

## Caerphilly County Borough Council - Integrated Impact Assessment

Appendix 2

This integrated impact assessment (IIA) has been designed to help support the Council in making informed and effective decisions whilst ensuring compliance with a range of relevant legislation, including:

- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Welsh Language (Wales) Measure 2011
- Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010
- Well-being of Future Generations (Wales) Act 2015
- Statutory Consultation v Doctrine of Legitimate Expectation and Gunning Principles

**PLEASE NOTE:** Section 3 *Socio-economic Duty* only needs to be completed if proposals are of a strategic nature or when reviewing previous strategic decisions. See page 6 of the [Preparing for the Commencement of the Socio-economic Duty Welsh Government Guidance](#).

1. Proposal Details			
Lead Officer	Head of Service	Service Area & Department	Date
Victoria Camp	Rhian Kyte	Regeneration	21.05.2021

Is this proposal a... (please tick relevant box)									
Policy	<input type="checkbox"/>	Strategy / Plan	X	Practice	<input type="checkbox"/>	Procedure	<input type="checkbox"/>	Restructure	<input type="checkbox"/>

What is the proposal to be assessed? <i>Provide brief details of the proposal and provide a link to any relevant report or documents.</i>
<p>The proposal is an outline business case for the development of a 20MW solar farm in the South West of the County. The solar farm, if approved, will go a long way to reducing the council's carbon emissions and we hope will deliver some long-term community benefits for the County Borough. Link to <a href="#">Outline Business Case</a> for more details.</p>

## 2. Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011

*(The Public Sector Equality Duty requires the Council to have “due regard” to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between different groups; and foster good relations between different groups). Please note that an individual may have more than one protected characteristic.*

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
<b>Age</b> <i>(people of all ages)</i>	NO		As this is an outline business case the final business case will require a revised IIA once more details are known.
<b>Disability</b> <i>(people with disabilities/ long term conditions)</i>	NO		As this is an outline business case the final business case will require a revised IIA once more details are known.
<b>Gender Reassignment</b> <i>(anybody who’s gender identity or gender expression is different to the sex they were assigned at birth)</i>	NO		As this is an outline business case the final business case will require a revised IIA once more details are known.
<b>Marriage or Civil Partnership</b> <i>(people who are married or in a civil partnership)</i>	NO		As this is an outline business case the final business case will require a revised IIA once more details are known.

<b>Pregnancy and Maternity</b> <i>(women who are pregnant and/or on maternity leave)</i>	<b>NO</b>		<b>As this is an outline business case the final business case will require a revised IIA once more details are known.</b>
<b>Race</b> <i>(people from black, Asian and minority ethnic communities and different racial backgrounds)</i>	<b>NO</b>		<b>As this is an outline business case the final business case will require a revised IIA once more details are known.</b>
<b><u>Protected Characteristics</u></b>	<b>Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?</b>	<b>If there are negative impacts how will these be mitigated?</b>	<b>What evidence has been used to support this view?</b>
<b>Religion or Belief</b> <i>(people with different religions and beliefs including people with no beliefs)</i>	<b>NO</b>		<b>As this is an outline business case the final business case will require a revised IIA once more details are known.</b>

<b>Sex</b> (women and men, girls and boys and those who self-identify their gender)	<b>NO</b>		<b>As this is an outline business case the final business case will require a revised IIA once more details are known.</b>
<b>Sexual Orientation</b> (lesbian, gay, bisexual, heterosexual)	<b>NO</b>		<b>As this is an outline business case the final business case will require a revised IIA once more details are known.</b>

### 3. Socio-economic Duty (Strategic Decisions Only)

*(The Socio-economic Duty gives us an opportunity to do things differently and put tackling inequality genuinely at the heart of key decision making. Socio-economic disadvantage means living on a low income compared to others in Wales, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access basic goods and services)*

**Please consider these additional vulnerable groups and the impact your proposal may or may not have on them:**

- Single parents and vulnerable families
- People with low literacy/numeracy
- Pensioners
- Looked after children
- Homeless people
- Carers
- Armed Forces Community
- Students
- Single adult households
- People misusing substances
- People who have experienced the asylum system
- People of all ages leaving a care setting
- People living in the most deprived areas in Wales (WIMD)
- People involved in the criminal justice system

<u>Socio-economic Disadvantage</u>	<b>Does the proposal have any positive, negative or neutral impacts on the following and how?</b>	<b>If there are negative impacts how will these be mitigated?</b>	<b>What evidence has been used to support this view?</b>
<b>Low Income / Income Poverty</b> <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i>	<b>Yes, potentially positive as some of the community benefits being scoped could include a range of options that would tackle fuel poverty, education and</b>		<b>We have received advise from Welsh Government Energy Service on the types of community benefits schemes, as well as desk</b>

	employment. There might also be a range of measures for people to retrofit their homes for fuel efficiency.		top based research on other renewable schemes. Further details on the specifics of the benefits and measures available will be done with engagement and consultation with the local community prior to FBC.
<b><u>Socio-economic Disadvantage</u></b>	Does the proposal have any positive, negative or neutral impacts on the following and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
<b>Low and/or No Wealth</b> ( <i>enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future</i> )	Yes, potentially positive as some of the community benefits being scoped could include a range of options that would tackle fuel poverty, education and employment. There might also be a range of measures for people to retrofit their homes for fuel efficiency.		We have received advise from Welsh Government Energy Service on the types of community benefits schemes, as well as desk top based research on other renewable schemes. Further details on the specifics of the benefits and measures available will be done with engagement and consultation with the local community prior to FBC.
<b>Material Deprivation</b> ( <i>unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.</i> )	Yes, potentially positive as some of the community benefits being scoped could include a range of options that would tackle fuel poverty and/or access to employment or education		We have received advise from Welsh Government Energy Service on the types of community benefits schemes, as well as desk top based research on other renewable schemes. Further details on the specifics of the benefits and measures

	opportunities in the low carbon sector.		available will be done with engagement and consultation with the local community prior to FBC.
<b>Area Deprivation</b> ( <i>where you live (rural areas), where you work (accessibility of public transport)</i> )	Yes, potentially positive as some of the community benefits being scoped could include a range of options that would tackle fuel poverty and/or access to employment or education opportunities in the low carbon sector.		We have received advise from Welsh Government Energy Service on the types of community benefits schemes, as well as desk top based research on other renewable schemes.
<b>Socio-economic Background</b> ( <i>social class i.e. parents education, employment and income</i> )	Yes, potentially positive as some of the community benefits being scoped could include a range of options that would tackle fuel poverty and/or access to employment or education opportunities in the low carbon sector.		We have received advise from Welsh Government Energy Service on the types of community benefits schemes, as well as desk top based research on other renewable schemes.
<b>Socio-economic Disadvantage</b>			We have received advise from Welsh Government Energy Service

<p><i>(What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged)</i></p>	<p><b>It is hoped that the cumulative effect would be far reaching and positive on people or groups identified within this category however until the specific benefits schemes are determined, with the community, we will be unsure as to the specific impact. More detail to follow with the FBC.</b></p>		<p><b>on the types of community benefits schemes, as well as desk top based research on other renewable schemes.</b></p>
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#### 4. Corporate Plan – Council’s Well-being Objectives

*(How does your proposal deliver against any/all of the Council’s Well-being Objectives? Which in turn support the national well-being goals for Wales as outlined in the Well-being of Future Generations (Wales) Act 2015. Are there any impacts (positive, negative or neutral? If there are negative impacts how have these been mitigated?) [Well-being Objectives](#)*

<p><b>Objective 1</b> - Improve education opportunities for all</p>	<p>It is hoped that through procurement, using the social value TOMS methodology, and by delivering the solar farm ourselves we will be able to secure education opportunities both as part of the construction and ongoing in relation to low carbon education opportunities – site visits, EV demo days, working with local schools as part of the development of the solar farm.</p>
<p><b>Objective 2</b> - Enabling employment</p>	<p>Current estimates from WGES indicate that the development of this solar farm will generate approximately 30 employment opportunities during the life of the farm.</p>
<p><b>Objective 3</b> - Address the availability, condition and sustainability of homes throughout the county borough and provide advice, assistance or support to help improve people’s well-being</p>	<p>There is the potential to include a grant scheme for residents to upgrade their homes to increase the fuel efficiency which will in turn lead to better condition homes.</p>
<p><b>Objective 4</b> - Promote a modern, integrated and sustainable transport system that increases opportunity, promotes prosperity and minimises the adverse impact on the environment</p>	<p>Potential for EV charging points as part of community benefits.</p>
<p><b>Objective 5</b> - Creating a county borough that supports healthy lifestyle in accordance with the Sustainable Development principle with in the Well-being of Future Generations (Wales) Act 2015</p>	<p>Reducing fuel poverty can help improve health and lifestyle.</p>
<p><b>Objective 6</b> - Support citizens to remain independent and improve their well-being</p>	<p>Link to above Obj 5.</p>

#### 4a. Links to any other relevant Council Policy





*(How does your proposal deliver against any other relevant Council Policy?)*




**Commercial & Investment Strategy**  
**Transformation Strategy**  
**Decarbonisation Strategy & Energy Prospectus**

## 5. Well-being of Future Generations (Wales) Act 2015 – The Five Ways of Working (ICLIP)

*(Also known as the sustainable development principles. The Act requires the Council to consider how any proposal improves the economic, social, environmental and cultural well-being of Wales using the five ways of working as a baseline)*

<u>Ways of Working</u>	How have you used the Sustainable Development Principles in forming the proposal?
<p><b>Long Term</b></p> 	<p>This is a 25-35 year long project which will delivery long term community benefits and income for the local authority. We are also hoping that through the construction and development phases we will be able to make some landscape and ecology enhancements which will likewise help demonstrate our commitment to the long term carbon reductions measures, and ensuring our impact on the local landscape is well managed.</p>
<p><b>Prevention</b></p> 	<p><b>This project will enable the Council to make huge inroads towards reducing carbon emissions, which will help prevent the need for more fossil fuel energy in the future.</b></p>
<p><b>Integration</b></p> 	<p><b>Welsh Government targets around low carbon economy, making best use of our natural resources and working alongside our communities are all integral to this project. The consultation and engagement plans are detailed and include heavy lead from the community about the benefits they would like to see arise if this project is delivered.</b></p>
<p><b>Collaboration</b></p> 	<p><b>Collaboration with WGES has been ongoing throughout the project, we will also be working with NRW and CADW as part of design of the site and pre-planning conversations.</b></p>

<p><b>Involvement</b></p> 	<p>This will be considered as part of the communications and engagement plan. As the project progresses we have a detailed communication and engagement strategy in place which aligns with the Consultation and Engagement framework and which details how we intend to collaborate with external stakeholders. Internally we have held regular member briefings and project group meetings engaging with internal departments when required.</p>
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## 6. Well-being of Future Generations (Wales) Act 2015

<u>Well-being Goals</u>	Does the proposal maximise our contribution to the Well-being Goal and how?
<p><b>A Prosperous Wales</b>  <i>An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work</i></p>	<p>This proposal links directly to low carbon society and one in which helps to develop a skilled population as well as generating green employment opportunities.</p>
<p><b>A Resilient Wales</b>  <i>A nation which maintains and enhances a biodiverse natural environment healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for climate change)</i></p>	<p>Engagement with ecologist and landscape architects to ensure biodiversity is not affected or improved.</p>
<p><b>A Healthier Wales</b>  <i>A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood</i></p>	<p>Fuel Poverty</p>

<p><b>A More Equal Wales</b> <i>A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances)</i></p>	<p>Fuel poverty and opportunities for education , employment. Socio economic</p>

<u>Well-being Goals</u>	Does the proposal maximise our contribution to the Well-being Goal and how?
<p><b>A Wales of Cohesive Communities</b>  <i>Attractive, viable, safe and well-connected communities</i></p>	<p>Potential to build community cohesion through consultation and engagement work and the longer-term community benefits. People will hopefully feel they have a stake in local community through this work.</p>
<p><b>A Wales of Vibrant Culture and Thriving Welsh Language</b>  <i>A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation</i></p>	<p>Consultation will be done in dual languages to ensure promotion of Welsh Language. Education and employment opportunities will be made available in the medium of Welsh.</p>
<p><b>A Globally Responsible Wales</b>  <i>A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being</i></p>	<p>Renewable energy commitments</p>

## 7. Welsh Language (Wales) Measure 2011 and Welsh Language Standards

(The Welsh Language Measure 2011 and the Welsh Language Standards require the Council to have 'due regard' for the positive or negative impact a proposal may have on opportunities to use the Welsh language and ensuring the Welsh language is treated no less favourably than the English language) [insert link to WL Commissioners Policy Making Standards Guidance](#)



Requirement	Does the proposal have any positive, negative or neutral impacts on the following and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view? <i>e.g the WESP, TAN20, LDP, Pupil Level Annual School Census</i>
<b>Links with Welsh Government's <a href="#">Cymraeg 2050 Strategy</a> and CCBC's <a href="#">Five Year Welsh Language Strategy 2017-2022 and the Language Profile</a></b>	Neutral		The project will ensure compliance with standards at consultation points and will actively promote opportunities through medium of Welsh.
<b>Compliance with the <a href="#">Welsh Language Standards</a>.</b> <i>Specifically Standards 88 - 93</i>	Neutral		The project will ensure compliance with standards at consultation points and will actively promote opportunities through medium of Welsh.
<b>Opportunities to promote the Welsh language</b> <i>e.g. status, use of Welsh language services, use of Welsh in everyday life in work / community</i>	Neutral		The project will ensure compliance with standards at consultation points and will actively promote opportunities through medium of Welsh.
<b>Opportunities for persons to use the Welsh language</b> <i>e.g. staff, residents and visitors</i>	Neutral		The project will ensure compliance with standards at consultation points and will actively promote opportunities through medium of Welsh.
<b>Treating the Welsh language no less favourably than the English language</b>	Neutral		The project will ensure compliance with standards at consultation

			points and will actively promote opportunities through medium of Welsh.
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**7a. Having considered the impacts above, how has the proposal been developed so that there are positive effects, or increased positive effects on (a) opportunities for persons to use the Welsh language, and b) treating the Welsh language no less favourably than the English language.**

Not relevant at this stage but more information as part of FBC.

## 8. Data and Information

*(What data or other evidence has been used to inform the development of the proposal? Evidence may include the outcome of previous consultations, existing databases, pilot projects, review of customer complaints and compliments and or other service user feedback, national and regional data, academic publications and consultants' reports etc.)*

<b>Data/evidence</b> <i>(Please provide link to report if appropriate)</i>	<b>Key relevant findings</b>	<b>How has the data/evidence informed this proposal?</b>
<p>Advice and data from WG experts on the development of solar farms</p> <p><b>Advice from other local authorities in relation to their own renewable schemes.</b></p> <p><b>Advice from internal colleagues in designing the consultation and engagement framework.</b></p>	<p>What were the key findings? What did the data / evidence used tell you? There were many lessons learned from other previous projects – including time take for procurement, breaking the project down into steps and early engagement. We have also quickly recognised areas where we do not have internal expertise or capacity and have built acquiring this into the project plan.</p>	<p>How has the data / evidence available helped inform the proposal? Did it support the proposal and how? If the data / evidence didn't support the proposal why was this? All the learning has been incorporated into our project plans.</p>

**Were there any gaps identified in the evidence and data used to develop this proposal and how will these gaps be filled?**

*Details of further consultation can be included in Section 9.*

Are there any gaps in the existing data and how will you go about filling these gaps?

No gaps currently identified.

## 9. Consultation

*(In some instances, there is a legal requirement to consult. In others, even where there is no legal obligation, there may be a legitimate expectation from people that a consultation will take place. Where it has been determined that consultation is required, [The Gunning Principles](#) must be adhered to. Consider the [Consultation and Engagement Framework](#). Please note that this may need to be updated as the proposal develops and to strengthen the assessment.*

**Briefly describe any recent or planned consultations paying particular attention to evidencing the Gunning Principles.**

Who was consulted?

**Ward members, cabinet members, community councils and relevant staff. A wider consultation and engagement plan is included as part of the overall project plan and will be implemented should cabinet approval be gained.**

**VC to add plans.**

When were they consulted did the consultation take place at the formative stage and was adequate time given for consultees to consider and respond?

**Engagement has been with project lead on a 4-6 weekly basis throughout the project.**

Was sufficient information provided to consultees to allow them to make an informed decision on the proposal?

**Yes, we believe so, and information was provided in a timely fashion and where it was not possible to provide information owing to sensitive nature of the project we have been clear in explaining this to our key stakeholders.**

What were the key findings?

**Broad support for the project and some additional stakeholders identified eg Commoners Association**

How have the consultation findings been taken into account?



**Yes very much so.**

## 10. Monitoring and Review

<p>How will the implementation and the impact of the proposal be monitored, including implementation of any amendments?</p>	<p>Formative stages and until business case is signed off we will not implement monitoring measures until such time as we have sign off. Impact assessment to be reviewed monthly.</p> <p><b>This will all be monitored by the project group as part of the FBC development which will also include details about how the ongoing community benefits will be monitored once we have clarity on what those will be.</b></p>
<p>What are the practical arrangements for monitoring?</p>	<p>For example, who will put this in place? When will it start?</p> <p><b>Transformation manager regular meetings with project team, head of service and cabinet member.</b></p>
<p>How will the results of the monitoring be used to develop future proposals?</p>	<p><b>All the updates and learning are being shared across the project team and will be incorporated into any further renewable energy projects we might decide to explore.</b></p>
<p>When is the proposal due to be reviewed?</p>	<p><b>Every week until FBC approval.</b></p>
<p>Who is responsible for ensuring this happens?</p>	<p><b>Victoria Camp, Transformation Manager.</b></p>

## 11. Recommendation and Reasoning

<input checked="" type="checkbox"/>	<p>Implement proposal with no amendments</p>
<input type="checkbox"/>	<p>Implement proposal taking account of the mitigating actions outlined</p>
<input type="checkbox"/>	<p>Reject the proposal due to disproportionate impact on equality, poverty and socio-economic disadvantage</p>

Have you contacted relevant officers for advice and guidance?

Yes

No



## 12. Reason(s) for Recommendation

*(Provide below a summary of the Integrated Impact Assessment. This summary should be included in the "Summary of Integrated Impact Assessment" section of the Corporate Report Template. The Integrated Impact Assessment should be published alongside the Report proposal).*

Include here a conclusion to your IIA. What is it telling you? How has the data / evidence used helped you to make the decision for Section 11 above? Mention any significant impacts (positive, negative or neutral) if any negative ones identified, how have they been mitigated to lessen the impact? The summary you provide here will be copied into your report going forward for a decision through the committee process, therefore this section must be concise but informative.

This proposal and the associated community benefits have the opportunity to make significant positive impacts across a number of key areas as identified within this IAA; collaboration, employment, low carbon, education, long term thinking. The challenge will be as we develop the FBC to ensure that those benefits are achievable and aligned to the priorities of both the WG, legislation, corporate priorities and the needs and wants of the community.

## 13. Version Control

*(The IIA should be used in the early stages of the proposal development process. The IIA can be strengthened as time progresses to help shape the proposal. The Version Control section will act as an audit trail to evidence how the IIA has been developed over time)*

Version No.	Author	Brief description of the amendments/update	Revision Date
1	Victoria Camp	Initial draft created with project group	18.02.2021
2	Victoria Camp	Minor amendments and updates made in readiness for Cabinet	21.05.2021

### Integrated Impact Assessment Author

Name:	Victoria Camp
Job Title:	Transformation Manager – Commercial & Investment
Date:	21.05.2021

### Head of Service Approval

Name:	Rhian Kyte
Job Title:	Head of Regeneration & Planning

<b>Signature:</b>	<i>Rue Kytte</i>	<b>Date:</b>	<b>26.05.2021</b>
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