

Item No. 11.	Classification: Open	Date: 17 December 2019	Meeting Name: Cabinet
Report title:		Leathermarket Grant Agreement	
Ward(s) or groups affected:		London Bridge & West Bermondsey, and Chaucer	
Cabinet Member:		Councilor Leo Pollak, Social Regeneration, Great Estates and New Council Homes	

FOREWORD - COUNCILLOR LEO POLLAK, CABINET MEMBER FOR SOCIAL REGENERATION, GREAT ESTATES AND NEW COUNCIL HOMES

Southwark council's generational target towards building 11,000 council homes requires not only necessitates an expansion of our development and construction management capacity, but also entering developing new building, land, resource and community partnerships with organisations who share our values, our commitment to design excellence, and to building strong engaged communities. With over 11,000 households on our housing waiting list, the urgency of bringing forward high quality genuinely affordable in any and every way has never been greater.

To this end the council's partnership with the Leathermarket CBS has proven to be the strongest community house-building partnership in the city, with the award-winning council housing scheme of 27 council homes on the Kipling estate completed last year, and another upcoming project of 40 new council homes extending the Lawson estate on Deverill St now on site and due to complete by Spring of 2021.

We are now looking to extend this partnership onto 10 further sites, delivering over 200 additional council homes across Bermondsey and Borough over the whole programme. These include infill sites developed as part of a wider resident-centred estate improvement plan, as well as potential rooftop sites brought forward in line with the council's Rooftop development principles.

This report confirms the overarching grant agreement, the processing of GLA grant funding towards delivery of new council homes, as well as an agreement to share nomination rights between the council and Leathermarket JMB. It also confirms a ring-fencing arrangement to ensure that at least £14m of any net rental income across this initial pipeline is recycled back into the council's new homes programme. This will deliver council homes, owned by the council, managed by Leathermarket JMB, let to local people on secure lifetime tenancies on social rents.

I would like to thank the officers at the council and at Leathermarket for their work in making this partnership such a success. I look forward to continuing the mutual learning in council homes development between the council and CBS, and to seeing many more exemplary council homes projects coming forward in Bermondsey over the coming years.

RECOMMENDATIONS

1. Approves the overarching grant agreement with Leathermarket CBS to deliver 161 council homes.

2. Approves the project grant agreement for the delivery of individual projects outlined in the overarching grant agreement.
3. Delegates the approval of the grant following this report to the strategic director of housing and modernisation in consultation with the strategic director of finance and governance.
4. Notes that the council will own these properties and residents will be signed up on council tenancy agreements.
5. Notes that Leathermarket JMB will be ring-fencing the net rental income from the additional homes provided at Marklake Court and further schemes proposed for the first 10 years, which will bring additional benefits to the council and wider community, estimated at nearly £14m.
6. Notes a separate agreement will be drawn up to agree the ring-fencing of this income, its use and including claw back mechanism by the council.
7. Notes approximately £2m of this will be used to reduce the costs to the development programme.
8. The remaining £12m will be used to deliver an estimated additional 30-35 council homes. With the income accumulated from the new homes being used to start 10 of these homes by 2026/7.
9. Notes the grant of £12,897,245 construction costs plus £2,904,245 professional fees and contingency will be given under the delegated approval to complete the work started on the Joseph Lancaster estate to deliver 40 council homes.
10. Notes the council will receive £4,000,000 of Council Homes for Londoners Grant for the successful delivery of these homes at Joseph Lancaster.
11. Notes an additional grant will be required to remediate the ground condition of the Joseph Lancaster site, following recent asbestos discovery. To date, no archaeological finds have been discovered that may adversely influence programme and/or costs.

BACKGROUND INFORMATION

Leathermarket

12. In 1996 Southwark Council outsourced the management of around 1500 homes in North Bermondsey to the Leathermarket Joint Management Board (JMB). This decision proved successful as the Leathermarket JMB has had three successful continuation ballots with the latest seeing a 76% turnout and a 93% approval of secure tenants. Subsequently the council agreed to make the JMB the country's first self financing Tenant Management Organisation.
13. Leathermarket Community Benefit Society (CBS) was subsequently set up by the JMB, as a separate Company to delivery affordable homes. The CBS was established in response to local residents raising concerns about the lack of affordable homes in the Leathermarket area.

14. The JMB is seeking to support Southwark to deliver 11,000 new genuinely affordable homes, 2500 of these by 2022.

Development Opportunities

15. The JMB is working with local residents, to design homes that meet local needs, in a way that is sympathetic to the immediate neighbours and allocating a proportion of these to residents on the estate. This approach at Marklake Court has been proven to have achieved a much greater level of local support than an outside developer could achieve. This approach will enable the JMB to unlock contentious sites and hidden homes.
16. Through a process of analysis of the JMB estate, in conjunction with local residents and professional advisors, a number of potential development sites have been identified and documented in the CBS/JMB Estate Improvement Plan. This includes the Joseph Lancaster estate and several other sites outlined in this paper to deliver an estimated 161 new council homes as part of a new grant agreement estimated at a cost of around £50m. The council affords Leathermarket to develop proposals to deliver new council homes as part of its commitment to provide 11,000 new council homes.
17. In October 2018 the council was notified that the bid for Council Homes for Londoners Grant was successful and £9.3m of funding for the successful delivery of Joseph Lancaster and the Elim sites in the proposed Leathermarket Programme.
18. A grant agreement is being proposed to give a clear arrangement for the delivery of the Leathermarket programme of new homes. This is structured as an:
 - Overarching grant agreement: This agreement sets out the overarching principles upon which funding may be made available to the grant recipient and the grant recipient's role in securing the delivery of the outputs
 - Project grant agreements: Project grant agreements will set out the detailed terms and conditions upon which specific amounts of funding will be advanced to the grant recipient by the Authority.
19. The agreements set out the conditions upon which funding is provided from the council to the grant recipient. The agreement specifies the purpose for which grant is to be provided, the reporting arrangements, monitoring and evaluation, liaison and communication between the parties, and the funding provided to the grant recipient.

Delivery of Joseph Lancaster nursery site

20. The first scheme delivered under these agreements will be the Joseph Lancaster nursery site.
21. In March 2018 cabinet noted that officers carried out a due diligence exercise on the Leathermarket Community Benefit Society in connection with the application for funding of a development of 40 new council funded homes at council rents on the former Joseph Lancaster Nursery Site and authorised the director of housing and modernisation to enter into negotiation on an Agreement for the Lease or a loan and grant of a long leasehold interest of the Land on the Joseph Lancaster

Estate, with the Leathermarket Community Benefits Society (CBS) on the same basis as agreed for the first development site: undertaken by the CBS at Kipling Garages and that any variations be delegated to the Strategic Director of Housing & Modernisation.

22. In April 2019 cabinet noted that Joseph Lancaster would now be built as council homes let on council tenancies and accounted for in the Housing Revenue Account.
23. Bell Phillips Architects were commissioned in May 2017 to produce an indicative design in collaboration with local residents. The development proposal for the site is based on the construction of 40 homes, consisting of a new staggered multi-storey building consisting of 34 flats, with the highest part being eight storeys; and six three-bed two-storey mews houses. The proposed buildings form an L-shape, with a proposed communal open space in the centre, incorporating landscaping, a re-provision of car parking and children's play space.
24. The tenure mix is based on providing 40 social rented homes, comprising of six three-bed terraced houses, seven one-bed flats, twenty four two-bed flats, three three-bed flats.
25. Planning permission (17/AP/4661) was granted in 10 Jan 2019.
26. A maximum of interim grant funding of £1,583,102 has been provided by the council to progress the works pre construction works including full enabling and archeological investigations at the Joseph Lancaster site prior to having the full grant agreement in place for the main contract to start in February 2020, following delays due to the discovery of asbestos.
27. Pre-construction ground works on site have been halted due to the identification of asbestos. An archeological survey within trial pits, as well as a survey to identify any unexploded ordnance is currently being undertaken. The results will inform the final remediation strategy.
28. The total sum payable under the Joseph Lancaster Project Grant Agreement will be £15,801,474 (plus any remedial works identified). This will be funded from a combination of £4,000,000 of Council Homes for Londoners Grant and other resources supporting the Housing Investment Programme.
29. The council has ensured costs have been independently appraised through two independent external reviews from an external cost consultant, one of which had been directly appointed by LBS. Whilst considering the viability of this scheme the council recognise that the price per unit, although not the most costly in the initial 2500 target programme, do sit within the upper quartile of the spectrum. This is predominantly due to the ground conditions identified despite which the homes do still represent value for money.
30. Contract Sum Analysis (CSA) provided by Buxton Building Contractors Ltd (BBCL) has been benchmarked. Building Cost Information Service (BCIS) figures include preliminaries, overheads and profit but exclude design fees, contingencies, external works and external services. Therefore in order to make direct comparison with the BCIS rates, the CSA cost has to be adjusted to exclude external works, design fees, abnormal costs and associated overheads

and profit which provides an adjusted rate of £2,199.63/m². The BCIS apportioned median is £2,188.91/m² with the upper quartile at £2,511.75/m². The CSA compares favourably with BCIS average prices and falls between the median and upper quartiles.

KEY ISSUES FOR CONSIDERATION

31. The homes provided through this proposed development programme will contribute to the council's commitment to deliver 11,000 new homes by 2043 and to deliver 2,500 of those new homes by 2022.
32. In July 2016 Leathermarket CBS submitted a detailed business plan to the council which outlined the commitment to comply with the council's local lettings policy of 50% local lettings on all new council funded homes but was allowed up to for 100% local lettings on Marklake due this particular scheme given the level of resident involvement in design. All allocations will be council allocations, some will be local lettings in accordance with the allocations schemes. It is currently planned that 50% should be local lettings over the whole programme as outlined below.

Scheme	Total Council Homes	Local Allocations	Boroughwide Allocations	Local Percentage
Villiers Court, 167 Long Lane	21	1	20	5%
Marklake Court, Weston Street	27	26	1	96%
Joseph Lancaster Nursery, Deverell Street	40	17	23	43%
Elim Estate Ball Court	24	11	13	46%
Elim Garages	10	5	5	50%
Elim Triangle Site	12	5	9	42%
Cluny Estate	8	4	4	50%
Decima Street	2	2	0	100%
Lawson Estate	7	7	0	100%
Falmouth Road	14	7	7	50%
Whites Grounds Estate	4	2	2	50%
JMB Office site	40	18	22	44%
TOTALS	209	105	106	50%

33. Officers have also run the Joseph Lancaster development proposal through the council's appraisal model, which is used to appraise our own internal direct delivery programme of new council homes. The appraisal analysis reports that the cost to value ratio is positive as would be expected given the property values in this part of the borough. The appraisal analysis also identifies that construction costs are high but consistent with those on recent council schemes.
34. Officers will be working with officers of the Leathermarket CBS to ensure it delivers the programme as efficiently and effectively as possible. As well as regular contact, a quarterly review meeting is already in place.

Additional revenue use

35. The net rental income, after management and maintenance costs, from the additional scheme at Marklake Court and further schemes delivered through this programme will, for the first 10 years, will be used to bring additional benefits to the council and wider community. This amount is estimated at nearly £14m.
36. A separate agreement will be drawn up to agree the ring-fencing of this income, its use and include a claw back by the council if the terms are not met.
37. Approximately £2m of this will be used to directly reduce costs to the programme.
38. The remaining £12m will be used to deliver an estimated additional 30-35 council homes. With the income accumulated from the net rent from the new homes being used to start 10 of these homes by 2026/7.

The overarching agreement

39. The overarching agreement sets out that:
 - The council (in exercise of its powers) has agreed in principle to make available the project funding in an aggregate principal amount equal to the maximum amount agreed in the project agreement.
 - To make this project funding available to the grant recipient subject to and in accordance with the terms of the agreement.
40. The delivery programme will deliver a proposed 161 council homes, as well as office re-provision and community space. The programme output schedule is summarised in the below table:

Project Site	No. of Council Homes	Other	Start	Finish
Leathermarket - Joseph Lancaster	40		June 2019	February 2022
Leathermarket - Elim Estate sites (Ballcourt, Garages and Triangle site)	46	Office Provision Community Space	April 2021	March 2023
Leathermarket - Cluny estate (Garages and infill)	8		October 2021	March 2023
Leathermarket – Decima Street	2		October 2021	March 2023
Leathermarket - Lawson estate	7		December 2021	October 2023
Leathermarket - Whites Grounds estate	4		October 2021	March 2023
Leathermarket - Falmouth Road	14		December 2021	October 2023
Leathermarket - JMB Office site	40		June 2023	December 2024

41. The office provision and community space, to be delivered as part of the Elim Estates scheme are to allow for the later re-development of the JMB office site to provide an estimated 40 council homes; and due to the loss of community facilities (Ball Court) as part of a planned development.
42. In the event of failure of Leathermarket CBS to deliver or procure the delivery of any output (in whole or in part) in accordance with the timescales, the council, can amongst other terms outlined be entitled to terminate this agreement in its entirety or cancel any uncommitted payment due under the relevant Project Grant Agreement.
43. The overarching agreement takes into account key obligations around confidentiality and freedom of information and data protection as well as provision for dispute resolution.
44. The director of housing and modernisation (Senior Authority Officer) has full delegated authority to act on behalf of the Council for all purposes of the agreement.

Project Grant Agreement

45. The project Grant Agreements set out the detailed terms and conditions upon which specific amounts of Funding will be advanced to the Grant Recipient by the Authority.
46. The Grant Recipient may submit a claim for an instalment of the Grant to fund or part-fund a delivery stage upon meeting the relevant milestone, which the council must approve. These will be sent to the Delivery Programme Board and formal approval will subsequently be from the director of housing and modernisation, who will consult with the the strategic director of finance and governance.

Delivery Stage	Relevant Milestone
Feasibility Stage	Inception Report Milestone
Planning Application Stage	Feasibility Report Milestone
Detailed Design & Contract Procurement	Planning Milestone
Construction Stage	Building Contract Milestone
Final Payment Stage	Retention Milestone

47. The agreement restricts the use of grant to fund the Project in accordance with the Schedule of Costs and for no other purpose.
48. The agreement also sets out the monitoring and reporting requirements for the grant recipient including quarterly financial reports, a risk register and health and safety reports.
49. The authority has discretion to withhold or suspend payment of any grant instalment in a number of circumstances including that the grant period has expired or the authority considers that unsatisfactory progress with the Project has been made.

50. The agreement sets out observance of statutory requirements to the grant recipients including the Equality Act 2010, the Health and Safety at Work Act 1974 and the Modern Slavery Act 2015. It also requires the recipient so make sure that all Relevant Staff employed or engaged by it are paid an Equivalent Hourly Wage which is equal to or exceeds the London Living Wage.

Policy implications

51. The development of this site will provide much needed genuinely affordable housing built to the highest of standards in terms of both design and energy efficiency. In particular the architects have been careful to adhere to the council's own planning policies as well as the London Housing Design Guide and the council's Employers Requirements.
52. The properties will be built to code level 4 of the code for sustainable homes and therefore will have to reduce carbon emissions, conserve fuel and energy as set out in building regulations (Part L) Value the Environment.

Housing strategy

53. The long- term housing strategy for the borough was agreed by Cabinet on 27 January 2014. It contains a vision for the future of housing in the borough, which consists of four principles.
- Principle 1: We will use every tool at our disposal to increase the supply of all kinds of homes across Southwark.
 - Principle 2: We will demand the highest standards of quality, making Southwark a place where you will not know whether you are visiting homes in private, housing association or council ownership.
 - Principle 3: We will support and encourage all residents to take pride and responsibility in their homes and local area
 - Principle 4: We will help vulnerable individuals and families to meet their housing needs and live as independently as possible.
54. A refresh of the Housing Strategy is underway.

Community impact statements

55. The new homes created as part of this resident led programme will enable some households to move from over crowded conditions whilst others will be downsizing, allowing the release of a range of different sized units to be re-let to others in housing need. An equalities impact assessment has been carried out to assess the implications of developing the Joseph Lancaster estate and further assessments will form part of the future schemes progression through the grant milestones.
56. The development of these sites will have wider regenerative benefits for the local community. No residents will be displaced as result of these schemes.
57. Under the Public Sector Equality Duty General Duty public authorities must have 'due regard' to the need to eliminate unlawful discrimination, harassment and victimisation as well as to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not.

58. The protected groups covered by the equality duty are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The duty also covers marriage and civil partnerships, but only in respect of eliminating unlawful discrimination.
59. The council's "Approach to Equality", which was agreed by cabinet in December 2011, outlines the council's legal duties under the PSED General Duty and its obligations under the Human Rights Act 1998. It also sets out the council's commitment to embedding equality and human rights within the day-to-day responsibilities of all members, officers and contractors, as a part of day to day business.
60. It is essential that when decisions are made they take into account the public sector equality duty's general duty (PSED General Duty) as set out in section 149 of the Equality Act 2010. Officers will undertake further equality analysis as the service works through implementation of the changes.
61. The council is an officially accredited London Living Wage (LLW) Employer and is committed to ensuring that, where appropriate, contractors and subcontractors engaged by the council to provide works or services within Southwark pay their staff at a minimum rate equivalent to the LLW rate. The grant agreement requires Leathermarket CBS and its contractors and subcontractors pay LLW and that this will result in quality improvements for the council and provides best value for the council. Anticipated benefits include a more incentivized workforce and improved staff retention. Following award, these quality improvements and any cost implications will be monitored.

Resource implications

62. The overarching grant agreement sets out the principles upon which council funding may be made available to Leathermarket CBS, and the role of the CBS in securing the delivery of new council homes, which will be managed by Leathermarket JMB on behalf of the council. It is anticipated that 161 council homes will be delivered through this agreement at an estimated cost of £50 million. Included within this will be a grant of £15,801,474 for the delivery of 40 council homes on the Joseph Lancaster site, which is underway.
63. All the future schemes approvals are subject to project agreements and milestone approvals. The non housing deliverables within the overall agreement are to enable later delivery of council homes. The grant funding provided to Leathermarket CBS will be met from resources supporting the Housing Investment Programme, including grant funding from the GLA and borrowing as appropriate.

Consultation

64. The Leathermarket CBS is carrying out an exhaustive consultation on all the schemes.
65. Given the scale and significance of the proposals, the Leathermarket CBS is making substantial efforts to engage the community around the sites. There was a significant amount of resident engagement for the Joseph Lancaster site in the formulation of the scheme design. CBS also engaged with a number of other

stakeholders throughout the preparation of the planning application including local councilors and officers.

66. This engagement resulted in a number of amendments to the proposal that are outlined in the statement of community involvement and design and access statement submitted with the planning application.
67. Extensive consultation has continued into the development of the design brief for the next sites on the Elim Estate. This development aims to deliver approximately 46 new homes, new community facilities and a new office for Leathermarket JMB (to free up the current office site for new Council housing development). CBS Officers have had well over 100 one-to-one conversations with Elim residents and 75% of residents have been directly engaged. 86% of residents engaged during the initial stage of consultation are supportive or unconcerned about new proposed development.
68. The proposed number of homes and community conversation timetable for the development sites in the overarching agreement is outlined below:

Leathermarket Rolling Programme		
Sites/Actual or potential no. homes	Total no. potential homes	Community Consultation
Joseph Lancaster Nursery site	40	Completed
Elim sites <ul style="list-style-type: none"> o Ball Court -24 o Garages - 10 o Triangle site - 12 	46	Nov 2018 – April 2020
Whites Grounds (between 2 blocks) (4 flats)	4	April 2020 – November 2020
Cluny – 2 sites – garages and gap next to block (8 flats)	8	April 2020 – November 2020
Decima Street	2	April 2020 – November 2020
Lawson Alderney Mews garages (7 houses)	7	June 2020 – April 2021
Falmouth Road	14	June 2020 – April 2021
JMB office site (40 flats)	40	July 2020 – June 2021
Total no. homes	161	

SUPPLEMENTARY ADVICE FROM OTHER OFFICIERS

Director of Law and Democracy

69. Cabinet is being asked in this report to approve the terms of the overarching grant agreement and the project grant agreement, and to note the proposal, under delegated powers, to proceed with the project at Joseph Lancaster Nursery.
70. External lawyers, Dentons UK & Middle East LLP, have been advising the council concerning the terms of the funding agreement and have ensured that the matters as set out in this report are reflected accordingly.
71. Cabinet members are responsible in accordance with paragraph 12, Part 3 of the

council's Constitution for the strategic management of the council's resources and is able to authorise the use from the Housing Revenue Account subject to the requirements as set out in paragraph 13 of the Constitution.

72. The power to provide housing accommodation on land acquired by the council (as local housing authority) is set out in Section 8 of the Housing Act 1988. The council has the power, at Section 111 of the Local Government Act 1972 to do any thing (including acts involving the expenditure of money) which is incidental to the discharge of a function. The provision of funding for the construction of housing accommodation to CBS is therefore a measure which is ancillary to the discharge of the council's housing function. In addition, the council has the general power of competence under Section 1 of the Localism Act 2011 to do anything that an individual may do. This would encompass the provision of funding to CBS for the delivery of council housing.
73. Cabinet members, when making a decision on the recommendations in this report are also required to have due regard to the public sector equality duty (PSED) in section 149 of the Equality Act 2010.
74. This duty, which is non delegable and continuing, requires the council to consider all individuals when carrying out its functions. Specifically, to have due regard to the need to eliminate discrimination, harassment, victimisation or other prohibited conduct; advance equality of opportunity and foster good relations between people with protected characteristics and those who do not. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation. The PSED also applies to marriage and civil partnership, but only in relation to the need to eliminate discrimination, harassment, victimisation or other prohibited conduct.
75. We note that, as referred to in paragraph 50, an equalities impact assessment has been carried out in relation to Joseph Lancaster project. Further assessments will be required in relation to each of the additional projects referred to in this report.

Strategic Director of Finance and Governance (H&M 19/118)

76. This report seeks cabinet approval for the council to enter into an overarching grant agreement and individual project grant agreements with Leathermarket CBS to deliver 161 new council homes to be managed by Leathermarket JMB on behalf of the council. The grant agreements seek to build on the recent success of the funding arrangement with Leathermarket CBS to develop Marklake Court, except that the council will retain ownership of the new properties. The grant agreements have been developed in conjunction with external legal advisors and set out the detailed terms and conditions upon which grants will be advanced to Leathermarket CBS, which are estimated to be in the region of £50 million.
77. The strategic director of finance and governance welcomes the intention to set up a separate agreement with Leathermarket JMB to ring-fence net rental income from schemes delivered through this programme as well as Marklake Court to contribute towards additional benefits to the council and wider community as outlined in paragraphs 35 to 38 of this report.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Kipling Garages, Weston Street, Bermondsey, SE1 – Housing Grant Agreement	Housing and Modernisation, Southwark Council, 160 Tooley Street, London SE1 2QH	Richard George, Programme Manager 020 7525 1222
Link: (please copy and paste into browser) http://moderngov.southwark.gov.uk/documents/s62971/Report%20Kipling%20Garages%20Weston%20Street%20Bermondsey%20SE1%20Housing%20Grant%20Agreement		
Former Joseph Lancaster School and Land at the Lawson Estate SE1	Housing and Modernisation, Southwark Council, 160 Tooley Street, London SE1 2QH	Richard George, Programme Manager 020 7525 1222
Link: (please copy and paste into browser) http://moderngov.southwark.gov.uk/documents/s81924/report%20former%20joseph%20lancaster%20school.pdf		
Joseph Lancaster Estate, Deverell Street, SE1 – Grant of Long Lease and Housing Funding Agreement	Housing and Modernisation, Southwark Council, 160 Tooley Street, London SE1 2QH	Richard George, Programme Manager 020 7525 1222
Link: (please copy and paste into browser) http://moderngov.southwark.gov.uk/documents/s74553/Report%20Joseph%20Lancaster%20Estate%20Deverell%20Street%20SE1%20-		

APPENDICES

No.	Title
Appendix 1	Overarching Grant Agreement (circulated separately)
Appendix 2	Project Grant Agreement (circulated separately)
Appendix 3	Joseph Lancaster Scheme Overview (circulated separately)
Appendix 4	Future Scheme Overview (circulated separately)

AUDIT TRAIL

Cabinet Member	Councillor Leo Pollak, Social Regeneration, Great Estates and New Council Homes	
Lead Officer	Michael Scorer, Strategic Director of Housing & Modernisation	
Report Author	Stuart Davis, Director of Development	
Version	Final	
Dated	4 December 2019	
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	4 December 2019	