

Further thoughts on evidence Stradbroke Parish Council - Planning Committee 3rd June

CE

Chris Edwards
Wed 2019-06-05 11:38

- 'David Smith';
- 'Stradbroke Parish Council';
- 'Carol & Don Darling';
- 'Jeremy Fox';
- 'James Hargrave'

APS - comparison cost MMC and traditional.pdf
589 KB

Dear all

The issues raised by David are national ones and not new. The traditional construction sector is now adapting rapidly. There is a huge push to consider alternative means of construction. see

<https://www.parliament.uk/documents/lords-committees/science-technology/off-site-manufacture-for-construction/off-site-manufacture-construction-ev.pdf>

Reference the submission from Trowers and Hamlins p522, regarding a volume housebuilder's experience. Trowers are the leading solicitors in off site legal matters and at the heart of this movement, and I think we can trust what they say below regarding time efficiency, build quality and focussed procurement.

“On the Berkeley Homes development, Kidbrook Village in Greenwich, **a whole row of terraced housing was constructed at twice the speed of a traditional build. Customers have confirmed that they cannot tell whether these have been constructed using off-site fabrication. Berkeley have been so impressed by their experience at Kidbrook using a third party manufacturer that it has now secured a 165,000 square foot site in Kent to build a factory that will produce its new modular project delivering initially 1,000 units per year for Berkeley Homes projects.”**

That scheme of course involved massive demolition and clearance works prior to construction.

The benefits are not simply to large housebuilders though. I can verify the effectiveness of the off site process having commissioned one of the first modular airspace schemes in Tower Hamlets. This required craning off site built modular flats on to the roof of 2 traditional brick built 1930's (4 storey) blocks of flats in Poplar. In spite of the logistical challenges of doing this in a very confined setting the development costs were massively lower than a traditional build, which also would not have been possible due to load bearing constraints. As my organisation was a medium size Housing Association we did not benefit from scale cost benefit but worked to secure a value for money deal with the contractor.

Some evidence of the cost benefits of off site build is attached. This was written in 2009 and the true cost of traditional build is laid out. A significant percentage of traditional build cost is waste and waste removal, this is almost completely removed from off site construction, the actual cost of construction is much lower, the opportunity cost of the construction time is significantly reduced and ..traditional contractors can subcontract that process, meaning they can maintain their core business

So there are problems and there are solutions to most of them.

Kind regards

Chris.

From: Chris Edwards

Sent: 05 June 2019 09:47

To: 'David Smith'; 'Stradbroke Parish Council' <stradbrokepc@outlook.com>; 'Carol & Don Darling'; 'Jeremy Fox'; 'James Hargrave'

Cc: 'Jason Vince' ; 'Billy Clements'; 'neil hadingham'; 'Zoe Snape'; 'Julie Flatman (Cllr)' <Julie.Flatman@midsuffolk.gov.uk>

Subject: RE: Stradbroke Parish Council - Planning Committee 3rd June

Dear David

I note your Land registry statistics for Mid Suffolk on slide 8 are for all properties. The ONS website is a goldmine of information and you can tailor your search for metadata as I have done in the following that examines new build properties in Mid Suffolk for q1 2018 to Q1 2019.

<http://landregistry.data.gov.uk/app/standard-reports/download-report?utf8=%E2%9C%93&report=avgPrice&areaType=district&area=MID+SUFFOLK&aggregate=none&period%5B%5D=2019-Q1&period%5B%5D=2018-Q1&period%5B%5D=2018-Q2&period%5B%5D=2018-Q3&period%5B%5D=2018-Q4&age=new>

This shows the actual sales price uplift in percentage terms over the 12 months Q1 2018 to Q1 2019. The sales values data for terraced houses is especially interesting as there is a near 9% yearly change, albeit that sales volume has reduced like for like.in the quarter 1 periods by 5.4%. Detached houses also performed well. Flats and semi detached homes are the main losers and so we must conclude that adjusting the mix is the key to making this work rather than adding more houses, and that is something we can of course consider as part of an on going discussion.

Taking your cost analysis on slide 9 over the same period if we assume a rebase to zero for 1 Jan 2018 costs have uplifted by 4.5% whereas a developer who selected the right mix would have seen sales values outstrip those costs by a possible 4-5%

Curiously (or perhaps not) that particular mix of detached houses and terraced homes is found in the Ash Plough scheme. That development is acknowledged to offer what the market wants but it does of course have massive design drawbacks in

respect of the small estate roads, badly designed common external areas and a package waste treatment plant meaning that homes are tied to a management company that is now completely divorced from the developer. These are all improvement points reflected in the generic Neighbourhood Plan policies.

The AECOM appraisals examine the benchmark and threshold land values for bringing forward land for development. In them land value is appraised on net developable area although the summary table in the viability study sets out both net and gross area land values. The purpose of these studies was to inform us on site viability regarding imposition of obligations and in this site affordable housing held it down, and so the site policy was written as it was to allow flexibility on that matter, all points previously made.

The DAT is a tool to analyse residual land value. Earlswood's like for like response to the results in the AECOM appraisals can reappraise the scheme. That does not require an external consultant, it is something that can be done in house – the DAT is an open source tool.

<https://www.gov.uk/government/collections/development-appraisal-tool>

I was perhaps expecting that Earlswood would write a new DAT to update the AECOM on cost and sales but like for like on mix to show impact on residual land value and then compare it with the Earlswood mix for the same or about the same bespoke sales footage equating to 76 homes.

Only then could we see if an Earlswood scheme really does not work based on your market sales driven analysis of home mix demand and its impact on land value, land price paid being irrelevant. It is for Earlswood to supply that evidence not for us to rehash the AECOM assessment. As these appraisals are normally extremely sensitive to variance you could perhaps run a range of appraisals for a variety of mixes of detached and terraced houses for approximately 76 homes to see if that can work, with a much reduced number of flats?

I finish with another extract from ONS, showing how based on the above statistics, Mid Suffolk (as ever) has its own market profile that does not reflect the national trend in any way. However the point about market values of flats and maisonettes is nationally consistent and that is significant, although as the market price reduces sales volume increases, suggesting the flats were overpriced in the first place, not that there was no demand for them.

Kind regards

Chris

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Source:

<https://www.gov.uk/government/publications/uk-house-price-index-england-march-2019/uk-house-price-index-england-march-2019>

Across England, all houses showed an increase in average price in March 2019 when compared with the same month in the previous year. Semi-detached houses showed the biggest increase, rising by 2.5% in the year to March 2019 to £229,000. The average price of flats and maisonettes fell by 0.8% in the year to March 2019 to £222,000.

All dwellings

Local authorities	March 2019	March 2018	Difference
Mid Suffolk	£267,682	£263,452	1.6%

From: David Smith

Sent: 04 June 2019 18:05

To: Chris Edwards; 'Stradbroke Parish Council' <stradbrokepc@outlook.com>; 'Carol & Don Darling' ; 'Jeremy Fox' ; 'James Hargrave'

Cc: Jason Vince ; 'Billy Clements'; Neil Hadingham; 'Zoe Snape'; 'Julie Flatman (Cllr)' <Julie.Flatman@midsuffolk.gov.uk>

Subject: RE: Stradbroke Parish Council - Planning Committee 3rd June

Dear Chris / PC Sub Committee,

Thanks again for your time yesterday. It was a useful discussion and we hope we were able to answer most of the questions that you raised.

In terms of the meeting, we were unable to remain throughout the closing stages but understand that some additional concerns / comments were made following our departure. With that in mind, I would like to provide some further feedback now and ensure that the PC have all the available data when reviewing how to move forward.

Earlswood Homes Costs

It was reported that Chris had mentioned that developers of our size, have the flexibility to manipulate costs and are lower than the larger National House Builders, implying that some savings were available but not included in our presentation.

We do not subscribe to this view. Whilst our workforce is not as large as the national developers and our associated total overhead wouldn't run anywhere near to the same level, we would find it very unusual if the office/staff overheads were significantly different per capita.

There was also another important point, that seems to have been omitted from the same discussion which, in the interests of fairness and balance, I duly provide below.

Labour cost as mentioned above, is only one part of the equation. The most important parts are the cost of materials & specialist services which represent approx. 70% of the entire build cost.

Due to the scale of their operations, the National House Builders have considerable advantages in terms of these procurement costs. Based on the feedback that we have received from some of the national suppliers that we work with, the National House Builders currently enjoy procurement costs

approx. 30-40% below our costs. This is quite normal for developers building circa 10,000 units p/a vs our current 150 units p/a. This essentially means that whatever unsupported comments may have been made by Chris after we left, the reality is that our total build costs are well above those of the larger developers and our costs also increase at a faster rate. As you'll appreciate, due to our size, our scope to minimise contract prices versus the National House Builders is quite different, and many of them could well be achieving static pricing for 24-36 months periods, with +5/-5% ROE mechanisms built in to mitigate most of the Rate of Exchange impacts to date.

As per our presentation, we have provided credible backup data to support all points raised. There are material cost differences in what AECOM have assumed and where the industry now finds itself. We estimated min +£726k of costs against the 76 unit incl 10% Affordable scheme but this could well be twice that by the time the scheme is built.

If you add that to the loss of £1.2mil in Sales Revenue, we'd need to find circa £2mil in cost savings to stand still. We're more than happy to review any proposals the PC have in that respect, keeping in mind that the variance only allows for changes to date. If trends continue, we could well have a total variance of £4mil to work through in 2-3 years time.

Clearly, any comments to the contrary of our evidence must also be supported by credible evidence, in order for the PC to be confident that they are taking a decision from an informed position. We trust this will be the case, as we would also need to discuss those points further with the LPA, during any pre-app / planning discussions.

Upscaling Risks to other Allocated Sites

We understand that the perceived risks of granting additional units on one scheme and how that may make defending adherence to the other allocated sites more difficult to achieve but I would ask all members to face the reality of the situation.

The numbers speak for themselves. If the returns were currently attractive enough to support, there would be many developers snapping up the allocated sites available.

What we observe however, is yet more applications for Outline Planning Permission that are not being applied for by Housing Developers but rather private parties and speculators, hoping to gain planning permission and make an uplift on a potential land sale. Given it is your responsibility to deliver the Neighbourhood Plan, I would encourage you to ensure that developers are actually underpinning applications on those sites and the units will be brought forward in a timely manner. A failure to bring them forward would not only jeopardise your Neighbourhood Plan's ability to control development but may also contribute to an under-performance against 5 supply and more importantly, 3 year deliveries for the Mid-Suffolk district.

I've spent 20 years negotiating deals but in my experience, it's usually better in a weak market to work with what you have versus waiting for something theoretical to arrive, as it may well not.

Planning Application Timing (additional point)

Both ourselves and the land owner have discussed the merits of delaying our 5 year option to what we hope would be a better period to remove some risk. We are both comfortable to do so but that could potentially mean delaying deliveries for 6-8 years depending on planning progress.

Missing Application (Outline DC/19/00022 60 units)

During the meeting, it was mentioned that we had missed a large site off the bottom of our page. Upon further checks, we discovered that the software we use to support our processes (Land Insight) have applied a data point with a 'minor' impact inference rather than a 'major' impact inference. Please see green arrow and legend shown on the picture below.

This omission was not intentional on our part, as we would usually associate these smaller dots with new single dwellings or home extensions and therefore, excluded them from our analysis of 5+ Unit applications. We apologise for any confusion caused and have taken this issue up with the software provider accordingly.

Thanks & Regards
David Smith
Regional Director - East Anglia
www.earlswoodhomes.com

From: Chris Edwards
Sent: 03 June 2019 09:19
To: David Smith ; 'Stradbroke Parish Council' <stradbrokepc@outlook.com>; 'Carol & Don Darling'; 'Jeremy Fox' ; 'James Hargrave'
Cc: Jason Vince ; 'Billy Clements' Neil Hadingham; 'Zoe Snape' ; 'Julie Flatman (Cllr)' <Julie.Flatman@midsuffolk.gov.uk>
Subject: RE: Stradbroke Parish Council - Planning Committee 3rd June

David,

Thank you for your email. My apologies for the delay in responding as I have been away with limited internet access.

Attendees other than those circulated above will be members of the public and we cannot predict who will come, we look forward to meeting with you tonight.

Kind regards

Chris

From: David Smith
Sent: 29 May 2019 16:16
To: Stradbroke Parish Council <stradbrokepc@outlook.com>; 'Carol & Don Darling'; 'Jeremy Fox' ; Chris Edwards; James Hargrave
Cc: Jason Vince ; 'Billy Clements' ; Neil Hadingham; 'Zoe Snape' ; 'Julie Flatman (Cllr)' <Julie.Flatman@midsuffolk.gov.uk>
Subject: RE: Stradbroke Parish Council - Planning Committee 3rd June

Hi Odile,

Just to advise that we will prepare a few slides to give the PC some background on Earlswood Homes and where we feel the greatest challenges lie however, we would stress that we regard this as an initial meeting to discuss the priorities for the PC / Stradbroke Primary School. We will therefore not be presenting a draft layout / scheme, as this would only be produced once the input of attendees had been considered.

With regards to the meeting attendees, we would be grateful if you could circulate the list accordingly.

Thanks & Regards
David Smith
Regional Director - East Anglia
www.earlswoodhomes.com

From: Stradbroke Parish Council <stradbrokepc@outlook.com>
Sent: 21 May 2019 21:35
To: David Smith; 'Carol & Don Darling' ; 'Jeremy Fox' ; Chris Edwards ; James Hargrave
Cc: Jason Vince; 'Billy Clements'; Neil Hadingham; 'Zoe Snape'; 'Julie Flatman (Cllr)' <Julie.Flatman@midsuffolk.gov.uk>
Subject: Stradbroke Parish Council - Planning Committee 3rd June

Please find attached an agenda for the meeting on 3rd June.

I am on holiday from now until the 31st May.

Any documents submitted will be uploaded to the Parish Council website on 1st June.

Thank you.

Regards

Odile Wladon

Clerk

Stradbroke Parish Council

Mobile: 07555 066147

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From: David Smith

Sent: 21 May 2019 21:31

To: 'Carol & Don Darling'; 'Jeremy Fox'; 'Stradbroke Parish Council'; Chris Edwards

Cc: Jason Vince; 'Billy Clements'; Neil Hadingham; 'Zoe Snape'; 'Julie Flatman (Cllr)'

Subject: RE: Stradbroke Parish Council Planning sub committee Monday 3ed June

Hi Chris,

Tks yours. Confirm we will send a file across prior to the 29th. Enjoy the break.

Tks & Rgds

David

Sent from my mobile

--- Chris Edwards wrote ---

Hi David,

Thank you for confirming attendance.

The Committee will discuss your proposals and form a view. If you want to provide evidence in advance to support your position we welcome that. I am away from 23 returning on Saturday 1st June. Please forward details to the Clerk for circulation with the meeting papers. They will go out on the Wednesday prior, ie May 29th.

The site was promoted extensively in its present form at reg 14 and reg 16 stage prior to it being submitted for examination and all evidence used to make the plan has always been publicly available. You can find on the parish NP website representations from other landowners of sites which were considered and rejected, the point being there was a public awareness of the process.

<https://www.stradbrokepc.org/neighbourhood-plan-documents>

The Neighbourhood Plan is what it is. I did not make it. The site policies are what they are. This is the plan the village voted on.

Kind regards

Chris

From: David Smith

Sent: 20 May 2019 19:47

To: Chris Edwards; 'Carol & Don Darling'; 'Jeremy Fox'; 'Stradbroke Parish Council' <stradbrokepc@outlook.com>

Cc: Jason Vince; 'Billy Clements'; Neil Hadingham; 'Zoe Snape' ; 'Julie Flatman (Cllr)' <Julie.Flatman@midsuffolk.gov.uk>

Subject: RE: Planning sub committee pre meeting with developer

Hi Chris,

Thanks yours. I can confirm that Earlswood Homes will be in attendance. Assuming that Neil/Zoe are also able to attend, they would be in the public area.

Thanks for your additional comments and NPPF extracts. We aware of your position concerning the perceived over paying for land and also acknowledge your comments on the £240,000 potential car park saving etc. I would stress that those items are already factored in and are not the real issue here. It is simply a case of changes in actual cost and revenue trends, that have occurred since the AECOM numbers were produced. The resulting variances for the proposed NP schemes are in the £ millions, which, using the HCA Development Appraisal Tool, show that the delivery of Neil's site (and many other NP sites) would not be possible as per original expectations. These are material changes that cannot be ignored and will clearly have a bearing on the final scheme delivered.

Your current position on quoting NPPF guidance suggests that the PC should be completely dismissive of such cost & revenue changes. This is somewhat difficult to understand given what is happening in our industry and the confidence risks associated with BREXIT. As you will also be aware, these risks were not considered in the AECOM analysis. In fact, unless I have missed it, the NP makes no reference to BREXIT or perceived risks at all (please confirm). Clearly, between now and 2036, more cost / revenue changes will occur and will have to be considered in the same way by developers and the district councils alike.

We hope that the PC will find a way to take a pragmatic approach to the challenges ahead and will be part of any solution introduced. The objective here is to bring a workable scheme of much needed housing forward at this important site, rather than to hide behind a narrow interpretation of NP & NPPF policies to its detriment.

If you are not keen to discuss these points at the meeting, it would be helpful if you could explain the PC's current resistance to acknowledging the current challenges/risks. Please support your comments with updated AECOM numbers for Build Cost, Car Park size and Sales values including related sources.

Meantime, we are looking forward to meeting you and the sub-committee on 03-Jun. From our side, we would like to cover the below mentioned points. In terms of delivery, it may be easier to project supporting info onto a wall if you have a projector, alternatively, we could bring a 42inch flat screen over. We would just need a table to stand it on.

EHH Draft Points

1. Introduction to Earlswood Homes. (JV)
2. Considerations / timelines relating to our proposed scheme. (DS / BC)
3. Stradbroke Primary School Priorities / Timelines (?)
4. Discussion on other Stradbroke PC priorities (CE)

Thanks & Regards
David Smith
Regional Director - East Anglia
www.earlswoodhomes.com

From: Chris Edwards
Sent: 17 May 2019 11:53
To: David Smith; 'Carol & Don Darling'; 'Jeremy Fox'; 'Stradbroke Parish Council'
<stradbrokepc@outlook.com>
Cc: Jason Vince; 'Billy Clements'; Neil Hadingham; 'Zoe Snape' ; 'Julie Flatman (Cllr)'
<Julie.Flatman@midsuffolk.gov.uk>
Subject: Planning sub committee pre meeting with developer
Importance: High

Hi David,

We can confirm the Planning Committee meeting for the proposed date and time Monday 3rd June at 1730 PM (venue to be confirmed). As with all formal Parish Council committees this will be a council meeting held in public and not a public meeting. The way it will run is that Committee shall attend to the Parish business – your proposals – and ask questions and discuss what you have to say. Stradbroke Primary school will be an invitee/stakeholder. Please advise if the landowner is to be part of the invited discussion or will sit in the public area. If the contractual arrangements are still unresolved there is every possible reason for him to be part of the Committee group discussions. If not then I suggest it would be better for the landowner to sit with the public.

The public will be invited to comment after we have had our discussions. I feel it is fair to say now that you can expect considerable opposition. However it will not be acceptable for members of the public to interrupt or disrupt our discussions and if that happens they will be asked to leave. Members of the public will be given ample time to comment during the public forum. It makes sense for that to take place after the public has heard the committee discussions.

Invitation to this meeting does not presuppose any outcome. The Committee will form a view based on the whole meeting The committee will make a recommendation to the main Parish Council the following week.

Other matters: I do not want to get caught up in a distraction debate on relative merits of inputs for viability appraisals. We noted at an early stage of our correspondence and dialogue the significant cost reduction of shrinking the car park by 2000 sq mtrs. This is not only a reduced land take and a development cost removed but also an increased development area of 0.2 ha which provides for a minimum of 4 additional dwellings at a low DPH. I would simply point to Government guidance on the issue of viability from 9th May 2019

https://www.gov.uk/guidance/viability?utm_source=ece7d74b-7222-430b-8fb2-244f051008a1&utm_medium=email&utm_campaign=govuk-notifications&utm_content=immediate

“It is the responsibility of site promoters to engage in plan making, take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies. The price paid for land is not a relevant justification for failing to accord with relevant policies in the plan. Landowners and site purchasers should consider this when agreeing land transactions.”

In view of Earlswood’s determination to promote a scheme that falls well outside the development policy limits set by the recently made Stradbroke Neighbourhood Plan, I can only ask again please that you confirm attendance at this meeting by next Tuesday 21st May so that it can be advertised in the Parish magazine to ensure widest possible awareness of the meeting.

Kind regards

Chris Edwards

Cc; Cllr Julie Flatman

Bcc:

Melanie Barrow , Executive Head Teacher, Stradbroke Primary School
James Hargrave , Chair All Saints Schools Trust

.

From: David Smith

Sent: 16 May 2019 10:24

To: Chris Edwards; 'Carol & Don Darling'; 'Jeremy Fox'

Cc: 'Parish - Stradbroke' <StradbrokePC@outlook.com>; Jason Vince; Billy Clements ; Neil Hadingham

Subject: RE: Planning sub committee pre meeting with developer

Hi Chris,

Thanks for the follow up on this. Confirm we have no issues with the public nature of the meeting, though would add that we will be making a case for a larger scheme due to viability issues associated with the 75 unit scheme. Our numbers demonstrate that a scheme of circa 100-110 units with 0-5% Affordable housing would be required to deliver this site.

In order to have meaningful discussions, please re-evaluate the AECOM numbers using an Open Market sales prices of £235 / SQF (Houses) and latest Build costs for our region. Car park assumed at 1000 SQM instead of the 3000 SQM used by AECOM.

Affordable / Shared ownership housing prices should also be adjusted also by a similar ratio.

Thanks & Regards

David Smith

Regional Director - East Anglia

www.earlswoodhomes.com

From: Chris Edwards
Sent: 16 May 2019 09:16
To: 'Carol & Don Darling'; 'Jeremy Fox'; David Smith
Cc: 'Parish - Stradbroke' <StradbrokePC@outlook.com>
Subject: Planning sub committee pre meeting with developer
Importance: High

Dear all

Can we all make a date for the Monday 3rd June?

In view of concerns about openness etc I propose this to be a sub committee with public invited and not a working group , it will not be as simple or relaxed as a working group but will allow for expression of views at an early stage and therefore hopefully no surprises. I hope that is ok.

Can everyone make 1730 start time? Please reply asap and Odile can do what she needs to as she is away shortly. Thanks

Chris

From: David Smith
Sent: 14 May 2019 11:18
To: Chris Edwards; Neil Hadingham
Cc: 'Parish - Stradbroke' <StradbrokePC@outlook.com>
Subject: RE: PC update

Hi Chris,

Thanks for the note. Good to see the formation of this sub-committee. I'll need a few days to confirm availability / attendees but it looks ok from my side. As we would have people travelling back to Surrey afterwards, it would be helpful if it could start around 5-5.30 pm.

Thanks & Regards
David Smith
Regional Director - East Anglia
www.earlswoodhomes.com

From: Chris Edwards
Sent: 14 May 2019 08:33
To: David Smith; Neil Hadingham
Cc: 'Parish - Stradbroke' <StradbrokePC@outlook.com>
Subject: PC update

Hi both,

Following last night's PC meeting we have a new committee structure which includes an appointed planning sub committee of which I am chair and it was agreed to take

pre planning submissions through this group. It was suggested it could meet prior to main PC meetings and report back. It would be recommendatory.

The Next PC meeting is 10th June and papers are usually sent out the Wednesday prior , may I suggest the 3rd June as a possible date for an initial meeting of the planning sub committee? Can you hold the date pending confirmation this end but also confirm back to Odile the Parish Clerk if this is a possible option for your group? It is likely to be an evening meeting however we can try and look at availability earlier in the day if you wish.

Odie can you circulate this to the PC sub committee? Time is if the essence here. Many thanks

Chris