

13 September 2023		ITEM: 14 Decision: 110668
Cabinet		
Delivery of Thames Freeport as the Accountable Body		
Wards and communities affected: All	Key Decision: Key	
Report of: Cllr Deborah Arnold, Deputy Leader and Cabinet Member for Transformational Change, Communications and Governance		
Accountable Assistant Director: N/A		
Accountable Director: Asmat Hussain Interim Director of Law and Governance		
<p>This report is Public with exempt appendices</p> <p>Appendices 2,4,5,6,7,8,9 contain exempt information which falls within schedule 12A of the Local Government Act 1972 - <i>Information relating to the financial or business affairs of any particular person (including the authority holding that information)</i>. In all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.</p>		
Date of notice given of exempt or confidential report: 5 September 2023		

Executive Summary

Thames Freeport is a core feature of Britain's Trading Future and will drive economic growth across the Thames Estuary. It is forecast to deliver 21,000 + jobs, £4.6bn of public and private investment and to support regeneration and levelling up activity in line with Freeport policy objectives using retained business rates over the next 25 years. Thames Freeport has the potential to be a game changer for Thurrock provided the partners can drive delivery and maximise benefits for local residents and businesses.

The Freeport is led by the private sector (by Forth Ports, Dubai Ports World and Ford UK) and Thurrock Council. Thurrock Council has a key, dual, role to play, to act as the Accountable Body and to be an active partner on the Thames Freeport Governing Board driving delivery of the Freeport and maximising the economic and social benefits for the people and businesses of Thurrock and the wider freeport area. In addition, Thurrock Council is a billing authority for retained business rates.

This report sets out proposals for delivering the Council's role as the Accountable Body for Thames Freeport. The workstream relating to the Council's role as Accountable Body will be managed through the Improvement Recovery Plan process, reporting to the Senior Leadership Team and Cabinet. The appropriate governance and management systems in place will enable the Council to play its role in Freeport delivery effectively, efficiently, and in compliance with the Directions under the Local Government Act 1999 which directs the Council to take steps to ensure that the role of the Accountable Body to the Thames Freeport is exercised to the satisfaction of the Commissioners.

Commissioner Commentary

Given the very specific direction to Thurrock relating to Commissioners' oversight of the freeport it is important that Commissioners are fully engaged in the creation of the freeport and its governance arrangements, including the detailed risk management arrangements. The freeport has the ability to bring great benefits to Thurrock but must do so in a way that risks to the Council are minimised.

In order to be satisfied as to how Thurrock Council is correctly operating the Freeport it will need to ensure:

- (i) the Council has identified its accountabilities and responsibilities under the legislation and the MoU with DLUHC
- (ii) appropriate legally binding agreements are in place to set out responsibilities and accountabilities with
 - a. the Freeport Board
 - b. the Freeport operating company
 - c. the landowners
 - d. the other billing authorities
- (iii) the freeport board has been constituted formally with a constitution approved by the Council with clear powers and appropriate governance dealing with conflicts, interests and fair decision-making arrangements.

1. Recommendation(s)

Cabinet is asked to:

- 1.1 Approve the proposed arrangements of the Council to oversee the delivery of Thames Freeport**
- 1.2 Note the resource implications associated with delivery of Thames Freeport; £1m DHLUC capacity funding, £2.257m retained business rates and £25m Seed Capital funding**
- 1.3 Note the progress made to merge the Thames Freeport Final Business Case and Addendum (previous approved by Cabinet) into a single document, a consolidated Thames Freeport Business Case for submission to Government to prepare the Memorandum of Understanding between Government and Thames Freeport Partners.**

- 1.4 Delegate authority to the Chief Financial Officer (Section 151 Officer) in agreement with Commissioners and in consultation with the interim Director of Law and Governance (Monitoring Officer) the Chief Executive and the Leader to:**
- (i) finalise the consolidated Thames Freeport Business case;**
 - (ii) sign the finalised consolidated Thames Freeport Business Case on behalf of the Council;**
 - (iii) submit the consolidated Thames Freeport Business Case to Government on behalf of the Council.**
- 1.5 Approve the establishment of the Thames Freeport Committee as a Cabinet subcommittee, as set out in paragraph 3.7 .**
- 1.6 Note the progress made in developing Business Cases for Thames Freeport Seed Capital Projects and that a further report will be brought back to Cabinet in relation to Thames Freeport Seed Capital Projects.**
- 1.7 Note that legally binding agreements will need to be established between the Council, Thames Freeport Governing Body, Thames Freeport Operating Company and recipients of grant funding. These agreements are to support the Council to effectively discharge its obligations as the Accountable Body and Billing Authority, and also to effectively manage and monitor how money is spent in relation to Thames Freeport Projects and the operation of Thames Freeport. These issues will be brought back to Cabinet in a further report.**

2. Introduction and Background

- 2.1** Thames Freeport is a government initiative led by the private sector that will drive economic growth across the Thames Estuary. The three private sector partners - DP World, Forth Ports and Ford - are supported by Thurrock Council, London Borough of Barking and Dagenham, London Borough of Havering. The three landowners and the three local authorities together form the Freeport Partners. The Thames Freeport Governing Board also includes representation from the Thames Estuary Growth Board, the Port of London Authority, an independent Chair and three external strategic advisors. The combined administrative boundary of the three local authorities makes up the outer boundary of Thames Freeport however most economic, environmental and social activity (approximately 90%) will be within Thurrock.
- 2.2** The Freeport is a defined area with tax, customs and other associated benefits designed to attract inward investment and deliver three Government objectives:
- To establish Freeports as national hubs for global trade and investment
 - To create hotbeds for innovation
 - To promote regeneration

- 2.3 An Outline Business Case for the freeport was submitted to DLUHC in July 2021 and, following an extensive review, Government approved the tax sites and gave the initial go-ahead for the Freeport to operate in December 2021. The Full Business Case (FBC) was submitted in January 2022 and updated in April 2022. An addendum to the FBC (Addendum) which addresses a number of critical actions identified by DLUHC in the FBC was submitted to the Government in November 2022.
- 2.4 At a meeting of Cabinet on 7 December 2022, Cabinet approved the Thames Freeport governance structure, the appointment of the Leader of the Council or nominated representative to the Thames Freeport Governance Board. Authority was delegated to the Acting Chief Executive to appoint Council Officers to Freeport sub-committees, and in consultation with the Leader of the Council to enter any Memoranda of Understanding (MOU) with government and Freeport bodies to deliver the activities of Thames Freeport. Cabinet also noted the approach to investing business rates into regeneration and infrastructure projects as the rates become available to Council.
- 2.5 On 20 March 2023 Government announced Thames Freeport had been given final go ahead to formally constitute its board and start operating fully.
- 2.6 During the bid process and until formal announcement, a Freeport Board working group has been in place that included the three private sector partners and Thurrock Council. Within the Council a working group led by the former CEO and including representation from relevant Council departments including Economic Development, Finance and Legal Services oversaw the Council's involvement.
- 2.7 Now the Freeport has been approved by DLUHC, the Council has a number of functions: -
- to act as Accountable Body for the Freeport. Details of the role of the Council in its capacity as the Accountable body is set out in paragraph 3.4 of this report.
 - to be an active partner on the Freeport Board driving delivery and maximising benefits for local residents and businesses
 - to be the rating authority to the Freeport for those elements of the Freeport that fall into Thurrock Council's geography.

3. Issues, Options and Analysis of Options

Freeport Governance Arrangements

- 3.1 The diagrams at **Appendix 1** sets out the proposed arrangements of the Council to oversee the delivery of Thames Freeport, and the Freeport Governance Structure. The consolidated Business Case for the Freeport sets out proposed Governance arrangements in the Management Case Section 5, This document is required to be submitted to Government for Government to

prepare a Memorandum of Understanding between Government and Freeport Partners and the Council. The Memorandum of Understanding sets out the principles under which the Freeport will operate and the roles and responsibilities of Thames Freeport Partners.

- The Thames Freeport Governing Board (TFGB) has overall accountability to Government for the achievement of the freeport objectives and will provide leadership for the Freeport. The Council Leader (or nominated representative) will join the Board as a partner in the Freeport. The Council as the Accountable Body to Thames Freeport will be responsible inter alia for ensuring the good functioning of the Governing Body and will be required to be a member of the Governing Body.
- Thames Freeport Limited is the Operating Company (OpCo) for the Freeport which will be a limited company whose members will be the Freeport Private Sector Partners. No Council officers or Councillors will be members or Directors of the OpCo. The OpCo has been established to deliver the strategies, policies, and projects of the TFGB and will take direction and instruction from the TFGB. However, the only lever the TFGB will have over the OpCo, is that it will have the ability to approve its Annual Business Plan and Annual Financial Plan. The TFGB will receive reports against the delivery of the Business Plan along with its Financial management at TFGB meetings. The OpCo will also be responsible for providing Monitoring and Evaluation reports and Risk Assessment reports to the TFGB. In addition, a legally unenforceable Memorandum of Understanding between the TFGB and the OpCo partners, will set out their commitments to the freeport's objectives. The OpCo as a corporate structure will have a Board which will have full control over the OpCo. OpCo activities will be determined annually when its business plan is prepared by the OpCo and submitted to the TFGB for approval. The objectives of the OpCo are to be aligned with those of the TFGB with an emphasis on supporting the furtherance and implementation of the Freeport strategy and its core projects. As such it will be able to employ staff and contractors, procure goods and services and enter into contracts on behalf of the Freeport. Currently, the Council has no legal relationship with the OpCo. There will need to be formal arrangements between the Council and the OpCo to enable the Council to undertake its Accountable Body functions effectively and also with regard to the use of public money. It is envisaged that these will take the form of a collaboration agreement and separate funding agreements in respect of public money for projects undertaken by the Freeport.
- The Council as the Accountable Body will need to work with and alongside officers of the OpCo to ensure that public funded projects are delivered efficiently and effectively. Further details on the OpCo including draft Articles of Association are included in the consolidated FBC. The draft

shareholders' agreement in the consolidated FBC see pages 312- 339 includes some freeport specific detail, e.g. references to the annual business plan. However, there are also some provisions which could potentially raise issues to work on, including those relating to the shareholders' ability to transfer ownership of the company without input from other Freeport Partners.

3.2 The Secretary of State in Directions to the Council has directed the Council to take steps to ensure that the role of Accountable Body to the Thames Freeport is exercised to the satisfaction of the Commissioners and that delivery of the Accountable body function should be reflected in the Improvement and Recovery Plan. This report sets out a proposed structure that will be implemented subject to the approval of the Commissioners and to the satisfaction of the Government, the Council's Monitoring Officer and Chief Financial Officer.

3.3 This approach will enable the Council to:

- Ensure that any public money the Freeport receives is used to maximise the public benefit for Thurrock;
- By approval of the business plan ensure that the Freeport continues to deliver in line with Freeport policy objectives;
- Maximise the economic benefits and ensure they are targeted towards Thurrock residents and businesses and the catalytic impact of the Freeport is used to best effect to promote Thurrock internationally and attract further inward investment;
- Demonstrate that good governance arrangements are in place.

Accountable Body Function

3.4 The Council's role as the Accountable Body will include, but not be limited to the following functions:

- Establish and maintain a financial system to account for all funding received and disbursed on behalf of the Freeport;
- Review and approval of business cases for seed capital projects by the Council's Cabinet. It was always envisaged and is set out in the consolidated Business Case that any financial risk if the cost of the projects overrun is the responsibility of the project promoter. The outline business cases for the proposed seed capital projects are set out in **Exempt Appendices 5-9**. These Business Cases are in draft form with further work required before approval. The Council, along with LBBD and LBH are the project promoters for the Active Travel project. Onside and the Council are the project promoters for Thurrock Youth Zone. Further information is required on the seed capital projects to meet the outline business case requirements that the Council will need before it can be recommended to Cabinet to approve the projects. Steps have been taken to obtain the required information, and a further report will be brought

back to Cabinet with full details relating to the proposed seed capital projects.

- Receive funding on behalf of the Freeport for example capacity funding and / or seed capital funding from Government and be responsible for its proper administration;
- Ensure, that funding received by the Council in its capacity of Accountable Body is used appropriately in accordance with the law, good financial management any applicable grant conditions and Freeport objectives;
- Through the MOU and annual sign off of the business and financial plans to Government providing assurance that decisions and activities of the Freeport will be taken transparently, will be evidence based and do represent value for money, and compliance with the Nolan principles, the National Assurance Framework; legal requirements; the principles of probity or sound financial practice; applicable funding terms and agreement on scrutiny arrangements. As Accountable Body for Thames Freeport Council will also be required to sign an annual assurance statement for submission to Government;
- Ensure that the checks and reporting requirements of Thurrock Council's Section 151 Officer are met; this includes retaining appropriate documentation on decisions around funding;
- Ensure appropriate control and reporting mechanisms are in place and that all required information on expenditure, activities, outputs and outcomes are properly recorded and reported to the Freeport;
- Retaining necessary information and ensuring all required information on expenditure, activities and outcomes are properly recorded and reported;
- Escalating in the first instance concerns around non-delivery and/or mismanagement to TFGB;
- A support function: providing technical advice on the relevant law, identifying risks associated with pursuing a particular course of action for the TFGB to consider; and
- Responsibility for assessing the overall delivery risk and associated financial risk (up to an agreed level) on behalf of the Freeport.

3.5 The Memorandum of Understanding to be entered into with Government and Freeport Partners sets out non legally binding obligations imposed on the Council acting as the Accountable Body for the Freeport. A summary of those obligations is set out in **Appendix 3** and will form part of the work undertaken by the Accountable Body Officer Group within the Council. This Group is chaired by the Director of Law and Governance supported by the S151 Officer. The membership of this Group includes senior officers representing each directorate and/or service significantly linked to supporting the Council discharge its obligations as the Accountable body. A subgroup has been set up with a Finance lead to oversee matters relating to Thames Freeport Seed Capital Projects, and to provide regular reports to the Accountable Body Officer Group. A report will come back to Cabinet relating to Thames Freeport Seed Capital projects.

3.6 The focus of the officer group is:

- to provide oversight, advice, support and challenge to help the Council develop and implement processes to effectively discharge responsibilities in its capacity as the Accountable Body for the Thames Freeport.
 - Consider how the Council can best deliver its role as the Accountable Body.
 - Ensure that the Council has the necessary resources it needs to operate effectively in accordance with obligations set out in DLUHC's Memorandum of Understanding.
 - Arrangements and processes are proportionate for the assessment and approval of business cases, and formal approval of projects and establishing a funding agreement with recipients of public funds.
 - To test the effectiveness of the Council's governance arrangements and the strategic risk facing the council, primary responsibility for this resting with the Cabinet.
 - Review processes set up by the S151 officer for The Accountable Body to establish a monitoring process to identify possible weaknesses or risks in the operation of projects and provide for corrective action to be taken.
- 3.7 In addition to the above, it is recommended to establish a Thames Freeport Committee as a Cabinet subcommittee to oversee Thames Freeport. The committee to consist of a minimum of three Members, with attendance by key senior members of the Accountable Body Group, the Council's Chief Financial Officer and Director of Law and Governance. The Terms of Reference of the committee and any independent technical support that may be required to support it to be agreed at the committee's first meeting. The Council's Constitution to be updated as required.

Thames Freeport Consolidated Full Business Case

- 3.8 DLUHC has requested that the Full Business Case for the Freeport and the updated Addendum to the Full Business Case which were previously approved by Cabinet be brought together into a single document. The document will then be used by DLUHC to populate the Memorandum of Understanding between Government and all Thames Freeport Partners.
- 3.9 Exempt Appendix 2 sets out the progress that has been made to date to finalise the consolidated the Thames Freeport Final Business Case. Further work is required to finalise this document prior to submission to DLUHC. It is recommended that Cabinet delegate authority to the Chief Financial Officer (Section 151 Officer) in agreement with Commissioners and in consultation with the interim Director of Law and Governance (Monitoring Officer), the Chief Executive and the Leader to finalise the Thames Freeport Consolidated Business Case, to sign it and then to submit to DLUHC on behalf of the Council.

Retained Business Rates

- 3.10 In addition, it is estimated the Freeport will generate approximately £966m in retained business rates over 25 years for Thurrock Council (£956m) and London Borough of Barking and Dagenham (£10m) (billing authority for the entire Ford site)/ London Borough of Havering to invest in regeneration and levelling up initiatives across the Freeport outer boundary and in line with Freeport policy objectives. The Council as Accountable Body will have obligations together with the rating authorities on the use and management of retained business rates in line with the Full Business Case, investment plan and principles contained within Managing Public Money. Final decisions on the use of retained business rates will be for the relevant billing authority to take in line with the final business case.
- 3.11 The rates must be used to support the operation of the Freeport and delivery of Freeport policy objectives. The amount of Business Rates retained will be assessed and reported annually to the TFGB and to the Accountable Body. The TFGB will assess proposals for use of the retained business rates and make recommendations to the billing authorities. The decisions are not binding on the billing authorities however they may uphold recommendations where a proposed projects has clear internal governance requirements and aligns with the Freeport Annual Business Plan, supporting its investment plan or the FBC and taking into account all other relevant considerations.

Resources

- 3.12 The Freeport will access funding to pay for its day-to-day operations by submitting an annual costed business plan which is assessed by the TFGB and the Council in its role as Accountable Body. Once a business plan has been agreed the Freeport is able to draw down the funding approved. The Freeport is currently preparing a business plan for the 2023/4 financial year.
- 3.13 As set out in the FBC section 5.4 the Freeport partners have agreed to contribute to the operating costs of the Freeport, with the costs in the longer term to be borne by the public sector from the retained business rates which have been confirmed for 2023/4. The Freeport itself has prepared a draft Financial Business Plan which is being reviewed and will be finalised for reporting to the 26 September TFGB Board for approval in advance of being reported to Cabinet for approval. It is anticipated that the total cost can be contained within the £2.257m retained business rates now received from DLUHC. Further work will need to be undertaken to identify what these costs are likely to be. However, it is not proposed that the Council will have a legal liability under the MOU to meet these costs.
- 3.14 The risk to the Council is managed through the annual business planning and financial planning process. As part of the assessment process the Council will need to ensure that costs are within the budget envelope for the forecast retained business rates and that appropriate contingencies and mechanisms are in place to mitigate any shortfall in funding.

3.15 The resources required by the Council to fulfil its role as Accountable Body will be met by retained business rates. Work is underway to assess the additional resource requirement and cost associated with the Council's role in Thames Freeport. The Freeport itself has now prepared its costed business plan which is being reviewed ready for approval by the TFGB at its meeting on 26 September 2023 in advance of being reported to Cabinet for their approval. It is anticipated that the total cost can be contained within the £2.257m retained business rates now received from DLUHC, however full due diligence on the operating costs is currently being carried out. A final budget will need to be agreed through the annual business plan and financial plan to be approved by the Council as Accountable Body.

4. Reasons for Recommendations

4.1 The Freeport has been given final approval.

4.2 Ensuring appropriate governance and management systems are in place will enable the Council to fulfil the requirements of its role as the Accountable Body and to play its role in Freeport delivery effectively, efficiently and in a timely manner.

5. Consultation (including Overview and Scrutiny, if applicable)

5.1 Not applicable.

6. Impact on corporate policies, priorities, performance and community impact

6.1 Thames Freeport is a corporate priority and referenced in the Directions to Council from the Secretary of State.

7. Implications

7.1 Financial

Implications verified by: **Jonathan Wilson**
Acting Director of Finance and S151 Officer

Freeport Funding

Description	Budget	Actual
Capacity Funding	£1,000,000	£1,000,000
S31 Retained Business Rates funding	£2,257,000	£2,257,000 -
Seed Capital Funding – pending	£25,000,000	-
TOTAL	£28,257,000	£3,257,000

The Council has received Capacity Building funding totalling £1m from DLUHC over the period 2021 – 2023. This has been used, and is being used, to fund the development and set-up of the Freeport and the arrangements required to ensure that the Council can fulfil its role as Accountable Body. This includes commissioning external advisors to ensure that the requisite legal agreements are in place with the relevant partners.

The council has received a further £2.257m which will be used to fund the operating costs of the council and the Op Co in the initial phase of the Freeport programme. The council as Accountable Body will oversee the disbursement of these funds. The draft financial business plan submitted by Freeport is currently being reviewed before being submitted to TFGB for approval on 26 September. This will be reported to Cabinet for approval once finalised.

The Seed Capital funding of £25m will be disbursed based upon Outline Business Cases which will be subject to approval by DLUHC and Cabinet. These are on the forward plan for the October cabinet meeting.

Over the life of the Freeport programme, it is estimated that retained business rates of £956 million for Thurrock will be raised for reinvestment to deliver the objectives of the Freeport programme. All costs of the programme will be met from retained business rates.

Monthly financial monitoring of all aspects of the programme will be reported by the CFO (s151) to the Capital Board. The TFGB Board will also receive monthly financial reports.

The Accountable Body duties carry financial risks should these duties not be fulfilled satisfactorily, DLUHC has the right to clawback Freeport Seed Capital Grant monies totalling £25m as well as s31 grants. The Council is mitigating these risks by ensuring that the Accountable Body arrangements are robust and fully set up.

7.2 Legal

Implications verified by: **Gina Clarke**
Governance Lawyer and Deputy Monitoring Officer

Some of the legal implications relating to the Council's role as the Accountable Body for Thames Freeport are set out in the main body of the report.

As part of the process in establishing the Freeport, it will be necessary for the Council (acting as Accountable Body), the Thames Freeport Governing Body, and the rating authorities connected to the Freeport (the Council, London Borough of Barking and Dagenham, London Borough of Havering) to enter

into a Memorandum of Understanding (MOU) with DLUHC. The MOU will be updated with certain aspects of the consolidated Thames Freeport Final Business Case prior to the MOU's execution to cover membership, powers & decision-making mechanisms of the Thames Freeport Governing Body; the role and responsibilities of the Council as the Accountable Body; and the role and responsibilities of the billing authorities (the Council London Borough of Barking and Dagenham, London Borough of Havering).

The MOU will govern the working relationship between the parties to the agreement and sets out the mutual understanding of the governance model, grant funding arrangements/financial arrangements, strategic and Freeport delivery, reporting requirements and performance management of the Freeport.

The most recent version of the MOU received from DLUHC, version 10, which DLUHC has expressed as being the final form of MOU sets out the principles under which the Freeport is to operate. These principles are not legally binding on the Government and Freeport Partners.

A memorandum of understanding is a document which is usually seen as not legally binding. Case law suggests that the signing of a memorandum of understanding does not create a binding agreement, nor does it create a binding agreement when the parties begin to carry out its terms. DLUHC have confirmed in their feedback to issues raised on the MOU that they are satisfied that it remains an MOU and not a legal document. However, although not legally enforceable, it is agreed and expected that all parties to the MOU will conduct themselves in accordance with its terms in delivering the Freeport.

Regardless of the legal standing of the MOU, at all times DLUHC will have discretion to intervene if the Freeport fails to meet its obligations. The ultimate sanction for persistent failure being DLUHC's right to withdraw/withhold funding and/or other Freeport benefits.

The MOU places a number of direct non-binding obligations on the Council in its capacity as Accountable Body. The governance structure for Thames Freeport and contents of the MOU have been reviewed by external legal and they have identified several potential risks it may present to the Council acting in its capacity as Accountable Body, which are set out in **exempt Appendix 4**.

This highlights the need to ensure that appropriate mechanisms are in place for the Council to have sufficient oversight of Freeport operations and a level of control in certain circumstances beyond that which it is currently afforded through its membership of the Governing Body and the MOU. This relates to external additions to those arrangements, such as exploring putting in place additional agreements with Thames Freeport Partners and the OpCo.

The proposed recommendations set out in the report aim to ensure that the adequate structures are established within the Council to ensure that its role as the Accountable Body can be carried out effectively.

7.3 Diversity and Equality

Implications verified by: **Rebecca Lee**
Team Manager – Community Development and Equalities

A full Equalities Impact Assessment (EQIA) was completed as part of the FBC process considered by Government and aligned with Council's Community Equality Impact Assessment process. This provided a focus on the extent to which Thames Freeport will positively impact on reducing inequalities overall, not least those related to employment, income, health, and well-being. The EQIA/CEIA is a live document owned by the council working both in its role as accountable body and with partners to maximise benefits for residents overall.

7.4 Other implications (where significant) – i.e., Staff, Health Inequalities, Sustainability, Crime and Disorder, and Impact on Looked After Children

None

8. Background papers used in preparing the report (including their location on the Council's website or identification whether any are exempt or protected by copyright):

- Thames Freeport Full Business Case and Addendum - EXEMPT
- Cabinet Report: Thames Freeport: Governance Structure, 7 December 2022 [Thames Freeport: Governance Structure](#)

9. Appendices to the report

- Appendix 1: Council Governance and Freeport Governance Structure
- Appendix 2: Freeport Consolidated Business Case - Exempt Appendix comprising of 475 pages will be sent to members
- Appendix 3: Obligations imposed on the Council acting as the Accountable Body for the Freeport
- Appendix 4: Legal risks – Exempt Appendix
- Appendix 5: Seed Capital Project – Exempt Appendix
- Appendix 6: Seed Capital Project – Exempt Appendix
- Appendix 7: Seed Capital Project – Exempt Appendix
- Appendix 8: Seed Capital Project – Exempt Appendix
- Appendix 9: Seed Capital Project – Exempt Appendix

Report Author:

Gina Clarke
Corporate Governance Lawyer and Deputy Monitoring Officer

Law and Governance