

~~Exempt~~ Delegated Decision Making Form

REF NO
PH/NC/O
2516

~~NOT FOR PUBLICATION~~

~~The information contained within this report is exempt under paragraphs 5 and 7 of the Local Government Act 1972 because it contains legal advice relating to the Proposed Public Spaces Protection Order (PSPO) and, having regard to all the circumstances, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.~~

~~The public interest in maintaining the exemption outweighs the public interest in disclosing the information because this advice is professionally privileged and relates to potential proceedings which may arise from the proposed PSPO.~~

Decision Type

X	Portfolio Holder		Ward Councillor		Officer
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Department

Commercial & Operations

Subject

Nottingham City Council Prohibition of Alcohol Consumption and Dispersal of Groups in the Hookley Area Public Spaces Protection Order (PSPO)

Decision

<p>This is not a key decision because it does not result in the Council incurring expenditure or making income or savings of more than £1 million revenue or capital, taking into account the overall impact of the decision (unless this has been delegated by an authorised body). It also does not significantly affect communities in 2 or more wards</p>	Subject to call-in: Yes
	Total value of decision: £ Nil
	Revenue or Capital: N/A
	Executive or Non-executives
<p>Decision taken To note the evidence gathered and the results of the consultation on the proposal to introduce a Public Spaces Protection Order ("PSPO") as indicated in the draft PSPO attached at Appendix 1 for the area outlined in blue on the plan in the draft PSPO ("the Restricted Area"). Being satisfied that the test in section 59 of the 2014 Act is met, and having regard to the rights of freedom of expression and freedom of assembly, to authorise the Head of Legal Services to make a PSPO in the form indicated in the draft PSPO attached at Appendix 1 over the Restricted Area to last for a period of three years from the date that it comes into force. To authorise the Director of Community Protection to carry out the necessary advertisements and arrange for appropriate signage to be erected in accordance with the legislative requirements. To set the fixed penalty amount for offences committed contrary to the aforementioned PSPO at £70 if paid within 14 days, reduced to £35 if paid within 10 days.</p>	

Other Options Considered
(with reasons for rejecting options not favoured)

1. Doing Nothing
The Hockley and Lace Market areas are already subject to a Designated Public Place Order ("DPPO") made under the Criminal Justice and Police Act 2001 ("the 2001 Act") where restrictions on consumption of alcohol in a public place apply. Section 12 of the 2001 Act provides that an Authorised Officer (which includes Community Protection Officers ("CPO")) who reasonably believes a person is or has been consuming or intends to consume alcohol in a designated public place, can request that person(s) refrain from doing so and may ask the person(s) to surrender any alcohol or alcohol containers (including sealed containers) in their possession. Failure to comply with the Officer's request becomes an offence for which they could be arrested. Confiscations of alcohol are made daily under the existing DPPO in the Hockley and surrounding area. However, frequently, the individuals purposefully consume the alcohol before the empty container is handed over to the Officer. Currently only Police Officers can issue a Penalty Notice for Disorder (PND) if a request made under section 12 of the 2001 Act to surrender the alcohol is not complied with. Under the proposed PSPO the power to issue a PND for breach of the Order will apply to any person authorised under the PSPO. Experience indicates that individuals, who have had their alcohol confiscated often purchase more alcohol.

The existing powers under the DPPO are insufficient in dealing with the on street consumption of alcohol and in preventing the high numbers of those congregating within the Hockley area of the city, who repeatedly and persistently engage in the activity of street or public drinking and associated anti-social behaviour. The proposed PSPO also contains powers of dispersal.

Where the evidence has been made available, individuals who have repeatedly breached the DPPO have been issued with Court Orders such as ASBOs, CRASBOs, CBOs and Civil Injunctions. However, this approach has proven costly and time consuming and there can be identification difficulties.

2. Increased Uniformed Patrols.
Increased uniformed patrols have helped monitor the situation and have acted as a deterrent. However, they have also highlighted the concerns already raised by complainants. Officers are powerless in requiring the individuals causing the problems identified above to leave the area. Increased uniformed patrols, combined with the proposed powers of dispersal where the proposed PSPO is breached, may help to solve the problem.

3. Other intervention
Various intervention methods have been adopted and are continually sought in order to help and direct repeat offenders away from street drinking. Work with partner agencies, homeless outreach teams and drug and alcohol service providers such as Framework, Opportunity Notion, Last Orders, and the monthly Crime and Drugs Partnership (CDP) led Street Drinkers and Beggars case conference meeting, is ongoing. Offenders are referred to these agencies and discussed within the CDP multi agency forum. However, individuals who intentionally persist in street drinking and refuse to accept or engage in offers of help available to them require enforcement measures taken against them. This approach is fully supported by partners such as those mentioned above, and will continue, but if enforcement is still necessary, and if made, the Proposed PSPO will provide a further enforcement tool.

4. Dispersal Orders under the 2014 Act
Under The Anti-Social Behaviour, Crime & Policing Act 2014 ("the 2014 Act"), senior Police Officers also have the power to issue short-term Dispersal Orders. Dispersal Orders, which can be used in a specified locality for up to 48 hours, allow Police Officers and Police Community Support Officers to issue a direction requiring specified individuals to leave a designated area for a short period of time i.e. 12 hours where the legislation applies. Local Authority accredited Officers (Community Protection Officers) are not able to disperse those of a concern under this legislation, and if problems continue, a new Dispersal Order must be obtained after 48 hours.

As a result of this, the Council is seeking to address this with a more permanent and enforceable solution to the problems identified and frequently complained of in the Restricted Area.

Reasons for Decision(s)

A need has been identified to control anti social behaviour associated with the on street possession and consumption of alcohol and the high number of groups of people congregating and engaging in this activity and associated anti-social behaviour in the Hockley area of the City.

It is proposed that the PSPO applies to the area shown outlined in blue on the plan attached at Appendix 1 ("The Restricted Area"). The behaviour identified is persistent, irresponsible and unreasonable and is a frequent cause of harassment, alarm and distress which is impacting on those that live, work and visit the Hockley and to a lesser extent the Lace Market and Sneinton Markets areas of Nottingham. The Lace Market and Sneinton Market areas have been included within the Restricted Area as the potential for displacement is recognised in these surrounding areas which have a history of such issues, and it is felt that it is likely that the above mentioned behaviour will be carried on in these areas.

The Director of Community Protection authorised the formal consultation on the potential introduction of a PSPO in the form of the draft PSPO attached at Appendix 1 in respect of street drinking and its associated anti social behaviour in the Restricted Area. The draft PSPO proposes the following restrictions:

- Consumption of alcohol in the Restricted Area is prohibited where an Authorised Person reasonably believes that a person is, or has been, consuming alcohol or intends to do so and requires them not to consume the alcohol or to surrender anything in their possession which contains, or which the Authorised Person reasonably believes to contain, alcohol. Failure to comply with such a direction would be an offence.
- Groups of two or more persons are prohibited in the Restricted Area where one or more of the said group causes Anti-social Behaviour as defined in section 2(1)(a) of the 2014 Act. Such behaviour is continued where an Authorised Person has informed them that if the behaviour continues, they will be deemed to constitute a Prohibited Group and will commit an offence, and asked the relevant person(s) in the group to desist from such behaviour but they have refrained from doing so. The effect of the PSPO, if made, would make it an offence to fail to comply with the Order without reasonable excuse.

The proposed PSPO would prohibit the on street consumption of alcohol within the Restricted Area. Any individual that has been warned to stop consuming alcohol and who continues to do so after that warning would be guilty of an offence. As with the existing DPPO, no offence would be committed under the proposed PSPO by those consuming alcohol within the confines of licensed premises and their outside licensed curtilage areas.

If an individual breaches the proposed PSPO, an "Authorised Officer" including Community Protection Officers, may require the person to not consume alcohol in the restricted area and / or immediately surrender anything which is or which the Authorised Officer believes to be alcohol. The Authorised Officer would also inform that person that failure to comply with the requirement is an offence.

Furthermore, the proposed PSPO would also prohibit the congregation of groups of 2 or more persons ("Prohibited Group") where one or more of that group are engaging in anti-social behaviour ("ASB") in the Restricted Area and would allow Authorised Officers (Police officers, Police Community Support Officers and Community Protection Officers) to disperse such Prohibited Groups from the Restricted Area, if the ASB does not cease once a warning has been given.

Under Section 59 of the 2014 Act, Local Authorities may make a PSPO if satisfied that on reasonable grounds:-

- Activities in a public place have had a detrimental effect on the quality of life of those in the locality, or it is likely that activities will be carried on in the locality and they will have that effect.
- The effect/likely effect, of the activities is/are likely to be persistent/continuing in nature, is likely to be such as to make the activities unreasonable, and justifies the restrictions imposed.

The Council must be of the opinion that the problems outlined above meet the test in section 59 of the 2014 Act. The Council has gathered supporting evidence in line with the above requirements.

The Council, in conjunction with Nottinghamshire Police already utilise various intervention techniques to help prevent alcohol related nuisance and annoyance occurring. The proposed PSPO will assist and strengthen the approach taken by these agencies against those who choose to continue to act in an irresponsible manner in respect of street drinking.

The proposed PSPO is not intended to interfere with responsible persons frequenting the area to work or use the facilities available, particularly those who require the services of partner agencies located within the Hockley area, such as Emmanuel House and the Health Shop Needle Exchange, or interfere with local tenants and residents using the Restricted Area.

When considering a PSPO the Council must have particular regard to the rights of Freedom of Expression and Freedom of Assembly set out in Articles 10 and 11 of the Human Rights Convention. The purpose of the proposed PSPO is to prevent those that are causing evidenced ASB from continuing after they have been asked to stop the identified behaviour/hand over their alcohol and warned of the consequences of that behaviour. It is intended that those going about their business in a peaceful and lawful manner would not be affected by the prohibitions or the proposed PSPO.

Affected Wards

St Anns & Bridge Wards,

Advice Sought

	Yes	No
Legal	X	
Finance	X	
<p>COST OF SIGNAGE – This will be taken from Community Protection's budget. Alison Roberts of CP is the contact. Design costing around £100. It is currently estimated that approximately 20 signs will be required, the cost of 20 x A4 £562, which includes fitting. Fast Graphics fixes them up. Once designed Community Protection will get approval from highways to put up the signs in agreed locations.</p>		
Human Resources	<input type="checkbox"/>	X
Equality & Community Relations Team	X	No response
Voluntary and Community Groups		X
Grants Team		X
Procurement		X
Other (please specify)		X

Details of Consultations undertaken

	Yes	No	Name and Date
Portfolio Holder	<input type="checkbox"/>	<input type="checkbox"/>	Cllr Heaton
Ward Councillors	X		Cllr Collins, Cllr Johnson, Cllr Liversidge & Cllr Edwards.
Area Committee		X	(All Ward Cllrs named above were contacted. This has not gone to Area Committee as Delegation 127(a) of the Constitution applies, and this is a matter which affects more than Ward in the City Centre.)
Other Council Bodies		X	
Corp. Directors Affected		X	
Trades Unions		X	
Minority Group		X	
Others (Specify)		X	Public Consultation in accordance with the 2014 Act and relevant Regulations including Police, Residents, visitors, Business owners and staff, Partner Agencies and Service Providers such as members of the GDP Street Drinkers & Beggar's multi agency forum.
<p><u>Reasons for not consulting.</u> Those not consulted are not impacted by the decision</p>			

Consultation Outcomes

Before a PSPO can be made consultation must be undertaken in accordance with the 2014 Act and Regulations made under it. Initially, during August and early September 2015, the Council sought the views of members of the public and businesses in the Hockley Area on a PSPO with the intention of tackling the problems identified with street drinkers and associated anti-social behaviour in the Hockley and Lace Market areas. Members of the public in this area, being those that live, work and visit the area were approached and asked to take part in a questionnaire or directed to completing one on-line. The number of respondents who completed the hard copy version of the questionnaire totalled 91, 23% being residents of the area, 13% being business owners, 20% staff members of businesses and 44% being visitors to the area. The results showed that street drinking in the area was considered a very big problem to 53%, a fairly big problem to 32%, not a very big problem to 10%, not a problem at all to 2% and 3% of respondents didn't know. Comments received within the responses ranged from "street drinking needs to stop", "Street drinking in the area is deterring people entering areas of the city", "I find it very uncomfortable walking home at night because of street drinking" and "I have seen groups of people sitting and lying on the pavement, some obviously drunk, this has caused me to feel uncomfortable and intimidated when passing them, it is starting to make me think twice about socialising and using the businesses in that area". Responses received suggesting alternatives to the proposed PSPO are highlighted as:- "Solution-Move support services for alcohol and drug users to a different part of the city", "With having the drop in centres around the area including the Health Clinics it does not help raise the profile of the local independent businesses", "I thought there was already a DFPO in place to control this, there seems to be few Officers on the beat to stop it" and "I think the focus needs to be on targeting illegal behaviour rather than a blanket ban on drinking, why should someone who will drink sensibly be prevented from doing so?". Support services in the area, the NHS Health Shop (Clinic) on Broad Street and the Emmanuel House Day Centre on Goosegate are well established, essential and heavily used premises that have certainly in the case of Emmanuel House been in their respective locations for many years. Moving them to other locations is simply not an option at this time, nor is it under the Council's control. A DFPO is in place City wide however, for reasons stated hereto the proposed PSPO is viewed as a more manageable and effective alternative in the Restricted Area. With regards to the point made of there being a blanket ban on drinking, this is not and is not intended to be the case, the purchase and consumption of alcohol within the curtilage of licensed premises is clearly not affected. Some comments received viewed the proposed PSPO as un-necessary stating, "I have never noticed anything that could disrupt or intimidate anybody, I would say it is one of the better parts of the city", "Street drinking and its issues are not only related to homelessness, bars opening late at night often have people drinking on the street, more responsible drinking habits need to come from both the bars and punters", "Leave people alone to live their lives", "Got no problem with street drinking" and "I think the Hockley area is one of the most lively, vibrant and enjoyable areas of the city, vastly improved by the recent highway works on Broad Street and Heathcoat Street, please don't ruin it by over-zealous enforcement of petty rules and regulations". Although the above responses are greatly outnumbered by those who recognise the problems street drinking brings to the Restricted Area, as shown by the results of the Consultation, they have been carefully considered. If the proposed PSPO is made Authorised Officers will receive appropriate training on the Order and enforcement will be proportionate where the problems caused continue. The on-line version of the questionnaire showed that 24% of those responding considered street drinkers in the Hockley and Lace Market Areas of the City to be a very big problem, with 42% stating that they were a fairly big problem, 18% stated they were not a very big problem, 10% not a problem at all, and 6% didn't know. In total 138 online questionnaires were completed, 18% residents, 4% business owners, 10% staff members of businesses and 78% visitors to the area. Attached as Appendix 2, is a copy of the blank questionnaire and the results of the questionnaires. The Director of Community Protection authorised the formal consultation required under the 2014 Act for the proposed PSPO at Appendix 1 in relation to the Restricted Area. This Consultation commenced during early October 2015 and concluded on 26th November 2015. The proposed PSPO was published on the Council's Website on 21st October 2015, a copy of the proposed PSPO with consultation questions were hand delivered to 100 business and retail premises within the Restricted Area. Also consulted were both the Emmanuel House Day Centre and The NHS Walk-in Centre located within the Restricted Area, numerous copies of the proposed PSPO were left at these premises facilitating those that use their services to make their representations. The Restricted Area also has numerous residential premises, a group of such premises managed by Nottingham City Homes, all of which copies were hand posted through their letterboxes. Those multi storey premises such as Habitat Place within the Lace Market area had copies left within the communal foyer's or posted onto the residents notice boards, residents outside of these premises were also handed copies and consulted with in person. The Nottingham Arena and National Ice Centre were also consulted. The proposed PSPO was also uploaded onto the Nottingham BID web site (02/11/15), the Community Protection web site (23/10/15), the Creative Quarter web site (23/10/15) and a link to the proposed PSPO was uploaded onto the Safe Nottingham Community Protection twitter account page (23/10/15). Also on this date both the NHS Health Shop Needle Exchange and Emmanuel House were consulted with and issued with numerous copies of the proposed PSPO and consultation pack for the benefit of their service users. On 22/10/15 a total of 30 lamp posts in the proposed Restricted Area had attached to them copies of the consultation pack and proposed PSPO. The Council also consulted with the Police who are in support of the proposed PSPO. This consultation process was also reported within the media, both local TV and radio, with directions to where and how to make further representations being made public. Numerous web sites in addition to the City Council's website also facilitated the consultation process. A further summary of the responses from drug, alcohol and homelessness support groups is also attached as background papers. These responses were in favour of the proposed PSPO, some of which read as follows:- "As Co-Chair of the Street Drinking and Begging Case Conferencing Group in Nottingham City Centre, I support the draft proposed PSPO in the Lace Market and Hockley areas of Nottingham City Centre. I feel the dispersal of those persons exhibiting anti social behaviour will make it easier and more likely for more vulnerable people to access any support they may require from Emmanuel House Day Centre as well as limiting any damaging behaviour that may, in the eye of the general public, contribute to a negative perception of the day centre and the locality in general."

"Our pub in Hockley, have passed me your letter dated 12th October 2015 regarding the proposed PSPO. We are very much in favour of the Order and are behind it 100%." "Chary and myself have had a good look through this document and providing that, as you have stated, there are no changes which will affect licensed premises in the area, we support the proposed PSPO Order." Thoughts have been given to those responses that have questioned the issue of the Proposed PSPO displacing the identified concerns elsewhere into the City Centre: The potential for displacement is recognised and is why the proposed Restricted Area includes the adjacent areas being the Lace Market and Sneinton Market locations. Although these areas presently are not as heavily affected as Hockley, they do have a history of such issues. It is envisaged that if displacement does occur it will be within these locations. Accordingly, the Proposed Restricted Area now looks to preempt and prevent such displacement.

After careful consideration of the evidence, the results of the consultation, and the queries raised during the consultation period, which have been addressed above, it is considered that the restrictions being sought in the proposed PSPO are proportionate, necessary and reasonable.

Background to the decision

As stated above, problems with a variety of anti-social behaviours have been identified in the Hockley and surrounding area of Nottingham. The behaviour complained of is predominantly caused by individuals engaged in street drinking, which is the consumption of alcohol not within the confines of licensed premises, but out on the street or in a public place outside. This persistent problem is also associated with the congregation of groups of both males and females loitering in often large numbers in the above locations, consuming alcohol in the manner described, and engaging in anti-social behaviour. This activity has led to repeated complaints by residents, visitors to the area, business owners and their staff, and has regularly been witnessed and dealt with by uniformed Officers of the Council and Nottingham Police. The behaviour of concern ranges from alcohol fuelled aggression exhibited by and towards members of the groups congregating together and towards members of the public passing by, lewd comments being made to passers-by, the passing out of heavily intoxicated individuals on the pavements and street benches, human excrement and urine present in shop doorways and pavements, individuals walking around with soiled clothing and the presence of discarded alcohol containers, cans and bottles in the street. Street benches on Goosegate have incidentally been removed due to the above concerns. The complainants of this behaviour describe the perpetrators of such as 'street drinkers'. Most commonly this behaviour is exhibited during the day time and early evening and is not usually associated with revellers and visitors to the area's licensed premises.

The locality is known as the 'Creative Quarter' based within are numerous independent businesses, cafes, bars and restaurants, their customers outside dining in an attractive and unique part of the city centre. The area is undergoing transformation, growing its already well-established identity as a place to visit for leisure purposes; to work within its many up and coming leisure and retail businesses and just as importantly, to live. The Lace Market, in particular, offers excellent city centre residential properties available to all members of society from professionals to students. The area of Hockley and the Lace Market along with the nearby Sneinton Market, have a key role to play in both the city's day and night time economies. The unreasonable conduct is reported to be persistent in its nature and is undoubtedly having a detrimental effect on the quality of life of those in the locality. As stated above, evidence of the problem has been collected, and the existing tools available are considered to be inadequate (see 'Options Considered' above). The Council have therefore formally consulted on the proposed PSPO as stated in the 'Consultation Outcomes' above. It is considered that the restrictions being sought in the proposed PSPO are proportionate, necessary and reasonable. Evidence gathered shows that although various other measures are already in place, further action is required to tackle these ongoing and persistent problems. It is proposed that, should the PSPO be made, Community Protection Officers will be 'Authorised Persons' for the purpose of enforcement of the proposed PSPO. Similarly, Police Officers and Police Community Support Officers ("PCSOs") would also be 'Authorised Persons' and able to enforce the proposed PSPO. If the proposed PSPO is made, in order to ensure a proportionate use of the powers, it is proposed that all Authorised Persons, including Police Officers and PCSOs are trained in these powers locally by the Community Protection City Centre and Operational Support Enforcement Team. If the proposed PSPO is made, further publication will be made through the media and previously used web sites in order for awareness of the decision being made public, and signs detailing the PSPO will be installed in compliance with the 2014 Act and relevant Regulations. The cost of this signage will be met from Community Protection's existing budget. Advice will be given to partner agencies and interested parties on its enforcement. Those identified individuals who may be affected by the proposed PSPO will be made aware of its prohibitions.

Declared colleague/Councillor interests

St Ann's & Bridge Ward Councillors

Dispensation by Standards Committee

Date:	Dispensation Reference: Not Applicable
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Equalities

Has the equality impact of the decision been assessed?
YES – equality impact assessment attached

When considering a PSPO the Local Authority must have particular regard to the rights of Freedom of Expression and Freedom of Assembly set out in Articles 10 and 11 of the Human Rights Convention. The purpose of the proposed PSPO is to prevent those that are causing the evidenced ASB from continuing. It is the intention that those going about their business in a peaceful and lawful manner would not be affected by the prohibitions or the proposed PSPO. Consideration has been given to the equality impact of those that may be affected by the proposed PSPO, a copy of which is attached as Appendix 3.

Social Value Implications

The Public Services (Social Value) Act 2012 places a statutory obligation on the council when procuring services OR mixed contracts (where services is the main component of the procurement) OR a framework agreement to which the Public Contracts Regulations 2006 apply, to consider at the pre-procurement stage whether what is proposed to be procured might improve the economic, social and environmental well-being of its area and how, in conducting the procurement process, it might act with a view to achieving that objective. In identifying any social value considerations, regard should only be had to social value considerations which are relevant and proportionate to the subject matter of the contract. There is also a statutory requirement also at the pre-procurement stage to consider whether to undertake community consultation on these issues.

Crime and Disorder Implications

Section 17 of the Crime and Disorder Act 1998 places a duty on Councils to do all they reasonably can to prevent crime and disorder. The proposed PSPO would provide an additional power to deal with the behaviour identified in the Background to the Decision (above), alongside existing powers and legislation.

Section 2.6 of the Anti-Social Behaviour Crime and Policing Act 2014 Guidance for Frontline Officers July 2014 states that the Local Authority will want to satisfy itself that these powers are not being used disproportionately or in an arbitrary fashion. Clearly there should be evidence of an existing problem, with an assessment as to the likelihood that the problem will continue unless these powers are adopted and belief that the problem could be remedied by the use of these powers.

Against this background, it is possible that a single, serious incident might be sufficient to justify adoption of the powers.

The PSPO would assist the area by way of reducing and preventing criminal and anti-social acts. As identified in the main body of the report Public Spaces Protection Orders should only be made where the Council is satisfied that to do so would be a necessary and proportionate response to problems caused by the anti-social behaviour being complained of.

Officers would use any powers derived from the making of a PSPO fairly and proportionately as described above. The use of the power is a discretionary one for individual officers. Any general offences or other anti-social behaviour would be dealt with under existing legislative powers.

Published Documents

The 2014 Act
Anti-social Behaviour, Crime and Policing Act 2014 (Publication of Public Spaces Protection Orders) Regulations 2014

Home Office Guidance 'Anti-social Behaviour, Crime and Policing Act 2014: Reform of anti-social behaviour powers Statutory guidance for frontline professional' dated July 2014

Crime and Disorder Act 1998

DPPO for the Restricted Area

Exempt/Confidential report

Yes - see Exempt Appendices

Contact Person

Adrian Newbold - Enforcement Officer, ASB Team, Community Protection

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For Officer delegated decisions only please provide the reference number from the Scheme of Delegation under which the decision is being taken.

Scheme of Delegation Reference Number

127a

Corporate Director or authorised colleague (Print name)	ANDREW ERRINGTON	Date:	16/06/16 27/06/16
Signature	<i>Andrew Errington</i>		
Portfolio Holder (Print name)	NICOLA HEATON	Date:	19/06/16 27/06/16
Signature	<i>Nicola Heaton</i>		
	Date Published:	Last Date for Call-in:	
	29/06/16	06/07/16	

I HAVE SPOKEN WITH ANDREW ERRINGTON + NICOLA HEATON ON 27/06/16
AND THEY ARE STILL HAPPY FOR THIS DECISION TO BE PUBLISHED. JW 29/06/16