ period (2007 – 2016) covered by this Review. The Steering Group considered that these were the best available, consistent source of data for this purpose, with the benefit of having been scrutinised by Inspectors at individual LDP Examinations.

**Table 3.3: Comparison of Housing Requirements in Local Development Plans with average Annual Housing Completions in Wales (as of December 2018)**

Unitary Authority	Plan Status	Plan period	Planned Future Housing Requirements	Annualised Future Housing Requirements	Average House Completions per year (2008 – 2017)
Blaenau Gwent	Adopted	2006-2021	3,500	233	99.1
Bridgend	Adopted	2006-2021	9,690	646	365
Caerphilly	Adopted	2006-2021	8,625	575	335.2
Cardiff	Adopted	2006-2026 <sup>9</sup>	41,415	2,761	825.3
Carmarthenshire	Adopted	2006-2021	15,197	1,013	517.8
Ceredigion	Adopted	2007-2022	6,000	400	126.1
Conwy	Adopted	2007-2022	6,520	435	178.6
Snowdonia	Adopted	2016-2031	770	51	
Denbighshire	Adopted	2006-2021	7,500	500	156.2
Flintshire	in Progress	2015-2030	6,950	463	288.6
Gwynedd	Joint LDP Adopted	2011-2026	7,184	479	170.4
Isle of Anglesey					109.6
Merthyr Tydfil	Adopted	2006-2021	2,250	150	133.2
Brecon Beacons N.P.	Adopted	2007-2022	1,990	133	
Monmouthshire	Adopted	2011-2021	4,500	450	228.6
Neath Port Talbot	Adopted	2011-2026	7,800	520	274.3
Newport	Adopted	2011-2026	10,350	690	527.5
Pembrokeshire	Adopted	2006-2021	5,700	380	240
Pembrokeshire Coast NP	Adopted	2006-2021	1,599	107	
Powys	Adopted	2011-2026	4,500	300	191.7
Rhonda Cynon Taf	Adopted	2006-2021	14,385	959	373.9
Swansea	Adopted	2010-2025	15,600	1,040	519.4
Torfaen	Adopted	2006-2021	4,700	313	174.6
Vale of Glamorgan	Adopted	2011-2026	9,460	631	284.3
Wrexham	at Examination	2013-2028	7,750	517	304.2
<b>TOTAL, Wales</b>			<b>203,935</b>	<b>13,746</b>	<b>6,423.6</b>

3.16 It is evident from Table 3.3 that in every local authority, the levels of future housing requirements are substantially greater than recent levels of completion. For the country as a whole, the planned figures are more than double the average level of annual completions.

3.17 In reality, notwithstanding the fact that the housing figures have been scrutinised in terms of their 'deliverability' as part of the Local Plan process, and should therefore

<sup>9</sup> Although Cardiff's adopted LDP covers the period 2006 to 2026, work on the plan actually commenced in 2011 following withdrawal of the previous LDP (which covered the period 2006 to 2021). The start date remained at 2006 because much of the evidence base for the withdrawn plan was used to inform the new plan in order to avoid unnecessary expenditure in preparing new evidence where it was not required. This effectively means the plan is a 15-year plan (as for all others), expiring in 2026.

be ‘sound’, the planned delivery of new houses will only be achieved if economic and other conditions allow. The figures are therefore not predictions and cannot be used as a basis for predicting future demand.

- 3.18 There is, nevertheless, a clear logic behind the notion that levels of housing requirements that are accepted for inclusion in adopted LDPs should be underpinned by a planned sufficiency of construction aggregates. As noted in para. 3.3, above, this ties-in with, and is supported by, the notion of integrating policies to promote balanced decision-making: one of the five key ways of working identified in the Well-being of Future Generations (Wales) Act 2015. **A decision was therefore made to move away from any attempt to predict future demand and to focus, instead, on making sure that future aggregates provision is reasonably matched to the planned requirements for housing construction.**

#### Economic Forecasts

- 3.19 Notwithstanding that decision, it is still useful to give at least some consideration to established economic forecasts, since these may have a bearing on whether or not the planned construction activity is able to be delivered.
- 3.20 In the First Review, it was found that there was a degree of correlation between past aggregate sales and the annual change (% growth or decline) in **Gross Domestic Product** (GDP), as a measure of economic activity. GDP out-turn figures are readily available (on the Eurostat website) and GDP forecasts are published regularly in the Economic and Fiscal Outlook reports from the Office of Budget Responsibility. Table 3.4, below, compares land-won aggregate sales in Wales, over each of the last 16 years (again combining data for the last review period as well as this one), against published data on the annual percentage change in GDP for the UK.
- 3.21 The resulting graphs (Figures 3.3 and 3.4) reveal the a relatively limited degree of correlation between the two datasets and a noticeable disconnect between the speed of recovery of aggregate sales following the recession, compared with that of GDP growth. This may be at least partly because the GDP figures are available only for the UK as a whole, and not specifically for Wales. It is concluded that these offer very limited insight regarding future aggregate requirements in Wales, and that GDP data should not be used in the assessment of future requirements for aggregates provision.

#### Availability of Alternative Aggregates

- 3.22 In considering possible trends in the demand for land-won primary aggregates, consideration needs to be given to the availability of alternative (particularly secondary and recycled but also marine) aggregate sources. Such materials are ‘top sliced’ in terms of policy preferences, such that only the ‘residual’ demand needs to be supplied from primary, land-won materials.

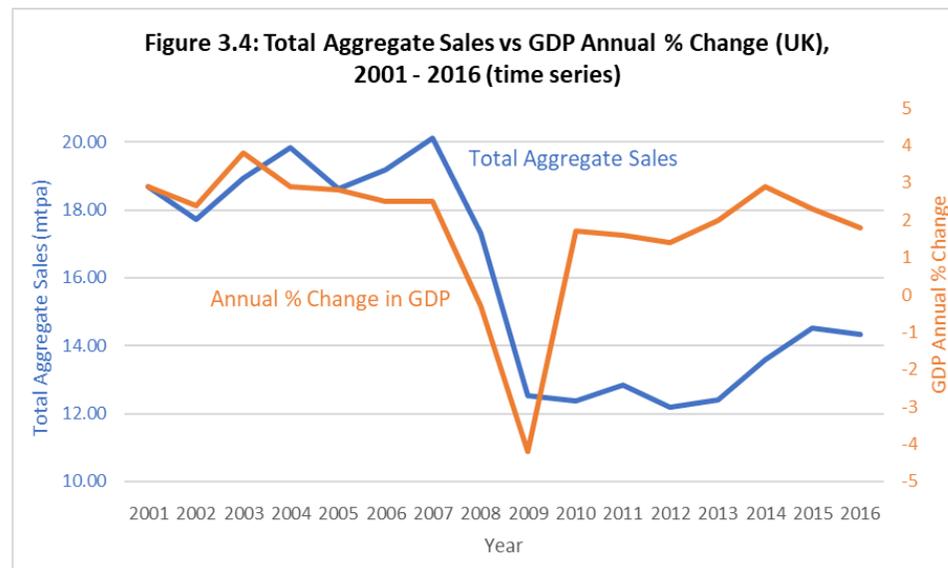
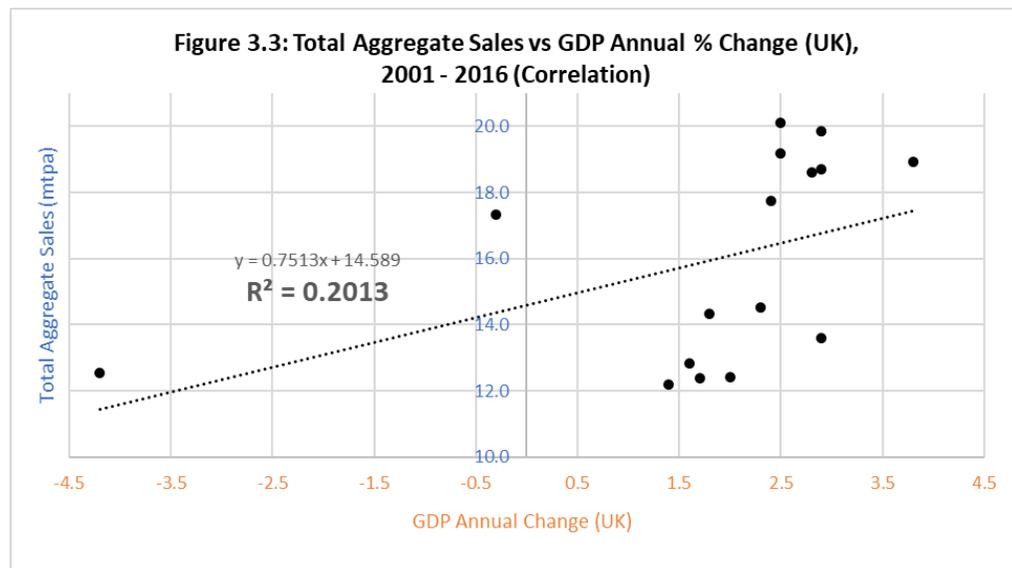
**Table 3.4: Annual Aggregate Sales and GDP Data.**

	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Crushed Rock * (mt)	16.97	16.18	17.46	18.30	16.95	17.75	18.81	16.58	11.8	11.58	12.08	11.33	11.6	12.5	13.31	13.43
Land-won Sand & Gravel * (mt)	1.73	1.55	1.47	1.54	1.68	1.45	1.3	0.74	0.74	0.78	0.75	0.86	0.81	1.09	1.21	0.89
<b>Total * (mt)</b>	<b>18.70</b>	<b>17.73</b>	<b>18.92</b>	<b>19.84</b>	<b>18.62</b>	<b>19.20</b>	<b>20.11</b>	<b>17.32</b>	<b>12.54</b>	<b>12.37</b>	<b>12.83</b>	<b>12.19</b>	<b>12.41</b>	<b>13.59</b>	<b>14.52</b>	<b>14.32</b>
GDP (UK) – Annual % change **	2.9	2.4	3.8	2.9	2.8	2.5	2.5	-0.3	-4.2	1.7	1.6	1.4	2	2.9	2.3	1.8

\* SOURCE: Annual RAWP reports, updated (for North Wales) by the RAWP Secretary, for the purposes of this review.

\*\* SOURCE: ([https://ec.europa.eu/eurostat/data/database?p\\_p\\_id=NavTreeporletprod\\_WAR\\_NavTreeporletprod\\_INSTANCE\\_nPqeVbPXRmWQ&p\\_p\\_lifecycle=0&p\\_p\\_state=normal&p\\_p\\_mode=view&p\\_p\\_col\\_id=column-2&p\\_p\\_col\\_pos=1&p\\_p\\_col\\_count=2](https://ec.europa.eu/eurostat/data/database?p_p_id=NavTreeporletprod_WAR_NavTreeporletprod_INSTANCE_nPqeVbPXRmWQ&p_p_lifecycle=0&p_p_state=normal&p_p_mode=view&p_p_col_id=column-2&p_p_col_pos=1&p_p_col_count=2))

Page 1025



### Secondary Aggregates

- 3.23 Secondary aggregates comprise the by-products of various industrial processes, including metallurgical slags and power station arisings, but also the by-products from certain types of non-aggregate mineral extraction, such as colliery spoil and slate waste, and from the recycling of glass, ceramics, asphalt planings and rail ballast<sup>10</sup>.
- 3.24 Aggregate production from metallurgical slags occurs only in South Wales. Port Talbot continues to produce both blast furnace (iron) and steel slag, whilst electric arc furnace steel slag is still produced from one site in Cardiff. The processing of older stockpiles of blast furnace slag at the former Llanwern steel works is now understood to have ceased. Secondary aggregates are produced from all of these materials although volumes are thought to be declining, with a consequent increase in the demand for primary aggregates.
- 3.25 Coal-fired power station arisings, comprising pulverised fuel ash (PFA) and furnace bottom ash (FBA) are currently produced only at the Aberthaw Power Station, in South Wales. With the planned closure of all coal-fired power stations by 2025, this production will cease. Whether or not historic PFA stockpiles will be able to be worked in future remains to be seen.
- 3.26 Small amounts of aggregate minerals (sandstone and occasionally sand) arise adventitiously from the reworking of former colliery spoil tips or from the working of opencast coal. The amounts and their suitability for use as construction aggregates are highly unpredictable, however, and quantities can vary greatly over time. Many former colliery waste tips in Wales have either been landscaped as part of reclamation schemes or utilised for base fill material. Volumes still available are very limited in North Wales but more significant in parts of the South Wales coalfield. The overall potential for producing aggregate from this material is considered to be small, for a combination of local, fiscal and regulatory reasons, but could be locally significant, particularly within Torfaen and Blaenau Gwent. Here, there may be opportunities for the material to make up for the very limited existing and potential sources of primary aggregate production, although the quality of the material and the quantities available for anything other than low grade fill, have yet to be demonstrated.
- 3.27 Sandstone arisings from new opencast workings have been important as ‘windfall’ resources at a number of sites within the South Wales coalfield, but these are classed as primary aggregates and are therefore not considered further here.
- 3.28 Crushed slate, derived either from slate waste (as a by-product of roofing material production) or quarried specifically for use as aggregate, features significantly in the overall pattern of supply with in North Wales (particularly in Gwynedd), but not in South Wales. Slate is included in the overall figures for crushed rock production

---

<sup>10</sup> it might appear more logical to group these recycled materials with aggregates produced from recycled construction, demolition and excavation wastes (CD&EW). However, the coverage of CD&EW is already well defined in terms of survey returns, so those items are included here as secondary aggregates.

within the North Wales RAWP reports though not in the AM Surveys. Although output fell during the recent recession, the proportions have remained high, suggesting an underlying increase in the market for slate aggregate. However, given that slate production is already included in the crushed rock statistics, this trend has no implications for the overall level of future demand for primary aggregates, only for the balance between slate and other types of crushed rock.

- 3.29 The various sources of secondary aggregate noted above, together with recycled aggregates, as discussed below, are currently exempt from the Aggregates Levy, in a deliberate attempt to minimise the use of primary aggregates. During 2019 and 2020, the Aggregates Levy was comprehensively reviewed by HMRC, but no changes have been made to those exemptions.

#### **Recycled Aggregates**

- 3.30 Aggregates produced from the recycling of construction, demolition and excavation wastes (CD&EW) form an important contribution to the overall supply of construction aggregates. The 2008 RTSs identified a total output for the whole of Wales of 3.97mt, based on 2005 survey data, and suggested a roughly 3 to 1 split between South Wales and North Wales, based on earlier surveys and population ratios. They also noted that, despite the lack of quantitative detail, it is inevitable that the greatest volumes of CD&EW arisings and usage are in the urban areas. The RTS documents emphasised, however, that all statistics for this sector need to be used with a high degree of caution, because of the low rate of response to the surveys.
- 3.31 The situation, in terms of available data, has not improved since the original RTSs were published. No new survey data is available, so any observations on recent or future trends can only be regarded as broad approximations. If anything, the efficiency of recycling is likely to have increased, and the introduction of WRAP's (2005) 'Quality Protocol' for the production of aggregates from inert waste may have increased the proportion and usage of higher value products derived from the various recycled sources. Such improvements, however, represent only small increments on the progress which had previously been made - primarily as a consequence of the price advantages resulting from the landfill tax and, to a lesser extent, the aggregates levy. The view of the Mineral Products Association (MPA), which is not disputed by the NRW, remains that there is little opportunity for significant further increase in the proportion of construction aggregate likely to be derived from this sector. As noted earlier, the future availability of recycled aggregates seems likely to be inextricably linked to the overall rates of construction activity and economic growth, so the safest assumption is that it will rise and fall in a very similar way to overall demand, and will thus have a neutral impact on the demand for primary aggregates, compared to the baseline period (2007 to 2016).

#### **Marine-dredged Aggregates**

- 3.32 Marine-dredged aggregates are of major importance in South Wales, with supplies being sourced from the Severn Estuary and the Bristol Channel, but are of very limited importance in North Wales. In south east Wales, marine-dredged material

accounted for 100% of all sand & gravel production over the baseline period (2007 to 2016), reflecting the complete lack of historical (or current) land-based sand & gravel extraction in that area, despite the existence of potential land-based resources.

- 3.33 For the time being, it seems reasonable to suppose that marine-dredged aggregates will continue to supply a similar proportion of overall demand as they have done over the last decade, so the demand for land-won aggregates in any of the sub-regions of either South Wales or North Wales is not likely to be affected.

#### Imports and Exports

- 3.34 The periodic Aggregate Mineral (AM) Surveys usefully include data on the distribution of aggregates from supply areas to destinations, and on the mode of transportation used. Such data is far from perfect, not least because it is only the initial destination that is recorded. In many cases this may be simply an intermediate processing and/or distribution depot, from which the products travel further. Nevertheless, it is the only available source of distribution data, and is therefore very important to the RTS process.
- 3.35 Table 3.5, on the following page, derived from information presented in Tables 4j and 4k of the AM Reports, reveals the extent to which aggregates produced in North Wales and South Wales are exported (either between those regions or, primarily, to England).
- 3.36 In North Wales, the main aggregate exports, by far, are those of Carboniferous Limestone which primarily are supplied to North West England. The AM Survey figures for North Wales generally show that, as overall sales fell during the recent recession – between 2005 and 2009, the proportion (as well as the totals) of exports also fell. This implies that, during periods of recession, for general-purpose limestone aggregates, there is a reduced dependence by importing regions on supplies from more distant sources, as would be expected. But the reverse is also true: as the economy has recovered from recession, since 2009, the demand for exports from North Wales has increased once again, and more quickly than the overall rate of economic growth.
- 3.37 In South Wales, the main export is of sandstone, the vast majority (almost 90%) of which is High Specification Aggregate (HSA) - skid-resistant road surfacing material with a Polished Stone Value (PSV) of 58 or above, and generally much higher (Thompson, Greig & Shaw 1993; Thompson *et al*, 2004). As noted earlier, these exports are of major importance because of the limited sources of unconstrained HSA materials within England. Reference to Table 3.5 shows that, although there was a reduction in sandstone exports between 2005 and 2009, the difference was much less marked than was the case for limestone exports from North Wales, especially in percentage terms. This reflects the fact that the market for skid-resistant road aggregate held up better, during the recession, than was the case for more general-purpose limestone aggregate (presumably because of the safety imperative of continuing to maintain skid resistance on major roads).

**Table 3.5: Summary of Regional-scale export data from recent AM Surveys**

<i>Note: all figures exclude sales for non-aggregate use</i>	<b>AM2001</b> (mt)	<b>AM2005</b> (mt)	<b>AM2009</b> (mt)	<b>AM2014</b> (mt)
<b>North Wales</b> (data from Table 4k of the AM reports)				
Land won Sand & Gravel Sales	1.342	1.192	0.589	0.897
S&G Exports*	0.544	0.508	0.128	0.158
<b>Exports as % of S&amp;G total</b>	<b>41%</b>	<b>43%</b>	<b>22%</b>	<b>18%</b>
Limestone Sales	6.062	4.641	2.636	3.508
Limestone Exports*	3.344	2.973	1.116	2.226
<b>Exports as % of Limestone total</b>	<b>55%</b>	<b>64%</b>	<b>42%</b>	<b>64%</b>
Igneous Sales	1.136	1.022	0.610	0.660
Igneous Exports*	0.091	0.277	0.064	0.054
<b>Exports as % of Igneous total</b>	<b>8%</b>	<b>27%</b>	<b>10%</b>	<b>8%</b>
Sandstone Sales	0	0	0	0
Sandstone Exports*	0	0	0	0
<b>Exports as % of Sandstone total</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>
Total Crushed Rock Sales**	7.198	5.663	3.245	4.168
Total CR Exports*	3.436	3.251	1.178	2.280
<b>North Wales CR Exports as % of CR total</b>	<b>48%</b>	<b>57%</b>	<b>36%</b>	<b>55%</b>
<b>South Wales</b> (data from Table 4j of the AM reports)				
Land won Sand & Gravel Sales	0.115	0.304	0.144	0.205
S&G Exports*	0.001	0.011	0	0
<b>Exports as % of S&amp;G total</b>	<b>1%</b>	<b>4%</b>	<b>0%</b>	<b>0%</b>
Limestone Sales	6.536	6.137	4.554	4.540
Limestone Exports*	0.262	0.154	0.052	0.332
<b>Exports as % of Limestone total</b>	<b>4%</b>	<b>3%</b>	<b>1%</b>	<b>7%</b>
Igneous Sales	0.838	1.238	1.025	1.577
Igneous Exports*	0.572	0.430	0.694	0.829
<b>Exports as % of Igneous total</b>	<b>68%</b>	<b>35%</b>	<b>68%</b>	<b>53%</b>
Sandstone Sales	2.648	3.498	2.605	1.709
Sandstone Exports*	1.457	1.941	1.258	0.852
<b>Exports as % of Sandstone total</b>	<b>55%</b>	<b>55%</b>	<b>48%</b>	<b>50%</b>
Total Crushed Rock Sales**	10.310	10.873	8.185	7.825
Total CR Exports*	2.302	2.527	2.003	2.013
<b>South Wales CR Exports as % of CR total</b>	<b>22%</b>	<b>23%</b>	<b>24%</b>	<b>26%</b>

\* 'exports' are primarily to England but include some movement between South Wales and North Wales.

\*\* Unlike the figures used elsewhere in this Review, crushed rock sales in the AM reports exclude slate

3.38 Wales has always been a net exporter of construction aggregates and imports of land-based aggregates from England are very minor, by comparison with exports. In North Wales, imports in 2014 (from Table 5k of the AM 2014 report) amounted to just 0.023mt of land-won sand & gravel, and only 0.128mt of crushed rock, most of which comprised igneous rock from neighbouring South Wales and Limestone from South West England. In South Wales in 2014 (from Table 5j), land-based imports amounted to 0.042mt of sand & gravel and 0.079mt of crushed rock, primarily limestone from South West England.

- 3.39 Imports and exports of marine-dredged sand and gravel between England and Wales are only relevant to the RTS apportionment exercise if they affect the continuity of supply of these materials to Wales and thus give rise to increased demand on land-based resources. This is potentially an issue in South East Wales which, as noted earlier, is heavily dependent upon marine aggregates. At the time of the First Review, Wales was a net importer of marine sand & gravel, dredged from the English side of the median line in the Bristol Channel and the Severn Estuary. This was noted in the Review as being likely to change, subject to the approval of new licence applications within Welsh waters. By 2019, the relative balance between imports and exports has shifted as a consequence of a new licence that has been recently permitted across the median line between English and Welsh waters. However, significant trade continues from English licences to Welsh markets as well as vice versa. In Liverpool Bay, the only licence area in Welsh waters remains a net exporter to north west English markets.
- 3.40 Recent AM Surveys have also included information on aggregate movement between sub-regions. In Wales the sub-regions used for this purpose<sup>11</sup> comprise:
- **North-East Wales** (Conwy, Denbighshire, Flintshire and Wrexham);
  - **North-West Wales** (Isle of Anglesey, Gwynedd & the Snowdonia National Park);
  - **South-East Wales** (Swansea, Neath Port Talbot, Bridgend, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly, Blaenau Gwent, Torfaen, Monmouthshire, Newport, Cardiff and the Vale of Glamorgan); and
  - **‘the Remainder of South Wales’** (Pembrokeshire, Pembrokeshire Coast National Park, Ceredigion, Carmarthenshire, Powys and the Brecon Beacons National Park).
- 3.41 Table 3.6, below, shows the results for crushed rock, for each mineral planning authority. In each case, figures are given for sales within the same sub-region, sales to directly adjoining sub-regions within Wales, and sales to other sub-regions, including those in England.
- 3.42 Similar data is available for sand & gravel aggregates, although the quantities involved are extremely small, except in the case of Wrexham, where 51% is sold within NE Wales, 27% in NW Wales and 22% elsewhere (primarily England).

---

<sup>11</sup> The sub-regions used for the AM Surveys should not be confused with those used for the analysis of future apportionments in this Review, as described on page 53 and shown in Figure 5.2.

**Table 3.6: Sub-Regional export data for crushed rock aggregates\* from the AM 2014 Survey report (Mankelov et al, 2016), expressed as percentages of total sales.**

<i>Note: all figures exclude sales for non-aggregate use</i>	Sales within sub-region	Sales to adjoining sub-regions in Wales	Sales to other sub-regions and to England
<b>North Wales</b> (data from Table 9k of the AM report)			
Conwy	25%	40%	35%
Denbighshire**	(44%)	(0%)	(56%)
Flintshire	33%	0%	66%
Gwynedd	77%	21%	3%
Isle of Anglesey	70%	17%	12%
Wrexham	-	-	-
<b>South Wales</b> (data from Table 9j of the AM report)			
Blaenau Gwent	100%		0%
Brecon Beacons National Park	2%	98%	0%
Bridgend	100%	0%	0%
Caerphilly	54%	46%	
Cardiff	39%	61%	0%
Carmarthenshire	23%	77%	0%
Ceredigion	100%	0%	0%
Monmouthshire	-	-	-
Neath Port Talbot	11%	57%	32%
Newport	-	-	-
Pembrokeshire	66%	34%	0%
Pembrokeshire Coast National Park			
Powys	26%	6%	68%
Rhondda, Cynon, Taf	80%	0%	20%
Swansea	-	-	-
Torfaen	-	-	-
Vale of Glamorgan	65%	35%	0%

\* Unlike the figures in Tables 3.3 and 3.4, above, crushed rock sales exclude slate

\*\* Denbighshire was omitted from Table 9k of the AM 2014 report, so the figures shown here are from AM 2009.

### ***Agreed Methodology***

- 3.43 The foregoing analysis indicates that there is very little clarity in terms of likely future trends in the demand for construction aggregates in Wales. As noted earlier, a decision was therefore made that the RTS should focus on matching future aggregates provision with a combination of historical sales data and the planned requirements for housing construction in Local Development Plans, rather than relying on any kind of detailed econometric forecasting.
- 3.44 Given that the relationship, such as it is, between house construction and aggregate sales is demonstrable at the national level, but not at regional or sub-regional levels, it is logical that figures for future provision should be set at the national level, and subsequently cascaded down to the regions, sub-regions and individual LPAs.

3.45 Following a detailed consideration of several options and permutations, the methodology agreed with the RTS Steering Group<sup>12</sup> was that this should entail four sequential stages, as set out below.

#### **STAGE 1: National Provision**

- Calculate the overall level of future aggregates provision in Wales at a national level by combining the historical sales average (taking the highest of the 10-year and 3-year averages for each LPA, for the reasons given in para. 3.8 above) with a factor which reflects the planned level of future housing construction activity, compared with that seen over the same 10-year baseline period (for details, see Chapter 5);

#### **STAGE 2: Regional Split**

- Divide the national figure between North Wales and South Wales, on the basis of the historical sales split between those regions which, as noted in paragraph 24 of MTAN1, has remained reasonably consistent over many years;

#### **STAGE 3: Sub-Regional and LPA Apportionments**

- Sub-divide the regional figures between a series of seven **sub-regions** (defined for the purpose of this Review<sup>13</sup>) and, *provided that it is feasible to do so*, between each of the constituent Local Planning Authorities (LPAs).
- In most cases, the distribution of apportionments within each sub-region is to be achieved through a combination of quantitative and qualitative judgements, exercised by the RTS Steering Group and facilitated by the appointed consultant. The judgements should aim to reflect the Steering Group's collective understanding of market requirements (reflecting both historical sales and the distribution of planned housing activity) together with considerations of existing landbanks, the proximity principle and environmental capacity.
- In a few areas, notably where there has been no production of land-won aggregates for many years, with no permitted reserves and zero apportionments, it might sometimes be more appropriate for the RTS apportionments to be subject to more detailed investigation by all of the LPAs within that particular sub-region and to industry responses to future calls for sites within those LPAs. In such cases, LPA apportionments will still be recommended but the possibility of alternative (more sustainable) sub-regional patterns of supply being found through sub-regional collaboration between LPAs and industry will be noted;

<sup>12</sup> comprising Welsh Government, the two RAWP secretaries, National Resources Wales, the Mineral Products Association, the British Aggregates Association and representatives of one local authority from each Region

<sup>13</sup> The sub-regions were created, at Welsh Government's suggestion, for the specific purpose of facilitating strategic minerals planning and collaborative approaches between LPAs. They each represent distinctive 'market areas' between which there is relatively little movement of aggregates, except for exports to England, and within which detailed, strategic consideration can be given as to the most appropriate patterns of supply.

#### **STAGE 4: Sand & Gravel / Crushed Rock Split, and Allocations**

- Sub-divide each LPA apportionment by aggregate type (sand & gravel or crushed rock), based on the recent historical sales split for that LPA and/or resource availability;
- Then determine the requirements for new allocations within individual LPAs by comparing the apportionment requirements over 22 years (for sand & gravel) or 25 years (for crushed rock)<sup>14</sup> with existing landbanks.

3.46 Further details regarding the implementation of this methodology are presented in Chapter 5, below but first, to inform the qualitative element of Stage 3, it is useful to review the nature and adequacy, or otherwise, of the existing pattern of supply.

---

<sup>14</sup> These derive from the minimum landbank requirements of 7 years for sand & gravel and 10 years for crushed rock, being required throughout an *entire* 15-year plan period, as set out in MTAN 1.

## 4. Analysis of the Existing Supply Pattern

### *Introduction*

- 4.1 Planning Policy Wales, paragraph 5.14.1 requires that, in order to provide for society's ongoing needs there should be a steady and adequate supply of construction-related minerals and mineral products. Paragraph 5.14.2 highlights the need to balance this fundamental requirement with the protection of amenity and the environment. This goes to the heart of the RTS process and requires that, as well as balancing supply and demand, consideration is given to the adequacy or otherwise of the existing pattern of supply, from a sustainability perspective. As explained in Chapter 2, this requires at least qualitative assessment of the pattern with respect to both proximity and environmental capacity.
- 4.2 In the original (2008) RTS, proximity was only considered in terms of the 'per capita' demand analysis which, as noted earlier, is difficult to justify. There is little, if any, correlation between aggregate sales and population size. Population density, together with the location of existing urban development, were examined, qualitatively, in the First Review, to provide some indication of the geographical areas where new construction is most likely to be concentrated. Proximity to such areas was seen as one measure of the sustainability of existing quarries, and a desirable factor in the location of new ones - subject, of course, to the availability of resources in those locations and to the consideration of other practical and environmental factors. In the present review, as well as population density, the additional factor of planned housing construction is also being considered.
- 4.3 The concept of environmental capacity was considered, in the original RTSs, only in terms of providing qualitative descriptions for each LPA, based on outputs from the IMAECA analysis. It had no influence at all on the resulting apportionments or allocations (although future working within National Parks was discouraged as a more general matter of Policy - paragraphs 21 and 22 of the former MPPW; and paragraphs. 46, 49, 51, 52 & 53 of MTAN1).
- 4.4 In the course of the First Review, a determined attempt was made to use both the proximity principle and environmental capacity to better effect, in conjunction with an understanding of resource availability and historical supply patterns, in order to enhance, if possible, the spatial distribution of future supply sources. That process is continued in this Review, taking account of the additional information now available on the spatial distribution of planned future housing provision.
- 4.5 In considering such enhancement, it must be remembered that supply patterns are crucially dependent on the availability of suitable resources and on the commercial viability of working them. Minerals can only be worked where they are found. Moreover, they can only be worked on a commercial scale where quarry operators are willing to invest in their extraction, and in the procedures necessary to avoid (or minimise) potential adverse environmental impacts. In most cases, the detailed economic and commercial factors involved for individual sites cannot adequately be assessed at the strategic level represented by the RTS.

- 4.6 It must also be remembered that improved proximity might sometimes be at the expense of reduced environmental capacity; whilst improved capacity might be at the expense of increased transportation distances, with consequential increases in carbon emissions and traffic impacts. The two factors therefore need to be considered in combination.
- 4.7 Consideration also needs to be given to other factors, including the relative merits of extensions to existing quarries as opposed to new 'greenfield sites'; the need to avoid stifling competition between different operators; and the need to maintain productive capacity – both to maintain a healthy degree of competition between different operators and to ensure that the supply pattern has the necessary resilience to be able to cope with periodic spikes in demand (as, for example, may be associated with major infrastructure projects or other large-scale development initiatives).
- 4.8 These detailed issues can most effectively be dealt with at a local level, however, once the overall strategy has been established. For this reason, the following analysis begins with a consideration of the broad, national and regional picture, with more detail being provided in the sub-Regional analyses presented in Appendices A and B. The key findings are then carried through to the assessment of future apportionments and allocations, in Chapter 5.

### ***National and Regional Analysis***

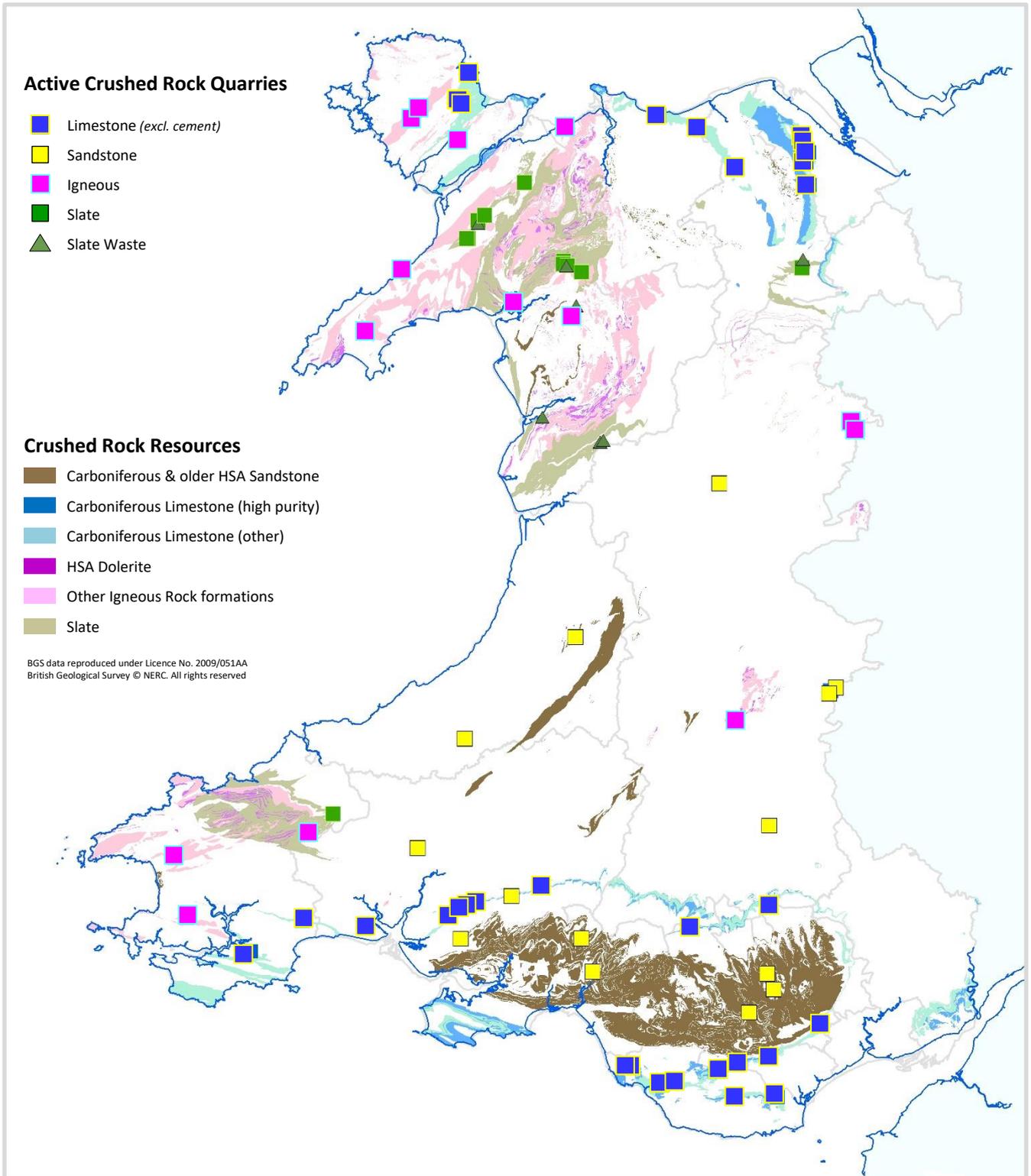
#### Distribution of Quarries and Resources

- 4.9 As noted above, the distribution of suitable geological resources is of fundamental importance in understanding the distribution of existing quarries, and in understanding the limitations involved in locating potential new ones. Once again, it is important to stress that minerals can only be worked where they are found.
- 4.10 Figure 4.1, below, shows the distribution of crushed rock quarries in Wales which were active in 2018, together with the outcrops of the key resources. The quarry locations are taken from an updated edition of the BGS 'Britpits' database<sup>15</sup>, limiting the selection to those which produce hard rock aggregates, either as a primary product or (in the case of slate waste tips) as a secondary material. Larger scale maps, which show the locations of inactive and dormant, as well as active quarries, are presented in the more detailed analysis contained within the Regional Appendices (A and B).

---

<sup>15</sup> A 2018 edition of the Britpits database was supplied by the BGS at the outset of this study but was then updated by the RAWP secretaries, particularly in terms of current operational status and ownership.

**Figure 4.1: Active Crushed Rock Aggregate Quarries and Resources in Wales, 2018**



4.11 The resource outcrops on Figure 4.1 are taken directly from the digital dataset produced for the BGS Mineral Resources Map of Wales (Humpage & Bide, 2010), but are limited to those resources which are important for the production of crushed rock aggregates. These include all 'Category 1' resources, as identified on the BGS

maps, and some (but not all) 'Category 2' resources. They fall into seven main groups, as follows:

- Carboniferous HSA sandstones (Category 1)
- Pre-Carboniferous HSA sandstones (Category 2)
- High Purity Carboniferous Limestone (Category 1)
- Other Carboniferous Limestone (Category 2)
- HSA dolerites (Category 1)
- Other igneous rock formations (Category 2)
- Slate (Category 2)

4.12 The term 'HSA' refers to 'High Specification Aggregate', which is suitable for use as skid-resistant road surfacing aggregate as defined in the original 'Travers Morgan' report on these materials for the former Department of the Environment (Thompson, Greig & Shaw, 1993). They are characterised by a high Polished Stone Value (PSV $\geq$ 58) in combination with a low Aggregate Abrasion Value (AAV $\leq$ 16) and tend to command a premium price compared with other types of road aggregate. They are also transported over much greater distances in order to meet specification requirements in areas which have no comparable indigenous resources (which includes most of eastern and southern England). HSA aggregates in Wales include certain types of hard sandstone (particularly the Carboniferous 'Pennant' Sandstones of the South Wales coalfield, and some older sandstones - mainly within Powys), and certain types of dolerite (a particular variety of igneous rock) which occurs within various parts of south-west, north-west and mid-Wales.

4.13 It should be noted that some of the extensive sandstone formations within mid-Wales and North Wales that were identified as potential HSA resources within the 1993 Travers Morgan report have since been refined by the most recent and more detailed BGS resource mapping, such that only parts of those resources are now identified as potential sources of HSA material on a commercial scale.

4.14 The usual caveat should be added that not all of the outcrops, of any of the rock types or formations listed at para. 4.11, above, will necessarily be suitable for commercial quarrying. This is because all geological materials are inherently variable, from one part of their outcrop to another. Moreover, the commercial viability of extraction is also influenced by a large number of other practical issues including the local extent of the deposit, land ownership, access, and distance from market, as well as planning and environmental constraints.

4.15 Above all, it must be emphasised that Figure 4.1 (and Figure 4.2 below) displays the extent of potential **resources** and not **permitted reserves**. Resources are geological materials, including rock formations and naturally occurring sand & gravel deposits, which have the *potential* to be used for a particular purpose (in this case as construction aggregates). Reserves, in the broadest sense, are those parts of a resource which are *known* to be suitable for this purpose (usually as a result of detailed ground investigations and laboratory testing) and permitted reserves are

those which have valid planning permission for the winning and working of the materials in question.

- 4.16 Excluded from Figure 4.1 are a range of weaker sandstones and limestones, including some 'Category 2' resources, which are not currently exploited as sources of crushed rock aggregate on anything other than an extremely local scale (e.g. for use on farms etc.), and where this is most unlikely to change in future, because of their inherent unsuitability for more commercial applications. Such resources include all Devonian sandstones and all post-Carboniferous sandstones and limestones. Whilst many of these have been identified by the BGS as being worthy of safeguarding within Local Development Plans (Wrighton & Humpage, 2012), they do not represent practical alternatives to the resources listed above, in terms of their ability to meet the same commercial specifications and are therefore not considered further here.
- 4.17 Figure 4.2, below, provides a similar map of the distribution of land-based sand & gravel pits, together with the corresponding potential resources. The latter are once again taken largely from the BGS Mineral Resources Map of Wales and include a wide range of sediments which have potential as sources of natural aggregate. The same caveats apply as for the crushed rock resources noted above.
- 4.18 Figure 4.2 also shows, within NW Wales and SE Wales, more specific potential resource blocks which were identified in more detailed studies carried out for the National Assembly for Wales (Thompson et al., 2000; University of Liverpool, 2003). These are not necessarily the only potential worthwhile resources, but they are the most rigorously assessed, within the areas concerned.
- 4.19 Figure 4.3, which follows, shows the areas which are within an illustrative 20km radius of one or more currently active crushed rock quarries; and Figure 4.4 provides a similar illustration in respect of both land-based sand & gravel quarries and ports which receive marine-dredged aggregates (principally sand).
- 4.20 In most cases, the economic radius of distribution from these locations is considerably greater than 20km: typically up to 50km for 'ordinary' graded aggregate or further in the case of value-added products (e.g. ready-mixed concrete and asphalt materials) that are often produced at remote depots for onward distribution, and much further still in the case of High Specification Aggregates or High Purity limestone.
- 4.21 The diagrams merely illustrate that the existing pattern of supply within Wales already conforms reasonably well to the Proximity Principle: very few parts of the country (those shown in black on Figure 4.3) are more than 20km from a source of crushed rock aggregate and many of those which are further away fall within 20km of either a land-based sand & gravel pit or a wharf which imports marine-dredged aggregates. Elsewhere, the distances are more than 20km but rarely more than 30km, and in most cases these are remote rural areas which are unlikely to generate significant levels of demand.

**Figure 4.2: Land-based Sand & Gravel Pits and Resources in Wales, 2018**

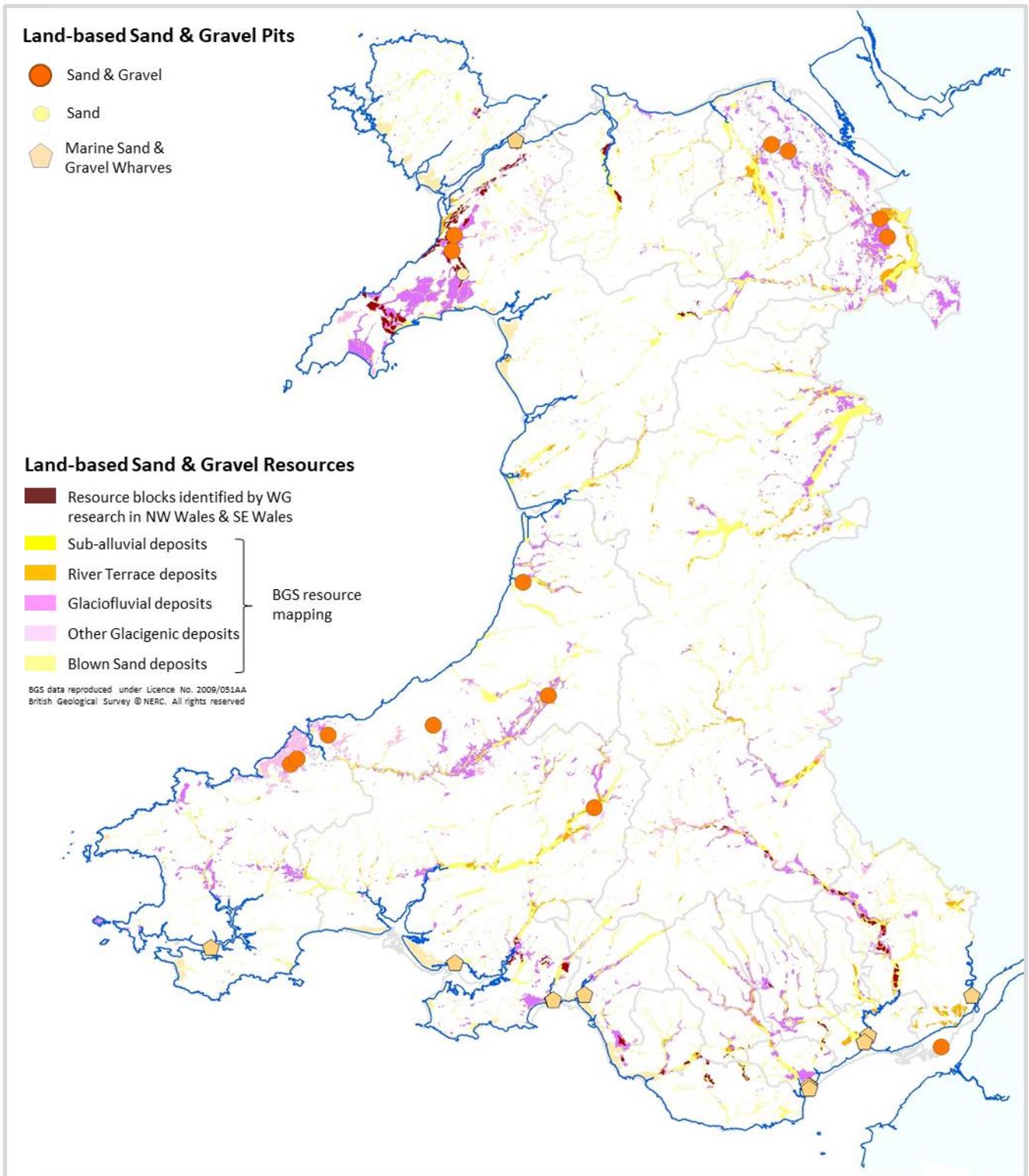


Figure 4.3: illustrative 20km radii from all active crushed rock quarries in Wales, 2018.

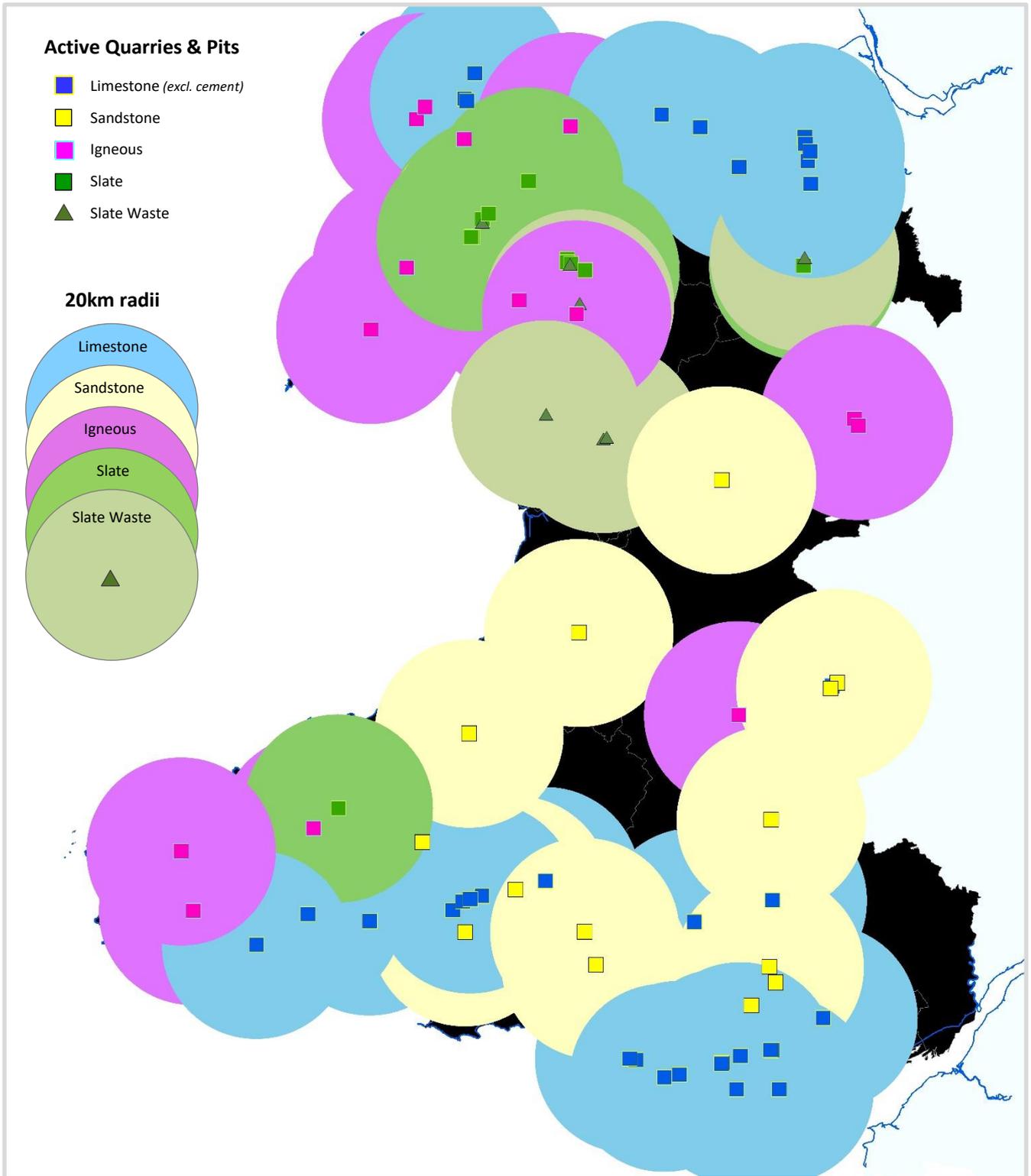
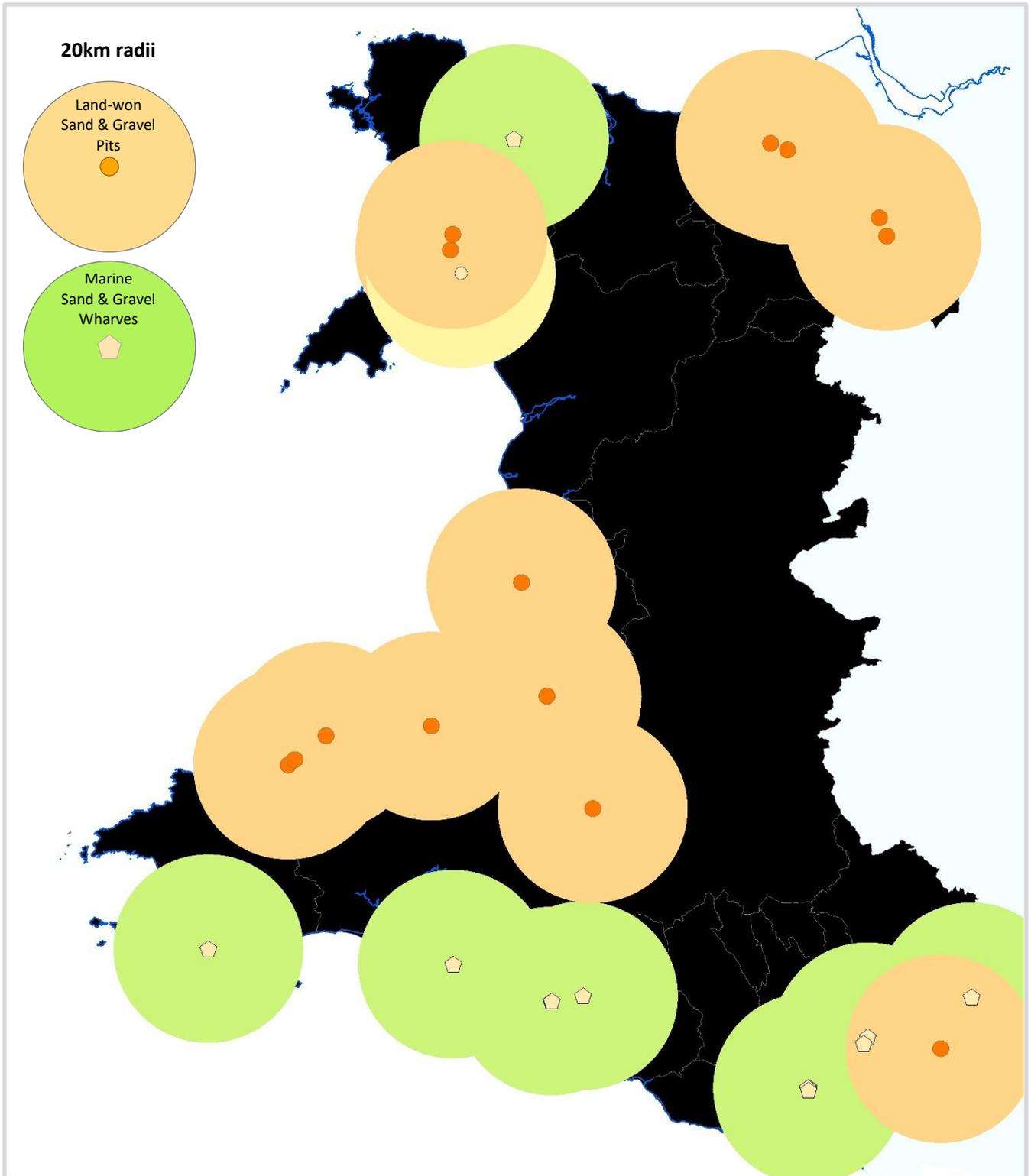


Figure 4.4: illustrative 20km radii from all active sand & gravel pits & wharves in Wales, 2018.



4.22 Figure 4.5, below, shows the distribution of crushed rock quarries in relation to the scale of crushed rock aggregate production, as measured by average historical sales figures for each LPA over the baseline period (2007-2016). The shading corresponds

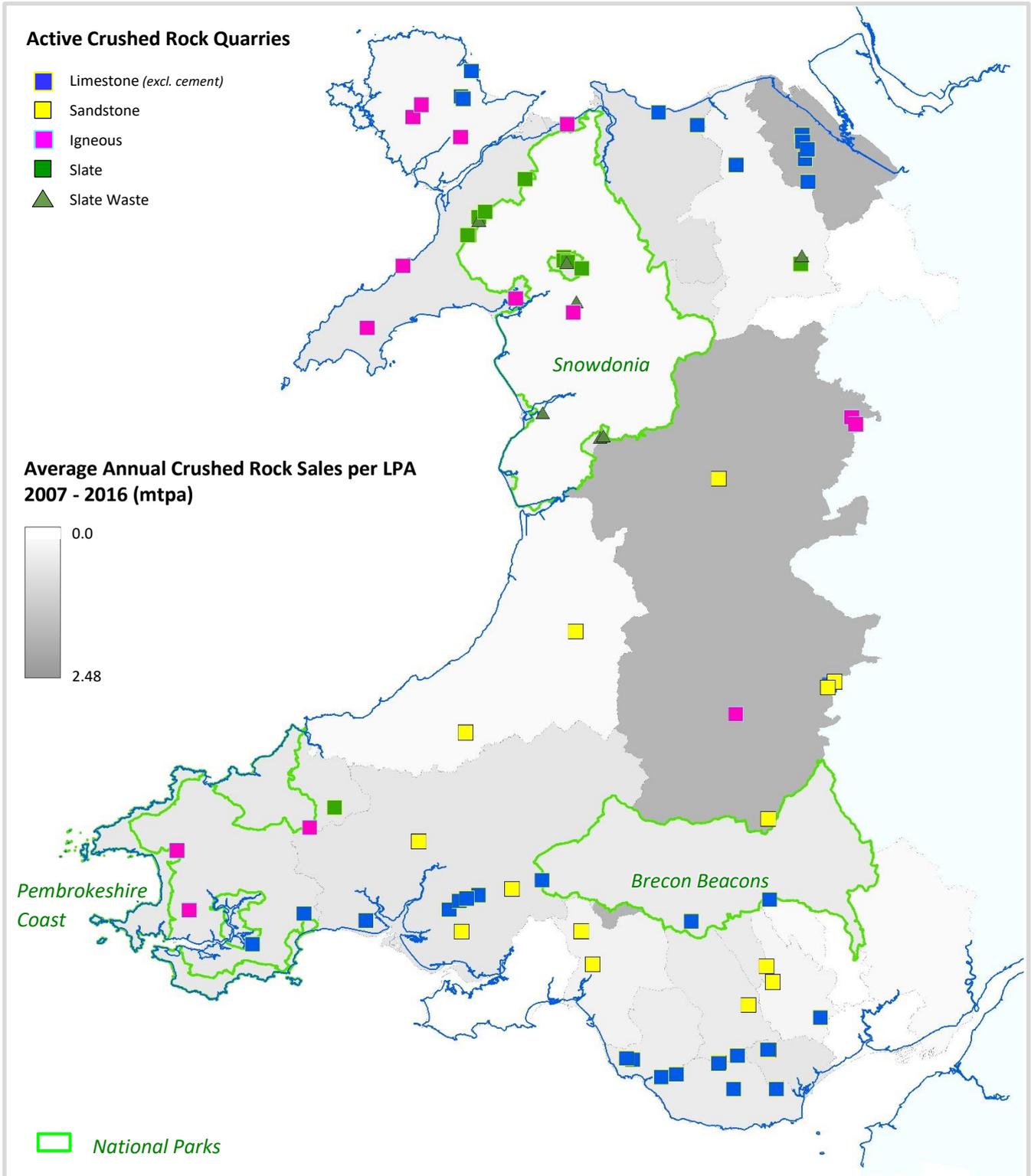
to the figures given in Tables 5.4 and 5.6 in Chapter 5<sup>16</sup>. It is emphasised that this illustrates variations in production, not demand, and therefore includes both domestic consumption and exports to adjoining areas, including England. Figure 4.6 then provides a similar map for land-based sand & gravel production, displaying the data from Tables 5.3 and 5.5.

- 4.23 The focus of production for crushed rock is clearly seen, from Figure 4.5, to be in North-East Wales - particularly Flintshire (which is where most of the exporting Carboniferous Limestone quarries are located); and in Powys, where a number of sandstone and igneous rock quarries supply HSA material to England - particularly to adjoining parts of the West Midlands. In the rest of South Wales the picture is distorted by the much smaller size of many of the individual unitary authorities, particularly in the south-east, where the totals for each LPA are less than for the much larger county of Powys, even though overall production within SE Wales is double the total for Powys.
- 4.24 Historical crushed rock sales in South Wales have been concentrated within the Carmarthenshire, Bridgend, Vale of Glamorgan, Rhondda Cynon Taf and Cardiff LPAs (which is where most of the larger Carboniferous Limestone quarries in South Wales are located), and in the adjoining LPAs of Caerphilly and Neath Port Talbot, where additional HSA sandstone quarries are also located. Whereas much of the crushed rock production within NE Wales is supplied to the neighbouring parts of North West England, particularly Merseyside, most if not all of the limestone production in South East Wales appears to be utilised locally, within the producing areas, and within the adjoining LPAs of Swansea and Neath Port Talbot, to the west, and those of Merthyr Tydfil, Caerphilly and the 'Former Gwent' authorities to the east. Although Carboniferous Limestone resources do exist in these adjoining areas, they are either less extensive and/or more heavily constrained (see Appendix B for more detailed analysis).
- 4.25 The fact that little or none of the limestone from South Wales is exported further east, into England, is evidenced by the fact that additional Carboniferous Limestone from the Forest of Dean in Gloucestershire is currently being imported into the former Gwent area to make up for what would otherwise be an overall shortfall of supply. Although SE Wales has significant exports of crushed rock to England, most if not all of those exports are of HSA from the Pennant Sandstone formations of the South Wales Coalfield.
- 4.26 Overall, the pattern of crushed rock aggregate production outlined above relates largely to the availability of resources, the location of established supply units and the proximity of these to the main areas of construction activity and/or to major transport routes such as M4 corridor. Further analysis of the supply pattern, including the relationships between quarry locations, resources, markets, major designations and environmental capacity, is provided in paragraphs 4.30 *et seq.*, below, and in the two Regional Appendices.

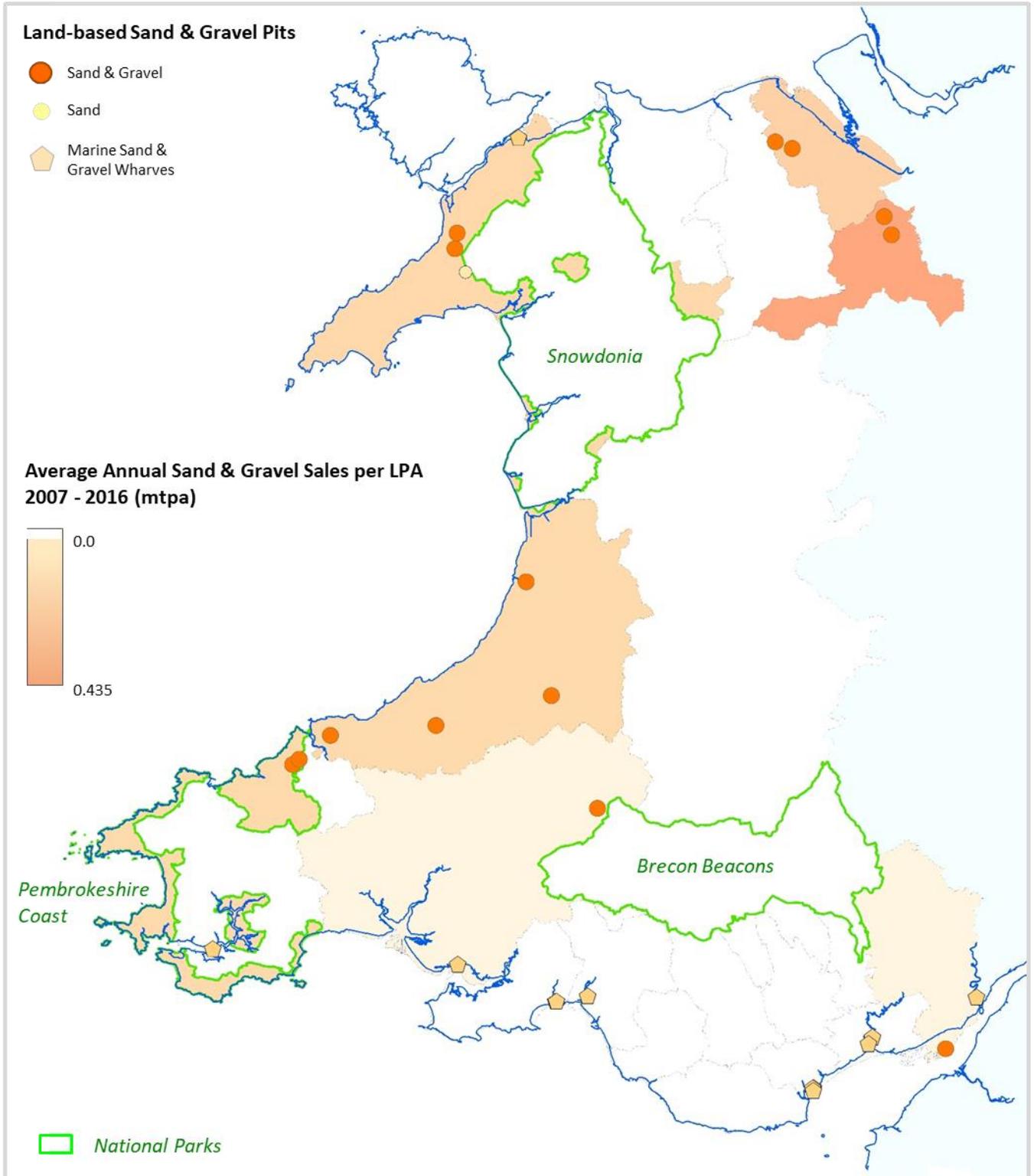
---

<sup>16</sup> The exception being Snowdonia National Park, which is combined with Conwy in Table 3.1, for confidentiality reasons, but which in fact had very limited production over the baseline period, from a single site.

**Figure 4.5: Spatial Distribution of Crushed Rock Production within each LPA, based on Average Sales 2007 - 2016, with locations of Active Crushed Rock Aggregate Quarries (2018)**



**Figure 4.6: Spatial Distribution of Land-won Sand & Gravel production within each LPA, based on Average Sales 2007 - 2016, with locations of Sand & Gravel Pits (2018)**

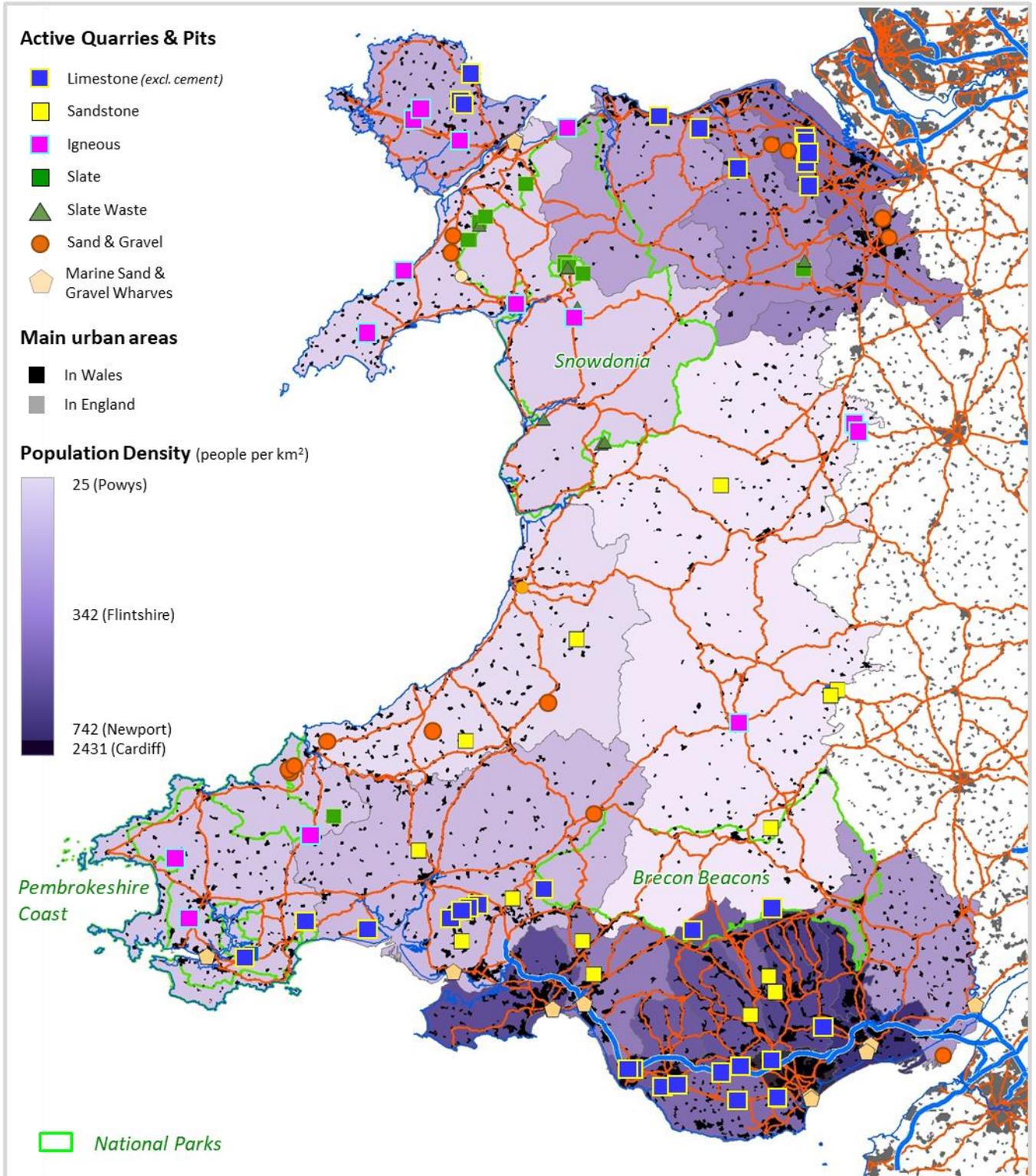


- 4.27 Looking to the future, any undue reliance on historical supply data would inevitably reinforce and perpetuate the same patterns of supply. More careful consideration is therefore needed where such reliance would unnecessarily perpetuate adverse environmental effects or unjustified inequalities in the balance of supply between neighbouring authorities (see also para. 4.27, above); or where undue reliance might otherwise be placed on the continued availability of supplies from an adjoining LPA or country (e.g. imports from Gloucestershire into SE Wales). In addition, any imposed change to the existing supply pattern may, in some cases, either necessitate working less suitable, thinner or otherwise less viable resources, where these exist, or (in some cases at least) may entail increased transportation distances, with consequential increases in carbon emissions and traffic impacts. All of these issues are explored in more detail in the sub-regional analyses within Appendices A and B.
- 4.28 In the case of sand & gravel production, as illustrated in Figure 4.6, the picture is greatly distorted by the reliance of South East Wales, in particular, on marine-dredged aggregates from the Bristol Channel and the Severn Estuary. South West Wales is less dependent on marine aggregates and has a small number of active land-based sites. Powys is too far removed from the coast to be influenced to any significant degree by marine aggregates, but still has only one very small land-based sand & gravel site currently in operation. It is reliant instead on crushed rock material, despite the apparent resources of natural sand & gravel within the upper reaches of the Severn, Wye and Usk valleys. In North Wales, there are, once again, apparently plentiful resources of natural sand & gravel in Gwynedd (as indicated in both BGS and Liverpool University mapping) but the supply pattern is dominated by one major quarry within Wrexham and (to a much smaller extent) by two further units within Wrexham and two or three others in Flintshire. Further details are given in the Regional Appendices.
- 4.29 Overall, in South Wales and much of North Wales, the relative lack of land-based sand & gravel production is influenced to a very large extent by environmental and landscape concerns, as well as by the relative ease of availability of alternative materials (marine aggregates, crushed rock and slate, including slate waste).

Comparison of the Supply Pattern with Population Density and Transport Links

- 4.30 Figure 4.7, below, shows the distribution of all currently active quarries and pits throughout Wales in relation to variations in population density by local authority area. It also shows urban areas, A-roads and motorways. Additional local roads, not shown on this map, will also be utilised close to individual quarries, distribution depots or customer locations. Together, the areas of high population density and the main urban areas provide a good indication of where construction activity, as a whole, is most likely to be concentrated, but the locations of major transport routes, such as the A55 in North Wales, and the M4 corridor in South Wales have important influences on export distribution. The map does not show railways, which are generally not used for aggregate distribution, though they are important for a few of the quarries in the South Wales coalfield area and along the North Wales coast.

**Figure 4.7: LPA Population Densities (2010) and main urban areas, as approximations for the overall pattern of demand for construction aggregates, with motorways, A-roads, national landscape designations and locations of all active quarries & pits (2018)**



- 4.31 In North Wales, the highest population density occurs within Flintshire and Wrexham, coinciding with the highest levels of crushed rock and sand & gravel output, respectively, within that region (see figures 5.5 and 4.6, above). The road network in these areas also provides ease of access for exports into the conurbations of North West England, including the Wirral, Liverpool and Warrington. The main apparent anomaly here is the absence of crushed rock production within Wrexham. Although Carboniferous Limestone resources do exist in the western part of this authority, they fall almost entirely within the Clwydian Range & Dee Valley AONB. It will generally not be appropriate for new allocations to be identified within such areas, unless there are no viable alternatives within neighbouring Flintshire or Denbighshire. This is discussed at greater length in Appendix A, as is the need to maintain sand & gravel supplies within North West Wales by developing further resources in Gwynedd.
- 4.32 In South Wales, there is some coincidence between the areas of high population density and urban areas, on the one hand, and the distribution of crushed rock sales and quarries, on the other, but the relationship is less clear than in the north and the need for adjustments to the future supply pattern is, in some cases, more compelling. In particular, the areas of Newport, Torfaen, Blaenau Gwent and Caerphilly have higher population densities than those of the Vale of Glamorgan, Bridgend and RCT, but it is in the latter areas where most of the Carboniferous Limestone outcrops and quarries are located. Similarly, Swansea has a high population density but no active quarries or pits, relying instead on neighbouring Carmarthenshire for most of its limestone supplies, on Neath Port Talbot for supplies of road surfacing aggregate, and on marine dredged sources landed at Swansea Wharf for building sand. As with Wrexham in North Wales, Swansea does have indigenous resources of Carboniferous Limestone but again these are almost entirely within an AONB designation – that of the Gower Peninsula.
- 4.33 As noted in the First Review, the distribution of crushed rock quarries in this area as a whole is therefore not ideally matched with the main areas of demand, suggesting that there may need to be some adjustment in terms of future apportionments, on the grounds of proximity. This, however, needs to be examined in more detail and balanced against both environmental capacity and commercial factors – not least including the availability or otherwise of workable resources within and outside national landscape designations. Further commentary on this is given in Appendix B.
- 4.34 In mid Wales, there is a marked contrast between the very low population density of Powys and the high level of demand placed upon that County, in terms of crushed rock sales (compare Fig 4.7 with Fig 4.4). This, as noted earlier, is primarily due to a number of large quarries within Powys which export High Specification Aggregates by road to markets in England. Taking that into account, together with the distribution of these important resources, these quarries are clearly well-placed in terms of proximity to the relevant markets and transport routes.

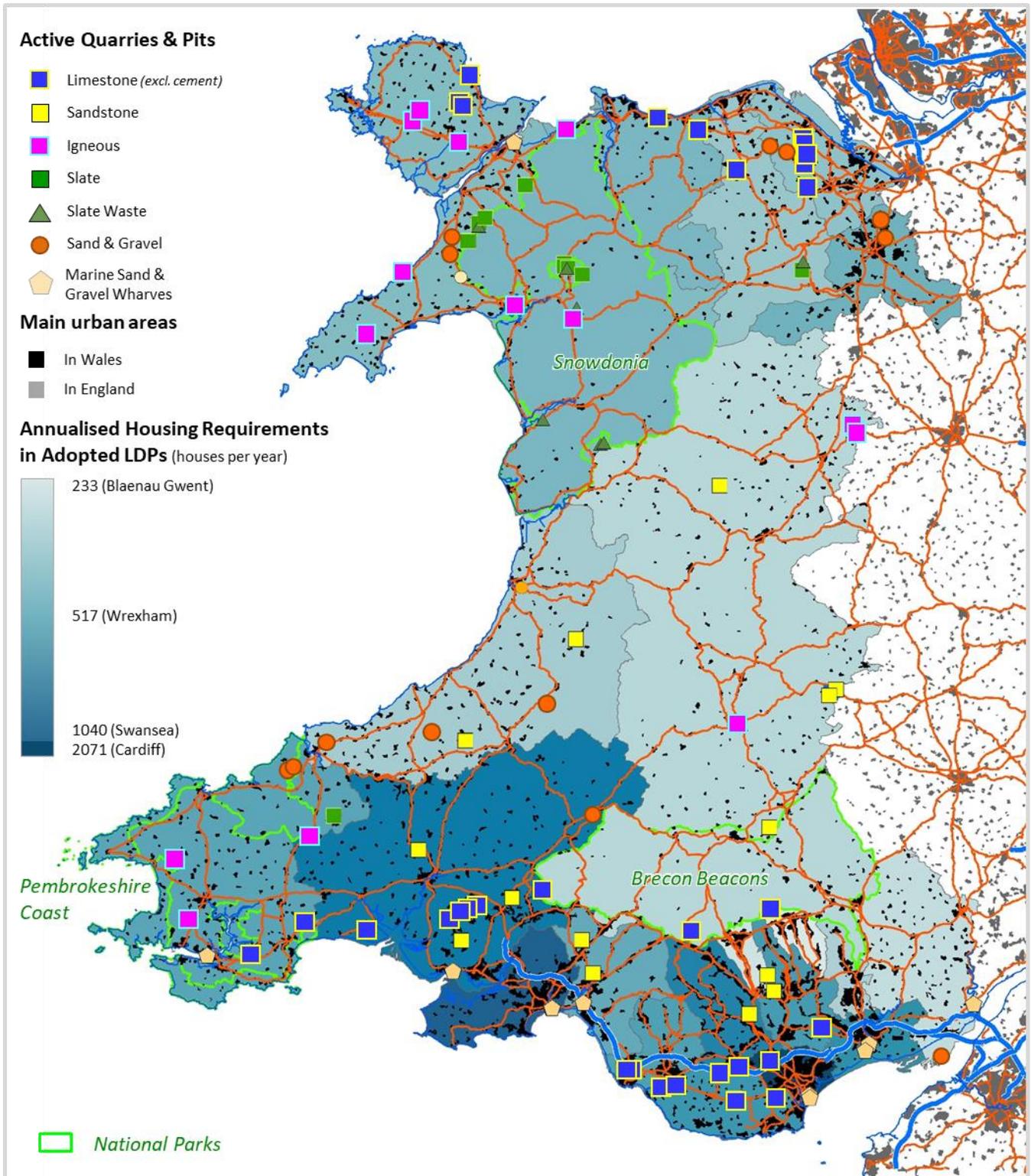
Comparison of the Supply Pattern with Planned Development

- 4.35 Consideration also needs to be given to the distribution of supply sources in relation to that of the planned distribution of new housing provision since, as explained in Chapter 3, this is likely to have an important influence on the location of future aggregate consumption. Figure 4.8, below, therefore illustrates the distribution of active quarries in relation to the annualised housing requirement set out in Local Development Plans.
- 4.36 In this case, the indicated pattern of consumption is somewhat closer to the pattern of supply, than is the case when looking at population density. In South East Wales, especially, the housing requirement figures are relatively modest in Blaenau Gwent, Torfaen and Monmouthshire, which are served by only a single quarry, but the anomaly is still seen in Swansea, which has the second highest housing requirement figures, after Cardiff.

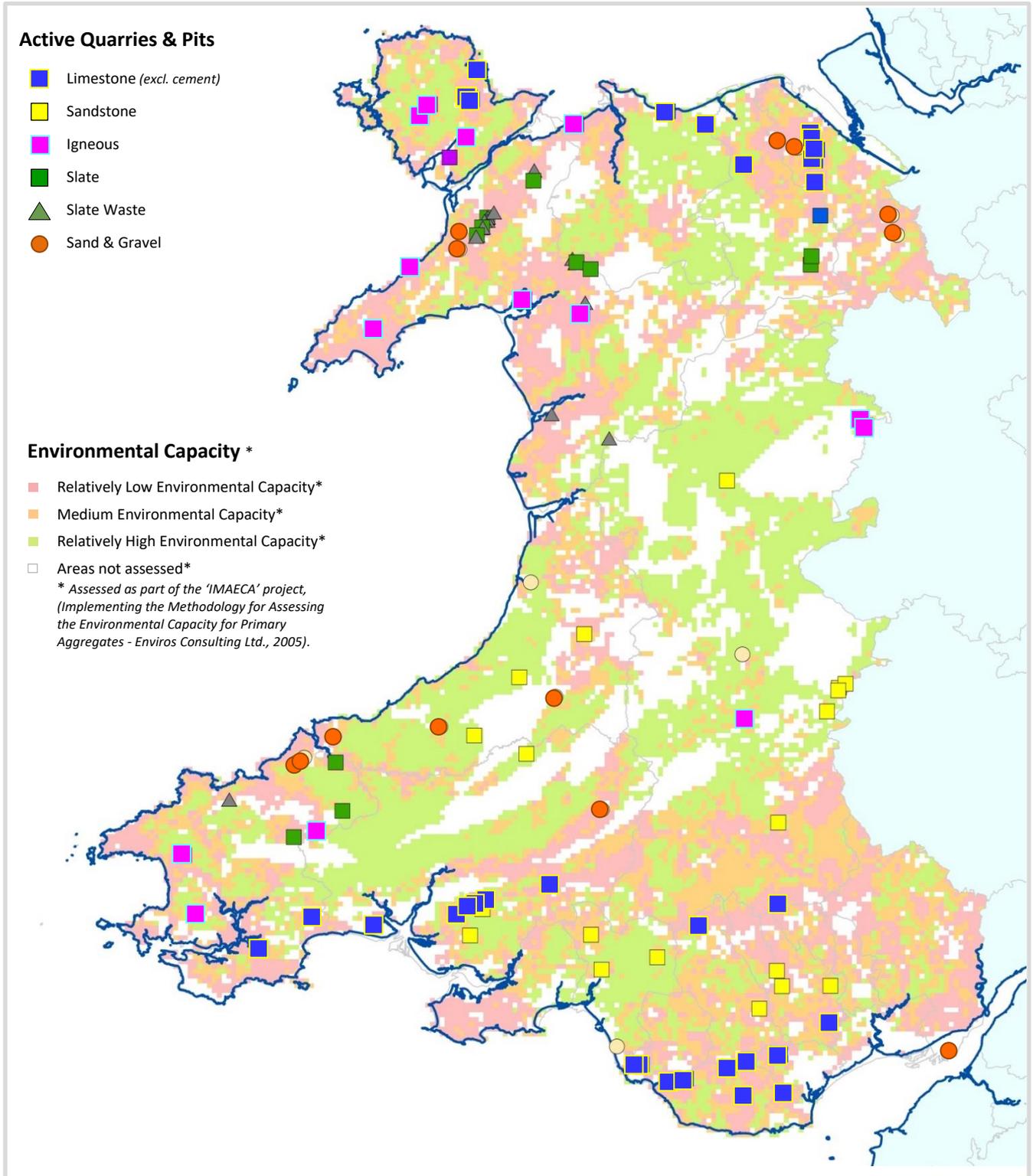
Comparison with Environmental Capacity

- 4.37 Figure 4.9, below, compares the distribution of active quarries with the spatial variations in Environmental Capacity across most (but not all) of Wales, as indicated by the 'combined scores' from the IMAECA Geographic Information System tool developed by Enviros Consulting Ltd. (2005). As explained more fully in paragraphs 2.14 et seq., above, the tool provides values, relative to arbitrary thresholds between the three coloured categories, for each 1km square which was assessed by the IMAECA project. The areas assessed were identified on the basis of whether or not aggregate resources were present within all or part of each square. Areas which were considered not to contain such resources were not assessed, which is why many parts of the country are left blank.
- 4.38 It should be noted that, whilst the GIS tool allows separate results to be shown for different resource categories, those categories do not entirely match with the current BGS mineral resource maps and the resource outlines are therefore quite different. It is therefore more useful to look at the overall picture, as shown in Figure 4.9 (and, at a slightly larger scale but at the same level of detail, in the various maps which accompany the sub-Regional analysis in Appendices A and B).
- 4.39 It must be emphasised that the IMAECA results are intended only to provide a very broad indication of the capacity of different areas to accept the environmental impacts of additional quarrying activity. They are necessarily generalised and are specifically *not* intended to take the place of conventional 'sieve-mapping' within individual Local Authorities, where more detailed constraint maps can be used and site-specific issues can be examined to determine the relative pros and cons of different factors.

**Figure 4.8: Annualised Planned (LDP) Housing Requirements in LPAs and National Parks, as partial indicators of the pattern of demand for construction aggregates, with motorways, A-roads, and locations of all active quarries & pits (2018)**



**Figure 4.9: Environmental Capacity Assessment (combined scores for each km<sup>2</sup>), as assessed by the IMAECA project, with locations of all active quarries & pits (2018)**



4.40 The IMAECA results have also been criticised for the fact that the presence of an existing quarry is treated, in the IMAECA analysis, as a factor which reduces the capacity for further quarrying in that area. Whilst there might be some justification for this, in terms of seeking to minimise cumulative impacts, it conflicts with the

widely-held notion that well-designed extensions to existing quarries are likely to be more acceptable, at least in terms of public perception, than the introduction of quarrying to previously undisturbed 'greenfield' sites.

- 4.41 Bearing all of that in mind, the IMAECA results nevertheless provide a useful starting point for comparing environmental capacity issues with other factors (including resource availability, proximity and commercial viability) in areas where the historical supply pattern is thought to be in need of improvement, from a sustainability point of view. This is examined further in the Regional Appendices (A and B), the key findings of which are summarised at the end of this chapter.

### ***Sub-Regional Analysis of Supply Patterns***

- 4.42 More detailed, sub-regional analyses of the inter-relationships between each of the various factors outlined above were taken into account during Stage 3 of the apportionment process, as summarised in Chapter 5, below. They are described more fully in the Regional Appendices for North Wales (Appendix A) and South Wales (Appendix B).

## 5. Assessment of Apportionments and Allocations

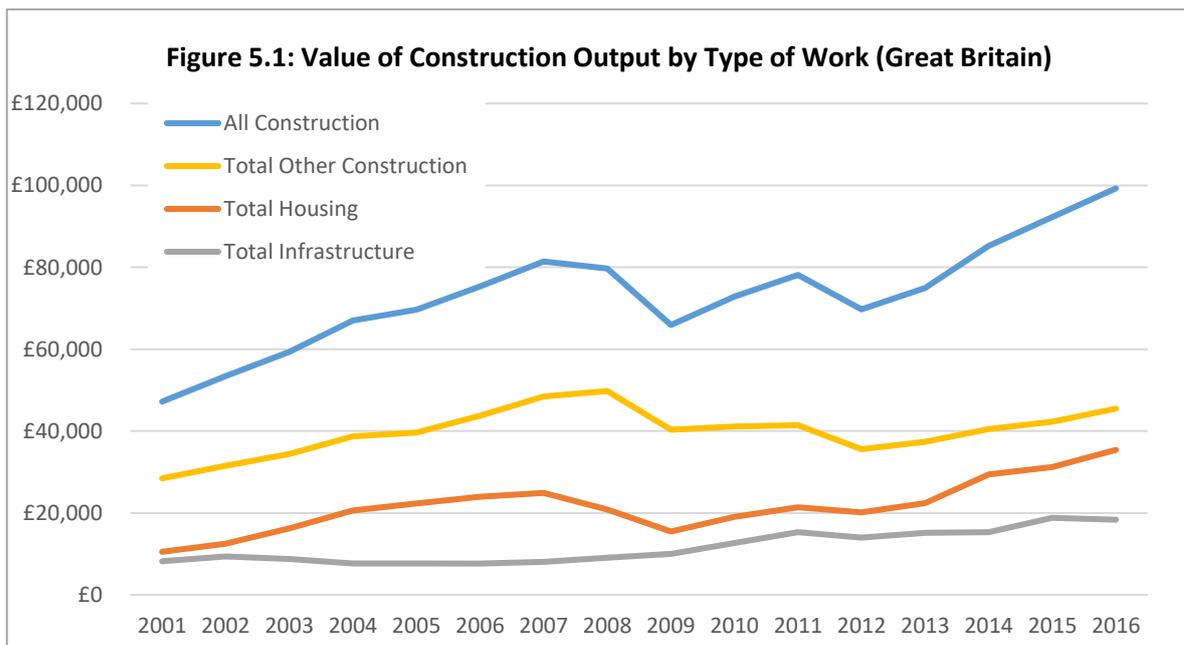
5.1 The foregoing review of the existing supply pattern feeds into the overall methodology for determining apportionments and allocations for future working, as set out in Chapter 3. This Chapter implements the four sequential stages of that methodology.

### **STAGE 1: Setting the National Level for Future Aggregates Provision**

5.2 The agreed methodology begins by establishing the overall (national) level of future provision for all land-won primary aggregates in Wales. This is required to be assessed by combining historical sales data (using the highest of 10-year and 3-year averages, as explained in para. 3.8, above, and totalling 15.557mt) with a factor which reflects the planned level of future construction activity, compared with that seen over the same 10-year baseline period.

5.3 Housing is an important element of such activity and one for which quantified requirements and levels of provision are made in local development plans, in a way which can readily be related to aggregate consumption. Clearly, however, housing accounts for only part of the overall level of aggregate consumption. Before deciding on how best to use the housing figures, it is therefore useful to consider the overall breakdown of construction activity. Statistical information on this is not readily available for Wales, but a useful insight can be gained by using data for the whole of Great Britain, which is published annually by the Office of National Statistics (ONS).

5.4 Figure 5.1 and Table 5.1, below, derived from the ONS Construction Statistics Annual 2017, show how housing accounts for just under 30% on average of all new construction work, in terms of value, varying over time from 22% to 36%.



SOURCE: Combined public & private sector data from Table 2.4c in the ONS Construction Statistics Annual, 2017.  
<https://www.ons.gov.uk/businessindustryandtrade/constructionindustry/datasets/constructionstatisticsannualtables>

**Table 5.1: Percentage value of construction output by type of work, Great Britain.** (SOURCE: as for Figure 5.1)

YEAR	2001	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16
Housing %	22%	23%	27%	31%	32%	32%	31%	26%	24%	26%	27%	29%	30%	34%	34%	36%
Infrastructure %	17%	18%	15%	11%	11%	10%	10%	11%	15%	17%	20%	20%	20%	18%	20%	18%
'Other' %	60%	59%	58%	58%	57%	58%	59%	62%	61%	56%	53%	51%	50%	48%	46%	46%

- 5.5 Major infrastructure projects can have a very substantial effect on the demand for construction aggregates within particular areas or regions. Whilst this needs to be reflected in the planning for future aggregates provision, the difficulty lies in the fact that such projects are rarely planned to a reliable delivery timescale and are susceptible to major political and investment decisions which are beyond the scope of the planning system (as demonstrated, for example, in the case of the proposed Swansea Tidal Lagoon, the Wylfa Newydd nuclear power station and the M4 Newport relief road). There is also considerable difficulty in quantifying the requirements for individual projects in terms of the need for construction aggregate. Overall, infrastructure accounts for between 10% and 20% of total construction value, averaging just under 16%. Its influence on overall demand is therefore likely to be much less than that of housing, and far more difficult to quantify.
- 5.6 The majority (more than half, on average) of total spending is associated with 'other' types of construction activity. These include schools & universities, offices, entertainment, hospitals, factories, warehouses and a variety of miscellaneous work. Whilst all of these will influence the overall demand for construction materials, in many cases the materials used are likely to be dominated by steel and glass, rather than aggregates. Moreover, whilst much of the building work is recognised in Local Development Plans, in terms of allocations for employment, hospitals, schools, etc., there is no mechanism for quantifying the aggregate requirements involved or for comparing planned activity with historical data.
- 5.7 In recognition of these various observations, and taking account of the close correlation between house building and aggregates provision; the fact that housing accounts for around 30% of all construction activity (at a GB level); and the fact that provision for house building is set to double (at a national level); it would seem justified to allow for a doubling of that 30% element of the overall supply. In other words, in order to ensure that adequate provision is made for the future supply of aggregates to support planned housing construction, the national level of overall provision should be set at 130% of the historical sales figure. The latter, as noted above, has been calculated as 15.557 mtpa. Applying a 30% uplift to this figure thus gives a **headline, national figure for future primary, land-won aggregates provision is calculated to be 20.224 mtpa.**
- 5.8 This figure is only marginally higher than the actual recorded sales total of 20.11mt for the year 2007 at the start of the baseline period, immediately prior to the economic recession, so is demonstrably not an unreasonable figure.

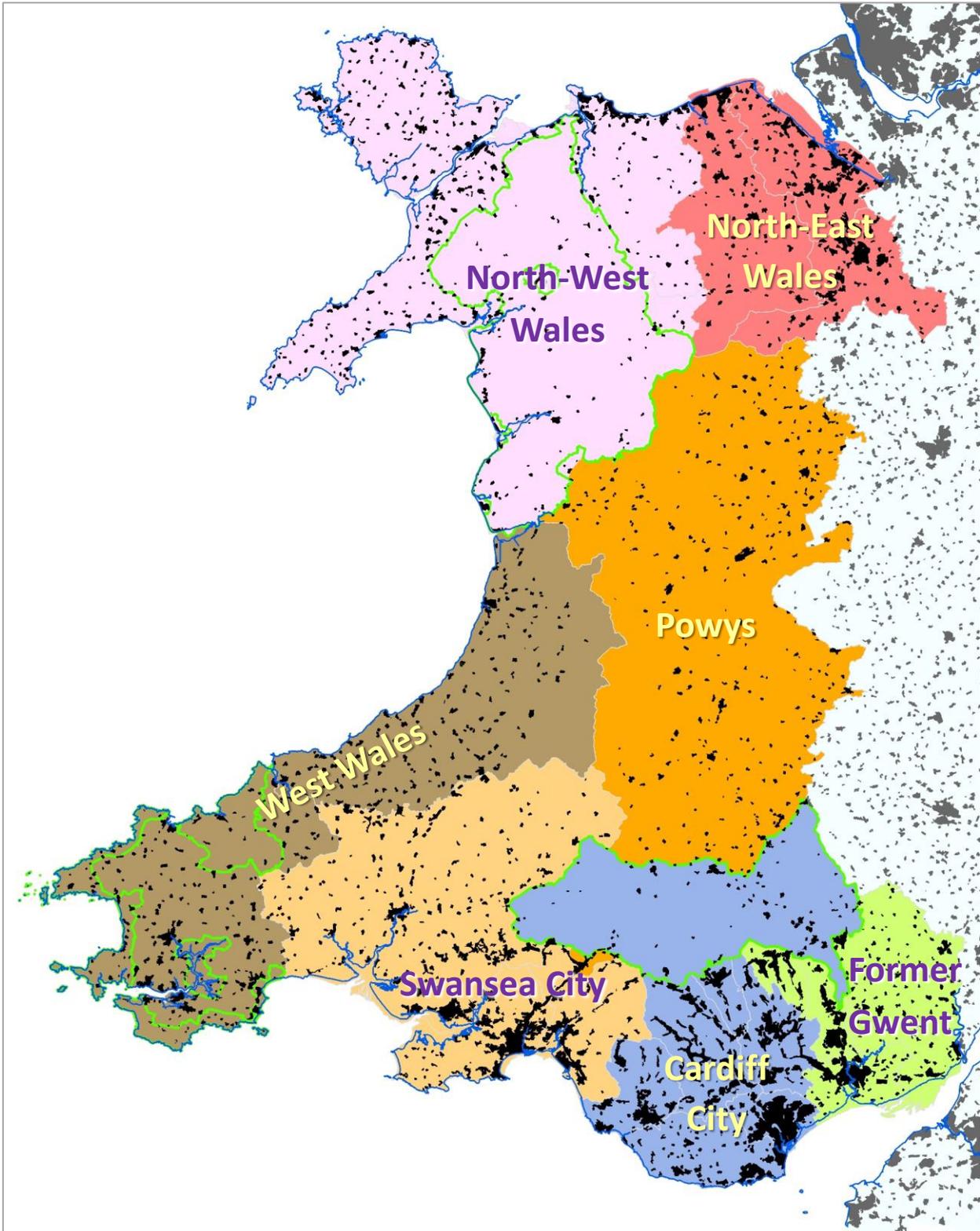
### ***STAGE 2: Calculation of the Regional Split between North Wales and South Wales***

- 5.9 Table 3.1, in Chapter 3, shows how the regional split of primary aggregate sales between North Wales and South Wales has varied only slightly over the baseline period, ranging from 34/66% at one extreme to 41/59% at the other. Over the period as a whole, the average split (calculated from the more detailed and updated figures in Tables 5.2 to 5.5, below) has been **38.26% / 61.74%**
- 5.10 Applying this ratio to the national total from para. 5.7 above gives the following headline apportionments for each of the two regions:
- **North Wales primary land-won aggregates: 7.738 mtpa**
  - **South Wales primary land-won aggregates: 12.486 mtpa**

### ***STAGE 3: Calculation of Sub-Regional and LPA Apportionments***

- 5.11 Stage 3 of the apportionment process requires that the regional figures are apportioned between a series of seven **sub-regions**, created for the purpose of the RTS and, *provided that it is feasible to do so*, between each of the constituent Local Planning Authorities (LPAs).
- 5.12 The sub-regions were created, at Welsh Government's suggestion, for the specific purpose of facilitating strategic minerals planning and collaborative approaches between LPAs. They each represent distinctive 'market areas' between which there is relatively little movement of aggregates, except for exports to England, and within which detailed, strategic consideration can be given as to the most appropriate patterns of supply.
- 5.13 The sub-regions, as listed below, are illustrated in Figure 5.2, which also shows (in black), the main urban areas and (in shades of grey) the neighbouring authorities in England.
- **North West Wales** (comprising Anglesey, Gwynedd, Conwy and the Snowdonia National Park), and
  - **North East Wales** (comprising Denbighshire, Flintshire & Wrexham);
  - **Powys**;
  - **West Wales** (Pembrokeshire, Pembrokeshire Coast National Park and Ceredigion);
  - **Swansea City-Sub-Region** (Swansea, Neath Port Talbot and Carmarthenshire);
  - **Cardiff City Sub-Region** (Cardiff, RCT, Merthyr Tydfil, Caerphilly, Bridgend, the Vale of Glamorgan and the Brecon Beacons National Park); and
  - **'Former Gwent'** (Blaenau Gwent, Torfaen, Newport and Monmouthshire).

**Figure 5.2: Sub-Regional Groupings of Local Planning Authorities in Wales, as determined for the purposes of land-won primary aggregate apportionment**



5.14 The sub-regional groupings, thus defined, provide the basis for dividing the Regional Apportionment figures (from para 5.10, above), between the various groups of LPAs and, where feasible, between individual LPAs. The methodology for doing this, as

agreed by the RTS Steering Group, was based on a combination of quantitative calculations and qualitative judgements, as described below.

- 5.15 Dealing first with the **quantitative data**, it was agreed that the pattern of apportionments should reflect, not only the pattern of historical sales (as had been used in the First Review) but also, where necessary, the pattern of house construction achieved over the baseline period<sup>17</sup>. This would have the added benefit of introducing changes to the supply pattern so that it becomes more aligned with the spatial pattern of observed (and likely future) demand, thereby addressing some of the inequalities that are reflected in the existing (historical) pattern of supply.
- 5.16 Two sets of ‘theoretical’ figures were therefore produced, one relating to historical sales (“Option A”) and one relating to the housing figures (“Option B”). The term ‘theoretical’ is used here to indicate that these are the figures that would result from using only one or the other of the two datasets.
- 5.17 The historical sales data for Option A are derived from Table 3.2, above, using the highest of the 10-year and 3-year averages, for each LPA. In Tables 5.2 and 5.3 below, those figures are then expressed as percentages of the Regional totals and applied to the appropriate Regional figures from Stage 2, above, to obtain the Option A figures shown on the left hand side of the tables.
- 5.18 For Option B, the housing completions data for each LPA, taken from Table 3.3, were initially expressed as percentages of the Regional housing completion totals, in a similar way to the analysis of sales data for Option A. However, applying those percentages to the Regional apportionments from Stage 2 resulted in theoretical LPA figures which were felt to be too far removed from the ‘reality’ of the historical supply pattern. Instead, the process was therefore taken down to the sub-regional level: the housing figures were expressed as percentages of the sub-regional housing totals and applied to the sub-regional apportionment totals obtained from Option A, to give the Option B figures shown in columns 5 to 7 of Tables 5.2 and 5.3. For the purpose of this exercise (only), the two sub-regions in south-east Wales (i.e. Cardiff and Former Gwent) were combined. This was to address the fact that Former Gwent, as a whole, was considered, by the Steering Group, to have been making a relatively limited contribution to the overall supply pattern for many years.
- 5.19 Option A has the advantage of reflecting the existing distribution of supply sources (quarries) and is therefore realistic in terms of ‘deliverability’ but carries the disadvantage of perpetuating the historical supply pattern and the various inequalities contained therein. It represents the preferred option in areas where the historical supply pattern appears to provide a sensible balance between the availability of resources and the location of demand, but requires modification elsewhere.

---

<sup>17</sup> Whilst future housing requirement figures have been used to influence the overall quantum of future supply, in Stage 1 of the Methodology, for Stage 3 it was considered that the housing completion figures, over the baseline period covered by this review, would provide a more reliable metric for the demonstrable spatial pattern of this element of demand.

**Table 5.2: Assessed Sub-Regional and LPA Apportionments, North Wales.**

Local Planning Authority	OPTION A			OPTION B			Preferred Annualised Apportionments (mtpa) <small>[By default = Option A, but modified in some cases (red figures) to allow for Option B or qualitative observations as noted in column to right]</small>	Qualitative Observations
	highest of 10-yr and 3yr Ave. Aggregate Sales (total) (mtpa)	% share of Regional total	Resulting Annualised Apportionments for all Land-Won Primary Aggregates <sup>1</sup> (mtpa)	Annualised House Completions over the baseline period (2007 – 2016)	% share of Sub-Regional total	Resulting Annualised Apportionments for all Land-Won Primary Aggregates <sup>2</sup> (mtpa)		
N. WALES TOTAL (from Stage 2)	<b>7.738</b>							
<b>NE Wales Sub-Region</b>	<b>4.047</b>	<b>65.75%</b>	<b>5.088</b>	<b>749.0</b>	<b>100.00%</b>	<b>5.088</b>	<b>5.088</b>	The existing supply pattern here (Option A) provides an appropriate balance between market forces (including substantial exports) and the availability of unconstrained resources. Flintshire has much higher aggregate sales than Denbighshire, despite similar housing requirements. This reflects local market distortion by exports to NW England. The slight modification shown within the preferred apportionment figures is to make the best use of existing landbanks and thereby reduce future allocation requirements overall. Wrexham supplies only sand & gravel as its limestone resources are largely constrained by the AONB.  The existing supply pattern in NW Wales is well balanced with the distribution of planned housing provision and is unaffected by exports. Option A should therefore be used. Supplies are sourced primarily from outside the National Park and AONBs and are well distributed between the main producing areas of Conwy and Gwynedd, with more limited supplies from Anglesey to local markets.
Denbighshire	0.329	5.35%	0.414	156.2	20.85%	1.061	0.860	
Flintshire	3.204	52.06%	4.028	288.6	38.53%	1.960	3.582	
Wrexham	0.514	8.35%	0.646	304.2	40.61%	2.066	0.646	
<b>NW Wales Sub-Region</b>	<b>2.108</b>	<b>34.25%</b>	<b>2.650</b>	<b>969</b>	<b>100.00%</b>	<b>2.650</b>	<b>2.650</b>	
Conwy + Snowdonia NP	0.955	15.52%	1.201	178.6	39.26%	1.041	1.201	
Gwynedd	0.898	14.59%	1.129	170.4	36.60%	0.970	1.129	
Isle of Anglesey	0.255	4.14%	0.321	109.6	24.14%	0.640	0.321	

**Notes:**

1. The annualised apportionments for Option A were obtained by applying the percentages in column 3 (representing each LPA's share of Regional historic sales totals) by the Regional Apportionment total from Stage 2 (as shown at the top of the table).
2. The annualised apportionments for Option B were obtained by applying the percentages in column 6 (representing each LPA's share of sub-regional housing requirement totals) by the corresponding Sub-regional Apportionment totals from column 4.

**Table 5.3: Assessed Sub-Regional and LPA Apportionments, South Wales.**

Local Planning Authority <i>(see Table 5.2 for footnotes)</i>	OPTION A			OPTION B			Preferred Annualised Apportionments (mtpa) <small>[By default = Option A, but modified in some cases (red figures) to allow for Option B or qualitative observations as noted in column to right]</small>	Qualitative Observations
	highest of 10-yr and 3yr Ave. Aggregate Sales (total) (mtpa)	% share of Regional total	Resulting Annualised Apportionments for all Land-Won Primary Aggregates <sup>1</sup> (mtpa)	Annualised House Completions over the baseline period (2007 – 2016)	% share of Sub-Regional total	Resulting Annualised Apportionments for all Land-Won Primary Aggregates <sup>2</sup> (mtpa)		
S. WALES TOTAL (from Stage 2)	<b>12.486</b>							
<b>West Wales Sub-Region</b>	<b>1.140</b>	<b>12.13%</b>	<b>1.514</b>	<b>366.1</b>	<b>100.00%</b>	<b>1.514</b>	<b>1.514</b>	Some adjustment is required to increase the provision from Ceredigion whilst reducing that from the Pembrokeshire Coast National Park but leaving the total unchanged. Ceredigion currently supplies aggregates in proportion to its share of planned housing at a regional level, but not at the sub-regional level. Provision from this LPA should therefore be increased (to an average of Options A and B), with a corresponding reduction from the National Park.
Ceredigion	0.300	3.19%	0.398	126.1	34.44%	0.521	0.460	
Pembrokeshire	0.510	5.42%	0.677	240	65.56%	0.992	0.677	
Pembrokeshire Coast NP	0.330	3.51%	0.438				0.377	
<b>Swansea Sub-Region</b>	<b>1.292</b>	<b>13.74%</b>	<b>1.716</b>	<b>1,311.5</b>	<b>100.00%</b>	<b>1.716</b>	<b>1.716</b>	The Option A figure for Carmarthenshire should be retained, with the remainder of production (mostly HSA - high PSV sandstone) being divided between Swansea and NPT. Option B addresses the current zero apportionment for Swansea, but realistic opportunities for resource development in Swansea relate only to high PSV sandstone which, at present, is supplied primarily from NPT. Limestone is supplied only from Carmarthenshire, which therefore needs to retain its apportionment from Option A in full, with the balance of apportionments (for sandstone) being shared between Swansea and NPT. The figures shown here for those two LPAs assume an equal split between them. If a different balance is preferred, this would need to be agreed by those LPAs as part of their Statement of Sub-Regional Collaboration.
Carmarthenshire	0.832	8.85%	1.105	517.8	39.48%	0.677	1.105	
Swansea	0.000	0.00%	0.000	519.4	39.60%	0.680	0.305	
Neath Port Talbot	0.460	4.89%	0.611	274.3	20.91%	0.359	0.305	
<b>Powys Sub-Region</b>	<b>2.650</b>	<b>28.19%</b>	<b>3.519</b>	<b>191.7</b>	<b>100.00%</b>	<b>3.519</b>	<b>3.519</b>	Option A provides the most reliable reflection of future demand for Powys, being dominated, as it is, by exports of HSA (high PSV) Aggregates to England. That option is therefore preferred without modification
Powys	2.650	28.19%	3.519	191.7	100.00%	3.519	3.519	

Continued ...

.....Table 5.3 continued	OPTION A			OPTION B			Preferred Annualised Apportionments (mtpa) <small>[By default = Option A, but modified in some cases (red figures) to allow for Option B or qualitative observations as noted in column to right]</small>	Qualitative Observations	
Local Planning Authority <small>(see Table 5.2 for footnotes)</small>	highest of 10-yr and 3yr Ave. Aggregate Sales (total) (mtpa)	% share of Regional total	Resulting Annualised Apportionments for all Land-Won Primary Aggregates <sup>1</sup> (mtpa)	Annualised House Completions over the baseline period (2007 – 2016)	% share of Sub-Regional total <small>(or of combined SE Wales total, for Cardiff &amp; Former Gwent)</small>	Resulting Annualised Apportionments for all Land-Won Primary Aggregates <sup>2</sup> (mtpa)			
<b>Cardiff City Sub-Region</b>	<b>4.070</b>	<b>43.29%</b>	<b>5.405</b>	<b>2,316.9</b>	<b>66.48%</b>	<b>3.814</b>	<b>4.609</b>	ALL of the apportionments within the combined SE Wales area (i.e. the Cardiff sub-region and Former Gwent) need to be adjusted to reflect the fact that Former Gwent, <u>as a whole</u> , has not been supplying its fair share of aggregates for many years (this being largely but not only due to the lack of production in both Torfaen and Newport). Option B addresses this issue by calculating requirements based on % shares of planned housing demand in both sub-regions combined. However, those figures, on their own, do not take account of resource availability. <b>The preferred figures are therefore the average of Options A and B.</b> In the case of BBNP and Merthyr, where that calculation provides only a combined figure (= 0.567mtpa), it is suggested that Merthyr should retain the Option A figure of 0.199mtpa, with the balance of 0.368mtpa being assigned to the National Park.	
Brecon Beacons NP	0.540	5.74%	0.717	133.2	3.82%	0.219	0.368		
Merthyr Tydfil	0.150	1.60%	0.199				0.199		
Bridgend	0.600	6.38%	0.797	365	10.47%	0.601	0.699		
Rhondda Cynon Taf	0.670	7.13%	0.890	373.9	10.73%	0.615	0.753		
Vale of Glamorgan	0.660	7.02%	0.876	284.3	8.16%	0.468	0.672		
Caerphilly	0.390	4.15%	0.518	335.2	9.62%	0.552	0.535		
Cardiff	1.060	11.27%	1.408	825.3	23.68%	1.359	1.383		
<b>Former Gwent Sub-Region</b>	<b>0.250</b>	<b>2.66%</b>	<b>0.332</b>	<b>1,168.2</b>	<b>33.52%</b>	<b>1.923</b>	<b>1.128</b>		The figures shown for the Former Gwent LPAs are simply averages of Options A and B. Torfaen and Newport currently have zero apportionments and the feasibility of being able to make future provision in those areas needs to be examined in greater detail by those Authorities. If the balance of supply needs to depart from these figures (but without reducing the sub-regional total), this would need to be agreed by all four LPAs as part of their Statement of Sub-Regional Collaboration.
Blaenau Gwent	0.180	1.91%	0.239	99.1	2.84%	0.163	0.201		
Monmouthshire	0.070	0.74%	0.093	228.6	6.56%	0.376	0.235		
Newport	0.000	0.00%	0.000	527.5	15.14%	0.868	0.434		
Torfaen	0.000	0.00%	0.000	313	8.98%	0.515	0.258		

- 5.20 Option B, based purely on the distribution of planned housing activity, theoretically provides a way of changing the pattern of supply to one that is more equitable, and in line with the distribution of a very significant element of demand (i.e. house building and associated other construction), but takes no account of the spatial pattern of geological resources or existing quarries. On its own, this would be wholly inappropriate as a future supply strategy as it would not be deliverable within the timescale required, since it requires supplies to be provided from areas with no existing quarries. It does, however, provide a useful indication of the ‘direction of travel’ that may be needed in order to improve the existing pattern of supply from a sustainability perspective.
- 5.21 In practice, where the supply pattern was considered to be in need of adjustment to achieve an improved balance, the two sets of figures were combined (by taking the average of Options A and B, for each LPA). In each of the tables, the **preferred option** (usually either option A or the average of A and B) are shown in the eighth column. In a few cases, however, further adjustments were required on the basis of more nuanced **qualitative judgements**, as described in the right-hand column of the tables.
- 5.22 Decisions regarding which option to select for each LPA, and qualitative judgements regarding other factors which needed to be taken into account, were made by the RTS Steering Group through a process of round-table discussion. Importantly, the analysis and discussions were focused on each of the self-contained sub-regional areas in turn, so as to achieve a preferred balance of supply within each of those areas, whilst not disturbing the broader-scale pattern of supply within each Region as a whole. The only exception to this was in South-East Wales where, as noted earlier, the two sub-regions (Cardiff and Former Gwent) were combined for the quantitative stage of analysis.
- 5.23 The summaries given in the right hand column of Tables 5.2 and 5.3 describe the main reasoning for selecting the preferred distribution of apportionments within each sub-region. Fuller explanations, including details of the consideration given to the distribution of resources, practicalities of mineral extraction, major constraints (National Parks and AONBs), environmental capacity and the proximity principle, are given within the Regional Appendices.

#### ***STAGE 4: Sand & Gravel / Crushed Rock Split and Allocations for Future Working***

- 5.24 The final stage of the RTS process relates to the separation of each LPA’s apportionment figure by aggregate type (i.e. natural sand & gravel, and crushed rock), and then comparison of the total requirements for each of those, over the relevant Plan periods, with the current stock of permitted reserves, in order to determine whether or not new allocations are required to meet any shortfalls. Tables 5.4 to 5.7 below present the data and calculations involved.

**Table 5.4: Calculation of Allocations Required for Land-won Sand & Gravel Aggregates – North Wales**

Local Planning Authority	Overall 'Preferred' Apportionment (S&G & CR) <sup>1</sup> (mt)	Historic proportion supplied from sand & gravel sources <sup>2</sup>	New Annualised Apportionment for sand & gravel <sup>3</sup> (mt)	Total Apportionment Required over 22 years	Existing permitted reserves at end of 2016 in mt <sup>4,5</sup>	Existing landbank <sup>6</sup> (years)	Surplus or Shortfall (-) of Existing Permitted Reserves (mt)	Minimum Allocation needed to meet Required Provision <sup>7</sup> (mt)	Additional reserves at Dormant sites, 2016 <sup>4</sup> (mt)
Denbighshire	0.860	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Flintshire	3.582	6.23%	0.223	4.912	1.369	6.1	-3.543	3.543	0.5
Wrexham	0.646	100.00%	0.646	14.217	12.652	19.6	-1.565	1.565	0
Conwy + Snowdonia NP	1.201	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Gwynedd	1.129	15.44%	0.174	3.834	1.175	6.7	-2.659	2.659	0
Isle of Anglesey	0.321	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
<b>Sub-totals, North Wales</b>	<b>7.738</b>	<b>13.40%</b>	<b>1.044</b>	<b>22.963</b>	<b>15.196</b>		<b>-7.767</b>	<b>7.767</b>	<b>0.5</b>

## NOTES:

1 Taken from Tables 5.2 (North Wales) or Table 5.3 (South Wales)

2 Based on RAWP data over the 10-year baseline period (2007 – 2016)

3 Assumes that the historic proportion is maintained, with the exception of the Pembrokeshire Coast National Park where a slight adjustment has been made to avoid the need for allocations.

4 Data provided by the RAWP secretary for December 2016

5 Permitted reserves exclude those at dormant sites.

6 Landbanks = stock of permitted reserves at active and inactive sites, expressed in terms of the annualised apportionment

7 Allocations required = calculated shortfall, if any.

8. The sand & gravel allocations needed for Ceredigion could potentially be provided, in part, from resources in neighbouring parts of Carmarthenshire, despite being in a different sub-region.

Where allocation requirements are shown these are the minimum amounts required to meet the RTS requirements. In many cases an application for an individual new permission will exceed these amounts, in the interests of economic viability. Such applications should not be rejected purely on the grounds of exceeding the minimum requirements shown here. In some cases, the suggested allocations may already have been partially or entirely fulfilled, either by new permissions granted since December 2016, or by allocations that have already been identified in LDPs. Further details are given in the Regional Appendices.

**Table 5.5: Calculation of Allocations Required for Land-won Sand & Gravel Aggregates – South Wales.**

Local Planning Authority <small>*see Table 5.4 for footnotes</small>	Overall 'Preferred' Apportionment (S&G & CR) <sup>1</sup> (mt)	Historic proportion supplied from sand & gravel sources <sup>2</sup>	New Annualised Apportionment for sand & gravel <sup>3</sup> (mt)	Total Apportionment Required over 22 years	Existing permitted reserves at end of 2016 in mt <sup>4,5</sup>	Existing landbank <sup>6</sup> (years)	Surplus or Shortfall (-) of Existing Permitted Reserves (mt)	Minimum Allocation needed to meet Required Provision <sup>7</sup> (mt)	Additional reserves at Dormant sites, 2016 <sup>4</sup> (mt)
Ceredigion	0.460	36.67%	0.188	4.136	0.510	2.7	-3.626	3.626	0
Pembrokeshire	0.677	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Pembrokeshire Coast NP	0.377	36.36%	0.118	2.600	2.600	22	0.000	0.000	0
Carmarthenshire	1.105	0.24%	0.003	0.058	0.100	37.7	0.042	See note 8 below Table 5.4	0.35
Swansea	0.305	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Neath Port Talbot	0.305	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Powys	3.519	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Brecon Beacons NP	0.368	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Merthyr Tydfil	0.199	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Bridgend	0.699	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Rhondda Cynon Taf	0.753	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Vale of Glamorgan	0.672	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Caerphilly	0.535	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Cardiff	1.383	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Blaenau Gwent	0.201	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Monmouthshire	0.235	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Newport	0.434	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Torfaen	0.258	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
<b>Sub-totals, South Wales</b>	<b>12.485</b>	<b>2.96%</b>	<b>0.309</b>	<b>6.784</b>	<b>3.21</b>			<b>3.626</b>	<b>0.35</b>
<b>TOTALS Wales</b>	<b>20.224</b>	<b>6.95%</b>	<b>1.353</b>	<b>29.758</b>	<b>18.406</b>			<b>11.394</b>	<b>0.85</b>

**Table 5.6: Calculation of Allocations Required for Crushed Rock Aggregates – North Wales.**

Local Planning Authority	Overall 'Preferred' Apportionment (S&G & CR) <sup>1</sup> (mt)	Historic proportion supplied from crushed rock sources <sup>2</sup>	New Annualised Apportionment for crushed rock <sup>3</sup> (mt)	Total Apportionment Required over 25 years	Existing permitted reserves at end of 2016 in mt <sup>4,5</sup>	Existing landbank <sup>6</sup> (years)	Surplus or Shortfall (-) of Existing Permitted Reserves (mt)	Minimum Allocation needed to meet Required Provision <sup>7</sup> (mt)	Additional reserves at Dormant sites, 2016 <sup>4</sup> (mt)
Denbighshire	0.860	100.00%	0.860	21.500	21.710	25.2	0.210	0.000	0
Flintshire	3.582	93.77%	3.359	83.968	48.040	14.3	-35.928	35.928	1.41
Wrexham	0.646	0.00%	0.000	0.000	0.000	n/a	0.000	0.000	0
Conwy + Snowdonia NP	1.201	100.00%	1.201	30.016	62.500	52.1	32.484	0.000	0.25
Gwynedd	1.129	84.56%	0.955	23.867	28.540	29.9	4.673	0.000	0
Isle of Anglesey	0.321	100.00%	0.321	8.015	14.400	44.9	6.385	0.000	0
<b>Sub-totals, North Wales</b>	<b>7.738</b>	<b>86.60%</b>	<b>6.695</b>	<b>167.366</b>	<b>175.19</b>			<b>35.928</b>	<b>1.66</b>

## NOTES:

1 Taken from Tables 5.2 (North Wales) or Table 5.3 (South Wales)

2 Based on RAWP data over the 10-year baseline period (2007 – 2016)

3 Assumes that the historic proportion is maintained, with the exception of the Pembrokeshire Coast National Park where a slight adjustment has been made to avoid the need for allocations.

4 Data provided by the RAWP secretary for December 2016

5 Permitted reserves exclude those at dormant sites.

6 Landbanks = stock of permitted reserves at active and inactive sites, expressed in terms of the annualised apportionment

7 Allocations required = calculated shortfall, if any.

Where allocation requirements are shown these are the minimum amounts required to meet the RTS requirements. In many cases an application for an individual new permission will exceed these amounts, in the interests of economic viability. Such applications should not be rejected purely on the grounds of exceeding the minimum requirements shown here. In some cases, the suggested allocations may already have been partially or entirely fulfilled, either by new permissions granted since 2016, or by allocations that have already been identified in LDPs. Further details are given in the Regional Appendices.

**Table 5.7: Calculation of Allocations Required for Crushed Rock Aggregates – South Wales.**

Local Planning Authority <small>*see Table 5.6 for footnotes</small>	Overall 'Preferred' Apportionment (S&G & CR) <sup>1</sup> (mt)	Historic proportion supplied from crushed rock sources <sup>2</sup>	New Annualised Apportionment for crushed rock <sup>3</sup> (mt)	Total Apportionment Required over 25 years	Existing permitted reserves at end of 2016 in mt <sup>4,5</sup>	Existing landbank <sup>6</sup> (years)	Surplus or Shortfall (-) of Existing Permitted Reserves (mt)	Minimum Allocation needed to meet Required Provision <sup>7</sup> (mt)	Additional reserves at Dormant sites, 2016 <sup>4</sup> (mt)
Ceredigion	0.460	63.33%	0.272	6.798	5.370	19.7	-1.428	1.428	0
Pembrokeshire	0.677	100.00%	0.677	16.932	16.720	24.7	-0.212	0.212	0
Pembrokeshire Coast NP	0.377	63.64%	0.259	6.475	10.370	40.0	3.895	0.000	0
Carmarthenshire	1.105	99.76%	1.102	27.556	59.900	54.3	32.344	0.000	13.82
Swansea	0.305	n/a	0.305	7.636	0.000	0.0	-7.636	7.636	0
Neath Port Talbot	0.305	100.00%	0.305	7.636	16.480	54.0	8.844	0.000	0
Powys	3.519	100.00%	3.519	87.981	139.240	39.6	51.259	0.000	0
Brecon Beacons NP	0.368	100.00%	0.368	9.200	120.100	211.8	105.925	0.000	0.36
Merthyr Tydfil	0.199	100.00%	0.199	4.975					
Bridgend	0.699	100.00%	0.699	17.471	27.270	39.0	9.799	0.000	0.15
Rhondda Cynon Taf	0.753	100.00%	0.753	18.816	9.830	13.1	-8.986	8.986	0
Vale of Glamorgan	0.672	100.00%	0.672	16.806	18.730	27.9	1.924	0.000	13
Caerphilly	0.535	100.00%	0.535	13.371	31.280	58.5	17.909	0.000	5.21
Cardiff	1.383	100.00%	1.383	34.578	27.800	20.1	-6.778	6.778	0
Blaenau Gwent	0.201	100.00%	0.201	5.027	1.320	6.6	-3.707	3.707	0
Monmouthshire	0.235	100.00%	0.235	5.866	11.250	47.9	5.384	0.000	0
Newport	0.434	n/a	0.434	10.854	0.000	0.0	-10.854	10.854	0
Torfaen	0.258	n/a	0.258	6.441	0.000	0.0	-6.441	6.441	0
<b>Sub-totals, South Wales</b>	<b>12.485</b>	<b>97.04%</b>	<b>12.176</b>	<b>304.420</b>	<b>495.66</b>			<b>46.043</b>	<b>32.54</b>
<b>TOTALS Wales</b>	<b>20.224</b>	<b>93.05%</b>	<b>18.872</b>	<b>471.786</b>	<b>670.850</b>			<b>81.971</b>	<b>34.20</b>

- 5.25 The requirements, as set out in paragraph 49 of MTAN1, are that a minimum 10-year landbank of crushed rock and a minimum 7-year landbank for sand and gravel should be maintained throughout the entire plan period of each LDP. In effect, this means having a minimum landbank for sand & gravel of 22 years, at the start of a 15-year Plan period, and a minimum crushed rock landbank of 25 years. In each case, the landbank is required, by MTAN 1 to be based on an average of the most recent 3 years' production figures. That was modified, in the RTS First Review, to be based on an average of 10-years production figures, since that was adopted as the main guide for future levels of demand. For the present review, a further modification is needed, such that the landbank is expressed in terms of the annualised apportionment figure recommended for each LPA. In all cases, these are higher than the 10-year or 3-year historical sales averages, and the landbanks are therefore correspondingly reduced, increasing the likelihood for new allocations being required. It must be emphasised, however, that at the start of any given Plan period, the overall provision (total apportionment) can be represented by a combination of existing landbanks of permitted reserves and (where necessary) new allocations (subject to the minimum landbank figures being available).

#### Sand & Gravel / Crushed Rock Aggregates Split

- 5.26 In order to carry out the required calculations, it was necessary first to distinguish between natural sand & gravel and crushed rock requirements. To do this, it has been assumed that the new apportionments will be divided between the two aggregate types in the same ratio as shown by the historical sales data, over the 10-year baseline period. One exception to this has been The Pembrokeshire Coast National Park where the apportionment has been reduced slightly, so as not to exceed the remaining landbank of permitted reserves. This has been to avoid the necessity of requiring new allocations to be identified within the National Park<sup>18</sup> and has been achieved by a corresponding slight increase in the apportionment for Ceredigion, and with corresponding changes to the crushed rock apportionments in order to maintain the overall apportionments for each area.
- 5.27 Theoretically, there may sometimes be opportunities to achieve the overall requirements with a different balance of aggregate types – for example where there is a surplus of permitted crushed rock reserves but a shortage of sand & gravel. In practice, however, this combination of circumstances occurs in only one LPA – Gwynedd. Even in that area, the substitution may not be appropriate, depending on the particular end-uses involved. The reverse situation, where there are surpluses of permitted sand & gravel reserves, is found only in Carmarthenshire. In that case, however, there is a much larger surplus of crushed rock, so no necessity for substitution to occur.

#### Surpluses, Shortfalls and Allocations

- 5.28 For **land-won sand & gravel**, Tables 5.4 and 5.5 reveal that new allocations to meet RTS requirements over the next 22 years will be required within Flintshire, Wrexham, Gwynedd and Ceredigion. Current landbanks, expressed in terms of the

<sup>18</sup> MTAN 1 (para 52) seeks to avoid new allocations within National Parks, save in exceptional circumstances.

new annualised apportionments, are already less than the minimum level of 7 years in three of these areas, demonstrating the urgency for granting new permissions, as well as longer-term allocations for future working. In the fourth area (Wrexham), the landbank is currently adequate, at just under 20 years, but a further allocation is needed to meet the RTS requirement over the full plan period.

- 5.29 Only one LPA in the whole of Wales (Carmarthenshire) currently has a surplus of existing permitted reserves of sand & gravel. The remaining LPAs have neither a surplus nor deficit for sand & gravel provision but, in most cases, this is simply because they currently have no production and no apportionment. An exception to this is the Pembrokeshire Coast National Park which (as a consequence of ensuring that it's apportionment will not exceed the current landbank) has just sufficient reserves to cover the 22-year period required. In future years, the requirement which has hitherto fallen on the National Park will need to be supplied by other adjoining areas. In South East Wales, the zero requirements for land-won sand & gravel production are critically dependent upon the continued availability of marine-dredged aggregates. If that source of supply were to be disrupted, there would be an urgent need to reconsider the apportionments to all of the authorities in that area.
- 5.30 For **crushed rock**, Tables 5.6 and 5.7 reveal that many parts of Wales already have substantial permitted reserves of crushed rock, with landbanks in excess of the required minimum of 25 years. However, shortfalls of permitted reserves, with corresponding requirements for new allocations and/or new permissions, are identified in nine separate LDP areas.
- 5.31 Three of these (Swansea, Newport and Torfaen) correspond to the areas which previously had zero apportionments, and where new sources of supply now need to be found, either within those areas or, if it cannot be avoided, in neighbouring parts of the same sub-regions (subject to the preparation of Statements of Sub-Regional Collaboration with the other LPAs, in accordance with the guidelines set out in Annex A of this document). In the case of Swansea, the reserves requirement (specifically for HSA (high PSV) sandstone) could *theoretically* be subsumed within the surplus available in adjoining Neath Port Talbot, though that would defeat the objective of seeking a more equitable sub-regional balance. For Newport and Torfaen, part of their combined requirement of almost 17.3 million tonnes could *theoretically* be offset by the surplus of almost 5.4 million tonnes in Monmouthshire<sup>19</sup>, although that would still leave a considerable deficit and again would defeat the objective of seeking a more equitable balance. The word 'theoretically' is italicised in these observations because it is not the intention of the RTS to encourage the 'trading' of apportionments between LPAs, other than in *exceptional circumstances*, as set out in the Guidelines at Annex A.
- 5.32 The six other LPAs with shortfalls of permitted crushed rock reserves are Flintshire, Ceredigion, Pembrokeshire, Rhondda Cynon Taf, Cardiff and Blaenau Gwent. In the case of RCT and the Cardiff, the combined shortfall of more than 15.7 mt is dwarfed

<sup>19</sup> The surplus reserves in Monmouthshire are bound up in a single site which has been inactive for many years and are constrained, in part, by the need for dewatering the Carboniferous Limestone aquifer, which would be subject to abstraction licensing requirements.

by the net surplus of almost 120 mt within the Cardiff City sub-region as a whole, though most of that lies within the Brecon Beacons National Park and the RTS seeks to reduce, rather than increase, the dependency on that area for future supply. The shortfall in RCT is matched by the slightly larger surplus in Bridgend, whilst that in Cardiff is more than matched by the surplus in Caerphilly. Once again, however, to rely on those reserves instead of finding new allocations as indicated in Table 5.7 would defeat the objective of seeking a more sustainable long-term pattern of supply in the area and is therefore not encouraged.

- 5.33 The remaining LPA facing a shortfall of permitted crushed rock reserves – Blaenau Gwent – falls within the same ‘Former Gwent’ sub-region as Torfaen, Newport and Monmouthshire which, even combined, have a net shortfall of more than 15.6 mt.

#### Types and Size of Allocations

- 5.34 A key requirement, in terms of identifying allocations for future working within an LDP, is to be able to demonstrate that adequate provision has been made for supplying *at least* the minimum quantity identified for the authority in the RTS (or in a SSRC where a different figure has been agreed through sub-regional collaboration). This, in turn, means that the quantity of workable mineral within the allocation needs to be known, as far as possible. In most cases, this is only likely to be feasible within Specific Sites. Preferred Areas will generally not have sufficient information to be able to do this, though it may sometimes be possible for reasonable estimates to be made.
- 5.35 In each case, where sufficiently detailed information exists, it is therefore recommended that the allocations should take the form of **Specific Sites**, as defined in Paragraph 5.14.19 of Planning Policy Wales (PPW) i.e. *“where mineral resources of commercial significance exist, and where any planning applications which come forward for those sites are likely to be acceptable in planning terms”*. In terms of size, Specific Sites should aim, not simply to deliver the bare minimum identified as an allocation requirement in the RTS (or SSRC) but may need to be larger: they will need to be of sufficient size to be commercially viable.
- 5.36 Where Specific Sites cannot be defined, allocations should normally at least take the form of **Preferred Areas** (*“areas of known resources with some commercial potential, and where planning permission might reasonably be anticipated”*), within which operators should be encouraged to bring forward more specific proposals. Inevitably, for a given minimum size of allocation, such areas will need to be significantly larger than individual sites, in recognition of the fact that only part of the area may eventually be brought forward.
- 5.37 **Areas of Search** (*“...broad areas that are believed to contain mineral resources of commercial significance but whose extent is uncertain...”*) will usually have only minimal information on the suitability and commercial viability of the resources for commercial development and, as noted in PPW, it will not usually be appropriate to only rely on these for the purposes of making allocations. There will be some situations, however, where there is insufficient knowledge about potential resources to identify anything other than Areas of Search. Where this is the case, it

is recommended that the Area(s) so identified should provide the potential for the release of new permitted reserves which are far greater than the minimum allocation recommended, in order to allow for the uncertainties involved.

- 5.38 In some cases, it may be better, in terms of deliverability, to rely on specific sites (whether existing permissions or new allocations) in neighbouring authorities (additional to those LPAs' own requirements), where such reliance has been agreed through collaborative working and formalised within an agreed SSRC (see para. 1.27, above), in preference to relying upon the uncertainty associated with broad Areas of Search.

#### Treatment of Dormant Sites

- 5.39 As noted in Chapter 2 (para. 2.4), where an LPA considers that the permitted reserves at dormant sites are likely to be capable of being worked in the relevant period (subject to Environmental Impact Assessment and the agreement of modern conditions) it may be possible for those reserves to be offset against the requirement for new allocations. This would only work, however, if the sites in question meet the same expectations as for other allocations, i.e. that they comply with the definition of Specific Sites or at least Preferred Areas, as given in PPW.

#### Compliance with and Departures from RTS Recommendations

- 5.40 The outcome of this strategic exercise has been a deliberate attempt to control, and in some cases to modify, the future pattern of supply of land-won primary aggregates in Wales, in line with sustainability principles. In a small number of areas, notably where there has been no production of land-won aggregates for many years, with no permitted reserves and zero apportionments, the Steering Group accepted that there may be insufficient evidence, at present, to determine the precise levels of apportionment and resulting allocations required for individual LPAs. In such cases, more detailed analysis will be required, at the local level, through collaboration between adjoining LPAs and consultation with industry, in order to confirm realistic figures for those particular LPAs and (*in exceptional circumstances*) to consider the possibility of alternative patterns of supply within the sub-region concerned.
- 5.41 To this end (and more generally, to ensure that the regional and sub-regional totals recommended by the RTS are achieved), this Review has introduced a requirement for all LPAs within each sub-region to produce Statements of Sub-Regional Collaboration (SSRCs), in consultation with industry, through the RAWPs, prior to the Examination of any individual LDP within that area. Specific guidelines relating to the preparation of SSRCs, including details of the exceptional circumstances tests, are provided at Annex A of this document.
- 5.42 Finally, it should be noted that the recommendations made in this Chapter are based on currently available information regarding permitted reserves, production, proximity and environmental capacity. As noted in 'Box 1' of the original RTS documents, and repeated in the First Review, the suggested apportionments and allocations do not take fully into account all factors that may be material to the

ensuring an adequate supply of aggregates obtained from appropriately located sources. Such factors may, *inter alia*, include such things as:

- The technical capability of one type of aggregate to interchange for another;
- The relative environmental cost of substitution of one type of aggregate by another;
- The relative environmental effects of changing patterns of supply; and
- Whether adequate production capacity can be maintained to meet the required level of supply.

5.43 For such reasons, and as already noted in Chapter 1 (para. 1.29), where it is justified by new (e.g. more up to date, more detailed or more precise) evidence, it is open for individual LPAs to depart from the apportionment and allocation figures recommended by the RTS when preparing their LDP policies. In doing so, however, an LPA would need to demonstrate that their intended departure would not undermine the overall strategy provided by the RTS itself (e.g. by working together with other LPAs within the same sub-region to ensure that sub-regional and regional totals are still achieved) and this would need to be reflected in the SSRC agreed with neighbouring LPAs for that area, prior to Examination.

5.44 Where the local authorities involved are unable to reach agreement, or if individual local authorities do not accept the revised Regional Technical Statement, the Welsh Government will, as a last resort, consider its default powers to intervene in the Development Plan process (MTAN 1, paragraph A3).

## 6. Consultation Process

- 6.1 This First Review of the RTS documents for North Wales and South Wales has been undertaken as a collaborative exercise with several stages of consultation and technical peer review.
- 6.2 At the outset of the project, initial consultation meetings were held with a range of stakeholders to ensure that the Review was properly focused and that key sources of information were made available for consideration. The organisations and/or representative individuals consulted were as follows:
- Hugh Towns, Secretary of the South Wales Regional Aggregates Working Party
  - Gary Nancarrow, Secretary of the North Wales Regional Aggregates Working Party
  - Nick Horsley and others, representing the Mineral Products Association (MPA)
  - Trefor Evans representing the British Aggregates Association (BAA)
  - Ian Gorton and others, representing Natural Resources Wales (NRW)
- 6.3 The findings of this early stage of consultation are detailed in the Interim Report, issued on 18<sup>th</sup> January 2019 (pdf copies available on request from the author).
- 6.4 Initial drafts of the revised RTS were then produced in stages between May and August 2019. At each stage, consultation was held with a Project Steering Group made up of the RTS sub-committees of the two Regional Aggregate Working Parties (including mineral operators, mineral planning authorities and Natural Resources Wales). This consultation entailed issuing drafts for comment, Steering Group meetings chaired by Joanne Smith of the Welsh Government, and the preparation of revised drafts incorporating responses to all Steering Group comments received, including the receipt of new technical data. Each successive draft superseded previous versions.
- 6.5 The second draft was issued to the entire membership of both RAWPs and comments on that version were received at a joint North Wales and South Wales RAWP meeting in July 2019.
- 6.6 Following discussion at that meeting, and written comments received from members, a third draft was produced. English and Welsh versions were then issued for wider (public) consultation and drawn to the attention of all Local Planning Authorities in Wales, by the Welsh Government's Chief Planner. Those versions were made available via the Websites of both RAWPs for an eight-week consultation period, between 30<sup>th</sup> September and 25<sup>th</sup> November, 2019. Within that period, two consultation events were held, on 11<sup>th</sup> November at Bridgend in South Wales and on 15<sup>th</sup> November at Llandudno Junction in North Wales. At each event, the RTS review process was clearly explained and the findings, including recommendations to individual LPAs, were presented for discussion and comment. This was the main opportunity for interested parties to scrutinise the documents and to be satisfied that they were acceptable and fit for purpose, taking account of local and sub-regional perspectives.

- 6.7 Following consultation, additional meetings were held with a number of LPAs in South Wales, and with representatives of the Mineral Products Association, to discuss particular concerns relating to sub-regional collaboration and to finalise guidance on this (which had been called for during consultation). A consultation report, which included the Steering Group's recommended responses to the various issues raised by consultees, was produced in June 2020.
- 6.8 A further revision of the RTS (this document and the two Regional Appendices) was then carried out to reflect the recommendations of the consultation report and to incorporate the finalised version of the guidance, (Annex A).
- 6.9 The final edition will be translated into Welsh and issued for endorsement by individual LPAs, after which it will be endorsed for publication by the Welsh Government.
- 6.10 As with previous editions of the RTS, in the interests of sustainability, it is not intended that printed copies will be issued.

## References

Arup, (2003): ***Establishing a Methodology for Assessing Aggregates Demand and Supply (EMAADS)***. Report for the Welsh Assembly Government.

Cuesta Consulting Limited (2009): ***Former Gwent Aggregates Safeguarding Study***. Report to Torfaen Borough Council; Blaenau Gwent Borough Council; Newport City Council; and Monmouthshire County Council. (20pp).

Enviros Consulting Ltd., (2005): ***Implementing the Methodology for Assessing the Environmental Capacity for Primary Aggregates (IMAECA)***. Report for the Welsh Assembly Government.

Harris, K., Higgs, J., Poole, J. & Thompson, A. (2008): ***Evaluation of the Regional Aggregate Working Parties (RAWPs) in Wales***. Report to the Welsh Assembly Government. Capita Symonds Limited, East Grinstead. (48pp + appendices).

Humpage, A.J. & Bide, T.P. (2010): ***The Mineral Resource Maps of Wales***. BGS Open Report OR/10/032 (49pp).

Independent Advisory Group (2012): ***Towards a Welsh Planning Act: Ensuring the Planning System Delivers***. Report to the Welsh Government (125pp + List of Recommendations and Appendices).

Land Use Consultants (2012): ***Delivery of Planning Services in Statutory Designated Landscapes in Wales***. Report to the Planning Division of the Welsh Government. (64pp + Appendices)

Mankelov J M, Bide T P, Sen M A, Raycraft E and Cameron D G. (2016): ***Collation of the results of the 2014 Aggregate Minerals Survey for England and Wales***. British Geological Survey Commissioned Report, OR/16/005. 160pp

North Wales RAWP (2008): ***Regional Technical Statement for the area covered by the North Wales Regional Aggregates Working Party***.

Owen, K., Grantham, J., Bate, R. & Mankelov, J. (2011): ***Proposed toolkit for developing aggregate apportionment options*** (ASRP 2/8). Final report to the Minerals Industry Research Organisation. Land Use Consultants, 195pp

South Wales RAWP (2008): ***Regional Technical Statement for the area covered by the South Wales Regional Aggregates Working Party***. October 2008. (178pp).

Thompson, A., Greig, J.R., and Shaw, J. (1993): ***High Specification Aggregates for Road Surfacing Materials: Technical Report***. Department of the Environment. Travers Morgan Limited, East Grinstead. (270pp).

Thompson, A., Hine, P.D., Marsay, A. and Clayton.J. (2000): ***Appraisal of Land Based Sand and Gravel Resources in South-East Wales***. National Assembly for Wales Research Report. Symonds Group Ltd., East Grinstead. (65pp plus Appendices).

Thompson, A., Knapman, D. & Pethick, J. (2002): ***Comparative Impact Assessment of Land & Marine Sand & Gravel in South East Wales***. Report to the Welsh Assembly Government. Symonds Group Limited, East Grinstead. (68pp + Appendices)

Thompson, A., Burrows, A, Flavin, D. and Walsh, I., (2004): ***The Sustainable Use of High Specification Aggregates in England***: Report to the Office of the Deputy Prime Minister and the Minerals Industry Research Organisation.

Thompson, A., and Birch, J. (2009): ***An Ecosystems Approach to Long Term Minerals Planning in the Mendip Hills, Phase 1: Initial Feasibility Study***. Report to Somerset County Council and Natural England, March 2009. Cuesta Consulting Limited, Uckfield, East Sussex. (47pp)

Thompson, A., Knapman, D., Harris, K., Birch, J. and Jarvis, D. (2010): ***An Ecosystems Approach to Long Term Minerals Planning in the Mendip Hills. Phase II Final Report***. Report to Defra and the Minerals Industry Research Organisation. Published by Capita Symonds Ltd., East Grinstead. (40pp + appendices).

UK Minerals Forum (2009): ***Carbon and proximity in minerals working group report*** (9pp).

University of Liverpool (Geomorphology and Engineering Geology Group), (2003): ***The Sand and Gravel Resources of North West Wales***. Report for the National Assembly for Wales. (76pp + Appendices)

WRAP (2005): ***Quality Protocol for the Production of Aggregates from Inert Waste*** (revised edition, September 2005). The Waste and Resources Action Programme, Banbury.

Wrighton, C.E. & Humpage, A.J. (2012): ***Aggregates Safeguarding Maps of Wales***. BGS Commissioned Report CR/12/039N. (20pp).

## Annex A: Guidance Note on Sub-Regional Collaboration

This Second Review of the Regional Technical Statements for Aggregates Provision in Wales (RTS) introduces a new requirement for all LPAs to agree **Statements of Sub-Regional Collaboration** (SSRCs) in respect of their contributions to the future provision of land-won primary aggregates. In response to suggestions received during the public consultation of the 2<sup>nd</sup> Review, the following Guidance has been prepared on behalf of the Welsh Government and the two Regional Aggregate Working Parties, in consultation with the project Steering Group.

SSRCs are required to be prepared, collaboratively, by all constituent LPAs within each RTS sub-region (as defined by the RTS 2<sup>nd</sup> Review) as part of the evidence base needed to support each Local Development Plan (LDP) or Strategic Development Plan (SDP). The timescale for preparing SSRCs will therefore need to be geared towards the timescale for the earliest LDP (or SDP) submission within that sub-region. Once agreed, an SSRC will remain in place until it becomes superseded by the requirements of future reviews of the RTS, or new information comes forward which justifies a change.

By default, each SSRC will simply confirm that all constituent LPAs within a particular RTS sub-region accept the individual apportionments for aggregates for their individual Authority areas, as set out in the latest Review of the RTS, and that (*as a minimum*) the RTS requirements for that sub-region as a whole will therefore be met.

In exceptional circumstances, an SSRC may identify an alternative pattern of supply which achieves the RTS requirements for that particular sub-region in a different way. Such circumstances may arise either where one or more LPAs within the sub-region are unable to meet the minimum requirements of their apportionments identified in the RTS or where an alternative, achievable and more sustainable pattern of supply is identified through collaboration between the LPAs involved.

The following considerations will apply, in such circumstances:

1. **Inability to meet RTS apportionments:** In order to demonstrate an inability to meet RTS apportionments, an LPA would need to show either that it has no (or insufficient) workable aggregate resources of the type required by the RTS and/or that there is no interest from the minerals industry in developing such resources within the area. It will *not* be sufficient simply to demonstrate that the area has no existing quarries or no recent production, or that alternative resources and/or permitted reserves exist within another LPA.
2. **An alternative pattern of supply:** Where an alternative pattern of supply is proposed this will entail transferring some or all of the RTS apportionment from one LPA to one or more other LPAs within the same sub-region, so as to make corresponding increases in provision within those authorities, as required by MTAN 1. The receiving authorities

will need to increase their apportionments<sup>20</sup> (and, where necessary, allocations<sup>21</sup>), to ensure that *as a minimum*, the overall requirements for ongoing supply within that sub-region, as set out in the RTS, are met (both numerically and in terms of aggregate type<sup>22</sup>). It will not normally be appropriate to merely transfer apportionments to an LPA with sufficient existing reserves to arithmetically absorb the apportionment, without reference to the additional consideration of productive capacity<sup>23</sup>.

Where any adjustments are made, the details and justifications will need to be set out clearly in the SSRC and will be subject to Examination as part of the LDP or SDP process.

The LPAs involved should demonstrate, as far as possible, that the SSRC has been produced in consultation with relevant stakeholders, including the Regional Aggregate Working Party (RAWP), as part of the LDP process. The RAWP would not have any powers of approval over SSRCs but would simply provide a forum for discussion of proposed arrangements and, where necessary, could raise objections.

Where there is clear evidence that the sub-region as a whole cannot meet its collective apportionment, SSRCs may be extended to include one or more other LPAs in directly adjoining parts of a neighbouring sub-region. This may be appropriate, for example, for LPAs which become part of a single SDP sub-region, even though they are in different RTS sub-regions. However, the considerations, as outlined above, would still apply.

---

<sup>20</sup> This will not apply to National Park Authorities, where the apportionments stated within the RTS shall not be increased.

<sup>21</sup> Where an apportionment (or part thereof) is transferred from one LPA to another, the receiving authority will need to calculate its resulting total apportionment, over 25 years (for crushed rock) or 22 years (for sand & gravel) and compare those figures with existing landbanks. Where this results in a shortfall of permitted reserves, corresponding allocations for future working will need to be identified within that authority's area to make up the deficit.

<sup>22</sup> Where alternative sources of supply are to be considered, the alternative must either be of the same type or, at least, one that is fully capable of meeting the same end-use specifications. For this reason, and to avoid the inappropriate use of specialist aggregate types, it should be noted that High Specification Aggregates such as those with a high Polished Stone Value (PSV) are not interchangeable with other aggregate types.

<sup>23</sup> Whether or not adequate productive capacity is maintained within a given area will, in part, be the responsibility of industry. All that is expected of LPAs in such cases is that they facilitate such capacity through planning permissions and realistic allocations for future working in accordance with Planning Policy Wales and MTAN 1.

## Glossary

The following terms are frequently used in relation to aggregate supply and apportionment. The terms are listed in topic groupings rather than alphabetically.

Term	Definition, in relation to the supply of aggregates
<b>TOPIC: Aggregate Materials</b>	
<b>Aggregate</b>	Crushed rock, natural sand and gravel or artificial granular material that is used in construction, often in conjunction with a suitable binding agent such as bitumen or cement.
<b>Primary Aggregates</b>	Aggregates sourced directly from naturally occurring geological materials as a primary product (as distinct from secondary aggregates, including excavation wastes, produced as a by-product from the extraction or processing of geological materials for other primary purposes).
<b>Secondary Aggregates</b>	These are usually by-products of other industrial processes, or the arisings from non-aggregates extractive operations, that have been processed to meet the specification requirements for construction aggregate materials. They can be sub-divided into manufactured and natural materials, depending on their source. Examples of manufactured secondary aggregates are pulverised fuel ash (PFA) and metallurgical (iron and steel) slags. Natural secondary aggregates include china clay sand, ball clay sand, aggregate produced from slate waste or colliery spoil and excavation wastes (as defined below). All of these are exempt from the aggregates levy, giving them a deliberate cost advantage over primary materials, in an attempt to encourage their greater use.
<b>Construction, Demolition and Excavation Wastes (CD&amp;EW)</b>	A term referring to wastes (see below) arising from the construction or demolition of buildings and/or civil engineering infrastructure, or from excavations associated with land levelling, foundations or other civil engineering works. Aggregates may be derived from some of these various waste streams, either as recycled materials or from excavation wastes (both of which are defined separately below).
<b>Waste</b>	Any substance or object which the holder discards or intends, or is required, to discard. In CD&EW surveys, materials arising from construction or demolition works, or from associated excavations, which are beneficially used <i>in an unprocessed form</i> on the site on which they arise are generally not regarded as waste, because they are not generally regulated as waste.
<b>Road planings</b>	A particular example of CD&EW materials, comprising aggregate and bituminous or cement binder materials that have been 'planed' from the surface of a worn out road prior to resurfacing with new or recycled materials.
<b>Recycled Materials suitable for use as Aggregate</b>	These are materials, usually arising from construction or demolition projects, which have previously been used for construction purposes, and which are capable of being recycled or re-used as construction aggregates for a second or further time. In the Finance Act 2001, all materials previously used in construction are exempt from the aggregates levy, giving them a deliberate cost advantage over primary aggregates in an attempt to encourage their greater utilisation.
<b>Excavation Waste suitable for use as Aggregate</b>	These are materials that may be suitable, with or without processing, for use as secondary aggregates, arising from excavation works: <ul style="list-style-type: none"> <li><b>a)</b> on the site of any building or proposed building, where the excavation is undertaken exclusively for the purposes of laying foundations, pipes or cables;</li> <li><b>b)</b> on the site of any river, canal, watercourse or navigational channel, where the excavation is undertaken exclusively for the purpose of creating, restoring, improving or maintaining that feature;</li> <li><b>c)</b> along the line or proposed line of any highway or proposed highway, where the excavation is undertaken for the purpose of constructing, improving or maintaining the highway and not wholly or mainly for the purpose of extracting aggregate.</li> </ul> Each of these categories, as defined more precisely in the Finance Act 2001, is exempt from the aggregates levy, giving these materials a deliberate cost advantage over primary materials in an attempt to encourage their greater utilisation.
<b>Mineral Wastes</b>	Mineral wastes are identified in MTAN1 as a further category of material with potential for use as aggregate. The term is specifically used to encompass aggregates from slate waste, colliery spoil, and crushed rock fines (i.e. the "dust" generated from crushing and screening operations in hard rock primary aggregate quarries). It may also include aggregates produced from the excavation and processing wastes at building stone (dimensional stone) quarries. Aggregates produced from slate waste and colliery spoil are classed as secondary materials (see above) and are exempt from the aggregates levy. The same is not true of crushed rock fines, or of the residue from building stone production, both of which remain classed as primary aggregates and are not exempt.

<b>TOPIC: Supply and Demand</b>	
<b>Production</b>	The overall rate at which products are generated, in tonnes (or millions of tonnes) per year, <i>whether or not they are sold</i> . In quarrying, production includes any unsaleable materials that may be produced, including overburden, interburden and processing waste, which may or may not be useable.
<b>Sales</b>	The rate at which products are sold, in tonnes (or millions of tonnes) per year. In quarrying, for the reasons outlined above, this will usually be less than the rate of production.
<b>Consumption</b>	The rate at which products are used, within a specified market area, measured in tonnes (or millions of tonnes) per year.
<b>Demand</b>	The need or desire for a product, backed by an ability to pay. Demand is measured over a given time period, and is affected by budgets, prices, preferences and the availability and price of alternative products. Demand for aggregates may be expressed in terms of the rate at which it is expected to be used within a particular market area (which is rarely known), or the rate at which it is expected to be supplied from a given source area, and is measured in tonnes (or millions of tonnes) per year.
<b>Supply</b>	The amount of a product which is supplied. Supply of aggregates is normally expressed in relation to a particular source area and is measured in tonnes (or millions of tonnes) per year.
<b>Distribution</b>	The pattern of market destinations served by the sales from a particular quarry or group of quarries.
<b>Proximity Principle</b>	The general concept of minimising the transportation of aggregates (and other bulk materials) by road, in accordance with para. 26 of MTAN1, in order to reduce associated impacts on the environment.

<b>TOPIC: Resources, Reserves and Landbanks</b>	
<b>Resources</b> (of primary aggregate)	Geological materials, including rocks and naturally occurring sand & gravel, which have the potential to be used as aggregates. The presence of a resource does not imply an acceptance of mineral working.
<b>Permitted Reserves</b> (of primary aggregate)	Primary aggregate resources which have the benefit of planning permission for the winning and working of minerals.
<b>Landbank</b> (of primary aggregate reserves)	In general, a landbank is a stock of planning permissions for the winning and working of minerals within a specified area, expressed both in millions of tonnes and in terms of the number of years' supply which they represent. The latter is usually calculated on the basis of recent rates of production.
<b>Current Landbank</b> (of permitted primary aggregate reserves)	In MTAN1 (paragraph 45), this is defined as <i>"the sum of all permitted reserves at active and inactive sites at a given time and for a given area"</i> , and is required to be based on <i>"the latest 3 years production figures"</i> (production, in this case, usually being represented by sales). <b>For the purposes of the RTS, and in the interests of adopting a more practical approach to the strategic planning of aggregates provision in Wales, two deliberate departures from this definition were agreed by the Steering Group at the time of the First Review.</b> Firstly, although 'inactive sites' technically include those which are dormant or suspended, the current landbank has been taken to exclude those sites (but see also 'Dormant Reserves' below). Secondly, in recognition of the prolonged economic recession, the agreed method of calculating the landbank has been to use the average of the latest 10 (rather than 3) years' sales figures.
<b>Dormant Reserves</b>	The permitted reserves of primary aggregates at Dormant sites (see below). MTAN1 (paragraph 47) requires these to be <i>"clearly shown in the landbank calculations as a separate category"</i> . For the purposes of this review, such reserves and those at sites where permission has been suspended (see below) have therefore been excluded from the main landbank calculations used to determine future allocation requirements, though in some cases they might be able taken into account by local authorities to offset any requirement for new allocations, subject to more detailed local knowledge.
<b>Future Landbank</b> (of primary aggregate reserves)*	In MTAN1 (paragraph 45), the Future (or 'Extended') Landbank is defined as <i>"land specifically allocated for the working of aggregates"</i> (but see footnote below*)
<b>Apportionment</b>	The rate for which the mineral planning system requires provision to be made, in Development Plans, for the supply of aggregates from a given area or region. This may be expressed either in terms of millions of tonnes over a specified period, and/or as an averaged 'annualised apportionment' in millions of tonnes per year.
<b>Allocation</b>	The identification, within a Local Development Plan, of an area of land for future mineral working. In Wales, the size (in terms of tonnage) of allocations required in specific LDPs are defined in the Regional Technical Statements, but only for areas in which the cumulative apportionments over the period covered by the RTS are in excess of the available landbank of permitted reserves, at the time of the baseline date used in the assessment (in this case 31/12/16).
<b>Provision</b>	The total amount of aggregate required to be supplied from a particular local authority over a period of time, such as the duration of its Local Development Plan. The overall provision may comprise both a landbank of permitted reserves and allocations for future working.
* The term 'Future Landbank' is somewhat confusing, since a landbank is a stock of planning permissions and (by definition), allocations do not have this status. Allocations may thus form part of the overall 'provision' within a Local Development Plan, but cannot form part of the landbank.	

<b>TOPIC: Quarry Status</b>	
<b>Active Site</b>	Active sites in Wales are explicitly defined by the Town and Country Planning (Fees for Applications and Deemed Applications) (Amendment No.2) (Wales) Regulations 2006 as sites where “ <b>a</b> ) <i>development to which the relevant mineral permission or landfill permission relates is being carried out to any substantial extent; or b</i> ) other works to which a condition attached to such permission are being carried out to any substantial extent”. "Substantial extent" is not defined, but relevant guidance is provided in Minerals Planning Guidance Note 14 (MPG14): Environment Act 1995:- Review of Mineral Planning Permissions.
<b>Inactive Site</b>	Defined by the Town and Country Planning (Fees for Applications and Deemed Applications) (Amendment No.2) (Wales) Regulations 2006 as one “ <i>which is not an active site</i> ”, as defined above. Inactive sites thus include, but are not limited to, those which are classified under the Environment Act 1995 as being dormant and those where planning permission has been suspended (see below).
<b>Dormant Site</b>	As defined in the Environment Act 1995, this refers specifically to quarries with mineral permissions granted between 30 <sup>th</sup> June 1948 and 22 <sup>nd</sup> February 1982 (i.e. “Phase I” and “Phase II” sites, as defined in the Act) where no minerals development was carried out to any substantial extent in, on, or under the site at any time in the period beginning on 22 February 1982 and ending with 6 June 1995. These sites still have valid planning permissions but, since 1 <sup>st</sup> November 1995 it has not been lawful to recommence or carry on working a dormant site until full modern planning conditions have been approved by the Local Planning Authority (LPA), through the process of an initial ROMP review (see below).  In some areas there are additional, ‘dormant IDO’ sites, as defined within the Planning and Compensation Act, 1991. These are sites which were originally granted consent under ‘Interim Development Orders’ (IDOs), in the period between 22 July 1943 and 1 July 1948, and which were subsequently registered under the 1991 Act (thus retaining valid planning permission), but where no substantial work was carried out between 1 May 1989 and 30 <sup>th</sup> April 1991. For these sites, a scheme of operation and restoration conditions is required to be submitted to the relevant LPA together with an acceptable Environmental Assessment, before they can lawfully be reactivated.
<b>ROMP</b>	The acronym for ‘Review of Old Mineral Permissions’ carried out in accordance with the Environment Act 1995. Sites which obtained planning permission between 1948 and 1982, whether active, inactive or dormant, were required by this Act to be subject to an Initial Review in order that modern planning conditions can be agreed. In addition, all sites (including reactivated ISO permissions) are required to be subject to subsequent Periodic Reviews at intervals of not less than 15 years. ROMP applications cannot be refused, since valid planning permissions already exist.  However, court judgments, guidance and regulations have since clarified that both the ROMP process, and the approval of new conditions at IDO sites, amount to obtaining new development consents and are therefore subject to Environmental Impact Assessment.
<b>Stalled ROMP / Suspended Permission</b>	Where a ROMP review has begun but has not been completed (e.g. because an Environmental Statement has not been submitted), the ROMP process is said to have ‘stalled’. In accordance with the Town and Country Planning (Environmental Impact Assessment) (Undetermined Reviews of Old Mineral Permissions) (Wales) Regulations 2009, planning permission then becomes ‘suspended’ - i.e. it ceases to authorise any minerals development. As with dormant sites, suspended permissions cannot lawfully be operated until the process (including Environmental Impact Assessment) has been completed and modern conditions agreed.

## Abbreviations

The following abbreviations are commonly used throughout the RTS.

AAV	Aggregate Abrasion Value
AM survey	Aggregate Minerals survey
AONB	Area of Outstanding Natural Beauty
BAA	British Aggregates Association
BGS	British Geological Survey
BMAPA	British Marine Aggregate Producers Association
CD&EW	Construction, Demolition and Excavation Waste
CPRW	Council for the Protection of Rural Wales
EA	Environmental Assessment
EC	European Commission
EIA	Environmental Impact Assessment
EMAADS	<i>Establishing a Methodology for Assessing Aggregates Demand and Supply</i> (project title)
ES	Environmental Statement
EU	European Union
FBA	Furnace Bottom Ash
GDP	Gross Domestic Product
GIS	Geographic Information System
HMRC	Her Majesty's Revenue & Customs
HSA	High Specification Aggregate
IDO	Interim Development Order
IMADP	Interim Marine Aggregates Dredging Policy
IMAECA	<i>Implementing the Methodology for Assessing the Environmental Capacity for primary Aggregates</i> (project title)
ISO	International Organisation for Standardisation
LDP	Local Development Plan
LPA	Local Planning Authority
MASS	Managed Aggregate Supply System
MHCLG	Ministry of Housing, Communities and Local Government
MPA	Mineral Products Association
MPPW	Minerals Planning Policy Wales
mt	Million tonnes
mtpa	Million tonnes per annum
MTAN	Minerals Technical Advice Note
NPA	National Park Authority
NRW	Natural Resources Wales
OBR	Office of Budget Responsibility
PFA	Pulverised Fuel Ash
POS	Planning Officers Society
PPW	Planning Policy Wales
PSV	Polished Stone Value
RAWP	Regional Aggregate Working Party
ROMP	Review of Old Mineral Permissions
RTS	Regional Technical Statement
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SSSI	Site of Special Scientific Interest
WG	Welsh Government

## Acknowledgements

The RTS 2<sup>nd</sup> Review was undertaken by Cuesta Consulting Limited under contract to the Welsh Government. The work was guided and overseen by a Steering Group, appointed by Welsh Government, to represent the key stakeholder groups involved. Grateful thanks are extended by the author to all members of this Group for their diligence and patience in guiding each stage of the work and for scrutinising the draft and final reports. It should be noted that, whilst consensus was achieved between all members of the Steering Group on most issues, where agreement could not be reached, the views of the Welsh Government prevailed.

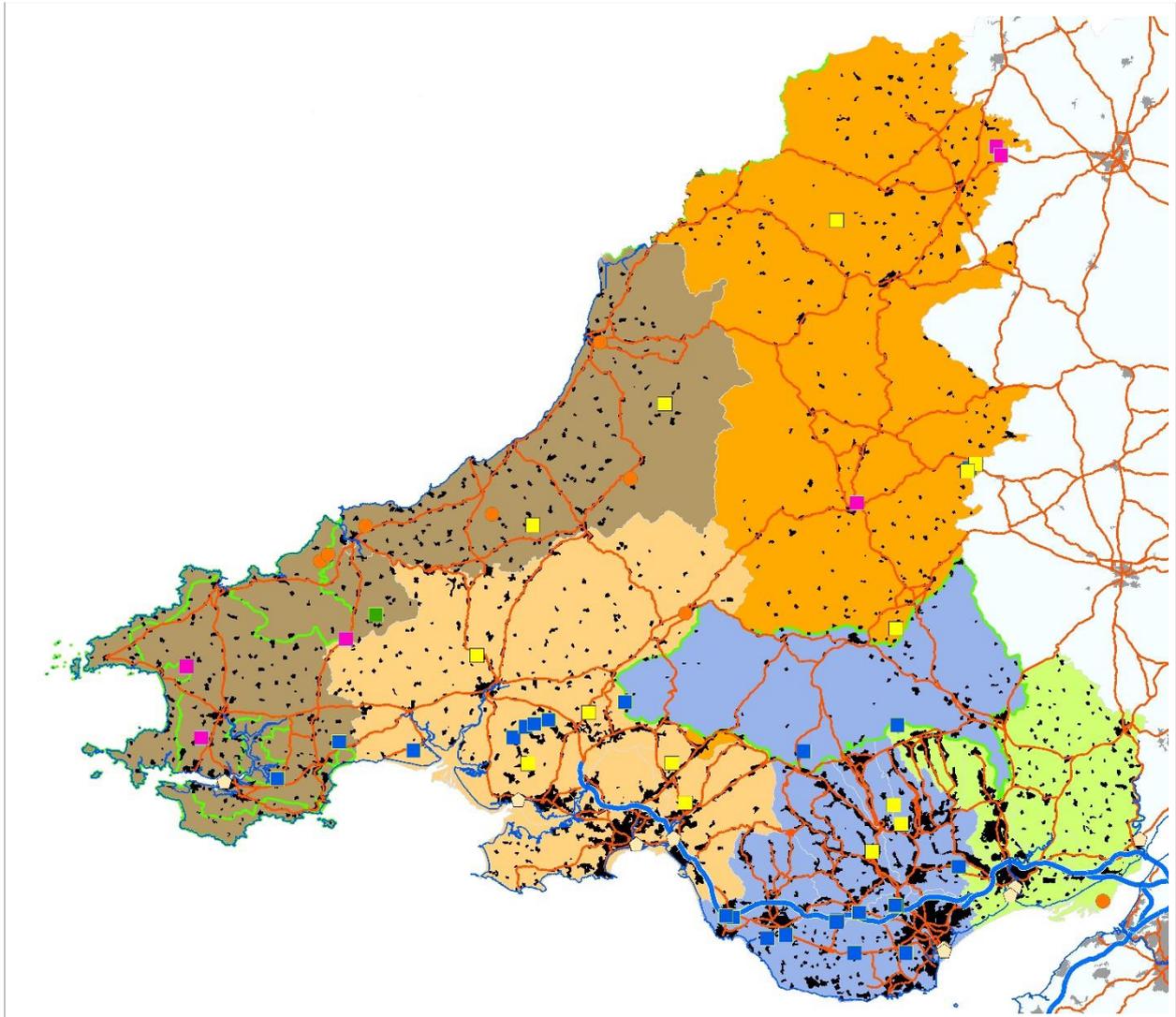
The Steering Group comprised:

- **Welsh Government:** Joanne Smith; Gareth Dudley-Jones
- **Secretary, North Wales Regional Aggregates Working Party:** Gary Nancarrow
- **Secretary, South Wales Regional Aggregates Working Party:** Hugh Towns
- **National Resources Wales:** Ian Gorton
- **Mineral Products Association:** Nick Horsley; Mark Frampton & Graham Jenkins
- **British Aggregates Association:** Trefor Evans\*
- **Gwynedd Council:** Dafydd Gareth Jones
- **Brecon Beacons National Park Authority:** Donna Bowhay

\* It is noted with deep sadness that Trefor passed away in April 2020

# Regional Technical Statement (2<sup>nd</sup> Review)

## Appendix B (South Wales)



*Final – September 2020*



Llywodraeth Cymru  
Welsh Government

South Wales  
Regional  
Aggregates  
Working Party

## CONTENTS

---

<b>Introduction.....</b>	<b>1</b>
<b>Existing Supply Patterns in South Wales – Regional Overview.....</b>	<b>1</b>
<b>Sub-Regional Analysis .....</b>	<b>7</b>
<b>Summary of Current Sources of Supply in South Wales.....</b>	<b>25</b>
<b>Apportionments, Allocations and Guidance to LPAs in South Wales.....</b>	<b>28</b>
BLAENAU GWENT .....	32
BRIDGEND .....	34
CAERPHILLY .....	36
CARDIFF.....	38
CARMARTHENSHIRE.....	40
CEREDIGION .....	42
MERTHYR TYDFIL /BRECON BEACONS NATIONAL PARK.....	44
MONMOUTHSHIRE .....	46
NEATH PORT TALBOT.....	48
NEWPORT.....	50
PEMBROKESHIRE.....	52
PEMBROKESHIRE COAST NATIONAL PARK .....	54
POWYS .....	56
RHONDDA CYNON TAF.....	58
SWANSEA .....	60
TORFAEN .....	62
VALE OF GLAMORGAN .....	64

Prepared, on behalf of the Welsh Government and the South Wales Regional Aggregate Working Party

by: **Cuesta Consulting Limited.**

(01460) 929 905 / mobile 07952 170 180  
[alan.thompson@cuesta-consulting.com](mailto:alan.thompson@cuesta-consulting.com)



## Appendix B: South Wales Region - Detailed Analysis & Recommendations

### *Introduction*

- B1. This appendix is intended to complement, and should be read in conjunction with, the main document of the Second Review of the RTS. It provides additional explanation, specific to the South Wales Regional Aggregate Working Party (RAWP) Region, relating to the consideration of existing supply patterns, the detailed breakdown of sub-regional apportionments and requirements for new allocations. The final part of the Appendix, from paragraph B78 onwards, incorporates that information into specific recommendations and guidance for each individual Local Planning Authority (LPA).

### *Existing Supply Patterns in South Wales – Regional Overview*

- B2. As explained in Chapter 3 of the main document, historical sales figures have been used in this review as a starting point for calculating the overall National requirement for land-won primary aggregate production in Wales, over the period covered by the revised RTS (i.e. 2020-2045). After applying a 30% uplift to reflect the planned increase in housing construction, this enhanced total has then been apportioned between North Wales and South Wales on the basis of their recent historical share of sales. The sub-regional apportionment of those regional figures has then been determined by looking carefully at the patterns of supply within each of seven sub-regions, created specifically for this purpose. That examination is briefly outlined in the main report and described more fully here.
- B3. Figure B1 shows the five sub-regions within the South Wales RAWP area. The sub-regions were created, at Welsh Government's suggestion, for the specific purpose of facilitating strategic minerals planning and collaborative approaches between LPAs. They each represent distinctive 'market areas' between which there is relatively little movement of aggregates, except for exports to England, and within which detailed, strategic consideration can be given as to the most appropriate patterns of supply. Looking carefully at the balance of supply between the LPAs within each sub-region is an important aspect of this.
- B4. For some LPAs, where the existing supply pattern already seems to provide a sensible balance between the spatial distributions of demand, resource availability and other factors, the new apportionments simply reflect the pattern of historical sales (i.e. the regional figures have been divided between the LPAs in proportion to their share of historical sales). In other areas, the new apportionments have been adjusted – primarily to take account of the distribution of planned housing activity, as indicated by the housing requirement figures in adopted LDPs - so that they reflect an improved (more equitable, more sustainable) spatial balance between supply and demand. In all cases, consideration has also been given, at least qualitatively, to factors such as environmental capacity, proximity and transport networks. The later sections of this document provide more detailed observations regarding these various factors within each of the sub-regions in South Wales.
- B5. It should be noted that the historical sales figures and apportionments relate only to land-won primary aggregates. These materials are needed to satisfy the residual levels of demand, once allowance has been made for the 'top-sliced' proportion of supply which is obtained from secondary and recycled sources and from marine-dredged aggregates. These materials contributed to the overall market throughout the baseline period and will continue to do so, leaving only the residual demand to be supplied from primary land-won sources.

**Figure B1: Sub-Regional Areas and their constituent Local Planning Authorities in South Wales**

- B6. No reliable monitoring data on recycled and secondary aggregate production is currently available for any part of the UK. The recently updated Mineral Planning Factsheet on aggregates produced by the British Geological Survey (BGS, 2019)<sup>1</sup> estimates that these materials now constitute approximately 30% of overall supply (based on data provided by the Mineral Products Association), and that most of the material that is suitable for aggregates use (primarily construction, demolition and excavation waste – CD&EW) is already being recovered and utilised. This has been the case since around 2005<sup>2</sup> and the proportion is thought unlikely to change in the foreseeable future. Being closely dependent upon the rate of construction activity, the actual tonnages can therefore be expected to rise and fall in line with variations in the overall rates of economic growth and will have a neutral impact on the demand for primary aggregates, compared to that seen during the baseline period (2007 to 2016). Moreover, in the case of recycled aggregates, since the arisings of CD&EW are (by definition) very closely associated with the occurrence of new construction work, their availability is unlikely to have any significant influence on spatial patterns of demand.

<sup>1</sup> <https://www.bgs.ac.uk/downloads/start.cfm?id=1355>

<sup>2</sup> [https://mineralproducts.org/documents/Contribution\\_of\\_Recycled\\_and\\_Secondary\\_Materials\\_to\\_Total\\_Aggs\\_Supply\\_in\\_GB.pdf](https://mineralproducts.org/documents/Contribution_of_Recycled_and_Secondary_Materials_to_Total_Aggs_Supply_in_GB.pdf)

- B7. That might not be the case for secondary aggregates, which have a more varied spatial distribution, with different types and different quantities being available within each LPA. Again, there are no up-to-date data sources to provide further details, but there are indications that some of these sources may be declining in availability, which would potentially increase the demand on primary aggregates within those areas. Further observations on this are noted, where appropriate, in the later sections on individual sub-regional areas.

#### Land-won Primary Aggregate Production

- B8. The historical sales figures for all land-won primary aggregates within each LPA in South Wales (including both crushed rock and natural sand & gravel) are shown in Table B1, below. The proportion supplied from crushed rock sources (averaged over 10 years) is shown in the right-hand column. The LPAs are grouped according to the sub-regions shown in Figure B1. The origin of the data is explained fully in Chapter 3 of the main text.

**Table B1: 10-year and 3-year Total Land-Won Primary Aggregates Sales Averages (to 2016) for each LPA in South Wales.**

Local Planning Authority	10-yr Average Aggregate Sales (total) (mtpa)	3-yr Average Aggregate Sales (total) (mtpa)	Highest of 3-yr and 10-yr ave. sales in each LPA (mtpa)	Proportion from crushed rock sources
Ceredigion	0.300	0.240	0.300	63.33%
Pembrokeshire	0.510	0.360	0.510	100%
Pembrokeshire Coast NP	0.330	0.270	0.330	63.64%
Carmarthenshire	0.832	0.821	0.832	76%
Swansea	0.000	0.000	0.000	100%
Neath Port Talbot	0.460	0.300	0.460	100%
Powys	2.470	2.650	2.650	100%
Brecon Beacons National Park	0.490	0.540	0.540	100%
Merthyr Tydfil	0.150	0.010	0.150	100%
Bridgend	0.580	0.600	0.600	100%
Rhonda Cynon Taf	0.610	0.670	0.670	100%
Vale of Glamorgan	0.660	0.580	0.660	100%
Caerphilly	0.390	0.100	0.390	100%
Cardiff	0.830	1.060	1.060	100%
Blaenau Gwent	0.170	0.180	0.180	100%
Monmouthshire	0.070	0.060	0.070	100%
Newport	0.000	0.000	0.000	100%
Torfaen	0.000	0.000	0.000	100%
<b>TOTAL, South Wales</b>			<b>9.402</b>	<b>97.04%</b>

SOURCE: Collated by the South Wales RAWP secretary from confidential industry data.

- B9. The figures for land-based sand & gravel production in South Wales (i.e. zero in most cases) are greatly distorted by the reliance of South East Wales, in particular, on marine-dredged aggregates from the Bristol Channel and the Severn Estuary. West Wales is less dependent on marine aggregates and has a small number of active land-based sites, primarily within the Pembrokeshire Coast National Park and Ceredigion. Carmarthenshire also has one very small operation. Powys is too far removed from the coast to be influenced to any significant degree by marine aggregates, but still has only one small land-based sand & gravel site where planning permission has been suspended. The county is reliant instead on crushed rock material. Whilst there are potential resources of natural sand & gravel within the upper reaches of the Severn,

Wye and Usk valleys, those are primarily within the Brecon Beacons National Park, part of the Cardiff City sub-regional area.

- B10. The figures for crushed rock production within South Wales are dominated by the output from Powys, where a number of sandstone and igneous rock quarries supply HSA material to England - particularly to adjoining parts of the West Midlands. In the rest of South Wales, the picture is affected by the much smaller size of most of the individual planning authorities, Historical crushed rock sales in South Wales have been concentrated within Cardiff, Carmarthenshire, Bridgend, Vale of Glamorgan, Rhondda Cynon Taf and the Brecon Beacons National Park (which is where most of the larger Carboniferous Limestone quarries in South Wales are located), in the adjoining LPAs of Caerphilly and Neath Port Talbot, where additional HSA sandstone quarries are located, and in Pembrokeshire, where there is a mixture of limestone, igneous and slate quarries.
- B11. Significantly, there has been no crushed rock production, during the baseline period, within Swansea, Torfaen or Newport, and very little in Monmouthshire. In the case of Torfaen and Newport this is a reflection of the very limited outcrop of suitable resources, although Carboniferous Limestone was formerly extracted from Penhow Quarry in Newport. In the case of Swansea, the limestone resources are plentiful but are either within the Gower AONB or constrained by existing urban development. Swansea does, however, have relatively unconstrained resources of HSA sandstone. In Monmouthshire, permitted reserves of Carboniferous limestone remain at Ifton Quarry, though this is currently inactive and has been since at least the time of the First Review. Further observations on the relationships between production, resources, markets and environmental capacity within each of the sub-regions are given in paragraphs B30 *et seq.*, below.

#### Marine-dredged Aggregates

- B12. As noted above, in South Wales, the availability of marine-dredged sand & gravel is of major importance, with supplies being sourced from both Welsh and English waters within the Severn Estuary and the Bristol Channel. Over the 2007 to 2016 baseline period, marine aggregate landings within South Wales accounted for an average of almost 83% of total sand & gravel production, and 9.1% of total primary aggregate production. In south-east Wales (i.e. the Cardiff City and Former Gwent sub-regions), marine-dredged material is the only source of sand & gravel currently available, though it is understood that some commercial exploration work has recently been undertaken of potential resource blocks identified in an earlier study for Welsh Government by Thompson *et al* (2002).
- B13. Discussions with BMAPA in 2019 suggest that similar levels of marine aggregates production are likely to continue in future years, in line with the current Interim Marine Aggregates Dredging Policy (IMADP).
- B14. For the time being, it seems reasonable to suppose that marine-dredged aggregates will continue to supply a similar proportion of overall demand as they have done over the last decade, so the demand for land-won aggregates in any of the LPAs in South Wales is not likely to be affected.

#### Secondary Aggregate Production

- B15. Secondary aggregates comprise the by-products of various industrial processes, including metallurgical slags and power station arisings, but also the by-products from certain types of non-aggregate mineral extraction, such as colliery spoil and slate waste, and from the recycling of glass, ceramics, asphalt planings and rail ballast<sup>3</sup>.
- B16. Aggregate production from metallurgical slags has traditionally been an important source of secondary aggregate within South Wales. Port Talbot continues to produce both blast furnace (iron) and steel slag, whilst electric arc furnace steel slag is still produced from one site in Cardiff. The processing of older stockpiles of blast furnace slag at the former Llanwern steel works is now understood to have ceased. Secondary aggregates are produced from all of these materials

<sup>3</sup> it might appear more logical to group these substances with other recycled materials from construction, demolition and excavation wastes (CD&EW). However, the coverage of CD&EW is already well defined in terms of survey returns, so those items are included here as secondary aggregates.

although volumes are thought to be declining, placing increased pressure on primary aggregate sources.

- B17. Coal-fired power station arisings, comprising pulverised fuel ash (PFA) and furnace bottom ash (FBA) are currently produced only at the Aberthaw Power Station. With the planned closure of all coal-fired power stations by 2025, this production will cease. Whether or not historic PFA stockpiles will be able to be worked in future remains to be seen.
- B18. Small amounts of aggregate minerals (sandstone and occasionally sand) arise adventitiously from the reworking of former colliery spoil tips or from the working of opencast coal. In South Wales, significant quantities of colliery spoil still exist in tips that have not been removed or landscaped under the Derelict Land Reclamation Scheme (and successors). The overall potential for producing aggregate from this material is small, however, for a combination of local (social and planning), fiscal and regulatory reasons, but could be locally significant, where the quality of the material is suitable for the end-uses required. Planning permission for the reworking of former tips exists at Tower Colliery (RCT) but is not being actively exploited at present. Reworking of the spoil from the former opencast workings at Tir Pentwys (straddling the border between Torfaen and Blaenau Gwent) has also been considered and is the subject of Preferred Area allocations in both authorities. A planning application for reworking the Torfaen part of the Tir Pentwys site was the subject of a recent Public Inquiry, but the Appeal was dismissed in August 2019, on the basis of impacts of the proposed access route on an area of Ancient Woodland. Unless and until an acceptable alternative means of access is provided, this renders the resources within that Preferred Area unworkable, and also precludes access to those on the Blaenau Gwent side.
- B19. Sandstone arisings from new opencast workings have been important as 'windfall' resources at a number of sites within the South Wales coalfield, but these are classed as primary aggregates and are therefore not considered further here.
- B20. Slate waste is produced in very small quantities in South Wales, from the northern part of the Pembrokeshire Coast National Park and in southernmost Ceredigion. However, the extent to which this resource has been utilised as aggregate is understood to be minimal, and the prospects for future utilisation are equally limited. Mention was made in the original RTS of the possibility of importing secondary aggregates from the much greater quantities of higher quality slate waste in North Wales, though this was also seen as a 'remote' prospect and no progress has since been made.
- B21. The various sources of secondary aggregate noted above, together with recycled aggregates, as discussed below, are currently exempt from the Aggregates Levy, in a deliberate attempt to minimise the use of primary aggregates. During 2019 and 2020, the Aggregates Levy was comprehensively reviewed by HMRC, but no changes have been made to those exemptions.

### Recycled Aggregates

- B22. Aggregates produced from construction, demolition and excavation wastes (CD&EW) form an important contribution to the overall consumption of construction aggregates. The 2008 RTSs noted a total output for the whole of Wales of 3.97mt, based on 2005 survey data, and suggested a roughly 3 to 1 split between South Wales and North Wales, based on earlier surveys and population ratios. They also noted that, despite the lack of quantitative detail, it is inevitable that the greatest volumes of CD&EW arisings and usage are in the urban areas. The RTS documents emphasised, however, that all statistics for this sector need to be used with a high degree of caution, because of the low rate of response to the surveys.
- B23. The situation, in terms of available data, has not improved since the original RTSs were published. No new survey data is available, other than a C&D Waste survey in 2012, so any observations on recent or future trends can only be regarded as broad approximations. If anything, the efficiency of recycling is likely to have increased, and the introduction of WRAP's (2005) 'Quality Protocol' for the production of aggregates from inert waste may have increased the proportion and usage of higher value products derived from the various recycled sources. Such improvements, however, represent only small increments on the progress which had previously been made - primarily as a consequence of the price advantages resulting from the landfill tax and, to a lesser extent, the aggregates levy. The view of the Mineral Products Association (MPA), which is not disputed by the NRW, remains that there is limited opportunity

for significant further increase in the proportion of construction aggregate likely to be derived from this sector. As noted earlier, the future availability of recycled aggregates seems likely to be inextricably linked to the overall rates of construction activity and economic growth, so the safest assumption is that it will rise and fall in a very similar way to overall demand, and will thus have a neutral impact on the demand for primary aggregates, compared to the baseline period (2007 to 2016).

### Imports and Exports

- B24. Wales has always been a net exporter of land-won aggregates. Data on both exports and imports is recorded in the periodic Aggregate Minerals (AM) Surveys, and data for exports in the last four surveys is summarised in Table B2, below.

**Table B2: Summary of key export statistics for South Wales from recent AM surveys**

<i>Note: all figures exclude sales for non-aggregate use</i>	<b>AM2001</b> (mt)	<b>AM2005</b> (mt)	<b>AM2009</b> (mt)	<b>AM2014</b> (mt)
(data from Table 4j of the AM reports)				
Land won Sand & Gravel Sales	0.115	0.304	0.144	0.205
S&G Exports*	0.001	0.011	0	0
<b>South Wales S&amp;G Exports as % of S&amp;G total</b>	<b>1%</b>	<b>4%</b>	<b>0%</b>	<b>0%</b>
Limestone Sales	6.536	6.137	4.554	4.540
Limestone Exports*	0.262	0.154	0.052	0.332
<b>Exports as % of Limestone total</b>	<b>4%</b>	<b>3%</b>	<b>1%</b>	<b>7%</b>
Igneous Sales	0.838	1.238	1.025	1.577
Igneous Exports*	0.572	0.430	0.694	0.829
<b>Exports as % of Igneous total</b>	<b>68%</b>	<b>35%</b>	<b>68%</b>	<b>53%</b>
Sandstone Sales	2.648	3.498	2.605	1.709
Sandstone Exports*	1.457	1.941	1.258	0.852
<b>Exports as % of Sandstone total</b>	<b>55%</b>	<b>55%</b>	<b>48%</b>	<b>50%</b>
Total Crushed Rock Sales**	10.310	10.873	8.185	7.825
Total CR Exports*	2.302	2.527	2.003	2.013
<b>South Wales CR Exports as % of CR total</b>	<b>22%</b>	<b>23%</b>	<b>24%</b>	<b>26%</b>

\* 'exports' are primarily to England but include some movement between South Wales and North Wales.

\*\* Unlike the figures used elsewhere in this Review, crushed rock sales in the AM reports exclude slate

- B25. In South Wales, the main export in terms of overall tonnage is of sandstone, the vast majority of which is High Specification Aggregate (HSA) - skid-resistant road surfacing material with a Polished Stone Value (PSV) of 58 or above, and generally much higher (Thompson, Greig & Shaw 1993; Thompson *et al.*, 2004).
- B26. In 2002, the total output of HSA sandstone from South Wales was 1.280mt<sup>4</sup>. This amounts to some 88% of the previous year's (AM 2001) figure of 1.457 for all sandstone exports from South Wales (the difference representing the change from 2001 to 2002 and the inclusion of some non-HSA sandstone in the latter figure). Of the total HSA sandstone output from South Wales in 2002, some 69% is known to have been exported to England, with the remaining 31% being utilised in Wales, (including domestic consumption within South Wales and exports to North Wales). Of the total HSA sandstone exported, most was supplied from five quarries and two opencast sites in the Pennant Measures of the South Wales coalfield (from which 58% of HSA output was exported to England in 2002); whilst the remainder was sourced from three HSA sandstone quarries in Powys (from which a much higher proportion - 88% - was exported to England).

<sup>4</sup> Source for this and subsequent data on High Specification Aggregates: unpublished information collated by the author as part of the Capita Symonds' analysis of High Specification Aggregates production in 2002 (Thompson *et al.*, 2004).

- B27. Reference to Table B2 shows that, although there was a reduction in sandstone exports between 2005 and 2009, the difference is much less marked than was the case for Wales' other main aggregate export – limestone from North Wales (see Appendix A), especially in percentage terms. This reflected the fact that the market for skid-resistant road aggregate held up better, during the recession of 2007 and 2008, than had been the case for more general-purpose limestone aggregate (presumably because of the safety imperative of continuing to maintain skid resistance on major roads). However, whilst the North Wales limestone exports had largely recovered by the time of the AM 2014 survey, HSA sandstone exports from South Wales continued to decline, as did the overall sales of these materials. The explanation for this decline is not clear. It may at least partly have been due to a marked reduction in production capacity from some of the major HSA quarries in South Wales over this period: Cribarth Quarry closed in 2014, following a number of years of declining output as permitted reserves were used up; Gelligaer Quarry was inactive between 2012 and 2015; and Hafod Fach Quarry has been inactive since 2015. There does also seem to have been a fall in demand, however, as seen in the steadily declining outputs from Cwm Nant Lleici Quarry, from 2007 to 2014 (Thompson, 2015). If similar trends occurred at other active HSA units, it may reflect the relatively low priority given to road construction and maintenance, since the recession, by comparison with the more focused spending on house building.
- B28. Imports of land-based aggregates are very minor, by comparison with exports. In South Wales in 2014 (from Table 5j of the AM 2014 survey report), land-based imports amounted to 0.042mt of sand & gravel and 0.079mt of crushed rock, primarily limestone from South West England. These compare with imports of 0.064mt of sand & gravel and 0.172mt of crushed rock in the previous (AM 2009) survey.
- B29. Imports and exports of marine-dredged sand and gravel between England and Wales are only relevant to the RTS apportionment exercise if they affect the continuity of supply of these materials to Wales and thus give rise to increased demand on land-based resources. This is potentially an issue in South East Wales which, as noted earlier, is heavily dependent upon marine aggregates. At the time of the First Review, Wales was a net importer of marine sand & gravel, dredged from the English side of the median line in the Bristol Channel and the Severn Estuary. This was noted in the Review as being likely to change, subject to the approval of new licence applications within Welsh waters. By 2019, the relative balance between imports and exports has shifted as a consequence of a new licence that has been recently permitted across the median line between English and Welsh waters. However, significant trade continues from English licences to Welsh markets as well as vice versa. In Liverpool Bay, the only licence area in Welsh waters remains a net exporter to north west English markets.

### ***Sub-Regional Analysis***

- B30. In the First Review, the sub-regional analysis for South Wales was based on three broad areas: Mid Wales, South West Wales and South East Wales. In this review, as explained earlier and as illustrated in Figure B1, above, it is based on five smaller areas, each one being intended to approximate a relatively 'self-contained' market area for aggregate production and sales, with little movement of aggregate taking place between adjoining areas, other than exports to England.
- B31. Maps corresponding to each of these areas are presented in Figures B2 to B11 below. For each sub-region there are three maps. The first one shows the distribution of aggregate resources and existing quarries. The second map, at a smaller scale, deals with 'proximity' issues (i.e. the relationships between resources, quarry locations, major roads and the distribution of both planned housing requirements in each LPA and existing urban areas). Planned housing requirements are used in preference to the population density maps that were used in the First Review, although both distributions are shown, for comparison, in Figures 4.7 and 4.8 of the main document. The third map for each sub-region then deals with environmental capacity issues, utilising output from the earlier IMAECA analysis (Enviros, 2005). All of the larger maps are presented at the same approximate scale, as are all of the smaller maps (as indicated in each case by the 30km scale bar).
- B32. It must be emphasised that these maps show only resources and not permitted reserves. **Resources** are geological materials, including rocks and naturally occurring sand & gravel, which have the potential to be used for a particular purpose (in this case as construction

aggregates). **Permitted Reserves** are those parts of a resource which are known to be suitable for this purpose (usually as a result of detailed ground investigations and laboratory testing) and which have valid planning permission for the winning and working of the materials in question. The outlines of permitted reserves are not shown on the maps.

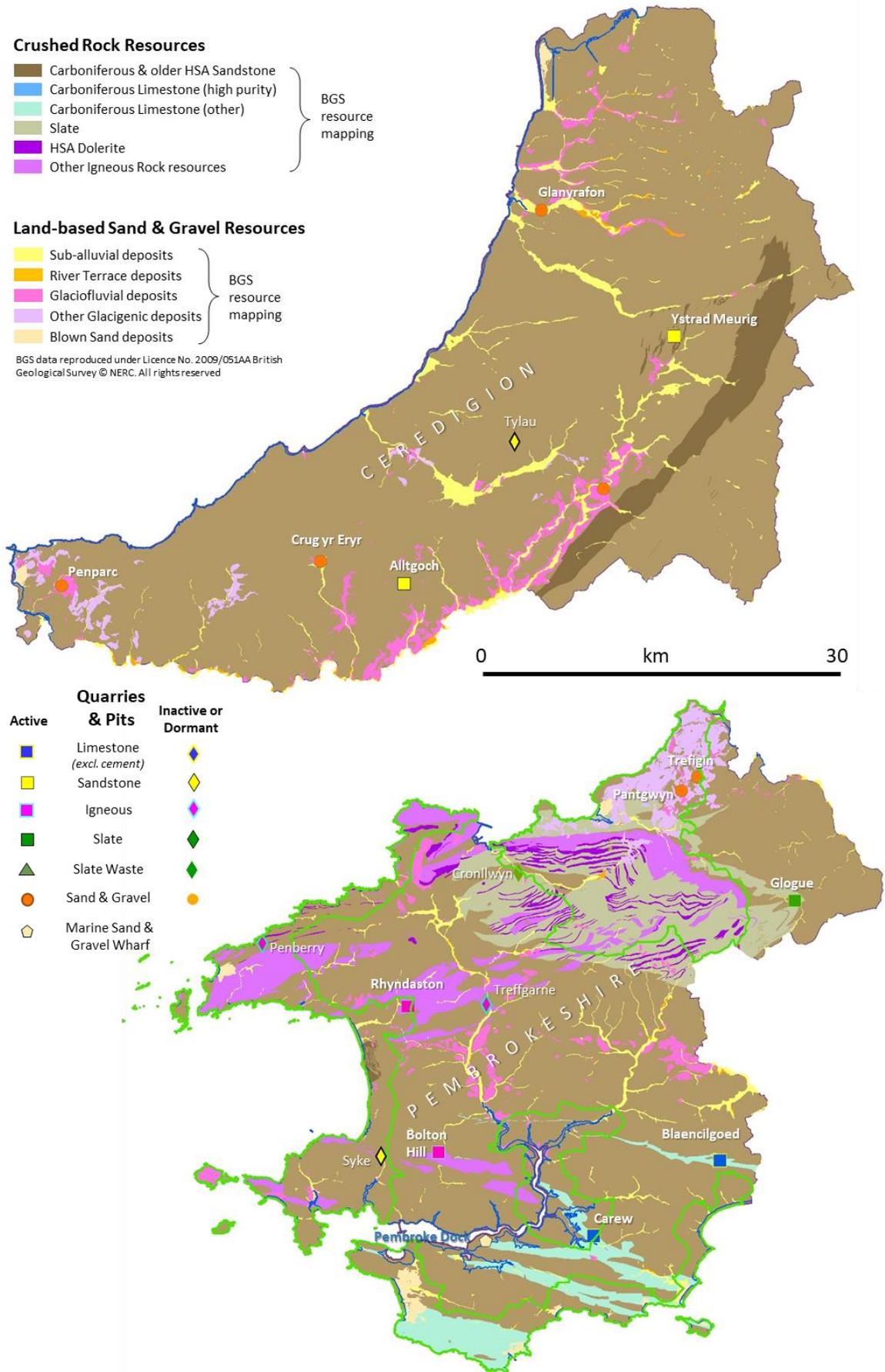
- B33. The resources are illustrated in several main categories. Natural **sand & gravel resources**, as mapped by the British Geological Survey (BGS) may be associated with five different types of 'superficial' deposits, as shown on the key to each map, though the extent of workable mineral within these deposits is highly variable. Some of the maps show an additional category of sand & gravel resource blocks that were identified in more detailed study for the Welsh Assembly by the former Symonds Group. These were identified primarily in terms of reconnaissance-level mapping of Quaternary geology and geomorphology, supported by very limited borehole investigations (Thompson *et al*, 2000), and were examined further in a comparative environmental assessment of both marine and land-based resources (Thompson *et al*, 2002). The resource blocks are shown by the deep red shading on the maps for the Swansea, Cardiff and Former Gwent areas.
- B34. **Crushed rock resources** within the area comprise Carboniferous (and older) HSA sandstones (i.e. those which are generally suitable for use as High Specification Aggregates – HSA – for use in skid-resistant road surfacing); Carboniferous Limestones (which are subdivided, on the larger maps, into high purity (>97% CaCO<sub>3</sub>) and other limestones); Igneous Rocks (including HSA dolerites, which are differentiated on the larger maps); and Slates.
- B35. The quarries shown on the maps are categorised in the same way as the resources. They include both active and inactive units (as of 2018), the latter including a small number of dormant sites and one suspended permission. Separate listings of all active, inactive and dormant (or suspended) sites in South Wales are given in Tables B3, B4 and B5, respectively.

#### West Wales Sub-Region

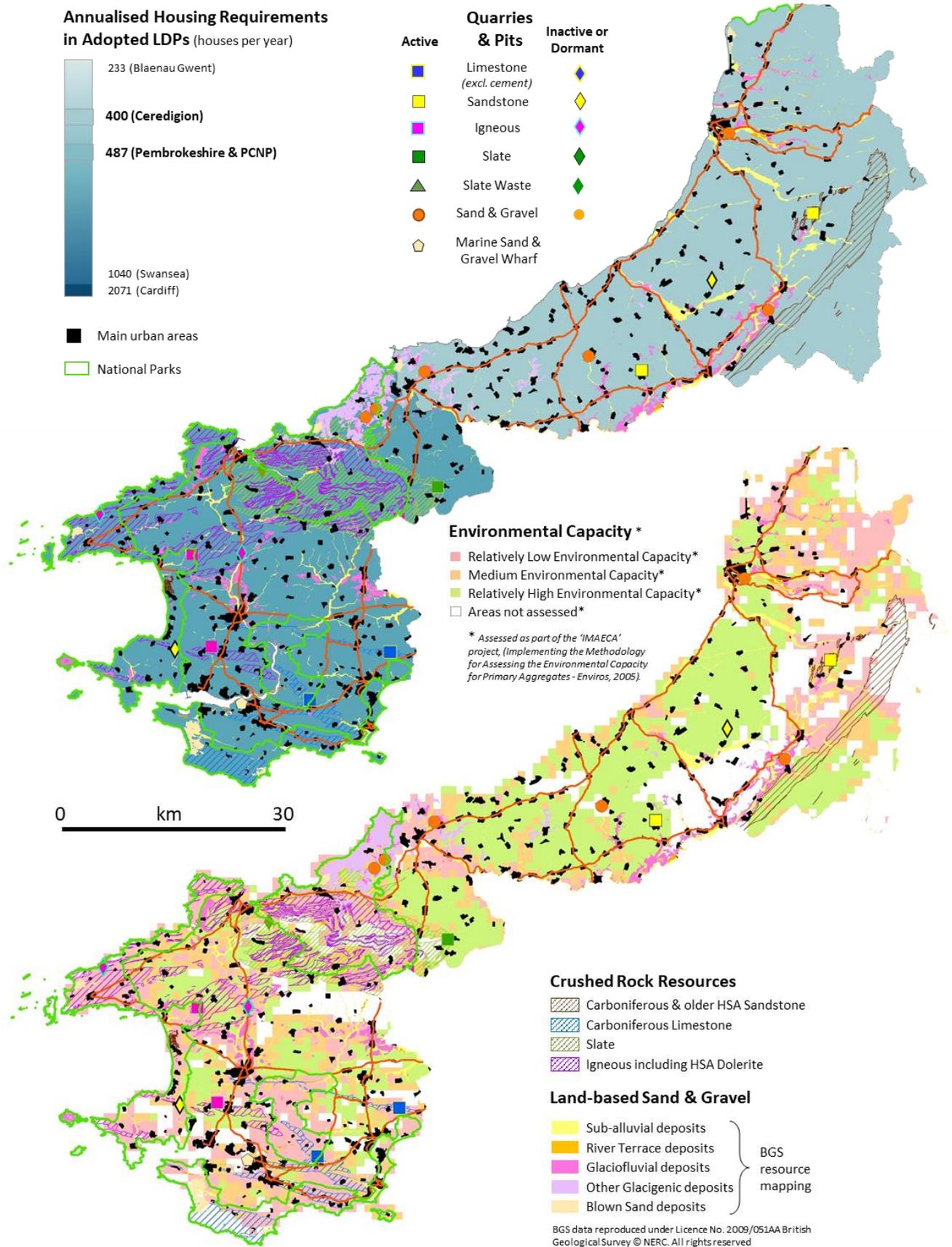
- B36. Figure B2, below illustrates the distribution of quarries and land-based aggregate resources within West Wales. For ease of presentation, Ceredigion is shown separately to Pembrokeshire and the Pembrokeshire Coast National Park. The crushed rock resources comprise:
- **Silurian and Ordovician HSA sandstones**, currently worked at Ystrad Meurig and Alltgoch quarries in Ceredigion, respectively;
  - a wide variety of **igneous rocks**, including quartz diorite worked at Bolton Hill in Pembrokeshire and volcanic rhyolite, worked at Rhyndaston Quarry, just inside the National Park;
  - **Ordovician slates**, currently worked only at Glogue Quarry in Pembrokeshire; and
  - **Carboniferous Limestone**, worked at Blaencilgoed (a.k.a. Gellihalog Quarry) in Pembrokeshire and at Carew, just inside the National Park.
- B37. In addition, there are extensive **glacial** and **glaciofluvial sand & gravel** deposits around Cardigan, straddling the boundaries between the National Park (Trefigin and Pantgwyn Quarries), Pembrokeshire and Ceredigion (Penyparc Quarry). Glaciofluvial deposits are also present along the Teifi valley in Ceredigion (currently worked at Pant Quarry), and in more localised areas elsewhere (including Crug-yr-Eryr Quarry, in Ceredigion). **Alluvial sand & gravel** is also worked, on a very small scale, in the Rheidol valley at Glanyrafon in Aberystwyth.
- B38. Figure B3 illustrates the relationships of these quarries and resources to issues relating to the likely pattern of demand (as indicated by proximity to existing urban areas, planned housing requirements and the primary road network); and issues relating to environmental capacity.
- B39. Most if not all of the quarries are thought likely to serve markets which lie primarily within the West Wales sub-region. This is not least because of the distance of most of them from other markets further north and east, the limited road connections across the Cambrian Mountains in mid-Wales and the existence of other quarries closer to those other market areas. Within the sub-region, some of the quarries are well-placed in relation to local centres of demand, for example around Pembroke, Haverfordwest and Cardigan, whilst others are located in more distant, rural locations, as dictated by the available resource outcrops.

- B40. Overall, there is limited justification for changing the existing pattern of supply, from a proximity point of view. There is more justification in seeking changes from an environmental perspective – particularly in order to encourage a shift of production, in future, away from the National Park. This would require increased output (and/or new sources to be established) in other areas – particularly in Ceredigion which, as noted in the main report, does not currently supply aggregates in proportion to its share of sub-regional housing requirements.
- B41. In the case of sand & gravel production, potential opportunities (in terms of resources) exist within Ceredigion, both close to Cardigan (though these are generally in areas of relatively low environmental capacity) and further upstream along the Teifi valley (where environmental capacity has not been assessed). Additional resources also occur on the opposite side of this valley in neighbouring Carmarthenshire, and it would be sensible for these to be included in the search for opportunities. In this regard, the First Review of the RTS suggested that there would be merit in developing a combined approach to future apportionments and allocations between Pembrokeshire, Ceredigion and Carmarthenshire. Although Carmarthenshire is in a separate sub-region (primarily because of the market for crushed rock in the Swansea area), it is recommended that these joint working arrangements should continue, with regard to sand & gravel.

**Figure B2: Aggregate Resources and Quarries in the West Wales Sub-Region**



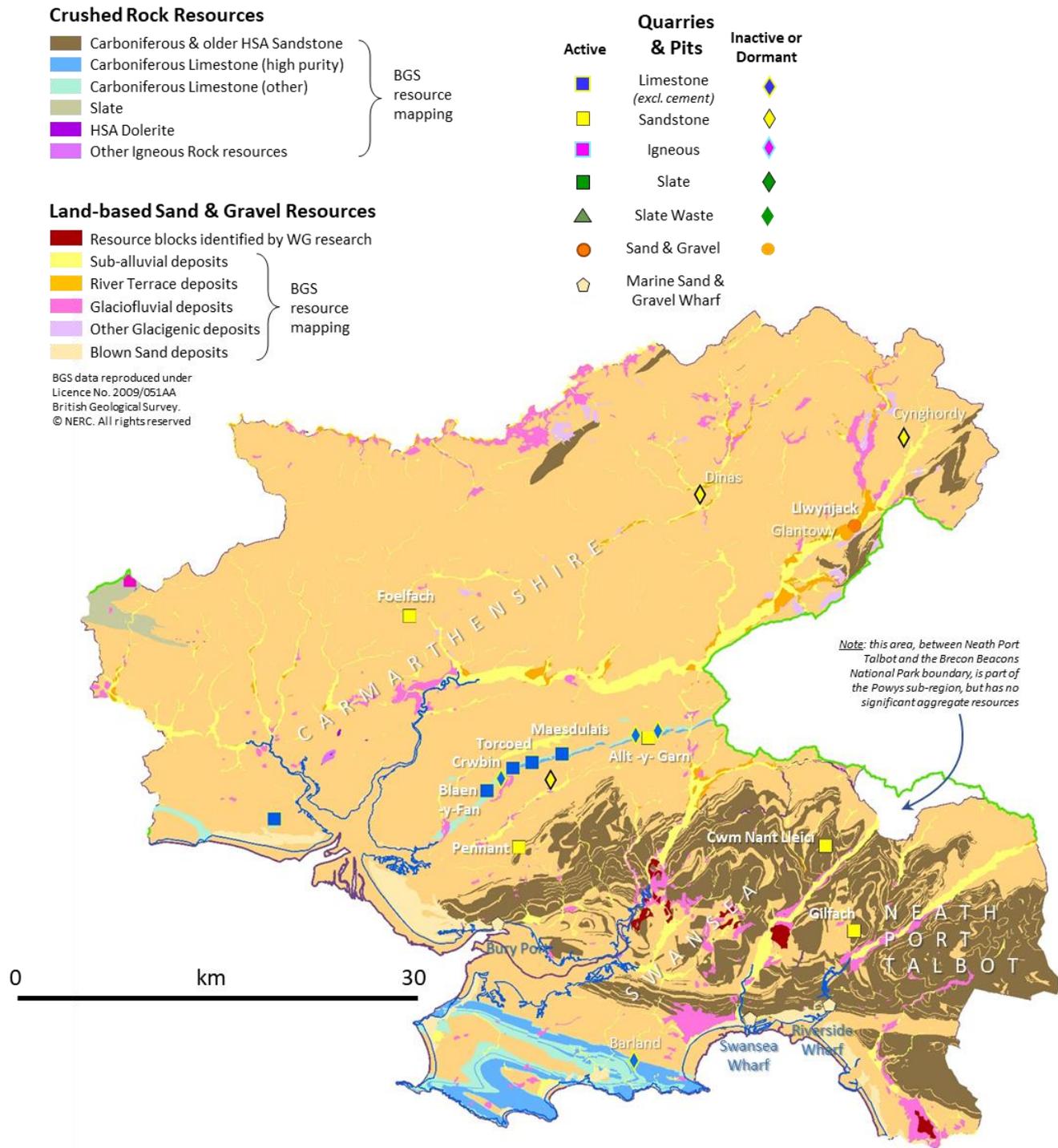
**Figure B3: Aggregate Resources, Quarries, Planned Housing Requirements and Environmental Capacity in the West Wales Sub-Region**



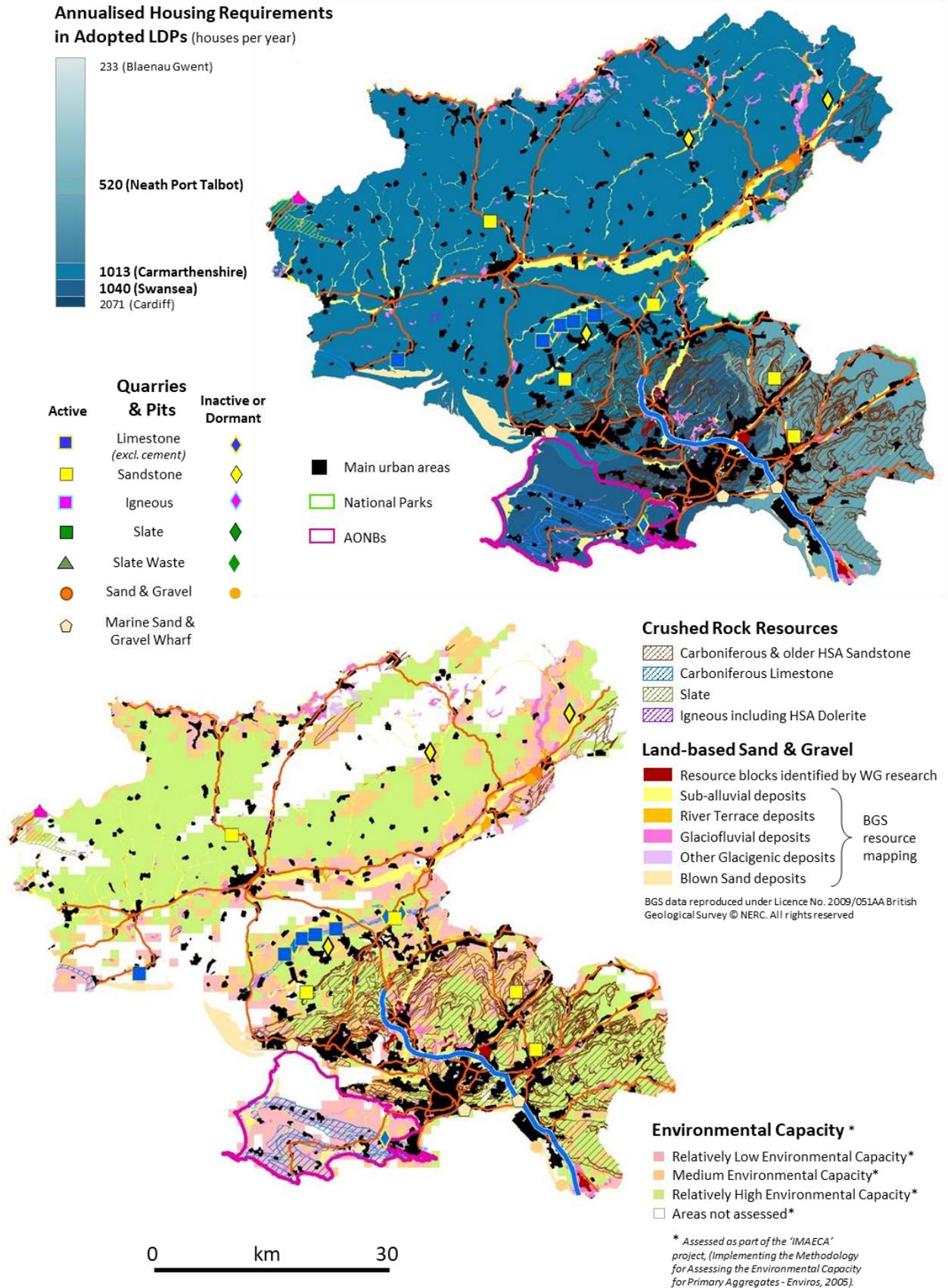
Swansea City Sub Region

- B42. Figure B4 illustrates the distribution of quarries and land-based aggregate resources within the Swansea City sub-region. In this area, the rock resources are mostly confined to the southern part of Carmarthenshire and to Swansea and Neath Port Talbot. They comprise:
- **Carboniferous Limestone**, currently worked at several quarries along a narrow outcrop in southern Carmarthenshire, with a more extensive outcrop in the Gower Peninsula (almost all of which lies within the Gower Area of Outstanding Natural Beauty and is thus most unlikely to be worked);
  - **Carboniferous HSA sandstone**, currently worked predominantly at Cwm Nant Lleici and Gilfach quarries in Neath Port Talbot, and on a much smaller scale, at Pennant Quarry in Carmarthenshire, but extending though all areas in between, including Swansea itself;
  - **Silurian sandstone**, currently worked only at Foelfach, in Carmarthenshire
  - Small, isolated outcrops of **igneous rocks**, only one of which (at Garn Wen in western Carmarthenshire) is currently worked; and
  - **Ordovician slates**, in the same area of western Carmarthenshire, which are not worked at all.
- B43. In addition, there are **glaciofluvial sand & gravel** deposits in various parts of sub-region, including a number of potential resource blocks identified by the Symonds Group study for Welsh Assembly (Thompson *et al* 2000). At present, however, the only operational site is a very small, intermittently active area of river gravel extraction at Llwynjack in the Tywi valley.
- B44. Figure B5 illustrates the relationships of the various resources and quarries to issues relating to the likely pattern of demand (as indicated by proximity to existing urban areas, planned housing requirements and the primary road network); and issues relating to environmental capacity. As can be seen from these maps, the limestone quarries appear to be reasonably well-placed (given the distribution of unconstrained resources) in terms of their proximity to Swansea and adjoining urban areas. A number of inactive quarries are also present along the same narrow limestone outcrop in Carmarthenshire, close to four of the currently active sites, implying that there would be scope for increasing supplies from this area if demand were to increase. Given the constraints which apply to virtually all other limestone outcrops in the area, there would be no opportunity to change the overall pattern of limestone supply.
- B45. The Carboniferous HSA sandstones within the area primarily comprise those of the westernmost part of the South Wales Coalfield (i.e. the 'Pennant' Sandstones) and are highly sought-after as premium, skid-resistant road surfacing aggregates. The two main operational quarries (Gilfach and Cwm Nant Lleici) export to England, as well as supplying local markets. In the case of Cwm Nant Lleici, more than 50% of the output is distributed by rail, with a much lower proportion being transported by rail from Gilfach. The location of both quarries, within the eastern part of the sub-region, and close to the Neath Abbey railhead, is therefore sensible, from a proximity point of view. Gilfach is also within an area of high environmental capacity, as are most of the unworked resources in Neath Port Talbot, though that is not the case for Cwm Nant Lleici.

**Figure B4: Aggregate Resources and Quarries in the Swansea City Sub-Region**



**Figure B5: Aggregate Resources, Quarries, Planned Housing Requirements and Environmental Capacity in the Swansea City Sub-Region**



- B46. As noted in the main document, there would be some merit in seeking to redistribute future HSA sandstone within the region, in order to provide a more equitable distribution between Neath Port Talbot and Swansea (which has the same resources but no current production and, hitherto, no apportionments). This would, potentially, enable advantage to be taken of Pennant Sandstone outcrops within Swansea that are located in areas of relatively high environmental capacity (for example close to Junction 44 of the M4, south of Pontardawe, or between Pontardawe and Pontarddulais). In both cases, however, those outcrops lie within a higher part of the Pennant Sandstone sequence, known as the Swansea Beds, which have not, hitherto, been worked on a modern commercial scale and which may be of inferior quality in terms of aggregate properties and/or the continuity and thickness of sandstone units. The suggestion would require further detailed investigations before it could be relied upon.
- B47. In the RTS First Review it was noted that there might also be merit in deliberately seeking to change the existing supply pattern by reducing future output from Neath Port Talbot and increasing that from other LPAs further east within the Pennant Sandstone outcrop (e.g. Rhondda Cynon Taf, Caerphilly, Torfaen or Blaenau Gwent), in order to reduce the transportation distances of HSA material that is exported to England by road, rather than rail. It must be remembered, however, that proximity is only one aspect of sustainability which must be balanced against many other factors. For example, a high proportion of the resource outcrop within Neath Port Talbot coincides with areas of high environmental capacity whereas such areas are more limited further east.
- B48. Older (Silurian) sandstones including the Yr Allt Formation (formerly known as the Bala Series Grits) occur in various parts of northern Carmarthenshire. These are now worked at only one active quarry in the county (Foelfach), and only to supply local markets.
- B49. Igneous rocks (Prescelly dolerite) are currently exploited in only one location, at Garn Wen in Carmarthenshire. The rock has a reasonably high PSV of 57 but not sufficient to qualify as High Specification Aggregate (HSA) and tends to be used as a more general purpose aggregate within the local market area. Other outcrops of igneous rock within the sub-region are confined to localised minor intrusions in the west of Carmarthenshire and are not likely to be seen as commercially viable resources.
- B50. In terms of land-based sand & gravel resources, as noted above these do exist within the sub-region and, although many of those within river valleys, especially, fall within areas of low environmental capacity, others appear to be better placed in this respect. These include resource blocks close to Swansea, identified in the Symonds Group study, and extensive glaciofluvial deposits within the Teifi valley, around Llanybydder in Carmarthenshire. The fact that none of these are being exploited at present suggests that there is insufficient demand and/or commercial interest, not least because of the ready availability of marine dredged sand from the Bristol Channel, which is landed at the Swansea, Riverside and Bury Port wharves (shown in Figure B4). This almost certainly diminishes the commercial prospects for working resources in Swansea, Neath Port Talbot, and much if not all of Carmarthenshire.

#### Powys Sub-Region

- B51. Figure B6, below, shows the distribution of resources and quarries within the county of Powys, excluding the Brecon Beacons National Park in the south, which forms part of a separate sub-region. In this area, despite the widespread occurrence of hard rock resources, those which are regarded as exploitable aggregate resources are far more limited and localised. This is, not least, because of the relatively remote and upland nature of the landscape which dictates that only those resources of exceptional quality and/or proximity to established markets, are actively worked. These comprise:
- **Precambrian HSA Sandstone**, of the Yat Wood and Strinds Formations, worked from very localised inliers at Gore, Dolyhir and Strinds quarries, close to the Herefordshire border, near Kington;
  - **Ordovician HSA sandstone**, of the Cribarth Formation – worked until recently at Cribarth Quarry, which closed in 2014 following the exhaustion of permitted reserves;
  - **Silurian HSA sandstone**, worked in only one part of the extensive outcrop of the Penstrowed Grits Formation, at Tan-y-Foel quarry, north-west of Newtown;

- **Ordovician HSA dolerite**, worked from a large but very localised intrusion at Criggion Quarry near Welshpool;
  - **Ordovician HSA igneous rocks** of the Llanellwedd Volcanic Formation, worked at the very large Builth Wells Quarry;
  - **Ordovician igneous rock**, worked from a localised intrusion within a predominantly shale quarry at Middletown, near Welshpool; and
  - **Devonian Old Red Sandstone**, worked on a very small scale, primarily for building stone, at Tredomen Quarry in the south of the area.
- B52. Limestone resources are largely absent within mid Wales, though a very small outcrop of Silurian limestone is worked alongside HSA sandstones at Strinds Quarry, close to the English border.
- B53. There are also **glaciofluvial** and **fluvial (river terrace and sub-alluvial) sand & gravel** deposits in various parts of sub-region, though none of these is currently exploited. The resources are mostly within the upper reaches of river valleys and are unlikely to offer much in the way of commercially viable opportunities - not least because of the widely dispersed population and hence limited local demand. One site that was previously worked, at Caerfagu, is now a suspended planning permission, with (effectively) no remaining reserves.
- B54. The emphasis in Powys is therefore very clearly on the production, and export to England, of High Specification (skid-resistant) Aggregates. With the exception of Builth and Tan-y-Foel, the HSA quarries exploit very localised geological outcrops. To varying degrees, similar material is likely to exist in adjoining parts of the same formations, but only within a few kilometres of those quarries. Tan-y-Foel is a relatively small quarry which exploits HSA sandstones from the Penstrowed Grits Formation. Whilst the outcrop of this formation is far more extensive, most of it is not suitable for commercial HSA quarrying because of the interbedded nature of the rocks, with the HSA sandstones alternating with largely unsaleable mudstones and shales. For this reason, the formation is not shown on Figure B6, or on B7 (which shows the relationship of the quarries and resources to factors relating to proximity and environmental capacity). Builth Wells Quarry exploits part of a much larger and variable outcrop of volcanic igneous rocks in central Powys. The extent to which similar (HSA) qualities will occur in other parts of those outcrops is not known, but the extremely large permitted reserves which remain at Builth render this immaterial.
- B55. Overall, the scope for significantly modifying the existing supply pattern of sandstone and igneous rock within central Powys is therefore extremely limited. There would be potential benefits to be gained, in terms of proximity, by limiting future planning permissions to resource outcrops closest to the English border, although those areas (around Criggion, Gore and Dolyhir quarries) are seen to have relatively low environmental capacity (in part, at least, because of the existing quarries).

**Figure B6: Aggregate Resources and Quarries in the Powys Sub-Region**

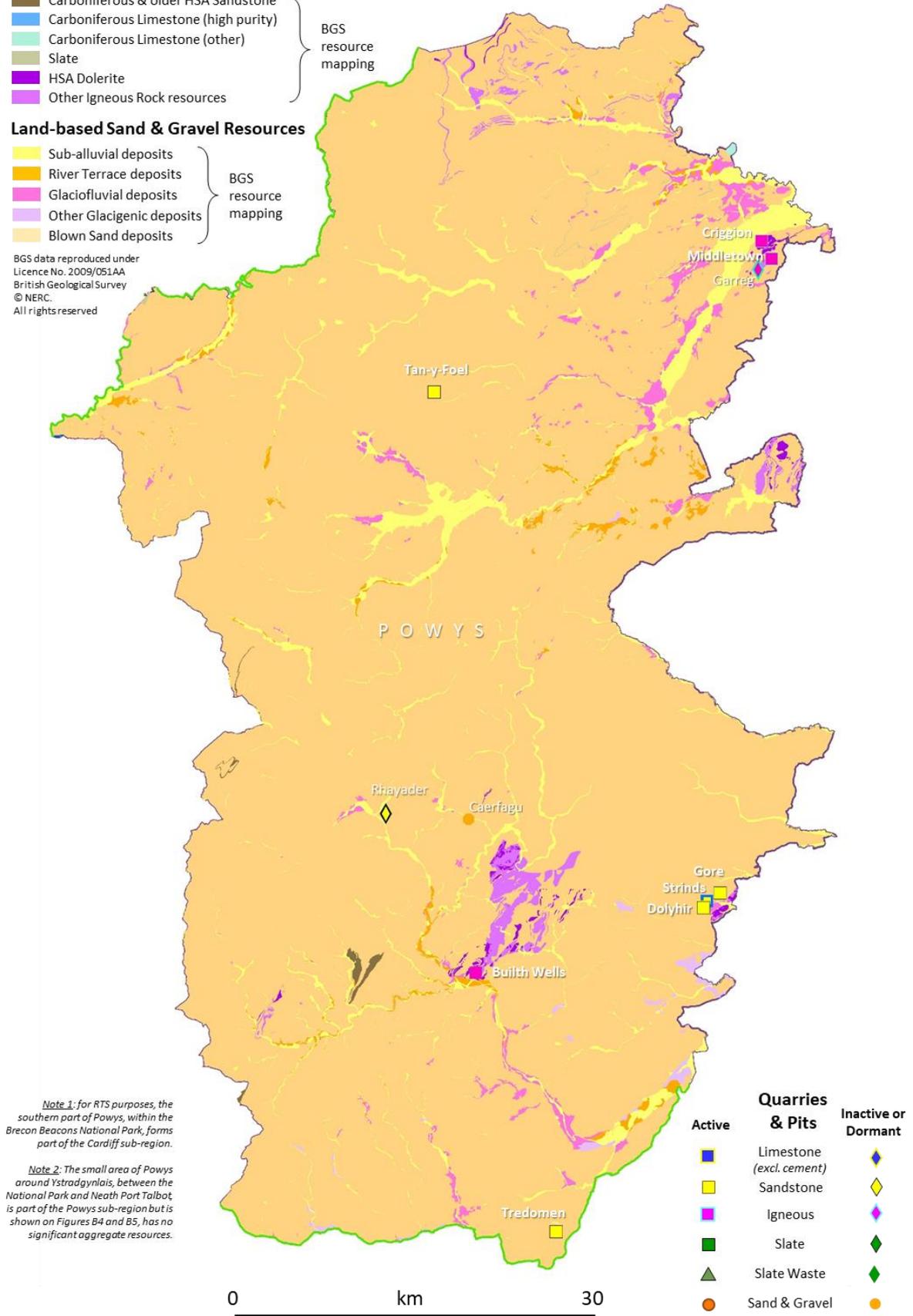
**Crushed Rock Resources**

- Carboniferous & older HSA Sandstone
  - Carboniferous Limestone (high purity)
  - Carboniferous Limestone (other)
  - Slate
  - HSA Dolerite
  - Other Igneous Rock resources
- BGS resource mapping

**Land-based Sand & Gravel Resources**

- Sub-alluvial deposits
  - River Terrace deposits
  - Glaciofluvial deposits
  - Other Glacigenic deposits
  - Blown Sand deposits
- BGS resource mapping

BGS data reproduced under Licence No. 2009/051AA British Geological Survey © NERC. All rights reserved



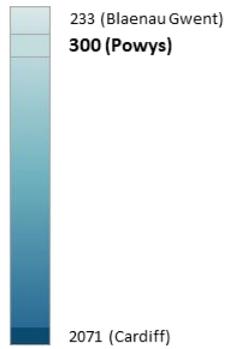
*Note 1:* for RTS purposes, the southern part of Powys, within the Brecon Beacons National Park, forms part of the Cardiff sub-region.

*Note 2:* The small area of Powys around Ystradgynlais, between the National Park and Neath Port Talbot, is part of the Powys sub-region but is shown on Figures B4 and B5, has no significant aggregate resources.

Quarries & Pits		Inactive or Dormant
Active	Limestone (excl. cement)	Inactive or Dormant
	Sandstone	
	Igneous	
	Slate	
	Slate Waste	
	Sand & Gravel	

**Figure B7: Aggregate Resources, Quarries, Planned Housing Requirements and Environmental Capacity in the Powys Sub-Region**

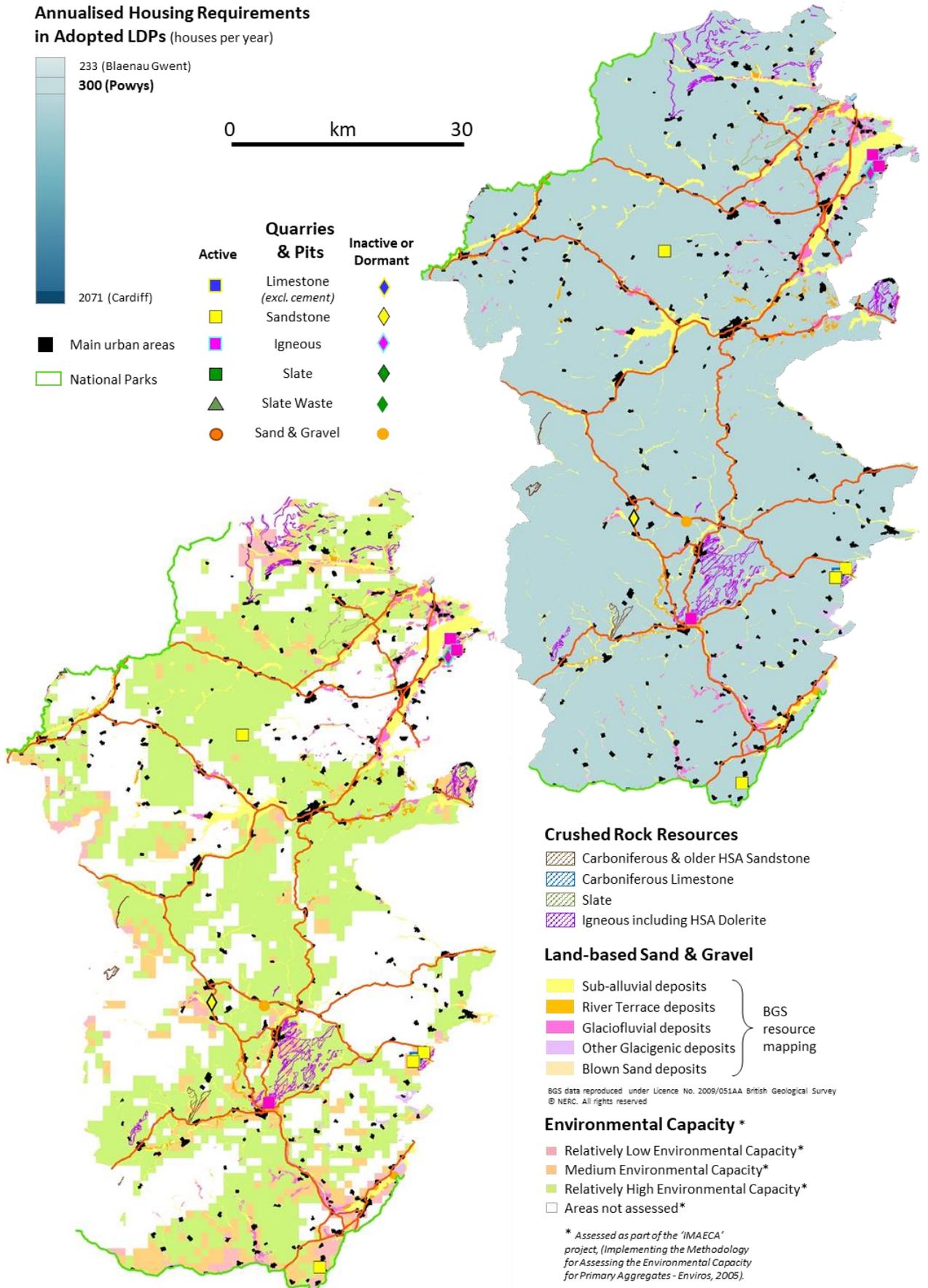
**Annualised Housing Requirements in Adopted LDPs (houses per year)**



0 km 30

- | Active                                 |                          | Quarries & Pits                        | Inactive or Dormant |
|--|--------------------------|--|---------------------|
| <span style="color: blue;">■</span>    | Limestone (excl. cement) | <span style="color: blue;">◆</span>    | Limestone           |
| <span style="color: yellow;">■</span>  | Sandstone                | <span style="color: yellow;">◆</span>  | Sandstone           |
| <span style="color: magenta;">■</span> | Igneous                  | <span style="color: magenta;">◆</span> | Igneous             |
| <span style="color: green;">■</span>   | Slate                    | <span style="color: green;">◆</span>   | Slate               |
| <span style="color: brown;">▲</span>   | Slate Waste              | <span style="color: brown;">◆</span>   | Slate Waste         |
| <span style="color: orange;">●</span>  | Sand & Gravel            | <span style="color: orange;">●</span>  | Sand & Gravel       |

- Main urban areas
- National Parks



- Crushed Rock Resources**
- Carboniferous & older HSA Sandstone
  - Carboniferous Limestone
  - Slate
  - Igneous including HSA Dolerite

- Land-based Sand & Gravel**
- Sub-alluvial deposits
  - River Terrace deposits
  - Glaciofluvial deposits
  - Other Glacigenic deposits
  - Blown Sand deposits
- } BGS resource mapping

BGS data reproduced under Licence No. 2009/051AA British Geological Survey © NERC. All rights reserved

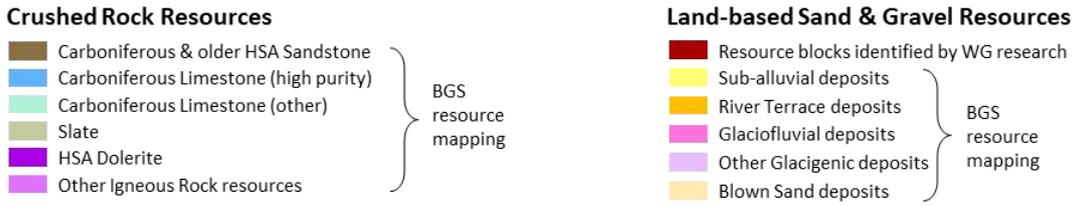
- Environmental Capacity\***
- Relatively Low Environmental Capacity\*
  - Medium Environmental Capacity\*
  - Relatively High Environmental Capacity\*
  - Areas not assessed\*

\* Assessed as part of the 'IMAECA' project, (Implementing the Methodology for Assessing the Environmental Capacity for Primary Aggregates - Enviro, 2005).

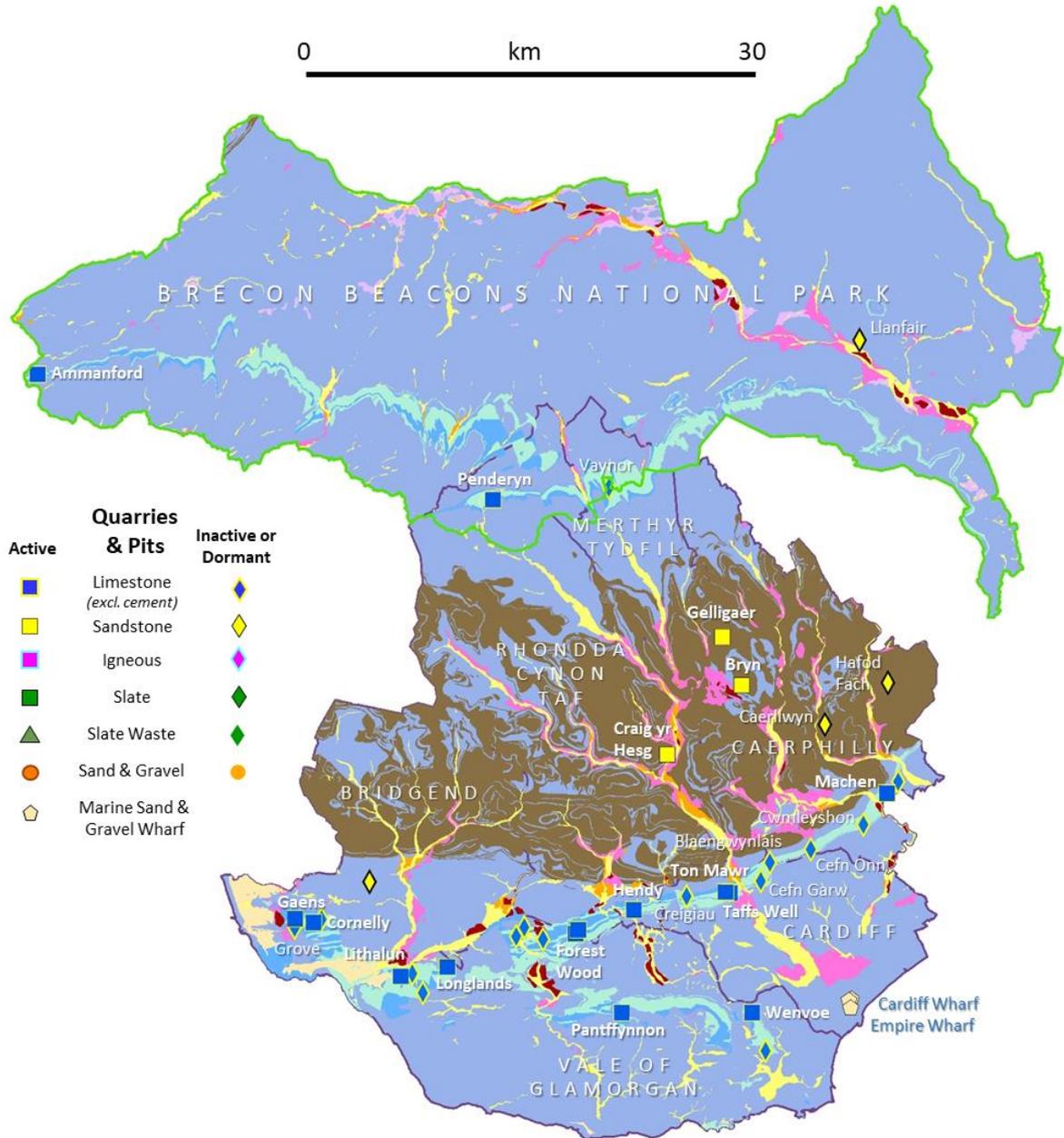
Cardiff City Sub-Region

- B56. This sub-region, as illustrated in Figures B8 and B9, below, comprises Cardiff, the Vale of Glamorgan and Bridgend, along with the valleys directly to the north in Rhondda Cynon Taf, Merthyr Tydfil and Caerphilly, and the Brecon Beacons National Park. The National Park is included primarily because of the major Carboniferous Limestone quarries of Penderyn (active) and Vaynor (currently inactive) which are located within or straddling the southern edge of the Park, and which primarily supply aggregates southwards into the valleys. Ammanford quarry, at the far western edge of the Park is anomalous in this regard, being associated primarily with the neighbouring Swansea sub-region, but its output is very small.
- B57. Crushed rock resources in this sub-region fall into just two, very clearly distinguished groups:
- **Carboniferous HSA sandstone** resources within the coalfield area which, like those to the west, are highly sought-after as sources of premium, skid-resistant road surfacing aggregates. They are exploited by a number of specialist quarries – Craig-yr-Hesg, Gelligaer, Bryn and Hafod Fach (currently inactive) which supply much of their output to England; and
  - **Carboniferous Limestone** resources, to the north and south of the coalfield, which are host to a large number of active and inactive quarries, focused primarily on the supply of general purpose construction aggregates into Cardiff and other centres of demand within the area.
- B58. **Land-based sand & gravel resources** have also been identified within the area, primarily within the valleys. However, many of these are either sterilised by existing urban development or lie within the National Park, and none are currently worked. Instead, the area is entirely dependent, for natural sand, on marine-dredged material from the Bristol Channel which is landed in Cardiff.
- B59. The Carboniferous ‘Pennant’ Sandstone quarries are generally well-placed, within the overall resource outcrop, to supply both local markets within SE Wales and to export HSA to England, though none of them is rail-connected. The sales, both for local consumption and exports, include end-uses other than skid resistant road surfacing, though this is usually because it is often convenient and economical to use the same aggregate in some of the lower layers of road construction as that which is required for use in the surface course.
- B60. Pennant Sandstone resources are widespread within the sub-region, where they coincide, to some extent, with areas of relatively high environmental capacity - particularly within parts of Bridgend, Rhondda Cynon Taf and Caerphilly. Whilst these areas are less extensive than those within Neath Port Talbot and Swansea in the adjoining sub-region (see para’s B45 to B47 above), they may, nevertheless offer prospects for future resource development, as indeed may those of lower apparent capacity - particularly in the case of extensions to existing quarries. In terms of proximity to export markets, these areas offer greater benefits than those further west, though there is less opportunity (if any) for access to railheads. These may be important factors when considering the pattern of future allocations, though this is not required at present within this sub-region (see Chapter 5 of the main document).
- B61. The Carboniferous Limestone resources within this sub-region occur in two distinct areas: the **north crop** (to the north of the South Wales coalfield); the **south crop** (to the south of the coalfield). Each of these areas is considered separately, below.
- B62. Within the north crop, the limestones occur almost entirely within the Brecon Beacons National Park and are currently (or have until recently been) worked at two main sites: Penderyn (within the National Park, in the northern part of Rhondda Cynon Taf); and Vaynor (north of Merthyr Tydfil, on the boundary of the National Park). Both of these sites are well-placed, in terms of proximity, to serve the densely populated valleys of the South Wales coalfield, with most of those areas being within 20 to 30km of the quarries. However, the location of the quarries within areas of low environmental capacity and wholly or partly within the National Park places major constraints on any future expansion. In the case of Vaynor Quarry, the adjoining resources outside the National Park are partially sterilised by other development and could not be developed as an extension of the existing quarry.

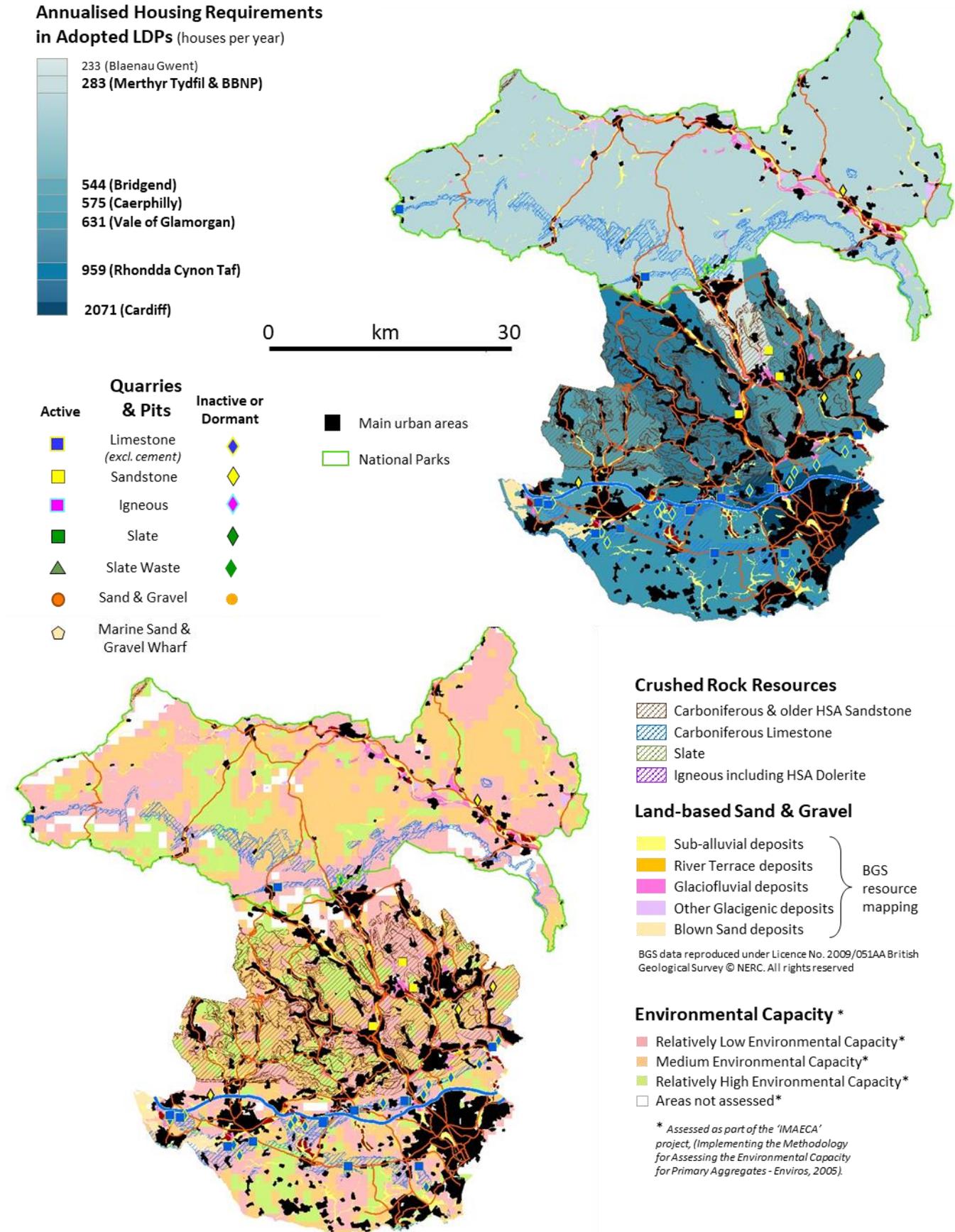
**Figure B8: Aggregate Resources and Quarries in the Cardiff City Sub-Region**



BGS data reproduced under Licence No. 2009/051AA British Geological Survey © NERC. All rights reserved



**Figure B9: Aggregate Resources, Quarries, Planned Housing Requirements and Environmental Capacity in the Cardiff City Sub-Region**

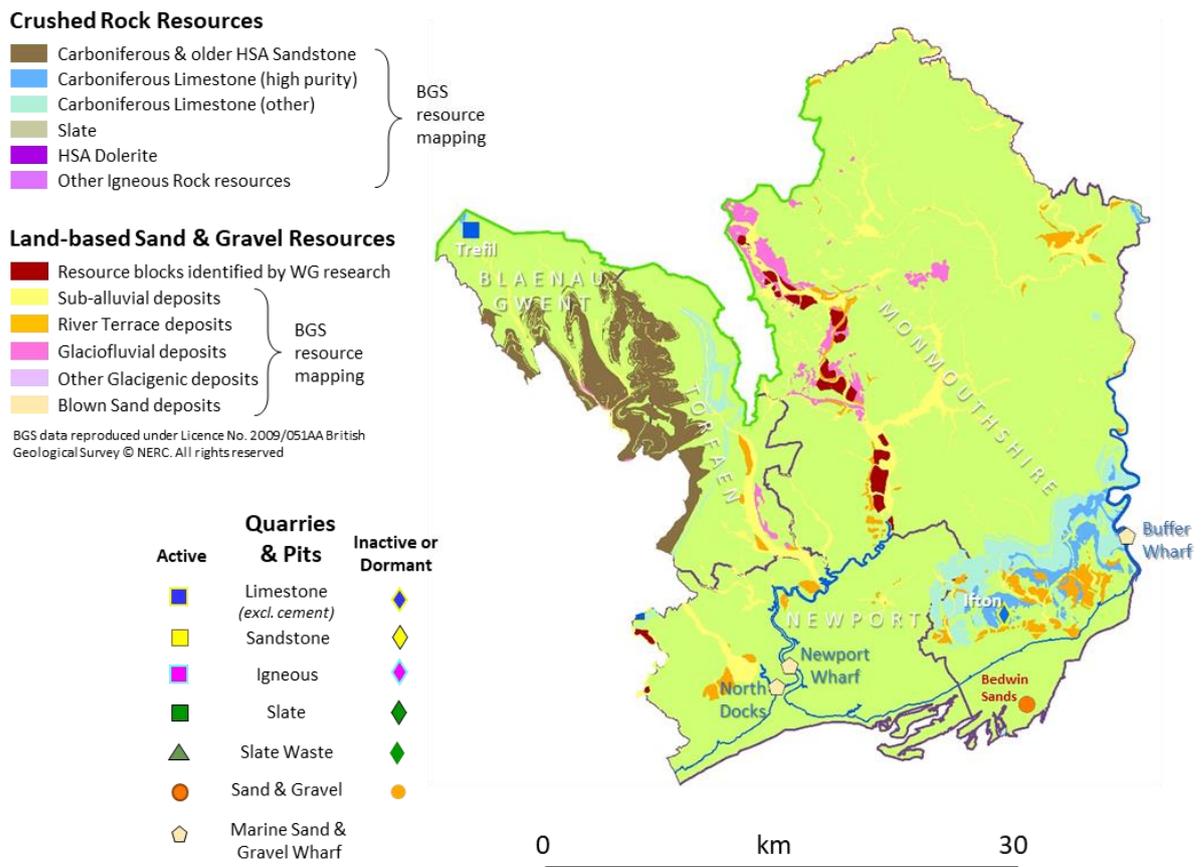


- B63. The second, and most important area of Carboniferous Limestone resource in the Cardiff City sub-region is that within the 'south crop', extending from Bridgend in the west, through the Vale of Glamorgan and Cardiff to Caerphilly in the east. No less than ten active limestone aggregate quarries are located in this area, although one of these (Cornelly) supplies industrial limestone, to the steelworks at Port Talbot, as well as aggregates. Most of these units are located close to the M4 motorway and, together, they are well-placed to supply most of the Cardiff city sub-region as well as the markets in Port Talbot to the west and Newport and Torfaen, to the east.
- B64. Almost all of the south crop resources fall within areas of relatively low environmental capacity (though these are less constrained than those within the National Park). Areas with higher capacity appear to be those in the southernmost part of Caerphilly, in the east, and around Cowbridge in the Vale of Glamorgan, further west. Either of those areas could potentially offer prospects for future resource development, though extensions to existing quarries within the area would be less disruptive and more likely to be preferred.
- B65. As noted above, there is currently no land-based sand & gravel extraction within the Cardiff City sub-region (or indeed within the whole of SE Wales), and this has generally been the case for decades. This is due in part to the ready availability of marine dredged sand from both the Severn Estuary and the Bristol Channel, but also reflects the environmental sensitivity of many of the inland areas which might contain potentially suitable resources. The situation is compounded by the lack of detailed knowledge of those resources (not least because there has been virtually no history of extraction). Reconnaissance-level surveys commissioned by the Welsh Assembly (Thompson *et al*, 2000, 2002) identified a series of potential resource blocks, which are shown by the deep red shading on the maps. Most of those in the Cardiff sub-region are located within the Brecon Beacons National Park, but others are located close to and south of the M4 motorway in the southern part of the area. Most of these fall within areas which have since been assessed as being of relatively low environmental capacity, though some of them, at least, may justify further investigation.

#### Former Gwent Sub-Region

- B66. Figures B10 and B11, below, illustrate the distribution of land-based aggregate resources, quarries and marine aggregate wharves within the former-Gwent sub-region (i.e. Blaenau Gwent, Torfaen, Newport and Monmouthshire).
- B67. As in the Cardiff sub-region directly to the west, the crushed rock resources in this area fall into two, very clearly distinguished categories:
- **Carboniferous HSA sandstone** resources within the eastern edge of the coalfield, in Blaenau Gwent and Torfaen. Like those in both Cardiff and Swansea sub-regions to the west, these provide sources of premium, skid-resistant road surfacing aggregates though, in this area, they have yet to be exploited as such; and
  - **Carboniferous Limestone** resources, which crop out in a very limited area in the north of Blaenau Gwent (where they are currently worked at Trefil Quarry); along a narrow, hitherto unworked outcrop at the eastern edge of the coalfield in Torfaen, largely sterilised by existing development; and over a much larger area in southern Monmouthshire (including the currently inactive Ifton Quarry). The latter outcrop extends into the eastern edge of Newport and was formerly worked at Penhow Quarry.
- B68. **Land-based sand & gravel resources** have also been identified within the area, primarily as glacio-fluvial, river terrace and sub-alluvial gravels within the Usk Valley, but also as terrace and sub-alluvial gravels elsewhere. As with the resources in both Cardiff and Swansea sub-regions, none of the deposits are currently worked. Marine-dredged sand is, instead, obtained from licences within the Bristol Channel and the Severn Estuary, and from a planning permission (above the low water mark) on the Bedwin Sands. These are landed at Newport Wharf and North Docks, within the Usk estuary, and at Buffer Wharfe on the Wye estuary.

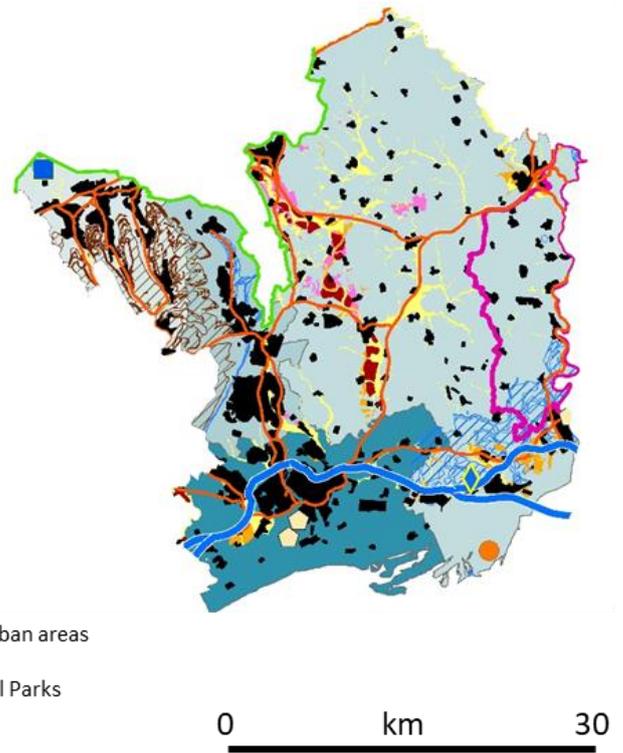
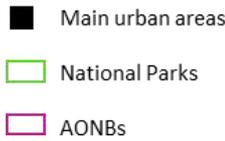
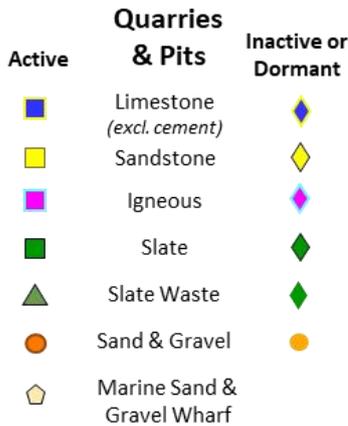
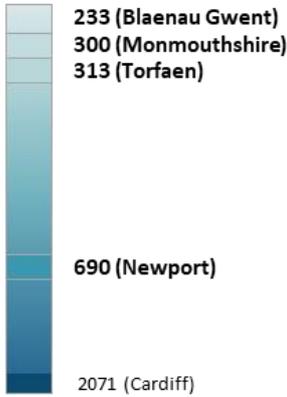
**Figure B10: Aggregate Resources and Quarries in the Former Gwent Sub-Region**



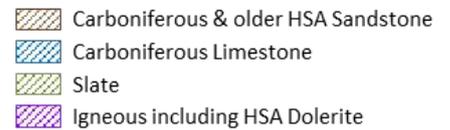
- B69. The Carboniferous Limestone resources provide essential, general-purpose construction aggregates. Those around Trefil Quarry in the north are recognised as a Preferred Area for future extraction in the Blaenau Gwent LDP, but are also constrained by being at the western edge of a subsequently-designated geological SSSI. They are located within an area of relatively low environmental capacity and are directly adjacent to the southern boundary of the Brecon Beacons National Park. Trefil is important, however, in providing the only source of active limestone production in the whole of this sub-region and the most proximal source of construction aggregates for the eastern coalfield valleys. It is also the only location within the whole of the north crop limestone resources in South Wales where an existing permission could be extended without encroaching into the National Park itself.
- B70. A far more extensive outcrop of Carboniferous Limestone resources occurs within southern Monmouthshire, though the eastern part of this outcrop falls within the Wye Valley Area of Outstanding Natural Beauty. There are currently no active quarries in the whole of this area but there is one inactive quarry at Ifton which has significant unworked permitted reserves. Beyond that site, virtually all of the unworked resources fall within areas of low environmental capacity. Pressure for future quarry development here appears to be offset, at present, by the availability of supplies from Machen quarry in Caerphilly, to the west, and from other quarries within the neighbouring Forest of Dean, in England, to the east.
- B71. Although Newport and Torfaen do have Carboniferous Limestone resources, the outcrop in those areas is very thin and much of it is sterilised by existing built development. Most of the available resources there are also within areas of relatively low environmental capacity, though that applies equally to most (but not all) of the south crop limestone resources.

**Figure B11: Aggregate Resources, Quarries, Planned Housing Requirements and Environmental Capacity in the Former Gwent Sub-Region**

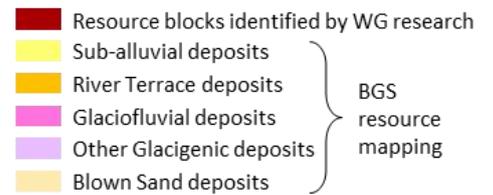
**Annualised Housing Requirements in Adopted LDPs (houses per year)**



**Crushed Rock Resources**

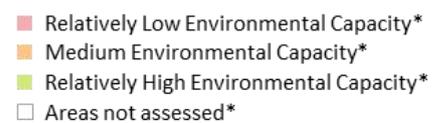


**Land-based Sand & Gravel**



BGS data reproduced under Licence No. 2009/051AA British Geological Survey © NERC. All rights reserved

**Environmental Capacity \***



\* Assessed as part of the 'IMAECA' project, (Implementing the Methodology for Assessing the Environmental Capacity for Primary Aggregates - Enviro, 2005).



- B72. Pennant Sandstone resources are widespread within Blaenau Gwent, and along the high ground at the western edge of Torfaen. Some of the outcrop coincides with areas of relatively high or moderate environmental capacity and one such area, to the south of Cwm, in Blaenau Gwent, has been allocated in the LDP as a Preferred Area for future sandstone extraction. A further area, straddling the Blaenau Gwent /Torfaen border at Tir-Pentwys, further south, is an area of former opencast coal extraction where the remaining spoil had been identified as Preferred Areas for future working of secondary aggregate<sup>5</sup> in both LDPs. However, as noted earlier, an application for sandstone extraction (on the Torfaen side) was dismissed on Appeal, effectively sterilising the resources within both of those areas.
- B73. As noted earlier, there is currently no land-based sand & gravel extraction in the whole of SE Wales, including the Former Gwent sub-region. The extraction which takes place on the Bedwin Sands within the Severn Estuary, though technically a land-based planning permission rather than a marine dredging licence, has traditionally been grouped with other landings of marine sand & gravel.
- B74. The reconnaissance-level surveys commissioned by the Welsh Assembly (Thompson et al., 2000; 2002) identified several potential resource blocks within the lower Usk Valley (shown by the deep red shading on Figure B10 and B11). Again, these fall almost entirely within areas which have since been assessed as being of low environmental capacity, though it is understood that some of the areas have recently been subject to more detailed, and promising, commercial investigations. It remains to be seen whether or not any proposals for developing these resources will be brought forward.

### **Summary of Current Sources of Supply in South Wales**

- B75. Tables B3 to B5, below, list the currently active, inactive and dormant aggregate quarries (respectively) in each of the sub-regions of South Wales, updated to August 2018. The lists exclude quarries devoted to the manufacture of cement, building stone, silica sand, shale or other non-aggregate products, although they include two quarries which supply both aggregates and industrial limestone.

**Table B3: Active Aggregate Quarries in South Wales (2018)**

Quarry Name	Operator	Commodity	Easting	Northing
<b>CEREDIGION</b>				
Alltgoch / Bryn	G D Harries & Sons Ltd	Sandstone	249100	248500
Crug-yr-Eryr	R Powell	Sand & Gravel	242075	250310
Glanrafon Gravel Pit	CB Environmental Ltd	Sand & Gravel	260635	280300
Pant	Teifi Sand & Gravel	Sand & Gravel	265825	256575
Penparc	Cardigan Sand & Gravel Co.	Sand & Gravel	220000	248260
Ystrad Meurig (HSA)	Hanson Aggregates	Sandstone	271810	269570
<b>PEMBROKESHIRE</b>				
Blaencilgoed / Gellihalog	G D Harries & Sons Ltd	Limestone	215800	210700
Bolton Hill	G D Harries & Sons Ltd	Igneous	191800	211400
Cefn	Dyffrig Davies	Slate	220500	242900
Glogue	Mansel Davies & Son Ltd	Slate	221900	232840
<b>PEMBROKESHIRE COAST NATIONAL PARK</b>				
Carew	T Scourfield & Sons	Limestone	204900	204300
Pantgwyn	Cware Pantgwyn Quarry Ltd	Sand & Gravel	212400	242820
Rhyndaston	Mason Brothers	Igneous	189250	223625
Trefigin	Cware Trefigin Quarries Ltd	Sand & Gravel	214000	243900
<b>CARMARTHENSHIRE</b>				
Allt-y-garn	Alan Griffiths (Contractors)	Silica Sandstone	258676	215794
Blaen-y-Fan	Gower Plant Hire	Limestone	245640	211520

<sup>5</sup> The RTS requirements for primary aggregate extraction are based on the assumption that secondary and recycled aggregates will continue to contribute to the overall aggregate requirements, as they have done in the past. Secondary aggregate production cannot therefore be utilised to offset the RTS requirements for primary aggregates.

REGIONAL TECHNICAL STATEMENT: FIRST REVIEW - APPENDIX B (SOUTH WALES)

Coygen	GD Harries & Sons Ltd	Limestone	228430	209210
Crwbin	Tarmac	Limestone	247805	213360
Garnbica (Maesdulais)	Gower Plant Hire	Limestone	251720	214610
Garn Wen	G D Harries & Sons Ltd	Igneous	216740	228680
Foelfach	Sigma Rock	Sandstone	239368	225753
Llwynjack	C J Lewis	Sand & Gravel	275400	233100
Pennant	T. Richard Jones Ltd.	Sandstone	248225	206950
Torcoed	Tarmac	Limestone	249000	213870
<b>NEATH PORT TALBOT</b>				
Cwm Nant Lleici (HSA)	Aggregate Industries UK	Sandstone	273175	207080
Gilfach (HSA)	CEMEX UK	Sandstone	275370	199880
<b>POWYS</b>				
Builth Wells (HSA)	Hanson Aggregates	Igneous	305105	252125
Criggion (HSA)	Hanson Aggregates	Igneous	328900	314400
Dolyhir (HSA)	Tarmac	Sandstone	324300	258425
Gore (HSA)	Tarmac	Sandstone	325700	259250
Middletown	Border Hardcore & Rockery	Igneous	329880	312850
Strinds	Tarmac	Limestone	324110	257855
Strinds (HSA)	Tarmac	Sandstone	324110	257855
Tan-y-Foel (HSA)	Breedon / H V Bowen	Sandstone	301240	301460
Tredomen	Powys Stone Supplies	Sandstone	311820	230400
<b>BRECON BEACONS NATIONAL PARK</b>				
Ammanford	Messrs Griffiths & Williams	Limestone	264910	217640
Penderyn	Hanson Aggregates	Limestone	295500	209000
<b>MERTHYR TYDFIL</b>				
Gelligaer (HSA)	Hanson Aggregates	Sandstone	311550	199600
<b>BRIDGEND</b>				
Cornelly	Tarmac	Limestone	283625	180160
Gaen's	T S Rees Ltd	Limestone	282380	180430
<b>RHONDDA CYNON TAF</b>				
Craig-yr-Hesg (HSA)	Hanson Aggregates	Sandstone	307917	191726
Forest Wood	Hanson Aggregates	Limestone	301600	179650
Hendy	Tarmac	Limestone	305340	181095
<b>VALE OF GLAMORGAN</b>				
Forest Wood extension	Hanson Aggregates	Limestone	301425	179400
Lithalun	Hanson Aggregates	Limestone	289560	176500
Longlands	Green Circle Aggregates Ltd	Limestone	292770	177220
Pantyyffynnon Quarry	Seth Hill & Son Ltd	Limestone	304565	174000
Wenvoe	CEMEX UK	Limestone	313410	174000
<b>CAERPHILLY</b>				
Bryn (HSA)	Bryn Aggregates Ltd	Sandstone	312600	196400
Machen	Hanson Aggregates	Limestone	322555	189000
<b>CARDIFF</b>				
Taff's Well	CEMEX UK	Limestone	312200	182200
Ton Mawr	T S Rees Ltd	Limestone	311560	182350
<b>BLAENAU GWENT</b>				
Trefil	Gryphon Quarries Ltd	Limestone	311975	213690

**Table B4: Inactive Aggregate Quarries in South Wales (2018)**

Quarry Name	Operator	Commodity	Easting	Northing
<b>CEREDIGION</b>				
Tylau	W J Evans	Sandstone	258380	260590
<b>PEMBROKESHIRE</b>				
Cronllwyn	Cronllwyn Quarry	Slate Waste	198550	235195
<b>PEMBROKESHIRE COAST NATIONAL PARK</b>				
Bottom Meadow	E Morgan	Limestone	203750	205870
Syke	G D Harries & Sons Ltd	Sandstone	187120	210915
<b>CARMARTHENSHIRE</b>				
Cilyrychen	Tarmac	Limestone	225900	221500
Coed Moelion	Mr N. Richards	Sandstone	250800	212400
Dinas (HSA)	Tarmac	Sandstone	262740	235530
<b>SWANSEA</b>				
Barland	Cuddy Group	Limestone	257540	189530
<b>NEATH PORT TALBOT</b>				
Margam Sand Pit	Associated British Ports	Sand	275500	188500
<b>POWYS</b>				
Rhayader (HSA)	Tarmac	Sandstone	297395	265875
<b>BRECON BEACONS NATIONAL PARK</b>				
Vaynor (part)	Hanson Aggregates	Limestone	303600	209900
<b>MERTHYR TYDFIL</b>				
Vaynor (part)	Hanson Aggregates	Limestone	303600	209900
<b>BRIDGEND</b>				
Cefn Cribbwr	T S Rees Ltd	Sandstone	287400	182800
Grove	Tarmac	Limestone	282249	179871
<b>VALE OF GLAMORGAN</b>				
Ewenny	Tarmac	Limestone	290250	176805
Garwa	Tarmac	Limestone	297940	179840
<b>CAERPHILLY</b>				
Blaengwynlais (part)	Tarmac	Limestone	314610	184265
Cwmleyshon	Hanson Aggregates	Limestone	321000	186930
Hafod Fach (HSA)	Tarmac	Sandstone	322580	196500
<b>CARDIFF</b>				
Blaengwynlais (part)	Tarmac	Limestone	314610	184265
Cefn Garw	Mr E Bassett	Limestone	314000	183000
Creigiau	Tarmac	Limestone	309000	181975
<b>MONMOUTHSHIRE</b>				
Ifton	Hanson Aggregates	Limestone	346400	188770

**Table B5: Dormant (or Suspended) Aggregate Quarries in South Wales (2018)**

Quarry Name	Operator	Commodity	Easting	Northing
<b>PEMBROKESHIRE</b>				
Treffgarne	Sealyham Activity Centre	Igneous	195875	223965
<b>PEMBROKESHIRE COAST NATIONAL PARK</b>				
Penberry	Hendre Eynon Farm Ltd.	Igneous	176940	229220
<b>CARMARTHENSHIRE</b>				
Cynghordy	Mr D Roderick	Sandstone	279400	240300
Glantowy	Mr A Lewis	Sand & Gravel	274745	232375
Limestone Hill	Dan Williams	Limestone	246670	212600
Llwyn-y-Fran	Hobbs Holdings Ltd	Limestone	257690	216032
Pen-y-banc	Mrs Antonia Jones-Davies	Limestone	247035	212960
Pwll-y-March	Gower Plant	Limestone	259475	216380
<b>POWYS</b>				
Caerfagu (suspended)	Caerfagu Products	Sand & Gravel	304400	265350
Garreg	Hanson Aggregates	Igneous	328760	311935
<b>BRECON BEACONS NATIONAL PARK</b>				
Llanfair	Glanusk Estate	Sandstone	320705	219975
<b>BRIDGEND</b>				
Stormy Down	Hobbs Holdings Ltd	Limestone	284185	180380
<b>VALE OF GLAMORGAN</b>				
Argoed Isha	T Pritchard & J Rosser	Limestone	299250	179050
Cnap Twt	Duchy of Lancaster	Limestone	291055	175350
Ruthin	Tarmac	Limestone	297390	179220
St Andrews	Mr T J Bowles	Limestone	314350	171340
<b>CAERPHILLY</b>				
Caerllwyn	Mr & Mrs Thomas	Sandstone	318350	193700
Cefn Onn	Trustees of W. Lewis Estate	Limestone	317400	185200
Ochr Chwith	Hanson Aggregates	Limestone	323325	189810

- B76. Whilst any of the sites listed in these tables may be able to contribute to future supply (subject to the dormant sites obtaining new development consents through the ROMP process<sup>6</sup>), it is only the active and remaining inactive sites which contributed to the reserves figures presented in Table 5.5 and 5.7 of the main document. Reserves at dormant sites are noted separately in those tables. The active sites and some of the currently inactive ones, together with a small number of other sites which have since closed, contributed to the historical sales over the baseline period (2007 to 2016).
- B77. Full lists of active, inactive and dormant sites for individual years prior to 2018 are given in the relevant annual RAWP reports.

### ***Apportionments, Allocations and Guidance to LPAs in South Wales***

- B78. Tables B6 and B7, below, summarise the apportionments, permitted reserves and allocations for land-won sand & gravel and for crushed rock (respectively) which have been assigned to each Local Planning Authority in South Wales.
- B79. The pages which follow set out in more detail the recommendations and guidance for each individual LPA in South Wales, drawing upon the figures set out in these tables. The LPAs are dealt with in alphabetical order. In each case, reference to the 'Plan period' relates to the end date of the Local Development Plan which has been adopted or is nearing completion (whichever is later) for that particular planning authority.

<sup>6</sup> ROMP is the acronym for the Review of Old Mineral Permissions, under the Environment Act 1995. Further details are given in the Glossary at the end of the Main Document.

**Table B6: Apportionments, Reserves and Allocations for Sand & Gravel in South Wales**

Local Planning Authority	New Annualised Apportionment for sand & gravel (mt)	Total Apportionment Required over 22 years	Existing permitted reserves at end of 2016 in mt	Minimum Allocation needed to meet Required Provision (mt)	Additional reserves at Dormant sites, 2016 (mt)
Ceredigion	0.188	4.136	0.510	3.626	0
Pembrokeshire	0.000	0.000	0.000	0.000	0
Pembrokeshire Coast NP	0.118	2.600	2.600	0.000	0
Carmarthenshire	0.003	0.058	0.100	See note 1	0.35
Swansea	0.000	0.000	0.000	0.000	0
Neath Port Talbot	0.000	0.000	0.000	0.000	0
Powys	0.000	0.000	0.000	0.000	0
Brecon Beacons NP	0.000	0.000	0.000	0.000	0
Merthyr Tydfil	0.000	0.000	0.000	0.000	0
Bridgend	0.000	0.000	0.000	0.000	0
Rhondda Cynon Taf	0.000	0.000	0.000	0.000	0
Vale of Glamorgan	0.000	0.000	0.000	0.000	0
Caerphilly	0.000	0.000	0.000	0.000	0
Cardiff	0.000	0.000	0.000	0.000	0
Blaenau Gwent	0.000	0.000	0.000	0.000	0
Monmouthshire	0.000	0.000	0.000	0.000	0
Newport	0.000	0.000	0.000	0.000	0
Torfaen	0.000	0.000	0.000	0.000	0
<b>Sub-totals, South Wales</b>	<b>0.309</b>	<b>6.795</b>	<b>3.21</b>	<b>3.626</b>	<b>0.35</b>
<b>TOTALS Wales</b>	<b>1.353</b>	<b>29.758</b>	<b>18.406</b>	<b>11.394</b>	<b>0.85</b>

SOURCE: Table 5.5 of the main document

1. There is no specific allocation for Carmarthenshire but, subject to collaborative agreement with the LPAs in West Wales, the sand & gravel allocations needed for Ceredigion could potentially be provided, in part, from neighbouring parts of Carmarthenshire, despite being in a different sub-region.

Where allocation requirements are shown these are the minimum amounts required to meet the RTS requirements. In many cases an application for an individual new permission will exceed these amounts, in the interests of economic viability. Such applications should not be rejected purely on the grounds of exceeding the minimum requirements shown here. In some cases, the suggested allocations may already have been partially or entirely fulfilled, either by new permissions granted since 2016, or by allocations that have already been identified in LDPs. See following text for details

**Table B7: Apportionments, Reserves and Allocations for Crushed Rock in South Wales**

Local Planning Authority	New Annualised Apportionment for crushed rock (mt)	Total Apportionment Required over 25 years.	Existing permitted reserves at end of 2016 in mt	Minimum Allocation needed to meet Required Provision (mt)	Additional reserves at Dormant sites, 2016 (mt)
Ceredigion	0.272	6.798	5.370	1.428	0
Pembrokeshire	0.677	16.932	16.720	0.212	0
Pembrokeshire Coast NP	0.259	6.470	10.370	0.000	0
Carmarthenshire	1.102	27.556	59.900	0.000	13.82
Swansea	0.305	7.636	0.000	7.636	0
Neath Port Talbot	0.305	7.636	16.480	0.000	0
Powys	3.519	87.981	139.240	0.000	0
Brecon Beacons NP	0.368	9.200	120.100	0.000	0.36
Merthyr Tydfil	0.199	4.975			
Bridgend	0.699	17.471	27.270	0.000	0.15
Rhondda Cynon Taf	0.753	18.816	9.830	8.986	0
Vale of Glamorgan	0.672	16.806	18.730	0.000	13
Caerphilly	0.535	13.371	31.280	0.000	5.21
Cardiff	1.383	34.578	27.800	6.778	0
Blaenau Gwent	0.201	5.027	1.320	3.707	0
Monmouthshire	0.235	5.866	11.250	0.000	0
Newport	0.434	10.854	0.000	10.854	0
Torfaen	0.258	6.441	0.000	6.441	0
<b>Sub-totals, South Wales</b>	<b>12.177</b>	<b>304.415</b>	<b>495.66</b>	<b>46.043</b>	<b>32.54</b>
<b>TOTALS Wales</b>	<b>18.871</b>	<b>471.781</b>	<b>670.850</b>	<b>81.971</b>	<b>34.20</b>

SOURCE: Table 5.7 of the main document

Where allocation requirements are shown these are the minimum amounts required to meet the RTS requirements. In many cases an application for an individual new permission will exceed these amounts, in the interests of economic viability. Such applications should not be rejected purely on the grounds of exceeding the minimum requirements shown here. In some cases, the suggested allocations may already have been partially or entirely fulfilled, either by new permissions granted since 2016, or by allocations that have already been identified in LDPs. See following text for details.

- B80. As explained more fully in the main document, the figures for each authority are based on the assumptions that future aggregate requirements will increase in future years to reflect the increased planned requirements for house construction, and that supplies of alternative aggregates, from marine, secondary and recycled sources, will continue to be maintained in proportions comparable to those experienced during the baseline period (2007 to 2016).
- B81. The validity of these assumptions will continue to need to be monitored by the planning authority, using information from various data sources and new surveys (e.g. by Welsh Government, NRW, and the Mineral Products Association) and that data will be used to inform a revision of the apportionment requirements, if this is needed, as part of the next review of the RTS.
- B82. It should be emphasised that the annualised apportionment figures are given only as a guide to the calculation of the total apportionment required over the duration of the LDP. In practice, sales

will vary from year to year and there is no requirement for an LPA to maintain or limit those sales in line with the annualised apportionments.

- B83. The need for provision to extend beyond the Plan period is based on the requirement in MTAN1 for maintaining landbanks of 7 years for sand & gravel and 10 years for crushed rock, throughout the full duration of the LDP. Subject to this requirement being met, the overall provision at any given time may comprise both landbanks of permitted reserves and allocations for future working, where these are required.
- B84. In all cases, the recommendations are based on currently available information regarding reserves, production, proximity and environmental capacity. As noted in 'Box 1' of the original RTS documents, the suggested apportionments and allocations may not take fully into account all factors that may be material to the ensuring an adequate supply of aggregates obtained from appropriately located sources. Such factors may include such things as:
- The technical capability of one type of aggregate to interchange for another;
  - The relative environmental cost of substitution of one type of aggregate by another;
  - The relative environmental effects of changing patterns of supply; and
  - Whether adequate production capacity can be maintained to meet the required level of supply.
- B85. For such reasons, and as already noted in Chapter 1 of the main document, *in exceptional circumstances*, and where it is justified by new (e.g. more up to date, more detailed or more precise) evidence, it is open for individual LPAs to depart from the apportionment and allocation figures recommended by the RTS when preparing their LDP policies. In doing so, however, an LPA would need to demonstrate that their intended departure would not undermine the overall strategy provided by the RTS itself (e.g. by working together with other LPAs within the same sub-region to ensure that sub-regional and regional totals are still achieved) and this would need to be reflected in the Statement of Sub-Regional Collaboration (SSRC) agreed with all other constituent LPAs within that sub-region, prior to Examination. Any shared arrangements that may be agreed between individual LPAs would need to offer advantages, in terms of the proximity principle, environmental capacity and other sustainable criteria, compared with the basic RTS recommendations. Guidelines relating to the preparation of SSRCs, including details of the circumstances under which departures from RTS recommendations may be made, are provided at Annex A of the Main Document.
- B86. As noted in MTAN 1, paragraph A3: If the local authorities reach no agreement or if individual local authorities do not accept the Regional Technical Statement, the Welsh Assembly Government will consider its default powers to intervene in the planning process as a last resort.

**BLAENAU GWENT****Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.201 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

**Comparison with existing landbanks**

The total apportionments for Blaenau Gwent, as calculated in Tables 5.5 and 5.7 of the main document, are zero for land-won sand & gravel and 5.027 million tonnes for crushed rock, over 25 years. These compare with existing landbanks of zero for sand & gravel and 1.32 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

**Allocations required to be identified in the Local Development Plan**

In order to address the resulting crushed rock shortfall, new allocations totalling at least 3.707 million tonnes will need to be identified within the LDP. The main requirement (as in both previous editions of the RTS) is to supplement the existing reserves of Carboniferous Limestone. A Preferred Area for this has already been identified within the adopted LDP but, as the landbank is substantially less than the minimum requirement of 10 years, there is now an urgent requirement for new permitted reserves.

The area also has substantial resources of HSA sandstone which, though not urgently required, would be beneficial in terms of helping to shift the overall pattern of sandstone production further east, towards the principal markets in England. Again, a preferred area for this has been identified within the LDP, along with part of the former opencast site at Tir-Pentwys, where the spoil tips are identified in the LDP as a preferred area for secondary aggregate production. Working of those resources, however, would be dependent on access through the Torfaen part of the site, where a recent application has been dismissed on appeal, effectively rendering the resources unworkable unless and until an alternative means of access is agreed.

Consideration should also be given to whether any of the factors set out in paragraph B84 above give rise to any further requirements for resource allocations.

In view of the fact that the neighbouring authorities of Torfaen and Newport may have difficulty in meeting their own new apportionments, given the limited resources in those areas, Blaenau Gwent may *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, need to work in collaboration with those authorities, and with Monmouthshire, in order meet the combined requirements for the Former Gwent sub-region as a whole. Where different apportionments are agreed, these will need to be set out in a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

**Use of alternative aggregates**

In the absence of any significant known land-based sand & gravel resources, Blaenau Gwent relies upon supplies of marine-dredged sand, imported via three wharves in Newport.

Secondary aggregates in the form of overburden material from former opencast coal workings have been identified as a Preferred Area at Tir Pentwys, straddling the border with neighbouring Torfaen. The exploitation of the material within Blaenau Gwent, however, is dependent on access through the Torfaen part of the site.

There is, however, likely to be continued recycled aggregate production within the area from construction, demolition and excavation wastes.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

**Safeguarding of primary aggregate resources**

Relevant resources of both crushed rock aggregates and land-based sand & gravel have been safeguarded within the LDP, in accordance with detailed advice based on the use of British Geological Survey mapping, prior to the publication of the BGS safeguarding maps.

**Safeguarding of wharves and railheads**

All existing and potential new railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## BRIDGEND

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.699 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

These figures exclude the provision of limestone for non-aggregate use (primarily for use in the steel industry within neighbouring Neath Port Talbot), for which separate consideration will need to be given in the LDP.

### **Comparison with existing landbanks**

The total apportionments for Bridgend, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 17.471 million tonnes for crushed rock, over 25 years. These compare with existing landbanks (excluding dormant sites) of zero for sand & gravel and 27.27 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016). These figures exclude limestone reserves which are allocated for non-aggregate use.

### **Allocations required to be identified in the Local Development Plan**

In view of the surplus of existing permitted reserves for crushed rock, and the lack of sand & gravel production, no further allocations for future working are required to be identified within the LDP. However, consideration should be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

Consideration is also needed regarding the extent to which some of the surplus of Carboniferous Limestone reserves in Bridgend might, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, be needed to accommodate any increase in apportionment, to compensate for shortages of supply of such aggregate in neighbouring LPAs. If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

### **Treatment of Dormant sites**

One dormant limestone quarry exists within Bridgend, as detailed in Table B5, above. The planning authority should assess the likelihood of this quarry being worked within the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Assessment. If there is a likelihood of reactivation, and if the quarry is considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 5.14.19 of Planning Policy Wales, it may be offset against any requirements that may otherwise be identified for allocations for future working.

### **Use of alternative aggregates**

Bridgend is currently reliant, for supplies of sand, on marine-dredged material imported via wharves in neighbouring Neath Port Talbot (and perhaps Cardiff). This is despite the existence of limited potential land-based resources within its area, as indicated on BGS resource maps

and in reconnaissance-level mapping carried out for the Welsh Government by Symonds Group Ltd. in 2000.

There are no secondary aggregate sources of any significance within Bridgend, although steel/blast furnace slag may be delivered by road from Neath-Port Talbot.

In addition, construction, demolition and excavation wastes are generated and recycled at a number of points within the area.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

#### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

#### **Safeguarding of wharves and railheads**

All existing and potential new railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## CAERPHILLY

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.535 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Caerphilly, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 13.371 million tonnes for crushed rock, over 25 years. These compare with existing landbanks (excluding dormant sites) of zero for sand & gravel and 31.28 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

In view of the surplus of existing permitted reserves for crushed rock, and the lack of sand & gravel production, no further allocations for future working are required to be identified within the LDP. However, consideration should be given to whether any of the other factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

Consideration is also needed regarding the extent to which some of the surplus of crushed rock reserves in Caerphilly might, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, be needed to accommodate any increase in apportionment to compensate for shortages of Carboniferous Limestone supply in neighbouring LPAs. If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

### **Treatment of Dormant sites**

A total of three dormant quarries exist within Caerphilly, as detailed in Table B5, above. The planning authority should assess the likelihood of each of these sites being worked within the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Assessment. Where there is a likelihood of reactivation, and where the site(s) in question are considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 5.14.19 of Planning Policy Wales, they may be offset against any requirements that may otherwise be identified for allocations for future working.

### **Use of alternative aggregates**

In the absence of any current land-based sand & gravel pits within Caerphilly or adjoining areas (despite the existence of potential land-based resources, as indicated on BGS resource maps), supplies of sand from marine-dredged sources are imported via the wharves in Newport and/or Cardiff. All of Caerphilly lies within 30 to 40 km of those wharves.

Substantial quantities of colliery spoil are understood to exist above Bedwas, Machen, and Llanbradach, but these are generally remote from transport links and therefore difficult to

utilise effectively. Moreover, as noted in the original RTS, previous efforts to obtain planning permission for the removal of tips in Machen have been refused.

Recycled aggregates from construction, demolition and excavation wastes are likely to be available within most of the major towns within the borough.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

#### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

#### **Safeguarding of wharves and railheads**

All existing and potential new railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## CARDIFF

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **1.383 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Cardiff, as calculated in Tables 5.5 and 5.7 of the main document, are zero for land-won sand & gravel and 34.578 million tonnes for crushed rock, over 25 years. These compare with existing landbanks of zero for sand & gravel and 27.8 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

In order to address the resulting crushed rock shortfall, new allocations totalling at least 6.778 million tonnes will need to be identified within the LDP. The requirement in this area is for Carboniferous Limestone. Consideration should also be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

In the event that allocations (or new permissions) cannot be made to address the shortfall, and *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, consideration may need to be given to collaborative working with neighbouring LPAs within the same sub-region, such that some of the required provision (apportionment) is effectively transferred. If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

### **Use of alternative aggregates**

Cardiff is reliant for its sand on marine-dredged aggregates from the Bristol Channel, imported via two wharves within Cardiff docks. Although potential land-based resources are indicated within its area, on BGS resource maps, most of these are sterilised by existing built development.

Some secondary aggregates are available, including steel slag from the electric arc furnace steelworks in Cardiff, but most arisings are fully utilised as they are produced, with relatively small stockpiles.

Construction, demolition and excavation wastes suitable for recycling as aggregate materials are likely to be extensive, amounting to a considerable proportion of the regional total.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

**Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

**Safeguarding of wharves and railheads**

All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## CARMARTHENSHIRE

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: **0.003 million tonnes per year** until the end of the Plan period and for 7 years thereafter.
- Crushed rock aggregates provision: **1.102 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Carmarthenshire, as calculated in Tables 5.5 and 5.7 of the main document, over the 22-year horizon required for sand & gravel, and the 25-year timescale required for crushed rock, are 0.058 million tonnes for land-won sand & gravel and 27.556 million tonnes for crushed rock. These figures compare with existing landbanks (excluding dormant sites) of 0.1 million tonnes for sand & gravel and 59.9 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

In view of the slight surplus of existing permitted reserves of sand & gravel within Carmarthenshire, no allocations are specifically required to be identified in the LDP. However, some of the resources in Carmarthenshire lie in close proximity to the neighbouring authorities of Ceredigion, Pembrokeshire and the Pembrokeshire Coast National Park, where there is a need to find new sources of sand & gravel outside the National Park. Consideration is therefore also needed regarding the extent to which, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, there may be a need to identify allocations to assist with the future provision of sand & gravel to those areas. This would necessitate a transfer of apportionments (for sand & gravel) between the authorities (but would not apply to the apportionment for crushed rock). If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

In view of the substantial surplus of existing crushed rock reserves, no crushed rock allocations are required to be made in the LDP. However, consideration should also be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

### **Treatment of Dormant sites**

A total of six dormant quarries exist within Carmarthenshire, as detailed in Table B5, above. The planning authority should assess the likelihood of each of these sites being worked within the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Assessment. Where there is a likelihood of reactivation, and where the site(s) in question are considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 5.14.19 of Planning Policy Wales, they may be offset against any requirements that may otherwise be identified for allocations for future working.

### **Use of alternative aggregates**

Carmarthenshire is currently reliant upon supplies of sand from marine-dredged sources in the outer Bristol Channel, imported via Burry Port. This is despite the existence of potential land-based resources within its area, as indicated on BGS resource maps.

There are no known sources of secondary aggregates within the County.

Recycled aggregates are likely to be minimal over most of the County, and widely dispersed, although greater concentrations are likely to arise in the south east of the county, coincident with the redevelopment of former industrial areas.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

### **Safeguarding of wharves and railheads**

All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## CEREDIGION

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: **0.188 million tonnes per year** until the end of the Plan period and for 7 years thereafter.
- Crushed rock aggregates provision: **0.272 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Ceredigion, as calculated in Tables 5.5 and 5.7 of the main document, over the 22-year horizon required for sand & gravel, and the 25-year timescale required for crushed rock, are 4.136 million tonnes for land-won sand & gravel and 6.798 million tonnes for crushed rock. These figures compare with existing landbanks of 0.51 million tonnes for sand & gravel and 5.37 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

To address the sand & gravel shortfall, sand & gravel allocations totalling at least 3.626 million tonnes will need to be identified within the LDPs of this and/or neighbouring authorities of Pembrokeshire and Carmarthenshire. Existing specific site allocations of 1.8mt at Penparc and approximately 0.15mt at Pant Quarry can be deducted from this total, leaving a requirement of at least 1.676 million tonnes still to be identified.

Additional crushed rock allocations totalling at least 1.428 million tonnes will also need to be made. Consideration should also be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

In practice, given the close proximity of Ceredigion to the neighbouring authorities of Pembrokeshire and the Pembrokeshire Coast National Park, where there is a need to find new sources of sand & gravel outside the National Park, Ceredigion should continue to work in collaboration with those authorities and, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, may also need to collaborate with neighbouring Carmarthenshire. If necessary, Ceredigion may need to increase its share of the combined sub-regional apportionment for sand & gravel, compared with the figures given above. This does not apply to the apportionment for crushed rock. If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

Any new allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

As noted in the main document, it may be better (in terms of deliverability) to rely on specific sites in neighbouring authorities (additional to the LPAs' own requirements), where these have been agreed through collaborative working, in preference to relying upon highly uncertain Areas of Search.

### **Use of alternative aggregates**

As noted in the original RTS, Ceredigion is beyond the notional haulage limit for marine-dredged aggregate from the Bristol Channel. Although there had been some indications that southern Cardigan Bay could provide marine sand and gravel in future years, there has been

no further development of this, not least because of the high costs of infrastructure associated with setting this up as a new source of supply.

There are no sources of secondary aggregate within the area and recycled aggregate sources are both minimal and widely dispersed.

**Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

**Safeguarding of wharves and railheads**

Ceredigion has no operational wharves but has a number of small working harbours. These, together with all existing railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

**MERTHYR TYDFIL /BRECON BEACONS NATIONAL PARK****Apportionment for the future provision of land-won primary aggregates**

The two planning authorities are treated jointly in order to protect the commercial confidentiality of data for the small number of quarries involved, and because one of those quarries (Vaynor) straddles the boundary between the two authorities. Together, they are required to make future provision for land-won primary aggregates within their Local Development Plans on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: 0.199 million tonnes per year within Merthyr Tydfil and 0.368 million tonnes per year within the National Park until the end of the Plan period and for 10 years thereafter.

The figures exclude the provision of limestone for non-aggregate use, for which separate consideration may need to be given in the LDPs.

**Comparison with existing landbanks**

The total apportionments for Merthyr Tydfil and the Brecon Beacons National Park, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 14.175 million tonnes for crushed rock, over 25 years (made up of 4.975 million tonnes in Merthyr Tydfil and 9.2 million tonnes in the National Park). These compare with existing landbanks (excluding dormant sites) of zero for sand & gravel and more than 120 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016). These figures exclude any limestone reserves which are allocated for non-aggregate use.

**Allocations required to be identified in the Local Development Plans**

In view of the substantial surplus of existing permitted crushed rock reserves, and the lack of any sand & gravel extraction in either authority, no further allocations are required to be identified within either of the LDPs. However, consideration should be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations. If any adjustments are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A of the RTS Main Document, before any of the constituent LDPs are submitted for Examination.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

Paragraph 49 of MTAN 1 notes that landbanks are not required to be maintained within National Parks. For this reason, no allocations should be identified within the Brecon Beacons National Park, unless there are no environmentally acceptable alternatives and efforts should be made to gradually transfer production which currently takes place within the National Park to neighbouring authorities. Given that this production relates only to limestone and that it serves markets which, if not within the National Park, are largely (if not exclusively) to the south and west (mostly within the Cardiff City sub-region), it is logical that limestone quarries and resources in those areas should be the main focus of any substitution which can be achieved. This has been the intention of the present Review of the RTS and is the reason why the apportionments for the National Park have been reduced.

**Treatment of Dormant and Suspended sites**

One dormant sandstone quarry exists within the Brecon Beacons National Park, as detailed in Table B5, above. The planning authority should assess the likelihood of this site being worked within the Plan period, subject to the completion of an initial review of planning conditions and

submission of an Environmental Impact Assessment. Where there is a likelihood of reactivation, and if the site considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 5.14.19 of Planning Policy Wales, the permitted reserves may be offset against any requirements that may otherwise be identified for allocations for future working.

#### **Use of alternative aggregates**

Some imports of sand from marine-dredged sources, imported primarily via wharves in Cardiff to the south, are likely to be utilised in the absence of any current land-based sand & gravel extraction. This is despite the existence of potential land-based resources within both Merthyr and the National Park, as indicated on BGS resource maps and in reconnaissance-level mapping carried out for the Welsh Government by Symonds Group Ltd. in 2000.

As noted within the original RTS, no significant amounts of secondary aggregate are present within Merthyr Tydfil, but volumes of construction, demolition and excavation wastes are likely to be widely available in the main valley areas.

The residual requirements for primary land-won aggregates assume that these alternative materials will continue to be utilised and the authority should continue to encourage this.

Within the National Park, there are very few ongoing mineral workings of any kind and therefore only limited, if any, sources of secondary aggregate. Similarly, there are likely to be only limited quantities of recycled material from local construction and demolition projects. Nevertheless, the National Park Authority should continue to promote the use of these materials where they are available.

#### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDPs of both authorities, in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

#### **Safeguarding of wharves and railheads**

All existing and potential new railheads should be identified for safeguarding within both LDPs, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## MONMOUTHSHIRE

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.235 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Monmouthshire, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 5.866 million tonnes for crushed rock, over 25 years. These compare with existing landbanks (excluding dormant sites) of zero for sand & gravel and 11.25 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

In view of the surplus of existing permitted reserves for crushed rock, and the lack of sand & gravel production, no further allocations for future working are specifically required to be identified within the LDP. However, consideration should be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

In view of the fact that the neighbouring authorities of Torfaen and Newport may have difficulty in meeting their own new apportionments, given the limited resources in those areas, Monmouthshire may, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, need to work in collaboration with those authorities, and with Blaenau Gwent, in order to meet the combined requirements for the Former Gwent sub-region as a whole. As illustrated in Figure B11 above, Monmouthshire does have extensive unworked resources of Carboniferous Limestone, together with potential resources of sand & gravel along parts of the Usk Valley and elsewhere. Most of those resources, however, fall primarily within areas of relatively low environmental capacity and much of the limestone lies beneath the water table within a principal aquifer. Both of these factors would need to be taken into consideration.

Where different apportionments are agreed, these will need to be set out in a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

### **Use of alternative aggregates**

Marine sand from the Severn Estuary, including the Bedwin Sands, is landed at three wharves in neighbouring Newport. The whole of the county lies within a maximum radius 30 miles from one or more of these wharves and is reliant upon this material. This is despite the existence of extensive potential land-based resources, particularly within the Usk Valley, as indicated on BGS resource maps and in reconnaissance-level mapping carried out for the Welsh Government by Symonds Group Ltd. in 2000.

As noted in the original RTS, there are no significant sources of secondary aggregates in the area.

Recycled aggregates are likely to be available to a limited extent within some of the small rural towns but are these are widely dispersed within the predominantly rural area and are not thought likely to contribute significantly to the overall pattern of supply.

The residual requirements for primary land-won aggregates in Monmouthshire assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

Limestone and land won sand and gravel is also imported by road from England. These imports are less desirable in terms of the proximity principle, but are beyond the control of the local planning authority.

#### **Safeguarding of primary aggregate resources**

Relevant resources of both crushed rock aggregates and land-based sand & gravel have been safeguarded within the LDP, in accordance with detailed advice based on the use of British Geological Survey mapping, prior to the publication of the BGS safeguarding maps.

#### **Safeguarding of wharves and railheads**

All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## NEATH PORT TALBOT

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.305 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Neath Port Talbot, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 7.636 million tonnes for crushed rock, over 25 years. These compare with existing landbanks of zero for sand & gravel and 16.48 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016). These figures exclude any limestone reserves which are allocated for non-aggregate use.

### **Allocations required to be identified in the Local Development Plan**

In view of the surplus of existing permitted crushed rock reserves, and the lack of sand & gravel production, no further allocations are required to be identified within the LDP. However, consideration should also be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

It should be noted that the apportionment for Neath Port Talbot has been significantly reduced, compared with that given in previous RTS editions, with the deliberate intention of encouraging a more equitable pattern of supply, with future production of crushed rock being supplied from neighbouring Swansea as well as from NPT. In effect, part of Neath Port Talbot's apportionment (for HSA sandstone production) has been transferred to Swansea. In the event that new allocations (or permissions) cannot be made to address the shortfall, and *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, consideration may need to be given to collaborative working with neighbouring LPAs within the same sub-region, such that some or all of the transferred provision is reversed. Any revised arrangements that may be agreed between these authorities would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

### **Use of alternative aggregates**

Neath Port Talbot is reliant, for its supplies of sand, on marine-dredged sources, imported via the three operational wharves at Briton Ferry and Giant's Wharf. This is despite the existence of limited potential land-based resources within its area, as indicated on BGS resource maps and in reconnaissance-level mapping carried out for the Welsh Government by Symonds Group Ltd. in 2000.

There are considerable secondary aggregate resources within Neath Port Talbot, primarily associated with the reprocessing of steel and blast furnace slag from the Port Talbot steelworks. Most of the slag is fully utilised, partially as construction aggregate and partly as a sustainable alternative to cement. Some of the secondary aggregate is transported by sea to Newport for processing and distribution. One of the largest construction and demolition waste recycling facilities in the region is based at Neath.

In addition, and in common with other MPAs within the South Wales coalfield, the overburden and 'waste' associated with opencast coal extraction includes some high PSV sandstone, but these are acknowledged as temporary 'windfalls' rather than permanent supply sources (and in any case are included in the figures for primary, rather than secondary aggregates). Future proposals for opencast coal extraction should, nevertheless, be encouraged to utilise such material in order to offset the need for additional allocations of sandstone (subject to there being satisfactory proposals relating to the restoration of these large-scale sites and to the stockpiling and distribution of the stone).

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

#### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

#### **Safeguarding of wharves and railheads**

All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## NEWPORT

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.434 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Newport, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 10.854 million tonnes for crushed rock, over 25 years. The authority currently has zero existing landbanks of permitted reserves, both for sand & gravel and for crushed rock.

### **Allocations required to be identified in the Local Development Plan**

In view of the lack of any existing permitted reserves within Newport, allocations totalling at least 10.854 million tonnes will need to be identified within the LDP. This contrasts with the zero allocation given in the First Review of the RTS but is less than the recommendations given in the original RTS which, purely on the basis of the 'per capita' approach, required Newport to assess the potential to make a resource allocation of 8 to 8.5 million tonnes over a 15-year period (equivalent to 13 to 14mt over 25 years). The requirement, based on the potential availability of resources within Newport (albeit that these are limited), is specifically for Carboniferous Limestone, although contributions from land won sand & gravel resources might be feasible.

Consideration should also be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

Given the lack of existing operational sites within Newport, the authority will need to seek proposals for new working from industry. In the event that that allocations (or new permissions) cannot be made to address the shortfall then, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, consideration may need to be given to collaborative working with neighbouring LPAs, such that some of the required provision (apportionment) is effectively transferred. If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

Any allocations that may be identified should, as far as possible, be Specific Sites or, failing that, Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

### **Use of alternative aggregates**

Newport is supplied with sand from marine-dredged sources within the Severn Estuary and the Bristol Channel, via up to three separate wharves within the city. This is despite the existence of limited potential land-based resources within its area, as indicated on BGS resource maps (most but not all of which are sterilised by existing built development).

The original RTS recommended that the feasibility of sea borne rock imports, via these wharves, should be explored. Discussions with the wharf operators in 2009 suggested that the scope for landing additional tonnages of crushed rock aggregate here is extremely limited (Cuesta Consulting Ltd., 2009). The operations are geared up for the landing and processing of marine-

dredged sand. Whilst it would be theoretically possible to land crushed rock, there is insufficient space for both operations to co-exist. In the absence of any current land-based sand & gravel operations in South East Wales, the marine sand is vital to the local construction industry and is therefore unlikely to be displaced by crushed rock imports.

In terms of secondary aggregates, the former Llanwern steelworks previously supplied aggregates derived from blast furnace slag on an ongoing basis, but this ceased when the blast furnace closed in July 2001. The same site continued to produce Basic Oxygen Steel (BOS) slag from the stockpiles of this material which have accumulated over many previous decades of steel production, but it is understood that this has now ceased.

The rail sidings at 'Monmouthshire Bank' in Newport were also previously utilised to process spent rail ballast for use as aggregate. However, in March 2009, aggregate production at this site ceased and Network Rail redistributed the remaining stocks to other sites, elsewhere. This site therefore no longer represents a source of supply for Newport.

Recycled aggregates, produced from construction, demolition and excavation wastes, are likely to continue to provide an important contribution to the overall supply pattern for construction aggregates within this predominately urban area.

The residual requirements for primary land-won aggregates assume that these various alternative materials will continue to be utilised and the authority should continue to encourage this.

#### **Safeguarding of primary aggregate resources**

Relevant resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP, in accordance with detailed advice based on the use of British Geological Survey mapping, prior to the publication of the BGS safeguarding maps.

#### **Safeguarding of wharves and railheads**

All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## PEMBROKESHIRE

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil.
- Crushed rock aggregates provision: **0.677 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Pembrokeshire, as calculated in Tables 5.5 and 5.7 of the main document, over the 22-year horizon required for sand & gravel and the 25-year timescale required for crushed rock are zero for land-won sand & gravel and 16.932 million tonnes for crushed rock. These figures compare with existing landbanks (excluding dormant sites) of zero for sand & gravel and 16.72 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

Given that Pembrokeshire currently has no sand & gravel operations, and that its permitted reserves of crushed rock are very close to the total apportionment required, no allocations for either are specifically required to be identified within the LDP at this time. However, consideration should be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

In practice, given the close proximity of Pembrokeshire to the Pembrokeshire Coast National Park, as well as to Ceredigion, and the need to find new sources of sand & gravel outside the National Park, Pembrokeshire should continue to work in collaboration with those authorities in order to support the wider objective of maintaining adequate supplies within the West Wales sub-region as a whole. *Subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, it may also need to collaborate with neighbouring Carmarthenshire. If necessary, the authority may need to increase its share of the combined sub-regional apportionment for sand & gravel, compared with the figures given above and in those circumstances might well need to identify new allocations. This does not apply to the apportionment for crushed rock. If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

Where allocations are required these should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

Given the availability of unworked crushed rock and sand & gravel resources in Pembrokeshire, and the longer-term ambition to reduce quarrying activity within the National Park, there would be merit in identifying new Areas of Search (even if specific allocations are not required) in order to encourage future interest from mineral operators.

### **Treatment of Dormant sites**

One dormant igneous rock quarry exists within Pembrokeshire, as detailed in Table B5, above. The planning authority should assess the likelihood of this site being worked within the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Assessment. Where there is a likelihood of reactivation, and if the site is considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 5.14.19 of Planning Policy Wales, the permitted reserves may be offset against any requirements that may otherwise be identified for allocations for future working.

### **Use of alternative aggregates**

The whole of this area lies within a 30 mile radius of Pembroke Docks, where marine aggregates are landed from dredging in the outer Bristol Channel. The northern part of the area is in closer proximity to land-based sand & gravel sites within the National Park, located to the south-west of Cardigan. The possibility might need to be considered that, as the current permitted reserves at those sites are depleted, marine aggregates may need to provide a greater contribution in future years. For the time being, however, Pembrokeshire should retain a focus on maintaining adequate supplies from terrestrial sources, and all land-based options would need to be thoroughly tested by the Local Plan process before any consideration is given to such a shift in local policy. It should also be recognised that marine sand and gravel cannot always substitute for terrestrial materials in specific end uses.

Slate waste is produced in very small quantities in the northern part of the National Park although the extent to which this has hitherto been utilised as aggregate is understood to be minimal, and the prospects for future utilisation would seem to be equally limited.

Recycled aggregate production from construction, demolition and excavation wastes is likely to be concentrated within the various towns of southern and central Pembrokeshire, outside the National Park.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

### **Safeguarding of wharves and railheads**

All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## PEMBROKESHIRE COAST NATIONAL PARK

### **Apportionment for the future provision of land-won primary aggregates**

Pembrokeshire National Park Authority has been working in collaboration with its neighbouring authorities in West Wales since the previous RTS Review, with a view to reducing the future extent of working within the National Park. Whilst this is expected to continue, the National Park does have extant mineral permissions which make important contributions to the sub-regional supply pattern. The planning authority is therefore required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: **0.118 million tonnes per year** until the end of the Plan period and for 7 years thereafter.
- Crushed rock aggregates provision: **0.259 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for the Pembrokeshire National Park, as calculated in Tables 5.5 and 5.7 of the main document, over the 22-year horizon required for sand & gravel and the 25-year timescale required for crushed rock are 2.6 million tonnes for land-won sand & gravel and 6.470 million tonnes for crushed rock. These figures compare with existing landbanks (excluding dormant sites) of 2.6 million tonnes for sand & gravel and 10.37 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

In view of the surplus of existing permitted reserves for crushed rock and taking note of paragraph 49 of MTAN 1 regarding landbanks within National Parks, no further allocations are required to be identified within the LDP. However, consideration should be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

In practice, given the close proximity of the National Park to both Pembrokeshire and Ceredigion, the authority should continue to work in collaboration with those authorities in order to support the wider objective of maintaining adequate supplies within the West Wales sub-region as a whole. In view of its status as a National Park, it may also need to collaborate with neighbouring Carmarthenshire, in terms of future sand & gravel provision. If changes to apportionments are needed, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

### **Treatment of Dormant sites**

One dormant igneous rock quarry exists within the National Park, as detailed in Table B5, above. The planning authority should assess the likelihood of this site being worked within the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Assessment. Where there is a likelihood of reactivation, and where the site is considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 5.14.19 of Planning Policy Wales, they may be offset against any requirements that may otherwise be identified for allocations for future working in neighbouring Pembrokeshire (outside the National Park).

### **Use of alternative aggregates**

The whole of this area lies within a 30 mile radius of Pembroke Docks, where marine aggregates are landed from dredging in the outer Bristol Channel. The northern part of the area is in closer proximity to land-based sand & gravel sites within the National Park, located to the south-west of Cardigan. The possibility might need to be considered that, as the current permitted reserves at those sites are depleted, marine aggregates may need to provide a greater contribution in future years. For the time being, however, Pembrokeshire should retain a focus on maintaining adequate supplies from terrestrial sources, and all land-based options would need to be thoroughly tested by the Local Plan process before any consideration is given to such a shift in local policy. It should also be recognised that marine sand and gravel cannot always substitute for terrestrial materials in specific end uses.

Slate waste is produced in very small quantities in the northern part of the National Park although the extent to which this has hitherto been utilised as aggregate is understood to be minimal, and the prospects for future utilisation would seem to be equally limited.

Recycled aggregate production from construction, demolition and excavation wastes is likely to be concentrated within the various towns of southern and central Pembrokeshire, outside the National Park.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

### **Safeguarding of wharves and railheads**

All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## POWYS

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **3.519 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Powys, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 87.981 million tonnes for crushed rock, over 25 years. These compare with existing landbanks (excluding dormant sites) of zero for sand & gravel and 139.24 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

In view of the large surplus of existing permitted crushed rock reserves, and the lack of sand & gravel production within Powys, no further allocations are required to be identified within the LDP. However, consideration should also be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

### **Treatment of Dormant sites**

One dormant igneous rock quarry and one suspended permission for sand & gravel extraction exist within Powys, as detailed in Table B5, above. The planning authority should assess the likelihood of each of these sites being worked within the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Assessment. If there is a likelihood of reactivation, and if the site(s) in question are considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 5.14.19 of Planning Policy Wales, they may be offset against any requirements that may otherwise be identified for allocations for future working.

### **Use of alternative aggregates**

Powys is not thought to be a significant user of marine-dredged aggregates, in view of its considerable distance from relevant ports and wharves.

Sources of secondary aggregate within the County are thought to be scarce or absent and, in view of the remote and rural nature of much of the County, there is likely to be only a limited degree of recycled aggregate production from construction, demolition and excavation wastes.

Nevertheless, the residual requirements for primary land-won aggregates assume that alternative materials will continue to be utilised to at least the same extent as in the past, and the authority should continue to encourage this.

### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

**Safeguarding of wharves and railheads**

All existing and potential new railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

**RHONDDA CYNON TAF****Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.753 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

The figures exclude the provision of limestone for non-aggregate use, for which separate consideration may need to be given in the LDP.

**Comparison with existing landbanks**

The total apportionments for Rhondda Cynon Taf, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 18.816 million tonnes for crushed rock, over 25 years. These compare with existing landbanks of zero for sand & gravel and 9.83 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016). These figures exclude any limestone reserves which are allocated for non-aggregate use.

**Allocations required to be identified in the Local Development Plan**

In view of the shortfall of existing crushed rock reserves within RCT, allocations totalling at least 8.986 million tonnes are required to be identified within the LDP. There is already a preferred area for the extension of Craig-yr-Hesg Quarry, amounting to approximately 10 million tonnes. An application to develop that extension was refused in 2019, against officer advice, but may be appealed. That, however, is specifically for HSA Sandstone resources, which would not be able to substitute for any shortage of Carboniferous Limestone. Additional allocations may therefore be required to address this and other factors set out in paragraph B84 above.

In the event that allocations (or new permissions) cannot be made to address the shortfall, consideration may, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, need to be given to collaborative working with neighbouring LPAs within the same sub-region, such that some of the required provision (apportionment) is effectively transferred. If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

Any additional allocations should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

**Use of alternative aggregates**

As with all other parts of south-east Wales, Rhondda Cynon Taf relies, for its supplies of sand, on marine-dredged materials from the Bristol Channel. Although limited potential land-based resources within its area are indicated on BGS resource maps, most of these are sterilised by existing built development.

Considerable quantities of colliery spoil exist at Tower Colliery, Hirwaun, which closed (for a second time, following an earlier workers buy-out), in 2008. This material could potentially be used for low quality fill if there were large contracts nearby, but it would not meet normal aggregate specifications.

No significant amounts of other secondary aggregates are present within RCT but reasonable volumes of construction, demolition and excavation wastes are likely to be widely available for the production of recycled aggregates throughout most of the urbanised parts of the MPA.

In addition, and in common with other MPAs within the South Wales coalfield, the overburden and 'waste' associated with opencast coal extraction includes some high PSV sandstone, but these are acknowledged as temporary 'windfalls' rather than permanent supply sources (and in any case are included in the figures for primary, rather than secondary aggregates). Future proposals for opencast coal extraction should, nevertheless, be encouraged to utilise such material in order to offset the need for additional allocations of sandstone (subject to there being satisfactory proposals relating to the restoration of these large-scale sites and to the stockpiling and distribution of the stone).

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

#### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

#### **Safeguarding of wharves and railheads**

All existing and potential new railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised). In particular, as noted in the original RTS, opportunities for co-using rail facilities, (primarily established for opencast coal), for aggregates should be considered as they arise.

## SWANSEA

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.305 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Swansea, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 7.636 million tonnes for crushed rock, over 25 years. The authority currently has zero existing landbanks of permitted reserves, both for sand & gravel and for crushed rock.

### **Allocations required to be identified in the Local Development Plan**

In view of the lack of any existing permitted reserves within Swansea, allocations totalling at least 7.636 million tonnes will need to be identified within the LDP. This contrasts with the zero allocation given in the First Review of the RTS but is substantially less than the recommendations given in the original RTS which, purely on the basis of the 'per capita' approach, required Swansea to assess the potential to make a resource allocation of 13.1 to 13.9 million tonnes over a 15 year period (equivalent to 21.8 to 23.2 million tonnes over 25 years). The requirement, based on the potential availability of resources, and the concept of replacing some of the output from NPT, is specifically for Carboniferous HSA Sandstone.

Given the lack of existing operational sites within Swansea, the authority will need to seek proposals for new working from industry. In the event that allocations (or new permissions) cannot be made to address the shortfall, consideration may, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, need to be given to collaborative working with neighbouring LPAs within the same sub-region, such that some of the required provision (apportionment) is effectively transferred. If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

Paragraph 49 of MTAN 1 notes that landbanks are not required to be maintained within Areas of Outstanding Natural Beauty. For this reason, no allocations should be identified within the Gower AONB.

### **Use of alternative aggregates**

Swansea imports all of its sand from marine-dredged sources in the Bristol Channel, via wharves in Swansea and in neighbouring Neath Port Talbot. This is despite the existence of potential land-based resources within its area, as indicated on both BGS resource maps and in reconnaissance-level mapping carried out for the Welsh Government by Symonds Group Ltd. in 2000.

Secondary aggregate is also imported (by road) from the Port Talbot steelworks, whilst recycled aggregates from construction, demolition and excavation wastes are likely to be in plentiful supply within the urban areas of Swansea itself.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this. It should also promote and facilitate the maximum use of locally-derived recycled aggregates in order to offset the transportation of both primary and secondary aggregates from other sources.

**Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

**Safeguarding of wharves and railheads**

All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## TORFAEN

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.258 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Torfaen, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 6.441 million tonnes for crushed rock, over 25 years. The authority currently has no existing landbanks of permitted reserves, either for sand & gravel or for crushed rock.

### **Allocations required to be identified in the Local Development Plan**

In view of the lack of any existing permitted reserves within Torfaen, allocations totalling at least 6.441 million tonnes will need to be identified within the LDP. This contrasts with the zero allocation given in the First Review of the RTS but is less than the recommendations given in the original RTS which, purely on the basis of the 'per capita' approach, required Torfaen to assess the potential to make a resource allocation of 5.25 to 5.66 million tonnes over a 15-year period (equivalent to 8.75 to 9.3mt over 25 years). The requirement, based on the potential availability of resources, could be fulfilled either by HSA Sandstone and/or by Carboniferous Limestone, although contributions from land won sand & gravel resources might also be feasible.

The existing allocation for secondary aggregate extraction from the former opencast coal tip at Tir Pentwys was the subject of a recent planning application, dismissed on Appeal in August 2019. That decision, however, related to the impact of the proposed access route on an area of Ancient Woodland, and not to the principle of working the resources themselves, which therefore remain available subject to alternative access being agreed.

Consideration should also be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

Given the lack of existing operational sites within Torfaen, the authority will need to seek proposals for new working from industry. In the event that allocations (or new permissions) cannot be made to address the shortfall, consideration may, *subject to the circumstances and considerations set out in Annex A of the RTS Main Document*, need to be given to collaborative working with neighbouring LPAs, such that some of the required provision (apportionment) is effectively transferred. If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

Any allocations that may be identified should, as far as possible, be Specific Sites or, failing that, Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

### **Use of alternative aggregates**

The whole of Torfaen is within a maximum distance of 17 miles (26km) of the marine aggregate wharves in Newport. As a consequence, the area is reliant on the supply of sand from marine-dredged sources. Limited potential land-based resources within its area are indicated on BGS resource maps, but most of these are either sterilised by existing built development and/or are unlikely to be commercially exploitable because of their limited extent.

Secondary aggregates in the form of overburden material from former opencast coal workings may be available for use as general fill and, in part, as a substitute for primary High Specification Aggregate. The main source, at Tir Pentwys, has been identified as a Preferred Area within the LDP.

Regeneration schemes in this area are likely to produce construction, demolition and excavation wastes which may be suitable for use as aggregates.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this. It should also promote and facilitate the maximum use of locally-derived recycled aggregates in order to offset the transportation of both primary and secondary aggregates from other sources.

#### **Safeguarding of primary aggregate resources**

Relevant resources of both crushed rock aggregates and land-based sand & gravel have been safeguarded within the LDP, in accordance with detailed advice based on the use of British Geological Survey mapping, prior to the publication of the BGS safeguarding maps.

#### **Safeguarding of wharves and railheads**

All existing and potential new railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

## VALE OF GLAMORGAN

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.672 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

The figures exclude the provision of limestone for non-aggregate use, for which separate

### **Comparison with existing landbanks**

The total apportionments for the Vale of Glamorgan, as calculated in Tables 5.5 and 5.7 of the main document are zero for land-won sand & gravel and 16.806 million tonnes for crushed rock, over 25 years. These compare with existing landbanks (excluding dormant sites) of zero for sand & gravel and 18.73 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016), all of which relates to Carboniferous Limestone. However, these figures exclude limestone reserves which are allocated for non-aggregate use.

### **Allocations required to be identified in the Local Development Plan**

In view of the slight surplus of existing permitted crushed rock reserves, and the lack of sand & gravel production within the Vale of Glamorgan, no further allocations are specifically required to be identified within the LDP. However, consideration should also be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

If any adjustments are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A of the RTS Main Document, before any of the constituent LDPs are submitted for Examination.

Any allocations that may be required should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

### **Treatment of Dormant sites**

A total of four dormant limestone quarries exist within the Vale of Glamorgan, as detailed in Table B5, above. The planning authority should assess the likelihood of each of these sites to be worked within the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Assessment. Where there is a likelihood of reactivation, and where the site(s) in question are considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 5.14.19 of Planning Policy Wales, they may be offset against any requirements that may otherwise be identified for allocations for future working.

### **Use of alternative aggregates**

The Vale of Glamorgan is reliant upon supplies of sand from marine-dredged sources, despite the existence of limited potential land-based resources within its area, as indicated on BGS resource maps and in reconnaissance-level mapping carried out for the Welsh Government in 2000. Until 2005, marine aggregates were imported via Barry Docks but are now supplied from other wharves in neighbouring Cardiff.

There are also substantial resources of secondary aggregate in the form of pulverised fuel ash (pfa) and furnace bottom ash (fba) from the Aberthaw power station, although the quantities utilised for aggregate purposes remain small.

Equally, there is likely to be a modest level of recycled aggregate production from construction, demolition and excavation wastes, primarily in the vicinity of the main urban areas and industrial sites.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

#### **Safeguarding of primary aggregate resources**

Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

#### **Safeguarding of wharves and railheads**

All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

This page is intentionally left blank