Independent Report on historic property transactions in
Kensington & Chelsea by Kroll and Associates (the Kroll report)

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1. Attached to this covering note is an independent report from Kroll into four historic property transactions in Kensington and Chelsea.[i] Two of these transactions involved releasing public assets so that they could gain commercial rental income. The other two involved reconfiguring publicly used facilities so as to reshape their use and gain commercial rental income.

2. The independent Kroll report follows their in-depth forensic examination of these four transactions (based on an investigation of both published and unpublished material). The investigation itself follows on from complaints made by some community stakeholders about the overall conduct of the Council in respect of its historic approach to property transactions and the alleged disregard afforded to community concerns and the prospect of adverse community impact. Kroll shared their provisional findings with those individuals involved in these matters in the past (Members as well as officers), they interviewed several people in depth; and the attached report is their final draft for the Council's consideration.

3. The independent Kroll report shows that previous decisions, in the period from 2011 to 2016, were based on a strategic rationale to maximise rental income so as to support the Council's revenue base. While forms of information provision about the Council's objectives for these transactions were in place at that time, we can see that a wider and more open style of community engagement was not an aspect of the Council's general approach. The Kroll report identifies no wrongdoing on the part of Members nor officers but it does highlight a number of areas for the Council to consider its future approach.

4. We have had an outline discussion with the Council's external auditors about the Kroll report. They broadly suggest that the report identifies some deficiencies in the Council's previous approach to framing options for some aspects of asset strategy, but that these were in: (a) the implementation of the arrangements, rather than the design of them; and (b) did not lead to any perverse decisions or unreasonable decisions. They have however indicated that they would want more time to consider the 'value for money' aspects of the matters referred to in the Kroll report.

RECOMMENDATIONS

5. It is recommended that:

   5.1. this covering report and the detailed Kroll Report (together with its Executive Summary) be considered at future meetings of the Audit & Transparency Committee; the Overview and Scrutiny Committee, and then the Leadership Team;

   5.2. the Executive Director for Housing & Social Investment bring a comprehensive report to a meeting of the Leadership Team on the Council's new approach to social value, social investment and community benefit balancing these factors with the Council's financial duties in respect of broader service delivery, as well as asset and property management generally;

   5.3. the Executive Director for Housing & Social Investment, together with the Executive Director of Environment & Communities, bring a further report to the Leadership Team on the Council's approach to all potential "assets of community value". Such report to be prepared jointly with the Director of Planning, the Director of Social Investment & Property, and the Director of Communities;

   5.4. open engagement with potentially impacted communities precedes formal decision making processes on significant service change, investment or other plans in line with the Charter of Public Participation, and the commitments the Council has made to embedding this Charter in all its work;

   5.5. the Council's monitoring officer and the Director of Audit, Fraud, Risk and Insurance provide guidance on the sufficiency, appropriateness and adequacy of officer drafted reports so as to ensure that Members receive rounded, objective, impartial, balanced and best professional advice in achieving the Council's agreed policies and plans; and

   5.6. Members and officers undertake policy and professional development in how the Council ought to include best value and community benefit in all aspects of the Council's service programme areas (and not simply in asset and property management matters) and/or in those areas of work explicitly defined as part of the Social Investment Programme.

Why is this Independent Report needed?

6. Just over two years ago, in October 2018, Kensington College published an independent forensic examination of the College's earlier decision to sell their North Kensington site to the Council. As Members will be aware, the Kensington and Chelsea College ("KCC"), is split into two centres:

- The Kensington Centre, located at Wornington Road; and
- The Chelsea Centre, located at Hortensia Road.

7. On 19 July 2016 KCC sold the Wornington Road building and land freehold to RBKC on a sale and three-year leaseback agreement. Under this sale and leaseback agreement, RBKC agreed that KCC could lease the Wornington Road site from the Council for three years following the sale at an annual rent of £1.1 million. The headline value of the transaction was £28.65m from which £3.3m was deducted to take account of the three-year lease agreement. The net cash sale value to KCC was therefore £25.35m.

8. According to the College itself, the independent report by Kroll catalogued a failure of management and governance at the College in several areas including:

   - lack of consultation with the local community in the period before the sale;
   - failure to consider and evaluate alternatives to a sale to RBKC (for example, potential proposals from private developers);
   - shortcomings in determining the final sale price of the Wornington Road site; and the
   - exclusion of College student and staff governors before the final decision was made to sell the College to RBKC.

9. At the time of the report's publication, Kensington and Chelsea College Interim Chair Ian Valvona said:

   "The sale of the College's Wornington Road site to the Royal Borough of Kensington and Chelsea was plainly the wrong thing to do – even when you consider the College's very difficult financial situation in 2016.

   "Today the College apologises for that sale and I want to recognise the role of the local community and the Save Wornington College Campaign for helping to ensure that the full details of this sale finally saw the light of day.

   "The College's core mission is to focus relentlessly on outstanding teaching and learning for our students and meet the needs of our local communities.

   Selling the Wornington Road site to RBKC in 2016 was not in the interests of that mission or the College's local community but the College is now determined to look forward and work with the community, staff and Borough to build a bright future together."

10. At the same time, Kensington and Chelsea College Chief Executive and Principal, Andy Cole said:

"The report highlights shameful behaviours of past management in excluding staff, students and the local community from its discussions and decision making over the sale. There has been a complete break with the past across the last year at Executive Leadership as well as Board level and we are in negotiations with RBKC to determine how the Wornington Road site will serve the needs of its communities into the long term."

11. The report was strongly welcomed by the Save Wornington College Campaign Group, who campaigned effectively about this issue from the perspective of it needing to be a positive Grenfell legacy project. From October 2018, the Department for Education convened meetings with all relevant parties, including the Council, the College, the Save Wornington College Campaign and the Greater London Authority, to identify the best way to secure a future for the College at Wornington Road.

12. All parties agreed, including the Council, that a long-term solution for the site was needed and that a sale to the Government, combined with further investment from the DfE, was the best way forward. In July 2019, the Leadership Team agreed, in principle, to accept an offer for the site from the DfE of £10M. Although the sale price was significantly lower than the jointly agreed valuation figure of £22M, it was considered that the discount was justified on the basis that a thriving College in the borough will bring benefits that will help the Council to promote or improve the economic and social wellbeing of the area.

13. Final Heads of Terms for the sale were agreed by the Leadership Team in December 2019. These included special legal protections for the long-term use of the site, specifically a long-term lease to the college at a peppercorn rent and a restrictive covenant that guarantees educational and community use. The DfE also pledged significant investment in the college and the refurbishment of both the Wornington Road site and the College's Chelsea centre, totalling £32M. In February 2020, Kensington and Chelsea College completed a merger with Morley College, the conclusion of a separate process, led by the Further Education Commissioner, to secure the long-term financial viability of the College as an institution.

14. Following the publication of the Kroll report, the Council held discussions with our external auditors, Grant Thornton, as to the sensibility of the Council conducting its own review of a number of historic key property transactions (including the purchase of the College site at Wornington Road). Our external auditors agreed with the proposal that an independent forensic review was necessary in the circumstances. It was therefore decided, after discussing likely scope and costs with a few competent external audit firms, that to assure wider credibility with community interests, as to any reviews authoritative independence, that the Council ought to commission Kroll to perform a detailed and forensic investigation of several property transactions.

15. The attached report is the outcome of that commission. The start of Kroll's engagement was delayed for almost a year, following discussions with external parties, to ensure that its enquiries did not compromise any of the investigations that were then being proposed for the Grenfell Public Inquiry. The timeline for its publication has been further impacted by the reasonable requirement to consult, for matters of accuracy, with those individuals named in the report itself.

Kroll's core findings

16. The Executive Summary of the report outlines the core findings, but the full report needs to be read to gain a broader sense of the detailed investigation that was undertaken by Kroll. The report examines the *Corporate Property Strategy* that was in place at the time of the key transactions, as well as the independently authored (by King Sturge) report that led to these properties being declared to surplus to operational requirements.

17. The report concludes that formal options appraisals were undertaken, albeit that one was concluded retrospectively - *"Kroll's analysis concluded that there was consideration of various options in relation to each of the Transactions. One example was identified when an options appraisal was conducted after the decisions had already been approved, but these broadly supported the context and rationale for the decision."* (Para 3.10)

18. The report also concludes that, "*with regards to scrutiny of decision making, the Review identified some weaknesses around the process which meant that at times the scrutiny committees were not able to provide useful, timely scrutiny."* (Para 3.10)

19. The report does not find evidence that the transactions concerned were evaluated with regard to 'best value' - rather that the decisions that authorised the transactions were based principally on commercial criteria - i.e. by securing 'best consideration'. The Kroll report states that there was "*evidence that the transactions were in good faith and founded on the overall intention to maintain the provision of front line services to benefit all parts of the community. The Review did not identify any specific mention or consideration of "Best Value" in the relevant Cabinet Decision Reports, although there was consideration of maintaining or improving service provision*". (Para 3.10)

20. The report refers to an independent QC's legal opinion,[ii] submitted to the Council on 26 February 2014, specifically stating that according to the body of case law on Section 123, best consideration was primarily demonstrated by the commercial value. The QC allowed that some additional factors could be included in the calculation of best consideration, for example the retention of legal rights in the property, but was clear that, "these additional factors must have a quantifiable commercial value and that this did not include elements of

purely social value." This is correct. But more generally, it is our view that there is widespread confusion about 'best value'.

21. Best value is an overarching responsibility for local authorities as well as police and fire authorities. It encompasses broad purposes and relies upon relevant authorities balancing a range of factors in making their decisions. It is not confined to the responsibility for pursuing 'best consideration' in the sale or lease of an asset. Instead it is a first order responsibility for ensuring that a broad range of matters are drawn into consideration. Midway through the time period over which these transactions occurred, the Government issued revised statutory guidance on best value in March 2015, which explicitly encourages authorities to involve and collaborate more with local voluntary and community organisations.[iii]

22. In addressing the issue of whether community impact or community benefits were evaluated as part of the decisions about these property transactions, Kroll report that the former Director of Corporate Property and the then leading Members were clear that financial considerations were the primary drivers in the decision making process, along with the objective to more efficiently utilise council buildings. And so the social, equality and community considerations were not given the prominent attention that the Council would pay to these matters now. Detailed property matters were considered - this was not evaluated on a simple cash calculation. In relation to the demonstration of best consideration in respect of the Isaac Newton Centre in 2014, for example, "*the Corporate Property Department's assessment in January was based on financial criteria including covenant strength, rent level at several intervals, rent-free period, and rent-review percentages and conditions*".[iv] (Para 7.1.6.1)

23. By 2014, the Council had achieved some £9.2m per annum income from its property portfolio. At the time, senior officers advised that the target for raising income from property and achieving savings, could be raised to £20m per annum. (Para 4.4.1)

24. Of course by 2014, the Council's property and asset management function had been reorganised so as to create a small team to act as a client to the large facilities management contract, for the Tri-Borough, that had been awarded to Amey. The scale, complications and cost of this contract, undoubtedly drew disproportionate management attention to facilities management issues across three Councils during the contract period. However, the remainder of the corporate property management functions in each borough were retained as having a single borough focus.

25. Finally, Kroll were concerned to attempt to understand the 'cultural dynamic' operating at the Council at the time. The report is however, cautious in reaching firm conclusions as its authors were investigating just four property transactions. However, the report concludes that, "*the culture of attempting*

to achieve best consideration and make the best use of the asset base was ultimately driven by the Strategy and the context surrounding the funding difficulties which the Council was under. There were, however, some community groups who felt that their voices were not heard." (Para 3.10)

26. It is plain from the report that the Council's current approach of starting from community perspectives and ambitions is far removed from the financially narrow focus that dominated in the years to 2017. This significant change of emphasis is one of the central legacies of the Grenfell tragedy: it re-oriented the Council from top to bottom. Investment in public and community infrastructure is now one of the key ways that the Council currently seeks to achieve public betterment locally.

A changing context

27. The Council has greatly adapted its policy stance towards these issues since learning the tragic lessons of the Grenfell Tower fire. Not only does the Council give primacy to community considerations in all of its work, it has also decided to place its public and community assets at the centre of a "social investment" approach which aims to leverage value for common good or community benefit and not simply to seek "best consideration" in respect of its property and asset portfolio. The Council is set to follow a path which balances our duties to consider 'best value', 'social value' in service commissioning,[v] and community benefit alongside the Council's service and financial imperatives as well as its other functional responsibilities.[vi] It is intended that a report be presented to the Leadership team in May about the emerging Social Investment approach.

28. Nonetheless, it is vital that, as an organisation, we learn from our history and the changing context in which we operate. The period from 2010 established new orthodoxies in local government as the then government's approach to fiscal consolidation lead to substantial reductions in central government (or national taxpayer financed) support for local government. In the period from 2010 to 2017, Councils' "core spending power" (the combined revenue gained from local Council Tax and government funding) was dramatically reduced.[vii] Across London, the "spending power" of Councils was reduced by an average of 32%. Most this reduction occurred in the first half of the 2010s. Indeed, in the last two years, spending was budgeted to have risen modestly since its nadir in 2017–18, as business rates revenues, council tax rises and ring-fenced funding for social care have offset continued cuts to general-purpose grants from central government.[viii]

29. In Kensington & Chelsea, the Council's overall spending power was reduced by 36% over the 2010-2017 period; higher than the London average. However, the Council sustained its spending on children's social care (actually increasing it marginally, by 3%); albeit that in other service areas, spending was reduced

substantially. In adult social care it reduced by 24%; in non-schools education by 54%; and in all other services (planning, culture, environment, etc) by 47%.

30. This approach was not unique in Kensington and Chelsea; similar protections were applied, to the budgets of child safeguarding and early years services, as well as to some adult social care services, by most other Councils. However, locally there can be little doubt that the strong policy stance towards completely protecting the budgets of early years and child safeguarding services, together with the quality and strength of professional practice in these services, was the main reasons why the services have continually been judged as outstanding by OFSTED.

31. In 2010, some 42% of the Council's spending was on children's and adult social care. By 2017 this had risen to 54%. By the end of the decade (2020) it is some 60% of all net revenue spending.[ix] This inevitably squeezes expenditure on general public services for communities and residents locally. Broadly 60% of all local government net spending is directed at an average of 3% of Councils' resident populations (those in need of children and adult social care). Therefore, the "austerity" measures that hit local government finances during this period, resulted in Councils disproportionately focussing their savings on general services to the community, such as libraries, refuse collection, planning, environmental, and cultural services.[x]

32. Locally, this was also a period when the Council achieved savings by combining large areas of its service functions alongside Westminster Council as well Hammersmith & Fulham. Initially from 2011 this was in the shared services and shared management arrangements of the Tri-Borough; subsequently it has continued across the Bi-Borough with just Westminster.

33. Councils were encouraged to gain additional income from other sources - some pursued strategies of trying to sell services to other Councils. But mostly they sought to increase fees and charges to service users, as well as gain increased lease and rental income from commercial properties already in their ownership. Mostly, authorities examined their property holdings in order to rationalise their asset base, so as to lower their costs. One option open to Councils, was to sell unused or under-used assets, either to reduce their borrowing or to gain capital receipts so as to support their capital programmes.

34. Few Councils, beyond those in Central London, had a large and valuable asset base that could be converted into long term rental income streams of sufficient scale. But this Council was one of them. In the early part of this period the Council collected about £10m in rental income from commercial properties. This current year it budgeted to collect some £16m in rental income (nearly 11% of all net revenues). Of all London authorities, only Westminster budgets to collect a greater share of its net revenues from commercial rental income. The average across London is for Councils to gain about 2% of all their

revenues from commercial rental income. Those other boroughs budgeting to collect a greater share than average includes Camden at 5.7%; Newham, 5.0%; Southwark, 4.9%; and H&F 4.2%.

35. This background context is significant as the four property transactions referred to in the Kroll report between them raised some £4.2m in rental revenues to support the Council's finances - more than most other London authorities collect in total and equivalent to two years of a maximum increase in the Council Tax at the capped level.[xi]

36. However, while the overall resourcing strategy of increasing rental income from property transactions may have been financially sound, it was perhaps too narrowly cast. At the time many authorities were reshaping their property strategies in the light of overall changes in capital programmes, and policy stimulus from Government to rationalise their asset bases alongside other public sector organisations such as the health service.[xii] Councils need approaches that consider the best way to leverage value to local communities through using their asset base prudently and better, prior to considerations of sale or rental.[xiii]

37. What's more, following the 2011 Localism Act, in 2012 the Government introduced regulations to require Councils to respond to community initiatives, by listing "assets of community value" (ACV) so as to prevent their immediate sale and enable communities to have a six month period to finance the purchase of these properties.[xiv] A community asset or space was defined as buildings or land which were used for the well-being or social interest of the local community. These may include parks and open green spaces, libraries, cultural spaces, swimming pools and other leisure facilities, community centres, youth centres, nurseries or public houses.

38. This ACV process enables the option of a "community right to buy" at market price. By requiring communities to finance the purchase, something which is beyond the scope of most community interest groups, in effect this process mostly dampens the market for sales of these types of properties. The Council currently has eight properties listed as assets of community value: these include three public houses, one library; one police station; one College; one sports club and one theatre. Critically, the ACV process applies in respect of proposed sales and to the grant of a lease with vacant possession of 25 years or more. It does not apply to proposed shorter term leases or rentals. Council officers currently work to a clearly drafted planning practice note on ACVs, but it is recommended that this process ought to be reviewed by a group of senior officers.

39. Thus at the time of the four transactions at the centre of the Kroll Report, most Councils were either selling their assets directly; converting them into revenue streams (where there was sufficient demand to meet lease and rental costs);

reshaping their uses, through rationalisation or functional changes; and/or considering their wider utility to the community in the localities in which they were situated by enabling community management or asset transfer. The broad four options open to Councils in respect of unused or under-used property or land was to (1) retain as is; (2) sale; (3) rent; and (4) rationalise or reconfigure the structure the asset (internally within the Council or externally through community management or asset transfer).

40. Looking back to this time, what stands out in central London (and particularly in Kensington and Chelsea) was that the asset price falls that were evident elsewhere in London, and across the rest of England, were not reflected in local asset and property values. Instead, a continued demand for commercial rental property was experienced throughout the borough.

41. This may have led to an overly positive assessment of the future of commercial rental incomes in Kensington and Chelsea. As the Kroll report shows, at one point it was considered by officers that the Council's property holdings could generate some £20m per annum in combined increased income and savings to the Council. In the current year the Council budgets to collect some 10.3% of its net revenue spend from commercial rents. Of course, until the Covid-19 pandemic, this commercial rental income was viewed as a reliable if not universally buoyant income source. The catastrophic events of the past year have witnessed the unravelling of this economic assumption.

Decision making and advice giving

42. The Kroll report investigates in a highly detailed way the process for decision making in Kensington and Chelsea prior to 2017. The report shows that decisions were aligned to the corporate property strategy and that, aside from some detailed shortcomings, on the whole the process met the Council's constitutional expectations. Two main points need to be made here:

    - First, the formal process for decision making has been amended following the Grenfell tragedy and the subsequent 2018 review by the (now) Centre for Governance and Scrutiny. The majority of decisions are made in open committee and are subject to public deliberation, corporate discussion as well as to formal scrutiny from across the Council.

    - Second, it is the Council's statutory and appropriate senior officers who are responsible for the quality of professional advice provided to Members in writing. Members make the decisions, officers advise. Their different roles are clarified in the revised 'Protocol on councillor/officer relations' set out in the Council's Constitution.

43. Effective decision making in local government requires complete and comprehensive professionally based advice giving by officers, and thorough determination by Members on grounds of issue-based reasonableness and

reason generally. Reports need to be objective and impartial, contain relevant information and not raise irrelevant considerations. And, unlike in the civil service, senior local government officers possess constitutional personality in that their advice cannot hide behind the cloak of privilege. There is a limited category of 'exempted information' - which includes legal advice from the Council's own lawyers. But those exemptions aside, advice is open to scrutiny.

44. In a 2019 report the National Audit defined local authority governance as,

> "t*he way in which organisations are directed, controlled and led.*
>
> *It defines relationships and the distribution of rights and responsibilities among those who work with and in the organisation, determines the rules and procedures through which the organisation's objectives are set, and provides the means of attaining those objectives and monitoring performance. Importantly, it defines where accountability lies throughout the organisation."*
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> *Good governance in local authorities ensures that decision-making is lawful, informed by objective advice, transparent, and consultative. It is crucial in achieving value for money and securing financial sustainability. Partly, the controls within governance arrangements are in place to prevent serious failings like poorly informed or unnecessarily risky decisions, fraud or other criminal behaviour, spending public money for personal benefit, or persecution of whistle blowers."*[xv]

45. In achieving any policy objective, there needs to be clarity of policy intent and a thorough appraisal of all possible policy instruments for achieving that intention. Since 2017, the Council has been clear that community considerations come first. And that all aspects of policy, within the control of the local authority, require community involvement from the outset.

46. But across local government more generally, Members are ill-served if they only offered weak appraisals, solutions in search of problems, or simply poor evidence in support of a range of limited options to achieving a policy goal or objective.

47. One common failing amongst Councils is that reports in pursuance of a policy are drafted in service silos without considering wider implications, consequences and ramifications. And despite all of our efforts locally to improve our advice giving it is a criticism that, from time to time, could be reasonably levied now.

48. The important point is that Councils are multi-purpose organisations and Members are elected to generate public betterment locally, and not simply pursue individual service strategies and objectives. This was one of the fundamental lessons that the Council draws from its acknowledged shortcomings and failings in respect of the Grenfell fire tragedy. It is the

reason why it recast its values in 2018 and its overall policy stance in 2019 (in the Council Plan). And it is a critically important lesson of our dealing with the continuing Covid crisis.

49. From time to time, officer reports are too narrowly drafted; the considerations are too narrowly scoped, and the full range of options are insufficiently outlined for Members to determine matters properly. Officers have introduced a process for greater corporate consideration of service-related proposals. But it is recommended that the quality of advice in reports be assured following fresh guidance to be issued by the monitoring officer and the Director of audit, risk, fraud & insurance. This will assure Members of valid, reliable and quality reports.

Background Papers and References

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[i] Kroll (2021) Independent Review of Property Transactions, Report Prepared for Royal Borough of Kensington and Chelsea

[ii] Para 7.1.6.1 of Kroll (2021). For further detail on external legal advice, see section 7.3 in respect of involvement of external advisors.

[iii] DCLG (March 2015) Revised Best Value Statutory Guidance,

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418505/Revised_Best_Value_Statutory_Guidance_final.pdf

[iv] see Kroll report Exhibit 45, Corporate Property Department Isaac Newton Centre Bid Summary, 14 January 2014

[v] Cabinet Office (2014, updated 2016) The Public Services (Social Value) Act came into force on 31 January 2013. It requires people who commission public services to think about how they can also secure wider social, economic and environmental benefits. Before they start the procurement process, commissioners should think about whether the services they are going to buy, or the way they are going to buy them, could secure these benefits for their area or stakeholders.

The Act is a tool to help commissioners get more value for money out of procurement. It also encourages commissioners to talk to their local provider market or community to design better services, often finding new and innovative solutions to difficult problems.

[vi] In addition to best value and social value, the Government also encourage the trialling of their revised ***public value*** framework (2017 updated in 2019) to improve the overall productivity and impact of public service provision.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/785553/public_value_framework_and_supplementary_guidance_web.pdf

[vii] NAO (2018) *The Financial Sustainability of Local Authorities*, all the figures quoted in para 4,5, 6 and 7 stem from the NAO report at: www.nao.org.uk/report/financial-sustainability-of-local-authorities-2018/

This allows for comparisons of K&C spending reductions with other authorities on a consistent basis.

[viii] Harris T *et al* (2019) *English local government funding: trends and challenges in 2019 and beyond*, Institute for Fiscal Studies, www.ifs.org.uk/publications/14563; of course the position has changed dramatically in 2020/21 as a result of the Covid19 crisis.

[ix] In 2019-20 the Council's total net service costs were £152m. Less Grenfell recovery and other related expenditure £12m, produces £140m: of which £41.5m was on adult social care; and £42.1m was on children's services).

www.rbkc.gov.uk/council-tax/what-we-spend

[x] NAO (2018) The Financial Sustainability of Local Authorities

[xi] a 1% increase in Council Tax raises £1.2m in K&C - and the cap has been set at a 1.99% increase for several years now

[xii] The *One Public Estate* programme began in 2013. It performed a distinctive and unique role, catalysing and supporting joint estates planning across public partners in ways not seen in other government-funded land and property initiatives. By 2018 it had expanded from the initial 12 pilot areas to over 300 programmes across England, working with over 90 per cent of Councils in 76 partnerships.

[xiii] DCLG (2008) *Making Assets Work, the Quirk Review of community management and ownership of public assets*

[xiv] The process for nominating and declaring an asset as an 'asset of community value' stems from the 2011 Localism Act. The process is set out here: https://www.legislation.gov.uk/ukpga/2011/20/part/5/chapter/3/enacted

[xv] NAO (2019) *Local Authority Governance,* HC 1865 SESSION 2017–2019 15 JANUARY 2019 https://www.nao.org.uk/wp-content/uploads/2019/01/Local-authority-governance.pdf