

Polly Dunn

Assistant Town Clerk and
Executive Director of Governance & Member Services



Circulated to the Respondent, Objector, and other interested parties

Date 28 January 2026

Dear Cliona O'Tuama

**Re: City of London Ward Lists – Outcome of hearing
City of London (Various Powers) Act 1957
Representation of the People (England and Wales) Regulations 2001**

I am writing to advise all parties of my decision in relation to the inclusion of Cliona O'Tuama ("the Respondent") in the final Ward List for the Ward of Castle Baynard for 2026 – 2027, trading as 'Cliona O'Tuama Solicitor' at Hamilton House, 1 Temple Avenue, London EC4Y 0HA ("the Premises").

A hearing was held on 22 January 2026 at the Guildhall before me, Polly Dunn, Assistant Town Clerk, under delegated authority from the Town Clerk and Chief Executive. I was assisted by Edward Wood, Assistant City Solicitor and Saira McKechnie, Electoral Services Manager.

In attendance was Martha Grekos ("the Objector"), who had submitted the objection to the inclusion of the Respondent in the provisional Ward List. The Respondent also attended the hearing.

At the outset of the hearing, it was clarified to the Objector that the Respondent did not appear in the provisional Ward List as the appointed voter of a qualifying body, as stated in her objection, but as a sole trader. Therefore, some of the statutory provisions the Objector cited were incorrect, but the substance of her objection remained.

It was not disputed by the Objector that the Respondent was occupying the Premises for relevant purposes on 1 September 2025 (the qualifying date) in accordance with the City of London (Various Powers) Act 1957 ("the 1957 Act").

The main issue to be determined at the hearing was whether the Respondent was occupying the Premises as owner or tenant. This is still a requirement for sole traders, albeit under section 6(1)(a) of the 1957 Act, rather than section 6(1)(c), as was cited in the objection.

The Objector's evidence principally consisted of accounts of conversations with the Respondent and staff at the Premises, which led her to believe that the Respondent was occupying the Premises under a simple licence rather than a lease, which would not satisfy the relevant requirement.

The Objector claimed that all of the businesses at the Premises were in the process of being moved from licences to leases, but that the Respondent had not transitioned yet.

In reply, the Respondent gave evidence that she had in reality had exclusive use of her office at the Premises for 32 years.

The Respondent provided a copy of her non-domestic rates bill at the hearing, but it was not disputed that she was occupying the whole or part of any hereditament (i.e. land or building) with a rateable value of at least £10 in the local non-domestic rating list, as required under section 6(1)(a) of the 1957 Act. As explained at the hearing, each relevant element of the legislation must be individually satisfied, and I do not consider that this materially assists me in determining the nature of the Respondent's occupancy.

The Respondent also helpfully provided a copy of her current occupancy agreement, which was headed 'Agreement for the Supply of Office Facilities'. Having read that document, I consider that it is indicative of a licence for serviced office accommodation rather than a lease conferring exclusive possession. For example, clause 4(a) provides that: -

"The Operator is under no obligation to maintain a particular office for the use of the User and is entitled to require the User to use any similar sized office that the Operator may allocate from time to time in the Building."

Whilst I do not doubt the Respondent's evidence regarding the practical facts of her occupation, the issue is what has been legally granted, and the proper construction of this agreement is that it is a licence.

Accordingly, the Respondent will not be included in the final Ward List for the Ward of Castle Baynard for 2026 – 2027.

There is a right of appeal to the Mayor's and City of London Court in relation to this decision.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Polly', with a long, wavy horizontal line extending to the right.

Polly Dunn
Assistant Town Clerk and
Executive Director of Governance and Member Services