Capital Governance Principles – simple overview

1. Introduction

1.1. This document provides a simple overview of the procedures involved in the approval of the Council's Capital Strategy, Capital Programme, and the projects within. It covers the role of the key stakeholders in overseeing the approvals process, the management of future approvals and how the performance of the capital programme is monitored.

1.2. The procedure seeks to standardise the governance processes around capital approvals, ensuring that key documentation is completed and that there is sufficient Cabinet Member and senior management involvement in the decision making process at an early stage. A matrix of Cabinet Members and senior management will be consulted to ensure effective scrutiny and review of the projects coming forward for approval as well as improving upon opportunities for joint working.

1.3. The annual update of the capital strategy aims to ensure that it meets Member requirements, the Council's strategic aims, and embraces the objectives of the Councils Asset Management Plans for all service areas. The annual capital programme update aims to provide a period for review of the existing five year capital programme, and for review of inclusions/variations of the programme. This process should re-set and re-focus the capital programme where required and ensure that the previous year's programme has delivered the expected outcomes.

2. Project Approvals

Use of Corporate Resources including service funded proposals

2.1. The use of corporate resources will be robustly controlled to ensure that this finite resource can be effectively managed and focusses on the Council's key priorities. The impact on other policies will be considered, such as the Treasury Management Strategy, to ascertain the impact of corporate borrowing. Any requests for the use of corporate resources will follow the process highlighted below;

A
- Submitted as part of Annual Programme Refresh – typically commencing in the autumn

B
- Project Leads/managers should prepare a Strategic Outline Case (SOC) – to provide a brief overview of the proposed scheme. (Capital and Revenue Finance will support the production of this business case)

C
- The proposal should initially be presented to service Strategic Director for approval to move forward

D
- Corporate Finance will then present all proposals to the Capital Programme Monitoring and Delivery Board. This will support cross directorate working.

E
- Proposals will then move forward to Senior Leadership Team, the Chief Executive Officer and Leader of the Council who will recommend those schemes to present to Cabinet and Council

F
- Approved Projects will be included into the Capital Programme, at the point in time they have been approved by Full Council. However, signed off business cases will be required to commence expenditure on projects.

2.2. It is important that services work directly with their Finance and Procurement Business Partnering Teams from the point of considering a project bid. This will help to ensure that the bid is taken through the appropriate review and scrutiny ahead of submission, considers all financial implications on both capital and revenue budgets, and built into procurement planning to ultimately give the project, should it be approved, the best chance of a successful delivery. Involvement from procurement at the project planning stage will assist in ensuring that the proposed timeframes for delivery of the scheme, in relation to external contracts, are realistic and feasible. The service Head of Finance should be notified of all bids and their approval for submission gained, this will also help to ensure the project is brought into monitoring arrangements and necessary financial work carried out to enable project delivery.

2.3. Variations to any corporately funded project, seeking additional resources will have to follow the same process as above, however:

- If there is a need to vire a budget from one project to another, it can be completed at any point in the year. For example, if a Directorate requires additional resources to support project A, and have project B that they have an underspend on due to savings/efficiencies, they can request that the corporate resources for project B are vired across to project A. This would, of course, have to be reported through to Cabinet. However, variation limits apply as prescribed below.

2.4. Virement of under and overspends on schemes must be approved at the appropriate levels as set out below:

- Virements under £100k can be approved by Strategic Director in Consultation with Cabinet Member.
- Virements from £100-£400k can be approved by Strategic Director in Consultation with Cabinet Member, Leader, CEX and S151 Officer.
- For project virements of £400,000 or more, Cabinet approval will be required, as this is a key decision. This can be undertaken via the Council's Financial Monitoring Report or a specific project Cabinet report, depending upon the complexity of the reason for variation and scheme. The route to Cabinet approval will be determined on a case by case basis by the Chief Finance Officer. These changes will be referred onto Council. Please note, a key decision can also be required if the change to the project;

    - Relates to the capital or revenue budget framework that is reserved to the Council
    - Result in income, expenditure or savings of £400,000 or more
    - Have a significant effect on two or more wards

2.5. In order to gain the relevant sign off to a variation officers should complete the 'Capital Budget Variation Form', shown at appendix A. The Capital Programme Monitoring and Delivery Board will consider a process for carrying out invest to save schemes. Once a process has been developed this guidance will be updated.

2.6. Should a directorate no longer be able to deliver a project that has been approved for delivery by Council, as part of the Council's Budget Report, the removal of the project budget must be reported back to Cabinet and referred onto Council as part of the Council's Financial Monitoring Report. The budget for a cancelled scheme cannot simply be moved to offset pressures on other programme overspends.

Borrowing Rates for corporate borrowing

2.7. Borrowing Rates used for corporate borrowing will be set at 3% for short term borrowing (10 years or less on asset life) and 3.3% for Long Term borrowing. The financial assessment of borrowing costs must be carried out by the Financial Accounting Team. There may be occasions where it makes financial sense to carry out an assessment using different rates, such as current PWLB rates, to provide a like for like comparison but the charges to the service would normally still be based on the corporately set rates.

3. Grant Bids & Acceptance

3.1. All Grant Bids should be prepared by the service in conjunction with Finance. For capital bids these should have initial review by the Head of Finance for the relevant directorate, with the capital implications reviewed by the Capital Finance Team.

3.2. When the bid has been prepared by the service and reviewed by Head of Finance, it will require the following sign offs prior to submission, in all cases:

- Strategic Director for delivering service
- Cabinet member
- Leader
- CEX
- Chief Finance Officer

3.3. In order to gain and evidence these approvals the 'Application for Funding Form', shown at appendix B, should be completed. All bids should demonstrate how they contribute towards the Council Plan and how the bid meets an existing priority.

3.4. Grant Acceptance and grant claims will only require sign off via the Strategic Director or relevant Assistant Director, the Head of Finance for the Directorate (in consultation with the Capital Finance Team) and the Chief Finance Officer where the grant terms and conditions require it.

Annual Grant Allocations:

3.5. For the annual grant allocations, in all cases an indicative budget line will have already been included within the approved capital programme. This may be based on a confirmed amount, mix of confirmed and estimates or fully estimated. This does not however mean that the schemes to be delivered from within those indicative allocations are approved. Therefore, approval is required to drawdown these annual grant allocations to specific schemes, this should be done at the outset of the financial year via a Cabinet report (like the LTP Grants/Highways Grants), with minor variations managed by exception during the year.

3.6. Where the service is looking to gain approval for the use of an annual allocation they have a number of options in how to proceed. The service can bring forward a report to the Capital Programme Monitoring and Delivery Board (CPMDB) covering the broad aims of the annual allocation, confirming the specific grant levels, how the grant will be utilised in year, and on what schemes. This will normally take the form of a Strategic Director report that will first be taken to and ultimately approved by the Strategic Director in consultation with Cabinet Member. The Finance Business Partners and Capital Finance Team will assist the service in the production of this report. Once approved the details of the report will then be covered within the next capital monitoring report to Cabinet, covering any key budget adjustments required. From that point the annual allocation is fully approved. It is therefore recommended that this report is typically brought forward for approval ahead of the new financial year, where timeframes for confirmation of grant levels allow.

3.7. Alternatively, the service may choose to gain approval for the use of their annual allocation via a Cabinet report, a route used to ensure Members are in full agreement with the proposed use of the grant allocation. The Cabinet report would follow the same route as above, Strategic Director approval in consultation with member, CPMDB, SLT and then Cabinet however, it would be reported at Cabinet as an individual report rather than as part of the capital monitoring report.

3.8. Finally, the service may choose to bring forward schemes for use from the annual grant on a project by project basis, in which case they would follow the grant variation process indicated in section 2.4 of this report. However, the aim should be that the annual grant allocation Cabinet reports would include all proposed schemes for the year ahead.

3.9. If a variation between schemes within the annual allocation is required and the movement is low in value it can be approved prior to being noted at Cabinet, using the variation levels indicated in section 2.4.

Other Grant Allocations:

3.10. The following section will cover the approval of other grant allocations not covered by the annual grants, in these cases the business case approach will be followed. The inclusion of other grant funded projects requires a tiered approach to the levels of delegation. The approvals required are those indicated for a budget variation in section 2.4 of this guidance.

3.11. All new inclusions will first require a business case to be produced and considered by the Head of Finance for the relevant directorate and Capital Finance Team prior to being submitted for approval through the variation process. For example, at the point a new grant fund is being added to the Capital Programme it should have already had a bid submission approved via appendix B and have an approved capital budget variation form completed via appendix A.

3.12. Through these processes the Capital Team and CPMDB will review the schemes submitted for approval to ensure the financial implications have been effectively completed and all capital and revenue financing implications considered and understood.

3.13. The format of the business case can take a couple of different formats. Typically, the service will be required to complete an RMBC business case (SOC) and potentially an OBC, dependent upon the complexity of the project. However, where the grant bid requires the production of an external business case as part of the bidding process, as is required for most South Yorkshire Mayoral Combined Authority funding, this business case can be used to support the internal approvals process. In this scenario an internal business case may not be required (if this external business case is sufficient to cover all internal financing questions) to avoid duplication of effort. All external business cases produced by the service should still be completed in conjunction with the Finance Business Partner and Capital Finance Team and submitted only once internal financial approval is provided

3.14. The new grant fund will be added to the Capital Programme once the grant bid has been approved but held on a holding code until the business case process is complete, these grants will be added to the Capital Programme as part of the Council's Financial Monitoring Cabinet reports.

3.15. For any grant funded schemes that require match funding from corporate resources, they must follow the same route as any other corporate resources bid with the grant simply acting as match. ***Failure to follow these processes will result in a delayed approval of the project.***

3.16. If a variation between schemes is required it must follow the approval levels outlined in section 2.4.

Use of HRA Funding

Annual HRA Allocations:

3.17. For the annual HRA allocations (cyclical work on Council Dwellings), in most cases an indicative budget line will have already been included within the approved Capital Programme. This does not however mean that the schemes to be delivered from within those indicative allocations are approved. Therefore, approval is required to drawdown these annual allocations to specific schemes, this can be done at the outset of the financial year, or during the year following the process for one off grant allocations.

3.18. Where the service are looking to gain approval for the use of an annual allocation they have a number of options in how to proceed. The service can bring forward a report to the Capital Programme Monitoring and Delivery Board covering the broad aims of the annual allocation, confirming the specific grant levels, how the grant will be utilised in year, and on what schemes. This will normally take the form of a Strategic Director officer decision report in consultation with the Cabinet Member. The Finance Business Partners and Capital Finance Team will assist the services in the production of this report. The details of the report will then be covered within the next capital monitoring report to Cabinet, covering any key budget adjustments required, from that point the annual allocation is fully approved. It is therefore recommended that this report is typically brought forward for approval ahead of the new financial year, where timeframes for confirmation of grant levels allow.

3.19. Alternatively, the service may choose to gain approval for the use of their annual allocation via a Cabinet report, a route used to ensure members are in full agreement with the proposed use of the grant allocation. The Cabinet report would follow the same route as above, SD and relevant member approval, CPMDB, and then Cabinet however, it would be reported at Cabinet as an individual report rather than as part of the capital monitoring report.

3.20. If a variation between schemes within the annual allocation is required the variations process 2.4 should be followed.

Other HRA Allocations:

3.21. For the approval of other HRA allocations not covered within the cyclical HRA programme (i.e one off new HRA schemes such as new build projects), in these scenarios the business case approach will be followed, as indicated within the ‘other grant allocations’ section above, or within the corporate resources approval section if the scheme is requesting corporate resources.

4. Documentation

4.1. Strategic Outline Case (SOC): This is the opening business case document that should be used to get initial buy in to a project proposal. It is intended to be brief and provide an outline view of what the project is aiming to do, provide indicative costs, outputs and timeframes.

4.2. Strategic Outline Programme (SOP): This is the same as above, but where the project lead is looking to gain approval for a programme of work rather than an individual project. For example, where the service is looking to carry out capital improvement works to the Council's Property on a cyclical basis, they may choose to produce a SOP. The document would cover the key themes of the type of work they will be looking at, what is in and out of scope, and indicative potential projects that make up the programme. However, the SOP will provide them with a degree of flexibility to adjust the properties that they tackle year on year.

4.3. Outline Business Case (OBC): Essentially this is a much more detailed business case to be used for more complex schemes. Each section is completed with greater detail, full options appraisals and detailed financial appraisals. For example, a major project like new build housing would require an OBC.

5. Monitoring

5.1. All project leads will have to provide monthly forecasts, through the collaborative planning system, on the performance and potential outturn of their project. The Capital Finance Team will have responsibility for monitoring the performance of the overall approved Capital Programme and will pull together on a monthly basis a detailed monitoring report. The monitoring report will provide a current position of forecasts, funding, new approvals and variations, grant awards and a brief view of the 5 year Programme position. This detailed version will be used to create a report for the CPMDB, and service specific updates for service DLT's (although in practice these may only go to DLT's quarterly).

5.2. A brief overview monitoring report will be presented for the purposes of providing a monthly update to SLT and a bi-monthly update to Cabinet. This report will provide highlights of the current forecast position, note the key budget changes and grant approvals and any key changes within the funding profile of the capital programme. The report will also provide officers with a forecast position on projected capital receipts in the year.

5.3. The Programme will be updated at least annually and monitored regularly throughout the year. Monitoring shall be carried out to a timetable and in a format prescribed by the Chief Finance Officer. Any significant variance from the capital expenditure profile must be notified immediately as specified in the Council's capital governance arrangements. Initially, a forecast variance in excess of £100,000 will need to be identified through the monthly monitoring cycle, if the service area cannot resolve the issue it should be escalated to their Strategic Director for a directorate solution, if the wider directorate are unable to find a resolution then the issue should be reported through to the Senior Leadership Team.

6. Tenders

6.1. Service Finance Teams and the Capital Finance team will play a role in the review of tender documents to ensure that they are being undertaken for approved capital schemes, within budget, and for the items specified within the approved business case (i.e to flag any significant changes in project scope). However, it is not the responsibility of Finance staff to sign off tender documentation for approval, Finance are simply to agree that the financial implications have been reviewed, are reasonable and within budget. Project Managers and Project sponsors are responsible for ensuring that they follow the Council's Financial and Procurement Procedure Rules.

7. Capital Programme Monitoring and Delivery Board

7.1. The Capital Programme Monitoring and Delivery Board is responsible for the oversight of the Council's approved Capital Programme. Its role is to manage the approvals process and make recommendations to SLT on new project approvals, variations and completion reports. It will also have a key role to play in the performance analysis of the Capital Programme, reviewing the financial performance of the Programme on a monthly basis and reviewing the output/outcome performance. As part of the approvals process CPMDB will play a key role in the review and scrutiny of Project Management Documentation, including Strategic Outline Cases (SOC's), Strategic Outline Programmes (SOP's), and Outline Business Cases (OBC's)

7.2. The group will also provide a key function in approving the use of and acceptance of capital grants, as well as being the gateway to gaining approval for the use of other key council resources such as capital receipts and borrowing. In line with the procedures, steps to approval outlines above.

Terms of Reference

Standard Agenda Items:

7.3. To manage the flow of approvals for project management documentation (SOC/SOP), and the performance management of the Capital Programme this meeting will have some standard agenda items.

1. **Financial Monitoring Report** – an overview report covering the main issues with the current forecast position of the Capital Programme. This report would flag up areas or concern that may lead to budget variations or indeed savings where more works could be commissioned.
2. **Services Presentation** - It is envisaged that each programme lead (Service Director or Service lead) would present an update on the progress of the key schemes within their programme. This should help to promote good practice,

prevent silo working and ensure that we are continually pushing the delivery of capital projects and programmes.

3. **SOC / OBC requesting approval –** review any business cases for new scheme inclusions or variations to ensure they have strategic fit and meet members aims and objectives, and all key areas of the case have been addressed.
4. **Provide updates on the annual Capital Programme refresh and development of the capital strategy** – this particular item will not always have a lot to report but at key points in the year will be vital.
5. **Capital Grants -** Provide an opportunity for Grant bids to be presented to CPG for approval. This will help to ensure that Finance are involved in and aware of bids for any capital grants to ensure that linked financial implications can be reviewed and any planned schemes pushed through the governance process.
6. **Resources Reporting –** Update provided on the current resources position of the Capital Programme, focussing on its affordability and flagging up any concerns around levels of planned grant against those grants we have received.

Roles and Responsibilities of the board:

- Agenda to be collated by PA to the Strategic Director - Finance & Customer Services
- Capital Team – for each CPMDB to provide a list of SOC's, OBC's requiring approval
- Capital Finance Manager / Principal Finance Officer – to produce and present the monitoring report
- Project Leads or Directorate leads to attend CPMDB to present or take questions on their SOC/OBC.
- CPMDB members – to provide a challenge to the approvals being put forward to ensure they are robust and have a strategic fit and meet members aims purpose for inclusion into the Capital Programme.

Membership -

Strategic Director of Finance and Customer Services/ Assistant Director – Financial Services	Chair
Head of Corporate Finance	Deputy Chair
Finance Manager Financial Accounting	Main reports / updates presentation
Head of Finance CYPS	
Head of Finance Adults	
Head of Finance Regeneration & Environment	
Key service leads	
AD/HOS For Highways / Transportation	
AD/HOS for Regeneration (Town Centre development / AMP schemes / Parks & Open	

Spaces)	
AD/HOS for CYPS	
AD/HOS for Adults	
AD/HOS for Housing	
AD/HOS for F&CS major schemes – for example ICT	

8. Roles and Responsibility

- It is the responsibility of the project lead to produce and bring forward for approval the correct project documentation.
- It is the responsibility of Directorate Finance Business Partners and Capital Finance Business Partners to support the project leads through the process and to review and scrutinise the quality of the documentation provided, in order to ensure its appropriateness.
- It is the responsibility of the Capital Finance Manager to ensure that the governance procedures are followed robustly.

9. Housing Capital Finance Policy

9.1. The purpose of the Housing Capital Finance Policy is to set out how capital resources will be utilised to support the Housing Growth strategy, how Housing Revenue Account (HRA) borrowing will be monitored and controlled, and how appropriations between the HRA and General Fund (GF) will take place. It will set out clear rules and procedures to follow in the management of Housing capital resources and in particular borrowing to ensure that the Council's Housing Growth plans align with the requirements of the Council's Treasury Management Strategy, CIFPA Code of Practice and CIPFA Prudential Code.

HRA Capital Receipts – Right to Buy (RTB) retained – non 141

9.2. These are proceeds from the sale of council housing stock to tenants that the Council is able to retain as part of the RTB pooling process, that are not retained under the 141 regulation. These receipts are unrestricted and can be used to finance HRA or General Fund capital expenditure as defined in the Capital Finance and Accounting Regulations.

9.3. This policy seeks to earmark these receipts for use as part of the Housing Growth Strategy, for schemes that will enable or deliver new housing units, to support the Disabled Facilities Grant Programme or to meet any general fund requirement to a HRA scheme as required. The only circumstance whereby these receipts would not be used for new housing provision would be if there was a need to appropriate land from the GF to the HRA. In this scenario, if the Council agreed that the appropriation of the land to the HRA was appropriate, the HRA forgoes it's call on a level of RTB receipts, equivalent to the agreed land value, as dictated by the Council's valuers. Those receipts would then be used to support the GF capital programme, compensating the GF for the lost sales receipts, if that land had been sold on the open market.

This policy has two key benefits;

1. it enables the Housing Growth Strategy to be progressive and ambitious by removing a barrier to delivery, i.e the GF selling suitable sites for development on the open market rather than appropriating them to the HRA,
2. enabling the GF to be compensated for lost receipts

Borrowing

9.4. The introduction of the prudential code in 2004 allows the Council to undertake additional borrowing. This borrowing is subject to the requirements of the Prudential Code for Capital Expenditure for Local Authorities. The Council must ensure that unsupported borrowing is affordable, prudent and cost effective. This has provided the Council with the flexibility to borrow to support capital expenditure, as demand and business need have dictated the requirement to do so.

9.5. In October 2018, the HRA borrowing cap was lifted providing councils with a greater opportunity to use prudent borrowing to stimulate Housing Growth. The Council has yet to make use of this additional borrowing capacity, and this policy seeks to identify the levels and controls that need to be established around HRA borrowing to ensure a controlled approach is maintained. Whilst the use of additional borrowing does indeed present a significant opportunity to ramp up Housing Growth projects, the Council needs to ensure that it fully understands the additional cost implications it would be entering into, and ensure it has controls on the levels of borrowing / interest it commits to.

9.6. Borrowing can be used to fund any capital expenditure, however it's prudent to use borrowing on long life assets, so that the borrowing terms reflect the useful life of the asset.

HRA Borrowing Levels & Controls

9.7. At present the HRA is paying interest annually on debt and not paying down any debt on an annual basis. In order to pay down some of the debt outstanding the HRA would need to make a charge from HRA revenue to the Councils Capital Adjustment Account, at present there is plan to do so within the HRA Business Plan. If the HRA chooses to increase the levels of borrowing then provision needs to be made within the revenue accounts to meet the additional interest payments. At present the level of HRA debt is reported through the Treasury Management Strategy, through the prudential indicators. These indicators provide a ratio of HRA interest payments to net revenue spend.

9.8. This ratio indicates the percentage of the HRA's annual revenue expenditure that is solely to meet the financing costs of debt, i.e to meet the interest payments. This percentage needs to be maintained at a manageable level, too low may indicate the HRA is not making sufficient use of its borrowing abilities, too high and it reduces the HRA's capacity to fund current revenue maintenance and repair issues leading to a deterioration of the stock. This policy will set a top level for the ratio, at 20%. This limit could then only be breached for a short period (less than 12 months) if an opportunity to borrow early presented itself, so long as within the next 12 months the percentage falls back within the limits.

Appropriations between the GF and HRA

9.9. From time to time the HRA may wish to make use of a plot of land that is owned by the GF, in this scenario the HRA would have to appropriate the land from the GF. The process requires both parties to agree to the transfer, an agreed value of the transfer (land value), adjustment to be processed to the Capital Financing Requirements for the GF and HRA and finally re-worked interest payments for the HRA. For example, if a plot of land was appropriated from the GF to the HRA, the GF CFR would need to be reduced by £1m with the HRA CFR increasing by £1m. The HRA's share of debt would have therefore increased, leading to an increase in interest charges.

9.10. This policy will therefore allow both parties to benefit from an appropriation, via the process outlined below.

9.11. If there was a need to appropriate land from the GF to the HRA, and the Council agreed that the appropriation of the land to the HRA was appropriate, the HRA forgoes it's call on a level of non-ringfenced RTB receipts, equivalent to the agreed land value, as dictated by the Council's valuers. Those receipts would then be earmarked for use on the GF capital programme, thus compensating the GF for the lost sales receipts, if that land had been sold on the open market, and allowing the HRA to access to the strategic plot they require.

Example: HRA appropriate £1m plot of land from the GF.

1. HRA define that a plot of land is a strategic priority and look to take this from the GF.
2. GF agree to the appropriation rather than selling on the open market.
3. Cabinet approval is sought for the appropriation

4. Accounting adjustments are made, HRA CFR increased by £1m, GF CFR decreased by £1m. Future interest charges adjusted accordingly.
5. The HRA now forgoes its call on £1m of the free to use RTB Capital Receipts, allowing them to be used to support GF capital expenditure.
6. HRA gets the plot of land it requires whilst the GF is compensated with access to RTB Capital Receipts, for the perceived loss of land sales.

Appendix A

CAPITAL BUDGET VARIATION FORM'

NAME OF PROJECT:

PROJECT LEAD:

PROJECT SPONSOR (AD OR SD):

Please select the variation level:

VARIATION LEVEL		
	Less than £100k	*Strategic Director in Consultation with cabinet member*
	£100 to less than £400k	*Strategic Director in Consultation with cabinet member, Leader, CEX and S151 Officer*
	£400k or more	*Strategic Director in Consultation with cabinet member, Leader and S151 Officer and reported for approval by Cabinet and Council*

Please describe the reason for the variation:

Please describe the budget change values and funding impacted (tables can be used to help):

Please outline the impact on not making the change:

Approval to submit application

Name	**Position**	**Date**	**Comments**
	Strategic Director		

	Cabinet Member		
	CEX (over £100k only)		
	Leader (over £100k only)		
	S151 Officer (over £100k only)		

Appendix B

APPLICATION FOR GRANT FUNDING

NAME OF GRANT:

AMOUNT:

FUNDING BODY:

DEADLINE TO SUBMIT APPLICATION:

Reason for bid submission:

Briefly outline here the merit of the grant bid, if successful what the Council would be expected to deliver/timeframes to deliver and any anticipated financial implications, clawback risk or match funding.

Shared with Head of Finance: ***Yes/No*** **You must ensure your HOF is aware of the proposal.*	*Rob Mahon – FCS / ACX / Capital* *Owen Campbell – ACH* *Richard Young – R&E* *Neil Hardwick- CYPS*	**HOF COMMENTS:** *Supportive of bid / concerns/ impacts to note.*

Approval to submit application

Name	**Position**	**Date**	**Comments**

	Strategic Director		
	Cabinet Member		
	CEX		
	Leader		
	S151 Officer		