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| <p>Cabinet</p> <p>5 January 2016</p> |  |
| <p>Report of: Director of Development and Renewal</p> | <p>Classification: Unrestricted</p> |
| <p>The Implementation of a New Infrastructure Delivery Framework</p> | |

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| Lead Member | Councillor Rachel Blake, Cabinet Member for Strategic Development |
| Originating Officer(s) | Owen Whalley |
| Wards affected | All |
| Key Decision? | Yes |
| Community Plan Theme | A great place to live |

1. EXECUTIVE SUMMARY

- 1.1 This document has been prepared in order to seek approval from the Mayor in Cabinet in respect of the implementation of a new Infrastructure Delivery Framework (IDF). The IDF is a decision-making governance structure and supporting evidence base proposed to ensure that funding allocation relating to infrastructure delivery is standardised, evidence based and well informed. In addition, this proposal will assist in the delivery of the Mayor's Transparency Protocol. It will use the decision-making structure and evidence base to ensure that infrastructure projects can be appropriately prioritised.
- 1.2 The decision making structure of the IDF will subsume the Planning Contributions Overview Panel (PCOP), which is the body that currently decides how Section 106 monies are spent, and will seek to make decisions in respect of the allocation of the local Community Infrastructure Levy (CIL) and also Section 106 (S106) income.
- 1.3 Approval is sought to implement the new IDF from the beginning of financial year 2016/17. It is proposed that the decision making structure will involve the formation of a new officer-led working group (the 'Infrastructure Delivery Steering Group' (**IDSG**)) which will be chaired by the Corporate Director for Development and Renewal and will be delegated some powers to allocate funding. The officer-led group will feed into a board level group (the 'Infrastructure Delivery Board' (**IDB**)) which will be chaired by the Mayor and will be attended by the membership of Cabinet. The IDB will make recommendations to approve expenditure and decisions will be made by the Mayor in Cabinet.

2. RECOMMENDATIONS

1.4 The Mayor in Cabinet is recommended to:

1. Approve the formation of the decision-making structure as proposed in this document for adoption from the 1st April 2016. More specifically:
 - The formation of an officer level group, the Infrastructure Delivery Steering Group, chaired by the Corporate Director of Development and Renewal;
 - The formation of a board level group, the Infrastructure Delivery Board, chaired by the Mayor which will refer relevant matters to Cabinet via the Cabinet Pre-Agenda Planning Meeting. The relevant matters will not be referred to the Directorate Management Team, the Corporate Management Team or the Mayor's Advisory Board as required under the current Cabinet process.
2. Approve the formation of an evidence base to support decision-making. This evidence base will be finalised and submitted for approval by the IDB and Cabinet once the IDF is implemented;

3. REASONS FOR THE DECISIONS

3.1 There are several reasons for the implementation of a new Infrastructure Delivery Framework:

1. To ensure that decisions relating to the expenditure of the Community Infrastructure Levy (CIL) and Section 106 (S106) funding are the subject of appropriate oversight;
2. To ensure that relevant decisions are appropriately transparent and comply with the aims of the Mayor's Transparency Protocol;
3. To ensure that the delivery of infrastructure in the borough accords with the Council's Best Value objectives;
4. To ensure that the allocation of funding is undertaken on an objective basis and that decisions are as best informed as possible.

4. ALTERNATIVE OPTIONS

4.1 There are two notable alternative options in respect of how to allocate S106 and the local CIL to fund infrastructure projects:

Alternative Option 1: Delegate authority onto PCOP to allocate local CIL in addition to its existing remit to allocate S106

- 4.2 PCOP already allocates S106 funding to infrastructure projects. Its remit could be widened to include the allocation of local CIL.
- 4.3 This option is not considered appropriate as it does not ensure the same levels of transparency or oversight as the proposal set out in this report.

Alternative Option 2: Form a new officer level group which would recommend matters, including projects, for approval at a board level group, removing the need to revert to Cabinet

- 4.4 This option would be similar to the proposed option except that projects would be approved at the board level group, chaired by the Mayor and not be referred to Cabinet for approval.
- 4.5 This option is not considered appropriate as it does not ensure the same levels of transparency or oversight as the proposal set out in this report.

5. BACKGROUND

- 5.1 The following matters should be taken into account when considering the proposals and recommendations set out in this report:

CIL

- 5.2 CIL is a pounds per square metre charge on most new development and must be used to help deliver infrastructure to support the development of the area. It can be used to provide new infrastructure, increase the capacity of existing infrastructure or to repair failing existing infrastructure, if that is necessary to support development.
- 5.3 It is expected that, in the medium to long term, CIL receipts are likely to be broadly consistent with the amounts historically received through S106. CIL is payable on the commencement of planning permissions that are permitted after the 1st April 2015. It generally takes many months for any development to go from permission to commencement and it can take up to three years for larger developments to commence. Therefore, the amount of funding received through CIL in year one is likely to be small and it may take up to three years before a consistent level of funding is received.
- 5.4 Subject to the restrictions set out in paragraph 5.2 above, it is the authority of the Executive to decide how to spend CIL. All expenditure decisions of the Council are the function of the Council's Executive unless regulatory functions require otherwise. There are no regulatory restrictions on CIL or S106 in terms of who decides how these funding sources are spent.

S106

- 5.5 S106 (or planning obligations) is the process by which contributions to mitigate developments are collected. It must be used to mitigate individual developments and spending restrictions usually apply, including to specific localities and to specific types of infrastructure.
- 5.6 S106 is being largely replaced by the Local CIL. However, the Council will continue to receive S106 receipts for a number of years as a result of the future implementation of schemes that were permitted prior to the implementation of the Local CIL. As receipts from CIL increase, receipts from S106 will decrease.
- 5.7 Subject to restrictions within a S106 agreement, it is the authority of the Executive to decide how to spend S106 receipts. The current process for making decisions on the spend of S106 funding is through the Planning Contributions Overview Panel (PCOP), chaired by the Director of Development and Renewal.

Funding for Infrastructure

- 5.8 CIL and S106 will only constitute a small portion of the Council's funding for infrastructure. It is advised that CIL and S106 are only used where other funding sources are not available.
- 5.9 The proposals set out in this report only deal with the allocation and expenditure of S106 and CIL funding although the availability of other sources of funding will still be taken into account in terms of decision making, so the process is well informed.

Spending in Local Areas

- 5.10 Local authorities must allocate a percentage of CIL receipts to spend in areas where development is taking place. This is known as the 'Neighbourhood Portion' and the Council must consult the local community in respect of this expenditure.
- 5.11 Where no Neighbourhood Plan is in place the Neighbourhood Portion equates to 15% of CIL receipts collected from a given area, subject to a cap of £100 per Council Tax dwelling within the given area. Where a Neighbourhood Plan is in place the Neighbourhood Portion equates to 25% of CIL receipts collected from the given area with no cap applicable in respect of Council Tax dwellings.
- 5.12 More information on the matters that the Council must consider in allocating the Neighbourhood Portion can be found in paragraphs 6.24 to 6.31 below.

Key Decisions

- 5.13 It should be noted that the Council's Constitution requires that all 'Key Decisions' are referred to Cabinet for approval, irrespective of the other

decision making the project is the subject of. The processes set out in this report account for that fact.

6. PROPOSAL

The Mechanism for Funding Infrastructure

- 6.1 The mechanism in question will allocate only CIL and S106 funding.
- 6.2 The proposed mechanism incorporates two stages of funding allocation.

Stage 1 – Ring-Fencing CIL Funds

- 6.3 Stage 1 will provide the opportunity to ring-fence a proportion of the overall CIL in to Infrastructure Funds for particular types of infrastructure (e.g. education, parks, etc.). This could be used, for example, to protect funding for a certain Mayoral priority or long term strategic need. S106 funding is already ring-fenced to specific infrastructure types in the legal agreement that secures it. Therefore Stage 1 is not necessary for this funding source.
- 6.4 Decisions to ring-fence CIL in to Infrastructure Funds can be made by the new decision-making structure (see paragraphs 6.8 to 6.23 below) on an annual basis. It is proposed that the decision as to how to split CIL into different funds would be made in the initial meetings following the implementation of the IDF and will generally take place at the beginning of each financial year. There will be an opportunity to amend Infrastructure Funds during the year through an exceptions process should priorities change. Stage 1 will apply to:
 - 1. CIL income collected but not yet allocated;
 - 2. CIL income forecast to be collected in the coming financial year.

Stage 2 – Allocating Funds to Projects

- 6.5 This involves the allocation of funding to individual projects. This process will cover all S106 and CIL funding, whether it has been ring-fenced in to an Infrastructure Fund or not. Infrastructure projects will be recommended by officers who will have used the evidence base (described in paragraphs 6.32 to 6.35 below) to objectively identify the types of project with the greatest need.
- 6.6 Further detail of the funding allocation process will be agreed with the decision-making structure once it has been approved and set-up.
- 6.7 In terms of timing for Stage 2, income will be allocated and spent as soon as possible after collection.

The Decision-Making Structure

6.8 It is proposed that three forums will be involved in the allocation of funding for infrastructure projects; a new officer level forum, a new board level forum and Cabinet (which would be referred to via the Cabinet Pre-Agenda Planning meeting). Please refer to Appendix A which provides an overview of the decision-making structure in a diagrammatical format.

6.9 Please find below some more information relating to the roles of these forums:

The Officer Level Forum: The 'Infrastructure Delivery Steering Group' (IDSG)

6.10 It is recommended that this forum be chaired by the Corporate Director for Development and Renewal.

6.11 It is proposed that this group would comprise of officers from various service areas and the members would be similar to the existing Planning Contributions Overview Panel (PCOP) (the forum that currently makes decisions in respect of the expenditure of S106 funding).

6.12 The Infrastructure Delivery Steering Group's (IDSG) principal role would be to support the new board level forum (see paragraphs 6.17 to 6.21 below). More specifically it would be responsible for:

- Forming the evidence base referred to in paragraphs 6.32 to 6.35 below and referring it to the board level forum for approval;
- Referring Initial Project Proposals and Project Initiation Documents (PIDs) in support of the funding of infrastructure projects to the board level group;
- Collating and reporting income and expenditure information to the board-level group;
- Forming proposals relating to the Neighbourhood Portion and referring them to the board level forum (see paragraphs 6.24 to 6.31 below);
- Monitoring the delivery of funded infrastructure projects and providing updates to the board level forum.

6.13 Given the range and scale of infrastructure projects it is also recommended that this forum is delegated authority to approve the funding of small scale projects by S106/CIL up to a certain value. Approval of such projects will be reported to the both the board level forum and the Mayor in Cabinet. The monetary level of delegated authority will be set by the IDB and Cabinet and can be revisited at any time by the IDB and Cabinet.

6.14 In addition, authority should be delegated to the officer level group to make decisions in respect of the expenditure of S106 contributions in exceptional circumstances where a decision is required quickly to prevent the expiry of the

contributions. Consent from the Mayor, when required, outside the processes proposed in this document, will be sought in these cases.

6.15 It is proposed that this forum would meet once every month.

6.16 All projects that are defined as a 'Key Decision' under the Council's constitution (legal advice would be sought in this regard) would have to be referred to Cabinet for formal approval.

A New Board Level Forum: The 'Infrastructure Delivery Board'

6.17 It is proposed that the Mayor would chair this board on which would sit the following parties:

- The Mayor;
- Cabinet;
- CMT.

6.18 This meeting would accommodate discussion and would also be attended by appropriate members of the IDSG to ensure effective links with this group. The IDB will advise the Mayor in Cabinet in respect of the allocation of CIL and S106 to infrastructure projects. The board would receive Initial Project Proposals and PIDs from the officer level forum to enable this. The Mayor in Cabinet would make the final decisions as to the funding of projects, excepting where the IDSG has been granted delegated authority to approve funding for projects.

6.19 This board would also refer other matters to Cabinet including:

- Annually: The adoption of an evidence base to support decision-making;
- 6 Monthly: The reporting of income and expenditure information relating to CIL and S106 (see paragraphs 6.36 to 6.39 below for more detail in this regard);
- On-going: The approval of the extent of the powers of the IDSG;
- On-going: The approval of proposals relating to the Neighbourhood Portion (see paragraphs 6.24 to 6.31 below);
- On-going: The reporting of monitoring information on the delivery of funded infrastructure.

6.20 It is proposed that this forum would meet every two or three months, although more or less frequent meetings could be arranged if necessary.

6.21 All projects that are defined as a 'Key Decision' under the Council's constitution (legal advice would be sought in this regard) would have to be referred to Cabinet for formal approval.

Cabinet

6.22 All decisions, except for those made by the IDSG under delegated powers, are proposed to be made the Mayor in Cabinet. For completeness, the types of decision will include approval for:

- The allocation of funding to infrastructure projects;
- The adoption of an evidence base to support decision-making;
- Proposals relating to consultation on and expenditure of the Neighbourhood Portion;
- The extent of the powers of the IDSG.

6.23 It is proposed that an expedited Cabinet approval process is established. Decisions to be made in Cabinet would first be referred to the Cabinet Pre-Agenda Planning Meeting (as is the current process). However these decisions would not be referred to DMT, CMT or MAB meetings as the role of these meetings will have been completed through the IDSG and IDB.

The Neighbourhood Portion

6.24 CIL legislation states that a percentage of the Council's CIL income has to be spent at a local level. This is known as the 'Neighbourhood Portion' and, where no Neighbourhood Plan is in place, equates to 15% of CIL receipts collected in an area, subject to a cap of £100 per Council Tax dwelling within that area.

6.25 Where a Neighbourhood Plan is in place the Neighbourhood Portion equates to 25% of CIL receipts collected from the given area, with no cap applicable in respect of Council Tax dwellings. The Council is required to consult the local community and spend the Neighbourhood Portion on its behalf following appropriate consultation.

6.26 In terms of how to administer the Neighbourhood Portion, it is proposed that this will form one of the functions of the decision-making structure proposed in this document. Therefore, definitive plans will be proposed for approval by the IDB and Cabinet once the IDF has been implemented. No decision or approval regarding the Neighbourhood Portion is sought through this report. For information, the following key matters will be taken into consideration when forming a proposal regarding the Neighbourhood Portion:

How to Consult on the Neighbourhood Portion

6.27 The government does not prescribe a specific consultation process for Charging Authorities; it is at the discretion of Charging Authorities to decide how to engage with the local community. The consultation process proposed will account for the Council's Statement of Community Involvement and will consider the frequency, format and range of consultation required. In order to

facilitate consultation it is highly likely that the Council will produce guidance to ensure it is clear how the community will engage in the process.

Who Should be Consulted?

- 6.28 It may be the case that relevant community and amenity groups (which might include Ward and Neighbourhood Forums) will be identified by the Council from their existing records. In addition local Councillors could be asked their view on who is appropriate to consult.

How Areas Should be Defined?

- 6.29 Neither legislation nor guidance defines what constitutes an 'area' for the purposes of grouping and spending CIL receipts. Other Charging Authorities have applied various methods in this regard, including the use of existing areas such as Wards as well as other methods including the agglomeration of existing areas and the creation of new ones. Where a Neighbourhood Plan is in place, it is proposed that the area covered by that plan is used for the purposes of the Neighbourhood Portion.

How Decisions Should be Made?

- 6.30 Funding through the Neighbourhood Portion is an Executive function as with the rest of CIL funding. It will therefore be subject to the same decision-making process as set out in this report, taking into account the results of the consultation undertaken.

- 6.31 Other matters that need to be accounted for include:

- Planning Policy Context It may be the case that projects proposed by the community do not reflect the requirements of the National Planning Policy Framework, London, Local or Community Plan.
- Resource Commitments: It is likely the case that consulting local areas will be a resource intensive exercise for Council officers. It will require skilled consultation officers with expertise in community engagement.
- Managing Expectations: Where different community groups have different priorities it may not be possible to appease all parties all the time.
- Regulatory requirements: These may define what it is appropriate to spend the Neighbourhood Portion on.
- Distribution of Development: There are some areas of the borough where there will be more development than others, generating more CIL funding for certain areas. Consideration will need to be given to where funding is spent compared to where it was collected and in accordance with need and regulatory requirements.

An Evidence Base to Support Decision Making

- 6.32 In order to ensure decision making is informed and objective, it is intended that a comprehensive evidence base be prepared and feed into all relevant decision making forums relating to the delivery of infrastructure, including those that facilitate the delivery of the Capital Programme.
- 6.33 This evidence base would be coordinated by the IDSG and principally formed and updated annually by the Infrastructure Planning Team, with assistance from other service areas. It is envisaged that this evidence base will be a consistent reference point for service providers.
- 6.34 The comprehensive evidence base would be approved for use by Cabinet, via the IDB, on an annual basis. It is proposed that the evidence base will comprise the following:
1. An Infrastructure Need Report: This report would set out information relating to the existing and future supply of and demand for infrastructure, including an in-depth analysis of certain key areas (e.g. Whitechapel, South Quay, the Poplar Riverside Housing Zone). This report would be formed using:
 - An Infrastructure Audit: This will identify and define the capacity of existing infrastructure;
 - The Tower Hamlets Growth Model: This will define the extent of existing and future demand for infrastructure by projecting development, population growth and according infrastructure need in the borough.
 2. A Projects Schedule and Prioritisation Matrix: This will involve collating a list of proposed infrastructure projects and undertaking an objective assessment of the projects to provide a formal basis to recommend infrastructure projects. This will be done by:
 - Consulting relevant service areas and using existing plans and policies, as well as the Infrastructure Need Report set out above, to form a schedule of infrastructure projects proposed to meet the requirements identified in the Infrastructure Need Report.
 - Assessing the proposals in the Projects Schedule against a series of defined criteria, to establish the level of priority given to a project. This will enable the ranking of projects by importance which will help ensure that the most needed and important projects are recommend for funding and delivery. Whilst the functioning of the Prioritisation Matrix will fall under the remit of the decision making structure set out in this report, it is likely to include criteria such as: -
 - Whether there is a statutory requirement to provide the infrastructure;
 - Whether there is a significant and evidence based need for the infrastructure;

- Whether there is an up to date strategy/policy basis for delivering the infrastructure;
- Whether there are other sources of funding available;
- Whether the infrastructure project is likely to attract match funding;
- Other criteria that can be added in due course.

6.35 The structure of the Prioritisation Matrix will be approved by the IDB and Cabinet once the IDF is implemented.

Reporting CIL and S106 Information

6.36 Planned S106 expenditure information is currently reported to Full Council as part of the Capital Programme and Budget Setting Process. It is also the case that this information is reported to Cabinet and the Overview and Scrutiny Committee as part of the Capital Programme quarterly monitoring process.

6.37 The Infrastructure Planning Team is taking steps to ensure that CIL is effectively reported as part of the Capital Programme and Budget Setting Process. It is likely that expenditure and income information (for noting) for CIL will be reported and that S106 income information will also be reported for noting.

6.38 In addition to the reporting requirements set out in paragraphs 6.36 and 6.37 above, it is proposed that further specific reporting of collated CIL and S106 income and expenditure information is reported to Cabinet and the Overview and Scrutiny Committee on a 6 monthly basis. It will be the case that S106 revenue expenditure reporting will be undertaken on an annual basis to account for the extensive process of the assignment of revenue funding to the relevant S106 account.

6.39 Prior to reporting to Cabinet and the Overview and Scrutiny Committee the CIL and S106 would be referred to the IDB for approval to report at these forums.

The Role of the Commissioners

6.40 Intervention by the Secretary of State on the 17th December 2014 required, amongst other things, that the Council's functions in respect of grants will generally need to be exercised by appointed Commissioners, acting jointly or severally.

6.41 There is no strict legal definition of 'grant' but it may be the case that the expenditure of CIL or S106 monies will in some cases constitute a grant. As this is the case, the IDF will account for the need to involve the Commissioners in decision-making as is legally necessary.

7. COMMENTS OF THE CHIEF FINANCE OFFICER

7.1 Following the introduction of the Council's Community Infrastructure Levy charging schedule in April 2015, this report sets out a proposed decision

making process for the allocation of resources generated from both Community Infrastructure Levy (CIL) and Section 106 planning agreements, to take effect from 1 April 2016.

- 7.2 The Community Infrastructure Levy system has replaced elements of the previous Section 106 planning process which still continues in a reduced capacity. The Authority has historically generated substantial resources via the Section 106 system, and this will continue under the CIL, although the first receipts are only now starting to be received based on the adopted charging schedule.
- 7.3 It is proposed that an Infrastructure Delivery Framework (IDF) will be introduced to make decisions in respect of the allocation of the local Community Infrastructure Levy (CIL) and Section 106 income. This will replace the current Planning Contributions Overview Panel format.
- 7.4 The IDF will involve an officer 'Infrastructure Delivery Steering Group' providing recommendations to an 'Infrastructure Delivery Board'. This in turn will propose funding allocations for ultimate approval by the Mayor in Cabinet. Funding recommendations will be made in accordance with Council priorities and will follow a consultation and assessment process as set out in the report. The allocations will need to be incorporated within the Council's budget setting and monitoring processes where appropriate.
- 7.5 The costs associated with the introduction of the proposed IDF mainly relate to officer time and will be met from within existing resources.
- 7.6 In addition to the Council's own CIL, the Borough will continue to be responsible for the collection of the Mayor of London's CIL which came into operation on 1 April 2012. The Mayoral CIL is independent of the Council's CIL requirement and is paid quarterly to the Greater London Authority. It is outside the scope of the proposed IDF arrangements.

8. LEGAL COMMENTS

- 8.1 There are a number of constraints that need to be considered in order for the proposed IDF to be compliant with internal and externally-imposed restrictions.
- 8.2 Restrictions on Spend: In relation to 106 agreements, money must not be allocated for a purpose other than that set out in the agreement itself. In relation to CIL, payments must be spent on infrastructure needed to support the development of the area; and consistently with the Council's adopted list of types of infrastructure spending. The Neighbourhood Allocation of the levy can be spent on a wider range of projects than the rest of the levy, provided that it accords with CIL Regulation 59C projects to "support the development of the local council's area" by funding: the provision, improvement, replacement, operation or maintenance of infrastructure; or anything else that is concerned with addressing the demands that development places on an area.

- 8.3 Decisions: The IDSG is not a decision-making body so the executive decision to make an award of funding will be taken by the Corporate Director for Development and Renewal. Amendments may need to be made to the Director's delegated powers in the Council's constitution and decisions will need to be recorded in writing. The financial limits placed on any approval should be formally recorded when they are first established and as and when they are subsequently amended. As the report acknowledges, some decisions, whether falling within the scope of the IDSG or IDB, will be key decisions because of the amount of money involved, their impact on the area or the extent of public interest generated. These will not be within the decision-making scope of the IDSG or IDB.
- 8.4 Consultation: As the report recognises, none of the processes referred to have any formal consultation requirements attached to them. However, where there is a legitimate expectation that a consultation will be carried out then it should be, and any such consultation should: 1) take place when the proposal is still at a formative stage; 2) include sufficient reasons for the proposal to facilitate informed consideration and response; 3) allow adequate time consideration and response; 4) take into account any representations made.

9. ONE TOWER HAMLETS CONSIDERATIONS

- 9.1 This report deals with the process associated with allocating planning contributions to deliver infrastructure. This process will account for the objectives of One Tower Hamlets and those of the Community Plan and ensure that infrastructure is delivered to help achieve these objectives.
- 9.2 It is hoped that all of the infrastructure projects that will be funded through the process set out in this report will reduce inequality and foster cohesion in the borough.

10. BEST VALUE (BV) IMPLICATIONS

- 10.1 The proposals set out in this document align with the Council's Best Value Duty – the formation of a new decision-making structure represents an improvement in the way the Council's functions are exercised. The proposals have regard to economy, efficiency and effectiveness in that they add a layer of oversight to the allocation of funding collected through planning contributions to deliver infrastructure.

11. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 11.1 The processes proposed in this document will ensure effective oversight in using planning contributions to deliver infrastructure. This will mean that matters such as achieving a sustainable environment will be appropriately accounted for when allocating funding for infrastructure.

12. RISK MANAGEMENT IMPLICATIONS

12.1 The proposals set out in this report seek to add a level of oversight to the allocation of planning contributions to infrastructure projects. This additional oversight will help mitigate against risks such as the misappropriation of funding.

12.2 The proposals in this document also seek to ensure that the allocation of planning contributions to infrastructure projects is better informed. This will help mitigate the risk of funding not being allocated to the most needed infrastructure projects.

13. CRIME AND DISORDER REDUCTION IMPLICATIONS

13.1 The proposals set out in this report will enable the effective delivery of infrastructure using planning contributions. This infrastructure might include projects that will help reduce crime and disorder and decrease anti-social behaviour.

14. SAFEGUARDING IMPLICATIONS

14.1 Not applicable.

Linked Reports, Appendices and Background Documents

Linked Report

- None

Appendices

- Appendix A: Diagram of Decision-Making Structure.

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

- None

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