

GREATER LONDON AUTHORITY

REQUEST FOR DIRECTOR DECISION – DD2077

Title: Energy for Londoners Not for Profit Energy Supply Company options appraisal

Executive Summary:

The Mayor in his election manifesto committed to 'Establish Energy for Londoners, a not-for-profit company providing a comprehensive range of energy services to help Londoners generate more low-carbon energy and increase their energy efficiency, support local and community energy enterprises, and buy clean energy generated across the city, using it to power GLA and TfL facilities.

Approval is sought to procure a consultant to undertake a detailed options appraisal on three energy supply company options.

Decision:

The Executive Director Development Enterprise and Environment approves expenditure of up to £60,000 in 2016-17 to undertake a full options appraisal of the following options (1,2 & 3) for an Energy For Londoners not for profit supply company considering the criteria set out in the body of the decision form:

1. White Label Plus
2. Full Supply Licence – Mutual
3. Full Supply Licence – Consortium company

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: Fiona Fletcher-Smith

Position: Executive Director Development Enterprise and Environment

Signature:



Date:

17.1.2017

PART I - NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1. Introduction and background

- 1.1 The Mayor in his election manifesto committed to 'Establish Energy for Londoners, a not-for-profit company providing a comprehensive range of energy services to help Londoners generate more low-carbon energy and increase their energy efficiency, support local and community energy enterprises, and buy clean energy generated across the city, using it to power GLA and TfL facilities.
- 1.2 The Energy for Londoners programme will be an umbrella programme for all of the Mayor's activities on energy efficiency, fuel poverty, low carbon energy generation and climate change mitigation. The proposed not-for-profit energy company (EfLCo) is an integral component of the delivery of the Mayor's vision for a zero carbon London by 2050, and a fairer and more affordable energy system in London.
- 1.3 The objectives of an EfLCo are to:
- Reduce and alleviate fuel poverty and energy bill debt amongst Londoners, through the provision of fairer and more affordable tariffs
 - Reduce carbon dioxide emissions through the promotion and improvement of buildings energy efficiency
 - Encourage the generation of low carbon energy through provision of a market for surplus generation
 - Minimise the need for investment in additional infrastructure by managing energy demand more effectively and efficiently.
- 1.4 The primary objective is to reduce and alleviate fuel poverty and therefore initial focus should be on provision of gas and electricity to the residential market. However, consideration should be given to provision to the commercial market, particularly public sector which would open up a sizeable market in London as existing contracts expire.
- 1.5 Approval is sought to procure specialist consultants to undertake the options appraisal for the three options set out above in line with the GLA's Contracts Code.

2. Objectives and expected outcomes from the consultants

- 2.1 There are a range of options between a White Label and a GLA-owned fully licensed supply company.

White label scheme

- a. standard white label scheme whereby the GLA would procure a licensed energy supply company to provide energy, which would be branded as Energy for Londoners.
- b. white label plus – GLA would seek to establish more of a partnership arrangement with a licensed energy supply company in order to have greater control over factors such as tariffs and sources of energy.

Full supply licence

- c. a company fully owned by the GLA, would be a fully licensed supply company.
- d. consortium – a separate company or SPV is established, and owned by GLA and others, such as the Boroughs.

- e. mutual – a community benefit society (CBS) would be established with GLA, Boroughs, housing associations and community energy groups as members, and the fully licensed supply company would be owned by the CBS.
- f. equity – GLA (or subsidiary company) could take an equity stake in an existing fully licensed supply company.
- g. purchase – GLA (or subsidiary company) could purchase an existing operational fully licensed supply company (not ‘supplier in a box’ but an operational company that has already achieved full market entry).

2.2 Objectives

The primary objectives for the successful bidder will be to:

- provide a detailed assessment of the three options set out below
- evaluate the three options based on the essential criteria set out below
- develop an outline business case for the option that delivers against each of the essential criteria

2.3 The three options to be assessed are:

- White Label Plus
- Full Supply Licence – Mutual
- Full Supply Licence – Consortium company

2.4 Outcome

We expect the consultants to produce a written review of the three options against a range of evaluation criteria, and produce an outline business case for the preferred option. The written review should include all data and assumptions used to conclude a preferred option to take to OBC phase.

3 Equality comments

- 3.1 The proposal is in accordance with the Greater London Authority’s Equalities Framework in relation to this procurement. Consultants will be asked to demonstrate how they comply with the Mayor’s Equality and Diversity Policy Statement and related documents.
- 3.2 The Energy for Londoners programme has equality at its core and the successful bidder will be required to assess each of the options against a number of equality indicators.

4 Other considerations

a) Key risks

- 4.1 None of the options to be assessed perform well against all or the majority of the criteria. This has been mitigated through the selection of a range of options, each of which have been proven to deliver against the relevant criteria.

b) Links to Mayoral strategies and priorities

- 4.2 The Mayor, in his manifesto, committed to the establishment of a not-for-profit company, Energy for Londoners, to offer fairer and more affordable energy bills for Londoners and to increase the generation of low carbon energy.
- 4.3 The developing Mayor’s Environment Strategy will reflect the manifesto pledge and the outcome of the options appraisal for a not for profit energy supply company.

c) Impact assessments and consultations

- 4.4 The preferred option for a not for profit energy supply company will be consulted on as part of the Mayor’s Environment Strategy consultation in spring 2017

5 Financial comments

- 5.1 MD1640 previously approved expenditure for the consultancy to the Business Energy Challenge. Approval is now being sought for expenditure of up to £60,000 to procure a consultant to undertake appraisals on three energy supply companies. The cost will be funded from the Environment team's London Energy Plan 2016-17 Budget.
- 5.2 As this work relates to consultancy contract, officers have to ensure that the requirements of the Authority's Contract & Funding Code are adhered to and that the requirements relating to consultancy services within the Authority's Financial Regulations and Expenses & Benefits Framework are adhered.
- 5.3 Any changes to this proposal, including budgetary implications, will be subject to further approval via the Authority's decision-making process.

6 Legal comments

- 6.1 The GLA's principal purposes, under section 30 of the Greater London Authority Act 1999, are promoting economic development and wealth creation, promoting social development, and promoting the improvement of the environment, all in Greater London. At this stage various options as to the structure of the scheme are to be considered. The GLA has power under section 30 of the Greater London Authority Act 1999 to operate in the area of energy supply and related matters, on the basis that such operation is calculated to produce social and environmental benefits. Under section 95 of the Local Government Act 2003 the GLA can, through a company, do for a commercial purpose anything it is authorised to do for the purposes of its ordinary functions.
- 6.2 Further, the Authority also has a subsidiary power pursuant to Section 34 of the Act. This gives the Mayor the authority to do anything which is calculated to facilitate or, is conducive or incidental to the exercise of any of the statutory functions of the Authority. In this case, the procurement of a consultant to provide advice in relation to the options set out above, may be viewed as being calculated to facilitate and conducive and incidental to all of GLA's various functions
- 6.3 Sections 1 to 4 of this report indicate:
- that the decision requested falls within the GLA's statutory powers to do things considered to further, or which are facilitative of, conducive or incidental to the discharge of, its general functions; and
 - that due regard has been had to the principle that there should be equality of opportunity for all people further details on equalities are set out in section 3 above.
- 6.4 Under Section 4.1 of the GLA's Contracts and Funding Code (the "Code")) this requires the GLA to undertake a formal tender process or make a call off from an accessible framework for procurements with a value between £10,000 and £150,000. As noted in paragraph 1.6, Officers will follow the Code. Officers must ensure that an appropriate contractual document is put in place.
- 6.5 Further legal consideration should be given to any recommended option, if and when the GLA wishes to pursue it.

7. Planned delivery approach and next steps

Activity	Timeline
Procurement of contract [for externally delivered projects]	Beginning of January 2017
Delivery Start Date [for project proposals]	February 2017
Delivery End Date [for project proposals]	March 2017
Project Closure: [for project proposals]	March 2017

Appendices and supporting papers:

Annex 1 – Energy for Londoners not for profit energy supply company specification

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FOI Act) 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 approval or on the defer date.

Part 1 Deferral:

Is the publication of Part 1 of this approval to be deferred? NO

If YES, for what reason:

Until what date: (a date is required if deferring)

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 – NO

ORIGINATING OFFICER DECLARATION:

Drafting officer to
confirm the
following (✓)

Drafting officer:

Andrew Richmond has drafted this report in accordance with GLA procedures and confirm that:

✓

Assistant Director/Head of Service:

Patrick Feehily 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 16 January 2017.

EXECUTIVE DIRECTOR, RESOURCES:

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

Signature

M. J. Allen

Date

17.1.17

Annex 1

Specification: GLA

Energy for Londoners feasibility assessment

06 January 2017

1. Introduction

1.1 This document is the specification for a Greater London Authority (GLA) funded project, 'Energy for Londoners (not for profit) Supply Company Feasibility Assessment' ('the project'). Energy for Londoners is an umbrella programme incorporating all the Mayor's activities relating to energy efficiency, energy generation and fuel poverty, as well as the exploration of a not for profit energy supply company. The project will focus on the assessing a shortlist of two primary options for the supply company, as well as structural and governance arrangements, available to London for a not for profit energy company.

1.2 The project will provide:

- a detailed assessment of two not for profit energy supply company options set out below, including shortlisted structure and governance, and in particular assess the risk, benefits and outline costs of the options. The contractor will be expected to assess the ability of each of the options to be implemented in London, the indicative cost over the first five years, the level of risk (both financial and reputational) of each option and any other key risks associated with the options.
- This should cover, but not be limited to, an assessment of the likelihood of the option to:
 - reduce consumer energy bills
 - alleviate fuel poverty
 - reduce carbon emissions
 - increase customer building energy efficiency
 - increase the number of smart meters in domestic properties
 - move consumers from pre-payment meters to smart pre-payment meters
 - increase renewable and low carbon energy generation
 - Increasing community energy generation
 - Increase democratic accountability
- The assessment should also evaluate and compare, although not be limited to, the following:
 - set up costs
 - capital costs (working capital/loan for five years operation)
 - timeframe for establishment of initial governance structures
 - procurement requirements
 - timeframe for having an offer to customers
 - annual customer acquisition targets required
 - financial risks
 - reputational risks
 - London borough participation and engagement
 - democratic/community participation and engagement
 - stakeholder expectations
 - opportunities for expansion/growth
 - links to other programmes, including energy efficiency retrofit, fuel poverty, energy generation, Licence Lite, and waste/secondary heat utilisation.
 - wider benefits
- The assessment should also reflect the aspiration that a not for profit energy supply company should acquire and benefit those Londoners in most need of help and support over and above the acquisition of the greatest number of customers

2. Context

The Mayor has an ambition of London being a zero carbon city by 2050, as well as a manifesto commitment to establish a not-for-profit company, Energy for Londoners, to offer fairer and more affordable energy bills for Londoners and to increase the generation of low carbon energy.

The Mayor is also in the process of establishing Licence Lite in London, which will purchase low carbon electricity from generators and look to sell it, initially, to Transport for London.

The objectives of Energy for Londoners energy supply company are to:

- Reduce and alleviate fuel poverty and energy bill debt amongst Londoners, through the provision of fairer and more affordable tariffs
- Reduce carbon dioxide emissions through the promotion and improvement of buildings energy efficiency
- Encourage the generation of low carbon energy through provision of a stable market for it
- Minimise the need for investment in additional infrastructure by managing energy demand more effectively and efficiently

Profit-making would not be a primary objective, although any profit that is made would be re-invested in fuel poverty and energy efficiency programmes, or in pursuit of other social objectives.

As the primary objective is to reduce and alleviate fuel poverty, initial focus should be on provision of gas and electricity to the residential market. However, consideration should be given to provision to the commercial market, particularly public sector which would open up a sizeable market in London as existing contracts expire.

Options

There are a range of options from a simple White Label to a GLA-owned fully licensed supply company at the other. White label scheme

- a. standard white label scheme whereby the GLA would procure a licensed energy supply company to provide energy, which would be branded as Energy for Londoners.
- b. white label plus – GLA would seek to establish more of a partnership arrangement with a licensed energy supply company in order to have greater control over factors such as tariffs and sources of energy.

2. Full supply licence

- a. a company fully owned by the GLA, would be a fully licensed supply company.
- b. consortium – a separate company or SPV is established, and owned by GLA and others, such as the Boroughs.
- c. mutual – a community benefit society (CBS) would be established with GLA, Boroughs, housing associations and community energy groups as members, and the fully licensed supply company would be owned by the CBS.
- d. equity – GLA (or subsidiary company) could take an equity stake in an existing fully licensed supply company.
- e. purchase – GLA (or subsidiary company) could purchase an existing operational fully licensed supply company (not 'supplier in a box' but an operational company that has already achieved full market entry).

The options, fundamentally, are between a white label and full supply licence. However, after some internal analysis, the shortlisted versions of these are:

- Full supply licence – mutual
- Full supply licence – consortium
- White label plus

3. Objectives

3.1 The primary objectives of the project are to:

- provide a detailed assessment of the three options set out below
- evaluate the three options based on the essential criteria set out below
- develop an outline business case for the option that is most likely to deliver the objectives and meet the essential criteria

4. Project scope

- 4.1 The scope of the project is to assess the following three approaches to the provision of a not for profit energy supply company against the evaluation criteria set out in the introduction and repeated below.
- 4.2 The options to be assessed are:
- 4.2.1 **White label plus** – GLA would seek to establish a partnership arrangement with a licensed energy supply company with the greatest level of control over factors such as tariffs and sources of energy as possible.
- 4.2.2 **Full supply licence consortium** – a separate company or SPV is established, and owned by GLA and others, such as the Boroughs.
- 4.2.3 **Full supply licence mutual** – a community benefit society (CBS) would be established, and the fully licensed supply company would be owned by the CBS.
- 4.3 The criteria against which these options are to be assessed are but not be limited to, an assessment of the likelihood of the option to:
- Reduce consumer energy bills
 - alleviate fuel poverty
 - reduce carbon emissions
 - increase customer building energy efficiency
 - increase the number of smart meters in domestic properties
 - move consumers from pre-payment meters to smart pre-payment meters
 - increase renewable and low carbon energy generation
 - Increasing community energy generation
 - Increase democratic accountability
- 4.4 The assessment should also evaluate and compare, although not be limited to, the following:
- set up costs
 - capital costs (working capital/loan for five years operation)
 - timeframe for establishment of initial governance structures
 - procurement requirements
 - timeframe for having an offer to customers
 - annual customer acquisition targets required, total and as proportion of total potential customer base in London
 - financial risks
 - reputational risks
 - London borough participation and engagement
 - democratic/community participation and engagement
 - stakeholder expectations
 - opportunities for expansion/growth
 - links to other programmes, including energy efficiency retrofit, fuel poverty, energy generation, Licence Lite, and waste/secondary heat utilisation.
 - wider benefits
- 4.5 The assessment should also fully consider the societal benefit, be able to target the offers and the subsequent interventions to those in most need, be as resilient to future market conditions as possible, able to benchmark for customer acquisition and in the case of the White Label Plus – be able to transition into a full supply licence if so desired. Consideration should also be given to formation of the mutual/consortium upfront for the White Label Plus option.

5. Project deliverables

- 5.1 The project will involve the following tasks and outputs:
- 5.2 A full qualitative and quantitative assessment of the three options set out in in paragraph 4.2 above against the criteria set out in paragraphs 4.3 to 4.5 inclusive.
- 5.3 Detailed report on the methods of assessment undertaken and any assumptions and proxies made
- 5.4 A summary table of the three options appraisals set out in a format that is conducive to aid comparison
- 5.5 Outline business plan for the preferred option

5.6 Recommended next steps

6. Data requirements

7.1 Any data provided as part of the assessment should meet data requirements listed at **Appendix A**.

7. Meeting the specification

8.2 When submitting tenders, bidders should demonstrate how they meet the above specification, including the following:

8.3 Methodology

8.4 It is anticipated that details of the final methodology will be agreed by the client and successful bidder at the project inception meeting. However, in responding to the brief, submissions should be structured around the following headings/sub-headings (and not exceed 25 sides of A4 overall):

- how the **three scenarios will be assessed to ensure comparability**
- Reference cases to be used to provide a benchmark
- **how assumptions will be sourced and referenced** in a way that the GLA can later consult on and update

8.5 Work plan and project management

8.6 Submissions should include a detailed work plan including key milestones in the project and time spent on each element of the project. It should also outline how the project objectives and deliverables will be delivered to time and expected standard. In addition, a table of key assumptions, risks and issues should be included.

8.7 Tenders should indicate a clear project management structure.

8.8 Sub-contracted consultancy services will be considered, where it is clear they will enhance the delivery of the project objectives.

8.9 Tenders should indicate how the relationship with the GLA will be managed and consider that:

- regular contact will be required with the GLA (including regular written updates and proof of progress)
- intellectual property of all materials will remain the ownership of the GLA (although the GLA may choose to make the outputs public/open source, as appropriate)

8.10 Experience

8.11 Tenders should include details of the proposed project team members, CVs, and relevant experience/expertise in similar projects in relation to the GB energy market, advising on setting up and/or running energy companies in Britain, understanding of the unique challenges of municipal energy companies, business planning for businesses in the GB energy market, and qualitative and quantitative analysis.

8.12 Tenders should demonstrate knowledge of the GB energy market, energy supply company systems, supply licence regulations and codes, and a good working knowledge of the public sector roles, responsibilities and limitations.

8.13 Tenders should include references from at least two organisations from previous similar projects and any comparable examples of written reports.

8.14 Price

8.15 Quotes should include prices for each stage and an indication of the proportion of time spent by each proposed team member throughout the duration of the commission, along with their day rates.

8.16 Please complete the attached Pricing Schedule.

8. Evaluation criteria

9.1 Tender submissions will be assessed against the following criteria:

Methodology	30%
Work plan and project management	15%
Experience	25%
Price	30%

9.2 The marks for each question in the technical section will be given in the range of 0-5, where 5 is the highest mark and 0 is the lowest mark achievable.

0 – Unacceptable.	Demonstrates lack of evidence of understanding of the requirement.
1 – Poor	Does not completely meet the minimum requirement and acceptability is doubtful.
2 – Fair	Shows some evidence of understanding of the requirement but provides a limited or inadequate response.
3 – Good	Demonstrates satisfactory understanding of the requirement – meets minimum

	requirement.
4 – Very Good	Demonstrates good understanding of the requirement above minimum requirement.
5 – Excellent	Full and accurate understanding of the requirement with some innovation/added value.

9. Timetable

10.1 The contractors should devise a programme of work and resourcing to reflect the following key stages.

Tender issued	w/c 9 January 2017
Deadline for bids	20 January 2017
Bidder Interviews	w/c 23 January 2017
Bidders informed of procurement decision	w/c 23 January 2017
Contract awarded	w/c 30 January 2017
Inception meeting	w/c 30 January 2017
Interim (report) milestone 1:	3 March 2017
Final report:	24 March 2017

10.2 The GLA will accept consortium bids.

10.3 The GLA reserves the right to invite up to 3 bidders to a Bidder Interview. Please ensure you are available if requested to attend.

10.4 Bidders may propose revised interim milestones where this assists with delivery of the final milestone.

10. Payment and stage payments

11.1 Payment will be made subject to satisfactory completion of project milestones. This will be agreed at the inception meeting.

11. Responsible Procurement Policy

12.1 Responsible Procurement is an essential factor in all the Authority's contracts. Please see link to the Responsible Procurement Policy for more information: <http://www.london.gov.uk/rp/>

12. Conflict of Interests

13.1 Consultants bidding for this project will need to declare any actual or potential conflicts of interest.

13. Questions and queries

14.1 Any questions or clarifications about this brief should be submitted via the e-tendering system.

Please respond via the TfL e-tendering portal Euro Dynamics:

<https://eprocurement.tfl.gov.uk/epps/home.do>

To be received no later than 15:00 on 20 January 2017

Enquiries about any aspect of this procurement should be addressed to Amanda Fearing, Assistant Commercial Manager, via the e-tendering portal. The clarifications and their responses will be published to all the suppliers taking part in this procurement.

If you are experiencing problems using this portal please contact the help-desk in the first instance or you may e-mail AmandaFearing@tfl.gov.uk

Acceptance of Tenders

- The Organisation shall not be bound to accept the lowest tender received or any quote submitted as a result of this invitation. The Organisation shall reserve the right to accept all or any part of an offer and, if necessary, establish trading arrangements with more than one supplier.
- Any unsolicited re-tenders shall not be considered.
- Any incomplete Tenders or Tenders which contain exceptions and deviations may be rejected at the Organisation's sole discretion.
- Tenders shall be delivered free of charge, the Organisation shall not be liable to pay any costs of the Tenderer regardless of whether the Tenderer is successful or not.
- The submission of a tender shall be deemed to be an undertaking that the tender prices allow for compliance with all of the tender requirements and contract terms instructions.
- It may be necessary as part of the evaluation process to seek clarifications and to invite some or all of the suppliers for interview and to visit some or all of the supplier's premises.
- All tenders must be compiled and all correspondence conducted in the English language.
- All responses are to arrive no later than the date and time specified. Responses not received by this deadline may be rejected without notification.

Additional conditions on acceptance of tenders:

The Organisation reserves the right:

- (i) to terminate the ITT or tender procedure at any time without awarding the contract(s) for the provision of services
- (ii) to select suppliers based on evaluation of the Tenders in accordance with the award criteria and weighting set out in this ITT;
- (iii) based on evaluation of each Tender in accordance with the award criteria and weighting set out in this ITT to exclude any Tenderer from further participation in respect of the ITT or tender process;
- (iv) and without prior discussion with any Tenderer to modify the rules and procedures set out in this ITT or any other procedures relating to the ITT provided that such modifications will be notified to all Tenderers. In no instance will TfL or any other member of the TfL Group be required to give any reason for such termination or alteration of the process, provided that TfL will disclose to each Tenderer upon request information about the evaluation of their Tender.
- (v) Opportunity Adjustment.

Following its evaluation of the Bids received, TfL may, in its sole discretion, invite bidders (by application of

the evaluation criteria set out in the ITT) to prepare and submit further opportunities to adjust the price element of their submission. At TfL's discretion there may be up to three such opportunities for adjustment. This is an optional stage in the Tender Process and will only be included where TfL considers it would be helpful and/or beneficial to do so.

(vi) Confidentiality – Copyright and Intellectual Property Rights

All project work and outputs should be treated in strictest confidence and discussed with third parties only with TfL's explicit sanction. Similarly, that copyright and intellectual property rights in all project work and outputs will reside with TfL/GLA.

Appendix A: Data Requirements / Output Formats

- 1.1 Data should be provided in Excel files and where applicable ArcGIS files (e.g. for location information) which may be published on the London Datastore at a later date.
- 1.2 The analysis and formatting of the Excel files should be of a professional standard and include a summary sheet with top-line data and a list of assumptions used in the data and reference sources.
- 1.3 All assumptions should be included in such a way that GLA can consult and later change if necessary.
- 1.4 The layout of any worksheet(s) must be consistent, logical, use simple formulas and clearly identify all input data and sources.
- 1.5 All data files should be saved as CSV files (with explanatory notes in a separate document).

Appendix A: Data Requirements / Output Formats

- 1.6 Data should be provided in Excel files and where applicable ArcGIS files (e.g. for location information) which may be published on the London Datastore at a later date.
- 1.7 The analysis and formatting of the Excel files should be of a professional standard and include a summary sheet with top-line data and a list of assumptions used in the data and reference sources.
- 1.8 All assumptions should be included in such a way that GLA can consult and later change if necessary.
- 1.9 The layout of any worksheet(s) must be consistent, logical, use simple formulas and clearly identify all input data and sources.
- 1.10 All data files should be saved as CSV files (with explanatory notes in a separate document).

References

GLA

- Mayoral Priorities: http://www.sadiq.london/a_manifesto_for_all_londoners

Other

- The Greater London Authority Act 2007
European Directive 92/43/EC (on the "conservation of natural habitats and wild fauna and flora for plans" that may have an impact of European (Natura 2000) Sites)

