Item No.	Classification: Open	Date: 23 July 2019	Meeting Name: Cabinet Member for Environment, Transport and the Climate Emergency
Report title:		East Dulwich and Peckham West controlled parking zone	
Ward(s) or groups affected:		Goose Green; Rye Lane	
From:		Director of Environment	

RECOMMENDATION

- 1. That the Cabinet Member for Environment, Transport and the Climate Emergency:
 - Approves the implementation of a parking zone in the East Dulwich and Peckham West area (Appendix 1), operating Monday to Friday, 9am to 11am, subject to a positive outcome from statutory consultation.
 - Approves the delegation of decisions relating to further minor amendments to the detailed engineering design to officers.
 - Requires the extension of statutory consultation to longer than the minimum 21 days to allow consideration of the recommendations and to account for overlap with school holiday time if applicable.
 - Instructs officers to bring any representations that cannot be entirely dealt with back before the cabinet member for determination.
 - Instructs officers to review the zone operation within six to nine months of implementation (Subject to the outcome of necessary statutory procedures).
 - Notes the public realm improvements included in the scheme design under the healthy streets approach.
 - Notes the financial implications of delivery detailed in the report.

BACKGROUND INFORMATION

- 2. This report draws upon the detailed analysis of results from a consultation held in January and February 2019 (Appendices 2 and 3) as well as feedback received during May 2019 to the interim consultation reports, best practice in parking design, government legislation, policy, and financial considerations.
- 3. The 2018-19 strategic parking project programme was approved by the Head of Highways in conjunction with the cabinet member and included consultation in two study areas in East Dulwich and Peckham based on a high number (over 50) relative to other areas in the borough of unsolicited requests for a parking zone. The requests were from streets mainly in proximity to train stations but in

East Dulwich the boundary was extended to a main road (Barry Road) to find out over a wider area whether residents and businesses wanted a zone in their street.

- 4. In the past, parking zone consultations were held in the area around East Dulwich station (2003 and 2012) however the decision in each case was for the zone to not be taken forward to statutory consultation due to the lack of majority support from respondents with support only in isolated streets.
- 5. In recent years the wider area has seen parking zones implemented with majority support: Herne Hill zone (HH), North Dulwich and Denmark Hill zone (P), Peckham Road South zone (PR) and Dog Kennel Hill zone (Q). Peckham zone (B) is historic, implemented in 1975. These zones are in close proximity to Transport for London (TfL) zone 2 train stations Peckham Rye, East Dulwich and North Dulwich.
- 6. Southwark's coverage of parking zones, according to a study by Appy Parking looking at % length of roads covered by zones, is at 53%, behind boroughs such as Camden (100%), Tower Hamlets (98%), Newham (90%) and Hackney (89%), as well as neighbouring Lambeth (63%). Currently it is ranked 12th out of the 13 inner London boroughs. Two outer boroughs (Haringey and Brent) are ahead of Southwark in terms of parking zone coverage meaning Southwark is ranked 14th out of the 33 London boroughs.
- 7. Average car ownership in inner London boroughs is 0.6 cars per household. Car ownership in the East Dulwich area, based on the postcode area of SE22, is estimated at 0.7 cars per household. Borough-wide, car ownership is estimated at 0.5 cars per household and has decreased by 7% in the last decade.
- 8. Parking pressure in the area is due to a number of reasons. Commuter parking in the study areas is likely due to the presence of the last remaining free parking space adjacent to TfL zone 2 stations in the area, and the high number of schools and work places in the area. Streets in the study areas have also been reportedly used as storage for commercial vehicles such as trade vehicles and taxis and for vehicles belonging to holiday makers.
- 9. Recently implemented parking zones, in Peckham Road South and in Bermondsey, have resulted in a reduction of street parking by at least 40%.
- 10. There is a large body of international and national evidence that traders routinely overestimate the importance of car drivers and passengers to trade. TfL has produced an evidence base on this for London, references to which were provided with the consultation material and a 2015 high street study conducted by Southbank University found that 22% of visitors drove to Lordship Lane. A recent survey conducted by the council in March 2019 found that an even smaller proportion of visitors to Lordship Lane and North Cross Road drove or used a taxi: 4% in the week and 9% at the weekend.
- 11. Transport is a major contributor to air quality, contributing 51% to NOx pollution in London. Levels over the EU limits for NO2 have been recorded in Melbourne Grove and in Grove Vale.
- 12. Electric vehicles reduce emissions and noise pollution, but they do not reduce particulate matter pollution from road, tyre and brake wear, which is linked to asthma and death. Moreover, the use of electric vehicles contributes to traffic

- congestion and car dominance on streets, low physical activity and related health issues.
- 13. Public Health England guidelines encourage local government to improve infrastructure for active travel such as minimising parking, creating walking friendly street layouts and retro-fitting streets for cycle parking. They encourage working with schools and workplaces on travel planning to promote safe modes of active travel to and from settings on a daily basis.
- 14. Parking zones are recognised as a key measure that local authorities can implement to tackle congestion and change travel behaviour.

KEY ISSUES FOR CONSIDERATION

Proposals for consideration

- 15. In light of the considerations in the below paragraphs, the following recommendations are proposed to balance the various concerns of residents, businesses and the community:
 - One combined zone named "East Dulwich and Peckham West zone" including the omission of streets in the East Dulwich area as recommended by Dulwich community council.
 - 2) For this zone to operate Monday to Friday for two hours 9am -11am
 - 3) For the layout to include design amendments and healthy street options as requested by residents in response to the proposed designs, where feasible.
 - 4) For a consultation to be held within six to nine months of implementation to review whether the boundary and operational days and time are adequate, and whether the design needs to be amended.

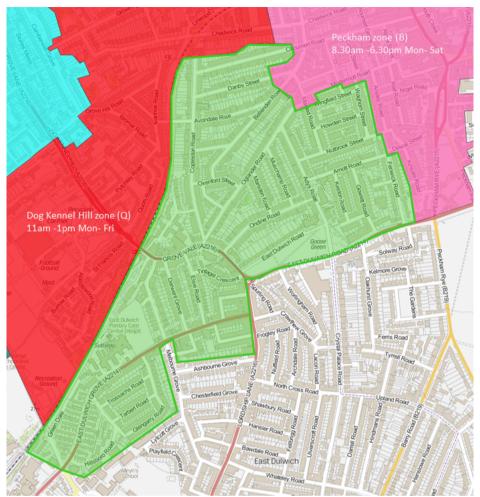


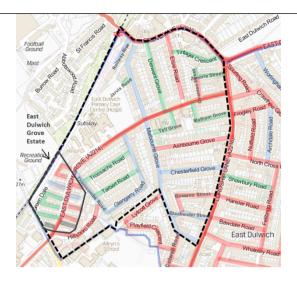
Figure 1 Proposed Peckham West and East Dulwich zone (green)

16. Officers will allow statutory consultation to be held for longer than the minimum 21 days to allow consideration of the recommendations and to account for overlap with school holiday time if applicable.

Interim recommendations

17. Informal public consultation in the East Dulwich area resulted in the following recommendations included in an interim report for discussion at community council.

Interim Recommendation – East Dulwich	Reason/source
A parking zone 'Melbourne Grove zone' to be implemented	There was majority support
in the area bordered by and including Grove Vale, by the	(54%) for a zone from
western boundary of the study area, by and excluding	respondents in this [Melbourne
Lordship Lane and excluding a small group of side streets to	Grove] area
Melbourne Grove in the south of the area (Lytcott Grove,	
Playfield Crescent and Colwell Road).	



Melbourne Grove zone to operate all day 8.30am to 6.30pm, Monday to Friday comprising different types of bays including permit and paid (visitors able to pay for up to 4 hours, £2.75 per hour for petrol, £3.25 per hour for diesel), short stay bays (see below), and permit only parking, as per revised proposed design (see 'Parking zone – design' section below).

The highest number of respondents from the streets in the Melbourne Grove area selected 8.30am to 6.30pm and Monday to Friday operation, compared to other times and days of operation. The majority of respondents in this area also stated they had difficulty parking Monday to Friday.

Short stay bays located in Grove Vale, Melbourne Grove, Tintagel Crescent, Matham Grove, Ashbourne Grove, Chesterfield Grove, extended to two hours paid (£2.75 per hour for petrol, £3.25 per hour for diesel free first half hour) except for existing 3 hour short stay bays in Melbourne Grove to be retained as 3 hour and paid (with first half hour free).

The highest number of respondents from the wider study area (690, or 26%) requested extension of short stay bays to two hours. Lordship Lane high street study from 2015 found that a large proportion of visitors stayed two hours.

Grove Vale resident association requested three hour short stay bays retained.

 Informal public consultation in the Peckham West area resulted in the following recommendations included in an interim report for discussion at community council.

Interim Recommendation - Peckham West Reason/source A parking zone to be implemented in the whole 'Peckham' There was majority support (56%) West' study area for a parking zone from respondents in the study area when adjusted to include those that would change their mind if a zone was to be implemented in neighbouring street. Zone to operate all day 8.30am to 6.30pm, Monday to The highest number of Friday comprising different types of bays including permit respondents selected 8.30am to and paid (visitors able to pay for up to 4 hours. £2.75 per 6.30pm compared to other times hour for petrol, £3.25 per hour for diesel), short stay bays and days of operation, and the (see below), and permit only parking, as per revised majority selected Mon-Fri proposed design (see 'Parking zone – design' section operation. below). Short stay bays extended to two hours paid with free first The highest number of respondents from the study area half hour. requested extension of short stay bays to 2 hours.

Petitions and deputations

- A petition of around 8,000 signatures was sent by the East Dulwich Independent Business Association (EDIBA) and a deputation attended the Council Assembly 27 March 2019.
- 20. A letter of support from residents in the area around the station, including 62 signatories, was sent to officers and a deputation attended the Council Assembly 27 March 2019.

Dulwich Community Council

- 21. On 27 April 2019 the Dulwich Community Council was consulted at the forum meeting. Comments received included:
 - For the proposed 'Melbourne Grove' area to exclude a number of streets adjacent to Lordship Lane where there was no evident majority (Blackwater Street, Bassano Street, Chesterfield Grove, Ashbourne Grove and Melbourne Grove south of East Dulwich Grove)
 - For the area to be named 'East Dulwich Grove zone'.

- Peckham West zone to exclude Ondine Road and East Dulwich Road
- Hours of operation reduced to 2 hours in the Peckham West study area.

Peckham and Nunhead Community Council

22. Peckham and Nunhead Community Council did not hold a meeting after the interim report was published and therefore we were unable to engage using this forum due to meeting schedule limitations; ward members were invited to comment, and all feedback that was received was considered.

Informal community meetings

- 23. Two informal community meetings were organised by community members from Peckham in May 2019 with the first being attended by and chaired by a Ward councillor. Officers responded to questions and a number of points were presented to officers in May and June 2019, summarised below:
 - For the proposed 'Peckham West' area to exclude streets where there was no evident majority and for streets close to existing zones to be retained.
 - Hours of operation reduced to 2 hours
 - For the zone to be combined with the East Dulwich revised zone

Revised consultation reports

24. Details of the consultation results can be found in the consultation report (Appendix 2 for East Dulwich and Appendix 3 for Peckham West). Analysis has been updated to reflect the revised proposed zone boundary for the East Dulwich study area to include street by street results.

Revised parking zone boundary

- 25. A combined zone is proposed comprised of a revised East Dulwich boundary and the whole Peckham West study area boundary to ensure an adequate operational size. The revised East Dulwich boundary is based on consultation responses for each street and feedback from the community council to the interim boundary proposed in April 2019. The whole of the Peckham West study area is proposed based on majority support adjusted to include people changing their mind if a zone was implemented in an adjacent street.
- 26. Although Dulwich community council recommended the exclusion of Ondine Road and East Dulwich Road, officers consider that there is a high risk of parking displacement into these streets caused by the zone operating in surrounding streets and the proximity of stations. Inclusion of these streets preempts the inevitable requests for an extension to the new zone shortly after its implementation.
- 27. Officers have considered the operational effect of excluding streets (the section of Melbourne Grove south of East Dulwich Grove, Ashbourne Grove, Chesterfield Grove, Bassano Street and Backwater Street) as recommended by Dulwich Community Council that were included within the interim East Dulwich

proposed boundary. Although there is a moderate risk of the excluded streets being negatively impacted by parking displacement due to the proximity to train station (less than 10 min walk), the risk is not high as this group of streets is not otherwise surrounded by parking zones and parking displacement is likely to be shared with other streets in the area. Officers therefore consider that these streets can be excluded.

Revised time of operation

- 28. Two hour parking zone restrictions are considered adequate and operationally sound in the context of the following findings by council on other two hour zones:
 - A post implementation review in 2018 of North Dulwich and Denmark Hill zone (P) found that the majority of respondents were satisfied with the two hour zone operation despite the zone being close to major NHS medical services (Kings College hospital and South London and Maudsley hospital).
 - A 2018 study was conducted to check if pay by phone bays were being systematically abused by commuters in two hour zones and found that the occurrence of this was very rare.

Updated headline results

- 29. Officers analysed the consultation responses to the main question in the revised East Dulwich reduced area excluding Melbourne Grove south of East Dulwich Grove, Ashbourne Grove, Chesterfield Road, Bassano Street and Blackwater Street.
- 30. The headline results for the revised East Dulwich area:

		Do you want a parking zone?		
Area	Number of			
	responses	Yes	No	Undecided
Revised East	447	58%	35%	7%
Dulwich parking	447	30 /0	33/0	/ /0
zone				

31. The results for East Dulwich revised zone when adjusted to include those that would change their mind if an adjacent street had a zone implemented:

		Do you want a parking zone? Adjusted to change of mind.		
Area	Number of responses	Yes	No	Undecided
Revised East Dulwich parking zone	447	69%	28%	3%

32. The headline results for Peckham West to the main question – Do you want a parking zone in your street?:

		Do you want a parking zone?		
Area	Number of			
	responses	Yes	No	Undecided
Peckham West	783	43%	48%	9%

33. The results for Peckham West when adjusted to include those that would change their mind if an adjacent street had a zone implemented:

		Do you want a parking zone? Adjusted to change of mind.		
Area	Number of			
	responses	Yes	No	Undecided
Peckham West	783	54%	40%	6%

Revised street layout design

- 34. There are a significant number of representations from residents on Elsie Road against the parking zone due to the low number of proposed parking bay spaces in the design and the length of proposed double yellow lines across and adjacent to dropped kerbs. A site visit was conducted in June 2019 to engage with residents and to identify potential spaces that could be accommodated. As a result of the site meeting, officers are proposing to add three spaces on the western side and to reduce the length of double yellow lines each side of driveways on the eastern side of Elsie Road to one metre in order to accommodate approximately four spaces, bringing the total of additional spaces in Elsie Road to seven. The departure from our design standards and original proposals (2 metres) is deemed an acceptable compromise when considering the road safety risks (Appendix 4). The effectiveness and safety of the design will need to be monitored.
- 35. There was strong majority support for cycle parking in the carriageway at East Dulwich Road by the junction with Adys Road with 448 (57%) in favour, and also in Amott Road (433, 53% in support), and 181 people in support of alternative locations for cycle parking.
- 36. The highest proportion of respondents were in favour of a parklet (community seating and planting in a parking space) outside the church at Copleston Road, including support from the café at the church, and of a parklet in Adys Road with approximately 340 (42%) in support for each one compared to 240 (30%) against. There was majority support for the parklet at Zenoria Street with 245 (58%) residents of the revised East Dulwich area in favour with 101 against (24%). Residents in the street had mixed feelings (8 against, 5 in favour), and one business unsure. The wider study area had mixed feelings with 1011 in favour (41%) and 807 against (33%) and 26% undecided. Concerns were raised about the potential anti-social behavior at parklets due to their inclusion of communal seating.
- 37. Although not within the revised East Dulwich area, 'healthy streets' proposals in the wider area received strong support with the highest level of support received for planted screens (1889, or 74%, agreeing) at each of the two proposed locations, followed by places to rest (1449 and 1405, or 57% and 56% at

- Whately Road and Felbrigg Road), cycle stands (1293 to 1440, or 53 to 58% for each of the three locations) and finally parklets (1313, 52%, agreeing to the location on Lordship Lane).
- 38. Alternative places to rest were suggested by a number of residents within the revised recommended area with residents mentioning limitations in mobility of their own or that of their visitors and welcomed more frequent places to stop and rest to be able to reach local amenities, such as the high street, by foot.
- 39. Some residents who did not own a car requested parklets in front of their homes to accommodate their cycles and provide amenity and a number of residents requested that the design be led by residents.
- 40. Bus lane operation change proposed at Lordship Lane to include evening operation was supported by 1208 people (45% of respondents) and 1134 people wanted the bus lanes to remain the same. The bus lane falls outside of the revised recommended area.
- 41. The final designs recommended for implementation are in Appendix 1 and take into consideration all feedback requested in each street within the revised recommended area, where it was considered feasible, including
 - Adjustment of layout of bays and other parking restrictions in line with Southwark's streetscape design standards, industry best practice and the Equality Act 2010.
 - Reduction of double yellow lines at junctions to 7.5m in some locations
 - Addition of short stay bays in side roads (half hour free) and extension of existing half hour short stay bays within the area to allow two hours (retaining the first half hour free) with registration by pay by phone.
 - Passing space in Avondale Rise as per industry best practice to allow sufficient passing space for buses.
 - Measures to prevent school drop off activity by way of more effective enforcement (blips on double yellow lines in the vicinity of schools to operate during school drop-off and pick-up times)
 - Addition of cycle parking bays (cycle parking stands in the carriageway)
 - Addition of cycle hangars (secure cycle parking shelters in the carriageway)
 - Addition of motorcycle bay
 - Addition of places to stop and rest in new footway buildouts (see paragraph 42 below).
- 42. Places to stop and rest are proposed in line with Department for Transport and England Health guidelines, TfL's Healthy Street guidelines and under the Equality Act 2010. Proposed places to rest are proposed in buildouts at variable lengths starting from 5m accommodating individual armchair style seats (maximum two and angled), and a cycle stand, with provision every 50m in consideration of existing sitting opportunities including bus shelters and low

walls). The design is to be finalised in line with Southwark's streetscape design manual and with input from the Metropolitan Police 'Designing Out Crime' team to prevent antisocial behavior and crime. The buildouts are proposed to be constructed approximately three months after the zone is live following an early risk assessment in relation to parking stress.

- 43. In three streets residents expressed interest in community-led design of proposed alternative 'healthy street' parklet features and will be engaged further regarding proposed places to stop and rest.
- 44. Planting will be proposed in buildouts subject to an agreed maintenance regime and with input from the Metropolitan Police 'Designing Out Crime' team.
- 45. Requests were received for buildouts around mature trees at junctions but the design would be subject to more rigorous safety and engineering design assessments and therefore out of scope of this project.
- 46. Traffic management requests for removal of through-traffic are outside the scope of the parking zones but will be assessed for feasibility separately.
- 47. Disabled bays are subject to an audit using on-street revoke notices and the final construction design will exclude disabled bays not in use.
- 48. Representations can be made at statutory consultation in regards to the design. Amendments can be made where they do not result in further restrictions and are in line with safety and best practice considerations.
- 49. Any minor amendments may be made at implementation stage, as determined by officers.

Policy implications

50. The recommendations contained within this report are consistent with the missions of the Movement Plan 2019, particularly:

Action 7: Reduce the number of cars owned in the borough

Action 8: Use kerbside efficiently and promote less polluting vehicles

Action 9: Manage traffic to reduce the demand on our streets

Action 12: Movement to, within and from town centres is easy, safe and

accessible for all

Action 13: Make town centres attractive, thriving and diverse places for

people and businesses

Action 15: Reduce exposure to air pollution

Community impact statement

- 51. The implementation of any transport project creates a range of community impacts. All transport schemes aim to improve the safety and security of vulnerable groups and support economic development by improving the overall transport system and access to it. They also aim to reduce traffic and in turn, air pollution.
- 52. The provision of places to stop and rest is intended to enhance accessibility and enable active travel choices for people with mobility issues walking with or without sticks, people with disabilities including wheelchair users, the elderly,

- pregnant and breastfeeding women, as well as people walking with young children.
- 53. The introduction of additional yellow lines at junctions gives benefit to all road users through the improvement of inter-visibility and therefore road safety.
- 54. There is a risk that new restrictions may cause parking to be displaced and, indirectly, have an adverse impact upon road users and neighbouring properties at that location. Parking displacement is considered a risk particularly in streets closest to train stations, however this cannot be entirely pre-empted until the recommendations have been implemented and observed.
- 55. There is a risk that speeds increase where parking is removed from the road, particularly in roads reportedly used for through traffic. This cannot be preempted until the recommendations have been implemented and traffic surveyed.
- 56. With the exception of those benefits and risks identified above, the recommendations are not considered to have a disproportionate effect on any particular community group.
- 57. The recommendations support the council's health, equalities and human rights policies and promote social inclusion by:
 - Reducing traffic and improving air quality
 - Providing improved access for key services such as emergency and refuge vehicles.
 - Improving road safety, in particular for vulnerable road users, on the public highway.
 - Improving accessibility and removing barriers to active travel choices on the public highway.
- 58. The council believes the scheme (having regard to the desirability of securing and maintaining reasonable access to premises, the effect on the amenities of the locality affected and the importance of facilitating the passage of public service vehicles) contributes towards the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway.

Financial implications

- 59. The capital cost of works for the parking zone lining and signing is approximately £170,000 which includes design and project management costs. This expenditure will be funded by revenue.
- 60. The capital cost of works for 'healthy street' features is approximately £200,000 which includes design and project management costs. This expenditure will be funded by the Local Implementation Plan (LIP) Kerbside Smarter Street Programme £150,000) and revenue (£50,000). Commitments against this project will commence only when funding is approved.

Consultation

- 61. A parking consultation and community engagement has been carried out in advance of this report.
- 62. A draft of the consultation report was presented to Dulwich Community Council and Peckham and Nunhead Community Council and their comments can be found in the above paragraphs.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Law and Democracy

- 63. The cabinet member for environment, transport and the climate emergency is being asked to approve, subject to the outcome of statutory consultation in connection with the publication of and making of a traffic management order for the scheme to:
 - the implementation of a new parking zone (the "East Dulwich and Peckham West Zone") to operate Monday to Friday from 9.00am to 11.00am;
 - the position and type of parking bays and restrictions for the new parking zone and surrounding streets as shown in the detailed design; and
 - the inclusion, in line with the council's policy and legal obligations, of amenities
 to support active travel including places to stop and rest (single chairs in
 footway or new buildout in the carriageway), and cycle parking in the
 carriageway.
- 64. The need for further amendments to the design, which may become apparent during the implementation stage, may be delegated to officers. Furthermore, it is noted that there will be a parking zone review undertaken after approximately six to nine months of implementation and, subject to this, the need for further amendments to the design, may be delegated to officers.
- 65. The implementation of the new parking zone requires a traffic management order. The procedure for implementing a traffic management order involves a statutory consultation. Consideration of those objections and a decision on whether to proceed with that part of the scheme will be subject to a further report to the cabinet member for environment, transport and the climate emergency.
- 66. The report details the consultation which has taken place with residents and also with the relevant community councils. Part 3H of the Constitution sets out the requirement for consultation on any non strategic and highway improvement projects and that the community councils were given an opportunity to comment on the scheme in April and May 2019.
- 67. The Equality Act 2010 introduced the public sector equality duty, which merged existing race, sex and disability equality duties and extended them to include other protected characteristics; namely age, gender reassignment, pregnancy and maternity, religion and belief and sex and sexual orientation, including marriage and civil partnership. In summary those subject to the equality duty, which includes the council, must in the exercise of their functions: (i) have due

regard to the need to eliminate unlawful discrimination, harassment and victimisation; and (ii) foster good relations between people who share a protected characteristic and those who do not. Whilst the report takes these considerations into account and refers to the benefits of the scheme at paragraph 57, improving road safety on the public highway, in particular for vulnerable road users, it is emphasised that it is for the decision maker to be satisfied that the equality duty has been met.

- 68. The Human Rights Act 1998 imposed a duty on the council as a public authority to apply the European Convention on Human Rights; as a result the council must not act in a way which is incompatible with these rights. The most important rights for highway and planning purposes are Article 8 (respect for homes); Article 6 (natural justice) and Article 1 of the First Protocol (peaceful enjoyment of property). The implementation of a parking zone is not anticipated to breach the provisions of the Human Rights Act 1998.
- 69. The Health and Social Care Act 2012 imposed a duty on local authorities to take such steps as it considers appropriate for improving the health of the people in its area including providing services or facilities designed to promote healthy living (whether by helping individuals to address behaviour that is detrimental to health or in any other way).

Strategic Director of Finance and Governance

- 71. The report is requesting the cabinet member for environment, transport and the climate emergency to approve a number of parking control decisions as detailed in paragraph □.
- 72. Funding of the proposals is reflected in the financial implications section.
- 73. Staffing and any other costs connected with these recommendations to be contained within existing departmental revenue and capital budgets.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Movement Plan	Southwark Council	Southwark Transport
	Environment	Policy Team
	Highways	transport@southwark.
	Network Development	gov.uk
	160 Tooley Street	
	London	
	SE1 2QH	

APPENDICES

No.	Title
Appendix 1	Detailed design drawings
Appendix 2	East Dulwich parking consultation - Final report
Appendix 3	Peckham West parking consultation - Final report
Appendix 4	Elsie Road Risk Assessment

AUDIT TRAIL

Lead Officer	Dale Foden, Head of Highways (Acting)				
Report Author	Joanna Lesak, Proj	Joanna Lesak, Project Manager			
Version	Final				
Dated	July 2019	July 2019			
Key Decision?	Yes				
CONSULTATION	CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET				
MEMBER					
Office	Officer Title Comments Sought Comments Included				
Director of Law and Democracy		Yes	Yes		
Strategic Director of Finance		Yes	Yes		
and Governance					
Cabinet Member		Yes	No		
Date final report se	nt to Constitutional T	eam	15 July 2019		