



**Education Report:** 

Proposal to establish Rise UP Academy as a designated character school in Mangere, Auckland

То:	Hon Chris Hipkins, Minister of Education		
Date:	3 July 2018	Priority:	High
Security Level:	In Confidence	METIS No:	1128941
Drafter:	Philippa Pidd	DDI:	4
Key Contact:	Katrina Casey	DDI:	
Messaging seen by Communications team:	Yes	707	S9(2)(a) OIA

## Purpose of Report

The purpose of this report is to provide advice to you to assist you in deciding whether to:

**Establish** Rise UP Academy as a Year 1-8 state primary school under section 146 of the Education Act 1989, and designate it under sections 156(1) and 156AA as a designated character school, if you are satisfied it meets the requirements of section 156(4) of the Education Act 1989.

### Summary

- This report seeks your decision on the proposal to establish Rise UP Academy (the proposed school) as a state school under section 146 of the Education Act 1989 (the Act), and designate it as a designated character school under sections 156 and 156AA of the Act. The proposed school would be located in Auckland.
- 2. The report provides you with two options. You could defer your decision until we can advise on the availability of property for the school by late August, or you could decline the proposal.
- 3. The charter school currently operates from leased accommodation at 22 Rosella Road, Mangere East. The lease is due to expire in July and the sponsor is negotiating a short-term lease to cover the remainder of 2018.

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4. We recommend you defer your decision due to the current uncertainty about property until we have more certainty about the future location of the school.

### The proposed school

5. The proposal to establish the designated character school has come from Rise UP Trust (the applicant), the current sponsor of the partnership school | kura hourua (charter school) The Rise UP Academy, which opened in 2014. The applicant proposes that the school be a Year 1-8 primary school and indicated that in the future it would like to apply to change the class of the school so it could enrol Year 9 and 10 from 2022.

#### Designated character

- 6. Section 156(4) of the Act sets out the requirements for the establishment of a designated character school as:
  - a. the designated character school will have a character that is in some specific way or ways different from the character of ordinary state schools
  - b. it is desirable for students (whose parents want them to do so) to get such an education
  - c. students at the school will get an education of a kind that differs significantly from the education they would get at an ordinary state school.
- 7. The designated character of the proposed school is described as embracing Pacific uniqueness in an intergenerational learning environment. Parents and whānau, as well as students, are learners. It uses a Pacific inquiry-based model incorporating critical thinking in authentic Pacific contexts for learning experiences. The school will use Pacific pedagogy to teach *The New Zealand Curriculum* (NZC).
- 8. If approved, it will be the first designated character primary school in New Zealand that is Pacific in character. Pacific-based pedagogy is explicit throughout the curriculum plans submitted by the applicant.
- 9. The character and vision of the proposed school is such that students will get education of a kind that differs significantly from the education they would receive at an ordinary state school. There are no schools in the area with a similar character, there is demand for this provision, and we consider that the character is compatible with the NZC.
- 10. We consider that the applications fit with the context of section 145AAA and the requirements of section 156(4) of the Act. Annex 4 provides an assessment of the application. The consultation process required by section 157 has been completed and therefore this application is ready for your consideration.
- 11. The Ministry's view is that this application meets the requirements to be a designated character school. We have not yet however been able to secure suitable property for it to operate from.

#### Consultation on the application

- 12. We consulted 18 schools whose rolls might be affected by the establishment of the proposed school. Sector groups were also consulted.
- 13. Five responses were received. One response supported the increase in parental choice which would result from this school's establishment, two noted concerns about the quality of learning at the charter school, and one had no comment. Refer to Annex 7 for a summary and copies of the individual submissions.

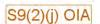
14. The applicant has provided letters of support from a number of members of its community. It has also considered the feedback provided from the two schools that have commented and from NZEI, and provided further comment in response to the concerns raised. This is also included in Annex 7 to this report.



## **Risks and Mitigations**

21. In analysing the application the following risks, and their mitigations, have been identified:

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b.

- c. Should you decide to defer a decision until it is clear where the school will be located for 2019, it may be too late to appoint the EBOT and for them to appoint staff for the start of the year and would create uncertainty for families and students who are looking to enrol at the proposed new school. The proposed school does not have to open at the beginning of 2019 it could open any time in 2019. The Ministry would support students from the charter school to transition to other state schools in the local network.
- d. If you agree to defer we will provide you with an updated report on whether suitable accommodation is available and next steps (by 1 August).

e.

If the proposal is declined

S9(2)(j) OIA

S9(2)(j) OIA

f. If you decide to decline the application we will support students to enrol at local state schools. We will also work with the schools that receive the students to support a smooth transition for them.

## **Next Steps**

- 22. Should you decide to defer a decision until it is clear where the school will be located for 2019, it may be too late to appoint the EBOT and for them to appoint staff for the start of the year and would create uncertainty for families and students who are looking to enrol at the proposed new school. The proposed school does not have to open at the beginning of 2019 it could open any time in 2019. The Ministry would support students from the charter school to transition to other state schools in the local network.
- 23. If you agree to defer we will provide you with an updated report on whether suitable accommodation is available and next steps (by late August).

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25.

If the proposal is declined

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26. If you decide to decline the application we will support students to enrol at local state schools. We will also work with the schools that receive the students to support a smooth transition for them.

### **Estimated funding requirements**

27. The proposed school would be entitled to an establishment grant of \$490,559 based on the notional roll of 100¹ (this is the same as the maximum roll). If you decide to establish the proposed school, the estimated annual operational costs to the Crown (staffing and operational funding for a roll of 100) is

## Estimated Operational costs - based on a roll of 100

Item	Estimated amount
Operational funding – annual payment	\$208,886
Staffing – 5.16 FTTEs – annual payment	\$418,093
Lease costs – annual (on current site) S9(2)(j)	OIA
Estimated Operational Funding per annum:	
Establishment funding – one off payment	\$190,638
Establishment staffing* cost of teacher salaries (6 months)	\$130,171
Furniture and Equipment funding – one off payment	\$145,750
Transition Funding (cost of paying teaching staff above scale)	\$24,000
Establishment Costs:	\$490,559

Note: Figures exclude GST.

## Ministry recommendation

- 28. We consider that the requirements of sections 146, 156 and 156AA of the Act have been met. We are uncertain that we will be able to secure accommodation for the school opening at the beginning of 2019.
- 29. Should Rise UP Academy be established as a designated character state school it would have a character that is different to that of ordinary state schools, there are parents who want that character and it is desirable for students to access such character. Through this different character the students will get an education of a kind that differs significantly from the education they would get at an ordinary state school.
- The proposed curriculum of Rise UP Academy is a strength based programme that foregrounds Pacific cultural values and community connectedness. It is strongly aligned to principles, values and learning expectations of *The New Zealand Curriculum*. We consider that the school needs to do more work in some areas but that this can be supported by the governance facilitator and the EBOT prior to the school opening. The Educational Review Office (ERO) will ensure these matters have been addressed in its pre-opening readiness review.

<sup>\*</sup> Prior to the school opening, the establishment board can appoint a principal and senior teachers.

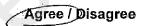
<sup>&</sup>lt;sup>1</sup> The notional roll is an estimated future roll used to provide a minimum level of funding and staffing entitlements during the establishment period of a new school.

- 31. The applicant is aware of the ERO requirements for the new school to provide a quality curriculum, and that the readiness review will be used by the Ministry to provide assurance that any remaining areas of concern have been addressed.
- 32. If you decide to defer the application you are asked to sign the attached letters to the applicant and the local MPs (Annex 1A), decline letters are attached as Annex 1B.
- 33. You have the absolute discretion under section 156(3) to decline this application and not establish this designated character school.
- 34. A media statement will be developed that reflects your decision.

#### Recommended Actions

The Ministry of Education recommends you;

a. **defer** the establishment of Rise UP Academy as a Year 1-8 primary school until we provide you with further advice about accommodation.

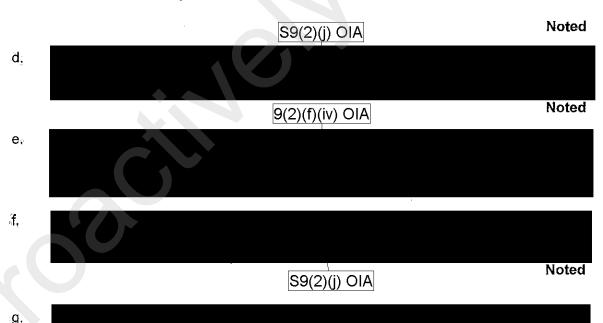


note that the Ministry is currently negotiating with the landlord of 22 Rosella Road about leasing the site for the next 3-5 years

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Noted

note that establishment on the leased site is conditional upon successful negotiations between the Ministry and the landlord;



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h. agree that this Education Report is proactively released once final decisions have been made on all applications from the sponsors of charter schools. When the report is released, any information which may need to be withheld will be done so in line with the provisions of the Official Information Act 1982;

6

Noted

Agree / Disagree

If you decline the proposal, the Ministry of Education recommends you:

- sign the attached letters to the applicant and letters to local Members of Parliament, and return the letter to the applicant to the Ministry to be delivered by Ministry staff; and
- note that a draft media release will be developed that will cover all applications from former charter schools.

Katrina //asey

Deputy Secretary

Sector Enablement and Support

3,7,2018

Chris Hipkins

Minister of Education

15/7/18

I would like a fill analysis of alknowive accommodation ophisms should correct negotiations prove unsuccessful.

I'd also like walk on establishing the school to continue in the meantime. Having read the documentation, I feel in a position to approve the school once accommodation opposite to approve opposite the school once accommodation.

## Proposal for Establishment as a Designated Character School

- We have received an application from Rise UP Trust (the current sponsor of the charter school The Rise UP Academy) for the establishment of a designated character state school, also to be known as Rise UP Academy (the proposed school).
- 2. The proposal is that the school offers Year 1-8 education in a co-educational setting in Auckland. The applicant would like the school to become Year 1-10 in 2022. The proposal is attached as Annex 6.
- Section 145AAA of the Act states that the purpose of Part 12 of the Act (which is focused on changes to the schooling network, including the establishment of schools) is to:
  - a. enable the provision of a schooling network that assists parents to meet their obligations to enrol their children at school; and
  - b. assist the efficient and effective use of the government's investment in schooling; and
  - c. recognise the role of diversity in the provision of schooling, including the provision of Māori medium education.
- 4. Under sections 156 and 156AA of the Education Act 1989 (the Act), you have the ability, when establishing a state school under section 146 of the Act, to designate the school as a designated character school. This ability is at your absolute discretion. To establish a new designated character school you must be satisfied that it meets the requirements in section 156(4) of the Act. The three key requirements are:
  - a. the designated character school will have a character that is in some specific way or ways different from the character of ordinary state schools
  - b. it is desirable for students whose parents want them to do so to get such an education
  - c. students at the school will get an education of a kind that differs significantly from the education they would get at an ordinary state school.
- 5. In 2001, the Cabinet Education and Health Committee issued guidelines for the establishment of state integrated and designated character schools (EHC Min (01) 7/5 refers). The purpose of these was to make Government intentions in establishing these types of schools more transparent to applicants. The guidelines cover expected school size, and impact on the schooling network. However, the Minister may still establish a school if it does not meet these guidelines. We have assessed the applicant's proposal against these guidelines, attached in Annex 4.

#### Designated character

6. We consider that the applicant's proposed designated character is different in specific ways from the character of ordinary state schools, through their reflection of Pacific culture, intergenerational learning and critical thinking in Pacific contexts.

7. The designated character for the proposed school includes an approach to teaching and learning that differs from that of ordinary state schools. The applicant has provided the following description:

Rise UP Academy embraces Pacific uniqueness in an intergenerational learning environment. Parents and whānau, as well as students, are learners.

A Pacific inquiry-based model uses critical thinking in authentic Pacific contexts for learning experiences. The Academy will use Pacific pedagogy to teach the New Zealand curriculum.

Learning is based in cultural concepts embedded in Pacific cultures:

- Lalanga (Tongan) To weave. Weaving an inclusive co-construction and delivery of education within an authentic inquiry learning context. Teaching the requirements of the NZ curriculum with Pacific experiences, strengths, and knowledge. Pacific Inquiry Learning is critical thinking based in distinctive Pacific culture. Shared cultural foundations such as whānau, fesosoani/auaunaga (service/help), tuakana-teina (intergenerational support) and fa'aaloalo (respect) are used to train students in critical thinking.
- Malaga (Samoan) To journey. Nurturing students and families to coconstruct their journey on the education pathway. Whānau discover their unique identity and learning styles. A classroom mentoring program mentors parents in practical life skills and connects them to social services as needed. This removes barriers to education. Supporting parents in their journey helps to create learning environments to support and accelerate student learning.
- Maaga (Niuean) Our village. It takes a village to raise a child.
  Community leaders and families watch over students' educational
  milestones. Rise UP connects families with the M\u00e4ngere community,
  and recognises community leadership is required to improve
  educational outcomes. School events celebrate local identities and
  talents.
- 8. The designated character is woven into the curriculum plans submitted by the applicant. The three components of the special character (Lalanga, Malaga and Maaga) form the basis for the Rise UP Pacific Inquiry Learning Education model.
- 9. If approved, it will be the first designated character primary school in New Zealand that is Pacific in character.

#### **Educational considerations**

- 10. ERO has established evidence based indicators that focus on the things that matter most in improving student outcomes in schools. We have used ERO's indicators from two domains to guide our review of the curriculum the proposed new school:
  - Domain 3: Educationally powerful connections and relationships
  - Domain 4: Responsive curriculum, effective teaching and opportunity to learn

- 11. The proposal describes how the proposed school will align teaching and learning programmes with the NZC. Its stated approaches to teaching and learning include 'Pasifika inquiry based learning using a co-constructivist approach'. The proposal lists all learning areas of the NZC, provides annual curriculum topic overviews but then only identifies four learning areas within the Rise UP Academy's model of learning. We advise that the school undertakes a curriculum mapping exercise across its curriculum topic overviews to clarify that all students have the opportunity to learn, achieve and progress in the breadth and depth of the national curriculum within their proposed woven curriculum design.
- 12. A key feature of the proposed curriculum delivery is the expectation that families and communities will be deeply involved in their child's education. The local curriculum will be co-constructed and outcomes for Years 1, 6 and 8 are described for both students and their families. The Pacific values and competencies align closely with those in the NZC. There is potential for strong community collaborations that will support students' resilience, cultural connectedness and success as Pacific learners.
- 13. The proposed plan indicates that a learning conversations approach will be used to report on children's progress every 6 months or quarterly. The school intends to use formal and informal tests and assessments that will be compared and analysed for student and school achievement goals and targets. The proposal also states that assessment is just as important as inquiry. The Ministry is not clear about how assessment for learning will inform teachers' decisions about next steps in their teaching programmes or be used to develop students' assessment and learning-to-learn capabilities. We conclude that further work is needed on this area.
- 14. The applicant is aware of the Education Review Office (ERO) requirements which are for the new school to provide a quality curriculum and have a sound management system, intended to ensure quality educational outcomes for students.
- 15. If you approve the establishment of the proposed school, we will also appoint a governance facilitator to support the EBOT. One of the facilitator's functions will be to support the school in meeting the above curriculum requirements. We will also engage ERO to undertake a readiness review for the school. We will use the readiness review to provide assurance that the areas of concern above have been addressed.
- 16. We consider, subject to a curriculum mapping exercise and further work on the proposed assessment plan, that the applicant has articulated a sound approach to curriculum design and *teaching* and learning practice, and that:
  - a. it is desirable for students (whose parents want them to do so) to get an education in line with this designated character and curriculum design approach
  - b. students at the school will get an education of a kind that differs significantly from the education they would get at an ordinary state school.

## Projected rolls

17. We consider that the roll projections demonstrate a parental desire for this model of schooling and that the proposed designated character would provide choice for families who wish to access education of this type.

18. The July rolls at the charter school The Rise UP Academy (which provides a similar type of education) in the table below demonstrate parental support for this type of schooling provision.

	2014	2015	2016	2017	2018 (as of 1 March)
1 July roll	46	69	79	101	100

19. The applicant has provided the following roll projections for the proposed school. These projections are based on the assumption that each year group will follow through into the next school year. They will require a change in premises to cater for any roll above 100 students, due to current site constraints.

	2019	2020	2021
Projected roll	110	170	230

- 20. The number of students has steadily increased. Historic roll-based trend projections indicate that the roll at the proposed school would be 120 and 146 in March 2019 and March 2020 respectively (assuming alleviation of the site-based cap).
- 21. The school's roll is likely to be at least 100 students in the first year of operation, and based on trends to date, is likely to grow over the first three years of operations if a new site is identified.

# Impact on the Schooling Network

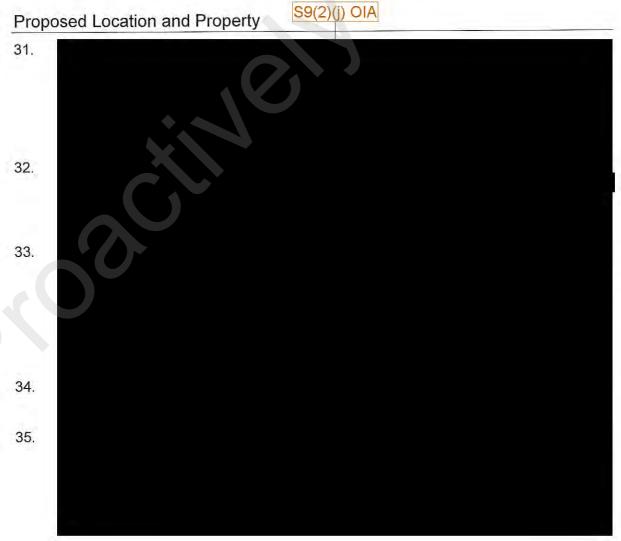
- 22. Mängere, South Auckland is an area of population growth, with many schools experiencing roll pressure. The Year 1–8 population (5 year olds to 12 year olds) in the Mängere catchment is expected to continue to grow significantly. Housing New Zealand has a focus on redeveloping its stock in the Mängere area within the next 10 years. This means that should these applications be approved, the impact on any one school is likely to be minimal and offset, over time, by school aged population growth.
- 23. It is likely that the proposed school will enrol students that are currently attending the charter school and will attract students that wish to seek an education with a specific Pacific character. In 2017 Māori (18%) and Pacific (71%) children made up 89% of the Māngere primary roll profile. The proposed school will provide significant further choice for parents seeking state primary schooling with a Pacific character.
- 24. We consider that if approved, the school will not have an impact on the primary school network in Mangere or wider South Auckland.
- 25. If the proposed school is established, it would be relatively small compared to other primary schools within the same network. Most of the primary schools have rolls of over 400 students. If you approved the application, no school would be made marginal and Year 8 students from the proposed school would be able to transition to several different secondary or composite schools for their secondary education.

#### Maximum roll

- 26. Under section 156(8) of the Act, the Secretary for Education must set a maximum roll for a designated character school, and the school's Board of Trustees must ensure the number of students enrolled at the school does not exceed the maximum roll.
- 27. The applicant has requested a maximum roll of 230 students until 2021 with the roll growing by 60 students per year thereafter due to an additional intake of Year 1 students during the year.

### Maximum roll based on school being established on existing site

- 28. The above roll projections for the proposed school suggest significant capacity for growth. The applicant has noted that it intends that the school will apply to offer schooling for Years 9–10 in 2022.
- 29. However, the current site of the proposed school is very constrained and we do not support increasing the roll from what the charter school offers now. Any subsequent application to expand the school's offering to Years 9 and 10 would need to include provision to accommodate these students.
- 30. We propose an initial maximum roll of 100 students to cater for current students at the charter school. If the school subsequently expands or changes its premises to accommodate more students, it can apply to expand its roll.



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## School Transport

39. School Transport Assistance would be provided for students that are eligible for this support. The Ministry is not currently providing school transport assistance to students of the charter school as suitable public transport is in operation.

## Financial Implications (operations)

- 40. If you decide to establish the proposed school, the following table shows the estimated costs to the Crown, based on the notional roll for the school as shown. It is usual practice to fund a new school on a notional roll in order to give the EBOT some certainty of funding in its establishment period. If the actual roll exceeds the notional roll, the school will be resourced on its actual roll; if the actual roll is lower than the notional roll, the school will be resourced on its notional roll. In this instance, because site capacity is likely to constrain school growth, the notional roll of 100 is highly likely to be accurate.
- 41. The proposed school would be entitled to an establishment grant of \$490,559 based on the notional roll of 100. If you decide to establish the proposed school, the estimated annual operational costs to the Crown (staffing and operational funding for a roll of 100) is \$\square\$S9(2)(j) OIA

### **Summary of costs**

42. A summary of estimated costs is provided in the following tables.

### Estimated Operational costs - based on a roll of 100

Item	Estimated amount
Operational funding – annual payment	\$208,886
Staffing – 5.16 FTTEs – annual payment	\$418,093
Lease costs – annual (on current site)	OIA
Estimated Operational Funding per annum:	
Establishment funding – one off payment	\$190,638
Establishment staffing* cost of teacher salaries (6 months)	\$130,171
Furniture and Equipment funding – one off payment	\$145,750
Transition Funding (cost of paying teaching staff above scale)	\$24,000
Establishment Costs:	\$490,559

Note: Figures exclude GST.

#### Governance

43. If you in the future agree to establish the proposed school, it will initially be governed by an EBOT. It is important to have an EBOT in place as soon as possible after establishment so that it can prepare the school for opening. Should you decide to defer your decision, following further advice on property availability, we will provide more information on the proposed EBOT in our next report.

### **Employment relations**

- 44. An essential initial task for the EBOT will be the appointment of the principal. It is anticipated that the principal will take up his/her position as soon as possible after appointment so that he/she may participate in the planning the framework and processes for the state school.
- The EBOT will appoint staff to positions at the proposed school. The EBOT must ensure that appointments are made in compliance with the State Sector Act 1988 (including appointment on merit, equal employment opportunities and being a good employer) and the terms and conditions of appointments within the education collective agreements that are applicable to the proposed school.
- 46. The governance facilitator and New Zealand School Trustees Association (NZSTA) will be able to assist the EBOT in this matter.

<sup>\*</sup> Prior to the school opening, the establishment board can appoint a principal and senior teachers.

#### Consultation

- 47. Section 157 of the Act requires you to consult the Boards of Trustees of all state schools whose rolls might be affected before deciding whether to establish a new designated character school.
- 48. We have undertaken this consultation on your behalf, and consulted 18 primary, intermediate and secondary schools across the affected network. Five responses were received. One response supported the increase in parental choice which would result from this school's establishment, two noted concerns about the quality of learning at the charter school, and one had no comment. A further school asked specific questions about the proposed school, which we answered. No further feedback was received. A summary and copies of responses are provided in Annex 7.
- 49. We consulted with sector groups and Ngăti Whātua Orākei. NZEI did not support the application as it considered likely Māngere population growth would not support another school, and that it would prefer investment in Pacific education by better supporting Pacific medium education in existing schools.
- 50. Several of the responses noted the short consultation period.

### Applicant response

- 51. Feedback received during the Ministry's consultation has been shared with the applicant, and they have responded to it. Regarding the comments about quality of learning, the applicant pointed to the importance of whānau involvement and how it has helped their students' achievement. They also noted that no student has been suspended or stood down at their charter school since it opened in 2014.
- 52. Regarding NZEI's point about strengthening other Pacific medium options, the applicant noted that their focus is on more than Pacific language. The Academy weaves the requirements of the NZ curriculum with our Pasifika experiences, strengths and knowledge. A copy of their full response is included in Annex 7.

#### Applicant consultation

- The applicant held three public fono between November 2017 and March 2018, and distributed other communications to discuss the application to become a designated character school with its community. The application noted that "whanau and Trustees unanimously agreed ... apply for a Designated Character status". Whānau also requested that the Board of Trustees negotiate current student: teacher ratios and class sizes, whānau mentoring programmes, improved property provision, integration of Pacific cultural values, and meet with local MP and Local [Community] Board Chair.
- 54. In support of its application, the applicant has provided letters of support from its community. These letters are from current students and parents, the previous governance facilitator and groups working with the school. They are included in Annex 7 for your reference.

#### Ministry response

55. Regarding the concerns raised about quality of learning, we advise that the school undertakes a curriculum mapping exercise across its curriculum topic overviews to clarify that all students have the opportunity to learn, achieve and progress in the breadth and depth of the national curriculum. We will use ERO's readiness review to provide assurance that any areas of concern have been addressed.

56. We note that in terms of population growth, the Council has identified South Auckland as an area for significant growth. This means that should the school be approved, any impact on the roll of other schools, including schools that have Samoan and Tongan language provision, will be off-set by population growth.

## Risks and Mitigations

57. In analysing the application the following risks, and their mitigations, have been identified:

a

## S9(2)(j) OIA

b.

- c. Should you decide to defer a decision until it is clear where the school will be located for 2019, it may be too late to appoint the EBOT and for them to appoint staff for the start of the year and would create uncertainty for families and students who are looking to enrol at the proposed new school. The proposed school does not have to open at the beginning of 2019 it could open any time in 2019. The Ministry would support students from the charter school to transition to other state schools in the local network.
- If you agree to defer a decision we will provide you with an updated report that includes whether suitable accommodation is available

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and next steps by 1 August.

e.

If the proposal is declined

S9(2)(j) OIA

S9(2)(j) OIA

f. If you decide to decline the application we will support students to enrol at local state schools. We will also work with the schools that receive the students to support a smooth transition for them.

## **Next Steps**

58. We recommend you defer making a decision until the Ministry provides you with more certainty about the property situation for the proposed school.

59.

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- 60. Should the property issues be remedied we consider that the requirements of the legislation have been met and you could consider approving the proposal from Rise UP Academy be established as a designated character school under sections 146, 156 and 156AA of the Education Act 1989.
- 61. Alternatively you could decide to decline these applications. If this is your decision the Ministry will:
  - a. work with the sponsor to manage the wrap up of the charter schools;
  - support families / students to enrol in other schools and to transition to their next school;
  - c. work with the schools who receive students from the charter schools so that they are well placed to respond to their needs.

## Proactive Release of this Report

62. It is intended that this Education Report be proactively released once final decisions have been made on all applications from the sponsors of charter schools. Any information that might need to be withheld will be done so in line with the provisions of the Official Information Act 1982.

### Annexes

- Annex 1A: Letters to Applicant and Local MPs (defer)
- Annex 1B: Letters to Applicant and Local MPs (decline)
- Annex 2: Ministry's Assessment of the Application
- Annex 3 Maps
- Annex 4: Copy of the Application
- Annex 5: Consultation Feedback
- Annex 6: Correspondence with Applicant