

## Report to Housing Scrutiny Panel

Date of meeting: 31<sup>st</sup> January 2012

Portfolio: Housing – Cllr M. McEwen

Subject: Subject: New Site Licence Conditions for Park Home Sites

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Committee Secretary: Mark Jenkins (01992 56 4607)



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### Recommendations/Decisions Required:

1. That the Housing Scrutiny Panel considers the following interpretations with regard to the Standard Licence Conditions for Permanent Residential Park Home Sites in Epping Forest District Council and recommends them to Cabinet accordingly:

- a) **Smoke Detection.** Officers should recommend to residents that mains-linked smoke detection should be installed in their homes and offer funding, whilst available, to provide this where the home owner is eligible. However, where owners do not install mains-linked systems, they be allowed to install one battery operate alarm in the porch and one in the home;
- b) **Fences.** That the same guidelines that are applied under Planning legislation, in terms of adornments and calculation methodology, be used to assess whether the height of fences meet the requirements of the Site Licence Conditions; and,
- c) **Hedges.** That the following definition, that a hedge is '*a number of woody plants, whether capable of growing into trees or not, which are so planted as to be intended to be in line and which, when mature, to be so integrated together as to form a screen or a barrier*' is adopted for the purposes of the Site Licence Conditions.

2. That, with regard to timber decking, the Panel considers the following options for interpretation and recommends one of them to the Cabinet accordingly:

- a) That decking is a structure within the terms of Condition 2(iv)(c) and, therefore, require that any combustible decking that extends more than 1 metre into the separation distance or reduces the space between homes to less than 4.5 metres is removed;
- b) To interpret 'decking' as a structure within the terms of Condition 2(iv)(c) but to allow any decking that is in place on the date the licence is issued to remain; or
- c) To interpret decking as being part of the property and as such allow existing decking to remain by virtue of Condition 2(i).

**3. That, with regard to porches, the Panel considers the following options for interpretation and recommends one to the Cabinet accordingly:**

- a) That porches are ‘structures’ for the purposes of Condition 2(iv)(c) and are required to be removed if they are closer than a 4.5m clear distance from any adjacent park home;**
- b) That porches are ‘structures’ for the purposes of Condition 2(iv)(c) and should not be positioned closer than a 4.5m clear distance from any adjacent park home, but that any that are so positioned at the time the site licence is issued shall be allowed to remain; or,**
- c) That porches are not ‘structures’ for the purposes of Condition 2(iv)(c) and are, therefore, allowed to be positioned closer than 4.5m from any adjacent park home.**

**4. That, as a result of the Scrutiny Panel’s views and the decisions of the Cabinet, any required amendments to the Council’s previously-agreed Licence Conditions be made by officers, in order to incorporate and/or clarify the Cabinet’s decisions.**

**Report:**

1. On 18 April 2011, the Cabinet agreed to the adoption of the ‘Standard Park Home Licence Conditions for Permanent Residential Sites in Epping Forest District Council’ (ref: C-069-2010/11). The agreed Conditions include some variations to the Model Standards 2008 and also allow for certain contraventions to remain provided they are in existence on the date the new site licence is issued.

2. Following the Cabinet decision, good progress has been made and Officers have completed inspections on all of the sites, measuring and recording existing arrangements with respect to the positioning of homes and identifying any contraventions to the new Site Licence Conditions. It is important to identify the contraventions that the Cabinet has agreed may continue because if they are not such agreed exceptions to the Conditions, homeowners will have to remove them. The Officers’ inspection reports will be presented to the respective site owners to explain both the contraventions that need to be remedied and the contraventions that exist but are allowed to remain by virtue of the Cabinet’s decision.

3. At its meeting on 19 July 2011, the Housing Scrutiny Panel agreed to add an additional item to its Work Programme to receive a progress report on the implementation of the new licence conditions for park homes. It was noted that it was likely that this would be submitted to the Panel around January 2012.

4. During the course of Officers’ inspections, however, certain anomalies have come to light since the time of the Cabinet meeting in April 2011, which are not specifically covered in the Conditions. Officers therefore now need determination from members on the interpretation to be adopted for these matters, which are explained below, so that they can interpret the decisions of the Cabinet correctly and in accordance with the spirit of the Members’ decisions, particularly bearing in mind the strength of feeling of the residents and site owners. The particular anomalies, and the number of recorded occurrences on each of the sites, are shown in the table at Appendix 1.

5. Officers held a meeting with Park Home Site Owners and representatives of each of the site residents associations to gauge their views on the matters below. Apart from the

owner of Woodbine Close and Breach Barns in Waltham Abbey and any representative of the residents on the Woodbine Close site, all the sites were represented. At the meeting representatives were informed that their comments would be included in this Report of which they have received a copy. The comments received are attached in Appendix 2.

6. A meeting is also scheduled to take place between the Leader, the Housing Portfolio Holder, Officers and the Senior Divisional Officer for Essex Fire and Rescue Services on 24 January 2012; the outcome of which will be reported at the Housing Scrutiny Panel meeting

### **Porches and Smoke Detectors**

7. This issue relates to park homes with a porch attached. The 2008 Model Standards 2008 allows only one door to either the porch or the home, however, many existing park homes have two doors; one between the home and the porch and another between the porch and the outside. Many residents prefer two doors as it improves thermal efficiency as well as providing extra storage.

8. Following the recommendations of the Housing Scrutiny Panel and consultation with residents, the Cabinet agreed that two doors could be allowed, provided mains-linked smoke detectors are installed both in the porch and the living space of the home, for fire safety. During inspections, however, many homes were found to have two doors but only had battery operated or hard-wired interlinked smoke detectors that do not meet the specification agreed by Members.

9. There is considerable resistance from residents against complying with the requirements as they stand. Residents appear prepared to put in smoke detectors but consider that battery operated ones are adequate on the basis that:

- When Essex Fire and Rescue Service has installed smoke alarms at home-owners' request (as part of the Home Fire Safety Scheme), the Fire Service has considered it sufficient to install one battery operated alarm even where porches with two doors were present;
- There is no requirement in the Conditions to test that the wired system is properly maintained, therefore there is no advantage to require mains-wired rather than battery operated detectors (although it should be noted that, by definition, batteries discharge and make the detector inoperable unless the battery is changed);
- At an estimated cost of £300, the work to install detectors that meet the specification would be costly; and
- The installation of new detectors will be disruptive to occupiers and destructive to property, requiring either chasing-in and redecoration, or surface mounting which will be unsightly.

10. Officers have sought the opinion of Essex Fire and Rescue Service who, although initially reiterated their position that there should be no detraction from the Model Standards which stipulate that closed porches should not be tolerated on park home sites at all, have now agreed that battery operated smoke detection is acceptable.

11. The Council's Home Improvement Agency, C.A.R.E., has been provided with £20,000 of funding by Supporting People to provide help to older and/or otherwise vulnerable people on Park Home Sites to meet certain site licence requirements, such as the removal of sheds and hedges. Some of this funding could be used to provide smoke detection systems that meet the terms of the Conditions, however, not all residents would qualify for this financial support. It is understood, however, that the Fire Service will install battery operated smoke detectors free of charge for the time being, although this situation may change in future

months following a recent review of the service.

12. The purpose of smoke detectors is to provide early warning to residents to leave their home rather than to prevent fires or stop them spreading from home to home, which many of the Licence Conditions relate to. There is no licence requirement to provide smoke detection in park homes generally, it could therefore be argued that the provision and maintenance of smoke detectors in the home is a personal responsibility and choice, the implications of which affect a single household, rather than general fire safety affecting the wider park home community.

13. At the meeting on 17 November 2011, the Site Owners and representatives of park home residents were in agreement with the proposal to accept battery operated smoke detectors and it is recommended, therefore, that Officers should recommend mains-linked smoke detection to park owners and offer funding to provide this where the home owner is eligible. However, where owners do not install mains-linked systems, they be allowed to install battery operated systems with one alarm being placed in the porch and one in the home.

### **Timber Decking**

14. The issue under consideration is whether timber decking constitutes a 'structure' under the terms of the Site Licence Conditions. Condition 2(iv)(c) states that, 'Any structure including steps, ramps etc. (except a shed, garage or car port), which extends more than 1 metre into the separation distance shall be of non-combustible construction. There should be 4.5 metres clear distance between any such structure and any adjacent park home.' The reference to sheds within the Condition is not within the Government's Model Standards, but was added by the Cabinet within the Council's own Condition.

15. It has now been established that there are many cases on the sites of timber decking extending more than 1 metre into the separation distance and in some cases decking surrounds the home on 3 sides. While timber decking is not specifically mentioned as a 'structure' in Condition 2(iv)(c), neither is it listed as an exception. In some cases, the installation of timber decking has resulted in the 4.5 metre separation space between structures being compromised, particularly if the distance between the 2 mobile homes is less than the required 6 metres (but is being tolerated by virtue of being in place before the new site licences are issued).

16. At the consultation meeting, home-owners were strongly of the view that decking should not be considered to be a structure and, therefore, not be restricted in terms of size or construction. Decking is expensive to provide and lay; some decking is very elaborate and forms an attractive surround to the home. In addition, on some of the sites, the value of park homes is enhanced by their view over the surrounding countryside. Residents argue that removing it will devalue their property. In a number of cases, the decking is integral to the home as it provides a useful platform between the home and garden that are on different levels. In addition, if the condition with regard to a separation distance of 4.5m was imposed, situations may occur where, regardless of decking construction, the width of the decking allowed may compromise the optimal width needed for wheelchair access.

17. At the meeting on 17 November, one site owner reported that she had commissioned fire risk assessments on her sites and had been informed that extremely high temperatures must be reached before decking would burn. Another site owner suggested that treating the timber with a fire retardant might offer an increased level of safety and the consensus view was that in future decking should only be allowed if it is suitably fire treated or non-combustible.

18. To summarise, the owners of mobile homes that have decking vehemently oppose removing or modifying it. They consider that decking is part of the main home and, as such,

should be allowed to remain by virtue of Condition 2(i) of the Standard Licence Conditions, which states:

*'Every park home must where practicable be spaced at a distance of not less than 6 metres (the separation distance) from any other park home which is occupied as a separate residence. However, any park home that contravenes this condition at the date on this licence will be allowed.'*

19. However, officers are of the view that timber decking is a structure (similar to steps and ramps), is of a combustible material, is therefore covered by Condition 2(iv)(c) and requires a 4.5 metre separation distance. Officers are also concerned about the increased risk of fire spreading between park homes if the provision of decking does not provide a 4.5 metre separation distance.

20. Notwithstanding this concern, Members are reminded that the Model Standards on which the proposed site licences are based do allow the Council to depart from the Model Standards, to exclude or change one or more of the conditions about which residents have concerns if, having regard to the Model Standards and the views of the Fire Authority, it considers that:

(i) the current licence conditions are adequate in serving their purpose in respect of these issues, and the new standards/conditions should not therefore, be applied;

(ii) having regard to all the relevant circumstances of the sites, the Council is satisfied that it has justifiable reasons for allowing these contraventions that take place on the date of the new licence, after taking account of the representations made by existing park home owners and site owners; and

(iii) the benefits that the new licence conditions will achieve (by complying with the Model Standards) are outweighed by the interests of existing residents and site owners in respect of these issues, having regard to the substantial representations made.

21. The views of the Essex Fire and Rescue Service on all the issues referred to in this report are provided under the "Conclusion" section.

#### Options:

22. The following appear to be the main options of interpretation for consideration by the Scrutiny Panel and Cabinet:

- a) To interpret 'decking' as a structure within the terms of Condition 2(iv)(c) and, therefore, require that any combustible decking that extends more than 1 metre into the separation distance, or any decking that reduces the space between homes to less than 4.5m to be removed, within a prescribed period (to be determined);
- b) To interpret 'decking' as a structure within the terms of Condition 2(iv)(c) but to allow any decking that contravenes the Condition, but is in place on the date the licence is issued to remain; or
- c) To interpret decking as being part of the property and as such allow existing decking to remain by virtue of Condition 2(i).

23. If Members are minded to allow all, or some, decking to remain (Options b) and c)) they may wish to take into account the possibility of it being treated with a fire retardant preparation, either by pressure treatment or brush application. However, in their consideration of this, Members should also take into account the fact that Officers will need to

make sure that the Conditions are being adhered to and it may prove difficult to ensure that any fire retardant treatments have been applied in accordance with manufacturer's instructions and as frequently as required. The effectiveness of any brush application is likely to be compromised with time by pedestrian traffic and inclement weather; and pressure treatment of structures already in situ is likely to be cost prohibitive

24. In addition, if Members agree that decking may not remain, either by virtue of Option a) or Option b), all parties need to be aware that Officers will ensure that this condition is enforced and that park home owners will be made to remove any decking not meeting the requirements.

## **Fences**

25. The issue under consideration concerns the definition of the term 'fences'. Condition 2(iv)(f) of the Council's Standard Licence Conditions states that, 'fences and hedges, where allowed and forming the boundary between adjacent homes should be a maximum of 2 metres high'. It should be noted that the Government's Model Conditions state that the height should be 1 metre, but this was varied by the Cabinet for the Council's own Conditions.

26. Over the years many residents have erected decorative and sometimes elaborate constructions to separate themselves from their neighbours. These may be incorporated in the fencing (e.g. trellis on top of fencing) or an extension of it (e.g. archways and pergolas) and, as a result, it is subject to interpretation where the fencing starts and finishes as it appears to continue around the whole perimeter of the home.

27. Site residents have argued that the Condition relates to 'fencing' only and, therefore, any other timber constructions attached to the fencing should be allowed to remain and at any height. Many are very reluctant to remove some of these decorative arrangements as they add character and individuality to their homes and in many cases have been costly to provide.

28. At the meeting on 17 November, the Site Owners and representatives of the residents also put forward the view that on a sloping site, a 2m high fence is not sufficient to provide privacy. Officers informed them, however, that Planning legislation includes a requirement that fences over 2m in height require Planning Permission and it is considered that it would be sensible to apply the same criteria and to measure the height of fences in the same way. When applying this legislation, Planning Officers measure the height of fences from ground level to the top including any gravel board and/or trellising.

29. It is recommended, therefore that the same guidelines that are applied by Planning Officers are used to assess whether the height of fences meet the requirements of the Site Licence Conditions, namely that any construction made of combustible material and attached to a fence or forming a barrier between two homes within the separation distance is considered to be 'a fence'. The '2m rule' applies to it all, thereby requiring any structures that do not comply to be removed.

## **Hedges**

30. This issue relates to the definition of trees and hedges. As mentioned above, Condition 2(iv)(f) refers to the height of fences and hedges. However, the Council's own Conditions depart from the Model Conditions and state that, 'trees are not considered to be hedges and therefore not being subject to any height restriction, provided they do not present any nuisance or health and safety risk'. Therefore, distinguishing between a tree and a hedge has implications in determining whether there is a height limit or not and it is not always a straightforward decision particularly where a row of trees stand close together to form something looking like a hedge.

31. It is recommended, therefore, that the following definition, which exists in common law, is used as a guide. A 'hedge' is, *'a number of woody plants, whether capable of growing into trees or not, which are so planted as to be intended to be in line and which, when mature, to be so integrated together as to form a screen or a barrier'*. Site Owners and representatives of the residents at the meeting on 17 November expressed agreement with this approach.

## **Porches**

32. Condition 2(iv)(a) states that, although porches may protrude 1 metre into the separation distance, they but must be no more than 2 metres in length and 1 metre in depth. Members have already agreed that porches that do not comply with these dimensions at the date of the site licence will be allowed to remain until the home is replaced. In addition to this, however, Officers have always considered that porches are 'structures' for the purpose of Condition 2(iv)(c) and, therefore, there should be a clear 4.5m clear distance between any such structure and any adjacent park home. This is for fire safety, by reducing the risk of fire spread between park homes. Under Condition 2(iv)(c) this requirement must be met regardless of whether the porch is in place on the date the licence is issued.

33. Site Owners and the representatives of residents at the meeting on 17 November were aggrieved at this as they had understood that it had been agreed that **all** contraventions, not only those that had been specifically identified as exceptions, could stay forever if they were in place at the date of the new site licence. Officers clarified that this was certainly not the approach agreed by members and that only specific contraventions would be allowed to remain. However, representatives expressed a considerable strength of feeling on the issue of porches and asked Officers to relay this to Members.

34. As with timber decking, Officers are of the opinion that porches are structures and are therefore covered by Condition 2(iv)(c) and require a 4.5 metre separation distance. However, Members are reminded that the Model Standards do allow the Council to depart from its provisions, to exclude or change one or more of the conditions about which residents have concerns, provided it has regard to the Model Standards and the views of the Fire Authority. The Fire Authority's views are set out in the Conclusion section of this report.

## Options:

35. The following appear to be the main options of interpretation for consideration by the Scrutiny Panel and Cabinet:

- a) To not consider porches to be 'structures' for the purposes of 2(iv)(c) and therefore allow them to be positioned closer than 4.5m from any adjacent park home.
- b) To consider porches to be 'structures' and not to allow any new porches to be positioned closer than a 4.5m clear distance from any adjacent park home but to allow any that are so positioned at the time the site licence is issued to remain.
- c) To consider porches to be 'structures' and not to allow any new porches to be positioned closer than a 4.5m clear distance from any adjacent park home and to require any porches that are already closer than this to be removed, within a prescribed period (to be determined)..

36. As with decking, Members may wish to consider the option of improving the fire retardant properties of porches that are allowed to remain (Options a) and b)). However, in their consideration of this, Members are reminded again that Officers will need to make sure that the Conditions are being adhered to and it may prove difficult to ensure that any treatments have been applied in accordance with manufacturer's instructions and as frequently as required.

37. In addition, if Members agree that porches do not meet the requirements of the Conditions, either by virtue of being considered a 'structure' (Option c)) or by virtue of it being a structure that was installed after the date of the new Site Licence (Option b)), Officers will ensure that this condition is enforced and porches not meeting the requirements will have to be removed.

## **Conclusion**

38. Officers have consulted with Essex Fire and Rescue Service during the process of agreeing the Conditions to attach to site licences and have also sought their views on the matters outlined above. The Fire Officer's view has always been that there should be no detracting from the Model Standards. However, given that the Conditions already vary from the Model Standards, Members may consider it acceptable to make a decision on some, or all, of the issues outlined above which is at variance with the Fire Officer's recommendations, particularly given the extent of public and Member interest in this matter. As explained earlier, this is permissible, provided Members have regard to the Model Standards and the views of the Fire Authority. Feedback from the meeting on the 24 January 2012 between the Leader, the Housing Portfolio Holder, Officers and the Senior Divisional Officer for Essex Fire and Rescue Services, which will be reported at the Housing Scrutiny Panel meeting, may also assist Members in making their decision.

39. The Scrutiny Panel is asked to consider the issues above and set out in the Recommendation on Officers' interpretations of some of the Conditions, and the options available for others, and to make recommendations accordingly to the Cabinet as, unless these matters are clarified, the process of issuing the new licences will be delayed. Once these matters have been clarified, Officers will proceed to issue the new site licences and a further progress report will be made to the Housing Scrutiny Panel in July 2012.

40. Subject to the views of the Scrutiny Panel and the decisions of the Cabinet, it may be necessary to amend some of the Council's previously-agreed Licence Conditions to incorporate and/or clarify the Cabinet's decision.

## **Reason for decision:**

Officers have completed the inspection of all of the park home sites in the District but are not able to issue the site licences because the Conditions are unclear on the points outlined in the Report. Given the strength of feeling of residents and Site Owners, Officers feel that the Scrutiny Panel should give consideration to these issues and make a recommendation to the Cabinet accordingly.

## **Options considered and rejected:**

Particularly because of the high profile that this issue has among Members, Site Owners and park home residents, Officers feel that it would be inappropriate to make a decision on them without them first being considered by the Scrutiny Panel. Therefore no alternative options have been considered.

## **Consultation undertaken:**

Site Owners and representatives of park home residents were consulted at a meeting with Officers on 17 November 2011. Apart from the owner of Woodbine Close and Breach Barns in Waltham Abbey and any representative of the residents on the Woodbine Close site, all the sites were represented. All Site Owners and residents' representatives received a draft copy of this Report and their comments are attached as an Appendix.



**Resource implications:**

Budget provision: Within existing resources, unless legal action has to be taken against a large number of site owners, which could be costly and unable to estimate at present.

Personnel: Nil

Land: Nil

Relevant statutory powers: Caravan Sites and Control of Development Act 1960

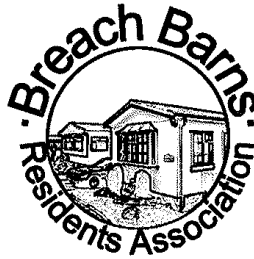
Background papers: Standard Licence Conditions for Permanent Residential Park Home Site Owners in Epping Forest District Council.

Environmental/Human Rights Act/Crime and Disorder Act Implications: The purpose of the Model Standards are to ensure a safe environment for residents. As explained in the report, there are no contraventions of the Human Rights Act

## Appendix 1

**Table Showing Contraventions for Each Site**

Contraventions	Breach Barns	Woodbine Close	Abridge	The Elms	Ludgate	The Owl	Roydon Mill	Total
Less than 6m from neighbouring home	123	88	44	21	18	12	9	315
Number homes less than 3m from boundary	7	4	7	3	15	4	3	43
Less than 2m from a road	22	13	1	13	0	0	0	49
Porches above 2m x 1m	26	39	20	20	10	6	10	131
Closed porches	21	31	23	18	12	3	8	116
Hedges above 2m	41	35	6	4	2	4	11	103
Fences above 2m	0	5	2	4	1	0	2	14
Decking more than 1m into separation and combustible	20	7	2	6	7	6	1	49
less than 4.5m between decking and neighbouring park home	12	2	0	4	5	4	1	28
Less than 4.5m between porch and park home	0	0	7	5	10	0	0	22



**Comments on (DRAFT) Report to Housing Scrutiny Panel 31 January 2012**

**Recommendations/Decisions Required**

P.3 1 a) Smoke Detection

We agree that residents be allowed to install one battery operated alarm in the porch and one in the home.

On P.5 (8)(c) Essex Fire Service have been satisfied in the past with installing one battery operated alarm in the home regardless of the porch.

Batteries discharge and become inoperable; however we have had long power cuts into and sometimes throughout the night in recent years which would make mains operated alarms useless.

On P.5 (12) as pointed out this is not a measure to prevent spread of fire, just a warning to individuals. There is no condition in our Home Insurance policies that stipulates we have to install an alarm.

1 b) Fences

We agree

1 c) Hedges

We agree

2 We support option b)

Ref. P.6 (17) Comments made by a site owner regarding the likelihood that decking will take a long time to ignite and on P. 7 (23) the impracticality of application of fire retardant products to decking in any enforceable manner.

We support the comments made on P.7 (19) (i) (ii) and (iii) as a sensible way forward.

P.4 3. We support option b)

We would like to emphasise again the outstanding record of safety on Breach Barns Park since its inception in the 1960's and the low number of fires resulting in destruction of a home and no injuries.

Most of the porches, fences, hedges and decking have been in existence for many years and residents are well aware of measures that need to be taken to keep their homes safe.

We would like the site licence conditions to be based on common sense decisions regarding risk.

NB. para nos. amended by hand by virtue of new paragraph 6. being inserted into draft report after its circulation to residents associations and site owners

11 January 2012

**My name is Estelle Martin and I speak on behalf of the residents at Ludgate House.**

**To say that our residents are upset with the latest developments is an understatement. Shocked, angry and distressed would be a better description. Like everybody else, they were under the impression that matters had been resolved and were looking forward to living a stress-free existence in a peaceful environment. However, it now appears that this is not going to be the case yet again. Their premises have been lovingly decorated and improved over the years and to find that this is now under threat is causing a great deal of anxiety and stress. They only ask to be left in peace to enjoy their properties and surroundings.**

**I cannot see how our premises differ from a bricks and mortar property where decking and porches are concerned. Most of these properties now have decking in their gardens but would the Council take such a stance in those circumstances.? I think not. We take pride and care in our properties and would not put ourselves or any other resident at risk. I would say that we are most vigilant where this is concerned.**

**If such structures had to be removed, this would put residents to a great deal of expense, most of whom could not afford to replace them or make alterations, and this would seriously devalue the premises if they had to be sold in the future. Indeed, such structures have been in place for many years and a lot of these were installed by previous residents. In most cases, the decking has been installed to level off the gardens as a lot of these are built on an incline, and they also provide a safe and easy access to the gardens.**

**I would therefore ask that the Council not require residents to remove these structures but only to apply the rule to new premises which are erected.**

E- mail response from the Site Owner of The Owls, The Elms and Ludgate Park Home Site

16 January 2012

Dear Sally

I have spoken to the Residents Associations on the Elms, Owl and Ludgate Parks.

We feel the best options would be:

C for porches

B for decking

With regard to decking this would mean that no one in the future could have decking that was more than one metre wide. As discussed at the meeting on 17 November that is not big enough for a wheelchair. This also disadvantages residents who live on a slope, who require some sort of platform so there is not a large drop from their door to the ground, or level ground on which to place tables, chairs etc. From what I understand from the independent advisors that I hired to do risk assessments decking only burns at extreme temperatures. Surely pressure treated, fire retardant decking would be acceptable in the future?

As you are aware there is considerable anger and distress amongst the residents who feel victimised and deeply resentful of these restrictions. I will be meeting with representatives from the Elms, Owl and Ludgate Parks on Wednesday. We were unable to meet prior to today's deadline so will email / write to the Councillors directly.

I would like to thank you for your help in this difficult situation. Your time and effort has been much appreciated.

Peter McMillan from the Owl Park will be speaking on 31 January.

Kind Regards

Dr Claire Zabell