



Office of the
Deputy Prime Minister

Creating sustainable communities

Delivering Delegation



Local Government Association



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March 2004

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Office of the Deputy Prime Minister: London

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Foreword



I am pleased to endorse the Local Government Association's Guide to Delegation schemes.

This review is both timely and welcome given our planning reform programme and its dependence for success on robust and effective processes.

Earlier National Planning Forum publications have stressed the value of delegation schemes in improving performance and customer service. We continue to commend their use. Making the best use of delegated powers has been identified by the Audit Commission as one of a number of ways to reduce delays in making decisions on planning applications without compromising the quality of those decisions. Indeed, I firmly believe a good scheme of delegation is integral to reconciling democratic accountability with the need to deliver speedy development control decisions and its importance should not be underestimated.

Maximising the number of decisions made under delegated powers allows councillors to focus on those applications that require additional scrutiny and where they can add value in balancing conflicting pressures. Delegating individual planning decisions to officers has made a major contribution to ensuring the appropriate allocation of resources when dealing with certain types of application and improving the effective and timely processing of planning applications.

This document draws on the experience of a wide range of planning stakeholders identifying the key elements of a delegation framework. I hope to see more councils adopting its principles.

Keith Hill;
Minister of State, Office of the Deputy Prime Minister

Most councils now operate delegation schemes. Well constructed and operated arrangements allow the effective and speedy processing of the vast majority of non-contentious planning applications and proper democratic input to those of greater complexity, sensitivity and local significance.



Delegation schemes exist in a variety of formats and with varying degrees of scope – from the simple ‘by exception’ (where all applications are determined by officers unless there are substantive reasons why this should not be the case) to the more comprehensively prescribed approach (where all the cases where applications are to be determined by officers are listed).

The LGA and POS favours moving towards a more widely adopted ‘by exception’ approach where only applications that cannot be determined by officers are determined by committee. We wish to see councillors accepting the principle of decision making only in such cases. The guidance below includes sections on policy/customer focus/process and procedures and performance measurement. Taken together the guidelines set out here are intended to help authorities wishing to improve their performance in this area and to deliver an effective and transparent processing of their applications.

A handwritten signature in black ink, appearing to read 'Susie Kemp', with a horizontal line underneath.

Susie Kemp;
Chairman LGA Planning Executive

1. Delegation in practice

(a) What delegation is

Delegation is a chief or designated officer taking executive action on behalf of the council, and determining planning applications and related matters, in accordance with clearly stated and published rules. The legal basis for delegation is Section 101 of the Local Government Act 1972, as amended. Section 100 (G) (2) requires that a list of powers exercisable by officers should be maintained and open to public inspection. Elected Members determine the basis on which a delegated agreement operates, the level of member involvement and the circumstances in which an officer's delegated power to make a decision may not be exercised.

While acknowledged as promoting 'good practice', delegation agreements vary between local planning authorities. A variety of schemes exist to allow local discretion in their implementation reflecting the diverse nature of local planning authorities and their individual decision making arrangements. All schemes will fall between the extremes of the two examples below;

- All matters being delegated to an officer, with exceptions being defined, the 'by exception' approach (as adopted by for example Birmingham)
- The delegated power being prescribed in terms of type of application and circumstances which must exist for the power to be exercised.

The LGA recognises the need to provide for local discretion in the drafting and operation of delegation agreements and has decided the production of a national code of practice would be too prescriptive an approach. A simple model agreement based on the 'by exception' approach is however set out at **Appendix 1**, with examples of how the model might be modified to reflect local discretion at

Appendix 2. Schemes which lean towards the 'by exception' approach are more likely to provide greater flexibility and clarity of understanding. The LGA recommends that all councils should review their arrangements in light of the benefits offered by the 'by exception model'. This approach is also strongly supported by the Planning Officers Society.

(b) Advantages of a Scheme of Delegation

Delegation has benefits for all stakeholders in terms of simplifying procedures, minimising costs and freeing up Committee members to concentrate on major or controversial cases. Where there is no need to await a committee decision, up to four weeks can be saved in dealing with a planning application. Delegation is a positive process that gives benefits not just in terms of streamlining internal procedures but also in terms of improved responsiveness for applicants.

Delegation:

- simplifies procedures and speeds up process;
- minimises costs and improves service delivery within budgetary limits;
- releases officer resources to focus on other equally important areas of work to achieve service improvement;
- eases lengthy unmanageable committees and reforms committee practice;
- removes applications which illicit no member discussion and evaluation at committee;

- clarifies the current system and protects member involvement;
- increases officer performance and quality;
- is in line with a Plan- led system;
- is best practice.

Delegation is not:

- a process designed to transfer power from elected members to officers;
- a method to dilute the transparency of the Development Control process.

(c) How a Delegation Scheme works

Many schemes of delegation follow the format below:

Members receive details of each new planning application, commonly in the form of a list circulated on a weekly basis.

This list identifies whether an application is within a delegated category, and provides contact details for the officer dealing with the application. A deadline is set, often 21 days, within which a member has the opportunity to express the view as to whether or not an application should go to Committee. It is advisable for this to be done in writing, identifying any specific areas of concern. This will allow the case officer to consider any points of concern and respond to the Member, possibly satisfying the points raised and therefore obviating the need for referral of the application to Committee.

If, within the specified period, a Member expresses a view, this should be taken into account by the relevant officer. If an application is to be delegated and there is a contrary expression of view, it should not automatically mean however that the application should be referred to committee.

In district councils and some Unitary councils, the lists of relevant applications are also issued to Parish/Town Councils as consultation. The Council may need to consider whether it wishes to accord the Parish/Town Council view the same status as that expressed by a District or unitary Councillor, as regards requiring a particular application to be reported to Committee for decision.

The Council also needs to determine the weight given in the delegation process to the views expressed by statutory consultees, non-statutory consultees (eg other Council departments), third parties (eg local MPs) and other members of the public (bearing in mind that consultee views leading to a report to committee will slow the process). In some delegation schemes, any expression of view which runs counter to the officer's conclusion means that an application goes to Committee for decision.

The power delegated to an officer is a *discretion* to determine an application. Officers apply common-sense and their knowledge of Member/Committee interests in deciding whether to exercise the discretion in individual cases. Procedure guidelines should make it clear that the exercise of a delegated power should be by an officer other than the Case Officer. In some cases final authorisation requires a signature of a second officer prior to decisions being made. These procedures ensure that no suspicion of impropriety can arise.

Officers will discuss Members' views which relate to non-planning issues or which contradict the Development Plan or other planning policy, in order to assist Members to exercise their power of referral in the most effective fashion;

Decisions taken are reported regularly to Committee for monitoring purposes, and (by district councils) to Parish/Town Councils, for information.

As a result of this process, Members are able to exercise proper control over the delegation agreement. They are able to ensure that officers deal only with those applications which do not run counter to the views of Councillors, and to any other consultee bodies. They are able to ensure that officers deal with only those applications which the committee would be content to delegate to them for decision and only then, in accordance with the approved plans and policies of the authority.

2. The well constructed Delegation Agreement

(a) A preferred approach

Delegation agreements necessarily vary between local planning authorities. Two broad models exist. The first exemplified by Birmingham or the Poole model (described at **Appendix 1**) includes the prescription **that all applications may be deemed as determined under delegated powers – unless they fall into defined exceptional categories**. The second broad approach **lists all those areas where the delegated powers apply**.

All schemes will fall between these extremes and even within these models there are variations as to what determines an exemption to delegation. Some councils may use the value of the fee involved as a proxy of the importance of the application, the site area, or a variety or combination of other factors – objections, local sensitivity or origin of the application.

The LGA favours an approach that adopts the principles of simplicity, ease of understanding by both users, applicants/agents and interested parties alike and a logical approach. The ‘by exception’ model offers these benefits and has the advantage of being easily adapted to suit local conditions.

(b) A recommended framework

The POS has assembled a series of key points for demonstrating transparency, probity, fairness and consistency in decision-making. (Planning Officers Society – Excellence Matrix (Checklist for a successful Scheme of Delegation)). These are identified under headings of policy/customer focus/process and

procedures/performance measurement and outcomes. Each is detailed below. Whichever model is adopted, following the guidance on good practice set out here confirms the council's commitment to delivering an effective delegation process.

Policy

- Decisions made, whether by committee or by officers under delegated powers, are consistent and in accordance with the relevant section of the Town and Country Planning Act.
- A Code of Conduct for Officers/Members is in place to ensure both have an up-to-date understanding of their roles and responsibilities in decision-making.
- There is a clear and appropriate schedule of delegated powers and protocol for referral of applications, planning briefs and supplementary guidance to committee, cabinet or full council as appropriate.
- Clear and published policies are in place relating to how the public can expect to be treated and there is a regular process for updates on probity issues.
- Clear and published policies set out how and when reports are available to the public.

Customer focus

- The Code of Conduct for Officers and Members is made available to the public.
- The scheme of delegation to officers and referral to committee is clear and transparent to users, staff and councilors.

- There are opportunities to address the Planning Committee with all interested parties notified and made aware of their role at the meeting and the likely format of the meeting.
- Clear reports with supporting plans are widely available in advance of committee meetings with unambiguous officer recommendations.
- Reports are available in different languages/media to reflect local needs.
- Clear committee procedures are in place and widely publicised, including information leaflets available to the public outlining the Planning Committee process and how it is managed.
- There are clear presentation methods at committee, which maximize the use of IT.
- Provision for applicants/agents to amend proposals and/or submit additional information up until the pre-determined cut-off point.
- Information is produced and disseminated on what stakeholders can expect and their role in the decision making process.

Process and procedures

- Defines and clarifies relationships between Cabinet, Executive/Overview + Scrutiny Committees/Panels and the Planning Committee and officers within the context of the new local government decision-making arrangements, including protocols for officers serving both Cabinet and Overview and Scrutiny Committee/Panel, and delegation levels.
- Procedures and protocols clarify the different levels of responsibility and legitimacy of member roles in decision-making, including the distinction between planning committee members, area committees and ward members.
- Defines procedures for both delegation of decisions to officers and referral from officers to committee.

- The code of conduct includes information on processes and procedures, such as dealing with correspondence, lobbying, meetings with applicants, overturning the officer recommendations and conduct on committee site visits.
- Mandatory and regular training programmes for members on the Code of Conduct are in place, supplemented by training on the development management process, new legislation, procedures etc.
- Officers have formal access to brief members on new emerging issues and for pre-committee briefings in order to identify outstanding issues.
- All staff are aware of probity issues.

Performance measurement

- Review systems are in place to evaluate the outcome of decisions made by officers and Committee, including those not in accordance with the recommendation.
- Ethnic monitoring of decisions, where appropriate, is undertaken in consultation with under represented groups.
- Includes public and member feedback on reports and committee processes in monitoring procedures.
- Customer surveys are regularly undertaken to test the perceptions of fairness and transparency in decision making.
- Carries out an internal audit.

- Regular reports are presented to Members advising them of key performance results: eg numbers of applications received and determined, percentage determined in eight weeks, appeal decisions, S106 agreements, information on enforcement and tree matters, complaints and outcomes, consistency of decisions, performance against locally set targets and comparison with other authorities.

Outcomes

- Level of delegation above 90% (or as modified in policy).
- Customer surveys show that stakeholders perceive that decision-making is fair, transparent and in accordance with the scheme of delegation and referral.
- There are no challenges or cases referred to the Standards Committee.
- There are no successful Ombudsman cases regarding this issue.
- Low proportion of successful appeals.
- Fewer costs have been awarded against the Council.

3. Other Considerations

(a) When to refer applications

Many systems operate on the basis that no delegated decision can be taken contrary to views expressed by parish councils and amenity societies. This achieves their confidence but at the cost of uncertainty as to timing and other inefficiencies.

Not all applications with objections need to go automatically to committee but it is important that a balance is struck between the need to achieve speedy delivery of decisions and effective process and the public's desire to see significant applications aired at committee.

When the LGA last undertook a telephone survey of London boroughs – it found that 25% of those contacted still automatically referred cases with objections to committee. If targets of delegation and speed of processing are to be met – this figure needs to be reduced. The presumption of automatic referral rather than delegation of applications with objections should be continually challenged. LGA and POS support the limitation of applications called in or referred because of objections to those with substantive justification. It is quality rather than quantity of objections that should support referral to committee. However, where a member insists that an application should be discussed at committee, where there is a fine balance to be struck between competing interests or a contentious case local people would expect to see representation of their views and discussion at committee and the delegation system needs to be adequately sensitive to this and be adequately flexible to adapt to circumstances.

(b) The member interface

The role of members in arbitrating between competing arguments is crucial to the democratic process. Yet if the system is to work effectively there must be proper

administrative distinction between the mundane and the controversial. An effective scheme of delegation will ensure economical use of time and allow focus on the more complex or contentious applications. In the context of the restructuring of the traditional committee system however councillors may feel understandably threatened by the removal of their involvement in a system which can directly affect their constituents. Some councillors have expressed concerns that delegated applications may remove their opportunity to ensure that council policies in areas such as sustainability are adequately reflected in decisions. It will be important that schemes are regularly reviewed so that members concerns in these areas can be picked up.

Yet, elected members remain in complete control of the delegation process – they decide the council’s development plan policies within which all applications are judged. They determine other council policies, standards and guidance within which context applications may be considered. They also determine the terms upon which a delegation agreement operates, the level of member involvement and the circumstances in which an officer’s designated power to make a decision may not be exercised.

In order for targets of effective processing to be achieved, and a basis established for greater freedom and flexibility, a shift in attitude will be central. Councils must be able to demonstrate that delegation is accepted as the procedural rule rather than the exception.

To ensure clarity in understanding respective roles and remits within a delegation scheme, some principles are outlined here

- Rules for Member involvement should be strictly defined and adhered to.
- In some authorities telephone views may be reported to Committee but if the council’s delegation scheme says that Members have to submit written comments – telephone calls should not be acceptable.
- Member informal involvement to be encouraged via mechanisms such as the panels described in the good practice case study included here. Similarly some councils operate a system where a list of applications is circulated and

members are invited to contact officers to discuss contentious applications.

- Delegated decisions to be explained to all concerned: letters to consultees to explain reasons for any decisions against their views.
- Applicants and objectors to be encouraged to meet case officers to express their views. This assists in transparency and helps to meet Article 6 of the declaration of human rights. It also cuts down the time consuming meetings between case officers and objectors.
- Scope of scheme of delegation to be as objective as possible. The requirement to refer to Committee any application of 'more than local significance' is too vague.
- While some councils do not encourage filtering of decisions by members that disagree with those of officers, LGA and POS support measures to filter call-in requests through a Member panel to take out the clear cases of lobbying pressure. Alternatively, if the planning committee is inclined to favour the view of the Ward Member against the officer recommendation, the matter should be open to a referring back, or referring elsewhere arrangement.
- To meet members concerns about applications 'slipping through the net' where decisions made by officers might not accord with the views of members, some authorities have set up a Planning Scrutiny Committee. This is seen as an effective way to review the working of a delegation scheme by periodically monitoring a sample of delegated decisions retrospectively.
- It is up to members to decide whether they have an interest in an application and to step down from voting, but the Codes of practice should include provision that if a member has been lobbied that member should be barred from getting the application to committee. However this ruling does need to take into account that there are a great many single member wards where the ward member may also be a member of the planning committee.
- There should be a system of notifying decisions to Councillors, preferably as information circulated outside the Committee to avoid debates about

decisions already arrived at.

- Regular monitoring of schemes is important in giving members the opportunity to include new responsibilities and extend or modify the working of the scheme.
- There should be parallel delegation over enforcement action.

(c) Best Value and performance improvement

Making the best possible use of delegated powers has been identified by the Audit Commission as one of a number of ways to reduce delays in making decisions on planning applications without compromising the quality of those decisions. Planning applications can either be determined through consideration at a committee meeting involving local councillors, or arrangements can be made to allow some of the decisions to be taken by staff without any referral to the committee.

Since 1997, planning authorities have provided information about the number of applications decided by planning officers under a scheme of delegation and without referral to committee.

The existence of an Authority's Scheme of Delegation demonstrably set within the good practice framework outlined by the Planning Officers Society (see 2(b)) should be enough to confirm that the authority recognises and pursues the ODPM's performance aspirations. In the pursuit of the ODPM's performance aspirations, delegation schemes must recognise the wide variety and differing complexity of applications and the need for accountability, involvement and open debate. This is especially the case in terms of the larger and more complex cases. Frustration may find expression in reluctance to accept delegation of planning application decisions.

(d) Local Government Act 2000: Area Committees

Under the new arrangements for local governance brought into effect by the Local Government Act 2000, development management decisions will continue to be taken by the planning committee. The committee will retain the facility to delegate decisions to area committees under Section 101 of the Local Government Act 1972.

A small number of strategic planning functions – such as the preparation of supplementary planning guidance, designation of conservation areas and the removal of permitted development rights through Article 4 Directions – will be the responsibility of the Executive. The 2000 Act allows delegation of these functions to area committees, with the provision that rigorous scrutiny and accountability arrangements are in place and delegations continue to be strictly defined. Government guidance accompanying the Act makes clear that, in the interests of propriety, local authorities should restrict their delegations to area committees to minor decisions of a local nature. It emphasises that the Secretary of State has reserve powers to limit the extent to which the executive can delegate to area committees if this proves necessary.

(e) Transparency – Public access to documents on delegated decisions

The Local Government (Access to Information) Act 1985 provides the public with a general right of access to meetings of principal local authorities and meetings of their committees and sub-committees, including the related documents. However, there is no statutory right of access to local authority files containing documents relating to delegated decisions.

LGA would encourage councils to introduce measures to ensure that the public understand the working of the delegation system and the reasoning behind it. Leaflets on delegation, explaining processes and rights of appeal are helpfully produced by some councils. LGA considers in the interests of promoting delegation and Human Rights and as a matter of general good practice, the file on delegated applications should be just as available for public inspection as a file on an application going to committee. Consultation replies and other background material would be open to all.

The view of the Local Government Ombudsman is that reports should be produced detailing the material considerations, views, objections and reasoning behind delegated decisions and that these should be available for councillors and the public. The Freedom of Information Act 2000 encourages the publication of all material except where there is a statutory reason why this should not be the case and requires the council to maintain a publication scheme detailing what information is available and where it is to be found.

The Government has extended the provisions on information to be included in the planning register (so that authorities have to put their reasons for granting permission on the planning register). This applies to both committee and officer decisions.

Building confidence and consensus – a good practice example

Building confidence among all parties involved is a key to successful delegation practice. Both applicants or objectors are much more likely to accept a decision which goes against them if they feel their views have been given full consideration before a decision is given. At committee this process can be seen to operate. Proposers and protagonists can 'have their day in court'. A similar level of transparency and a clear audit trail must be secured for delegated decisions.

One way to build such confidence is through the use of stakeholder Forums or Panels. The Swindon planning Panel, meets four times a year with councillors, developers, designers and others. The Chair is currently the Chair of the planning committee and the Vice Chair a prominent local developer, reflecting the cross cutting nature of the Panel.

The Panel meets away from the formal, quasi judicial format of the committee meeting and the tensions sometimes raised by individual applications. By tackling issues in the generality the Panel seeks to explore ways of achieving the highest common standard for the service. Differences can be discussed openly. Quite often, what all parties want is the same-consistent, quality outcomes delivered with speed and certainty in accordance with agreed policy. The Panel can act as a monitor to encourage progress towards this goal, taking into account a broader perspective than the national Performance Indicators allow.

The Panel (of about 20 members) meets four times a year, with the summer meeting devoted to a day long tour of significant development sites in the town. Members of the Panel include the Chair and two other members of the Planning Committee together with representatives of:-

Major national development companies

Local development companies

Wiltshire Chapter of the RIBA

Local designers/agents

Swindon Civic Trust

Parish Councils

The Panel has not been in existence for long but has already produced solid achievements. In the past year the Panel has discussed standardising S106 agreements and the suggested Charging option, a report commissioned from the Bailey Consultancy on the Council's performance and BVPI's. There have also been several spin-offs with developers leading masterclasses for planning staff about the commercial aspects of the development process and a visit to the planning section by all Parish Clerks.

Appendix 1

(a) The ‘by exception’ model

The simple model adopted by Poole District Council exemplifies the ‘by exception’ model. *All* applications are considered for delegation unless they fall into any one or more of ten defined categories. This model is not prescriptive but included to illustrate a working model from a busy local council. Poole dealt with 1,745 applications under delegated powers in 2002-3. Operation of the scheme is backed up by annual random spot checks of 52 applications which form the agenda for a Delegation Review Meeting. This scrutinises the processing of the applications and asks whether members are satisfied with the way that the scheme has been operating.

(b) Example from Poole Borough Council

All planning applications are considered to fall within the delegation scheme and will be determined by officers unless;

1. A councillor makes a written request for the application to be considered by the planning committee.
2. The planning officer considers that the application should be considered by committee.
3. The application would represent a departure from the policies of the statutory development plan.
4. The proposal involves the Borough or County Council either as applicant or land owner and the scheme is not of a minor nature.
5. The applicant is a councillor.
6. The applicant is a member of the council’s management team, a service unit head, a member of Planning design and control/management

services or any member of staff within the authority who could be seen as having a direct input to, and therefore influence on, application decisions.

7. Any other application from employees of the borough of Poole may be delegated subject to prior consultation with the chairman and vice chairman of the planning committee.
8. Any application where a council employee is involved in any capacity – eg agent or consultant.
9. Any planning application involving a Housing Association which will result in the creation of additional residential units.
10. Application for telecommunications developments which involve the erection or installation of new masts. Proposals for additional antennae or dishes or existing telecommunications structures fall within the scheme of delegation.

Appendix 2

Some examples of areas where local discretion might modify the approach set out in Appendix 1

- For certain categories of application, delegated powers should only be exercised, following written consultation with, and approval from, the relevant Committee Chair.
- Substantive third party objections to a delegated application.
- Where refusal of a delegated application is recommended, a period of (seven) days for the relevant Committee chair and Ward Member(s) to request that it be referred to Committee for decision.
- The consideration of a delegated application by the relevant Committee in cases where a petition about the matter has been received, whether or not it contains a relevant planning objection.
- Where retrospective applications are recommended for approval, these should only be decided by committee.

Delegation schemes occur in local authorities when a chief or designated officer takes executive action on behalf of the council. These are now operated by most councils and are seen as a key method of reducing delay in planning applications and related areas.

Delivering Delegation - co-authored by the ODPM and LGA - provides guidance towards and examples of well-constructed delegation agreements. Other matters considered include when to refer applications, the role of elected members, the impact of the Local Government Act 2000 and issues of transparency.

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