HEARING STATEMENT
Suffolk Coastal Local Plan Examination

Matter 3 Area Specific Strategies

Policy 12.29

South Saxmundham Garden Neighbourhood

Education

Chris Edwards
Section One

Personal statement

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Former Director Development and Asset Management, Gateway Housing Association, London

Lead member Neighbourhood Planning Group, Stradbrooke, drafted Plan Vision and objectives, and drafted initial polices for examined and Made Neighbourhood Plan Jan 2019

MCHLG Neighbourhood Plan “Champion”

Private property investor and property/planning consultant
Section Two

Policy SCLP12.29: South Saxmundham Garden Neighbourhood

3.40 Would the Policy be effective in achieving the provision of required education facilities? Is it justified to include early years provision within both criteria a) and b)?

Outline submission Brief

This submission develops arguments made in Reg 19 submissions. Regarding effectiveness of the 12.29 policy on education - see p 1531 Plan representations in Plan order.

Effectiveness is deemed to run for the plan period, over which time growth inevitably occurs. The policy anticipates growth because it plans for a 420-place school when only 210 places are stated as the foreseeable future need. Effective education facilities must therefore mean facilities capable of expanding to accommodate up to a maximum of 420 pupil places within Policy guidelines and constraints, within a sustainable development context.

NPPF States para 94:

“It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications;

and b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted”

NPPF states: Considering development proposals Para 108.

In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users; and

c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
Section Three Hearing Statement

1. The WSP Plan transport modelling Document D32 of Jan 2019 on the Examination Evidence database models 800 homes and 550 jobs (p40). It does not take account of the possibility of any school, and especially not of the impact of a 420-place school, on a 32 ha land parcel site with one proposed access point to a major A road on one side and constrained alternative means of access on the three other sides of the site.

2. The Inspector’s question therefore cannot be answered now with any certainty at all as no evidence exists to affirm or deny the policy effectiveness on an important NPPF matter as per Paras 94 (b) and 108 (c) above.

3. The matter must be therefore be deferred and remodelling commissioned to consider the impact and the mitigation required in order to make an informed judgement on effectiveness over the plan period in such an important matter.

Leaving this aside let us assume the evidence does exist and the single access site can model to bear the peak trip movements generated by 420 pupils, and the financial burden of mitigating the school impact on the highway. What should that model look like? How do we get there?

4. Defining the methodology to derive this model is a key planning input issue that needs to be agreed and then remodelled before the plan is made and not left to the formulation of a travel plan at application stage for following reasons.

5. The school site is an allocation of 2.2 ha of land, each ha equally capable of holding a density of up to 25 dwellings per hectare according to Aspinall Verdi Viability assumptions for the site on a gross site (site 714) of 32 ha. The 32 ha site, measured by the landowner’s reg 18 site plan submission, must also include 800 homes; a spine road; community facilities; SUDS; acoustic bunding (not in the policy but essential); a community hub; a retail area, and cycle/ pedestrian routes.

6. The margins for error in planning at this density and complexity within these design and spatial constraints are small. Therefore there is a high risk of getting it wrong. This is presumably the reason the NPPF wisely requires these matters be resolved before any plan (or allocation) is made.

7. The lack of modelling for trip generation mitigation also means the cost of the mitigation has not been included into the whole plan viability assessment, nor has the spatial impact of the mitigation if needed on site planned for in the masterplan.

8. Is it all affordable? We do not know because the matter has not been costed in with the other policy requirements.

9. SCC note in their submission:
   “The County Council does not object to the reference to facilities being shared
between the new primary school and the existing Saxmundham Free School (an 11-16 secondary school), especially if it provides opportunities for the Free School to expand in the longer term, but the new primary school will need sufficient land (2.2ha) to enable it to operate independently. The operator of the new primary school will be determined through an open competition and so it cannot be guaranteed that the new school will be operated by the same provider as Saxmundham Free School."

10. The key school determinants for effectiveness are:
   First - sufficient land to build the school and able to expand to meet demand without constraint;
   Second - secured developer capital funding;
   Third - an operator, who may not be the existing secondary school., content with the business model for the school;
   Fourth - a suitable location that can comply with NPPF policy requirements/mitigate itself; and
   Fifth - a development which enables the site to offer affordable housing and all other policy requirements.

11. Only if all five are in place before the allocation is made can the policy be considered able to be at least, in theory, effective.

12. The land may or may not be available. The site constraints mean there is limited choice as to location for the school. If it is not close to the Academy it is not foreseeable how the school can be made accessible to pupils from other parts of the Cohort (Benhall and Kelsale), given the restricted site access.

13. Para 94 states Councils should give weight “to development that will widen choice in education”. It is hard to see how this site can demonstrate it will widen choice either for those who live there or those who do not due to the lack of access, unless it is sited close to the entrance to site.

14. New Government guidelines on noise mean acoustic bunding is essential in that location near a main road.

15. Academies run as businesses and Pupil yield to support the pupil roll is critical.

16. The SCC pupil yield methodology driving this policy 800 home 210, place school at 0.25 pupils per dwelling is unsound evidence and out of step with national trends, and cannot therefore make a sound policy or ensure it can demonstrate effectiveness. Ian Flintoff develops this point in the appended document.

17. The principal requirement is not 800 homes but 2.2 ha of land to build a new school and a further area for a pre school.

18. The site for the school could go anywhere a majority of homes are allocated and the school land can be found in more than one place in the town. This
19. The SCC statement p 1597 Plan order notes a “cautious” modelling estimate of 0.25 pupils per dwelling based on dwellings of more than 2 bedrooms.

20. Cerda Planning note in their submission Flintoff’s observations that density to support the number of dwellings on this site and the policy requirement for older people’s accommodation is very likely to mean a significant percentage of these 800 dwellings will be flats.

21. Flats especially one bed flats yield no pupils in the Suffolk County Council Guide to developer Funding methodology.

22. The current pupil yield in Saxmundham appears to have fallen to 0.2 ppd from 0.38 ppd. If this trend holds for this development, it will require over 1000 homes to sustain the school even for 210 pupils. This is set out in an email attached to my Reg 19 submission p 1531 following of Plan representations Plan order.

23. That potentially reduced yield also impacts spatial constraints and transport modelling/peak trip generation as it both pushes up peak trip generation rates but also overall trip movements from a further 200 homes.

24. Transport modelling therefore needs to include modelling reduced pupil yield assumptions on this particular site to measure these potential impacts.

25. Equally though it also needs to model higher pupil yield assumptions in line with other local council methodologies to test an alternative model because the current SCC pupil yield assumption methodology is out of line with national trend and policy direction.

26. Government is moving towards a standardised developer capital and yield calculation as set out in the DFE “Securing developer Contributions” and “Education provision in Garden Communities” papers submitted to SCDC Mark Edgeley and the Inspector’s PO Annette Feaney on 31 July 2019, but published in April 2019. These documents are not on the Examination Evidence database.

27. These documents stress the need for a high pupil yield modelling methodology for new development. This is in line with current thinking from other Local authorities as noted in the Education report supplied by Ian Flintoff.

28. Pupil yield is a product of housing tenure. Affordable housing is a key yield driver and a 12.29 policy requirement.

29. Housing tenure especially affordable housing is a product of site viability. The policy site is not viable to provide the tenure mix to sustain any level of affordable housing and thus a high pupil yield in line with emerging
Government policy and current trends.

30. The issue of Policy 12.29 site viability is analysed by Bailey Venning, in the Cerda Report Appendix, for Justin Dowley in Matters 1 and 3.

31. In this he shows that the Councils Aspinall Verdi Whole Plan viability is flawed as it ascribes a positive value to the site. However he shows that when one key input which inflates the value output is adjusted to reflect the conventional and required input the site value cannot sustain affordable housing.

32. The policy site is thus even more at risk than this report and its predecessor at Reg 19 records in view of the additional unbudgeted travel mitigation costs noted above.

33. HOWEVER the Ian Flintoff education report shows that a higher per dwelling pupil yield is highly likely to deliver effective school provision from a lower housing quantum given a viable development site.

34. A more viable site can also be one with a more relaxed density capability and therefore greater probability of providing access, choice, design options and future proofing.

35. High yield is a product of value capture and that is derived from land that can sustain high levels of social infrastructure due to low need levels of land infrastructure e.g. drainage and road costs such as roundabouts and noise mitigation requirements.

36. The policy site is a high risk site and cannot be considered capable of effective long term education provision.

37. To be made sound and to give certainty of effective education provision over 20 years, policy 12.29 education needs must be re evaluated against local evidence national practice and national policy and be redrafted to drive up yield based on local evidence of need and not simply to shadow historic trends that are self fulfilling in a downwards direction.

38. If this is done a modified policy can drive up pupil yield objectives thus reducing quantum, and this quantum can then remodelled to the site, and site, to see if it can bear an effective education provision in line with the five requirements of paragraph 10 above.

39. This requires a re-consultation to re model and revaluate site ability to deliver against the five requirements, including a financial assessment of viability, a spatial assessment linked to yield and a transport assessment modelling impact.

40. School capital funding requirement can be modelled and shared between sites so long as land is made available for the school at the start. The school will follow the homes wherever the majority are built.
41. The development site or sites to deliver an effective overriding education policy objective can be allocated according to its/their ability to deliver the priority mindful of the other key requirement of SANG area.

42. NPPF viability guidance applies – “Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.”

43. The current site cannot now be considered realistic in those NPPF terms and for that reason and those above the Policy will not be effective to deliver the provision.

**Proposed Revised methodology for Policy 12.29**

Suffolk County Council bases its pupil yield calculation on a generalised factor of 0.30 – 0.35 (one form of entry based on 500/600 homes) for all new build initial outline applications.

This metric reflects the actual experience of other Local Authorities in largely rural counties.

This formula is refined to create a more precise pupil yield ratio when the detailed housing mix is confirmed and will reflect such key factors as size of home and tenure, especially the proportion of affordable new build which can create significantly higher numbers of school aged children.

The council utilises external research of new build to regularly update its pupil yield formulas to reflect the actual impact of size of building and tenure on pupil yield by school age group.
Appendices

Appendix 1 – Ian Flintoff Report
Section 1.1: Educational Consultant CV

Ian Flintoff, Director, Affirm Consulting

Competence

Educational Qualifications:

* B.A. Honours, St Catherine's College, Oxford (Geography) 1978 – 81
* PGCE Leicester University School of Education 1983/4
* MEd University of London Institute of Education, Geography in Education 1992
* NPQH (National Professional Qualification for Headship) London Leadership Centre 2000

Experience

*Senior management school leadership experience of 20 years including 14 years as a headteacher in two schools

*Extensive experience in every aspect of running schools – teaching and learning, standards and student outcomes, finance/premises, curriculum, student behaviour, pastoral/welfare/safeguarding, staffing recruitment, retention, capability, disciplinary issues, governance, academy status, managing change across organisations

*Headteacher, Leiston High School later Alde Valley School, Suffolk from 2005 - 2014.

*Major experience in partnership work with the following Suffolk High Schools: Bungay HS, Sir John Leman, Stradbroke BEC, Lowestoft College: led creation of £3.5 million North Suffolk Skills Centre in 2007, created major links with businesses in local area to support student learning and work – related curriculum.

*Managed closure of two middle schools, expansion of existing upper school and rebranding to full 11-18 phase institution 2010 - 2013

*Managed impact of local Free School 2010 – 2013, and initial work on transition to academy status.

*Executive Headteacher role to support existing leadership to bring middle school out of Special Measures within 4 terms prior to closure in 2012 with OFSTED “Good” judgement for leadership and management.
Section 2: Education Consultant report on Pupil yield methodology

2.1 Pupil Yield is a critical determinant of school capacity

The draft Policy 12.29 proposes to meet future educational need based on an allocation of 800 homes using the SCC 0.25 pupil per dwelling s 106 calculation. Providing a new school with absolute capacity for 210 places is taken as the justification for allocating 800 homes rather than an accurate pupil yield methodology being applied to calculate the necessary allocation to justify a new school.

This approach is both an inverse justification for a housing allocation and out of step with current national methodology. It is therefore not a sound basis for calculating pupil yield nor from which to extrapolate housing numbers for an allocation.

2.2 Pupil yield is apparently in decline in Suffolk Coastal area and yet the Policy does not reflect this

The proposal makes only brief evidential reference to a clear demographic decline to 2022/23 and associated fall in on-roll projections for two of the three schools. The 2017 ONS statistics for Suffolk Coastal population taken with segment 0-16 between 1997-2037 shows a projected decline from around 20% to 15%. This is steeper than for the UK as a whole. It seems quite likely that the surplus places issue identified by the County Council in the three schools will continue to rise.

Policy 12.29 by implication requires a mix of flats for older people and starter flats for adults without children. These are usually one bed flats and neither tenure types yields 0.25 pupils per dwelling. One bed flats are zero rated in the SCC methodology. Thus the potential pool of catchment homes is significantly lower than 800, perhaps as low as 600. Taking the current assumption of 0.25 would thus yield 150 pupils. Given the projected falling roll this is financially unsustainable. However numbers are not the primary driver for yield (see next section).

An additional factor may be that the decision to locate the new school and early years facility (and it is not clear from the proposal if this is private wrap around care or a school nursery) within the development further reduces the available land for housing. This makes it more likely that flats and starter homes/downsizer homes will rise in proportion to that of affordable housing of 3 bedrooms or more.

It is worth noting that a condition of any Funding Agreement signed by the Department for Education (DfE) with the successful MAT that will run the new primary school/early years provision will stipulate that the site of the proposed school should be the most advantageous and appropriate for the school pupils and parents. The DfE will therefore have critical decision-making powers in this regard.
In general terms the school will follow the majority of houses as it would make no sense to build in isolation. Although Government wants to make best use of land and there is an argument for sharing the land with the high school this is arguably not the best place to locate an accessible school; there do seem to be two other sites in the town that could better serve primary need and these should be explored to determine which of them offers the better pupil yield in view of the locally identified need for large 3 and 4 bed affordable homes.

2.3 SCC Pupil Yield methodology is flawed

The provision of a one form entry primary school and early years provision within the proposed development and its sustainability into the future depends critically upon the robustness and accuracy of Pupil Yield calculation that is used by the County Council.

The Council’s current Topic Paper and methodology date from July 2015. The “Section 106 Developers Guide to Infrastructure Contributions in Suffolk” uses a Pupil Yield Factor of 0.25 for new build pupil quanta, drawn largely from the most recent census data (2011), and other data such as “Area Health Authority statistics on live births and information from health visitors and doctor’s practices. Further information includes pupil arrival rates and pupils from new housing developments”.

The Council’s PPR is based on a combination of outdated historic census data, health data and other secondary data about housing developments in the public arena. It seems not to have been reviewed for several years and, critically, has not been subject to any rigorous review based on external research of the actual pupil yield from all new housing developments over a recent fixed time period.

One recent example from Suffolk illustrates the uncertainty of the generalised 0.25 pupil yield formula. In Red Lodge, Forest Heath, an initial 1200 home new build led to a new 1.5 form entry school (St Christopher’s CEVAP School) which opened in 2012 with 315 places using the 0.25 PPR formula. By 2014 the school roll had grown so rapidly that the OFSTED report of 2014 indicates in its opening statement that the leadership of the school were “overwhelmed” by the speed of pupil admissions which was unforeseen and was a significant factor in the overall judgement of “Inadequate”.

Many other Local Authorities have commissioned recent and detailed external specialised research to ascertain what might be the most accurate and robust PPR given the actual pupil yield. This must take account of key factors such as, and especially:

- the age distribution of children
- housing type
- housing tenure.

In all such cases, detailed data has generated a higher PPR for early years and primary age children. Consequently, and very appositely given the current financial
challenges for Local Authorities, a higher and more accurate pupil yield is also a sounder basis for calculating Section 106 developer contributions.

For example, Somerset County Council’s (see example with link below) new Section 106 contribution requests based on the new PPR of 0.32 and average cost per pupil based on actual project costs September 2016 – September 2018 is set at £17,074 compared to Suffolk CC £12,181 although this is stated to be index linked.

2.4 Recent examples of Local Authority external reviews of pupil yield assumptions with rural/semi – rural locations

**Somerset County Council**
After research by Cognisant Research the Council changed its PPR for primary age pupils from 0.20 to 0.32. In some housing developments the pupil yield turned out to be significantly higher than the Somerset County Council PPR. Some estates for example generated 45 pupils per 150 houses rather than the 30 estimated by the PPR.

**Milton Keynes**
Market Research by Cognisant Research indicated that in housing developments between 2012-2017 peak PPR was typically 0.45 for pre-school and 0.60 for primary age children, with considerably larger numbers of pre-school children at the start of the housing sales than had been expected which mirrors the situation in Somerset.

**Central Bedfordshire Council**
In July 2017, the Council, based on research it commissioned on pupil yield in recent housing developments, changed its pupil yield assumption from 1 form of entry per 750 homes to 1 form of entry from 500 homes. This is now the same PPR as is used in the neighbouring authorities of Hertfordshire and Bedfordshire.

**Cambridgeshire County Council**
Work carried out by Cambridgeshire Council Research Group for September 2015 suggests that the general pupil yield calculator tended to underestimate the actual numbers of early years and primary age pupils against broad proposals for housing development based on a total quantum and aspirational statements. A new composite model was proposed to reflect key aspects such as size and tenure when considering a detailed housing mix. The final outcome of the research produced an outcome and proposal which is very close to that proposed by Northamptonshire.

**Northamptonshire County Council**
Research into actual pupil yield identified the crucial factors of size of housing and especially the percentage of affordable housing delivered which had a very substantial effect on the pupil numbers and viability of schools, most particularly in the more rural areas.
Table 14: Number of Children per hundred houses living in new developments taken from Northamptonshire County Council Population Forecasting Report 2014

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2.5 Specific aspects affecting assumptions around pupil yield in all of the above

Age distribution effects on PPR

A one form entry school typically opens with an early years/nursery provision (where planned) and admission of Years 1 and 2 in year one of its operation, building up as the initial cohorts move through the school in successive years so that by year 5 it will have a full primary age population. The initial and critical factor for planners to take into account is the age distribution of the children forming the families who take up residence in the very first years. This is succinctly expressed by some experts in the field of pupil yield research:

_However, the key issue to understand is the variations in age between the children and how this will impact on pupil place planning. It is not uncommon to see new dwellings yield twice the number of primary school children in Reception as at the top end of the school, in Year 6. If a 1,000 dwelling development generated 60 four-year-olds, this would suggest a two form of entry school, but the same development might only yield 30 eleven-year-olds, requiring only one form of entry. Over time, the estate is likely to normalise with the demand for places seen across the rest of the authority and understanding how long this process takes is key to planning how best to upscale provision and accommodate the initial bulge in demand (Cognisant Research, March 2018)_.

Effects of tenure on the PPR

It is now well known that social rented housing generates more primary age pupils than market sale housing. In the example authorities quoted above, the PPR can be significantly higher in new builds where the percentage of affordable homes generated a PPR of 0.49 as against 0.27 for owner-occupied in Milton Keynes (see link above) for example. The work by all councils quoted above is based on the assumption that tenure is a critical factor for both raising and sustaining pupil yield over time.

The actual delivery of a policy compliant range and type of affordable homes in Policy 12.29 is therefore critical to the sustainability of the proposed primary school/early years provision given the demographic decline noted above.

Impact on Tenure of development with low levels of affordable housing
Research across a range of 8 rural local authorities by CPRE and Shelter in 2018 indicated that typically less than 50% of the planned affordable housing was delivered in the developments under study. The social equity implications of such a situation in rural areas where many are priced out of new housing not only reduces the likelihood of a primary school being sustainable in the short term but also reduces the sustainability of all primary schools within a locality. In the case of the development under consideration it means that any new primary school will likely take a considerable time and probably more than 5 years from start of development to achieve financial sustainability. That means at least 2029 assuming a start on site in 2024, but in this case if the declining demographic continues it may be considerably longer than this.

Finally, a major omission in the planning considerations and the policy is the increasing difficulty in recruitment and retention of teaching staff, especially in the primary sector and is already a major problem for schools in the Suffolk Coastal area. The lack of affordable housing is linked very strongly to the problems of being able to recruit key workers such as primary teachers in rural areas (see for example, CPRE submission to National Planning Policy Framework, April 2019).

Positive Development Viability is crucial to tenure mix

The Bailey Venning Viability Regulation 19 report attached to the Leave the Layers Alone submission shows the policy site 12,29 cannot afford the policy requirement percentage of affordable housing or indeed any affordable housing due to heavy infrastructure burdens.

The impact on primary pupil yield of any reduction from policy is significant. The social mix of the pupil population is much narrower. Where there are pockets of deprivation such as within the Saxmundham locality this has implications for the life chances and opportunities for lower income families seeking secure housing and a permanent primary school place for their children.

2.6 Conclusions regarding proposed development of a one form entry primary school/early years unit

1. The evidence strongly suggests that the current Suffolk County Council generalised metric for forecasting pupil yield is a blunt and unhelpful tool to forecast yield.
2. The argument for 800 homes justifying a school is not supported by the evidence. Based on other council’s experiences pupil yield is directly influenced by the key factor of tenure not necessarily numbers of homes, see point 6 below
3. Suffolk County Council should review its own pupil yield calculations by commissioning external research to ascertain detailed statistics on all new build developments over the last 5 years. This would generate a robust data set around which to review its PPR for any future development. Information about detailed housing mix from the proposal would enable more accurate forecasting of actual pupil yield.
4. The pupil yield example of Northamptonshire Council which incorporates the critical factors of tenure and size of property suggests a more useful working model than a simple single (blunt) metric such as the current Suffolk County Council PPR.

5. If the Council decides not to undertake such research, a modest increase in the PPR in line with some of the neighbouring local authorities (e.g. Essex 0.30) and those quoted above will potentially generate more of the Section 106 funding per dwelling required to secure the creation of a new one form entry primary school. However, in the absence of a robust data set, a lack of forecasts for sustained yield over the critical first five years of the school's existence is a major risk factor.

6. The evidence of other local authorities suggests a modest increase of the PPR to 0.30 could reduce the size of the proposed housing development to perhaps 500 houses and still enable the school to be sustainable at 90% capacity.

7. This is dependent on viability and tenure thus the policy site cannot be considered sound.

8. The policy needs major modification to assist both school sustainability and teacher retention over other requirements for garden city principles e.g. allotments and older people's accommodation.

9. The proportion of affordable housing vis-a-vis market housing is critical to ensure that lower income families with young children can be encouraged to seek residence so that the new school is both viable in its first 5 years and sustainable in the longer term.

10. There are some significant risks to school roll sustainability if the affordability definition is not precisely framed in terms of dwelling size and tenure. The rather generalised conception of affordability in the proposed development will not assist in this regard.

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