

CHESHIRE EAST COUNCIL

Cabinet Member for Children and Family Services

Date of Meeting: 17th December 2012
Report of: Lorraine Butcher, Strategic Director Children, Families and Adults
Subject/Title: Proposed Expansion of Wheelock Primary
Portfolio Holder: Councillor Rachel Bailey

1.0 Report Summary

- 1.1 As the Strategic Commissioner of School Places, Cheshire East Council has a statutory duty to commission sufficient school places for children resident in its area.
- 1.2 Pupil forecasts indicate a shortfall in the number of primary school places due to changing populations and increasing demand in some areas of the Borough resulting in a forecast of only 8 spaces across all year groups and all primary schools by 2017. For the Sandbach area, forecasts indicate a shortfall of 144 places for the same period across the six Sandbach primary schools and 151 shortfall including the 2 primary schools in nearby Haslington.
- 1.3 In response to these pupil forecasts a review of provision has been undertaken. This has resulted in a proposal to increase the capacity at Wheelock Primary from 210 to 315 pupil places (from 1 form of entry to 1.5 forms of entry) to meet the increasing demand in this area and to ensure a level of operational surplus; which is a level of spare capacity intended to accommodate reasonable journey times to school, some degree of parental choice, and flexibility to allow for mid-year entrants.

	Unused (Surplus) Places (January 2012 School Census Forecasts)									
	13/14		14/15		15/16		16/17		17/18	
Sandbach (8 Schools inc Haslington)	31	2%	-28	-1%	-68	-4%	-119	-6%	-151	-8%
Sandbach (6 schools)	4	0%	-52	-4%	-79	-6%	-119	-9%	-144	-11%
All CE Primary Schools	1121	4%	752	3%	452	2%	208	1%	8	0%

- 1.4 Permission to consult on this proposal was granted at the Portfolio Holder meeting of 15 October 2012 and all feedback has been collated for consideration by the Portfolio Holder on 3 December in order that a decision can be taken on a request by officers for authorisation to publish a statutory notice to expand the school.

- 1.5 At the Portfolio Holder decision meeting of 3 December, it was resolved that the decision on the publication of statutory notices be deferred until 17 December to allow more time for consideration of the large number of responses that were received at the end of the consultation period and to allow more time to consider the rationale for the proposal and the objections received from nearby schools. The minutes of the meeting state *'that the Cabinet Member for Children and Family Services defers a decision on **Wheelock Primary School** for up to two weeks to enable further consideration to be given to additional information and comments received during the consultation period'*.

2.0 Recommendation

- 2.1 That the Cabinet Member for Children and Families Services authorise the publication of statutory notices detailing the Local Authority's proposed expansion of:

Wheelock Primary, from the 210 school places (1FE) to 315 school places (1.5FE) thus providing an additional 105 school places with effect from September 2013:

3.0 Reasons for Recommendations

- 3.1 In making this recommendation, full consideration has been given to the responses received from key stakeholders during the consultation period.
- 3.2 How statutory consultation is carried out is not prescribed in regulations and it is therefore for the Local Authority as the proposer to determine the nature of the consultation. The consultation period spanned 5 weeks. In order to facilitate feedback on the proposal, a formal consultation document was produced detailing the background and rationale for the proposed expansion and explaining the statutory consultation process. **(Appendix 1)** Information on how feedback could be provided was included, together with a feedback form, which was published online on the Council's website and was available in hard copy on request. **(Appendix 2)** Letters were emailed to all primary and secondary schools for distribution to parents and carers of children on roll at the schools. Emails were sent to all other consultees with links to the website where full details could be obtained. Contact details were provided to facilitate requests for more information or assistance with this process. Consultees include local parents and carers, representatives of nearby schools, Ward Members, the local MP, the Diocese, Parish Councils and Trade Unions. In accordance with its statutory duty under Section 176 of the Education Act 2002, the Local Authority has invited feedback on the proposed changes from pupils at Wheelock Primary School.
- 3.3 A list of all consultees is attached as **Appendix 3** together with the method of communication used.
- 3.4 Additionally, the Local Authority has held meetings during the formal consultation period with headteachers and governor representatives from the local schools. The purpose of these meetings was to provide information about the proposed expansions and to facilitate discussion and feedback. In addition

the Local Authority provided information on the pupil place planning process together with specific information regarding pupil forecasts and future housing developments relevant to the individual areas. The Local Authority notes taken at these meetings, which include comments and feedback received from attendees, are attached as **Appendix 4**)

- 3.5 A total of 265 responses have been received by the deadline of 23 November to the proposed expansion of Wheelock Primary and these are set out below.

4 Proposed Expansion of Wheelock Primary School

- 4.1 The Headteacher and Governors have been consulted and fully support the proposed expansion of the school to a 1.5 FE primary school to accommodate the growing population and increasing demand for school places.
- 4.2 Fiona Bruce, MP (Member of Parliament for the Congleton Constituency) has visited the school during the consultation period and has confirmed her support for the proposed expansion as set out in the public consultation document of September 2012.
- 4.3 A total of 271 responses have been received to the proposed expansion of Wheelock Primary by the deadline of 23 November and these are set out below. It should be noted that at the time that this report was published, 9 responses had been received and therefore, as stated in the original report, the additional responses have been included in this revised report.

Respondent	Number received	Support	Do Not Support	No View
Local MP	1	1	0	0
Local Councillor	1	0	0	1
Local residents/grandparents	6	0	4	2
Governors – Wheelock	5	5	0	0
Governors – Other schools	12	0	12	0
Member of School Staff - Wheelock	21	20	1	0
Member of School Staff – Other	19	0	19	0
Parents - Wheelock	32	19	12	1
Parents - Other	85	0	85	0
Pupils – Wheelock	84	72	2	10
Pupils - Other	3	0	2	1
Other	2	0	2	0
Total	271	117	139	15

- 4.4 Of the 271 responses received, a total of 132 respondents have indicated that they either support the proposal or have no view. This represents 48.7% of the total responses and includes 117 (43.2%) that have indicated support for the

expansion and 15 (5.5%) who have indicated that they have no view. Against the proposal 139 (51.3%) responses have been received.

- 45 Just under 15% of responses were received from school staff. This includes staff members who are also parents and staff members who are also governors. The majority of staff feedback was from Wheelock Primary at 52.5% and of these 95.2% indicated support for the proposal compared with 100% of the 19 staff in other schools not in support. Views expressed by those in support of the proposal suggest that this is a popular and successful school with growing demand that could be met by expansion.
- 4.6 Pupil participation in this consultation exercise represents nearly 1/3 of the total responses (at 32.1%) Of the 87 pupils that submitted feedback, 82.8% were in support and a further 12.6% have no view. Submissions were received from pupils attending Wheelock Primary and other schools in the area with the majority of responses (84/87) received from pupils attending Wheelock Primary.
- 4.7 117 responses were received from parents including those with children attending Wheelock Primary (which represents 11.8% of the total feedback) and parents of children in other primary schools representing 31.3% of the total feedback of 271 responses. 62.5% of Wheelock parents either supported the proposal or had no view. 100% of parents with children attending other schools that fed back their views on the proposal did not support the proposed expansion of Wheelock Primary with many commenting that investment into all schools in the area would be fairer; that this proposal could be detrimental to other primary schools; that Offley Primary should expand from 1.5 forms of entry to 2 forms of entry utilising existing accommodation; and raising questions about the introduction of another 1.5 form of entry primary and the implications that this has for class organisation. Those parents expressing support for the proposal commented that this community school should be capable of serving its local and growing community and therefore supporting local families.
- 4.8 In summary, comments received from respondents expressing support for the proposal or expressing no view included:
- Agreement that more places should be provided to ensure local families could access provision at their local school within this growing community and to ensure school places are provided within a reasonable distance;
 - Support for the expansion of an outstanding and popular school;
 - Addressing historical pattern of local children not being able to access places by developing provision for the community;
 - Enquiring as to whether 105 extra places is sufficient and asking if this should be a proposal for expansion by an additional 210 places to meet forecast demand by 2017 or is there sufficient demand to warrant a new school in the Ettiley Heath area and questioning the reduction in capacity at Sandbach Primary under Cheshire County Council;
- 4.9 Comments received from respondents objecting to the proposal included:

- Concerns that this proposal will impact on nearby schools if more places are provided at Wheelock;
- Suggestions that Offley Primary should be expanded to 2 forms of entry;
- Suggestions that this increasing demand should be addressed by expanding 3 to 4 schools in the area spreading additional places evenly;
- Rezoning of Ettiley Heath as a solution to the increased demand for places at Wheelock from within its catchment area;
- Comment that this proposal undermines the Local Authority proposed principal of schools being 1 or 2 forms of entry wherever possible – as detailed in the Draft School Organisation Framework;
- Questions about travel to school and current arrangements of transporting children from Ettiley Heath at a cost to the LA;
- Challenge that informal consultation should have been undertaken with schools in the area in the process of formulating options prior to formal statutory consultation.

4.10 Full details of the responses received during consultation are attached as **Appendix 5**

4.11 The rationale for the proposal is set out within the consultation document attached as Appendix 1 and this indicates a forecast shortfall by 2017 of 151 pupil places across all 8 schools i.e. including the two Haslington primary schools and 144 pupil places including only the 6 Sandbach schools. For admission to the reception classes in 2012, demand for places exceeded the number of reception class places and, in order to ensure that all children had a school place for September, admission over the published admission numbers was agreed to some schools. The latest catchment area data recorded on 21 November 2012 and therefore subject to further change (shown in the table below) indicates that the number of children resident within the Sandbach area for September 2013 admission will again exceed the 185 pupil places. Additional places are therefore needed in this area to ensure that the Local Authority can meet its statutory duty of ensuring sufficient school places for children resident in its area.

School Name	PAN	Numbers in Catchment Area			
	2013	2010	2011	2012	2013
Elworth Church of England Primary	40	36	37	39	31
Elworth Hall Primary	30	23	22	25	22
Offley Primary	45	37	39	52	51
Sandbach Community Primary	15	35	30	36	39
St John's C of E Primary School,	25	15	7	8	12
Wheelock Primary School	30	44	50	61	49
TOTAL	185	190	185	221	204

- 4.12 In order to determine where additional capacity should be provided the Local Authority has analysed data on each school in the area and taking into account the following:
- Level of local demand using catchment or area generally served by the school;
 - Community's ability to sustain the school;
 - Physical condition of the school premises;
 - Nature of the site, accessibility to it and scope for expansion;
 - Ability to deliver a full range of curriculum and social experiences;
 - Latest Ofsted inspections (successful schools);
 - Pattern of parental preference (popular schools).
- 4.13 Elworth CE has 280 places and is full. A review of capacity at Elworth CE is also underway due to increased demand anticipated due to new housing in the area for which contributions have been agreed with developers through the Section 106 agreement. Rezoning of the Elworth CE catchment area to Elworth Hall was determined for 2013 to prepare for potential new housing in this area arising from developer enquiries and planning applications with these developments giving a combined pupil yield of an additional 60 primary aged pupils. Elworth Hall has 210 places as a 1 form of entry primary school. Forecasts indicate that this school will have some unused capacity by 2017 with 33 spaces forecast across all year groups. This spare capacity has contributed to the analysis when arriving at the overall forecast shortfall of 151 places. The number of first preferences received as an indication of demand for places at this school has been below the published admission number of 30 places since 2009 and therefore parental choice for this school can be met by existing provision.
- 4.14 Information about possible new housing in the Sandbach area and the potential increase in demand for school places that this would produce was presented at the meetings with headteachers and governors. This information informs school place planning procedures, but due to the uncertainty over when a development will commence, this is reviewed alongside pupil forecasts to assess the impact and timescales involved. It is important to stress that this proposal for Wheelock Primary is made to address forecast basic need based on existing intakes and forecast demand and not to address the potential demand for new housing in the area.

Development	Size	Primary Pupils	Secondary Pupils	Status
Fodens	265	43	34	Planning Permission granted - Development onsite
Test Track	118	19	15	Planning Permission granted subject to section 106 agreement
Canal Fields	102	17	13	Planning Permission granted - Development onsite
Albion Inorganic Chemicals	375	61	49	Outline Planning Permission - Site incl in draft Development Strategy
Hassall Road	39	6	5	Outline Planning Permission granted

North of Congleton Road	160	26	21	Subject to current Planning Application
Land off J17	700	119	91	Site included within draft Development Strategy
Elworth Hall Farm	90	15	12	Subject to current Planning Application
Abbeyfields	280	45	36	Planning Application refused - Subject to resubmission & current appeal
Hind Heath	269	44	35	Planning Application refused
Total	2390	395	311	

- 4.15 The Draft School Organisation Framework has proposed that, wherever possible, schools should be either a 1 or 2 form of entry, providing single aged classes. It is acknowledged that this will not always be possible due to variation in demand for places, the community's ability to sustain the school and site suitability and the government presumption in favour of the expansion of popular and successful schools.
- 4.16 The Government is committed to a diverse school system characterised by improving standards and increased choice for parents and pupils. The Education White Paper outlined the expectation on local authorities to encourage good schools to expand and for the focus to be on supplying a sufficient number of good places rather than removing unused (surplus) capacity in undersubscribed schools. The Education Act 2011 introduced these requirements from February 2012.
- 4.17 Zoning arrangements are part of a school's admission arrangements and can be revised through statutory admissions consultation procedures. Whilst catchment areas are lawful practice, parents must not be required to apply for their catchment area school through the coordinated admissions process and places at the catchment area school cannot be guaranteed. Catchment areas therefore afford a level of priority within the admission arrangements for families resident in the area when applying for school places. Consequently, parental preference for any one school can result in the school serving a much wider area than its catchment area. Pupil distribution maps, which demonstrate where pupils are resident and which schools they attend, may be accessed and viewed on the website under **Appendix 6**.
- 4.18 Assisted Travel to Wheelock Primary for families resident in Ettiley Heath is funded on the basis of the hazardous nature of the route at a cost of £20,900 with 80 resident children eligible. The schools located nearby are Elworth CE and Wheelock (the catchment area school) and on the other side of the A533 (Middlewich Road) is Elworth Hall. Forecasts suggest that one of these schools will have 33 unused places by 2017 based on existing patterns of intake to the school with the other school being full. To accommodate children resident in the Ettiley Heath area of Sandbach at one or both of these schools, additional capacity would be needed.
- 4.19 The process of formulating options for consideration included consideration of the priorities listed above in paragraph 4.11. Due to the timescales involved, informal (non-statutory) consultation procedures were not implemented prior to

formal statutory consultation. Feedback on the proposal has nevertheless been facilitated during the formal consultation period and meetings arranged with groups of schools provided in depth discussion with attendees.

- 4.20 On 30 October at the start of the consultation process, a meeting was held attended by headteachers and governor representatives of the Sandbach primary schools to provide information about the proposed expansion of Wheelock Primary and the rationale for change including forecast demand and the process for change. The meeting was well attended. Attendees acknowledged the pressures for the area but expressed objection to the Wheelock proposal. Concern was expressed that informal consultation procedures had not been implemented allowing schools in the area the opportunity to be part of the process of identifying options for change and that the proposal for 105 places had the potential to impact on other Sandbach schools if additional capacity is in place for September 2013 as proposed. Additional comments were made regarding alternative solutions that attendees at the meeting considered more appropriate for the area. It was agreed at the meeting that a further meeting would be arranged during consultation to facilitate feedback on alternative solutions for the town. (**Appendix 4a**)
- 4.21 On 9 November a further meeting took place and this was well attended. (Notes of this meeting are attached as **Appendix 4b**) The issues raised at the meeting include procedure: which was questioned in relation to the undertaking of equality impact assessments, data, timing of proposals and the potential impact on other schools and consultation timescales, with recommendations in relation to the latter that the 5 weeks is insufficient. The Portfolio Holder is advised that an equality impact assessments (EIA) has been completed for the proposals for 2013 reorganisation. A review of the EIA has been implemented to take into account feedback received during the consultation period.
- 4.22 Regarding the data, schools have been assured that analysis of data is ongoing. It should also be noted that the consultation timescales are compliant with the Department for Education (DfE) recommendation of 4 weeks and that whilst the Local Authority will seek to consult informally in the future as proposed in the Draft School Organisation Framework, there is no statutory duty to do so. Attendees were advised that the proposal for Wheelock Primary is one solution to the forecast shortfall for this area, which is based on 2012 School Census data, and therefore further reorganisation may be necessary. Attendees were reassured that any future reorganisation would involve informal consultation with representatives of schools in the area to ensure that the Local Authority promotes effective working relationships with schools when discharging its statutory responsibility to provide sufficient school places for its residents.
- 4.23 A range of alternative solutions were presented at the meetings held on 30 October and 9 November for consideration and these are summarised here:
- A review of catchment areas for schools in the area
 - Possible increase in the published admission numbers for St John's CE Primary from 25 to 30 (additional 35 places across all year groups)

- Possible increase in the intake of The Dingle from 50 to 60 per year group (additional 70 places across all year groups)
- Possible expansion of Elworth CE from 40 to 45 requiring additional accommodation (additional 35 places across all year groups)
- Possible expansion of Offley Primary from 45 to 60 requiring additional accommodation (additional 105 places across all year groups)
- Space to expand Sandbach Primary if necessary

4.24 Concerns have been raised in the response that the outcome of the consultation process has been pre-determined, that feasibility work has been undertaken resulting in proposed drawings and that these have been shared with parents at the school, that a majority of headteachers of other primary schools in the area have not had the opportunity to discuss the impact on their own schools or to suggest alternative solutions. In addition, it is stated that the Local Authority refused to minute meetings held on 30 October and 9 November. Further concerns include consideration of the impact on local schools, the capital costs and the need to ensure future demand justifies this proposal. Housing has been raised suggesting that this must also feed into any proposals for future provision beyond 2014. These concerns are addressed below.

4.25 The Portfolio Holder is advised that consultation has been undertaken for a 5 weeks period and that officers have provided reassurance that no final decision has been taken on the proposal. Feasibility work has nevertheless been undertaken at a cost to the Local Authority prior to consultation. It should be noted that this is necessary to ensure that a proposal is deliverable if it is then determined post consultation. The Local Authority accepts the risk of abortive costs if expansion is not approved through this process. Meetings held with the schools in the area were arranged to ensure that nearby schools were involved in this process and that the purpose of the meetings was to raise awareness and provide information about the proposed expansion and facilitate discussion in order that feedback can be submitted during consultation. Any concerns raised were recorded for presentation to the Portfolio Holder at the meeting of 3 December and these are attached to this report as **Appendix 4**. Capital approval had been obtained for named schemes prior to statutory consultation. The Portfolio Holder is advised that internal procedures necessitate that funding is approved in principle in accordance with the Council's agreed procedures, but that a final decision to make a significant enlargement is subject to formal statutory consultation and a further 4 weeks representation period. The Local Authority has provided reassurance that there is ongoing analysis of future demand due to planned and proposed housing developments in the area and that demand from new developments is in addition and involves liaison with developers over financial contributions where existing capacity is insufficient. It is important to bear in mind that the expansion of Wheelock Primary is proposed to meet basic need requirements arising from an increasing demand for places from existing residents.

4.26 There is a suggestion in the objection from the Governing Body of Offley Primary School that surplus places in existing schools should accommodate the September intake for 2013 as a short term solution. The Portfolio Holder is

advised that for admission in September 2012, the Local Authority received 212 first preferences for the 185 reception class places provided in the 6 Sandbach town primary schools and 302 first preferences for the 275 places when including the 2 Haslington schools. To accommodate these additional children, 2 of the 6 schools agreed admissions above their Published Admission Numbers to ensure that children were accommodated in schools within a reasonable distance from their home address and taking into account parental preference. Temporary accommodation has been provided to facilitate this pending a review of capacity in the area. For admission in September 2013 there are already 253 on the system resident in the catchment areas for the 275 places in the 8 primary schools and this includes 204 in the catchment areas of the 6 Sandbach schools for which there are 185 places. Historically, this figure increases by the end of the admission process as it is based only on parents and carers who are in receipt of nursery vouchers and therefore does not include those who make alternative arrangements for their child.

- 4.27 Attendees at the meetings were reassured that the alternative solutions presented will be reported to the Portfolio Holder and can also form the basis of discussion regarding further reorganisation in this area. However, it was discussed that the alternative solutions, which comprised in total of a least an additional 245 places would need to be fully considered as this far exceeded the forecast shortfall in capacity at this time. Attendees acknowledged that not all proposed alternative solutions would be necessary to meet the shortfall but that these were considered as more affordable options and offering less short term impact on nearby schools. The Portfolio Holder is advised that a desktop feasibility exercise has been undertaken on these alternative solutions and this information can be presented at the meeting on 17 December.

5.0 Wards Affected

Wheelock Primary School is situated in Sandbach Ettiley Heath and Wheelock Ward. However consultation was undertaken with neighbouring wards:-

Brereton Rural
Sandbach Elworth
Sandbach Town
Sandbach Ettiley Heath and Wheelock
Sandbach Heath and East
Haslington

6.0 Local Ward Members

John Wray – Brereton Rural
Gill Merry – Sandbach Elworth
Barry Moran – Sandbach Town
Gail Wait – Sandbach Ettiley Heath & East
Sam Corcoran – Sandbach Heath & East
David Marren – Haslington
John Hammond – Haslington.

7.0 Financial Implications (Authorised by the Director of Finance and Business Services)

- 7.1 The proposed expansion is part of an approved block budget (grant) set aside for Basic Need. The block budget was formally approved at Council on 23 February 2012.
- 7.2 The building work would be funded from the Council's 2012/2013 Capital Programme for Basic Needs. The capital investments required are estimated at £1,608,758.

8.0 Legal Implications (Authorised by the Borough Solicitor)

- 8.1 As the additional accommodation proposed for Wheelock Primary would increase the capacity of the school by more than 30 pupils and by more than 25% the proposed enlargement is subject to statutory proposals.
- 8.2 In bringing forward proposals to expand a school, the Local Authority must comply with statutory requirements as set out in The Education and Inspections Act 2006 (EIA 2006) and The School Organisation (Prescribed Alterations to Maintained Schools)(England) Regulations 2007 (as amended by The School Organisation and Governance (Amendment)(England) Regulations 2007 which came into force on 21 January 2008 and The School Organisation and Governance (Amendment)(England) Regulations 2009 which came into force on 1 September 2009).
- 8.3 The 5 statutory stages to a statutory proposal to expand a school are:-
1. Consultation
 2. Publication
 3. Representation
 4. Decision
 5. Implementation.

Proposed timescales for the statutory process are:

15 October 2012	Portfolio Holder's Decision to formally consult on expansion
22 October 2012	5 day call in period
22 October 2012 to 23 November 2012	Consultation Period
17 December 2012	Portfolio Holder's Decision on publishing proposals in a statutory notice.
24 December 2012	5 day call in period
7 January 2013 to 3 February 2013	Proposed Representation Period (4 weeks statutory)
TBC	School Organisation Sub Committee
TBC	5 day call in period
TBC	Implementation
September 2013	Proposed Implementation Date

- 8.4 In deciding whether or not to give permission to publish proposals it is a requirement both under guidance and case law that the decision maker should consider the views expressed during the consultation and take into account the Equality Impact Assessment. It is therefore imperative that full details of all views received during the consultation period are available at the meeting on 17 December 2012. In taking the decision the Portfolio Holder should also be satisfied that the Equality Impact Assessment has adequately taken account of any further submissions or views submitted during the consultation period. (EIA is attached as **Appendix 7** to this report).
- 8.5 If the decision is taken to publish proposals, a representation period will follow which must be of 4 weeks duration and cannot be altered. This allows comments on the proposals to be made by any person, which can be objections as well as expressions of support for the proposals. This period is the final opportunity for people and organisations to express their views about the proposals and ensure that they will be taken into account when the decision is finally being made.
- 8.6 Where capital funding is required for a proposal, guidance states that the decision maker must be satisfied that that funding is available before any proposals are published.
- 8.7 Following publication of the proposals and the subsequent statutory representation period, the final decision on whether the published proposals will be implemented will normally be taken by Cabinet. In making its decision, Cabinet will have to be satisfied that all statutory requirements including statutory consultation and statutory guidance have been complied with. The legislation provides further detailed statutory advice on what factors the decision maker must take into account in reaching a final decision, which information will be contained in the final report to Cabinet.
- 8.8 In the event that the Council receives objections to any of the statutory proposals, the final decision on those particular proposals will be determined by the School Organisation Sub Committee. If there are no objections to statutory proposals, those proposals will be determined by Cabinet.

9.0 Risk Management

- 9.1 Disruption to pupils, staff and the community must be kept a minimum during the reorganisation period and any subsequent building programme. This is to ensure that standards continue to improve.
- 9.2 The proposed expansion was identified to address a basic need in Sandbach. This is in order to ensure that the Authority meets its statutory duty to provide sufficient school places in this area. In order to complete these schemes by September 2013 the construction phase would need to commence by late February 2013. There is therefore a key risk resulting from the very tight timetable leading up to this.

9.3 Implementation of this proposal will be subject to the necessary planning permissions.

10.0 Access to Information

The background papers relating to this report can be inspected by contacting the report writer:

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