

	<h1>Housing and Growth Committee</h1> <p>14 September 2020</p>
Title	Enabling Investment in Digital Infrastructure
Report of	Chairman of Housing and Growth Committee
Wards	All
Status	Public
Urgent	No
Key	Yes
Enclosures	None.
Officer Contact Details	<p>Stephen McDonald, Director of Growth. 020 8359 2172 – Stephen.McDonald@barnet.gov.uk</p> <p>Luke Ward, Assistant Director – Development and Economy 020 8359 6445 – Luke.Ward@barnet.gov.uk</p> <p>Adam Driscoll, Commissioning Lead - Growth 020 8359 4922 – Adam.Driscoll@barnet.gov.uk</p>
<h2>Summary</h2>	
<p>This report proposes an approach to working with broadband service providers that will accelerate investment in high speed digital infrastructure across the borough and improve the opportunity to roll out 5G services for residents and businesses. The proposed approach involves the development of a wayleave framework agreement that will replace the numerous and individually negotiated, wayleaves that currently need to be agreed on a case-by-case basis before any installation of new fibre infrastructure can take place. It will directly help to address barriers to digital inclusion, enable jobs creation, boost economic resilience, and improve access to online services.</p>	

Officers Recommendations

- 1. That the Committee notes the ongoing work to remove barriers to investment in improved digital connectivity and to support digital inclusion; and confirms support for the principles set out in paragraph 1.11 that will inform the detailed legal arrangements and implementation of improved broadband infrastructure.**

- 2. That the Committee delegates authority to the Director of Growth to finalise the terms of and enter into overarching commercial agreements for the implementation of improved broadband infrastructure.**

- 3. That the Committee delegates authority to the Director of Growth to finalise the terms of and enter into individual wayleave agreements with operators for the implementation of improved broadband infrastructure.**

1. WHY THIS REPORT IS NEEDED

- 1.1 This report sets out and proposes an approach to working with broadband service providers that will make it easier for them to invest in high speed digital infrastructure across the borough, and enable the faster roll out of associated broadband and 5G internet services for residents and businesses.

- 1.2 The proposed approach involves the development of overarching agreements capturing the principles of cost recovery, process and the quality service standards which the Council requires. It will also append a precedent form of wayleave to reduce the amount of negotiation usually required for wayleaves. This proposal forms a key part of the council's approach to digital infrastructure as set out in the Growth Strategy delivery plan agreed by the committee in January 2020.

- 1.3 Presently if a broadband service provider wishes to install a new fibre connection for any tenant or leaseholder of Barnet Council, the council must sign a legal agreement (a wayleave) specifying the controls, licence rights and responsibilities for accessing the land, exact details of the technical installation and associated health and safety (e.g. fire safety) measures it will take. This can be a time consuming and relatively expensive process for a relatively small investment, and as a result the council has only signed a small number of agreements with Virgin Media where access was sought to a specific housing block.

- 1.4 The signing of an overarching agreement with a precedent wayleave appended however flips the process so that the overarching programme, standards, compliance and commercial terms are resolved up front with each suitable service provider. This leaves just the site specific technical, safety and communication matters to be addressed through a 'signing off' process that completes the wayleave for each relevant block. This report confirms the principles for such an approach, which has a successful track record elsewhere, and will enable faster decision-making for digital infrastructure investment.

- 1.5 In addition, the Covid-19 pandemic has resulted in one of the most significant economic challenges facing the UK in over a century, and has highlighted the crucial importance of high quality and ubiquitous digital access that allow businesses to thrive and residents to access the services they need. The proposals in this report respond directly to this by

catalysing and speeding up new investment in vital digital infrastructure that will help residents and businesses access high speed internet wherever they are, support new ways of working, and drive new job creation.

FRAMEWORK WAYLEAVE PROJECT

- 1.6 This proposal seeks to secure economic benefit from widespread and high-quality digital connectivity across the borough through leveraging the granting of a right of access to the Council's estate. This is done through the negotiation and agreement of an overarching agreement with service providers setting out how they will deliver to high standards and signing up to the legal terms that need to be met in order to access the particular estate and public highways to install new fibre broadband services. This approach would replace the individually negotiated wayleaves that were previously used and which are generally too time consuming to agree and deliver (meaning very few have been agreed to date). The project will enable fibre broadband services to be rolled out across the borough, and the council will especially encourage improvements to be delivered within areas that previously received a poor service.
- 1.7 The wider opportunity from this proposal is the underlying network that each provider will roll out covering the streets between each area of the council's estate, thereby providing a backbone for the delivery of new fiberoptic broadband connections for businesses and households in these areas at much lower cost and where it may have previously been viewed as unviable by providers.
- 1.8 Similar programmes are already in place in several other local authorities. The council has particularly learnt from the experiences of Westminster Council and neighbouring West London Alliance (WLA) boroughs whose experience has informed the proposed approach in Barnet. The experience the City of London and Southwark also fed into and informed early discussions.
- 1.9 Barnet has coordinated the legal advice with other WLA boroughs who share HB Public Law as their provider of legal services. This has reduced costs and allowed the councils to share expertise with the intention of standardising documentation.
- 1.10 The Electronic Communications Code, set out in the Digital Economy Act 2017, sets the framework for the council to engage with broadband service providers and this largely controls the way the council has undertaken discussions with the service providers. The council can use the wayleave process to steer and encourage them to also consider our priorities as part of their investment programme, through ongoing engagement and coordination.
- 1.11 The principles proposed for guiding the roll out of digital infrastructure through the intended process are:
 - To maximise the extent and coverage of fibre broadband availability for residents and businesses in the borough.
 - To deliver the rollout of improved digital infrastructure in a way that minimises the disturbance to residents and businesses in the borough.
 - To ensure delivery of fibre broadband networks at pace (2-3 years ideally).
 - To leverage social, environmental and economic value and secure investment in digital investment that everyone in the borough can benefit from.

1.12 To achieve the above priorities the Council will only enter into the relevant legal agreements with providers who are willing to:

- i. **Work in partnership to ensure more comprehensive area-wide rollout.**
The council hopes all properties within reasonable distance of a proposed provider network will benefit from connection and for an affordable connection fee at most. The council recognises that the installation of fibre broadband is a commercial decision for providers but will seek to prioritise access to blocks where a provider designs a more comprehensive rollout programme to ensure as many residents will be provided with improved connections as possible.
- ii. **Set out a minimum 2-3-year plan for investment and commit to deliver it.**
By defining and organising the approach to delivery over the medium term, it will allow the council to more effectively coordinate the rollout programmes of providers and Barnet Homes works. The ability to coordinate and influence delivery plans (with appropriate confidentiality to protect commercial interest) will minimise disruption, maximise the pace and extent of fibre rollout, whilst helping to secure the maximum potential from related investments (e.g. 5G).
- iii. **Commit to a minimum additional ‘social value’ benefit per dwelling,** either through directly delivered social value outcomes, or the provision of a financial contribution towards a council fund for supporting digital inclusion projects. For more details please see section 5.8 of this report on social value.
- iv. **Be a considerate partner and meet expected standards,** to commit to the required standards and expectations around their approach to planning, engagement with residents, installation, ongoing management and end of life/use removal or replacement of equipment associated with the fibre broadband rollout. Together with associated commitments such as managing associated highways works to minimise disruption and damage where other rights of access are applied.

2. REASONS FOR RECOMMENDATIONS

Stimulation of investment, economic growth and improved digital infrastructure

- 2.1 Guidance from government is for local authorities to support and work with providers to maximise the pace and coverage of rollout, focusing on the wider economic benefits to the UK from fibre broadband rather than seeking to cash in on ‘access rights’. The proposals here are cost neutral.
- 2.2 With the right encouragement and assistance, and by removing barriers to investment, it is realistic to expect that Barnet will be well placed to receive area-wide rollout of fibre broadband and related digital infrastructure technologies in the early years of provider investment programmes. Unlike other areas of the UK, Barnet is likely to benefit from the stronger competition between providers to be the first and win customers to secure the widest coverage and uptake in London. This competition means that providers will be more willing to help the council meet its own priorities, if they can be assisted to have faster and easier access to a large potential market of households and businesses.

- 2.3 The SME business sector in Barnet will particularly benefit from the proposal, as the creation of fibre broadband backbone networks will most likely run along main roads, through town centres, and in close proximity to Barnet's small industrial estates, unlocking the potential for faster business broadband connections. But most significantly it will support residents, and especially residents who run businesses from their homes or those who work or study from home, to receive faster and more reliable broadband. The delivery of fibre in a competitive market will open up opportunities for a more affordable range of connection options to higher specification broadband services.
- 2.4 Wider digital and technological innovation is fundamentally dependent on the availability of a high capacity 'backhaul' service, and therefore by supporting the rollout of the fibre networks across the borough in 2021/22 and 2022/23 in particular, it lays the foundations for a more stable and higher capacity 5G network to be rolled out based on local small cell capabilities, rather than being solely dependent on the capacity of large masts. This shift is argued to be critical to supporting the growing 'internet of things' and commercially will be more beneficial for the Council.

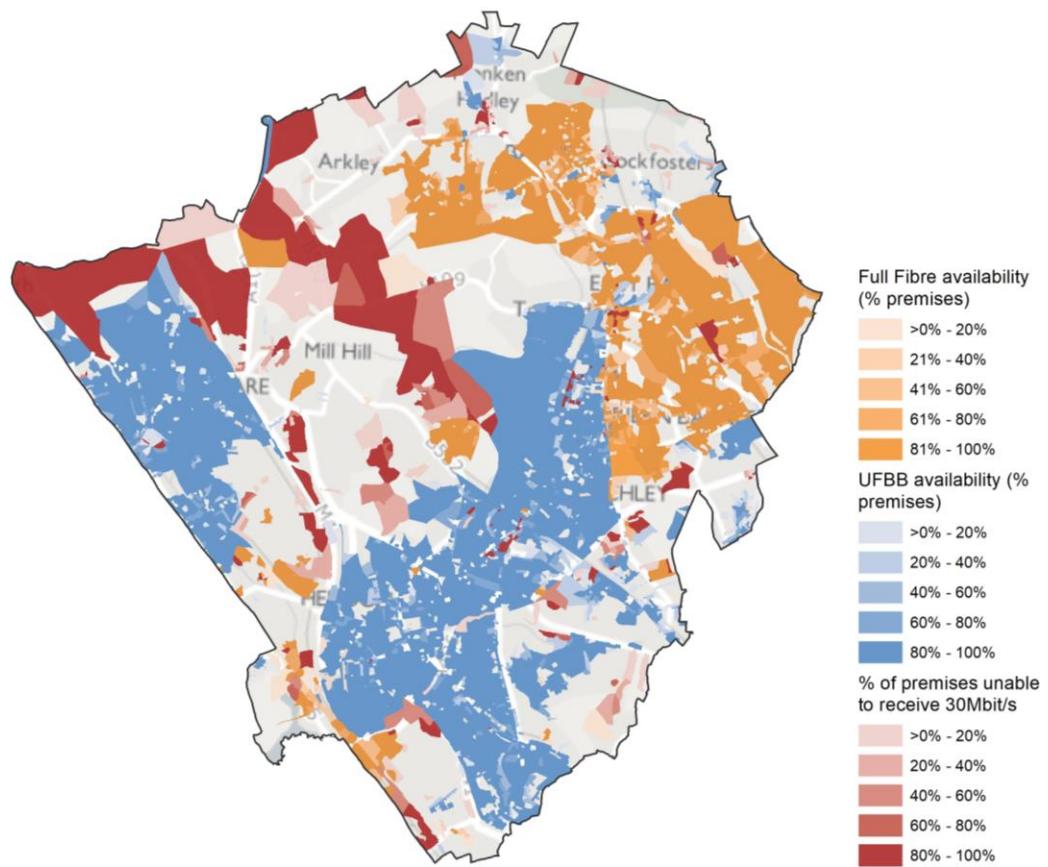
Digital Inclusion

- 2.5 UK digital recognises 4 general barriers to digital inclusion: Access (physical and financial), Skills, Confidence, and Motivation. This proposal primarily addresses barriers to access, but also could help improve skills and confidence online. A 2017 survey indicated that Barnet has a low likelihood of digital exclusion with only 11% of Barnet households having not been online¹, while 79% of adults are recognised to have the 5 basic digital skills (managing information, communicating, transacting, problem solving, creating). The project should therefore use the social value opportunities to support skills development and confidence building through a more targeted approach. In terms of motivation, the restrictions for society as a result of COVID-19 have been challenging but have likely resulted in more people now getting online and an opportunity to engage with residents and businesses to help them improve skills and confidence.
- 2.6 In terms of physical access, the current level of broadband connectivity within the Borough is shown in figure 1. It highlights that although some parts of the borough have access to faster broadband, it is by no means comprehensive. Connectivity in most areas is limited to the existing Openreach infrastructure (telephone lines), with the higher capacity Virgin Media infrastructure generally not available to Barnet Homes tenants and leaseholders, except in a few places where a wayleave was previously agreed. In addition, the map highlights some specific locations that do not even have access to superfast broadband (up to 30Mbps); in most areas on the map this relates to green spaces, but there are 0.7% of premises (about 1,000 properties) who receive inadequate access to broadband services (<5Mbps maximum) that needs to be addressed.
- 2.7 In terms of financial access, although providers tend to be more interested in postcodes where customers are likely to pay for a higher spec. service, the demand and commercial potential for fibre broadband appears to more closely align with areas of higher density housing and areas with generally a greater younger / working age profile. Therefore, fibre broadband is more likely to be made available within the relevant areas, meaning

¹ UK Tech Partnership, 2017. "UK Digital Exclusion Heatmap". <http://heatmap.thetechpartnership.com/?area=Barnet&metric=total>

that the focus of measures to address financial barriers should focus on the household level. A critical shift in recent years is that with many new service providers wanting to compete for customers, most have developed a range of more affordable broadband products, mostly through various ways of sharing Wi-Fi or fibre lines.

Figure 1 – London Connectivity Map for Barnet



3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- 3.1 **Do nothing:** The Housing and Growth Committee could choose to maintain the current reactive process of ageing individual wayleave agreements on a case by case basis. This would result in slower rollout of fibre optic across the Council's Estates and higher levels of digital exclusion. The outbreak of COVID-19 has highlighted the importance of digital connectivity and inclusion for residents and businesses, especially as a means of accessing vital services.
- 3.2 **Utilise public sector owned ducting to engage in a public-private joint delivery of fibre broadband supply:** Barnet Council currently does not own any significant fibre ducting within the Borough, nor has the expertise or mandate to actively roll out fibre broadband services itself within what is a competitive private sector marketplace.
- 3.3 **Single Provider:** The nature of the legislation means that it would be much more complicated and costly to procure a single provider to deliver fibre broadband to Barnet

Homes, tenants and leaseholders due to public procurement and state aid implications, and 'Code Rights' under the Electronic Communications Code, which broadband service providers enjoy, and in the longer term it could end up being more costly for residents if there is not adequate competition.

4. POST DECISION IMPLEMENTATION

- 4.1 Should the committee approve the proposal, then the council will publish its criteria and expectations and make available the template agreements to providers under the overarching agreements. The council expects to enter into agreements with broadband service providers in October / November. It is expected the implementation will begin in early 2021.
- 4.2 Once an agreement has been entered into with a service provider, the Council and provider will review the proposed rollout schedule to co-ordinate the timing of plans and proposed activities across the Borough and between providers to minimise disruption to residents and businesses and maximise the coverage. The process will be closely monitored so that any challenges encountered can be effectively resolved.
- 4.1 As part of the planning phase of the process, surveys and other preparatory activities will also be undertaken by the service provider to inform the approval of planning packages by the Council prior to the commencement of site work, which will include communication to residents and businesses, and inspection processes to ensure completed works meet the quality standards as set out within the wayleave agreement. Highways and Estates Teams will also be closely involved with the planning process.

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

- 5.1.1 The Corporate Plan outlines the Council's approach to provide a fair deal for our residents, and a commitment to delivering services that matter most by making decisions that prioritise our limited resources. The aims of the Digital Infrastructure Programme support the three outcomes presented through the Corporate Plan, particularly investing in the borough, and shaping safer and stronger communities.
- 5.1.2 The Digital Inclusion Strategy, approved by Policy and Resources Committee in 2016, is supported by the priorities of this project. The strategy sets the framework for the Council's approach to digital inclusion across five key objectives:
 - Improving Digital Literacy and Skills;
 - Expanding digital accessibility to meet the needs of residents and businesses;
 - Ensuring digital inclusion is affordable for residents and the Council;
 - Informing stakeholders of the benefits of digital technology; and
 - Reassuring residents that using digital infrastructure is safe and reliable.
- 5.1.3 The Council's Growth Strategy and associated delivery plan, adopted in January 2020, stated the council would 'implement state-of-the-art digital infrastructure by working with public and private sector partners to incorporate this into regeneration schemes, council assets, and in local places employers need, such as in our town centres'.

5.1.4 In addition to the broader connectivity and digital inclusion outcomes, this project has the potential to support the wider Growth Strategy aspiration to make Barnet the best place to be a small business in London. As Barnet is currently home to approximately 23,000 businesses, the majority of which are micro businesses with fewer than nine people, as fibre broadband is installed and connected up between council estates, it is expected that the backhaul network will help increase in the number or at least the viable potential of businesses in the locality, supporting increased employment and productivity.

5.2 Resources (Finance & Value for Money, Procurement, Staffing, IT, Property, Sustainability)

- 5.2.1 The programme is cost neutral whilst increasing connectivity and supporting digital inclusion for both residents and businesses.
- 5.2.2 If the proposal is approved by this committee, the council will ensure appropriate resources are secured to manage the signing and monitoring of agreements. A wholly case by case wayleave process is less efficient and less certain for service providers. It also does not enable council officers to encourage higher standards of practice in the implementation and ongoing management. By contrast, the proposal here would unlock the ability to set clear processes and requirements up front, meaning that staff capacity can focus on technical compliance and be available to address a scaled-up programme, however some additional resources will be required and these are expected to be recovered through fees and charges.
- 5.2.3 Appropriate fees and charges will be developed as part of the commercial basis of the wayleave arrangements. This will be on a 'cost recovery' basis to ensure that the engagement of the council is fully funded through external income and not dependent on scarce general funds. It is expected that there will be both an up-front fee at the time of the signing of the overarching agreement, with a standardised set of fees and charges applying at the wayleave 'planning package' signing-off stage to cover the technical work required to agree the route and the associated project costs for oversight and monitoring.

- 5.2.4 Council Officers have also consulted with HB Public Law who have confirmed that these proposals do not trigger a requirement to comply with the Public Contracts Regulations 2015 and run a regulated competitive public procurement exercise. The Electronic Communications Code (ECC) set out in the Digital Economy Act 2017 gives statutory rights to (qualifying) telecommunications operators to construct infrastructure and install and maintain equipment on, under and over land to provide communications network. The aim of the ECC is to facilitate the rollout of digital communications infrastructure in support of the Government's national broadband strategy. The rights conferred under the ECC can be granted to a qualifying operator in one of two ways; (1) By written agreement with the relevant landowner/occupier or (2) By an agreement imposed by court order. The Council's clear preference is to enter into voluntary agreements with the qualifying operators.

5.3 Social Value

- 5.3.1 The Public Services (Social Value) Act 2012 requires people who commission public services to think about how they can secure wider social, economic, and environmental benefits from public procurement activities. The agreement of a Wayleave is not a public

procurement process, but the negotiated commercial nature of the wayleave process means that there is still an opportunity to encourage providers to consider the social benefits they could deliver. This complies with council policy to seek to extract social value from all council commissioning, not just in relation to services contracts regulated by public procurement regulations to which the Social Value Act applies. One benefit of the suggested approach is that provided expectations of the council are reasonable and proportionate, it will be possible to encourage all providers, being granted the opportunity to improve the viability of rolling out fibre broadband, to meet a minimum level of additional social value.

5.3.2 A provision will be inserted into the overarching agreement to require service providers to demonstrate how they will meet the minimum level of additional social value to the borough through the rollout process of granting site specific wayleave agreements. Through initial engagement it is clear that most, but not all, providers deliver a level of additional social benefit through at least one if not more than one of the following three methods:

- ***Free connections for community facilities*** (the measure is usually delivered as one free fibre broadband connection per # residential properties connected).
- ***Digital training and upskilling opportunities*** (often delivered in partnership with a third sector voluntary organisation or through online courses and webinars to expand the skillset of residents and businesses).
- ***Local employment and apprenticeships*** (often delivered by recognising a certain % of residents newly employed and a # of apprenticeship places).

5.3.3 The council will seek to ensure that providers who go the extra mile will be recognised for this and enabled to continue delivering their rollout programme provided it delivers a minimum amount of additional social value per property they will be connecting.

5.4 Legal and Constitutional References

5.4.1 Article 7 of the Council's Constitution states that the Housing and Growth Committee's functions include Housing Strategy, homelessness, social housing and housing grants, commissioning of environmental health functions for private sector housing and asset management. The Housing and Growth's functions also includes receiving reports on relevant performance information and risk on the services under the remit of the Committee, as well as regeneration strategy and major regeneration schemes, asset management, employment strategy, business support and engagement.

5.4.2 The Council must ensure compliance with the Electronic Communication Code (ECC). The ECC states that the Council must undertake a standard and fair approach when working with Broadband Service Providers.

5.4.3 An overarching agreement to be granted over the housing stock would provide the structure of the legal agreement and headline rights and terms relating to the future laying of cables/infrastructure across the council's estate, but would not define the routes. A 'wayleave', as matter of law, is an easement and therefore cannot take legal effect without a defined route; therefore, it will only be through the agreement of individual routes and associated technical details, that access rights will come into legal effect.

5.4.4 Unlike arrangements which involve the provision of services, such as agreements for

local area Wi-Fi provision, these agreements only involve the conferring of a right, and not the procurement of services. It would therefore appear to be unnecessary for the council to run a procurement exercise before entering into a wayleave, or other form of property right with a Code operator under the ECC. Under The Public Contracts Regulations 2015 (PCR) public service contracts for the acquisition or rental, by whatever financial means, of land, existing buildings or other immovable property, or which concern interests in or rights over any of them, are exempt from the requirement to run a competitive tender process under the PCR.

- 5.4.5 Similarly, unless there is an intention to offer exclusivity over an entire estate of assets, it would also appear not to be necessary to offer access through a concession agreement, run under tender in compliance with the Concession Contracts Regulations 2016.
- 5.4.6 As with any other term of an agreement to host digital communications infrastructure, financial terms should be agreed, wherever possible, on a consensual basis between the parties. However – as with other terms - it is important to note that these agreements are underpinned by a statutory framework, (the Electronic Communications Code as set out in the Communications Act 2003, amended by the Digital Economy Act 2017).
- 5.4.7 The council has various statutory powers to enter into the overarching agreement and the wayleave agreements with the qualifying operators, including but not limited to under the Digital Economy Act 2017 and the ECC, the general power of competence in section 1 of the Localism Act 2011, and section 111 of the Local Government Act 1972 giving local authorities the power to do anything “which is calculated to facilitate, or is conducive or incidental to, the discharge of any of their functions”.

5.5 Risk Management

- 5.5.1 An initial risk is that service providers decide not to sign up to an overarching agreement should it appear too onerous. This has been mitigated through early engagement and coordination, and as a result three providers have indicated very strong interest, with some others confirming interest too but are not quite as ready to sign-up. Soft market testing of the draft requirements with the most engaged providers will take place prior to them being finalised.
- 5.5.2 The key programme risk will be that a service provider moves quickly but limits their delivery plans to the most profitable locations and rolls this out across the borough quickly during 2021. This would likely be to the blocks/estates with over 25 dwellings and especially those with over 50 dwellings, see figure 2. A highly selective approach such as this would be commercially short-term minded, but would slow down the ability to secure multiple broadband backhaul networks, as well as resulting in fewer smaller housing blocks or individual properties being fibre connected ahead of completion as part of the national ‘universal service obligation’ programme to upgrade telephone lines.

Figure 2 – Grouping of council housing by number of dwellings per estate

Number of dwellings listed within each estate	Count
Greater than or equal to 100	16
Between 100 and 50	17
Between 50 and 25	41
Less than 25	283

5.5.3 The final key risk that will be managed is how the council will address the implications of one provider or even Barnet Homes works programmes changing or being delayed, and how this might have knock-on implications for the programmes of other service providers. This will therefore be mitigated through a combination of clear change controls, once a rollout programme is agreed, together with clear council project leadership through scheduled coordination meetings with service providers to discuss issues and manage the implications of delays and changes to the rollout schedule.

5.6 Equalities and Diversity

5.6.1 The 2010 Equality Act outlines the provision of the public sector equalities duty that requires public bodies to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act (2010).
- Advance equality of opportunity between people from different groups, and
- Foster good relations between people from different groups

5.6.2 The Digital Infrastructure programme is designed to have a positive impact upon Barnet's residents and businesses, and especially in relation to meeting the council's equalities and diversity duty to advance the equality of opportunity. This will be both in spatial terms and due to the nature of the diversity of people living within the council's estate.

5.6.3 In spatial terms the indicative rollout programmes most of the providers have shared in advance appears to prioritise the delivery of fibre broadband across the west of the borough and to council wards where there is a recognised greater diversity of residents; this inherently ties in with the locations across the borough where there is also a greater incidence of council housing within closer proximity. It is particularly notable that most locations where there is a measurable greater level of deprivation are identified as areas where several service providers are seeking to begin the rollout of fibre broadband.

5.7 Corporate Parenting

5.7.1 The changes will have no direct impact on looked after children or care leavers, except where they happen to live within the council estate. Given the digital inclusion benefits noted in this report, it is likely that where digital infrastructure to council housing can be improved, and particularly where low cost or free services can be secured, then this will have a positive impact on those children and care leavers. In addition, the potential for social value benefits to secure opportunities for local jobs and apprenticeships opens up the potential for training and skills development in related engineering and sales fields.

5.8 Consultation and Engagement

- 5.8.1 The objective of ‘implementing state-of-the-art digital infrastructure’ within the Growth Strategy received strong support from respondents to the Draft Growth Strategy public consultation from 3 July 2019 until 15 September 2019. This informed the development of a programme for digital infrastructure and the proposals set out in this report.
- 5.8.2 In signing-up to the standards expected of those entering into an overarching agreement with the council, a service provider will commit to delivering in accordance with clear procedures for contact and engagement with residents and businesses. This will manage planning, installation, safety and other expectations, including how disturbance will be minimised.

5.9 Insight

- 5.9.1 The Digital Infrastructure Programme has been informed by an evidence base relating to the Council’s existing digital infrastructure and assets, research into digital inclusion and connectivity across the borough, an understanding of how broadband services providers operate, and knowledge of broadband use and demands during the lockdown period. Working in collaboration with other WLA boroughs has resulted in greater understanding, access to information, and the sharing of technical expertise and knowledge.

6. BACKGROUND PAPERS

- 3.1 Policy and Resources Committee – 11 December 2018 – Item Eight: Corporate Plan 2019 – 24, Business Planning, Medium Term Financial Strategy 2019/24 and Draft Budget for 2019/20 -
<https://barnet.moderngov.co.uk/documents/s50139/Corporate%20Plan%202019-24%20Business%20Planning%20Medium%20Term%20Financial%20Strategy%20201924%20and%20Draft%20Budget%20.pdf>
- 6.1 Policy and Resources Committee – 5 October 2016 – Item 10: Customer Transformation Programme
<https://barnet.moderngov.co.uk/documents/s34906/Appendix%20B%20Digital%20Inclusion%20Strategy.pdf>
- 6.2 Housing and Growth Committee – 27 January 2020 – Item 16: Growth Strategy -
<https://barnet.moderngov.co.uk/documents/s57407/Growth%20Strategy.pdf>