

Introduction

This improvement plan sets out how Winchester City Council intends to bring about improvement in the service provided by its planning development control activities. Its production has been stimulated by two principle factors. Firstly, the Council has been designated as a planning standards authority for 2005/06 by the Office of the Deputy Prime Minister (ODPM) because its performance in determining major and minor planning applications has fallen below target levels. All planning standards authorities have been asked to produce an improvement plan to demonstrate how they will meet performance targets. Secondly, Members and officers recognise from the number of complaints received that some aspects of the service currently offered fall below the high expectations that we have, particularly in procedure and administration. The City Council does not believe that it runs a 'bad' planning service. However it recognises the need to improve the service in a number of areas.

This plan describes a number of measures to be implemented by the Council. It is an internal document because the improvements it describes are the responsibility of the Council, but its publication represents a public commitment to improvement. Its objectives are consistent with the Council's Corporate Strategy 2005 – 2008 which identifies continuous service improvement as a key area of work.

Speed of decision making is not the only concern. Some of the City Council's decisions will have an impact for years to come. The quality of those decisions and the development which is, or is not, permitted also matters a great deal. We therefore wish to improve our performance in relation to planning outcomes – including good design, environmental quality, the achievement of affordable housing targets and the careful shaping of our heritage – as well as speed of decision making.

The service we provide depends on the team of staff we have. Planning control is demanding and technically skilled work. Recruitment and retention of good staff is critical, and training, improved use of ICT systems and stimulating projects to motivate and support them are essential. Experienced planners are currently in short supply and Winchester City Council needs to be able to attract and retain them.

Our Members need training and information to help them with the decisions they have to make as part of the planning process. They need to have confidence in the advice and support given to them by their officers.

Our administrative procedures need to be accurate and timely. Most planning applications need not be difficult or controversial but some are made so when there are errors in processes or procedures. Errors lead to complaints and these take time to resolve which should be spent on ensuring the quality of planning decisions.

The City Council determined some 2,800 planning applications in 2005/06 and expects to process over 3,000 planning applications in 2005/06.

Our performance improvement aims to be achieved by any relevant date and maintained thereafter are as follows:

1. To meet all of our Best Value performance targets for planning services;

Those targets are:

Indicator	Simple Description of the Indicator	Actual for 2004/05	Target for 2005/06	Target for 2006/07
BV109a	How many 'major' planning applications we make a decision on in 13 weeks	44%	60%	60%
BV109b	How many 'minor' planning applications we make a decision on in 8 weeks	54%	65%	65%
BV109c	How many 'other' planning applications we make a decision on in 8 weeks	80%	80%	80%
BV204	The number of appeals against our decision to refuse planning permission that we lose	32.86%	30%	25%
BV205	Our score for quality in planning services using the list set by the Audit Commission	Not recorded	100%	100%

- 2. To achieve consistently high quality in the design and environmental impact of development;**
- 3. To contribute actively to meeting the needs of the community as set out in the Corporate and Community Strategy;**
- 4. To be the local authority planning service in Hampshire that most people would want to work for;**
- 5. To be a service that has credibility, respect and support amongst elected Members, parish councils, development interests and those who are affected by the planning service**

Where are we now?

Graphs showing the speed of determining applications in the three categories specified by the Government over the last two years on a quarterly basis are attached to the plan. They show an improvement in performance in minor and other applications from the second half of 2004. Performance in relation to 'minor' and 'other' applications is now around and about the target level set in BVPI 109. Performance on major applications remains highly variable month on month. In 2004/05 the Planning Inspectorate dealt with 70 appeals against our decisions, of which they upheld just under 33%. In 2003 the Council carried out a survey which included public satisfaction with the planning service through its citizen's panel. The results showed mixed results with no evidence of significant dissatisfaction, but nor did it show an improving trend. The survey will be repeated in the current financial year and will provide an important reference point for the plan. Taking all the available evidence into account

- Performance in dealing with major applications is consistently below target reflecting the complexity and importance of these applications. It is recognised that the ODPM target for major applications turnover is difficult to meet and there is a need to develop improvements to the process that will speed up decision making and are in the interests of the community and produce good planning outcomes. Performance in minor applications has improved and is the area where change in current practice is most likely to create sustained performance improvement. Performance in other cases is on target and needs to be maintained.
- The case-load for each planning case-officer is currently 158 per annum. The ODPM performance guidance uses a nominal indicator that 150 straightforward cases is the most that a case-officer can reasonably be expected to handle properly. Many of the cases we deal with are not straightforward. Case-officers have to spend a disproportionate amount of time on administrative and bureaucratic procedures. ICT infra-structure has not yet produced the performance improvements of which it is capable.

- There is a large backlog of enforcement cases which is gradually being tackled with the increased resources now available. This progress needs to be maintained and the profile of enforcement increased.
- Too many administrative and procedural errors are made. These undermine public confidence in the operation of the service even when this is not justified.
- The City Council **does** take good design seriously and schemes have been improved through the pre-application work which has been carried out with potential developers to date. The Council's performance record at appeal bears out its judgement. It is important to strengthen the relationship with external advice and expertise, as well as developing in-house expertise, to ensure that quality of outcomes can be given the time and attention it needs without compromising speed of determination.

Improvement Objectives

In order to meet our performance targets the service needs to implement a range of improvements in the way in which it works and these will require a range of actions over the next twelve months. These will need to be maintained thereafter.

Following business process analysis within the Development Control team, comparison with other authorities and consideration of performance statistics, it was concluded that all performance improvement objectives should be directed towards achieving one of the following:

■ increasing the time available per officer per case

the professional resources of the team should match the complexity and volume of the work that it has to undertake. Case-officers should spend a higher percentage of their time on technical and intellectual tasks and less on administration and report preparation. Better and quicker outcomes will be achieved if there is more case officer time per case and this can be achieved by maximizing the potential of support staff and ICT systems.

■ reducing administrative and procedural error

procedural errors create delay and waste time spent in dealing with the consequences. They also undermine confidence in the ability of the Council to make good and fair decisions. Procedures should be clearly documented, regularly updated and efficiently implemented by all staff.

■ **manage individual applications more effectively**

meeting specific government performance targets requires 'active case management' – ensuring that we know what stage every application has reached and what needs to be done to ensure that a decision is made in a timely manner. As a result it should be possible to identify potential problems and communicate openly and confidently with applicants and with agents.

■ **improve training, communication and briefing**

training for staff in ICT systems has not been sufficiently coordinated and therefore systems are not as well understood as they should be. There is a need for better understanding of some of the more complex aspects of the development control process. Improved training of and communication with and between officers, Members, parish councils and the public at large would produce a greater understanding of the constraints under which the Council operates. It would also enable the Council to promote the opportunities to create better design and more sustainable communities in accordance with national planning policy.

Risk Analysis

The purpose of the plan is to improve performance and to increase the likelihood of meeting BVPI targets. In accordance with the Council's approach to risk management it is important to identify those key factors which might reduce the likelihood that this is achieved.

The principle risks associated with implementing the plan are:

Ref	Nature of Risk	Consequences	Control Measures
1	Inability to recruit and/or retain key staff at all levels in highly competitive marketplace	Non achievement of performance of BVPI targets Possible loss of PDG Loss of reputation Possible Govt. intervention	Implementation of plan Constant monitoring of structure, pay and rewards in the marketplace
2	Non-availability of financial resources to implement key changes	Non achievement of performance of BVPI targets Loss of reputation Possible Govt. intervention	Review by Members against performance Effective use of PDG and fee income
3	Failure to improve administrative and performance management mechanisms including IT systems	Level of complaints too high Additional workload for staff in correcting errors	Management attention to change Implementation of training objectives
4	Failure to deliver customer care improvements	Loss of credibility Failure to improve performance against BVPI targets	Management attention to change Communication with all staff Training and communication with stakeholders (internal and external)
5	Significant unexpected change in Govt. requirements through guidance or legislation	Improvement plan requires revision. Resources devoted to other objectives	Anticipation of changes ahead
6	Receipt of unforeseen major planning application(s) which absorb significant management time and team expertise	Lack of resources to concentrate on improvement plan objectives	Seek change in resource level to compensate for additional workload (but note risk 1 relating to recruitment and retention)

The Service provided by Planning Control

The Council sets out the planning policies it will implement in the Local Plan Review and other adopted planning policy guidance. In time these will be reviewed and replaced by the documents in the Local Development Framework, the process for which is set out in the Local Development Statement.

Planning control is the process by which these policies are applied to development in the District. It is possible to argue that a planning control process is required to do no more than understand and apply policies and therefore that it is a process which requires no 'vision' or insight of its own. This is far from the truth. The quality of customer service, interpretation of local and national policy, the point at which negotiation stops or continues, the insistence that a design is 'not good enough' are all matters that define how a service is provided and what it seeks to achieve. Those managing the service, officers and Members must balance the requirements of a system governed by statute and policy with achieving outcomes which meet the many and diverse needs of the community. This demands flexibility and a willingness to consider that which is creative and innovative whilst being sensitive to concerns about the future shape of communities.

Planning control is subject to intense public scrutiny since it involves decision making that can have an important effect on people's environment and their enjoyment of their surroundings. In the wider sense though many applications are fiercely debated locally, far fewer are truly of long term significance to the legacy we leave for future generations. These must be given the time and attention they require. The plan sets out our performance objectives which are in accordance with the Council's Corporate Strategy. The planning control service aims to achieve these. In doing so we will aim to behave with the following values:

- to implement the Council's policies and the requirements of planning law and regulation fairly and properly even when that means taking decisions some people do not like
- to do our best to reconcile planning policy with the expressed interests of Winchester communities
- to work with parish councils, amenity groups and local residents to provide advice, guidance and training and to treat their views with respect – particularly when we disagree with them
- to be open and transparent in our dealings and to be willing to explain our decisions fully
- to provide planning applicants with an efficient service which recognises that they have reasonable expectations about how their application will be dealt with

Performance Improvement Aim 1: Achieve Best Value Performance Targets					
ID	Proposed Action	Performance Benefit	Resource Requirement	Post Responsible	Target Achievement Date
1.1	Revise and expand scope and structure of existing planning support team. Incorporate management of letters of representation into planning support team. Initiate routine consultations from planning support team on registration of application.	Greater opportunity to focus on key Best Value targets; allowing flexibility in allocating workloads and rationalising administration roles; stronger monitoring of workloads.	1 post moved from directorate admin to planning support team	Head of Planning Control/Business Manager	Recommendations without resource requirements for immediate implementation
1.2	Establish new post of information and performance officer using ICT to monitor and improve progress and performance.	Introduction of 'active case management' where cases are tracked and chased to hit targets not just 'watched'.	1 additional scale 4 post	Head of Planning Control	New posts to be implemented from 1 April 2006 subject to resources
1.3	Establish additional validation officer post to manage current workload	Current workload is too great for team numbers	1 additional scale 3 post	Planning Support Manager	New posts to be implemented from 1 April 2006 subject to resources
1.4	Re-examine job roles in planning support to consider creating a generic planning support role able to undertake all functions (including responding to routine permitted development enquiries	Greater flexibility and synergy in meeting variable workload situations. Greater range of professional knowledge and expertise in staff	Time required for extra training	Head of Planning Control	Within 3 months
1.5	Revise frequency of Planning Development Control meetings to three weekly cycle with all areas on single day	Reduced period between Committee decisions creates more opportunity for decisions to be put to Members	None but requires adjustment to working practice	Director of Development/Head of Planning Control/City Secretary and Solicitor	November 2005

Performance Improvement Aim 1: Achieve Best Value Performance Targets					
ID	Proposed Action	Performance Benefit	Resource Requirement	Post Responsible	Target Achievement Date
1.6	Use of sub-committees to be restricted only to the most major applications. Sub-committees to be constituted with delegated decision making powers to avoid requirement to report back to main committee	Reduction in time spent in additional meetings. Quicker and more consistent decision making. Reduced confusion to public	None	Head of Planning Control / City Secretary and Solicitor	November 2005
1.7	Increase the threshold for contrary representations triggering a committee report from 4 to 10	More applications determined within the ODPM target dates under delegated powers	None	Head of Planning Control	November 2005
1.8	Parish Council representations to be made to Head of Planning Control. Only to trigger committee referral if justified by the issues raised in the representation not automatically	More applications determined within the ODPM target dates under delegated powers	None	Head of Planning Control	November 2005
1.9	Members to complete standard form setting out material planning reasons for requesting a committee referral. This to be attached to committee report.	More applications determined within the ODPM target dates under delegated powers	None	Head of Planning Control	November 2005
1.10	'Public speaking' by Members to Planning Development Control Committee to be limited to 5 minutes	Reduction in time spent on individual items at Committee	None	Head of Planning Control / City Secretary and Solicitor	October 2005

Performance Improvement Aim 1: Achieve Best Value Performance Targets					
ID	Proposed Action	Performance Benefit	Resource Requirement	Post Responsible	Target Achievement Date
1.11	Revise format of committee reports to reduce length and focus Member attention on important issues and considerations. Include good quality site plan only	Less officer time spent on report writing and more on issues. Shorter but better directed discussions at committee by drawing Members attention to most important issues	None	Head of Planning Control	December 2005
1.12	Cease sending letters to 'representors' following a decision. Replace by a note on Representation Acknowledgement letter indicating that decision can be viewed on the internet or by obtained by phone from Customer Service Centre.	Reduction in time spent by planning support team. Eliminate 'voluntary' item which, if not performed, leads to complaints	None	Planning Support Manager	November 2005
1.13	Reconsider current arrangements for publicity/neighbour notifications. Narrow focus of neighbour notifications	Current arrangements are unclear and have raised public expectation to untenable level. Narrower but better	None	Head of Planning Control/Planning Support Manager	November 2005
1.14	Import on-line applications directly into CAPS/Anite	Reduction in time and cost over current process	To be investigated	Planning Support Manager/ICT support team	January 2006
1.15	Elimination of double-track system of electronic and paper correspondence. Imported into Anite at the <i>time of generation</i> , rather than being printed and scanned. This to include delegated reports etc	Reduction in time and cost over current process	To be investigated	Planning Support Manager/ICT support team	March 2006

Performance Improvement Aim 1: Achieve Best Value Performance Targets					
ID	Proposed Action	Performance Benefit	Resource Requirement	Post Responsible	Target Achievement Date
1.16	Install Anite upgrade to put electronic stamps on plans to eliminate double- and triple-scanning by Scanning Team	Eliminate requirement to print out, stamp and rescan applications	To be investigated	Planning Support Manager/ICT support team	January 2006
1.17	Improve performance and reliability of Public Access software and on-line facilities	Eliminate complaints about performance of system	To be investigated	Planning Support Manager/ICT support team	January 2006
1.18	The Budget process will consider the extent to which Planning Delivery Grant will be used to fund improvements to the planning service and to using future additional income arising from planning fee increases to fund established posts currently being funded by Planning Delivery Grant (PDG).	Funding available to finance improvements to quality and service; maximisation of available resources, focussing them on priority needs.	None	Head of Planning Control	Immediate
1.19	Revise process for obtaining Section 106 obligations. Promote use of unilateral undertakings or draft agreements. Revise existing process for instructing solicitors on Section 106 agreement requirements. Introduce new standard instruction forms. Improve record keeping and	Increased speed in dealing with applications requiring legal agreements; better service to customer	Officer time	Head of Planning Control / City Secretary and Solicitor (Report PDC584 to Planning Development Control Committee 5 October 2005 also refers).	January 2006

Performance Improvement Aim 1: Achieve Best Value Performance Targets					
ID	Proposed Action	Performance Benefit	Resource Requirement	Post Responsible	Target Achievement Date
	performance monitoring in relation to Section 106 agreements				
1.20	Adopt a project team approach to managing all significant major applications	Reduce delays from late involvement of professionals. Better outcomes through involvement of non-planning professionals especially in community development	None	Head of Planning	April 2006
1.21	Produce and implement annual programme of training for Members in development control, conservation and enforcement policy and issues	Improve Member's knowledge of the planning system and keep them up to date on changes and developments. Reduce Member enquiries through better 'up front' knowledge.	Officer time to devise and deliver programme. Approx 4 – 6 two hour briefings per annum	Director of Development /Head of Planning Control/Head of Strategic Planning	Commence October 2005
1.22	Separate out the planning component of the Land Charge function planning support and incorporate with Land Charges team	Clearer responsibility for land charge function rationalisation of staff resources	None beyond those currently planned	Director of Development/City Secretary	When land charge system is computerised
1.23	Establish one additional Principal Planning Officer post to assist in reduction of average caseload per officer	Small reduction in number of cases per member of staff	1 additional scale 6 post	Director of Development	April 2006
1.24	Increase administrative support to planning dc teams	Reduce time spent on administrative tasks to free time for professional duties	None – reallocate resources within Directorate	Director of Development	December 2005

Performance Improvement Aim 2 : Achieve consistently high quality design					
ID	Proposed Action	Performance Benefit /Target	Resource Requirement	Post Responsible	Target Achievement Date
2.1	Increase the overall knowledge and expertise of case-officers in design issues through training and staff development	Improved planning outcomes through more informed pre-application advice.	Allocation of funding from training budget/officer time to attend training	Director of Development/Head of Planning Control	To commence immediately
2.2	Incorporate design expertise as a specific criteria in senior planning post appointments	Improved planning outcomes through greater design experience and understanding	None	Director of Development/Head of Planning Control	Immediate
2.3	Increase the use of external design advisors/advisory groups to increase the expertise available to the City Council in considering relevant applications and issues	Additional advice and guidance available for officers and Members to draw on in decision making	Officer time Agreement from external advisors	Director of Development/Head of Planning Control	March 2006
2.4	Support the preparation of further village design statements and increase the familiarity of case-officers with the purpose and content of design statements	Promote good design in rural areas. Increase public confidence through greater familiarity with VDS content and purpose	Significant resource requirements on local communities. No additional funding from WCC. Officer time in training	Director of Development/Head of Planning Control	December 2005
2.5	Publicise and promote the importance of good design in publicity, training, and consultation	Reduced time spent on planning applications with manifest design faults	New and revised publications will be required with significant officer time to support	Director of Development/Head of Planning Control	March 2006

Performance Improvement Aim 3 : Contribute to the achievement of Corporate and Community Strategy Objectives

ID	Proposed Action	Performance Benefit /Target	Resource Requirement	Post Responsible	Target Achievement Date
3.1	Provide regular briefing for all staff on corporate priorities and objectives in team and staff briefings	Greater staff awareness of long term goals and aspirations	Officer time	Head of Planning Control	October 2005
3.2	Review existing planning 'standard' consultation arrangements to ensure that all relevant topics and issues are covered	'Smarter' decision making to achieve desirable outcomes consistent with planning policy	Officer time	Head of Planning Control	October 2005
3.3	Implement project team approach for major applications so as to incorporate 'outcome' targets into pre-application and application consideration discussions	Fewer unexpected outcomes from planning decisions which require post decision management by other departments	Officer time	Head of Planning Control	October 2005
3.4	Implement recommendations of ODPM 'Diversity and Equality in Planning' guidance	To help achieve corporate social inclusion objectives	To be investigated	Head of Planning Control/Head of Strategic Planning	April 2006

Performance Improvement Aim 4 : Planning Employer of Choice					
ID	Proposed Action	Performance Benefit /Target	Resource Requirement	Post Responsible	Target Achievement Date
4.1	Improve speed of recruitment and replacement of established staff leavers to minimise use of agency staff	Reduce cost, improve consistency; improve morale	None	Head of Planning Control	April 2006
4.2	Review current job descriptions and post designations to improve relationship between posts and internal career development opportunities for staff	Improve retention with consequent benefits in consistency and continuity	To be investigated	Director of Development/Director of Human Resources	December 2005
4.3	Introduce 'active case management' processes to provide better support to case-officers on managing case workload	Improved performance; improved staff morale	Establishment of performance management post	Director of Development	April 2006
4.4	Implement monthly meeting between planning support team and case officer teams to discuss and plan for month ahead	Improved performance through shared understanding	None	Head of Planning Control	September 2005
4.5	Provide dedicated and task specific training given to all new DC staff on the use of CAPs and Anite as part of induction process	Knowledgeable staff in the use of key systems Increase in job satisfaction Fewer errors Increase in efficiency	Training budget Staff time training	Head of Planning Control	November 2006
4.6	Provide refresher courses to all existing users of CAPs and Anite.	Improved staff confidence and morale Fewer errors Increase in efficiency	Training budget Staff time training	Head of Planning Control	Complete by April 2006

Performance Improvement Aim 4 : Planning Employer of Choice

ID	Proposed Action	Performance Benefit /Target	Resource Requirement	Post Responsible	Target Achievement Date
4.7	Produce user manuals for CAPs and Anite systems available for users	Reduced time in seeking support and chasing advice	Officer time	Planning Support Manager	April 2006
4.8	Review all hardware specifications including PC's, scanners and printers and eliminate/update / upgrade where necessary	Quicker response times and processing of software applications	To be investigated. Will be one-off cost for new equipment	Business Manager/Planning Support Manager	June 2006
4.9	Provide regular reports to committee and officers on progress in achieving improvement plan actions	Increased probability of achieving objectives	Officer time – approx 1 day per quarter	Head of Planning Control	December 2005

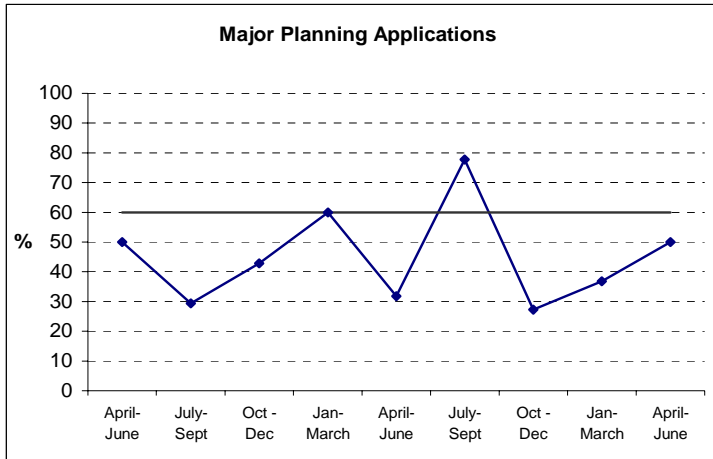
Performance Improvement Aim 5 : Provide a service with credibility and respect

ID	Proposed Action	Performance Benefit	Resource Requirement	Post Responsible	Target Achievement Date
5.1	Produce and implement annual programme of briefing and updating for parish councils, residents associations and amenity groups on latest issues in development control and enforcement policy	Improve knowledge of the planning system and specific issues for Winchester District. Improve relations with outside groups	Officer time to devise and deliver programme. Approx 2 – 4 two hour briefings per annum	Director of Development /Head of Planning Control/Head of Strategic Planning	Commence October 2005
5.2	Improve quality and helpfulness of written correspondence. Reduce use of technical language	Reduced 'repeat' enquiries/complaints; time saving. Improved public perception	Training programme for all staff responding to correspondence	Director of Development	October 2005
5.3	Review and revise all existing in-house publications and standard letters	Ensure consistency, accuracy and ease of use. Improve public understanding of system. Reduce personal enquiries	Significant internal officer time required	Director of Development	September 2006
5.4	Introduction of electronic consultation process for Parish Councils and internal and external consultees	Quicker response time. Cost saving in resources and officer time in processing consultation letters	Will require consultees to be 'online' with adequate technology	Head of Planning Control	December 2005
5.5	Ensure directorate web-site material is up-to-date and contains necessary and useful content. Improve as a communication tool	Better public access to information. Fewer personal enquiries.	Requires appointment of performance management post - 1 scale 4 post	Planning Support Manager	April 2006

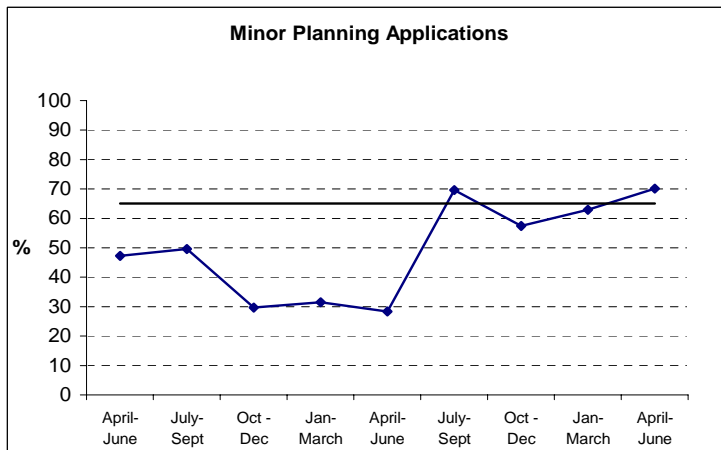
Performance Improvement Aim 5 : Provide a service with credibility and respect

ID	Proposed Action	Performance Benefit	Resource Requirement	Post Responsible	Target Achievement Date
5.6	Improve continuity in the allocation of applications to case-officers so as to maintain	Improved customer service. Reduce delays through greater understanding of all elements of an application. Fewer complaints. Better decision making	Some improvement possible within existing resources. Additional staffing growth needed to fully implement	Director of Development	April 2006
5.7	Review and update all standard conditions	Reduced time spent revising on an ad hoc basis. Greater consistency	Officer time	Head of Planning Control	April 2006

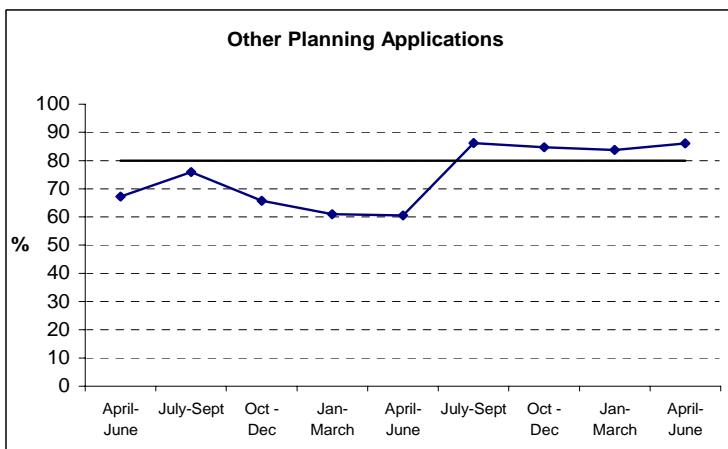
Analysis of the speed of determining planning applications by category 2003-04 to 2005-06



Major	2003/04 Actual %	2004/05 Actual %	2005/06 Actual %
April - June	50.00	31.82	50.00
July - Sept	29.40	77.78	
Oct - Dec	42.90	27.27	
Jan - March	60.00	36.84	
Target 60%			

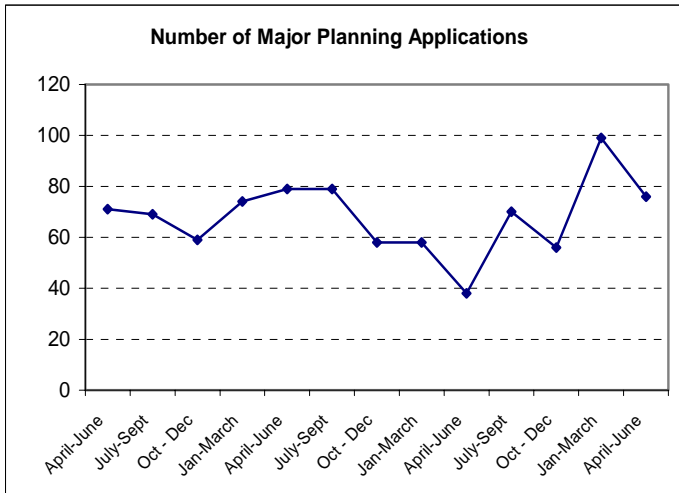


Minor	2003/04 Actual %	2004/05 Actual %	2005/06 Actual %
April - June	47.30	28.37	70.10
July - Sept	49.60	69.57	
Oct - Dec	29.70	57.43	
Jan - March	31.50	62.88	
Target 65%			

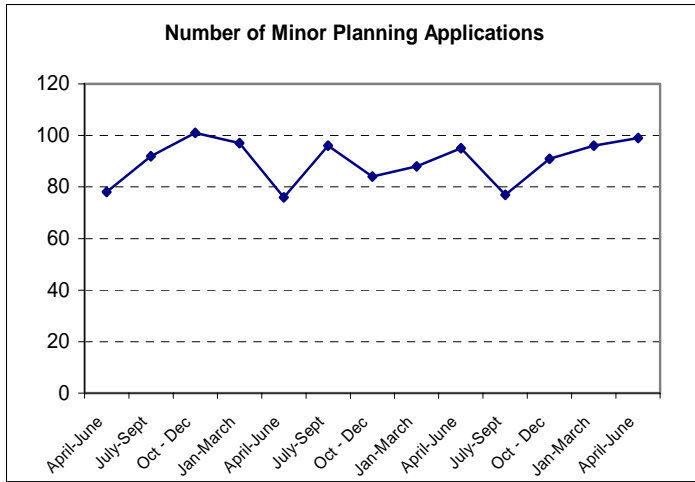


Other	2003/04 Actual %	2004/05 Actual %	2005/06 Actual %
April - June	67.20	60.57	86.10
July - Sept	75.90	86.18	
Oct - Dec	65.80	84.69	
Jan - March	61.00	83.75	
Target 80%			

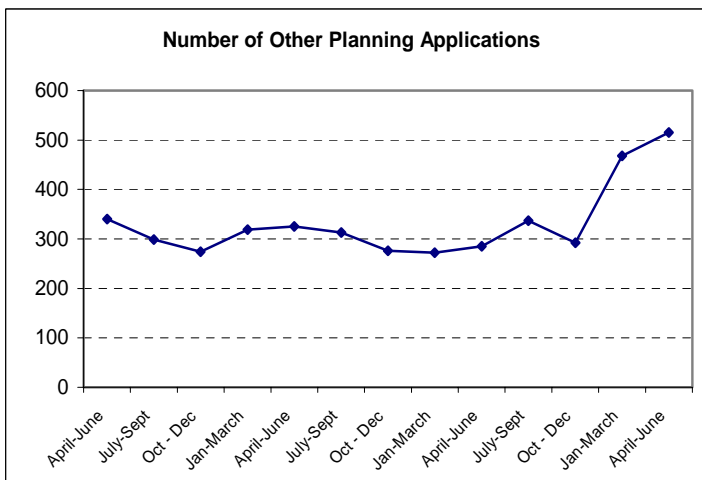
Analysis of the number of planning applications received by category 2002-03 to 2005-06



	2002/03 Actual	2003/04 Actual	2004/05 Actual	2005/06 Actual
Major				
April - June	71	79	38	76
July - Sept	69	79	70	
Oct - Dec	59	58	56	
Jan - March	74	58	99	
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	273	274	263	76



	2002/03 Actual	2003/04 Actual	2004/05 Actual	2005/06 Actual
Minor				
April - June	78	76	95	99
July - Sept	92	96	77	
Oct - Dec	101	84	91	
Jan - March	97	88	96	
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	368	344	359	99



	2002/03 Actual	2003/04 Actual	2004/05 Actual	2005/06 Actual
Other				
April - June	340	325	285	515
July - Sept	299	313	337	
Oct - Dec	274	276	292	
Jan - March	319	272	468	
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	1,232	1,186	1,382	515

