Audit and Corporate Services Review Committee

REPORT OF THE PERFORMANCE AND COMPLIANCE CO-ORDINATOR

SUBJECT: PERFORMANCE REPORT FOR THE PERIOD ENDING 31st MAY 2017

Introduction

The performance report follows the structure of the Corporate and Resources Plan for 2017/18. This follows the approach of the Well-being of Future Generations Act with seven well-being objectives, with an additional section providing general governance information. A number of new measures have been introduced to reflect actions within the Corporate and Resources Plan 2017/18.

The following report presents the performance to date up to 31st May 2017. Due to the reporting period, statistical data is only available for data inputted into Ffynnon on a weekly and monthly basis and for some annual data sets. Quarter 1 statistics for data sets recorded quarterly on the system will be reported at the next Audit and Corporate Services Committee.

The LDP preparation is 2 months behind the dates specified in the original Delivery Agreement. However the intention is to regain those 2 months 'lost' so we are back on track in the run up to placing the Plan on Deposit.

Work has commenced on the majority of actions. Please note under the action on Welsh Government Mentoring scheme, that due to Welsh Government appointing a third new Member to commence in February 2018 the Authority will not be continuing at present with the mentoring scheme. This is to be reviewed in March 2019 in preparation for new Welsh Government appointments in 2020.

Additional information has been included at the end of the report clarifying planning enforcement statistics for 2016/17 following a Member's query during Audit and Corporate Service Committee on 10th May. Officers have reviewed enforcement data and how information is presented. Data from Ffynnon will now be collated and presented in line with the statutory indicators for enforcement cases investigated and enforcement action.

RECOMMENDATION:

Members are requested to RECEIVE and COMMENT on the Performance Report.

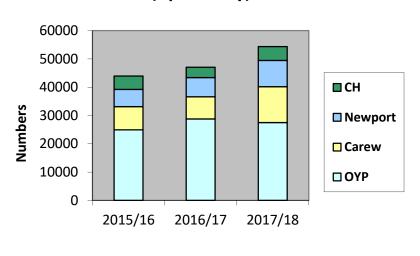
(For further information contact Mair Thomas, Performance and Compliance Coordinator, on extension 4810)

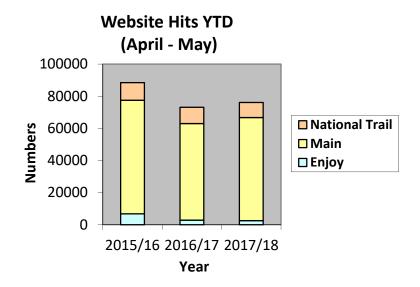
Objective 1 – Prosperity

Data Available Monthly							
Measure	May 2016	2017/18 previous period - April 2017	2017/18 Current Period – May 2017				
	Actual	Actual	Actual	Target	RAG	Trend	Comments
LDP prep deviation from the dates specified in original Delivery Agreement in Months	New Indicator	2	2	0	Red	→	Intervention is set at 2. The intention is to regain those 2 months 'lost' so we are back on track in the run up to placing the Plan on Deposit.
# Social Media Followers	23182	30885	31841	26000	Green	→	
# Enjoy website hits ytd	2838	1258	2509	4332	Red	→	
# Main Website hits ytd	60131	32901	64227	60000	Green	Ψ	
# Pembrokeshire National Trail website hits ytd	10120	4719	9348	8666	Green	→	
# Visitors at Centres ytd	47041	28705	54335				Increase of 15.5% on last year, positive impact of Easter holidays on April figures.
Castell Henllys Trip Advisor Overall Rating 1-5	New Indicator	4.5	4.5	4.5	Green	→	
Castell Henllys Trip Advisor Overall Rating 1-5	New Indicator	4.5	4.5	4.5	Green	→	
OYP Trip Advisor Rating 1-5	New Indicator	4.5	4.5	4.5	Green	→	
Pembrokeshire Coast Path – Trip Advisor Overall Rating 1-5	New Indicator	5	5	5	Green	→	
% Authority Spend locally	New Indicator	49.86%	52.08%				£120967 spent in SA postcode ytd.
% Invoices paid on time	98.56	97.93	97.89	97	Green	¥	

[↑] Improving Trend → Static Trend ◆ Worsening Trend

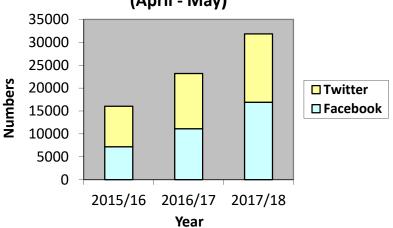
Centres - Visitor Numbers YTD (April - May)





Year

Social Media Accounts YTD (April - May) 35000



Data Available Quarterly – First set of data for 2017/18 for the following will be available end of July 2017						
% of all applications determined within time periods required ytd	# Parkwise and other training sessions delivered to tourist providers					
	ytd					
Average time taken to determine all applicants in days ytd	# Dark Sky events held by the Authority ytd					
# planning applications registered	# participants at Dark Sky events held by the Authority ytd					
% of planning applications approved	# film enquiries ytd					
% of applications determined under delegated power	% of PROW open and Accessible and Meeting the quality standard					
% of Member made decisions against officer advice	# complaints on PROW standards ytd					
(recommendation)						
% of appeals dismissed	# of businesses participating in local fairs and events at OYP, Carew					
	and Castell Henllys ytd					
Applications for costs at section 78 appeal upheld in the reporting	# of Artists and Craft makers supported through Centres ytd					
period						

Data Available Annually						
Measure		2016/17				
	Actual	Target	Comment			
# businesses benefitting from summer trading concession provision	7		Baseline data.			
% trainees in employment/ further education following completion of skills in action programme	100%		Ten are in employment, nine of which are in the country side sector, one is studying at university. One of our current trainees has just gained fulltime employment with the Authority as a South Warden. Leaving three current trainees who are still with the Authority until the end of August. A film has been developed about the programme. An independent review of the traineeship project is being carried out across PCNPA and BBNPA on the 21 st of June. A company called ARAD will be leading on this talking to trainees and the staff who work on the project.			
# tourism businesses engaged through Naturally connected Project	7		Baseline data.			

Action						
Measure	Previous Period April 2017	Current Period May 2017				
	RAG	RAG	Trend	Comments		
PCNPA support for Iron Man Wales	Green	Green	→	The Authority has agreed funding for Iron Man Wales for 2017/18 and to continue supporting it. Action complete.		
Work with Tourism Partners	Green	Green	→	Attended Social Tourism Roundtable chaired by Swansea University to look at developing projects in Wales. Launch of the Discovery in the Dark Project with local and NPA Wales partners. Chaired the Engaging Event Organisers multi agency meeting. Working with Pembs Biodiversity Partnership to consider viability of Visitor Giving options.		
Work with Partners – Recreational Plan Action Plan	Green	Green	→	2017/18 Recreation Action Plan circulated to working group. Meeting to consider engagement with Events organisers set up. Opportunities to update the 2011 Recreation Action Plan being explored internally		
Development of New Rights of Way Improvement Plan	Green	Green	→	Working with Pembrokeshire County Council in accord with agreed timetable to prepare new ROWIP for publication in 2018.		
Advocacy activity – 3 rd purpose of the National Park to be recognised in legislation	Green	Green	→	Future Landscapes Wales report published 10 th May. Discussions ongoing with Welsh Government.		

Objective 2 - Resilience

Data Available Quarterly – First set of data for 2017/18 for the following will be available end of July 2017					
% in line with Management Plan	# Community Groups Involved with INNS ytd				
# Voluntary Wardens	HA- INNS removed at source/ injected (ha) ytd				
# Volunteer Days – Conservation ytd	# of applications for works to protected trees determined ytd				
% attendance at Volunteer Wardens Study days ytd	# of new tree preservation orders made ytd				
# Volunteer Days INNS ytd					

Data Available Annually						
Measure	2014/15	2015/16 data				
	Actual	Actual	Target	Comment		
# of approved developments contrary to landscape protection policies (LDP policy 8) – LDP monitoring report	0	1		2 developments permitted contrary to any criterion in any one year. 2016/17 results will be reported as part of Annual LDP monitoring report.		

Action						
Measure	Previous Period April 2017	Current Period May 2017				
	RAG	RAG	Trend	Comments		
Development of volunteer ambassadors through Pathways Project	Green	Green	→	The Pathways Project is due to start in in the summer of this year. One of the key objectives will be to develop the roles of volunteers as National Park Ambassadors. Training and experiential learning will be part of the package offered to volunteers wishing to become Ambassadors.		
Involvement with Partnership Networks that contribute to the	Green	Green	→	The NPA is a member of the Pembrokeshire Nature Partnership (PNP - formerly the Pembrokeshire Biodiversity Partnership). The		

management of the National Park's Ecosystems			PNP provides a strategic overview and forum for collaboration in implementing EU, UK, Welsh and local priorities for biodiversity action. NPA Report 09/17 of 29th March 2017 provides more background on PCNPA's membership of the PNP. Current membership is: Amphibian and Reptile Conservation; Buglife; Darwin Centre; Farmer's Union of Wales; Keep Wales Tidy; National Trust; Natural Resources Wales; Pembrokeshire Coast National Park Authority; Pembrokeshire County Council; PLANED; Welsh Government (funded by, not a terms of reference signatory); West Wales Biodiversity Information Centre; Wildlife Trust of South and West Wales.
Submission of Funding Bids/ funding Bid Outcomes (Conservation and enhancement work)	Green	Green	A bid to Welsh Government for finance to continue and extend the Stitch in Time project (combating invasive species focused on the Gwaun catchment) resulted in £100k being awarded.

Objective 3 – Health and Well-being

Data Available Monthly							
Measure	May 2016	2017/18 Previous Period - April 2017		2017/18 Current Period – May 2017			
	Actual	Actual	Actual	Target	RAG	Trend	Comments
# of web walks downloaded	New Indicator	3643	7653				In May the three walks with the highest downloads were: Stackpole head (half day) – 105 Tenby (half-day) – 78 Manorbier (short walk) – 74

Data Available Quarterly – First set of data for 2017/18 for the following will be available end of July 2017					
# Participants in outdoor learning sessions ytd	# family JMA awarded				
# Outdoor training sessions for teacher ytd	# School children engaged in physically active sessions				
# Teacher trained in outdoor learning ytd	# School children participating in walks led by PCNPA				
# Participants Walkability Scheme ytd	% Schools in National Park engaged with physically active sessions				
	ytd				
# group leaders trained through Walk leader training session ytd	% Schools in Pembrokeshire engaged with physically active sessions				
	ytd				
# of people using footpath (from fixed counters) ytd	# Community Project Events ytd				
# participants in walks led by rangers, centre staff and volunteers ytd	# Volunteer days ytd				

Action						
Measure	Previous	Current Period May 2017				
	Period					
	April 2017					
	RAG	RAG	Trend	Comments		
Work with West Wales Natural Heath	Green	Green	→	Work with NPW Wales supporting this initiative during joint NPA		

Network				meetings. Opportunities for research / information sharing explored with network co-ordinators and Swansea University. Attended NHS Big Proactive Care event in Llanelli. WWNHS first Communities of Practice meeting held.
Let's Walk Pembrokeshire Initiative	Green	Green	→	Meeting held with key partners to identify and coordinate Let's Walk Events for Walking month of May. Promoted Walking month of May. Walks and events offered by schools and partner organisations. Social media used to promote walking - good feedback on the level of engagement and awareness raising of walking opportunities locally.
Development of mechanisms to encourage formation of 'friends walking groups'	Green	Green	→	The 2 day Walk Leader training course was delivered by PCNPA's Walkability Officer in April of this year with 6 participants. The course provides health and safety, navigation and walk planning information combined with a walk for which participants are asked to plan and lead sections. This training (which is provided free of charge) is one of the resources we have to offer in enabling more walking group activity to take place. We have been talking to the Health Board in recent months with a view to promoting walking opportunities in doctors surgeries locally. The Authority has produced a Walking Groups Directory for Pembrokeshire that provides information on around 30 groups actively offering walking opportunities locally. Details of how to access these opportunities are included in the directory.
Confirmation of continued support for bus service (Greenways)	Green	Green	→	Funding confirmed for 2017/18.
Refugee involvement in activities and opportunities if the Authority – Walkability, Youth Rangers, Activities, Centres	Green	Green	→	National Park Authority is aware of refugees coming to Pembrokeshire and we are working towards some involvement.

Objective 4 – Equality

Data Available Monthly							
May 2016	May 2016	2017/18 Previous Period - April 2017			2017/1	8 Current Pe	eriod – May 2017
	Actual	Actual	Actual	Target	RAG	Trend	Comments
# of web wheelchair walks downloaded	New Indicator	345	687				9.1% of the web walks downloaded in May, 9% of web walks ytd.

Data Available Quarterly – First set of data for 2017/18 for the following will be available end of July 2017					
# EIA Screenings completed	% Equality Monitoring Information Completed on Pobl y Parc				
# EIA completed and outcomes reported to Members ytd	# hard to reach (Social Inclusion) people engaged with ytd				

Data Available Annually			
Measure			2016/17 data
	Actual	Target	Comment
# Beach Wheelchairs hosted	8		Beach Wheelchair now hosted at Freshwater East.

Action						
Measure	Previous Period April 2017	Current Period May 2017				
	RAG	RAG	Trend	Comments		
Activities undertaken to provide traineeship and volunteering opportunities	Green	Green	→	The 'Pathways' project starting in the Summer of 2017, focuses on the benefits of volunteering as one of the 'pathways' for people to experience the outdoors. Supported opportunities to join in voluntary activity across the National Park will be made available		

			to more than 2000 individuals from disadvantaged groups as part of a 3 year project. Participants will be encouraged to develop new skills and enrich their experience of the outdoors through learning and training opportunities delivered in parallel to their volunteering. Through voluntary input the project will achieve significant environmental improvements for communities in and around Pembrokeshire Coast National Park. Alongside the project's focus on individual benefits (in spending more time outdoors) we will also be seeking to build the capacity of local groups and organisations to work outdoors with disadvantaged groups. This will be achieved through a 'training and learning pathway', with the project team working alongside specific groups to showcase good practice in working outdoors with specific client groups and in providing tailored support for staff and volunteers.
Equality Monitoring Data on Applicants reported Annually	Green	Green	→ Data to be included as part of Annual Report on meeting Well-being Objectives. Personnel collating data for its inclusion in report.
Work with partners to promote accessible and inclusive tourism	Green	Green	Attended Social Tourism Roundtable. Discovery in the Dark photography commission to provide images to promote accessible tourism / visitor experiences. Attended Pembrokeshire Play Partnership meeting and discussed Play Day opportunities for children of visitors and residents.
Audit of customer facing and promotional services to identify gaps in service delivery and barriers for specific groups	Green	Green	→ Audit template and approach in development.
Equality awareness activities – Staff & Members	Green	Green	Meeting between personnel and performance arranged for June to discuss programme. Calendar and information in development.
Welsh Government mentoring scheme			Mentoring scheme not continued due to Welsh Government appointing a third new Member to commence in February 2018. To be reviewed in March 2019 in preparation for new WG appointments in 2020. Action complete.
Development of model to enable young people to inform and	Green	Green	Research being undertaken into potential models available. Involvement as external partner with Swansea University in bid for

contribute to the development of the next National Management Plan				Cherish-De funding available to carry out a pilot project with the following working title - "Developing a Digital Tool to investigate the views of young people living in the National Park about their connection to the Landscape".
Development in terms of changes to NJC scales	Green	Green	→	From 1st April 2017, the NPA implemented the revised Living Wage rate of £8.45 ph. WLGA pay consultation meeting set for 25th July 2017, where they will consider the work being undertaken to 'modernise' the NJC pay spine.
Development of Engagement Plan	Green	Green	→	Engagement Plan for 2018/19 Corporate Plan in development.

Objective 5 – Community

Data Available Quarterly – First set of data for 2017/18 for the following will be available end of July 2017				
% Affordable Housing Units Approved ytd	# Community events and fairs held at centres ytd			
# Affordable Housing Units Approved ytd	# Community groups using OYP ytd			
# Youth Rangers	% of enforcement cases investigated (determined whether a breach of			
	planning control has occurred and, if so, resolved whether or not			
	enforcement action is expedient) within 84 days			
# Young people engaged with through Youth Clubs ytd	Average time taken to investigate enforcement cases in days ytd			
# Community engagement events Rangers/ Discovery Team/ Centres	% of enforcement cases where enforcement action is taken or a			
ytd	retrospective application received within 180 days from the start of the			
	case (in those cases where it was expedient to enforce)?			
# attending pop up events ytd	Average time taken to take enforcement action in days			

Action						
Measure	Previous Period April 2017					
	RAG	RAG	Trend	Comments		
Interpretation projects involving and supporting community groups to tell their stories about the National Park	Green	Green	→	Meeting with Solva Heritage Group on 23 May to discuss a heritage trail in the Whitchurch parish, looking at potential trails and providing advice on how to create a trail.		
Work engaging with new community groups and communities through INNS	Green	Green	→	Involvement to date includes the following community groups operating in and around the project area: Coed Cymru, Cymdeithas Llandudoch, Friends of the Pembrokeshire Coast National Park, Keep Wales Tidy, Nevern Anglers, Newport Paths Group, Pembrokeshire Coast National Park Youth Rangers and Voluntary Wardens, Pembrokeshire Rivers Trust, Tir Coed. New community stakeholders will be added to the list on an ongoing basis.		
Mapping exercise – identification of communities with limited engagement	Amber	Amber	→	Mapping activities have yet to commence.		

Identify new opportunities to maximise community use of our facilities	Green	Green	→	OYP facilities used by Babi a Fi and Memory Café in May.
Development of a custodian volunteering scheme for 'stretches of path', historical sites and other sites in the Park	Amber	Amber	→	Not commenced yet, pending appointment of Volunteer Coordinator.
Implementation of new online document management facility	Green	Green	→	Work to implement the Document Management System has commenced and a timetable for implementation agreed. It is expected to 'go live' with the system October 2017.
Development of methods to capture positive impact of front line services on communities	Green	Green	→	Template produced for Discovery Team to collate case studies and feedback. Approach to analysing qualitative data from Centres being developed.

Objective 6 – Culture

Data Available Monthly							
Measure	May 2016	2017/18 Previous Period - April 2017	2017/18 Current Period – May 2017				
	Actual	Actual	Actual	Target	RAG	Trend	Comments
# of sites of historic interest communities involved with ytd	New Indicator	2	3				Sign placed at Craig Rhosyfelin to monitor damage to site in conjunction with local community who raised the issue.
# cultural participants ytd	12497	5992	10998	8000	Green	→	Higher number of cultural participants in 2016/17 due to impact of Constable exhibition.
# Gallery visitors ytd	9885	2800	5255				Boost to # Gallery visitors in 2016/17 due to Constable exhibition. Gallery figures are above 2015 figures of 5198.
Gallery conversion rate ytd	34.35	20.02	19.10				Higher Gallery conversion rate in 2016/17 due to impact of Constable exhibition. Gallery conversion rate slightly below 2015/16 rate of 20.86%

Data Available Quarterly – First set of data for 2017/18 for the following will be available end of July						
# participants in historical activities and events ytd	# Activities delivered by Rangers, Discovery and Centres in Welsh ytd					
# School children involved in historic activities through our Education	# School sessions delivered in Welsh ytd					
sessions						
# participants at Year of Legends related events and activities held by	# Community groups using OYP ytd					
the Authority ytd						
% Buildings at Risk	# Community events and fairs held at centres ytd					

Action				
Measure	Previous Period April 2017			Current Period May 2017
	RAG	RAG	Trend	Comments
Gateways to the National park resources	Green	Green	→	Interpretation work at Saundersfoot car park – 2 Welcome Panels in progress. Interpretation work at Poppit - new welcome to Poppit sign at the car park entrance and an interpretation panel inside the bus shelter.
Implementation of Staff Welsh Language Development Plan	Amber	Amber	→	Plan being developed.
Involve education/ social inclusion groups and Wardens in the building of the round houses at Castell Henllys	Green	Green	→	Community Archaeologist has liaised with Castell Henllys regarding allowing local primary school children in for free at Castell Henllys in order to see the dig after 3 o'clock and they agreed. In May letters were sent to Bro Ingli, Llanarchllwydog, Maenclochog and Eglwyswrw primary schools informing them of the archaeological excavation and inviting them to Castell Henllys. Community Archaeologist has liaised with Communities First and with our Walkability officer regarding giving a walking tour of Nevern area and ending up at the excavation at Castell Henllys. Tour delivered to the Communities First group from Pembroke Dock on the 8/6/2017.
Support Community Groups in the park restore historic sites of interest	Green	Green	→	'Vulnerable landscapes' sign placed at Craig RhosyFelin site due to the local community raising the issue of people damaging the bluestone quarry. Liaising with Tim Darvill regarding SPACES project and future community engagement. Monuments at Risk survey: About 15% of all Scheduled Ancient monuments surveyed so far. The survey has already shown some sites need to have repair work done, in particular the cairns on the Preseli ridge. Collaborating with Richard Vaughan to organise volunteers to help fix the cairns.

Objective 7 - Global

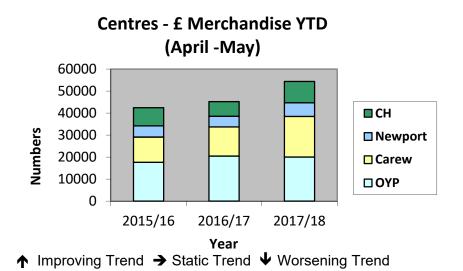
Data Available Monthly							
Measure	May 2016	2017/18 Previous Period - April 2017	2017/18 Current Period – May 2017				
	Actual	Actual	Actual	Target	RAG	Trend	Comments
# changing Coast photo submissions	New Indicator	66	130				Participant Feedback - "This is a really great project"

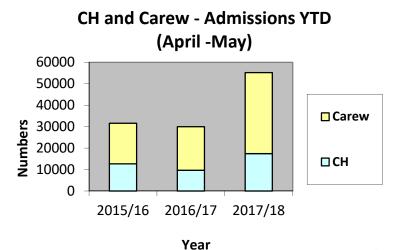
Data Available Quarterly – First set of data for 2017/18 for the following will be available end of July							
# datasets uploaded to biodiversity information centre # participants events and activities programme							
% SDF allocated ytd	# John Muir Family Awards awarded						
Schools average feedback rating (1-11) - Inspiration	# School children engaged with ytd						
Public Average feedback rating (1-11) – Inspiration ytd							

Action					
Measure	Previous Period April 2017	Current Period May 2017			
	RAG	RAG	Trend	Comments	
Public Service Board Involvement - Well-being Objectives and Plan	Green	Green	→	Well-being Assessment published 2 nd April. Work ongoing on development of Well-being plan.	

Governance and Financial Stability

Data Available Monthly							
Measure	2016/17 data – May 2016	2017/18 previous period - April 2017	2017/18 Current Period – May 2017				
	Actual	Actual	Actual	Target	RAG	Trend	Comments
Members attendance ytd	82.35	0	85.37	75	Green	^	
% Members Training	38.89	0	0	65	-	-	% at 0 as no training has been held ytd.
% Positive/ neutral media coverage	100	100	99.34	80	Green	→	
£ Centres Merchandise	45220.68	27087.21	54367.11				20% increase on last year. Positive impact of Easter on April figures.
£ Admissions Carew & CH	29981.27	30964.82	55220.50				84% increase on last year. Positive impact of Easter on April figures.
£ Centres Other Income		847.80	2489.46				Includes Schools and Activities and Events Income from Centres.





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Data Available Quarterly – First set of data for 2017/18 for the following will be available end of July 2017						
Days lost/fte quarterly	# Conflict incidents ytd					
# RIDDOR ytd	# Safeguarding ytd					
# Accidents (Injury) over 3 days/ up to 7 days absence ytd	# Welsh Language Standards complaints ytd					
# Accidents (Injury) Minor ytd	# new & vacant posts advertised ytd					
# Vehicle damage ytd	# new & vacant posts advertised Welsh Language Essential					

Action						
Measure	Previous Period April 2017	Current Period May 2017				
	RAG	RAG	Trend	Comments		
Investigate alternative delivery mechanisms	Green	Green	→	Alternative delivery being trialled in Tenby. Community in Newport developing alternative proposal by 1st August.		
Achieving Advanced Members Charter	Green	Green	→	Joint Planning training with PCC. 5 out of 7 new Members attended, together with some more established Members.		
Annual performance reports on Welsh Language Standards	Green	Green	→	Report in process of being drafted for approval at June NPA meeting.		
Annual performance report - Equality	Green	Green	→	Equality Performance Report 2016/17 has been incorporated into the draft Annual Report on Well-being Objectives/ Improvement Plan 2. Personnel staff collating 2016/17 employment data for the report.		
Wales Audit Office Governance Review	Green	Amber	Ψ	Members and Staff Workshops carried out by Wales Audit Office in March following on from online survey of Members and Staff. Results of Survey have been distributed to Staff. Awaiting report from Wales Audit Office.		
Preparation for General Data Protection Regulations	Green	Green	→	Paper completed and distributed to relevant staff on recommended activities that the Authority should undertake to ensure it is prepared and complies with the Regulation when it comes into force in May 2018. Meeting arranged in July to discuss paper and actions.		

Review of Enforcement Figures 2016/17

Officers have reviewed enforcement data and how information is presented. APAS are currently undergoing a quality review of all our reports. Data from Ffynnon will now be collated and presented in line with the statutory indicators for enforcement investigations and action. Please see below enforcement figures for 2016/17:

Enforcement cases investigated (determined whether a breach of planning control has occurred and, if so, resolved whether or not enforcement action is expedient)

	PCNPA	Comment
	2016/17	
Number of enforcement cases investigated in 12 weeks or less	80	Performance was low due to one of
More than 12 weeks	69	the Enforcement officers being on
Total number of enforcement cases investigated	149	maternity leave.
Percentage of enforcement cases investigated (determined whether a	54%	
breach of planning control has occurred and, if so, resolved whether or		
not enforcement action is expedient) within 84 days		
Average time taken to investigate enforcement cases	199	

Enforcement cases where enforcement action is taken or a retrospective application received within 180 days from the start of the case (in those cases where it was expedient to enforce)

	PCNPA 2016/17	Comment
Number of cases resolved in 180 days or less	111	The average day is high due to
More than 180 days weeks	37	ongoing clearing of old enforcement
Total number of enforcement cases resolved		cases, some of which date back to
Percentage of enforcement cases where enforcement action is taken or a retrospective application received within 180 days from the start of the	75%	2013.
case (in those cases where it was expedient to enforce)? Average time taken to take enforcement action	284	