



<b>Decision Maker:</b>	Cabinet Member for Finance, Property and Regeneration
<b>Date:</b>	6 <sup>th</sup> November 2019
<b>Classification:</b>	General Release, apart from appendices B and C, exempt from publication
<b>Title:</b>	Luxborough Street Development, London, W1U
<b>Wards Affected:</b>	Marylebone High Street Ward
<b>City for All Summary</b>	<p>Development on the site will enable Westminster City Council (WCC) to meet the 2017/2018 City for All commitments, specifically:</p> <ul style="list-style-type: none"><li>➤ City of Opportunity This scheme will deliver affordable housing and is committed to providing a community use, which will be beneficial to residents who live in the local area.</li><li>➤ Caring and fairer city By prioritising affordability, the scheme will be providing affordable housing within Marylebone ward.</li><li>➤ City that celebrates its communities By delivering more housing for the area with good quality, affordable housing to be included within the scheme creating a place that people are proud to live in.</li></ul>
<b>Key Decision:</b>	Yes
<b>Financial Summary:</b>	A fully affordable scheme would have a net capital cost of £5.875m, which could be offset by allocating affordable housing fund to the project. An allocation of £330k per an affordable unit, £4.620m in total, would enable delivery of a 100% affordable revenue neutral scheme.
<b>Report of:</b>	Emily Myers <a href="mailto:Emyers@westminster.gov.uk">Emyers@westminster.gov.uk</a> 07717 878729

## 1. Executive Summary

- 1.1 This Cabinet Member Report summarises the position set out in the Outline Business Case for the Luxborough Street development which was presented at Capital Review Group on 2nd May 2019.
- 1.2 This report concludes that the preferred option is for the Council to directly develop the scheme with a ground floor community use and residential above, with a provision of 100% affordable housing in the form of 14 intermediate units.
- 1.3 This option is preferred due to its ability to deliver a 100% affordable housing scheme (14 intermediate units) in Marylebone, along with a ground floor community use. These deliverables are closely aligned with the City for All aims of a City of Opportunity and a City that Celebrates its Communities.
- 1.4 The amount of funding required from the Affordable Housing Fund (AHF) to deliver an 100% Affordable scheme is £330K per unit, however, following approval of the OBC, an extra £300K has been secured for the scheme through the GLA funding 'Homes for Londoners: 2016-2021' Programme. The impact of additional external funding will be reviewed as the scheme progresses and reflected in the next iteration of the Capital Strategy, with the aim of maintaining a cost neutral scheme.

## 2. Recommendations

2.1 Cabinet Member for Finance, Property and Regeneration is recommended to:

- 1) That part of this report be exempt from disclosure by virtue of the Local Government Act 1972, Schedule 12A Part 1, paragraph 3 (as amended), in that these documents contain information relating to the financial or business affairs of any particular person (including the authority holding that information).
- 2) Approve the preferred option for the redevelopment of the Site to provide a ground floor community use with 14 affordable units above, in the form of intermediate rent as set out in paragraph 3.2
- 3) Delegate the final decision to determine the type of community use that will provided within the scheme to the Executive Director of Growth, Planning & Housing.
- 4) Approve direct development as the delivery option as set out in paragraph 3.10.

## 3. Reasons for Decision

3.1 In 2017, Cabinet Member approval was received for a total budget of £2.262M for the project. Circa £800K of this was for historic spend on the project, therefore a budget of £1.4M was confirmed for further project spend and approval to take the design to RIBA Stage 4 and progress the options outlined in the Cabinet Member Report in July 2017.

3.2 Preferred Option

The following potential Scoping Options have been considered for this scheme:

- Option 1: Reinstatement of the kickabout site
- Option 2: Community Use with Residential above
- Option 3: Mixed Tenure Residential

- Option 4: Fully affordable residential scheme

3.3 As part of the Outline Business Case, which is appended to this report, the project team identified objectives for the project, which are specific, measurable, achievable, relevant and time –constrained.

<b>Objective</b>	<b>Detail</b>
<b>Provide additional housing of any tenure</b>	More homes, of mixed tenures and sizes should be incorporated in to the design for the site
<b>Provide affordable housing</b>	The site can provide much needed affordable homes to meet the City for All targets
<b>Provide a community benefit as part of the scheme</b>	To identify a method in which the development benefits the overall community
<b>Provide landscaping improvements</b>	To improve the landscaping grounds surrounding the site which has been a key aspect of the Luxborough development scheme
<b>Scheme acceptable by Planning department</b>	In particular, the quantity of affordable housing and family size units if necessary

3.4 The Project Team also reviewed the Critical Success Factors. Critical Success Factors (CSF) are the attributes essential to the successful delivery of the development. If a potential option cannot demonstrate that it meets each of these criteria, then it cannot be recommended for approval. The five high-level critical success factors for this project were considered to be:

<b>Strategic Fit</b>	Does the project meet with the defined strategic and spending objectives, and does it fit with wider WCC?
<b>Value for Money</b>	Does the project meet with the defined strategic and spending objectives, and does it fit with wider WCC?
<b>Deliverable</b>	Is the project likely to be deliverable either through existing resources or supplier arrangements, or through new mechanisms created by the project?
<b>Affordable</b>	Is the project affordable in terms of either the funding streams currently available to the Council or proposed funding streams accessed through the project?
<b>Capacity/Capability</b>	Does the project match with the capability of known and available suppliers and are they likely to be interested in delivering the project?

3.5 Each of the Scoping Options were assessed against the project objectives and Critical Success Factors, the in-depth assessment can be found in the appended Outline Business Case.

3.6 Option 2 was found to meet all of the objectives and Critical Success Factors. This option provides a wider range of benefits to the community as it would include affordable housing as well as a community

use on the ground floor of the development. It would also be deemed acceptable to planning given that it provides the D1 Community use class. For these reasons, it is considered that Option 2 (community use with residential) is the Preferred Option.

### **3.7 Economic Appraisal**

- 3.7.1 The project team then tested four scenarios based on the Community Use scheme, each with differing levels of affordable housing which were then tested through an economic appraisal.
- 3.7.2 All of the options were based on a scheme of 14 residential units with a ground floor nursery with a discounted rent and assumed any affordable units would be intermediate rent. Further details of this can be found in the Outline Business Case.
- 3.7.3 With sufficient funding available through a GLA grant and the Affordable Housing Fund, it was concluded that it would be highly beneficial to deliver a 100% affordable housing scheme with a ground floor community use which would provide 14 intermediate units at discounted rent for the local community. This option was felt to benefit the community and respond to the shortage of affordable housing in the borough which is a key priority for the Council.
- 3.7.4 It is worth noting, that the amount of funding required from the Affordable Housing Fund (AHF) to deliver an 100% Affordable scheme is £330K per unit, however, following approval of the OBC, the Council has secured an extra £300K for the scheme through the GLA funding 'Homes for Londoners: 2016-2021' Programme. The impact of additional external funding will be reviewed as the scheme progresses and reflected in the next iteration of the Capital Strategy, with the aim of maintaining a cost neutral scheme.
- 3.7.5 It was concluded from all of the above exercises, that a 100% affordable scheme with a ground floor community use is the preferred option as it delivers the greatest amount of affordable housing, which also increases the community benefit alongside the provision of a community space. It was also anticipated that the Planning Department would deem this the most acceptable option, as no private units are included therefore responding to demand in the borough for affordable housing.

### **3.8 Public Consultation**

- 3.8.1 In addition to the above, the scheme has been subject to an intense consultation process with the public and key stakeholders which has also assisted in the recommendation of the preferred option. The following stages of consultation involving the local community were undertaken:
- Stage 1 – Survey of development options (August - September 2018) – Initial views of residents and stakeholders were sought on proposed options for development including a wholly residential scheme.
  - Stage 2 – First public consultation events (October 2018) – The second stage of public consultation involved two consultation events held at Westminster University which sought additional public opinions on the early stages of the preferred wholly residential scheme and an alternative mixed-use scheme incorporating a community use.
  - Stage 3 – Second public consultation events (June 2019) – The third stage of public consultation involved two consultation events held at Westminster University Marylebone Campus which sought public opinions on the revised proposals for a mixed-use development incorporating a community use.
- 3.8.2 All of the above stages demonstrated that there were clear differences in opinion regarding the future of the site with some supporting the fully residential scheme which was presented in October whilst others stated that a community use needed to be provided as part of the scheme. Following the October events, a group called Save Our Space submitted a petition asking for the Council to respect the status of the site as Protected Open Space and return it to a kickabout space. This petition reached circa 800 signatures.

3.8.3 Following full consideration of the petition and all of the feedback from the events, it was considered that there are clear advantages to assess development opportunities on this site as, on balance, it is considered that the potential benefits of the scheme, notably the delivery of new homes including affordable homes, may substantially outweigh the policy conflict with regards to protecting open space.

3.8.4 After analysing all of the feedback from the public, it was felt that in order to create a balanced scheme, deliver affordable housing and maximise community benefit then the preferred option should include a community use and 100% affordable housing.

3.8.5 Following design development, and public consultation, Cabinet Member approval is now required to confirm the preferred option for the development which is ground floor community use with 100% affordable housing, in the form of 14 intermediate units.

### 3.9 Community Use

As stated above the planning permission seeks for a range of D1 uses at ground floor level including a nursery, crèche, public hall or exhibition hall. The preferred D1 community use is a nursery however, a flexible permission is sought so that an alternative community facility can be provided if a nursery operator cannot be secured. Therefore, a final decision will be required following the planning decision to confirm the community use on the ground floor.

### 3.10 Delivery Option

The following Delivery Options have been considered:

- Direct Development: Council self-delivers via a design and build contract
- Development Partner: Council enters into an agreement with a development partner

Again, the project team tested these against the objectives of the project and Critical Success Factors.

Option	Option 2: Direct Development	Option 3: Development Partner
Provide additional housing of any tenure	✓ ✓	✓ ✓
Provide affordable housing	✓ ✓ ✓	✓ ✓
Provide landscaping improvements	✓ ✓ ✓	✓✓✓
Provide community benefit as part of the scheme	✓✓✓	✓✓
Scheme acceptable by Planning Department	✓ ✓ ✓	✓ ✓ ✓
<b>Critical Success Factors</b>		
Strategic fit	✓ ✓ ✓	✓ ✓
Value for money	✓ ✓ ✓	✓ ✓

Deliverable	✓ ✓	✓ ✓✓
Affordable	✓ ✓	✓ ✓✓
Supply: Capacity/Capability	✓ ✓✓	✓
<b>Score</b>	<b>27</b>	<b>23</b>
<b>Conclusion</b>	<b>Preferred Option</b>	<b>Dismiss</b>

- 3.11 In terms of the CSFs, Option 2 scores highly on strategic fit and value for money as it is being delivered by WCC directly. It is however marked down on deliverability and affordability, as it requires a higher level of WCC resource and may rely on additional funding, which has not necessarily been allocated to this site. Nonetheless, this option permits WCC to take full control over the design and delivery of the development.
- 3.12 With regard to the Development Partner (Option 3), this option scores lower on value for money and affordability, as any developer would look to make a financial gain from the project. The option also scores low on a strategic fit as more private units would need to be delivered in order to increase the profit on cost to a standard developer rate of 20%. It is also deemed that there would be a lack of interest from development partners for a scheme of this scale and level of private housing.
- 3.13 The Project Team have also held detailed workshops with Development, Construction & the Cost Consultant to scope out the potential contractor procurement routes. Following this, based on the scale and nature of the development, along with the current pipeline of projects in development and construction, it is suggested that this site is procured as a single stage design and build contract.
- 3.14 Under a design and build arrangement the contractor is responsible for completing the design and for constructing the project, in return for a lump sum price. The contractor may use in-house resources to complete the design or he may sub-contract this to one or more professional firms whilst retaining control (may be instructed to take over the Client's designers). The contractor may be required to adopt the Client's design to provide single point design responsibility. The project is usually tendered in competition. The Client's requirements must be clear and well defined as to performance/quality specifications for important requirements before entering into a contract.
- 3.15 Prior to final confirmation of contractor procurement, further market analysis will be carried out. Final confirmation will be sought via the Gate 1 process, including details of tendering process (framework, OJEU etc.)
- 3.16 With regards to Value for Money, following an agreed procurement strategy, the council will enter into a design and build contract that will transfer risk to the contractor. In order to minimise commercial risk, due-diligence will be carried out on the tender shortlist.
- 3.17 A single stage tender has been recommended as the current multi-disciplinary team is instructed until the end of Stage 4, which will be completed prior to the issue of the tender. It is therefore felt that there will be enough information and design work available in order for bidders to calculate a realistic price in there tender. In addition to this the project is relatively small in size which is better suited to a single stage tender.

## 4. Background, including Policy Context

4.1 The Luxborough Street kick about site is located in the Marylebone High Street Ward on the western side of Luxborough Street, between Marylebone Road to the north and Paddington Street to the south. The site is a short walk to Marylebone High Street, a busy retail/commercial centre with a variety of local amenities. The site is bounded by Newcastle House to the south, Luxborough Tower to the north and the public open space of Paddington Street Gardens to the west. The existing kick about site was developed as part of Luxborough Tower in the early 1970s to provide outdoor play space for residents. The site is owned by Westminster City Council and is included as amenity space in the leases of some of the Luxborough Tower residents. Originally, the site was for the sole use of the Luxborough Tower residents however, there is a history of it being used informally by the wider community.

4.2 The site was locked in 2013 at the request of the Luxborough Tower Residents Association due to reports of anti-social behaviour. Planning permission for a mixed-use scheme, consisting of a ground floor library and nine residential units was granted in 2014. However, due to a change of requirements the approved scheme did not proceed, the site has been hoarded up ever since.



*Plan identifying existing site  
Existing Kick about Site – Hatched Red Area*

4.3 In August 2018, ECD Architects were appointed as the lead for the Multi-Disciplinary Design Team on the Luxborough Street project. Their initial task was to complete a feasibility report on the development options outlined in the Cabinet Member Report (approved in 2017) which included:

- Public medical centre with private residential above
- Public medical centre with mixed tenure residential above
- Mixed tenure residential
- Affordable residential

4.4 Rather than limit the community use to a public medical centre on the ground floor, the WCC Project Team decided to revert to the planning policy designation of 'D1 Community Use', thereby allowing a wider range of options to be considered.

4.5 Following consultation with various departments internally it has been concluded that the most beneficial use for the ground floor would be a nursery. The Project Team had an initial discussion with Children's Services and the Early Years team who suggested they would welcome a nursery in the area whilst also stating there is currently limited need for funded spaces in the Marylebone area. Therefore, the Project Team instructed Knight Frank to undertake market research in which they concluded there is demand for a nursery space in the Marylebone area from a commercial perspective.

4.6 If planning permission is gained, the development will be taken to the market to try and obtain a nursery operator, however, a flexible D1 Community Use permission is sought so that an alternative community facility can be provided if a nursery operator cannot be secured.

#### 4.7 Rights of Light

4.7.1 The Council have instructed a ROL surveyor to undertake due diligence on where negotiations were left with various residents on the 2014 scheme in addition to any new negotiations. The Council recognises that in respect of third-party rights of light which exist and to which an entitlement is proved, the Council will be liable to pay statutory compensation and will pursue a settlement strategy to ensure that any claimants receive adequate statutory compensation.

4.7.2 Negotiations with residents will start to be undertaken once the scheme is submitted to planning. If, however, residents are opposed to negotiation or do not respond after a reasonable amount of attempts by the Council to negotiate, the Council will consider using its powers as a Local Authority to appropriate the land for planning purposes under Section 122 of the Local Government Act 1972.

#### 4.8 Luxborough Tower Gardens

4.8.1 A commitment was made by the Council to Luxborough Tower residents to upgrade the landscaped area of the estate. The Design team have worked closely with the Residents Association to replicate the scheme that was designed previously. The proposed scheme was presented at both the October and June consultation events where residents of Luxborough Tower were invited to come and hear about both the development proposal and the landscape scheme. The landscape architect attended the events to answer any questions residents may have.

4.8.2 It is worth noting that this commitment was made previously to ensure smooth negotiations with the Luxborough Tower leaseholders who will need to enter in to a Deed of Variation to remove the kickabout site from their leases. It is still a risk that, regardless of the landscaping upgrades, some residents could potentially cause further issues with this process.

## 5. Financial Implications

- 5.1 The Capital Strategy includes a total budget allocation of £14.3m for Luxborough within the General Fund, of which authorisation has been given to spend up to £2.262m to reach full business case. To the end of 2018/19 the project has spent £1.360m. No further approval to spend is required as a result of this report.
- 5.2 The outline business case (OBC) for Luxborough was presented to the Capital Review Group (CRG) in May 2019. CRG recommended option 2 was progressed, a 100% affordable scheme with D1 use on the ground floor. Option 2 has a net capital cost of £5.9m and CRG recommended an allocation of £4.6m of Affordable Housing Fund (AHF) to fund this deficit, the equivalent of £330k per a unit.
- 5.3 The AHF budget currently includes an unapproved allocation of £4.6m for the Luxborough scheme. The table below shows that the net capital cost of Luxborough, once AHF is applied, is £1.3m, an underspend against current budget of £13.1m.

Net Capital Cost	Option 2 £'000
Capital Cost	7,186
Contingency	1,209
<b>Gross Capital Cost</b>	<b>8,395</b>
Intermediate sales	(2,520)
<b>Net Capital Cost</b>	<b>5,875</b>
AHF Contribution	(4,620)
<b>Total Net cost</b>	<b>1,255</b>
Capital Budget	14,346
<b>(under)/Over Budget</b>	<b>(13,091)</b>

- 5.4 The project will generate an ongoing revenue stream from the ground floor D1 use, which will be used to meet the 60k per annum financing costs arising from the projected capital deficit.
- 5.5 The land for the development is currently held on the HRA balance sheet as part of the Luxborough tower asset. As the development will be delivered through the general fund the asset will be appropriated, transferring the asset and the associated debt from the HRA to the GF. A red book valuation has been undertaken by Knight Frank in April 2019. Based on a scheme with 50% affordable housing, the land was valued at £3.3m. Another red book valuation for the site will need to be undertaken on the preferred option, if planning approval is achieved.
- 5.6 Following approval of the OBC the Council has secured GLA funding from the 'Homes for Londoners: 2016-2021' Programme for which Luxborough qualifies for £300K additional funding. The impact of additional external funding will be reviewed as the scheme progresses and reflected in the next iteration of the Capital Strategy, with the aim of maintaining a cost neutral scheme.

**Timothy Hampton – Finance. 24/05/2019**

## **6. Legal Implications**

The decisions in the report have been taken based on the following powers:

### **6.1 General Powers**

The decisions in these reports are being undertaken under Section (1) of the Localism Act 2011, the power to do anything that individuals may generally do (the general power of competence). The Council also has the power under Section 111 of the Local Government Act 1972 to do anything, which is calculated to facilitate or is conducive or incidental to the discharge of any of its functions.

### **6.2 Leaseholders and Tenants**

The site falls within the estate boundaries of existing council leaseholders and tenants in Luxborough Tower, forming part of their amenity space.

The Council has the ability as the landowner within the Exceptions and Reservations Schedule of the leases for Luxborough Tower to vary the boundaries of the Estate.

The Council will need to write to the leaseholders informing them of the fact that the estate boundaries will change and advising them of the fact that their Leases will have to be varied accordingly.

Pursuant to section 105 of the Housing Act 1985, the Council is required to consult with Secured Tenants on matters that affect housing management. The Council should carry out all consultation in accordance with its usual section 105 arrangements, and must ensure that the section 105 consultations are a continuing process that are considered and implemented throughout the course of the project.

**Aylin Kemal – Legal. 19.08.2019**

## **7. Staffing Implications**

7.1 This project has been and will continue to be managed and delivered by the Development team in Growth, Planning and Housing. If planning consent is achieved, the Development team will be handing over to the Delivery team. Sufficient capacity exists within both teams for this project.

## **8. Consultation**

### **8.1 Pre-Engagement**

8.1.1 In early Summer 2018, an introductory meeting was held with the Marylebone High Street Ward Councillors to introduce them to the project team. Following this, an introductory meeting was also held with the Luxborough Tower Residents Association as a key stakeholder.

8.1.2 In August 2018, the council undertook a pre-engagement exercise in order to understand residents' views on the different development options for the site. Residents received a letter explaining that the Council was looking at the site as a potential development opportunity again, and included a survey asking for comments on two development options:

- 100% residential development.
- Ground floor community use with residential above

8.1.3 Key stakeholders and Ward Councillors received the information and survey via email. A webpage and email address was created for the project and the survey could be filled in online as well as sent

in by post. Feedback from the surveys was analysed and fed in to the decision on whether to progress a fully residential or community use scheme.

## 8.2 Engagement Events

8.2.1 Following the completion of the feasibility study, it was decided that a fully residential scheme should be taken to a pre-application meeting with the planners, and then to public consultation.

8.2.2 Ward Councillors and the Luxborough Tower Residents Association were met with again separately to inform them of what would be presented at the events.

8.2.3 The first set of engagement events were held on 27 and 31 October 2018 at Westminster University. The purpose of these events was to provide an opportunity for the public and key stakeholders to see the initial design proposals for the Luxborough Street development and talk through questions and feedback with members of the project team and architects. A sign in sheet and comment cards were available for attendees to leave feedback which were later analysed.

8.2.4 Following the public exhibition, a copy of the exhibition boards was published online where residents could leave comments if they were not able to attend the events. The Luxborough email address was continually monitored for any queries or comments that were sent regarding the scheme.

8.2.5 Feedback from the events and online comments were analysed. They found that there was a mixed response to the initial proposal. There was some support for the development, in particular a fully residential scheme. However, others were opposed, believing that the space should be preserved for community use. These views were considered when making a decision on how to progress the project.

## 8.3 Petition

Following public consultation on the proposed residential development, a public petition was raised with the following request:

*“not proceed with any proposal to build on the Luxborough Tower playground, immediately adjacent to Luxborough Street W1, because it is listed as a Protected Open Space in the Council’s City Plan.”*

At close, the petition received 778 signatures. A cabinet debate and formal response to the petition was submitted at full council in January 2019 by Councillor Karen Scarborough. The group behind the petition, ‘Luxborough Save Our Site’, has been active for a number of years and previously raised a petition against development plans for the site in 2009.

A formal response to the petition was published on the council’s website on 15 February 2019 and went to Cabinet on 25 February 2019 in the form of a Cabinet Member Report which was also published online (see Appendix 9 for full report).

## 8.4 Formal Consultation Events

8.4.1 Following analysis of this feedback from the first engagement round, along with the feedback from the planning department, it was decided that the scheme should include ground floor community use, with the most likely use being a nursery. For the purpose of the consultation events, the exhibition boards explained how the most likely use will be a nursery but to allow for flexibility in the planning submission, the ground floor will be referenced as “D1 Community Use”.

8.4.2 A second round of consultation events was held in June 2019. Meetings took place with key stakeholder groups before the consultation events. The Council has complied with Section 105 of the Housing Act 1985.

8.4.3 The public consultation took place on Tuesday 25<sup>th</sup> June and Thursday 27<sup>th</sup> June 2019 in Westminster University, Marylebone Campus.

8.4.4 The design team reviewed the feedback received at the consultation(s) from stakeholders and residents, and where possible incorporated it into the design before planning submission. Ward Councillors were updated on the feedback received via a briefing note.

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

*NB: For individual Cabinet Member reports only*

For completion by the **Cabinet Member** for Finance, Property and Regeneration

**Declaration of Interest**

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

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

NAME: \_\_\_\_\_

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 recommendations in the report entitled **Luxborough Street Development, London, W1U** and reject any alternative options which are referred to but not recommended.

Signed .....

Councillor Rachael Robathan, Cabinet Member for Finance, Property and Regeneration

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:

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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, the Executive Director of Finance and Resources, and, if there are human resources implications, the Director of People Services (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. Resources Implications**
- 2. Business Plan Implications**
- 3. Risk Management Implications**
- 4. Health and Wellbeing Impact Assessment including Health and Safety Implications**
- 5. Crime and Disorder Implications**
- 6. Impact on the Environment**
- 7. Equalities Implications**
- 8. Staffing Implications – see paragraph 4.8, 4.9 and 4.10 of guide**
- 9. Human Rights Implications**
- 10. Energy Measure Implications**
- 11. Communications Implications**

Note to report authors: If there are particularly significant implications in any of the above categories these should be moved to the main body of the report.