

BABERGH DISTRICT COUNCIL and MIDSUFFOLK DISTRICT COUNCIL

From: Planning Enforcement	Report Number: JSC/12/14
To: Joint Scrutiny Committee	Date of meeting: 23 July 2014

REVIEW OF PLANNING ENFORCEMENT IN BABERGH AND MID SUFFOLK

1. Purpose of Report

- 1.1 To examine the understanding and impact of planning enforcement within the two Districts and the role of Members in planning enforcement.

Excluded:

A service review of the current Operational Development Team as this will be carried out as part of the Planning Transformation Project.

2. Recommendations

- 2.1 That the contents of the report be noted.
- 2.2 That, subject to any amendments which the Committee may wish to make as a result of its consideration at today's meeting, the 'Conclusions' of the report a contained in Paragraph 21 be taken forward for consideration as part of the impending Planning Services Transformation Project.

The Committee is able to resolve this matter.

3. Financial Implications

- 3.1 There are no financial implications arising directly from the content of this report.

4. Risk Management

- 4.1 There are no significant risks arising directly from the content of this report.

5. Consultations

- 5.1 In view of the nature of this report consultation has not been undertaken.

6. Equality Analysis

- 6.1 There are no equality and diversity implications arising directly from the content of this report.

7. Shared Service / Partnership Implications

- 7.1 There are no shared service/partnership implications arising directly from the content of this report, with the exception of the following:

The Babergh and Mid Suffolk planning services are transforming and a “One Service Model” has been adopted by Members. Integration is taking place with a shared Operational Delivery team (in place from 1 July 2013 onwards), with some staff working flexibly to address workload needs across both Councils. However, the sovereignty of both Councils and the Local Planning Authority status remain separate.

7.2 Consideration of further options for partnership working will occur as part of the impending Planning Transformation Project covering the entire planning service.

8. Key Information

8.1 The Committee resolved to undertake a review of the Planning Enforcement service, which would consider the matters identified in Report JSC/09/14, namely:

- Legislation and powers
- Legal input
- Planning Enforcement Policies for Babergh and Mid Suffolk
- Performance information
- Future legislative changes which may impact on planning enforcement
- Formal service complaints
- Appeals
- Need to be more proactive?
- Member training
- Publication of successful prosecutions

9. Background to Planning Enforcement

9.1 The planning enforcement system is embedded within the Town and Country Planning Act 1990 and the Planning (Listed Buildings and Conservation Areas) Act 1990. These give discretion to the Local Planning Authority in the exercise of its powers for the control of unauthorised development.

9.2 Other than in very specific situations (e.g. works to listed buildings) it is not a criminal offence to carry out work without planning permission, or not in accordance with approved plans. It is therefore important that unauthorised developments are treated on their individual merits in the same way as proposed developments. The underlying principle is that the Local Planning Authority may issue an enforcement notice where it appears that there has been a breach of planning control and that it is expedient to issue the notice, having regard to the provisions of the Development Plan and to any other material considerations. In other words, enforcement is discretionary and decisions follow the same principles used to determine whether planning permission should be granted. The test to be applied is “would planning permission have been granted for this development had it been the subject of a planning application?”

9.3 The Government’s National Planning Policy Framework (NPPF) states “Effective enforcement is important as a means of maintaining public confidence in the planning system. Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of planning control”. Enforcement powers may be invoked where development has been carried out without the requisite grant of planning permission, or a condition imposed on a planning permission has been breached. The Act also provides for special controls such as planning obligations, tree preservation orders and listed buildings.

- 9.4 In discharging its functions, the Planning Enforcement team is also bound by the Councils' joint 'Corporate Enforcement Statement of Policy' and each Council's respective Planning Enforcement policies, all of which have been formally adopted and have been drafted having regard to national policies and guidance.
- 9.5 The Councils' planning enforcement policies sets out the Councils' respective systems of prioritising complaints for initial investigation. The prioritisation systems are broadly similar in that they rank cases depending on their gravity, the harm being caused and the material planning considerations involved. Thus for example: damage to protected trees or unauthorised works to a listed building are given high priority; unauthorised developments in an AONB or Conservation Area are given a medium priority; whilst unauthorised developments, which would be likely to receive planning permission are given low priority. Priority is not driven or decided by who complains, or how persistently they complain.
- 9.6 It should be noted that the prioritisation systems are primarily intended to ensure that serious cases are investigated quickly to establish the level of harm being caused. Unless serious harm is being caused, it does not necessarily follow that formal enforcement action, if appropriate, will or can be expedited – the Council will usually seek to negotiate a resolution in accordance with its policies and any enforcement action will be proportionate to the breach and will generally be held in abeyance whilst valid planning applications or appeals are determined.

10. Origin of complaints and public expectations

- 10.1 Complaints come from a variety of sources but the majority come from members of the public. Whilst officers make no judgement as to why a complaint might be made (we try to avoid becoming involved in neighbour disputes) complaints are treated in confidence. Officers do not, as a rule, investigate anonymous complaints and if a resident/stakeholder has a concern about contacting the Councils, their concerns can be raised via a ward member.
- 10.2 Other complaints may come via elected local representatives (Members or MPs).
- 10.3 A complaint is not always necessary to trigger an investigation. Planning Enforcement and Development Management officers have a "policing role" as part of their duties and breaches of control they identify will be investigated where appropriate. In other circumstances alleged breaches of control may be reported by other Council departments or external organisations such as the Police, Fire Brigade or Environment Agency.
- 10.4 In many cases breaches of control may occur because landowners are unaware of the requirements of the planning regulations, in other cases breaches may be quite deliberate, although these are in the minority. The circumstances in which a breach has occurred are not generally a material planning consideration and officers avoid value judgments on land owners or those making complaints of alleged unauthorised development.

From discussions with Members during the scoping stage for this report and at the recent Member training sessions (attended by 52% of all Members), it has become apparent that there is a discrepancy between public expectations, as reported to Members, and what action the Council is actually able to take. Many Members who attended the training sessions reported frustrations expressed by their constituents and parish/town councils that planning enforcement action was not being taken by the Council, or about the length of time taken to resolve certain cases. However, following the recent Member training sessions and discussions between officers and parish councils, it is evident that there is perhaps a lack of understanding in the community about the legal framework around planning enforcement, and in particular:

- The legalities of carrying out development without first seeking planning permission and the fact that in most cases this is not an offence.
- Permitted development rights, which have recently been significantly extended. Government has also signalled its intention to further extend these rights.
- The fact that the Council will not rectify all breaches of planning control. Action will only be taken where there is an unacceptable effect on the built or natural environment and public amenity, based on sound planning reasons. The Council is required by policies and legislation set by Central Government to decide the appropriateness of formal action. The test is whether the unauthorised activities are causing harm having regard to the Development Plan policies and other material considerations. This is often referred to as an *expediency* test. In cases where a technical or trivial breach has taken place, but it is causing only minimal harm to amenity, it is not worthwhile to take lengthy and expensive enforcement action.
- Enforcement action must be in the public interest and should not be used solely to “regularise” development which is acceptable on its planning merits. The aim of planning enforcement is to remedy planning harm, it is not about punishment.
- Central Government guidance and our own enforcement policies stipulate that enforcement action should only be used as a last resort.
- It is not possible to investigate every complaint with equal priority and intensity. Our resource is directed to breaches that cause the greater harm to the environment or to public amenity.
- An enforcement investigation can be a lengthy and complex process. The time taken to determine each case will vary depending on the site, the people involved, the type of breach and the legal issues involved.

11. What enforcement powers does the Council have?

11.1 Effective enforcement is essential to a credible planning service. Where serious harm is being caused, or where negotiations have failed or stalled, the Council will use the powers available to it. The main powers used are:

- Breach of Condition Notices (which deal with breaches of planning conditions);
- Planning Contravention Notices (which are used to establish whether a breach is actually occurring);

- Injunctions (which can be used to arrest or restrain the most serious breaches of control);
- Untidy land/building notices;
- Enforcement of duties as to replacement of trees; and
- High Hedges Remedial Notices.

11.2 In addition, officers in the Planning Enforcement team will work with other colleagues in the Councils such as Environmental Protection, Housing and the Legal teams, to ensure our response to complaints is as effective and comprehensive as it can be and uses resources most efficiently.

12. When does the Council use its powers?

12.1 As a general rule the use of any enforcement powers should be last resort and planning enforcement is no different. A staged approach to formal enforcement action will always be adopted – as stipulated in the Councils’ adopted enforcement policies.

12.2 Officers will carry out an investigation to ascertain whether a breach of control has occurred and, if it has, the first option will be to consider whether the breach is so minor as not to warrant further action. The next option may be to invite an application to regularise the breach. This is particularly appropriate if an officer has offered an informal opinion that an application can be recommended favourably or a development amended to make it acceptable. Officers have found that land owners who receive positive, clear and constructive advice are more likely to respond with an application. If officers take the view the breach cannot be addressed by a planning application they will seek to negotiate or to persuade the owner or occupier of a site to voluntarily remedy the harmful effects of unauthorised development. If the breach continues then consideration will be given to taking formal enforcement action, but the Councils’ policies make it clear that the key test is whether it is *expedient* to take action, taking into account all material planning considerations.

13. Why do officers sometimes invite a retrospective planning application?

13.1 It is reasonable to do so as a first option and because carrying out development without the necessary planning permission is not a criminal offence in all cases. Although some breaches of control can be serious, summary offences are not committed except in a handful of instances e.g. damage to listed buildings, felling of protected trees, display of advertisements.

13.2 The opportunity to make a retrospective application is available to anyone, under planning law. It is considered by the majority of councils to be the first, most reasonable and fairest option available to the contravener where it is considered planning issues do not arise in respect of the breach or where matters can be dealt with by planning conditions etc. In addition, an application is an opportunity for complainants, neighbours or other stakeholders to make known their views on a development before a decision to regularise the development is taken. Whilst the consequences of refusing planning permission retrospectively must be considered, the fact that a development is partially or fully completed is not generally a material consideration in arriving at a recommendation on an application.

13.3 The Councils will never enforce simply to obtain a planning fee, but it is often after officers explain the consequences of not securing planning permission (difficulty in selling property etc.) that land owners see the advantage of making an application and securing the necessary planning permission. Applications which are submitted retrospectively are dealt with no differently to other applications, the same material planning considerations will apply.

14. Are there circumstances where a retrospective application would not be invited?

14.1 If officers consider the breach to be one that would not be remedied by a planning application or where officer advice is that permission is unlikely to be granted for the development, a decision may be taken to move immediately to enforcement action. It is always open to a land owner to make such an application, but this will be on the basis that they understand they may be incurring significant financial costs with no reasonable prospect of securing planning permission. Many land owners choose to make an application even in those circumstances in order to test any refusal of permission at appeal. Where this does occur, in the interest of the most efficient use of resources, officers may exercise discretion not to proceed with further enforcement action until the appeal has been decided.

14.2 Where an appeal is allowed the matter is generally closed, where it is dismissed a contravener may be more willing to remedy the breach without the need for formal enforcement action by the Councils.

15. Is there a right of appeal against enforcement action?

15.1 Generally yes, but there are some exceptions. Where a council serves full planning enforcement or similar notice, rights of appeal exist under the legislation and the requirements of the notice are suspended pending the outcome of any appeal. Appeals are conducted through the three main procedures of written representations, hearings and local inquiries. Where a council has served a Planning Contravention Notice (PCN) to seek information to establish whether a breach is taking place, the recipient must complete and return the PCN or an offence will be committed. Similarly, if a council serves a Breach of Condition Notice (BCN) any appeal is to the local Magistrates' Court.

16. What can the consequences be for a land owner that fails to remedy breach?

16.1 Generally speaking, and once all appeals procedures have been exhausted (this will include the courts on judicial review) a land owner may be liable to prosecution for failure to comply with a notice. Prosecution can lead to a fine (on a sliding scale) and cases are heard in the Magistrates' Court or higher courts if a larger fine or sanction is required to be imposed. The highest recorded fine was £1.4m for a land owner who converted a house to 12 flats without planning permission and subsequently failed to comply with an enforcement notice: he was fined £40k for the planning breach with £35k legal costs, the remainder of the fine was secured under the Proceeds of Crime Act (POCA) and related to rental income from the property. The POCA has been used in a number of cases where financial gain has been made from breaches of planning control.

17. Works in default

- 17.1 Where the Councils have successfully served a notice, but the requirements of the notice have not been complied with, the Councils may enter onto the land and carry out “works in default”. They may then recover their costs by placing a charge on the land or other legal action. Whilst this sounds an attractive option, it is now rarely considered because of resource constraints and the issue of costs recovery.

18. Staff resources

- 18.1 The management of the Planning Enforcement team was restructured following the departure of the previous Corporate Manager in November 2013. James Buckingham is now the Corporate Manager for the Planning Enforcement team, in addition to acting in the same capacity for the Environmental Protection team. However, the Planning Enforcement team remains a separate team within the Economy division and reports to the Head of Economy.

The vacancy left by the departure of the previous Corporate Manager was replaced by a new operational Senior Planning Enforcement Officer post at Grade 6. Day-to-day supervision of work is undertaken by the senior Officer who monitors workload and advises on proposed actions along with input from the Corporate Manager and Corporate Managers for Development Management as and when required. Including the Senior Officer, there are 5.6 full time equivalent operational Planning Enforcement Officers in the team. The team is supported by one full time equivalent Administrative & Technical Support Officer.

19. Enforcement activity update and ‘publicity’

- 19.1 Table 1 below gives a summary of the numbers of complaints investigated and the principal types of enforcement activity in the two authorities since 2008/09.

Table 1: Complaints investigated and enforcement actions

	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14
Complaints investigated						
Babergh District Council	486	394	368	365	264	301
Mid Suffolk District Council	446	301	234	213	156	154
Enforcement Notices served						
Babergh District Council	37	11	11	8	7	5
Mid Suffolk District Council	23	14	6	7	4	1
Planning Contravention Notices served						
Babergh District Council	51	12	38	24	16	14
Mid Suffolk District Council	17	32	16	17	7	7
Breach of Condition Notices served						
Babergh District Council	0	0	0	0	1	0
Mid Suffolk District Council	1	1	0	0	0	0

	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14
Number of prosecutions						
Babergh District Council	6	0	0	0	1	1
Mid Suffolk District Council	0	0	0	0	0	1
Number of injunctions						
Babergh District Council	1	0	0	0	0	0
Mid Suffolk District Council	0	0	0	0	0	0
Number of Stop Notices served						
Babergh District Council	1	0	0	1	0	0
Mid Suffolk District Council	8	15	5	2	0	1
Section 215 Notices (untidy sites) served						
Babergh District Council	0	0	0	0	0	0
Mid Suffolk District Council	0	0	1	0	0	0

Source: Departmental records

- 19.2 For the last five months of 2013/14 there were two vacancies in the small integrated team of 5.6 FTE operational officers. Despite this significant staffing shortage, the team managed to hold the numbers of 'active' cases at a relatively stable level. There was a slight increase in the number of active cases in Mid Suffolk in the fourth quarter as a consequence of the vacancies, but this has now been stabilised – the number of active cases in both districts is being maintained at around the 180-200 mark. This is unlikely to change with current resources or without major changes to what or how we investigate the bulk of complaints, which are in the medium-low category.
- 19.3 There is a general downward trend in the number of cases investigated. This can partly be attributed to the way in which cases are handled now, with the integrated team recording cases in the electronic system only where a visit is needed or work invested to resolve it. As such, not every matter raised is recorded as an active 'case', with preference given to responding as quickly as possible where there is no breach of control or where no action can be taken rather than investing time and resource into logging this as a 'case' and making up a file. This process is working well and appears to be well received by the customer who receives a quicker response.
- 19.4 It should be noted that the downward trend in the number of cases has occurred in parallel to a downward trend in the number of formal enforcement actions. This would suggest that the Councils' enforcement policies of endeavouring to resolve breaches of planning control through negotiation wherever possible, in preference to the service of formal notices or prosecutions is effective.

19.5 It has not been possible to collate meaningful statistics of the types of complaint due to historical differences in the way the 'Acolaid' computer software has been used at each authority. However, anecdotal evidence from operational officers indicates that for a large number of complaints it was not expedient to pursue action as the alleged development was immune from enforcement under the provisions of the Acts or was actually permitted development under the Permitted Development Regulations – and in many of these cases the background to these complaints has been a neighbour dispute.

19.6 The team also secured two successful prosecutions during 2013/14:

- A national retailer in Sudbury was found guilty of displaying unauthorised signage on its premises in the Sudbury Conversation Area and was fined £2,000 and ordered to pay £1,115 in costs to Babergh District Council and the Court. The company had attached an illuminated advertisement display to the fascia of the canopy on the front and side elevations and had refused to replace it despite efforts to negotiate a resolution.
- A resident of Hoxne was fined £400 and ordered to pay more than £1,000 in costs to the Mid Suffolk District Council and the Court for installing solar panels on the roof of his property, which has listed building status, without applying for planning permission or listed building consent. Retrospective permissions were applied for, but these were refused due to the impact the panels were having on the setting of the listed building.

Both of these cases were well publicised in the local media and on the Councils' websites to serve as a deterrent to others.

19.7 Decisions to serve enforcement notices are subject to appeal. At the previous Committee meeting, Members specifically requested details of appeals against enforcement notices. A detailed break down of the types of appeal and decisions made by the Planning Inspectorate is presented for each authority in the appendix.

20. Service complaints

20.1 The Councils operate a formal complaints procedure for those individuals who are aggrieved with the level of service they have received. A new joint policy and two-stage procedure was implemented in April 2013.

20.2 Stage 1 complaints

A total of 12 'Stage 1' complaints were received during 2013/13 (6 BDC; 6 MSDC):

<i>Table 2</i>	<i>Not Upheld</i>	<i>Upheld in part</i>	<i>Upheld in full</i>
Complaints received			
Babergh District Council	4	1	1
Mid Suffolk District Council	4	1	1

20.2 Stage 2 complaints

A total of three 'Stage 2' complaints were received during 2013/13 (1 BDC; 2 MSDC):

Table 3	Not Upheld	Upheld in part	Upheld in full
Complaints received			
Babergh District Council	1	-	-
Mid Suffolk District Council	1	1	-

20.3 Ombudsman complaints

Complainants who remain dissatisfied after going through this procedure may go on to pursue their complaint with the Local Government Ombudsman.

Table 4	Babergh District Council	Mid Suffolk District Council
Complaints to Ombudsman	2	2
Ombudsman declined to investigate	1	1
Maladministration found	0	0
Maladministration not found	1	1

20.4 The figures for 2012/13 are not capable of being used for comparison purposes as they were incomplete due to the launch of the Councils' new complaints procedure. However, the small number of service complaints in 2013/14 does not appear to indicate that significant problems exist in the service.

20.5 Where appropriate, new practices and ways of working have been implemented so as to address lessons learnt through the complaints process.

21. Conclusions

21.1 It is evident that managing expectations in respect of planning enforcement matters is extremely important and there appears to be a discrepancy between public expectations and what action the Council is able to take.

21.2 Greater clarity about the enforcement process could be achieved by:

- Producing a joint enforcement policy for the Councils, to reflect the integration of the officer teams and Members' adoption of a "One Service Model" for the entire planning service. A first draft is already being produced and seeks to identify clear priorities and new service standards to inform all involved in the enforcement process.
- Providing an explanation guide/leaflet to people who contact the Councils with an enforcement complaint. The documentation should also include the type of information the complainant may have to collect to enable the Council to pursue its case.

- In conjunction with the Development Management team, reviewing the published advice given by the Councils on common permitted development issues.

This information should also be published on the Councils' websites.

- 21.3 The Planning Enforcement team will continue to maintain a proactive stance in communicating enforcement issues and publishing media releases to highlight prosecutions and other cases where planning enforcement action is taken.
- 21.4 As part of the Member training programme, the Councils should seek to ensure that all Councillors receive training on the planning enforcement procedures to ensure that they are equipped with information to assist the Councils with planning enforcement.
- 21.5 As part of the Councils' ongoing programme of community engagement and the Planning Transformation Project, it is intended that a programme of briefings or seminars will be devised to better inform Parish/Town Councils about the planning enforcement framework and the District Councils' policies and procedures.
- 21.6 The current level of active case investigations is unlikely to change with current resources, or without major changes to what or how we investigate the bulk of complaints, which are in the medium-low category. Member and community consultation will form an essential part of the impending Planning Transformation Project to determine how best to prioritise resources in the future.
- 21.7 The Planning Transformation could include a possible 'triage system' for all requests to investigate breaches of planning control. A 'desk top' exercise could be undertaken to establish cases where the issues raised are not a planning matter or where the breach is minor or technical. These cases would not be investigated and the customer could be advised of this within a specified period. A 'risk assessment/rating' proforma could be developed to define the type/nature of alleged breaches that the Councils would investigate.
- 21.8 Following the recent management and staffing changes in the Planning Enforcement team, a system of reviews for 'stalled' cases has commenced and will be developed further and established as part of the team's working procedures. Consideration is being given to whether and how such cases should be prioritised above incoming cases.

22. Appendices

Title	Location
Appendix 1 – Enforcement appeals, 2008/09 to 2013/14	Attached
Appendix 2 - Listed Building/Conservation Area Enforcement appeals, 2008/09 to 2013/14	Attached
Appendix 3 – Lawful Development Certificate appeals, 2008/09 to 2013/14	Attached

23. Background Documents

23.1 None.

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Appendix 1

Enforcement Appeals

	<i>Planning Permission Granted</i>	<i>Quashed on legal grounds</i>	<i>Split decision</i>	<i>% allowed</i>	<i>Notice upheld</i>	<i>Notice varied and upheld</i>	<i>Invalid</i>	<i>% dismissed</i>	<i>Total</i>
2008/09									
Babergh District Council	1	1	0	33%	3	1	-	67%	6
Mid Suffolk District Council	2	0	0	40%	3	0	-	60%	5
2009/10									
Babergh District Council	1	1	0	15%	8	3	-	85%	13
Mid Suffolk District Council	0	2	0	20%	4	4	-	80%	10
2010/11									
Babergh District Council	0	0	0	0%	1	0	-	100%	1
Mid Suffolk District Council	1	1	1	43%	4	0	-	57%	7
2011/12									
Babergh District Council	0	0	0	-	0	0	-	0	0
Mid Suffolk District Council	0	0	0	-	1	2	-	0	3
2012/13									
Babergh District Council	2	0	0	40%	0	3	0	60%	5
Mid Suffolk District Council	1	0	0	33%	0	2	0	67%	3
2013/14									
Babergh District Council	0	0	0	-	0	0	0	-	0
Mid Suffolk District Council	0	0	0	-	0	0	0	-	0

Appendix 2

Listed Building/Conservation Area Enforcement Appeals

	<i>Planning Permission Granted</i>	<i>Quashed on legal grounds</i>	<i>Split decision</i>	<i>% allowed</i>	<i>Notice upheld</i>	<i>Notice varied and upheld</i>	<i>Invalid</i>	<i>% dismissed</i>	<i>Total</i>
2008/09									
Babergh District Council	-	-	-	-	-	-	-	-	-
Mid Suffolk District Council	-	-	-	-	-	-	-	-	-
2009/10									
Babergh District Council	0	0	0	0%	1	0	-	100%	1
Mid Suffolk District Council	0	0	0	0%	4	0	-	100%	4
2010/11									
Babergh District Council	0	0	1	100%	0	0	-	0%	1
Mid Suffolk District Council	0	0	0	-	0	0	-	-	0
2011/12									
Babergh District Council	0	0	0	-	0	0	-	-	0
Mid Suffolk District Council	0	0	0	-	0	0	-	-	0
2012/13									
Babergh District Council	0	0	0	-	0	0	0	-	0
Mid Suffolk District Council	0	0	0	-	0	0	0	-	0
2013/14									
Babergh District Council	0	0	0	-	0	0	0	-	0
Mid Suffolk District Council	0	0	0	-	0	0	0	-	0

Appendix 3

Lawful Development Certificate Appeals

	<i>Allowed</i>	<i>Split decision</i>	<i>% allowed</i>	<i>Dismissed</i>	<i>% dismissed</i>	<i>Total</i>
2008/09						
Babergh District Council	-	-	-	-	-	-
Mid Suffolk District Council	-	-	-	-	-	-
2009/10						
Babergh District Council	0	0	-	0	-	0
Mid Suffolk District Council	0	0	-	0	-	0
2010/11						
Babergh District Council	0	0	0%	1	100%	1
Mid Suffolk District Council	1	0	100%	0	0%	1
2011/12						
Babergh District Council	0	0	-	0	-	0
Mid Suffolk District Council	1	0	33%	2	67%	3
2012/13						
Babergh District Council	0	0	0%	1	100%	1
Mid Suffolk District Council	0	0	-	0	-	0
2013/14						
Babergh District Council	0	0	-	0	-	0
Mid Suffolk District Council	0	0	-	0	-	0

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