

Blaenau Gwent County Borough Council - Integrated Impact Assessment

All decisions, policy reviews or policy implementation will now require a completed Integrated Impact Assessment.

- Section 1-Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Section 2-Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010
- Section 3-Corporate Plan
- Section 4-Wellbeing of Future Generations (Wales) Act 2015
- Section 5-Welsh Language (Wales) Measure 2011
- Section 6-Children’s Right “The Right Way”
- Section 7-Community Safety
- Section 8 Armed Forces
- Section 9-Data
- Section 10-Consultations Statutory Consultation Doctrine of Legitimate Expectation and Gunning Principles
- Section 11-Monitoring
- Section 12-Decision of proposal

Lead Officer	Head of Service	Service Area & Department	Date
Andrew Parker	Sarah King	Governance & Partnerships, Corporate Services	04/06/24

Briefly outline the proposal indicating what change or decision is to be made, also provide any documentation that may be used to support this.

What is the proposal that needs to be assessed?

The proposed Net Zero 2050 Framework aims to provide a high-level overview of what is needed to achieve Net Zero for Blaenau Gwent as a whole.

One of the key plans to support the framework is the proposed Local Area Energy Plan (LAEP), which covers the future energy system for Blaenau Gwent, as well as significant elements of the housing and transport transitions. The LAEP covers around 70% of Blaenau Gwent's total carbon emissions.

Section 1

Outline how the proposal will impact on any people or groups of people with protected characteristics, please refer to the Equalities Act 2010 (Wales) for further information [Equality Act 2010: guidance - GOV.UK \(www.gov.uk\)](http://www.gov.uk) and the EHRC guidance [The Essential Guide to the Public Sector Equality Duty: EHRC](#)

Briefly outline below if there will be any positive or negative impacts as a result of the proposal being considered.

Protected characteristics	Will the proposal have any positive impacts on those with a protected characteristics?	Will the proposal have any negative impacts on those with a protected characteristics?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
Age (<i>people of all ages</i>)	None	None	
Disability (<i>people with disabilities/ long term conditions</i>)	Potential to combine adaptation for accessibility to buildings and transport with implementing Net Zero measures.	Potential for disadvantage if Net Zero technologies not available that adapted to needs, e.g. accessible ULEV vehicles.	Need/potential for integration of accessibility and Net Zero modifications/support.
Gender Reassignment (<i>anybody who's gender identity or gender expression is</i>	None	None	

<i>different to the sex they were assigned at birth)</i>			
Marriage or Civil Partnership <i>(people who are married or in a civil partnership)</i>	None	None	
Pregnancy and Maternity <i>(women who are pregnant and/or on maternity leave)</i>	None	None	
Race <i>(people from black, Asian and minority ethnic communities and different racial backgrounds)</i>	None	None	
Religion or Belief <i>(people with different religions and beliefs including people with no beliefs)</i>	None	None	
Sex <i>(women and men, girls and boys and those who self-identify their gender)</i>	None	None	

Sexual Orientation <i>(lesbian, gay, bisexual, heterosexual, other)</i>	None	None	
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NOTE: Section 2 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](#).


<p>Section 2 Socio-economic Duty (Strategic Decisions Only) <i>The Welsh Governments Socio-economic Duty provides a framework in order to ensure tackling inequality is at the forefront of decision making.</i></p>			
<p>.Please consider the below vulnerable groups and consider how the proposal could affect them:</p> <ul style="list-style-type: none"> ➢ 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 			
Socio Economic disadvantage definitions.	Will the proposal have a positive, negative or neutral impacts on the below?	How could you mitigate the negative impacts outlined?	Please highlight any evidence that has been considered.
Low Income / Income Poverty <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i>	Transition to zero carbon home heating and transport has the potential to lower bills for those struggling with costs as electricity more energy efficient than fossil fuel. However, the	Documents highlight the importance of providing trusted information about options for transition and developing support that fits with needs of	See LAEP Technical Report





	<p>upfront costs of these technologies can be a significant barrier to adoption, along with other non-financial barriers, such as awareness of these options.</p>	<p>specific Blaenau Gwent residents.</p>	
<p>Low and/or No Wealth (<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>)</p>	<p>As above the upfront costs of new heating systems or ULEV cars barrier to adoption and potential cost savings.</p>	<p>Support for residents with upfront costs of improvements, schemes of this type, such as current Ecoflex for home energy, are likely to require regional or national funding.</p>	<p>See LAEP Technical Report</p>
<p>Material Deprivation (<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>)</p>	<p>Retrofit programme has potential to lead to warm homes for those with current poor energy efficiency.</p>		<p>See LAEP Technical Report</p>

<p>Area Deprivation <i>(where you live (rural areas), where you work (accessibility of public transport) Impact on the environment?)</i></p>	<p>Net Zero transport options will vary dependent on areas including topography and population density as well as proximity to jobs and services. Impacts could be positive or negative dependent on options chosen.</p>	<p>Plan identifies that there are potential significant geographical variations between areas in terms of transport options, housing type and related retrofit needs and seeks to understand these further.</p>	<p>See LAEP Technical Report</p>
<p>Socio-economic Background <i>(social class i.e. parents education, employment and income)</i></p>	<p>As above</p>		
<p>Socio-economic Disadvantage <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>Potential for positive or negative impacts dependent on how transitions develop. Transition could reduce existing disadvantages by prioritising Net Zero actions that also address these well-being issues. However, also potential for exacerbating these differences if early adopters are largely those</p>	<p>Combination of targeted support for those with greatest need and also having good understanding of these needs and how Net Zero can help address.</p>	<p>See LAEP Technical Report</p>

	<p>who able to pay for Net Zero technology.</p>		
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<p>Section 3-Corporate Plan <i>Please outline any Corporate Plan linkages of the proposal -BG Corporate Plan 22-27</i></p>	
<p>Priority 1 - Maximise learning and skills for all to create a prosperous, thriving, resilient Blaenau Gwent</p>	<p>Retrofit is the largest element of Blaenau Gwent transition to Net Zero, providing significant opportunities for local business and job creation.</p>
<p>Priority 2 - Respond to the nature and climate crisis and enable connected communities</p>	<p>Net Zero 2050 Framework provides overview of Blaenau Gwent journey to Net Zero. LAEP is a key document within this covering around 70% of Blaenau Gwent’s territorial carbon emissions.</p>
<p>Priority 3 - An ambitious and innovative council delivering quality services at the right time and in the right place</p>	<p>The research and innovation proposition in LAEP fits with council ambition for this priority.</p>
<p>Priority 4 - Empowering and supporting communities to be safe, independent and resilient</p>	<p>Promoting community benefits from renewables and improving energy resilience for homes and businesses.</p>

Section 4-Well-being of Future Generations (Wales) Act 2015 – The Five Ways of Working (ICLIP)	
<i>Sustainable development principles. The WCFG 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)</i>	
Five Ways of Working	How have you used the Sustainable Development Principles in forming the proposal?
<p>Long Tern</p> 	<p>Consider the long-term impact of the proposal on the ability of communities to secure their well-being.</p> <p>Framework and LAEP have long term focus on 2050 to address climate emergency.</p>

<p>Prevention</p> 	<p>Consider how the proposal is preventing problems from occurring or getting worse</p> <p>Focus on identifying changes needed to avoid carbon lock in and ensure that infrastructure in place to achieve Net Zero.</p>
<p>Integration</p> 	<p>Consider how your proposal will impact on other services provided in our communities (these might be Council services or services delivered by other organisations or groups)</p> <p>Framework based on linking decarbonisation with other well-being goals delivered by range of council services, rather than treating decarbonisation as stand alone objective.</p>
<p>Collaboration</p> 	<p>Consider how you are working with Council services or services delivered by other organisations or groups in our communities.</p> <p>LAEP identifies actions for range of partners including at regional and national level needed to deliver Net Zero 2050. LAEPs developed with common regional model and will inform National Energy Plan.</p>
<p>Involvement</p> 	<p>Consider how you involve people who have an interest in this proposal and ensure that they represent the diversity of our communities.</p> <p>Framework themes informed by views of Blaenau Gwent Climate Assembly. Continuing to engage public on specific areas of work being developed, e.g. public EV charging trials.</p>

How does your proposal link to the Welsh Governments Priorities for Wales? Please indicate below.

1. **A PROSPEROUS WALES** ... 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.

Retrofit is both a significant challenge and opportunity for Blaenau Gwent. The skills and supply chain requirements of retrofit at the scale required by Net Zero 2050 are far beyond current capacities both locally and nationally. However, they also present large-scale opportunities for jobs and businesses, many of which will have to be located in Blaenau Gwent, and there is significant potential for these benefits to be retained in local businesses and communities.

The right training and support are important to ensure the quality of retrofit work required and that local providers can raise awareness and provide accurate advice to residents. There are potential opportunities to do this by building on retrofit capacity that is already developing locally.

2. **A RESILIENT WALES ...** a nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change). Think about how your activity will have regard to protecting and enhancing biodiversity.

Nature based solutions have real and substantial climate benefits, but in terms of overall impact there are greater benefits in improving biodiversity, creating attractive neighbourhoods and to health & well-being. The Blaenau Gwent Climate Assembly highlighted that many residents see these types of improvements to the quality of the local natural and built environment as essential elements of the wider transition to Net Zero. Both in demonstrating commitment to, and the credibility of, the larger-scale changes needed to reach Net Zero and for their own sake in improving local quality of life.

3. **A HEALTHIER WALES ...** 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.

Both the nature and housing themes have potentially significant benefits to both mental and physical health, from improving quality and access to natural spaces and improving comfort and quality of housing.

4. **A MORE EQUAL WALES ...** A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).

A Just Transition is about answering the question posed to the Blaenau Gwent Climate Assembly, 'how can we tackle climate change in Blaenau Gwent in a way that is fair and improves living standards for everyone?' Some clear expectations about a Just Transition emerged from the Assembly. Most people were keen to 'think global' and tackle the climate emergency, but on the condition that we 'act local' and demonstrate commitment and action on the quality and safety of the local natural and built environment.

Most people do not experience the climate crisis as a crisis of over consumption, but as part of a wider crisis of quality of life and work opportunities. In the context of precarious personal circumstances people are often unable to afford, and/or unwilling to risk, making the type of large-scale transitions implied by Net Zero 2050, even though they can often see the potential long-term benefits of these transitions. A just transition is about making sure that the Net Zero transition addresses wider well-being, not just carbon reduction, and that everybody gets the opportunity to benefit from this transition.

5. **A WALES OF COHESIVE COMMUNITIES** ... attractive, viable, safe and well-connected communities.

Transport issues around high car dependence and low car ownership restrict people ability to access jobs and services. Decarbonising transport system is also an opportunity to improve transport links and connections between communities.

6. **A WALES OF VIBRANT CULTURE AND THRIVING** ... 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.

Not Applicable

7. **A GLOBALLY RESPONSIBLE WALES** ... 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.

Net Zero 2050 goal is about Blaenau Gwent making a fair contribution to carbon reductions, based on our population size, the UK's Paris Agreement commitments and historical emissions, tackling the Climate Emergency and achieving global targets for limiting global warming to well below 2°C



Section 5-Welsh Language (Wales) Measure 2011 and Welsh Language Standards			
<p><i>(The Welsh Language Measure 2011 and the Welsh Language Standards require the Council to have 'due regard' for the positive or negative impact that any proposal may have on opportunities to use the Welsh language. Welsh Language Standards)</i></p>			
Requirement	Does the proposal have any positive, negative or neutral impacts in regards to the below?	What can be done to mitigate any negative impacts?	Please demonstrate any evidence used to form this opinion.
<p>Compliance with the Welsh Language Standards. <i>Specifically Standards 88 - 93</i></p>	None		
<p>What opportunities are there to promote the Welsh Language? <i>e.g. status, use of Welsh language services, use of Welsh in everyday life in work / community</i></p>	None		
<p>What opportunities are there for a person or person to use the Welsh Language? <i>e.g. staff, residents and visitors</i></p>	None		
<p>Has the Welsh Language been considered in order to treat the Welsh language no less favourably than the English language?</p>	None		

Section 6 – Children’s Rights Approach - [The Right Way](#)

The Children’s Rights Approach – The Right Way is a framework for working with children, grounded in the UN Convention on the Rights of the Child (UNCRC). It places the UNCRC at the core of planning and service delivery and integrates children’s rights into every aspect of decision-making, policy and practice. The Right Way focuses on three main them Participation, Provision and Protection.

Protected characteristics	Will the proposal have any positive impacts on the Children’s Rights Approach?	Will the proposal have any negative impacts on the Children’s Rights Approach?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
Participation (child or young person as someone who actively contributes to society as a citizen)	None	None	
Provision (the basic rights of children and young people to survive and develop)	None	None	
Protection (children and young people are protected against exploitation, abuse or discrimination)	None	None	

Section 7– Community Safety

Duty to Consider Crime and Disorder Implications

Section 17 of the Crime and Disorder Act 1998 places a duty on the local authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder, anti-social and other behaviour adversely affecting the local environment, the misuse of drugs, alcohol and other substances, re-offending and serious violence.

Impacts	Will the proposal have any positive impacts on crime and disorder?	Will the proposal have any negative impacts on crime and disorder?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
Crime (consider impact on each: victims, offenders and neighbourhoods)	None	None	
Anti-Social Behaviour and behaviour adversely affecting the local environment (consider impact on each: victims, offenders, neighbourhoods and green spaces)	None	None	
Misuse of drugs, alcohol and other substances	None	None	

(Think vulnerable children, adults, families and communities)			
Re-offending (Think young people and adults, victims, families, communities)	None	None	
Serious Violence (Think vulnerable young people, vulnerable adults, victims, families, communities)	None	None	
Counter Terrorism (People and places that are vulnerable to terrorism or violent extremism)	None	None	
Community Cohesion (Asylum seekers, Migrants, Victims or Hate Crime, Community tensions)	None	None	

Section 8- Armed Forces Covenant Duty [AFC Draft Statutory Guidance - Final.pdf](#)

Impacts	Will the proposal have any positive impacts on the armed forces community?	Will the proposal have any negative impacts on the armed forces community?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
<p>Health</p> <ul style="list-style-type: none"> • Provision of services • Planning and funding • Co-operation between bodies and professionals <p>These healthcare functions are within scope of the Duty in the following settings:</p> <ul style="list-style-type: none"> • NHS Primary Care services, including general practice, community pharmacies, NHS dental, NHS optometry services and public health screening services. • NHS Secondary Care services, including urgent 	None	None	

<p>and emergency care, hospital and community services, specialist care, mental health services, and additional needs services (as applicable).</p> <ul style="list-style-type: none"> • Local authority-delivered healthcare services, including sexual health services and drug and alcohol misuse services 			
<p>Education</p> <ul style="list-style-type: none"> • Admissions • Educational attainment and curriculum • Child wellbeing • Transport • Attendance • Additional needs support • Use of Service Pupil Premium funding (England only) <p>These education functions are within scope of the Duty in compulsory education settings, that is, primary, secondary, and, for England only, compulsory further</p>	None	None	

education. The Duty does not cover nursery (early years education), higher education, or other voluntary adult education settings			
Housing <ul style="list-style-type: none"> • Allocations policy for social housing • Tenancy strategies (England only) • Homelessness • Disabled Facilities Grants 	None	None	

Section 9-Data-Please outline any data or evidence that has been used to develop the proposal, this can be previous consultations, local/national data, pilot projects, reports, feedback from clients etc.		
Data/evidence –What data/evidence was used? - provide any links.	What were the key findings?	How has the data/evidence informed this proposal?
The LAEP is modelling is based on both data about current energy use in Blaenau Gwent and national data sets about a range of areas including housing, transport and energy generation. Details of the modelling can be found in the LAEP technical report.	There are two main models within the LAEP: <ul style="list-style-type: none"> • Future energy scenarios modelling identifies possible ways to achieve Net 	The figures in these models are projections of different scenarios for how Net Zero 2050 might be achieved. They are not recommendations or targets either for us as an organisation or for Blaenau Gwent as an area. Rather, they provide a general

	<p>Zero 2050, based on optimising the financial cost and carbon costs.</p> <ul style="list-style-type: none"> • Deployment modelling attempts to identify where there is most potential to act in the short to medium term based on factors such as available grid capacity. 	<p>overview of the challenges for Blaenau Gwent in achieving a Net Zero energy system and a useful indication of the size and direction of the changes needed.</p>
<p>Are there any data or information gaps and if so what are they and how do you intend to address them?</p>		
<p>Significant further work will be required in this area. Both further developing data sets and more detailed models of specific areas of energy system to inform action. The level of detail in a LAEP is equivalent to an outline design or masterplan and is intended to identify core areas that require focus over the next 25 years. It proposes future sector-specific action plan that sets out how each part of the area will be designed and built. Additional detailed design work will be required for identified specific actions, projects and programmes to progress to implementation.</p>		

Section 10-Consultation. Please provide details of consultation undertaken to support the proposal. Please consider the Gunning Principles: -

Principle 1: Consultation must take place when the proposals are still at a formative stage. You must not have already made up your mind.

Principle 2: Sufficient reasons must be put forward to allow for intelligent consideration and response. Have people been given the information and opportunity to influence?

Principle 3: Adequate time must be given for consideration and response. Is the consultation long enough bearing in mind the circumstances?

Principle 4: The product of consultation must be conscientiously taken into account when finalising the decision

Briefly describe any planned consultations or consultations that have been carried out to date. Please consider the above principles.

Please consider the following questions; -


- 1. Who did you consult?**
- 2. When did the consultation take place and was adequate time given for a response?**
- 3. Was there enough information provided to respond effectively?**
- 4. What were the findings?**
- 5. Have the findings been considered in regards to the decision?**

In March 2021 44 residents of Blaenau Gwent got together online to discuss the question 'how can we tackle climate change in Blaenau Gwent in a way that is fair and improves living standards for everyone?' The 44 Assembly Members were chosen at random to be representative of people in Blaenau Gwent (in terms of age, gender, where they live, type of housing etc.) The Assembly was organised by the four Registered Social Landlords in Blaenau Gwent (Linc, Melin Homes, Tai Calon and United Welsh) with Cynnal Cymru and funding from Welsh Government. The Climate Assembly met for a total of 23 hours online, hearing evidence from over 20 experts (from academics to local residents), and voted on recommendations they created themselves, five of which received the 80% support needed to become official recommendations. The Blaenau Gwent Climate Assembly informed the four themes identified in the Net Zero 2050 Framework.

Section 11-Monitoring and Review	
How will the implementation of the proposal be monitored, including the impacts or changes made?	Review of action identified in Appendix 3
What monitoring tools will be used?	CCR developing indicators for LAEP.
How will the results be used for future development?	Results will inform development of specific actions to deliver Net Zero transition
How and when will it be reviewed?	Via Annual Net Zero Report
Who is responsible for ensuring this happens?	BGCBC Climate Group

Section 12 - Decision		
<i>Using the information you have gathered from sections 1-9 please state in the table below whether you are able to proceed with the proposal.</i>		
Continue with the proposal in its current form	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Continue with proposal but take into account reasonable steps to mitigate any negative impacts of the proposal	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Name of person completing the IIA	
Name:	Daniel Wheelock
Job Title:	Policy Officer
Date:	May/June 2024

Head of Service Approval			
Name:	Sarah King		
Job Title:	Head of Governance and Partnerships		
Signature:		Date:	04/06/2024

Please contact Policy & Partnerships should you require any further advice or guidance on completing your assessment via lissa.friel@blaenau-gwent.gov.uk or kate.james@blaenau-gwent.gov.uk