## **CABINET MEMBER SIGNING**

### Monday, 16th August, 2021, 9.30 am

Members: Councillors John Bevan

### 1. APOLOGIES FOR ABSENCE

To receive any apologies for absence.

### 2. DECLARATIONS OF INTEREST

A member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

- (i) must disclose the interest at the start of the meeting or when the interest becomes apparent, and
- (ii) may not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct

- 3. AWARD OF CONTRACT FOR INTERNAL MAJOR WORKS. (TULL) (PAGES 1 8)
- 4. AWARD OF CONTRACT FOR INTERNAL MAJOR WORKS. (CLARKE) (PAGES 9 16)

### 5. EXCLUSION OF THE PRESS AND PUBLIC

Items 6 & 7 allow for consideration of exempt information in relation to items 3 & 4.

#### TO RESOLVE

That the press and public be excluded from the remainder of the meeting as the items below, contain exempt information, as defined under paragraph 3 and 5, Part 1, schedule 12A of the Local Government Act:

Information relating to the financial or business affairs of any particular person (including the authority holding that information).



Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings

- 6. EXEMPT AWARD OF CONTRACT FOR INTERNAL MAJOR WORKS. (TULL) (PAGES 17 20)
- 7. EXEMPT AWARD OF CONTRACT FOR INTERNAL MAJOR WORKS. (CLARKE) (PAGES 21 24)

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Friday, 06 August 2021

# Agenda Item 3

**Report for:** Cabinet Member Signing

Title: Award of Contract for Internal Major works. (Tull)

Report

authorised by: David Joyce, Director of Housing, Regeneration and Planning

Lead Officer: Kurtis Lee, Director of Asset Management, Homes for

Haringey

Ward(s) affected: Alexandra, Enfield, Fortis Green, Bounds Green, Highgate,

Hornsey, Muswell Hill, Noel Park, Northumberland Park, Tottenham Hale, West Green, White Hart Lane, Woodside

Report for Key/

Non Key Decision: Key decision

### 1 Describe the issue under consideration

- 1.1 This report requests the Cabinet Member's approval for the award of a contract to contractor A (identified in the exempt part of the report) for the sum of £5,606,833.33. This project will conduct internal improvement works to bring 947 dwellings up to the Decent Homes Standard.
- 1.2 The report requests the Cabinet Member's approval for the issue of a letter of intent to the preferred contractor. This is up to the value of, but not exceeding, £560,683.33 which represents 10% of the contract sum. This will enable design work and specialist surveys to be completed, whilst the contract is finalised. An additional contingency sum is also requested in the exempt part of the report.

### 2 Cabinet Member introduction

- 2.1 The proposed works to the dwellings in Alexandra, Enfield, Fortis Green, Bounds Green, Highgate, Hornsey, Muswell Hill, Noel Park, Northumberland Park, Tottenham Hale, West Green, White Hart Lane, and Woodside areas, will bring all homes up to the full Decent Homes Standard. The overall project will contribute towards achieving Haringey Council's objectives to increase the number of homes achieving the Decent Homes Standard across the borough. This will ensure all homes are safe and improve resident satisfaction.
- 2.2 This project contains properties that have been non decent since 2015-16. Homes for Haringey have made the commitment for these properties to be brought up to the Decent Homes Standard (the Haringey Standard) by March 2022.

### 3 Recommendations

3.1 This report request Cabinet Member approval the award of a contract to the preferred contractor C, identified in the exempt appendix A. This will be for



- the renewal of kitchen, bathroom and internal electrics including smoke alarms where required.
- 3.2 The total sum of works will be £5,606,833.33 excluding fees.
- 3.3 For the Cabinet Member to approve the issue of a letter of intent for an amount up to, but not exceeding £560,683.33 that represents 10% of the contract sum.
- For the Cabinet Member to approve the total project cost, including fees of £224,595 and client contingency sum as set out in the exempt report.
- 3.5 For the Cabinet Member to note that £45,000 of the total sum has already been spent on consultant design fee as part of the feasibility works.

### 4 Reasons for decision

- 4.1 A competitive tender was undertaken in conjunction with Haringey Council's Procurement team via the London Construction Programme Major Works Framework (LCP Framework) and processes. This will enable the essential internal works such as the renewal of kitchens, bathrooms, and internal electrics to progress.
- 4.2 The tender process was carried out in accordance with the framework requirements that was based on 40% price and 60% quality.
- 4.3 Based on the tender evaluation it is recommended that the tender is awarded to contractor C. The details of the tender evaluation are outlined in appendix A, the exempt part of this report.
- 4.4 Properties within this project include homes that have been non decent since 2015-16. The project will enable works to commence for properties to be brought up to the Decent Homes Standard.

### 5 Alternative options considered

- 5.1 Alternative routes for tender were considered. This included the option to either use third party industry frameworks or undertake a standalone compliant tender process to deliver the works. Homes for Haringey sought support and advice from Haringey Council's Strategic Procurement team and determined the LCP Framework as being the optimum route to the market. This was because it enabled the tender process to be completely quickly, with assured standards and would meet the social investment requirements of the Council as set out in LCP procurements.
- 5.2 The option of not undertaking this work was also considered. However, it would result in Homes for Haringey not achieving the agreed objectives within the Asset Management Strategy 2020-25 of achieving 100% of homes meeting the Decent Homes Standard by 2025. It would also result in increased repairs costs and potential resident dissatisfaction, due to under investment in their homes.



### 6 Background information

- 6.1 As the landlord, the Council has a statutory and legislative duty to maintain the housing stock to a good state of repair. During the programme, the properties will be surveyed and all necessary works undertaken to ensure the properties meet the Decent Homes Standard. The scope of works to these properties, will include new kitchens and bathrooms, which will be adapted for those with a disability if required and electrical upgrade works. Works will be assessed on a property by property basis and the renewal of components will be based on their age and condition to meet the criteria set out in the Haringey Standard.
- 6.2 Historically, internal works such as replacement kitchens and bathrooms were delivered using our internal repairs service (HRS). Due to number of properties requiring internal works, the decision was made to use a larger contractor in order to increase the proposed delivery numbers.
- 6.3 Homes for Haringey commissioned consultants Ridge and Partners LLP, as the multidisciplinary construction related consultant. The scheme under consideration will be designed, costed and project managed by Ridge in partnership with Homes for Haringey. Works included within this scope include aspects such as validation inspections, kitchen and bathroom designs and ensuring residents have undergone our Covid19 risk assessments.
- 6.4 The project details are as follows: -

Number of dwellings in the project	947 units
Anticipated start on site	November 2021
Anticipated completion	August 2022
Contractor	Details in appendix A (exempt
	report)

6.5 The breakdown of properties are as follows:

Internals Tull	Number of properties
ALEXANDRA	69
BOUNDS GREEN	85
Enfield	1
FORTIS GREEN	11
HIGHGATE	297
HORNSEY	30
MUSWELL HILL	45
NOEL PARK	60
NORTHUMBERLAND PARK	89
TOTTENHAM HALE	126
WEST GREEN	23
WHITE HART LANE	60
WOODSIDE	51
Grand Total	947

### 7 Consultation



- 7.1 Consultation with residents will take place to establish residents' choices and to identify any specific needs. A frequently asked questions (FAQ) sheet will be provided with a new HfH handbook to answer questions that may arise about the works. This will include them choosing the kitchen and bathroom finishes, informing them of timescales for work delivery and getting feedback throughout the process. Homes for Haringey will also provide a dedicated project team including a dedicated Resident Liaison Officer, Project Manager and contract management resources.
- 7.2 The follow up residents' newsletter will update residents about progress and inform them about the appointment and details of the contractor.
- 7.3 Homes for Haringey have devised a safe concept of working for internal works. This will include additional communication for residents including handbooks and safe working on site documentation. Homes for Haringey will also provide a dedicated project team to include a dedicated Resident Liaison Officer, Project Manager and Contract Management resources.

### 8 Leasehold implications

8.1 There are no leaseholders' properties included in this project.

### 9 Conservation areas

9.1 Some of the properties in this project are within conservation areas. However, because the works will be carried out within the internal areas of the dwellings, no conservation area conditions are applicable.

### 10 Contribution to strategic outcomes

- 10.1 This project will help to achieve the Borough Plan Outcome 3: 'We will work together to drive up the quality of housing for everyone'. This will include contributing to delivering the following objectives: -
  - Improve the quality of Haringey's Council housing, including by ensuring that 100% of homes meet the Decent Homes Standard by 2025.
  - Improve residents' satisfaction with the service they receive from Homes for Haringey to be in the top quartile for London (78%) by 2022.
  - Ensure safety in housing of all tenures across the borough, responding to any new regulations as they emerge.
- 10.2 Outcome 3 which comes under the Borough Plan's Housing priority, for which the vision is for safe, stable, and affordable homes for everyone, whatever their circumstances.

Statutory Officers comments (Chief Finance Officer (including procurement), Head of Legal and Governance, Equalities



### 11 Finance

- 11.1 The total value of the contract is £5.83m and this includes a professional fee of £0.23m.
- 11.2 The named contractor was selected following a tender and evaluation process based on price (40%) and quality (60%).
- 11.3 This internal works programme is included in the existing stock budget approved by full council in February 2021.
- 11.4 The cost of this project, including professional fees, is projected to be spent as shown below:

Financial year	Works	Fees	Total
Up to 31/03/2021	£0.00m	£0.05m	£0.05m
2021/2022	£5.60m	£0.18m	£5.78m
Total	£5.60m	£0.23m	£5.83m

- 11.5 Consultants' design fees in the sum of £0.05m have been incurred and spent up to 31/03/21.
- 11.6 The expenditure of £0.05m in 2020/21 was met from the existing stock capital works programme 2020/21 budget.
- 11.7 The remaining projected expenditure of £5.78m is covered in the existing stock capital programme 2020/21-25 MTFS.
- 11.8 No contribution to the cost of the project is expected from leaseholders as no leasehold property is affected.

### 12 Procurement

- 12.1 Procurement endorses the recommendation contained within the report.
- 12.2 The procurement was conducted in line with the Council's Corporate Standing Orders and the Public Contract Regulations.
- 12.3 The contract referred to in the report has been procured under the London Construction Programme Major Works 2019 Framework (the "Framework").
- 12.4 The outcome of the process has delivered the most economically advantageous tender and delivers value for money for the Authority.

### 13 Legal

- 13.1 The Head of Legal and Governance (Monitoring Officer) has been consulted in the preparation of the report.
- 13.2 The contract referred to in the report has been procured under the London Construction Programme Major Works 2019 Framework (the "Framework")



- 13.2 The Framework has been established in accordance with the Public Contracts Regulations 2015.
- 13.3 Pursuant to Contract Standing Order 9.07.1(d) the Cabinet member has authority to approve the award of contracts valued at £500,000 or more.
- 13.4 The Head of Legal and Governance (Monitoring Officer) sees no legal reasons preventing the Cabinet Member from approving the recommendations in the report.

### 14 Equality

- 14.1 The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:-
  - Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
  - Advance equality of opportunity between people who share protected characteristics and people who do not.
  - Foster good relations between people who share those characteristics and people who do not.
- 14.2 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.
- 14.3 The decision will primarily impact residents living in properties managed by Homes for Haringey, a significant number of whom share the protected characteristics. It is notable that BAME people and disabled people are overrepresented relative to the population of Haringey. It is noted that the scope of these works to properties will be adapted if required where residents have disabilities. It is also noted that engagement with residents will take place throughout the process.
- 14.4 Overall, in so far as this decision will support the Borough Plan objective to drive up the quality of housing for everyone this decision can be expected to have a positive equalities impact.
- 14.5 As a body carrying out a public function on behalf of a public authority, the contractor will be required to have due regard for the need to achieve the three aims of the Public Sector Equality Duty, noted above. Arrangements will be in place to monitor the performance of the contractor and ensure that any reasonably possible measures are taken to address any issues that may occur and may have a disproportionate negative impact on any groups who share the protected characteristics. It is also noted that the contractor will follow Covid-19 safe protocols and that this will be monitored by Homes for Haringey.

### 15 Use of appendices



- 15.1 Appendix A: Part A exempt information.
- 16. Local Government (Access to Information) Act 1985
- 16.1 Asset Management Strategy 2020-25 https://www.homesforharingey.org/repairs-and-maintenance/major-works





# Agenda Item 4

**Report for:** Cabinet Member Signing

**Title:** Award of Contract for Internal Major works. (Clarke)

Report

authorised by: David Joyce, Director of Housing, Regeneration and Planning

**Lead Officer:** Kurtis Lee, Director of Asset Management, Homes for

Haringey

Ward(s) affected: Bruce Grove, Crouch End, Haringey, Seven Sisters, St Ann's,

Stroud Green, Tottenham Green

Report for Key/

Non Key Decision: Key decision

### 1 Describe the issue under consideration

- 1.1 This report requests Cabinet Member approval for the award of a contract to contractor C (identified in the exempt part of the report) to carry out internal improvement works to 929 dwellings to bring them up to the Decent Homes Standard. The contract award value will be for the sum £5,448,076.81.
- 1.2 The report requests the Cabinet Member's approval for the issue of a letter of intent to the preferred contractor. This is up to the value of, but not exceeding, £544,807.68. This represents 10% of the contract sum. This will enable design work and specialist surveys to be completed, whilst the contract is finalised.

### 2 Cabinet Member introduction

- 2.1 The proposed works to the dwellings in Bruce Grove, Crouch End, Haringey, Seven Sisters, St Ann's, Stroud Green, and Tottenham Green areas, will bring all homes up to the full Decent Homes Standard. The overall project will contribute towards achieving Haringey Council's objectives to increase the number of homes achieving the Decent Homes Standard across the borough. This will ensure all homes are safe and improve resident satisfaction.
- 2.2 The overall population of these wards mirrors that seen in Haringey more widely. Households in areas like Bounds Green are more likely to be rented by social housing tenants than the average within the borough. However, areas such as Stroud Green have a smaller proportion of social housing tenants and a slightly larger proportion of owner/occupier here. The wards in this area have a mixture of high-rise blocks and non-traditional dwellings.
- 2.3 This project contains properties that have been non decent since 2015-16. Homes for Haringey have made the commitment for these properties to be



brought up to the Decent Homes Standard (the Haringey Standard) by March 2022.

### 3 Recommendations

- 3.1 Pursuant to the Council's Contract Standing Order (CSO) 9.07.1(d), for the Cabinet Member to approve the award of a contract to the preferred contractor identified in the exempt appendix A for the renewal of kitchen, bathroom and internal electrics including smoke alarms, rewires etc.
- 3.2 Works programmed will be conducted in Bruce Grove, Crouch End, Haringey, Seven Sisters, St Ann's, Stroud Green, and Tottenham Green areas. The total sum of works will be £5,448,076.81.
- 3.3 For the Cabinet Member to approve the issue of a letter of intent for an amount up to, but not exceeding £544,807.68, that represents 10% of the contract sum.
- 3.4 For the Cabinet Member to approve the total project costs, including fees of £218,236 and client contingency sum as set out in the exempt part of the report.
- 3.5 For the Cabinet Member to note that £45,000 of the total sum has already been spent on consultant design fee as part of the feasibility works.

### 4 Reasons for decision

- 4.1 Homes for Haringey requires Cabinet approval to award the contract for internal works to 927 dwellings in the Bruce Grove, Crouch End, Haringey, Seven Sisters, St Ann's, Stroud Green, and Tottenham Green areas. This will enable the essential internal works such as the renewal of kitchens, bathrooms, and internal electrics to progress. This is following a competitive mini competition in conjunction with Haringey Council's Procurement team via the London Construction Programme Major Works framework (LCP Framework) and processes.
- 4.2 The tender process was carried out in accordance with the LCP Framework requirements that was based on 40% price and 60% quality.
- 4.3 Based on the tender evaluation it is recommended that the tender is awarded to contractor C. The details of the tender evaluation are outlined in appendix A, the exempt part of this report.
- 4.4 Properties within this project include homes that have been non decent since 2015-16. The project will enable works to commence for properties to be brought up to the Decent Homes Standard.

### 5 Alternative options considered

5.1 An alternative option would be for Homes for Haringey to either use third party industry frameworks or a stand-alone OJEU compliant tender process



to deliver the works. Homes for Haringey sought support and advice from Haringey Council's Strategic Procurement and determined the LCP Framework as being the optimum route to the market. This considered aspects such as the speed of access to quality-checked contractors and focus on companies that concentrate their resources in the local area.

5.2 The option of not undertaking this work was also considered. However, it would result in Homes for Haringey not achieving the agreed objectives within the Asset Management Strategy 2020-25 of achieving 100% of homes meeting the Decent Homes Standard by 2025. It would also result in increased repairs costs and potential resident dissatisfaction, due to under investment in their homes.

### 6 Background information

- 6.1 As the Landlord, the Council has a statutory and legislative duty to maintain the housing stock to a good state of repair. To ensure best value this procurement was undertaken as lots with the Clarke interiors contract. During the programme, the properties will be surveyed, and all necessary works undertaken to ensure the properties meet the Decent Homes Standard. The scope of works to these properties, where applicable will include internal refurbishment of kitchens, bathrooms (and where required adaptations), electrical upgrade works, asbestos survey and where applicable removal works.
- 6.2 Historically, internal works such as replacement kitchens and bathrooms were delivered using our internal repairs service (HRS). Due to number of properties requiring internal works, the decision was made to use a larger contractor in order to increase the proposed delivery numbers.
- 6.3 Homes for Haringey commissioned consultants Ridge and Partners LLP, as the multidisciplinary construction related consultant. The scheme under consideration will be designed, costed and project managed by Ridge in partnership with Homes for Haringey. Works included within this scope include aspects such as validation inspections, kitchen and bathroom designs and ensuring residents have undergone our Covid19 risk assessments.
- 6.4 The project details are as follows: -

Number of dwellings in the project	929 units	
Anticipated start on site	November 2021	
Anticipated completion	August 2022	
Contractor	Details in appendix A (exempt	
	report)	

6.5 The breakdown of properties are as follows:



Internals Clarke	Number of properties
BRUCE GROVE	48
CROUCH END	77
HARRINGAY	45
HORNSEY	1
SEVEN SISTERS	68
ST ANNS	220
STROUD GREEN	289
TOTTENHAM GREEN	179
WEST GREEN	2
<b>Grand Total</b>	929

### 7 Consultation

- 7.1 Consultation with residents will take place to establish residents' choices and to identify any specific needs. A frequently asked questions (FAQ) sheet will be provided with a new HfH handbook to answer questions that may arise about the works. This will include them choosing the kitchen and bathroom finishes, informing them of timescales for work delivery and getting feedback throughout the process. Homes for Haringey will also provide a dedicated project team including a dedicated Resident Liaison Officer, Project Manager and contract management resources.
- 7.2 The follow up residents' newsletter will update residents about progress and inform them about the appointment and details of the contractor.
- 7.3 Homes for Haringey have devised a safe concept of working for internal works. This will include additional communication for residents including handbooks and safe working on site documentation. Homes for Haringey will also provide a dedicated project team to include a dedicated Resident Liaison Officer, Project Manager and Contract Management resources.

### 8 Leasehold implications

8.1 There are no leaseholders' properties included in this project.

#### 9 Conservation areas

9.1 Some of the properties in this project are within conservation areas. However, because the works will be carried out within the internal areas of the dwellings, no conservation area conditions are applicable.

### 10 Contribution to strategic outcomes

10.1 This project will help to achieve the Borough Plan Outcome 3: 'We will work together to drive up the quality of housing for everyone'. This will include contributing to delivering the following objectives: -



- Improve the quality of Haringey's Council housing, including by ensuring that 100% of homes meet the Decent Homes Standard by 2025.
- Improve residents' satisfaction with the service they receive from Homes for Haringey to be in the top quartile for London (78%) by 2022.
- Ensure safety in housing of all tenures across the borough, responding to any new regulations as they emerge.
- 10.2 Outcome 3 which comes under the Borough Plan's Housing priority, for which the vision is for safe, stable, and affordable home for everyone, whatever their circumstances.

Statutory Officers comments (Chief Finance Officer (including procurement), Head of Legal and Governance, Equalities)

### 11 Finance

- 11.1 The total value of the contract is £5.67m and this includes a professional fee of £0.22m.
- 11.2 The named contractor was selected following a tender and evaluation process based on price (40%) and quality (60%).
- 11.3 This internal works programme is included in the existing stock budget approved by full council in February 2021.
- 11.4 The cost of this project, including professional fees, is projected to be spent as shown below:-

Financial year	Works	Fees	Total
Up to 31/03/2021	£0.00m	£0.05m	£0.05m
2021/2022	£5.45m	£0.17m	£5.62m
Total	£5.45m	£0.22m	£5.67m

- 11.5 Consultants' design fees in the sum of £0.05m have been incurred and spent up to 31/03/21.
- 11.6 The expenditure of £0.05m in 2020/21 was met from the existing stock capital works programme 2020/21 budget.
- 11.7 The remaining projected expenditure of £5.62m is covered in the existing stock capital programme 2020/21-25 MTFS.
- 11.8 No contribution to the cost of the project is expected from leaseholders as no leasehold property is affected.

### 12 Procurement

12.1 Procurement endorses the recommendation contained within the report.



- 12.2 The procurement was conducted in line with the Authority's Corporate Standing Orders and the Public Contract Regulations.
- 12.3 The contract referred to in the report has been procured under the London Construction Programme Major Works 2019 Framework (the "Framework")
- 12.4 The outcome of the process has delivered the most economically advantageous tender and delivers value for money for the Authority.

### 13 Legal

- 13.1 The Head of Legal and Governance (Monitoring Officer) has been consulted in the preparation of the report.
- 13.2 The contract referred to in the report has been procured under the London Construction Programme Major Works 2019 Framework (the "Framework")
- 13.2 The Framework has been established in accordance with the Public Contracts Regulations 2015.
- 13.3 Pursuant to Contract Standing Order 9.07.1(d) the Cabinet has authority to approve the award of contracts valued at £500,000 or more.
- 13.4 The Head of Legal and Governance (Monitoring Officer) sees no legal reasons preventing the Cabinet from approving the recommendations in the report.

### 14 Equality

- 14.1 The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:
  - Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
  - Advance equality of opportunity between people who share protected characteristics and people who do not.
  - Foster good relations between people who share those characteristics and people who do not.
- 14.2 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex, and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.
- 14.3 The decision will primarily impact residents living in properties managed by Homes for Haringey, a significant number of whom share the protected characteristics. It is notable that BAME people and disabled people are overrepresented relative to the population of Haringey. It is noted that the scope of these works to properties will be adapted if required where



- residents have disabilities and that engagement with residents will take place to identify any specific needs.
- 14.4 Overall, in so far as this decision will support the Borough Plan objective to drive up the quality of housing for everyone this decision can be expected to have a positive equalities impact.
- 14.5 As a body carrying out a public function on behalf of a public authority, the contractor will be required to have due regard for the need to achieve the three aims of the Public Sector Equality Duty, noted above. Arrangements will be in place to monitor the performance of the contractor and ensure that any reasonably possible measures are taken to address any issues that may occur and may have a disproportionate negative impact on any groups who share the protected characteristics.
- 15 Use of appendices
- 15.1 Appendix A: Part A exempt information.
- 16. Local Government (Access to Information) Act 1985
- 16.1 Asset Management Strategy 2020-25

https://www.homesforharingey.org/repairs-and-maintenance/major-works





Agenda Item 6

By virtue of paragraph(s) 3, 5 of Part 1 of Schedule 12A of the Local Government Act 1972.

Document is exempt



Agenda Item 7

By virtue of paragraph(s) 3, 5 of Part 1 of Schedule 12A of the Local Government Act 1972.

Document is exempt

