[NOT PROTECTIVELY MARKED]

CITY OF WOLVERHAMPTON C O U N C I L

Children, Young People and Families Scrutiny Panel

Monday, 3 February 2020

Dear Councillor

CHILDREN, YOUNG PEOPLE AND FAMILIES SCRUTINY PANEL - MONDAY, 3RD FEBRUARY, 2020

I am now able to enclose, for consideration at next Monday, 3rd February, 2020 meeting of the Children, Young People and Families Scrutiny Panel, the following reports that were unavailable when the agenda was printed.

Agenda No Item

3 <u>Towers Outdoor Education Centre - Options Appraisal (report to follow)</u> (Pages 3 - 16)

[Richard Welch, Head of Partnerships and Commercial Services (Education), to present report]

If you have any queries about this meeting, please contact the democratic support team:

Contact Earl Piggott-Smith 01902 551251

Email <u>earl.piggott-smith@wolverhampton.gov.uk</u>

Address Democratic Support, Civic Centre, 1st Floor, St Peter's Square,

Wolverhampton WV1 1RL

Encs



CITY OF WOLVERHAMPTON C O U N C I L

Children, Young People and Item No: 3 Families Scrutiny Panel

3 February 2020

Report title The Towers Outdoor Education Centre –

Options Appraisal

Cabinet member with lead

responsibility

Councillor Dr Mike Hardacre

Education

Wards affected All

Accountable director Emma Bennett

Originating service Partnerships and Commercial Services (Education)

Accountable employee(s) Richard Welch Head of Partnerships and Commercial

Services

Tel 01902 552162

Email richard.welch@wolverhampton.gov.uk

Report to be/has been

considered by

Cabinet 19 February 2020

Recommendation for action:

The Scrutiny Panel is recommended to:

Comment on the proposed options being considered for the future of the Towers Outdoor Education Centre.

Recommendations for noting:

The Scrutiny Panel is asked to note:

This item is being considered as pre-decision scrutiny and will therefore not be available to call-in once a decision is made by the Executive.

CITY OF WOLVERHAMPTON C O U N C I L

Cabinet

19 February 2020

Report title The Towers Outdoor Education Centre – Options

Appraisal

Decision designation

Cabinet member with lead

responsibility

Councillor Mike Hardacre (Education)

Key decision Yes

Wards affected

Accountable Director Emma Bennett

Originating service Partnerships and Commercial Services (Education)

Accountable employee Richard Welch Head of Partnerships and Commercial

Services (Education)

Tel 01902 552162

Email Richard.welch@wolverhampton.gov.uk

Report to be/has been

considered by

Extraordinary Scrutiny

Meeting

3 February 2020

Recommendation for decision:

Cabinet is recommended to:

- 1. Approve the preferred option 1 as detailed within the options appraisal.
- 2. Support further work being undertaken with users of Towers to identify alternative options for outdoor education.
- 3. Under the #YES, engage with parents, young people and schools' longer term to ensure a range of activities and opportunities are accessible for all children and young people.

1.0 Purpose

1.1 To provide an options appraisal regarding the Towers Outdoor Education Centre in order that a decision can be made in relation to the future of the facility.

2.0 Background

- 2.1 The City of Wolverhampton Council (CWC) owns and operates The Towers Outdoor Education Centre (Towers) near Betws-y-Coed in North Wales. Towers offers outdoor education activity to school pupils from Wolverhampton and other schools, outside of the Wolverhampton area, to support learning and personal development as outlined in the National Curriculum. In the financial year of 2018-2019, 18 Wolverhampton schools utilised the Towers Outdoor Education Centre totalling 33 bookings (see appendix 1). The remaining 84 schools did not access the Towers in 2018/19 but did offer a range of alternative provision including on-site, local, regional and national facilities.
- 2.2 The draft 2020-2021 net budget for the Towers Outdoor Education Centre is £150,000. The Medium-Term Financial Strategy 2020-2021 to 2023-2021 presented to Cabinet on 16 October 2019 includes a Budget Reduction Target of £150,000 for the Towers Outdoor Education Centre in 2020-2021. The Council has recognised that it cannot continue to operate Towers on this basis, and consequently committed to a review and options appraisal to minimise the subsidy element in order to provide the most appropriate outdoor education offer to the children and schools of Wolverhampton. Options include:
 - Option 1: Close Towers immediately and dispose via auction (with users signposted to alternative provision)
 - Option 2: Community Asset Transfer
 - Option 3: City of Wolverhampton Council to retain asset, bearing costs for compliance and on-going budget subsidy.
- 2.3 Capital costs of approximately £200,000 for immediate priority compliance works and £400,000 for structural works (within a three to five-year period) have been identified in order for the building to be health and safety compliant.
- 2.4 In an outdoor education survey with 33 school returns, 11 schools who currently do not use Towers stated that their alternative chosen provision included Kingswood Outdoor Education Centre (Kingswood), Condover Centre (Shrewsbury), Brecon Beacons, Larches Wood (Coven), Whitmore Lakes (Lichfield), Manor Adventure (various locations), Mount Cook (Matlock), Duke of Edinburgh (various) and school grounds. Reasons for schools not using the Towers were grouped as distance (5 schools), Cost of both transport and provision (5 schools).

3.0 Progress

- 3.1 In September 2018, CIPFA C. Co Ltd was commissioned to work alongside the Council's internal project team to manage the production of a report which identifies opportunities and options in relation to the future of the site. A Project Board was established to oversee the project and provide a layer of governance and challenge. The board included internal and external representation comprising Education, corporate functions within the Council, an external consultant and 'Friends of Towers'.
- 3.2 One of the options identified within the consultant's report included the exploration of an asset transfer with a local social enterprise (Creating Enterprise) based in Colwyn Bay, North Wales. However, following the identification of immediate priority compliance and health and safety work estimated to be in the region of £200,000, the main facility was temporarily closed in August 2019 and discussions with Creating Enterprise have been deferred pending a Cabinet decision regarding the future of the facility. During this interim period, some schools have chosen to downsize their bookings and use the smaller accommodation on the site (Anglesey building). A number of other schools continue to access instructional provision on the site but are utilising other accommodation within the locality. Forecasted income associated with these bookings is estimated at £7,000.
- 3.3 As part of the review, a consultation exercise was undertaken with existing users of Towers via the 'Friends of Towers' on 9 December 2019 where an update was given regarding compliance issues associated with the facility. In addition, proposed options regarding the future of the facility were also set out. Following the meeting, a total of 10 responses were given to a questionnaire with a mixed response suggesting that the Council should either consider an asset transfer or retain the facility (Appendix 2).
- 3.4 As part of the Council's Youth Engagement Strategy (#YES), a consultation exercise was undertaken over the 2019 summer period which generated 1600 responses. Significant feedback was received which indicated that young people would like more community based, local provision and activities. In addition, strong feedback was also received which demonstrates that young people would like to determine future provision and activities through a co-production approach. The revised strategy will ensure delivery of a key priority for CWC which is to develop more activities and opportunities for all Children, Young People and their families across the City. As detailed in the #YES improving how we engage with our children and young people (CYP) report presented to Cabinet on 22 January 2020, growth of £150,000 in 2020-2021 will be re-prioritised to support this agenda.
- 3.5 Having investigated the planning implications with Conwy Council regarding the future of the site, research has shown that any disposal would need to be undertaken on the basis that existing use would need to be retained. Consequently, the scope for future use combined with the poor condition of the building would limit the value of the facility. It should also be noted that planning permission would be required for any change of use to the site which may be unlikely given that the facility is based in the National Snowdonia park.

4.0 Options Appraisal

The following options are proposed regarding the future of the facility:

4.1 Option 1 – Close Towers immediately and dispose via auction (with users signposted to alternative provision)

Timescale for disposal: two months (subject to auction dates). This disposal method represents the most efficient way to dispose of the property in terms of releasing it from the Council and generating a capital receipt. Once the property is vacant and formally declared surplus via Cabinet, the Council would instruct an auctioneer to offer the property for sale at the next available auction. Under this scenario, the facility would be sold to the highest bidder. There would be a risk that no bidder comes forward at auction, but this may be deemed to be minimal and it would leave the Council free to pursue other options.

Advantages and Opportunities

- Quickest method of disposing the property via the open market
- Ensures that best consideration is achieved in monetary terms
- Wide audience of potential purchasers
- No cost to the Council, purchaser pays auctioneer's fees
- Minimises void costs

Disadvantages and Risks

- Post-sale control is limited
- No ability to assess eventual purchaser pre-sale
- No account taken of non-monetary benefits (social, environmental, economic)
- Interest / demand may be poor
- May not sell
- Loss of jobs
- 4.2 **Option 2: Community Asset Transfer** –. A flow chart detailing the Council's disposal process (including links to the asset transfer process) is detailed in Appendix 3.

It is anticipated that this process would take between 12-18 months to. Under this option the council would be required to undertake immediate priority compliance works estimated at £200,000 but would transfer the longer-term structural costs estimated at approximately £400,000 to the tenant. The Council would be required to bear the costs associated with staffing during the transfer period as detailed section 7.6. As the Council cannot identify the required funding to address priority compliance works, and asset transfers can take at least 12 months to complete, a phased approach would be required.

Advantages and opportunities:

- Ability to safeguard provision
- Potential for external partner to invest in facility
- Enhanced and modernised facility could be utilised more commercially at weekends and during holiday periods

Disadvantages and risks:

- Risk of asset transfer collapsing and facility being returned to Council as a liability
- Capital Costs associated with Asset Transfer in excess of £200,000.
- Loss of staff during this period, which may affect the delivery of the service, resulting in the cancellation of current bookings and loss of income.

4.3 Option 3 – City of Wolverhampton Council to retain asset, bearing costs for compliance and on-going budget subsidy.

In order to retain the asset, the Council would need to invest in immediate compliance works estimated at £200,000, further structural works estimated at £400,000 and in order to commercialise the facility, up to a further £1.1 million in refurbishment and modernisation costs.

Advantages and Opportunities

• Enhanced and modernised facility which could be utilised more commercially at weekends and during holiday periods.

Disadvantages and risks

- Costs in excess of £1.7 million
- Lost income and staff not fully deployed during refurbishment period
- Total costs to modernise in excess of value of property

5.0 Evaluation of alternative options

5.1 An alternative option to work in partnership with local Multi Academy Trusts was raised post consultation phase. Although little work has been undertaken to explore this option further, it is proposed that Multi Academy Trust partners within the city will be alerted to any relevant opportunities arising from the Cabinet decision making process as deemed appropriate.

6.0 Financial Implications

- 6.1 The 2019-2020 gross budget for the Towers Outdoor Education Centre is £449,000. The service has an income budget of £305,000, giving an annual net budget of £144,000. In addition, there are costs held in Corporate Landlord for utilities, general repairs and maintenance, and surveys, these average out to around £60,000 per year.
- 6.2 The Medium-Term Financial Strategy 2020-2021 to 2023-2024 (MTFS) presented to Cabinet on 16 October 2019 includes a Budget Reduction Target of £150,000 in 2020-2021 for the Towers Outdoor Activity Centre.
- 6.3 The forecast financial implications associated with each option are detailed below.

- 6.4 **Option 1** Close the site immediately. This option will deliver the budget reduction target in full. There will be some short-term costs associated with the closure and disposal of the site; including one off pilon cost and redundancy costs, and security costs whilst the Centre is held vacant until disposal. Security costs are forecast to be in the region of £500 per month.
- 6.5 **Option 2 –** Community Asset Transfer. This option will not deliver the budget reduction target as currently included in the MTFS. The budget reduction target will not be delivered until the asset has been transferred which is likely to take 12 to 18 months. In addition, priority capital compliance works will need to be carried out before the asset transfer can be concluded, these costs are estimated to be in the region of £200,000. There is currently no approval for this within the Capital Programme.
- 6.6 Parts of the site will need to be closed whilst these capital works are carried out, in addition, the main Towers building will remain out of operation during the whole period; this will impact on the income generated by the Centre. Based on the current operational costs and forecast income that could be generated from the building during this period, the annual cost of retaining the Centre is forecast to be in the region of £290,000.
- 6.7 **Option 3** Retain the asset and reduce subsidy. This option will not deliver the budget reduction target currently included in the MTFS. This option would require significant capital expenditure to carry out priority compliance and structural works, as well as a full refurbishment to enable the Centre to operation more commercially in order to reduce the subsidy. The estimated total costs of these capital works are in the region of £1.7 million. The annual revenue cost of this borrowing is £120,000. There is currently no approval in the Capital Programme.
- 6.8 The timescale of these works is not yet known; however, it is likely that the Centre would need to be closed in part or full to enable these works to be carried out; this will impact on the Centres ability to generate income Based on the current operational costs and reduced income that could be generated from the building during this period, the annual cost of the centre whilst the capital work is being undertaken is in the region of £430,000. Once the centre is refurbished and fully operational, additional income of £270,000 (£150,000 net budget plus £120,000 borrowing costs) would need to be generated in order to reduce the subsidy. This is likely to take several years to achieve.
- 6.9 There will also be additional costs in future years with ensuring the Centre is maintained to a good standard.

[Finance Code: AS/28012020/Q]

7.0 Legal implications

- 7.1 A disposal via auction or tender would be carried out in accordance with usual conveyancing procedures and would leave the Council with no ongoing liabilities.
- 7.2 Under option 3 the Council would need to ensure that it is not in breach of S.123 Local Government Act 1972 which requires the Council to obtain best consideration reasonably available when disposing of an asset. A lease for a term of more than seven years is regarded as a disposal. A general consent has been issued by the Secretary of State allowing transfers at an undervalue which are for community benefit, but only where the

Page 9

undervalue is less than £2 million. In order to ensure that this is complied with, a detailed valuation would be required.

In addition to the S.123 requirements, a transfer or lease at an undervalue may also contravene State Aid requirements. The specific details of any community asset transfer would need to be considered to ensure that they are in compliance with State Aid requirements.

It should also be noted that if any of the consideration was non-cash and included the provision of service, the Council would need to consider whether this necessitated a formal procurement exercise

The terms of any lease would need to ensure that the entire repairing liability was passed to the Tenant. Given that the property is in a poor condition this may make a community asset transfer unattractive for potential tenants.

- 7.3 Under Option 4 the Council would be required to ensure all compliance work is carried out and continue to finance the service
- 7.4 The Council is obliged to consider any expression of interest from a community or voluntary body to run a service in accordance with S.81 Localism Act 2011. The expression of interest must include information about the financial resources of the body expressing an interest, evidence that they could run or assist in running the service, information about the outcomes to be achieved and details of how it will engage employees. If the Council accepts an expression of interest it is required to run a procurement exercise. The Council is also able to specify a period during which it will accept expressions of interest for a particular service.

[Legal Code: TS/10012020/R]

8.0 Equalities implications

8.1 An equality analysis has been undertaken against each of the options with a supplementary analysis to be undertaken pending the cabinet decision.

9.0 Environmental implications

9.1 There are no immediate environmental implications associated within this report.

However, if further work to the facility is undertaken as part of an investment programme, advice will be taken from appropriate agencies.

10.0 Health and Wellbeing Implications

10.1 The facility provides children and young people within the city the opportunity to experience healthy lifestyle related activity. It is essential that alternative provision be made in the event of option 1 being executed.

11.0 Project Implications

11.1 Required documentation was completed for the initial phase of this project. However, if the first recommendation is agreed a further project plan will be created with a monitoring system and governance arrangements in place to drive the programme and manage performance.

12.0 Human resources implications

12.1 In the event of a closure, staff will be consulted, and redundancies will apply. A dialogue has been opened with Conwy Council to explore the possibility of redeployment. In the event of a TUPE transfer, HR policies and procedures will be followed. There are no foreseen immediate HR implications for option 3. However, a more commercial operating model may require a restructure to be undertaken to ensure the required skill sets exists within the service.

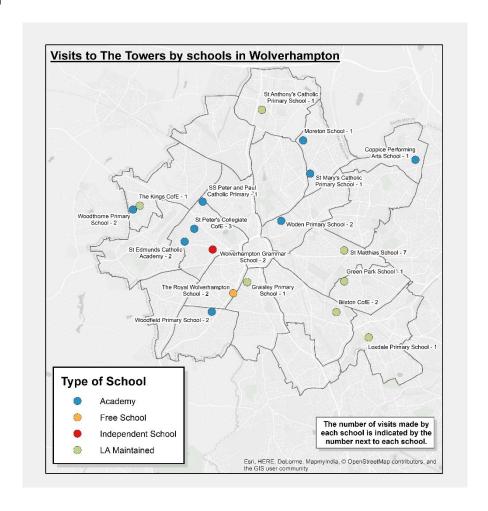
13.0 Corporate landlord implications

13.1 In the event of a disposal and sale of the facility, Corporate Landlord would lead on the process. In the event of an asset transfer, Corporate Landlord would lead on the development of a proposed long-term lease between the Council and the successful party.

14.0 Appendices

- 14.1 Appendix 1 Wolverhampton Schools visits to the Towers Outdoor Education Centre
- 14.2 Appendix 2 User Consultation Responses
- 14.3 Appendix 3 Surplus Property Disposal process

Appendix 1



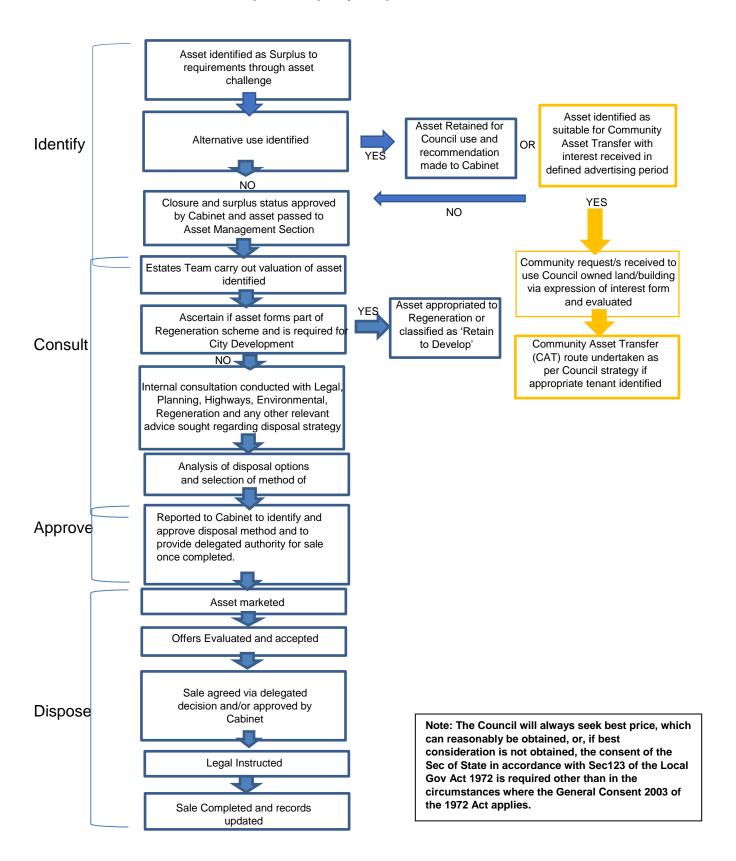
Icon on map	Type of School	School Name	Number of Visits	
	Academy	Coppice Performing Arts School	1	
	Academy Moreton School		1	
	Academy	SS Peter and Paul Catholic Primary	1	
	Academy	St Edmunds Catholic Academy	2	
	Academy	St Mary's Catholic Primary School	1	
	Academy	3		
	Academy	Woden Primary School	2	
•	Academy	Woodfield Primary School	2	
	Academy	Woodthorne Primary School	2	
•	Free School	The Royal Wolverhampton School	2	
•	Independent School	Wolverhampton Grammar School	2	
	LA Maintained	Bilston CofE Primary School	2	
	LA Maintained	Graisley Primary School	1	
	LA Maintained	Green Park School	1	
	LA Maintained	The Kings CofE School	1	
	LA Maintained	Loxdale Primary School	1	
	LA Maintained	St Anthony's Catholic Primary School	1	
	LA Maintained	St Matthias School	7	

[PROTECT]

Appendix 2 - User Consultation Responses
Attached Excel Spreadsheet

Appendix 3

Surplus Property Disposal Process



	Email - bmartin@bilstoncofeprimary.co.uk	Trudy O'Hara - Wolverhampton Mencap and Gateway Email - trudyohara@hotmail.com 152 Spies Lane, Halesowen, B62 9SR	Nick Dixon - Towers Email - nickdixon1609@gmail.com	Liz Butler - Towers Friends Email - liz@gelliaur.com 07759918121	,	Elaine Warren, Emma Skidmore, Abigail Corns Email - elaine.warren@wodenprimary.org, emma.skidmore@wodenprimary.org abigail.corns@wodenprimary.org 01902 558880	Matthew Bradbury St Anthony's Catholic Primary School Stafford Road, Fordhouses, Wolverhampton	Truan Cothey Email - tjc@wgs-sch.net Wolverhampton Grammar School, Compton Road, Wolverhampton, WV3 9RB
Question	Response 1	Response 2	Response 3	Response 4	Response 5	Response 6	Response 7	Response 8
1- The transfer of the facility and staff to another provider within a 12 month period	Having listened to what has been said on the matter – this seems to be the most viable option and would be the option I would prefer if the council are not willing to continue their support of what is an extremely valuable and worthwhile provision for the children of Wolverhampton.	This seems to me to be a good long-term aim. In the meantime, while we wailt for extensive repair work schools, and groups such as mine must look elsewhere for good quality ODP provision - and it is hard of find anywhere else.	This is the best option given that the Council would like to lose the liability of the centre and also the subsidy costs which will always be significant if schools want exclusive use and high quality outdoor education. I would like to see that the essential character of the Towers is maintained and that it continues to give great value (in educational terms) to the children of Wolverhampton and that it is not pushed down the route of low value and cheaper taste sessions as given by private centres more local to Wolverhampton. In the new Ofsted Four-part Judgement which is the criteria for assessment for schools the 3rd area (of 4) is "Personal Development" which incorporates Character development, curriculum beyond the classroom, visits, health and well-being, and the Towers is perfectly placed to help ou schools with this. If another provider could be found with expertise in making good money out of the weeks which the Tower is not operating with schools (and this could amount to almost half of the year with non Wolverhampton schools) then this could offset the costs of running with a slight subsidy with the Wolverhampton schoools. The	The building and its maintenance would not be a problem for Wolverhampton council. Staff would have some security of employment. Risk The ethos of outdoor education as provided currently could be lost. The cost could become prohibitive for families from Wolverhampton	should allow some priority use for Wolverhampton young people and hopefully use existing staff, knowledge and expertise. If the Council could finance the repair work to reopen the facility	W-ton council to take on short term costs of essential remedial works to enable Towers to reopen as safely and quickly as possible. Alongside this, conversations to be held with alternative providers for the long-term future.	If the opportunities that Towers has provided to generations of Wolverhampton children can be maintained, then this is a viable option.	This would be the best option for all parties. However, if the council continues to stall/ block on the intial emergency repairs, this would become unworkable.
2 - Closure and sale of the facility with users being signposted to alternative provision	In my opinion, this is not an option that should even be considered.	This would be a sad day for generations of Wolverhampton Citizens. The Towers has been a part of life for decades and is a valuable resource - hard to replicate.	as it is has little worth in its current state, the children of Wolverhampton would lose the ability to visit the centre, the educational value would be lost (which has affected the lives of 100 000 children from the city since 1961). There may be some political cost and several Wolverhampton employees would be made redundant.	Only to City of Wolverhampton council budget and only short term . No other	This would be a sad loss to Wolverhampton given the outstanding personalised provision it has given to Wolverhampton residents over many many years.	This is an unviable option .There are too many benefits of the Towers to the children of Wolverhampton. The closure would be detrimental to the health and well-being of young people.	I think this would be lamentable decision considering what the City would lose.	The council would be letting down the children who use Towers. This is an unacceptable option and one which would be occurring only as a result of the council's neglect and poor management. This would be an admission of poor strategy and den pupils this valuable asset in the future.
3 - City of Wolverhampton Council to retain asset,	I seriously think that the council should consider this option. Towers has	Hearing about short-term complicance works, that could make Towers safe enough to	With significant investment and a value put on the educational input that the centre	Risk	I think given the financial outlay needed to repair and continue to	Partial option please see option 1.	Whist financial constraints are very pressing, the	I appreciate the council's desire to spend money on
subsidy	over 50 Years. This provision is even more valuable in the times in which we live. Children's well-being and mental health is a very serious issue and Towers is an asset that could provide for wonderful support of provision to improve the well-being of the pupils of Wolverhampton schools.	accommodate groups in a fairly short amount of time, has persuaded me that this is the way to go. If we wait for long-term solutions Towers will lose revenue and schools and groups will be forced to look elsewhere.	council only has limited funds). In the short to medium term this may be a necessary option to get the centre up and running again.	Any old building could always swallow large amounts of money endlessly. It looks as it the real figure for now is somewhere between 54k and 154k. The subsidy could and should be addressed. It has long been signalled that a cost neutral centre would do very little work for the young people of Wolverhampton, whilst if it remains a service for Wolverhampton children it will always have a cost. Benefits Massive if you leave out the money element. The value of the building alone in what has just been voted Europe's best National park will be large in the future. The value of the work done for young people from Wolverhampton is inestimable	1		(many of whom come from difficult backgrounds) is massive. Towers must be viewed as a asset for the city to enjoy and benefit from.	
4 - Suggested alternative options	facility is used and how extra revenue could be generated. For example during term times the facility to be kept for the use of Wolverhampton schools, but during school holidays and weekends, the facility could be	Not an option but an observation. Despite the conclusions drawn by the consultants Towers has actually proved to be a good resource for both the learning disabled and the physically disabled: eg Green Park School uaed to take groups five times a year and both Pennfields and Penn Hall schools were frequent users. My own club (Gateway; a Mencap organisation) has attended Towers twice a year for decades.		A small council linked housing company based in North Wales are or were of the opinion that the building could be improved, then run at a sufficient profit to enable them to continue the subsidy for Wolverhampton schools for a significant number of weeks. The council are missing a trick here. There are so many uses the building could be put to – all sorts of breaks, holidays, courses for all sorts of people who would be prepared to pay to stay in an iconic, historic building in the centre of the Snowdonia National park. I personally know of a converted church just 3 miles away that sleeps 12 people self catering at a block price of £1200 per night. They only open Friday and Saturday and are full for the next year. If creating enterprise could find a business plan that made a substantial profit then surely the City of Wolverhampton council could do the same and then use a proportion of the profits to continue to provide outdoor education for the very deserving but not wealthy children and families in their constituency. This would need to be a group or organisation within Wolverhampton and not the Towers staff directly. They would be able to provide the courses they are so very good at for young people and I am sure it would be an added bonus to other groups using the Centre if they could also access some adventurous outdoor activities as		Lottery funding Just Giving Page	A review of the required work needs to be undertaken to possibly get Towers opened and becoming a viable business again. This would make option 1 much more possible.	Action as soon as possible otherwise the inevitable, avoidable option will incur.
5 - Any other comments	find it appalling that the council are willing to write off debts of over £600,000, but appear to be unwilling to consider continuing to support a very valuable asset which serves the children of Wolverhampton.	I feel that the renovations are an opportunity to reinforce the inclusive nature of Towers. It need not be costly. I acknowledge that (eg) a minibus with a lift for wheelchair-users would be expensive but (eg) handrails in the corridors and a changing bed would be more affordable and might help to 'sell' Towers as an attractive option for special needs groups across the country.	The reduction in staffing with the departure of Liz, Jill and Lorenza and a scaling down of instructional staffing, will make scaling up to normal operation difficult and require serious thinking should money be found for the building works.	1		Please see testimonials on Facebook where over 1000 shares and historical comments have been made. Hundreds of people are willing to write letters and support the council in keeping the Towers open.) N/A	Act quickly please

