READING BOROUGH COUNCIL

REPORT BY HEAD OF LEGAL AND DEMOCRATIC SERVICES AND CHIEF VALUER

TO: MAPLEDURHAM PLAYING FIELDS TRUSTEES SUB-COMMITTEE

DATE: 9 JANUARY 2018 AGENDA ITEM: 5

TITLE: MAPLEDURHAM RECREATION GROUND CHARITY - REGULATORY ADVICE

FROM CHARITY COMMISSION

LEAD COUNCILLOR EDWARDS PORTFOLIO: MAPLEDURHAM PLAYING

COUNCILLORS: FIELD

FIELDS CHAIR OF TRUSTEES

SERVICE: TRUSTEE OF CHARITY WARDS: MAPLEDURHAM

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HEAD OF LEGAL AND chris.brooks@reading.gov.uk

DEMOCRATIC SERVICES

1. PURPOSE AND SUMMARY OF REPORT

- 1.1 Further to Minute 4 of the Mapledurham Playing Fields Trustees Sub-Committee's meeting on 21 June 2017, and the report on the outcome of the public consultation exercise elsewhere on today's agenda, this report sets out the regulatory advice provided to the Council as Trustee for the Mapledurham Playing Field and Recreation Ground (the Playing Fields) in respect of making a decision in relation to the future use of the Recreation Ground held by the Council as trustee of the Mapledurham Recreation Ground Charity (registered charity number 304328).
- 1.2 Officers of the Council representing the Sub-Committee, together with the Sub-Committee's external legal advisor Veale Wasbrough Vizards, were invited by the Charity Commission to meet with it in advance of the Sub-Committee considering the outcome of the public consultation exercise and making further decisions in relation to the Charity, in particular a decision in relation to the proposed grant of a lease to the ESFA. This meeting took place on 10 November 2017 at the Charity Commission's headquarters in London.
- 1.3 The Senior Case Worker for the Charity Commission, Alex Young, wrote to Chris Brooks on 20 November 2017, to provide the Sub-Committee with regulatory advice. This letter is at **Appendix A**.
- 1.4 The Charity Commission letter makes clear that it considers the Sub-Committee is not yet in a position to take a decision in relation to the proposed grant of a lease to the ESFA. Further consideration of all of the options open to the Sub-Committee in relation to the future use of the Recreation Ground and the impact of the ESFA proposal is required. This report therefore recommends a process and timetable to prepare a report on the three options open to the Sub-Committee in relation to the future use of the Recreation Ground (being the status quo, the ESFA proposal and the Fit4All proposal made by the Mapledurham Playing Fields Foundation) and an impact assessment of the ESFA proposal against a master plan for the future use of the

Recreation Ground, to inform the Sub-Committee's future decision-making. This is at **Appendix B**.

2. RECOMMENDED ACTION

- 2.1 That the Officers advising the Sub-Committee be instructed:
 - 1) to prepare a "masterplan" for the Recreation Ground which identifies on an indicative basis how the ESFA lease premium could be applied if the ESFA proposal were to be accepted (in line with the Charity Commission's guidance on this); and
 - 2) to prepare an options report which, taking into account the masterplan, enables the Sub-Committee to evaluate the impact of the three options on the amenity value of the Ground for beneficiaries of the Charity.
- 2.2 That with regard to the above, the Officers should:
 - 1) consult with the Mapledurham Playing Fields Management Committee on the outcome of the public consultation exercise, the options report and the masterplan;
 - 2) engage with the ESFA in relation to the master plan, the Community Use Agreement, any section 106 requirements and any planning mitigation;
 - 3) engage with the Caversham Trents Football Club on the level of sports provision and the playing pitch strategy that could be included in the masterplan;
 - 4) engage with the trustees of the Mapledurham Playing Fields Foundation in relation to that part of the options report which addresses the Fit4All proposal;
 - 5) liaise with the Planning Authority in relation to the mitigation required by the Planning Authority and/or Sport England; and
 - 6) engage with such other stakeholders as the Officers may consider appropriate.
- 2.3 That a further meeting of this Sub-Committee be held in February 2018 to consider the masterplan and options report, subject to engaging with the bodies identified above, whose views should be reported to the next meeting of the Sub-Committee.

3. POLICY CONTEXT

3.1 This is set out in the report on the outcome of the public consultation exercise, elsewhere on today's agenda.

4. COMMUNITY ENGAGEMENT AND CONSULTATION

EQUALITY IMPACT ASSESSMENT

These are set out in and attached to the report on the outcome of the public consultation exercise, elsewhere on today's agenda.

REGULATORY ADVICE AND LEGAL IMPLICATIONS.

6.1 The report on the outcome of the public consultation exercise, elsewhere on today's agenda, provides detailed advice on the legal and regulatory context in which the

- Trustee must take a decision, with specific reference to the Charities Act 2011, conflicts of interest, and the obligations of the Sub-Committee as trustees.
- 6.2 The regulatory advice provided by the Charity Commission in their letter of 20 November 2017 (Appendix A), expands on this. It is therefore important that the Sub-Committee reads this letter and is guided by its advice.
- 6.3 The Charity Commission have provided regulatory advice under Section 25(2) of the Charities Act 2011. As stated in the letter, the Charity Commission saw the primary purpose of their meeting with the Trustees to be to examine the decision-making steps taken to date by the Trustee within the context of the Commission's published guidance on decision-making by charity trustees (CC27), which the Sub-Committee has been advised on in previous Officers' reports.
- As a secondary consideration, the letter also rehearses the legal basis under which the Sub-Committee may make a decision to dispose. If the impact of implementing that decision on the Recreation Ground is limited, then the Sub-Committee could rely on Section 6 of the Trusts of Land and Appointment of Trustee Act 1996 to make a disposal. If the net impact was more substantial, then the Sub-Committee would need to secure the Charity Commission's authority to make a disposal through Section 62 of the Charities Act 2011.
- 6.5 The Charity Commission is satisfied that the trusteeship of the Charity has been properly delegated by full Council, through the Policy Committee, to the Sub-Committee. Therefore the Sub-Committee has delegated authority to make a decision on the options referred to above.
- 6.6 The Charity Commission is satisfied that the Trustee has addressed all of the elements of decision-making, in terms of:
 - Identifying and informing itself on factors relevant to making a decision, including holding a detailed public consultation exercise
 - Identifying and not considering factors that are irrelevant
 - Identifying and mitigating potential conflicts of interest
- 6.7 The Charity Commission is satisfied that the Sub-Committee has undertaken a proper process of preparing to make a decision. It is also satisfied that the three options identified above are within the range of decisions a reasonable trustee could take.
- In terms of relevant factors, the Charity Commission has advised that the Trustee needs to carry out further consideration of 'impact' of the options, in order to make a fully informed decision that both recognises and weights relevant factors. This is to establish both whether each option represents a net benefit to the Charity, or has a negative impact (so that the Sub-Committee is able to "weigh" them) and to assess whether the net effect on the use of the land for recreational purposes is so limited in terms of loss of amenity, or represents a net gain in amenity, to enable the Sub-Committee to properly exercise the power available to it under Section 6 of the Trusts of Land and Appointment of Trustees Act 1996.
- 6.9 For the avoidance of doubt, the Charity Commission letter makes clear that this includes the option of disposal to the ESFA, subject to the Sub-Committee gathering further information to inform itself more fully on the impact of this option. The Commission has stated that there would have to be a very significant, and so far unidentified, negative impact from this option to change the conclusion that this appears to be a reasonable option to consider.

- The Charity Commission letter explains in more detail its thinking about the 6.10 consideration of impact. It accepts that the Sub-Committee has identified and is aware of most of the negative impacts associated with the ESFA proposal. Some impacts have still to be quantified as they are contingent on what is put into the Community Use Agreement and its associated heads of terms. The Charity Commission has also identified that the Sub-Committee does not yet have a clear plan for the use of the £1.36M premium for the lease that has been offered by the EFSA. The Charity Commission advise that the Sub-Committee should develop a clear indicative plan based on what it is aiming to achieve, in terms both of tangible facilities and actions and reasonable projections of consequent recreational usage by beneficiaries of the Charity. The Commission advises that this need not equate to a full "business plan", with full costings for implementation, but a scoping exercise to evaluate one, or possible more, set of options for using the premium in terms of the recreational benefits that might be achieved.
- 6.11 In conclusion, the Charity Commission letter states that, at this stage, it cannot offer a view on whether the Trustee is able to rely on Section 6 of the 1996 Act to grant a lease to the ESFA, if that is the decision ultimately taken by the Sub-Committee. If this power cannot be used, then the Sub-Committee would need to apply to the Charity Commission to make a disposal: this would be by means of a scheme under Section 62 of the Charities Act 2011. But the Charity Commission advise that, provided the Sub-Committee has completed the process of decision making to confirm and demonstrate that the ability to implement the ESFA proposal is in the interests of the Charity, then the Commission is likely to give the authority requested.

7. NEXT STEPS

- 7.1 On the basis of the advice contained in the Charity Commission letter, the Sub-Committee is not in a position, at today's meeting, to evaluate the options open to it in relation to the future use of the Ground, nor to evaluate in more detail the impact of the ESFA proposal. In order to put itself in a position to do so will require the work described above and in more detail in the Charity Commission letter.
- 7.2 The impact assessment of the ESFA option will require having a clear understanding of what the Community Use Agreement will entail on a day-to-day basis, including what the Charity would gain and concede; and the use by the Charity of the £1.36M lease premium. These cross-refer to the planning process and the consideration of the outcome of the ESFA planning application by the Planning Applications Committee. In this process, the Sub-Committee is not an advocate but a respondent in the planning process.
- 7.3 To move this process forward, this Sub-Committee is recommended to commission the following further work, to inform its ability to make a decision at a future meeting:
 - 1) Instruct the Officers advising the Sub-Committee:
 - a) to prepare a "masterplan" for the Recreation Ground which identifies on an indicative basis how the ESFA lease premium could be applied if the ESFA proposal were to be accepted (in line with the Charity Commission's guidance on this); and

- b) to prepare an options report which, taking into account the masterplan, enables the Sub-Committee to evaluate the impact of the three options on the amenity value of the Ground for beneficiaries of the Charity.
- 3) With regard to the above, the Officers should also:
 - a) consult with the Mapledurham Playing Fields Management Committee on the outcome of the public consultation exercise, the options report and the masterplan;
 - b) engage with the ESFA in relation to the master plan, the Community Use Agreement, any section 106 requirements and any planning mitigation;
 - c) engage with the Caversham Trents Football Club on the level of sports provision and the playing pitch strategy that could be included in the masterplan;
 - d) engage with the trustees of the Mapledurham Playing Fields Foundation in relation to that part of the options report which addresses the Fit4All proposal;
 - e) liaise with the Planning Authority in relation to the mitigation required by the Planning Authority and/or Sport England; and
 - f) engage with such other stakeholders as the Officers may consider appropriate.
- 7.4 It is also recommended that a further meeting of this Sub-Committee be held in February 2018 to consider the masterplan and options report, subject to engaging with the bodies identified above, whose views should be reported to the next meeting of the Sub-Committee.
- 7.5 The Sub-Committee, having considered the masterplan, options report and any further comments received, may then take a decision on which of the three options offers the greatest net benefit to the beneficiaries of the Charity. If the ESFA proposal is the preferred option, then any decision to this effect would be subject to the outcome of the Planning Committee consideration of the ESFA planning application.
- 7.6 If the ESFA proposal is the preferred option, a further meeting of the Sub-Committee will be held after the ESFA planning application has been determined by the Planning Committee, to review and confirm or change the decision taken under paragraph 7.5 above in the light of the outcome of the planning determination.
- 7.7 With regard to point 3(e) in para. 7.3 above, the ESFA have submitted a draft mitigation strategy to the Planning Authority which sets out a number of mitigations and enhancements which could potentially be carried out by the Sub-Committee in relation to the Ground, presumably funded by the premium received from the ESFA. On behalf of the Trustee, the Planning Authority has been told that, subject to the pitch improvement (mentioned in the heads of terms), the Sub-Committee's discretion to apply the premium to enhance the amenity value of the Ground should not be restricted by any works of mitigation which the Planning Committee decides are required in order to grant planning permission to the ESFA. The Sub-Committee will need to be free to decide whether there is a net benefit in applying the premium, i.e. the extent to which the premium can be used to enhance the amenity value of the Ground over and above any works of mitigation required to offset the loss of amenity value attributable to the grant of the lease.

8. FINANCIAL IMPLICATIONS

These are set out in the report on the outcome of the public consultation exercise, elsewhere on today's agenda. 8.1

10. **BACKGROUND PAPERS**

Appendix A: Letter from Charity Commission, 20 November 2017

Appendix B: Steps and Timetable Charity Commission note of meeting on 10 November 2017



Chris Brooks, Reading Borough Council. Charity Commission PO Box 211 Bootle L20 7YX

by email only

T: 0300 065 1528

Your ref:

Our ref: C-463343

Date: 20 November 2017

Dear Chris.

(MAPLEDURHAM) RECREATION GROUND CHARITY 304328

Thank you for meeting with us to explain the work carried out by the Mapledurham Playing Fields sub-Committee (acting as trustee on delegated authority from Reading Borough Council) to prepare to make a decision in relation to the future use of (the Mapledurham) Recreation Ground Charity.

You explained that there had been delegation of trusteeship from the full Council to the Policy Committee, which had in turn (and under the terms of its own delegated authority) delegated trusteeship to the Mapledurham Playing Fields sub-Committee. **We agreed you would provide us with the two minutes confirming the two delegation decisions.**

The primary purpose of the meeting was to examine the decision making steps taken to date within the framework set out in the Commission's published guidance CC27. A secondary purpose was to consider whether (if a decision were to be made that met the tests set out in CC27) the impact on the Recreation Ground of implementing that decision would be sufficiently limited to enable the trustee to rely on the power in s6 of the Trusts of Land and Appointment of Trustees Act 1996 (if the chosen option required a disposal).

As indicated, we are (in this letter) providing the trustee with regulatory advice, under s15(2) Charities Act 2011. In the present case it is our understanding that no final decision has been made, and it has yet to be determined whether the trustee has power to implement a decision to dispose. If it does not have power the trustee would need to seek formal authority from the Commission, which would be by means of a scheme under s62 and s67 Charities Act 2011

Regulatory advice:

On the basis of the information you supplied at the meeting, supported by written evidence supplied before the meeting, the Commission is satisfied that the trustee has properly addressed all of the following elements of decision making:

- Identifying factors that are relevant to making a decision, and taking steps to inform itself
 fully regarding those factors: please, however, see advice below regarding 'impact'. These
 steps included a detailed consultation, that provided a significant amount of information to
 interested persons, and other steps to inform, and to solicit, and obtain views from, a range
 of bodies and individuals (including holding meetings in public, and publishing many of the
 background papers used by the sub-Committee to inform its consideration);
- Identifying factors that would be irrelevant, and taking steps to ensure they do not form part
 of the consideration by the sub-Committee of which of the available options to implement;
- Identifying potential conflicts of interest, and of loyalty, and taking specific steps to ensure
 these are avoided and/ or mitigated where an individual or group of individuals could not
 properly act, or particularly participate in decisions, in two capacities. This has extended
 not only to individual Councillors, but also to individual Officers of the Council who have
 advised the sub-Committee in relation to the Recreation Ground.

The Commission is satisfied from the information provided that the trustee has actively considered a range of possible options, and evaluated each of them, in order to be in a position to make a decision about which option would best serve the interests of the charity.

The Commission is satisfied that the EFA plan appears to be within the range of decisions a reasonable trustee could take. Although this <u>may</u> require a change of the trusts of the charity to be implemented – particularly to authorise a disposal of some land (see below) the evidence presented demonstrated that a case for that change could reasonably be made to the Commission in terms of the cy pres occasions set out in s62 Charities Act 2011. Some additional information on 'impact' of the EFA option will be required to confirm the benefits of changing the trusts (to enable that option to be implemented, if that is the trustee's decision).

Impact:

You presented a substantial amount of information and evidence concerning the three principal options that the trustee currently has available. Those options included:

- no change at all;
- the Fit4All and WADRA proposals (to the exclusion of the EFA proposal); and
- the EFA proposal (which, because of the terms put forward, would exclude the Fit4All and WADRA proposals, although you were clear that the trustee is amenable to enacting all three proposals alongside one another if that were possible).

You were able to identify likely impacts, both positive and negative, in respect of each option, with a greater or lesser degree of detail. We accepted that to some extent that is inherent in the stage of consideration reached, in that preparing detailed and fully costed proposals (taking account of planning requirements and other factors) would represent a substantial further investment of resource for the charity.

The Commission advised, however, and is now stating as regulatory advice, that the trustee would need to carry out some further consideration of 'impacts' in order to make a fully informed decision that not only recognises relevant factors, but is able to 'weigh' them. This is, in part, in order for the trustee to make a decision on whether each option would represent a net benefit to the charity, or have a negative impact, and partly in order to assess whether the net effect on the use of the land for recreational purposes is such (i.e. is so limited in terms of loss of amenity, or potentially

represents a net gain in amenity) that the trustee could properly exercise the power available to it under s6 Trusts of Land and Appointment of Trustees Act 1996.

More specifically, the Commission accepts that the trustee has identified, and is aware of, most of the negative impacts that would be associated with the EFA plan e.g. the loss of some land to the footprint of the school; a period of disruption during the construction phase etc.). Some of those impacts, however, remain to be quantified as they are contingent on what is put into the Community Use Agreement, and how certain Heads of Terms will translate into restrictions on 'public' use (specifically what land area, and for what periods). Those restrictions will also need some contextual understanding e.g. will restrictions during school hours actually interfere significantly with present use patterns (or projected use patterns if the Pavilion was now in use) if the latter does not overlap with school hours (e.g. is football primarily or exclusively during evenings and weekends?). By the same token the Community Use Agreement may provide additional out of school hours recreational facilities not previously available, and therefore represent a net gain in amenities. The Commission advises that the trustee should seek to reach a more detailed position on these elements of the EFA proposal as part of understanding the net impact it would have on recreational use.

A further net benefit identified from the EFA proposal, and communicated in the consultation, is the prospect of the charity securing £1.36m (as a premium for the lease), and the potential that would give to address recreational provision at the site. The potential to invest, however, is not the same as a clear plan to invest in such provision, with specific and measurable recreational benefits in view. The refurbishment of the Pavilion has been cited as being possible, and the improvement of pitches (allowing for greater use, by overcoming the issues of waterlogging). The 'loss' of two 5 a side pitches (under the footprint of the school in the EFA proposal) would also, possibly, be addressed by a reconfiguration of all the pitches, ensuring no net loss of what is currently the primary recreational offer on the site (junior and senior football). It was suggested, or implied, that a combination of different steps could not only preserve current facilities and levels of use, but serve to improve both.

If the trustee is to make a decision based on a 'benefits' case (weighing negative impacts against positive gains) the Commission advises that the trustee should aim to develop a clear indicative plan based on what it would aim to achieve (and have a clear financial basis to achieve) both in terms of tangible facilities and actions, and on reasonable projections of consequent recreational usage by beneficiaries. This additional work to 'solidify' what the net impact on the charity would be, if the EFA proposal were to be implemented, would not equate to a full business plan, with full costings for implementation. It would instead be a scoping exercise to evaluate one, or possibly more, set of options for using the premium, in terms of recreational benefits that might be achieved.

Conclusion and summary:

The Commission is satisfied, on the evidence it has seen, that the trustee has undertaken a proper process of preparing to make a decision.

All three options would appear to be within the range of options a reasonable trustee could take. For the avoidance of doubt, this includes the EFA option, subject to the gathering of further information (as indicated above) to inform itself more fully on the impact of this option. There

would have to be a very significant, and so far unidentified, negative impact from that option to change the conclusion that it appears to be a reasonable option to consider

Until the assessment of net impact is complete the Commission is not able to offer a view on whether, or not, the Trustee would be able to rely on the powers of disposal under s6 of the Trusts of Land and Appointment of Trustee Act 1996. If it is concluded that the trustee could not proceed under that power, it would require the Commission's authority (by means of a scheme) to make a disposal. The basis for making the scheme would be one or more of the occasions set out in s62 Charities Act 2011. Provided the trustee had completed the process of decision making to confirm, and demonstrate, that the ability to implement the EFA proposal would be in the interests of the charity the Commission is likely to give the authority requested. The Commission is not in a position to make its final decision on a S62/S67 scheme, however, until the trustee's deliberations has been formally concluded, and provided to the Commission for consideration under S61 and S70(2) of the Charities Act 2011.

Yours sincerely

Mr Alex Young (Senior Case Manager – Charity Services)

Mapledurham Recreation Ground Charity

Timetable

	Steps	Responsibility	Timetable
1.	Call Management Committee #1 to (1) report and comment on consultation outcome (to include landscape priorities) and (2) seek their view on preparation of master plan for the ESFA proposal ("Master Plan").	BS, CB	W/b 18 12 17
2.	Call Sub-Committee meeting #1 to (1) report and comment on consultation outcome (2) report and comment on regulatory advice from CC (3) report on correspondence with Planning Committee and (4) propose next steps. Decisions are (1) whether to instruct Officers to prepare evaluation of options ("Options Report"), including Master Plan and (subject to that) (2) to liaise with Planning Committee as appropriate and (3) to liaise with ESFA and other stakeholders (as below). Papers for the meeting are (1) consultation report (2) methodology (including supporting spreadsheet) (3) Officers' report (including heat map, proposals re development of Master Plan and intention to engage with ESFA re planning and landscape from consultation) and (4) CC's regulatory advice dated 20 November 2017.	Officers	w/b 18 12 17
3.	Management Committee meeting #1	BS	w/b 01 01 18
4.	Sub-Committee meeting #1	Officers	w/b 08 01 18
5.	Liaison with Planning Committee	BS	Ongoing from meeting #1 (as above)
6.	Engage with ESFA in relation to Master Plan, mitigation, section 106 aspects and Community Use Agreement ("CUA") (see CC's regulatory advice -"the Commission advises that the trustee should therefore	BS	Ongoing from meeting #1 (as above)

	seek to reach a more detailed position on these elements of the EFSA proposal as part of the understanding the net impact would have on recreational use").		
7.	Engage with CTFC re level of sports provision and playing pitch strategy ("PPS").	BS Subject to PPS info being available	Ongoing from meeting #1 (as above)
8.	Draft Master Plan to be tabled for discussion with CTFC and any other stakeholders.	BS	w/b 22 01 18
9.	Draft Options Report and Master Plan to be tabled for discussion with Management Committee.	BS	w/b 22 01 18
10	Draft Options Report to be tabled for comment by MPFF (in relation to Fit4All proposal only).	СВ, ВТ	w/b 22 01 18
11	Call Management Committee meeting #2 to consider and comment on the Options Report and Master Plan.	BS, CB	w/b 05 02 18
12	Call Sub-Committee meeting #2 to consider Options Report and Master Plan. Decisions are (1) evaluation of the options set out in the Options Report (including the Master Plan as regards the ESFA proposal) to confirm assessment of the net benefit to amenity value of each of them (2) if the ESFA proposal is regarded as conferring the greatest net benefit, to approve the Master Plan and, if so, (3) to instruct Officers to seek the approval of the CC for the grant of the proposed lease to the ESFA. The decision would be <u>subject to</u> the outcome of the Planning Committee decision in relation to the ESFA application (to cater for any further changes required to the Master Plan as a consequence). If the ESFA proposal is preferred, the Sub-Committee could also be asked to (1) instruct Officers to seek to progress discussions with MPFF and (2) to open discussions with Fields in Trust.		w/b 05 02 18

	Papers for the meeting are (1) Officers' report (including report on likely section 106 requirements) (2) Options Report (3) Master Plan and (4) CC's regulatory advice (plus all other key documents e.g. HoT, Bruton Knowles' report etc).		
13	Trustee site visit	Sub-Committee	Prior to Sub- Committee meeting #2
14	Management Committee meeting #2	BS	
15	Sub-Committee meeting #2	Officers	w/b 12 02 18
16	Planning Committee meeting		ТВС
17	Amend Master Plan as necessary to reflect Planning Committee decision.	Officers	After Planning Committee decision issued.
18	Call Management Committee meeting #3 to consider and comment on any changes to the Master Plan etc.	BS	Planning Committee decision plus 1 to 2 weeks.
19	Call Sub-Committee meeting #3 to consider and approve any changes to the Master Plan etc.	Officers	Planning Committee decision plus 1 to 2 weeks.
20	Management Committee meeting #3	Officers	1 week after being called.
21	Sub-Committee meeting #3	Officers	1 week after being called.
22	If the Sub-Committee decide to seek the approval of the CC for the grant of a lease to the ESFA, seek that approval. Documents required are (1) covering letter explaining decision-making process and (2) copies of papers submitted to Sub-Committee meetings #1 to #3.	Officers	Following Sub- Committee meeting #3.