

# Scrutiny Committee

Report of Head of Development and Regeneration

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To: Scrutiny Committee

DATE: 29 November 2018

## Draft Community Infrastructure Levy Spending Strategy

### Recommendation

The committee is invited to comment on the draft community infrastructure levy spending strategy as attached at appendix one.

### Purpose of Report

1. The purpose of this report is to seek comments on the draft spending strategy for income generated by the Community Infrastructure Levy (CIL), adopted by the council in November 2017.

### Strategic Objective

2. To support multi sectoral infrastructure development in the district in line with needs generated by new housing developments, sharing the funds available, after town and parish council transfers, according to council infrastructure priorities.
3. Our Corporate Plan Strategic Objective for housing and infrastructure says we will maximise contributions from housing development towards road improvements, public transport, health, education and other infrastructure, ensuring that funding is directed towards the most effective schemes.

## Background

4. The recently approved restructure splits the collection and spending of S106 and CIL between the planning service (collection) and the infrastructure and development team within the development and regeneration service (spending).
5. The infrastructure and development team will focus on ensuring effective spending and support to town and parishes to ensure infrastructure is delivered, including the possibility of providing parishes with approved projects on which they can spend allocated CIL funds. A system of monitoring will be established as a core function to ensure compliance with statutory CIL regulations and financial accountability.
6. To support the continued housing growth in the Vale of White Horse there is a need to ensure the appropriate infrastructure is in place to support development. To help fund this, developers pay a CIL on new housing or retail developments to contribute towards the infrastructure supporting such developments. The current charging schedule is being reviewed as part of the Local Plan process.
7. The CIL can only be used to fund infrastructure items as set out in our September 2017 Regulation 123 list (appendix one) which sets out the type of infrastructure CIL can be used for.<sup>1</sup>This list is derived from our December 2016 Updated Infrastructure Delivery Plan (IDP) which is updated alongside our Local Plan.
8. CIL has not fully replaced Section 106 (S106) planning obligations. These will continue to be used for infrastructure needs such as on-site open space, allotments, play areas, playing pitches, public transport, recycle bins, street naming and securing affordable housing on specified S106 designated developments. Currently these sites are:
  - a. North of Abingdon on Thames
  - b. North West of Abingdon on Thames
  - c. North West of Valley Park
  - d. Sites in CIL Zone 3<sup>2</sup>
9. The CIL Regulations do not set out governance arrangements for the council, however they are clear that we have:
  - i. a duty to pass to any town and parish 25 per cent of the CIL revenues raised in those towns/parishes where there is an adopted neighbourhood plan, or 15 per cent, subject to a cap of £100 per existing council tax dwelling, where there is no neighbourhood plan;
  - ii. a duty to transfer the CIL income to the relevant town or parish council by 28 April and 28 October in any financial year;

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<sup>1</sup> Funds generated, save for the 5 per cent administration costs, cannot therefore cover salary or overhead costs of any body that is allocated funding.

<sup>2</sup> Sites which have been zero rated for CIL are Crab Hill, Didcot Power Station, East of Coxwell Road Faringdon, Grove Airfield, Land South of Park Road Faringdon, Monks Farm, North of Shrivenham, South Faringdon and Valley Park

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- iii. the ability to recover administrative expenses incurred in connection with CIL of up to five per cent of the income generated;
  - iv. to spend the levy on infrastructure, and
  - v. a duty to report on CIL income generated and how it is spent.
10. CIL expenditure aims at mitigating the infrastructure impacts of an individual development, as well as the overall cumulative effect of development. However, although CIL spending does not have to be directly spent on the individual development through which it was raised and can be used to support infrastructure expenditure in general. Whilst this gives the council a good degree of flexibility over how to prioritise its spending, public pressure may require funds to be spent as much as possible, in the location that the CIL revenues were generated.
11. The draft CIL strategy (appendix one) will be sent out for consultation in December with a cut-off date for responses to be set in January 2019. A summary of comments received, together with the council replies will be published on the council website.

### **Options for consideration**

12. The committee is requested to discuss the options regarding how to utilise CIL funding – three options are listed below for consideration, as set out in detail in appendix one.
- a) Allocating all council CIL funding to one particular project
  - b) Allocating funding to a small number of selected projects
  - c) A percentage allocation to OCC/Oxfordshire Clinical Commissioning Group (OCCG) and selected internal council departments

### **Financial Implications**

13. Expectations regarding the possible impact of CIL need to be actively managed. There is currently a significant infrastructure funding gap as indicated in the council's December 2016 Updated Infrastructure and Funding Report. CIL funding will only contribute to a small percentage of infrastructure needs.
14. An annual CIL spending cycle will need to be established once the spending strategy is agreed. If the officer recommended percentage allocation is approved by cabinet and allocations are apportioned to OCC, CCG, and certain council departments, this would need to be done in time for inclusion in the council annual budget setting process, with 1 April annual budget transfer payments being based on actual CIL funds available as at December the previous year. For council departments this would be allocated through the provisional capital programme budget process.
15. Any unspent funds from CIL revenues generated during 2017/18 will be added to CIL funds generated during 2018/19 and included in the first CIL transfer for the fiscal year 2019/20.
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## Legal Implications

16. A funding agreement will be drafted on an annual basis with the recipient organisation to outline the responsibilities of each party and to ensure that the funds are utilised in line with CIL regulations. Such an agreement will incorporate a list of projects that the funding will be spent on, within set timescales. This will be monitored by the infrastructure and development team. Funds not spent or mis-spent will be returned to the council or deducted from future transfers.

## Risks

17. Funds may be mis-spent or not spent at all within the allocated timeframe. To mitigate this risk the infrastructure and development department will monitor funding agreements regularly.

## Other Implications

18. Should the option of supporting a small number, or even one project, in which to invest all CIL funds, this would need to be justified in detail in order to illustrate how this option would be preferable, and to what extent the selected project or projects would be beneficial, and to which town or parishes.

## Conclusion

19. The CIL spending strategy provides options in terms of how to use the CIL revenues generated. Officers recommend a percentage-based funding allocation procedure that systematically calculates funds to be annually transferred to relevant partners and council departments, based on actual funds received and currently unspent.

20. The recommended allocation of funding for 2018/19 would be as follows:

<b>Infrastructure type<sup>3</sup></b>	<b>Percentage of CIL to be allocated</b>
<b>OCC:</b>	
Education and transport infrastructure	50%
<b>CCG</b>	
Community Health Care	20%
<b>SODC:</b>	
Sports and Leisure facilities (incl. improved disabled access)	20%
Green Infrastructure/Biodiversity provision	5%
Public art and cultural heritage/Public realm (including disabled access)	5%
<b>TOTAL</b>	<b>100%</b>

21. These percentages would be reviewed on an annual basis based on performance and council infrastructure priorities.

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<sup>3</sup> Any infrastructure provided as a result of CIL, where relevant, should comply with the Local Plan Policies, Design Guide, and current best practice accessibility standards.

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22. Such an approach be piloted for two years, with a review by scrutiny committee and cabinet after one year to ensure compliance in terms of achieving CIL objectives and to assess the effectiveness of the Strategy.
23. The committee is invited to make comments on the draft community infrastructure levy spending strategy.

## **Background Papers**

- The council's updated Infrastructure Delivery Plan December 2016
  - The council's Local Development Scheme 2018-2020
  - The council's updated Infrastructure and Funding Report December 2016
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# Appendix One: Draft Community Infrastructure Levy – Spending Strategy

## Background

1. To support the continued housing growth in the Vale of White Horse there is a need to ensure the appropriate infrastructure is in place to support development. To help fund this, developers pay a CIL on new housing or retail developments to contribute towards the infrastructure supporting such developments. The current charging schedule is being reviewed as part of the Local Plan process.
2. The CIL revenue can only be used to fund infrastructure items as set out in our September 2017 Regulation 123 list (Appendix 1) which sets out the type of infrastructure CIL can be used for.<sup>4</sup> This list is derived from our December 2016 Updated Infrastructure Delivery Plan (IDP) which is updated alongside our Local Plan.
3. The recently approved staff restructure splits the collection and spending of CIL revenues between the planning service (collection) and the infrastructure and development team within the development and regeneration service (spending).
4. The infrastructure and development team will focus on ensuring effective spending and support to town and parishes to ensure infrastructure is delivered, including the possibility of providing parishes with approved projects on which they can spend allocated CIL funds. A system of monitoring will be established as a core function to ensure compliance with statutory CIL regulations and financial accountability.
5. CIL has not fully replaced Section 106 (S106) planning obligations. These will continue to be used for infrastructure needs such as on-site open space, allotments, play areas, playing pitches, public transport, recycle bins, street naming and securing affordable housing on specified S106 designated developments. Currently these sites are:
  - a. North of Abingdon on Thames
  - b. North West of Abingdon on Thames
  - c. North West of Valley Park
  - d. Sites in CIL Zone 3<sup>5</sup>
6. A table is attached at Appendix 2 which details examples of the main differences between how planning obligations (S106) and the CIL can be used.
7. CIL only accounts for a small proportion of a site's overall development costs. Other factors such as the amount of affordable housing required or enabling infrastructure needs and value will have a considerable impact on viability. A

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<sup>4</sup> Funds generated, save for the five per cent administration costs, cannot cover salary or overhead costs of any body that is allocated funding.

<sup>5</sup> Sites which have been zero rated for CIL are Crab Hill, Didcot Power Station, East of Coxwell Road Faringdon, Grove Airfield, Land South of Park Road Faringdon, Monks Farm, North of Shrivenham, South Faringdon and Valley Park

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diagram showing viability options is attached at Appendix 3 to give more details.

8. The CIL Regulations do not set out governance arrangements for the council, however they are clear that we have:
  - i. a duty to pass to any town and parish 25 per cent of the CIL revenues raised in those towns/parishes where there is an adopted neighbourhood plan, or 15 per cent, subject to a cap of £100 per existing council tax dwelling, where there is no neighbourhood plan;
  - ii. a duty to transfer the CIL income to the relevant town or parish council by 28 April and 28 October in any financial year;
  - iii. the ability to recover administrative expenses incurred in connection with CIL of up to five per cent of the income generated;
  - iv. to spend the levy on infrastructure, and
  - v. a duty to report on CIL income generated and how it is spent.
  
9. CIL expenditure aims at mitigating the infrastructure impacts of an individual development, as well as the overall cumulative effect of development. However, although CIL spending does not have to be directly spent on the individual development through which it was raised and can be used to support infrastructure expenditure in general. Whilst this gives the council a good degree of flexibility over how to prioritise its spending, public pressure may require funds to be spent as much as possible, in the location that the CIL revenues were generated.
  
10. Expectations regarding the possible impact of CIL need to be actively managed. There is currently a significant infrastructure funding gap as indicated in the council's December 2016 Updated Infrastructure and Funding Report replicated below.<sup>6</sup> As can be seen the CIL income will not come close to filling this gap, and therefore it is clear that some infrastructure needs will not be met. CIL funding can only be expected to contribute to a small percentage of infrastructure needs.

Table 1: CIL income in the context of total infrastructure:

Total assessed infrastructure	£ 463,260,016
Other sources of income	£ 306,248,122
Funding Gap	£ 157,011,894
Total expected CIL income	£ 60,314,580
CIL income as a proportion of total assessed infrastructure	13%
Residual funding gap	£96, 697,314

### **CIL Spending Strategies – what other councils are doing**

11. There are several councils that have adopted CIL Charging Schedules and developed a CIL Spending Strategy. Some councils use a bidding process within a defined set of parameters, which is administered by officers. Bids are assessed against infrastructure needs (set out in the IDP and Regulation 123 List) and their likely deliverability.
  
12. Other councils have allocated funds on a percentage basis for key infrastructure types set out in the IDP (e.g. education, transport, town centre

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<sup>6</sup> Updated Infrastructure and Funding Report, December 2016. Page 6, Table 4.

improvements etc.) or by the type of use that generated the CIL income (e.g. residential or retail). The IDP and Regulation 123 list are updated on an annual basis. Most councils have linked their CIL Spending Plan to their Capital Programme. In all cases the Spending Strategy is approved annually by the cabinet and the council.

## CIL income

13. During the first financial year from November 2017 to 31 March 2018, the council received CIL payments of £ 70,014.12. The CIL payments only become due once a development has started and for liabilities over £50,000 developers can spread payments over three years. There will always be a gap between the amount demanded and funds received.
14. By May 2018 CIL transfers of £5,380.17 were transferred to four different town and parishes (see appendix 4 for details). Regarding the maximum five per cent allocation of CIL revenue for administration expenses, £3,500.70 has been utilised for 2017/18.
15. Expected CIL income, estimated in December 2016, based on the updated infrastructure and funding report, is projected at approximately £60 million<sup>7</sup> over 20 years i.e. £3 million per annum. Estimating future CIL incomes annually is difficult as the charging rate although fixed is index linked and will therefore change over time, some developments may be delayed, and some expected developments may never get started. Therefore, the annual amount of funds generated will fluctuate dependent on the amount of new developments started in that year plus the rate of payment of CIL charges that have been carried forward from previous years.
16. In order to simplify the allocation process officers suggest that funds available for CIL spending will be based on actual amounts received, less transfers to town and parishes and administrative costs incurred. Funds currently available are set out in the council's CIL Annual Financial Statements.<sup>8</sup> To comply with the council's budget setting process the actual amount of CIL funds available at each December year end will be used as a basis for calculating the allocation amounts.<sup>9</sup>

## Historic S106 spending

17. Whilst not directly comparable, the type of funding secured through S106 and spent by infrastructure type during the five years prior to the adoption of CIL in November 2017 is detailed in Table 2 as a useful guide:

Table 2: Percentage of S106 funds expended per infrastructure type

OCC Education	51%
OCC Transport (public transport, right of way, highways, transport infrastructure)	15%
OCC Other services (adult learning, library, museum, day care, waste, youth services)	3%

<sup>7</sup> Updated Infrastructure and Funding Report, December 2016. Page 6, Table 4: total CIL income - £60,314,580

<sup>8</sup> Generated by the planning service who track all invoiced and received CIL payments.

<sup>9</sup> Fiscal year end actuals would arrive too late for budgeting timings.

VOWH Leisure facilities	9%
Open Space	8%
Affordable Housing	7%
Parishes	4%
Public art	1%
Others	2%

18. The largest proportion has been secured for the provision of education at 51 per cent, and transport at 15 per cent, planned for or provided by Oxfordshire County Council (OCC) (69 per cent in total including other services). The council also funds other activities for which the largest allocation was on leisure facilities, nine per cent, open space, eight per cent, and affordable housing seven per cent.

### **Options for consideration**

19. Officers have considered a range of options in drafting the proposed strategy, these include:

#### **a) Allocating all council CIL funding to one project**

20. As the amounts involved, especially initially, are unlikely to be significant, rather than spreading the funding across a number of small scale items the option of putting all the available CIL funds into one identified project that could be beneficial to as many town or parishes as possible within the district could be considered.

21. Using this option would require a clear evidence basis to why the council opted for one particular project against another to fund and how the funds from particular development sites are justified to be spent in different area, which could even be a project outside of the district.

#### **b) Allocating funding to a small number of selected projects**

22. The reasoning as detailed above would be the same but over a number of identified specific projects across the district.

#### **c) A percentage allocation to OCC/Oxfordshire Clinical Commissioning Group (OCCG) and selected council departments**

22. The advantage of allocating a percentage of CIL revenues towards key infrastructure types is that it:

- i. provides clarity for OCC/ OCCG so they can plan ahead and meet infrastructure needs for which they are responsible.
- ii. enables the relevant internal council departments to incorporate funds into their annual strategies and plans.
- iii. will give the wider community the confidence that necessary infrastructure will be provided either by the town or parish or other CIL recipients.
- iv. negates the requirement for a bidding process to take place, saving time and resources.

23. Once the 15 or 25 per cent allocations for the town or parishes, and the maximum five per cent for CIL administration costs have been deducted, the balance remains with the council to be utilised. Taking into consideration historical percentages set out in Table 1 and incorporating the intended

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infrastructure expenditures in the council's Infrastructure Delivery Plan of December 2016, and comments from key council officers' recommendations on percentage allocations, split by OCC, OCCG, and the council expenditures, for the different infrastructure types, are set out in Table 3 below. Please note that as this is the first CIL Spending Strategy, there is no specific precedent on which to base percentage allocations. A collective agreement approach has been adopted to arrive at unbiased percentages for all parties concerned but these can be flexible. The possibility of having a contingency fund was considered, however, officers consider that this would not work within the current allocation process and would generate significant additional administration costs.

Table 3: Proposed percentage allocation of CIL

<b>Infrastructure type</b>	<b>Percentage of CIL available</b>
<b><u>OCC:</u></b>	
Education and transport infrastructure	50%
<b><u>OCCG:</u></b>	
Community Health Care	20%
<b><u>VOWH:</u></b>	
Sports and Leisure facilities (including improved disabled access)	20%
Green Infrastructure/ Biodiversity provision	5%
Public art and cultural heritage/Public realm (including access for disabled)	5%

#### **Oxfordshire County Council:**

24. During consultation OCC have requested that a certain percentage of the funding would need to be shared with them to ensure the broader provision of infrastructure items, identified as part of general development needs, but restricted to transport and education only. As per Table 3, OCC's suggested allocation of CIL would be 50 per cent.
25. A memorandum of Understanding (MoU) between the council and OCC would need to be outlined in this respect agreeing how CIL funds transferred to OCC will be spent. This would be revised annually. The amount to be transferred will be calculated on an annual basis. The amount should be included in our annual financial budget and released in either a lump sum annual payment or quarterly as per the agreement reached.
26. OCC would complete a request for CIL funding form (appendix 5) annually in order to draw down the allocated funding. This request would be subject to set criteria:
  - meet the requirements of CIL Regulations
  - address the needs identified in our Infrastructure Development Plan
  - be fully costed
  - be deliverable within a specified timescale.

## **NHS Clinical Commissioning Groups (OCCG):**

27. Similarly, following consultation with OCCG, they have requested that a certain percentage of the funding would need to be apportioned to the health sector to ensure that the provision of health care can also be increased in line with the demand generated by the increased number of residents in a location. As per Table 3, OCCG's suggested allocation of CIL revenue for expenditure would be 20 per cent. The same procedures as OCC would need to be applied in terms of agreeing a MoU, and annual budget allocations and requests for funding.

## **The Council's allocation**

28. Our allocation will be spent in line with department spending strategies and priorities. Any allocations not utilised by the year end could be transferred to other council departments, as deemed appropriate in accordance with council financial procedures and rules. Any amounts unspent at the end of the year will be returned to the CIL budget to be utilised the following year.
29. It is important to note that developments liable for S106 planning obligations (North of Abingdon on Thames, North West of Abingdon on Thames, and the North West of Valley Park, plus those sites listed in CIL Zone 3<sup>10</sup>) will continue to secure funding for on-site specific infrastructure needs, as well as an element of offsite infrastructure, subject to current pooling regulations. Strategic sites will continue to deliver key infrastructure on site, such as new schools, transport improvements, health provision, leisure and community facilities.

## **Town and Parishes**

30. It should be noted that a significantly larger proportion of infrastructure monies will be going to town or parishes than historically secured via S106 funding. With this additional funding the town or parishes will therefore be expected to support both projects identified in their neighbourhood plans, where available, as well as other local infrastructure improvements such as items as set out in our September 2017 Regulation 123 list (Appendix 1) which sets out the type of infrastructure CIL can be used for.<sup>11</sup> This list is derived from our December 2016 Updated Infrastructure Delivery Plan (IDP) and is updated in line with the Local Plan.
31. Should town or parishes wish to support projects at a district level, and should town/parish clerks have the relevant qualifications that enables them to do so, then guidance notes are already available from the Oxfordshire Association of Local Councils (OALC).<sup>12</sup> These will be promoted to the relevant town and parish councils.

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<sup>10</sup> Sites which have been zero rated for CIL are Crab Hill, Didcot Power Station, East of Coxwell Road Faringdon, Grove Airfield, Land South of Park Road Faringdon, Monks Farm, North of Shrivenham, South Faringdon and Valley Park

<sup>11</sup> Funds generated, save for the five per cent administration costs, cannot cover salary or overhead costs of any body that is allocated funding.

<sup>12</sup> CIL – OALC guide for parish councils, October 2018.

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32. It will be important to establish strict monitoring practices to ensure the CIL allocations are spent on the relevant infrastructure required. This role will be fulfilled by a “CIL support and infrastructure implementation officers” who will monitor the use of funds whilst also supporting the town or parishes in the usage of their allocated funds. These roles will be funded from the CIL five per cent administrative support charge.

### **CIL Spending Strategy Timetable**

33. A proposed timetable for the finalisation of the CIL Spending Strategy is set out in Table 4 below:

Table 4: Proposed timetable for CIL Spending Strategy:

November 2018	Scrutiny Committee consider draft strategy
December 2018	ICMD to approve the draft Spending Strategy to be sent out for consultation (4 weeks).
January 2019	Review of consultation results
January 2019	Formal Cabinet approval of CIL Spending Strategy
January 2019	Calculation of December 2018 year end unspent CIL balance for the financial year 2019/20 for inclusion in the council's annual budget.
January/ February 2019	Dependent on the option chosen, selection of projects to be supported or recipient organisations or departments to which funds would be allocated.
April 2019	Transfer of CIL funds to relevant budgets or recipients
April – Dec 2019	Monitoring of CIL spend

### **Link CIL Spending Strategy to Capital Programme**

34. CIL is just one funding stream that can be used in conjunction with others to fund infrastructure projects. The CIL spending estimates should be included in the council's capital programme and approved as part of the council's budget setting each February. The advantage of linking the CIL funded spending estimates to the council's capital programme is to ensure a full overview of the key infrastructure projects supported under various funding streams and the identification of any gaps.
35. Annual budget allocations will be made to OCC, OCCG, and the relevant internal council departments based on December year end actual CIL funds generated, less transfers made to parishes and a five per cent administration cost deduction. Any amounts unspent will be returned to the CIL budget to be reallocated the following year. There will be no other additional budget requirement.
36. The budgetary allocation of the five per cent administration costs will be split evenly between CIL revenue management i.e. invoicing developers and tracking collection, and CIL spending and monitoring.

### **Can the levy be spent outside the Vale of White Horse?**

37. There have been incidences of other councils requesting S106 money for infrastructure projects outside their administrative areas, particularly where a
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new development lies on or close to our administrative borders. However, we advise that the council limits such arrangements, neither initiating nor accepting such proposals.

**Can the CIL funds be spent outside the development area where they were generated?**

38. Yes. Funds will be spent as much as possible, in the location where the CIL revenues were generated. However, where there is an identified need for larger infrastructure facilities, that also benefit a wider area and a large proportion of the population, this will be considered reasonable.

**Reporting of CIL**

39. Both the council and the town or parishes are required to prepare an Annual Monitoring Report in relation to CIL income and expenditure (Financial Statement) and publish it on its website no later than 31 December each year for the proceeding financial year. Town and parishes also have to produce and send a copy of their annual report on their spending of CIL monies to the council. Please see appendix 6 for the reporting format. We would publish this information on our website. CIL monies passed on to town or parishes, which have not been spent within five years of receipt can be recovered by the council who then must spend such CIL monies to support the development of the area which they have been recovered from.

**Recommendation:**

40. Officers recommend that the proposed CIL spending strategy utilise a percentage allocation approach, apportioning funds on an annual basis, calculated on available actual funds, once town or parish allocations and council administrative costs have been deducted. The reasons for this recommendation are detailed above in paragraph 22.

41. Table 5 below details the officers recommended percentage allocations.

Table 5: Proposed CIL percentage allocations:

<b>Infrastructure type<sup>13</sup></b>	<b>Percentage of CIL to be allocated</b>
<b>OCC:</b>	
Education and transport infrastructure	50%
<b>OCCG</b>	
Community Health Care	20%
<b>VOWH:</b>	
Sports and Leisure facilities (incl. improved disabled access)	20%
Green Infrastructure/Biodiversity provision	5%
Public art and cultural heritage/Public realm (including disabled access)	5%
<b>TOTAL</b>	<b>100%</b>

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<sup>13</sup> Any infrastructure provided as a result of CIL, where relevant, should comply with the Local Plan Policies, Design Guide, and current best practice accessibility standards.

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42. Appendix 7 provides an overview of how this proposed spending approach would work operationally.
  43. Officers recommend that such an approach be piloted for two years, with a review by scrutiny and cabinet after one year to ensure compliance in terms of achieving CIL objectives and to assess the effectiveness of the Strategy.
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