

Pupil Access and School Sufficiency:

Special Educational Needs and Disability Sufficiency Plan 2021 - 2024



Contents

		Page
1.	Introduction	3
	1.1 LA Sufficiency Plan	3
2.	The Tower Hamlets SEND Context	4
	2.1 Borough Population Data	4
	2.2 SEND Historical and Projected Population Growth	4
	2.3 Where Tower Hamlets Pupils with EHC Plans are Educated	5
3.	Child and Family View	6
	5.1 SEND Tribunals	6
	5.2 SENDIASS	6
4.	Tower Hamlets SEND Provision Context	7
	4.1 SEN Provision Continuum	7
	4.2 Early Intervention - Resource and Satellite Provision	7
	4.3 Specialist Provision – Cognition and Learning	8
	4.4 Specialist Provision – Communication and Interaction needs / Autistic Spectrum Conditions	9
	4.5 Specialist Provision - Social, Emotional and Mental Health Needs	10
	4.6 Specialist Provision - Early Years	11
	4.7 Specialist Provision – Post 16	12
5.	SEND Travel	14
	5.1 Policy	14
	5.2 Analysis	14

1. Introduction

Key to our ability to meet the needs of all children and young people with SEND is ensuring that we provide and plan for future provision that will meet our local needs. Demand and resourcing pressures mean that the existing approach to specialist Special Educational Needs (SEN) educational placements is not financially sustainable in the long term. The key challenge for the Local Authority (LA) and stakeholders will be maintaining the positive outcomes for pupils whilst reviewing the funding levels in order to meet demand within the available budget. The LA strategy comprises of six key areas:

- 1. Build upon the already successful model of inclusion by expanding and developing the capacity of mainstream schools to meet the needs of more complex learners;
- 2. Create the necessary capacity in the system at already high quality, well-established and 'outstanding' specialist provision. Ensuring the LA is able meet current and future demand and enabling SEND children to attend the most suitable local school.
- 3. Reduce the reliance on out of borough special school places and schools in the independent sector, through an increase in local resource provision in mainstream, particularly for children with ASD and SEMH;
- 4. Redesign the specialist system for children and young people with SEMH to ensure integration pathways for those learners who are able to be supported back into mainstream settings and ensure high quality learning and support for those whose needs require ongoing specialist support;
- 5. Extend the offer and range of Post 16 provision, to enable more young people with SEND to achieve Preparation for Adulthood outcomes: employment; independent living; health and community participation;
- 6. Promote independence by providing independent travel training and personal travel budgets for eligible children and young people and their families.

1.1 LA Sufficiency Plan

High quality cost-effective provision is central to meeting the LA's aim for a flexible and responsive SEND system that strives for continuous improvement, with the objective of ensuring inclusion and high standards of achievement. Tower Hamlets is clear about what that provision is intended to achieve for children with SEN:

- for every one of Tower Hamlets' children and young people with special educational needs and disabilities (SEND) to lead a fulfilling life, to be as independent as possible, and supported to learn, thrive and achieve by their families, services and local communities.
- ensuring all children, young people and families are supported to access the right provision and support at the right time.
- maintaining a continuum of education provision and ensuring every school in the borough can play its part in supporting children and young people with special needs and disabilities.
- consistent and sustained focus on achieving better outcomes for children and young people.
- effective and mature partnership working at both a strategic level and at the level of individual support.
- Joint commissioning of provision across education, health and social care to provide all-inclusive support and the best outcomes for children and young people.

This sufficiency plan covers:

- current position of the following provision:
 - borough commissioned special units attached to mainstream schools, known as Resource Provisions
 - maintained special schools, including Post-16
 - non-maintained special schools and independent schools, including Post-16

- independent specialist colleges
- Alternative Provision;
- the sufficiency pressures currently within the Tower Hamlets system and associated factors;
- the resulting priorities for additional non-mainstream provision and supply of places.

2. The Tower Hamlets SEND Context

2.1 Borough Population Data

Fig 1 – Breakdown of SEN within the School Population

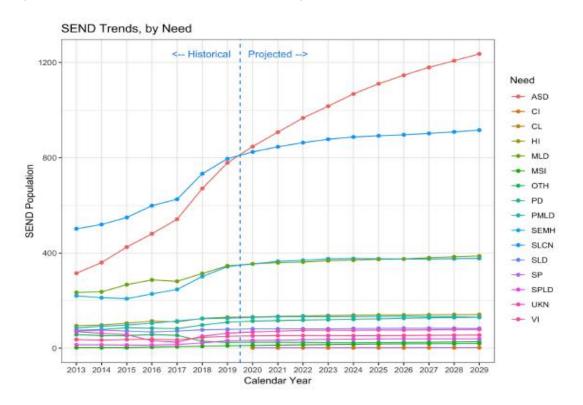
Area	Total Pupils – school population only	Pupils with EHCPs	%	Pupils with SEN support	%	Total pupils with SEND	%
England	8,911,887	325,618	3.7	1,083,083	12.2	1,408,701	15.9
London	1,453,264	55,856	3.8	165,782	11.4	221.368	15.2
Tower Hamlets	48,673	2,531	5.2	5.598	11.6	8,129	16.7

The percentage of Tower Hamlets pupils with EHCPs is significantly above the National and London average as is the percentage pupils requiring SEN Support.

The Tower Hamlets 0-25 population is forecasted to grow by 3.75% bringing the total to 103,900 by 2026. It is therefore reasonable to assume that the number of SEND learners requiring specialist provision will also rise proportionately. The future place planning for children and young people with SEND takes account of this predicted population growth as well as seeking to address current gaps.

2.2 SEND Historical and Projected Population Growth

Fig 1 – The historical and projected SEND population growth by need in Tower Hamlets:



The above shows the anticipated growth in the categories of need with a rise in pupils with Autistic Spectrum Disorder (ASD) being most prevalent over the coming years, in line with the national trend. To a lesser extent we expect to see a rise in pupils with Social Emotional and Mental Health Needs (SEMH), followed by those with Speech Language and Communication Needs (SLCN). The growth in these individual categories, together with the LA plans to ensure sufficiency of provision, is detailed below.

2.3 Where Tower Hamlets Pupils with EHC Plans are Educated

Fig 2. Numbers and Percentages of Pupils with EHCPs within each setting: Please note that these figures are from 2020 as the comparative data for 2021 is not yet available

	Tower F	lamlets	Lond	don	England		
	No.	%	No.	%	No.	%	
Independent School	91	3.8	3426	2.3	19011	3.3	
Non-Maintained Special School	N/A	N/A	274	98.2	3,686	97.3	
Pupil Referral Unit(s)	13	9.5	316	11.7	2,520	16.4	
State Funded Nursery	14	2.1	108	1.2	376	0.9	
State Funded Primary	925	3.6	17,410	2.4	83,438	1.8	
State Funded Secondary	712	3.8	11,589	2.1	60,229	1.8	
State Funded Special	682	99.4	17,687	95.4	125,498	97.9	
Total	2,437	5.1	50,810	3.5	294,758	3.3	

This tells us that:

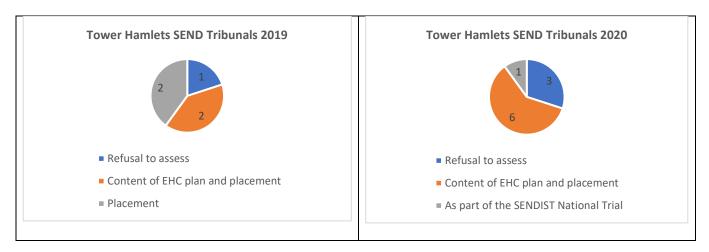
- Tower Hamlets has comparatively higher numbers of pupils with EHC plans in mainstream settings than national and London averages.
- Tower Hamlets has significantly less pupils with EHC plans in Pupil Referral Units comparative to national and London averages.
- Tower Hamlets has more pupils with EHC plans in state funded special schools than national and London averages.
- Tower Hamlets has significantly more pupils with EHC plans in state funded nursery schools than the national and London averages.

The historical and projected SEND population growth by need in Tower Hamlets is as follows:

3. The Child and Family View

3.1. SEND Tribunals

Tower Hamlets LA's core principle is to, as far as possible, provide access to mainstream education for all pupils with SEND. There is still a significant demand for placement in specialist provision from parents and, in most cases, this would involve a request for a child to be placed in specialist provision once the EHCP is issued. However, the numbers of tribunals lodged by parents remain quite low.



The new national SENDIST trial provides families with an initial single point of redress if they are unhappy with the educational, health and social care parts of their EHCP. There is currently one such case within Tower Hamlets.

3.2. SENDIASS

Through the work of SENDIASS case workers and feedback from the Parent Ambassadors the child and family view emphasise the need for more inclusion and inclusive practice in some mainstream schools.

Parents have expressed concern for the need to increase provision for ASD and particularly for more resource provision for their children who struggle in mainstream settings, but do not need specialist provision. As numbers of children diagnosed with ASD continue to rise annually it will become increasingly important for the LA to ensure there is more inclusive provision and consistent practice in its mainstream school sector, building on the high rates of mainstream inclusion that already exists.

Parental feedback has frequently identified a need for the LA to increase its SEMH provision for girls - particularly in the Secondary sector, and where the need is moderate e.g. social anxiety etc. Again, there is emphasis on the need for resource bases with the relevant specialist training and skills.

Parents would like to see a broader range of options for their children at Post 16, alongside the improvements in ASD provision and increased opportunities for supported internships and work based training. The borough recognises that more work is still needed to increase the range of options for SEND children at Post 16.

These views have been listened to and are being addressed through the SEND strategy and this SEND Sufficiency Plan.

4. Tower Hamlets SEND Provision Context - Needs Analysis

4.1 SEN Provision Continuum

This graphic shows the continuum of SEN provision within different types of establishment.



4.2 Early Intervention – Resource and Satellite Provision

4.2.1 Current Position

Resource Provisions are specialist education units attached to individual mainstream schools. Children attend on a permanent basis where they are on the roll of the school where the Resource Provision is situated. Satellite Provision provides children in special schools with access to a mainstream program, based on their ability to learn, communicate and socialise within a mainstream school environment. Resources Provisions and Satellite Provisions are a key component of the Tower Hamlets Local Offer and of mainstream inclusion.

4.2.2 Resource Provisions and Satellite Provision Needs Analysis

Existing Resource and Satellite Provision in Tower Hamlets

Primary

School Name	Туре	LA School or MAT	Funded Places	Needs
Cyril Jackson	Resource	MAT	20	SCLN
Globe	Resource	LA	30	SCLN
Total SCLN			50	
Culloden	Resource	MAT	30	Hearing Impaired
Hague	Resource	LA	16	Hearing Impaired
Total HI			46	
Bangabandhu	Resource	LA	15	Complex Needs
Total CN			15	
Phoenix Satellite at Marner School	Satellite	LA	20	ASD
Total Primary Resource Places			131	

Secondary

School Name	Туре	LA School or MAT	Funded Places	Needs
George Green's	Resource	LA	15	Complex Needs
St Paul's Way Trust	Resource	MAT	24	Hearing Impaired
Phoenix Satellite at Bow School	Satellite	LA	30	ASD
Total Secondary Resource Places			69	

The LA has reviewed the current resource provisions to inform its future commissioning intentions for this provision, ensuring it is relevant to and meets the needs of children and young people in the borough. In doing so, and recognising the increase in demand for SEND provision overall, we identified gaps in specialist resource places for children with needs in the particular SEN categories of ASD and SEMH. We have therefore established two new resource provisions within mainstream primary schools to be opened in the 2021/22 school year as follows:

School Name	Туре	Type LA School or MAT Funded Places		Needs
Hermitage	Resource	LA	12	ASD
Ben Jonson /Bowden House	Resource	LA	24	SEMH

These two new resource provisions will also provide outreach support to other primary mainstream schools to develop the borough's inclusive practice in relation to ASD and SEMH as well as increase early access to specialist SEMH provision for girls.

Alongside the development of resource provision in the primary sector the LA is also developing its plans to establish two new resource provisions for specialist ASD and SEMH in two secondary mainstream schools from as early as the 2022/23 school year.

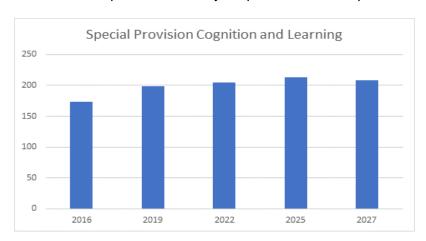
4.3 Specialist provision – Cognition and Learning

4.3.1 Current Provision

Tower Hamlets has two state funded special schools with approximately 240 places to cater for children with complex learning needs. Broadly these schools are for children with learning difficulties (moderate to severe or Profound and Multiple Learning Disabilities (PMLD) with associated, additional complex special educational needs (for example, speech, language, communication difficulties, autistic spectrum disorders, neurodevelopmental disorders, global delay). Stephen Hawking Special School caters for children aged 2 to 11 and Beatrice Tate Special School for children and young adults aged 11 to 19. Both schools are rated by Ofsted as being 'Outstanding'.

4.3.2 Needs Analysis

Over the past five years Tower Hamlets has seen a gradual increase in demand for places for children with cognition and learning needs. In 2016, 173 children attended Stephen Hawking and Beatrice Tate Special Schools. In January 2021, 199 children attended these schools, a 13% increase of 26 places over a 5 year period. This is expected to reach 210 by 2027.



To respond to this rising demand Stephen Hawking School has already been expanded from 100 to 130 places and Beatrice Tate School is undergoing a phased expansion from 75 to up to 130 places and this is scheduled for completion by insert date

This will create the necessary capacity in the system at already high quality, well-established and 'outstanding' specialist provision. Ensuring the LA is able meet current and future demand and enabling SEND children to attend the most suitable local school.

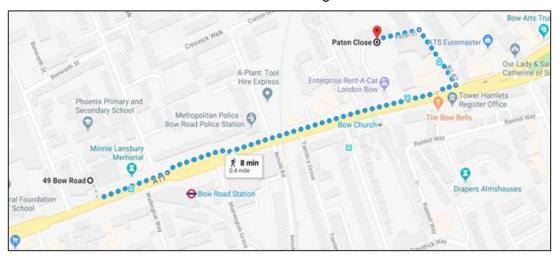
4.4 Specialist Provision – Communication and Interaction needs/Autistic Spectrum Conditions (CI/ASC)

4.4.1 Current Provision

Alongside the Resource and Satellite provision described above Tower Hamlets has one maintained (state funded) special school for children with Communication and Interaction needs/Autistic Spectrum Conditions (CI/ASC), Phoenix School. This School, rated by Ofsted as 'Outstanding', is in the early stages of a growth plan with an initial expansion of its capacity to 470 places for pupils aged 3 to 19 by September 2021. The School operates on two sites, comprised as follows:

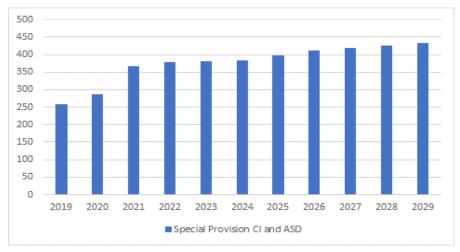
- Phoenix Lower School at Bow Road with capacity up to 230 pupils aged 3-12
- Phoenix Upper School at Paton Close with capacity up to 190 pupils 13 19
- A further 50 places are provided in satellite classes within local secondary schools

The new Paton Close site is very close to the existing Phoenix School (less than 600 metres), see map below. This enables a high level of integration between the two sites allowing Phoenix to operate as one school with staff working between both sites and other resources and activities shared to ensure its smooth running.



4.4.2 Needs Analysis

Over the past five years, the demand of places for pupils with Communication and Interaction needs has risen by 160. This has placed significant pressure on Phoenix School, which is already at full capacity following its initial expansion. This growing demand has meant that, at times, the school has needed to operate a waiting list for admissions. If current trends continue, Tower Hamlets is projected to require an additional 90 specialist places by 2027, with the number of pupils with Communication and Interaction needs growing faster than any other need type.



The plans to meet future growth in specialist CI/ASC provision will see a further phased expansion of Phoenix, alongside the development of resource provision in mainstream schools. This mixed economy approach will enable to the LA to effectively manage demand and reduce the current reliance on placements in Special Schools.

4.5 Specialist Provision - Social, Emotional and Mental Health Needs (SEMH)

4.5.1 Current Provision

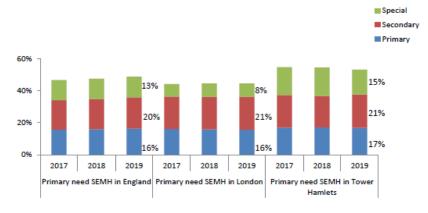
The provision landscape for children with SEMH is quite complex, reflecting the breadth of profiles of children who cannot be educated in typical mainstream school settings. The needs of the borough's SEMH children are therefore currently met across a range of borough provisions as follows:

Provision	SEMH Profile of Need	LA School or MAT	Funded Places			
Ben Jonson/ Bowden House Resource Provision	For pupils with emerging and/or acute SEMH difficulties who would benefit from early intensive intervention to address that need. Children would not always require an EHC plan and would be able to reintegrate to mainstream school within 2-4 terms.	LA	24			
lan Mikardo (Day) SEMH School	For pupils with significant and pervasive SEMH needs with behavioural challenge arising from neurodevelopment difficulties	MAT	48			
Bowden House (Residential) SEMH School	residential) residential 24 hour curriculum					
London East Alternative Provision (Short term)	Providing for pupils who due to illness, exclusion or other causes, would not receive a suitable, full time education. Pupils would be able to reintegrate to mainstream school or, following EHC assessment, transition into specialist SEMH or long-term alternative provision within 2-4 terms.	LA	N/A			
London East Alternative Provision (Long term)	Pupils in late KS3 or KS4 whose additional or special educational needs are not significant enough to warrant placement into specialist SEMH schools or, due to late emerging difficulties, are unlikely to engage with the structures and approaches of a specialist SEMH setting. This provision will have a heavy emphasis on personal and social development, small group teaching, vocational learning opportunities to facilitate successful post 16 transition.	LA	12			

4.5.2 Needs Analysis

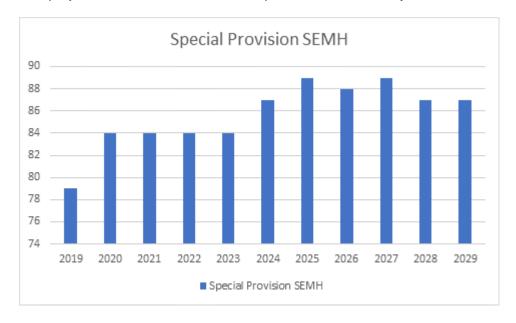
SEMH accounts for the second largest proportion of primary need for pupils with SEN in primary school in both Tower Hamlets and London and the second highest proportion of need in secondary school in Tower Hamlets (it is the highest proportion of need for secondary schools in London). A similar proportion of children with SEN in Tower Hamlets have SEMH as their primary need in primary and secondary school as in London and England, but there is twice the proportion of children with SEMH needs in special schools in Tower Hamlets than in London

In recent years the proportion of pupils with SEMH has remained broadly stable in primary and secondary school (it has fallen by 2% in special schools) but, in line with the population change, the number of SEN children with EHCPs for SEMH has increased by 100 over this period.



The higher proportions of SEMH need in secondary school is in line with national data indicative of development of SEMH at older ages

The projections of demand for SEMH provision remain fairly stable over the next ten years



Based on the current picture and identified future need, the LA will, over the course, of the 2021/22 school year:

- Review the SEMH provision in mainstream schools through a process of mapping interventions and support available in all schools;
- Increase the training resource for mainstream schools by applying for associate status in the DfE Behaviour Hub programme (LBTH does not qualify for full membership as it has only one school in RI for Behaviour and Welfare);
- Review current AP provision to determine whether a dual registration for AP/Special School status and accompanying funding review would meet the needs of secondary age pupils whose SEMH needs are only identified once they enter Alternative Provision;
- Conduct a full analysis exclusion patterns to determine whether there is a need for a therapeutic assessment centre for primary aged pupils which would provide early identification and intervention.

4.6 Specialist Provision - Early Years

4.6.1 Current Position

Although Tower Hamlets has significantly more pupils with EHC plans in state funded nursery schools than the national and London averages, numbers remain low in comparison to the mainstream populations. In January 2020 there were 14 children in state funded nursery schools with EHCPs.



Page 11 of 15

There is currently specialist early years provision for sensory impairment at Children's House Nursery as well as early years provision for children EHCPs in Phoenix (ASD) and Stephen Hawking (CL) Special Schools.

The figures above are specialist Early Years Settings and do not include children with EHCPs in mainstream schools with nursery classes or PVI settings. The figures for those in mainstream settings are included within the main figures above.

Targeted provision for sensory impairment? is also provided in Children and Family centres.

Invitation to Play

Mini cluster based targeted play sessions offering a nurturing play environment for children with special needs or awaiting diagnosis from specialist teams. Through Invitation to Play, families are supported to access other services and play sessions. Particular attention is given to help children learn the skills that will make them 'school ready' and support is given to parents who want to apply for 'Early Learning for Two Year Olds' funded places. The majority of the children attending will have been identified over concerns with the development of their social communication skills.

DOVES (Development Opportunities, Visual Experiences and Support)

Led by the Sensory Team, play session with EY's focused activities for children who are visually impaired. Parents and Carers are supported to guide their child's early learning through play and promotion of visual/tactile skills develop social and independent skills. Provides play ideas, information about eye conditions and effects and organises visits by other professionals such as mobility specialists.

Ready Steady Go

Ready Steady Go is a parent support group for parents of pre-school deaf and partially hearing children. Session is run using a 'Total Communication Approach' where a range of communication methods are used to encourage deaf and partially hearing children to understand and communicate effectively with others.

4.6.2 Needs Analysis

The number of children with EHCPs in early years provision is not expected to increase over the next few years, but the need for enhanced assessment at early years has been established and the LA will be looking to increase its capacity for early identification and assessment, so that individual differentiated plans can be developed to enable children to access to a mainstream school curriculum.

There are two programmes currently under development based on the feedback from families attending children and family centre sessions.

- Through the universal stay and play sessions, children identified as having communication and language delays or hearing impairment are invited to a sign along session tailored sensory sessions, story and rhyme virtual sessions.
- Children Therapist and Children & Family Centre staff co-delivered session to support children and parents with social communication concerns, to be offered on a locality basis. Parents given strategies to support their child's development by a range of professionals.

4.7 Specialist Provision – Post 16

4.7.1 The Current Position

Post-16 places for young people with EHC plans covers a broad range of provision across a number of education sectors including: sixth forms (mainstream and special both in the state funded and independent sector); sixth form colleges; colleges of further education; independent specialist colleges; work-based learning providers delivering apprenticeship, traineeship or supported internships. Young people may also work full or part time and study part time alongside their employment.

The table below shows where post 16 provision in receipt of LA high needs block funding is currently being provided:

School Name	Туре	LA School	Funded	Needs
		or MAT	Places	
New City College	Post 16 College	N/A	620	All SEND
	Independent	Charitable		
Phoenix College	Specialist College	Trust	30	ASD
London East Alternative				
Provision Post 16	Alternative Provider	LA	25	SEMH

4.7.2 Needs Analysis

Whilst current capacity shows that there is sufficiency of post 16 provision for young people with SEND, meaning less reliance on independent or non-maintained sector provision, our analysis tells us that there is a need to extend the range and nature of provision on offer. This will ensure that it is effective in enabling young people with SEND to achieve 'Preparation for Adulthood' outcomes: employment; independent living; health and community participation.

The SEND sufficiency plan will therefore focus on broadening the range of post-16 work and education opportunities for those with SEND, whilst continuing to support those that can access Higher Education to have the opportunity to do so.

This work is already progressing in the following areas:

- The LA and the newly established Phoenix College has set up the Queen Mary University based supported internship programme. This is the first Project Search DFN supported internship to be delivered at a university in London, helping young people with learning disabilities and autism to receive high quality work-related learning and improved opportunities to access long-term paid employment. The programme started with six interns, all of whom have subsequently secured sustainable jobs.
- The LA has established a second Project Search DFN supported internship programme with Marriott hotels. The start of this project has been delayed due to the pandemic, but will offer six interns pathways to employment in the hospitality sector.
- The opportunities on the LA commissioned supported internship programme at Tower Project Job Enterprise and Training Service have increased significantly over the past 3 years. This programme ensures young people acquire the skills, qualities, attributes and experience required to enter into the world of work in the hospitality and leisure sector.
- The LA has developed an aspirations event programme for young people with physical disabilities to explore possible careers in law. This is held at Clifford Chance (Canary Wharf) on a yearly basis.
- In response to the identified to increase sub level 2 vocational learning pathways, which will lead to apprenticeships and/or employment, the LA is working with two work-related learning providers (OneLab and ELATT) to develop a programme for apprenticeships in Art and Design. This programme is scheduled to begin in September 2021. The LA is also working with the Mulberry Schools Academy Trust to develop an entry level Catering and Hospitality programme for young people with SEND. This is will begin in September 2022 and will provide a pathway to the Marriot Hotels supported internships for up to 10 young people.

SEND Travel

5.1 Policy

The 'All Age Travel Assistance Policy' sets out the Council's approach to providing eligible children, young people and adults travel assistance in Tower Hamlets. The policy promotes choice, control, and where possible, a move towards greater independence. The forms of travel assistance that will be offered, once assessed against specified criteria:

- Home to school travel (5-16 years)
- Post 16 home to educational/training (16-25 with EHCP)
- · Children in the care of the Tower Hamlets Council
- Adults home to education/training or day care support services (18 years +)

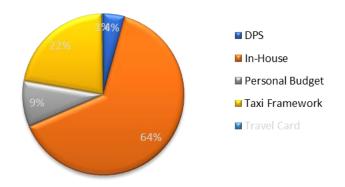
The aspiration is to support children, young people and adults to develop a range of skills and build confidence to travel either supported or unsupported to school, college, training, day services, or work placements in the wider community.

Where possible the Council expects parents/carers of children to make arrangements for their child to attend school in the same way as for parents/carers of children without a EHC Plan or disabilities as this is an important factor and benefit in developing the child's or young person's independence, social and life skills. Should a child meet the eligibility criteria for travel assistance the Council will decide on the type of assistance that will be provided following an assessment based on the child's particular needs.

5.2 Analysis

There are currently 890 pupils being transported each day to schools in and out of the borough at a cost of £5m annually. Of these, 86% of students are transported to schools within the borough. 14% are transported to schools within other London Boroughs.

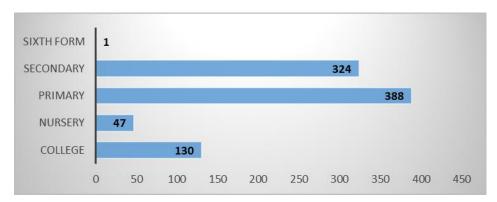
Types of Travel Assistance	Number of students
In-house Transport (Council School Buses)	566
Taxis (Dynamic Purchasing System)	239
Personal Transport Budget	82
Travel Cards	3
TOTAL	890



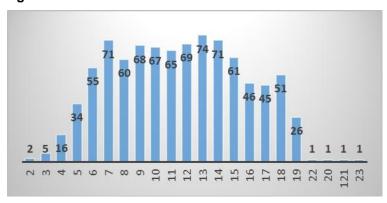
Transport by Provision Type



Phase of Education



Age Profile



Personal Transport Budgets

The Personal Transport Budget scheme was launched at the start of the 2019/2020 school year and has since proved to be very popular with parents as it offers flexibility and opens up options for families to find workable solutions to getting their child/children to school. It is anticipated that take-up will be up to 150 families by the end of the current financial year.

Independent Travel Training

The Council also offers Independent Travel Training. The training is on a 1:1 basis with an accredited Travel Trainer with practical training in road safety; personal safety; practice using public transport and learning alternative routes.

It costs on average £7000 per year to transport a student to and from school, so for every child trained that either no longer requires transport, or the need for transport is precluded in the first place, represents good value for money.

All Children's eligibility for travel assistance is reviewed periodically. Most reviews will take place on an annual basis, however the approach to continual assessment means that annual timeframes will not be an obstacle to providing the most appropriate form of travel assistance to children throughout the academic year.

2020/21 Transport Spend

Type of Travel Assistance	No. of YP	4		Q1	Q2	Q3	*	Q4		Total
Taxi Framework	195		£	114,296.00	£ 326,973.00	£ 642,376.00) 1	£ 430,772.00	£	1,514,417.00
DPS	38				£ 7,572.00	£ 64,898.00) f	£ 74,076.00	£	146,546.00
Travel Card	3		£	2,810.00					£	2,810.00
PTB	82		£	2,200.00	£ 108,864.00	£ 124,793.00) I	£ 600.00	£	236,457.00
Miscellaneous Costs							f	£ 315,470.00	£	315,470.00
									£	2,215,700.00