



City of Westminster

# Cabinet Member Report

<b>Decision Maker:</b>	Cabinet Member for Built Environment Cabinet Member for City Management and Customer Services
<b>Date:</b>	11 July 2016
<b>Classification:</b>	For General Release
<b>Title:</b>	Adoption of the Code of Construction Practice
<b>Wards Affected:</b>	All
<b>City for All Summary</b>	The council's Code of Construction Practice is instrumental to the successful implementation of the council's statutory planning, environmental health and highways policies and standards. It is key to managing the construction impacts of development, including basements, and as such contributes to the Heritage strand of City for All.
<b>Key Decision:</b>	Yes, notice of the decision was published on 18/03/2016
<b>Financial Summary:</b>	The Code includes fees for the monitoring and inspections associated with the Code, applicable to the larger Level 1, Level 2, and basement applications.
<b>Report of:</b>	Director of Policy, Performance and Communication.

## **1.0 EXECUTIVE SUMMARY**

- 1.1 Following a decision to undertake consultation on the draft of the new Code of Construction Practice ('the Code'), this report summarises consultation responses, sets out how these have been taken into account, and seeks a decision to adopt the new Code of Construction Practice.
- 1.2 The Code will apply minimum standards and procedures required to reduce the impact of construction, and introduce compliance monitoring and inspections by dedicated Environmental Inspectorate officers from within City Management & Communities, funded through charges to recover time spent.

## **2.0 RECOMMENDATIONS**

- 2.1 That the Cabinet Members resolve:
  - i. to consider the responses to the Code of Construction Practice (summarised at section 5 below and in full at Appendix 1) and endorse the officers' comments thereon and the resulting changes proposed to the Code.
  - ii. to recommend the adoption of the Code of Construction Practice (Appendix 2 to this report), and its application by condition to new applications for basements with immediate effect, and for other major development (Level 1 and Level 2 schemes granted after 1<sup>st</sup> September 2016).
  - iii. to delegate to the Director of Policy, Performance and Communications, power to make minor modifications to the Code of Construction Practice subject to consultation with the Cabinet Member.

## **3.0 REASONS FOR DECISION**

- 3.1 Adoption of the new Code, and the associated new service to implement this, is essential to the successful management of amenity impacts arising from construction sites. In the context of a growth agenda a managed approach to construction impacts is essential. The shift to a funded service, rolled out to all 'major' schemes as well as all residential basements will build capacity within the council enabling a proactive response, which can also be funded sustainably. The Code requires more from developers themselves in terms of neighbour liaison, and coordination with other construction sites to minimise disruption. The increased oversight that the Code will bring about will enable the new Code 'team' to better manage these impacts.
- 3.2 Central to the success and effectiveness of the council's new basement planning policy is a requirement that these are subject to the Code of Construction Practice. This will facilitate monitoring and inspections and efficient arrangements in respect of construction site traffic and deliveries, and other aspects, arising from basement developments, that can impact amenity for neighbouring uses. An Article 4 Direction, due to come into effect on 31

July 2016, will suspend permitted development rights with regard to basements beneath dwellinghouses, ensuring that these sites, which until now have been outside the planning process, are also subject to the provisions of the basements policy, including the Code of Construction Practice. The Code has been carefully drafted to mitigate harmful construction and other impacts on residents and on the residential character of the City of Westminster.

#### **4.0 BACKGROUND, INCLUDING POLICY CONTEXT**

- 4.1 As a world class centre of investment, employment and entertainment, Westminster experiences high levels of development interest, with the number of planning applications submitted consistently around 12,000 p.a. Developments range from large, commercially mixed developments in the Central Activities Zone (CAZ), West End and Paddington to smaller to medium sized residential developments of up to 10 units, which comprise over 90% of housing schemes completed in the city. Increasing numbers of large residential basement development applications have also been received. However, with an established residential community knitted into its dense, historic, urban form, the construction of these projects can result in substantial adverse environmental impacts, which includes significant disturbance to local residents and businesses. The new Code aims to provide closer control, monitoring and coordination of construction works (including, where relevant, demolition activities).
- 4.2 The current Code, dating from 2008, is only applied to the largest strategic developments ('Level 1' schemes), with compliance secured by a planning condition, with monitoring then funded via s106 legal agreement. Because the majority of development sites are not covered under the current Code, complaints are dealt with reactively, and are unfunded, placing a strain on the Council's budget.
- 4.3 Changes to the operation of the new Code service include changes to the stage at which detailed construction management plan or site environmental management plan must be submitted, removing this from the planning application process. This will improve efficiency, and outcomes, as requiring the detailed information relating to construction management upfront with the planning application often results in inadequate documentation being submitted, at a stage when proposals are not fully formed, with, for example the principal contractor yet to be appointed. Furthermore planning officers are not appropriately qualified or resourced to interrogate the detail of such documentation, resulting in a sub-optimal outcome. The new code will not be directly linked to the planning application process or timescale, nor will charges be secured via s106. A condition will be imposed requiring developers to sign up to the Code, which binds them to comply with its terms and conditions including payment of charges and supplying information such as a Site Environmental Management Plan or Construction Management Plan. This change better reflects the operational structure with which the Code is embedded, managed by the Environmental Inspectorate within City Management and Communities. It also addresses an issue arising from a

2015 High Court judgement against Oxfordshire County Council on the charging of administrative and monitoring fees associated with s106.

- 4.4 City Management and Communities are working with the Business and Performance Team to map the new service and ensure all processes are in place to be able to be fully operational from September.
- 4.5 Applications for basement development received after the publication of this Code may be made subject to the Code requirements, in line with the emerging basements policy, and in accordance with para 216 of the National Planning Policy Framework which sets out the extent to which emerging policies can be a material consideration in determining planning applications.

## **5. Consultation**

- 5.1 Consultation on the new Code was undertaken from Monday 25 January – Monday 22 February 2016. The shorter than usual timescale was necessary to tie in with the statutory City Plan Basements Revision hearing on 8<sup>th</sup> March 2016. The consultation was targeted at all planning policy contacts, as well as all contacts of the Highways Management Team, consisting of construction firms and developers. However to mitigate the effect of shorter than usual period, consultees were given prior notification to ensure they could programme their response within the timescales. Late submissions, unrelated to the basements examination hearing were also accepted up until 27 March. To further improve response rates a survey was produced to accompany the Code, with targeted prompt questions that summarised key changes in the document. A well-attended breakfast briefing event was also held on 12<sup>th</sup> April, following the close of the consultation period, hosted jointly with the Westminster Property Association. It is noted that there is no statutory requirement regarding consultation as this is essentially a non-statutory document albeit that it has statutory implications when applied via the planning process.
- 5.2 The costs associated with basements applications had already been made public as part of the consultation on the Council's Regulation 19 stage Basements Revision, from July – September 2015.
- 5.3 The consultation resulted in 30 responses from a range of groups including individual residents, amenity societies, construction firms, neighbourhood forum, businesses and business groups and 'noise-sensitive' organisations. Support was noted from across all types of respondees with 18 responses specifically stating their support, 2 partial objections (concerns around whether the development industry were sufficiently aware of the Code requirements, and questioning the need for charges to monitor environmental matters). Other responses supplied constructive comments. Key responses raised are outlined below, together with an indication of how the Code has been amended to respond.

## **6. Key issues arising and how these are being taken into account**

### **6.1 Issue 1: Noise-sensitive businesses**

A number of noise-sensitive businesses (e.g. Nimax, The Theatres Trust and

the UK Screen Association, hotels) whose business can be very seriously impacted by noise and vibration responded to the consultation setting out their concerns that the Code does not provide sufficient protection specifically with regard to noise-sensitive businesses. A number of suggestions were made, mostly relating to early liaison and negotiation of specific quiet periods to match the specific needs of the business in question, e.g. agreed quiet periods during theatre performances, agreements around keeping site entrances clear during changeover periods, or in proximity to media- and post-production houses ensuring that such quiet periods are aligned to enable an entire programme to be edited, which may require a slightly longer period than the usual 'quiet' window for example.

**6.2 Response:** Changes have been made to the Code to ensure that requirements for early liaison specifically refer to these noise-sensitive receptors. A definition of 'noise-sensitive receptors' consistent with that in the City Plan, has been included to capture those whose core business is directly impacted by noise and vibrations. Furthermore changes have been made to specifically allow sites in proximity to noise sensitive businesses to be upgraded to a higher Code 'Level', with the higher fee enabling increased monitoring visits. Site specific liaison at an early stage is also key, especially when balancing concerns from different groups, e.g. residents who may wish for later starts and businesses. Flexibility has also been introduced for the Code to be extended to very major refurbishments of such a scale that the impacts are equivalent to a new build in proximity to such uses.

### **6.3 Issue 2: Awareness-raising amongst developers**

Concerns from construction companies included a concern that developers would not be aware of the need to comply with the Code, resulting in unrealistic programme expectations that do not take account of the need for stakeholder liaison for example.

**6.4. Response:** This concern is legitimate, and in part can be addressed by ensuring that early discussions take place regarding the Code of Construction Practice and its contents. However it cannot be entirely addressed via changes to the Code itself. The Westminster Property Association Breakfast Briefing event held in April 2016, included discussion on the need for awareness raising from amongst industry itself. In addition a communications plan has been worked up with support from the council's Communications Department. The overarching aims of this will be to:

- Position the council as the leading organisation in taking all the necessary measures to protect Westminster, its history & architecture and places of interest for residents and visitors alike, aligned to our ambitious 'City for All' strategy 'so that every neighbourhood remains a great place to live, work, invest in, and visit, both now and in the future' and the 'Right growth' overarching communication campaign.
- The council's current Communications Strategy and Workplan places greater focus and emphasis on increasing advocacy and trust ratings. This campaign will promote the Code of Construction Practice to reduce the impacts of construction (e.g. environment, noise pollution,

use of the highway, neighbourhood engagement) with a dedicated super team of enforcers, the 'Environmental Inspectorate'.

### **Campaign Objectives**

1. Highlight the new innovative service by securing targeted media coverage and managing the council's reputation by reaching out to residents and businesses and raise awareness of the issues with the public at large through our website and social media channels.
2. Showcase the council as being on the side of its residents, local businesses and visitors alike through this integrated and targeted communication campaign.

### **Proposed approach:**

The communications campaign will be split into a first phase (basements) and second phase (main launch), with most of the focus at phase 2, including include advance notification to key media contacts, securing trade and pan-London press, and broadcast coverage if applicable with lead Cllr interviews, specialist trade press features and coverage, as well as social media/digital activities.

#### **6.5 Issue 3: Upgrading at a late stage in the process**

Contractors have also voiced concern that late 'upgrading' of sites, from one level to another, particularly post-appointment of the principal contractor might lead to the increased charges associated being passed on directly to the contractor.

- 6.6 **Response:** Early liaison with the Environmental Inspectorate would enable sites to be classified at an early stage. Changes have therefore been made to the timing at which the 'Levels' will be set, with an expectation that this is considered at the very earliest stage. The Environmental Inspectorate will decide on the 'Level' of the scheme based on this early discussion, and on any issues and concerns arising at planning stage. The Business Service Process mapping will also reflect this change, ensuring that the 'level' of a scheme will be fixed at the point of the developer entering into the contract with the Council. Factors such as proximity to 'noise-sensitive' receptors will be relevant to this.

#### **6.7 Issue 4: Green/planted hoardings**

The code contained specific provisions 'encouraging' the use of 'green hoardings' where hoardings are of 50m length or more. Some respondents suggested that the benefits that such hoardings bring, both in terms of visual improvement, but also in potentially trapping dust and reducing noise were such that rather than linking to the dimension of the hoarding, it might be more appropriate to link to the amount of time that the hoarding is likely to be required.

- 6.8 **Response:** Because the cost of provision will be higher than a standard hoarding, linking to the amount of time the hoarding will be in place, ensures the additional investment is only required where the hoarding will be in place

for a reasonable period of time, to justify the investment. The Code retains the 50-metre figure, but also links to the length of time the hoarding is in place. In addition, references have been made to recycled (and recyclable) hoardings which can contribute to a reduction in site waste.

#### 6.9 **Issue 5: Employment Targets**

The Code contains a target for 10% of the largest 'Level 1 schemes' to be required to employ 'local' staff. Submissions regarding the difficulty of achieving this from within Westminster, and from within the central London boroughs were received.

6.10 **Response:** The Council considers there is flexibility in the wording of the local employment target already, and that evidence points to an appetite from industry to respond to such a target. Other London boroughs apply similar targets. The Council will connect developers with local programmes and providers and developers need to demonstrate best endeavours to achieve the target. The aim is also consistent with the council's adopted City Plan Strategic Policy S19 Inclusive Local Economy and Employment.

#### 6.11 **Issue 6: Construction Waste Targets**

The draft code sought developments to prepare a Site Waste Management Plan (SWMP) setting out how it would achieve a waste target of less than 7.5m<sup>3</sup> or 6.5 tonnes per 100sqm. Consultation responses from several sources have been received which oppose this on the basis that it is too difficult, and almost never achieved in practice despite industry efforts, which are already incentivised by financial costs of dealing with waste. The difficulties are particularly acute with development which includes fit-out due to the very large volumes of protective packaging that comes with fit-out components and materials. An example of the difficulty faced by contractors here was illustrated by way of the example of waste timber, which, even if donated to charities for reuse, must still be classed as waste.

6.12 **Response:** In response to comments received, the Code has been amended to require project-specific waste targets, in line with WRAP best practice, but with a target for less than 13.3 m<sup>3</sup> per 100sqm, with an aspiration to achieve a more stringent target of less than 7.5m<sup>3</sup> per 100sqm where feasible.

#### 6.13 **Issues 7: Cycle Safety**

A number of suggestions were made to further strengthen the cycle safety section.

6.14 **Response:** While the draft CoCP requirements relating to cycle safety are largely similar to the requirements that TfL apply which refers to the risks vulnerable road users are exposed to from vehicles, the following points have been added to further strengthen this area:

- Added in a requirement for sites to adopt the CLOCS (Construction Logistics and Cyclist Safety) standard as recommended by the Construction Industry Cycling Commission manifesto.
- Added in a requirement for sites to aim to achieve and maintain the higher Fleet Operator Recognition System (FORS) accreditation rating of silver. While FORS is a broader scheme than CLOCS, at a silver level it aligns to the

CLOCS standard, such that a 'FORS' silver rating will automatically achieve the CLOCS standard. Under FORS, maintaining a standard is the key to achieving a higher rating.

- Required sites to work towards achieving and maintaining a higher 'gold' rating.
- Required an audible warning to other road users of the HGV driver's intention to turn left.
- Added a requirement for drivers to inform their employer of any health concerns that might affect their ability to drive.

6.15 In addition a number of other changes have been made in response to consultation responses. These are summarised below:

<b>Point raised</b>	<b>Response</b>
Working hours - comments that the Code should further restrict when builders can enter a property	This is not enforceable by the council.
Code should list the enforcement penalties included.	The Code does not introduce any new enforcement powers or any 'penalties' as it is based on ensuring good liaison, with monitoring and inspections funded, to ensure ongoing good practice.
Development sites should be required to answer phones etc within set number of rings.	This is not enforceable by the council.
Code should be less prescriptive on timings/frequency of neighbour liaison meetings	Flexibility introduced in the Code.
Aspects of Code around advertisement on hoardings may conflict with estate management guidelines.	Some changes have been made to reflect the fact that advertisements may not be allowed where an estate management scheme or lease dictates, although site contact details will still be expected.
To allow development to commence early suggested that submission of CMPs and SEMP should be allowed with the planning application.	While early submission of a CMP may on occasion help raise issues for early consideration, submission of an incomplete CMP, or one submitted without input from the contractor would not be acceptable, and the council would reserve the right to request a full CMP. Furthermore this does not replace the process under s61 Control of Pollution Act 1974 for 'Prior Consent' for noisy works. It would also have the effect of opening the CMP/SEMP up to public consultation if submitted as part of the planning application.



Points raised over wording relating to welfare accommodation and site offices, on gantries over the highway.	The Code distinguishes between site offices and welfare accommodation, and is sufficiently clear that welfare accommodation applications will be considered on a case by case basis.
Clarification throughout the document over the party that is responsible.	In many instances it may either be the developer or the contractor who will in practice supply certain information or respond on a particular point. Changes made to the document to further clarify this.
Additional detail requested regarding highways reinstatement responsibilities.	This is not considered necessary, as the detail will be agreed via a s106 or s278 agreement, and otherwise will be undertaken by the highways contractor at the applicant's expense.
Points raised around noise level surveys and monitoring	Amended wording relating to necessary qualifications of those undertaking noise monitoring.
Archaeological Priority Areas under review, suggested to remove reference to specific number within Westminster	Reference to number of APA's in Westminster removed.
Additional clarity sought regarding whether the council or TfL is the 'Highway Authority' as well as insertion of a map to assist understanding.	Additional paragraph inserted, amended references to refer to the 'Highway Authority' rather than the council to ensure document is not misleading as to which party is the Highway Authority. Additionally the insertion of a map showing the Transport for London Route Network and Strategic Route Network.
Suggestion that an overarching indemnity against all construction related activity be included	Issue to be considered separately at a future point rather than as part of this Code of Construction Practice.
Additional references to Marine Planning and Licensing to be included.	Inserted paragraphs relating to marine planning and licensing.
Requested reference to encouraging the use of the river specifically to transport materials and remove spoil.	Additional text inserted.

## 7.0 FINANCIAL IMPLICATIONS

- 7.1 The main financial implications relate to the collection of fees under the Code in order to implement it. All basement development will be required to comply with the code, and the initial signing up to the code will be secured by a condition. By signing up to the CoCP, basement developers will have agreed to a service of monitoring and inspections during the construction phase to address potential issues arising with neighbours. This service will be paid for

by the developer, recharging on an hourly rate basis to cover the costs of service provision. There are therefore implications related to fees and service provision for the Council.

- 7.2 The CoCP and the proposed level of fees payable are set out in Appendix 1 of the Code. These are set on a cost recovery basis and include an estimated 'range' of fees associated with the different 'Levels' of the Code. This varies according to the number of monitoring visits required, and fees have been broken down to show how these are charged. A similar schedule of fees associated just with basement development were contained in the supporting information provided with the Basements Publication Draft City Plan Revision, consulted on from July – September 2015. The Council will be recovering the cost of the service through the fee charging mechanism.

## **8.0 Operational Implications**

- 8.1 The provision of a fee-based Code of Construction Practice Service has implications for staffing, specifically within the City Management and Communities Directorate. Some of the staffing will be met by existing staff, who will have reduced workloads through reactive complaints arising from basement development as a result of the new pro-active service. Additional resource will be provided through the fees.
- 8.2 With regard to the operational impact on development planning, the intention is to reduce the involvement of planning. Rather than being involved in the process of 'signing off' the SEMP's or CMP's, the involvement of planning will be limited to:
- setting a condition requiring applicants to submit Appendix A of the Code, which effectively creates a series of obligations to agree to comply with the contents of the Code, to agree to monitoring and inspections, and to pay charges associated with this;
  - alerting applicants to the Code at pre-application stage and during the course of negotiations post application, to ensure that colleagues in environmental health are engaged as early as possible with developers;
  - assisting colleagues in EH in determining whether an application is level 1 or 2 through ensuring they are aware of consultation responses from local residents and businesses. This should highlight noise sensitive uses for example.
  - The role of development planning enforcement officers will be limited to cases where work starts on site (in breach of planning condition) without Appendix A having been signed and confirmation given by the Environmental Inspectorate. Subsequent breaches of the Code will then be dealt with by the Environmental Inspectorate with support from other teams including legal as necessary.

8.3 The Deputy Director of Planning has been involved in the development of the new Code of Construction Practice, has reviewed and approved this report, the legal advice on which the new approach is based, and the draft Code of Construction Practice. It has been discussed at the planning management meeting.

## **9.0 LEGAL IMPLICATIONS**

9.1 As noted in 3.2 above, application of the basement policy is contingent on the Council's Code of Construction Practice, a fee-based monitoring service. The "general power of competence" under Section 1 of the Localism Act 2011 provides local authorities with the power to "do anything that individuals generally may do". This effectively allows authorities to act in their own financial interest and, inter alia, to raise money by charging for discretionary services.

9.2 The power to charge under the Localism Act is however subject to several constraints, which are set out in s3 of the Act. In particular a local authority may not charge for services which it is already legally obliged to provide, or for which it already has a discretionary power to charge under an alternative piece of existing legislation. Any charges made under the Localism Act are also limited to the amount required to recover the cost of providing the service in question.

9.3 There are existing statutory powers to charge fees in respect of a number of the services to be provided under the Code; accordingly these will not be covered by the charges made under s1 of the Localism Act 2011.

9.4 Subject to compliance with the statutory guidance set out in the legal implications paragraph of this report the Director of Law is satisfied that the introduction of a fee-based mechanism in order to manage the construction impacts of basement development is legal and appropriate.

## **10.0 BUSINESS PLAN IMPLICATIONS**

10.1 Delivery of the Code of Construction Practice to support better management of construction impacts is a key City for All priority.

## **11.0 IMPACT ON THE ENVIRONMENT**

11.1 The Code of Construction Practice is anticipated to have a positive impact on the environment, particularly in respect of noise and vibration, dust and air pollution, extending the requirements of the Code to a larger number of sites, including all residential basements and all new build 'major' development sites. Additionally it will have a beneficial impact on the cumulative impacts arising, through the oversight it will afford the council, and from this, the ability to require better coordination of impacts on neighbouring uses. This is in line with the findings of the Integrated Impact Assessment, (and updated

'addendum' to this) undertaken in respect of the Basements Revision to the City Plan which was predicated on the council bringing forward the new Code of Construction Practice.

## **12.0 HEALTH, WELLBEING IMPACT ASSESSMENT INCLUDING HEALTH AND SAFETY IMPLICATIONS**

- 12.1 The Code of Construction Practice covers matters relating to health and safety, as well as factors which affect health and wellbeing, including noise and pollution. Accordingly the Code is expected to have a positive impact on these matters through its provisions relating to security, hoardings, lighting which are of relevance to crime and disorder. This is in line with the findings of the Integrated Impact Assessment, (and updated 'addendum' to this) undertaken in respect of the Basements Revision to the City Plan, which was predicated on the council bringing forward the new Code of Construction Practice.

## **13.0 EQUALITIES IMPLICATIONS**

- 13.1 In addition an Equalities Impact Assessment screening has been undertaken for the Code of Construction Practice, which found positive benefits associated with the Code.

**If you have any queries about this Report or wish to inspect any of the Background Papers please contact: Nina Miles on 0207 641 1081 or email [nmiles@westminster.gov.uk](mailto:nmiles@westminster.gov.uk)**

## **BACKGROUND PAPERS**

**Cabinet Member Report on Consultation on a new Code of Construction Practice, (January 2016)**

For completion by the **Cabinet Member for Built Environment**

**Declaration of Interest**

I have <no interest to declare / to declare an interest> in respect of this report

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

NAME **Councillor Robert Davis MBE, DL, Deputy Leader and Cabinet Member for Built Environment**  
: \_\_\_\_\_

State nature of interest if any  
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*(N.B: If you have an interest you should seek advice as to whether it is appropriate to make a decision in relation to this matter)*

For the reasons set out above, I agree the recommendation(s) in the report entitled Adoption of the Code of Construction Practice and reject any alternative options which are referred to but not recommended.

Signed .....

**Councillor Robert Davis MBE, DL, Deputy Leader and Cabinet Member for Built Environment**

Date .....

If you have any additional comment which you would want actioned in connection with your decision you should discuss this with the report author and then set out your comment below before the report and this pro-forma is returned to the Secretariat for processing.

Additional comment:  
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If you do not wish to approve the recommendations, or wish to make an alternative decision, it is important that you consult the report author, the Director of Law, Executive Director Finance and Performance and, if there are resources implications, the Executive Director of Resources (or their representatives) so that (1) you can be made aware of any further relevant considerations that you should take into account before making the decision and (2) your reasons for the decision can be properly identified and recorded, as required by law.

Note to Cabinet Member: Your decision will now be published and copied to the Members of the relevant Policy & Scrutiny Committee. If the decision falls within the criteria for call-in, it will not be implemented until five working days have elapsed from publication to allow the Policy and Scrutiny Committee to decide whether it wishes to call the matter in.



For completion by the **Cabinet Member for City Management and Customer Services**

**Declaration of Interest**

I have <no interest to declare / to declare an interest> in respect of this report

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

NAME **Councillor Melvyn Caplan, Cabinet Member for City Management and Customer Services**  
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State nature of interest if any  
.....  
.....

*(N.B: If you have an interest you should seek advice as to whether it is appropriate to make a decision in relation to this matter)*

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Signed .....

**Councillor Melvyn Caplan, Cabinet Member for City Management and Customer Services**

Date .....

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