

Slough Borough Council

Report To:	Cabinet
Date:	16 March 2026
Subject:	Ground Rent Estates 5 Ltd (GRE5) Business Plan
Lead Member:	Cllr Dexter Smith – Leader and Lead Member for Law and Governance, Strategy, Improvement and HR
Chief Officer:	Pat Hayes, Executive Director Property & Housing
Contact Officer:	Peter Hopkins, Director Property and Assets
Ward(s):	Herschel Park
Key Decision:	YES
Exempt:	NO, with the exception of Appendix 2 Exempt – Paragraph 3, Schedule 12A LGA 1972 - Information relating to the financial or business affairs of any particular person (including the authority holding that information) Exempt – Paragraph 5, Schedule 12A LGA 1972 - Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings
Decision Subject To Call In:	YES
Appendices:	Appendix 1 – Ground Rent Estate 5 Business Plan Appendix 2 - Ground Rent Estate 5 Finance and legal (Exempt) Appendix 3 – Ground Rent Estates 5 Exit Strategy (Exempt)

1. Summary and Recommendations

- 1.1 This report sets out an update on Ground Rent Estates 5 (GRE5) cladding remediation, structural and other works undertaken at Nova House and the business plan for 2026/27.
- 1.2 In 2018, the Council acquired all the shares of GRE5 Ltd due to concerns about the capacity of GRE5 to undertake the substantial remediation works required and concerns about the safety of residents. Following completion of the works, the Council, as Shareholder is considering its future strategy for the company.

1.3 Recommendations:

Cabinet is recommended to note that:

- a) The company accounts for 2024/25 are being prepared on a non-going concern basis, being audited and due for filing by 31 March 2026;
- b) The council has issued a letter of assurance on a non-going concern basis to provide continuing limited financial support from the Council as Shareholder for 24 months from the date of approval of the statutory financial statements for the year ended 31 March 2025; and
- c) The company Directors have prepared a non-going concern letter which aligns to a 24 month period and in accordance with the FRS 102 - The Financial Reporting Standard applicable in the UK and Republic of Ireland.

Recommend to Cabinet to approve:

- d) Approve the updated GRE5 Business Plan appended at Appendix 1 and confidential appendix 2 for 2026/27, noting the current estimate of the final financial exposure of the Council;
- e) Approve the confidential GRE5 Exit Strategy appended at Appendix 3 as amended in paragraphs 2.21 to 2.23;
- f) Approve a part loan write off of £4.000m and accumulated interest of £0.546m for 2024/25 and 2025/26; and
- g) Approve delegation to the Executive Director Corporate Resources in consultation with the Leader on behalf of the Shareholder, the authority to provide written consent to the passing of a Board resolution for the voluntary winding-up of the company.

Reason:

To ensure member oversight of the governance of GRE5 and to update members on the progress with works at Nova House and other matters relating to the Councils Shareholder Ownership of GRE5 Limited.

Commissioner Review

The Council's strategic intervention to acquire GRE5 shares and lead the remediation of the private housing block was undertaken with a significant risk profile, particularly concerning the recovery of costs from third parties and leaseholders. While the remediation of the block is complete and now meets the current safety standards, the Council remains exposed to financial recovery risks regarding expenditure incurred.

The establishment of a Right To Manage (RTM) management company and subsequent service management transfer, will necessitate a final accounting of residual liabilities, marking a shift from active project risk to long-term liability management as the residual

liability has now ultimately transferred to the Council for the works to the private residential building.

The 2026/27 Business Plan reflects the steps that will need to be taken in resolving any outstanding issues associated with the works, settling liabilities, arranging an orderly handover of the management of the building and implementing the exit strategy.

The accounts will be prepared on a non-going concern basis as the entity will cease trading. The Council must transparently report the true operating costs and thereafter the resulting losses associated to GRE5 following its closure. The extent of write-offs / provisions for losses after each of the reporting periods and for terminating the activities will need to be recognised and the impact on the Council's financial statements considered. This is a critical aspect of good financial governance.

Commissioners are content for this report to be considered.

Options considered

Option	Description
1. Do nothing, provide no company update or business plan	Do not provide a company update or approval of the annual business plan to the council as shareholder. Under the council's constitution (Part 3.5, table 3, 15), Cabinet is required to approve the annual business plan for companies. Under the council's constitution (Part 3.5, table 3), Cabinet Committee is to receive a report on the company's activities and performance, at least annually. This option is not recommended
2. Provide company update and recommend approval of the business plan, exit strategy and part loan and interest write off	This option allows elected members to scrutinise company performance, approve the business plan and to consider the future direction of the company. The company do not hold sufficient assets to repay the loan in and interest in full. This option is recommended

2. Report

Background

- 2.1 Ground Rent Estates 5 Limited ("GRE5") is a company which is 100% owned by Slough Borough Council (the Council). GRE5 owns the freehold of Nova House, a block of 68 apartments held on long leases in Slough town centre. The building was previously office accommodation and was converted to an apartment block in 2015 with additional floors added to the building.
- 2.2 In 2018, the Council purchased the Company for £1.00 due to concerns about the capacity and ability of the company, and its existing shareholders, to undertake the substantial remediation works required and concerns about the safety of residents.
- 2.3 GRE5 has legal obligations under the Building Safety Act 2022 due to Nova House being a high risk residential block. The Council owns 100% of the share capital of 455,001 ordinary shares of £1.00 each.

- 2.4 A scope of works and Development Agreement were agreed with Slough Urban Renewal (“SUR”) in 2021, and all Aluminium Composite Material (ACM) cladding was removed by the end of January 2022. However, the project was delayed due to covid restrictions and alongside additional building tests and surveys that were completed across 2020 to 2023 that identified a range of additional defects and technical issues.
- 2.5 Following the removal of the cladding, several structural issues were identified relating to the Spine Beam, bracing to the building, shims and column connections. For safety reasons, this resulted in the halt of the cladding replacement works paused whilst SUR and its building contractor, Morgan Sindall (with Structural engineers Arup), made assessments and provided additional remediation options for the structural issues. The structural issues would need to be remediated before the cladding and balconies could be replaced.
- 2.6 Works during 2022 focused on further investigations into the structural defects and design proposals for their remediation, this essential work delayed the project and caused unavoidable, further disruption, to the residents of Nova House. Although it is also noted that due to the removal of the cladding and safety measures in place, the building was made significantly safer from the risk of fire.

Current position – Cladding, Structural and Other building works

- 2.7 An update on the works and scope is included in the business plan. All building works are now at the end of Defects Liability period.
- 2.8 The sprinkler installation has been completed under a separate Building Contract; there remains a review of this contract by the new Directors of the Company. There are no anticipated further construction works to be undertaken as end of defects certification(s) has now been issued for all works but pending review of the sprinkler contract.
- 2.9 Subject to final payment of retentions and any outstanding fees there are no further anticipated unknown construction liabilities to the Company as the final account(s) have also been agreed. The responsibility for future maintenance of the building passes to the new Management Company, progress on which is set out later in this report.
- 2.10 The next table sets out the cumulative project (cost of sales) and administration costs to 31 March 2024, 2024/25, 2025/26 and 2026/27. A report to Cabinet in March 2023 estimated the project costs to be £28.4m with the final costs reported of £32.991m including sprinkler works. This report also provided Cabinet with details of the funding arrangements being a grant from Homes England and a loan facility agreement with the Council, as lender of up to £15.0m that maybe repayable by GRE5 out of the proceeds of the legal insurance claim.

	Cumulative costs as at 31/03/2024 £m	2024/25 £m	2025/26 £m	DRAFT 2026/27 £m	Total £m
Development contract and other building works	19.836	6.631	0.305	0.000	26.772
Technical / survey costs	0.457	0.125	0.013	0.000	0.596
Project management costs	0.120	0.133	0.047	0.000	0.300
Decant costs	0.354	0.001	0.000	0.000	0.354
Waking watch costs	2.093	0.135	0.029	0.000	2.257
Legal fees	1.961	0.031	0.005	0.012	2.010
Other costs	0.904	0.285	0.103	0.065	1.357
Total Costs	25.725	7.343	0.502	0.077	33.647

Right to Manage

- 2.11 On 21 March 2025, GRE5 was notified of a claim notice by the newly formed Nova House Right to Manage (RTM) Company in respect of Nova House outlining their intention to acquire the right to manage the building.
- 2.12 GRE5 undertook external legal advice who confirmed that the claim notice was valid and that from the 29 of July 2025 the new Nova House RTM company effectively transferring day-to-day management, maintenance, and service charge collection effective 30 July 2025.
- 2.13 The freehold of the asset remains with GRE5 Limited, along with responsibility for collecting limited annual ground rent which is not sufficient to enable GRE5 sufficient cashflow to meet liabilities.
- 2.14 By residents coming forward to take on the effective day to day management and Service Charge collection this has enabled though a positive opportunity to explore at pace as part of GRE5s exit strategy the new RTM company acquiring the freehold and facilitating the exit strategy.
- 2.15 Whilst the RTM transfer supports the GRE5 exit strategy, it has introduced transitional liabilities and governance challenges but has also allowed at the same time a reduction in operational time for the Directors post their appointment and due diligence undertaking negotiations with Homes England to maximise grant drawdown.
- 2.16 It should be recognised that without disposing of the freehold of the building the Council ultimately would continue to have to provide financial and officer support to the company to ensure financial stability.

Business Plan

- 2.17 An updated business plan has been considered by Company Board Directors and submitted to the Council as Shareholder for approval. The business plan covers the period 2026/27 (Appendix 1).
- 2.18 As part of the development of the Business Plan, the company has engaged with Leaseholders in accordance with the Building Safety Act in respect of recovery of due monies and will finalise the position on recoverability of the costs as part of the exit strategy. A formal update has been provided to Shareholder Board and then Cabinet once the company Directors have formalised the position.

2.19 The strategic aim of GRE5 was and remains to ensure that Nova House meets required fire and safety requirements and that tenants can safely live in the property without the need for ongoing interim measures to address the fire and structural risks. As the freeholder of Nova House, GRE5 also strives to provide an excellent service to tenants and leaseholders. However, during 2025 and since the completion of the works, the Tenants have made a successful application under the Right to Manage Process and formed a Management Company. The Tenant Company will now take responsibility for the Management of the Service Charge, upkeep of the structure of the Building, Cleaning Common Parts and Management of Complaints from other Leaseholders.

2.20 The Council notes that the strategic objectives remain relevant as follows but have been updated as noted:

- Tenant safety – always act to maximise tenant safety and minimise disruption to their living conditions; (Building works are now Practically Complete and in the Defects Liability Period, the day to day management of the building has passed to the Tenant Right to Manage Company and arrangement for an orderly transfer of responsibilities is in hand with the Directors of GRE5 Limited and their advisors.
- Building condition - ensure that Nova House meets all the requirements of the Fire Risk Assessment and the Building Safety Act; (A fire Risk Assessment was carried out in the Summer of 2025, attached, management for any improvements would now be the responsibility of the Management Company.)
- Service to tenants and leaseholders - ensure the management of the building takes place in an efficient and effective manner and any issues are communicated appropriately; (The responsibility for the day to day management of these activities now resides with the Right to Manage Company.)
- Stakeholder management - communicate with our stakeholders and keep them informed throughout each step of the remediation works of Nova House in a timely manner.
- Shareholder interest – protect the interest of the Council, as shareholder, and seek to maximise cost recovery through the legal process; (It has already been noted in previous reports that there will be based on current evidence a shortfall in the recovery of loans/interest made to GRE5 Limited by the Council)

Exit Strategy

2.21 The proposed exit strategy for GRE5 Limited, as detailed in the attached plan (Appendix 3 - Ground Rent Estates 5 Limited - Exit Strategy), focuses on an orderly disposal of the Company's sole asset, the freehold of Nova House, followed by a structured wind-up to minimise liabilities and achieve closure of GRE5. This strategy aligns with the 2026/27 Business Plan (Appendix 1), which emphasises financial closure, cost recovery, and resolution of outstanding loans and the resolution of the subrogation of insurance claim.

Key elements include:

- a) **Sale of the Freehold Asset.** Prioritise offering the freehold of Nova House to qualifying leaseholders under the statutory process outlined in the Leasehold Reform, Housing and Urban Development Act 1993 (as amended). If leaseholders decline, then GRE5 will proceed to an auction sale to maximise value, ensuring compliance with public sector procurement rules and best value principles.
- b) **Subrogation of Insurance.** The Company agreed as part of the insurance settlement in regard to the works to support the claim by the insurers in their pursuit of recovery of costs from consultants. The Company cannot be wound up until subrogation of the insurance claim has been concluded. Latest estimates are that this could take between 6 and 18 months depending on whether the claim is a negotiated settlement or settled by Court action. The latter period being the initial estimate for a Court process.
- c) **Loan and Interest Write-Offs.** Recommend partial writing off by 31 March 2026 of outstanding Council loans and accrued interest payments for 2024/25 and 2025/26 in the amount of £4.546m. This will leave £1.328m if the loan outstanding is settled on the loan repayment date in August 2027. This is required because GRE 5 does not have the income or asset base to meet all the loan and interest payments, with the loans due to be paid in August 2027 and enables a stronger balance sheet and solvent wind up. Further detail has been provided in the financial implications section of this report. The exit strategy would be approved subject to the changes referenced here.
- d) **Winding-Up Procedure.** Upon successful disposal of the freehold of Nova House and that being the Company's only significant asset, GRE5 will have no ongoing income streams, with the Council as its sole remaining creditor. Options for closing a limited company will be dependent on whether the company is solvent (can pay its bills) or insolvent (cannot pay its bills) as defined by the Insolvency Act 1986. The options include:
 - Circumstances where the company could be wound up voluntary outlined within the Insolvency Act 1986 Sections 84-86. The company would pass a resolution to wind up either by a Creditor Voluntary Liquidation (CVL) if the company cannot pay its debts or a Member Voluntary Liquidation (MVL) if the company can pay its debts. Under MVL, the Directors would need to make a declaration in accordance with Section 89 of the Act. Section 90 outlines the distinction between a members and a creditors voluntary wind up. The Act requires a liquidator to be appointed and all powers of the directors cease unless notified otherwise by the liquidator. Under MVL, the process can take up to 12 months, whereas the CVL process can take up to 24 months and the liquidators will investigate the directors regarding their conduct of running the company with the liquidators acting in the interest of the creditors. If the liquidators decides that director conduct was unfit, the directors can be banned from being a director for 2 – 15 years.

- Another option for a solvent company is voluntary strike off under Section 1003 of the Companies Act 2006, no trading or liabilities remain and has been dormant for three months or more, providing a simpler, faster alternative with minimal costs (e.g., no liquidator fees).
- The company, if insolvent would not seek to enter into administration. The company would hold no assets or generate turnover to warrant entering into administration.

The position outlined in this report by improving balance sheet health and the company operating as a non going concern, places the company into a solvent position so the company could follow either a MVL or strike off subject to meeting the criteria outlined in the relevant acts.

2.22 With remediation complete and the RTM transfer in place, retaining the Company exposes the Council to unnecessary reputational, legal, and operational risks. Wind-up post disposal of Nova House brings these to bear efficiently, minimising exposure.

2.23 The Exit Strategy supports the Council's broader asset review, freeing resources from a non-core subsidiary acquired solely for resident safety post-Grenfell. Alternatives, such as ongoing retention or transfer to the Council's commercial portfolio, would incur administrative burdens, bad debt provisions, and limited returns, making wind-up the most efficient option.

3. Implications of the Recommendation

3.1 Financial implications

3.1.1 The business plan provides the financial information since the Council bought the company, the draft FY 2025 position, projected FY 2026 (2025/26) forecast and the projection for FY 2027 (2026/27). Based on the company's business plan prepared in early January and approved by the company Board, there could be a net company financial liability exposure of around £3.970m by 31 March 2027 although this will be dependent on delivering the exit strategy and any arrangements agreed regarding the outstanding loan and interest. The company's only turnover is through ground rents which is minimal with the company unable to repay the loan when it becomes due in 2027.

3.1.2 The GRE5 Shareholder Representative working with the Executive Director Corporate Resources and the GRE5 Directors have been working on finalising residual financial liabilities including the outstanding loan and potential non receipt of interest on loans that the Shareholder is exposed to. The business plan outlines this risk and need for the company and council to agree liabilities.

3.1.3 The Council as lender has provided a loan facility agreement to the company of up to £15m for the period August 2022 – 2027 as approved by Cabinet in March 2023. As at 31 March 2025, the company had drawn down £4.940m not including interest due of £0.226m. The loan is a capitalised loan and accrues interest at a rate of 6.0% per annum. The company is unable to make any further drawdowns unless the loan facility purpose can be met, namely, clause 3.2: the facility to fund working capital costs and remediation costs of the borrower.

- 3.1.4 The Council as at 31 March 2025 has set aside a provision of £3.322m to cover company liabilities and any residual impact on the Council's accounts, for example, interest raised, Director costs and implications arising from the Share Purchase Agreement regarding waking watch costs. The final impact on the Council's financial liabilities will be confirmed once the company's exit strategy is executed during 2026/27, however, it is prudent to assess provision requirements and potential liability risk that the council would need to provide for. To facilitate the exit strategy, Directors appointments will be through the Council, appointed as non Executive Directors exclusively working for the company. The Council will cover their salaries to support the Companies exit strategy.
- 3.1.5 Taking the current business plan into consideration, updating the company's cashflow position as at 11 February 2026 and reviewing the company's ability to repay the loan and interest using the balance outstanding as at 31 March 2026, the Council's potential exposure is as summarised in the next table which indicates a potential increase of £0.332m in 2025/26, a further £0.098m in 2026/27 and £0.155m in 2027/28. The loan write off will be tax neutral for corporation tax purposes as the lender and borrower are connected companies.

	£m
Loan outstanding (Principal and Interest)	5.766
Less loan and interest write off	-4.546
Total residual loan due August 2027	1.220
Minimum Revenue Provision (MRP) balance to be charged	4.730
Less loan outstanding	-1.220
MRP to be charged to General Fund	3.510
Treasury budget 2025/26 (Interest write offs) met by P11 undeclared underspend	0.584
Provision drawdown (balance held £3.322m)	2.896
Increase in provision	0.278
Other costs – Exposure assessment	0.054
Shortfall on General Fund 2025/26	0.332

- 3.1.6 The financial information included within the business plan for FY 2025/26 is an estimate. The company's accounts are due for filing at Companies House on or before 31 March 2026 to enable the council nominated Directors to familiarise with the company operations and financial affairs and conclude the audit. As the exit strategy will move the company to a wind up position within the next 24 months, the company under FRS 102 The Financial Reporting Standard applicable in the UK and Republic of Ireland will need to file accounts on a non-going concern basis and provide the reason for this being the intention to cease operations and wind up the company solvently following the sale of the freehold of Nova House. The company will no longer have a purpose to continue trading as it will no longer generate turnover.
- 3.1.7 To support the company in its business plan and exit strategy, the council has provided a letter of assurance to support a non-going concern basis, providing limited financial support for a solvent wind up in alignment with the proposed exit

strategy for up to 24 months from the accounts being approved and signed. The Directors have also prepared a letter on a non-going concern basis covering a period of up to 24 months.

3.2 Legal implications

3.2.1 GRE5 is responsible for regulatory compliance of the Nova House site. The introduction of the Building Safety Act 2022 has significantly changed the rights, powers and protections for residents of high-rise buildings. The purpose behind the legislation is to provide leaseholders with protection from the costs associated with non-cladding defects, including interim measures like waking watches. Residents also have rights to report concerns to the Building Safety Regulator.

3.2.2 The Council owes a fiduciary duty to its taxpayers, as well as a best value duty to make arrangements to secure continuous improvement in the way its functions are exercised, having regard to a combination of economy, efficiency and effectiveness. Some of the works required to cover building defects are not covered by a Homes England grant, although the availability of grant funding has been widened over time.

Any works undertaken by GRE5 to the building are likely to increase the value of the leases, but unlikely to substantially increase the value of the freehold interest. Therefore, the Council needs to note that it is unlikely it will be able to recover all of its loans to GRE5 Limited and although there will have been a significant investment into the building it is unlikely the value of the asset or the value of its shareholding will increase.

GRE5 sought professional advice and took legal proceedings against the original insurance warranty holder and this has been subject to a mediated settlement. However, as part of that agreement the Company will be involved in a Subrogation of Insurance Claim. At this point it is not known whether there will be any proceedings or the time limit for this, although the indication is the period this will take to resolve will be between 6 and 18 months. However this does not prevent the Council as shareholder from selling the shares to dispose of its interest.

3.2.3 The Council is awaiting details of the recoverability of the remainder of its loan from qualifying leaseholders and the extent to which Homes England will recoup its grant funding from the settlement figure. An update on the current position is contained within Appendix 2.

3.2.4 The Council has powers of investment under s.12 of the Local Government Act 2003, which permit it to invest for any purpose relevant to its functions under any enactment or for the purposes of the prudent management of its financial affairs. In deciding whether to invest, the Council must take account of Government guidance. Investments are split into investments held for treasury management purposes and other investments. Investments for treasury management purposes must comply with the requirement to prioritise security, liquidity and yield. The loan to GRE5 was not considered as a treasury management investment. Other investments should be presented in a way that discloses the contribution it makes towards service delivery objectives and/or place making role of the local authority. The Council's Treasury Management Strategy makes reference to loans being provided to council owned companies, including GRE5 under the section on Non-Treasury Investments.

3.2.5 The Local Government Act 1988, section 24 provides a power to provide financial assistance for privately let housing accommodation. Subject to s.25 a

local housing authority shall have the power to provide any person with financial assistance for the purpose of, or in connection with, the acquisition, construction, conversion, rehabilitation, improvement, maintenance or management of any property which is or is intended to be privately let as housing accommodation. This was the power relied upon to extend the loan facility to GRE5. The Council acquired the shares of GRE5 with a view to improving the safety of the building for its residents, as opposed to for an investment purpose. This is the only known high rise residential building in Slough that has failed flammability tests in relation to ACM cladding and providing funding for the specific purpose of addressing the building defects is not likely to create an expectation that other building owners will be able to secure loan or grant funding from the Council.

3.2.6 GRE5 has pursued avenues to secure external funding to enable it to repay the loan, including securing Homes England grant funding, recovery of losses via insurance claim and recovery of costs from leaseholders. However despite these efforts, there appears no realistic prospect of the loan being fully repaid. For this reason recommending partial write off and a removal of interest is a pragmatic means of allowing for an exit strategy to be pursued.

3.2.7 Further information is provided in Appendix 2 and 3.

3.3 Risk management implications

3.3.1 The table below sets the key risks for the Council:

Risk	Summary	Mitigations
Financial	The council could be exposed to financial risk caused if the company becomes insolvent or unable to meet its liabilities requiring the council to meet costs	<p>The council is proposing to write off partially the loan principal and interest for 2024/25 and 2025/26 in acknowledgment that the company has limited options to generate income. The partial write off will improve the balance sheet health to enable a solvent wind up in the future.</p> <p>The council has assessed the company's business and exit strategy including future potential liabilities held by the council as referred to earlier in this report.</p> <p>The issued letter of assurance provides conditions for the company and council as Shareholder to comply with to monitor the business plan, exit strategy delivery and financial position.</p>
New Directors appointments	If the council does not approve the recommendations, the new directors face increased personal liability, weakened governance, inability to meet statutory duties, operational constraints, and reputational	<p>The council undertook a robust employment process to appoint the new directors who have significant experience of undertaking roles for other local authority companies. If Council does not approve the recommendations and the Directors resign then mitigations are:-</p> <p>Put in place temporary or interim delegations approved by senior officers (under existing constitutional powers) until full council approval can occur.</p> <p>Benefit:</p> <ul style="list-style-type: none"> Ensures directors have clear authority for essential decisions

Risk	Summary	Mitigations
	<p>damage—all of which materially hinder their ability to lead the organisation effectively and safely. The outcome of which is likely to see the new Directors resign from their position and would leave the Council with limited opportunity to manage the exit strategy proposed within this paper.</p>	<ul style="list-style-type: none"> • Reduces risk of acting outside approved limits • Maintains operational continuity <p>Introduce a defined operating framework allowing directors to make minimal, risk-free, or business-critical decisions.</p> <p>Benefit:</p> <ul style="list-style-type: none"> • Prevents directors from inadvertently taking on liabilities • Provides a structured, low-risk operating environment • Ensures essential services continue <p>If council approval is delayed, risks can be mitigated through interim delegations, in-principle political support, legal oversight, risk-sharing documentation, enhanced reporting, and temporary operational constraints. These measures reduce the likelihood and impact of directors being exposed to governance, statutory, or personal liability risks.</p>
Reputational	That taxpayer funds were used to fund works to a residential building.	Open and transparent reporting will allow residents and taxpayers to understand decision-making and the efforts made to manage the financial risks of the works.

3.4 Environmental implications

3.4.1 There are no direct environmental implications as a result of the recommendations contained in this report.

3.5 Equality implications

3.5.1 No equality implications have been identified as result of the options in this report.

4. Background Papers

None