

Item No. 13.	Classification: Open	Date: 17 November 2015	Meeting Name: Cabinet
Report title:		Gateway to Peckham Project Update on Design Development, Leaseholder Negotiations and Informing Cabinet of Intention to Include all of Proposed Square in Compulsory Purchase Order (CPO)	
Ward:		The Lane	
Cabinet member:		Councillor, Mark Williams, Regeneration and New Homes	

FOREWORD BY COUNCILLOR MARK WILLIAMS, CABINET MEMBER FOR REGENERATION AND NEW HOMES

The continued regeneration of Peckham is a key priority for Southwark Council; the Gateway to Peckham project is a key part of this programme. By creating a new public square in the heart of the Town Centre, this project will act as a catalyst for future growth and investment in the area.

Architects Landolt + Brown were appointed in March 2015 and have carried out an intensive public consultation process called CoDesign. Through a series of workshops the CoDesign process has enabled local residents and businesses to collaborate in the design development of the scheme. The final result is a scheme that is reflective of the aspirations held by local people for Peckham's future.

The final proposals have now been submitted for planning determination and a decision is due in early 2016. The council is progressing negotiations with leaseholders and tenants to acquire the property interests required to deliver this scheme. The council has already acquired the unit at 74a Rye Lane.

Although it is the council's intention to acquire as many property interests as possible by agreement, it was considered that a Compulsory Purchase Order (CPO) may be necessary. Approval to issue a CPO was granted by Cabinet in March 2015. The original CPO boundary excluded a section of the proposed square where the lease is currently held by Bywater Properties. It was anticipated that Bywater Properties would enter into an agreement with Network Rail to develop their part of the site and the council would come to an agreement to acquire this part of the proposed public square.

Bywater Properties and Network Rail have yet to come to an agreement. In order to ensure that the council is able to deliver a complete square, the Director of Regeneration is proposing to use the powers granted by cabinet in the March 2015 to revise the CPO boundary.

RECOMMENDATIONS

1. That the cabinet notes that the council intends to make a Compulsory Purchase Order (CPO) under section 226 (1) of the Town & Country Planning Act 1990 and section 13 of the Local Government (Miscellaneous Provisions) Act 1976 for

the acquisition of the additional land hatched black on amended Ordnance Survey plan LBS_3175(Layout3) at Appendix 1 for the purpose of securing the creation of a new public square to the front of Peckham Rye Station as part of proposal site 6 in the Peckham & Nunhead Area Action Plan (PNNAP).

2. The Director of Regeneration is authorised to:
 - a) take all necessary steps to secure the making, confirmation and implementation of the CPO including the publication and service of all notices and the presentation of the council's case at Public Inquiry should one be called;
 - b) acquire all interests in land within the CPO boundary either by agreement or compulsorily;
 - c) approve agreements with land owners setting out the terms for the withdrawal of objections to the CPO, including where appropriate seeking exclusion from the CPO;
 - d) amend the boundaries of the area edged and hatched black on the Ordnance Survey plan LBS_3175(Layout3) at Appendix 2; or
 - e) either amend the boundaries of the Ordnance Survey plan LBS_3175(Layout3) at Appendix 2 to include Area 2 edged black on plan LBS_3175(Layout4) at Appendix 3 or seek a separate compulsory purchase order, if negotiations are not concluded between Network Rail (the freeholder) and Bywater Properties (the tenant), should it be required.
 - f) Make arrangements for the presentation of the council's case for confirmation of the CPO at any public inquiry;
 - g) exercise the compulsory purchase powers authorised by the CPO by way of general vesting declaration and/or notice to treat;
 - h) To approve the acquisition of all interests, where possible, by negotiation pursuant to the CPO approving payments to interest holders in line with the statutory compensation provisions within the budget and limits per interest set out in the closed report.

BACKGROUND INFORMATION

3. The council have now submitted an application for full planning permission for the provision of a new public square between the existing Grade II Listed Peckham Rye Station building and Rye Lane, created by removing the arcade buildings currently located between the north and south railway viaducts. Refurbishment of the railway arches to provide commercial units facing into the new square. Refurbishment and erection of a two storey roof extension to the building at 2-10 Blenheim Grove / 82 Rye Lane, hard landscaping and other associated works.
4. The council and Network Rail are finalising heads of terms for an agreement to allow the council the ability to redevelop the land acquired, of which Network Rail is and will remain the freeholder. This agreement will be in place before the compulsory purchase order is made.

5. Network Rail and Bywater Property have not negotiated a development agreement for the site which includes the area hatched black on amended Ordnance Survey plan LBS_3175(Layout3) at Appendix 1. Without the extension to the CPO boundary, the council can not guarantee that a full square will be delivered.
6. The council are of the view that the proposal to revise the existing CPO boundary to include the entirety of the proposed square will not affect the ability of Iceland, the tenant of the proposed extension, to trade.
7. The council will enter into negotiations with Bywater Properties to acquire this land by agreement and offer to replace similar accommodation above their unit at 74 Rye Lane.
8. Officers acknowledge that compulsory purchase powers should only be exercised if there is a compelling case in the public interest. Members should be sure that the purpose for which CPO powers are sought sufficiently justify interfering with the human rights of those with an interest in the land affected.
9. The background to this project has already been set out above. Since the original resolution in April 2013, officers have worked with Network Rail, engaged with members of the local community and leaseholders and occupiers with an interest in the site, with a view to obtaining interests by private treaty and securing a scheme which has the support of the local community. Consultation on the scheme is an on-going process and officers will continue to liaise with those with interests in the site to secure as many interests by agreement both up until the making of the CPO (if needed) and after the CPO has been made.
10. It is proposed that the CPO be made pursuant to Section 226(1)(a) of the Town and Country Planning Act 1990 (as amended). This power enables local authorities with planning powers to exercise their compulsory purchase powers if they think that acquiring the land in question will facilitate the carrying out of development, redevelopment or improvement on, or in relation to the land being acquired.
11. Circular 06/2004 titled "Compulsory Purchase and the Crichel Down Rules" provides guidance on the use of compulsory purchase powers. The Circular acknowledges that for the purpose of exercising S226(1)(a) it may not always be feasible or sensible to wait until the full details of the scheme have been worked up and planning permission obtained before proceeding with the order.
12. The use of Section 226(1)(a) is subject to subsection (1A) which provides that a local authority should not exercise the power to compulsorily acquire unless they think the proposed development, redevelopment or improvement is likely to contribute to achieving the promotion, or improvement of the economic, social or environmental well-being of the area - the benefit in this instance not being necessarily restricted solely to Peckham but also to the Council's wider administrative area.
13. Officers are satisfied that the scheme underlying the CPO (as currently enshrined in the AAP) will contribute to the well-being of both the local area and deliver wider benefits for the Borough of Southwark. The first phase of redevelopment will secure significant economic investment in the Borough; it will facilitate investment by Network Rail to improve the station facilities and will

create secure and attractive premises around the station forecourt, which in turn creates new employment and investment opportunities.

14. The first phase of redevelopment will significantly contribute to and promote the overall social and environmental well-being of the area through the creation of a new public square; a new public realm asset. The environmental enhancement delivered by the new public square and the opening up of the station frontage should contribute to a reduction/perception of crime, creating a safe and attractive environment and increasing footfall to the station. Further it is considered this first phase of redevelopment will act as a catalyst to the other 3 phases coming forward for redevelopment, encouraging further investment which in turn will bring new economic opportunities with the environmental and social benefits that regeneration of the wider area will inevitably bring about.
15. As a result of identifying the separate stages/phases of development , it is proposed that the CPO boundary now only comprises the first stage of development (also being the area for which a planning application is currently being prepared) namely the area in front of the station (Area 1) edged black at Appendix 1 (amended Ordnance Survey LBS_3175(Layout3)).
16. Negotiations with Leaseholders and businesses has commenced with the first financial offers made by the Council to the Head Lessees in December 2014. The council have already acquired 74a Rye Lane.

KEY ISSUES FOR CONSIDERATION

17. LBS property and legal teams, supported by Carter Jonas Chartered Surveyors and Dentons' legal team, has undertaken an initial referencing exercise to establish the number and nature of the legal interests and registered occupiers within the CPO boundary.
18. The revised CPO boundary, Area 1 edged black on the plan LBS 3175 (layout 3) at Appendix 1; is understood to consist of approximately 11 registered long leasehold interests and approximately 35 leaseholders/occupiers, and in excess of 30 chair renters.
19. Negotiations to acquire the long leasehold interests by agreement have been taking place in earnest since December 2014 as discussions had stalled in the past over the approach to the site acquisition. The Council's aspiration is to deliver and complete the regeneration of this area without recourse to a CPO. However due to the complex legal arrangements within the CPO boundary it is highly likely that an Order will be required in any event to acquire any residual interests that are not registered, where the registered proprietor is absent / untraceable or any interests where agreement cannot be reached. Negotiation will continue with leaseholders on a voluntary basis whilst the order is made.
20. The area hatched black on amended Ordnance Survey plan LBS_3175(Layout3) at Appendix 1 will be acquired by way of a CPO should negotiations not reach a conclusion which will enable the council to deliver a full square as detailed in the planning application.

21. The making, confirmation and implementation of a compulsory purchase order is therefore recommended to achieve certainty of acquiring all the interests and other property within the envisaged timescale and to mitigate risk to the project.

Community impact statement

22. Gateway to Peckham forms a key component in delivering the aspirations and visions of the Peckham Nunhead Area Action Plan. It is envisaged that investment and improvements to Peckham Rye Station and surrounds will have a positive long term impact.
23. The council also recognise the impact that this development will have on surrounding communities in Peckham. The council has committed to a CoDesign consultation approach to evolving the design of the development with local stakeholders.
24. Four public workshops have been held, residents and businesses have been invited to attend these workshops and outline their aspirations and expectations for the development. Over 600 people have been involved in the consultation process for this project to date.
25. It is anticipated that electronic communications are maintained with those engaged in the process to provide updates on the progress of the project.
26. The council commissioned an Equalities Impact Assessment (EQIA) in December 2013 with an updated assessment completed in March 2015 that identified the risks and social considerations associated with this project. The recommendations have been implemented in response to this report.
27. The redevelopment of the area and the compulsory purchase order will dispossess some persons of their rights in land. This is a necessary process to ensure that redevelopment can proceed. The proposed new scheme has significant social economic and environmental benefits and accordingly, it is considered acceptable to use compulsory purchase powers. Essentially where the proposals are in the public interest and where, as in this case, the advantages of regeneration substantially outweigh the disadvantages to those dispossessed.
28. All leaseholders and occupiers that are dispossessed regardless of age, disability, faith/religion, gender, race, and ethnicity or sexual orientation have been and will continue to be treated fairly and equally throughout negotiations, and where appropriate, offered financial and relocation assistance as well as being advised of their legal rights in accordance with statutory principles and council policy.
29. The regeneration of the area including the creation of a public square is considered to have benefits to not only the immediate community but also the borough as a whole in that it will act as a catalyst to further investment. It is therefore necessary to balance the benefits that could be provided by the proposed scheme against the possible impact to those with an interest in the affected land. In carrying out this exercise a degree of proportionality should therefore be adopted. The individual rights under the Human Rights Act 1998 and Equalities Act 2010 have accordingly been considered and commented further upon in the EqIA, a link to which can be found in the Background Papers section of this report.

30. The furtherance of the regeneration will not negate the council's Diversity and Equal Opportunities Policies. Indeed in the long term it is anticipated the diversity of the area will be widened.

Equalities Analysis

31. In January 2014 and February 2015, an Equalities Impact Assessment (EQIA) was undertaken by URS Global / AECOM to establish the composition of leaseholders / occupiers / businesses, how they might be affected by the regeneration project and how any adverse effects might be mitigated.
32. The attention of cabinet members is specifically drawn to the potential impacts (positive and negative) outlined in the EQIA at chapter 7 and 8. The updated Equalities Analysis is annexed to this report at (please refer to the link provided in in the Background Papers section of this report) to make the cabinet aware of the issues which need to be considered in this particular case.
33. The Public Sector Equalities Duty brings together former race, disability and gender duties, and extends coverage to include age, sexual orientation, religion or belief, pregnancy and maternity, and gender reassignment. These are the grounds upon which discrimination is unlawful and are referred to as 'protected characteristics'.
34. The Duty requires public bodies to take proactive measures to address inequality. The purpose of these duties is to ensure that public bodies contribute to a wider government commitment to tackle persistent and long-standing issues of disadvantage and discrimination in society. It requires that in the exercise of all their functions, public bodies consider the need to eliminate discrimination, advance equality of opportunity and foster good relations.
35. The conclusions from the EqIA are outlined below at 36 - 41.
36. The redevelopment proposal is identified as giving rise to a number of positive equality impacts in relation to: an improved and more accessible public realm and streetscape; improved public safety; and potential new business opportunities, which could generate new employment opportunities for local people. People sharing protected characteristics are likely to be able to share in these benefits. Southwark Council, as a public body, can maximise this sharing of benefits, through explicit measures in their approach to future letting of premises and overall site management to encourage equal opportunities.
37. It is considered that the redevelopment proposals do have the potential to give rise to negative equality impacts in terms of potential loss of existing employment and business opportunities, and, to some degree, access to culturally-specific goods and services. BME-owned businesses and employees (particularly amongst people of Black African and Black Caribbean origin) are identified as particularly vulnerable to potential negative effects of the redevelopment and associated loss of existing business premises.
38. The new development will have a reduced amount of floor space available for businesses and there remains uncertainty regarding what proportion of existing businesses can expect to relocate into the new development. The potential implications of this may involve the closure of a number of BME owned businesses, which could result in job losses among people in BME groups.

39. Southwark Council has stated its commitment to enable businesses to remain local, unless they want to move elsewhere. Where businesses are able to relocate within the redevelopment or the local Rye Lane area, this would reduce the significance of negative effects for businesses and for customers from African, Afro-Caribbean and Asian backgrounds.
40. It is therefore crucial that the Council and Network Rail give consideration to appropriate mitigation measures in relation to these potential negative equality impacts in progressing the design proposals and, in the case of Southwark Council in their role as planning authority, in its overall consideration of the scheme.
41. The EqIA recommendations for mitigation have formed part of the possession strategy currently being pursued by officers working to acquire the interests within the proposed CPO boundary. It should be noted by cabinet that whilst the newly created space will provide new community and co-working space on the upper floors, there will be significantly less ground floor retail than accommodated within the existing. However, occupiers will, where possible, be relocated within the newly developed units or locally. The council have appointed Hindwoods Estate Agents to assist in locating suitable premises. The council have also commissioned a feasibility study to establish the potential to re-provide commercial accommodation on an alternative site at Bournemouth Close for hair and beauty businesses.
42. Equalities issues have been kept under review, and will continue to be kept under review throughout the life of the project.

Human Rights

43. The Human Rights Act 1998 prohibits public authorities from acting in a way which is incompatible with the European Convention on Human Rights. The Council is therefore required to consider whether its actions would infringe the human rights of anyone affected by the making of the CPO. While certain Convention rights may be relevant to the CPO (such as the “right to peaceful enjoyment of possessions”) interference with such rights by public authorities will be justified where the public interest outweighs the interest of the private individual. It is considered that any interference with the Convention rights caused by the CPO will be justified and proportionate in the wider public interest in order to secure the economic, social, physical and environmental regeneration of the Peckham Rye Station area.

Financial implications

44. All interests within the CPO boundary are commercial.
45. Leaseholders with an interest of over one year are entitled to the market value of their interest, a basic loss payment and other reasonable disturbance payments for being dispossessed as a natural and direct consequence of the CPO and redevelopment.
46. Tenants/licensees with less than a year may be entitled to disturbance compensation.
47. Investment Leaseholders are also entitled to their reinvestment costs, being the costs towards acquiring replacement premises including stamp duty and

acquisition fees.

48. Relocation vs Extinguishment: Relocation costs are the reasonable costs in relocating the business to an alternative location and include removal costs and temporary loss of profits. Where a business is unable to relocate they may be able to claim for extinguishment of the business. This is normally calculated based on a multiplier of adjusted net profits.
49. Where possible the existing business tenants will be relocated within the new scheme or elsewhere.
50. The assessment of compensation is pursuant to, or undertaken in accordance with the Compensation Code which is a collection of statutes and case law, the principal legislation being the Land Compensation Act 1961 (as amended).
51. The current estimates of the likely compensation categories and values are as set out in the closed report.
52. Each item of a leaseholder's compensation schedule is validated on its relevance to the claim. The costs set out in the closed report are the best estimates that can be obtained using publically available information and that supplied by the main head leaseholders. The legal situation is complex with multiple layers of interests and ownerships.
53. The acquisition price may vary due to market conditions but the professional fees to acquire all remaining leaseholder units is agreed advance of an acquisition to enable a degree in certainty for this cost.
54. A change in market values may see a corresponding change in basic loss payments to the leaseholder. A change in variables or input assumptions such as market value are a key determinant in assessment of overall compensation and to quantify incidental costs for purchasing a replacement property / relocation is very difficult without further financial information at this stage but these are kept constantly under review.
55. £10 million from the council's capital programme is committed to the scheme together with the GLA grant funding of £5.25 million; a combined total of £15.25 million.
56. The resultant commercial development will create an asset for the council and is estimated to have the market value set out in the closed report.
57. There is therefore sufficient funding already budgeted and allocated to finance the acquisition of the leasehold interests, associated disturbance costs and any third party interests and implement the scheme within the allocated budget. The budget also includes a sum for procedural and legal matters to enable the making, confirmation and implementation of the compulsory purchase order.
58. As the scheme progresses through the design stage and interests are acquired costs will be become fixed and the budget will be reviewed.
59. There will be staff resource costs in taking the Order[s] and project to completion, relocating tenants, and acquiring the leasehold interests; there is also provision for them in the overall project programme.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Law and Democracy

60. The authority to make a compulsory purchase order was granted by Cabinet in March 2015. This report is therefore concerned with the proposed acquisition of additional land and at paragraph 10, the report refers to the appropriate power under section 226(1), Town and Country Planning Act 1990 under which the Council can seek to secure the compulsory purchase of land. It is considered that the redevelopment of land and rights in the surrounding area to Peckham Rye station to allow the provision of a new square will assist the council in promoting and improving the economic, social and environmental well being of the area and therefore there are adequate powers available to the council to acquire all the land and property interests within the area shown hatched black on the plan annexed either compulsorily or by agreement.
61. The council also has the power under section 227, Town and Country Planning Act or section 120(1), Local Government Act 1972 to acquire interests in this site by agreement with owners.
62. In the original report, it was explained that the area proposed for redevelopment would be smaller than originally envisaged. The area at that stage did not include the Iceland site but otherwise negotiations with the relevant leaseholders and businesses have commenced and offers have been made. Reference is made in paragraph 19 of the report to the continuing negotiations. However, since the negotiations for this part of the site have not been concluded as explained in paragraphs 5 – 7 of the report, it is now considered to be more appropriate to include this additional land (as hatched black at Appendix 1) with a view to ensuring that a full new public square could be delivered
63. Paragraph 15, Part 3C of the council's constitution reserves the right to cabinet to make decisions on the acquisition of land and property which involves the use of compulsory purchase orders. However, this requirement does not apply where there is a scheme for acquisition which has already been agreed by members.
64. The financial implications of making the compulsory purchase order are set out in the closed section to the report By agreeing to make a CPO, it is arguable that the council is becoming liable to claims from leaseholders and businesses to claims for blight under the Town and Country Planning Act which would mean the Council becoming liable at an earlier date than might have been anticipated for payments of compensation to leaseholders
65. Since the funding for the acquisition of leases and compensation, payments have already been committed for this redevelopment, it is therefore considered that a "scheme" within the meaning of paragraph 15, Part 3C of the Constitution has already been agreed and that officers have authority to negotiate and complete the acquisition of interests up to the budget levels already identified.
66. Since the original resolution in April 2015 authorising the making of the CPO, the Government has published new guidance titled "Guidance on Compulsory purchase process and the Crichel Down rules for the disposal of surplus land acquired by, or under the threat of, compulsion". This guidance cancels and replaces the Circular 06/04. Whilst it is not considered that the Guidance materially alters the basis on which the April 2015 resolution was authorised, it is

considered prudent to update Members on what the revised guidance advises.

67. The guidance confirms (paragraph 2) that when making and confirming an order, the acquiring authority should be sure that the purposes for which the compulsory purchase order is made justify interfering with the human rights of those with an interest in the land affected. The officer's report seeking authorisation should address human rights issues; this is dealt with in detail above.
68. The acquiring authority must also, when exercising CPO powers have regard to its public sector equality duty as set out in Section 149 of the Equality Act 2010 and have regard to the effect of any differential impacts on groups with protected characteristics. Whilst reference is made to the equalities considerations at paragraphs 31-42 above (and in the earlier report, March 2015), it is emphasised that the equalities duty is a duty for the decision maker to discharge and accordingly Cabinet Members in making their decision have regard to (i) the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited under the Equality Act 2010; (ii) the need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it; and (iii) the need to foster good relations between persons who share a relevant protected characteristic and those who do not share it
69. In particular, the attention of Members is drawn to paragraphs 36 to 39 of the equalities impact assessment report and the potential for negative equality impacts arising from the proposed redevelopment. It may be possible to mitigate some of these impacts as identified at paragraphs 39 to 41 of the report and it is emphasised at paragraph 42 that the impacts will continued to be reviewed throughout the project.
70. Paragraph 13 of the guidance states that, when a minister is considering whether to confirm a CPO the acquiring authority must be able to demonstrate that there are sufficiently compelling reasons for the powers to be sought at that time.
71. In preparing its justification for the scheme the acquiring authority will need to address (a) the sources of funding and (b) the timing of that funding
72. It has already been addressed above that funding is readily available, now, to acquire the land required pursuant to the CPO and that funding is in place to construct the new square.
73. The acquiring authority will also need to be able to show that the scheme is unlikely to be blocked by any physical or legal impediment to implementation, of relevance here is the need for any planning permission. As mentioned, a planning application has recently been submitted. Whilst the guidance acknowledges that a CPO can be made absent a planning permission, it is not anticipated that the Council will proceed to make the CPO until, at the very least, a resolution to grant planning permission for the proposed scheme has been obtained. Thereby confirming, at the point the CPO is made, that there are no planning impediments to the proposed scheme.
74. Section 1 of the Guidance provides advice on the use of S226 of the Town and Country Planning Act 1990. Paragraph 76 identifies the factors which the Secretary of State will take into account in deciding whether to confirm an order

under S226(1)(a), this includes:

- a) whether the purpose for which the land is being acquired fits with the relevant planning policies for the area;
- b) the extent to which the proposed purpose will contribute to the achievement of the promotion or improvement of the economic, social or environmental wellbeing of the area;
- c) whether the purpose for which the acquiring authority is proposing to acquire the land could be achieved by other means.

75. It is considered that these issues have already been examined in the report, and in the previous report which was considered by Cabinet in March 2015. Officers are satisfied that the Council's Core Strategy and Peckham and Nunhead Area Action Plan supports the redevelopment of this area for the purpose which the CPO is sought and that the scheme will contribute to the improvement of the economic, social and environmental wellbeing of the area.

Strategic Director of Finance and Governance (FC15/029)

- 76. This report is requesting cabinet to note the update on the Peckham Gateway Project and also seeking authority to start a compulsory purchase order (CPO) process. Full details are provided in the open version of the report.
- 77. The closed report provides details of the estimated costs and it is noted that this can be contained within current available capital budget. The strategic director of finance and corporate services notes that the current estimated costs will be closely monitored and any request for additional resources will be subject to further reports to cabinet for formal approval.
- 78. Staffing and any other costs connected with this report to be contained within existing departmental revenue budgets. The costs associated with building ownership, such as NNDR, will be funded from within the existing revenue budgets.

BACKGROUND PAPERS

Background Papers	Held At	Contact
Gateway to Peckham - Public square and station regeneration Cabinet report.	Regeneration, Southwark Council 160 Tooley Street London SE1 2QH	Lauren Sharkey, 020 7525 3348
http://moderngov.southwark.gov.uk/mglIssueHistoryHome.aspx?IId=50001766		
Gateway to Peckham Project Update and Approval of the making of an application to the Secretary of State for a compulsory purchase order to acquire the property interests within the revised project boundary.	Regeneration, Southwark Council 160 Tooley Street London SE1 2QH	Lauren Sharkey, 020 7525 3348
Gateway to Peckham Project Update		
Gateway to Peckham Equalities Impact Assessment	Regeneration, Southwark Council 160 Tooley Street London SE1 2QH	Lauren Sharkey, 020 7525 3348
Gateway to Peckham Equalities Impact Assessment		

APPENDICES

No.	Title
Appendix 1	AMENDED LBS_3175(Layout3)
Appendix 2	LBS_3175(Layout3)
Appendix 3	LBS_3175(Layout4)

AUDIT TRAIL

Cabinet Member	Councillor, Mark Williams, Regeneration and New Homes	
Lead Officer	Eleanor Kelly, Chief Executive	
Report Author	Neil Kirby, Head of Regeneration / Lauren Sharkey, Development Project Officer	
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CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments sought	Comments included
Director of Law and Democracy	Yes	Yes
Strategic Director of Finance and Governance	Yes	Yes
Cabinet Member	Yes	Yes
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