

|                                    |                                |                                                       |                                   |
|------------------------------------|--------------------------------|-------------------------------------------------------|-----------------------------------|
| <b>Item No.</b>                    | <b>Classification:</b><br>Open | <b>Date:</b><br>November 25<br>2008                   | <b>Meeting Name:</b><br>Executive |
| <b>Report title:</b>               |                                | Canada Water Issues & Options Report                  |                                   |
| <b>Ward(s) or groups affected:</b> |                                | Rotherhithe, Surrey Docks                             |                                   |
| <b>From:</b>                       |                                | Strategic Director of Regeneration and Neighbourhoods |                                   |

## RECOMMENDATIONS

1. That the executive note the consultation plan (appendix B) and consultation strategy (appendix C).
2. That the executive note the interim Sustainability Appraisal (appendix D) and the Equalities Impact Assessment stage 1 report (appendix E).
3. That the executive approve for consultation the Canada Water Area Action Plan Issues and Options Report as set out in (appendix A).

## BACKGROUND INFORMATION

4. The council is preparing an area action plan (AAP) for Canada Water and the surrounding area. The AAP is being prepared under the new planning system and will comprise localised policies which help shape the regeneration of Canada Water. Like the core strategy it must be a spatial plan and concentrate on how change will be managed and achieved. Once adopted it will be a development plan in the council's local development framework (LDF) and will be used as the basis for determining planning applications in the area. Together with the core strategy and other local development framework documents, it will replace the Southwark Plan.
5. We are currently at the second stage of preparing the AAP. The first stage involved preparing and consulting on the sustainability appraisal scoping report. Consultation on the scoping report has been completed. An interim sustainability appraisal has been prepared which has incorporated comments on the scoping report where this was appropriate (appendix D). The comments received have also informed the current stage which is preparing an issues and options report.
6. At issues and options stage, the council must consult on strategic options for the regeneration of the area. These options must be fairly broad, but establish distinct and viable alternative approaches to regeneration. At this stage, the council does not state which of the options it prefers. The issues and options report is accompanied by an interim sustainability appraisal (appendix D) (the full appraisal is prepared at the preferred options stage), an equalities impact assessment (appendix E) and a consultation plan (appendix B).

## CONSULTATION

7. The Planning and Compulsory Purchase Act 2004 (amended 2008) and the council's Statement of Community Involvement (SCI) require consultation at issues and options stage to be ongoing and informal. To guide the overall

approach to consultation on the AAP, the council has prepared an overarching consultation strategy for the document (appendix C). At each stage in preparing the AAP, the council will also prepare a detailed consultation plan (appendix B) for your comment.

8. The council will consult on the Issues and Options Report over a period of at least 12 weeks, in line with the SCI. All documents will be available on the internet, in council offices, libraries and area housing offices. Adverts will also be placed in the press.
9. It is important to recognise that a considerable amount of consultation has taken place over the last few years. The council aims to build on this process and demonstrate that previous comments have been taken into account to try and avoid consultation fatigue.
10. In spring 2008, the council consulted on the scoping report for the sustainability appraisal of the AAP. 45 representations were received. These were predominantly from statutory organisations (the Environment Agency, English Heritage, Natural England and GOL) and also from the Hawkstone TRA. The GLA confirmed it did not want to comment at this stage. The main issues raised were:
  - Flood risk should be taken into account at all stages in the SA process (EA)
  - The council's Design and Conservation team should be involved at all stages (EH) and further indicators relating to the historic environment could be added
  - The sustainable development objectives were supported (NE)
  - Further reference should be made to EU legislation and care should be taken to ensure that the SA has a balance of social, economic and environmental factors (GOL)
  - Some of the data relating to housing was inaccurate and should be updated; many of the homes in the area are in poor condition and do not meet decent homes standards; the shopping centre/masterplan area is not an island and should not be looked at in isolation from surrounding areas which include the Hawkstone Estate (Hawkstone TRA)
11. The council's response to all these representations is set out in the interim sustainability appraisal (appendix D of this report).
12. In addition to consultation on the scoping report, over the past few months, the council has been publicising the documents and the issues they raise through events such as The Event in Southwark Park and the Rotherhithe Festival.
13. Consultation will include events being held in schools, fun days (such as the Hawkstone Estate fun day) and exhibitions.
14. Planning committee have provided their comments at the meeting on October 15 2008. These are provided in appendix F.

## **KEY ISSUES FOR CONSIDERATION**

15. Canada Water Area Action Plan Issues and Options Report is attached as appendix A. The Canada Water AAP issues and options are grouped under 7 key themes which are town centre/neighbourhood hubs, leisure, places, homes,

transport, social and economic opportunities and finally the delivery of the AAP. The focus of the AAP is a core area around the shopping centre, although it will also be important to ensure that impacts in the wider peninsula are addressed.

16. The options have been grouped under two headings to ensure that they are consistent. These are: Option A Regeneration with a focus on homes (bringing improvements in the town centre) and Option B Regeneration with a focus on homes, shops, leisure and jobs (bringing improvements in the town centre and wider peninsula). Improvements common to both options are also set out.
17. Town centre: Canada Water has around 40,000 sq m of shopping floorspace and is a district town centre in the London Plan. In the residential-led regeneration option, the role of the centre would not change and it would continue to have an out-of-centre feel. There would be a small increase in shopping floorspace, potentially by up to around 10,000 sq m, but the shopping centre would remain in place. By contrast, in the mixed regeneration options, the shopping centre would be redeveloped and replaced by mixed use developments that would feel much more like a town centre. The amount of shopping space would be increased significantly. This would mean that a much greater range of shops could be provided, including a new department store.
18. Leisure: The peninsula has the potential to become a great leisure destination. In the residential led regeneration option, the Seven Islands leisure centre could be refurbished. The council will do its best to keep the Seven Islands Leisure Centre operating. However, at some time the centre will require substantial investment which the council cannot presently afford and without which it may not be possible to keep the centre open. In the mixed regeneration option, leisure facilities including a new swimming pool could be provided. It will be necessary to sell the Seven Islands leisure centre to achieve this.
19. Places: The town centre is currently characterised by bland and lifeless architecture. A key objective of the AAP is to create a centre which is more distinctive with the Canada Water basin as its focus. In the residential-led regeneration option, building heights would generally be up to around 6 storeys in the car parks and 10 storeys on sites A and B. These scale up in the mixed regeneration options. The medium option includes a building of around 22 storeys on site A, while the high option also contains tall buildings on the shopping centre site (opposite Surrey Quays tube station), on Surrey Quays Road and on the Hawkstone estate to replace the 16 storey John Kennedy House. The tall buildings would act as landmarks in the area and help mark the town centre and key locations such as the new plaza and the tube stations. They can variety to the character of an area and help make the skyline more interesting. It is very important that they are of the highest architectural quality and that they are designed carefully to avoid overshadowing or wind tunnel effects.
20. A new plaza will be provided outside the library. Within mixed regeneration options, public realm improvements would be more extensive and include enhancements to Lower Road, St Mary's conservation area and Albion Street.
21. Better homes: The options for homes are closely based on the options being explored through the core strategy. With regard to site specific options, in the residential-led regeneration option, new homes could be built on most development sites in the core area. No council owned estates would be redeveloped on the peninsula. The low-rise homes and John Kennedy House

on the Hawkstone estate require substantial investment to meet Southwark's Decent Homes Standard and bring the properties up to reasonable state of repair. There are pressures on the council's housing investment programme as it is not big enough to meet the scale of demand across the borough, this will impact on the works to the Hawkstone Estate. By contrast within the mixed regeneration options, there will be more new housing of all tenures than in option A. There could be more regeneration of estates on the peninsula in this option depending on feedback from the consultation on the issues and options paper and the council's capacity to undertake the rebuilding of estates. Around 25% of new homes would be family sized homes with three or more bedrooms. New homes would be provided on the Hawkstone Estate through redevelopment of the low rise housing and John Kennedy House. There would be more intermediate housing, such as low cost home ownership to help lower and middle income families get onto the housing ladder. We would also seek more larger homes, to help make the area more attractive to families.

22. Improved transport links: Lower Road is very congested at peak times when there is a conflict between local and through traffic. The traffic gyratory around Lower Road, Bush Road, Rotherhithe Old Road and Rotherhithe New Road creates a poor environment for residents who live around it and the town centre area is poorly connected to the wider peninsula. In the residential-led regeneration scenario, the council would improve key pedestrian and cycle links in the town centre area and make incremental improvements to the road network. A higher quantum of development in the core area would enable the council to explore the feasibility of simplifying the gyratory, possibly reintroducing two way traffic on Lower Road and improving pedestrian and cycle links to the wider peninsula.
23. Enhanced social and economic opportunities: A new secondary school will be built in the area. Possible sites include St Paul's playing field, the Quebec Industrial Estate and Rotherhithe Primary School. St Paul's Fields is large enough to provide a new secondary school and Southwark owns the site. For these reasons it has not been discarded as an option. However, it is some distance from the core Canada Water area, so would have very minimal investment benefit for the town centre. Although improvements are currently being carried out to Mellish Fields, the council would need to demonstrate to the Government and Mayor that the St Paul's site is surplus to open space requirements. The Southwark Plan identifies the Quebec Industrial Estate as a potential education site. This site is large enough to provide all the necessary facilities. The school would have easy access to Russia Dock Woodland and the water sports facilities in Greenland Dock. However, Southwark does not own the site and would have to purchase the land, which would impact on the funding available to build the school. The Rotherhithe site option could streamline resources for both Rotherhithe Primary School and new secondary school and provide students with access to a greater range of facilities than they could access in a single school. Both schools would work in a complementary way with the sports facilities in Southwark Park.
24. We would consider the redevelopment of Albion Primary School. There is the possibility of a retail/residential frontage on Albion Street and a better layout for school buildings and facilities on the rest of the site. Redevelopment of Albion Primary School would allow the school to provide a better education experience for its pupils in up-to-date facilities. It would also make best use of the space around the school, providing easy access to a range of co-located community and retail services and help make Albion Street more lively, and improve

access to the river from the centre of the 'new town'. Rotherhithe library would be redeveloped to provide a mix of uses, including residential and office use or community and retail. This could possibly include a new council and partner office base to co-locate organizations services with a local remit.

25. In addition to education, the issues and options report contains options around businesses and employment, as well as community facilities which will be needed to support new residential development in the area.
26. Delivery: The final part of the report describes how the plan can be delivered. It is important to recognise that the options have not yet been fully tested and costed. This will take place at the next stage of the process. Detailed planning permission has been granted for the library and on site B1. The council will continue to work with its development partner British Land Canada Quays to bring forward development on land owned by the council and facilitate development on other sites in the core area. Delivery is a key part of the overall plan and when the AAP is examined, the council will need to be able to demonstrate to the inspector, that it is realistic, viable and can be implemented.

### **Community Impact Statement**

27. The purpose of the AAP is to facilitate regeneration and deliver the vision of Southwark 2016 in a sustainable manner ensuring that community impacts are taken into account.
28. In preparing the issues and options reports, the council has also completed Equalities Impact Assessment (EqIA) scoping reports (available on the website). These highlight a number of key issues that need to be addressed in preparing the AAP. The first of these is the need to ensure that the methods used to consult and engage people in the preparation of the AAP are open and accessible to all members of the community. To help address this issue the council has prepared a consultation strategy which sets out the principles of how it will consult and the importance of reducing barriers to consultation. These emphasise that particular needs such as access, transport, childcare and translation need to be considered, as well as a strategy to broaden the appeal of consultation and make it attractive to a diverse range of people and groups. At each stage, participation will be monitored and analysed to see whether any particular groups have not been engaged and whether this can be addressed at the next stage.
29. Other issues which the EqIA highlights, include access to housing for all groups. There are particular groups, such as BME communities, who are impacted by the size of housing and have a need for family sized units. It will also be important to ensure that homes are adaptable and meet lifetime homes needs, and that homes which can be easily adapted to wheelchair use are provided. The latter are important considerations for the elderly and people with disabilities. The council has a statutory duty to provide for Gypsies and travelers, and this needs to be taken into account in allocating sites in the plan. It will also be important that the plans help reduce barriers to work which are experienced by those with low skills, single parent families, and people with disabilities in particular. This will have implications for a number of the council's equalities target groups, including the young and older people, people with disabilities and people in BME communities whose first language is not English.

30. Other important issues include access to facilities, to shops, jobs, schools etc. It will be important to ensure that provision is located in areas which are accessible. This can be particularly important for groups who are less likely to have access to cars, including the young and elderly. While it will be important to improve access to public transport and reduce parking requirements, it should be borne in mind that some groups rely on cars, particularly families and the elderly.
31. An interim sustainability appraisal has been prepared to ensure the wider impacts of development are addressed. Both the sustainability appraisal and the EqIA will be taken forward and revised at preferred options stage.

## **SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

### **Strategic Director of Legal and Democratic Services**

32. The purpose of this report is to consider the options in respect of a number of issues relating to the Canada Water Area Action Plan (CWAAP). The issues and options paper (July 2008) is one of the early stages involved in preparing the CWAAP.
33. The CWAAP is a development plan document (Regulation 7 of the Town and Country Planning (Local Development) (England) Regulations 2004 ("the Regulations")) and will be subject to independent examination.
34. The CWAAP focuses on implementation of planning policy, by providing an important mechanism for insuring development of an appropriate scale, mix and quality for the Canada Water area. The document before committee forms part of the production stage in the development plan document process which will be followed by the preparation of preferred options in consultation with the community, formal participation on these and preparation and submission of the CWAAP in light of the representations received on the preferred options.
35. In preparing the CWAAP the council must have regard to:
  - a) National Policies and Guidance.
  - b) The London Plan.
  - c) The Community Strategy.
  - d) Any other DPDs adopted by the council.
  - e) The resources likely to be available in implementing the proposals in the CWAAP.

### **General Conformity**

36. Section 24(1)(b) of the Act requires that local development documents (LDDs) issued by the Council, such as this AAP, must be in general conformity with the spatial development strategy, namely the London Plan (consolidated with alterations since 2004). On submission of the final draft of the AAP to the Secretary of State for independent examination, the Council will be required to simultaneously seek the Mayor's opinion in writing as to whether the AAP is in general conformity (Reg 30, the Regulations). The purpose of the independent examination is to ensure legal compliance with the legislative framework, including consultation and soundness of the AAP (Section 20(5)(b) of the Act). General conformity must be determined as a matter of law and policy practice.

37. General conformity is not a defined term anywhere within the legislative framework. However, the Court of Appeal decision of *Persimmon Homes (Thames Valley) Ltd & Oths v Stevenage Borough Council* [2005] EWCA 1365 considered the judicial construction of the term and contains authoritative guidance. The term is to be given its ordinary meaning and take into account the practicalities of planning control and policy, namely the long lead times for the implementation of planning policy and the exigencies of good planning policy which are liable to change. The 'general conformity' requirement must accommodate these factors and on its true construction allow a 'balanced approach' favouring 'considerable room for manoeuvre within the local plan' (the Southwark Plan 2004 and in future the Local Development Framework) in the measures taken to implement the structure plan (the London Plan) so as to meet the changing contingencies that arise.
38. In other words the word 'general' is designed to allow a degree of flexibility in meeting London Plan objectives within the local development plan. The fact that the statutory regime makes provision for the possibility of conflict between the London Plan and local plan to be resolved in favour of the latter subject to general conformity envisages that 'general conformity' requirement allows for flexibility at local level and not strict compliance with every aspect of the London Plan (Section 46(10) of the 1990 Act as substituted by the Act). This is provided that the effectiveness of the London Plan strategic objectives are not compromised and there is local justification for any departure.

### **Sustainability Appraisal and Strategic Environmental Assessment**

39. The European Directive 2002/42/EC requires an 'environmental assessment' of plans and programmes prepared by public authorities' that are likely to have a significant effect upon the environment. This is referred to as 'Strategic Environmental Assessment' (SEA). Further, the Planning and Compulsory Purchase Act 2004 requires a Sustainability Appraisal (SA) to be prepared for all emerging development plan documents and therefore this applies to the CWAAP. The SA and SEA are similar processes that involve a comparable series of steps. If there is difference between them, it lies in the fact that the SEA focuses on environmental effects whereas SA is concerned with the full range of environmental, social and economic matters. Regulation 25 of the Regulations requires the council to consult with the community and stakeholders during the preparation of the preferred options and to publish an initial Sustainability Report.

### **Equalities Impact Assessments (EqIAs)**

40. The Race Relations (Amendment) Act 2000 places a duty on local authorities to promote race equality in their policy-making, service delivery, regulation, enforcement and employment. This includes three overlapping areas of responsibility:
1. To eliminate unlawful discrimination (direct or indirect)
  2. To promote equality of opportunity
  3. To promote good community relations
41. During the policy and decision making process, The Disability Discrimination Act 2006 places a similar positive duty on local authorities to have regard to the promotion of equality for disabled groups and individuals. This is in addition to the duty to eliminate or prevent unlawful discrimination (whether direct or

indirect). The issues and options paper complies with the requirements of both the Race Relations Act and Disability Discrimination Act.

42. To meet these responsibilities, Southwark has published its Equality Scheme 2005-2008 approved by the executive in October 2005. This sets out our overall policy for addressing equality, diversity and social cohesion in the borough. This policy recognises that people may face discrimination, or experience adverse impact on their lives as a result of age, disability, ethnicity, faith, gender or sexuality.
43. The carrying out of an EqIA in relation to policy documents such as this AAP improves the work of Southwark by making sure it does not discriminate and that, where possible, it promotes equality. The EqIA ensures and records that individuals and teams have thought carefully about the likely impact of their work on the residents of Southwark and take action to improve the policies, practices or services being delivered. The EqIA in respect of this AAP considered the impact of the proposed policy on groups who may be at risk of discriminatory treatment and has regard to the need to promote equality among the borough's communities.

### **Human Rights Implications**

44. The Human Rights Act 1998 imposes a duty on the council as a public authority to apply the European Convention on Human Rights and the council must not act in a way which is incompatible with these rights. The most important rights for planning purposes are Article 8 (the right to respect for home and private life) and Article 1 of the First Protocol (the right to peaceful enjoyment of property). Article 6 (right to a fair trial) is also engaged in relation to the principles of natural justice, for instance the right to consultation during the policy making process. In general, these principles are inherent in domestic law. At this stage the CWAAP has been prepared in accordance with the statutory process, it is therefore likely to be in conformity with the Human Rights Act 1998. Throughout the decision making process for this AAP consideration will need to be given to any human rights implications.
45. It is important to note that not all rights operate in the same way. Few rights are absolute and cannot be interfered with under any circumstances. Other 'qualified' rights, including the aforementioned Article 6, Article 8 and Protocol 1 rights, can be interfered with or limited in certain circumstances. The extent of legitimate interference is subject to the principle of proportionality whereby a balance must be struck between the legitimate aims to be achieved by a local planning authority in the policy making process against potential interference with individual human rights. Public bodies have a wide margin of appreciation in striking a fair balance between competing rights in making these decisions. This approach has been endorsed by *Lough v First Secretary of State* [2004] 1 WLR 2557 and clearly shows that human rights considerations are also material considerations in the planning arena which must be given proper consideration and weight. It is acceptable for the council to strike a balance between the legitimate aim of regeneration for the benefit of the community as a whole against potential interference with some individual rights.
46. Therefore providing that the council, its members and officers understand human rights considerations and throughout the decision making process take these into account, and strive to strike a balance between competing rights no unlawful interference should be caused.



## **Implementation and Monitoring of the AAP**

47. Although, this is an early stage in the production process of the CWAAP the following issues will need to be addressed by the preferred options stage: -
- The mechanisms for monitoring the CWAAP will need to be developed and consideration given to the way in which changes in circumstances or policy will or can be addressed.
  - The mechanisms for implementation will need to be developed significantly. The mixed regeneration Option B in particular is reliant on very significant investment. Before the preferred options stage there needs to be real clarity about the likelihood of the required investment being delivered particularly in the current economic climate.
  - Given the potential, in the high investment option, for significant infrastructure to be provided the spatial implications of that infrastructure will need to be considered further.
  - As part of the process of implementation there is likely to be a need for compulsory purchase of land and the preferred options will have to be explicit about that. When the CWAAP is submitted to the Secretary of State it will trigger the potential for statutory blight claims to be made. By the preferred options stage the council will need to be confident that it can address any properly made claims
48. The approval of a development framework document for consultation is delegated to the individual executive members (IDM) for their area of responsibility. However, the IDM has the option of taking the decision him or herself or refer it the executive for decision. The executive member for regeneration has exercised this option to refer the matter to the full executive for a decision and the executive is asked to agree approve the issues and options for the Canada Water AAP for consultation in place of the executive member for regeneration.

## **Strategic Director of Finance**

49. This report is for the executive to agree a consultation on the CW AAP Issues and Options report. The AAP consultation proposes two main options being 'low resource regeneration' and 'high resource regeneration'. The consultation costs are met from existing budgets within Major Projects.
50. The AAP consultation result will have financial implications which it is not possible to quantify at this stage. The options under consultation will require significant investment by the council both through Capital Funding and the revenue cost of officers pursuing preferred options and procuring development solutions. No budgets have been identified for this investment. Regeneration colleagues will need to work closely with finance colleagues to ensure all investment requirements are identified and quantified before commitments are entered into, all funding avenues have been explored and that the chosen solutions offer value for money

## **REASONS FOR URGENCY**

51. Due to a statutory requirement to deliver the Canada Water Area Action Plan in line with the local development scheme, approval of the consultation document

must be completed by November 2008 and so is not able to be delayed beyond this executive.

## REASONS FOR LATENESS

52. The report was deferred from the October executive in order to resolve some issues that were raised. Essential decisions on some of these issues have led to the report being late.

## BACKGROUND DOCUMENTS

| Background Papers                                                                                                   | Held At                                                                | Contact                        |
|---------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|--------------------------------|
| Appendix B<br>Canada Water Area Action Plan<br>Issues and Options Report<br>Consultation Plan                       | <a href="http://www.southwark.gov.uk/ldf">www.southwark.gov.uk/ldf</a> | Sandra Warren<br>020 7525 5471 |
| Appendix C<br>Canada Water Area Action Plan<br>Issues and Options Report<br>Consultation Strategy                   | <a href="http://www.southwark.gov.uk/ldf">www.southwark.gov.uk/ldf</a> | Sandra Warren<br>020 7525 5471 |
| Appendix D<br>Canada Water Area Action Plan<br>Issues and Options Report<br>Interim Sustainability Appraisal        | <a href="http://www.southwark.gov.uk/ldf">www.southwark.gov.uk/ldf</a> | Sandra Warren<br>020 7525 5471 |
| Appendix E<br>Canada Water Area Action Plan<br>Issues and Options Report<br>Stage 1 Equalities Impact<br>Assessment | <a href="http://www.southwark.gov.uk/ldf">www.southwark.gov.uk/ldf</a> | Sandra Warren<br>020 7525 5471 |
| London Plan                                                                                                         | Planning Policy Team<br>Chiltern House                                 | Sandra Warren<br>020 7525 5471 |
| Southwark Statement of<br>Community Involvement                                                                     | Planning Policy Team<br>Chiltern House                                 | Sandra Warren<br>020 7525 5471 |
| Southwark Local Development<br>Scheme                                                                               | Planning Policy Team<br>Chiltern House                                 | Sandra Warren<br>020 7525 5471 |
| Southwark Plan 2007                                                                                                 | Planning Policy Team<br>Chiltern House                                 | Sandra Warren<br>020 7525 5471 |

## APPENDICES

There are many appendices that are available on request or on the internet at [www.Southwark.gov.uk/ldf](http://www.Southwark.gov.uk/ldf)

| No.                                       | Title                                                      |
|-------------------------------------------|------------------------------------------------------------|
| Appendix A<br>Paper copy with this report | Canada Water Area Action Plan Issues and Options<br>Report |

## AUDIT TRAIL

|                                                                           |                                                                      |                          |
|---------------------------------------------------------------------------|----------------------------------------------------------------------|--------------------------|
| <b>Lead Officer</b>                                                       | Richard Rawes, Strategic Director of Regeneration And Neighbourhoods |                          |
| <b>Report Author</b>                                                      | Julie Seymour, Head of Planning Policy                               |                          |
| <b>Version</b>                                                            | Final                                                                |                          |
| <b>Dated</b>                                                              | November 19 2008                                                     |                          |
| <b>Key Decision?</b>                                                      | Yes                                                                  |                          |
| <b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / EXECUTIVE MEMBER</b> |                                                                      |                          |
| <b>Officer Title</b>                                                      | <b>Comments Sought</b>                                               | <b>Comments included</b> |
| Strategic Director of Legal and Democratic services                       | Yes                                                                  | Yes                      |
| Director of Finance                                                       | Yes                                                                  | Yes                      |
| Executive Member                                                          | Yes                                                                  | No                       |
| <b>Date final report sent to Constitutional Support Services</b>          |                                                                      |                          |