

## **Corporate Committee 14 November 2019**

**Report title:** Rush Common Annual Report

**Wards:** Brixton Hill, Coldharbour, Herne Hill and Tulse Hill

**Portfolio:** Cabinet Member for Planning, Investment and New Homes: Councillor Matthew Bennett

**Report Authorised by:** Strategic Directors, Sustainable Growth and Opportunity: Eleanor Purser and Sara Waller

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### **Report summary**

This report provides an update to the Environment and Community Safety Scrutiny Sub-Committee (ECSSS) commission report and action plan dated March 2010 that investigated the Council's custodian role of Rush Common Land and how the Council could ensure that the Rush Common Act 1806 (the "Act") is enforced. Since that time, several reports have been prepared responding to and reporting on the progression of the action plan. In September 2010 the response of officers to the Rush Common Scrutiny Commission (the "Commission") report and recommendations were considered by Cabinet and Corporate Committee. Corporate Committee resolved to consider an annual report on breaches or potential breaches of the Act and an update on the progress of the action plan.

### **Finance summary**

The cost of producing the report is projected at between £5k to £10k. The costs will be funded from existing general fund budgets.

### **Recommendations**

1. That the update on the action plan (Appendix 1) be noted.
2. That the Rush Common Report 2018-2019 (Appendix 2) be noted.

## **1. CONTEXT**

- 1.1 The Council supports the preservation and improvement of Rush Common land. This is a much valued and historic area of land whose open spaces and character provides a valuable amenity for Brixton Town Centre and the area to the south of it. Most of Rush Common land lies within conservation areas and sits within Coldharbour, Herne Hill, Tulse Hill, and Brixton Hill wards. The Council's aim is to ensure that the open character of Rush Common is maintained and enhanced.
- 1.2 A large proportion of Rush Common land is in Council ownership and is used as public open space or is part of residential amenity space of the St Matthew's Estate and other housing developments. The remainder is in private ownership made up of residential and commercial properties. These have distinctive deep frontages made up of long front gardens and/or forecourts.
- 1.3 The Rush Common Act 1806 (the "Act") was an Enclosure Act that sought to enclose and divide certain common lands. Section 17 of the Act prevented building on the prescribed land. Subsequent legislation amended the Act, and the London County Council (LCC) was given powers in 1947 to take enforcement action against any breach of legislation or to give consent to buildings or erections on the land designated as Rush Common, south of Coldharbour Lane. The power to enforce the Act passed to Lambeth Council in 1988.
- 1.4 Building works or new structures above the surface of the earth require Rush Common Consent. This is the case whether or not planning permission is required. Proposals that require planning permission must be determined on the basis of policies in the Council's Local Development Plan (September 2015), regardless of whether Rush Common Consent is likely to be granted.
- 1.5 The purpose of the Act is to maintain the open character of Rush Common land and is the prime consideration in determining any proposals that come within the sphere of the Act.

### **Adoption of Rush Common Guidance Note and Protocol**

- 1.6 In order to help in achieving this objective, the Council's Corporate Committee approved a Rush Common Policy and Guidance Note in September 2007, following public consultation.
- 1.7 A Summary Leaflet of the Policy and Guidance Note was distributed in March 2008 to all households and businesses affected by Rush Common Guidance and to estate agents active in the area.
- 1.8 The Policy and Guidance Note was emailed to all local ward and other interested councillors; relevant Council departments; the town centre officer; Transport for London; Thames Water; and other public utility providers.
- 1.9 In addition, a Protocol for processing Rush Common Consent applications and considering enforcement matters was agreed by the Corporate Committee in September 2007 and subsequently published in February 2008. The Policy and Guidance Note, Summary Leaflet and the Protocol were uploaded to the Council website in 2008.

### **Establishment of Rush Common Scrutiny Commission**

- 1.10 In January 2009 the ECSSS established a commission to investigate the Council's custodian role of Rush Common land and how the Council could ensure that the Act is enforced. The Commission completed its work in March 2010 and submitted a report of its findings to the ECSSS in July 2010 with recommendations and an action plan. This is included as a background document to this report (see Appendix 3).
- 1.11 The response of officers to the Commission recommendations was considered by Cabinet on 13 September 2010 and Corporate Committee on 23 September 2010. The Corporate Committee

resolved to consider an annual report on the breaches or potential breaches of the Act and an update on the action plan.

1.12 The most recent report was an update to the ECSSS report published on 8 September 2011 and reported to Corporate Committee on 28 September 2011. This included an update on the Scrutiny Commission action plan, presentation of a draft condition survey form and an annual report setting out the status of Rush Common cases including breaches and potential breaches of the Act investigated by the Council's Planning Enforcement Team. The Corporate Committee resolved:

- (1) That the update of the action plan be noted.
- (2) That the approach in the draft condition survey form be agreed.
- (3) That the annual report be noted.

1.13 Following this, an annual update report was presented to Corporate Committee in January 2017, and subsequently in September 2018 in order to provide further updates on the Commission recommendations/action plan and current enforcement matters.

1.14 This report is an annual update to the 2018 Corporate Committee report.

## **2. PROPOSAL AND REASONS**

2.1 The Action Plan has been updated and is included as Appendix 1 to this report. The position on several of the recommendations made by the Commission need further elaboration and these are set out in the report below. Other recommendations were addressed to the satisfaction of the Corporate Committee in September 2011 and require no further officer commentary.

### **Recommendation C (Establishment of a Rush Common 'hub' on Council's website)**

2.2 Recommendation C requires that a Rush Common 'hub' be established on the Council's website providing information on the Common, the Act, a plain English summary of the Act's implications, links to the guidance document and a dedicated e-mail address for residents to either find out more or report potential breaches of the Act.

2.3 In September 2010, Corporate Committee members were advised that a dedicated Rush Common page had been set up on the Council's website, and was accessed from the Planning home page. It included brief explanatory text and an email address to report issues to the Planning Service or make enquiries; the Policy and Guidance Note; the summary leaflet version; the Protocol for enforcement and making applications; and a map of the Rush Common area. This was considered to comply with the Commission's recommendations.

2.4 The Rush Common Protocol – A procedure to guide Rush Common Applications and Enforcement was updated in July 2012 and uploaded to the Council's website.

2.5 In January 2014 the Council rolled out a new look website. The structure was chosen by the Council's web team after testing it with residents and was based on 'customer needs' rather than service needs. This included a reorganisation and streamlining of the content, including the Planning Service pages.

2.6 Rush Common guidance is now contained within the Planning Policy section of the Planning and Building Control site. This brings the website user to a guide on 'Building works on Rush Common' (see link below). It includes brief explanatory text and the following three sections:

1. What works need Rush Common Consent?

2. Rush Common addresses.
3. Further information about Rush Common.

<https://www.lambeth.gov.uk/planning-and-building-control/planning-policy/building-works-on-rush-common-guide>

- 2.7 An email address is provided requesting that users contact the Planning Service before starting any works on Rush Common. In addition, a number of documents are available in Adobe PDF format for downloading. These include the Policy and Guidance Note (February 2008); the summary leaflet version of this; the Protocol for making applications and enforcement (July 2012); a map of the Rush Common area and a copy of the Rush Common Act 1806.
- 2.8 The content is still considered to effectively cover the points in the Commission's recommendations. However, given the passage of time it is considered that there are a number of actions that are required in order to update the Planning website content and make it more legible and fit for purpose. These are detailed in Table 1 below along with a proposed timetable for implementation.
- 2.9 The Council's website also includes an A-Z list of all Key Places within Lambeth, which includes Rush Common (<https://www.lambeth.gov.uk/places>). The relevant Rush Common page provides a cursory description of Rush Common but fails to advise the website user of the Act and the requirement to seek Rush Common Consent for any building works above the surface of the earth. Officers recommend that this webpage is updated to reference the Act and provide a link to the Planning Policy and Building Control webpage for further information. This is also included as an action in Table 1.

| Action   | Target Date | Comment  |
|--|-------------|--|
| Review and update the Rush Common Policy and Guidance Note                                       | April 2020  | The Guidance Note requires minor updates to reflect changes to planning legislation and the Council's Statement of Community Involvement, as well as the adoption in July 2016 of the Local Planning Applications Requirements document.   |
| Update of the draft FAQ document and inclusion in update to Rush Common Policy and Guidance Note | April 2020  | It is noted that Corporate Committee also requested that officers prepare a Frequently Asked Questions document following a suggestion by the Josephine Avenue Group (JAG). This was presented to the September 2011 Corporate Committee meeting.<br><br>Officers suggest that this FAQ is reviewed and updated if required. The agreed document would then be incorporated into the updated Rush Common Policy and Guidance Note. |
| Remove the Protocol document from the website  | Completed   | This protocol document has been removed from the Council's website. It should be noted that this action was completed prior to the Corporate Committee meeting in September 2018.  |
| Update the conservation area boundaries within the Rush Common map on the website                | Completed   | The Rush Common map on the Council's website has been update to reflect the revisions in boundaries to Lambeth Conservation Areas which were revised in 2016. It should be noted that this action was completed prior to the Corporate Committee meeting in September 2018.  |

|   |                             |  |
|---|-----------------------------|--|
| Remove the Rush Common and Guidance advisory leaflet  | Completed                   | The Rush Common and Guidance advisory leaflet has been removed from the Council's website. It should be noted that this action was completed prior to the Corporate Committee meeting in September 2018.   |
| Insert a new section within the existing Planning webpage to provide guidance on the relationship between Rush Common Consent and planning permission | Completed                   | It had been identified that the Planning website didn't expressly state that Rush Common Consent is required even if planning permission is not required (e.g. if works are permitted development or do not constitute development).<br><br>Additional wording was added to the Planning website on 02/09/2018.  |
| Carrying out of a photographic survey of Rush Common properties   | Undertaken in October 2019. | It is proposed that an annual photographic survey be undertaken of all Rush Common land to provide an evidential basis for investigation of potential future infringements of the Rush Common Act 1806. It is important to stress that this would be a monitoring exercise only and would not be an exercise to identify potential infringements. The Planning Enforcement team would continue to investigate and respond to any potential infringements that are notified to them by local residents, amenity/residents groups and other interested stakeholders. |
| Update Rush Common 'Places' page on website   | April 2020                  | The Council website includes an A-Z list of all Key Places within Lambeth, which includes Rush Common. The relevant Rush Common page (see link below) provides a brief description of Rush Common but fails to advise the website user of the Rush Common Act 1806 and the requirement to seek Rush Common Consent for any building works. This will be remedied.  |

*Table 1: List of actions required to update the Council's website*

2.10 All actions will be allocated to and progressed by the Head of Development Management. An update report will be presented to Corporate Committee in November 2020 to advise members on progress.

**Recommendation D (Circulation of current guidance to all residents of Rush Common)**

2.11 Recommendation D required that all residents of Rush Common be sent a copy of the current guidance including a brief one-page summary of their responsibilities in relation to both the Rush Common Act and the Rush Common Conservation Area. This summary should highlight the existence of the Rush Common page on the Council's website.

2.12 The Rush Common Policy and Guidance summary leaflet was distributed to households, businesses and landowners on Rush Common land in March 2008 and included contact details. General enquiries are forwarded to the Planning Service, and alleged breaches are reported to the Planning Enforcement team for investigation.

2.13 Both the current guidance note and summary leaflet are to be updated, and a repeat distribution undertaken as requested by the Corporate Committee in January 2017. This should have been undertaken in September 2018 but has not been actioned to date. The Costs of printing and distributing the documents could be contained within the 2019/20 Planning, Transport and Development Budget.

- 2.14 Corporate Committee also requested that officers prepare a Frequently Asked Questions document following a suggestion by the Josephine Avenue Group (JAG). A draft Frequently Asked Questions (FAQ) document was subsequently attached to the September 2011 Corporate Committee report. This had been prepared by officers and agreed by the Council's legal services.
- 2.15 The FAQ is currently being reviewed and updated. The agreed document will then be incorporated into the updated Rush Common Policy and Guidance Note and will be made available for viewing within the Rush Common section of the Council's website.

### **Recommendations F, H and I (Enforcement)**

- 2.16 Recommendation F required that planning officers maintain an up-to-date monitor of all current and potential breaches and the action being taken or reasons for not taking any action.
- 2.17 The Planning Service's Enforcement team record alleged breaches of planning control on their existing database and this includes complaints relating to breaches of the Act. As with a normal enforcement investigation the case is acknowledged and a complainant can then liaise with the investigating officer for updates etc.
- 2.18 Recommendation H required that Planning officers present to Corporate Committee an annual report on breaches or potential breaches of the Act, the action or otherwise being taken by the Council, and to include the identification of hot-spots or patterns of breaches.
- 2.19 An annual report was prepared and presented to Corporate Committee on September 2018. The report set out the status of Rush Common cases and included breaches and potential breaches of the Act investigated by the Council's Planning Enforcement team between 2017 and 2018. This included details of active, pending and closed cases.
- 2.20 No further report has been presented to Corporate Committee since September 2018. An update report covering the period of 2018-2019 has been prepared by Officers and is included within this report as Appendix 2. This report sets out a list of applications for Rush Common Consent received, and reported potential breaches of the Rush Common Act 1806 lodged/left unresolved since the last annual report to Corporate Committee in September 2018.
- 2.21 The Head of Development Management has taken on responsibility for the preparation and reporting of this annual Corporate Committee report in consultation with Development Management and Planning Enforcement colleagues.
- 2.22 Recommendation I required that relevant ward members be notified where Rush Common consent is requested, or where the Council takes enforcement action in relation to the Rush Common Act. This is reflected in Council protocol, with relevant ward members being notified as and when cases arise. Additional staff training is to be carried out by April 2020 and on an ongoing basis thereafter to ensure that officers within the Planning Service are fully appraised of the Rush Common Act and the adopted protocols for Rush Common applications.

### **Active cases**

There are 12 active Rush Common enforcement cases; seven of which have remained open since the last annual report to Corporate Committee in September 2018 and one of which predates this, and has been open since 19 July 2013 (13/00325/RC). There are five active planning enforcements cases, which were received following the last annual report to Corporate Committee in September 2018.

### **Closed cases**

Two Planning enforcement cases have been closed since the last annual report to corporate committee in September 2018, one of which was received before that committee meeting, and the other following the committee meeting.

### **Recommendation N (Conditions Survey)**

- 2.23 The Commission was of the view that the collation of information on the present state of Rush Common appeared inconsistent and felt that a comprehensive general conditions survey of the state of the land should be carried out and that this would be useful in terms of future applications or notification of breaches of the Rush Common Act.
- 2.24 Recommendation N required that a full and dated conditions survey of Rush Common land be undertaken and the Environment and Community Safety Scrutiny (ECSS) Sub-Committee be consulted on the terms of reference and timetable for the carrying out of the survey.
- 2.25 The ECSSS at its meeting on 8 September 2011 agreed an approach set out in a draft condition survey presented to it, which had been prepared in consultation with the Josephine Avenue Group (JAG) and an officer in the Lambeth Parks team.
- 2.26 The intention was for a survey of non-council managed Rush Common land to be carried out by local groups and residents. Council managed Rush Common land was to be the subject of a separate survey as part of the overall council-wide survey of its open spaces. The survey would be included in the tendering process for a new maintenance contract of open spaces.
- 2.27 The method of collating and recording the collected data, how it was to be held and who would have access rights was never determined. Officers have been unable to find any evidence that this matter was progressed further after the September 2011 Corporate Committee. The lead officer in the Planning Service with responsibility for Rush Common matters left the Council in June 2013 as part of a wider organisational restructuring.
- 2.28 It is officer recommendation that this action no longer be pursued in view of the Council's current financial circumstances and priorities. It is proposed that an annual photographic survey be undertaken of all Rush Common by the Planning Service to provide an evidential basis for investigation of potential future infringements of the Act. It is important to stress that this would be a monitoring exercise only and would not be an exercise to identify potential infringements. Officers would continue to respond to any potential infringements that are notified to them by local residents, amenity/residents groups and other interested stakeholders.
- 2.29 A photographic survey of Rush Common was undertaken in October 2019, this is to be made available for viewing.

### **Applications for Rush Common Consent**

- 2.30 A total of three Rush Common Consent Applications have been received following the last annual report to Corporate Committee in September 2018, one of which has been approved at delegated officer level, and two of which are pending consideration.

The applications pending consideration are:

- 19/03344/RUS – Land On Corner Of St Matthew's Road And Brixton Hill, London - Application for Rush Common approval in respect to replacement of existing metal boundary gates to St Matthew's Road with wooden gates not larger than the existing gates, and erection of new Sweet chestnut cleft post and rail fencing consisting of one bay maximum 1.8m wide on the

right hand side of the Brixton Hill entrance, with two vertical posts and one horizontal rail, and two bays on the left hand side, a maximum of 3.77m wide, consisting of three posts and two horizontal rails. The height across any point to be a maximum of 0.80m above ground at that Brixton Hill entrance, together with the erection of two non-illuminated free-standing signs. – Date Valid: 25/09/2019.

- 19/03741/RUS – Black Cultural Archives, 1 Windrush Square, London, SW2 1EF - Application for Rush Common consent in respect to erection of a memorial Pavilion – Date Valid: 07/10/2019.

### **Resident consultation on Rush Common Consent applications**

2.31 Paragraph 10 of the adopted Rush Common Protocol (July 2012) details the procedure that should be followed in respect of consultation on Rush Common Consent applications.

2.32 It advises that the groups and stakeholders below should be consulted on all applications. Other consultations including local residents, businesses and groups should be carried out where appropriate.

- All ward members;
- The Brixton Society;
- Friends of Rush Common;
- The Josephine Avenue Group;
- Roupell Park Residents and Management Co-operative;
- St Matthew’s Estate Tenants and Residents Association; and,
- Bailey Mews Residents Association.

2.33 All of the above groups are now consulted as standard practice on all Rush Common Consent applications.

2.34 Within the January 2017 Annual Report to Corporate Committee, it was acknowledged that there appeared to have been a lack of understanding amongst officers of the Planning Service of the Adopted Rush Common Protocol. In order to address consultation failings identified in the review of applications received in the period 2011-2016, it was proposed and agreed by the Corporate Committee to carry out the following actions to ensure that all officers in the Planning Service are fully appraised of the Rush Common Act and the adopted protocols for Rush Common applications.

| Action         | Target Date            | Comment  |
|----------------|------------------------|--|
| Staff Training | April 2020<br>On-going | <p>The Planning Service has a high turnover of staff. Measures are required to ensure that all existing staff members and new starters are trained up on Rush Common protocol. This will include all officers in the Central Development Management Area team in which Rush Common land falls, all DM Support officers and all officers in the Planning Enforcement team.</p> <p>An annual briefing will be carried out to update all officers on the contents of the Annual Report when it is published and presented to Corporate Committee.</p> |



|  |            |   |
|--|------------|---|
| Establishment of a Rush Common 'hub' on the staff Intranet     | April 2020 | The Planning Service has a dedicated page on the staff intranet, which hosts resources for the planning and development teams. It is proposed to include a Rush Common procedure note on this page.   |
| Better utilisation of existing IT packages                     | April 2020 | Officers will investigate whether the Planning Service's existing IT systems can be better utilised to identify planning submissions made on Rush Common land. This would ensure that the applicant is contacted and advised of the requirement to seek Rush Common Consent in addition to an application for planning permission.<br><br>A note to the applicant will be added to all planning permissions granted on Rush Common land advising the applicant that Rush Common Consent is also required. |
| Updating of consultation list                                  | Completed  | The consultation list for all Rush Common consent applications has been updated so that all necessary groups and stakeholders are consulted as standard practice. (See paragraph 2.32 for the list of groups and stakeholders consulted).<br><br>It should be noted that this action was completed prior to the Corporate Committee meeting in September 2018.  |
| Drafting of Annual Report and reporting to Corporate Committee | Annually   | Officers will produce an annual report detailing planning permission and Rush Common consent applications and enforcement cases dealt with by the Planning Service in the previous 12 month period. This will be reported to Corporate Committee annually.  |

*Table 2: List of actions to update consultation requirements and process*

### **3. FINANCE**

- 3.1 The projected cost of producing the report is between £5k to £10k
- 3.2 The costs will be funded through existing general fund budgets.

### **4. LEGAL AND DEMOCRACY**

- 4.1 The Council is responsible for the enforcement of the Act under the London County Council (General Powers) Act 1947. It is important to note that the Act is distinct and separate from planning legislation and the two should not be confused. Under planning legislation the Council has a general discretion to take enforcement action against unlawful development where considered expedient, and is the responsibility of the Planning Service.
- 4.2 Building or other works carried out without Rush Common Consent are immediately liable to injunctive action by the Council, where it is considered appropriate to pursue.
- 4.3 Injunctive relief is the application to the High Court for an order preventing a breach of the Act or, if it has already happened ordering the removal of the breach. For example, if a building were erected on Rush Common without consent, the court could order an injunction requiring its demolition and removal. If an injunction is not complied with, the person to whom it is addressed will be in contempt of court and liable to a fine or imprisonment (at the court's discretion there is no maximum).

- 4.4 There is no time limit for enforcement action specified within the 1947 LCC (General Powers) Act. However, the Council has been advised that legal action should be considered within the time limits in the Limitation Act 1980. Any such action should be taken within 6 years of the building or erection being built or constructed. In order for action to be taken in respect of an existing breach, the Council would need to possess substantive evidence that the breach had occurred within six years of the date of the injunctive action.
- 4.5 Where there is a breach of the Act, in a case where consent would not be granted, the Council can apply to the High Court for an injunction requiring the removal of the structure.
- 4.6 Injunctions are a discretionary remedy and residents may raise defences that the Council is being unreasonable in deciding to demolish a building and/or alternatively that it is interfering with the owner's property rights which may be a breach of their human rights. It is important therefore that any action that the Council takes is proportionate to the breach. Each enforcement case will have been considered on its own merits.
- 4.7 There were no further comments from Democratic Services.

## **5. CONSULTATION AND CO-PRODUCTION**

- 5.1 The Scrutiny Commission carried out consultation as part of its fact finding process when drafting its March 2010 report.
- 5.2 No resident engagement has been carried out in the drafting of this update report. However, the report and minutes of the Corporate Committee meeting will be sent to the bodies detailed in paragraph 2.32.

## **6. RISK MANAGEMENT**

- 6.1 None.

## **7. EQUALITIES IMPACT ASSESSMENT**

- 7.1 None.

## **8. COMMUNITY SAFETY**

- 8.1 Section 17 of the Crime and Disorder Act 1998 imposes a duty on the Council to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and the misuse of drugs, alcohol and other substances in its area.
- 8.2 There may be implications in respect of community safety if restrictions are imposed or actions are required such as removing fencing that could compromise residents' safety. This would need to be carefully monitored in conjunctions with the community safety team.
- 8.3 It is notable to add that, in relation to any potential noise issues that may arise, those these would not fall under the remit of planning - the Community Safety Team (under the Control of Pollution Act

1974) can provide more immediate action outside of the 'normal functions' of planning management. Further details on this can be obtained using the following link:

<https://www.lambeth.gov.uk/community-safety-and-anti-social-behaviour/noise-and-antisocial-behaviour/report-a-noise-nuisance>.

## 9. ORGANISATIONAL IMPLICATIONS

### 9.1 Environmental

None.

### 9.2 Staffing and accommodation

All report writing and actions carried out to date and those identified have been within existing resources. This has been carried out by the Central Area Team officers within the Planning Service who have responsibility for the area within which Rush Common land lies.

There is no capacity to fund further initiatives in relation to Rush Common given the Council's current financial circumstances and priorities.

### 9.3 Procurement

None.

### 9.4 Health

None.

## 10. TIMETABLE FOR IMPLEMENTATION

| Task  | Target Date   |
|---|---|
| Review and update the Rush Common Policy and Guidance Note                        | April 2020  |
| Remove the Protocol document from the website                                     | Completed   |
| Update the conservation area boundaries within the Rush Common map on the website | Completed   |
| Remove the Rush Common and Guidance advisory leaflet                              | Completed   |
| Carrying out of a photographic survey of Rush Common properties                   | Annual photographic survey undertaken October 2019, to be undertaken thereafter annually. |
| Staff Training  | On-going  |
| Establishment of a Rush Common 'hub' on the staff Intranet                        | April 2020  |

| <b>Audit trail</b>                                      |   |                  |                      |                          |
|---|---|------------------|----------------------|--------------------------|
| <b>Consultation</b>                                     |   |                  |                      |                          |
| <b>Name/Position</b>                                    | <b>Lambeth directorate/department or partner</b>          | <b>Date Sent</b> | <b>Date Received</b> | <b>Comments in para:</b> |
| Councillor Matthew Bennett                              | Cabinet Member for Planning, Investment and New Homes     | 27.10.2019       | 04.11.2019           |                          |
| Eleanor Purser and Sara Waller                          | Strategic Director for Sustainable Growth and Opportunity | 27.10.2019       | 01.11.2019           |                          |
| Alison McKane, Director                                 | Legal and Governance                                      | 27.10.2019       | 05.11.2019           |                          |
| Peter Flockhart, Senior Planning Lawyer                 | Legal and Governance                                      | 27.10.2019       | 28.10.2019           |                          |
| Matthew Gaynor AD Capital Finance                       | Finance and Investment                                    | 28.10.2019       | 29.10.2019           |                          |
| David Rose, Democratic Services                         | Legal and Governance                                      | 27.10.2019       | 28.10.2019           |                          |
| Catherine Neal, Business and Programme Delivery Manager | Development, Planning and Housing Growth                  | 27.10.2019       | 29.10.2019           |                          |

| <b>Report history</b>                          |  |
|--|--|
| <b>Original discussion with Cabinet Member</b> | N/A  |
| <b>Report deadline</b>                         | 01.11.2019   |
| <b>Date final report sent</b>                  | 05.11.2019   |
| <b>Key decision report</b>                     | No   |
| <b>Date first appeared on forward plan</b>     | N/A  |
| <b>Key decision reasons</b>                    | N/A  |
| <b>Background information</b>                  | <ul style="list-style-type: none"> <li>• <a href="#">Rush Common Act 1806</a></li> <li>• <a href="#">Rush Common Policy and Guidance Note (February 2008)</a></li> <li>• <a href="#">Protocol for Rush Common Applications and Enforcement (July 2012)</a></li> <li>• <a href="#">Rush Common Commission Report March 2010</a></li> <li>• <a href="#">Lambeth Local Plan (2015)</a></li> </ul> |
| <b>Appendices</b>                              | <ul style="list-style-type: none"> <li>• Appendix 1: Update of the Rush Common Commission Action Plan November 2019</li> <li>• Appendix 2: Rush Common Report 2018-19</li> <li>• Appendix 3: Rush Common Commission March 2010</li> </ul>  |