

**Appendix 1  
Executive Councillor**

**Open Report on behalf of Debbie Barnes, Executive Director of Children's Services**

Report to:	<b>Councillor Mrs P A Bradwell, Executive Councillor: Adult Care and Health Services, Children's Services</b>
Date:	<b>22 June 2015</b>
Subject:	<b>Proposal to consider the future of Brocklesby Park Primary School (final decision)</b>
Decision Reference:	<b>I009028</b>
Key decision?	<b>Yes</b>

**Summary:**

The proposal under consideration is the closure of Brocklesby Park Primary School with effect from 31 August 2015.

The school has a PAN (Published Admission Number) of 8 with a net capacity of 56. At the time of writing this report there were 14 pupils on roll (75% surplus capacity). There are no pupils due to start Reception in September 2015 and 2 leaving Year 6. Therefore there are 12 pupils expected to be on roll at the beginning of the next academic year (79% surplus capacity). There are not enough pupils in the local area to sustain an educationally and financially viable primary school without relying on attracting pupils from areas closer to other schools, many of which already have surplus capacity. 7 pupils (50%) that currently attend the school live outside of Lincolnshire. 11 pupils (79%) on roll at Brocklesby Park live closer to other schools, with only 3 pupils (21%) on roll living closer to Brocklesby Park than any other school.

Following careful consideration of how to secure a viable future for the school, the Governing Body of Brocklesby Park Primary School made the difficult decision in November 2014 to request that the Local Authority (LA) start the consultation process on the proposal to close the school. A copy of the letter from the Governing Body is attached as Appendix A.

The decision of the Governing Body to request that the LA consult on closure was taken in the context of concern over the long term sustainability of the school in relation to being able to continue to offer quality education to pupils with the resources available. Low pupil numbers in the local area and the extremely low current and projected numbers on roll do not allow the Governing Body to set a balanced budget that can continue to provide the breadth and quality of provision that children are entitled to.

It is the LA's statutory duty to ensure that there are sufficient school places to accommodate all pupils of statutory school age across the county of Lincolnshire. The LA must consider its duty to promote high educational standards, ensure fair access to educational opportunity and promote the fulfilment of every child's educational potential and balance this with the aim of enabling children to take up a school place within their local community.

The LA is co-ordinating the process following statutory guidelines published in The Department for Education (DfE) guide "School Organisation Maintained Schools Guidance for proposers and decision-makers" January 2014 (with attached Annex A and B) in accordance with the terms of the Education and Inspections Act (EIA) 2006 as updated by the Education Act 2011("the Statutory Framework").

On 19 November 2014 an eight week period of consultation commenced which closed on 16 January 2015 and is further referred to later in this report in the Consultation section. A summary of written responses received is also attached in Appendix B. Following the responses received the LA extended the timescales for the first stage of the process to allow more time for the Governing Body and the LA to ensure that all alternatives to closure have been considered prior to progressing to the next stage. LA officers contacted every Trust on the list of DfE approved sponsors to explore the possibility of Brocklesby Park becoming an academy within a Multi-Academy or Umbrella Trust. This resulted in one Multi-Academy Trust expressing an interest in the school joining their Trust. The LA has continued to support the school and the Governing Body in pursuing this option in parallel with the statutory process.

Following the consultation period the decision was taken on 26 March 2015 to proceed with the publication of a Statutory Notice. This notice was published on 24 April 2015 and initiated a four week Representation Period up to 22 May 2015 when written objections and comments may be submitted. The process is now entering the final stage when the LA, as decision maker, must take the final decision regarding the proposal within 2 months of the end of the Representation Period (by 22 July 2015).

This report seeks to advise the Executive Councillor on making the final decision regarding the closure of Brocklesby Park Primary School.

**Recommendation(s):**

That the Executive Councillor approves the proposal to close Brocklesby Park Primary School with effect from 31 August 2015.

**Alternatives to Closure Considered:**

1. **For the LA to retain Brocklesby Park Primary School as it is at present and not to close the school.**

This alternative would have the following advantages:

- A site would be retained within the local community for educational and community purposes.
- Pupils on roll at the school would not have to move to another school.
- This would enable a number of children to attend a school without the need for transport but this number would be very small.
- This would avoid the need for staff redeployment and potential redundancies.

However, the above alternative would have the following disadvantages:

- The school is not financially viable in the short or long term. Schools are not legally allowed to set a deficit budget without a realistic, viable and evidence based business plan showing how the situation will be reversed.
- There would remain an unacceptable level of surplus places which is currently 75% and is likely to increase from September 2015.
- The school was rated by Ofsted at the last full inspection in 2013 as Requires Improvement. The school was below floor in 2014 but there were only 5 pupils in the cohort. The School Improvement Service (CfBT) has advised that if inspected this term, current rates of pupil progress indicate good achievement and support a good judgement. However, this position could change in September with changes in staff and if all Key Stages are taught in one class. Continued low pupil numbers will make it challenging to maintain and improve standards.
- There would be concerns over the impact on the quality of the education and development of the children with such small year group numbers which may lead to one class covering all year groups in an attempt to reduce costs if pupil numbers do not increase. The school currently operates with two classes, but CfBT advises that this would be much more difficult with one class and would present significant challenges in meeting Early Years requirements and the new National Curriculum.
- With regard to the quality of teaching at Brocklesby Park; although CfBT has recognised the improvement in provision this year further work is still needed with regard to assessment in all Key Stages to ensure that teaching is consistently high and matched to the needs of all pupils. CfBT also has concerns over the school's vulnerability due to ongoing staff mobility whilst the future of the school remains uncertain. The Key Stage 2 teacher is leaving at the end of this academic year which will present significant challenges in developing leadership beyond the Headteacher and also in appointing, training and supporting another teacher to manage a class which incorporates the whole of Key Stage 2, and could lead to a single class including the whole primary age range from 4 to 11 years.

- With such low pupil numbers it would be extremely challenging to provide a wide and diverse curriculum and would limit the range of opportunities available for all pupils both for their academic and social development. For example it is difficult for such a small school to provide team game experiences and participation in choirs, orchestras and drama productions that are possible for children at larger schools. The children are therefore likely to receive a more rounded education in a larger local school (some of which will still be small rural schools, but not as small as Brocklesby Park) with greater social interaction opportunities.
- There are significant difficulties in attracting, recruiting and retaining high quality qualified teachers to a school with such low numbers and limited career opportunities. The current staffing structure comprises two newly appointed members of staff with one being a full time Newly Qualified Teacher (NQT) and the other a temporary member of staff employed part time (0.6) in addition to the Headteacher. This places high demands on the Headteacher in supporting and quality assuring staff.
- The current Leadership and Management structure would continue. There are concerns that there is no middle leadership in place because the teaching team is small, relatively new and not yet established. The school had started to develop this area this year by training a member of staff. However this member of staff is leaving which will mean that leadership capacity beyond the Headteacher will again be limited. Ideally the school will need to replace that member of staff and address the middle leadership concern by appointing a teacher with a high level of skills and experience. However, given the current recruitment challenges and threat of closure it will be difficult to make an appointment that will be immediately able to teach the age range and contribute to leadership. Also, although the Governing Body has reconstituted and now provides a good range of skills, their understanding of pupil progress and quality of teaching needs securing so that effective challenges can be presented by the governors. Governance has improved with governors active in school and being well informed about pupil progress but governors' recent focus has been concentrated on keeping the school open. Should the academisation application be successful TMAT has offered to support and strengthen governance through a co-opted governor.
- The funding required to provide ongoing support to Brocklesby Park would represent a disproportionately high distribution of public funding and could have a negative impact on the distribution of funding to other local schools and potentially their future sustainability. Ensuring sustainability is vital in that it has an impact on recruiting and retaining staff of a high calibre in the area.
- The school will continue to be vulnerable given the number of current and projected primary aged pupils in the area. This continued uncertainty might also lead to parents seeking places at another more sustainable and educationally viable school resulting in even fewer pupils on roll and

consequently less funding as funding is directly related to the number of pupils on roll.

- The Governing Body has pursued federation options to enable the school to continue but these have not produced a potential successful alternative.

## **2 For the Executive Councillor to approve the closure of the school with an implementation date of 31 August 2016.**

When the consultation process commenced in November 2014 the proposal was to consider the closure of the school with an implementation date of 31 August 2015. In any proposal regarding the closure of a school it is important that there should be no undue delay in its implementation following the closure decision to avoid as far as possible further negative impact on the pupils, their families and the local community who will already be affected by the closure.

However, it is also important that all options are fully explored and DfE guidance states that in the case of the closure of a rural school the decision maker must carefully consider any alternatives to the closure of the school.

As detailed above, in the Summary, the academisation of the school as an alternative to closure became a possibility during the consultation process. Tollbar Multi Academy Trust (TMAT) was the only potential academy sponsor that expressed an interest in supporting the school. An application to convert to Academy status by joining the TMAT was turned down by the Regional Schools Commissioner (RSC) in March 2015 after taking advice from head teacher board (HTB) members. The RSC confirmed that the decision not to approve academy conversion was predominantly related to the low pupil numbers (Appendix D). However, the Governing Body are proposing to re-submit an application to the RSC following a more detailed case for consideration with material changes from their original submission. Their proposal is included as Appendix C. There is not sufficient time for this to be resubmitted before the end of this academic year and will only be possible if the proposal to close the school has an implementation date of 31 August 2016.

The Governing Body has submitted a response in the Representation Period. The response reaffirms the governors' commitment to try to keep the school open, to continue to pursue the application for academy status and requests a delay in the final decision to assist with this.

The Governing Body understands that in its current form the projections indicate unsustainability in both educational and financial terms. However, the Governing Body believe that as an Academy under TMAT the school will not remain in its current form and the application should be reconsidered by RSC for the following reasons:-

- The Governing Body believes that the proposal to join TMAT would enable the school to access the Trust's pooled financial and educational resources and that this would assure immediate educational viability and sustainability. TMAT will take control of staffing with a view to deploying appropriately qualified staff across all its constituent academies in ways that secure cost efficiency and excellence. TMAT will assume joint control of finance and administration along with responsibility for school improvement.
- It is proposed that the addition of Early Year's provision will increase pupil numbers and additional income.
- TMAT will use its expertise and resources to organise publicity campaigns and organise transport from villages across county borders to increase pupil numbers beyond those planned by the school's early years' proposal.
- Lord Yarborough, a governor of the school and landowner of the school playing field, has agreed to provide finances for the school to guarantee a balanced budget over the next two academic years.
- The firm commitment of TMAT to reapply for academy status and incorporation within TMAT in the next six months during which time the school will be treated as a partner school and benefit from the support of the Trust.

However, the LA has the following concerns regarding the resubmission of the application which would require the closure date to be delayed until 2016:-

- The main priority of the LA is to ensure the quality of provision at the school to which all children are entitled and the consultation on closure was commenced in the context of this concern. TMAT has confirmed that it "will use its best endeavours to ensure a full, broad and balanced educational experience for all pupils at the school". The LA must be assured that joining the Trust will guarantee the quality of provision and consider whether this is a better option for each child than attending an established local school.
- The LA has concerns about the potential negative impact on the quality of education should the Early Year's provision be provided by existing staff at the school as indicated in the school's business plan. This would place increasing pressure on staff already working hard to meet Ofsted's requirements. The proposal also potentially combines the pre-school with Reception and Year 1 pupils all in one class which is not considered best practice and might inhibit children reaching their full potential.
- The increased numbers anticipated by the school and Governors and on which the budget is based are optimistic rather than evidence based. For example the survey carried out by the school predicts an intake of 2 in 2015 with a total Number on Roll (NOR) of 15 but it is now evident that there will be no Reception children starting at the school in September

2015 resulting in a total NOR of 12. However attractive to parents the school may become the projections confirm that the numbers of primary aged children required will not be present in the locality and any successful business plan is based on the reliance on attracting pupils that live closer to other schools.

- Should the publicity campaign be successful with an academy sponsor, thus increasing the NOR, it is still likely that the school will always be a small school with a higher than average cost per pupil which does not represent best use of resources for Lincolnshire's Dedicated Schools Grant (DSG). This can therefore have an impact on the funding for all children in Lincolnshire.
- There is no evidence to prove that the numbers of children required to ensure the viability of the Early Year's provision will actually take up a place, and having done so whether they will stay at the school for their primary education. LA officers within the Early Year's team have confirmed that from a sufficiency perspective there is no need for additional Early Years places in the locality. Sufficiency of Early Year's provision is reviewed annually across the county; the most recent information collected for this area suggests that there is sufficient provision available therefore any new setting would not be sustainable or viable. On this basis LA officers within the Early Year's team have confirmed that from a sufficiency perspective there is no need for additional Early Years places in the locality. Any requests for provision from parents in the area would be monitored, recorded and reviewed annually as part of the annual sufficiency assessment planning process.
- The officers within the Early Year's service have concerns that the business plan is not sustainable or realistic as it appears to be based upon attracting children from outside of the immediate community. This would only be acceptable and sustainable if alternative provision was not available for the families in surrounding communities; however this is not the case. LA officers are not able to support the business plan as we do not hold any information which is able to substantiate a demand for places to the level which is proposed without having negative impact on other provision in the area and the LA is not be able support this approach.
- The number on roll (NOR) at the October census determines the funding received from Lincolnshire County Council (LCC) for the financial year beginning in the following April. The budget forecasts produced by the Governing Body are likely to be based on optimistic estimates with the potential result that the predicted deficit figures are likely to be higher than anticipated and it may take longer than estimated to reach a balanced budget. This would be compounded if, in addition to lower numbers for statutory aged children, the actual number of pre-school children is also lower than predicted.

- The application states that Lord Yarborough will provide finance to guarantee a balanced budget. However, this contribution is capped to £25,000 which in light of the above points may not be sufficient to balance the budget even after just one academic year if the pupil numbers do not improve. From a high level review of the school's Income and Expenditure and medium term finance plan, LA officers have estimated that the deficit could be in excess of £50,000 by the end of the 2016/2017 financial year should the position not materially change. If the academisation application is unsuccessful and the school have to close in 2016 any shortfall would be at the risk of the LA.
- The RSC recognises that joining TMAT would allow the school to benefit from greater economies of scale and would strengthen the educational expertise available to the school. However, the main reason for the RSC rejecting the application is the very low current and projected NOR. In their decision the RSC has already taken into consideration adding Early Year's provision and potential increased future predictions (up to 38 on roll). A copy of the letter confirming the decision of the RSC is attached as Appendix D. The Governing Body wish to resubmit the application on the basis that the school will no longer be in its current form and that there are material changes to the original application. It is not appropriate for the LA to predict the decision making of the RSC but it is unlikely that the application will indicate a sufficiently large enough increase in the potential NOR to affect the reasoning behind the RSC's rejection of the original application. The NOR in September 2015 will actually be lower than that expected when the original application was submitted to the RSC.
- The application recommends the installation of a mobile unit to house the Early Year's provision which would require the use of the school's Devolved Formula Capital (DFC). The LA must consider the implications of this should the school close in 2016 and whether this would represent best use of taxpayers' money in the event of a further academy application being unsuccessful.

**Reasons for Recommendation:**

- There has been a changing age profile of the rural population in recent years resulting in a trend towards lower numbers of families with primary age pupils choosing to live in small rural communities. There are no longer sufficient pupil numbers in the immediate area for a viable stand-alone school to remain educationally and financially sustainable.
- To reduce any detrimental effect on educational standards that can potentially occur at schools with very low numbers on roll. There are currently only 14 pupils on roll, projected to fall to 12 next academic year. To keep the school open would mean children continuing to attend a very small school and consequently placing greater demands on a small number of staff to adequately deliver the full curriculum entitlement. The staffing structure would have to reduce further to stand any chance of

setting a balanced budget with the current number of children on roll. Continued low pupil numbers will mean that the school would be unlikely to be able to generate the budget to maintain the high standard of education that all pupils are entitled to.

- To enable pupils to receive a more rounded education in a larger school (some of which will still be small rural schools, but not as small as Brocklesby Park) offering greater social interaction.
- To reduce the incidence of teaching several year groups in one class and in groups that involve teaching across more than one Key Stage. To keep the school open, the low numbers on roll may require a school organisation based on teaching all 7 year groups within one class which is not considered to be in the best interests of the children, and CfBT advise that this would present significant challenges in meeting Early Years requirements and the new National Curriculum.
- To reduce surplus capacity in the area but still provide sufficient places to meet local needs and parental preference. This decrease in surplus capacity contributes to ensuring the provision of sustainable schools across the county allowing future investment to be used more effectively to support schools in raising standards through a more efficient use of resources.
- To enhance the future sustainability of the remaining primary schools in the local area, including other small rural schools. Ensuring sustainability is vital in that it has an impact on recruiting and retaining staff of a high calibre in the area and also attracting future investment.
- To improve value for money delivered by larger schools. Very small schools require a disproportionate amount of funding. The sparsely populated county of Lincolnshire makes it necessary to sustain small schools to meet the needs of local communities across wide rural areas, and the LA's funding formula supports this. However, when numbers fall as low as they are at Brocklesby Park the situation becomes unsustainable for a stand-alone school of this size. Schools are not legally allowed to set a deficit budget without a realistic medium term plan showing how the deficit will be turned around.

## **1. Background**

This report is written in the context of concern over the long term sustainability of the school. Despite the hard work of Governors to market the school the numbers have remained low. The number of children who live local to the school is not sufficient to support a sustainable stand-alone primary school.

To remain viable the school needs to increase the NOR by attracting pupils from further away than what would be considered the 'natural catchment area'. There

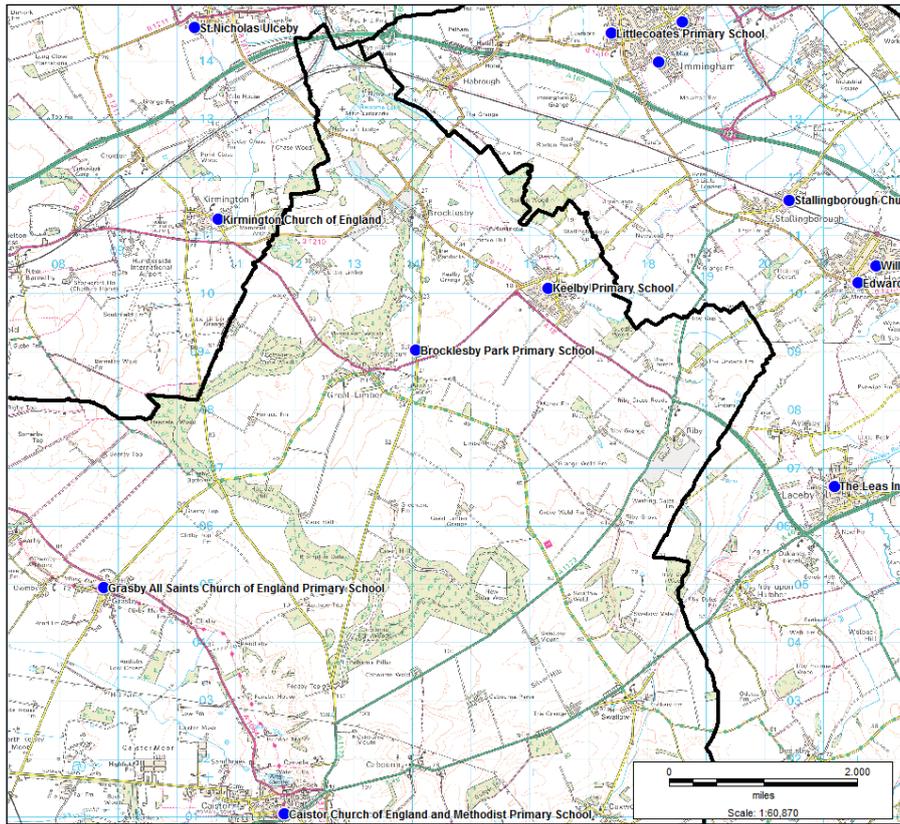
are currently 14 pupils on roll at the School which has a potential capacity for 56, leaving 75% surplus capacity. 7 pupils (50%) that attend the school live outside of Lincolnshire. 11 pupils (79%) on roll live closer to other schools, with only 3 pupils on roll living closer to Brocklesby Park than any other school.

Applications received by the LA for 2015/16 Reception places resulted in 24 pupils being offered places at Keelby Primary School for September 2015, leaving 8 available places in the area for that year group. Keelby Primary School has confirmed that they could accommodate all pupils currently on roll at Brocklesby Park. Neighbouring LAs have confirmed that were the school to close there is surplus capacity to accommodate the children from Brocklesby Park at neighbouring out of county schools that are the closest schools for some of the pupils on roll at Brocklesby Park. The admissions process for the September 2015 Reception intake received only 1 first preference application for Brocklesby Park. However since offering the place to the applicant they have turned it down and applied elsewhere. Therefore, with 2 Year 6 children due to leave at the end of the summer term, the expected NOR at September 2015 is 12.

The school undertook a survey with parents to assess potential sibling and first child intakes. The results were as follows:-

2015 = 2 (Total NOR = 15) [Note there are now no pupils due to start in September]  
2016 = 6 (Total NOR = 18)  
2017 = 7 (Total NOR = 21)  
2018 = 4 (Total NOR = 22)  
2019 = 3 (Total NOR = 23)

However, the Office of National Statistics (ONS) birth data and LA projections (using birth data, GP registrations and historic pupil movement in and out of the area) indicate continued low numbers in future years as detailed on the following page. The map below shows the school in relation to the local area and neighbouring schools, with Keelby Primary School being the closest school, 1.8 miles away:-



LA Projections for Brocklesby Park (Based on 2014 May School Census):

	2013/14 (Actual on Roll)	Yr 1 - 2014/15	Yr 2 - 2015/16	Yr 3 - 2016/17	Yr 4 - 2017/18
Age 4 (Reception)	1	2	3	1	1
Age 5 (Y1)	3	1	2	3	1
Age 6 (Y2)	2	3	1	2	3
Age 7 (Y3)	0	2	3	1	2
Age 8 (Y4)	4	0	2	3	1
Age 9 (Y5)	2	4	0	2	3
Age 10 (Y6)	5	2	4	0	2
Total On Roll	17	14	15	12	13

LA projections factor in recent migrational trends, any new housing development in the local area, ONS Birth Data and historic birth patterns to project future intakes based on a continuation of recent trends over the last 3 years. They do not take into account potential changes in parental preference.

2014 ONS Birth Data – Cohort size for Brocklesby Park local area:  
(Pupils with Brocklesby Park as nearest school)

Intake year	Rec 2014	Rec 2015	Rec 2016	Rec 2017
Cohort Size	0	1	2	2

NHS GP registrations with Lincolnshire and NE Lincs GPs show the following cohort sizes per year group for the Brocklesby Park local area:

Intake year	Rec 2014	Rec 2015	Rec 2016	Rec 2017
Cohort Size	n/a	0	2	2

In order to secure an educationally and financially viable future it is vital that more pupils need to attend the school than are currently projected to do so. It is evident that the only way that a sufficient NOR will be achieved is by attracting more pupils from outside of the local area away from other schools that they live closer to.

### **Reaching the decision – Preliminary Considerations**

The requirements for decision making relating to school organisation in LA Maintained schools are set out in Annex B of the guide “School Organisation Maintained Schools January 2014” published by the DfE.

The DfE does not prescribe the exact process which a decision maker should follow but the decision maker must have regard to this guidance. The decision maker should consider the views of those affected by the proposal and should not simply take account of the numbers of people expressing a view but give greatest weight to those stakeholders most likely to be affected and especially the parents of children at the school concerned.

#### **Factors to be considered by the Decision Maker**

##### *The Consultation and Representation Period*

The Executive Councillor must be satisfied that the appropriate consultation and representation periods have been carried out and that all of the responses received have been given due consideration.

Although there is no longer a prescribed consultation period prior to the publication of the Statutory Notice and Complete Proposal the DfE's guidance states "*a strong expectation on schools and LAs to consult interested parties in developing their proposal prior to publication*" and for proposed school closures a minimum of 6 weeks is recommended. The LA conducted an eight week period of consultation to fulfil this expectation and also to operate a fair and open process and ensure all views were considered. A Statutory Notice (Appendix E) and Complete Proposal (Appendix F), initiating a four week Representation Period, were published in accordance with current statutory requirements.

In addition, following the written responses received in the consultation period and the questions and comments raised at the public meeting the LA extended the initial timeline for the overall process by approximately 7 weeks to allow more time for the Governing Body and the LA to ensure all alternatives to closure were considered prior to progressing to the Statutory Notice stage.

Responses submitted during both the Consultation and Representation Period have been made available to the Executive Councillor for consideration when taking the final decision and further details of these responses are provided in section 5 of this report (**Consultation**).

### *Education standards and diversity of provision*

The Executive Councillor should consider the quality and diversity of schools in the area and be satisfied that the proposal will meet the aspirations of parents, contribute to raising local standards of provision and lead to a closing of attainment gaps. The Government's aim is to create a more diverse school system offering excellence and choice so that every child receives an excellent education whatever their background and wherever they live.

The LA has carefully considered the impact on educational standards and believes that the closure of the school has the potential to protect and improve educational standards overall. To keep the school open may have a detrimental effect in that it would mean children continuing to attend a very small school and consequently placing greater demands on a small number of staff to adequately deliver the full curriculum entitlement. To keep the school open, the low numbers on roll may require a school organisation based on teaching all 7 year groups within one class, which is not considered to be in the best interests of the children. Provision at neighbouring schools is rated by Ofsted more highly than that at Brocklesby Park which was rated as Requires Improvement with the two closest Lincolnshire schools being rated as "Good" at their last inspections.

Low pupil numbers in the local area and the extremely low current and projected numbers on roll do not allow the Governing Body to set a balanced budget that can continue to provide the breadth and quality of provision that children are entitled to. The LA believes that this proposal provides the best option to maintain and improve standards of attainment with an enhanced quality of education for current and future children in the area whilst maintaining diversity.

### *Demand*

The Executive Councillor must consider the evidence presented for the need for places but also a decision must take into account parental preference and evidence of parents' aspirations for places in the locality together with the quality and popularity of schools in the area that have surplus capacity. The DfE recognises that for parental preference to work effectively there may be some surplus capacity in the system overall but that competition for places to be taken up will lead to existing schools improving standards.

As fully explained in the Background section above the number of children who live local to the school is not sufficient to support a sustainable stand-alone primary school. LA projections (using birth data, GP registrations and historic pupil movement in and out of the area) indicate continued low numbers in future years.

Neighbouring schools in the area have available spaces and if the closure goes ahead the LA will offer all displaced pupils a place at the nearest neighboring school, Keelby Primary School, Manor Street, Keelby Grimsby DN41 8EF. There is sufficient capacity at Keelby Primary School for all displaced pupils and there will be no requirement to increase the number of school places available as a consequence of the proposed discontinuance of Brocklesby Park.

### *School size*

Assumptions that schools should be of a certain size to be a good school should not be made although the viability and cost-effectiveness of a proposal is an important factor in the decision-making process eg the impact on a LA's budget to provide additional funding to a small school to compensate for its size.

Very small schools require a disproportionate amount of funding. The sparsely populated county of Lincolnshire makes it necessary to sustain smaller schools to meet the needs of local communities across wide rural areas, and the LA's funding formula supports this. However, when numbers fall as low as they are at Brocklesby Park the situation becomes unsustainable for a stand-alone school of this size. The school is not financially viable in the short or long term. Schools are not legally allowed to set a deficit budget without a realistic, evidence based medium term plan showing how the deficit will be turned around.

### *Proposed admission arrangements*

Before approving any proposal that is likely to affect admissions the LA must ensure that all admissions are compliant with the School Admissions Code. If the closure goes ahead the LA will offer all displaced pupils a place at a Lincolnshire school. Admission arrangements for the academic year commencing September 2016 and subsequent intakes will be processed in accordance with the School Admissions Code.

### *National Curriculum*

All maintained schools must follow the National Curriculum unless they have secured an exemption. If the closure goes ahead, children will be offered places at alternative neighbouring schools which all currently follow the National Curriculum and will continue to do so.

### *Equal Opportunity*

The LA must have 'due regard' to the need to eliminate discrimination, advance equality of opportunity and foster good relations and should consider whether there are any sex, race or disability discrimination issues that arise out of the proposed expansion. There should be a commitment to provide access to a range of opportunities which reflect the ethnic and cultural mix of the area while ensuring that such opportunities are open to all.

There are no sex, race or disability discrimination issues arising from this proposal. The LA will continue to be committed to provide access to a range of opportunities which reflect the ethnic and cultural mix of the area while ensuring that such opportunities are open to all.

Further reference is made to the LA's obligations in this regard later in this report under "*Further legal considerations*".

### *Community Cohesion and Community Services*

The impact on the community must be considered and schools have a key part to play in providing opportunities for young people from different backgrounds to learn from and respect each other and gain an understanding of other cultures, faiths and communities. The decision-maker must take account of the community served by the school and the views of different sections of the community.

If the school closes there would be the inevitable disruption for pupils, parents and staff, but this would be short term. This proposal would address the issues surrounding a declining primary school population in an area where there are other appropriate schools in more densely populated areas with sufficient capacity to accommodate displaced pupils. The County Council believes that this proposal provides the best solution to addressing and meeting the long term educational and social needs of the children in the area if it is not possible to sustain a viable school in Brocklesby Park.

An educational site would no longer provide services for children and young people. The LA understands that the school is an important part of the community, not just as a school but as a facility used by other members of the public. The County Council would work with the local community to try to ensure that the impact of this proposal would be mitigated.

Alternative community uses for the school building would be considered prior to any decision being made about the future of the premises.

The small size of the school limits its ability to offer a wide range of extended services which are likely to be more readily and widely available at neighbouring schools with a larger NOR. Extended services currently provided at Brocklesby Park Primary School are already in existence at other neighbouring schools. Brocklesby Park has an after school club for sport one day a week and some children access recorder lessons after school one day a week. A breakfast club will run if demand requires it. The school has held drama or craft clubs in the past but none are running presently. Keelby Primary School has a before and after school club on site Monday – Friday. In addition there are a variety of clubs most afternoons and also one on a Monday morning.

The LA has a good track record of redeployment of staff and will always seek to avoid redundancy not only to mitigate costs but also to reduce the human costs of redundancy.

### *Travel and accessibility*

The Executive Councillor should be satisfied that accessibility planning has been properly taken into account and that proposed changes do not adversely impact on disadvantaged groups. Proposals should not unreasonably extend journey times or increase transport costs or result in too many children being prevented from travelling sustainably due to unsuitable walking or cycling routes. The proposal should be considered on the basis of how it will support and contribute to the Council's duty to promote the use of sustainable travel and transport to school.

The LA has considered the impact on transporting pupils to other schools should Brocklesby Park close. Many of the pupils who currently attend Brocklesby Park live closer to other local schools and it is not expected that the closure would significantly increase the number of car journeys to transport children to and from school. If all pupils currently on roll at Brocklesby Park went to their nearest local school then the combined distance of all pupils would be nearly half of what it is now. Were the school to close then transport would be offered according to LCC's school transport policy taking advantage of the established routes already in use in the area. It is not expected that costs would increase significantly even if all parents chose to take up the transport offer.

The County Council home-to-school transport policy will continue to apply - this provides free home-to-school transport for Lincolnshire resident pupils to their nearest or designated school (if it is more than 2 miles away for primary age pupils). In addition, arrangements will be made to allow displaced Lincolnshire resident children whose parents select the receiving school named above, and who live within the current designated transport area for Brocklesby Park Primary School, to have free transport to Keelby Primary School if the school is more than 2 miles from the family's home. Non-Lincolnshire resident children may be offered transport should it be appropriate to do so following discussion with the parents on a case by case basis.

### *Capital*

There are no capital costs arising out of the proposed closure of the school. However should the school close the LA would consider alternative uses for the premises and the land would revert to the landowner. Should the premises be found to be surplus to requirements this may lead to some capital receipts.

### *Rural Schools*

Under current DfE guidance there is a presumption against the closure of rural schools. This does not mean that a rural school will never close, but that the case should be strong and a proposal clearly in the best interests of educational provision in the area. In order to consider the proposal to close the school the LA has paid particular attention to the following points:-

- The likely effect of the closure of the school on the local community:

The school currently provides places for only 3 pupils from the local community. The school is not in the centre of the village it serves (Great Limber). It is located 0.7 miles out of the village which is a 10-15 minute walk. The LA understands that the school is regarded by the local community as an important facility and members of the local community believe it would have a negative impact if the school were to close. The LA would work with the local community to try to ensure that any negative impact on the community from the loss of the school would be mitigated through partnership working with other services and schools in the area and reduce any negative impact on community cohesion were the school to close.

- Educational standards at the school and the likely effect on standards at neighbouring schools:

The closure of a school can potentially reduce extended services on offer. However, in this case, the small size of the school limits its ability to offer a wide range of extended services which are more readily and widely available at neighbouring schools with a larger NOR. It is also challenging to demonstrate the impact on educational standards with such a small cohort. In their current school pupils are required to mix across multiple year groups. Neighbouring schools are regarded by Ofsted and the LA as being of an equal or higher standard. Standards at neighbouring schools would not be expected to be negatively affected by taking on pupils from Brocklesby Park.

The LA has carefully considered the impact on educational standards and believes that the closure of the school has the potential to protect and improve educational standards. To keep the school open may have a detrimental effect in that it would mean children continuing to attend a very small school and consequently placing greater demands on a small number of staff to adequately deliver the full curriculum entitlement. To keep the school open, the low numbers on roll may require a school organisation based on teaching all 7 year groups within one class, which is not considered to be in the best interests of the children. Provision at neighbouring schools is rated by Ofsted more highly than that at Brocklesby Park (Requires Improvement at the last full inspection in 2013) with the two closest Lincolnshire schools being rated as "Good" at their last inspections.

- The availability, and likely cost to the LA, of transport to other schools and any increase in the use of motor vehicles which is likely to result from the closure of the school, and the likely effect of any such increase:

The LA has considered the impact on transporting pupils to other schools should Brocklesby Park close. Many of the pupils who currently attend Brocklesby Park live closer to other local schools and it is not expected that the closure would significantly increase the number of car journeys to transport children to and from school. If all pupils currently on roll at Brocklesby Park went to their nearest local school then the combined distance of all pupils would be nearly half of what it is now. Were the school to close then transport would be offered according to LCC's school transport policy taking advantage of the established routes already in use in the area. It is not expected that costs would increase significantly even if all parents chose to take up the transport offer.

- Any alternatives to the closure of the school:

The Governing Body, supported by the LA, has pursued potential alternatives to closure in recent years but despite the hard work to market the school the numbers have remained low. Following the request of the Governing Body to commence the closure process and comments raised during consultation the LA has given further consideration to all potential alternatives to closure. The three main alternatives which have continued to be pursued in parallel with the closure

process are the possibility of federation with another school, academisation within a Multi-Academy Trust and/or the introduction of Early Years provision at the school which are all discussed more fully below in the Consultation section.

### *Further legal considerations*

#### **Equality Act 2010**

Apart from its obligations to consider the statutory guidance referred to the Council also has obligations under the Equality Act 2010 which must be taken into account by the Executive when coming to a decision.

The Council must, in the exercise of its functions, have due regard to the need to:

(1) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010

(2) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This involves having regard to the need to:-

- remove or minimise disadvantages suffered by persons who share a relevant characteristic that are connected to that characteristic
- take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.
- encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

(3) foster good relations between persons who share a relevant protected characteristic and persons who do not share it: Equality Act 2010 s 149(1). The relevant protected characteristics are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation: section 149(7). This involves having due regard to the need to tackle prejudice and promote understanding.

The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

Compliance with the duties in this section may involve treating some persons more favourably than others.

A reference to conduct that is prohibited by or under this Act includes a reference to:

- (a) A breach of an equality clause or rule
- (b) A breach of a non-discrimination rule

It is important that the Executive is aware of the special duties the Council owes to persons who have a protected characteristic as the duty cannot be delegated and must be discharged by the Executive. The duty applies to all decisions taken by public bodies including policy decisions and decisions on individual cases and includes this decision.

To discharge the statutory duty the Executive must analyse all the relevant material with the specific statutory obligations in mind. If a risk of adverse impact is identified consideration must be given to measures to avoid that impact as part of the decision making process.

The LA is well aware of the potential negative impact that may arise out of the closure of the school and this is considered more fully in the Impact Assessment (Appendix G) together with measures that could be taken in mitigation. However, the impact of closure would be felt by all the pupils and all local children and their parents, the community and all staff, and would not discriminate against anyone sharing a relevant protected characteristic. The Council believes that this proposal will not lead to any discrimination and that in recommending the proposal the Council is having due regard to its obligations under The Equality Act.

### ***Child Poverty Strategy***

The Council is under a duty in the exercise of its functions to have regard to its Child Poverty Strategy. Child poverty is one of the key risk factors that can negatively influence a child's life chances. Children that live in poverty are at greater risk of social exclusion which, in turn, can lead to poor outcomes for the individual and for society as a whole.

In Lincolnshire we consider that poverty is not only a matter of having limited financial resources but that it is also about the ability of families to access the means of lifting themselves out of poverty and of having the aspiration to do so. The following four key strategic themes form the basis of Lincolnshire's Child Poverty strategy: Economic Poverty, Poverty of Access, Poverty of Aspiration and Best Use of Resources.

The closure of the school would support the strategy as follows:-

- By reducing any detrimental effect on educational standards that can potentially occur at schools with very low numbers on roll. The LA believes that the proposal provides the best option to maintain and improve the quality of educational provision that all children are entitled to. This is likely to improve their sense of achievement which in turn can improve personal aspiration.
- The closure would avoid a disproportionately high distribution of funding into one school resulting in a better use of resources to the benefit of all the children of Lincolnshire.

- The closure of the school and consequent reduction in surplus capacity in the area will contribute to the future sustainability of other local schools to the benefit of all children within the locality.

### ***Joint Strategic Needs Assessment (JSNA) and Health & Well Being Strategy***

The Lincolnshire JSNA identifies a number of needs that directly relate to young people. (Be Healthy; Stay Safe; Enjoy and Achieve; Positive Contribution; Achieve Economic Wellbeing).

The Lincolnshire Health & Well Being Strategy includes five main themes, with an additional theme of "mental health" running throughout the document. The planned service provision in the county supports the themes of Promoting healthier lifestyles; Improving health and social outcomes for children and reducing inequalities; and Tackling the social determinants of health.

The closure of the school would support both the JSNA strategy and the Lincolnshire Health & Well Being Strategy as follows:-

- The children are likely to benefit from a more rounded education in a larger school with greater social interaction.
- The small size of the school limits its ability to offer a wide range of extended services which are likely to be more available at schools with more pupils on roll and which the children will benefit from.
- The children are likely to achieve higher standards of attainment and promote the fulfilment of each child's potential. This will assist in improving their sense of achievement which in turn can improve personal aspiration.
- Factors which support children reaching their full potential will also promote their ability to achieve economic well-being and the positive contribution they can make.

## **2. Conclusion**

The final decision is required from the Executive Councillor to determine whether to support the recommendation within this report.

The reasons on which the final decision is based are detailed earlier in this report in the "**Reasons for Recommendations**" section. The factors to consider in making this decision are within this report and all valid written responses received during consultation (summarised in Appendix B) and the Representation Period (see section 5 **Consultation** for further details) must be considered.

The LA believes that this recommendation is made in the best interests of local children and local parents as well as educational provision in the area whilst also enabling the LA to fulfil its statutory duty of ensuring that there are sufficient places to accommodate all pupils of statutory school age in Lincolnshire.

### **3. Legal Comments:**

The Council has the power in accordance with the statutory provisions to propose the closure set out in the Report subject to following the statutorily prescribed process including all consultation requirements. In arriving at the recommendation a non-statutory consultation process has been undertaken which has taken into account statutory guidance. The Executive Councillor must take into consideration all matters which are required by the Statutory Framework in particular those considerations specific to rural schools and the consultation responses must be conscientiously taken into account in reaching a decision.

The Executive Councillor must also take into account the duty under Section 149 of The Equality Act 2010 (the public sector equality act) in reaching a decision on the proposal.

It would be lawful for the Executive Councillor to make a decision in accordance with the recommendation.

The proposal is consistent with the Policy Framework and within the remit of the Executive Councillor.

### **4. Resource Comments:**

Brocklesby Park Primary School is not a financially viable school when considering the current pupil numbers and those projected in the future. Schools with very low pupil numbers create a higher than average cost per pupil, which does not represent the best use of resources for Lincolnshire's Dedicated Schools Grant.

External funding of £25,000 has been identified to support the schools planned funding shortfall in the short-term, however within its financial planning, the school has also speculated addition funding through the creation of the early years provision to make the school financially viable. There is however no evidence that this will achieve financial sustainability for the school.

Schools are not legally allowed to set a deficit budget without a realistic and evidence based business plan. A decision to delay the school closure by one year and allow the school to implement the seemingly optimistic plan will result in an overspend where it is not achieved, which would then likely fall with the Local Authority.

### **5. Consultation**

In order for the school to close the LA must follow the necessary statutory legal processes as required by the Secretary of State in accordance with the EIA 2006, the Education Act 2011 and the guidance of the DfE regarding expansion

Under these guidelines the LA must ensure that sufficient time and information are provided for people to understand and form a view on the proposal and make a

response. Under the DfE guidelines which came into effect in January 2014 there is no longer a prescribed consultation period for proposed school closures although a minimum of 6 weeks is recommended. To comply with this the LA has conducted an eight week period of consultation. Any documentation issued must set out the problem that is being addressed and invite comment on one or more solutions. The LA must explain the decision making process and take all reasonable steps to draw the proposal to the attention of all those who might be interested and take into account their views.

The guidance issued by the DfE in January 2014 states that in the case of the closure of a rural primary school the parents of current pupils and the local district and parish councils where the school is situated **must** be consulted. The guidance also lists who should be consulted in connection with all proposed school closures. The list of interested parties was therefore compiled according to these principles comprising as wide a range of consultees as practicable to ensure that all interested parties were included and incorporated parents of current pupils and the Chief Executive of the District Council as well as individual County, District and Parish Councillors as appropriate.

Guidance requires current pupils to be consulted and all of the children on roll were given the opportunity to discuss the potential closure of their school. The children were encouraged to consider the things they love about their school, and the things they would miss if the school closed. The overall view expressed by the children was one of sadness at the thought of the closure of the school and, for the majority, what would be missed would be their friends.

A letter incorporating relevant information and reasons for the proposal was sent out to interested parties on 19 November 2014 to commence an eight week period of consultation. A public meeting was held at Great Limber Village Hall on 2 December to provide more detail about the proposal and enable parents and all interested parties to ask questions and raise concerns. Notes were taken at this meeting and are attached as Appendix H. There was the opportunity to provide a response to the consultation by letter, email or by returning the response form attached to the consultation document by 16 January 2015. Copies of the letter commencing consultation and the response form were also published on the County Council website under the webpage "Current Consultations" on [www.Lincolnshire.gov.uk/schoolorganisation](http://www.Lincolnshire.gov.uk/schoolorganisation)

All written responses received during consultation have been provided to the Executive Councillor for consideration and further details are confirmed in this report in Appendix B. To briefly summarise, however, there were 67 valid responses in total with 2 in favour, 62 against the proposal and a further 3 responses which were neither for nor against the proposal but incorporated comments for consideration. Responses were received from 12 parents of current pupils with 11 of these being against the proposal. The largest number of responses was received from local residents with 29 of these being against the proposal. Many of the responses against the proposal supported the unique small size of the school believing this benefitted the children by providing a low staff to pupil ratio, friendly atmosphere and excellent support both educationally and emotionally.

The letter giving details of the consultation process incorporated the following details of the anticipated timeline:-

<b>STAGE 1</b>	<b>STAGE 2*</b>	<b>STAGE 3*</b>	<b>STAGE 4*</b>	<b>STAGE 5*</b>
Consultation 8 Weeks	Publication of Statutory Notice	Representation Period 4 Weeks	Final LA Decision	Implementation
19 <sup>th</sup> November – 16 <sup>th</sup> January	February 2015	February – March 2015	May 2015	31 August 2015

\*These stages may only take place if a decision is taken to progress beyond the current stage. The process could be stopped at any stage. Please also note that the dates/months shown (other than for Stage 1) are for indicative purposes only and may be pushed back if required.

However, following the written responses received in the consultation period and the questions and comments raised at the public meeting the LA extended the timescales for stages 2 and 3 as above by approximately 7 weeks to allow more time for the Governing Body and the LA to ensure all alternatives to closure have been considered prior to progressing to the next stage. This extension to the process meant that the Statutory Notice (Stage 2) was published in April and the final decision (Stage 4) is likely to be taken in June 2015.

This extension of the process has enabled the following options to be explored in greater detail:-

1. LA officers have contacted all schools and academies in Lincolnshire and also a number of schools and academies that are in neighbouring authorities but within a reasonable travelling distance to consider the option of federation. Despite some early enquiries which didn't progress further there has not been any serious interest expressed in a school federating with Brocklesby Park Primary School.
2. LA officers have also contacted every Trust on the national list of DfE approved sponsors to explore the possibility of Brocklesby Park becoming an academy within a Multi-Academy or Umbrella Trust. This resulted in one Multi-Academy Trust (TMAT) expressing an interest in the school joining their Trust. Following discussions between the Trust and the Governing Body of Brocklesby Park School an application was made to the DfE which is further referred to in this report. The RSC turned down the application to convert to academy in March 2015. Since then the Trust and governors have worked on putting together a revised application that they are proposing to submit in Autumn 2015 if the school remains open. The LA has continued to support this option in parallel to the closure process.
3. Free Early Years Entitlement encourages parents to seek a provider of early education when children are 3 – 4 years old. The Governing Body believe that providing a pre-school facility for children aged 3 and 4 would increase the numbers attending the school, provide well-rounded education with good opportunities for social interaction for all pupils attending and ensure the medium and long term viability of the school. The Governing Body has researched the feasibility of offering Early Years provision at the school and has produced an initial business case (attached in Appendix I) predicated both on increased income from this provision and also a projected consequent increase in the NOR at the school. The provision of a nursery is not expected to eliminate the deficit until 2018/19 if pupil numbers were to increase as hoped. By providing a steady stream of pupils for the primary

school and making the school more attractive to parents generally the Governing Body believe that it will ensure the long term viability of the school.

However, LA and School Improvement officers have concerns over assumptions made in this business case which may be based on optimism rather than hard evidence. If the nursery facility is to be provided by a third party this would require a legal lease arrangement which would be subject to approval of the LA and would incur significant cost. As an alternative to a private provider on the school site the Governing Body has proposed the setting up and management of a Foundation Unit which would include an integrated Reception/Year 1 and preschool using existing staff. Due to the time pressure however there may be difficulties in completing the consultation process required to amend the school's age range and also obtaining planning permission for and siting the necessary mobile unit in readiness for the start of term in September 2015. In addition, this option would put additional pressure on the staff and Headteacher whilst continuing to work towards meeting Ofsted's requirements. It is also not considered best practice to combine preschool children with Reception and Year 1 into one class. Both of these considerations could have a negative impact on the quality of educational provision at the school for statutory aged pupils.

It is important to determine both the demand and viability of early year's provision on the school site before proceeding any further. From the LA's sufficiency perspective there is no need for additional early year's places in this area. Governors have undertaken a survey indicating a potential intake of 7 pre-school children for 2015/2016 if all those that expressed an interest were to take up a place. The Governing Body believes that this supports the need for a nursery but again this may be considered an over-optimistic viewpoint bearing in mind the NHS GP registration and birth data and the existing nursery provision. However, regardless of the evidence for demand, if the consultation responses and/or cash-flow fail to indicate a long-term viable plan the LA is unlikely to support either any tender activity to recruit a third party provider for a nursery on the school site or the extension of the age range at the school to include nursery provision. LA officers do not believe there is the evidence to support an early year's development on the school site and cannot provide any reassurance that this would be sustainable.

Following the completion of the consultation period and the extension to the original timescales all feedback was considered with a full report (which is referred to in the Background Papers section below and will also be re-considered along with this report) by the Executive Councillor and a decision was taken on 26 March to proceed to Statutory Notice. A statutory 4 week Representation Period was entered into on 24 April 2015 commencing with the publication of the Statutory Notice (Appendix E) in the local press, on the Lincolnshire County Council's website and at the school gates. The Complete Proposal, available in paper and electronic format (Appendix F) to which the Statutory Notice refers, was sent to interested parties as detailed in the statutory guidance and was also published on Lincolnshire County Council's website under the webpage 'Current Consultations' at [www.lincolnshire.gov.uk/schoolorganisation](http://www.lincolnshire.gov.uk/schoolorganisation).

The Representation Period provides a further opportunity for people and organisations to express their views and ensure that they are taken into account when the final decision is taken. One response was received during the Representation Period which was submitted by the Chair of Governors and Headteacher of Brocklesby Park Primary School and a copy is attached as Appendix J. This response reaffirmed the commitment of the governors to try to keep the school open and their intention to ask the HTB to reconsider their decision to reject the school's application of academisation within Tollbar Multi-Academy Trust. It is essential however that the statutory process continues in parallel with the pursuit of any alternative option. In the event that none of the options considered above result in a viable alternative to closure there should be no undue delay in the closure process in order to avoid as far as possible further negative impact on the pupils, their families, staff and the local community.

Under current legislation the LA is the decision maker for the proposal and is co-ordinating the statutory process before making a final decision in June. The LA, as decision maker, must be able to show that all relevant issues raised are taken into consideration in the decision making process. Points raised can be considered unpersuasive but must not be ignored altogether.

The last stage of the statutory process would be the implementation of the proposal with the closure of Brocklesby Park Primary School with effect from 31 August 2015.

**a) Has Local Member Been Consulted?**

Yes, the local member has been made aware of the proposal to close Brocklesby Park Primary School.

**b) Has Executive Councillor Been Consulted?**

Yes, the Executive Councillor has been involved in the discussions regarding the proposal to close Brocklesby Park Primary School.

**c) Scrutiny Comments**

The Children and Young People Scrutiny Committee will meet on 5 June 2015 to consider this report regarding the future of Brocklesby Park Primary School (final decision).

The comments of the committee to be included here when known.

**d) Policy Proofing Actions Required**

An Impact Assessment has been completed and is attached to this report as Appendix G.

## 6. Appendices

These are listed below and attached at the back of the report	
Appendix A	Governing Body letter to request consultation
Appendix B	Summary of written responses from interested parties during consultation
Appendix C	Governing Body proposal for submission to RSC
Appendix D	RSC decision on Academy application
Appendix E	Statutory Notice
Appendix F	Complete Proposal
Appendix G	Impact Assessment
Appendix H	Questions and answers at the public consultation meeting
Appendix I	Early Years Provision business case prepared by the Governing Body
Appendix J	Representation Period Response

## 7. Background Papers

Document title	Where the document can be viewed
Report on the Proposal to consider the future of Brocklesby Park Primary School (decision to go to Statutory Notice)	Lincolnshire County Council Committee Records Reference I008261 26 March 2015
The DfE guide "School Organisation Maintained Schools Guidance for proposers and decision-makers" January 2014; letter to commence the operator selection process; list of interested parties; blank response form;	All available on request from the School Organisation Planning Team, Children's Services
Individual consultation responses	Individual responses available to be viewed by the decision maker. Content of responses anonymised and summarised in Appendix B.

This report was written by John O'Connor, who can be contacted on 01522 553213 or [john.o'connor@lincolnshire.gov.uk](mailto:john.o'connor@lincolnshire.gov.uk).