## **Supporting Information and Impact Assessment**

Service / Policy:	Children's Services
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## **Section 1: Background Information**

## 1. What is the proposal / issue?

The proposal is as follows:

That the identified need for a new school in Paignton as outlined in the submitted report be noted; and that, the proposal to open a new primary school on the Torbay School Site at Torquay Road from September 2018 be approved.

#### 2. What is the current situation?

Following the Council meeting in February it has been agreed:

 that in the event that a decision is made to transfer Torbay School to the MyPlace facility, the Executive Director for Operations and Finance and the Director of Children's Services, in consultation with the Executive Lead for Children and Adults, be requested to bring forward a further report detailing the expansion of primary school places in Paignton to the Council meeting on 7 April 2016.

Following the Council meeting on 7 April 2016 it has been agreed:

 that consideration of the report be deferred to the Council meeting in July 2016.

If the decision to relocate Torbay School is taken this will leave a vacant school site in the centre of Paignton from September 2017.

Torbay Council sees this as an opportunity to open a new primary school in Paignton in September 2018.

Whilst the Council's recent programme of expansions has ensured that there is capacity to meet demand within all 3 towns, the current surplus capacity needed to meet parental preference and unpredicted demand is significantly lower than the 5-10% surplus recommended by the Audit Commission.

Following the recent application and allocation process for Reception places for September 2016, there are currently only 20 Reception places left in Torquay (2.5%) and 16 places left in Paignton (3%).

The 16 places left in Paignton are all at one school with all other schools in Paignton full for Reception 2016. This means that the Council will have to provide transport costs for any children who move in to the area and live more than 2 miles away from the school with available places. Transport costs will be approximately £67,000 per child for the term of their primary education.

The tight capacity in Paignton and Torquay does present problems for the Council when placing those children moving into the area during the school year and means that there is little capacity to meet parental preference. Last year, Torbay Council received over 1100 in year applications for places. This includes all towns and all year groups and some were for children moving from one Torbay School to another but the majority were from families moving in to the area during the academic year.

In addition there is no capacity for any unforeseen growth following completion of South Devon link road or any increases in housing targets as set by regional government.

Recent projections and the actual number of applications received this year demonstrate that the numbers previously forecast are higher than expected. For new housing, the pupil yield per household has almost doubled as a result of the type of houses that developers are now delivering quicker and in greater quantities. Developments have a higher percentage of smaller, new starter homes which result in more primary age children. This increase in pupil yield from 0.25 to almost 0.4 is a national occurrence and Officers are reviewing the current forecasting methodology to ensure that this increase is accurately reflected in future forecast data.

Officers therefore recommend that the Council takes this opportunity to open a new primary school in a location that would serve both Paignton and Torquay by 2018 as well as authorising officers to explore an additional school in the west of Paignton by September 2020. By doing so the new school has the potential to alleviate existing pressures in both areas due to high levels of demand and ensure that the Council can respond to in year migration, parental preference and any new growth from developments not already factored into the Council's projections.

If the Council does not provide these additional school places it will not be meeting its statutory duty. The Education White Paper Educational Excellence Everywhere (March 2016) states "where local authorities are failing in this duty, the government will not hesitate to intervene." Following the submission of the National Offer Day Data to the DfE in April 2016, the officers have been contacted regarding the lack of capacity within the system and the DfE are visiting in July to be assured that the plans in place are robust.

The Council also has to evolve to ensure that it is able to deliver the statutory duty in the context of a change in policy. Recent changes to the process for establishing a new school could potentially have a limiting impact on local

decision making. With all new schools being considered to be free schools/academies the decision making is undertaken by the Education Funding Agency and the Regional Schools Commissioner Office with limited opportunities for local authority approval.

Officers are aware of a number of local MATs in the process of submitting direct applications to the Education Funding Agency for a new school. By offering the site the proposal enables the Council to be in control of where the school will be, thereby ensuring the new school is in the best place and is delivered in time to ensure that the Council fulfils this statutory role.

### 3. What options have been considered?

The Council has responded to increases in the demand for primary school places by expanding schools across Torbay. Since 2012, the Council has created 854 additional places to meet this demand.

Officers have spent 18 months trying to identify a suitable site in Paignton for a new school. Other than the Torbay School site, no other site has been identified in Paignton that is big enough and offers a viable, affordable solution.

As well as a number of other sites, Officers were asked to consider whether Parkfield could be the site for the new primary school. Parkfield is not feasible as the site for the new primary school for a number of reasons. The main reason is that Council would be required to pay back the lottery grant because a new primary school would not meet the grant terms and conditions. The Torbay School relocation proposal would meet grant terms and conditions because it is for a similar age group and focus. The existing facilities at Parkfield were built with youth services in mind so are more in line with the secondary age EBD model than a primary school model. There is no playing field or Multi Use Games Area (MUGA) on the Parkfield site which is a fundamental requirement for a new primary school. A MUGA could be provided as part of the development but it would need to be smaller than recommended to avoid impinging on the other facilities already on the site. To provide a playing field or full size MUGA, the BMX track or the skate park would be lost.

Officers have also considered the option of expanding an existing school. The Council has already expanded Roselands and White Rock primary schools and further expansions are considered difficult and expensive. Many schools in Paignton occupy small, landlocked sites that will not support additional numbers. These include Curledge Street Academy and Sacred Heart. White Rock Primary and Oldway Primary are already 3 form entry primary schools which is the maximum size recommended for a primary school. Roselands and Kings Ash could be expanded further but because of their locations, additional capacity at these schools would have little impact on alleviating pressure for Torquay schools. The Council does not have the authority to instruct academies to take additional children and to have mobile classrooms on their site. In Paignton, the majority of primary schools, including Kings Ash and Roselands are academies. Mobile classrooms and bulge classes create organisational and financial difficulties for schools and represent a risk to school improvement at a time when raising standards is their focus.

Collaton St Mary Primary School has a large site and is adjacent to proposed new housing but previous and recent discussions with Planners and the Environment Agency have highlighted that the school sits directly on a flood plain. When the school was originally constructed various flood alleviation works were carried out as part of the development and these were agreed with the Environment Agency. The main provision was that the playing field was designed as a flood storage area. As a result it is unlikely that further development would be allowed on the playing fields. This means any new build would have to be as a second storey which would be costly and very disruptive to the school. The Torbay Council Service Manager for Engineering has confirmed that the proposed new housing development further up Totnes Road is located on land which has a ground level significantly higher than the flooding level identified within the primary school boundary. The drainage for this housing development is being designed as a sustainable drainage system and is being designed in order that there is no increased risk of flooding to land or properties adjacent to the development site. In addition Torbay Council are investigating a new flood alleviation scheme in this area of Collaton St Mary and any future development in the area is expected to provide a contribution towards the new flood alleviation scheme.

Collaton St Mary Primary School is in the west of Paignton so additional capacity at this school would not help alleviate the immediate pressure for Torquay schools and schools in the Preston area of Paignton. Officers are aware of the housing developments proposed for the west of Paignton and are developing proposals for either another new school in that area. The latest forecasts indicate that there is a need for a second new school or expansion in this part of Paignton in the medium to long term plan. This is in addition to the need for a new school in the Preston area of Paignton.

Preston Primary has previously been considered for expansion however there is little room for additional growth, as part of the last building project the Council built on the playground and part of the playing field. They are an academy so are unlikely to consider taking mobile classrooms or additional pupils without significant investment.

The expansion of existing schools would have to be funded by the Council through the Basic Need Grant. Torbay has recently received a £0 Basic Need allocation for 2018/19 which places significant pressure on existing projects within the Children's Services Capital Plan. There is very little capacity to provide Basic Need funding for new expansion projects within the next 4 years.

The Torbay School site was developed as a special school for children with emotional, behavioural and social difficulties with new buildings in 2003. Since then the site has been expanded to include additional external space and is being re-configured to provide a new, safer access off Brookfield Close. Following the survey of the existing site officers exert that a minimal amount of refurbishment work would be required to make it suitable as a primary school thereby offering excellent value for money. The Torbay School Site is also conveniently situated to take children from both Torquay and Paignton.

Although the overall total site area at the Torbay School site is smaller than that recommended for a 1 form of entry primary school, the actual floor area of the buildings and the majority of the classes are larger than recommended for

a primary school. The site area is also larger than the site area of the majority of other 1 form of entry primary schools across Torbay. Furthermore, the Council has received a letter of support from one of the Multi Academy Trusts that is interested in becoming the provider of the new school. The letter of support is attached as Appendix 5 and specifically states that they believe the site to be suitable for a small primary school.

# 4. How does this proposal support the ambitions, principles and delivery of the Corporate Plan 2015-19?

This proposal supports the ambition of the Corporate Plan 2015-19 for a Prosperous and Healthy Torbay.

# 5. Who will be affected by this proposal and who do you need to consult with?

Children's Services has consulted with:

- All Torbay Schools
- Local Councillors
- All Ward Partnerships
- Free School's Network
- Regional Commissioners Office
- Department of Education

# 6. How will you propose to consult?

An online consultation ran for 6 weeks from 21 April until the 2<sup>nd</sup> June 2016. The consultation papers (which consisted of a paper outlining the proposal and a response form for consultees to complete) was posted on the Council's website and hard copies made available at all Connections Offices and libraries within Torbay. Accompanying the consultation paper was a Frequently Asked Questions sheet with additional background information to the proposal. The consultation was promoted through social media and through direct emails to all Torbay schools and neighbouring local authorities advising them of the consultation.

#### **Section 2: Implications and Impact Assessment**

## 7. What are the financial and legal implications?

The Council has agreed a 4 year capital plan for school projects that is based on actual Basic Need allocations up to 2017/18 and assumes a minimum Basic Need allocation of £2m for 2018/19. However, Torbay has recently received a £0 Basic Need allocation for 2018/19 which places significant pressure on existing projects within the Children's Services Capital Plan.

In the Children's Services Capital Programme, approved by Council in September 2015, £1.5m of Basic Need funding is allocated for the provision of a new primary school in Paignton. With the latest £0 allocation for 2018/19, all Children's Services capital projects are being reviewed to try to identify savings. Officers are therefore promoting the opportunity for the new primary school to be delivered through a direct application to the Education Funding Agency (EFA). Several Multi Academy Trusts (MATs) are in the process of submitting a direct application to the EFA which, if successful, means that the new build would be funded through the EFA and not through the Council. The Council still needs to identify a suitable site as part of the process (to ensure that the school is built in time to meet the demand) but a direct application would provide the funding and free up the £1.5m committed within the Council's Capital Plan for the project. This would help overcome the shortfall in resources resulting from a £0 Basic Need allocation for 2018/19.

The Council has already spent some capital funding on developing the site through the acquisition of adjoining land at Brookfield Close and design development for a new Multi Use Games Area (MUGA), new access and entrance and site security. £750,000 was approved by Council in February 2015 for this purpose. To date, £480,000 of this budget has already been spent which includes the acquisition cost of the land.

In accordance with legislation any new school has to be opened as a free school and run by an academy trust. This means that the school site would be leased to the trust on a 125 year lease, as is the case for other academy schools. The freehold would remain with the Council.

#### 8. What are the risks?

If this proposal is not implemented then the risks are:

• Failure to meet the Council's statutory duty to ensure there are sufficient school places to meet demand

Following a higher than anticipated number of applications for primary school paces for September 2016, there is a significant risk that the Council will not have sufficient primary school places to meet demand. This is an immediate and urgent pressure. The provision of a new school would ensure that the Council has sufficient capacity to accommodate growth in the area from increases in birth rates, migration and housing. It would also give the Council sufficient surplus to accommodate in-year transfers and parental preference for the medium term until a further primary school can be built.

The loss of a viable location for a new primary school in Paignton:

As stated above other than the Torbay school site, no other site has been identified in Paignton that is big enough and offers a viable and affordable solution in the short to medium term. There are options being explored for a site for a second primary school in the west of Paignton in the medium to long term plan.

## 9. Public Services Value (Social Value) Act 2012

All services and/or works procured by Officers in the implementation of this proposal will be done in so in accordance with the Public services Value (Social Value) Act 2012.

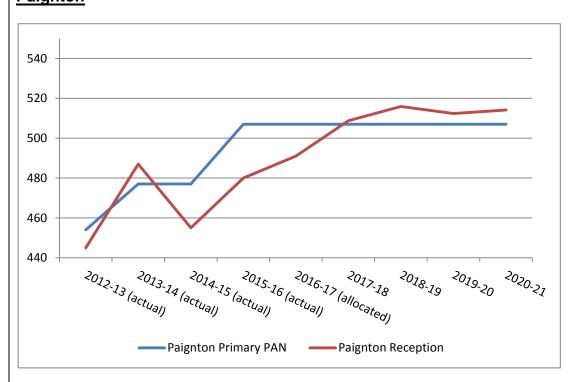
## 10 What evidence / data / research have you gathered in relation to this proposal?

The Council's primary pupil projections have been updated to reflect the actual primary school allocations for September 2016. This gives the most up to date evidence of demand. These forecasts demonstrate the need for a new primary school in the Preston area of Paignton by September 2018 as well as the need for another primary school in the west of Paignton by September 2020.

Based on the new forecasts, by 2019 the Council will have a shortfall of 10 Reception places across Paignton and Torquay with the biggest pressure in Paignton. This is before trying to build in surplus capacity of 5%-10% as recommended by the Audit Commission. To provide a 5% surplus a further 65 places are needed across the two towns. The total of the two, 75 places equates to another 2.5 forms of entry needed by 2020.

The graph below shows the difference between the places available, the actual reception numbers and the forecast numbers of children expected to apply for a place over the next 5 years in Paignton. The Planned Admission Number (PAN) for the Primary school is the total number of places available for children starting school in reception and is indicated by the blue line. The Reception forecast is the number of children expected and is indicated by the red line.

#### **Paignton**



The projections show that there will be a shortfall in places in Paignton by 2018. This is before considering the need for spare capacity to provide flexibility or meet any

unforeseen growth and recommended surplus. As the graph demonstrates actual numbers can fluctuate significantly from year to year and do not necessarily increase at a steady rate. The Council needs to be able to accommodate these peaks and troughs and the current level of capacity will not meet future demand or provide any safety net should numbers spike in the same way as they have done before.

Data from the Council's admissions team shows that there is a particularly high demand for places in the area of Paignton where we are proposing to open the new school. Table 1 below shows the number of first preferences for Paignton schools over the last 3 years and a map is attached in Appendix 2 to show their position in relation to the proposed new school:

Table 1

		1 <sup>st</sup> Preferences received					
School	Number of reception places available	2016	2015	2014	Average over last 3 years		
Collaton St Mary	30	26	35	32	31		
Curledge Street	60	46	46	40	44		
Hayes	57	37	44	45	42		
Kings Ash Academy	60	24	30	37	30		
Oldway Academy	90	128	149	99	125		
Preston Academy	45	33	34	28	32		
Roselands	45	68	41	47	52		
Sacred Heart	30	39	27	29	32		
White Rock	90*	74	55	57	62		

<sup>\*</sup>School expanded from 2015, prior to this PAN was 60

The first preference data shown above is a snapshot of the first round of applications which gives a flavour of parental preference. There is a further second and third round of allocations for late applications that will increase the number of places allocated for each school. As at June 2016, there were only 16 places available at Kings Ash Academy for September 2016. All places at all the other primary schools in Paignton have been allocated.

In 2016 the 2 closest primary schools to the proposed new school were significantly oversubscribed. Oldway Primary received 128 first preferences against an admission number of 90 and Sacred Heart received 39 first preferences against an admission number of 30. This means that a substantial number of parents from this part of Paignton are not getting a place at their preferred local school. In 2015 a total of 78 pupils were on the waiting list for a place at these schools.

From the schools that were full in 2014 and 2015 the Council can confirm that six of them (Curledge Street, Kings Ash, Oldway, Preston, Roselands & White Rock) filled from their catchment area; the data on the remaining schools is not available. Thirty four children from the catchment area of Oldway did not succeed in getting a place at the school.

These schools are oversubscribed for a number of reasons. Oldway in particular is

very popular with parents and first preferences nearly always exceed the number of places available. The number of first preferences for these schools reflects parental choice but preferences are also rising because of demographic growth and demand in this part of Paignton is forecast to continue to rise for the foreseeable future.

Table 2 below shows how the birth rate is expected to continue to rise.

Table 2

Year	Live Births	Year of entry into Primary School	Live births in the Preston Ward
2011/12 (actual)	464	2016/17	135
2012/13 (actual)	491	2017/18	136
2013/14 (actual)	498	2018/19	139
2014/15 (forecast)	515	2019/20	145
2015/16 (forecast)	532	2020/21	150
2016/17 (forecast)	549	2021/22	155

In addition to the the forecast pressure for future Reception places, there are also very few places across current primary year group cohorts. Council Officers dealing with in-year admissions have to work with a very small amount of capacity in existing year groups when placing new children moving in to the area. The majority of Paignton primary schools are full in some year groups or full throughout with a waiting list for places. The current capacity available for year groups already placed in schools and the issues facing the admissions team placing pupils is illustrated by Table 3:

Table 3

School	R	eceptic avai	Pupils on waiting list			
3011001	April 2015	July 2015	April 2014	July 2014	July 2015	July 2014
Collaton St Mary	Full	Full	Full	Full	11	4
Curledge Street	4	Full	18	2	0	0
Hayes	3	Full	8	4	0	0
Kings Ash Academy	6	9	21	8	0	0
Oldway Academy	Full	Full	Full	Full	65	12
Preston Academy	Full	Full	8	3	13	0
Roselands	Full	Full	Full	Full	8	8
Sacred Heart	Full	Full	Full	Full	12	6
White Rock	30	16	Full	Full	0	4

Torquay faces similar pressures and another reason for choosing the Torbay School site for the new school is the expectation it will admit pupils from both towns. Although a catchment area for the new school has not been defined and would be determined by the trust managing the new school, Officers expect a new school in this location to provide places for children coming from the outskirts of Torquay as well as providing places for those pupils from Paignton that are currently going to schools in Torquay. It is expected that the knock on effect of this would be that more capacity would become available in other Torquay primary schools, reducing pressure across the town. The data in Table 4 shows the amount of movement

between the two towns and the high number of Paignton pupils currently attending Torquay primary schools:

# Table 4

			HOME LO	CATION	
	2015	PAIGNTON	TORQUA Y	BRIXHA M	OUT OF AREA
	PAIGNTON	4273	173	62	93
N O	Primary	3073	58	38	33
SCHOOL LOCATION	Secondary	1167	67	19	52
CA	Special	33	48	5	8
9	TORQUAY	941	8940	57	1350
OL	Primary	126	5257	5	109
유	Secondary	444	3499	23	1199
၁ಽ	Special	143	184	29	42
	BRIXHAM	914	134	2041	263
	Primary	124	11	1160	40
	Secondary	790	123	881	223

The following is a breakdown of which schools in Torquay those 126 pupils from Paignton currently attend:

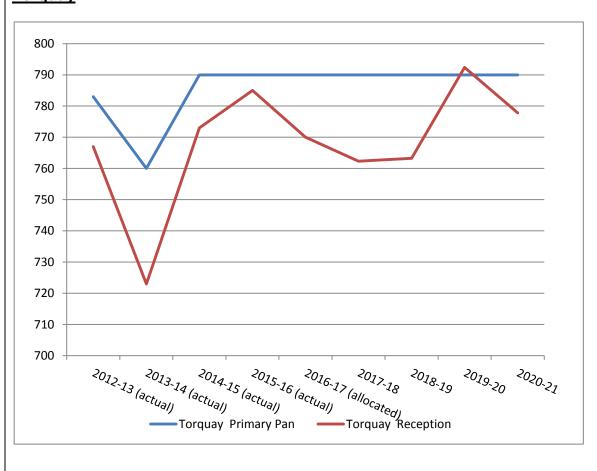
Table 5

School	Number of pupils from Paignton
All Saints Babbacombe	1
Barton	13
Cockington	15
Ellacombe	6
Homelands	10
llsham	4
Priory	6
Queensway	7
Sherwell Valley	20
Shiphay	12
St Margarets	5
St Marychurch	5
Torre	8
Upton	6
Warberry	5
Watcombe	3
Total	126

Whilst there is capacity in Torquay to meet the forecast demand – there are only 20 places currently available in Reception for September 2016 which is only 2.5% surplus capacity. This places significant pressures on the Council when trying to meet parental preference or when placing children that move into area mid-year.

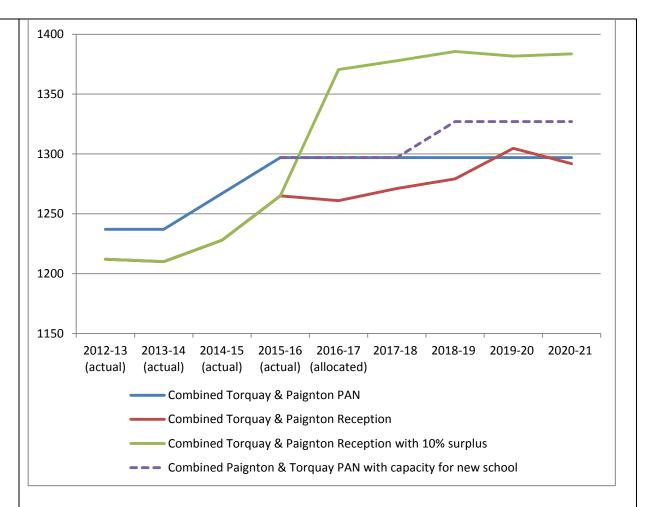
The following graph shows the current PAN in Torquay Primary schools alongside the actual reception intake and the number expected to apply for a reception place over the next 5 years in Torquay.

#### **Torquay**



The Audit Commission recommends a surplus of between 5% and 10% of places to allow for parental preference and choice. The graph shows that by 2019, there will be no surplus capacity to allow for parental choice or to meet demand from children moving in to the area in-year.

The graph below shows the combined PAN for Torquay and Paignton alongside the combined projections for the areas with and without the 10% surplus capacity and the additional capacity from the new primary school.



The proposal to build the new primary school on the Torbay Road site will help to address the shortfall in both towns raising the combined PAN capacity for Paignton and Torquay from 1297 to 1327; this would result in a projected surplus of 2% across the 2 towns for September 2019. With a second primary school proposed for the west of Paignton for September 2020, the Council is aiming towards increasing that surplus to the recommended 5% minimum.

As well as considering the need and impact of the tight capacity in the admitting year group i.e. the reception intake; Officers also need to consider the impact of such tight capacity across all year groups.

Historical data in Table 6 shows how Key Stage 2 classes have grown over the last 3 years placing pressures on schools as they admit pupils above their PAN once they are outside of the Key Stage 1 legislation. This is often through necessity because of an appeal or to avoid splitting siblings – although this cannot always be avoided.

#### Table 6

	TOTAL KEY STAGE 2							
	2015 2014 2013 Increase 2013-2015							
Paignton	1700 1695 1642 58							
Torquay	2915 2809 2743 172							

The proposal for the new school provides some flexibility to the Council to better manage in year admissions. This is a significant factor when considering place planning as for 2017-18 the Local Authority has removed the designated areas for community and voluntary controlled schools and the majority of non-faith academies have removed their designated areas too. As before all schools will have to admit pupils with a Statement of Special Educational Needs or an Education, Health and Care Plan that names the school and they will also have to prioritise children in care and children adopted from care or subject to a child arrangements or special guardianship order. Most importantly, this change means that non-faith schools will be prioritising all siblings next, followed by other children prioritised according to distance from the school. So there will be an even greater need for more surplus capacity to ensure the Council can place siblings together.

Appendix 3 demonstrates the lack of capacity throughout all year groups across both Torquay and Paignton schools. In September 2015 there were only 177 surplus placements for all year groups against a total planned number of 9353. This also includes some schools going over the planned admission number to accommodate in year admissions.

Where there are very few places available in schools in an area, the impact is as significant:

### Impact on pupils, families and schools:

- Where families have more than one child, they are often unable to get both children into the same school. The consequence of this is that one or more children arrive late to school regularly or are collected late, this impacts on pupil attendance.
- Where there is an older sibling already in a school and a younger one cannot get a place in the same school in Reception, the family will often remove the older child. This is disruptive for both the child and the school.
- Where a pupil is placed in a school a long way from their home address they
  very often stay on the waiting list for a place at a closer school. If/when a
  vacancy arises, they move from the distant school to the closer one and this is
  disruptive both for the pupil and for the school.
- Pupils moving into a school during the year take time to catch up; if they move more than once due to initially being placed in a distant school, there is a double impact on their learning due to two transitions
- Parents are unable to make arrangements with local family and friends to help with journeys to and from school which can impact on pupil attendance.
- Families moving into the area and having to send their child(ren) to a school a long way from home find it harder to integrate into their local community.
- Where children have to travel to school by taxi, parents are often extremely unhappy for them to travel by themselves with an escort at the age of 4 or 5 years.
- An increasing number of parents are choosing to home educate their children because there is no local school place. Where parents are not properly equipped to do this, there is a negative impact on learning for these children and a potential safeguarding risk. Sometimes the parent then realises the child needs to be in school and their learning is behind that of other pupils in the class.

### Impact on council budget:

If the pupil is in KS1 and there is no school place available within 2 miles, the
council has to fund taxi transport plus an escort. This usually costs several
thousand pounds per year. Once a child has started at a distant school
because there is no closer place available, the council cannot force them to
move to a closer school so the transport costs could continue for up to 7 years
(approx £67K commitment per child).

#### Impact on council staff:

- There is a significant increase in the time taken to process admission applications where there are insufficient local places and many more interactions with schools and parents before a place can be allocated than where there is a local place available. Time also has to be spent arranging taxi transport including a procurement process and a recruitment process for an additional home to school escort.
- Parents become angry and frustrated and direct their anger towards staff, making their work stressful.

## 11 What are key findings from the consultation you have carried out?

A consultation on this proposal was carried out by the Council from 21 April until 2 June 2016. An on-line survey was published on the Torbay Council website and repeatedly promoted in the local media, as well as on social media including Twitter and Facebook. Hard copies of the consultation were made available to the parents/carers of pupils attending the school and were made available at all the Connections offices and libraries within Torbay.

At the close of the consultation 63 responses had been received. A full report on the consultation is attached as Appendix 4.

# 12 Amendments to Proposal / Mitigating Actions

There are no amendments to the proposal or mitigating actions.

# **Equality Impacts**

Identify the potential positive and negative impacts on specific groups							
	Positive Impact	Negative Actions	Impact	&	Mitigating	Neutral Impact	
Older or younger people	More capacity in the centre of Paignton; providing more opportunity for children to access a place at their local school; more opportunity to meet parental preference;						
People with caring Responsibilities	More capacity in the centre of Paignton; providing more opportunity for children to access a place at their local school; more opportunity to meet parental preference;						
People with a disability	Any new school would be made DDA compliant						
Women or men						Neutral Impact	
People who are black or from a minority ethnic background (BME) (Please note Gypsies / Roma are within this community)						Neutral Impact	
Religion or belief (including lack of belief)						Neutral Impact	
People who are lesbian, gay or bisexual						Neutral Impact	
People who are transgendered						Neutral Impact	
People who are in a marriage or civil partnership						Neutral Impact	

	Women who are pregnant / on maternity leave		Neutral Impact
	Socio-economic impacts (Including impact on child poverty issues and deprivation)		Neutral Impact
	Public Health impacts (How will your proposal impact on the general health of the population of Torbay)		Neutral Impact
14	Cumulative Impacts – Council wide (proposed changes elsewhere which might worsen the impacts identified above)		
15	Cumulative Impacts – Other public services (proposed changes elsewhere which might worsen the impacts identified above)		