1. SUMMARY

1.1 The existing borough wide selective licensing scheme for privately rented property came into force on 1 April 2015 and is due to expire on 31 March 2020. Under the scheme, most privately rented homes are required to be licensed in order to be legally let out. Where a property licence is granted, the Licence Holder is required to comply with a set of conditions relating to the letting and management of the property.
1.2 On 13 September 2018, Cabinet agreed for work to be undertaken to evaluate the impact of the existing licensing scheme and to identify the potential benefits of a further designation.

1.3 On 17 January 2019, Cabinet agreed to consult in respect of two proposed private rented property licensing schemes, informed by its established evidence base and government guidance relating to the designation of discretionary licensing schemes, as follows:

- A selective licensing designation covering 18 of the borough’s wards, but excluding Hatch Lane and Endlebury, which would apply to eligible dwellings occupied by a single-family household or by two unrelated adults.
- A borough wide additional licensing designation which would apply to eligible Houses in Multiple Occupation (HMOs) whose separate households shared one of more standard amenities.

1.4 This report confirms the outcomes of the completed consultation exercise and makes recommendations in relation to designation of property licensing schemes beyond the expiry of the existing selective licensing scheme on 31 March 2020.

1.5 In the event that Cabinet agrees to the proposed designation of a further selective licensing Scheme this is subject to ratification from the Secretary of State.

2. RECOMMENDATIONS

Cabinet is recommended to:

2.1 Consider the outcome of the consultation process detailed in the Consultation Report (May 2019) [Appendix 1], in particular the representations received and the Council’s consideration of, and response to, these representations [Appendix 2].

2.2 Note that the Consultation Evidence Report [Appendix 3] highlights the scale of problems relating to poor housing conditions and anti-social behaviour (ASB) in the private rented sector, identifies the objectives that a selective licensing designation would help the Council achieve and possible alternatives to such a designation.

2.3 Note that the Consultation Evidence Report [Appendix 3] also highlights the scale of problems relating to poorly managed HMOs in the private rented sector, identifies the objectives that an additional licensing designation would help the Council achieve and possible alternatives to such a designation.

2.4 Upon consideration of the matters at 2.1 and 2.2 and using its powers under s.80 Housing Act 2004, agree to the designation of 18 wards (excluding Hatch Lane and Endlebury) of Waltham Forest as a selective licensing area from 1st April 2020 as delineated and edged red on the map at Appendix 4.
2.5 Upon consideration of the matters at 2.1 and 2.3 and using its powers under s.56 Housing Act 2004, agree to the borough wide designation of Waltham Forest as an additional HMO licensing area from 1st April 2020 as delineated and edged red on the map at Appendix 5.

2.6 Agree the proposed scheme objectives as detailed in Appendix 6.

2.7 Agree to the proposed fee structure for licence applications made under the selective and additional licensing schemes at Appendix 7.

2.8 Agree the proposed licence conditions that would accompany any granted selective licence at Appendix 8.

2.9 Agree the proposed licence conditions that would accompany any granted additional licence at Appendix 9.

2.10 Agree the policy regarding the granting of full-term licences under any new licensing designations and the granting or variation of licences under the existing selective licensing scheme at Appendix 10.

2.11 Subject to Cabinet agreeing 2.4 that Cabinet delegate to the Lead Member for Housing and the Strategic Director of Neighbourhoods and Commercial Services responsibility for agreeing the final document requesting confirmation of the selective licensing designation from the Ministry of Housing, Communities and Local Government (MHCLG) in consultation with the Director of Governance and Law.

2.12 That Cabinet delegate to the Lead Member for Housing and the Strategic Director of Neighbourhoods and Commercial Services authority to agree changes to the proposed implementation of the schemes where necessary and to ensure that all statutory notifications are carried out in the prescribed manner for the designations and to take all necessary steps to provide for the operational delivery of any licensing schemes agreed by Cabinet including but not limited to the procurement of services subject to the Council’s Contract Procedure Rules (including authority to alter the fees structure if necessary).

2.13 Delegate to the Lead Member for Housing and the Strategic Director of Neighbourhoods and Commercial Services responsibility for determining whether to consult on a possible further designation of two wards (Hatch Lane and Endlebury) under the criteria of ASB, subject to a review of the evidence and in consultation with the Director of Governance and Law.

3. PROPOSALS
[all figures quoted are from the Consultation Report [Appendix 1] unless otherwise stated]

Selective Licensing designation

3.1 Through the statutory consultation, the Council proposed a selective licensing designation that covered 18 of the 20 wards in the borough, with the exception of Hatch Lane and Endlebury wards. The evidence base indicated that the proposed designation area has a high
proportion of privately rented properties (above the national average of approximately 19%) and is experiencing:

- A significant and persistent problem caused by anti-social behaviour;
- Poor property conditions;

3.2 54% of residents/tenants agreed with the Council’s proposal to reintroduce selective licensing in Waltham Forest. 28% landlords/agents agreed with this proposal and 61% disagreed.

3.3 Overall, 51% of respondents said there would be a negative impact on the condition and management of privately rented properties in Waltham Forest, if the current scheme stopped, and 11% said there would be a positive impact. Overall, 51% of respondents said there would be a negative impact on anti-social behaviour associated with privately rented properties in Waltham Forest, if the current scheme stopped, and 10% said there would be a positive impact.

3.4 Most of those that agree with the introduction of a selective licensing scheme, agree with the proposal to include 18 of the 20 wards - 67% of those that agree with the proposal said it is appropriate to include 18 of the 20 wards, 1% said less wards and 17% of those that agree with the proposal said it should include more wards.

3.5 It is not proposed to change the area covered by the proposed selective licensing scheme following the consultation exercise. A significant number of respondents did indicate that a selective licensing designation should include more wards and, subject to approval, officers carry out a further consultation exercise should a review of the available evidence indicate that a separate designation covering Hatch Lane and Endlebury wards be appropriate.

Additional HMO Licensing

3.6 Through the statutory consultation, the Council proposed a borough wide additional licensing designation that would apply to most HMOs that did not fall within the scope of mandatory HMO licensing where one or more standard amenities are shared by more than one household. The evidence base indicated that there are poor property conditions associated with HMOs in Waltham Forest. There are also significant and persistent problems caused by anti-social behaviour specifically related to HMO properties and evidence that HMO properties place high demands on Council services.

3.7 Overall, 57% of respondents agree with the council’s proposal to introduce additional licensing for Houses in Multiple Occupation (HMOs) in all of Waltham Forest to regulate property conditions and management in HMOs and help tackle anti-social behaviour. 23% disagree. 59% of tenants/residents agree and 18% disagree. This compares with 51% of landlords/agents that agree and 38% that disagree with the proposal to introduce additional licensing.

3.8 Most of those that agree with the introduction of an additional licensing scheme, agree with the proposal for it to cover all of Waltham Forest -
84% of those that agree with the proposal said it is appropriate to cover all of Waltham Forest and 1% said less wards should be included.

3.9 It is not proposed to change the area covered by the proposed additional licensing scheme following the consultation exercise.

Objectives of the proposed schemes and possible alternatives to licensing

3.10 When considering whether to make an additional or selective licensing designation a local housing authority must identify the objective or objectives that a designation will help it to achieve. The proposed scheme objectives (alongside outcomes and outputs) formed part of the consultation and can be found in Appendix 6.

3.11 The consultation evidence report [Appendix 3] detailed a number of other courses of action or alternatives to selective and additional licensing that the Council had considered, but did not believe that, individually or collectively, provided an effective, or as effective a, means of tackling ASB and poor housing conditions in the borough, or of delivering the scale of improvement required in the Private Rented Sector (PRS). A summary of these alternatives is:

- Use of Part 1 Housing Act powers (Housing Health and Safety Rating System)
- Voluntary accreditation schemes for landlords
- Reliance on enforcement action using civil penalty or prosecution powers
- Use of Improvement Grants to raise standards
- Use of ASB enforcement powers

3.12 Overall, 22% of all respondents said the council should consider alternatives to a selective licensing scheme to regulate private rented property conditions and management effectively and help tackle anti-social behaviour. 12% of tenants/residents said the council should consider alternatives, compared with 54% of landlords/agents.

3.13 201 respondents that said the council should consider alternatives provided comments although about a tenth of these just reiterated that they did not support the introduction of selective licensing. Of the remaining points made, some related to alternatives that had already been considered by the Council and referenced in the consultation evidence report (such as voluntary accreditation and use of other enforcement powers) and others expressed views regarding the proper enforcement of a licensing scheme, as opposed to suggesting an alternative to a selective licensing scheme.

3.14 Overall, 17% of all respondents said the council should consider alternatives to an additional licensing scheme to regulate property conditions and management effectively in HMOs and help tackle anti-social behaviour. 10% of tenants/residents said the council should consider alternatives, compared with 38% of landlords/agents.
3.15 141 respondents that said the council should consider alternatives, provided comments. Approximately a tenth of these comments simply reiterated that they did not support the introduction of additional licensing. The main comments were similar in nature and volume to those about selective licensing.

3.16 Details of the representations received in respect of alternatives to selective licensing and additional licensing schemes, and a response to those representations, is provided in Appendix 2.

3.17 It is considered that no alternatives were identified through the consultation process that would, individually or collectively, be capable of delivering the scheme objectives that the Council would deliver through the operation of large scale selective and additional licensing schemes.

Licence Fee Structure

3.18 Through the statutory consultation, the Council confirmed that it was intending to charge a licence fee in respect of an application to licence a property and that its proposed fees had been calculated on the basis that the schemes would be cost-neutral to the Council, with licence fees covering the Council’s costs of administering the schemes and meeting the scheme objectives.

3.19 The proposed fee structure included an ‘early bird’ discounted licence fee, a discounted licence fee for new rental properties of EPC C and above that became available to rent after the end of the early bird period and a discount on the processing element of the licence fee for the second, third etc flat within a block under common ownership and management control.

3.20 Respondents were also asked their views in relation to the Council’s proposal to continue our current policy to not to require the payment of a single fee at the point at which we decide to grant or refuse the licence application (as opposed to splitting the fee into processing and wider management/enforcement elements and taking as 2 separate payments).

3.21 Most tenants/residents and landlords/agents agreed with the proposed approach to licence fees. Overall, 75% agree that landlords should receive an early bird discount and 7% disagree. 71% of tenants/residents agree and 7% disagree (about half of these do not believe that landlords should receive any discount). This compares to 86% of landlords/agents that agree and 8% that disagree (almost all of these do not believe that licensing should be introduced).

3.22 Overall, 66% agree that landlords should receive a discount for new rental properties with a high energy rating and 12% disagreed.

3.23 Overall, 58% agree that landlords should receive a discount where they let multiple flats within the same block and 19% disagreed.
3.24 Overall, 59% of respondents agreed with the proposed approach to require payment of the licence fee at the point the licence application is decided. 23% disagreed.

3.25 199 respondents that said they disagreed with any of the approaches to fees and discounts, provided comments. These comments, which can be viewed in Appendix 1, expressed a range of views from those respondents who considered that the proposed fees were too high and discounts too low, to those who expressed the opposite view.

3.26 In considering the consultation responses, the Council had regard to representations made by Almhouses/Charities providing accommodation for elderly residents at affordable rents that these organisations should be exempted from the requirement to licence their rented homes. As part of the Council’s equality impact assessment of introducing the proposed scheme, the Council has recognised the work of such charitable organisations in providing accommodation to elderly persons. It is therefore proposed to offer a further discount against the licence fee to bring the cost of a selective licence down to £300 for the first dwelling in a block and £200 for any subsequent licence in the same building owned and controlled by eligible organisations.

3.27 Following the consultation exercise, the revised proposed fee structure is:

<table>
<thead>
<tr>
<th>Type of Licence</th>
<th>Total fee payable (without discount)</th>
<th>Discounted fee (Early Bird or EPC)</th>
<th>Discounted fee Eligible charities</th>
<th>Additional discount for multiple properties</th>
</tr>
</thead>
<tbody>
<tr>
<td>Selective Licence</td>
<td>£700</td>
<td>£450</td>
<td>£300</td>
<td>£100</td>
</tr>
<tr>
<td>Additional HMO licence</td>
<td>£1,000</td>
<td>£750</td>
<td>N/A</td>
<td>£100</td>
</tr>
</tbody>
</table>

The Council’s licence fee structure compares favourably with the fees charged by other councils with large scale licensing schemes.

<table>
<thead>
<tr>
<th>London Borough</th>
<th>Selective Licence (without discount)</th>
<th>Additional Licence (without discount)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waltham Forest</td>
<td>£700</td>
<td>£1,000</td>
</tr>
<tr>
<td>Barking and Dagenham</td>
<td>£900</td>
<td>£700*</td>
</tr>
<tr>
<td>Croydon</td>
<td>£750</td>
<td>N/A</td>
</tr>
<tr>
<td>Newham</td>
<td>£750</td>
<td>£1,250</td>
</tr>
<tr>
<td>Redbridge</td>
<td>£604</td>
<td>£1,198 to £1,864</td>
</tr>
<tr>
<td>Havering</td>
<td>N/A</td>
<td>£900</td>
</tr>
</tbody>
</table>

*Barking & Dagenham’s additional licensing scheme is due to end on 31/8/2019
Licence Conditions

3.28 Through the statutory consultation, the Council set out its proposed licence conditions to accompany a granted property licence, placing obligations on the Licence Holder in relation to the letting and management of the property.

3.29 Overall, 81% of respondents said the selective licence conditions were clear and understandable and 83% of respondents said the additional licence conditions were clear and understandable.

3.30 122 respondents that said that the selective licence conditions were not clear and understandable, provided comments as did 79 respondents in respect of the additional licensing conditions.

3.31 As a result of the consultation representations received, the Council has deleted one selective licensing condition and amended 7 more. It has also deleted one additional licensing condition and amended 8 more. The revised proposed conditions are at Appendix 8 [Selective Licensing] and Appendix 9 [Additional Licensing].

Duration of a granted licence

3.32 Although not part of the consultation exercise, some respondents raised the issue of the duration of a granted selective licence. Current policy under the existing selective licensing scheme has been to grant ‘full-term’ property licences that have an end date of 31 March 2020, to coincide with the expiry of the existing scheme.

3.33 Counsel has advised that a local authority may grant a licence whose term ‘over-hangs’ a licensing designation. The Council has considered this advice, both in terms of the operation of any new discretionary schemes and its existing selective licensing scheme.

3.34 A policy governing the term of ‘full-term’ licences is at Appendix 10. In summary, and subject to Cabinet approval:

- Licences granted under a future selective licensing or additional licensing scheme will be granted for a 5-year period (assuming that there were no contra-indications that meant that a reduced term licence was warranted).
- Subject to Cabinet agreeing the proposed selective licensing designation, a full-term licence granted under the existing scheme in relation to a non-HMO property located in the area covered by the proposed designation will be granted for a period of 5 years.
- Subject to Cabinet agreeing the proposed selective licensing designation, licence holders of non-HMO properties will be given the opportunity to apply for the variation of a full-term licence due to expire on 31 March 2020 to run for a total 5-year period. Such variation, if granted, would be on the basis that the landlord would not be eligible to apply for a new licence under a new designation during the early bird period.
Scheme exemptions

3.35 The national exemptions (Housing Act 2004) will apply to both schemes.

4. OPTIONS & ALTERNATIVES CONSIDERED

4.1 The Council could decide to only designate an additional licensing scheme and not a selective licensing scheme. The alternatives to a selective licensing scheme were investigated and put forward as part of the consultation. The alternative powers would not deliver the necessary outcomes that selective licensing can.

4.2 The Council could decide to only put forward an 18-ward selective licensing scheme and not pursue the borough wide additional licensing scheme. This would have the effect of leaving a number of small HMOs unlicensed or regulated through less appropriate selective licensing regulations. These properties are some of the most poorly managed and make the most demands on council services.

4.3 The Council could decide not to adopt either the additional HMO licensing scheme or seek Secretary of State approval for any further selective licensing scheme. Such a decision would leave only mandatory HMO licensing as the means of regulatory enforcement of housing management of properties that are HMOs.

4.4 In relation to the setting of fees Cabinet could opt not to levy a fee on a cost recovery basis as proposed. Such a decision would mean that alternative funding streams for the proposed designations would need to be identified.

5. SUSTAINABLE COMMUNITY STRATEGY PRIORITIES (AND OTHER NATIONAL OR LOCAL POLICIES OR STRATEGIES)

5.1 The council has a number of priorities and strategies that selective licensing complements including Creating Futures, the Housing Strategies, Clean, Green and Safe and the ASB strategy, some of the key principles are listed below:

- Ensuring a decent roof over residents’ heads
- Keep your neighbourhood clean and safe
- Support affordable housing for everyone’s needs
- Reducing ASB
- Improving the quality and safety of private rented property

Work has taken place to ensure that these strategies demonstrate the significant role PRS has within Waltham Forest and how licensing of the sector compliments and creates a joined-up approach.

5.2 Selective licensing also supports/works in line with national polices, including the new Homes (Fitness for Human Habitation) Act 2018,
whereby every tenant has the right to live in a decent home which means that they are safe, healthy and free from things that could cause serious harm.

6. CONSULTATION

6.1 Consultation on the proposed additional and selective licensing schemes took place over 12 weeks between 4 February and 29 April 2019. This exceeded the statutory requirement of 10 weeks.

6.2 The consultation had 2,415 responses compared to the 1,534 in 2015. There were responses from tenants, residents, landlords, neighbouring boroughs and external organisations. The full report can be found in Appendix 1.

6.3 The council has considered the representations made during the consultation and has made a number of changes, as outlined in Section 3 above. In addition, it will develop an enhanced programme of support for landlords and tenants in collaboration with landlord body associations.

A breakdown of representations and the council’s response to them can be found in Appendix 2.

7. IMPLICATIONS

7.1 Finance, Value for Money and Risk

7.1.1 Finance: The intention is that the scheme is self-financing over the five-year period it is in force. With this in mind, staffing costs and other running costs have been estimated and the licence fees set at a level which is estimated to cover these costs.

7.1.2 The forecast costs and income over the five-year period are as follows:

<table>
<thead>
<tr>
<th></th>
<th>Selective Licence</th>
<th>Additional HMO Licence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Staffing costs</td>
<td>£11,234,842</td>
<td>£1,488,597</td>
</tr>
<tr>
<td>Other running costs</td>
<td>£2,827,447</td>
<td>£405,349</td>
</tr>
<tr>
<td></td>
<td><strong>£14,062,289</strong></td>
<td><strong>£1,893,946</strong></td>
</tr>
<tr>
<td>Estimated income</td>
<td>£13,869,900</td>
<td>£1,854,100</td>
</tr>
<tr>
<td>(Under)/Over recovery</td>
<td>(£192,389)</td>
<td>(£39,846)</td>
</tr>
<tr>
<td>Under/Over Recovery %</td>
<td>-1.37%</td>
<td>-2.10%</td>
</tr>
</tbody>
</table>
7.1.3 Clearly, these are just estimates and if significant deficits were emerging, staffing levels could be flexed to bring the scheme back into balance. The overall budget will be managed to ensure a break-even position/every effort made to manage costs in the available budget.

7.1.4 Risk: There are two main risks

- Selective licensing not being confirmed in the timeline needed to ensure a smooth transition from the current scheme. Alternative plans will be developed post submission to mitigate this scenario, including legal advice for any licences that are varied.

- Selective licensing submission being rejected by the Secretary of State. Alternative plans will need to be developed post submission reviewing implications of an additional and mandatory scheme only and how this would be implemented.

7.2 Legal

7.2.1 The legal framework regarding selective licensing is found in Part 3 of the Housing Act 2004 which gives local authorities the discretionary power to introduce a scheme of selective licensing of privately rented properties in the whole or part of its area imposing conditions on landlords for minimum standards of management.

7.2.2 Section 80 of the Housing Act 2004 and the Selective Licensing of Houses (Additional Conditions) (England) Order 2015 sets out the criteria and considerations that the Council must be satisfied are met when considering designating a selective licensing area. Any scheme which would cover more than 20% of the Council’s geographical area or that would affect more than 20% of privately rented homes in their area as subject to selective licensing must have the approval of the Secretary of State of that designation. If the designation is confirmed by the Secretary of State it cannot come into force until the expiry of three months from the date of confirmation.

7.2.3 Under the Secretary of States’ General Approval 2015 any consultation undertaken must be for a minimum of 10 week with persons likely to be affected by the designation. The consultation took place over 12 weeks fulfilling the above requirements fully.

7.2.4 Before making any decision, Cabinet must have due regard to the responses received through the consultation undertaken and take those into account when making its’ decision. Cabinet must also have due regard to the matters set out in the ‘MHCLG Guidance: Selective licensing in the private rented sector – A guide for local authorities’ and in particular consider whether there are any other courses of action available to it that would achieve the same objective or objectives as any proposed schemes without the need for the designations to be made.

7.2.5 Under Part 2 of the Housing Act 2004 the Council may designate as subject to additional licensing a description of HMOs specified in the designation, if the requirements of Section 56 of that Act are met. The authority must consider that a significant proportion of the HMOs of
that description in the area are being managed sufficiently ineffectively as to give rise, or to be likely to give rise, to one or more particular problems either for those occupying the HMOs or for members of the public. Before making such a designation the authority must take reasonable steps to consult persons who are likely to be affected by the designation and consider any representations made as has been set out in the report.

7.2.6 Under Section 56(5) Cabinet must also have regard to any information regarding the extent to which any codes of practice approved under Section 233 of the Housing Act 2004 have been complied with by persons managing HMOs in the area in question. Cabinet must have due regard to the responses received through the consultation undertaken and take those into account when making its’ decision. Cabinet must also have considered whether there are any other courses of action available to them (of whatever nature) that might provide an effective method of dealing with the problem or problems in question and consider that making the designation will significantly assist them to deal with the problem or problems (whether or not they take any other course of action as well). There is no requirement to seek Secretary of State consent before implementing additional HMO licensing.

7.3 Equalities and Diversity

7.3.1 An Equality Impact Assessment (EIA) screening has taken place which demonstrated no protected characteristics are impacted negatively. The reintroduction of the scheme will bring benefits to socially and economically disadvantaged residents, this includes the high proportion of non-white/Irish and BAME who are more likely to rent as reported in the last census.

7.3.2 A full Equality Analysis (EA) was carried out before the scheme was initiated in 2015. The EA concluded that, overall, it anticipated that the introduction of selective licensing was likely to bring about benefits to groups with protected characteristics, particularly those who are disadvantaged and who have no alternative to renting in the private sector.

7.3.3 A policy is being developed with the rationale relating to discounts ensuring that no protected characteristic is disadvantaged.

7.4 Sustainability (including climate change, health, crime and disorder)

7.4.1 The objectives of the proposed scheme include improving property conditions and tackling/reducing ASB. This will be achieved through active and robust enforcement working in partnership with a range of internal and external agencies including the ASB team, the Police and UKBA. An improvement in property conditions is expected to lead to a general improvement in residents living conditions and their health.
7.4.2 A key aspiration of the Sustainable Communities Strategy is to create a more economically balanced population. A poorly managed private rented offer detracts from the look and feel of the street and this will put off residents of all sectors from remaining in the Borough, regardless of tenure. A good quality private rented offer will encourage residents to stay in Waltham Forest, in turn creating sustainable communities.

7.4.3 Selective licensing complements a range of council strategies and priorities including, the Housing Strategy, ASB strategy, Creating Futures Strategy and Clean, Green and Safe by reducing ASB and improving the quality and safety of private rented property:

7.4.4 The Council must ensure that the selective licensing scheme is consistent with the authority’s overall Housing Strategy and must seek to continue to adopt a co-ordinated approach in dealing with Homelessness, ASB and empty properties. The Council in its Housing Strategy is committed to working in partnership with the landlords and tenants of the PRS which represent the second highest tenure in the Borough.

7.5 Council Infrastructure

7.5.1 To ensure objectives of the scheme are fully met there will need to be an increase in headcount and with that associated costs. A full resource plan has been developed and a recruitment strategy will be developed to attract the appropriate quality of staff, specifically Environmental Health Officers, of which there is a regional shortage, to ensure a higher level of inspection of licensable properties and enforcement against non-compliant landlords.

7.5.2 Alongside this will be a review of current ways of working to ensure efficiency, effectiveness and agile ways of working as there is limited office space to accommodate the new team.

7.5.3 A change to the current IT system will be in place in the autumn 2019 for mandatory HMO licensing. The same system can be switched on for additional and selective licensing if approval is confirmed.

7.6 Brexit

7.6.1 The impact of Brexit is as yet unknown, but it is considered that it is not relevant to the decisions taken at this stage. However, the negotiations for Brexit, which are taking the majority of government time, could delay the confirmation decision by the Secretary of State, which would adversely affect the current timescale. This could mean that the current scheme ends before a new one could start. Alternative plans will be developed to mitigate this.

BACKGROUND INFORMATION (as defined by Local Government (Access to Information) Act 1985)

None.