

## Business Case

Title	SAB Design Engineer Post
Date	30 <sup>th</sup> January 2024
Lead Officer(s)	Carwyn Morris
Service Area	Engineering & Highways

### Staffing Arrangements Related to Changes in this Business Case

*Include number of staff, job titles etc. Please identify agency, fixed term and grant funded posts.*

The current Sustainable drainage systems (SuDS) Approval Body (SAB team) currently consists of two staff members, one Senior SAB Engineer who is also the Senior Flood Risk Engineer and Land Drainage officer for the authority. The other member of the team is a Technical SAB Admin who deals with processing all applications, invoicing and carrying out site inspections on developments that the Council will be adopting. Both posts are permanent, and core funded.

In addition, the Engineering department has one SuDS Design Engineer to undertake all SuDS design work for Blaenau Gwent CBC, private developers and all Council schemes for Engineering and other Council departments. The post brings in income and is permanent, however, the post is not core funded. The post has been funded via the Welsh Government's Flood Risk Management revenue grant.

### Change/Staff Reduction Efficiency Proposal

*Provide details of the proposal, this should include any relevant data. In this section, please consider the Wellbeing five ways of working together with the effectiveness, efficiency and economic aspects of the proposal.*

**Are there any HR implications?** Yes  No

*If yes, please explain below.*

Admin support for recruitment of the new post.

**Are there any Procurement implications?** Yes  No

*If yes, please explain below.*

**Are there any statutory implications?** Yes  No

*If yes, please explain below.*

**Are there any legal implications?** Yes  No

*If yes, please explain below.*

## Integrated Impact Assessment (Summary)

Information for this summary is to be taken from the Integrated Impact Assessment in Appendix 1.

	Positive Impacts	Negative Impacts	Neutral
1. Merthyr Tydfil Well-being Objectives	1 of 4	0 of 4	3 of 4
2. Sustainable Development Principles	5 of 5	0 of 5	0 of 5
3. Protected Characteristics (including Welsh Language)	0 of 10	0 of 10	10 of 10
4. Socio-economic Disadvantage	0 of 6	0 of 6	6 of 6
5. Decarbonisation	1 of 6	0 of 6	5 of 6
6. Biodiversity and the resilience of Ecosystems	<b>Maintained</b>	<b>Enhanced</b>	<b>Reduced</b>
	0 of 1	1 of 1	0 of 1
7. Consultation and Engagement	<b>Undertaken</b>	<b>Due to be Undertaken</b>	<b>Not Required</b>
	0 of 1	0 of 1	1 of 1
8. Data and Evidence	<b>Yes</b>		<b>No</b>
	1 of 1		0 of 1
<b>Summary</b>			
<b>The main positive impacts are:</b>	<ul style="list-style-type: none"> <li>The well-being objectives can be met as Schedule 3 of the Flood and Water Management Act 2010 will ensure sustainable drainage systems (SuDS) are implemented in Merthyr Tydfil. As well as reducing flood risk, these SuDS will enhance the local environment and provide multiple benefits i.e. water quality, amenity and biodiversity. Such enhancements will improve flood resilience to local communities and businesses and provide a richer landscape in which local economies can thrive.</li> <li>The statutory duty ensures long term benefits as the provision of SuDS is mandatory for new developments. Close working arrangements with internal and external partners is an essential component of the SuDS approval process. External partners include NRW, Welsh Water, other local authorities and developers.</li> <li>Biodiversity will be enhanced due to the creation of green spaces and habitat for wildlife within Merthyr Tydfil as SuDs aim to mimic natural drainage regimes. SuDs achieve this by lowering flow rates, increasing water storage capacity and reducing the transport of pollution to the water environment.</li> </ul>		
<b>The main negative impacts are:</b>	None.		

## Options: Provide information and data regarding the proposal(s).

### Option 1

#### Option 1 Description

Does this mean that the level of service is reduced? Yes  No

Is this option directly relating to a reduction in a statutory service? Yes  No

Can further reductions take place without the Council failing to meet its statutory duty(ies)? Yes  No

This business case presents an invest to save proposal for the SAB design and approval service through the creation of a new Grade 8 SuDS Design Engineer post within the Engineering Drainage section. The post will support the current SAB team with their statutory duties together with carrying out additional private design work to generate income.

#### SAB Approval Process

##### SAB Applications

On the 7<sup>th</sup> January 2019 Welsh Government implemented Schedule 3 of the Flood and Water Management Act 2010 that requires surface water drainage for new developments to comply with mandatory National Standards for Sustainable Drainage systems (SuDs). The implementation of Schedule 3 requires all SuDs systems to be approved by a statutory SuDs Approving Body (SAB). All developments with a construction area greater than 100m<sup>2</sup> or any development with drainage implications require SAB approval.

Provided the National Standards are met, the SAB is also required to adopt and maintain the approved SuDS that serve more than one property resulting in the need to secure bonds, fees and service charges for ongoing maintenance by MTCBC. Adoption by the SAB is via bespoke legal agreements and the SAB requires payment of a commuted sum which is reflective of the maintenance or replacement cost for the lifetime of the development.

Furthermore, all new SuDs schemes need to be inspected by the SAB during construction to ensure they are built to the appropriate standard with the specified materials, and once in operation, to ensure they are properly maintained by MTCBC and not damaged or removed.

Due to the legislation still being relatively new, many developers are still unaware of the legal requirements or are choosing to ignore the legislation resulting in a significant difference between the number of 'SAB eligible' planning applications and SAB applications being received. To prevent any further illegal development within the borough we are now collaborating with both Planning and Building Control to gather information on every 'SAB eligible' planning application that is submitted. We will then send letters to these applicants informing them of the requirement for SAB approval and develop a register to continually monitor any unauthorised development. It is therefore anticipated that the number of SAB applications will increase significantly moving forward resulting in additional workload for the only Senior SAB Engineer.

The below table provides the comparison between the number of 'SAB eligible' planning applications and SAB applications that have been received since 2019. Although, it must be noted that some developers may decide not to build immediately upon receiving planning approval and choose to submit a SAB application within the 5 year period of the planning approval becoming void. However, taking into account this scenario there is still a significant difference in numbers.

Year	SAB Applications	Planning Applications
2019	5	146
2020	15	124
2021	22	169
2022	13	121
2023	16	-

### Pre-Application Advice

Developers are also encouraged to submit a SAB pre-application and we have seen a slow increase in the number being received as shown in the below table. While fees for full SAB applications are set by Welsh Government ranging between £420 - £7500 per application depending on the size of the development. The fees for pre-applications are determined by us and we have recently increased our fee to 50% of a full application fee due to the amount of officer time that is required to provide a formal written response. It is therefore anticipated that further income will be generated as a result of this change.

Year	Pre-Applications
2019	1
2020	5
2021	7
2022	7
2023	10

### Site Inspections

The predicted increase in the number SAB applications will inevitably increase the amount of site inspections that are required specifically on developments where MTCBC must adopt and maintain the drainage systems for the lifetime of the properties. The number of inspections is decided by the Senior SAB Engineer and is dependent on the type and number of SuDs systems being installed. The proposed new post will provide essential assistance in carrying out site inspections that are also chargeable at £168 per inspection. Since May 2022 we have received £13,272 income from site inspections as shown below.

Year	Income
May 22 – Apr 23	£7,392
May 23 – Dec 23	£5,880

## Financial Information

As mentioned above it is anticipated that we will see a significant increase in workload and income moving forward. However, if we continue the SAB approval process with only one SAB Engineer and one SAB Admin post we will be unable to meet our statutory duties and meet the future demands.

Since the SAB was established in 2019 the amount of income generated each year from full applications, pre-applications and site inspections is shown in the below table. The last column indicates the amount of potential income that could have been received since 2019 due to the number of 'SAB eligible' planning applications permitted (with the caveat highlighted above that applications have 5 years to implement their Planning permission and as such the income may not all be received in one year). However, moving forward we expect to see the level of income closer to these figures.

<b>Year</b>	<b>Actual Total Income</b>	<b>Potential Income</b>
2019	£2,195	£134,904
2020	£10,305	£114,576
2021	£9,933	£156,156
2022	£8,771	£111,804
2023	£17,866	-

The above 'Potential Income' is based on the below assumptions:

- Minimum fee of £420 per full application, (likely to be higher as it depends on the size of the development where a maximum of £7,500 can be charged).
- Minimum of 3 site inspections per application charged at £168 each, (a larger development will require more inspections and could be up to 200).
- Pre-application fee not included as it is not mandatory.

Below are two examples of how costs can vary per development thereby making it difficult to accurately assess potential income.

Example One: Single plot 101m<sup>2</sup> - Pre-application fee = £220, Full application fee = £420, Site inspections x 3 at £168 = £504. Total income = £1,144

Example Two: 120 plot development – Pre-application fee = £865, Full application fee = £1,730, Site inspections x 140 at £168 = £23,520. Total income = £26,115

## Collaboration with other Local Authorities

Opportunities are being explored to take on the SAB approval process for other local authorities potentially within the next few months. If this progresses we will receive all income in relation to their SAB applications, pre-applications, fees for attending meetings and negotiating commuted sums on their behalf.

If we are unable to create this additional SAB post then we will not have the capacity to accept any future opportunity and will lose out on potential income.

## SuDS Design Work

In addition to the SAB approval process and in relation to carrying out design work both for council schemes and private clients, we have a qualified and experienced SuDS design engineer who undertakes SuDS designs using specialist technical software and has an understanding of landscaping design which is often incorporated into SuDS schemes.

Blaenau Gwent CBC do not have a SuDs Approval Body (SAB) or a SuDS Design Engineer and therefore requested that we undertake their SuDS design work. Since 2021 we have been designing their schemes and submitting SAB applications and SAB pre-applications on their behalf to Caerphilly CBC who are fulfilling their statutory duties in relation to the SAB approval process. Since 2021 we have generated £42,303 income through work for Blaenau Gwent CBC and they continue to provide us with projects due to our rates being less than external consultants.

We do not currently advertise our SuDS design service, however, we are currently turning down other requests from small developers and local architects to design SuDS schemes for their developments. If this new post was created we would be able to accept more private work and increase income. We would also advertise our design service thereby creating further opportunities.

To date we have only accepted four private requests for very small developments and this generated income of £13,067. Just to note all private design work is covered within the Council's insurance.

### Benefits of this option

- Increased income.
- Creating more resilience within the team to deal with all SAB, drainage and flood risk issues.
- Increased capacity to carry out work for other departments such as Property Services where we have turned down work resulting in them appointing external consultants at a higher cost.
- Opportunities to establish long term clients.
- Opportunity to establish ourselves as a local consultancy design service.

### Consequences of this option

- If we receive too many job requests we might not have enough resource to undertake the work.

## Risks

### Negative (Threat) Risks *(Please only complete the first three columns, CMT will complete the risk scores)*

Risk Description	Impact Description	Risk Category	CMT Assessment of Risk		
			Impact	Likelihood	Score (Impact X Likelihood)
If we don't receive enough private work to generate the income required	Unable to make the predicted £50k savings	Financial	4	3	12
If we receive too many job requests we might not have enough resource and will have to refuse work and lose income	Loss of potential clients	Resource	3	3	9

### Positive (Opportunity) Risks *(Please only complete the first three columns, CMT will complete the risk scores)*

Risk Description	Impact Description	Risk Category	CMT Assessment of Risk		
			Impact	Likelihood	Score (Impact X Likelihood)
Increased income	Greater income for the Council	Financial	3	4	12
Long term private clients	Building good relations with stakeholders – continuous work	Financial	3	3	9

### Potential total saving *(to be completed with or by the accountancy team)*

	Year 1	Year 2	Year 3	Year 4
<b>Costs (Uplifts etc.)</b>	<b>£57,154</b>	<b>£59,918</b>	<b>£62,827</b>	<b>£65,822</b>
<b>Savings</b>	<b>£50,000</b>	<b>£50,000</b>	<b>£50,000</b>	<b>£50,000</b>
<b>Other</b>				

Rationale (Accept, Reject, Shortlist) (Please note shortlisting is only relevant if a do maximum option is included)

<u>Accept</u>	<input checked="" type="checkbox"/>	<u>Shortlist</u>	<input type="checkbox"/>	<u>Reject</u>	<input type="checkbox"/>
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Recommendation (Please agree this with your Director)

Proceed to Council.

## Business Case Approval

	Comments (if any)	Accepted (Yes/No)	Date
<b>Corporate Management Team (CMT)</b>			
<b>Cabinet</b>			
<b>Council</b>			



# **Merthyr Tydfil County Borough Council - Integrated Impact Assessment**

(Includes Well-being of Future Generations, Protected Characteristics, Welsh Language, Socio-economic Disadvantage, Decarbonisation, Sustainability and Biodiversity, Consultation/Engagement and Data/Evidence)



Before completing this Integrated Impact Assessment (IIA), please refer to the corresponding **guidance document**, which provides essential background information.

An IIA MUST be completed for:

- Any Council / Cabinet report.
- Any strategic decisions being taken where due regard is required to reduce inequalities of outcome resulting from socio-economic disadvantage.
- Any project (i.e. something that has a start and end date and is different from day to day business).
- Where you are implementing significant change e.g. service provision.

This IIA helps to support the Council in making informed and effective decisions whilst ensuring compliance with a range of relevant legislation. This IIA must be completed at the start of any project or proposal.

<b>Title of Report / Project:</b>	SAB Design Engineer Post					
<b>Officer completing IIA:</b>	Carwyn Morris					
<b>Lead Officer / Project Manager:</b>	Carwyn Morris					
<b>Service:</b>	Engineering and Highways					
<b>IIA completion date:</b>	30 <sup>th</sup> January 2024					
<b>Type of proposal: (please place an X in the relevant box)</b>	<input type="checkbox"/>	Policy	<input type="checkbox"/>	Strategy	<input checked="" type="checkbox"/>	Plan
	<input type="checkbox"/>	Practice	<input type="checkbox"/>	Restructure	<input type="checkbox"/>	Procedure
	<input type="checkbox"/> Other (please identify):					
<b>Give a brief description of the proposal including the aims, and any links to relevant reports or documents:</b>	The purpose of this business case is to propose the creation of a new SAB Design Engineer post Grade 8, within the Engineering Drainage section to provide support to the SAB team and carry out additional private work to generate income.					

## 1. Merthyr Tydfil Well-being Objectives

### Does your proposal help to deliver any of the Council's Well-being Objectives?

How does your proposal help to deliver any or all of the Council's Well-being Objectives?

Well-being Objectives	Does your proposal have a positive or negative impact on the Council's Well-being Objectives? Please place an X in the relevant box.			Why have you come to this decision? Please provide an explanation.	What actions have been/will be taken to better contribute to positive impacts and/or mitigate any negative impacts? How will you know when this has been achieved?
	Positive	Negative	Neutral		
<p><b><u>'An Aspirational Merthyr Tydfil focused on learning'</u></b> We will strengthen how we enable people to grow and reach their potential.</p>	X			<p>The new staff are provided with skills to equip them for life and will become successful learners and confident individuals. In addition to this, it is a corporate policy that all new employees must be either have a level 1 in Welsh or be prepared to undertake the training. This is a positive impact on the national target of the number of Welsh speakers in the County Borough and in Wales.</p>	<p>The actions we will take to mitigate <b>this positive impact</b> are:</p> <ul style="list-style-type: none"> <li>Tailored individual staff training programmes will be provided (including Level 1 in Welsh).</li> <li>The potential opportunity to take further qualification levels in Welsh.</li> </ul> <p>We will continue to monitor and review the service to ensure that we are doing all that we can to mitigate any future risks.</p>
<p><b><u>'A Healthier Merthyr Tydfil'</u></b> We will empower people to live independent and dignified lives.</p>	X			<p>Flooding can cause physical injury, illness and loss of life. Deep, fast flowing or rapidly rising flood waters can be particularly dangerous.</p> <p>SuDS not only improve the quality of surface water runoff and decrease runoff volumes but also improve certain aspects of developments such as biodiversity, <b>public amenity</b> and make areas more visually attractive and vibrant. They can help combat the adverse effects of climate</p>	<p>We will continue to monitor and review the service to ensure that we are doing all that we can to mitigate any future risks.</p>

				change by reducing temperatures at street level in urban areas and reducing volumes of rainfall-runoff which can aid to alleviate flooding issues.	
<p><b><u>'A Safe &amp; Prosperous Merthyr Tydfil'</u></b> We will support how our economy recovers and grows; ensuring people feel safe in their local area.</p>	X			<p>Flooding can be a disaster for any business. As well as flood damage to business property or equipment, you may lose stock and supplies and find that you cannot trade until the flood damage is repaired. You may lose contracts and your customers may go elsewhere. Flooding can also cause physical injury, illness and loss of life. Deep, fast flowing or rapidly rising flood waters can be particularly dangerous.</p>	<p>We will continue to monitor and review the service to ensure that we are doing all that we can to mitigate any future risks.</p>
<p><b><u>'A Clean &amp; Green Merthyr Tydfil'</u></b> We will support the creation of a clean and green environment now and in the future.</p>	X			<p>SuDS enhance the local environment and provide multiple benefits i.e. water quality, amenity and biodiversity. Such enhancements will improve flood resilience to local communities and businesses and provide a richer landscape in which local economies can thrive.</p>	<p>Sustainable drainage aims to mimic natural drainage systems by controlling water as close to the source and surface as possible. The design of SuDS will take into account climate change and provide multiple benefits in the form of improving water quality, enhancing amenity areas and provide greater biodiversity opportunities. We will continue to monitor and review the service to ensure that we are doing all that we can to mitigate any future risks.</p>

**Sources of evidence to support the above (please use this information when completing the section 'Data and Evidence'):**

The Flood and Water Management Act 2010.  
CIRA SuDS Design Manual.  
[Cymraeg 2050 - A million Welsh speakers](#)

## 2. Sustainable Development Principles (The Five Ways of Working)

### Does your proposal demonstrate you have met the sustainable development principles (five ways of working)?

The Well-being of Future Generations (Wales) Act 2015 requires the Council to consider how any proposals improve the social, economic, environmental and cultural well-being, whilst also looking to the future, planning for the long term and ensuring that we do not compromise the ability of future generations to meet their own needs. Please consider the national well-being goals when completing this section.

<b>Five Ways of Working</b>	<b>How does your proposal demonstrate you have met the five ways of working when developing the proposal?</b>	<b>Are there any additional actions to be taken to better contribute to the five ways of working and/or mitigate any negative impacts? How will you know when this has been achieved?</b>
<b>Long Term</b> - Thinking and planning for the long term, balancing short term and long term needs.	There are long term benefits for the department in implementing a new post as this will generate revenue for the authority and create resilience in the department. In addition, this exercise is in response to the risk that the Council may not balance the budget and is not financially stable. Introducing this new role as explained in the business case will contribute towards the Council achieving long term savings, which will better protect the Engineering and Highways Services for the future.	The amount of work and income generated will provide an indication of achievement.  We will continue to monitor and review the service to ensure the service needs are still being met, and we are doing all that we can to mitigate any future risks.
<b>Prevention</b> - Preventing problems occurring or getting worse.	Designing SuDS, approving schemes and inspecting construction work will prevent flooding problems for our communities.	We will continue to monitor and review the service to ensure the service needs are still being met, and we are doing all that we can to mitigate any future risks.
<b>Integration</b> - Impact on our well-being objectives, national well-being goals and the well-being objectives of other public bodies.	Designing SuDS are in accordance with Schedule 3 of the Flood and Water Management Act 2010. We will also ensure that our proposed initiative will continue to align with the Councils key strategies and plans.	We will continue to monitor and review the service to ensure the service needs are still being met, and we are doing all that we can to mitigate any future risks.
<b>Collaboration</b> - Acting in collaboration with others inside and outside the Council.	The SuDS team have good working relationships with a number of local authorities and currently undertake work for them. However, there are further	We will continue to monitor and review the service to ensure the service needs are still being met, and we are doing all that we can to mitigate any future risks.

	opportunities to work in collaboration with other local authorities and private developers.	
<b>Involvement</b> - Involving people with an interest in achieving the well-being goals and who reflect the diversity of our communities.	The SuDS Approving Body (SAB) will liaise and consult with developers, land owners as well as internal partners as part of the approval process. Relevant stakeholders who have an interest in the proposal have been involved (where necessary) in the development of the business case.	Continue to involve stakeholders at key points within the process.
<b>Sources of evidence to support the above (please use this information when completing the section 'Data and Evidence'):</b>  Flood and Water Management Act 2010, National standards for sustainable drainage systems. The financial settlement received from Welsh Government		

<b>3. <u>Protected Characteristics (including Welsh Language)</u></b>					
<b>Does your proposal directly impact on service users, employees and/or the wider community, including the nine protected characteristic groups and Welsh language as identified below?</b> 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 and foster good relations between different groups. Please note that an individual may have more than one protected characteristic.					
Protected Characteristics	Does your proposal have a positive or negative impact on service users, employees and/or the wider community, including the nine protected characteristic groups and Welsh language? Please place an X in the relevant box.			Why have you come to this decision? Please provide an explanation.	What actions have been/will be taken to better contribute to positive impacts and/or mitigate any negative impacts? How will you know when this has been achieved?
	Positive	Negative	Neutral		
Age - People of all ages.			X	There will be no impact	All protected Characteristics will be monitored going forwards

<b>Disability</b> - People with disabilities/long term conditions.			X	There will be no impact	As above
<b>Gender Reassignment</b> - People whose gender identity or gender expression is different to the sex they were assigned at birth.			X	There will be no impact	As above
<b>Marriage and Civil Partnership</b> - People who are married or in a civil partnership.			X	There will be no impact	As above
<b>Pregnancy and Maternity</b> - Women who are pregnant and/or on maternity leave.			X	There will be no impact	As above
<b>Race</b> - People from black, Asian and minority ethnic communities and different racial backgrounds.			X	There will be no impact	As above
<b>Religion or Belief</b> - People with different religions and beliefs including people with no beliefs.			X	There will be no impact	As above
<b>Sex (Gender)</b> - Women and men, girls and boys and those who self-identify their gender.			X	There will be no impact	As above
<b>Sexual Orientation</b> - Lesbian, gay, bisexual, heterosexual.			X	There will be no impact	As above
<b>Welsh Language</b>					
The Welsh Language Wales 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.					
<b>Welsh Language</b> - Opportunities for people to use and promote the Welsh language, treating the Welsh language no less favourably	X			It is a corporate policy that all new employees must be either have a level 1 in Welsh or be prepared to undertake the training.	All training will be provided and the potential opportunity to take further qualification levels in Welsh.

than the English language, compliance with Welsh Language Standards, links with internal and external Welsh Language strategies.				This is a positive impact on the national target of the number of Welsh speakers in the County Borough and in Wales.	
<b>Sources of evidence to support the above (please use this information when completing the section 'Data and Evidence'):</b>  <a href="#">Cymraeg 2050 - A million Welsh speakers</a>					

<b>4. <u>Socio-economic Disadvantage (Strategic Decisions)</u></b>					
<b>Does your proposal impact/deliver better outcomes for those who are experiencing socio-economic disadvantage?</b> The Socio-economic Duty places a responsibility on the Council to have 'due regard' to how we can reduce inequalities of outcome caused by socio-economic disadvantage when making strategic decisions. This duty gives us an opportunity to do things differently and put tackling inequality 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: Single parents and vulnerable families, pensioners, carers, looked after children, single adult households, armed forces community, people with low literacy/numeracy, people who are homeless, people who have experienced the asylum system, students, people of all ages leaving a care setting, people living in the most deprived areas of Wales, people misusing substances, people involved in the criminal justice system, people who are not in education, employment or training. Please see the guidance document for more information.					
<b>Socio-economic Disadvantage</b>	<b>Does your proposal have a positive or negative impact on socio-economic disadvantage for service users, employees and/or the wider community? Please place an X in the relevant box.</b>			<b>Why have you come to this decision? Please provide an explanation.</b>	<b>What actions have been/will be taken to better contribute to positive impacts and/or mitigate any negative impacts? What steps will be taken to reduce inequalities of outcome? How will you know when this has been achieved?</b>
	<b>Positive</b>	<b>Negative</b>	<b>Neutral</b>		

<b>Low Income/Income Poverty</b> - Unable to afford to maintain regular payments such as bills, food, clothing, transport, other essential items etc.			X	There will be no impact	All socio-economic disadvantaged groups will be monitored going forward.
<b>Low and/or No Wealth</b> - Enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provision for the future.			X	There will be no impact	As above
<b>Material Deprivation</b> - Unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, leisure and hobbies etc.			X	There will be no impact	As above
<b>Area Deprivation</b> - Where you live e.g. rural areas, and where you work e.g. accessibility of public transport.			X	There will be no impact	As above
<b>Socio-economic Background</b> - Social class i.e. parents' education, employment and income.			X	There will be no impact	As above
<b>Socio-economic Disadvantage</b> - 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?			X	There will be no impact	As above



Sources of evidence to support the above (please use this information when completing the section 'Data and Evidence'):

N/A

**5. Decarbonisation and Climate Change Objectives**

**Does your proposal help to deliver the Council's Decarbonisation Plan?**


How does your proposal impact on the 6 key themes to help achieve the Council's commitment to become carbon neutral by 2030?

Welsh Government is aiming to achieve a carbon neutral public sector by 2030. This is driven by key legislation including: Well Being of Future Generations (Wales) Act 2015; Environment (Wales) Act 2016; Climate Change (Wales) Regulations 2018.

In response to this the Council has developed a Net Zero Roadmap with a themed approach to deliver our Decarbonisation Plan. This will be delivered through the 6 key themes below:

Decarbonisation Plan Theme Areas	Does your proposal have a positive or negative impact on the Council's Decarbonisation Plan? Please place an X in the relevant box.			Why have you come to this decision? Please provide an explanation.	What actions have been/will be taken to better contribute to positive impacts and/or mitigate any negative impacts? How will you know when this has been achieved?
	Positive	Negative	Neutral		
<b>Theme 1 – Buildings and Planning</b> Reducing or removing GHG emissions from existing property portfolio and new developments e.g. heat pump systems, solar panels.			X	The proposal does not directly impact on the Council's Decarbonisation Plan Themes 1, 2, 3, 4, and 6. However, SuDS components can lead to a reduction and/or sequestration of carbon. Other categories cover the reduction of carbon and the associated methods of assessment, and include: <ul style="list-style-type: none"> <li>• Reduced surface water pumping, wastewater pumping/treatment, leading to reduced energy use and associated carbon emissions;</li> </ul>	N/A

				<ul style="list-style-type: none"> <li>Embodied carbon (avoided) as a result of reduced consumption (eg due to rainwater harvesting); and</li> <li>Cooling/shading of buildings, leading to reduced energy use and associated carbon emissions.</li> </ul> <p>Carbon sequestration impacts include sequestration of carbon by newly planted trees and other vegetation. The benefits pathway diagram below shows how SuDS can make a contribution.</p>	
<b>Theme 2 – Travel and Transport</b> Reducing or removing GHG emissions in the Council's fleet and equipment, and supporting sustainable travel e.g. electric vehicles, bike schemes, EV charging.			X	As above.	N/A
<b>Theme 3 – Procurement of Goods &amp; Services</b> Consideration of carbon reduction options in procurement process, Consider ways to reduce supply chain impacts.			X	As above	N/A
<b>Theme 4 – Outsourced services (Leisure Trust)</b> Reduce and remove GHG emissions from			X	As above	N/A

leisure facilities e.g. low carbon options in new building or refurbishments <b>(N.B. only complete this section if direct impact on Leisure Trust).</b>					
<b>Theme 5 – Land Management</b> Maximising the Council’s land to increase biodiversity in open spaces, parks and woodlands.	X			<p>Biodiversity will be enhanced due to the creation of green spaces and habitat for wildlife within Merthyr as SuDS aim to mimic natural drainage regimes.</p> <p>There are a number of SuDS components that can make a significant contribution to the biodiversity (ecological) value of an area (eg green roofs, ponds, swales, wetlands, trees). The pathway diagram below shows the potential impact of SuDS on biodiversity. It is this biodiversity and ecology value that underpins some of the other functions, particularly those relating to health and wellbeing and management of flows and volumes.</p> 	SuDS will be constructed to effectively lower flow rates, increasing water storage capacity and reducing the transport of pollution to the water environment.
<b>Theme 6 – Governance</b> The Council is required to measure and report carbon emissions and carbon absorption. Are there outputs that can be captured and recorded from this project/decision?			X	<p>The proposal does not directly impact on the Council’s Decarbonisation Plan Themes 1, 2, 3, 4, and 6. However, SuDS components can lead to a reduction and/or sequestration of carbon. Other categories cover the reduction of carbon and the associated methods of assessment, and include:</p> <ul style="list-style-type: none"> <li>• Reduced surface water pumping, wastewater pumping/treatment, leading to reduced energy use and associated carbon emissions;</li> <li>• Embodied carbon (avoided) as a result of reduced consumption (eg due to rainwater harvesting); and</li> </ul>	N/A

			<ul style="list-style-type: none"> <li>Cooling/shading of buildings, leading to reduced energy use and associated carbon emissions.</li> </ul> <p>Carbon sequestration impacts include sequestration of carbon by newly planted trees and other vegetation. The benefits pathway diagram below shows how SuDS can make a contribution.</p>	
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**Sources of evidence to support the above (please use this information when completing the section ‘Data and Evidence’):**

Flood and Water Management Act 2010, National standards for sustainable drainage systems.

**6. Biodiversity and resilience of Ecosystems**

**How does your proposal impact on Biodiversity and therefore the resilience of Ecosystems?**  
 Under Section 6 of the Environment (Wales) Act 2016 we must seek to maintain and enhance Biodiversity within the proper exercise of our functions. In doing so, we must also seek to promote the resilience of Ecosystems.

Biodiversity and resilience of Ecosystems	What is the expected impact on Biodiversity? Please place an X in the relevant box.			Why have you come to this decision? Please provide an explanation.	What actions have been/will be taken to better contribute to the maintenance and enhancement of Biodiversity? How do you know when this has been achieved?
	Maintained	Enhanced	Reduced		
To maintain and enhance Biodiversity (and therefore promote the resilience of Ecosystems).		X		Biodiversity will be enhanced due to the creation of green spaces and habitat for wildlife within Merthyr as SuDs aim to mimic natural drainage regimes.	SuDs will be constructed to effectively lower flow rates, increasing water storage capacity and reducing the transport of

				There are a number of SuDS components that can make a significant contribution to the biodiversity (ecological) value of an area (eg green roofs, ponds, swales, wetlands, trees). The pathway diagram below shows the potential impact of SuDS on biodiversity. It is this biodiversity and ecology value that underpins some of the other functions, particularly those relating to health and wellbeing and management of flows and volumes	pollution to the water environment.
<b>Sources of evidence to support the above (please use this information when completing the section 'Data and Evidence'):</b>					
Flood and Water Management Act 2010, National standards for sustainable drainage systems.					

<b>7. <u>Consultation and Engagement</u></b>			
<b>What consultation and/or engagement has been undertaken to inform the development of the proposal?</b>			
There may be a legal requirement to consult in some instances, or a legitimate expectation that consultation will take place. Where it has been determined that consultation is required, the Gunning Principles must be adhered to.			
<ul style="list-style-type: none"> <li>• The proposals are still at a formative stage.</li> <li>• There is sufficient information to give 'intelligent consideration'.</li> <li>• There is adequate time for consideration and response.</li> <li>• 'Conscientious consideration' must be given to the consultation responses before a decision is made.</li> </ul>			
Please consider: Protected Characteristic groups, those who are experiencing socio-economic disadvantage, communities and places of interest, other stakeholders, forums, community groups and community councils. Please see the guidance document for more information.			
<b>Consultation and Engagement</b>	<b>Has consultation and/or engagement been undertaken on the proposal? Please place an X in the relevant box.</b>	<b>Briefly describe any recent or planned consultation and/or engagement exercises, paying</b>	<b>Who was consulted/engaged with? Was sufficient information provided to allow an informed decision on the proposal to be made?</b>

	Undertaken	Due to be undertaken	Not required	particular attention to evidencing the Gunning Principles. Please identify when the consultation and/or engagement took place or will take place, or why it is not required.	What were the key findings of the consultation and/or engagement? Have these findings been taken into account? Is further consultation and/or engagement required?
Requirement for consultation and/or engagement to be undertaken, or a legitimate expectation that it will take place.			X	We will follow the consultation process in line with HR policy.	We will follow the consultation process in line with HR policy.
Sources of evidence to support the above (please use this information when completing the section 'Data and Evidence'):					
N/A					
<b>8. <u>Data and Evidence</u></b>					
<b>What data or other evidence has been used to inform the development of the proposal?</b>					
Evidence may include the outcome of previous consultation or engagement exercises, existing databases, pilot projects, review of customer complaints and compliments and other service user feedback, national and regional data, academic publications and reports, future trends, horizon scanning, business plans etc. Consider the sources of evidence from all of the sections in your explanation.					
<b>Data and Evidence</b>	<b>Has data and evidence been used in order to inform the proposal? Please place an X in the relevant box.</b>		<b>What data or other evidence has been used to inform the development of the proposal? What have been the key findings of this data and evidence? Has this data and evidence helped to inform the proposal?</b>	<b>How has the data and evidence helped to inform the proposal? If the data and evidence did not support the proposal, why was this? Have there been any gaps identified? If so, what steps will be taken to cover the identified gaps?</b>	
	<b>Yes</b>	<b>No</b>			

<b>Data and evidence used in order to inform the proposal.</b>	X		<ul style="list-style-type: none"> <li>• Number of SAB, pre-applications, site inspections, planning applications over the last few years.</li> <li>• Financial figures</li> <li>• The financial settlement received from Welsh Government has informed our budget for the next financial year. Therefore, this proposal is requirement to mitigate the risk that the Council may not balance the budget and is not financially stable.</li> </ul>	<ul style="list-style-type: none"> <li>• The data provided the costs each year to allow future income to be estimated.</li> <li>• To determine cost savings,</li> <li>• The financial settlement received from Welsh Government has informed our budget for the next financial year. Therefore, this proposal is requirement to mitigate the risk that the Council may not balance the budget and is not financially stable.</li> </ul>
<p><b>Sources of evidence to support the above:</b></p> <p>SAB records and Planning data.  The financial settlement received from Welsh Government</p>				

## 9. Summary

**As a result of completing this IIA, please identify below;**

- The number of positive, negative or neutral scores for the Council's Well-being objectives, the sustainable development principles, protected characteristics including Welsh Language and Socio-economic disadvantage.
- If consultation and/or engagement has been undertaken, is due to take place or is not required.
- If data and evidence has been used in order to inform the proposal.
- If the proposal maintains, enhances or reduces the resilience of ecosystems.

**The table below should then be included in the related Council/Cabinet report.**

	Positive Impacts	Negative Impacts	Neutral
9. <b>Merthyr Tydfil Well-being Objectives</b>	4 of 4	0 of 4	0 of 4
10. <b>Sustainable Development Principles</b>	5 of 5	0 of 5	0 of 5
11. <b>Protected Characteristics (including Welsh Language)</b>	1 of 10	0 of 10	9 of 10
12. <b>Socio-economic Disadvantage</b>	0 of 6	0 of 6	6 of 6
13. <b>Decarbonisation</b>	1 of 6	0 of 6	5 of 6
14. <b>Biodiversity and the resilience of Ecosystems</b>	<b>Maintained</b>	<b>Enhanced</b>	<b>Reduced</b>
	0 of 1	1 of 1	0 of 1
15. <b>Consultation and Engagement</b>	<b>Undertaken</b>	<b>Due to be Undertaken</b>	<b>Not Required</b>
	0 of 1	0 of 1	1 of 1
16. <b>Data and Evidence</b>	<b>Yes</b>		<b>No</b>
	1 of 1		0 of 1
<b>Summary</b>			
<b>The main positive impacts are:</b>	<ul style="list-style-type: none"> <li>• The well-being objectives can be met as Schedule 3 of the Flood and Water Management Act 2010 will ensure sustainable drainage systems (SuDS) are implemented in Merthyr Tydfil. As well as reducing flood risk, these SuDS will enhance the local environment and provide multiple benefits i.e. water quality, amenity and biodiversity. Such enhancements will improve flood resilience to local communities and businesses and provide a richer landscape in which local economies can thrive.</li> </ul>		



	<ul style="list-style-type: none"> <li>• The statutory duty ensures long term benefits as the provision of SuDS is mandatory for new developments. Close working arrangements with internal and external partners is an essential component of the SuDS approval process. External partners include NRW, Welsh Water, other local authorities and developers. Internal partners involve collaboration with Building Control, Legal, Planning and Countryside and Environmental Health.</li> <li>• <b>Biodiversity</b> will be enhanced due to the creation of green spaces and habitat for wildlife within Merthyr Tydfil as SuDs aim to mimic natural drainage regimes. SuDs achieve this by lowering flow rates, increasing water storage capacity and reducing the transport of pollution to the water environment.</li> </ul>
<p><b>The main negative impacts are:</b></p>	<p>None</p>

## 10. Actions

Based on the summary of your positive and negative impacts identified in the Summary section above, will you need to make changes to your proposal to better contribute to positive impacts and/or mitigate any negative impacts?

Please identify any further actions you will need to undertake to better inform this proposal e.g. whether further consultation is required or more data and evidence is required to better inform the proposal.

What are you going to do?	Estimated completion date	Who will be responsible?	Timelines/Milestones e.g. 6 months/over a year, etc.	Progress
N/A				

## 11. Version Control

The IIA should be used at the earliest stages of the development of the proposal and decision making process, and then honed and refined throughout to strengthen and shape the proposal. This section will act as an audit trail to evidence how the IIA has been developed over time.

Please use the table below to keep a record of this process so that we can demonstrate how we have delivered the sustainable development principles.

Version No.	Decision making stage	Date considered	Brief description of any amendments made following consideration
1	Council	February 2024	

## 12. Monitoring and Review

The implementation and the impact of the proposal should be monitored and reviewed throughout the development of the proposal.

Please identify how the proposal will be monitored and reviewed as it progresses, including the implementation of any amendments identified.

<a href="#"><u>How will the implementation and the impact of the proposal and any amendments be monitored?</u></a>	The number of additional SAB applications and private job requests will be recorded and monitored.
<a href="#"><u>When will the proposal be reviewed? How frequently will this take place?</u></a>	We will review every 12 months to assess impact.

<b><u>Who is responsible for monitoring and reviewing the proposal?</u></b>	Engineering department.
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<b>13. <u>IIA Approval</u></b>					
<b>IIA Approved by:</b>	Judith Jones	<b>Job Title:</b>	Director	<b>IIA Approval date:</b>	16 <sup>th</sup> February 2024