



City of Westminster Cabinet Member Report

Decision Maker:	Cabinet Member for Planning and Public Realm
Date:	24 May 2017
Classification:	General Release
Title:	Hyde Park and Paddington Neighbourhood Forum Designation
Wards Affected:	Hyde Park
City For All Summary	Contributes to the achievement of a City for All by promoting civic leadership and responsibility and opportunity and fairness across the city enabling communities to have a greater role in enhancing their neighbourhoods.
Key Decision:	This report does not involve a Key Decision
Financial Summary:	The City Council has reached its limit on the number of Neighbourhood Area and Neighbourhood Forum grants that can be applied for from Government. To date it has received a total of £150,000 of Government funding for making such designations. There will be future opportunities for funding following the successful examination of a neighbourhood plan, and potentially through the council's Westminster Community Infrastructure Levy receipts as set out in section 6 of this report.
Report of:	Director of Policy, Performance and Communications

1. EXECUTIVE SUMMARY

- 1.1 The Localism Act 2011 and Neighbourhood Planning Regulations 2012 (as amended) enable communities to undertake neighbourhood planning. In particular, this includes the opportunity to establish a neighbourhood forum, and produce a statutory neighbourhood plan and/or a neighbourhood development order.

- 1.2 To be able to undertake neighbourhood planning, a local community group has to first apply for a neighbourhood area to be designated by the local authority; and then secondly apply to be designated as the representative neighbourhood forum in that area (unless there is a parish council in operation).
- 1.3 Following the designation of the Hyde Park and Paddington Neighbourhood Area, an application was submitted in December 2016 for formal neighbourhood forum status.
- 1.4 This report enables a designation decision to be made in relation to the proposed Hyde Park and Paddington Neighbourhood Forum. The application was subject to a formal period for representations from 8th March to 20th April 2017. Six responses were received; three of those were supportive of the proposed neighbourhood forum. No objections were received

2. RECOMMENDATIONS

- 2.1 The Cabinet Member is requested to consider the representations received in response to the proposed Hyde Park and Paddington Neighbourhood Forum, the subject of this report, as summarised in Appendix C.
- 2.2 For the reasons set out in Section 3 (and in more detail in Section 5) of this report it is recommended that the Cabinet Member makes the following decision:
 - i. Designate the proposed Hyde Park and Paddington Neighbourhood Forum as the neighbourhood Forum for the Hyde Park and Paddington Neighbourhood Area.
- 2.3 It is recommended that a formal designation notice is published under delegated authority of the council's Director of Policy, Performance and Communications, following the Cabinet Member decision in relation to the Hyde Park and Paddington Neighbourhood Forum application.

3. REASONS FOR DECISION

- 3.1 The proposed Hyde Park and Paddington Neighbourhood Forum is considered to meet the requirements of the neighbourhood planning legislation. The Forum's written constitution clearly states that it has been established for the express purpose to promote and improve the social, economic or environmental well-being of the Hyde Park and Paddington Area, whilst it also has a membership of more than 21 persons and is open to individuals who live or work in the area.
- 3.2 Furthermore, the Hyde Park and Paddington Neighbourhood Forum is considered to be representative of the designated Hyde Park and Paddington Neighbourhood Area. The membership drawn from different

parts of Hyde Park and Paddington and from different sections of the community. It is considered that the purpose of the neighbourhood Forum and its proposal to address itself to issues of local concern, including the preservation and improvement of the area, reflects the general existing character of the area.

- 3.3 The proposed Hyde Park and Paddington Neighbourhood Forum received support during its respective period for representations. The City Council received a total of six responses of which three were explicitly supportive of the Forum. No objections were received.

4. BACKGROUND

Neighbourhood Planning

- 4.1 The Localism Act 2011 and Neighbourhood Planning Regulations 2012 (as amended) enable communities to undertake neighbourhood planning. In particular, this includes the opportunity to develop a statutory neighbourhood plan that will become part of the development planning framework for their area, and also establish 'permitted development' rights for certain types of new development (through a 'neighbourhood development order'). To be able to undertake neighbourhood planning, a local community group has to firstly apply to designate a neighbourhood area; and then secondly apply to be designated as the representative neighbourhood Forum.

Neighbourhood Forums

- 4.2 The legislation states that neighbourhood Forums should consist of a minimum of 21 individuals who live or work (or are elected members of the local authority) within the area and have 'open' membership. The Forum should represent the diversity and character of the community, with a wide range of members including residents, businesses, amenity societies, local interest groups, and voluntary sector members. Neighbourhood Forum applications should contain a 'written constitution' setting out how the neighbourhood Forum intends to operate as well as a statement setting out how the Forum meets the legislative requirements. Once a neighbourhood Forum application has been received, the City Council has to publicise the application for a six week period to enable representations to be made before the neighbourhood Forum can be formally designated.
- 4.3 The council must take a decision on an application to designate a neighbourhood Forum within 13 weeks from when it was first published by the council.

Neighbourhood Plans

- 4.4 Once a neighbourhood Forum is in place, it can formally undertake neighbourhood planning, and begin to formally prepare their neighbourhood plan or neighbourhood development order. The neighbourhood development plan is a community-led framework which sets out policies in relation to the development and use of land in the whole or any part of a particular neighbourhood area specified in the plan.

4.5 Whilst it is up to the community (represented by the 'neighbourhood Forum') to decide upon the content of the neighbourhood plan, there are a number of principles that a neighbourhood plan must adhere to. The neighbourhood plan must:

- be 'in general conformity' with the City Council's strategic planning policies, currently contained in Westminster's City Plan (November 2016) and the Mayor's London Plan;
- have regard to national planning policies;
- contribute to the achievement of 'sustainable development'; and
- not breach and should be compatible with EU obligations, Human Rights Act etc

Beyond the above principles it is clear that a neighbourhood plan should also address *local*, neighbourhood issues; and should also be concerned about shaping the development of a local area in a *positive* manner, rather than be used to prevent development.

4.6 As the neighbourhood plan will be a statutory planning document there are a number of formal stages that have to be completed in its production. The government is clear that it is the neighbourhood Forum that produces the neighbourhood plan (not the local planning authority) following community involvement and information gathering. Once submitted, it is the local planning authority's responsibility to undertake a statutory period of formal consultation, and to submit the plan for examination by an independent examiner.

4.7 Following successful completion of the examination, the neighbourhood plan is subject to a referendum. Because Hyde Park and Paddington is designated as a 'Business' Neighbourhood Area both residents and non-domestic rate payers get an opportunity to vote in separate referendums on whether the neighbourhood plan or Order should come into legal force.

4.8 If the majority of those who vote in a referendum are in favour of the draft neighbourhood plan (or, where there is also a business referendum, a majority vote in favour of both referendums), then the neighbourhood plan or Order must be made (brought into legal force) by the local planning authority. If a majority of those who have voted in one of the referendums vote in support of making the draft neighbourhood plan or Order and the majority of those who vote in the other referendum do not support the making of the draft plan or Order, the local planning authority must decide whether the neighbourhood plan or Order should be brought into force.

Hyde Park and Paddington Neighbourhood Forum Application

4.9 The Hyde Park and Paddington Neighbourhood Forum application was submitted to the City Council in December 2016. This followed the formal designation of the Hyde Park and Paddington Neighbourhood Area in May 2014 (see background paper to this report). The Hyde Park and Paddington Neighbourhood Forum application was assessed to be 'valid'. As specified

by the Neighbourhood Planning Regulations 2012 (as amended), the application contained:

- the name of the proposed Forum;
- a copy of the written constitution of the proposed neighbourhood Forum;
- the name of the neighbourhood area to which the application relates and a map which identifies the area;
- the contact details of at least one member of the proposed neighbourhood Forum; and
- a statement which explains how the proposed neighbourhood Forum meets the conditions (i.e. minimum of 21 individuals who live or work in the area) contained in section 61F(5) of the Town and Country Planning Act 1990 (as inserted into the Act by the Localism Act 2011, Schedule 9).

4.10 The City Council undertook the formal period for representations between the 8th March and 20th April 2017. A total of six responses were received, of which three representations of support were received; from Councillor Floru and representatives of British Land and Sellar Property Group. They referenced their support of the organisation bringing forward the application and Sellar Property Group also welcomed the Forum's plans to influence planning and development in the Hyde Park and Paddington neighbourhood area in a positive and constructive manner.

4.11 No objections were received during the period for representations. There were three 'neutral' representations including one resident who expressed a desire for 'no more high rises'. The Environment Agency and Natural England have both provided information that may be helpful to the Forum should they decide to bring forward a neighbourhood plan. A summary of the representations received is set out in Appendix C.

5. ASSESSMENT OF THE HYDE PARK AND PADDINGTON NEIGHBOURHOOD FORUM APPLICATION

5.1 The submitted Hyde Park and Paddington Neighbourhood Forum application (attached in Appendix B) has been reviewed against both Section 61F (5) and (7) of Town and Country Planning Act 1990 as amended (as inserted into the Act by the Localism Act, Schedule 9) as set out below:

Assessment against Section 61F (5) (Town and Country Planning Act 1990 (as amended))

5.2 Section 61F (5) of the legislation sets out the conditions that a neighbourhood Forum must meet. In some respects this is a 'tick box validation exercise'. There is little requirement on the applicants to give more than the basic information. The legislation states that a local planning authority may designate an organisation or body as a neighbourhood Forum if the authority is satisfied that the following four conditions have been met:

- i) Established for the express purpose of promoting or improving the social, economic or environmental well-being of an area**

Response: The Hyde Park and Paddington Neighbourhood Forum written constitution (see Appendix B) states that the Forum has been established for the express purpose of promoting and improving the social, economic and environmental well-being of the Neighbourhood, residents and businesses of the designated Hyde Park and Paddington Neighbourhood Area.

ii) Membership is open to individuals who live or work in the area? (or are elected members of the City Council)

Response: The Hyde Park and Paddington Neighbourhood Forum's written constitution (Appendix B) clearly states that membership of the Forum is open to:

- (i) Residents who live in the Neighbourhood;
- (ii) Representatives of businesses or organisations who operate from within the Neighbourhood;
- (iii) Persons or organisations who own land or property in the Neighbourhood, or their representatives or agents;
- (iv) Representatives from PaddingtonNow BID and Marble Arch BID.
- (v) Ward Councillors

iii) Membership includes a minimum of 21 individuals each of whom lives or works (or is an elected member) in the area

Response: The proposed Hyde Park and Paddington Neighbourhood Forum has a total membership of 76 individuals, each of whom lives or works within the area or is an elected Member of the council. A full list of Members was submitted as part of the application. A redacted version of this list, removing personal addresses, was published as part of the consultation and a copy can be found with the application documents at Appendix B.

iv) The neighbourhood Forum has a written constitution

Response: The application made to the City Council includes a written constitution and this is attached within the application documents at Appendix B of this report.

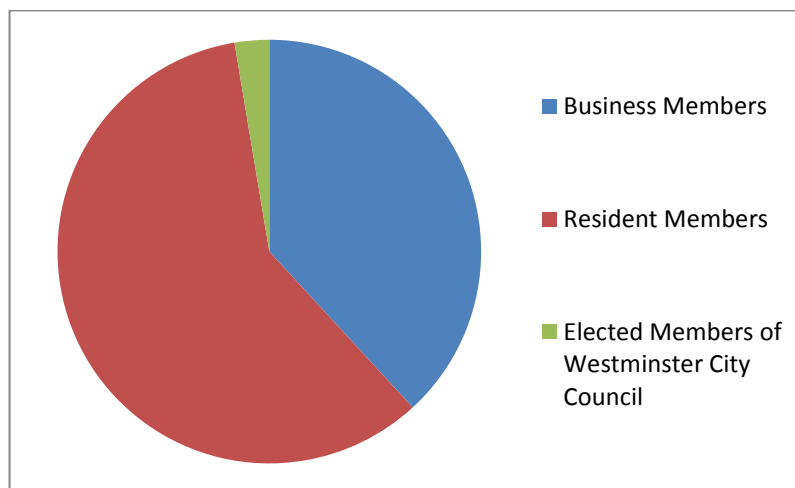
Assessment against Section 61F (7) (Town and Country Planning Act 1990 (as amended))

5.3 Section 61F (7) of the Act sets out the detailed considerations that a local planning authority must have regard to when determining an application for the designation of a neighbourhood Forum. This includes an assessment of the representative nature of the proposed Forum and whether its purpose reflects the character of the area, and is therefore a more thorough assessment of the proposed Forum. In determining whether to designate a neighbourhood Forum, the City Council must have regard to the following three considerations:

- i) **The desirability of designating an organisation or body which has secured (or taken steps to secure) membership from each of the required categories (i.e. people who live, work or are elected members).**

Response: At the time of application in December 2016, the proposed Hyde Park and Paddington Neighbourhood Forum had a total of 76 members each of whom lived and/or worked in the area (or were elected members of the local authority). The range of membership, including from each of the required categories, is illustrated in the diagram below. The proposed Forum clearly meets the legislative membership requirements.

Figure 1: Chart to show the percentage of current Members who live or work in the designated Hyde Park and Paddington Neighbourhood Area or who are elected members of Westminster City Council



The submitted written constitution sets out how the proposed Forum intends to operate and involve its members in its decision making. The Forum will seek to ensure that at all times it has a minimum of 21 Members and should it fall below this number it will suspend activities until such time that the number of members rises to 21 or above. The Forum will hold general meetings at intervals not exceeding six months. The constitution stipulates that eighteen members must be present at the start of the meeting for it to be declared quorate. All general meeting decisions will be made by a majority vote. It should be noted that upon any vote each business registered in the Area shall have one vote, regardless of the number of Business Members who work for that business.

The Forum will be managed by a steering group which shall comprise sixteen Members all of whom will have stood for election at an Annual General meeting. All Members will be entitled to stand for election to the Steering Group. The constitution stipulates that the Steering Group shall comprise eight Residential Members and eight representatives of

businesses and organisations. The Residential Members must include a representative of the Hyde Park Estate Association and the Business Members must include a representative from each of the PaddingtonNow BID and the Marble Arch London BID.

If a representative of a not for profit organisation stands for election to the Steering Group, it can take priority over either Resident or Business Members if there are already seven Resident and seven Business Members elected onto the Group. In such a case it shall be designated as a Resident Member or Business Member as appropriate.

The Steering Group will propose the officer positions of Chair, Vice Chair, Treasurer and Secretary to serve terms of up to two years. If the position of Chair is held by a Residential Member, the position of Vice Chair must be held by a Business Member. Likewise, if the position of Chair is held by a Business Member, the position of Vice Chair must be held by a Residential Member.

The constitution is therefore drafted in such a manner as to ensure that the Steering Group is both balanced and representative of a cross-section of the differing interests within the neighbourhood.

ii) Whether membership is drawn from different places in the neighbourhood area concerned and from different sections of the community in the area.

Response: The proposed Hyde Park and Paddington Neighbourhood Forum submitted written constitution states that the Forum will seek to maintain a membership representative of the whole community, balanced appropriately between residents and representatives from organisations and businesses. That within the Residential Members, it will seek to maintain a balance between Residents of different sub neighbourhoods and types of dwelling and that within the Business Members, to seek to maintain a balance between the various types and sizes of commercial concerns. Within the not-for-profit sector, the Forum will seek out members who can communicate the wide variety of views from within the sector. The aim is for the Forum to provide good community intelligence to inform the pursuit of its purposes.

The current membership of the proposed Forum highlights that there is good representation from throughout the neighbourhood area of both residents and businesses. The residential members are mainly from the areas south of Praed Street and north of Bayswater Road with residential being the predominant land use in this part of the Neighbourhood Area. There is a relatively high proportion of Business Members representing local hotels in the area which is reflective of business uses in the area. The main developers associated with the Paddington Opportunity Area are well represented as are other businesses in the area through the membership of the PaddingtonNow BID.

iii) Whether the *purpose* of the neighbourhood Forum reflects (in general terms) the character of the area.

Response: The written constitution sets out the key objectives of the Hyde Park and Paddington Neighbourhood Forum. It states that the Forum shall have the purposes of promoting and improving the social, economic and environmental wellbeing of the Neighbourhood, Residents and Businesses of the Hyde Park and Paddington area. It states that it shall address itself to issues of local concern, including (but not limited to) the preservation and improvement of Hyde Park and Paddington (including its environment, appearance, safety, security and amenities) and high standards of town planning, urban design and architecture.

The Neighbourhood Forum aims to give a voice to the residents and representatives of businesses and organisations of the Neighbourhood and to reflect their aspirations and concerns, to promote Hyde Park and Paddington. It aims, in collaboration with the City of Westminster and with other relevant organisations and individuals, to work to sustain and improve the area's economy and environment and the quality of life and amenity of its residents, businesses and visitors.

It is therefore considered that the purpose of the neighbourhood Forum reflects (in general terms) the character of the Hyde Park and Paddington Area which is a mix of both residential and business land uses.

6. FINANCIAL IMPLICATIONS

- 6.1 The high level of interest in neighbourhood planning in Westminster, coupled with the statutory obligation to support neighbourhood planning clearly has financial implications for the City Council. Before April 2016 local planning authorities (LPAs) could claim £5,000 per neighbourhood area designation and a further £5,000 per neighbourhood forum designation. Whilst there was a cap on how much funding could be applied for per annum, applications for funding could be made retrospectively. To date this has delivered to the City Council a total of £150,000 of funding to support neighbourhood planning.
- 6.2 In April 2016 the rules changed and a LPA may now only apply for funding for their first five designated neighbourhood areas and their first five designated neighbourhood Forums. This limit applies to the total number of areas designated and so includes areas and Forums designated in previous years. This means that the City Council will not be able to apply for further funding in respect of neighbourhood area and neighbourhood Forum designations as it has already exceeded this limit. This will not present a financial risk to the council as the majority of areas have now been designated and work on this area is currently resourced within the existing financial budget.
- 6.3 Whilst there are further opportunities for funding following the successful examination of a neighbourhood plan (£20,000 when a referendum date has

been set with a further £10,000 for business areas) this does mean that the council will be required to facilitate its statutory duty to support neighbourhood groups from existing resources. This includes funding for officer time, publishing and consulting on draft neighbourhood plans and the costs of holding an examination. Including the costs of holding a referendum this is likely to exceed the additional available funding per neighbourhood area. These costs can be met from the existing budget.

- 6.4 The Westminster Community Infrastructure Levy (CIL) charging schedule took effect on the 1st May 2016. The CIL Regulations 2010 (as amended) and associated government guidance put a duty on LPAs to identify a neighbourhood portion of CIL paid by development in each neighbourhood. In areas where there is not an established parish council in place Government guidance states that decisions on spending this neighbourhood portion should be taken by the council in agreement with local communities. The neighbourhood portion is set at 15% of Westminster CIL collected in respect of development in each neighbourhood, capped at £100 per council tax dwelling. This rises to 25% uncapped in places where a neighbourhood plan is in place.
- 6.5 On the 20th February 2017 the council's Cabinet approved a report setting out the principles of how Westminster's CIL will be governed. This included the arrangements for the governance of the neighbourhood portion of CIL. Cabinet agreed given the link with neighbourhood planning that the 22 currently approved neighbourhood areas should be used as the spatial framework for decision-making for the neighbourhood portion.
- 6.6 The neighbourhood proportion of a Westminster CIL can be used to support infrastructure required to support development of the neighbourhood area or anything else that may be required to support development of a neighbourhood area. The Westminster CIL may therefore provide future funding opportunities to assist with the development and implementation of neighbourhood plans, where they support the development of an area and by providing resources for governing the future spend of the neighbourhood proportions of a Westminster CIL.

7. LEGAL IMPLICATIONS

- 7.1 Section 61F (5) of the Town and Country Planning Act 1990 (as amended by the Localism Act 2011) states that a local planning authority may designate an organisation or body as a neighbourhood Forum if satisfied that it meets the following conditions:
- i) It is established for the express purpose of promoting or improving the social, economic or environmental well-being of an area;
 - ii) Its membership is open to individuals who live or work in the area (or are elected members of the City Council);
 - iii) Its membership includes a minimum of 21 individuals each of whom lives or works in the neighbourhood area concerned;
 - iv) It has a written constitution; and

v) Such other conditions as may be prescribed.

7.2 Section 61F (7) of the 1990 Act also states that in determining whether to designate a neighbourhood Forum, the local planning authority must have regard to the desirability of designating an organisation or body which has:

- secured (or taken steps to secure) membership from each of the required categories (i.e. people who live, work or are elected members);
- membership that is drawn from different places in the neighbourhood area concerned and from different sections of the community in that area; and
- a purpose that reflects (in general terms) the character of the area.

7.3 A local planning authority must take a decision on an application to designate a neighbourhood forum within 13 weeks from when it was first published. The time periods are prescribed in the Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2016.

7.4 Regulation 10 of the Neighbourhood Planning (General) Regulations states that as soon as possible after designating a neighbourhood Forum, the City Council must publish the following on our website (and in such other manner considered likely to bring it to the attention of those who live, or work in the neighbourhood area):

- the name of the neighbourhood Forum;
- a copy of the written constitution of the neighbourhood Forum;
- the name of the neighbourhood area to which the designation relates; and
- contact details for at least one member of the neighbourhood Forum.

7.5 It is intended that a formal designation notice will be published under the delegated authority of the Director of Policy, Performance and Communications following the Cabinet Member decision in relation to the Hyde Park and Paddington Neighbourhood Forum.

7.6 Section 61F (8) of the 1990 Act states that a neighbourhood Forum designation ceases to have effect five years after the date that the designation was made. At this point an organisation or body would be able to reapply for neighbourhood Forum status.

7.7 A designated neighbourhood Forum can also give notice to the City Council that it no longer wishes to be designated as the neighbourhood Forum for a neighbourhood area. In this instance the City Council would have to withdraw the formal designation of the neighbourhood Forum and must publish a statement setting out the details of the withdrawal (and details of where this statement can be inspected).

7.8 In addition, Section 61F (9) of the 1990 Act states that a local planning authority can also withdraw a neighbourhood Forum designation if it is considered that the body is no longer meeting the conditions on which it was

designated or any other criteria that the City Council had regard to in making the designation.

8. STAFFING IMPLICATIONS

- 8.1 There are implications on staff resources in respect of carrying out the City Council's duty to support neighbourhood planning, in terms of managing the neighbourhood area and Forum application process, but also in terms of providing support to the prospective neighbourhood Forums. In addition the City Council will be obliged to carry out the legal compliance assessment of any neighbourhood plans produced, support the examination (by independent examiner), and undertake the referendum. The City Council's obligation to support will be intensified by the comparatively large number of neighbourhood areas and Forums within Westminster.

9. RESOURCES IMPLICATIONS

- 9.1 The designation of additional neighbourhood Forums will have resource implications for the City Council in terms of the 'duty to support', including the completion of the statutory stages of neighbourhood plan production.

10. BUSINESS PLAN IMPLICATIONS

- 10.1 The ability to enable and empower communities to take responsibility for themselves and their neighbourhoods is one of the key tenets of the City Council's 'City for All' three-year plan.

11. CONSULTATION

- 11.1 As required by the legislation, the neighbourhood Forum application for Hyde Park and Paddington was formally published on the City Council's website between 8th March and 20th April 2017. In addition, letters were sent by email to residents' groups, societies, community groups, businesses, landowners within and adjacent to the Hyde Park and Paddington Neighbourhood Area to inform stakeholders of the neighbourhood Forum application and how to respond if they had any comments. Councillors were also notified of the neighbourhood Forum application. Posters were displayed in the local area and the council utilised social media in an attempt to make people aware of the application.

12. COMMUNICATIONS IMPLICATIONS

- 12.1 There is a need to ensure that any designation decisions are clearly communicated to those who live and work within the respective neighbourhood areas – in line with the City Council's legal obligations set out in Section 7 of this report.

Appendices

Appendix A	Other Implications
Appendix B	Hyde Park and Paddington Neighbourhood Forum Application
Appendix C	Summary of responses to consultation – proposed Hyde Park and Paddington Neighbourhood Forum

If you have any queries about this Report or wish to inspect any of the Background Papers please contact:

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BACKGROUND PAPERS

- Localism Act 2011
- Neighbourhood Planning Regulations 2012
- Westminster's City Plan November 2016.
- Cabinet Member Report – Hyde Park and Paddington Neighbourhood Area Designation

For completion by the **Cabinet Member for Planning and Public Realm**

Declaration of Interest

I have <no interest to declare / to declare an interest> in respect of this report

Signed: _____ Date: _____
NAME: **Councillor Daniel Astaire**

State nature of interest if any
.....
.....

(N.B: If you have an interest you should seek advice as to whether it is appropriate to make a decision in relation to this matter)

For the reasons set out above, I agree the recommendation(s) in the report entitled 'Hyde Park and Paddington Neighbourhood Forum Designation' and reject any alternative options which are referred to but not recommended.

Signed

Cabinet Member for Planning and Public Realm

Date

If you have any additional comment which you would want actioned in connection with your decision you should discuss this with the report author and then set out your comment below before the report and this pro-forma is returned to the Secretariat for processing.

Additional comment:
.....
.....
.....

If you do not wish to approve the recommendations, or wish to make an alternative decision, it is important that you consult the report author, the Director of Law, Chief Operating Officer and, if there are resources implications, the Director of Human Resources (or their representatives) so that (1) you can be made aware of any further relevant considerations that you should take into account before making the

decision and (2) your reasons for the decision can be properly identified and recorded, as required by law.

Note to Cabinet Member: Your decision will now be published and copied to the Members of the relevant Policy & Scrutiny Committee. If the decision falls within the criteria for call-in, it will not be implemented until five working days have elapsed from publication to allow the Policy and Scrutiny Committee to decide whether it wishes to call the matter in.

Other Implications

1. Risk Management Implications

1.1 The recommendations in this report do not have any significant Risk Management Implications

2. Health and Wellbeing Impact Assessment including Health and Safety Implications

2.1. The recommendations in this report do not have a significant impact on health and well-being.

3. Crime and Disorder Implications

3.1 The recommendations in this report do not have any significant crime and disorder implications.

4. Impact on the Environment

4.1. The recommendations in this report do not have any significant impact on the environment.

5. Equalities Implications

5.1. The recommendations in this report do not have any significant equalities implications.

6. Staffing Implications

6.1 Key staffing implications are set out in the main body of the report.

7. Human Rights Implications

7.1. The recommendations in this report do not have any significant human rights implications.

8. Energy Measure Implications

8.1. The recommendations in this report do not have any significant energy measure implications.