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| <b>Item No.</b><br>9.              | <b>Classification:</b><br>Open | <b>Date:</b><br>2 February 2021                          | <b>Meeting Name:</b><br>Cabinet |
| <b>Report title:</b>               |                                | Ledbury Estate Towers - Ledbury Towers Residents' Ballot |                                 |
| <b>Ward(s) or groups affected:</b> |                                | Old Kent Road  |                                 |
| <b>Cabinet Member:</b>             |                                | Councillor Leo Pollak, Housing                           |                                 |

## **FOREWORD - COUNCILLOR LEO POLLAK, CABINET MEMBER FOR HOUSING**

Following a public meeting held by the council in response to concerns raised about fire safety in July 2017, an urgent investigation and report from Arup discovered that strengthening works required during their construction of the four tower hadn't taken place, resulting in the gas supply being switched off and a programme of works planned. After further structural investigations, and a subsequent options appraisal in late 2019 showing a range of refurbishment infill and redevelopment options, the council has worked closely with residents to safeguard the future of the estate while committing that any resident who wants to remain on the estate would have the option to do so. A 'whittling down' survey of these options towards the end of last year saw a clear majority for option D, which was for a phased redevelopment of the towers, starting with Bromyard House first and the building of to 333 new homes.

This report commits the council to running a yes/no Residents' Ballot on this final option in March 2021. It also details the council's Landlord Offer, detailing plans for phased redevelopment and a net increase in council housing prioritised for estate residents, as well as commitments to improved open space and play areas on the estate, larger safer and more energy efficient homes with private outdoor space, and a guaranteed right to return for all tenants and leaseholders, (including to non-residents leaseholders as per our commitment predating the GLA guidance on estate regeneration ballots) .

Needless to say, the final decision lies with Ledbury residents and the council will abide by residents' decision, as per the Great Estates terms for redevelopment proposals adopted in December 2018.

I want to put on record my deep thanks to the Ledbury Resident Project Group and TRA, together with the officers whose close collaboration to date has helped create this exciting new option for the evolution of the Ledbury estate.

## **RECOMMENDATIONS**

### **Recommendations for the Cabinet**

1. To note the detailed resident engagement to date and thank the Ledbury Resident Project Group for their work to date.
2. To note that the proposals align with the Great Estates programme for redevelopment proposals and as such the below five tests will be achieved.
  - a positive ballot on any new estate regeneration (as per the commitment in the Council Plan 2018-2022).
  - a net increase in social rent homes alongside increased density, to meet the acute need of families on our waiting list;
  - a right to remain for all rehoused tenants and leaseholders, for keeping communities together;
  - intensive co-design of redevelopment proposal, to become co-authors of a new estate plan;
  - a clear rationale for any redevelopment proposal, including an explanation of how this would increase housing supply (based on comprehensive density modelling) and/or a transparent stock condition survey
3. Agree to proceed to a Resident Ballot for the final option, on the basis of the proposals and commitments within the Landlord Offer Document, for the Ledbury Towers in March 2021. The final option is that the Towers will be demolished in phases, starting with Bromyard House first and replaced with up to 333 homes.
4. Agree to delegate authority to the Strategic Director of Housing and Modernisation in consultation with the Cabinet Member for Housing any amendments to the Landlord Offer document in advance of the Resident Ballot.
5. Agree to receive a report on the outcome of the ballot and a further report on the consequent delivery programme and financial implications in July 2021.
6. Agree to a variation to the Housing Investment Programme, making provision for the estimated costs of developing the delivery programme and assessing financial implications in advance of the Cabinet report in July.

### **Recommendations for the Leader of the Council**

7. Agree to delegate to the Cabinet Member for Housing the authority to approve a dedicated Ledbury Estate Local Lettings Policy subject to a majority vote in favour of the redevelopment option in the Resident Ballot.

8. Agree to delegate to the Cabinet Member for Housing the authority to agree a bespoke shared equity lease for the existing leaseholders in the Ledbury Towers which will allow sub-letting.

## **BACKGROUND INFORMATION**

9. Back in July 2017 the council held a public meeting to respond to residents' concerns about fire safety on the estate. Following an urgent investigation by structural engineers Arup, it was discovered that strengthening works on the Large Panel Structure of the towers had not been completed as previously thought. Southwark Council immediately switched off the gas supply and began a programme of works to make the towers safer for residents. Since then the council has been working closely with residents to discuss the future of the Towers. The council has been committed to making sure any resident who wants to remain on the estate had the option to do so and to work with residents on any final decision.
10. The Cabinet received reports on the response to the emergency situation on the Ledbury Estate on 19 September 2017, 12 December 2017, 6 February 2018, 16 July 2019, 29 October 2019 and 17 December 2019.
11. The four tower blocks are large panel system construction, built by Taylor Woodrow between 1968 and 1970 and are former GLC properties which transferred to Southwark Council in 1982. There are four 14 storey towers (Bromyard, Peterchurch, Skenfrith and Sarnsfield) comprising of 56 homes each on the Ledbury Estate. There are 224 properties in total.
12. In October 2018 the Cabinet agreed that the four high rise blocks should be refurbished and that land immediately adjacent to those blocks be used to build new homes subject to further investigations into the strengthening solutions.
13. In October 2019, Cabinet received a report on the outcome of the intrusive structural investigations undertaken by structural engineers, Arup. The report recommended much more extensive works than their previous report. Therefore Cabinet agreed that the options appraisal process on the future of the Ledbury Towers be reopened and a further report be received setting out the outcome of the resident consultation on the options appraisal process, based on the same red lines used for previous options appraisal.
14. Of the original 190 council tenanted homes, 167 are now empty homes. 15 of the original 34 leasehold properties are also empty, as the Council has bought them back from the leaseholders concerned.
15. As a result of the current situation with the COVID-19 pandemic, 103 of the empty properties in 3 of the 4 Towers have been utilised as temporary accommodation for those Southwark residents who were living in shared temporary accommodation. This made it difficult for those residents to comply with the government guidelines on social distancing.

16. Following the Cabinet decision on 17 December 2019, the Options appraisal process was reopened on the Ledbury Estate to allow for the options developed by residents in 2018 to be revisited following the additional recommendations that Arup have made to strengthen the blocks in their report dated 24 October 2019.
17. The options that were re-considered by residents were:
  - Option A - **strengthening the four towers**
  - Option B - **strengthening the four towers, and building between 87 and 130 new homes.**
  - Option C – **a mix of strengthening of one or more of the towers; and the demolition of the others and replacing them with new homes.**
  - Option D – **demolition of the four towers and replacement with new homes.**
18. The consultation was underway with residents working with Hunters on re-visiting new build and infill options to be put alongside strengthening and refurbishing options for the existing residents of the Towers and those tenants who have moved, to choose a preferred option, when it was paused in March at the start of the current COVID-19. This delay had a knock on effect on coming to a final decision on the future of the Towers and the subsequent commencement and completion of the works.
19. In July 2020 the consultation resumed through information in the weekly Ledbury newsletters and one to one phone calls replacing the face to face contact.
20. In October 2020, a household survey on the options took place. It was managed by an independent organisation, Open Communities, who act as Independent Tenant and Leaseholder Advisor on the Ledbury Estate.
21. The options survey sought to identify one preferred option that had resident support via a single transferable vote and to understand resident opinion on a housing block by housing block basis as well as by tenure.
22. Because of the previous consultations held with the Ledbury Towers residents in response to the emergency situation in June 2017, the ballot was not held in accordance with the GLA's requirements. This was because it would have excluded the residents with a right to return, and the non resident leaseholders who were promised in 2017 that they would have a say on the future of the Towers, which was before the GLA set out their rules on a residents Ballot.
23. The household survey on the options went to the 198 qualifying households (permanent tenants, tenants who have moved and have the

right to return, resident leaseholders and non-resident leaseholders) on 8 October 2020, with a deadline of 28 October 2020 for the receipt of the completed survey forms.

24. 101 papers were returned out of a possible 198 (51%) of which 7 were spoilt. There were 94 completed and counted papers (47%). This can be broken down as follows:
- remaining tenanted households - 75% - 18 out of 24 voted
  - tenanted households who have moved with the right to return - 39% - 61 out of 154 voted
  - remaining resident leaseholder households - 8 out of 9 voted - 89%
  - non-resident leaseholders - 70% - 7 out of 10 voted

A number of those families that have moved from the Towers advised us that they did not take part in the survey as they are very happy with their new home and have no intention of returning.

25. The results of the Options Survey were:
- Option A - 14% of the households voted for this as their first preference.
  - Option B - 15% of the households voted for this as their first preference.
  - Option C - 11% of the households voted for this as their first preference.
  - Option D - 61% of the households voted for this as their first preference.

Therefore the option of demolition of the four towers and replacement with new homes is the preferred option that will go through to the Resident's Ballot.

26. In addition all the residents and homeowners in the low rise properties on the Ledbury Estate, and the residents nearby on Commercial Way and Ledbury Street were written to with a copy of the Options Information Pack, inviting their views or concerns on the proposals.
27. The resident ballot will ask residents '*Are you in favour of the proposal for the re-development of the Towers on the Ledbury Estate?*' Where a majority of eligible residents vote 'yes' in favour of the proposals, it will be recommended to proceed with these proposals.
28. These recommendations will be subject to detailed financial appraisal which will be reported back to Cabinet in July 2021.
29. At the moment there are three different sub options of alternative layouts for the demolition and rebuild of the existing four towers. If there is a positive vote for the redevelopment of the Towers, and this is approved by Cabinet in July, architects will be appointed to consult further with residents on the designs to develop a final option that will go forward for planning permission.

## **KEY ISSUES FOR CONSIDERATION**

### **Resident Ballot**

30. As the Council supports the use of a Resident Ballot on estate regeneration and renewal, and in line with the consultation strategy adopted to date, a Resident Ballot comprising the following electorate will be held.
- remaining tenanted households in the Towers - 23 households
  - tenanted households who have moved from the Towers with the right to return - 155 households
  - remaining resident leaseholder households in the Towers - 9 households
  - non-resident leaseholders in the Towers - 10 properties

Because of the promises made to residents in 2017 as to who will be consulted on the future of the Towers, prior to the GLA Ballot requirements that were introduced in 2018, the Resident Ballot will not fully comply with GLA Estate Regeneration Ballots, and an exemption has been applied for to ensure eligibility for GLA grant funding.

31. In addition to a ballot, just like the Options Survey that was undertaken, the Landlord Offer Document will be sent directly to all the residents and homeowners in the low rise properties on the Ledbury Estate, and the residents nearby on Commercial Way and Ledbury Street inviting them to let the Council know their views or concerns on the proposals.
32. Estate Regeneration Resident Ballot requirements mean there is no minimum turnout needed, the result will be based on a simple majority, the ballot is conducted by an independent organisation and voter eligibility criteria apply.
33. The Council supports the proposals and as such will campaign for a positive vote in favour of the final option / proposals.
34. The results on the ballot will be presented to Cabinet in July 2021.

### **Delivery**

35. The delivery programme for the outcome of the Resident Ballot will be presented to Cabinet in July 2021 including:
- A financial appraisal
  - A procurement strategy
  - Resourcing plan
  - An updated Resident Engagement Plan
36. The delivery programme will provide for the duration of the programme allowing for flexibility and change.
37. If residents vote yes in the Resident' Ballot in March 2021, the draft

timetable to deliver the residents' choice will be:

- Secure design team, build contractor and planning permission – spring 2021 to summer 2022
- Phase 1 – summer 2022 to summer 2024
  - Demolition of Bromyard House
  - Build Replacement Homes
- Phase 2 – winter 2024 to winter 2027
  - Demolition of Peterchurch, Sarnsfield and Skenfrith Houses
  - Build Replacement Homes

### **Policy implications**

38. The option presented in the Resident Ballot (option D) will align with the Council Plan, Housing Strategy and Great Estates programme and the Protocol for Consideration of New Homes, Charter of Principles.
39. The detailed design of the redeveloped estate will also align with National, Regional and Local Planning policy frameworks including the Old Kent Road Area Action Plan (OKR AAP).
40. The design options will also be considered in light of the Council's Climate Emergency Declaration. The carbon footprint associated with the redevelopment will be modelled against the existing baseline and will include a calculation of the option against the uplift of carbon associated with delivering the number of homes in the redevelopment option.
41. Commitments established in the Landlord Offer Document (see Appendix 1) detail a proposed local lettings policy specific to the Ledbury Estate. The principles of the policy are outlined in the Offer Document, and reflect the promises made to residents when the emergency first arose in the summer of 2017.
42. The promises made to residents and homeowners in 2017 included a promise that all leaseholders would not be charged for the cost of the works to strengthen the towers. This promise included non-resident leaseholders. The cost of this strengthening work would exceed the cost of the building of a new home, therefore offering non-resident leaseholders the option of a shared equity property in a redevelopment option was financially beneficial to the Council. The current standard shared equity lease though prohibits a property being sublet, therefore nullifying the offer made that no leaseholder would be put in a worse position as a result of the works. Therefore it is proposed to offer a bespoke lease only for the existing Ledbury Towers leaseholders to allow them to continue to sublet their property in a new development.

### **Community impact statement**

43. Section 149 of the Equality Act, lays out the Public Sector Equality Duty (PSED) which requires public bodies to consider all individuals when carrying out their day to day work – in shaping policy, in delivering

services and in relation to their own employees. It requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people when carrying out their activities. The council's Approach to Equality ("the approach") commits the council to ensuring that equality is an integral part of our day to day business.

44. An Equality and Health Impact Assessment (EHIA) will be carried out independently and will focus on the potential effects, including health effects, likely to be experienced by those living and working in the community in light of their 'protected characteristics' under the Equality Act 2010. It will identify any differential or disproportionate effects, both positive and negative, on those with protected characteristics from the programme and from the options and sets out mitigation or enhancement measures that the council can put in place. It looks at these factors ahead of confirming decisions and policy. This will be completed and included in the July 2021 cabinet report, and the equalities impact of the sub-options for the final design will be considered as part of the ongoing design development and resident engagement process.

### **Resource implications**

45. The cost of Option D will be financed from a blend of sources including GLA grant, Housing Revenue Funding (HRA) and borrowing and sales from private homes.
46. The estimated cost of Option D (redevelopment of the towers) is between £72.4 to £94 million depending, on the new homes provided - an average of between £291,974 to £312,528 for each home. These costs allow for the replacement of the 205 Council homes, the replacement of 19 leaseholder homes and the construction of up to an estimated additional 109 new homes with 50% of new additional homes being council homes and 50% being private for sale homes. It is anticipated that the redevelopment will attract grant funding of up to £27.8m and generate receipts of £26m from the sale of private homes.
47. The shared equity lease offer for existing leaseholders will provide the council with a capital receipt upon the purchase of a share in a property by the leaseholder and the council will forego for an unknown period of time the capital receipt for the remainder of the property retained by the council. The council will, however, at a later date receive a further capital receipt either on the sale of the council's remaining share in the property, or through the redemption of the charge held against the property. This later capital receipt will also benefit from any uplift in value in the property market over the period, and so provide benefit to the Council in the longer term. There will be a small impact in terms of additional disturbance costs associated with the council's commitment to covering increased SDLT costs to the leaseholder. As there are only 18 leaseholders eligible to take up the shared equity offer, the financial impact to the council will not be significant.

48. Staffing for the delivery of the outcome of the Resident Ballot will be presented in the delivery programme due to be presented to Cabinet in July 2021.

### **Consultation**

49. The recommendation to proceed with a Resident Ballot is based on a resident-led decision making process.
50. The delivery programme will provide for ongoing consultation and engagement with residents in the Towers, former residents of the Towers with a right to return and stakeholders of the estate.

### **SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

#### **Director of Law and Governance**

51. The GLA requires councils carrying out certain estate regeneration projects to conduct a resident ballot process, to be eligible for GLA funding for the project. The proposal described in this report would engage those requirements.
52. The requirements are set out in section 8 of the GLA's capital funding guide. In most respects the ballot process described in the report will meet these requirements, for example in that the ballot will be conducted by an independent ballot, and the result will be decided by a simple majority of residents who participate. However the proposed criteria for eligibility to participate in the ballot are not identical to the criteria set out in the capital funding guide. The council has sought an exemption from the GLA by relying on the exception in the capital funding guide relating to demolition which is required to address safety concerns.
53. The report explains the detailed resident engagement process which has led to the indication of support for the proposal described as Option D. The report notes that consultation will continue in relation to the detailed design of the estate in the event that this is approved by the Resident Ballot (subject to detailed financial appraisal and confirmation by Cabinet). This process is at least as comprehensive as the approach taken on previous regeneration projects and so satisfies the legitimate expectations that residents may have in that regard.
54. Under s.105 Housing Act 1985 the council is obliged to maintain arrangements to enable those of its secure tenants who are likely to be substantially affected by the proposed demolition to be informed of the proposals and to make their views known; and to take their representations into account. The report explains that all current residents of the Towers, tenants who have relocated, and non-resident leaseholders, have been included in the consultation process.

55. Under Part 6 of the Housing Act 1996, an authority must have a scheme for determining priorities and procedures in the allocation of its housing (e.g. selection of secure tenants) and must not allocate housing except in accordance with that scheme (ss159 and 166A HA 1996). The council's Part 6 scheme gives effect to the legal requirement to give preference to certain groups of applicants, together with additional groups as a result of council priorities. However the council may depart from this scheme where it instead puts in place a local lettings policy which prioritises particular groups of applicants for particular properties (s.166A(6) HA 1996) provided that the cumulative effect of such schemes does not displace the system of reasonable preference set out in the Part 6 allocation scheme.
56. The Equality Act 2010 requires the council in the exercise of its functions to have due regard to the need to a) eliminate discrimination; b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it. Relevant protected characteristics for the purposes of the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
57. An Equality and Health Impact Assessment has been commissioned and the report confirms that its findings will inform the council's implementation of the option chosen by residents in the ballot.

**Strategic Director of Finance and Governance (H&M 20/121)**

58. This report seeks Cabinet approval to proceed to a Resident Ballot for the final option for the Ledbury Towers as outlined in this report. Although the report's recommendations do not give rise to any immediate financial implications, the outcome of the Ballot, should it proceed, will. In view of this, the report also recommends a variation to the council's Housing Investment Programme based on the estimated costs of developing the delivery programme. There will be a further report to Cabinet in July 2021 on the consequent delivery programme and financial implications, including a detailed financial appraisal.
59. As outlined in the financial implications section of this report, any outcome from the Ballot will form part of the Council's Housing Investment Programme and will be met by HRA resources supporting that Programme. If selected, the recommended option will incur significant capital expenditure, which is likely to necessitate a review of the overall Housing Investment Programme to ensure that it remains affordable and sustainable.

## BACKGROUND DOCUMENTS

| Background Papers   | Held At  | Contact                         |
|---|--|---------------------------------|
| Cabinet reports: Appointment of Keepmoat for emergency works at Ledbury Estate. 19 September 2017   | Constitutional Team, 160 Tooley Street, London SE1 2QH | Paula Thornton<br>020 7525 4395 |
| <b>Web link:</b><br><a href="http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=5751&amp;Ver=4">http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=5751&amp;Ver=4</a> (Item 19)   |  |                                 |
| Ledbury Estate – next steps update. 6 February 2018   | Constitutional Team, 160 Tooley Street, London SE1 2QH | Paula Thornton<br>020 7525 4395 |
| <b>Web link:</b><br><a href="http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=5755&amp;Ver=4">http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=5755&amp;Ver=4</a> (Item 8)  |  |                                 |
| Ledbury Estate – Arup structural survey report. 12 December 2017  | Constitutional Team, 160 Tooley Street, London SE1 2QH | Paula Thornton<br>020 7525 4395 |
| <b>Web link:</b><br><a href="http://moderngov.southwark.gov.uk/documents/s72761/Report%20Southwark%20Councils%20Buy-Back%20Offer%20for%20Ledbury%20Towers%20Leaseholders.pdf">http://moderngov.southwark.gov.uk/documents/s72761/Report%20Southwark%20Councils%20Buy-Back%20Offer%20for%20Ledbury%20Towers%20Leaseholders.pdf</a> |  |                                 |
| The way forward: Ledbury Estate high rise blocks. 30 October 2018   | Constitutional Team, 160 Tooley Street, London SE1 2QH | Paula Thornton<br>020 7525 4395 |
| <b>Web link:</b><br><a href="http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=6085&amp;Ver=4">http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=6085&amp;Ver=4</a> (Item 14)   |  |                                 |
| Ledbury Towers Update. 16 July 2019   | Constitutional Team, 160 Tooley Street, London SE1 2QH | Paula Thornton<br>020 7525 4395 |
| <b>Web link:</b><br><a href="http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=6085&amp;Ver=4">http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=6085&amp;Ver=4</a> (Item 14)   |  |                                 |
| Ledbury Towers Arup Structural Survey Report. 29 October 2019   | Constitutional Team, 160 Tooley Street, London SE1 2QH | Paula Thornton<br>020 7525 4395 |
| <b>Web link:</b><br><a href="http://moderngov.southwark.gov.uk/documents/s85459/report%20ledbury%20towers%20arup%20structural%20survey%20report.pdf">http://moderngov.southwark.gov.uk/documents/s85459/report%20ledbury%20towers%20arup%20structural%20survey%20report.pdf</a>   |  |                                 |
| Ledbury Towers Arup Structural Survey Report. 17 December   | Constitutional Team, 160 Tooley Street,                | Paula Thornton<br>020 7525 4395 |

| Background Papers   | Held At   | Contact                        |
|---|---|--------------------------------|
| 2019  | London SE1 2QH  |                                |
| <b>Web link:</b><br><a href="http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=6571&amp;Ver=4">http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=6571&amp;Ver=4</a> (Item 24) |   |                                |
| Overview and Scrutiny reports – Ledbury Estate update. 15 November 2017.  | Overview and Scrutiny Team. 160 Tooley Street                 | Shelley Burke<br>020 7525 7344 |
| <b>Web link:</b><br><a href="http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=308&amp;MId=5794&amp;Ver=4">http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=308&amp;MId=5794&amp;Ver=4</a> (Item 6)  |   |                                |
| Ledbury Estate – Management Responses to recommendations of the Independent Review of the Ledbury. 23 July 2018   | Overview and Scrutiny Team. 160 Tooley Street, London SE1 2QH | Shelley Burke<br>020 7525 7344 |
| <b>Web link:</b><br><a href="http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=308&amp;MId=6162&amp;Ver=4">http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=308&amp;MId=6162&amp;Ver=4</a> (Item 4)  |   |                                |

## APPENDICES

| No         | Title                   |
|------------|-------------------------|
| Appendix 1 | Landlord Offer Document |

## AUDIT TRAIL

|   |   |                          |
|---|---|--------------------------|
| <b>Cabinet Member</b>   | Councillor Leo Pollak, Housing                                  |                          |
| <b>Lead Officer</b>   | Michael Scorer, Strategic Director of Housing and Modernisation |                          |
| <b>Report Author</b>  | Mike Tyrrell, Director for Ledbury Estate                       |                          |
| <b>Version</b>  | Final   |                          |
| <b>Dated</b>  | 20 Jan 2021   |                          |
| <b>Key Decision?</b>  | Yes   |                          |
| <b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b> |   |                          |
| <b>Officer Title</b>  | <b>Comments Sought</b>  | <b>Comments Included</b> |
| Director of Law and Governance  | Yes   | Yes                      |
| Strategic Director of Finance and Governance                            | Yes   | Yes                      |
| <b>Cabinet Member</b>   | Yes   |                          |
| <b>Date final report sent to Constitutional Team</b>                    | 21 January 2021   |                          |