

GREATER LONDON AUTHORITY

REQUEST FOR DIRECTOR DECISION – DD2450

Title: Royal Docks Activation Programme 2020/21

Executive Summary:

MD2338 approved expenditure of up to £212.5million for the five-year Royal Docks Enterprise Zone Delivery Plan to deliver an integrated and catalytic package of projects under the five strategic objectives of Place, Connectivity, Economy, Activation and Promotion. A budget of £20.3million is allocated to Activation. That MD delegated authority to the Executive Director of Housing and Land to approve through Director's Decisions, the income and detailed spending proposals for each project that is to be funded within this initial £212.5million expenditure budget envelope.

This Director's Decision requests approval of up to £1,436,000 of revenue expenditure to deliver the Royal Docks Activation Programme for 2020/21, delivering on the Activation strategic objectives set out in the Royal Docks Enterprise Zone Delivery Plan. These projects support the local community and the area's transformation, helping to establish the Royal Docks as a new cultural destination and creative industries cluster.

In accordance with London Economic Action Partnership (LEAP) governance and funding responsibilities for all Royal Docks Enterprise Zone projects, the investment set out in this Decision request was considered and endorsed by the Royal Docks Enterprise Zone Programme Board on 17 December 2019.

Decision:

That the Executive Director of Housing and Land approves:

- 1) Up to £1,436,000 of revenue expenditure from the £20.3million approved Activation budget to deliver the 2020/21 Royal Docks Activation Programme;
- 2) Delegation of authority to the Assistant Director - Strategic Projects and Property to approve future movement of budgets (up to £50,000 per project without requiring a further Decisions Form) between projects within the Activation Programme; and
- 3) A delegation to the Assistant Director - Strategic Projects and Property (to be exercised without the need for a further Decisions Form) to receive and spend sponsorship, funding and other income, from suitable partners, up to a maximum of £150,000 in total which will be used to enhance the development and delivery of the Activation Programme 2020/21.

AUTHORISING DIRECTOR

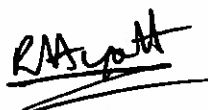
I have reviewed the request and am satisfied it is correct and consistent with the Mayor's plans and priorities.

It has my approval.

Name: Rickardo Hyatt

Position: Interim Deputy Executive Director
Housing and Land

Signature:



Date: 02 March 2020

PART I - NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1. Introduction and background

- 1.1 The Royal Docks is one of London's most distinctive economic locations and largest regeneration projects, with the potential to generate 35,000 jobs and 4,000 new homes over the next 20 years. The Mayor of London and the Mayor of Newham are jointly leading the regeneration of the area through its Enterprise Zone status, which is funded through the ringfencing of business rate income collected within the Zone. The Enterprise Zone is projected to deliver over 7 million square feet of commercial space, primarily at three key development sites – Royal Albert Dock, Silvertown Quays and Albert Island.
- 1.2 The LEAP Board endorsed the Royal Docks Enterprise Zone Delivery Plan in June 2018. MD2338 approved expenditure of up to £212.5million for the Royal Docks Enterprise Zone Delivery Plan to deliver an integrated and catalytic package of transport infrastructure, connectivity, economic development, placemaking, estate management and creative programming resulting in the cohesive transformation of the Royal Docks and the accelerated delivery of commercial space.
- 1.3 The Economic Purpose of the area is outlined in the Royal Docks Economic Purpose Report, jointly commissioned by LB Newham and the Royal Docks Team in 2019 and defined as: "A nationally significant hub of enterprise, employment and culture, recognised as a testbed for social, environmental and technological innovation. Globally fluent and internationally focussed, harnessing the benefits and Newham's diverse community." This definition takes into account the need for the Royal Docks to create jobs in a distinctive way, recognises the wider need to include environmental and social issues in the making of economic decisions, and captures the potential for the Docks to be a home for international business and culture.
- 1.4 The Mayor of London has identified culture as a key priority for London. Culture has a vital role to play in enabling Londoners to come together and forge a sense of belonging, generating civic pride. London's creative sector generates £52 billion a year for the economy and accounts for one in six jobs in the capital, with jobs in the creative sector growing faster than in the economy as a whole. These are the jobs of the future for today's young Londoners. The Mayor of London is committed to ensuring that more Londoners can access the positive benefits that taking part in arts and culture brings and that London retains its status as a world-leading capital for culture and creativity.
- 1.5 The Royal Docks Enterprise Zone Delivery Plan recognises the importance of culture in shaping a place and is underpinned by five cross-cutting strategic objectives to help drive and deliver the transformation of the Royal Docks. These key work strands are Place, Connectivity, Economy, Activation and Promotion. The Activation objectives outlined in the Delivery Plan are to:
 - create lively, attractive and cohesive neighbourhoods animated by a cultural offer;
 - engage local communities in their changing place via a cultural programme;
 - increase visitor and local footfall through consistent and varied programming;
 - position the Royal Docks on the world stage as a distinct location for unique, ambitious events;
 - maximise cultural programming opportunities and impact through local partnerships.
- 1.6 MD2338 approved a budget envelope of £20.3million for Activation to invest in and deliver an ambitious, high quality and sustainable cultural and events programme over the five-year delivery period. The request for expenditure of £1,436,000 revenue, the subject of this decision, will come

out of the Activation budget set in MD2338. This expenditure will be incurred in the 2020/21 financial year.

The 2020/21 Activation Programme

- 1.7 In 2019, the Royal Docks Team commissioned a Cultural Placemaking Strategy which is currently in development and due to be published in autumn 2020. The strategy identifies the potential for the Royal Docks to be an engine room powering London's creative economy by delivering across three core pillars: **Platform, People and Programme**.
- 1.8 The interventions recommended under each of the pillars below are immediate priorities for investment in 2020/21. These include a range of projects which build on the success of the programme to date, respond to the local partnerships already developed and support the wider Royal Docks delivery programme objectives.

PLATFORM – supporting cultural infrastructure, local heritage, meanwhile space, public realm and water landscape

- 1.9 This pillar will help to strengthen local cultural infrastructure – the cultural spaces and facilities needed for culture to thrive – and open existing Royal Docks assets for cultural use. There are few local amenities for culture and leisure in the Royal Docks – it has no leisure centre, swimming pool, gallery, theatre or cinema. To address this, the Royal Docks Team is working closely with local people and organisations to find new, flexible ways to use existing assets.

Royal Victoria Infrastructure – Summer Lido

- 1.10 The Royal Docks Team is trialling new amenities, for example, creating a temporary lido swimming facility for local residents and visitors during the summer. This project successfully engaged over 80,000 people cumulatively in 2019 and 2018. The primary beneficiaries were local families, young people and children. This year, the project will offer free swimming lessons for young people during the summer holidays, supporting the Mayor's Sports Strategy in getting more Londoners engaged with physical activity. With one in four of Newham's Year 6 pupils considered obese and child obesity rates in Newham the third highest in the capital, this amenity provides a much needed and attractive opportunity for physical activity. This project will be funded through the ringfenced Enterprise Zone business rate income. This project will be commissioned via the TfL Events Framework.

Facilities Management Resource

- 1.11 The Royal Docks Team will open up a range of indoor and outdoor spaces at The Crystal and Royal Victoria Dock to animate the area and pilot potential future uses. The team will also enable local groups and creative practitioners to use a range of Royal Docks assets, including meanwhile sites created through development and parks by bringing in some additional capacity and events-specific expertise to manage access to these spaces. The Royal Docks Team will fund this additional capacity and events-specific expertise in the facilities management resource provided by the GLA Land and Property Ltd (GLAP) contractor in order to increase the use of Royal Docks assets. The GLA will vary the existing facilities management contract to include this additional capacity.

PEOPLE – local community engagement and skills development

- 1.12 This pillar will provide creative opportunities for local people, improving cultural engagement levels and supporting creative practitioners in the Royal Docks. The 2020/21 Activation Programme will provide a range of ways for local communities to help influence and engage with the area's transformation and will be informed by the community and existing local assets.

Join the Docks Festival

- 1.13 The Royal Docks Team will continue to deliver the Royal Docks summer festival, Join the Docks, presenting a programme of over 150 grant funded events created in partnership with local community and cultural organisations as well as local developers. These events will include the Royal Docks Poetry Programme, a one-year partnership with Poetry School, match-funded by Innovate UK; Spread the Word's Young Poet Laureate for London and Totally Thames' The Islanders, a locally responsive heritage project celebrating the industrial and social heritage of Silvertown and North Woolwich, which will also train volunteers to conduct oral history testimonies and research local studies archives. This project will be delivered via grant funding.

School Arts Programmes & Creative Skills

- 1.14 It is recognised in the Mayor's Cultural Strategy that children who get involved in music, the arts and culture do better at school and live happier and healthier lives. Crucially, culture can also steer young Londoners away from trouble and towards education and employment. It can open new and positive pathways for London's young people. The Royal Docks Team will, therefore, continue to invest in projects which foster arts engagement in schools, including the second year of Totally Thames' Rivers of the World programme. This is an international schools programme, delivered in partnership with the British Council, which connects pupils around the globe to their local river through environmental, economic and cultural learning and themes. Newham Word Festival and the Royal Docks Poetry Programme will also engage strongly with school-age children. The Royal Docks Team will also support creative skills apprenticeships, as part of a new Royal Docks apprenticeship programme, working with creative partners including Block9, a leading arts company with a global reputation for their design work and music programming, recently relocated to the Silver Building in the Royal Docks. This project will be delivered via grant funding.

Engagement with Free Outdoor Artwork

- 1.15 The Royal Docks Team has identified both existing and new opportunities to support public art projects across the Royal Docks landscape which will create free outdoor artworks. These include The Line sculpture trail, whose popular programme has engaged new audiences, and which offers the opportunity to enhance the Royal Docks part of the route. The Line artworks enable local audiences to experience world-class artists on their doorstep, improving their cultural engagement. The Royal Docks Team will also continue to work with funded partner UP Projects to maintain the four Making Space place-responsive artworks which were (commissioned by the Royal Docks Team and installed in September 2019) and to encourage public engagement with the artworks via a programme of activities delivered throughout 2020. This project will be delivered via grant funding.

Local Cultural Network

- 1.16 Since 2018, the Royal Docks Team has engaged with a range of local and East London community and creative partners via the Royal Docks Cultural Network. This network facilitates partnership working, information sharing and enables the Royal Docks Team to support partners effectively. This network will be increasingly important in implementing the new Cultural Placemaking strategy, guiding the approach and ensuring its local relevance. The Royal Docks Team will, therefore, continue to convene and support this vital network.

PROGRAMME - putting Royal Docks on the map with events and cultural programming

- 1.17 This pillar will continue to establish a locally relevant yet world-class cultural programme to engage with local communities, attract visitors, showcase the work of local creatives and put Royal Docks on the map as a distinctive cultural destination. The Royal Docks offers a unique landscape for culture

and major events, with 96 hectares of waterscape and large meanwhile sites that can host a range of high-profile events and activities.

- 1.18 Local communities across the Royal Docks have (via the Royal Docks public consultation in summer 2019) confirmed their desire for more cultural opportunities in their local area. A compelling and consistent cultural programme will make the Royal Docks a more engaging, dynamic and attractive place for residents, visitors, workers and businesses.

Major Events

- 1.19 The Royal Docks Team will work with key local partners (Excel Centre, The Silvertown Partnership, ABP, London City Airport) to identify opportunities to attract major events and enhance their impact. This will include collaborative working with Excel and Formula E to realise joint opportunities in July 2020 to increase and spread the benefits of hosting this global racing event. In June and July 2020, the Royal Docks will host and co-commission elements of the UEFA EURO 2020 Culture Programme, playing a key part in this delivering this significant host city undertaking. This celebration of European football and culture will complement the sporting activity and offer an inspiring cultural programme for all Londoners, not just the core football fanbase. The programme will celebrate grassroots and international talent with a combination of large-scale installations and community-led cultural activity. The Royal Docks Team will also partner with ABP to host the Round the World Clipper Race finish in Royal Albert Dock in August 2020, including delivering a three-day cultural festival. This project will be delivered via grant funding.

Leading London Festivals

- 1.20 Partnerships with established London festivals allow the Royal Docks Team to present and co-commission high-quality work from leading UK and international artists and attract new audiences to the Royal Docks. The Royal Docks Team will work in partnership with Greenwich and Docklands International Festival (GDIF) to present three place-responsive works and host a UK producer's conference. It is Greenwich and Docklands International Festival's 25th anniversary in 2020, and the associated promotional campaign will further help promote Royal Docks as a cultural destination. The Royal Docks partnership with the London Festival of Architecture (LFA), now in its fourth year, will present a programme inspired by the 2020 theme of Power. As an area undergoing significant development and regeneration, the Royal Docks will once again be one of four festival hubs. In July 2020, the Royal Docks Team will work with leading biennial festival, London International Festival of Theatre (LIFT) to co-commission and host a new work in collaboration with local people. This project will be delivered via grant funding.

Programme Evaluation

- 1.21 Evaluation is a vital component of monitoring and reviewing the impact of the Activation Programme. It is the tool the Royal Docks Team will use to capture and evaluate economic and social impacts and produce required reporting to the Royal Docks Enterprise Zone Programme Board and LEAP. In 2020/21, the Royal Docks Team will continue to work with appointed research company DJS in the second year of the current three-year agreement. This research will produce benchmark information and inform future programme development. This will be commissioned via the TfL Framework.
- 1.22 In addition to the evaluation outlined above, the Royal Docks Team will also undertake further research and development work arising from the Cultural Placemaking Strategy in order to implement the recommendations and further develop projects.

Procurement and Delivery

- 1.23 Following this approval, the Royal Docks Team will commence procurement, provision of grant funding and full due diligence for the proposed projects to ensure that services are properly procured, that

funding is distributed fairly and transparently in accordance with the GLA's equality policy, State Aid rules and in a manner which affords value for money in accordance with the GLA Contracts and Funding Code. This will be done in conjunction with TfL Procurement and TfL Legal.

- 1.24 Detailed budget information is available in Part 2 of this Decision Form.
- 1.25 For the events delivered by the Royal Docks Team, sponsorship, funding and other income and concessions (if relevant and appropriate e.g. food and drink stalls/ marquee space at events) will be sought. All external income sought will be in accordance with the GLA Sponsorship Policy.
- 1.26 In addition to cash income, the Royal Docks Team will also seek benefit in kind, such as contributions to event programming or other content, to assist in the enhancement and promotion of events.

2. Objectives and expected outcomes

- 2.1 The Activation Programme will deliver against the following strategic objectives in the Royal Docks Enterprise Zone Delivery Plan and by creating the following expected outputs:

Strategic Objective	Expected Outputs
Help create lively, attractive and cohesive neighbourhoods animated by a cultural offer	<ul style="list-style-type: none"> • A month-long summer cultural festival. • At least 30 grant funding opportunities for cultural and community organisations in Newham and London. • A creative skills training programme (set design, festival production, etc.) targeting local young people. • Up to 50,000 attendees at Royal Docks events. • Up to 50 cultural events delivered. • Up to 20 community events delivered.
Engage local communities in their changing place via the cultural programme	<ul style="list-style-type: none"> • A global arts programme delivered across local schools. • Development and delivery of place-responsive heritage project.
Increase visitor and local footfall through consistent and varied programming	<ul style="list-style-type: none"> • Attracting visitors to the phase 1 development of Royal Albert Dock via Royal Docks Team led programmes such as Join the Docks, Round the World Clipper Race, RD Poetry Programme and Royal Docks Team brokered partnerships.
Position the Royal Docks on the world stage as a distinct location for unique, ambitious events	<ul style="list-style-type: none"> • Deliver a series of high quality, locally relevant cultural projects for Euro 2020 positioning Royal Docks within the host city programme. • Partnership with established international outdoor arts festival GDIF presenting unexpected spectacular moments in the Royal Docks.
Maximise cultural programming opportunities and impact through local partnerships	<ul style="list-style-type: none"> • Maximising opportunities offered by key stakeholder organisations (e.g. Excel and Formula E) to deliver benefits and impacts across the wider Royal Docks footprint with linked promotion and programming.

- 2.2 The projects will deliver the following wider outcomes and outputs:
- improved perception/ awareness of Royal Docks as a destination;
 - improved arts, heritage, sports and cultural provision and access;
 - increase in footfall, dwell time and local spend;

- improved social cohesion and sense of community;
- increase in reported levels of cultural and leisure engagement;
- improved cultural partnership working (local, national and international); and
- increased creative opportunities for young people.

3. Equality comments

- 3.1 Under Section 149 of the Equality Act 2010, as a public authority, the GLA must have ‘due regard’ of the need to:
- eliminate unlawful discrimination, harassment, and victimisation; and
 - advance equality of opportunity and foster good relations between people who have a protected characteristic and those who do not.
- 3.2 The Royal Docks Enterprise Zone Delivery Plan projects will deliver against a range of Mayor of London policies (see 4.2) and is aligned with the Mayor’s Equalities Framework to consider the requirements of relevant equalities groups. Impact assessments will determine whether any persons with those characteristics will be unduly impacted by the activities described in this paper, and the course of action in order to mitigate any impacts.
- 3.3 The programme will be inclusive, with the majority of the programme free to attend/participate. Inclusivity will be achieved through co-design, programme content and a broad and targeted approach to marketing channels, and access facilities. All of the projects will work to bring different communities together, sharing cultures and supporting social integration.
- 3.4 The programme outlined above will enable the Royal Docks Team to deliver to the diversity commitments set out in Mayoral Strategies (see 4.2).

4. Other considerations

Mayoral Strategies and Priorities

- 4.1 The Activation Programme will contribute to the following priorities from the Mayor’s Culture Strategy:
- Love London – more people experiencing and creating culture on their doorstep;
 - Culture and Good Growth – supporting, saving and sustaining cultural places and spaces;
 - Creative Londoners – investing in a diverse creative workforce for the future; and
 - World City – a global creative powerhouse today and in the future.
- 4.2 In addition to helping deliver the Mayor’s Culture Strategy priorities, the Royal Docks Activation Programme will also help deliver the following Mayoral policies and strategies:
- the Mayor’s Cultural Infrastructure Plan;
 - the Mayor’s Vision for London as a 24-hour City, From good night to great night;
 - the Mayor’s Response to the London Night Time Commission report;
 - the Thames Estuary Production Corridor, From Vision to Action report;
 - the Case for a River Thames Cultural Vision;

- the Mayor's Skills for Londoners Strategy;
- the Mayor's Equality, Diversity and Inclusion Strategy, Inclusive London;
- the Mayor's London Health Inequalities Strategy;
- the Mayor's Strategy for Sport, Sport for all of us;
- the Mayor's Economic Development Strategy for London;
- the London Plan;
- the Mayor's London Housing Strategy;
- the Mayor's London Environment Strategy; and
- the Mayor's Transport Strategy.

- 4.3 There are no conflicts of interest to declare from anyone involved in the drafting or clearance of this Decision form.

Key Risks

- 4.4 Reputational risk to the Mayor of London and Mayor of Newham as a result of Activation activity not delivering on its stated objectives. To mitigate this risk, the Royal Docks Team will ensure major events partners are all experienced organisations with a track record of delivering large-scale events and engagement with multiple stakeholders. There is also a robust multi-agency planning process (Safety Advisory Group) for the Activation Programme, so early indications of potential failure can be identified.
- 4.5 Communities not being involved or participating in the Activation Programme and the reputational risk to the Mayors associated with this. To mitigate this risk, the Royal Docks Team, with the support of London Borough of Newham's Community Neighbourhoods Team, will make sure engagement and consultation are made with all relevant communities.
- 4.6 Lack of attendance and footfall at events and failure to engage diverse representative audiences. To mitigate this risk, the Royal Docks Team will ensure a clear communications plan is in place to manage all marketing and promotion of all Activation projects.
- 4.7 Poor performance and under-delivery by service providers. Management and oversight of service providers – a detailed project plan will be produced outlining deadlines and Key Performance Indicators.
- 4.8 Delays in the programme may occur. To mitigate this risk, a detailed project plan, outlining timescales will be created. Contingency time will be incorporated into the project plan to manage over-runs.
- 4.9 A summary of the most significant project level risks are reported to the Royal Docks Enterprise Zone Programme Board on a quarterly basis. A risk register is maintained to continuously review programme delivery.

5. Financial comments

- 5.1 This decision requests approval for up to £1,436,000 of revenue expenditure from the Royal Docks Enterprise Zone approved budget for the 2020-21 Activation programme. The expenditure will be incurred in 2020-21.
- 5.2 This expenditure will be funded from the £212.5 million approved delivery plan budget confirmed in MD2338. These projects outlined in this decision were endorsed by the Royal Docks Enterprise Zone Programme Board on 17 December 2019.

5.3 Detailed budget information is available in the private Part 2 of this Decision Form.

6. Legal comments

6.1 The foregoing sections of this report indicate that the decisions requested of the Executive Director concern the exercise of the GLA's general powers, falling within the GLA's statutory powers to do such things considered to further or which are facilitative of, conducive or incidental to the promotion of economic development and wealth creation, social development or the promotion of the improvement of the environment, in Greater London.

6.2 In implementing the proposals in respect of which a decision is sought, officers should comply with the GLA's related statutory duties to:

- pay due regard to the principle that there should be equality of opportunity for all people;
- consider how the proposals will promote the improvement of health of persons, health inequalities between persons and to contribute towards the achievement of sustainable development in the United Kingdom; and
- consult with appropriate bodies.

6.3 In taking the decisions requested, the Executive Director must have due regard to the Public Sector Equality Duty under section 149 of the Equality Act 2010, namely the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010, to advance equality of opportunity between persons who share a relevant protected characteristic (age, disability, gender reassignment, pregnancy and maternity, race, gender, religion or belief, sexual orientation) and to foster good relations between persons who share a relevant protected characteristic and persons who do not share it. To this end, the Executive Director should have particular regard to section 3 (above) of this report.

6.4 Section 1 of this report indicates that the GLA intends to procure services. Section 9 of the GLA Contracts & Funding Code requires the GLA to engage with TfL Procurement, develop a procurement strategy with TfL Commercial (if valued over £100,000) and seek a call-off from a suitable framework where possible or, if not, undertake a formal tender process to procure such services in relation to all contracts for services with a value above £150,000 before the commencement of the services.

6.5 Section 1 of this report also indicates that the GLA intends to vary an existing contract for services. Officers should seek support from TfL Procurement as required when varying any contracts and ensure that variations are properly executed before using such services.

6.6 Section 1 of this report indicates that part of the sought budget will amount to the provision of grant funding and not payment for services. Officers must ensure that the funding is distributed fairly, transparently, in accordance with the GLA's equality policy, State Aid rules and in manner which affords value for money in accordance with the GLA Contracts and Funding Code. Officers must ensure that an appropriate funding agreement is put in place and executed by the GLA and the recipient before any commitment to funding is made.

7. Planned delivery approach and next steps

Activity	Timeline
DD Approved	March 2020
Delivery Start Date	April 2020

Delivery of Projects	April 2020 to March 2021
Delivery End Date	March 2021
Project Closure	May 2021

Appendices and supporting papers:

None

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary.

Note: This form (Part 1) will either be published within one working day after it has been approved or on the defer date.

Part 1 Deferral:**Is the publication of Part 1 of this approval to be deferred? YES**

If YES, for what reason:

If YES, for what reason: DD is to be deferred as the disclosure of the estimated Activation Programme costs would prejudice the GLA's ability to solicit genuinely competitive bids for related services. The Royal Docks team also undertake consultation with communities and projects who receive funding, and the disclosure of ring-fenced budget prior to any full funding application process or partnership might adversely affect subsequent funding negotiations/ outcomes.

Until what date: (a date is required if deferring) October 2020.

Part 2 Confidentiality: Only the facts or advice considered to be exempt from disclosure under the FOI Act should be in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – YES

ORIGINATING OFFICER DECLARATION:

Drafting officer
to confirm the
following (✓)

Drafting officer:

David Holley has drafted this report in accordance with GLA procedures and confirms that: ✓

Assistant Director/Head of Service:

Simon Powell has reviewed the documentation and is satisfied for it to be referred to the Sponsoring Director for approval. ✓

Financial and Legal advice:

The Finance and Legal teams have commented on this proposal, and this decision reflects their comments. ✓

Corporate Investment Board:

The Corporate Investment Board reviewed this proposal on 2 March 2020.

EXECUTIVE DIRECTOR, RESOURCES:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature

M. D. Bell

Date

2.3.20

