

HAILSHAM TOWN COUNCIL

ASSETS MANAGEMENT COMMITTEE

AGENDA

Notice is given of a meeting of the Assets Management Committee, to be held at the Fleur-de-Lys Council Chambers/Meeting Rooms, Market Street, Hailsham, on

Wednesday 21st August 2019 at 7.00 p.m.

1. <u>Public Forum</u>

A period of not more than 15 minutes will be assigned for the purpose of permitting members of the public to address the assembly or ask questions on matters relevant to responsibilities under the direction of this committee, at the discretion of the Chairman.

2. Apologies for Absence

To receive apologies for absence of appointed members.

3. Declarations of Interest

To receive notice of declarations of personal or prejudicial interests in respect of items on this agenda.

4. Minutes of Previous Meeting – Assets Management Committee

- 4.1 To resolve that the Minutes of the Meeting of the Assets Management Committee held on 31st July 2019 (Ref: AMC/19/2/16-30), as printed and circulated, may be taken as read, confirmed as a correct record, and signed by the Chairman.
- 4.2 To receive an update about progress of resolutions from the last meeting of the Assets Management Committee on 31st July 2019

5. <u>Community Infrastructure Levy Projects</u>

To consider any potential Community Infrastructure Levy projects

6. Common Pond

To consider signage for the Pond

7. Our Hailsham Magazine

To consider the future content of Our Hailsham Magazine

8. <u>Confidential Business</u>

To resolve that due to the special and confidential nature of the business about to be transacted, and possible disclosure of personal or legal information not in the public interest at the present time, the following items of business be transacted following the temporary exclusion of members of the Public and Press, in accordance with the Council's Standing Orders No. 1E.

9. Community Land Trust

The reason for exclusion is:

(b) terms of tenders, and proposals, and counter-proposals in negotiations for contracts

9. Community Land Trust

To further consider a proposal from Hailsham Community Land Trust

John Harrison, Town Clerk

Jun 4-

Committee Membership:

Cllr C. Bryant

Cllr B. Granville

Cllr R. Grocock

Cllr K. Hinton

Cllr P. Holbrook

Cllr M. Laxton

Cllr T. Powis

Cllr C. Tasane

Substitutes:

Cllr N. Coltman

Cllr D. Cottingham

Cllr B. Holbrook

Cllr A. O'Rawe

Cllr J. Puttick

Report to: Assets Management Committee

Date: 21st August 2019

By: John Harrison, Town Clerk

Title of report: Community infrastructure Levy Projects

PURPOSE:

To consider any potential Community Infrastructure Levy Projects

BACKGROUND

The Town Council's Strategy Committee has been considering the best way to approach the development of a 'Community Infrastructure Levy Policy' - that is how to decide what infrastructure projects should the council's allocation of CIL payments be used for.

Strategy Committee Minutes 08th July 2019 (Minute Ref STC/19/2/01-11)

Community Infrastructure Levy Policy

Mr Harrison explained the background to this agenda item: The committee had asked him to investigate what other councils implement as a 'CIL Policy' and to draft an appropriate policy for Hailsham TC. Research revealed that the common approach to this has been to draw up an infrastructure list to be prioritised by the council.

Background information and guidelines on CIL allocation was presented from WDC, National Government, NALC and also East Devon District Council (as an example of sensible and thorough guidelines).

Aspects of the advice and guidelines discussed were:

- Town councils should be clear that there are ongoing operational costs to any infrastructure developments, for which CIL cannot be used. Any capital expenditure requires revenue to maintain and operate.
- To be wary of 'short-term quick wins' and be mindful of longer-term priorities for the town.
- The expectation that parish and town councils would work with their partner authorities to ensure their listed priorities are in line with the wider infrastructure needs of the parish.

Approaches to CIL allocation suggested:

Most councils were writing an infrastructure list.

- Potentially implementing a system of 'bidding' for CIL by committees (with a pro-forma presented)
- The possibility of ring-fencing an amount of CIL money for external organisations/community groups to bid for?
- The extent of public consultation on CIL allocation.

The committee agreed that certain key documents are already in place to guide the allocation of CIL projects. The Neighbourhood Plan is the key document as is the council's Strategic Plan. To a lesser extent also the 'Hailsham the Way Forward' plan although its age meant it less relevant.

It was also felt that because the council already had in place these documents and a robust committee structure, the key elements for a good CIL allocation process are already in place.

The committee noted it had already been resolved that 25% of CIL be used for major infrastructure and therefore it was necessary to have an ongoing dialogue with WDC as to what they consider to be major infrastructure

It was agreed the most complete approach therefore would be to ask the key council committees to make list of priorities while ensuring they are in line with the council's priorities as stated in the key documents.

RESOLVED to ask the Neighbourhood Plan, Assets Management and Communities Committees to suggest three projects each for CIL funding, ensuring they are in line with identified priorities in the councils key plan documents, to be considered for the new year and to be added to a CIL list that the council would then look into prioritising.

The committee then queried the approach if, in the meantime a committee or councillor requested CIL funding for project. Whilst this could not be prevented if the council so resolved, it was hoped that council would refer to this agreed policy in the first instance.

Community Infrastructure Levy – Background Information: Attached as appendix to this report.

- NALC Guidelines on CIL
- WDC Advice note to Town and Parish Councils

FINANCIAL IMPLICATIONS

CIL payments received to date

| 11/04/2017 | £2,341.43 |
|------------|-------------|
| 16/10/2017 | £7,786.45 |
| 23/04/2018 | £315,114.64 |
| 15/10/2018 | £4,260.90 |
| 02/04/2019 | £109,956.81 |
| | |
| Total | £439,460.23 |

CONSIDERATIONS

- The Assets Management Committees is asked to suggest three projects for CIL funding, ensuring they are in line with identified priorities in the councils key plan documents, to be considered for the new year and to be added to a CIL list that the council would then look into prioritising.
- The Assets Management Committee is asked to consider its approach to determining its three projects (i.e. whether through ordinary meetings, a sub-committee, an extraordinary meeting of the committee etc).

The 'key plan documents' identified by the Strategy Committee are:

- 1. Hailsham Neighbourhood Plan
- 2. Hailsham Town Council Strategic Plan
- 3. (and to a lesser extent) Hailsham the Way forward.

These have not been attached to this report due to their length and size, but are available at the following links:

- 1. https://www.hailsham-tc.gov.uk/wp-content/uploads/2019/04/1.-2019-Hailsham-NDP-Submission-version-Low-Res.pdf
- 2. https://www.hailsham-tc.gov.uk/wp-content/uploads/2018/04/Strategic-Plan-April-2018.pdf
- 3. http://www.hailshamforward.co.uk/downloads/thewayforward.pdf





A Guide to the Community Infrastructure Levy (CIL) for Parish and Town Councils

Planning Futures has been commissioned by the National Association of Local Councils' (NALC) Legal team to prepare this briefing note on how the Community Infrastructure Levy or CIL, can help your Town or Parish Council (TPC) to deliver and support local infrastructure provision.

What is CIL?

CIL is a charge on development that came into force in 2010 (and runs in tandem with s.106 contributions). The purpose of the CIL is to fund infrastructure to support local development.

Local Administrations can choose whether or not to charge CIL within their Borough/District and the levy is usually collected by the Local Planning Authority who are known as the "Charging Authorities" (CA).

The rate of CIL is set by the CA after consulting with their communities and developers (and is tested by Independent Examination).

The Town and Parish Council Share

TPCs are entitled to a "Neighbourhood proportion" (NP) (sometimes called the "Meaningful Proportion") of the CIL monies received by the CA.

The amount you receive depends on whether or not you have an adopted Neighbourhood Plan in place.

No Neighbourhood Plan – You will receive 15% (capped at £100 per existing council tax dwelling in the Council's area).

Adopted Neighbourhood Plan in your area (or a development that has been granted permission by a Neighbourhood Development order)? – You will receive 25% of CIL receipts (uncapped).²

² Where there is no TPC in an area, the CA will retain 15% as the NP and will consult with local communities as to spending priorities.



¹ In London, the boroughs collect the levy on behalf of the Mayor.

What can you spend it on?

CIL monies can be used to support the development of the local area to fund:

- (a) the provision, improvement, replacement, operation or maintenance of infrastructure; or
- (b) anything else that is concerned with addressing the demands that development places on an area³.

"Infrastructure" includes physical, social and green infrastructure e.g. Highways; cycleways; education facilities; sports and community halls; parks and play areas.

CIL monies cannot be used for everyday TPC expenditure or for spending on items or services which fall outside the TPC's remit (whether that be by statute or Power of Competence⁴).

Examples of how CIL monies have been spent include:

- Supporting a Town Bus service (Henley on Thames Town Council)
- Ultrafast fibre Broadband (Waterstock Parish Council)
- Installing village gates on a main road verge to slow down traffic (Bix and Assendon Parish Council)

Deciding your spending priorities

You should consult with your local community to create your list of local priorities.

To ensure that any consultation is inclusive and meaningful, and that all groups can engage with the CIL process, you should focus on ways of reaching out to all members of the community (particularly those who are less vocal or more vulnerable). TPC newsletters and websites/social media platforms are a useful resource for this, as are community engagement events.

CIL can be used to shape the future of your local area.

By engaging early with your CA, you can coordinate spending to leverage your CIL monies to maximum effect. For instance, you may wish to contribute to larger infrastructure projects to be undertaken by the District or County Council, which will benefit your area in the long-term.

Case Study:

Wokingham Town Council worked with their CA to complete a £4.2million partnership project to refurbish the Market Place. The Town Council used their current and projected CIL monies (including some borrowing against projected CIL income) to contribute to a 50:50 basis to the project.

⁴ Localism Act 2011 Part 1



³ The 2010 Regs 59C

Whilst CIL is often thought of as a fund to support planned development – you may also wish to invest your CIL monies in infrastructure that will incentivise future development.

Putting together an Infrastructure Investment/Delivery Plan (IP) listing the priorities, will provide an evidence base for spending decisions, transparency for local communities and will help you to give the CAs a better understanding of your community priorities.

Spending deadline

The CA will pay out CIL monies collected to your TPC at regular intervals.

The monies should be spent within 5 years of receipt. If they are not, or they are used inappropriately, then the CA can recover the monies.

Reporting requirements

You must prepare a report for any financial year in which you receive CIL receipts⁵.

For that year, the report should include details of:

- total CIL receipts;
- total CIL expenditure;
- a summary of what the CIL was spent on;
- Details of any notice served by the CA for failure to use CIL monies within the required 5 year period or appropriately;
- the total amount of receipts retained at the end of the financial year (from that year and previous years).

These reports can be combined with other reports already produced by your TPC.

The report should be published on your website (or on the or the CA's website if you do not have one).

A copy of the report should be sent to the CA (from which you received the CIL monies) no later than 31st December following the relevant financial year, unless the report will be published on the CA's website.

<u>Note:</u> This is a general briefing note on the operation of CIL for TPCs who are advised to obtain independent legal advice on matters that can lawfully be funded from CIL receipts (particularly if they have previously had Town/Parish precept funding).

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⁵ The 2010 Regs 62A



COMMUNITY INFRASTRUCTURE LEVY (CIL)

GUIDANCE FOR TOWN AND PARISH COUNCILS

What is the Community Infrastructure Levy (CIL)

- Wealden District Council (WDC) adopted its CIL Charging Schedule on 1st November 2015 and began implementing CIL on 1st April 2016. From this date most new development has been liable to pay CIL.
- The amount of CIL payable is determined by the Gross Internal Area (GIA) of the development and the applicable CIL rate/s.
- There is also the ability to offset existing floorspace on change of use and demolition of existing buildings, subject to meeting certain criteria.
- The CIL is collected from development in order to pay for the infrastructure that is, or will be, needed to support new development across the District.
- The CIL does not replace previous s.106 contributions which are still used to cover on site infrastructure and affordable housing.
- However changes in s.106 legislation mean that many infrastructure needs previously covered by s.106 could now be funded via CIL.

What are the WDC CIL Rates?

The WDC CIL rates are set out in the CIL Charging Schedule 2015 as follows:

| Development | CIL Charge (£ per sq m) |
|---|----------------------------|
| Residential (higher band)* | £200 |
| Residential (lower band)* | £150 |
| Retail – wholly or mainly convenience | £100 |
| Retail – wholly or mainly comparison | £20 |
| Standard Charge (applies to all development not separately defined) | £0 |

^{*}Please refer to figure 1 in the Charging Schedule for the map showing the higher and lower areas.

How is CIL calculated?

- The Wealden CIL Charging Schedule 2015 sets out the charge per square metre that will apply to each category of new development where new floorspace is being created.
- In certain circumstances CIL may also be charged where planning permission is granted to change the use of existing floorspace.

• The standard charge of £0 per sq m will apply to all new floorspace created unless a different rate is set out in the charging schedule.

When is CIL payable?

- The CIL Demand Notice (the invoice) is issued on commencement of development.
- The amount of time given for payment to be paid and the provision of payment by instalments is dependent on the chargeable amount and can be further categorised where phasing has been permitted.
- A copy of the District Council CIL Instalment Policy can be found in the linked documents section of the CIL webpage – as detailed at the end of this note.

What is the Town/Parish Council 'Meaningful Proportion'?

- Under the requirements of the Community Infrastructure Levy Regulations 2010 (as amended), 15% of the CIL collected as a result of development in a given parish area will be passed to the relevant Town/Parish Council – this is more commonly known as the 'meaningful proportion'.
- Payments will be capped to £100 per council tax dwelling per year, for example, a Town/Parish with 500 dwellings cannot receive more than £50,000 of CIL receipts per year.
- In areas with no Town/Parish Council, the 15% of CIL must be used by the charging authority to support the development of the relevant area.
- Areas with an adopted Neighbourhood Development Plan the amount to be passed to the Town/Parish Council will be 25% with no cap.

How and by when must the 'Meaningful Proportion' be spent by the Town/Parish Council?

- The CIL Regulations 2010 (as amended) require the 'meaningful proportion' to be used to support the development of the local area by funding:
 - 1. The provision, improvement, replacement, operation or maintenance of infrastructure; or
 - 2. Anything else that is concerned with addressing the demands that development places on an area
- This provides Town/Parish Councils with a much more flexible approach for spending their CIL receipts in comparison to the powers of District Council.
- Such wider spending powers for the Town/Parish Council allow the local community to decide what they need to help mitigate the impacts of development in their area.
- This may be for a local project, or the Town/Parish may decide to contribute their proportion of the funding to the more strategic projects which are being supported by the District Council, such as an

education expansion project or road scheme that will support their locality – as noted above, the CIL receipts are now needed to deliver many infrastructure items previously funded under s106 and, as such, Town/Parish Councils will have important and difficult decisions to make to prioritise their infrastructure delivery.

- Any spend of CIL funding must fit within the usual powers of the Town/Parish Council and their Powers of Competence.
- Where the infrastructure to be supported is not permissible due to the responsibilities of the Town/Parish Council then this may still happen by agreeing for the money to remain / be passed back to the District Council for them to have spent in accordance with the wishes of the local community.
- Decisions on the expenditure of the 'meaningful proportion' funds are at the Town/Parish Council's discretion, provided that it is in accordance with the CIL regulations.
- If a Town/Parish Council has failed to spend CIL funds transferred to them within a period of 5 years from the date of initial receipt, or has not applied the funds in accordance with the Regulations, then the District Council can serve a notice on the Town/Parish Council requiring it to repay some or all of the receipts that had been transferred to them.

When will the Town/Parish Council receive a payment of the 'Meaningful Proportion'?

 The District Council will normally make payment in respect of CIL it receives from 1 April to 30 September to the Town/Parish Council by 28 October of that financial year, and pay the CIL received from 1 October to 31 March by 28 April of the following financial year.

What are the reporting requirements for the Town/Parish Council?

- To ensure transparency Town/Parish Councils must publish each year (the financial year) their:
 - total CIL receipts;
 - total expenditure;
 - o a summary of what the CIL was spent on; and
 - the total amount of receipts retained at the end of the reported year from that year and previous years.

- Reports can be combined with other reports already produced by Parish/Town Councils and should be placed on their website and a copy of the report is required to be sent to the District Council.
- Where a Town/Parish does not have a website the District Council can, upon request, publish this information on its website on the Town/Parish Council's behalf.
- The CIL report must be published and sent to the District Council no later than 31st December following the reported year (the financial year).

• Town and Parish Councils may use the reporting template provided by Wealden District Council

Further Details

More information about CIL can be found on the Wealden District Council Website:

http://www.wealden.gov.uk/cil

Please contact the Planning Policy Team if you have any specific questions.

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Date Adopted: 26 November 2014

1. INTRODUCTION

- 1.1 This protocol has been drawn up to provide clear and consistent guidance to Council Members and Officers on how the Council communicates effectively and impartially with the public via the press/media.
- 1.2 This Media Relations Protocol supports the work of the Council to increase public awareness of the services provided by the Council and the functions it performs; to allow local people to have a real and informed say about issues that affect them; to explain to electors and council tax payers the reasons for particular policies and priorities; and in general to improve local accountability.
- 1.3 For the purpose of the Media Relations Protocol, the term media relations refers to press/news/media releases, press statements and press/media enquiries.
- 1.4 News releases are one of the key techniques for publicising Council activities, decisions and achievements.
- 1.5 All media relations activity should reflect the principles of confidentiality, Data Protection, Freedom of Information and copyright, in addition to the Code of Recommended Practice on Local Authority Publicity 2011, with reference to the Local Government Acts 1986 and 1988.

- 1.6 The overriding principle of this policy is that all elements of the media will be treated equally.
- 1.7 It is important that all Members and Officers who might come into contact with the media understand the implications of the Media Relations Protocol. The Council's code explains this within a local context. Without proper co-ordination it would be difficult to ensure that the news releases and public communication messages issued by the Council are consistent and accurate.

2. RESPONDING TO MEDIA ENQUIRIES

- 2.1 The Council respects the press/media's role in delivering information to the public and responses will be given in recognition of deadlines, which are crucial to effective media relations.
- 2.2 The press/media are very important in conveying information to the community, so the Council must maintain positive, constructive media relations at all times.
- 2.3 The media work on behalf of the local community to hold the Council to account for its policies and actions and it is therefore important that they have access to Officers and Members and to background information to help them in this role.
- 2.4 Requests for interviews, information or photographs from the press/media should be referred initially to the Public Information/Communications Officer and Town Clerk (or Deputy Town Clerk in his absence). Any response will be collated in conjunction with the Town Clerk (or Deputy Town Clerk) and Public Information/Communications Officer.
- 2.5 Where possible, responses will be given by the relevant Committee Chairman (or in their absence, the Committee Vice-Chairman).
- 2.6 All responses will be signed off/approved by the Town Clerk (or in his absence, the Deputy Town Clerk) prior to transmission to the press/media.
- 2.7 The Council recognises that Members have private lives and may be approached directly by the press/media in relation to their roles outside of the Council. In this instance, Members should make it clear they are not commenting as an elected Member or on behalf of the Council and that the views given are their own and not necessarily those of the Council or its subsidiary structures.
- 2.8 Requests to take photographs of Members or Officers in relation to Council business must be agreed by the individual and in the case of staff, by the Town Clerk (or in his absence, the Deputy Town Clerk).
- 2.9 There is no out-of-hours media relations service, although Members can be contacted outside of normal office hours as their contact details are available in the public domain.

2.10 The Council is open and accountable and should always explain if there is a reason why it cannot answer a specific enquiry from the press/media.

3. NEWS RELEASES: GENERAL PRINCIPLES

- 3.1 As well as responding to requests from the press/media, the Council will proactively issue news releases and distribute them to the relevant press/media.
- 3.2 News releases will be fair, honest, informed, balanced, accurate and non-party political.
- 3.3 News releases must "not be a prejudiced, unreasoning or political attack on the policies or proposals in question or on those putting them forward." They must not criticise another part of the Council or other local authorities or organisations, but may question, query or scrutinise.
- 3.4 News releases issued in the name of the Council will not publicise the activities of individual Members or persuade the general public to hold a particular view, political or otherwise. News releases must reflect the Council's stated policy and not views of individual members or groups of members.
- 3.5 Officers and Members have a responsibility to identify newsworthy items and proactively seek opportunities where it may be beneficial to issue a news release.

4. NEWS RELEASES: PROACTIVE PUBLIC RELATIONS

- 4.1 The Public Information/Communications Officer is encouraged to think about the activities and services provided by the Council, how the Council can achieve effective publicity and to proactively promote news stories. This relates to possible stories that can be used in newsletter articles and features, as well as news releases.
- 4.2 The Town Council may issue proactive news releases in a range of circumstances and in conjunction with other agencies. For example:
 - To inform about a decision by the Council or one of its Committees
 - To publicise changes to one or more Council services
 - To promote a Council or community event
 - To publicise a campaign or raise awareness of a topic of local interest
 - To pass on good news for Hailsham
 - To publicise the Council's good practice
 - To raise Hailsham's profile in support of the Council's core objectives
 - To inform announce an appointment on the Council or an upcoming election
 - To also promote the activities of the Town Mayor, including civic engagements
- 4.3 The content of proactive news releases is drawn up in consultation with relevant officers to ensure factual accuracy.

5. NEWS RELEASES: REQUESTS FOR PUBLICITY FROM MEMBERS

- 5.1 Requests by Members for news releases to be drafted and issued can be made at any time to help the Council maintain a strong identity with local residents and to communicate good stories.
- 5.2 Occasionally, Members ask for news releases to be drafted and issued to publicise issues or events in the ward or relevant to the Committee in which they sit, which accord with council policy. In such circumstances, requests for news releases for planned campaigns and projects must be passed on by the said Member to the relevant Council Committee for approval at the next formal meeting of that Committee.
- 5.3 Once a request for the writing and issuing of a news release has been presented to and approved by the relevant Committee, the Public Information/Communications Officer (or other Officer in his absence) will begin drafting the news release as early as possible.

6. NEWS RELEASES: DRAFTING AND APPROVAL

- 6.1 The content of all news releases should be shared with and approved by the Town Clerk (or in his absence, the Deputy Town Clerk) prior to distribution to the local press and media.
- 6.2 News release drafts should also be sent to the appropriate Committee Chairman with responsibility for the issue concerned for approval prior to distribution to the press/media (or in their absence, the Committee Vice-Chairman) and any other Members being quoted. This will give those Members time to digest the issue prior to any media enquiry.
- 6.3 Preparation and approval of Council news releases is a priority for Officers and Members. Where possible, news releases should be drafted and circulated for approval in advance of a newsworthy event, activity or Committee meeting.
- 6.4 News stories and announcements are often time-sensitive, with many needing to be sent out promptly to meet media deadlines. In these instances, if the Public Information/Communications Officer has attempted contacting any Member quoted in and/or who Chairs the Committee relevant to the subject nature of the news release for approval, but a response hasn't been received, the quote will be attributed to the Town Clerk and the news release will be issued to the press/media as approved by the Town Clerk without further delay.

7. NEWS RELEASES: REGULATIONS DURING ELECTION PERIODS

7.1 In the period between the notice of an election and the election itself (purdah), the Council is subject to rules which impact on how it can communicate with the public. Prior to local elections, news releases will not contain a quote from any Member. In

- these circumstances, where a quote is required, the relevant Officer may be quoted. Once a general election is declared a comparable embargo applies.
- 7.2 During an election period, Council news releases should not deal with controversial issues or report views, proposals or recommendations in a way that identifies them with individual members or groups of members. This ensures that no individual Member gains an unfair advantage by appearing in official publicity.

8. NEWS RELEASES: DISTRIBUTION AND PUBLICATION

- 8.1 News releases will be transmitted by email to the relevant press/media outlets after approval by the Town Clerk (or in his absence the Deputy Town Clerk) and, if applicable, the appropriate Committee Chairman (or in their absence, the Committee Vice-Chairman) with responsibility for the issue concerned, in addition to all other Members and other people quoted.
- 8.2 News releases will also be posted on the Council website and social media as early as possible after transmission to the press/media.
- 8.3 Members with particular responsibilities for or interest in subject areas will be canvassed annually or on a pre-determined regular basis for their requirements in respect of the public communications (news releases) they wish to receive as a matter of routine.
- 8.4 All Members will receive a copy of the approved news release(s) from the Town Clerk by email or in hard copy format within four working days after transmission to the press/media.

9. NEWS RELEASES: NEGATIVE ISSUES AND INNACURATE REPORTING

- 9.1 From time to time the Council has to respond to negative issues. It is important that these situations are managed carefully so as to limit the potential for unconstructive, harmful or negative publicity. Members and Officers must alert the Town Clerk as soon as a potentially negative issue which may attract media interest comes to light. They should not wait until contact is made by the media.
- 9.2 Officers must be prepared to work together with Members to prepare holding statements, news releases or other information and carry out research even if no press/media have contacted the Council about an issue.
- 9.3 Should the press/media publish or broadcast something inaccurate about the Council or its services, a quick decision needs to be taken on any action necessary to correct it. The issue should be discussed with the Town Clerk to decide what action is appropriate. This could be a personal letter to the editor(s), news release, discussion with the relevant journalist or in mitigating circumstances legal advice.

9.4 It should be noted that in the case of minor inaccuracies which have little or no impact on the message being conveyed, it can sometimes be counter-productive to object or make a complaint. Each case must of course be judged individually. Occasionally the Council will make errors and get something wrong and in these cases damage limitation is important.

10. NEWS RELEASES: EMBARGOES

10.1 Embargoed news releases are issued when the Council doesn't want the details published before a particular event. This can be done by simply including the word 'embargo' on the news release and the inclusion of the phrase "Not for publication prior to XX/XX/XXXXX." The majority of journalists and media representatives will respect this - unless a request is considered unreasonable.