



City of Westminster Cabinet Member Report

Decision Maker:	Cabinet Member for Built Environment
Date:	7 June 2016
Classification:	General Release
Title:	St Johns Wood Neighbourhood Forum Designation
Wards Affected:	Abbey Road and Regents Park
Better City, Better Lives Summary	Contributes to the achievement of a 'City of Aspiration, Choice and Heritage' through 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. 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 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 firstly 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 St Johns Wood Neighbourhood Area, an application was submitted in December 2015 for formal neighbourhood forum status.
- 1.4 This report enables a designation decision to be made in relation to the proposed St Johns Wood Neighbourhood Forum. The application was subject to a formal period for representations from 17th February to 1st April 2016. Eighteen responses were received; of which fourteen 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 St Johns Wood 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 St Johns Wood Neighbourhood Forum as the neighbourhood forum for the St Johns Wood 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 St Johns Wood Neighbourhood Forum application.

3. REASONS FOR DECISION

- 3.1 The proposed St Johns Wood 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 St Johns Wood 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 St Johns Wood Neighbourhood Forum is considered to be representative of the designated St Johns Wood Neighbourhood Area. The membership drawn from different parts of St Johns Wood and from different sections of the community. It is considered that purpose of the neighbourhood forum – including ensuring that development respects the distinctive and historic character of St Johns Wood – reflects the general existing character of the area.

- 3.3 The proposed St Johns Wood Neighbourhood Forum received support during its respective period for representations. The City Council received a total of eighteen responses of which fourteen were supportive of the forum (no objections were received).

4. BACKGROUND

Neighbourhood Planning

- 4.1 The Localism Act 2011 and Neighbourhood Planning Regulations 2012 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.

Neighbourhood Plans

- 4.3 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.
- 4.4 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 the City Plan: Strategic Policies (adopted 2013) and 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.

- 4.5 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. Following successful completion of the examination, the neighbourhood plan is subject to a referendum whereby all those on the electoral register within the neighbourhood area are eligible to vote. A majority 'yes' vote in the referendum will require the City Council to formally 'make' the neighbourhood plan.

St John's Wood Neighbourhood Forum Application

- 4.6 The St Johns Wood Neighbourhood Forum application was submitted to the City Council in December 2015. This followed the formal designation of the St Johns Wood Neighbourhood Area in April 2013 (see background paper to this report). The St Johns Wood Neighbourhood Forum application was assessed to be 'valid'. As specified by the Neighbourhood Planning Regulations 2012, 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).

- 4.7 The City Council undertook the formal period for representations between the 17th February and 1st April 2016. A total of eighteen representations were received, of which 14 representations of support were received from residents and organisations including the Marylebone Cricket Club, St John's Hospice and the developers of the St John's Wood Square development. These supportive responses recognised the opportunity to undertake neighbourhood planning in St John's Wood.

- 4.8 No objections were received during the period for representations. There were four 'neutral' representations, of which two relate to the boundary of the

St John's Wood Neighbourhood Area, designated in April 2013. A summary of the representations received is set out in Appendix C.

- 4.9 The Royal Parks are concerned that none of their land should be included within the boundary of any of the Forum boundaries. They have suggested that the southern boundary of the proposed St John's Wood Neighbourhood Forum should not follow the Regent's Canal as this would then technically place part of Regent's Park within the Forum boundary. They on the same issue on a separate designated Neighbourhood Area and have asked the council to confirm that the boundaries will be amended. The Canal and Rivers Trust have also written in respect of the St Johns Wood Neighbourhood Area to state that they would like to understand what impact this may have on the canal and its towpath, and whether it would be better to amend the plan area, so that the canal can be properly incorporated in an area, or be outside of it, and not just form its boundary.
- 4.10 This application is for the designation of the proposed St Johns Wood Neighbourhood Forum and does not affect the designation of the Neighbourhood Area which was approved in April 2013. The boundary cannot therefore be amended through this application. It is however worth noting that the City Council has previously taken on board the Royal Parks comments in response to the designation of Neighbourhood Areas and has excluded the main Royal Parks within them. It is the Council's responsibility to designate neighbourhood areas in accordance with the relevant legislation and regulations. There is nothing that states that the Royal Parks cannot be included, in whole or in part, within a designated neighbourhood area. The area of land that is now being questioned by Royal Parks forms a sensible boundary between the designated Neighbourhood Area and Regents Park. The City Council will respond to the Royal Parks and the Canal and Rivers Trust on this matter.

5. ASSESSMENT OF THE ST JOHNS WOOD NEIGHBOURHOOD FORUM APPLICATION

- 5.1 The submitted St Johns Wood 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 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 St Johns Wood 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 designated St Johns Wood 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 St Johns Wood Neighbourhood Forum's written constitution (Appendix B) clearly states that membership of the Forum is open to:

- (i) individuals who are resident of the Area;
- (ii) businesses or other bodies or organisations which operate in the Area, through their appointed representatives;
- (iii) individuals who work in the Area (whether for businesses carried out there or otherwise);
- (iv) individuals who have an interest in the Area regarded by the Steering Committee as making membership appropriate;
- (v) Westminster City Councillors whose ward includes any part of the Area.

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 St Johns Wood Neighbourhood Forum has a total membership of 60 individuals, each of whom lives or works or is a Ward Councillor within the area. 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))

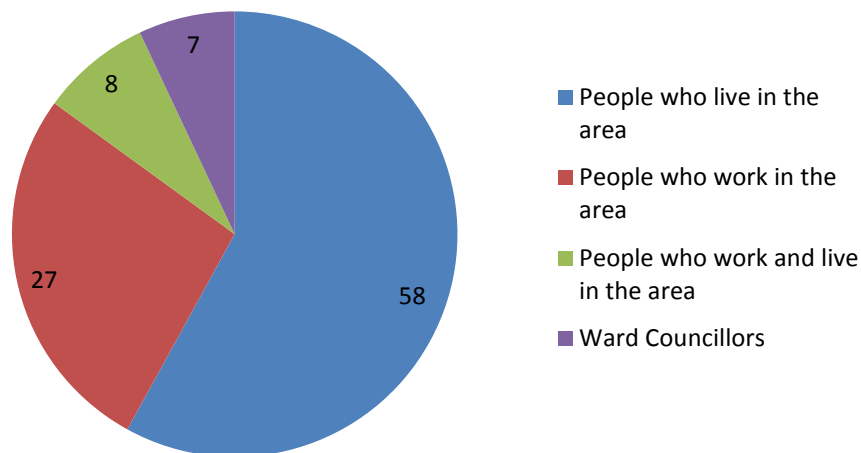
- 5.3 Section 61F (7) of the Act sets out the detailed considerations that a local planning authority must have regard to when determining an application for the designation of a neighbourhood forum. This includes an assessment of the representative nature of the proposed forum and whether its purpose 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 2015, the proposed St John Wood Neighbourhood Forum had a total of 60 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, work or who are elected Councillors in the designated St John's Wood Area



The submitted written constitution sets out how the proposed forum intends to operate and involve its members in its decision making. There will be at least two full forum meetings per year (including the annual general meeting). The constitution stipulates that twenty one members must be present at the start of the meeting for it to be declared a quorate. All forum decisions will be made by a majority vote.

All questions shall be determined by a simple majority of those present and voting, except for the following which shall require a majority of 75% of those present and voting:

- (i) the approval, and any subsequent amendment, of the constitution
- (ii) the approval of the Neighbourhood Plan and any Development Orders
- (iii) any modification to the Area

(iv) the allocation of Community Investment Levy funds

Like other neighbourhood forums, the written constitution states that the forum's day to day business will be managed by an elected Committee, consisting of up to 14 forum members. The membership of this Committee shall be equally balanced between the residential community and the non-residential community. It shall at all times include a minimum of two elected members of the St Johns Wood Society. The Committee will include a Chairperson, a Vice-Chairperson, Treasurer and Secretary and may appoint sub-committees.

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 St Johns Wood Neighbourhood Forum submitted written constitution states that the Forum will represent the diversity and character of the community with a wide range of members including businesses, amenity societies, local interest groups and voluntary members and will seek at all times to act on the basis of equality between, and respect for, all persons regardless of gender, age, ethnicity, nationality, sexual orientation, religion or belief, disability and socio-economic status.

The current membership of the proposed forum highlights that there is good representation from throughout the neighbourhood area. This includes from Clifton Hill, Carlton Hill and Quintin Kynaston Academy in the north of the neighbourhood area, Lodge Road and Lords Cricket Ground to the south, Hamilton Terrace and Abbey Gardens in the west, and Townshend Road and Charles Lane to the east.

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 St Johns Wood Neighbourhood Forum. The Forum aspires to improve the functioning of the designated area by consulting widely on, amongst other things, ways to:

- protect, preserve and enhance its unique character;
- encourage development of a high architectural design and respect to heritage guidelines in the Area;
- make the area more sustainable, protect garden and green spaces and bring environmental benefits to the area;
- make improvements for the street environment;
- seek to protect and improve community resources and facilities such as libraries, community centres and public facilities and;
- involve as many residents, local workers and local businesses in the process as possible.

The proposed Forum will encourage development that respects the distinctive and historic character of the Area and will apply the highest standards of architecture, town planning, sustainability, conservation, urban design and management for the socio-economic benefit of the Area and ensure that the public realm remains for the public use and appreciation, and is not used to promote the needs of any one group or constituency.

The proposed Forum's stated objectives are considered to generally reflect the character of the St John's Wood Neighbourhood Area which is primarily residential.

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 (LPA's) 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 is 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.
- 6.2 On 20th January 2016 Full Council approved the Westminster Community Infrastructure Levy charging schedule with an implementation date of 1st May 2016. The CIL Regulations (2010 and as amended) put into legislation a duty to pass a proportion of receipts arising from developments within a local parish council's area onto the relevant parish council (there is only one

local parish council in Westminster; the Queen’s Park Community Council). While the legislation requires the council to pay this portion of CIL directly to the Queen’s Park Community Council, elsewhere the money is retained by the Council. Neither the legislation nor supporting guidance specifies a process that has to be followed in other neighbourhood areas. Government guidance states that in these areas, decisions on spending the neighbourhood portion should be taken in agreement with local communities. What constitutes the ‘local community’ will be a matter for discussion in setting out governance arrangements for the neighbourhood portion of CIL, however guidance states that neighbourhood forums preparing neighbourhood plans, planning, theme specific neighbourhood groups, local businesses, and networks that ward councillors use should all be included.

6.3 The table below explains how the CIL funds should be apportioned in accordance with the relevant legislation governing the use of CIL.

Table 1: Apportionment of Community Infrastructure Levy Receipts

Portion	Percentage of receipts	Process
City CIL Strategic Portion	70% or 80% (see below)	Spend decided by council according to its strategic priorities Spend can be anywhere within Westminster- or outside – providing the infrastructure funded supports development.
Neighbourhood Portion	Currently 15% of CIL collected in respect of development in each neighbourhood, capped at £100 per council tax dwelling. This increases to 25% (uncapped) in places where a neighbourhood plan is in place	<u>Queen’s Park:</u> neighbourhood portion passed to community council who spends it. <u>Elsewhere:</u> spend decided by council in agreement with the neighbourhood communities in which development paying a CIL has taken place.

6.4 The council can retain 5% of its Community Infrastructure Levy (CIL) receipts for administration of a Westminster CIL. Furthermore 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 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 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 St Johns Wood 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. In particular, it meets the City Council's vision for 'A City of Choice' through creating opportunities for residents, businesses and visitors to make responsible choices for their neighbourhood; and 'A City of Heritage' which aims to ensure that each neighbourhood is a great place to live, work and visit.

11. CONSULTATION

- 11.1 As required by the legislation, the neighbourhood forum application for St Johns Wood was formally published on the City Council's website between 17th February and 1st April 2016. In addition, approximately 200 emails/letters were sent to residents' groups, societies, community groups, businesses, landowners within and adjacent to the St Johns Wood 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.

12. COMMUNICATIONS IMPLICATIONS

- 12.1 There is a need to ensure that the 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	St Johns Wood Forum Application
Appendix C	Summary of responses to consultation – proposed St John's Wood 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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rferry-jones@westminster.gov.uk

Telephone 020 7641 2418

BACKGROUND PAPERS

- Localism Act 2011
- Neighbourhood Planning Regulations 2012
- Westminster City Plan: Strategic Policies; adopted November 2013.
- Cabinet Member Report – St Johns Wood Neighbourhood Area Designation April 2013.

For completion by the **Cabinet Member for Built Environment**

Declaration of Interest

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

Signed: _____ Date: _____
NAME: **Councillor Robert Davis, MBE, DL**

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 'St Johns Wood Neighbourhood Forum Designation' and reject any alternative options which are referred to but not recommended.

Signed

Cabinet Member for Built Environment
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, City Treasurer 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.