

REPORT TO CABINET

Open		Would any decisions proposed :			
Any especially affected Wards South Lynn	Discretionary	Be entirely within Cabinet's powers to decide		NO (part)	
		Need to be recommendations to Council		YES (part)	
		Is it a Key Decision		NO	
Lead Member: Cllr Baljinder Anota and Cllr Michael de Whalley E-mail: cllr.Baljinder.Anota@West-Norfolk.gov.uk cllr.michael.dewhalley@west-norfolk.gov.uk		Other Cabinet Members consulted: Cllr Parish and Cllr Moriarty			
Lead Officer: Ged Greaves and Matthew Henry E-mail: Ged.Greaves@West-Norfolk.gov.uk matthew.henry@West-Norfolk.gov.uk Direct Dial:		Other Members consulted: Cllr Joyce, Cllr Kemp, Cllr Heneghan, Cllr Bone			
Other Officers consulted: Lorraine Gore, Stuart Ashworth and James Arrandale					
Financial Implications YES	Policy/ Personnel Implications YES/NO	Statutory Implications YES	Equal Impact Assessment YES If YES: Pre-screening	Risk Management Implications NO	Environmental Considerations YES

Date of meeting: 15 January 2024

DESIGNATION OF A VILLAGE GREEN – SOUTH LYNN

Summary

This report brings forward a proposal for designation of a Village Green on land to the west of Hardings Way, South Lynn. This land is owned by the Borough Council.

The report also details proposals for the establishment of a community orchard which will form part of the Village Green and the Beuys's project on land to the north of the proposed Village Green.

Recommendations

It is recommended that Cabinet:

- 1) Agrees to proceed with the Community Orchard at Wisbech Road/ Harding's Way as detailed in the report
- 2) Agrees to enter into a form of agreement with the Harding's Pits Association which continues the current operational arrangements for the Harding's Pits Door Step Green. Authority to be delegated to the Assistant Director Property & Projects in consultation with the Portfolio Holder for Property and Corporate Services to agree appropriate terms and length of agreement
- 3) Supports the proposed Beuys's Acorns Project, potentially as part of the proposal for the Harding's Pits Door Step Green, with this area being extended to accommodate the Beuys's Project.

Cabinet recommend to Council:

- 4) To resolve that the land identified in the attached plan (the red shaded area to the west of Hardings Way) be designated as a Village Green.

Reason for Decision

To progress projects which enhance the environment and protect and increase green space for the benefit of the local community.

1. Community Orchard: Wisbech Road/Harding's Way

- 1.1 The Council owns a site between Harding's Way and Winfarthing Avenue that lies adjacent to the southern boundary of the current Harding's Pits Doorstep Green. The site has an area of approximately 3,500sqm.
- 1.2 The local ward members have expressed an aspiration for this grassland to be converted to a community orchard. Cllr Kemp, South and West Lynn Ward Member, has been actively involved in discussions with the Director of Public Health about Community-led Healthy Action Plans for South Lynn. The Community Orchard has been included as part of these discussions.
- 1.3 Norfolk County Council coordinated a funding application to the Forestry Commission's Urban Tree Challenge Fund and included the proposed community orchard. The funding application has been successful.
- 1.4 The funding application is for 34 mixed fruit trees. Community involvement in the planting and ongoing maintenance will be organised with input from the East of England Apples and Orchards Project, Harding's Pits Community Association and other local groups and interested individuals. The planting would have additional benefits in terms of improving biodiversity, carbon sequestration and improvement of the area's tree canopy cover.
- 1.5 Given the site's history, and potential use, a contaminated land assessment has been commissioned with sampling undertaken on 16 October 2023. The consultant's report has confirmed that the site is suitable to be planted as an orchard.
- 1.6 A planning application may need to be submitted.
- 1.7 The Urban Tree Challenge Fund will cover approximately 80% of the costs of purchasing and planting the trees together with a sum towards 3 years of watering, weeding and maintenance. These values are based on standard costs set by the Forestry Commission. The balance of the costs can be met from the corporate climate change fund. The estimated cost of the project is £29,000 with £23,000 being funded by grant and £6,000 funded by BCKLWN.

- 1.8 Hedgerow planting along the boundaries with Harding's Way and Wisbech Road is also envisaged with planting to be undertaken with volunteers and planting packs supplied free of charge by various organisations. That would provide further benefits in terms of improving biodiversity, carbon sequestration and screening of the orchard.
- 1.9 The Council would need to consider how this proposed Community Orchard would be held, run, and managed. Again, this could possibly be included within an agreement with the Harding's Pits Door Step Green Association, and included within their agreement.
- 1.10 It is intended that the site will be included in the proposed Village Green. See attached map.

2 Harding's Pits Association: Harding's Pits Door Step Green

- 2.1 In 2004 the Council secured grant funding from the Countryside Agency, now Natural England, to develop a "Door Step Green", and in doing so covenanted not to dispose of the land benefitting from the grant monies for a period of 25 years.
- 2.2 At the same time the Council entered into a "Framework Agreement" with the "Harding's Pits Community Association" in relation to the management, maintenance and operation of the Door Step Green.
- 2.3 The Door Step Green is a large and relatively featureless open space, with sculptural points of interest within it. The design and purpose of the Door Step Green is intended to provide an area of natural vegetation and to encourage biodiversity and wildlife habitats. The area is not intended to be a manicured urban park.
- 2.4 The Doorstep Green is managed by a constituted community group, the Harding's Pits Community Association Limited. A great deal of time and effort has been invested by the voluntary, and unpaid, members of the Association to create and manage the Doorstep Green during the past years.
- 2.5 The covenant attached to the funding package expires in approximately 6 years' time, and members of the community group are concerned about the future of the Door Step Green.
- 2.6 It is understood that the Association is keen to extend any form of agreement in respect of the Door Step Green area.
- 2.7 It is intended that the site will be included in the proposed Village Green. See attached map.

3. Beuys's Acorns Project: Land immediately to the north of the Harding's Pits Door Step Green

- 3.1 We have received an interesting proposal from a local artist who wishes to promote a project that was initially devised by renowned artists Ackroyd and Harvey. Their idea was to collect acorns from the 7,000 oak trees planted in the 1980s by Joseph Beuys for Documenta, in Kassel - a large contemporary art exhibition which happens every 5 years.
- 3.2 Joseph Beuys was one of the founders of the German Green movement and planted the oak trees throughout his local town as a statement about the greening of the city. As a tribute to him and this initiative, Ackroyd and Harvey have been growing their oaks as a miniature forest in air-pots, and exhibiting them widely around Europe - the latest exhibit was at Tate Modern. Each time, their exhibition has been accompanied by talks or conferences, or workshop activity programmes aimed at greater environmental awareness.
- 3.3 The trees grown from these original acorns are becoming increasingly mature and need to be planted in the ground permanently. The artists are offering groups of 7 trees to be planted in chosen locations, and Harding's Pits area has been identified as a potential location.
- 3.4 The idea is for the planting scheme to become a symbol not only for the greening of the town, but also to promote care for the environment in general. The proposal also suggests that there should be a programme of environmental activity connected with them on an annual, or periodic basis, this could fit well with the development of the Council's cultural events/activity programme.
- 3.5 The local artist has been working with the King's Lynn Civic Society and has recently met with the Council's arboricultural officer to discuss the potential of siting the trees at Harding's Pits, as part of a wider planting scheme.
- 3.6 The artists have also engaged with the local Whitefriars school, and they are keen to be involved as tree champions/guardians.
- 3.7 The site identified by the artists is the area of land immediately to the north of the Harding's Pits Door Step Green area.
- 3.8 It should be noted that this project proposal is also seeking funding to help with the set up of the tree installation, and it may be that the organization/artists will be looking to the Council to contribute. It is understood that initially this could be less than £1,000, however the on-going maintenance and management needs to be considered.
- 3.9 The proposed Beuys's Acorns Project could tie-in neatly with future arrangements for the Harding's Pits Door Step Green, with the

association taking on management and maintenance of the proposed planting, as part of their existing programme.

- 3.10 The Council could consider granting the Door Step Green Association a long form of agreement with the area extended, to include the land to the north, up to the confluence of the River Nar and the River Great Ouse.
- 3.11 At this time this area is ineligible for registration as Village Green. Section 4 below provides further details.

4. Village Green Designation

4.1 A town or village green is land that is protected from encroachment and development, in the interests of use by the local community. Unlike common land, there is no general right of public access over a village green: instead it is reserved for use by local residents.

4.2 Essential character of a village green - Protected status

4.2.1 Village greens are protected in perpetuity unless deregistered (see below), and the local community (see below) have a legal right to use the land for lawful sports and pastimes.

4.2.2 Town and village greens are protected by legislation. A person may be convicted in the Magistrates' Court and fined if they:

- encroach on, or enclose, a town or village green;
- erect anything on it; or
- disturb or interfere with it, otherwise than for its better enjoyment for its proper purpose.

4.2.3 The Local Authority can also make byelaws to protect town and village greens.

4.2.4 Works may only be allowed on the green if they are for the better enjoyment of the green, and only with the landowner's prior consent.

4.2.5 The protected status of the village green is distinct from its ownership. The land that is the green may be privately owned. If sold the land retains its protection as a village green.

4.3 Registering a Village Green

4.3.1 Anyone can apply under section 15(1) of the Commons Act 2006 to register land as a village green. Applications are made to the Commons Registration Authority - for King's Lynn, this is Norfolk County Council (NCC).

4.3.2 In cases where the applicant is the owner of the land, it only needs to demonstrate ownership. Unlike non-owners, it does not need to

demonstrate that the land has been used consistently as a green (see below).

4.3.3 There are statutory prohibitions on the registration of certain land as village green, importantly in cases where the land is earmarked for development in a local plan. See “Planning Considerations” below.

4.4 Registration Process

4.4.1 A landowner wishing to register its own land as a village green must make an application to NCC. The application must:

- include a map and description of the land, and
- identify the area where the local people who use the land live (because only those people will have a right to use the green for recreation).

4.4.2 The applicant landowner will also need to confirm in a statutory declaration that it is the owner of the land and has obtained any necessary consents.

4.4.3 Where there is a lease or charge on the land, the applicant will first need to consult any lease or charge holder to inform them that it intends to apply for registration. Written consent must be provided.

4.4.4 Once NCC is satisfied that the land is eligible (see below) and the applicant is legally entitled to apply to register the land, it should grant the land village green status - there is no need for it to examine any other merits of the request. An application cannot be rejected, but the authority can ask for further evidence of ownership.

4.4.5 For completeness, applicants for village green status commonly are not the landowner. Non-landowners must demonstrate that the land has been used by a significant number of local people for lawful “sports and pastimes” for at least 20 years “as of right”:

- “*sports and pastimes*” include organised or ad-hoc games, picnics, fetes and similar activities;
- “*as of right*” means that the land has been used without asking permission, without entering by force and not in secret.

4.5 Permission to carry out works on a town/village green

4.5.1 No special application is required for works as long as they do not contravene the “better enjoyment” requirement. However, other consents may still be required, e.g. planning permission.

4.5.2 However, it is a criminal offence to undertake any works that do contravene the “better enjoyment” requirement. Depending on circumstances, they may be dealt with as a public nuisance.

4.6 De-registering a town/village green

4.6.1 Under section 16 of the Commons Act 2006, the owner of a green may apply to the Secretary of State for land to be de-registered. If successful, such an application would result in the land no longer being subject to protection as a green.

4.6.2 If the 'release land' is more than 200 square metres in area, an application must be made to register 'replacement land' as a green in its place. (If the release land is smaller than 200 square metres, a proposal for replacement land does not formally need to be included, but DEFRA policy has been to avoid net loss of town and village greens, so it is generally expected that land will be offered in exchange.)

4.6.3 The Secretary of State will take into account the interests of the benefiting local population and the neighbourhood and the wider public interest in nature conservation, public access to green space and other relevant matters.

4.6.4 A non-refundable fee of £4,900 is currently payable for all applications under section 16 to deregister/exchange a village green.

4.7 Who is responsible for maintenance?

4.7.1 Greens in local authority ownership are often managed by the authority under the Open Spaces Act 1906 or by a scheme of regulation under the Commons Act 1899. Where the green is managed by the district Council under the 1899 Act, that Council is under a duty to maintain it.

4.8 Tree planting

4.8.1 If the trees affect use of the green by local people for lawful sports and pastimes this would be a breach. Limited tree planting may therefore be acceptable, but not over the whole of the area as that would interfere with local people's use of the green.

4.9 Community enjoyment

4.9.1 The owner's consent must be sought before any work is done on a village green. An offence under the legislation is only committed where the encroachment or activity is made "*otherwise than with a view to the better enjoyment of the green*". In general the provision of facilities to assist in the enjoyment of recreation such as goal posts, children's playground, seats etc, would not be a breach of legislation.

4.9.2 *Commercial enterprises* - It may be possible in limited circumstances for commercial enterprises to take place on a village/town green if they do not interfere with the rights of local people to use the land for lawful sports and pastimes. This could include football/cricket/golf, clubs or festivals.

4.10 Ineligibility of development land for registration as Village Green

4.10.1 The Land immediately to the north of the Harding’s Pits Door Step Green site currently forms part of a housing allocation (allocation E1.10) in the adopted (2016) Site Allocations and Development Management Policies Plan (SADMPP), which forms part of the Local Plan currently used for planning decisions.



4.10.2 The Commons Act 2006 provides that land will not be eligible for registration as a village green if certain “trigger events” have taken place. **NB** the land can revert to being eligible if a subsequent “terminating event” takes place. The relevant events in this case are:

Trigger Event	Terminating Event
A development plan document (DPD) which identifies the land for potential development is adopted	The DPD is revoked. OR A relevant policy relating to the land is superseded
A draft DPD identifying the land for potential development is published for consultation	The DPD is withdrawn. OR Two years elapse post-consultation

- 4.10.3 As a result, none of the land within the current E1.10 site is eligible to be registered as a village green (because it is within the current Local Plan which has not been revoked or superseded by policy). In addition, none of the land which is within the reduced allocation currently submitted for Examination is eligible (because it has been recently published for consultation).
- 4.10.4 For clarity, it is irrelevant for the purposes of the Commons Act (as amended) that some of the land currently identified for development is under consideration to be excluded from the revised Local Plan: until the Local Plan is revised and adopted, those areas of land are not eligible as Village Green.
- 4.10.5 For further clarity, there is nothing in the Commons Act which provides that the trigger events mechanism doesn't apply equally to landowner applicants (i.e. not just to local community applicants). It would be inconsistent with the purpose of the inclusion of the trigger event mechanism for there to be such a carve-out for landowner applicants.

5 Alternative options

5.1 Local Green Space designation

- 5.1.1 The Local Green Space (**LGS**) designation is an alternative means of protecting land through the Local or Neighbourhood Plan process. However, if through the Local Plan, given the advanced stage of the current draft Local Plan, this will need to be through a future Local Plan, which will be a number of years off.
- 5.1.2 Local communities, or the local authority, can identify green spaces and request or recommend designation. If designated, the LGS will then receive protection equivalent to Green Belt, ruling out new development other than in very special circumstances.
- 5.1.3 Sites may be designated for a variety of reasons, including their setting, nature conservation benefits, or their quietness.
- 5.1.4 This option is intended to empower local communities to protect green spaces of local importance without the need to meet strict statutory criteria.

Process

- 5.1.5 LGS may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city.
- 5.1.6 To qualify as LGS, the land must be reasonably close to the community it serves, demonstrably special to the local community, and local in character. Consideration in the local/neighbourhood plan assessment

will include whether the LGS designation would complement or undermine investment in homes, jobs and other essential services.

5.2 Fields in Trust

5.2.1 The Council has previously worked with Fields in Trust (an independent charity) to dedicate sites in the borough as open spaces in perpetuity, free from development.

5.2.2 The mechanism for achieving this is via a legally-binding Deed of Dedication between the landowner (i.e. the Council) and Fields in Trust. Under the Deed:

- (i) the Council commits to retain the land for use as green space in perpetuity (usually as a public park or playing field). The Deed will set out what can and cannot be done with the site in terms of use.
- (ii) Fields in Trust have the power to allow or prohibit any subsequent development on the dedicated land. (Generally, the only buildings that would be allowed are ancillary to the use of the site as open space or for public recreation, e.g., changing rooms for football pitches.)
- (iii) The Council continues own and manage the dedicated site/sites.

5.2.3 Entering into the Fields in Trust scheme may also enable access to grant funding sources which would not otherwise be accessible.

5.2.4 The following eligibility criteria apply:

- (i) Only freehold land, or leasehold land with at least 99 years to run, can be protected.
- (ii) Sites should normally be at least 0.2ha in size, in order to accommodate recreation. Smaller spaces may be eligible if special value to the local community can be demonstrated.
- (iii) The principal use should be outdoor recreation, sport or play. "Recreation" covers natural and semi-natural nature spaces such as woodland, local nature reserves and country parks.
- (iv) Sites can include buildings or facilities if their use is ancillary to the outdoor space.
- (v) The site must have some form of permanent public access.
- (vi) The general public must have access to at least 50% of the site for at least nine months of the year. If exclusive events/activities taking place on the site exceed that threshold then the site will not be eligible.

Further background

- 5.2.5 Fields in Trust (formerly the National Playing Fields Association) is a British charity that protects parks and green spaces and promotes the cause of accessible spaces for play, sports and recreation in British cities and towns. The charity has a role in the protection of over 2,900 parks, playing fields and nature reserves across the United Kingdom. Further details can be seen at www.fieldsintrust.org.
- 5.2.6 Fields in Trust protect land through a legally binding document known as a Deed of Dedication. The deed is a legal agreement between Fields in Trust and a space's landowner that they will retain it for use as a green space, usually a public park, playing field or recreation ground, in perpetuity. A plaque is installed somewhere on the space to let everyone who uses it know that it is protected in perpetuity.
- 5.2.7 A Deed of Dedication can be used in conjunction with other forms of protection for recreational land, such as covenants, town and village green registration and the planning process. Even if a space already has one of these on it, the Deed will strengthen the protection.
- 5.2.8 Once completed, the restriction within the Deed is registered with the Land Registry, meaning any check that is made on the land will highlight the protection that is on it and prevent disposal without the consent of Fields in Trust.
- 5.2.9 A Deed can either be charitable or non-charitable. If it is the former then both Fields in Trust and charity law will ensure the protection, whilst if it is the latter then Fields in Trust will ensure the protection.
- 5.2.10 The Deed has flexibility built into it. In general, changes to the space which are ancillary to its use - i.e. supporting the primary activities taking place. Anything which is not ancillary to a space's use, such as buildings, commercial leases and changes of use, can be permissible but generally require consent from Fields in Trust. A landowner can seek this consent by making an application through a procedure.
- 5.2.11 The Council has previously worked with Fields in Trust to dedicate open spaces across the borough in recognition of Queen Elizabeth II's Diamond Jubilee. In 2012/13 and 2015/16 the Council dedicated a number of playing fields and open spaces across the Borough as Queen Elizabeth II Fields In Trust to provide a legacy of protected recreation spaces commemorating the Diamond Jubilee. More recent work has involved the Tower Gardens, King's Lynn and the Willows Nature Reserve, Downham in 2018/19.

5.2.12 Current BCKLWN sites covered by a Deed of Dedication with Fields in Trust

2012/13

Gaywood Hall Recreation Ground
The Esplanade Gardens
Hunstanton – Lower and Upper Green
Hunstanton Community Centre
Peck's Field
Parkway
Kettlewell Lane
Lincoln Square
The Howdale
Wootton Park
The Walks
Downham Market Community Centre
Downham Market Memorial Playing Fields

2015/16

River Lane sports pitches, Lynnsport

2018/19

Tower Gardens, King's Lynn
The Willows, Downham Market

6.0 Policy Implications

- 6.1 The designation of the land shaded red on the attached map as a Village Green fits under two of the key priorities of the recently adopted Council Corporate Strategy 2023-2027: Protect our Environment and Support our Communities.
- 6.2 The current stage in the approval of the local plan means that designation of other areas of land owned by the Borough Council as Village Green cannot be progressed at this time. If there is an ambition to extend the Village Green designation further in future this will be subject to a further report to Cabinet.

7. Financial Implications

- 7.1 The Council will need to provide the estimated 20% match funding from the Council's climate change reserve of £6,000 to help facilitate the proposed Community Orchard at Wisbech Road/Harding's Way.
- 7.2 The Beuys's Acorns Project is also seeking funding to help with the set up of the tree installation, and it may be that the organisation/artists will be looking to the Council to contribute. It is understood that initially this could be less than £1,000, however the on-going maintenance and management needs to be considered.

8. Risk Management Implications

- 8.1 It is considered that the Harding's Pits site and the site proposed for the Beuys's Acorns Project have limited development potential and therefore do not represent a loss of potential capital receipts.

9. Personnel Implications

- 9.1 Limited personnel implications

10. Environmental Considerations

- 10.1 If the land is registered as a town/village green it will be subject to the same statutory protection as other town/village greens and local people will have a guaranteed legal right to indulge in sports and pastimes over it on a permanent basis. The land must be kept free from development or other encroachments. That will help protect the green and tree habitat and biodiversity present on the site and the carbon sequestration benefits.

11. Statutory Considerations

- 11.1 The Commons Act 2006 sets out the underlying framework for the creation and registration of village greens. The Commons (Registration of Town or Village Greens) (Interim Arrangements) (England) Regulations 2007 sets out the process to be followed by any applicant seeking to register a village green, and the process to be followed by the Commons Registration Authority.
- 11.2 The Open Spaces Act 1906 and the Commons Act 1899 make provision for the management of village greens, including by a scheme of regulation.
- 11.3 Offences of interfering with a village green exist under section 29 of the Commons Act 1876, together with section 12 of the Inclosure Act 1857.
- 11.4 There is extensive DEFRA guidance and materials are available on the Open Spaces Society Website.

12. Equality Impact Assessment (EIA)

- 12.1 Please see pre-screening report attached.

13. Declarations of Interest / Dispensations Granted

- 13.1 None

14. Background Papers

- 14.1 Open Spaces Society <https://www.oss.org.uk/>
<https://www.oss.org.uk/what-do-we-fight-for/village-greens/>
- 14.2 Government guidance:
<https://www.gov.uk/guidance/town-and-village-greens-how-to-register>
Section 15 of the Commons Act 2006. Guidance notes for the completion of an application for the registration of land as a town or village green outside the pioneer implementation areas. October 2013, DEFRA
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/291277/tvgprotect-faq.pdf
Commons Act 2006, Factsheet 5: Town and Village Greens,
<https://assets.publishing.service.gov.uk/media/5a7f9a0340f0b62305b88234/commonsact-factsheet5.pdf>

Pre-Screening Equality Impact Assessment

Borough Council of
King's Lynn & West Norfolk



Name of policy/service/function	Village Green				
Is this a new or existing policy/service/function?	New				
Brief summary/description of the main aims of the policy/service/function being screened. Please state if this policy/service is rigidly constrained by statutory obligations	Designate as a Village Green the land shaded in red on the map located to the west of Hardings Way				
Question	Answer				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups according to their different protected characteristic, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p>		Positive	Negative	Neutral	Unsure
	Age			x	
	Disability			x	
	Gender			x	
	Gender Re-assignment			x	
	Marriage/civil partnership			x	
	Pregnancy & maternity			x	
	Race			x	
	Religion or belief			x	
	Sexual orientation			x	
	Other (eg low income) health and well being	x			

Question	Answer	Comments
<p>2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?</p>	No	
<p>3. Could this policy/service be perceived as impacting on communities differently?</p>	Yes	Additional green space in South Lynn and protection of that space for the future will positively impact on the local community but will be available for all
<p>4. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?</p>	No	
<p>5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions?</p> <p>If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section</p>	Yes	<p>Actions:</p> <p>Additional green space in South Lynn and protection of that space for the future will positively impact on the local community but will be available for all</p> <p>Actions agreed by EWG member:</p> <p>.....</p>
<p>If 'yes' to questions 2 - 4 a full impact assessment will be required unless comments are provided to explain why this is not felt necessary:</p> <p>Decision agreed by EWG member:</p>		
<p>Assessment completed by:</p> <p>Name</p>	<p>Lorraine Gore</p>	
<p>Job title</p>	<p>Chief Executive</p>	
<p>Date</p>	<p>6 December 2023</p>	

