

MUNICIPAL YEAR 2018/2019 REPORT NO. **212**

MEETING TITLE AND DATE:

Cabinet – 24 April 2019

REPORT OF:

Executive Director Place

Director of Housing and
Regeneration

Agenda – Part: 1

Item: 5

**Subject: Custom Build Programme in
Enfield – Sites Disposal**

Wards: All

Key Decision No:4613

Cabinet Member consulted:

**Cllr Lemonides – Cabinet Member for
Housing**

Cllr Caliskan – Leader of the Council

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1. EXECUTIVE SUMMARY

- 1.1 The proposed Enfield Custom Build Homes Scheme is a pilot scheme funded by the GLA which enables the development of difficult garage and car parking sites into homes that can be self-finished by local first-time buyers at a market discount.
- 1.2 Through the scheme the Council partners with a non-for-profit developer to assemble and sell land for homes, pending planning obtained by the developer.
- 1.3 An innovative approach to new housing, the scheme will help unlock the opportunity of homeownership to residents who are currently locked out of the market, and that want an active involvement in the design and specification of their home.
- 1.4 This report seeks approval to the disposal of the sites identified for the delivery of the Custom Build Homes Scheme in Enfield. Disposal of these sites was approved in 2016 (KD4200), as part of the Small Sites Housing Programme (KD3920).
- 1.5 A new cabinet approval is required to agree a change from a leasehold model to a full sale model, as a result of a change in government policy since the original model was proposed.

2. RECOMMENDATIONS

- 2.1. The disposal of the sites listed in this report on a freehold basis to Naked House Community Builders (CIC); based on affordable housing site valuations; with appropriate agreements and restrictive covenants to enable affordable custom build development of the sites.
- 2.2. Delegate to the Director of Housing and Regeneration, in consultation with the Cabinet member for Housing, the authority to add or adjust the list of sites for participation in the scheme.
- 2.3. Appropriation of the sites agreed with Naked House for Planning purposes, subject to the Developer entering into an indemnity to cover the Council's costs.
- 2.4. Delegate authority to the Director of Law and Governance to seek the Secretary of State's consent for the disposal of the sites.
- 2.5. Delegate authority to the Director of Housing and Regeneration, in consultation with the Cabinet Member for Housing, to finalise the eligibility policy for Custom Build Homes which aligns with the Council's Draft Intermediate Housing Policy.
- 2.6. Delegate to the Director of Housing and Regeneration, in consultation with the Cabinet Member for Housing; and the Director of Law and Governance, authority to finalise the commercial terms including the final disposal price to enable the disposals to be completed.

3. BACKGROUND

- 3.1 In June 2016, a Cabinet report (KD 4200) approved the original mechanism set out for the delivery of this pilot scheme. The report proposed the use of long leases to enable the Council to receive an income stream from ground rents charged on the leases.
- 3.2 In December 2017, the Government announced its intention to ban ground rents for both flats and houses; and to ban the sale of leasehold houses. The Cabinet is consequently, being asked to dispose of the sites by transferring the freehold to a non-for-profit developer, Naked House Community Builders with the value of the sites restricted to enable the development of affordable housing making the final housing product affordable for purchasers.
- 3.3 The purchaser would in turn buy either a 250-year sub-lease (for a flat) or freehold (for a house), with restrictive covenants from Naked House as detailed in the Heads of Terms, attached at appendix 1, in Part 2.

- 3.4 The structure of the transaction is as detailed in the Heads of Terms (appendix 1, Part 2).
- 3.5 Naked House shall sell completed units to Enfield residents and people working in Enfield in accordance with the Council's Draft Intermediate Housing Policy.
- 3.6 In the main Naked House will build houses, but there will be a small number of flats if viable on one of the sites; in a range of 1-3 beds units.

Wider Planning and Political Context

- 3.7 The Self-build and Custom Housebuilding Act 2015 placed a requirement on local authorities to keep a register of individuals and associations who are seeking to acquire serviced plots of land in the authority's area.¹
- 3.8 The Housing and Planning Act 2016 introduced the 'Right to Build' with effect from 31 October 2016. From 1 April 2016, Local Authorities in England are required to keep a register of aspiring self and custom-build developers to help Councils plan for future housing and land use.

Local Context - Increasing housing supply on Council owned land

- 3.9 Enfield's 2018 corporate plan sets out a goal to increase the supply of affordable housing in the borough.
- 3.10 Officers have been exploring means of bringing forward housing development to boost the supply of homes on some of the smaller sites in the borough, that have been declared surplus assets, without Council investment, or having to increase the in-house resource.
- 3.11 The Council has also joined the GLA funded Local Self Build Register, a pan-London register that has been set up to support the process of communication between self-builders and local authorities, so that accurate data on self-build demand can feed into local policies and projects. As of 31st October 2017, there were 210 individuals and 4 groups on the Council's Custom Build and Self-Build register.
- 3.12 KD 4200 approved a recommended strategy and mechanism for enabling the development of affordable custom build & self-build housing in Enfield on smaller scale Council owned sites. In taking a proactive role, the Council sets an example to other public landowners in bringing forward underutilised land to increase the supply of new housing while increasing the diversity of housing products.

Local Context Building Affordable Homes for Local Residents

¹ A 'serviced plot of land' means a plot that has access to a public highway and connections for electricity, water and waste water

- 3.13 Custom build is an additional source of new housing supply which can provide attractive, good quality and affordable housing.
- 3.14 A large proportion of young people in London are locked out of home ownership due to an affordability crisis, while there is also a niche market for a housing product which allows greater flexibility for residents in determining the internal layout and specification. The custom build product is a more affordable, bespoke home ownership product aimed at first time buyers.
- 3.15 The proposed Enfield custom build scheme is developer-led with self-finishing options given to the purchaser. Rather than the much more internally specified living spaces that are provided in most new build developments, this more basic product will drive down costs for prospective homeowners and give residents far greater choice and creative freedom, in the internal fit out and specification of their home, which they can do in their own time, as and when they can afford it.
- 3.16 Furthermore, the homes will be sold at a discount to a market price and be affordable to local residents to purchase. The scheme aims to sell the homes at approximately 70% of market value, so that buyers will pay no more than one third of their household income on the mortgage.
- 3.17 This will be enshrined in the Project Agreement and Land Covenant as already is in Naked House's funding agreement with the GLA. Table 1 shows a worked example on affordability for a 1 – 2 bed property. A couple with a combined income of £60k can afford a 3-bed property at a discounted price of £310,000 representing 70% of the open market value.

Table 1. Indicative worked examples on affordability

Unit size	Unit Open Market Value	Naked House Discounted Sale Price	Sale Price as % of OMV	Target Salary Range	Housing costs as a % of Gross Salary
58 SQM N21	£ 287,000	£ 225,000	78%	£36,000 - £45,000	29%
58 SQM EN3	£ 260,000	£ 206,000	79%	£35,000 - £40,000	29%

Selection of Naked House

- 3.18 The partnership between Enfield Council and Naked House began in 2015, when Naked House was approached by LBE officials to collaborate on a joint entry between Enfield Council, Naked House Community Builders (CIC), and Pitman Tozer Architects into the New London Architecture National Competition in October 2015.
- 3.19 Naked House was selected by the GLA for the delivery of Custom Build homes in Enfield based on their submission 'Making More with Less: Unlocking Leftover Land for Generation Rent', which was named as one of ten winners; and their subsequent proposal, presented to the GLA at City Hall on 30th November 2015.
- 3.20 The GLA also supported Naked House with funding agreed in principle.

- 3.21 Because of the strong GLA support, Naked House was placed in the unique position of being the only organisation that could deliver this pilot scheme. There are currently no other providers and funders in the market for this pilot scheme.
- 3.22 The sites under consideration are currently held within the HRA. The legal implications of the transaction with Naked House is provided at paragraph 6.2.

Structure of the Transaction

- 3.23 The finalisation of the Heads of Terms for the Project Agreement in respect of the first tranche (Numbers 1 – 6 in Table 2) of the Freehold disposal terms are being asked to be delegated to Director of Housing and Regeneration, in consultation with the Cabinet Member for Housing; and the Director of Law and Governance.
- 3.24 Each site and the nature of the development will be considered on its merits. A draft Heads of Terms is attached at Appendix 1 (part 2).

Site Values

- 3.25 The Council's External Valuers "Savills" have been instructed to carry out valuations for the sites and their indicative valuations for each of the sites are set out at Appendix 1(part 2). The proposal is to dispose of the sites based on affordable housing site values. For the purposes of comparison, they have also produced open market site values assuming the sites were to be disposed of for private housing rather than affordable housing.
- 3.26 Savills will carry out a further final valuation on the basis of affordable housing site values on the date the planning permission is granted, and the relevant judicial review period expired (the **Valuation Date**), taking into account discount sale values and targeted local incomes. The consideration to be payable within 10 working days of the earlier of the sale of the last completed unit upon the relevant site or by the long stop date of the Project Agreement (i.e. 4 years), whichever is earlier.
- 3.27 The proposal is that the parties enter into an Agreement which is conditional on funding, planning, title, land appropriation and vacant possession at nil consideration. Naked House will draw down an adequate number of sites (up to a maximum of 7 sites for the first tranche), to enable them to deliver the required minimum of 22 units (a condition attached to their GLA grant); subject to satisfaction of the conditions.
- 3.28 Once a site has been selected for draw down and the conditions have been satisfied within a 2-year period (subject to a long stop date extendable in the event of delays in the planning and design process) the Council will transfer the Freehold to Naked House. The Council may terminate the Project Agreement at any time if Naked House either becomes insolvent or commit a substantial

breach of the Project Agreement obligations which either cannot be rectified or is not rectified within a reasonable time following notice from the Council.

- 3.29 The terms are subject to contract, and other Council approvals, sites being agreed with Naked House and subject to advice on best consideration and state aid.

Proposed sites to be developed and criteria for further sites

- 3.30 KD 4200 identified and authorised the inclusion of a number of sites. The report identified that there were many smaller scale sites particularly in the east of the borough which due to their relative size and the associated costs/benefits in developing them, are not economical for the Council to deliver through the Small Housing Sites Programme;² and in any case would not be an efficient use of resources due to the level of work involved or financial constraints.
- 3.31 Table 2 below list the sites identified for disposal under the custom build scheme, as approved by KD4200.

Table 2: Schedule of initial sites for Custom Build (subject to due diligence & feasibility).		
	Site Address	Postcode
1	Ingersoll Road Garages (1-16)	EN3 5PU
2	Clarence Road Garages (73-107) and land.	EN3 4BL
3	Kennedy Avenue Garages (1-20)	N3 4PB
4	The Brightside Garages & Car Park (former Garages 1-14, and Garages 14-19)	EN3 5DY
5	Berkeley Gardens Garages (1-23)	N21 2PD
6	Bowood Road Garages (1-22)	EN3 7LL
7	The Sunny Road Garages (1-7)	EN3 5EF
8	Ordnance Road Garages (1-26)	EN3 6BN
9	Raynton Road Garages (1-14)	EN3 6BP

² The small housing sites programme is a pipeline of sites mainly dilapidated and underused garages and car parks; and infill sites, on HRA land which have the potential for contributing to the housing supply with the aim of maximising affordable housing across the programme through cross subsidy from private sale homes. The sites are being delivered in phases/tranches to take into account resource constraints.

10	Ferndale Road Garages	EN3 6DH
11	Ramney Drive Garages	EN3 6DU
12	Ashton Road Garages (26-30)	EN3 6DG
13	Land at Redlands Road & Leys Road West	EN3 5HW
14	Chiltern Dene Garages (1-10)	EN2 7HH
15	Stoneleigh Avenue Garages (10-11)	EN1 4HU
16	Ingersoll Road Garages (1-16)	EN3 5PU

3.38 Further due diligence will be undertaken by the Developer on these sites and any subsequent sites that are identified and included in the programme. The majority of the sites that are proposed to be included are garage sites which the Council owns and is able to terminate license agreements to ensure vacant possession.³

Project Agreement

3.39 The Developer will initially sign the Project Agreement. Under the Project Agreement the transfer of the freehold of the land will be conditional on funding, planning and title, land appropriation and vacant possession. The Council's role will be to assist with land appropriation and obtaining vacant possession but not funding or planning or development costs.

3.40 The Developer would take on the role of managing the registers/eligibility and assisting the persons and groups with all of the planning, design and development work and liaison with prospective custom build homeowners through to completion of the homes.

3.41 The costs of professional fees and engagement will be met by the Developer and individuals and groups that take up the offer of a custom-build opportunity. The scheme presents the Council with minimal financial obligation.

3.42 The Council however will need to use its powers to facilitate the development of these sites, for example where there are access rights, restrictive covenants or parcels of unregistered land, by the appropriation of the land.

3.43 The performance of the Developer and the project will be carefully monitored by the Council, working closely with the GLA, who are the main Lender on the project.

Eligibility for custom-build homes

³ 16 sites have listed on the table for ease of swapping where third party issues cannot be resolved or are too expensive to resolve.

- 3.44 A draft eligibility and selection criteria that prioritises Enfield residents and people working in Enfield has been developed. This report is asking Cabinet to delegate authority to the Director of Housing and Regeneration, in consultation with the Cabinet Member for Housing, to finalise the eligibility policy for Custom Build Homes which aligns with the Council's Intermediate Housing Strategy.

4. ALTERNATIVE OPTIONS CONSIDERED

Do nothing

- 4.1. This option has been considered and discounted. It is now a legal requirement to maintain a register for custom build and self-build opportunities. There is currently a demand for self-build and custom build housing with over 200 applicants on the register as at September 2018. This scheme offers the Council and interested residents a genuine alternative affordable housing product.
- 4.2. Furthermore, the Council can no longer retain or maintain these underutilised and untidy garage sites in the Borough.

Disposal of the sites at full market value on the open market

- 4.3. This option has been considered. The Council's External Registered Valuers have estimated the likely market value of the capital receipts from disposal of these sites. Whilst the value of the capital receipts is reasonable for private housing, it will not deliver the Council's custom build affordable housing objectives for these sites.

Direct Development of the sites for new housing by the Council

- 4.4. Council as direct developer of these sites has been considered. However, given the relative level of risk and return on investment for these sites, they are not considered to be economically viable considering the number of other sites which are coming forward as part of Phase 2 of Small Housing Sites Programme.

Work with Housing Gateway or Enfield Innovations to deliver the scheme

- 4.5. This option was considered but it was identified that both organisations do not have the expertise for delivering affordable custom build homes. The rationale for the option recommended is to provide an affordable new build housing offer at discounted market sale; to increase the diversity of housing products available and to deliver an option that had strong GLA support. Naked House was selected by the GLA and comes with in principle GLA funding and support.

Bring the sites back into use as garages or parking areas

- 4.6. This option has been considered and discounted given the acute need for additional affordable homes in the borough. Also, the refurbishment or new build of garages; or the creation of parking areas will not bring sufficient income to the Council.

5. REASONS FOR RECOMMENDATIONS

- 5.1 To meet the requirements of the National Planning Policy Framework which requires local authorities to identify suitable opportunities for both custom build and self-build.
- 5.2 To meet the requirements of the Housing and Planning Act 2016 which introduced the 'Right to Build' with effect from 31 October 2016.
- 5.3 As mentioned in paragraph 3.14, a large proportion of young people in the borough are locked out of home ownership due to an affordability crisis. In addition, there is a niche market for a housing product which allows greater flexibility for residents in determining the internal layout and specification of their homes.
- 5.4 The proposed scheme will provide additional affordable home. It will help unlock the opportunity of homeownership to residents which are currently locked out of the market, and a demographic that wants an active involvement in the design and specification of their home.
- 5.5 The scheme has the potential to support local employment; contribute to skills development for the custom build homeowners; increase the diversity of housing products available; with minimal financial costs to the Council.
- 5.6 Above all, the scheme will deliver the most efficient use of the identified sites, representing best value and;
- 5.7 has a strong GLA support who are the main funders.

Indicative Timeline

Event	Indicative date
Cabinet Approval	April 2019
Sign Project Agreement	July 2019
Due Diligence and Land Transaction	September 2019

6. COMMENTS FROM OTHER DEPARTMENTS

6.1 Financial Implications

See Part 2

6.2 Legal Implications

- 6.2.1 The Self-build and Custom Housebuilding Act places a duty on certain public authorities (including London Boroughs) to keep registers of individuals and associations of individuals who wish to acquire serviced plots of land in order to bring forward self-build and custom housebuilding projects. A “serviced” plot of land in this context means one which will satisfy specified requirements about utilities and other matters. Councils must publicise the registers and have regard to them in carrying out their planning and other functions and when disposing of any land.
- 6.2.2 Where the Council procures works, supplies or services in connection with the proposals contained in this Report (for example, the selection of the Developer), it must comply with UK/EU procurement legislation where applicable, and the Council’s Contract Procedure Rules. On the face of it, the contracts to be entered into by the Council will be freeholds, which are interests in land, and should therefore, fall outside the Procurement Regulations 2015 (“the Regulations”), provided that there is no positive obligation on the developer to build out. The final transfers which are developed from the broad Heads of Terms, must maintain the ability to fall into the category of ‘interests in land’ under the Regulations, and it would be prudent therefore to check this is still so when the final draft of the transfers are produced.
- 6.2.3 When compiling and operating the registers, the Council must be guided in all its actions by the principles of equal treatment, transparency and non-discrimination - which in the event of any challenge to its admissions to the register, and/or operation of the register, should then enable it to present a suitable defence to any such challenge. In addition, all legal agreements must be in a form approved by the Director of Law and Governance.
- 6.2.4 The Council has powers to appropriate land for planning purposes if the land is no longer required for the purpose for which it is currently held. In reaching this decision, the Council must consider the public need within the area for the existing use. In this instance, the land is currently held for housing purposes but is now required for development for planning purposes.
- 6.2.5 Section 203 of the Housing and Planning Act 2016 allows works to be carried out on land appropriated for planning purposes as long as those works are in accordance with planning permission, even though those works may interfere with an interest or right affecting the land or involve a breach of a restriction on the use of the land. Compensation is payable where loss is suffered as a result of interference with any such rights.
- 6.2.6 Section 233 Town and Country Planning Act 1990 requires land which has been appropriated for planning purposes to be sold with consideration which is the best to be reasonably obtained. Otherwise consent of the Secretary of State is required. The covering circular to the LGA general consent at paragraph 13 makes it clear that the general consent does not extend to disposals of land under section 233 and therefore it will be necessary to approach the Secretary of State in order to obtain an individual consent. Given the enthusiasm for improving the supply of housing in London, this should not be problematic.

6.3 Property Implications

- 6.3.1 The Council will need to obtain statutory consent for disposal and also appropriate the sites in order to mitigate third-party issues and reduce the risk of not being able to develop on the sites.
- 6.3.2 The proposal to dispose of the sites is to be tied to a planning consent that will determine the proposed size and tenure mix to be delivered on each of the sites for “affordable custom build housing”. A re-valuation of the sites will be carried on the date the planning permission is granted.
- 6.3.3 The proposal will enable the delivery of the affordable custom housing units by way of a freehold disposal to Naked House Community Builders (CIC), on the basis of covenants that ensure they remain as affordable housing.
- 6.3.4 In order to ensure that the units developed on the sites are affordable, and remain affordable housing, covenants to this effect will be included in the sale. Consequently, the affordable housing site disposals values are estimated to be in the region of 40% to 60% below the market value compared to the open market values, as advised by the External Registered Valuers (Savills), subject to their final valuation report, and capital receipts will not be receivable until the units are sold to purchasers.
- 6.3.5 To ensure delivery of the custom build affordable housing element a Project Agreement will need to be completed with the developer before transfer of the sites. Performance of the developer will be carefully monitored under the agreement.

7. KEY RISKS

Key Risk	Action to Mitigate
Risk of project failure	<p>Naked House has qualified and experienced staff with the ability to manage the proposed scheme. Key persons to the success of the project include:</p> <ul style="list-style-type: none"> • Two full-time Directors to oversee the scheme • One full time Project Manager • Naked House has contracted independent consultants with high level expertise to conduct other aspects of the project including: • An Employers Agent to manage the contract with the chosen contractor and to undertake QS and clerk of works roles • A team of legal, Finance, Risk Management and Business advisors <p>There will be funder step-in rights in the event of default. The freehold transfer of each Site will contain buy back provisions in favour of the Council giving the Council the right (subject to funder step-in rights) to require Naked House to transfer the freehold back to the Council at nil consideration if a) Naked</p>

	House has not commenced works on site within 6 months following completion of the transfer or b) construct the units within 2 years of completion of the transfer, subject to extension. The buy back rights will fall away once the units upon each Site reach practical completion and the Council has been provided with a practical completion certificate in respect of the same.
Risk to Council Asset	Under the proposed Heads of Terms, the Council will only transfer the freehold interest in each Site to Naked House when all the conditions under the Project Agreement, applicable to that Site have been satisfied. Each Site transfer will include a restrictive covenant to use the land only for the provision of affordable housing and associated ancillary uses.
Site Risk	Naked House will carry out site surveys, ground reports, environmental reports and similar items; and if a site is discovered to be contaminated, the consideration agreed upon will be adjusted to take into account the cost of decontaminating the site. The Council will use reasonable endeavours to satisfy the vacant possession/land appropriation condition for each Site.
Market Risk	The scheme is about providing housing for local people. It is led by demand rather than profit. The Council already has 210 individuals and groups on its Custom and Self Build Register. The target market is already available and growing.
Finance Risk	The GLA Finance department and housing and land team have reviewed Naked House's model, accounts and business plan. They have assessed their financial commercial standing, in order for them to become a GLA Investment Partner and are satisfied that the funding is appropriate. The GLA are the majority funder for this project and are confident that the funding package put in place with the other lenders will complement the freehold arrangements between Naked House and LBE to ensure the project is delivered.
Planning Risk	Under the Project Agreement, the transfer of the freehold of each Site will be conditional on funding, planning and title, land appropriation and vacant possession.
Project Agreement Management Risk	The contract with the developer will include robust performance management arrangements to ensure that the development is delivered according to the agreed standards and timescales. LBE officers will manage the Project Agreement through monthly performance management meetings with Naked House.

8. IMPACT ON COUNCIL PRIORITIES – CREATING A LIFETIME OF OPPORTUNITIES IN ENFIELD

8.1 Good homes in well-connected neighbourhoods

The Council's Housing vision is to increase the supply of well-managed, good quality and affordable homes; promote housing choices; and build strong neighbourhoods. Housing continues to be both a great cause and manifestation of inequality as London is gripped by an affordability crisis. Enabling the development of otherwise redundant or underutilised sites and putting in place a process to enable development for custom and self-build households at discounted market sale can help unlock the opportunity of homeownership to a demographic which is currently locked out of the market, and a demographic that wants an active involvement in the design and specification of their home as aforementioned.

8.2 Sustain strong and healthy communities

The proposal seeks to listen to the needs of people who want to have more control in the design and specification of their new custom build homes. The capacity to bring some diversity to the design, delivery, governance and ongoing stewardship of a place, is increased, contributing to a stronger community

8.3 Build our local economy to create a thriving place

The proposal seeks to bring economic improvement to underutilised sites in the borough, which can generate revenue for the Council, while providing employment opportunities during construction. In terms of creating a thriving place, custom build and self-finishing projects can benefit sustainable development due to the capacity of 'early adopters' to build new intentional communities that puts social and environmental values at the heart of the project. Through self-finishing, there is the capacity of these 'early adopters' to bring about a critical mass of sustainable behaviours and patterns of consumption to achieve lifestyles with lower environmental impact, thus creating a thriving community.

9. EQUALITIES IMPACT IMPLICATIONS

Corporate advice has been sought in regard to equalities and an agreement has been reached that an equalities impact assessment is neither relevant nor proportionate for the approval of this report on Site Disposal. However, it should be noted that projects or work stream deriving from this may be subject to a separate Equalities Impact Assessment i.e. the allocations process of the new homes. Therefore, any projects or work stream will be assessed independently on its need to undertake an EQIA to ensure that the council meets the Public Sector Duty of the Equality Act 2010.

10. PERFORMANCE AND DATA IMPLICATIONS

The contract with the developer includes robust performance management arrangements to ensure that the development is delivered according to the agreed standards and timescales.

11. HEALTH AND SAFETY IMPLICATIONS

The Council through its development partner will ensure that the development of the sites, in particular construction work is carried out in compliance with the relevant Health and Safety and CDM regulations.

12. HR IMPLICATIONS

There are no notable HR implications arising from this report.

13. PUBLIC HEALTH IMPLICATIONS

Housing is a fundamental determinant of health. Good quality homes are associated with higher life expectancies and better health. All of the homes will be designed, and the developer will work with the homeowners to ensure compliance with Building Regulations.

Background Papers:

Cabinet Report – KD 4200 (previously published)

Cabinet Report – KD 3920 (previously published)

Appendices:

Appendix 1 – Summary of Naked House’s Offer & Heads of Terms (attached in Part 2)