

Item No.	Classification: Open	Date: 18/02/2010	Meeting Name: Overview & Scrutiny Sub-Committee
Report title:		PLANNING ENFORCEMENT	
Ward(s) or groups affected:		All	
From:		Head of development management	

RECOMMENDATION

1. The purpose of this report is to enable the sub-committee to understand the work undertaken by officers in order to shape discussion on the review of planning enforcement function.

BACKGROUND INFORMATION

2. Planning enforcement in Southwark undertaken primarily by the planning enforcement team within the Development management business unit within the Planning and transport division of the Regeneration and neighbourhoods department. The team has an establishment of seven comprised of 1x group manager, 1x team leader, 1x senior enforcement officer, 2x enforcement officer, 1x special projects officer, and 1x trainee planning officer. There is presently one vacancy (enforcement officer) within the team.
3. Between 2005 and 2009 staffing levels varied due to the reliance on agency staff and a high turnover. Such variation in resourcing resulted in low levels of enforcement against certain breaches of planning control such as unauthorised places of worship, large format outdoor advertisements, unauthorised satellite dishes and fascia signs along high streets and major thoroughfares. This has resulted in a significant backlog which the team has to balance against current cases.
4. The investment made by members into the team in FY0708 was welcome and resulted in growth in the team resources to its current establishment.
5. The following changes and service improvements were made within the previous three years:
 - reduction and clearance of the enforcement backlog (including outstanding non-compliance with enforcement notices)
 - greater emphasis on pro-active initiatives to deal with breaches related to unauthorised faith premises, advertisements, satellite dishes in conservation areas and on listed buildings, and unlawful development in high streets and thoroughfares
 - improving timeliness and consistency of approach in carrying out investigations and increased use of enforcement notices, prosecution and direct action
 - adopting an area based approach to enforcement
 - immediate referral of refused or withdrawn retrospective planning applications to the enforcement team

- actively developing working relations with other Council units and agencies to share information and foster joined up working
 - quarterly reporting to community councils
 - publishing guidance on planning controls to encourage compliance with planning regulations
6. Some stability has now been achieved in the workforce through reduced staff turnover but there is still a high dependency on agency staff in the team. Given the budget constraints, the emphasis is on doing more with available resources and improving on work processes.
 7. In line with corporate policy, the team is seeking to reduce the number of agency staff through the recruitment of permanent staff.
 8. The figures in Appendix 1 shows general improvement in planning enforcement performance since 2005 in terms of the number of cases resolved and closed, enforcement notices issued, appeals, prosecutions and direct action. There has been a significant improvement in the success rate in defending enforcement notices on appeal and Southwark now has one of the best records in London. This is a reflection of both the quality of notices being served and of legal advice provided to the team. A number of the appeal decisions were selected for publication as notable results in the Planning, the weekly national magazine of the Royal Town Planning Institute (Appendix 2).

RESPONSES TO ISSUES RAISED

Prompt Response Once Apparent Breach Discovered By Officers/Notified by Members

9. Promptness in responding to alleged breaches of planning control has been a function of identified priorities, agreed targets, proportionality and expedience of taking enforcement action having first taken into account available guidance and advice.
10. The planning enforcement database (ACOLAID) is currently being updated in order for the effectiveness of the service to be measured, monitored and reported in terms of:
 - Dates of site visits
 - Completion of the first phase of investigations
 - Formal enforcement action undertaken
 - Number of appeals, prosecutions and direct action
 - Closure or resolution of cases
 - Customer care
11. The current procedure for investigations allows all development management staff to report contraventions or breaches of planning legislation by notifying the enforcement team using the Enforcement Investigation Form (Appendix 3).
12. Breaches of planning control are received mainly from:
 - (i) the public and members orally by telephone, by post or via email
 - (ii) following refusal of planning permission on retrospective applications
 - (iii) other units, e.g. building control, environmental protection, and licensing
 - (iv) pro-actively identified by officers

13. The planning enforcement team uses the group email address: planning.enforcement@southwark.gov.uk allowing enquiries to be picked up and responded to promptly.
14. The complaints are then investigated in accordance with the planning enforcement processes and procedures adopted on 3 March 2002 (Appendix 4) which are published on the Southwark website.
15. Enforcement officers are responsible for reviewing the relevant planning history; arranging an initial site visit/contact to verify the breach of planning control; serving a planning contravention notice if need be; notifying the Builder/Owner/developer of any contravention and advising on remedial action; updating complainants on progress; monitoring decisions on retrospective planning applications; evaluating the need for formal enforcement action; preparing reports recommending enforcement action to the Delegated Officer; sending instructions to legal to issue enforcement notice(s) once the delegated authority is obtained; defending enforcement notices on appeal through preparing statements of case and appearing as witnesses in informal hearings and public inquiries; preparing witness statements for prosecutions in court; preparing reports to take direct action in default; attending relevant interdepartmental/joint meetings; and preparing reports to close cases where there is no breach of planning control or where unauthorised development has been regularised.
16. Benchmarking against other London boroughs shows that unlike in Southwark some planning enforcement teams do not deal directly with enforcement appeals. In such cases a dedicated officer is responsible for these legally complex, often protracted and time consuming stages of planning enforcement.
17. However, having officers dealing with the entire process from complaint to court allows for greater control and consistency, and provides for better results. It follows that in Southwark there is a greater demand on officer time in dealing with appeals and prosecutions.
18. Planned system updates (ACOLAID) will provide better monitoring of team performance by measuring the following targets:
 - initial acknowledgement to all written complaints within 3 working days
 - target decision date (8 weeks from reception date)
 - target site visit
 - (high priority - 1st contact/visit within 24 hours)
 - (medium priority - 1st contact/visit within - 5 days)
 - (low priority - 1st contact/visit within 10 days)
 - target initial acknowledgement of complaint (within 3 days of receipt)
 - target initial update (28 days from reception date)
 - target action plan update (8 weeks from reception date): Where formal legal or enforcement action is taken, complainants will be notified simultaneously with the action, or at most within 3 working days following that action
 - target for issuing enforcement notice (within 2 weeks of instructions to legal)
 - target for issuing temporary stop notice (within 24 hours of instructions to legal)
19. Case Study: The Meat & Fish Market at 1-4 Holly Grove, Peckham, London SE15 5DF has been identified as an example of lack of pre-emptive action on the part of planning enforcement. The facts of the case are:

- **Alleged Breach:** Without the benefit of planning permission, the material change of use of the ground floor of the Premises from light industrial use (Class B1 of the Town and Country Planning (Use Classes) Order 1987) to a retail use (Class A1 of the Use Classes Order); more particularly, the use of the ground floor of the Premises as a meat and fish market.
 - **Actions Taken:** A retrospective planning application submitted soon after the breach had been reported. Enforcement action held in abeyance pending a decision on the planning application.
 - **Outcomes:** Retrospective planning permission was subsequently refused, and an enforcement notice and stop noticed served resulting in the unauthorised use stopping. An appeal against both the refusal of planning permission and enforcement notice was dismissed and the notices upheld.
 - **Lessons Leant:** Issuing of a temporary stop notice or other formal action normally not pursued where an application has been submitted.
20. Members might wish to consider whether sufficient information in being publicised on how to report breaches of planning control, the procedure for investigating reported breaches, the role and responsibilities of enforcement officers and target dates. Is the information published on the web (as in appendix 4 sufficient?). Additional information has been provided to community councils on how residents can identify and report breaches of planning control (Appendix 5).

Criteria for Identifying Priorities & Who Decides?

21. The initial prioritisation of a complaint is based on the perceived effect/harm of the breach of planning control and is the responsibility of the Head of Development Control and the Enforcement Manager based on the following order of priorities:
22. **Priority One – High** (works causing serious harm) – First contact or site visit within 24 hours of receipt of complaint: Works that are irreversible or irreplaceable or constitute a serious breach of planning control; Unauthorised works to a Listed Building; Breaches of Article 4 Directions; Significant development within or on Metropolitan Open Land; Unauthorised development causing serious harm to the character and appearance of a conservation area; Unauthorised development (building operations and change of use) that seriously affect the vitality and viability of shopping parades.
23. **Priority Two – Medium** – First contact or site visit within 5 working days from receipt of complaint: activities that cause significant harm to residential amenity; change of use without any serious impacts; unauthorised development (building operations and change of use) that affect the vitality and viability of shopping parades; untidy sites – neglect of the environment with a wide impact; previously undetected, unauthorised developments where the time limit for enforcement soon expires ; any breach of planning control causing a limited degree of disturbance to local residents or the environment; breach of conditions and/or not built in accordance with approved plans; Unauthorised advertisements; and general compliance checks.
24. **Priority Three – Low** – First contact or site visit within 10 working days from receipt of complaint: sheds, means of enclosure; dropped curbs/crossovers; satellite dishes; minor operations; estate agent boards; and any low impact to residential amenity.

25. Officers believe that the prioritisation above provides for the most efficient and effective use of Council resources and would appreciate Members' views on whether the current prioritisation provides for an effective use of limited resources. It is not feasible to categorise all the potential breaches of planning control into these priority groups. The final decision on the priority given to an investigation lies on the seriousness of perceived and potential harm.

Appropriate use of Pre-emptive Powers: Is an Overcautious approach taken towards SNs & TSNs?

26. The appropriateness of any pre-emptive action the team takes depends on the seriousness of breach of planning control based on the preceding prioritisation. Careful consideration of the use of the various enforcement tools is always made:
27. **Stop Notices:** Served any time after service of an enforcement notice to require unauthorised activities to cease permanently where the local planning authority consider it expedient that any relevant activity should cease before the expiry of the period for compliance with an EN. Table 3 in appendix 1 shows that four such notices have been issued in the current financial year.
28. **Temporary Stop Notices** – TSNs came into force on 7th March 2005 and are a serious enforcement power that should only be used in emergencies, where there is very serious harm to amenity and it is considered essential for the breach to stop immediately prior to the service of an enforcement notice. The effect of this power is similar to a mini injunction as TSNs allow for up to a 28 day cessation of the activity, a time during which all relevant matters can be reflected upon before deciding whether to pursue further action. Over the past five years, the Council has served fifteen such notices. Officers value the additional powers provided by TSNs but are also aware that government guidance on this matter states that the potential for compensation set out within section 171H should not be overlooked.
29. This power should only be used as a last resort if on balance the harm to the amenity at stake is greater than the infringement upon individuals' right to use their property. The use of this power therefore requires careful consideration and the LPA is required to undertake a cost/benefit analysis in accordance with the Circular guidance when considering taking this action. Compensation can be payable, amongst other things, if the specified activity is authorised by a planning permission, development order or local development order; a certificate of lawful existing use/development is issued or if the authority withdraws the notice.
30. As a result, decisions to issue TSNs follow careful consideration of all the available information including legal advice. All of the 15 TSNs issued over the period 2006 to 2009 were complied with, with no claims for compensation made. In short, the use of temporary stop notices is carefully assessed based on the merits of each case.
31. **Injunctions:** Section 187B of the 1990 Act provides that where a local planning authority considers it necessary and expedient for any actual or apprehended breach of control to be restrained by injunction, they may apply to the court for an injunction, whether or not they are proposing to exercise any of their other powers under the part. In many cases, authorities use injunctions at the end of a long process of enforcement action. Quite often, it can be used as a final push when

ENs or BCNs have been issued but are not complied with. It must be stressed that this course of action is only used in extreme cases.

32. **Case Study:** Bushey Hill Road. The threat of an injunction, it appears, normally spurs contraveners to act. However, officers do not hesitate to pursue such action where there is clear justification.
- **Alleged Breach:** Breach of Condition 11 of planning permission dated 14 December 2006 Case Number 06-AP-0645. “The access from Peckham Road shall not be used at any time or for any purpose to provide a vehicular access into, through or across the site.” The access way was too narrow and its use by large construction vehicles was causing serious loss of amenity to adjoining occupiers.
 - **Actions Taken:** Temporary stop notice, enforcement notice and full stop notices issued.
 - **Outcomes:** Breach stop and latter resumed and officers considered seeking an injunction. Legal services established initial contact with contravener resulting in the unauthorised access to stop.
 - **Lessons Leant:** Injunctions are a powerful tool and often the threat of an injunction produces the desired results.
33. **Other Enforcement Action:** Table 3 in appendix 1 shows that over the period 2006-2010, 359 separate pieces of legal action were pursued in terms of enforcement notices, breach of condition notices, planning contravention notices, section 215 notices, discontinuance notices and s11 notices. A number of these resulted in criminal prosecutions when the notices were not complied with as shown in appendix 1.
34. In response to Members’ concern of a lack of pre-emptive action, officers believe that full use is being made of the available enforcement powers. Officers are able to provide to residents and members detailed reports (when requested) explaining the preferred course of action on any investigation in addition to the quarterly reports to Community Councils.
35. However, lessons drawn from past cases show that the following issues reduce the scope for timely resolution of breaches:
- i. Breaches of planning control by other Council departments and subsequent lack of cooperation in trying to resolve the breaches
 - ii. Lack of timely submission of applications as requested to regularise sites that are subject to enforcement action
 - iii. Contraveners delay in replying to letters sent to them and then delaying taking action on matters that would not always be subject to actual enforcement action i.e. not expedient to do so due to the minor nature of the complaint
 - iv. The past high turnover of staff resulted in lack of continuity in investigations on some cases
 - v. Failures to pursue minor infringements such as satellite dishes in conservation areas, unauthorised estate agents boards, etc

- vi. Limited opportunity to monitor development and conditions (especially pre-commencement). There are no national or local procedures for checking that developments take place in accordance with approved development plans. Monitoring of conditions, planning agreements and development as it progresses on site is a desirable function of the Development Management Service. There is no requirement for a developer to notify the Council as Local Planning Authority of commencement of most developments once planning permission has been granted. This can mean that comprehensive monitoring whilst desirable is not always practicable.
- vii. The need to monitor pre-commencement conditions is imperative especially where conditions are imposed to safeguard archaeological remains from development. The Queens Road cases quoted in the background papers are a good example of how arduous it is to enforce archaeological conditions once breached as any archaeological remains would have been lost. The team aims to explore the scope of:-
 - checking all Building Regulation plans to ensure that they comply with the relevant planning permission and identify any instances where planning permission is required but has not yet been sought;
 - writing to applicants on receipt of monthly notification from Building Control of all commencements of development, and write to applicants to remind them to carry out their development as approved and, where conditions are imposed requiring approval of further details, to specifically draw these to the attention of the applicant.
 - writing to applicants on receipt of monthly notification from Building Control of all completions of development, and write to applicants reminding them of the need to ensure that there are no planning requirements outstanding.
- viii. In some cases, investigations have been delayed by the fact that some of the conditions imposed on planning permissions especially in past planning decisions were unenforceable.

Information Gathering from Residents

36. Officers are aware that the TCPA provides for immunity from enforcement action to unauthorised development after 4 years in the case of operational development and 10 years in the case of change of use and breach of planning conditions.
37. It is now standard practice for officers to check when a breach of planning control commenced at the time an enquiry is logged if this is not obvious. The same information is also obtained from the contraveners at initial contact or in the form of a planning contravention notice.
38. However as members might appreciate, successful enforcement against unlawful uses or structures arguing immunity to enforcement action often depends on factual information provided by residents, members and others with local knowledge.
39. In addition to establishing when unauthorised development commenced at the start of investigations, officers request for witnesses to come forward if immunity from enforcement is alleged and argued. This is imperative at public inquiries

where first hand evidence carries more weight if it corroborates the Council's case.

40. Accordingly, the initial log sheet (in appendix 1) has been amended to require anyone reporting a breach to provide an approximate date of commencement of the alleged breach.

Suitably flexible approach where breach is unintentional and minimal policy harm

41. Advice in PPG18 'Enforcing Planning Control' states that it is Government policy that enforcement action should remain within a local planning authority's discretion, but it is pointed out that the integrity of the enforcement process depends on the local planning authority's readiness to take effective enforcement action when it is essential. Public acceptance of the development control process is quickly undermined if unauthorised development, which is unacceptable on planning merits, is allowed to proceed without any apparent attempt by the local planning authority to intervene before serious harm to amenity results from it. If local authorities fail to take enforcement action where there is clear unacceptable harm to amenity or planning interests this may be held to be maladministration by the local government ombudsman. A local authority's decision not to take enforcement action may be subject to judicial review.
42. Officers are aware that government guidance states that formal enforcement action should only be undertaken where there is an unacceptable effect on the built and natural environment and public amenity, and there is a requirement to always assess the appropriateness, proportionality and expedience of taking formal enforcement action. With this in mind the table below provides members with information on closed cases over the period of 01/05/2005 to 01/01/2010.

Table 5: Case closure summaries by Community Council from 01/01/2005 to 01/01/2010

Community Council	BC	BI	M	NB	NE	Others	Total
Bermondsey	85	10	16	125	23	24	283
Borough & BS	89	12	15	136	31	35	318
Camberwell	91	15	23	191	30	32	382
Dulwich	60	15	21	211	25	33	365
Nunhead & PR	103	27	35	190	61	30	446
Peckham	38	5	13	81	21	17	175
Rotherhithe	42	2	5	81	10	16	156
Walworth	73	9	12	101	14	28	237
Total	581	95	140	1 116	215	215	2362

NB = No breach of planning control. BC = Breach has ceased. BI = Breach immune from action. NE = Breach of control but not expedient to take action. M= Miscellaneous

43. The table above shows that only 9% of the cases were closed because it was deemed not expedient to take enforcement action. Some of these closures include the unauthorised shopfront alterations in Rye Lane. This is a decision that was

taken by the previous heads of Transport & Planning and Development Control together with the then planning enforcement manager following legal advice.

44. Approximately 25% of the actionable breaches of planning control were dealt with without resorting to formal enforcement action. This is largely attributable to the negotiating skills of the planning enforcement officers involved. Officers in the team have developed good engagement and negotiating skills to achieve agreed compliance avoiding the need of often expensive and protracted formal enforcement action.
45. Members may wish to consider whether it is desirable to be briefed where cases of broad public interest are deemed not expedient to take enforcement action. Such cases could be reported to members quarterly or at any other time upon request.

Joined Up Working

46. Officers share Members' view that joined up working is imperative for an effective planning enforcement service. The move towards area based working where an officer is responsible for specific community council areas has provided a good basis for better organised and long-term joined up working and communication. Below are some of the key relationships that required to support and improve the service:

Legal Services

- The timeliness of serving notices and the effectiveness of formal action depends on good working arrangements with the Council's legal team. Planning enforcement officers and legal offices are in contact to provide and take advice on cases, prepare instructions to issue notices, and prosecutions. There are also regular liaison meetings held between planning enforcement and legal officers. Draft legal documents including enforcement notices and letters are checked by officers before dispatch. The planned system update (ACOLAID) will include action lines allowing enforcement actions and the issuance of notices to be monitored and performance targets measured.
- At a recent legal liaison meeting it was agreed that contraveners might further be encouraged to stop unauthorised development if legal services were to issue warning letters advising contraveners that formal enforcement action will be taken if an unauthorised development does not stop. It is considered that these letters may appear to carry more weight than standard warning letters issued by planning enforcement officers.

Local Businesses & Residents

- Officers and Members share the belief that local businesses and residents are key players for joined up working in the Borough. It is a fair assumption that if local residents and businesses fully understand the law most people would choose to abide by it. Therefore by providing clear guidance about planning law and process, fewer offences may be committed and possibly result in a lighter workload for the planning enforcement team.

- Officers are aware that some London boroughs have produced helpful guides for distribution to small businesses and retailers concentrating on issues such as signs and shop fronts. As reported above, planning enforcement has coordinated the production and publication of a faith premises guide and a hoardings guide in response to the proliferation of unauthorised faith premises (appendix 6) and hoardings (appendix 7) respectively.
- Similar guidance can be prepared for areas where traditionally there have been high levels of breaches such as signage, shop fronts and changes of use. This would especially benefit the high streets improvement programme which the team recently initiated focusing on Borough High Street for its pilot scheme. The benefits and impacts of such advice would be monitored and its effectiveness evaluated.
- Alternatively residents could benefit from clear information on breaches of planning control in terms of what is a breach, how breaches are reported, what happens to complaints, what is formal action, and how long action will take. The team has already prepared such information for dissemination at community councils at the request of members (appendix 5).

Other Council Units & Agencies

- Cross departmental and multi-agency working provides planning enforcement officers with the opportunity to liaise and communicate with other groups including housing enforcement, licensing, environmental protection, highways, area management teams, building control, community wardens, empty homes, the police and to coordinate the use of various statutory powers in a complementary and better ways.
- A cross department working group has been set up to coordinate the work around unauthorised faith premises and a formal working relationship established with the film and events office around the use/misuse of public space. Planning enforcement has also participated in the Partnership Operations Group, a joint task force established to provide cross borough liaison between the various local authority enforcement units.
- Recent examples of joint working in the Peckham area include: joint monitoring with the police and community wardens of breach of hours of operation by bars and night clubs and unauthorised nightclubs; and joint patrols and attendance at community events such as the recent 'You & Your Peckham' event. Community wardens have been useful for out of office hours monitoring of breaches of planning control. The presence of other agencies, especially the police, is critical in helping to collect evidence and providing discreet backup for visits to potentially risky locations.
- There is scope for other Council departments to be provided information on how to identify breaches of planning control. Officers from building control, empty homes, area management teams, licensing and environmental protection are already reporting possible breaches of planning control to the team on a regular basis. However, there might be a need to consolidate this through a more formal exchange of information and partnership workshops to get a better understanding of the remit of other teams & partner

organisations.

- Peckham Programme provided an important forum for joined up working. The area management teams, the police, and community wardens are key partners on the ground in addition to residents and Members.
- Through the planning enforcement officer assigned to Peckham, the team are available to participate in any multiple agency, joined up working in this area.

Officers are exploring the use of local publications and forums such as the Peckham Residents Network and other forums to disseminate information on enforcement work and would welcome any suggestions from residents and members.

Scheme of Delegation

47. Officers are of the view that the current scheme of delegation as set out in the Constitution allows for effective enforcement and that there is no recommendation for it to be changed at this time.
48. Members may wish to consider the need for detailed member briefings prior to the closing cases of broad public interest and contraventions of planning caused by other Council departments. Is the report to community council's providing the desired information (see copy of such a report in appendix 8)

Desired Outcomes from the Scrutiny Process

- Review of the efficiency, responsiveness and effectiveness of the planning enforcement team;
- Establishment of a performance monitoring system for planning enforcement;
- Better use of relevant enforcement tools;
- Closer working relations with members and effective member involvement in the planning enforcement process;
- Improved joined up working with other Council units;
- Greater cooperation of other Council departments in resolving breaches of planning control caused by the Council;
- Take direct action where Council units fail to remedy breaches; and
- Publish focused guidance in planning regulations to specific target groups such as small businesses.

This will build on the measures that are underway to:

- Recruit a full complement of permanent enforcement officers within the team;
- Take quick and effective action against unauthorised development that is unlikely to be granted planning permission through increased use of temporary stop notices. This will save the Council time and resources and will stop contraveners from incurring expenses on development that would not be granted permission;
- Use injunctions to stop unauthorised development continuing in defiance of enforcement notices;
- Consolidate progress achieved in the pro-active projects to date through (i) the removal of hoardings from sites where appeals against discontinuance notices have been dismissed and other sites posing serious harm public safety and to

- amenity (ii) taking formal enforcement action against all unauthorised places of worship that remain within preferred industrial locations and other unsuitable sites and; remove unauthorised satellite dishes harming the setting of listed buildings and the appearance and character of listed buildings;
- Increase the use of section 215 powers to clear up sites whose appearance adversely affect the amenity of neighbourhoods within the borough;
 - Increase prosecution cases against people who fail to comply with the requirements of enforcement notices;
 - Increase the use of direct default action where contraveners fail to comply with enforcement notices to remove unauthorised development;
 - Pro-actively monitor archaeological conditions to reduce the potential loss of remains being lost through breaches of archaeological conditions;
 - Pro-actively monitor the major thoroughfares of Southwark to identify breaches of planning control and initiate mitigation measures;
 - Regularly update complainants on progress with investigations and clearly explain the Council's actions to both complainants and contraveners;
 - Prepare quarterly planning enforcement performance reports to Community Councils and avail an Area Officer to present the reports at CC meetings;
 - Continue to work closely with other departments to increase the effectiveness of planning enforcement action and if possible establish joined up initiatives.

Conclusion

49. There have been significant improvements in the performance of the planning enforcement team especially over the past two years and lessons can be drawn from the past.
50. There is need to consolidate good practices and to develop processes and procedures to monitor and evaluate the performance and raise the profile of this key Council function.

APPENDICES

No.	Title
Appendix 1	Performance Figures
Appendix 2	Planning Magazine Publications
Appendix 3	Enforcement Investigation Form
Appendix 4	Planning Enforcement Processes & Procedures
Appendix 5	How to report breaches of planning control
Appendix 6	Faith Premises Guide
Appendix 7	Hoardings Guide
Appendix 8	Example of report to Community Council

AUDIT TRAIL

This section must be included in all reports.

Lead Officer	Gary Rice
Report Author	Dennis Sangweme

Version	Final	
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Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / EXECUTIVE MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Communities, Law & Governance	Yes	No
Finance Director	No	No
List other officers here		
Executive Member	No	No
Date final report sent to Constitutional/Community Council/Scrutiny Team	22 February 2010	