DRAFT Equality Impact Assessment Corporate Assessment Template



Policy/Strategy/Project/Procedure/Service/Function Title: Active Travel Network	
Мар	
New/Existing/Updating/Amending: Updating	

Who is responsible for developing and implementing the Policy/Strategy/Project/Procedure/Service/Function?					
Name:	Job Title:				
Service Team: Transport Vision, Policy	Service Area: Planning, Transport and				
and Strategy	Environment				
Assessment Date: June 2021					

What are the objectives of the Policy/Strategy/Project/ Procedure/ Service/Function?

The development of an Active Travel Network Map (ATNM) is a requirement of local authorities in order to meet their duty under the Active Travel (Wales) Act 2013.

For the purposes of the Active Travel Act, "active travel" is defined as "walking and cycling as an alternative means to motorised transport for the purpose of making everyday journeys".

The Active Travel (Wales) Act 2013 places a requirement on local authorities in Wales to plan for provision for active travel routes and demonstrate continuous improvement in delivery for active travel. The mechanism through which local authorities are required to plan their active travel routes is the Existing Route Map (ERM), which sets out existing active travel routes, and the Integrated Network Map (INM), which sets out future plans to develop active travel routes. The ERM and the INM must be reviewed and resubmitted to the Welsh Ministers for approval every three years. The Active Travel Network Map (ATNM) combines the ERM and the INM in a single map.

This EqIA updates an assessment undertaken for the Active Travel Integrated Network Map in August 2017.

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.]

Detailed information is available on cycling in Cardiff through the 'Cardiff Bike Life' report, which is undertaken every two years.

The Cardiff Bike Life 2015 report set out demographic data of regular cyclists compared

4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 1

DRAFT Equality Impact Assessment Corporate Assessment Template

to the general population of Cardiff. This showed that women and the over 65s are underrepresented among regular cyclists compared to the population as a whole, however the proportion of cyclists who identify as black or minority ethnic is comparable to the general population.

This under-representation was again reported in the Cardiff Bike 2019 report. Of Cardiff residents;

31% of men cycle at least once a week compared with 14% of women 23% of white people cycle at least once a week compared with 20% of people from ethnic minority groups

12% of people who are disabled cycle at least once a week compared with 26% who are not disabled

Over 65s are also under-represented. Information is not available in the Bike Life report for cycling levels in under 16s, but data from Cardiff Council's travel to school surveys indicates that levels of cycling in children and young people are very low, with far fewer children and young people reporting that they cycle to school than the proportion indicating that they would like to cycle to.

The Bike Life report (2019) also indicates that people from lower socio-economic groups (D and E) are less likely to cycle than those from higher groups (A and B), respectively, 12% and 26% cycle once a week.

Responses to the Ask Cardiff survey also provide an indication of how satisfied people are with active travel related issues, and how these concerns are experienced differently by different groups. The survey includes questions around, for example, the condition of pavements and how safe they feel cycling/walking in Cardiff. In terms of safety, for example, women report feeling less safe than men when walking, cycling and travelling by public transport. Over 50% of respondents were very dissatisfied or fairly dissatisfied with pavement maintenance. Amongst respondents identifying as disabled, the level of satisfaction with pavement maintenance was 27%.

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	Χ		
18 - 65 years	Χ		
Over 65 years	Х		

4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 2
---------	---------	--------	-----------------------------	--------------------------	--------

DRAFT Equality Impact Assessment Corporate Assessment Template

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

Provision for active travel and the accessibility and the quality of walking and cycling infrastructure has a differential impact for everyone, but young and older people in particular.

- Evidence consistently demonstrates that a high proportion of children would like to be able to cycle to school close to 50% of children surveyed by Sustrans in 2010 wanted to cycle to school but only 4% were allowed to do so.
- The Cardiff Bike Life 2015 report shows that the over 65s are underrepresented among regular cyclists compared to the population as a whole. Should this underrepresentation continue, a greater proportion of over 65s will not directly benefit from improvements to the cycling network compared to other age groups. However, it should be noted that among over 65s, 69% would like to see more investment in cycling in Cardiff (Cardiff Bike Life 2015).
- Not taking steps to enhance active travel opportunities may have a negative impact on access to schools and learning opportunities more widely and wellbeing commitments to Cardiff as a great place to grow up. Independent mobility is consistently highlighted as a key concern by children and young people. Active travel provision supports independent mobility for children and young people, groups which have fewer transport choices available to them.
- Without the provision for active travel, there may be negative impact on older people, for example, due to the quality and availability of routes. This may have detrimental impact on the city's Dementia Friendly status and wellbeing commitments to Cardiff as a great place to grow older.
- Supporting active travel also links closely with Council's Wellbeing of Future Generations commitments and obligations, for example, Safe, Confident and Empowered Communities and Cardiff is a great place to grow up, and the Council's commitment to making Cardiff a Child Friendly City, including promoting Child Friendly Streets.

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

A positive differential impact will be delivered through the intervention, improving choice for all age groups. This will be reviewed to ensure that no negative impact results from the intervention.

The approach taken to develop the Integrated Network Map emphasises provision for cyclists of all ages and abilities, including more routes segregated from motor vehicles with sufficient capacity for all users.

3.2 Disability

4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 3
---------	---------	--------	-----------------------------	--------------------------	--------

DRAFT Equality Impact Assessment Corporate Assessment Template

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

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

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

The provision of opportunities for walking and cycling and the quality and accessibility of walking and cycling infrastructure impacts on everyone, but for people with disabilities in particular. The benefits highlighted below may be realised as a result of improving Cardiff's active travel network:

- Enabling children and young people to travel actively has a number of potential
 health benefits for people with disabilities as it has the potential to increase
 levels of physical activity, which has been widely shown to be beneficial for a
 number health conditions and disabilities, particularly promoting good mental
 health. There is an increasing body of evidence which highlights the beneficial
 impact of physical activity for both physical and mental health. Active travel
 provision may also improve the accessibility of green and blue space, which can
 be particularly beneficial, as well as access to other opportunities for physical
 activity.
- Improving facilities for active travel may make travelling by these modes easier for people with disabilities by ensuring that routes and facilities are of a high standard and are compliant with the most recent design guidance.
- Access to health care, which may be of particular importance for people with disabilities, will be enhanced by improving the quality and provision of routes and facilities (e.g. crossing facilities) to ensure that these are fully compliant.
- Failure to deliver these benefits may have implications for meeting wellbeing commitments e.g. Safe, Confident and Empowered Communities.

In relation to cycling specifically, stakeholder feedback through the public consultation has identified concerns about difficulties posed by access barriers and surface quality for disabled cyclists using adapted bikes that were not fully addressed through the Draft INM.

4	.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 4
---	--------	---------	--------	-----------------------------	--------------------------	--------

DRAFT Equality Impact Assessment Corporate Assessment Template

Some disability groups have expressed long standing concerns about the impact of
shared use pedestrian/cycle paths on the perceived safety of disabled people using
those routes, particularly people with visual impairments.

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

A positive differential impact may be delivered through the intervention, improving provision and choice for people with disabilities and their families. This will be reviewed to ensure that no negative impact results from the intervention, ensuring that appropriate design guidance and standards are reflected.

The Draft ATNM has been reviewed and, where necessary, amended, to ensure that existing access barriers and surface quality will be addressed through the proposed schemes to provide access for disabled cyclists.

Locations in the Draft INM where shared use has been identified as a treatment option have been reviewed. Routes in urban areas alongside the carriageway and off road routes where pedestrian or cyclist flows are likely to be high will only be designated as shared use as a "last resort" in accordance with Welsh Government's Active Travel Design Guidance. This assessment will form part of the scheme design process.

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
Transgender People			Х
(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)			

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?

4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 5	
---------	---------	--------	-----------------------------	--------------------------	--------	--

DRAFT Equality Impact Assessment Corporate Assessment Template

At present no differential impact has been identified in respect of this protected characteristic. However, the situation will be reviewed regularly and mitigations identified as required.

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			Χ
Civil Partnership			Χ

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?
At present no differential impact has been identified in respect of this protected characteristic. However, the situation will be reviewed regularly and mitigations identified as required.

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	Χ		
Maternity	Х		

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

The provision of opportunities for walking and cycling and the quality and accessibility of walking and cycling infrastructure impacts on everyone, but for people with additional access requirements in particular. The benefits highlighted below are

4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 6
---------	---------	--------	-----------------------------	--------------------------	--------

DRAFT Equality Impact Assessment Corporate Assessment Template

unlikely to be realised with this intervention:

- Evidence indicates that a higher proportion of women are the parents/guardians/carers with primary/main responsibility for the school run, for example, the UK National Travel Survey 2014 found that more trips to school are made by women than men, with the highest number of trips being made by women aged 30 - 49.
- The intervention may have a positive impact in terms of pregnancy and maternity by identifying and delivering improvements to active travel facilities (e.g. by removing obstacles to enable easier access by prams/buggies) and by helping to make journeys safer. This may enable more pregnant women and women with young children/babies to choose to travel actively to school and other key destinations, helping to maintain active lifestyles and providing a lower cost alternative.
- More broadly, improvements in walking and cycling routes and facilities will enable easier access to health care, child care and social/learning opportunities.

In relation to cycling specifically, the Cardiff Bike Life 2015 report shows that women are underrepresented among regular cyclists compared to the population as a whole. In locations where there is good quality, segregated provision for cycling and high levels of cycling (The Netherlands, Copenhagen) there tend to be more female cyclists than male. It is highly likely, therefore, that the quality of provision for cycling has a greater impact on female cyclists than male. Concerns about safety of cycling may have a particular impact on pregnant women and mothers with young children.

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

A positive differential impact will be delivered through the intervention, improving choice for children/young people and their families. This will be reviewed to ensure that no negative impact results from the intervention.

The approach taken to develop the Network Map emphasises provision for cyclists of all ages and abilities, including more routes segregated from motor vehicles with sufficient capacity for all users.

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	Χ		

4.C.400 Issue	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 7	
---------------	--------	-----------------------------	--------------------------	--------	--

DRAFT Equality Impact Assessment Corporate Assessment Template

Mixed / Multiple Ethnic Groups	Χ	
Asian / Asian British	Χ	
Black / African / Caribbean / Black British	Χ	
Other Ethnic Groups	X	

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

The provision of opportunities for walking and cycling and the quality and accessibility of walking and cycling infrastructure impacts on everyone, but for specific groups in particular. The benefits highlighted below are unlikely to be realised with this intervention:

- Promoting active and healthy travel may have a positive impact on all groups but as evidence suggests that black and minority ethnic groups cycle less it may provide a positive differential impact for these groups in particular. For example, the 2017 Bike Life Cardiff report indicates that 12% of bike riders are from black and minority ethnic groups, down from 16% in 2015. Whilst this is broadly in line with the percentage of Cardiff's population from a non-white background, 16.7% (Stats Wales 2018), low levels of participation in cycling by black and minority ethnic groups is widely reported elsewhere. For example, a TfL study suggests that less than 7% of all cyclists are BMEs (TfL 2011 What are the barriers to cycling amongst ethnic minority groups and people from deprived backgrounds?).
- Participation in physical activity more widely is also often lower in black and minority ethnic groups, so an intervention which increases opportunities for active and healthy travel may again particularly benefits these groups.
- More broadly, improvements in walking and cycling routes and facilities will enable easier access to key services and facilities, including cultural, religious and social/learning opportunities.

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

A positive differential impact may be delivered through the intervention, improving choice for children/young people and their families. This will be reviewed to ensure that no negative impact results from the intervention.

4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 8
---------	---------	--------	-----------------------------	--------------------------	--------

DRAFT Equality Impact Assessment Corporate Assessment Template

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	Χ		
Christian	Χ		
Hindu	Χ		
Humanist	Χ		
Jewish	Х		
Muslim	Х		
Sikh	Χ		
Other	Х		

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

The provision of opportunities for walking and cycling and the quality and accessibility of walking and cycling infrastructure impacts on everyone, but for specific groups in particular. The benefits highlighted below are unlikely to be realised with this intervention:

- Faith schools often have larger catchment areas, with the result that it may be harder for families to access education at these schools. Improving opportunities to walk and cycle will help to provide more choice in the mode of travel for journeys to schools and improve accessibility across school catchments.
- Improving accessibility within communities more widely may also make it easier to access places of worship and faith-based facilities, enhancing community cohesion.

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

A positive differential impact may be delivered through the intervention. This will be reviewed to ensure that no negative impact results from the intervention.

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	Χ		

4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 9
---------	---------	--------	-----------------------------	--------------------------	--------

DRAFT Equality Impact Assessment Corporate Assessment Template

Women	Χ		
-------	---	--	--

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

The provision of opportunities for walking and cycling and the quality and accessibility of walking and cycling infrastructure impacts on everyone, but for specific groups in particular. The benefits highlighted below are unlikely to be realised with this intervention:

- As outlined above (Pregnancy and Maternity), a higher proportion of women are the parents/guardians/carers with primary/main responsibility for the school run and therefore improvements to journeys to school will have a particular benefit for them.
- In addition, there is a significant body of evidence (e.g. Sport Wales, British Heart Foundation) which illustrates the long-term trend of girls and women having lower levels of participation in sport and physical activity. For example, across Wales, 59% of boys and 42% of girls aged 4 to 15 years were active for at least one hour per day in five or more days (BHF 2015).
- In relation to cycling specifically, the Bike Life Cardiff report 'Women: Reducing the gender gap' indicates that there is a ratio of 1:19 female to male bike riders, 70% of women never ride a bike and 31% of women living in Cardiff do not ride a bike but would like to.
- Improving opportunities for regular walking and cycling may make a significant contribution to encouraging healthy and active lifestyles. There is a growing body of evidence which suggests a higher proportion of women in the UK experience poorer health for longer. A Public Health England research September 2018 cites women as experiencing 19.3 years/23% of their lives in poor health compared with 16.2 years/20% for men. Obesity is highlighted as one of the two major risk factors for ill health, alongside smoking.

In relation to cycling specifically, the Cardiff Bike Life report shows that women are underrepresented among regular cyclists compared to the population as a whole. Should this underrepresentation continue, a greater proportion of women will not directly benefit from improvements to the cycling network compared to men. In locations where there is good quality, segregated provision for cycling and high levels of cycling (The Netherlands, Copenhagen) there tend to be more female cyclists than male. It is highly likely, therefore, that the quality of provision for cycling has a greater impact on female cyclists than male.

What action(s)	can you take t	address the	differential impact?
vviiat attibilisi	i cali vou lane l	u auuless liie	ullielelillai lillbact:

A positive differential impact may be delivered through the intervention. This will be

	4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 10	
--	---------	---------	--------	-----------------------------	--------------------------	---------	--

DRAFT Equality Impact Assessment Corporate Assessment Template

reviewed to ensure that no negative impact results from the intervention.

The approach taken to develop the Network Map emphasises provision for cyclists of all ages and abilities, including more routes segregated from motor vehicles with sufficient capacity for all users.

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		Х	
Gay Women/Lesbians		Х	
Heterosexual/Straight		Х	

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?
At present no differential impact has been identified in respect of this protected
characteristic. However, the situation will be reviewed regularly and mitigations
identified as required.

3.10 Socio-economic Duty

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the Socio-economic Duty?

Yes	No	N/A
Χ		

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

There may be a differential impact in terms of socio-economic duty. Walking is a low cost mode of transport and cycling is a relatively low cost mode for short

	4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 11	l
--	---------	---------	--------	-----------------------------	--------------------------	---------	---

DRAFT Equality Impact Assessment Corporate Assessment Template

trips compared with the private car. Providing more opportunities to travel by walking or by bike instead of by car will therefore present a cost saving to private individuals and businesses. This may be of particular importance for lower income households and communities. More broadly, it may have a positive economic impact as a result of effecting a modal shift from car use to walking, cycling and bus use which may help to address congestion and its negative impacts upon business productivity and business to business communications. Increasing walking and cycling in itself is proven to have a positive influence on local economic activity (30% increase in sales).

Evidence suggests that air pollution disproportionately affects deprived communities, so improvements to air quality resulting from increasing the use of active modes of travel may therefore particularly benefit these communities. In Cardiff, residents in some of the most deprived areas of Cardiff are subject to higher levels of air pollution¹. This is described as the 'triple jeopardy' effect: "where air pollution, impaired health and deprivation interactions can strengthen associations and create disproportionate disease burdens between and within communities (inequalities)."²

Children from deprived backgrounds are far more likely to be injured on roads than children from more affluent backgrounds³. This is a long-standing trend, with evidence suggesting that children from the most deprived backgrounds are around three to four times more likely to be involved in a road traffic collision than children in more affluent areas⁴. Improvements to road safety may therefore particularly benefit school age children from deprived backgrounds.

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

A positive differential impact may be delivered through the intervention. This will be reviewed to ensure that no negative impact results from the intervention.

3.11 Welsh Language

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

4.C.400 Issue 1 Nov 11 Process Owner: Rachel Jones Authorised: Rachel Jones Page 12

¹ Equality and Inclusion Strategy 2020 - 2024

² Public Health Wales, 2018

³ ROSPA, 2014

⁴ UCL, 2018

DRAFT Equality Impact Assessment Corporate Assessment Template

Yes	No	N/A
Χ		

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

The provision of opportunities for walking and cycling and the quality and accessibility of walking and cycling infrastructure impacts on everyone, but for specific groups in particular. The benefits highlighted below are unlikely to be realised with this intervention:

- Welsh language schools traditionally often had larger catchment areas and although this trend is changing over time, it may still be harder for families to access education at these schools. Improving opportunities to walk and cycle will help to provide more choice in the mode of travel for journeys to schools and improve accessibility across school catchments.
- Improving accessibility within communities more widely may also make it easier to access cultural facilities and activities which support the enhancement of the Welsh Language.

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

A positive differential impact may be delivered through the intervention. This will be reviewed to ensure that no negative impact results from the intervention.

4. Consultation and Engagement

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

Public engagement was undertaken from 24th November 2020 to 29th January 2021 using the Commonplace engagement tool to invite feedback from members of the public about active travel in Cardiff to inform the development of the ATNM. There were 3,502 respondents to the Commonplace survey who either provided comments or agreements to comments on the platform, and 3,602 comments were received.

4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 13
---------	---------	--------	-----------------------------	--------------------------	---------

DRAFT Equality Impact Assessment Corporate Assessment Template

An Active Travel Network Map Engagement Plan sets out the activities planned to engage stakeholders and the public throughout the 12-week public consultation period and to meet the statutory requirements for public consultation as required by the Active Travel Act.
Active Travel Act.

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

Groups	Actions
Age	Please see specific section
Disability	Please see specific section
Gender Reassignment	Please see specific section
Marriage & Civil	Please see specific section
Partnership	
Pregnancy & Maternity	Please see specific section
Race	Please see specific section
Religion/Belief	Please see specific section
Sex	Please see specific section
Sexual Orientation	Please see specific section
Socio-economic Duty	Please see specific section
Welsh Language	Please see specific section
Generic Over-Arching	Review and identify mitigation as required.
[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 :	Date: 02/07/21
----------------	----------------

4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 14
---------	---------	--------	-----------------------------	--------------------------	---------

DRAFT Equality Impact Assessment Corporate Assessment Template

Designation: Section Leader	
Approved By:	
Designation:	
Service Area:	

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 2536 / 3262 or email equalityteam@cardiff.gov.uk

4 C 400 Issue 1 N	Nov 11 Pro	ocess Owner: Rachel Jones	Authorised: Rachel Jones	Page 15