

Item No. 5.	Classification: Open	Date: 28 September 2017	Meeting Name: Licensing Sub-Committee
Report Title		Licensing Act 2003: Boulevard Coffee, 224 Old Kent Road London SE1 5UB	
Ward(s) of group(s) affected		East Walworth	
From		Strategic Director of Environment and Social Regeneration	

RECOMMENDATION

1. That the licensing sub-committee considers an application made by J & Matt Limited for a premises licence to be granted under the Licensing Act 2003 in respect of the premises known as Boulevard Coffee of 224 Old Kent Road, London, SE1 5UB.
2. Notes:
 - a) This application forms a new application for a premises licence, submitted under Section 17 of the Licensing Act 2003. The application is subject to representations from responsible authorities and is therefore referred to the sub-committee for determination.
 - b) Paragraphs 8 to 10 of this report provide a summary of the application under consideration by the sub-committee. A copy of the full application is attached as Appendix A.
 - c) Paragraphs 11 to 14 of this report deal with the representations submitted in respect of the application. Copies of the representations submitted Responsible Authorities are attached to this report in Appendix B. A map showing the location of the premises is attached to this report as Appendix F.
 - d) A copy of the council's approved procedure for hearings of the sub-committee in relation to an application made under the Licensing Act 2003, along with a copy of the hearing regulations, has been circulated to all parties to the meeting.

BACKGROUND INFORMATION

The Licensing Act 2003

3. The Licensing Act 2003 provides a licensing regime for:
 - The sale of and supply of alcohol
 - The provision of regulated entertainment
 - The provision of late night refreshment.
4. Within Southwark, the licensing responsibility is wholly administered by this council.
5. The Act requires the licensing authority to carry out its functions under the Act with a view to promoting the four stated licensing objectives. These are:
 - The prevention of crime and disorder
 - The promotion of public safety
 - The prevention of nuisance
 - The protection of children from harm.

6. In carrying out its licensing functions, a licensing authority must also have regard to:
- The Act itself
 - The guidance to the act issued under Section 182 of the Act
 - Secondary regulations issued under the Act
 - The licensing authority's own statement of licensing policy
 - The application, including the operating schedule submitted as part of the application
 - Relevant representations.
7. The premises licence application process involves the provision of all relevant information required under the Act to the licensing authority with copies provided by the applicant to the relevant responsible bodies under the Act. The application must also be advertised at the premises and in the local press. The responsible authorities and other persons within the local community may make representations on any part of the application where relevant to the four licensing objectives.

KEY ISSUES FOR CONSIDERATION

The premises licence application

8. On 4 August 2017 J & Matt Limited applied to this council for the grant of a premises licence in respect of Boulevard Coffee of 224 Old Kent Road, London SE1 5UB. The premises are described in the application simply as being:

"The premises trades as a cafe style operation, serving food and coffee etc. during the day with the emphasis changing to alcohol in the evenings. Regulated entertainment by way of Live Music, Performance of Dance, Recorded Music, and Entertainment similar to live/ recorded music, is required , for Friday's Saturday's and Sunday's.

Alcohol is requested for 7 days a week, and late night refreshment for 7 days a week to allow hot food to be served whilst the premises is open to the public"

9. The application and is summarised as follows:
- The supply by retail of alcohol (both on and off sales)
 - Monday to Thursday from 11:00 to 00:00 (midnight)
 - Friday and Saturday from 11:00 to 04:30 (the following day)
 - Sunday from 11:00 to 02:00 (the following day)
 - The provision of late night refreshment (indoors):
 - Monday to Thursday from 23:00 to 00:00 (midnight)
 - Friday to Sunday from 11:00 to 00:30 (the following day)
 - The provision of regulated entertainment in the form of live and recorded music (indoors):
 - Friday and Saturday from 21:00 to 04:00 (the following day)
 - Sunday from 21:00 to 02:00 (the following day)
 - Opening hours
 - Monday Thursday from 08:00 to 00:30 (the following day)
 - Friday and Saturday from 08:00 to 05:00 (the following day)
 - Sunday from 08:00 to 02:30 (the following day)

- The proposed designated premises supervisor of the premises is Villarroel Coca who has a personal licence with the London Borough of Southwark.
10. The premises licence application form provides the applicant's operating schedule. Parts A, B, C, E, F, G, H, I, J, K, L, and M of the operating schedule set out the proposed licensable activities, operating hours and operating control measures in full, with reference to the four licensing objectives as stated in the Licensing Act 2003. Should a premises licence be issued in respect of the application the information provided in part M of the operating schedule will form the basis of conditions that will be attached to any licence granted subsequent to the application. A copy of the application is attached to this report in Appendix A.

Representations from responsible authorities

11. Representations have been submitted by the Metropolitan Police (licensing division) and this council's public health department.
12. The Metropolitan Police Service's representation is based upon the licensing objectives of the prevention of crime and disorder and the prevention of public nuisance. The author is concerned that the applicant's company director was involved with the management of the premises when a previous licence was revoked in May 2015 following an expedited review, following two incidents of serious violence and the premises operating beyond the terminal hour.
13. The Police acknowledge that a new premises licence was granted in December 2015 with conditions that addressed the concerns raised as a result of the revocation. The current application also has excessive hours outside of the Southwark licensing policy. The police ask that the application be rejected in full, but should members be minded to grant, conditions relating to an ID scanner have been requested. The representation is available in Appendix B.
14. The representation from public health is made in relation to the licensing objectives of the prevention of crime and disorder, the prevention of public nuisance and public safety. The objection raises general concerns in relation to alcohol consumption, but in addition to the police, makes it clear that the hours applied for are outside of the Southwark licensing policy. The representation is also available in Appendix B.

Representations from other persons

15. There are no representations from other persons.

Conciliation

16. The applicant's legal representative was sent copies of the submitted representations. At the time this report was composed, the report author was unaware whether or not the applicant had contacted the responsible authorities.

Premises history

17. A licence was initially issued in August 2014. This was revoked on 12 May 2015. The notice of decision containing reasons for the revocation are available in Appendix C.
18. A new premises licence application was made in December 2015. Representations were received from responsible authorities and the application went to the Southwark licensing sub committee on 18 January 2016. A copy of the notice of decision is available in Appendix D. That premises licence remains current and valid and is available in Appendix E.

19. The premises has utilised the temporary events notice (TEN) system; and have used up all TENs for this current calendar year.

Date of Application	Date of Event	Applicant	Licensable Activities	Issue of counter notice?
22/06/2017	From 02/07/2016 to 03/07/2016 18:00 - 03:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
19/07/2017	From 23/07/2016 to 24/07/2016 23:00 – 03:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	Yes (late TEN out of time)
28/07/2016	From 06/08/2016 to 07/08/2016 23:00 - 03:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
04/08/2016	From 13/08/2016 to 14/08/2016 23:00 - 03:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
31/08/2016	From 10/09/2016 to 11/09/2016 23:00 - 03:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
16/09/2016	From 24/09/2016 to 25/09/2016 23:00 - 03:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
30/09/2016	From 08/10/2016 to 09/10/2016 23:00 - 03:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
07/10/2016	From 15/10/2016 to 16/10/2016 23:00 - 04:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
21/10/2016	From 29/10/2016 to 30/10/2016 23:00 - 04:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
28/10/2016	From 06/11/2016 to 06/11/2016 00:05 - 04:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
18/11/2016	From 27/11/2016 to 27/11/2016 00:05 - 04:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
19/12/2016	From 1/1/2017 7 to 1/1/2017 00:05 - 05:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
09/01/2017	From 15/01/2017 to 15/01/2017 00:05 – 04:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	Yes (late TEN out of time)

13/01/2017	From 22/01/2017 to 22/01/2017 00:05 - 04:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
13/01/2017	From 29/01/2017 to 29/01/2017 00:05 - 04:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
03/02/2017	From 12/02/2017 to 12/02/2017 00:05 - 05:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
07/02/2017	From 26/02/2017 to 26/02/2017 00:05 - 04:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
03/03/2017	From 12/03/2017 to 12/03/2017 00:05 - 04:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
03/03/2017	From 26/03/2017 to 26/03/2017 00:05 - 05:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
04/04/2017	From 16/04/2017 to 16/04/2017 00:05 - 05:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
04/04/2017	From 30/04/2017 to 30/04/2017 00:05 - 04:30	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
05/05/2017	From 14/05/2017 to 14/05/2017 00:05 - 05:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
05/05/2017	From 28/05/2017 to 28/05/2017 00:05 - 05:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
25/05/2017	From 04/06/2017 to 04/06/2017 00:05 - 05:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
26/05/2017	From 18/06/2017 to 18/06/2017 00:05 - 05:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
23/06/2017	From 16/07/2017 to 16/07/2017 00:05 - 05:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
23/06/2017	From 02/07/2017 to 02/07/2017 00:05 - 05:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
13/07/2017	From 30/07/2017 to	Omar Villaroel	Alcohol - on premises Regulated entertainment	No

	30/07/2017 00:05 - 05:00	Coca	Late night refreshment	
24/07/2017	From 06/08/2017 to 06/08/2017 00:05 - 04:30	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
03/08/2017	From 20/08/2017 to 20/08/2017 00:05 - 05:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
03/08/2017	From 13/08/2017 to 13/08/2017 00:05 - 05:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
18/08/2017	From 27/08/2017 to 27/08/2017 00:05 - 05:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
18/08/2017	From 03/09/2017 to 03/09/2017 00:05 - 05:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
01/09/2017	From 10/09/2017 to 10/09/2017 00:05 - 05:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No
08/09/2017	From 17/09/2017 to 17/09/2017 00:05 - 05:00	Omar Villaroel Coca	Alcohol - on premises Regulated entertainment Late night refreshment	No - TENs used up for year

20. No complaints have been received in relation to the premises.

21. Visits have been conducted at the premises.

Date	Time	Outcome
24/06/2017	23:43	Long queues outside premises witnessed.
30/06/2017	23:10	Visit by night time economy team and Police – various licence breaches. CCTV not recorded for 31 days, no records of staff training, no signs asking patrons to leave quietly and inadequate SIA door staff. A Closure Notice under Section 19 of the Criminal Justice and Police Act 2001 was issued. A copy is available in Appendix F.
14/07/2017	22:10	Premises closed.
15/07/2017	20:15	Premises closed.

Deregulation of entertainment

22. On 6 April 2015 entertainment became deregulated and as a result:

- Live unamplified music is deregulated between 08:00 and 23:00 on any premises.
- Live amplified music is deregulated between 08.00 and 23.00 at on-licensed premises provided the audience does not exceed 500 people. However, live music can become licensable in on-licensed premises if the licensing authority removes the effect of the deregulation following a licence review ('licence review mechanism').

Map

23. A map showing the location of the premises is attached to this report as Appendix G. The area has a great number of licenced premises. The following licensed premises are in the immediate vicinity (within a 100 meter radius) of the premises application:

Perfect Fried Chicken – 259 Old Kent Road, SE1 5LU, licenced for:

- The provision of late night refreshment (indoors)
 - Monday to Sunday from 23:00 to 00:00 (midnight)

Nisha News – 246 Old Kent Road, SE1 5UB, licensed for:

- The sale of alcohol (off sales)
 - Monday to Saturday from 06:30 to 23:30
 - Sunday from 07:00 to 23:30

Old Kent Fish Bar – 253 Old Kent Road, SE1 5LU, licensed for:

- The provision of late night refreshment (indoors)
 - Monday to Sunday from 23:00 to 01:00 (the following day)

Aubergine – 251 Old Kent Road, SE1 5LU, licensed for:

- The provision of late night refreshment (indoors)
 - Monday to Sunday from 23:00 to 02:00 (the following day)

Village Pizza – 230 Old Kent Road, SE1 5UB, licensed for:

- The provision of late night refreshment (indoors)
 - Sunday to Thursday from 23:00 to 03:00 (the following day)
 - Friday and Saturday from 23:00 to 04:00

New Wing Fu – 227 Old Kent Road, SE1 5LU, licensed for:

- The sale of alcohol (off sales)
 - Monday to Sunday 12:00 to 00:00 (midnight)
- The provision of late night refreshment (indoors)
 - Monday to Sunday from 23:00 to 00:00 (midnight)
- **Eurotraveller Hotel – 194-202 Old Kent Road, SE1 5TY**, licensed for:
 - The sale of alcohol (on sales)
 - Monday to Sunday – 24 hours

- The provision of regulated entertainment in the form of live and recorded music and performances of dance (indoors)
 - Monday to Saturday from 11:00 to 23:00
 - Sunday from 11:00 to 22:00

Southwark council statement of licensing policy

24. Council assembly approved Southwark's statement of licensing policy 2016-20 on 25 November 2015. Sections of the statement that are considered to be of particular relevance to the sub-committee's consideration are:

- Section 3 - Purpose and scope of the policy. This reinforces the four licensing objectives and the fundamental principles upon which this Authority relies in determining licence applications
- Section 5 – Determining applications for premises licences and club premises certificates. This explains how the policy works and considers issues such as location; high standards of management; and the principles behind condition setting.
- Section 6 – Local cumulative impact policies. This sets out this authority's approach to cumulative impact and defines the boundaries of the current special policy areas and the classifications of premises to which they apply. To be read in conjunction with Appendix B to the policy
- Section 7 – Hours of operation. This provides a guide to the hours of licensed operation that this authority might consider appropriate by type of premises and (planning) area classification.
- Section 8 – The prevention of crime and disorder. This provides general guidance on the promotion of the first licensing objective.
- Section 9 – Public safety. This provides general guidance on the promotion of the second licensing objective
- Section 10 – The prevention of nuisance. This provides general guidance on the promotion of the third licensing objective
- Section 11 – The protection of children from harm. This provides general guidance on the promotion of the fourth licensing objective.

25. The purpose of Southwark's statement of licensing policy is to make clear to applicants what considerations will be taken into account when determining applications and should act as a guide to the sub-committee when considering the applications. However, the sub-committee must always consider each application on its own merits and allow exceptions to the normal policy where these are justified by the circumstances of the application.

26. Within Southwark's statement of licensing policy, the premises are identified as being outside of a cumulative impact zone and as situated within a residential area. Relevant closing times recommended in the statement of licensing policy for licensed premises in residential areas are as follows:

- Public houses, wine bars or other drinking establishments / restaurants and cafes:
- Monday to Sunday 23:00

- Night Clubs (with sui generis planning classification) are not considered appropriate for this area

Resource implications

27. A fee of £190.00 has been paid by the applicant company in respect of this application being the statutory fee payable for premises within non-domestic rateable value bands D/E.

Consultation

28. Consultation has been carried out on this application in accordance with the provisions of the Licensing Act 2003. A public notice was published in a local newspaper and similar notices were exhibited outside of the premises for a period of 28 consecutive days.

Community impact statement

29. Each application is required by law to be considered upon its own individual merits with all relevant matters taken into account.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Law and Democracy

30. The sub-committee is asked to determine the application for a premises licence under section 17 of the Licensing Act 2003.
31. The principles which sub-committee members must apply are set out below.

Principles for making the determination

32. The general principle is that applications for premises licence applications must be granted unless relevant representations are received. This is subject to the proviso that the applicant has complied with regulations in advertising and submitting the application.
33. Relevant representations are those which:
- Are about the likely effect of the granting of the application on the promotion of the licensing objectives
 - Are made by an interested party or responsible authority
 - Have not been withdrawn
 - Are not, in the opinion of the relevant licensing authority, frivolous or vexatious.
34. If relevant representations are received then the sub-committee must have regard to them, in determining whether it is necessary for the promotion of the licensing objectives to:
- To grant the licence subject to:
 - The conditions mentioned in section 18 (2)(a) modified to such extent as the licensing authority considers necessary for the promotion of the licensing objectives
 - Any condition which must under section 19, 20 or 21 be included in the licence
 - To exclude from the scope of the licence any of the licensable activities to which the application relates

- To refuse to specify a person in the licence as the premises supervisor
- To reject the application.

Conditions

35. The sub-committee's discretion is thus limited. It can only modify the conditions put forward by the applicant, or refuse the application, if it is necessary to do so. Conditions must be necessary and proportionate for the promotion of one of the four licensing objectives, and not for any other reason. Conditions must also be within the control of the licensee, and should be worded in a way which is clear, certain, consistent and enforceable.
36. The four licensing objectives are:
 - The prevention of crime and disorder
 - Public safety
 - The prevention of nuisance
 - The protection of children from harm
37. Members should note that each objective is of equal importance. There are no other licensing objectives, and the four objectives are paramount considerations at all times.
38. Conditions will not be necessary if they duplicate a statutory position. Conditions relating to night café and take away aspect of the license must relate to the night time operation of the premises and must not be used to impose conditions which could not be imposed on day time operators.
39. Members are also referred to the Home Office revised guidance issued under section 182 of the Licensing Act 2003 on conditions, specifically section 10.

Reasons

40. If the sub-committee determines that it is necessary to modify the conditions, or to refuse the application for a premises licence application, it must give reasons for its decision.

Hearing procedures

41. Subject to the licensing hearing regulations, the licensing committee may determine its own procedures. Key elements of the regulations are that:
 - The hearing shall take the form of a discussion led by the authority. Cross examination shall not be permitted unless the authority considered that it is required for it to consider the representations.
 - Members of the authority are free to ask any question of any party or other person appearing at the hearing.
 - The committee must allow the parties an equal maximum period of time in which to exercise their rights to:
 - Address the authority
 - If given permission by the committee, question any other party.
 - In response to a point which the authority has given notice it will require clarification, give further information in support of their application.
 - The committee shall disregard any information given by a party which is not relevant to the particular application before the committee and the licensing objectives.

- The hearing shall be in public, although the committee may exclude the public from all or part of a hearing where it considers that the public interest in doing so outweighs the public interest in the hearing, or that part of the hearing, taking place in private.
 - In considering any representations or notice made by a party the authority may take into account documentary or other information produced by a party in support of their application, representations or notice (as applicable) either before the hearing or, with the consent of all the other parties, at the hearing.
42. This matter relates to the determination of an application for a premises licence under section 17 of the Licensing Act 2003. Regulation 26(1) (a) requires the sub-committee to make its determination at the conclusion of the hearing.

Council's multiple roles and the role of the licensing sub-committee

43. Sub-committee members will note that, in relation to this application, the council has multiple roles. Council officers from various departments have been asked to consider the application from the perspective of the council as authority responsible respectively for environmental health, trading standards, health and safety and as the planning authority.
44. Members should note that the licensing sub-committee is meeting on this occasion solely to perform the role of licensing authority. The sub-committee sits in quasi-judicial capacity, and must act impartially. It must offer a fair and unbiased hearing of the application. In this case, members should disregard the council's broader policy objectives and role as statutory authority in other contexts. Members must direct themselves to making a determination solely based upon the licensing law, guidance and the council's statement of licensing policy.
45. As a quasi-judicial body the licensing sub-committee is required to consider the application on its merits. The sub-committee must take into account only relevant factors, and ignore irrelevant factors. The decision must be based on evidence, that is to say material, which tends logically to show the existence or non-existence of relevant facts, or the likelihood or unlikelihood of the occurrence of some future event, the occurrence of which would be relevant. The licensing sub-committee must give fair consideration to the contentions of all persons entitled to make representations to them.
46. The licensing sub-committee is entitled to consider events outside of the premises if they are relevant, i.e. are properly attributable to the premises being open. The proprietors do not have to be personally responsible for the incidents for the same to be relevant. However, if such events are not properly attributable to the premises being open, then the evidence is not relevant and should be excluded. Guidance is that the licensing authority will primarily focus on the direct impact of the activities taking place at the licensed premises on members of the public, living, working or engaged in normal activity in the area concerned.
47. Members will be aware of the council's code of conduct which requires them to declare personal and prejudicial interests. The code applies to members when considering licensing applications. In addition, as a quasi-judicial body, members are required to avoid both actual bias, and the appearance of bias.

The sub-committee can only consider matters within the application that have been raised through representations from other persons and responsible authorities. Other persons must live in the vicinity of the premises. This will be decided on a case to case basis.

48. Under the Human Rights Act 1998, the sub-committee needs to consider the balance between the rights of the applicant and those making representations to the application when making their decision. The sub-committee has a duty under section 17 Crime and Disorder Act 1998 when making its decision to do all it can to prevent crime and disorder in the borough.
49. Other persons, responsible authorities and the applicant have the right to appeal the decision of the sub-committee to the magistrates' court within a period of 21 days beginning with the day on which the applicant was notified by the licensing authority of the decision to be appealed against.

Guidance

50. Members are required to have regard to the Home Office revised guidance in carrying out the functions of licensing authority. However, guidance does not cover every possible situation, so long as the guidance has been properly and carefully understood, members may depart from it if they have reason to do so. Full reasons must be given if this is the case.

Strategic Director of Finance and Governance

51. The head of regulatory services has confirmed that the costs of this process over and above the application fee are borne by the service.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Licensing Act 2003 Home Office Revised Guidance to the Act Secondary Regulations Southwark statement of licensing Policy Case file	Southwark Licensing, C/O Community Safety & Enforcement, 160 Tooley Street, London SE1 2QH	Kirty Read Tel: 020 7525 5748

APPENDICES

Name	Title
Appendix A	Application for a premises licence
Appendix B	Representations submitted by responsible authorities
Appendix C	Notice of Decision from 12 May 2015
Appendix D	Notice of Decision from 18 January 2016
Appendix E	Copy of current premises licence
Appendix F	Map of the local area

AUDIT TRAIL

Lead Officer	Deborah Collins, Strategic Director of Environment and Social Regeneration	
Report Author	Andrew Heron, Principal Licensing Officer	
Version	Final	
Dated	13 September 2017	
Key Decision?	No	
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	No	No
Date final report sent to Constitutional Team		14 September 2017