

Item No. 17.	Classification: Open	Date: 12 March 2019	Meeting Name: Cabinet
Report title:		Land adjoining the Hollington Club at 56-60 Comber Grove SE5	
Ward(s) or groups affected:		Camberwell Green	
Cabinet Member:		Councillor Victoria Mills, Finance, Performance and Brexit	

FOREWORD - COUNCILLOR VICTORIA MILLS - CABINET MEMBER FOR FINANCE, PERFORMANCE AND BREXIT

The Hollington Club began as a club for fatherless boys in Camberwell around 120 years ago. Since then it has been a valuable community asset and has been located at 56-60 Comber Grove since the 1950s. Unfortunately the club is currently closed due to a reduction in donations as well as a poor return on its financial investments.

The Council is keen to support good quality youth provision and to help the Hollington Club re-open and become a financially sustainable organisation fit for the next 120 years. We are therefore supportive of their proposal to work with a development partner to enable the re-provision of new, better community and sports facilities alongside 45 residential units of which 35 percent will be required to be affordable (with 70 percent of affordable units at social rent).

By amalgamating a small piece of council-owned land which adjoins the Hollington Club, with the land already owned by the Club, a better and more efficient mixed-use development is possible. This will enable more space for the youth, sports and arts facilities as well as much needed housing.

The Hollington Club and its development partner will have to meet all our robust planning requirements to provide the very best quality development. The freehold of the council land will not be transferred until planning permission is granted with legal agreement to deliver 35 percent affordable housing across the whole development. A covenant will be placed on the council land to bind successors in title to the affordable housing requirement.

The money generated from the sale of the council land will provide a vital source of income for the council's Housing Revenue Account and fund our own ambitious council house building programme.

RECOMMENDATIONS

1. That Cabinet confirms that the land shown edged in black on the OS plan at Appendix 1 that is currently held for housing purposes is no longer required for those purposes and approves the appropriation of the land to planning purposes following the grant of planning permission to facilitate the carrying out of the development proposals in accordance with section 226 of the Town and Country Planning Act 1990 and sections 122(1) and 122 (2A) of the Local Government Act 1972.

2. That Cabinet approves the sale of the land amounting to approximately 200 sq. m shown edged in black on the OS plan at Appendix 1 to the adjoining owner of 56-60 Comber Grove SE5 and notes the capital receipt that will be generated by it.
3. That Cabinet confirms that following completion of appropriation of the land described at paragraph 1, the land shown edged in black at Appendix 1 can be sold freehold to facilitate the carrying out of development proposals for the area in accordance with section 233 of the Town and Country Planning Act 1990.
4. That Cabinet authorises the director of regeneration to negotiate and agree terms for a successful sale of the land shown edged in black on the OS plan at Appendix 1 with the adjoining land owner of 56-60 Comber Grove SE5 and its development partner.
5. That Cabinet note that formal, extensive consultation has been undertaken by the adjoining land owner of 56-60 Comber Grove SE5 and its development partner with key stakeholders, including residents and in consultation with ward members throughout the design development and further note resident engagement carried out by the council to comply with its statutory requirements under section 105 of the Housing Act 1985.

BACKGROUND INFORMATION

6. The land shown at Appendix 1 is owned freehold by the council and forms part of the Comber Grove and Wyndham Road Estate. The surrounding area is residential in nature with a mixture of architectural styles. The council is the predominate land owner.
7. On 28 November 2018, Council Assembly approved the Council Plan. This document builds on the Fairer Future promises approved by Council Assembly on 25 February 2015. One such commitment is to deliver good quality affordable homes to meet the needs of residents in the Borough. Within this commitment there is a policy to raise housing standards and build more quality homes. As part of the council's commitment to deliver more good quality homes, this development will provide 35% affordable housing in accordance with the Affordable Housing Policy defined in the Saved Southwark Plan Policies (2007) or New Southwark Plan (2019) and deliver a capital receipt to be re-invested into existing or new housing stock.
8. The proposed development will also help the council build on other key commitments in the Council Plan by helping reduce health inequality and create a healthier life for residents, increase employment opportunities – both during the construction lifecycle and operation of the proposed, new sports facility - and improve youth club provision in this part of the Borough.
9. The adjoining land owner and its development partner have extensively engaged with residents but there will be another opportunity for residents to influence the design development through further resident engagement. It is expected a planning application is submitted in springtime 2019 by the adjoining owner and its development partner.
10. The adjoining owner and its development partner have engaged in three pre-application meetings with the Local Planning Authority at the date of this

report. A further pre-application meeting is anticipated but it is expected the proposed development will provide a mixed-use scheme with potential for 5 to 7 floors to include the following accommodation:

- A multi-use sports hall and changing rooms
- A boxing gym
- Club room/ Café multi-functional space
- A domestic kitchen
- Meeting rooms
- Art room/ offices
- 73 secure cycle storage spaces
- 45 residential units (35% affordable accommodation by habitable rooms).

KEY ISSUES FOR CONSIDERATION

11. The amalgamation of the council's land with the adjoining Hollington Club (now closed) at 56-60 Comber Grove, London SE5 will enable the re-provision of new, better community and sports facilities to help reduce health inequality for residents and thereby improve youth club provision in the locality, promote better community cohesion, and provide good quality affordable homes in accordance with the Affordable Housing Policy defined in the Saved Southwark Plan Policies (2007) or New Southwark Plan (2019).
12. Initial negotiations have taken place between the adjoining land owner and its development partner and the council regarding the sale of the land described in paragraph 1. The council is satisfied that it has obtained best consideration that can reasonably be obtained with the terms agreed with the adjoining owner.
13. If the developer who will submit a planning application on behalf of the adjoining land owner were to achieve a higher density in planning terms than expected, a planning overage has been agreed so that if a higher density is achieved than the current quantum of private residential units indicated by pre-planning discussions with the Local Planning Authority, then the uplift in value is shared between the parties.
14. A disposition overage has also been agreed so that if a disposition of the private residential development by the developer takes place first within 5 - years of the overage period, the council will also share in a percentage of the sale proceeds.
15. The adjoining land owner has advised the council that due to a reduction in private donations and financial assistance from third party donors necessary to help run its Club as well as a poor return on its financial investments, the Hollington Club is now closed indefinitely. The Hollington Club has proved a valuable community asset with a presence in the Borough setting up a club for the benefit of fatherless boys in Camberwell around 120 years ago. It has maintained a presence at 56-60 Comber Grove since the 1950s.
16. To ensure it maintains a long-term future in the Borough, the Trustees of the Hollington Club considered it necessary to investigate partnering with the private sector to build a facility that proves sustainable rather than pursue a refurbishment and up-grade of its existing facilities.

17. The developer has entered into a contractual arrangement with the adjoining land owner whereby the developer pays the adjoining land owner an upfront capital sum for its land. The adjoining land owner will in turn pay a financial sum to the council for its land out of its land receipt.
18. The developer will build out the whole development in accordance with its planning consent and retain the private housing to be sold at market value for its profit. The risk in selling the private housing will therefore be transferred to the developer but it will help cross-subsidise the building of the new community and sports facility and affordable housing. The affordable housing will be sold on a long-term lease by the developer to a registered housing provider. The community and sports facilities will be built out by the developer and transferred to the adjoining land owner to retain and manage.
19. The land value received by the adjoining land owner will be re-invested towards fit out and operational costs for the new community and sports facility. A management company will be set up to collect the revenues from the ground rent of the private and intermediate sales, manage and administer service charge of communal areas. The revenues from the ground rents will be re-invested into the running of the new facilities as well.
20. The requirement for the delivery of 35% affordable homes is a requirement of planning policy however the developer can often make a viability case that this figure is not justifiable. To ensure compliance with council planning policy, the council will require the buyer in a conditional contract to provide 35% affordable housing. The mix of affordable units will be required to be planning policy compliant. As proposed, the development will be required to deliver 70% of the affordable units as social rented and 30% as intermediate as defined by the Saved Southwark Plan Policies (2007) or new Southwark Plan (2019).
21. The freehold of the council land will not be transferred to the adjoining land owner until a planning permission is granted with legal agreement to deliver 35% affordable housing across the whole development and appropriation has taken place. A covenant will be placed on the council land to bind successors in title to the affordable housing requirement to the benefit of the retained surrounding council-owned land.
22. A preliminary assessment carried out by the developer has identified that there will be a marginal impact on loss of sunlight and daylight to some adjoining properties as a result of the proposed development. The developer is finalising the detail for the design of the proposed development and will submit as part of a planning application a detailed assessment for day light and sunlight in full compliance of British Research Establishment Guidelines.
23. The assessment will calculate if there is an infringement of daylight enjoyed by nearby residents. This will not be a degree to have caused refusal of the proposed development because affected persons may apply to court for an injunction to stop it proceeding. An application for an injunction will cause delay and uncertainty and may frustrate the development. The risk and costs of an injunction would be borne by the adjoining land owner or developer.
24. The council land might be used by some residents in the locality as an area of recreation. The risk therefore is that one or more residents may have acquired a prescriptive right of way or easement over the land.

25. There are also a number of residents who purchased their council properties under right to buy legislation on the surrounding estate and have acquired a general right or reservation across the council land under the terms of their lease. In general terms, a prescriptive right or easement is acquired where a person gains use or ownership rights over the land by way of a period of use. Such rights are not necessarily required to be registered at the Land Registry so may only emerge when interfered with. This presents a potential risk to the proposed development as the beneficiary of such a right may seek to enforce it by applying to the court for an injunction to halt the development that is interfering with the right. The appropriation for planning purposes will enable any third party rights - whether acquired by prescription or acquired under a right to buy lease - to be overridden as more particularly described below in paragraph 26.

Appropriation

26. The appropriation of land refers to the process whereby a council alters the purpose for which it holds land. Where land has been appropriated for planning purposes, third party rights including rights of light and prescriptive rights of way enjoyed over the land can be overridden. The beneficiaries of such rights may however claim compensation equal to the loss in value of their property caused by losing the right but cannot seek an injunction to delay or halt the development. This will give a council certainty that a developer having commenced construction on its land, a person with the benefit of an unregistered right over land (such as a right to light or prescriptive right of way) cannot apply to the court to halt the development. This is a very important tool in enabling development to proceed on urban land. As mentioned, the beneficiary of any such right is entitled to financial consideration for the loss of the right. The developer could insure against such compensation claims but this could prove costly or accept the risk of an injunction that may be fatal to development or result in significant unquantifiable costs in compensation.
27. As mentioned, a person affected by the loss of sun or daylight may be entitled to compensation based on the value of their properties before the right has been infringed versus the value of their property with the infringed right. This compensation is based on diminution in value of the property of the affected property. If an agreement by negotiation is not possible a reference is made to the Upper Tribunal (Land Chamber).
28. In this case it is recommended that the council land is appropriated from housing purposes to planning purposes so that third party rights infringed by development cannot be enforced by injunction and it will allow construction to proceed.
29. The contract with the adjoining owner will need to contain a provision that if the land is appropriated that the buyer will fully indemnify the council against the costs of processing and meeting any compensation claims received.
30. The case for reasoning of the appropriation of the land shown in Appendix 1 is set out in Appendix 2 and Cabinet is recommended to approve appropriated proposed
31. The land shown edged in black on the OS plan at Appendix 1 is classified as non-statutory open space and before the council can appropriate the land its intention to do so must be advertised by way of a public notice for two

consecutive weeks in a local newspaper and it must consider any objections made as a result of the intention to appropriate. Public notices advertising the council's intention to appropriate the land edged in black on the OS plan at Appendix 1 appeared on 22 and 29 November 2018 editions of the Southwark News

32. The deadline for receipt of representations was set for 4:00pm on 20 December 2018.
33. The council did receive a single request for a copy of the OS plan showing the council land to be appropriated for planning purposes but no representations were received before the deadline and that remained the case on the 28 February 2019.
34. Note if any representations are received, these will be reported verbally to Cabinet on 12 March 2019.

Surplus declaration as to operational requirements

35. The land shown edged in black on the OS plan at Appendix 1 subject to appropriation has now been declared surplus to operational requirements by the Housing Regeneration Manager and Director of Regeneration for the council on 6 February 2019.

Rationale for recommendations

36.
 - a. To mitigate against the development being frustrated or delayed by injunctions
 - b. To de-risk the development so as to encourage the optimum density and delivery of affordable homes
 - c. Appropriate the council land for planning purposes
 - d. Building on key commitments in the Council Plan 2018-22.

Community impact statement

37. The Council Plan was the subject of extensive community consultation as was the Fairer Future Promises that gave rise to building more quality affordable homes and creating a healthier borough to live in. The recommendations contained herein will enable the construction of 45 new homes (as defined by the Saved Southwark Plan Policies (2007) or emerging Southwark Plan 2019) and Residential Design Guidelines (SPD), new, better sports and community facilities which will help improve resident's quality of life, increase youth club provision in the locality and more employment opportunities through the construction programme and running of the new Hollington Club.
38. To promote community inclusion and encourage resident participation in the design detail for the proposed development, a series of events were held which began in early 2017 led by the developer and the adjoining land owner, supported by ward councillors and the architect for the adjoining land owner involving members of the Wyndham and Comber Tenants & Residents Association (T&RA) and Wyndham and Redcar Steering Groups.

39. An event held by the council's housing department was organised in January 2019 with the Wyndham and Comber T&RA to consult specifically on the sale of the council land. To comply with Section 105 of the Housing Act 1985, the council has a legal obligation to consult its secure tenants on matters of housing management such as changes to the management, maintenance, improvement or demolition of houses let by them, or changes in the provision of amenities. In this case there will be a change in provision of non-statutory open space used by residents on the Wyndham and Comber Estate which affects its secure tenants.
40. At the event in January 2019, it was made clear to residents that the proposed development would involve the sale of council-owned land delineated on a display board showing the design, and that it would no longer be able to be used as open or amenity space by residents of the Estate.
41. The response from residents proved uncontroversial with no substantive concerns or objections to the sale of council land but a few points of concern raised by residents were noted below.

Responses	Mitigation
Some residents sit on the perimeter wall of the amenity land in the summer months	The loss of non statutory open space will be mitigated through re-provision of a new, better community and sports facility
A resident mentioned disruption during construction of the new Hollington Club	Construction methods will be addressed as part of planning process
Availability of affordable housing for key workers and local people	The council has developed a allocation policy and affordability criteria for key workers which is a key determinant of planning policy
Quantum and proposed mix of affordable housing	35% affordable: 70% affordable units socially rented and 30% as intermediate as defined by the Saved Southwark Plan Policies (2007) or New Southwark Plan (2019)
Loss of sun lighting and daylighting due to height of proposed development	The developer is finalising a review of the design development which would include a detailed assessment of loss of sunlight or daylight on each surrounding property for the planning application but a preliminary assessment of loss of sunlight or daylight has identified that the proposed development has a marginal impact on the adjacent properties; the developer will visit residents concerned about a compromised or loss of sunlight or daylighting for a 1-2-1 meeting if deemed necessary
Financial sustainability of Hollington Club (staffing costs, affordability of using the new facility for residents)	Costs of using new facility will be affordable to residents with different types of pricing structures available to residents dependent on individual circumstances; residents assured that revenues from sale of the Hollington Club will be re-invested into the running of the new club but that funding sources are to be explored further to ensure its sustainability; the developer takes risk of selling private housing from sale of former Hollington Club, not the owner of the Hollington Club who will receive a consideration for its land from its developer

Responses	Mitigation
	partner to be re-invested in the new club.
Design issues (scale and massing)	Residents will be given a opportunity to consult with the developer further on its design and a further pre-application meeting with the Local Planning Authority is planned ahead of submission of a planning application to be determined by robust planning requirements.

42. As mentioned, the developer has agreed with residents who attended the consultation in January 2019 to hold a further consultation event to be held prior to the submission of a planning application in spring 2019 where the developer can explain the design details again and residents can comment further on the design development.

43. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 is a positive duty to promote equality in all areas relevant to equality. It is a duty on public authorities to have, in the exercise of their functions, due regard to three “needs” which are central to the aims of the Act:

- a) The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
- b) The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
 - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
 - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low
 - Ensure that steps are undertaken to take into account the different needs of disabled people where different to the needs of non-disabled people.
- c) The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

44. The protected characteristics are set out below:

- Race
- Age
- Gender reassignment
- Pregnancy and maternity
- Disability
- Sexual orientation
- Religion or belief
- Sex
- Marriage and civil partnership.

45. In carrying out the redevelopment of the council land, the council must have regard to the potential impacts of redevelopment on any group of persons sharing a protected characteristic in order to discharge its public sector equality duty.
46. Based on the available information to date the council does not believe that there are any particular groups sharing a protected characteristic that will be adversely affected or disadvantaged by the proposals. As mentioned, the sale of the council land will enable re-provision of new, better community and sports facilities to promote better social inclusion and greater participation in using these new facilities and thereby reduce health inequalities and improve youth club provision in the locality. The impact of the loss of non-statutory open space on the Estate will therefore be mitigated by re-provision of new, better community and sports facilities in keeping with a key council commitment set out in the Council Plan 2018-22.

Financial implications

47. Please see closed report.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Law and Democracy

48. The report recommends the appropriation of council-owned land currently held for housing purposes to planning purposes.
49. A council holds land and property for a variety of statutory purposes in order to perform its functions. A council is authorised by virtue of section 122 of the Local Government Act 1972 ("the 1972 Act") to appropriate land within its ownership for any purpose for which it is authorised to acquire land by agreement, where is no longer required for the purpose for which it is held immediately before the appropriation.
50. The land must already belong to the council. Paragraph 6 of the report confirms that the land to be appropriated is in the council's freehold ownership.
51. The land must be no longer required for the purpose for which it is currently held. The report confirms at paragraph 1 of Appendix 2 that the land is no longer required for housing purposes.
52. The purpose for which the council is appropriating the land must be authorised by statute. It is proposed that the land is held for planning purposes. This is a purpose which is authorised by statute. Section 246 of the Town and Country Planning Act 1990 ("TCPA 1990") defines such purposes as, inter alia, those for which can be acquired under ss226 or 227 of that Act. Section 227 provides that a council may acquire land by agreement for any purposes for which it is authorised to acquire land compulsorily by s226 TCPA 1990.
53. The purposes for which a council can acquire land pursuant to ss226 TCPA 1990 include purposes "which it is necessary to achieve in the interests of the proper planning of an area in which the land is situated". S226 also authorises the acquisition of land "... if the authority think that the acquisition will facilitate the carrying out of development, re-development or improvement on or in relation to the land". In the case of either s226 or s227 the acquiring authority

must be satisfied that whatever development proposals it has for the land in question these are likely to “contribute to the achievement of any one or more of the following objects – (a) the promotion or improvement of the economic well-being of their area; (b) the promotion or improvement of the social well-being of their area; (c) the promotion or improvement of the environmental well-being of their area”.

54. The report sets out at paragraph 3 of Appendix 2 that the proposal will facilitate the development, redevelopment or improvement or on in relation to the land.
55. Section 203 of the Housing and Planning Act 2016 came into force on 13 July 2016. This section contains a power to override easements and other rights, and it replaces s237 TCPA.

S203 says:

- “(1) A person may carry out building or maintenance work to which this subsection applies even if it involves:
- (a) Interfering with a relevant right or interest
 - (2) Subsection (1) applies to building or maintenance work where:
 - (a) There is planning consent for the building or maintenance work;
 - (b) The work is carried out on land that has at any time on or after the day on which this section comes into force:
 - (i) become vested in or acquired by a specified authority; or
 - (ii) been appropriated by a local authority for planning purposes as defined by section 246(1) of the Town and Country Planning Act 1990 [i.e. for purposes for which an authority can acquire land under ss226 and 227]
 - (c) the authority could acquire the land compulsorily for the purposes of the building or maintenance work; and
 - (d) the building or maintenance work is for purposes related to the purposes for which the land was vested, acquired or appropriated as mentioned in paragraph (b)”.

56. What this means is that where land has been appropriated for planning purposes building work may be carried out on land even if this interferes with rights or interests if there is planning consent for the building work; and the work must be for purposes related to the purposes for which the land was appropriated, in this case planning purposes. By s204 those third party rights are converted to an entitlement to compensation to be calculated in accordance with ss7 and 10 of the Compulsory Purchase Act 1965.
57. This report confirms at paragraph 21 that planning permission will be obtained for the works proposed to be done on the site and that works will be done in accordance with planning permission. Once the land has been appropriated and s203 triggered, that work will be authorised even where it interferes with

third party rights.

58. The liability to pay compensation is enforceable against the authority pursuant to s.204 of the Housing and Planning Act 2016. Accordingly an indemnity will need to be obtained from the buyer in respect of this.
59. Section 122(2A) of the 1972 Act provides that where land to be appropriated pursuant to section 122(1) forms part of an open space, a council must advertise their intention to appropriate the land in a local newspaper for two weeks and consider any objections to the proposed appropriation. The report confirms that notices were published in Southwark News on 22 and 29 November 2018 and no representations were received.
60. Section 233 of the Town and Country Planning Act 1990 states that where any land has been acquired or appropriated by local authority for planning purposes and is for the time being held for the purposes for which it was so acquired/appropriated the authority may dispose of the land to such person in such manner and subject to such conditions as appear to them to be expedient in order to:
 - (a) secure the best use of that or other land and any buildings or works which have, or are to be, erected, constructed or carried out on it (whether by themselves or by any other person); or
 - (b) secure the erection, construction or carrying out of it on any buildings or works appearing to them to be needed for the proper planning of the area of the authority.
61. The consent of the Secretary of State is also required where the disposal is to be for a consideration less than the best and reasonably obtainable, except for:
 - (a) the grant of a term of seven years or less; or
 - (b) the assignment of a term of years of which seven years or less are unexpired at the date of the assignment.
62. The report consents in paragraph 12 that the council is satisfied that it has obtained the best consideration that can reasonably be obtained with the terms agreed with the adjoining owner.

Strategic Director of Finance and Governance (FC18/038)

63. This report is requesting cabinet to approve the appropriation of the land shown edged in black in Appendix 1, which is no longer required for housing purposes for planning purposes to facilitate the development proposals as detailed in the report. The report is also requesting cabinet to approve the sale of this land to the adjoining landowner. Full details of the recommendations are contained in paragraphs 1-4.
64. The strategic director of finance and governance notes that the above land has been declared surplus to requirements by the Housing and Modernisation department. It is also noted that this development proposal will provide 35% affordable housing in accordance with the housing policy and will also enable the re-provision of better community and sport facilities for local residents.

65. The strategic director of finance and governance also notes that the transfer of the freehold land to the adjoining landowner is subject to the planning permission being granted with a legal agreement to deliver 35% affordable housing across the development and a covenant will be placed on the council land to bind any successive owners to this affordable housing requirement. It is noted that the council is satisfied that it has obtained best consideration with the financial terms agreed on this proposal.
66. Full details of the financial implications are contained within the closed version of this report but it is noted that the proposed land appropriation between the housing revenue account and the general fund is proposed to occur in such a way that it will have a neutral financial impact.
67. Staffing and any other costs relating to this report to be contained within existing departmental revenue budgets.

Background Papers	Held At	Contact
Council Assembly report of 25 February 2015 adopting the council plan	Southwark Website	Paula Thornton 020 7525 4395
Link : http://moderngov.southwark.gov.uk/mgConvert2PDF.aspx?ID=75950&ISATT=1#search=%22council%20plan%22d		

APPENDICES

No	Title
Appendix 1	OS plan showing the council-owned land edged in black
Appendix 2	Appropriation of the land shown edged in black at Appendix 1 for purposes set out in s226 of the Town and Country Planning Act 1990 and the rationale for appropriation

AUDIT TRAIL

Cabinet Member	Councillor Victoria Mills, Member for Finance, Performance and Brexit	
Lead Officer	Kevin Fenton, Strategic Director of Place and Wellbeing	
Report Author	Marcus Mayne, Principal Surveyor	
Version	Final	
Dated	12 March 2018	
Key Decision?	Yes	
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
Date final report sent to Constitutional Team		1 March 2019