

Mapledurham Playing Fields Upper Woodcote Road, Caversham Reading

1. Introduction

- 1.1 Mapledurham Playing Fields (The Playing Fields) is a recreational park of about 11 hectares, located to the north of the Borough in Caversham, on the Upper Woodcote Road. The site is owned by the Mapledurham Recreation Ground Charity (Charity), the freehold of which is vested in the Official Custodian for Charities. The Playing Fields have been in the trusteeship of Reading Borough Council since 1985.
- 1.2 The site is set out mainly as football pitches. There are four tennis courts, two of which are floodlit, and are leased and maintained by Mapledurham Lawn Tennis Club. There is a car park, accessed from the Upper Woodcote Road.



- 1.3 There is a pavilion, which serves as changing and social rooms for the tennis and football clubs, attached to a community hall. The hall is in poor condition, and is currently closed. In the past, it was available for hire by

clubs, children's and youth groups, other community groups, and private parties.

- 1.4 The site is the subject of a proposal with planning permission by the ESFA to build The Heights Primary School (The School) on an area of 1.231 acres to the north-west. This particular document does not cover the area set aside for the school, but is intended to make specific what is required in respect of recreational provision and landscaping to the rest of Mapledurham Playing Fields to mitigate the effects of locating a school on a well-used section of The Playing Fields. The plan also indicates zones for enhancement and improvement, with detail to be identified as detailed plans and specifications are produced.
- 1.5 This document has been prepared for the members of the Mapledurham Playing Fields Trustees Sub-Committee. The Sub-Committee has delegated authority to take decisions as Trustee in relation to the Charity.

2.0 Background and Need

- 2.1 The Education and Skills Funding Agency (ESFA) has sought planning approval from the Local Planning Authority, subject to legal agreements, for The School to be built on 1.231 acres of Playing Fields Plan 1 ESFA Mitigation Plan (appended to the end of this plan). The School includes a 188m² school hall and 22mx33m Multi-Use Games Area which will be made available for community use outside school hours.

Mitigation

- 2.2 The School will impact upon the visual amenity and introduce a number of pressures onto the Playing Fields. This includes both increased use and changing patterns of activity, access and demands. These will require mitigation but also provide the opportunity to increase the recreational use of the Playing Fields.

The mitigation to be undertaken is:

1. Provision of football pitches at least equivalent to the current provision in terms of capacity and quality.
2. New relocated play area (because the existing play area will need to be removed to allow re-provision of football pitches).
3. New tree planting (because some of the existing trees will need to be removed to allow re-provision of football pitches).
4. Car parking reconfiguration to accommodate both playing field and pavilion use (including tennis) with use of the school staff car park for public use out of school hours.
5. New pedestrian and cycle paths to accommodate the significant daily increase in people arriving at the site to access and leave the school. [egress is a noun not a verb!]

6. Lighting of car parking for the safe passage of children during winter school arrivals and departures.
7. Introduction of management regimes to ensure car parking is available for Playing Field and pavilion users.
8. Entrance improvements to accommodate the significant daily increase in people arriving at the site.
9. New bins and seating to replace those lost through reconfiguration of the Playing Fields.
10. Free access to the school Multi Use Games Area (MUGA) to offset loss of basketball court.

Enhancement and Improvement

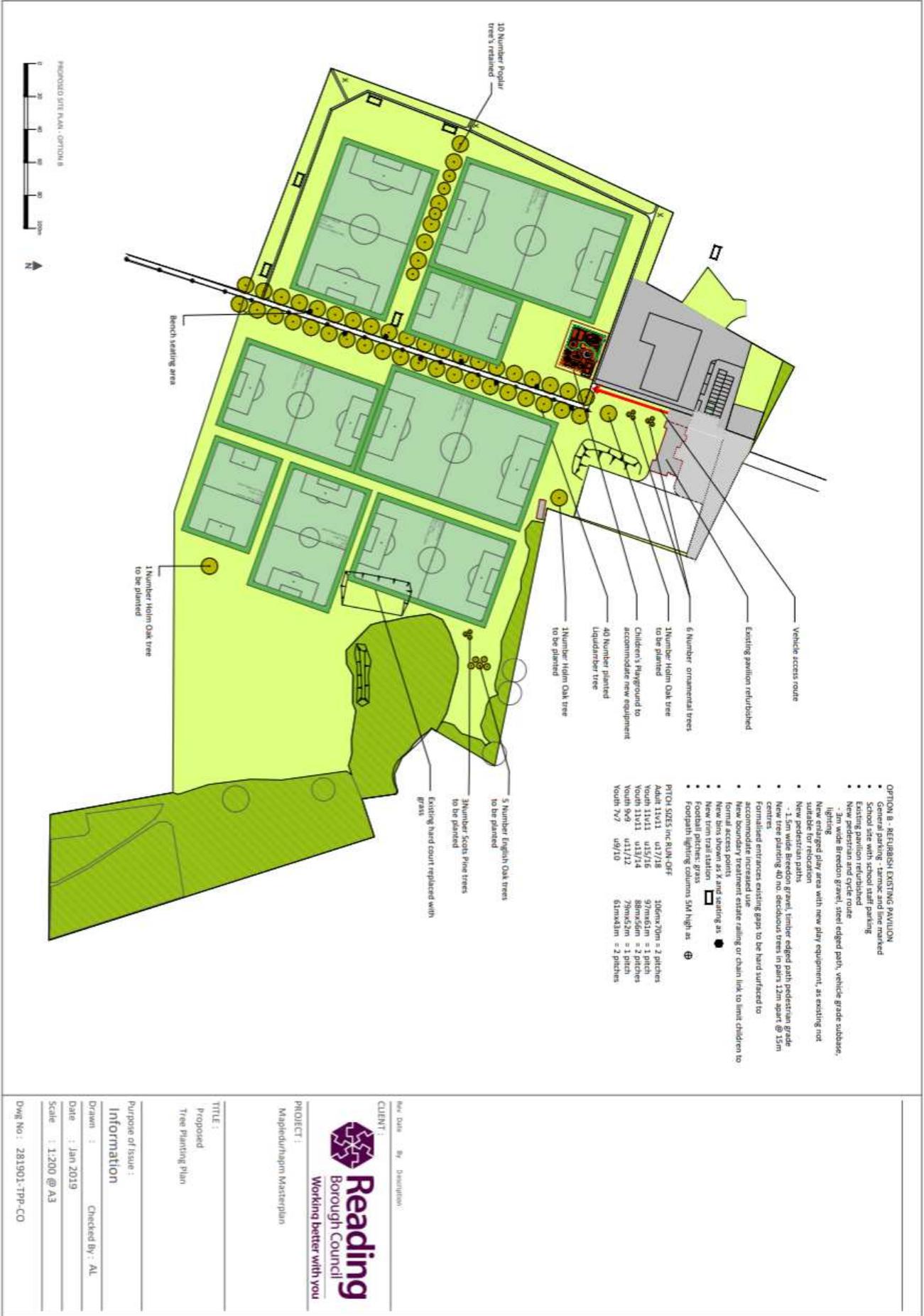
2.3 A public consultation was carried out in the summer of 2017 in respect of the ESFA proposal, and an alternative proposal, Fit4All, submitted by the Mapledurham Playing Fields Foundation (MPFF). The consultation sought the views of beneficiaries on the relative merits of the two proposals for the site in recreational terms. Respondents were also asked about what improvements/enhancements to amenity value they wanted to see at the Playing Fields. These are recorded in the table below, and provide a background to the proposals for enhancements set out in this document.

Items that should be either included or excluded from Proposal	Items that should be included in any improvements	Items that should be excluded from any improvements
Undertake options A-G (as per proposal in Consultation)	2439	
A. Pavilion upgrade	170	10
B. Footpath network	108	22
C. Entrance improvements	77	24
D. Small floodlit artificial turf pitch (ATP)	69	64
E. New furniture	79	16
F. Tree Planting	76	27
G. Grass football pitch improvements	73	27
H. Upgrade small floodlit ATP pitch to full size	125	138
I. Upgrade play area & move	256	69
J. Fitness Stations	136	117
K. Relocate Asphalt area	88	108
L. Boundary improvements	91	98
M. Maintenance sum	198	72
Swimming pool	10	
Lighting	10	
Café	10	
Cricket	10	
Tree planting	10	
Toilet	10	

- 2.4 In terms of what respondents want to see on the site, there is most support for items A to G as a package of works, as shown in the table: they were supported by 2,439 out of 3,313 responses received (74%).
- 2.5 When respondents have considered the individual elements of the proposal, the provision of a Floodlit Artificial turf pitch (items D & H) has received a neutral response.
- 2.6 There is clear support for moving and upgrading the play area and some support for including fitness stations on the site. There is greater ambiguity about other proposals.
- 2.7 The areas of enhancement and improvement include:
1. Rebuild or refurbishment of the Pavilion
 2. Improvement to further area of sports turf to allow greater flexibility in use.
 3. Expansion of the play area and improved access to it to accommodate greater number of users and a wider range of abilities.
 4. Expansion of car parking to accommodate greater use.
 5. A non intrusive new boundary treatment to include estate railings or chainlink along Hewett Avenue to limit the movement of children to formal access points.
 6. Fitness stations located adjacent to paths to form a fitness trail.
 7. A tree-lined footpath connection between Chazey Road entrance and the pavilion along with a boundary footpath connecting to the main path and running adjacent to Hewett Avenue.
 8. Additional furniture to support greater use.
 9. Funds reserved to support applications for funding to improve the Playing Fields further.
 10. A fund to support applications for grants to lever in further capital to make further improvements eg extended changing or artificial turf pitch. This would be typically used as contributory or match funding.
 11. Lighting along the main path running from Chazey Road entrance to the pavilion.
 12. Provide an increase in car parking.

3.0 Plan

The plan shows below illustrates the changes being made and layout of playing field



Rev. Date: By: Designation:
 CLIENT: **Reading Borough Council**
 Working Better with you

PROJECT: **Mapledurham Masterplan**

TITLE: **Proposed Tree Planting Plan**

Purpose of Issue: **Information**
 Drawn: **AL**
 Date: **Jan 2019**
 Scale: **1:200 @ A3**

Dwg No: **281901-TPP-CO**

4. Design Approach to Mitigation and Enhancement / Improvement

- 4.1 The location of the school will be adjacent to the car park and only 10m from the existing pavilion. It will separate visually the playing fields from the main vehicle and pedestrian access off the Upper Woodcote Road. The proposed school site also penetrates, albeit marginally, the main extent of the Playing Fields from Hewett Avenue on the west side to the sloped copse, orchard and woodland on the east side. If the Playing Fields are not to feel like left-over space, it is important to introduce a strong visual element that creates a spatial organising principle.

5. Timing of Works

- 5.1 Work will be undertaken prior to the school opening in September 2020 commencing in summer 2019 .
- 5.5 Pavilion works should be progressed as soon as permissions are obtained and procurement completed.

6. Pavilion

6.1 Enhancement

The existing pavilion will be refurbished, reconfiguring some of the storage/secondary meeting space to accommodate a larger kitchen and toilets. The existing two sports changing rooms would remain. A landscaped area at the end of an avenue running from Chazey Road entrance would be used to produce a focal point to the avenue rather than the edge of the pavilion. This is less expensive than option A, with funds being available to undertake other enhancements.

Additional changing rooms may be added subsequently as funding allows (contributory funding is available).

7. Access

- 7.1 There are the following barriers to access:

1. The main entrance off the Woodcote Road is difficult to find.
2. There is limited dedicated disabled parking.
3. There is no formal cycle parking.

4. Wheelchair access to the site is difficult (down a steep ramp alongside the steps, or across ground that gets waterlogged in winter).
 5. There is no handrail to the steps.
 6. There are no disabled toilet facilities.
- 7.2 Pedestrian access is achieved on three boundaries, along roads with side pavements of adequate width.
- 7.3 For people arriving by car, Mapledurham Playing Fields and the pavilion are accessed by a driveway off Upper Woodcote Road. There is parking for around 30 cars. This is sufficient for general use, but wholly inadequate for football use or for events. Event parking is available by allowing access on to the playing fields off Chazey Road, when ground conditions allow. The surface of the car park is gravel and road planings, which is difficult for those who are ambulant disabled to negotiate on foot.
- 7.4 In order to resolve the problems identified, the following changes will be made:
- 7.5 Mitigation
- 7.5.1 The car park will be surfaced, and four permanent disabled parking bays will be created in addition to those made available by the tennis club for disabled use during disabled tennis coaching sessions.
- 7.5.2 Directly opposite the driveway, on the southern boundary, is the primary pedestrian access off Chazey Road. The formalisation of a tree lined Breedon gravel path across the playing fields from the Upper Woodcote Road access to the Chazey Road access will improve the walking route across the site. This will create the main visual feature from which the built and recreational facilities are arranged. It is proposed that the path be 3m wide, to accommodate cyclists and pedestrians comfortably.
- 7.5.3 To protect the football pitches and provide dry walkways in wet weather, there should be a perimeter network of narrower breedon gravel surface paths (1.5m wide) to the west of the avenue, linking the entrances on Hewett Avenue with the main route across the park. The entrances on to Hewett Avenue should be hard surfaced for protection from erosion, and the boundary between them fenced with visually permeable fencing to confine children and dogs to formal gateways.
- 7.6 Enhancement
- 7.6.1 A new fully accessible toilet will be installed in the refurbished pavilion.
- 7.6.2 A 3m wide step free asphalt stone chip path with reinforced turf either side will connect the car park to the main path network. This will provide good pedestrian access and support vehicular access for events or emergency vehicles. Details of levels are still to be determined.

7.6.3 The footpath network will support greater use of the fields both during wet weather especially by pushchairs, wheelchairs and people requiring firm, smooth surfaces to walk.

7.6.4 Signage off the Upper Woodcote Road will indicate the entrance to the Playing Fields and the school.

8. Football Provision

8.1 In order to replace the lost football pitches, it will be necessary to remove the children’s playground, the basket-ball court and the trees in the centre of the site. With some levelling and drainage improvements, this will create sufficient space to provide the required number of grass pitches. This would also allow possible future development of an artificial turf pitch, subject to funding and planning approval.

8.2 The current need for football pitches is set out in the table below:

Pitch size including run-off	Weekly equivalents	Peak use	Pitches required		
			Good	Standard	Total
Adult U17/18 11v11 106mx70m	4.5	2	1	1	2
Youth U15/16 11v11 97mx61m		2		1	1
Youth U13/14 11v 11 88mx56m	3.5	4		2	2
Youth U11/U12 9v9 79mx52m	3	3		1	1
Mini Soccer U9/U10 7v7 61mv43m					2

8.3 In addition to the current demand identified above, it is anticipated at least one of the football clubs who have recently left will return when facilities are brought up to an adequate standard. The provision of pitches to be made will be as follows:

Pitch size including run off	Pitches provided		
	Good	Standard	Total
Adult U17/18 11v11 106mx70m	1	1	2
Youth U15/16 11v11 97mx61m		1	1
Youth U13/14 11v 11 -88mx56m	2		2
Youth U11/U12 9v9 79mx52m	1		1
Mini Soccer U9/U10 7v7 61mv43m	1	1	2

8.4 Mitigation

8.4.1 The area to the east of the main central path will be re-graded with improved drainage to provide a “good” quality sports turf catering for 1x adult, 2x under 13, 1x under 12 9v9 and 1x mini soccer. The improvements

to the second adult pitch will accommodate returning teams and represent an enhancement. Pitches on the western side of the playing fields will be dressed. This will provide significant flexibility in how pitches are configured, also allowing for a different mix of pitch sizes to be accommodated as club needs change. The layout also allows for pitches to be moved (rotated) meaning areas of high wear can be rested.

8.4.2 The grading of the sports turf areas will allow re-provision of existing pitches. The further improvements to the drainage of the area to the east of the axial path will accommodate their use by the existing adult teams.

8.5 Enhancement

The extension of the drained area over the full extent of the sports turf to the east of the path will allow intensified use, accommodating existing use and growth in the future. This will allow either expansion of football, laying out alternative sports pitches or use of space for alternative activity.

9. Basketball Court

9.1 As part of the School development a Multi-Use Games Area (MUGA) is being provided. This is of a higher standard than the existing basketball court and supports a variety of uses. The existing court is very poorly used not being served by paths or lit.

9.2 Mitigation

In order to provide maximum flexibility in the provision of pitches, the basketball court will be removed. The school MUGA will be made available with free access when not in use by the school.

9.3 Enhancement

The school MUGA will be fenced and of higher quality than the existing hard court. It will also be served by an access path.

10. Children's Play Provision

10.1 The existing play area is of poor quality, not served by footpaths and little used in comparison to most other Council playgrounds. The play area will be relocated closer to the pavilion, school and car parking improving accessibility and proximity to support infrastructure.

Given the envisaged very large increase in daily use by children, it will be enlarged to increase the capacity of the play area (both in terms of size and of the number and range of different types of equipment). The play area will consist of a low level fenced space for junior and toddler equipment with appropriate seating for parents.

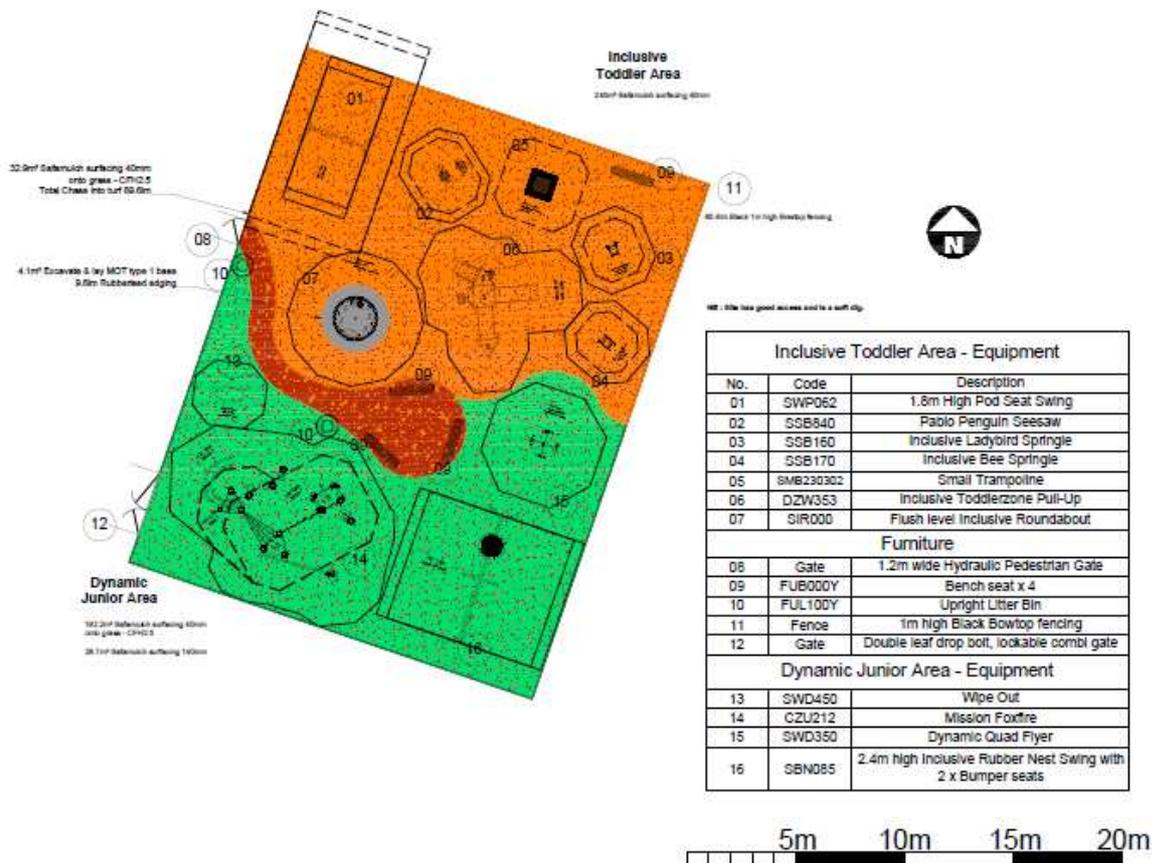
10.2 Mitigation

Re-provision of the play area of a similar size but to current safety standards.

10.3 Enhancement

Expansion of the play area to accommodate an increased range of equipment and making it fully inclusive. This will include non-loose fill safety surfacing, appropriate equipment and access path.

Plan of new play area



11. Car Parking

11.1 The car park has a number of limitations being made from a variety of surfaces that are difficult to maintain. It is inadequately marked out and unable to cope with peak use and it does not drain.

11.2 Mitigation

Tarmac surface of existing car park with lined parking bays and formalising the area to the north of the tennis courts and lighting parts of the most used sections.

Cycle stands to be provided for public use to encourage cycling.

- 11.3 Enhancement
Expansion of the car park into part of the area to the north of the school. This is now isolated from the rest of the Playing Fields and serves very little recreational purpose. It is likely to be poorly used and potentially abused. Use as a car park will clearly support use of the Playing Fields given the under supply of car parking.

12 Boundary Treatment and Entrances

- 12.1 There will be increased access from Hewett Avenue and Chazey Road.
- 12.2 Mitigation
Breedon gravel paths will be laid from the internal path network to join entrances from Chazey Road and Hewett Avenue.
- 12.3 Enhancement
Signage and formalising entrances into the Playing Fields will be undertaken. An estate rail fence will be introduced along Hewett Avenue to encourage people to use the formal entrances only. Vegetation management along Hewett Avenue will be undertaken.

13 Tree Planting

- 13.1 Fifteen trees will be lost as the sports turf area is extended across the Playing Fields with the trees around the play area removed.
- 13.2 Mitigation
An avenue of 40 liquidambar trees in pairs 12m apart (4.5m from the path edges on both sides) and at 15m centres along its length will be planted along the main central footpath to create an avenue running from Chazey Road to the pavilion.
- Five oaks will be planted to the north east of the of the basketball court
- Gaps along the boundaries will be planted with native trees.
- 13.3 Enhancement
Five evergreen specimen trees such as Scots Pine and Holm Oak will be planted in strategic positions to create points of interest.

14 Furniture

- 14.1 With increased use of the playing fields it is important to provide furniture to support use. This is particularly useful for those who are less fit or mobile. Introduction of new activities is likely to encourage a different group of people into using the Playing Fields.

14.2 Mitigation

Existing furniture around the Playing Fields lost through reconfiguration will be replaced.

14.3 Enhancement

- Additional furniture (six seats) to cater for increased use.
- A small outdoor fitness circuit following the boundary path will be installed. This will introduce a new activity likely to serve a different group of people to existing users.

15.0 Maintenance and Investment

15.1 A reserve of £100,000 will be retained from the capital sum to address significant maintenance items which, in the past, have been unable to be addressed such as a roof failure. General day-to-day maintenance will continue to be funded through general income to the Playing Fields or the Council as per current arrangements.

16.0 Summary of Items of Mitigation and Enhancement

The table below identifies elements of the landscape plan by item.

16.1 Mitigation funded and identified through Planning Agreement

Sports pitch (levelling/drainage/ground preparation)
Basketball court removal and reprovision (MUGA)
Play area removal and reprovision
Main central path
West side boundary path (Hewett Avenue)
Tree removal and planting - avenue
Furniture removal and replacement
Entrance improvement Signage

16.2 Core enhancements to be undertaken

Item
B - Refurbish whole existing pavilion 375m2
Sports pitch (levelling/drainage/ground preparation)
Play area extension

Boundary fencing (Hewett Avenue)
Trim trail
New Furniture (6 items)
Specimen trees x5
Entrance improvement Signage
Surveys and fees (planning, archaeology etc)
Landscape to area around pavilion
Main central path lighting
16.4b Small grasscrete overflow car park 12 spaces
Maintenance
Total

Unspent funding will be allocated to other schemes such as match funding for lottery grants by the Trust.

17 AMENITY VALUE

17.1 The loss of the 1.231 acres of land for the school and segregation of a small piece of land to the north of the school does have a negative impact on the Charity's ability to provide recreational opportunities for its beneficiaries at the Playing Fields. Similarly the increased numbers of people using some of the support facilities when accessing the school may have a negative impact on some recreational users of the Playing Fields. These impacts include:

- Reduction in area available for car parking during fetes or other occasional large events.
- Likely small reduction in car parking availability for Playing Field users early weekday evenings.
- Loss of visual amenity attributable to a large building within the existing curtilage of the Playing Fields.
- Congestion at the main entrance to the Playing Fields at school pickup and drop off.

17.2 There are also a number of potential negative impacts from The School's activities and visitors/users to the school:

- Over use of sports facilities for curricular activity.
- Over use of sports facilities through after school activity (formal and informal).
- Damage to grounds through the establishment of through-routes across the field.

- 17.3 However, receipt of the sum of £1.36m from the ESFA will also enable the Charity to improve its facilities for the benefit of its beneficiaries. The daily visitors to the school will also increase the profile of the Playing Fields and encourage its use.
- 17.4 A series of mitigations and enhancements have been identified to ensure the Playing Fields can better serve the Charity's beneficiaries, albeit with some change to the character of the Playing Fields.
- 17.5 Mapledurham Playing Fields, as with parks in general, will provide recreational activities and facilities to a broader range of people than any other type of leisure facility. This plan has considered these in a broad range of categories.

Sport

17.6 Football

The Playing fields currently provide:

- 1 x senior football pitches
- 2 x undersize senior pitches
- 1 x junior 11-a-side pitch
- 2 x 9-a-side pitches.
- 3 mini soccer areas matches until October training thereafter.
- (All standard quality at best)

This will accommodate the following games per week

- 6 x senior games (or substituted junior games)
- 3 x junior 11-a-side
- 4 x 9-a-side
- Multiple training sessions on mini soccer areas and across pitches

The proposed lay out provides

- 2 x senior football pitches (full FA size) (Quality 1xgood 1x standard)
- 3 x junior 11 aside (2x good quality, 1 x standard)
- 1 x 9-a-side (good quality)
- 2 x seven a side (1x good and 1x standard quality)
- Space to provide training areas or further 5v5, 7v7 or 9v9 pitch

Pitch size including run off	Pitches provided		
	Good	Standard	Total
Adult U17/18 11v11 106mx70m	1	1	2
Youth U15/16 11v11 97mx61m		1	1
Youth U13/14 11v 11 -88mx56m	2		2
Youth U11/U12 9v9 79mx52m	1		1

Mini Soccer U9/U10 7v7 61mv43m	1	1	2
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This will accommodate the anticipated demand for football games per week:

6 x senior games (or substituted junior games)

7 x junior 11-a-side

4 x 9-a-side

6 x 7 aside

Multiple training sessions on non-marked areas and across pitches or on additional pitch(s) if marked out.

There is clearly an increase in the capacity of the site to accommodate football and school use.

The provision of a second set of changing rooms would support use of a second adult pitch. This would provide a further increase in amenity.

17.7 Informal Sport

The improved sports turf areas will continue to support *informal games*. The increased awareness of the site and better access links is likely to increase this use.

The current tarmac area is of little use, of poor quality, unfenced and only has basketball hoops. There is no access path, discouraging use when ground conditions are damp. Free access to a high quality multi-use games area outside of school hours will clearly improve the usability of facilities.

The tennis courts/club will be unaffected in the long term.

It is anticipated that overall sports use will increase.

17.8 Community Events

Car parking on the field currently happens very occasionally during the year as the general management approach is to discourage this due to damage to the grounds. It will still be possible to marshall vehicles onto the field if ground conditions are good to provide overflow parking.

The changes to the landscape will have a limited impact on the ability to conduct events.

17.9 Walking and Dog Walking

The reduction in the area available for dog walking is limited. The provision of a circular path will provide a route for dog walkers in wet weather. A variety of landscape types, woodland, close mown grass, orchard and conservation grass are continued to be provided. The raised profile of the

site is likely to increase the number of people using the site for this purpose especially if dropping off and collecting children at the school

On balance the amenity for all walking will increase.

17.10 Children's Play

An increase in size of the playground with better links to entrances including via paths, will significantly better serve parents and children. The higher profile and immediate adjacent school will also increase use.

The proposal will significantly improve children's play provision and participation.

17.11 General Recreational Activity

The reduction in total area is unlikely to have a material impact on general recreation. The range of landscape types remains broadly unchanged affording the same variety of recreational activity from flying a kite to picnicking to simply sitting and whiling away a sunny afternoon.

The improvements in access arrangements and raised profile of the site will increase the levels of use of the park for general recreation.

17.12 Visual Amenity

The provision of sports facilities and organisation of activity will attract many users to participate in these events. The quality on a landscape in terms of visual amenity will significantly influence whether people choose to visit and make use of an open space particularly on a casual basis.

The development of the School will have a negative impact on the aesthetics as people come to use the Playing Fields from the Woodcote Road entrance. The School will also replace a green tree belt bordering the Playing Fields when viewed from within the park. In contrast the formalising and tidying of the car park will improve this entrance and the refurbishment, or rebuilding, of the pavilion will address some significant elements detracting from the visual amenity.

The loss of trees from within The Playing Fields will detract from the visual amenity and there will be a reduction in the variety of views although at times the very open nature of the Playing Fields and lack of cohesive structure of the landscape makes the area feel under-designed and uncared for.

The development of a large and visually strong liquidambar avenue will provide a significant and focal feature and additional area of interest. The medium term extension of the line of fastigate trees to replace the Lombardi Poplars and the avenue will significantly reduce the visual

dominance of the school by drawing the eye away and across the site. Similarly the planting of 5 specimen trees will add further areas of interest.

An assessment of impact on visual amenity is subjective and different people will have a different view. On balance it is believed there is a slight reduction in visual amenity initially, but as trees mature the impact will be neutral.

17.13 Fitness and Exercise

The installation of a circular route will promote use of the park by a wide variety of people who would otherwise not use the park, particularly benefitting the less mobile, elderly and those with pushchairs. The installation of fitness stations provides a new facility likely to serve a group of people who may not already be using the Playing Fields. Experience at other parks in Reading indicate that this feature is likely to be well used.

The paths will also support cycling for both commuting and a form of play for children.

The installation of paths and fitness stations will increase the amenity of the Playing Fields.

17.14 Conservation/Nature/Education

The loss of trees around the play area will have a negative impact upon biodiversity. The planting of 40 Liquidambar, 5 specimen trees and 5 oaks will provide more trees than lost, however, the use of ornamental trees will support a narrower group of animals and invertebrates than native trees. The purpose of the avenue is to compensate for the loss of amenity from the tree loss rather than habitat. They also need to not impact upon sports pitches, limiting the choices available. A range of habitats e.g. woodland, woodland edge, conservation grass, orchard, are retained.

The opportunity for people to support the management of the green infrastructure will be unchanged. With the increased use and presence of the school, it is likely the Playing Fields will be increasingly used to educate young people in ecology.

The planting of the specimen trees and group of oaks in addition to the avenue will compensate for the loss of habitat from the loss of trees around the play area.

17.15 Accessibility

The improved entrances, footpaths and lighting will significantly improve accessibility for key groups. This is further improved by the installation of benches at key points for people to rest should they wish. This is particularly important to those who are less fit. The installation of circular

routes has been seen to increase use as part of a package of improvements at both Cintra and Kensington Road Parks.

There will be significant improvements in accessibility.

Lighting if installed would provide a feeling of safety to encourage people to walk through the Playing Fields into the evening further increasing the amenity value.

17.16 Summary

As with most changes there will be a number of impacts with varying degrees of benefit or negative impact across a variety of areas. From the assessment above there is a clear net improvement in the overall amenity value.

17.22 Equality Impact Assessment

An Equality Impact Assessment presented to the Trustee Sub-Committee on 9 January 2018 found that no group with protected characteristics under the Equality Act 2010 would be disadvantaged by the proposals, with improvements being made for many. The changes are neutral when considered by gender, religion, socio-economic group race or sexual orientation. There are significant improvements for young people, the less fit/healthy which are often related to old age and disability. Particular reference is made in para. 7 above to how mitigation and improvement works could ease barriers to access.

ESFA Mitigation Plan

