



Byron Shire Council



Agenda

Extraordinary Meeting

Thursday, 30 July 2015

held at Council Chambers, Station Street, Mullumbimby
commencing at 11.00am

Public Access relating to items on this Agenda can be made between 9.00am and 10.30am on the day of the Meeting. Requests for public access should be made to the General Manager or Mayor no later than 12.00 midday on the day prior to the Meeting.

Ken Gainger
General Manager

CONFLICT OF INTERESTS

What is a “Conflict of Interests” - A conflict of interests can be of two types:

Pecuniary - an interest that a person has in a matter because of a reasonable likelihood or expectation of appreciable financial gain or loss to the person or another person with whom the person is associated.

Non-pecuniary – a private or personal interest that a Council official has that does not amount to a pecuniary interest as defined in the Local Government Act (eg. A friendship, membership of an association, society or trade union or involvement or interest in an activity and may include an interest of a financial nature).

Remoteness – a person does not have a pecuniary interest in a matter if the interest is so remote or insignificant that it could not reasonably be regarded as likely to influence any decision the person might make in relation to a matter or if the interest is of a kind specified in Section 448 of the Local Government Act.

Who has a Pecuniary Interest? - a person has a pecuniary interest in a matter if the pecuniary interest is the interest of the person, or another person with whom the person is associated (see below).

Relatives, Partners - a person is taken to have a pecuniary interest in a matter if:

- The person’s spouse or de facto partner or a relative of the person has a pecuniary interest in the matter, or
- The person, or a nominee, partners or employer of the person, is a member of a company or other body that has a pecuniary interest in the matter.

N.B. “Relative”, in relation to a person means any of the following:

(a) the parent, grandparent, brother, sister, uncle, aunt, nephew, niece, lineal descends or adopted child of the person or of the person’s spouse;

(b) the spouse or de facto partners of the person or of a person referred to in paragraph (a)

No Interest in the Matter - however, a person is not taken to have a pecuniary interest in a matter:

- If the person is unaware of the relevant pecuniary interest of the spouse, de facto partner, relative or company or other body, or
- Just because the person is a member of, or is employed by, the Council.
- Just because the person is a member of, or a delegate of the Council to, a company or other body that has a pecuniary interest in the matter provided that the person has no beneficial interest in any shares of the company or body.

Disclosure and participation in meetings

- A Councillor or a member of a Council Committee who has a pecuniary interest in any matter with which the Council is concerned and who is present at a meeting of the Council or Committee at which the matter is being considered must disclose the nature of the interest to the meeting as soon as practicable.
- The Councillor or member must not be present at, or in sight of, the meeting of the Council or Committee:
 - (a) at any time during which the matter is being considered or discussed by the Council or Committee, or
 - (b) at any time during which the Council or Committee is voting on any question in relation to the matter.

No Knowledge - a person does not breach this Clause if the person did not know and could not reasonably be expected to have known that the matter under consideration at the meeting was a matter in which he or she had a pecuniary interest.

Participation in Meetings Despite Pecuniary Interest (S 452 Act)

A Councillor is not prevented from taking part in the consideration or discussion of, or from voting on, any of the matters/questions detailed in Section 452 of the Local Government Act.

Non-pecuniary Interests - Must be disclosed in meetings.

There are a broad range of options available for managing conflicts & the option chosen will depend on an assessment of the circumstances of the matter, the nature of the interest and the significance of the issue being dealt with. Non-pecuniary conflicts of interests must be dealt with in at least one of the following ways:

- It may be appropriate that no action be taken where the potential for conflict is minimal. However, Councillors should consider providing an explanation of why they consider a conflict does not exist.
- Limit involvement if practical (eg. Participate in discussion but not in decision making or vice-versa). Care needs to be taken when exercising this option.
- Remove the source of the conflict (eg. Relinquishing or divesting the personal interest that creates the conflict)
- Have no involvement by absenting yourself from and not taking part in any debate or voting on the issue as if the provisions in S451 of the Local Government Act apply (particularly if you have a significant non-pecuniary interest)

RECORDING OF VOTING ON PLANNING MATTERS

Clause 375A of the Local Government Act 1993 – Recording of voting on planning matters

- (1) In this section, **planning decision** means a decision made in the exercise of a function of a council under the Environmental Planning and Assessment Act 1979:
 - (a) including a decision relating to a development application, an environmental planning instrument, a development control plan or a development contribution plan under that Act, but
 - (b) not including the making of an order under Division 2A of Part 6 of that Act.
- (2) The general manager is required to keep a register containing, for each planning decision made at a meeting of the council or a council committee, the names of the councillors who supported the decision and the names of any councillors who opposed (or are taken to have opposed) the decision.
- (3) For the purpose of maintaining the register, a division is required to be called whenever a motion for a planning decision is put at a meeting of the council or a council committee.
- (4) Each decision recorded in the register is to be described in the register or identified in a manner that enables the description to be obtained from another publicly available document, and is to include the information required by the regulations.
- (5) This section extends to a meeting that is closed to the public.

BYRON SHIRE COUNCIL

EXTRAORDINARY MEETING

BUSINESS OF EXTRAORDINARY MEETING

1. PUBLIC ACCESS
2. APOLOGIES
3. DECLARATIONS OF INTEREST – PECUNIARY AND NON-PECUNIARY
4. STAFF REPORTS

Infrastructure Services

- 4.1 Byron Bay Parking Study - Pay Parking exemptions and Butler Street Reserve 4

Councillors are encouraged to ask questions regarding any item on the business paper to the appropriate Executive Manager prior to the meeting. Any suggested amendments to the recommendations should be provided to the Administration section prior to the meeting to allow the changes to be typed and presented on the overhead projector at the meeting.

STAFF REPORTS - INFRASTRUCTURE SERVICES**Report No. 4.1 Byron Bay Parking Study - Pay Parking exemptions and Butler Street Reserve**

5 **Directorate:** Infrastructure Services
Report Author: Simon Bennett, Traffic and Transport Planner
File No: I2015/550
10 **Theme:** Community Infrastructure
 Local Roads and Drainage

Summary:

15 This report is the first of several to conclude the Byron Bay Parking Study and specifically looks to resolve matters in regard to pay parking, namely:

- confirming the exemptions to be provided, the cost and benefits of each and outline of the criteria to be used (and in so doing outlines the 'sliding scale');
- 20 • the use of Butler Street Reserve, including decision on the markets, fee structure for residents and business and encouraging all day parking; and
- provision of all day parking sites and benefits to exemption holders; and
- 25 • general other matters, such as the implications of multiple exemption permits for residents and businesses and the transferability of permits; multiple parking zones; and scope to for easing parking fees during low season/s.

30 The report however first highlights the benefits of the previously reported and recommended 'pay by plate' system noting the intention to proceed to tender in August, reporting and awarding tender in September and having pay parking operational in December prior to Christmas.

Separate reports to Council on the following will be tabled August/September:

- 35 (a) the proposed Resident Permit Parking Scheme including criteria and cost;
- (b) proposals to change the mix of long term and short term parking spaces in response to the consultant's (TTM) report recommendations; and
- 40 (c) new exemption criteria and transition of coupon holders to the new system.

RECOMMENDATION:

1. That Council confirm its intention to introduce a system of paid parking to the Byron Town Centre during the 2015/16 financial year as outlined in resolution 15-235 and that this system is based upon a pay by number plate approach.
2. That Council receive a report on establishing the costs, benefits and criteria of pay parking exemptions including that:
 - a) for an annual fee an exemption is provided for two categories of end user, one being a shire resident/ratepayer and the second being for a business operator, or an employee of one, located within the pay parking area;

BYRON SHIRE COUNCIL

- b) the exemption benefit is for 12-months from date of purchase, can be transferred to another vehicle if needed and not based on date or jurisdiction of registration;
 - c) payment options for the annual fee be for residents/ratepayers a single fixed amount, and for business/workers the cost of administering and providing a monthly account be investigated; and
 - d) no refunds be provided for or towards cost of exemptions except that those wishing to upgrade their fully paid exemption be provided credit of their unused amount, calculated at a daily pro-rate rate, toward such upgrade.
3. That Butler Street Reserve be made available as an all day car park, operating 6am to 6pm daily with the same hourly rate to apply as per other Council off-street car parks i.e. \$4 per hour, and the following rates also apply:

Exemption held:	Max rate
None	\$20/day
2P	\$10/day
4P	\$5/day
4P+	Free
worker/bus	\$40/month

4. That to provide incentive to park outside the town centre the following be investigated further and included in the report back to Council regarding time limits:

Exemption held:		None	2P	4P	4P+/ workers
Site	Open	Rate			
Butler St Reserve	6am-6pm	\$20/day	\$10/day	\$5/day	Free
Clarkes Beach CP	6am-6pm	\$20/day	\$10/day	\$5/day	Free
Jonson St, sth of Kingsley	all day	\$20/day	\$10/day	\$5/day	Free
On-street, east of Middleton	all day	\$20/day	\$10/day	\$5/day	Free

- 5. That Council provide written advice to the Community Association and Farmers Markets that their temporary licence to occupy the Butler Street Reserve, Byron Bay may not be re-issued after its expiry on 31 March 2016 for the Butler Street Reserve location.
- 6. That Council enter into discussions with the Community Association and Farmers Markets to pursue an agreement on the future location of these markets.
- 7. That Council offer assistance to the Byron Community Association and Byron Farmers Market in seeking and facilitating a suitable long term markets venue in or around Byron Bay.

Report

This report follows the previous staff report to Council as tabled 21 May 2015 resolved upon as follows:

15-235 Resolved:

1. *That Council endorse the introduction of a Byron Bay town centre pay parking scheme which applies a unilateral \$4 per hour rate and provides an annual exemption to eligible residents which is charged at \$100pa and granted on the proviso of meeting Council's existing exemption (coupon) criteria.*
2. *That a pay parking area be endorsed as depicted in Figure 1 of this report (I2015/298), which covers:

 - a) *a limited area west of the rail corridor, being on-street locations between east of Milton Street through to the Butler Street and Lawson Street intersection and north side of Somerset Street; and*
 - b) *east of the rail corridor, including Jonson Street and all areas bounded within north of Browning Street, east of Tennyson Street and east to Massinger Street, with the exception of both Kingsley Street and Ruskin Street west of Middleton Street.**
3. *That a Resident Permit Parking area be endorsed as depicted in Figure 1 of this report (I2015/298), which excludes the pay parking area and covers on-street locations:

 - a) *west of the rail corridor, as bounded by and including Butler Street, Burns Street and the south side of Somerset Street; and*
 - b) *east of the rail corridor, as located between Middleton Street and Tennyson Street for both the south side of Kingsley Street and both sides of Ruskin Street, and the greater area as bounded by east of Tennyson Street, through to and including Massinger Street and north of and including Browning Street.**
4. *That Roads and Maritimes Services (RMS) concurrence and approval, where required, be sought to allow implementation of both a Pay Parking Area and a Resident Permit Parking Area.*
5. *That Council proceed to procurement to implement a Pay Parking Area as described within this report (I2015/298).*

In addition, this report also follows the response to the Mayoral Minute as provided 11 June 2015, noting the 21 May report detailed much of the background to the Byron Bay parking study as first reported to Council 22 May 2014 (which included the consultant's preliminary report) and again on 11 December 2014 following extensive consultation (over 1,000 submissions) during July 2014.

Details of those reports will not be reproduced here and can be found online within the respective meeting agendas at Council's website: <http://www.byron.nsw.gov.au/meetings>.

Suffice to say however following a series of reports, workshops and extensive consultation Council has resolved to introduce \$4 per hour for Council car parks and on-street locations within the Byron Bay town centre and that 'locals' be provided an exemption from paying the meter (but not the time limits) on the proviso they meet the eligibility criteria and pay \$100pa.

While this is Council resolved position, it has met considerable (yet expected) resistance on various grounds including the hourly rate and per annum exemption cost (which is a four-fold

increase on the current off-street coupon) and therefore seen by some as too expensive and likely to have a detrimental impact on local business. There is also concern by neighbouring shire residents, and specially those that work in the town centre, that they have no option for an exemption or discount.

5 Further, a Byron United (the Byron Bay Chamber of Commerce) 30 June 2015 convened forum revealed similar concerns; especially regarding the 'high' hourly rate and need for long term, day car parking for workers. These concerns were further discussed at the 2 July 2015 Councillor Workshop where a range of issues were identified as needing further review. It was subsequently
10 agreed that these issues and proposed solutions would be brought to a further councillor workshop to be held 30 July. Meetings have also been held with the Byron Bay Business Working Party in efforts to listen to and seek clarification of business concerns about paid parking and the outcomes from these meetings will also be verbally reported to this workshop.

15 These further consultations are being undertaken in an effort to resolve the most contentious aspect of the Byron Bay parking study; i.e. extending pay parking from its current confinement to Council's car parks (at \$4 per hour) to on-street and other off-street locations within the town centre such as the 'Rails' gravel car park area and on the perimeter such as Butler Street Reserve.

20 While this report seeks to address these concerns it first outlines the proposed system and expected benefits of the 'pay by plate' system.

'Pay by plate' parking proposed

25 The new system is proposed to be simple. An electronic data network based on registration plate entered at the meter. This will help with enforcement and administration and remove the need for paper coupons and ultimately mean (once registered) the end user can manage their 'account' online if they wish and not need to present at Council to be issued future exemptions. For the
30 existing coupon holders they can (with their consent) be pre-approved and loaded into the system.

This 'pay by plate' system exists in legislation, has a regulatory framework for enforcement and administration and does not require Council to 'invent' or adopt third party measures such as a coupon, pin-codes, resident card, etc.

35 Another advantage compared to those options is that 'pay by plate' can not be as easily reproduced and limits fraudulent use and ensures no 'black market' of selling/swapping exemptions as they are connected to a vehicle which is either present or it is not and existing regulation requires everybody (exemption or not) to enter details at the meter, thereby ensuring enforcement receives 'real time' data to know where and when a vehicle has arrived. This same
40 data stream could also be sent to websites, phone applications and even road side (VMS) signs advising of parking occupancy to help with trip planning and travel demand.

Further advantages of 'pay by plate' is that users do not need to return to their vehicle to place a ticket on the dashboard (but can if they wish) and Council save money as they do not have to mark
45 or number individual parking bays as again the exemption or the hourly rate paid applies to the vehicle not the space. This also means a person can conceivably 'top up' if you wish to stay longer at any meter and not have to return to where they parked subject to remaining within applicable time limits.

50

Exemptions

Two exemptions proposed – resident/ratepayer and workers/business

- 5 The agreed principles to date have been to make the system as simple to understand as possible, hence the \$100pa 'locals' exemption providing all day parking has been resolved. Criticisms of this one fee structure is it does not provide choice of the 'sliding scale' presented below (Table 1) nor provide for workers in the town centre who are not either a resident or ratepayer.
- 10 Accordingly it is recommended two exemptions be adopted, one being for shire residents or ratepayers and the other being for workers and business located within the pay parking area with varying costs and benefits made available.

Exemption costs and benefits

- 15 Table 1 presents 'sliding scale' system of payment that offers end-users choice based on their use and need and is discussed below.

Table 1: sliding scale - exemption costs pa and benefits

20

Hrs/day, up to:	2P	4P	4P+	Off-street ¹	On-street ¹
Shire Resident or Ratepayer exemption	\$50	\$75	\$100	\$100pa holders only	All day parking to be made avail in some locations, see Figure 1
Workers exemption (i.e. those who work in pay parking area and a resident or ratepayer)	Pay at meter			\$480/yr	
Shire Pensioner s	Free	Free	Free	Free	
Disabled permit holders	Free	Free	Free	Free	
Non-exemption holders	Pay at meter			\$20/day Butler St Reserve	

¹ see Figure 1

- 25 The scale - unlike a single flat fixed pa rate – looks to provide choice based on use. However regardless of which option is chosen it is recommended the exemption lasts for the 12 months from date of purchase; i.e. it is not tied to 30 June nor connected to the expiry of the vehicle registration plate as per the current 'coupon' system.

- 30 Similarly, be it a single exemption fee or various options as per Table 1, it will allow people to park where they wish with the time limits or their preference dictating their choice of location thereby avoiding the need for parking precincts which can be easy to misunderstand or put a bias on one site over another. To this end variable or hourly discounted rates are not recommended other than capping the amount paid at some locations as per Table 3 and shown in the map at Figure 1.

- 35 As for payment of the exemption it is recommended the resident/ratepayer cost be a single annual payment made in full that provides the 12 months from date of purchase. As for the annual worker exemption, the business working group at the first meeting (23 July) requested that there be an option for this fee to be paid monthly and that for those workplaces willing to pay for and manage their employees parking that they have an 'account'. This option is considered feasible and will form part of the equipment/technology tender, preferably the account being online and automated.
- 40 The primary principle however being the onus is back the exemption or account holder to manage their affairs, not Council.

- 45 In the event any exemption holder finds that they need more hours on any particular day than their pre-paid exemption allows, they can then pay the meter which will be capable of handling 15-minute increments of payment/duration noting that payment for an hour or "part thereof" is typical of most meter schemes.

Exemption criteria

To date it has been assumed the current coupon criteria and items of proof as shown in Table 2 would apply to new pay parking exemption. However, while it provides a coupon to residents with a business/commercial interstate plate it does not afford the same benefit to privately owned vehicles.

Therefore the criteria will have to change if the intention is that those that live in Byron shire with a private interstate registered vehicle are to have access to an exemption. Council's own legal services has not advised of any concern with such an approach noting that the matter of living in NSW with an interstate plate is not Council's jurisdiction nor concern.

Assuming this approach is supported a report on changing the exemption criteria will be subject of a separate report.

Table 2: three categories of coupon eligibility – one private or two business options

Category →	Private	Business1	Business2
Items of Proof 1-4 (✓=required):	Resident name & address	Business name & residential address	Commercial / industrial address
1. Copy of current vehicle registration	✓	✓	✓ ^(c)
2. NSW Drivers Licence	✗	✓ ^(a)	✓ ^(b)
3. Current utility bill other than rates or water	✗	✗	✓ ^(b)
4. Completed Coupon Application Form	✓	✓	✓

*NB:

- (a) denotes owners name must match the residential address as shown on item of proof #1
- (b) denotes same name and Byron shire residential address must be upon both items of proof #2 and #3
- (c) denotes exception to the requirement item of 'proof' must display a Byron Shire residential address

Butler Street Reserve (a non-meter pay parking area)

Butler Street Reserve has the potential to hold a few hundred vehicles at any one time. As such it has been viewed as the 'panacea' to all pay parking problems forecast by residents, visitors and workers. However for its full capacity to be realised the markets presently utilising this site will need to be consulted on their potential relocation as the parking area will encroach upon the space that they currently use to a significant, and for them a possibly unsustainable, degree.

Market relocation

Butler Street Reserve offers much potential to alleviate in-town parking if correct incentives were used (e.g. lower rates, longer parking). It also offers the ideal site for those to access cheaper parking but not able to obtain an exemption, e.g. residents of adjacent shires, workers in town, etc.

However how and when the Reserve is and can be used does first require a decision on the potential relocation of both the weekly Thursday Farmer markets and the first Sunday each month community markets. Both markets currently hold a temporary licence for use of the site expiring at the end March 2016.

Pressure to relocate however is not solely related to the introduction of pay parking as the town centre master plan identifies eventual market relocation and the bypass construction scheduled during much of 2016 would likely influence market relocation or very least diminish market and site amenity, and at times likely to restrict access.

Both the Community Association and Farmers Market licence are identical in their terms. There is no ambiguity about the date the licence agreements should end. The general legal rule is that where a licence is granted for value and for a definite period, it will not be revocable until the expiration of that period.

5

The Licence provides various grounds for licence termination due to default by the licensee. However, there is no suggestion that either the Community Association or Farmers Market is in breach of its licence terms.

10 There are no grounds available to Council under the licence agreements allowing early termination.

15 Short of agreement Council's only option for ending the licences early would be to terminate them prior to 31 March 2016. Termination would be in breach of the licence terms. Council would possibly sustain loss for its contractual breach.

There is nothing in the licences preventing Council from approaching the licensees about agreeing to end the licences early.

20 Accordingly there are only two viable options for relocation.

25 The first is that Council wait until both market licences expire on 31 March 2016, meaning that prior to then the use of the reserve as a car park is limited, for example all days except community market days and each Thursday until 12noon. This co-existence however would present various complications for all parties with competing interests and demands and likely misunderstanding on what days and times general car parking operates and does not; all of which adds to difficulty of enforcement and management.

30 The second is that Council work with the markets to find a suitable site(s) so relocation occurs as early as possible (hopefully by no later than Friday 30 October 2015) so as to allow the site to be prepared for a scheduled early December 2015 commencement as a car park.

This is arguably Council's best option for obtaining its desired outcome.

35 Accordingly, Council should commence a process of consultation with both market operators as soon as possible so as to gain an appropriate understanding of their perspectives on this issue and potential problems that they may confront. The value of these markets to the developing economy is well known and Council has a history of supporting them. Should relocation to an alternative site be necessary, Council should offer to support and facilitate this.

40

Car park operations – cost and options

45 Council's current resolved position is that Butler Street Reserve be provided as an \$80 per month lease per space site with priority given to those unable to obtain any exemption, for example in-town workers who reside outside Byron shire. It has since been argued however the monthly fee is too costly for the intended market group, many of them young, casual or temporary workers on low wages.

50 Therefore following the feedback received, it is now recommended the adopted \$80 per month lease per space be halved to \$40 per month (i.e. \$480 per year) and instead of applying to the car space applies to the registration plate and therefore consistent with the 'pay by plate' system'.

55 Further however, and to respond to the business working group request, it is conceivable the one 'account' allows several vehicles with the fee paid determining how many can park at anyone time. For example a business has 10 staff but only ever has 6 employees at anyone time therefore only

needs to purchase 6 passes with any attempt to park more than the allocated amount (i.e. 6 vehicles at any one time) will be subject to penalty.

5 Therefore the option of an “account” (similar to the e-Tag toll systems) will be explored via the tender process including ability to pay monthly with the principle being the onus to manage and ensure correct use of the system is back on the end user, in this case the business or workplace who will want to ensure they are paying for current employees based on need. Admittedly the account system has potential for fraudulent use, for example a business account holder includes a non-employee, however if such occurs it would be considered minor in nature and can be the subject of review later if need be.

15 Further details on the fee structure for Butler Street Reserve and other perimeter sites is discussed below and detailed in Table 3, noting aim to encourage all day parking at such sites with capped (maximum) daily rates.

Parking sites – proposed time limits, benefits and costs

20 To offer choice for those with or without an exemption and encourage parking outside the town centre it is recommended capped (maximum) daily rates and all day parking be provided at sites in Table 3 (and as shown on Map at Figure 1) noting benefits apply for those that do hold an exemption.

Table 3: capped rates and all day parking

Exemption held:		None	2P	4P	4P+/ workers
Name	Time limit				
Butler St Reserve	6am-6pm	\$20/day	\$10/day	\$5/day	Free
Clarkes Beach CP	6am-6pm	\$20/day	\$10/day	\$5/day	Free
Jonson St, sth of Kingsley	all day	\$20/day	\$10/day	\$5/day	Free
On-street, east of Middleton	all day	\$20/day	\$10/day	\$5/day	Free

25

Figure 1: sites for all day parking



Other matters

5 Despite the above, time limits in general will be subject of a separate report, noting however the 30 July workshop will table some principles including use of foreshore car parks and Lawson Street North for all day parking.

10 Another matter raised during recent discussions is the implications of multiple exemption permits for residents and businesses and the transferability of permits. The 'pay by plate' system is based on paying for the vehicle not the space. Exploring the option of an "account" for business could potentially mean the could be offered for residents and ratepayers; i.e. they put as many vehicles as they wish on the one account but the number of vehicles that can park at anyone time depends on how many exemptions are held on the account. There is however believed several
15 complications with this, namely cost of creating and managing such a system and the legal and regulation framework has not been investigated. Nevertheless such capabilities will be sought via the tender process.

However overall it is intended business ratepayer with vehicles registered to their ratepayer address will be able to access the ratepayer exemption.

20 Another concern raised has been the understanding of multiple parking zones; i.e. the ability to park up to the time limit at one location and then move and lawfully park again at another site that same day without incurring penalty. This is lawful with or without pay parking and essentially requires a person to move their vehicle from the street block to another once the time limit is met. To help understand this further however the 'pay by plate' meter system could potentially advise a
25 motorist if they are eligible to park in the zone they have relocated to that day and if not provide a message accordingly.

30 As for easing parking fees during low season/s, the meter system is based on a data network that can take live up dates to parking fees and rates, therefore the capability will exist to provide variable hourly rates should the need arise in future, for example at lower demand times. However at present it is recommended the one single rate remain as resolved for all locations and times.

Financial Implications

35 The discussion in this report of providing exemptions or capped rates at certain locations has not been costed. Estimates however can be undertaken should Council resolve on such.

Statutory and Policy Compliance Implications

40 Previous reports as referred to have detailed such implications. No new implications are foreseen based on the discussion or recommendations of this report.