

WIRRAL COUNCIL

CABINET

17TH DECEMBER 2014

SUBJECT:	<i>REPORT DETAILING THE OUTCOME OF THE REPRESENTATION PERIOD REGARDING THE PROPOSED CLOSURE OF THE LYNDALE SCHOOL</i>
WARD/S AFFECTED:	ALL
REPORT OF:	DIRECTOR OF CHILDREN'S SERVICES
RESPONSIBLE PORTFOLIO HOLDER:	COUNCILLOR TONY SMITH
KEY DECISION?	YES

1.0 EXECUTIVE SUMMARY

- 1.1 In January 2014 Cabinet agreed to undertake a consultation on the closure of The Lyndale School. Following the consultation, which closed in June 2014, Cabinet agreed on the 4th September 2014 to publish formal statutory notices advising the public of the proposed closure of The Lyndale School.
- 1.2 In accordance with the statutory guidance, **the statutory notice (Appendix 1)** and **statutory proposal (Appendix 2)** were published on 22nd October 2014. The process allows a four week period for representations to be made on the proposals, during which time any person may make comments or objections on the proposals.
- 1.3 This report and the appendices set out all the relevant information that should be considered in making a decision on the proposal to close The Lyndale School. There is also reference to an Equalities Impact Assessment which has been undertaken and is available as **Appendix 6** and on-line. Measures required to mitigate the effect of the proposal, if agreed, are also outlined.
- 1.4 The Council is the decision maker in respect of the published proposal. The proposal can be approved, rejected, approved with modification or approved subject to meeting specific condition(s). **The statutory guidance is attached as Appendix 3.**
- 1.5 The closure of The Lyndale School is being considered because the viability of the school is compromised by its small size and falling roll. There are also two other primary schools in Wirral providing good and outstanding provision for children with complex learning difficulties.
- 1.6 This report recommends that Cabinet approves the proposal to close The Lyndale School with a modification to the closure date to 31st August 2016.

2.0 BACKGROUND AND KEY ISSUES

- 2.1 The Lyndale School is a special school for primary aged children with Complex Learning Difficulties (CLD). The school is located in Eastham and serves the whole of Wirral. Most of the children currently attending the school have Profound and Multiple Learning Difficulties (PMLD). Ofsted's most recent inspection of the school in November 2012, judged that The Lyndale School was a good school, with outstanding features.
- 2.2 The future of The Lyndale School has been the subject of discussion for a number of years. This has created a degree of uncertainty for parents, pupils, staff and governors.
- 2.3 The Council has a statutory duty to ensure that there are sufficient school places in the area with fair access to educational opportunity to promote the fulfilment of every child's potential (Education Act 1996). Across all Councils in England over a period of years the range, number and needs of children and young people with special educational needs will change, so too will the resources to support the provision required to meet children and young people's needs. Therefore, it is important that our local schools change to meet changing needs, and changes in the numbers of children and young people. Consideration about how to meet the special educational needs of children and young people forms part of the Wirral Children and Young People's Plan 2014 – 16. This Plan sets out the Council's commitment to provide the very best outcomes for Wirral's children and young people.
- 2.4 The closure of The Lyndale School is being considered because the viability of the school is compromised by its small size and falling roll. There are also two other primary schools in Wirral providing good and outstanding provision for children with complex learning difficulties.
- 2.5 In January 2014, Cabinet agreed to undertake a consultation on the closure of The Lyndale School. In February 2014 this decision was referred to the Coordinating Committee which upheld the Cabinet's decision, and stated that the consultation should be meaningful, informed and transparent.
- 2.6 Following the consultation, which closed in June 2014, Cabinet decided on the 4th September 2014 to publish formal statutory notices advising the public of the proposal to close The Lyndale School. In October 2014 this decision was referred to the Coordinating Committee which resolved that the Cabinet minute 44 – 4 September 2014 (Outcome of The Lyndale School Consultation) be upheld.
- 2.7 The statutory notice (Appendix 1) and statutory proposal (Appendix 2) were published on 22nd October 2014. The process allowed a four week period for representations to be made on the proposal which closed on 19th November 2014.
- 2.8 21 responses were sent - 20 by electronic means (e-mail), 1 by post (written).

Responses	Total	Parent	Staff	Governor	Others
Elleray Park	0	0	0	0	0
Lyndale	6	3	0	1	2
Stanley	1	0	0	0	1
Other person	14	1	0	0	13

Breakdown of representations received by relationship to the three schools. "Other person" indicates respondent with a relationship to a different school or with no expressed direct relationship to any particular school.

- 2.9 The objections to the closure of The Lyndale School have a number of common themes. Section 3 below summarises the main points raised. Many points have been considered previously in the Cabinet Report dated the 4th September 2014. **A list of the issues raised is attached as Appendix 4.**

3.0 KEY THEMES WHICH HAVE EMERGED DURING THE REPRESENTATION PERIOD

Overall funding issues

- 3.1 Views were expressed that the financial arguments for the closure of the school are not convincing, that the high cost of educating the children who attend The Lyndale School will always be there regardless of the setting they attend and that additional funding could be used to support the school
- 3.2 *These and other issues have been responded to previously by the Council. Whilst it is acknowledged that the cost of supporting children with PMLD is high, the Council has demonstrated that continuing provision at The Lyndale School is not a viable option. The Council has reassured parents and carers that children will be supported in other appropriate CLD provision.*
- 3.3 *The Lyndale School is funded from the Schools' Budget. Any move to provide additional funding to The Lyndale School would need to be approved by the Schools Forum in the first instance. Supporting the school with additional funding, given the quality of alternative provision, would divert resources away from other special school / high needs provision in the borough.*
- 3.4 *Further details of viability and cost effectiveness is provided at paragraphs 4.14 to 4.19.*

Health and safety of pupils of The Lyndale School

- 3.5 Concerns have been expressed about the risk to the children of The Lyndale School, who are more vulnerable, mixing with more able children in a different school.
- 3.6 *The Council has given an assurance that the two primary schools for children with CLD would meet the needs of the children and that they would be as safe and protected as they currently are. Any gap in staff skills identified will be addressed by the two schools. Parents will be able to discuss their child's individual needs, and make sure there are thorough plans to support their child attending a different school or provision.*

Future of the staff at The Lyndale School

- 3.7 Concern was expressed about staffing ratios at the new schools, the future of the staff currently at The Lyndale School, and the loss of good parent/staff relationships at the school.
- 3.8 *Where possible, the Council will support the staff of The Lyndale School but it recognises that school governing bodies are ultimately responsible for the employment of staff. Should the other special schools require additional staff, and with the agreement of other governing bodies, staff may be given prior consideration for posts and/or consideration alongside other applicants received. Staffing ratios are a matter for the governing body of the school, taking account of the individual needs of the children and statutory requirements, including their Education, Health and Care Plans and Statements of Special Educational Needs.*

Assessment of children

- 3.9 Some concerns have been expressed about the current process to convert Statements of Special Educational Needs to Education, Health and Care Plans (EHCPs). These concerns were about the complexity of the childrens' medical needs and the new processes for EHCP assessments.
- 3.10 *EHCPs not only cover education but also health and social care needs. Work is ongoing with each individual family to convert their child's statement to EHCPs. It is recognised that both schools and families are working with new processes introduced by the Children and Families Act 2014 which came into force on the 1st September 2014. Some plans may take longer to be finalised as the Council wants to ensure that the plans reflect the needs of each child. Those details contained in EHCPs must be delivered by the agencies identified for all children regardless of the school or setting.*

Physical environment

- 3.11 The amount of available internal and external space at the other two primary schools for children with CLD has been raised as a concern.
- 3.12 *The Council and the receiving schools have given their assurance that pupils of The Lyndale School will have their needs appropriately met at their new school. Elleray Park School already has an agreement to expand, with work due to start on site shortly. Stanley School is a new school with generous space. The Council is in discussion with the school about the usage of the current facilities and the potential for further enhancements. Accommodation at both receiving schools will be ready for the children at the time they transfer. Both schools are accessible.*
- 3.13 *The organisation of the school is the responsibility of the head teacher.*
- 3.14 *In the Cabinet Report of 4th September 2014 a commitment was made that every effort would be made to relocate / recreate the sensory garden.*

Pupil numbers

- 3.15 Concerns have been expressed that The Lyndale School has been in a “managed decline” for some time, and that there could potentially be more children with CLD in the future.
- 3.16 *The Lyndale School has always been presented as an option for which parents can express a preference when making their choice. However, the number on roll has been falling for some time. The reducing numbers of children attending The Lyndale School means that it is not a viable option for the future. There is sufficient space in the two alternative schools for all current and projected children with CLD.*
- 3.17 *Classroom size and the organisation of the curriculum is the responsibility of the head teacher and governors.*

SEN Improvement Test

- 3.18 Concern has been expressed about the appointment of the independent consultant and the validity of the SEN improvement test.
- 3.19 *To demonstrate that the Council was taking into account an objective view, an Independent Consultant was engaged to apply the criteria of the SEN Improvement Test. The independent consultant engaged has considerable experience of both mainstream and special schools including children with PMLD. The consultant was recruited through a nationally recognised consultancy with a great deal of experience in special educational needs. The consultant was commissioned for 18 days to look at the options presented to Cabinet in January 2014 and to further consider any new options or variations to options which emerged throughout the consultation period.*
- 3.20 *Both Stanley School and Elleray Park School can cater for children with PMLD.*
- 3.21 *Section 4 of this report outlines how the proposal meets the SEN Improvement Test.*

The Consultation

- 3.22 Issues were raised about the consultation being too long and that responses provided were not taken seriously.
- 3.23 *The consultation was designed to ensure that it gave both those directly related to the school, and the wider community, every opportunity to respond. Officers of the Council attended each consultation meeting to listen to and note all comments and concerns raised, providing answers where it was possible to do so. Written responses were also considered, and responded to. A detailed account of the consultation process and a summary of responses were reported to Cabinet on the 4th September 2014. Members of the Cabinet were also provided with copies of the responses and the submitted petition.*

Comments on the proposal to close The Lyndale School

- 3.24 The key points raised were about parental choice of school if The Lyndale School were to close and the timing of the proposed closure of the school.
- 3.25 *If the decision to close the school is made, families will be invited to look at all the options available to meet the needs of their child. Every child will have an EHCP coordinator to support their move to another school and to ensure that all the specialist support for each child continues at their new school.*
- 3.26 *Following further concerns raised about the timing of the closure of the school, it is recommended that if the decision is taken to approve the proposal, **a modification is made so that the school closes on 31st August 2016.** This would mean that children currently in Year 5 would not transfer twice in one year.*

4.0 DECISION MAKERS GUIDANCE

- 4.1 The statutory guidance at **Appendix 3** requires Cabinet as the decision-maker in respect of the closure of The Lyndale School to have regard to a number of factors where relevant. The paragraphs below address the relevant sections in the statutory guidance which could be grounds for rejecting the proposal.

The Consultation and Statutory Process

- 4.2 A public consultation on the proposal to close The Lyndale School began on the 2nd April 2014 and ended on the 25th June 2014. Copies of the consultation document were distributed to the parents/carers, teachers and governors of the three primary schools for children with CLD. All Wirral head teachers and governing bodies were sent copies along with Trade Unions, Wirral MPs and Councillors, neighbouring Councils, diocesan bodies, Council departments and other interested persons. The document was also published on the Council's website for residents to gain access. In addition a series of six public meetings were held.
- 4.3 Officers also had meetings with Alison McGovern MP and the parent governors of The Lyndale School to explore the feasibility of options.
- 4.4 Meetings were held separately with the staff and governors of each of the three primary schools for children with CLD and also with the five head teachers of the five schools, both primary and secondary, for children with CLD.
- 4.5 Members of the Council also took an opportunity to visit the special schools for children with CLD over a period of two days (16th and 17th June 2014), and some members visited on other occasions.
- 4.6 The statutory notice was published on 22nd October 2014. The representation period ran for the required 4 weeks and the published Statutory Notice (**Appendix 1**) and Statutory Proposal (**Appendix 2**) contained all the required information.
- 4.7 Representations received are outlined above and copies of the representations have been provided to Members. A redacted copy of the responses was placed in the Members Room on 5th December 2014.

- 4.8 The consultation, statutory notice, proposal, and representation period meets statutory requirements. This is not grounds to reject the proposal.

Considering views expressed during the Consultation

- 4.9 The responses received during the consultation were analysed and reported to Cabinet on 4th September 2014, Cabinet also received full copies of the responses and the petition that were submitted as part of the consultation. The report of 4th September 2014 also detailed how the various options were assessed against the SEN Improvement Test.
- 4.10 The views expressed in the consultation period and throughout the process have been taken into account. This is not grounds to reject the proposal.

Education Standards and diversity of schools

- 4.11 Should the decision be taken to approve the proposal, there are two other primary schools in Wirral with good and outstanding provision for children with complex learning difficulties.
- 4.12 The table on page 6 of the Statutory Proposal (**Appendix 2**) details the most recent Ofsted judgments of the primary schools for children with CLD within Wirral.
- 4.13 There is good quality alternative provision for children with CLD within Wirral. There are also other primary special schools in the wider region, providing a diverse range of good quality provision. This is not grounds to reject the proposal.

Viability and cost effectiveness

- 4.14 The closure of The Lyndale School is being considered because the viability of the school is compromised by its small size and falling roll which impacts on its sustainability for the future.
- 4.15 A new national system of funding was introduced by the Department for Education in 2013 for the funding of pupils with High Needs in schools. Under the new system, each school receives an amount of £10,000 per place, with an additional “top-up” based on the needs of the individual pupil. This is called “Place Plus” funding.
- 4.16 The new funding arrangements apply to all schools, including the three existing primary special schools for children with CLD in the Wirral area. However, the impact on The Lyndale School will be significantly greater than the other two schools, Elleray Park School and Stanley School. This is because there is a greater difference at The Lyndale School between the number of places and the number of pupils, and because it is a small school.
- 4.17 For the 2014-15 financial year The Lyndale School set a balanced budget of £743,345 based on funding for 40 places, when it had 23 pupils on roll at January 2014 Census. Any single place reduction will represent a loss of £10,000 to the base budget for the school. Therefore any future reduction in place funding to 23 pupils

(the number of pupils on roll), would result in the school receiving a budget which is £170,000 less than currently.

- 4.18 Taking into account these figures the school's budget shortfall would increase by a similar amount each year, unless action was taken to reduce costs. Staffing costs are the highest proportion of the school's budget and reductions would need to be made where possible; this is likely to impact on the effective running of the school.
- 4.19 The issues around viability and cost effectiveness are not grounds to reject the proposal.

Equality Duty and Community Cohesion

- 4.20 An equality impact assessment has been completed and details the measures that will be taken to ensure that the Council pays due regard to the Public Sector Equality Duty (PSED). This is available on the Council's website. Community users of the school have been identified and if the proposal is approved the Council will work with the community users to help them find suitable facilities.
- 4.21 There are two other primary schools serving the Wirral community providing good and outstanding provision for children with complex learning difficulties. This is not grounds to reject the proposal.

Travel arrangements

- 4.22 The Council provides free home to school transport to children attending The Lyndale School, based on an assessment of the child's needs. If the proposal to close the school is approved, children will continue to be provided with free home to school transport to their alternative school placement. The proposal is unlikely to result in any increase in car use overall.
- 4.23 The travel section on page 7 of the Statutory Proposal (**Appendix 2**) provides further anonymised details of the current and potential journeys undertaken by the children currently on roll at The Lyndale School. This is not grounds to reject the proposal.

Land and buildings

- 4.24 Ellaray Park and Stanley Schools both provide suitable outdoor space. As part of any transfer process, the possibility of relocating / recreating the sensory garden currently at The Lyndale School will be evaluated. This is not grounds to reject the proposal.

Range of provision and the SEN improvement test

- 4.25 When considering any reorganisation of provision that the Council considers to be reserved for pupils with special educational needs, including that which might lead to children being displaced, it is necessary to demonstrate how the proposed alternative arrangements are likely to lead to improvements in the standard, quality and/or range of educational provision for those children.

- 4.26 Both Stanley and Elleray Park Schools are schools which cater for children with CLD including children with PMLD and provide full time education provision. As the Independent Consultant's report states both schools have received good or outstanding Ofsted inspections and Ofsted would suggest that the standard and quality they provide is at least as good if not better than The Lyndale School. The provision at both schools provides for a range of special needs and PMLD is part of that provision. Both schools can provide flexible and individual provision to their pupils depending on their needs at any given time. The high quality of provision at these schools covers a range of areas including, achievement of pupils, quality of teaching, behaviour and safety of pupils, leadership and management of the schools and overall effectiveness. These are key national areas of judgement which Ofsted recognise as good or outstanding. These Ofsted judgements also recognise that both schools offer a broad and balanced curriculum for all their children.
- 4.27 Families expressing an interest in these schools will be offered an opportunity to visit the schools to see for themselves what is on offer. Both schools offer Foundation 1 places and extended school provision in terms of after school and holiday clubs. Families can also consider alternative educational provision that is available in the wider area. Each child will have an EHCP coordinator to support their move to another school and to ensure that all the specialist support for each child continues at their new school.
- 4.28 Both schools have very experienced and trained staff and where there are training needs identified in the support of the children of The Lyndale School both schools and the Council have given their commitment to meet these training needs. The governing bodies of both schools will ensure that any training needs gaps are closed as part of any transition to the school should the decision to close The Lyndale School be taken.
- 4.29 Independently of the proposal to close The Lyndale School, capital works are currently being planned for Elleray Park School to further enhance the existing provision there. Stanley School is a newly built school with generous space and facilities to cater for all the needs of children with CLD, including children with PMLD. The Council is in discussion with the school about the usage of the current facilities and the potential for further enhancements.
- 4.30 Work is underway with the families of The Lyndale School to convert the children's statements of special educational needs to the new Education, Health and Care Plans. Should the decision be made to close the school further work will be undertaken to name an appropriate school in the individual plans of each child.
- 4.31 The proposal is about primary provision. Secondary school and 14-19 provision is already available through other schools and providers.
- 4.32 The SEN Improvement Test has been met. The provision described is likely to lead to the standard and quality of education provision. These are not grounds to reject the proposal.

School capacity

- 4.33 There is alternative specialist Wirral provision for primary aged children with CLD at Stanley School, Pensby and at Elleray Park School, Wallasey. Pages 2, 3 and 4 of the Statutory Proposal (**Appendix 2**) provide further details about pupil numbers and capacity at the schools.
- 4.34 Taken together, the capacity of Elleray Park and Stanley School would give sufficient places across the two schools to meet the needs of all existing and future projected Wirral children with CLD. This is not grounds to reject the proposal.

Successful / Popular Schools presumption for approval

- 4.35 Should the proposal be agreed, there are two popular and successful primary special schools for children with CLD in Wirral.

5.0 RELEVANT RISKS

- 5.1 If The Lyndale School's future is not determined there is a danger that its financial position would worsen as a consequence of its small roll and ultimately impact on the quality of education available at the school.
- 5.2 If a decision is not made by Cabinet by 14th January 2015 then the decision on the proposal will revert to the Schools Adjudicator.

6.0 OTHER OPTIONS CONSIDERED

- 6.1 Under the Department for Education (DfE) guidance a proposal can be approved, rejected, approved with modification or approved subject to meeting specific condition(s).
- 6.2 The statutory notice proposed a closure date of 31st December 2015 for The Lyndale School. Considering the representations made during this period, it is now recommended that a modification is made to the proposal to close the school on the 31st August 2016.

7.0 CONSULTATION

- 7.1 A public consultation on the proposal to close The Lyndale School began on the 2nd April 2014 and ended on the 25th June 2014. Copies of the consultation document were distributed to the parents/carers, teachers and governors of the three primary schools for children with Complex Learning Difficulties (CLD). All Wirral head teachers and governing bodies were sent copies along with Trade Unions, Wirral MPs and Councillors, neighbouring Councils, diocesan bodies, Council departments and other interested persons. The document was also published on the Council's website for residents to gain access.

- 7.2 Cabinet decided on 4th September 2014 to publish formal statutory notices advising the public of the proposed closure of The Lyndale School.
- 7.3 In accordance with the statutory requirements, a four week representation period ran from 22nd October 2014 until 19th November 2014. During this period the views of all interested parties were sought. A review of key points made in the representations can be found in section 2 of this report. A set of redacted representations are provided as Appendix 5. An set of unredacted representations has been provided to Members of the Cabinet.

8.0 OUTSTANDING PREVIOUSLY APPROVED ACTIONS

- 8.1 The Coordinating Committee dated the 2nd October 2014 agreed that the Director of Children's Services ensure that Education, Health and Care Plans for all pupils at The Lyndale School are completed by 31st October 2014.

9.0 IMPLICATIONS FOR VOLUNTARY, COMMUNITY AND FAITH GROUPS

- 9.1 Groups have been identified as community users of The Lyndale School that may be affected by this proposal if it is approved. These are set out on page 4 of the Proposal.
- 9.2 If the proposal to close the school is approved following the completion of the statutory processes, the Council will work together with community users of the building to help them find alternative facilities to meet their needs.

10.0 RESOURCE IMPLICATIONS: FINANCIAL; IT; STAFFING; AND ASSETS

- 10.1 The Lyndale School is funded from the Schools' Budget.
- 10.2 In 2014-15 The Lyndale School has set a balanced budget based on funding for 40 places and 23 pupils on the school roll. A future reduction in place funding to 23 pupils would result in the school receiving a budget which is £170,000 less than the current budget. In future years, if the school did not reduce expenditure its deficit would increase year on year. The position when this is introduced is not sustainable without additional resources being identified or impacting on the remaining special schools.
- 10.3 Staffing: The Lyndale School currently employs 30 staff (21.21 FTE) teachers, teaching assistants and support. If the school closes their employment would cease. It is likely that successor schools would need to recruit additional staff to accommodate the needs of pupils transferring. Where possible the Council will support the staff in seeking employment.
- 10.4 Assets: If the school closed the site would be declared surplus and would be considered for other purposes.

11.0 LEGAL IMPLICATIONS

- 11.1 The representation process has been designed to meet the necessary statutory requirements.
- 11.2 The Cabinet is the “Decision-Maker” in respect of the closure proposal for The Lyndale School. The Decision-Maker has to take account of the statutory guidance issued by the Secretary of State before reaching a decision.
- 11.3 All determinations (rejected and approved – with or without modifications) must give reasons for such a decision being made. Within one week of making a determination the decision-maker must arrange for the decision and the reasons behind it to be published on the website where the original proposal was published and arrange for statutory bodies to be notified as detailed in the guidance.

12.0 EQUALITIES IMPLICATIONS

- 12.1 Has the potential impact of your proposal(s) been reviewed with regard to equality?
 - (a) Yes and impact review can be found as **Appendix 6** and via the following link:

<https://www.wirral.gov.uk/my-services/community-and-living/equality-diversity-cohesion/equality-impact-assessments/eias-april-2014/eias-families-wellbeing>

13.0 CARBON REDUCTION AND ENVIRONMENTAL IMPLICATIONS

- 13.1 If a school closes or there is an amalgamation of schools the relocation of pupils to other existing schools is likely to reduce the energy consumption of the whole school estate across the borough.

14.0 PLANNING AND COMMUNITY SAFETY IMPLICATIONS

- 14.1 Any alteration or addition to school premises would require relevant planning permissions and building control approval.

15.0 RECOMMENDATION/S

- 15.1 The Director of Children’s Services recommends that:

Following careful consideration of all relevant representations, information, details and matters arising in respect of the proposal, which includes but is not limited to the:

- a. Council's statutory duty to ensure that there are sufficient school places in Wirral with fair access to educational opportunity to promote the fulfilment of every child's potential;
- b. statutory guidance (which includes grounds for rejecting the proposal);
- c. statutory process that has been followed;
- d. SEN Improvement Test;
- e. Equality Impact Assessment;
- f. size and falling roll of The Lyndale School;
- g. provision of two other primary schools in Wirral providing good and outstanding provision for children with complex learning difficulties;
- h. representations and responses received to the consultation;
- i. financial issues, implications and representations; and
- j. information, details, implications and issues set out within this report and its appendices,

Cabinet approves the proposal to close The Lyndale School with a modification to the closure date to 31st August 2016.

16.0 REASON / S FOR RECOMMENDATION/S

- 16.1 The Council has a responsibility to manage resources effectively for all schools and the school population. We would like to affirm our continued intention to work positively with the children and families affected by any recommendations, and reassure parents of our continued commitment to their child's wellbeing and education.
- 16.2 The closure of The Lyndale School is being approved with a modification to its closure date because the viability of the school is compromised by its small size and falling roll. There are also two other primary schools in Wirral providing good and outstanding provision for children with complex learning difficulties.
- 16.3 The proposal has met the requirements of the SEN Improvement Test as outlined in the report to Cabinet on the 4th September 2014.

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APPENDICES

- Appendix 1** – The Statutory Notice.
- Appendix 2** – The Statutory Proposal.
- Appendix 3** – Statutory Guidance
- Appendix 4** – A detailed list of the issues raised during the representation period
- Appendix 5** – Redacted Representations
- Appendix 6** – Equality Impact Assessment

BACKGROUND PAPERS/REFERENCE MATERIAL

No additional reference material has been used in the construction of this report.

BRIEFING NOTES HISTORY

Briefing Note	Date

SUBJECT HISTORY (last 3 years)

Council Meeting	Date
Cabinet	16th January 2014
Coordinating Committee	27th February 2014
Cabinet	4th September 2014
Coordinating Committee	2nd October 2014