

# BURY TOWN CENTRE NIGHT TIME ECONOMY



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#### **GLOSSARY**

- **AGMA Association of Greater Manchester Authorities**
- ATCM Association of Town Centre Managers
- **DPPO** Designated Public Place Order (public place drinking control)
- **EMRO Early Morning Restriction Order**
- LNL Late night levy

Purple Flag – a benchmark for good night time destinations. Town centres that achieve a Purple Flag are those that are safe, vibrant, appealing, well-managed and offer a positive experience to consumers.

Bury Council's statement of licensing policy as required by the Licensing Act 2003 is available via the Council's web site at

http://www.bury.gov.uk/CHttpHandler.ashx?id=6612&p=0

#### THE VISION

The Night Time Economy in Bury Town Centre will be a stimulating destination providing a safe, secure environment with a vibrant choice and rich mix of entertainment and activity that will appeal to a range of age groups, including families, which will change seamlessly throughout the evening.

#### Introduction

Our town centre vision is important as it is set in the context of recently completed development schemes which, together, have the potential to transform perceptions of Bury Town Centre and the way in which buildings and the public realm are used. Of particular significance is the expansion of the retail sector in the daytime economy, the introduction of more options within the early evening up to 11pm and night time economy up to 2am and the interaction between the two. This document aims to provide a proposed framework for all partners and licence holders to consider and look to develop an approach to successfully managing the night time economy and maximise potential benefits.

**Early Evening from 6pm to 11pm** – Our vision is to promote family friendly leisure and entertainment activities supported by easily accessible venues catering for a diverse range of users.

**Night Time from 11pm to 2pm** – Our vision is to promote a more Adult friendly range of entertainment activities and in so doing creating a safer environment for visitors and the resultant need for reduced public service resources covering the early morning period [2am to 6am].

The considerations and issues raised in this document draw upon experience elsewhere and the ATCM Purple Flag Scheme which the Council and partners may ultimately adopt and use to measure progress. Purple Flag is similar to the Green Flag scheme evident in the Council's parks. It is an external accreditation designed to provide recognition that a town or city centre is managing its night time experience and thus helping overcome any negative public perceptions that may exist. It provides the opportunity for a centre to present itself in a positive light to town centre users, including operators, residents, tourists and visitors.

For this document we have defined the town centre as the area shown on the map at Appendix A. Whilst, it covers all the late night town centre bars it also includes the retail areas, town centre restaurants, the cinema & bowling complex, the Met theatres, museums, art gallery, library and the Metrolink and bus stations.

Centres that are generally held to be more successful in developing and exploiting the evening and night time economy in economic and social terms display a much richer mix of attractions catering for clientele which would change seamlessly over the period between the end of the traditional working day and the late evening/early hours. Of particular significance in this are quality restaurants, a vibrant arts and cultural scene, and family friendly facilities. We will encourage a move to facilities that appeal to many different groups particularly families. This is an ambitious project, as

few places outside major city centres are able to avoid a "dead period" in the early evening. However, over recent years the town centre in itself has become the destination with annual day/early evening events such as Glaston-BURY and Light Night. The increasing provision of hotel accommodation supports the theme of Destination Bury.

This document should be considered in conjunction with the Council's wider Licensing Policy as required by the Licensing Act 2003. The aim of the LA 2003 policy is to strike a balance between the safety and amenity of residents, businesses and those working or engaged in normal activity in the Borough whilst encouraging a sustainable and vibrant entertainment and cultural industry. The policy sets out a general approach to the making of licensing decisions that are compatible with the Act and associated guidance. In the context of the defined licensing objectives, which are:

- Prevention of crime and disorder
- Public safety
- Prevention of nuisance and
- Protection of children from harm

Finally, the framework proposed in this document should form part of a cohesive approach to promoting the responsible use of alcohol and consequently minimising the effect on crime and the associated impact on Police, Health and other public authorities. Whilst Bury overall is a relatively safe town, we know that certain areas are blighted by a disproportionate amounts of violent crime. A recent assessment of violent crime in Bury revealed that 14% of the town's violent crime occurs in the town centre. Moreover, the temporal risk profile for violent crime in the town centre indicates the peak risk occurs between 02.00 am and 04.00 am, with Friday, Saturday and Sundays being the high risk days of the week. Our strategy should therefore recognise the risk and ensure that measures are put in place to mitigate this threat to public safety.

#### The Changing face of Bury Town Centre

The summer of 2010 saw the completion of a major town centre extension, The Rock, which has transformed the retail and leisure facilities in the town with half a billion pounds of investment providing an additional 52 new retail units including major national retailers, 8 food and drink outlets, plus a 10 screen Vue cinema, AMF bowling, and over 400 residential units offering a 'city centre living' concept. As a result of these new town centre developments, Bury has become the premier retail centre in the north of the Manchester conurbation. Bury Town Centre now boasts an exciting mix of retail, leisure, tourism, offices and residential property.

Introducing a significant new residential element into the town centre presents both a challenge and an opportunity. The current difficult economic conditions have meant that occupancy of the new apartments has been slower than might have been expected. At May 2012 approximately 25% of the potentially available residential units are occupied. Over time the population will continue to grow and town centre residents will have public service expectations which will bring new pressures on already stretched resources, through the licensing regime, the use of the public realm and associated routine activity such as cleansing. The components of the framework proposed in this document will need to pay particular regard to residents' needs and expectations. Residents will also bring new economic opportunities, for example late

night convenience stores and a different target clientele for restaurants, bars and leisure facilities. Of equal importance is the potential "civilising" influence of a resident population on the public realm. Streets that are busy with people who have a stake in the area going about their normal business are safer than thoroughfares that are deserted other than by those merely moving from one alcohol outlet to another. This factor is something that our any future policy needs to develop and encourage.

In addition, the growing residential population and new office developments in the town centre have the potential to increase the number of new shoppers and leisure consumers. The first phase of the recently completed Knowsley Place development includes 9,000 sq m of quality office space and hotel. Whilst some of the developments are adjacent to rather than directly in the defined town centre area they will provide potential customers for the town centre offer. Chamberhall Business Park, a 45,000 sq m office development, located close to the town centre will provide quality jobs and office space in a parkland setting.

Whilst the physical expansion of Bury Town Centre presents considerable opportunities and challenges, of equal or greater significance is its development from what has been a predominately retail centre into one that has a mixed leisure and residential component. A past criticism of the town centre has been that the night time economy consists of little more than outlets selling alcohol and fast food that compete in terms of price and length of opening hours. In this Bury has been unremarkable as these characteristics are shared with a number of other towns in the north of the Manchester conurbation and more widely in urban centres of a similar size across the country. Bury now has the opportunity to move forward with a much more varied entertainment offer.

There are reputational risks to public authorities and increased direct costs in servicing the new infrastructure, including A&E services, associated with poorly managed town centres. In the recent past, Bury has seen an increase in crime associated with alcohol and the late night economy. The relaxation of the licensing laws has not had the desired civilising influence on binge drinking and alcohol related crime and disorder. With growing crime statistics the Council and it's partner organisations are determined to reverse the trend by achieving the Vision of a safe and secure environment that appeals to all sections of society. Through this strategy we will seek to ensure those visiting Bury town centre enjoy a safe, healthy and risk free experience.

#### The Changing face of Regulation

The Police and Social Responsibility Act 2011 has made a number of amendments to the Licensing Act 2003, of most significance in relation to Bury town centre is the power for the Council to introduce Early Morning Restriction Orders and/ or a Late Night Levy, which are aimed at enabling local licensing authorities to further promote the licensing objectives set out above.

Early Morning Restriction Orders are designed to address recurring problems with alcohol related crime and disorder in the whole or specific areas within the Borough by re-introducing fixed closing times at any time between midnight and 6.00 AM. As crime statistics for Bury show peak levels are in the early hours of the morning,. if the need arises the Council will consult formally on whether to consider introducing a fixed closing time to reflect problematic crime & disorder. In seeking a fixed closing time the Council is aware that there are requirements to consult, advertise the

proposal and demonstrate that there is evidence to justify making an Order, as well as giving full consideration to any representations received.

The health risks associated with over indulgence in alcohol are now well understood and an environment that relies less on heavy alcohol consumption will have added health benefits for the community.

#### Strategic objectives

In order to successfully achieve the vision a number of defined strategic objectives have been identified; they align to the Purple Flag scheme. These are set out below, with a number of factors that will be integral to their achievement

#### Objective 1 - Wellbeing - A welcoming, clean and safe town centre

- Safety. Visible, effective policing and active surveillance
- Care. Responsible guardianship, customer care and concern for community health
- **Regulation**. Positive and proactive licensing and enforcement
- **Services.** Appropriate levels of public utilities
- Partnership Active involvement of businesses in driving standards
- **Perceptions.** A valid and positive presentation of the area to customers and investors

## Objective 2 - Movement - A secure pattern of arrival, circulation and departure

- **Public Transport** Safe, affordable, well managed late night public transport
- Car Parking. An appropriate provision of late night car parking
- **Pedestrian Routes.** Clear, safe and convenient links within the centre and homewards
- **Crowd Management**. Policies to deal with overcrowding, congestion and conflict between moving vehicles and pedestrians
- **Information. Provision of p**ractical information and guidance to town centre users at night
- Partnership. Business and operator commitment and participation

# Objective 3 - Appeal - A vibrant choice and rich mix on entertainment and activity

- Food & Dining. A choice of eating venues and a commitment to good food
- **Pubs and bars.** Well managed venues, to meet varied tastes, and offering more than just alcoholic beverages
- Late Night Venues. A late night offer that compliments the diverse appeal of the centre as a whole
- Early Evening Activity. An active early evening period, including late-opening shops
- **Public Buildings.** Creative and imaginative use of public/ civic buildings in the evening and at night
- Arts & Culture. A vibrant, inclusive arts and cultural scene

#### Objective 4 - Place - A stimulating destination and a vital place

- Location. Appropriate location, clustering and capacity of venue types
- **Diversity.** A successful balance of uses and brands
- Clarity. Well designed links and visible signs
- Animation. Attractive, well used public places, active streets and building frontages
- **Design.** Thoughtful and imaginative design for the night
- **Identity.** The appropriate use of natural and built features to reinforce appeal

#### Linkages

The considerations and issues raised in this Bury Town Centre Evening Economy document demonstrate clear linkages to, and support for:

#### Bury Sustainable Community Strategy 2008 - 2018

In particular the following ambitions:

- The place to live in Greater Manchester
- An area where people feel safe and secure
- A popular visitor destination
- The premier retail town in the north of Greater Manchester
- Quality jobs for Bury people
- A place where each township thrives
- An area with first class services

#### Bury Economic Strategy 2009 - 2018

In particular the following strategic objectives:

- Promoting new business formation, survival and growth
- Strengthening Bury's cultural and tourism offer
- Attracting and retaining talent
- Optimising the economic potential of Bury's town centres and key employment sites

#### **Bury But Better 2009** (Town Centre Vision and Development Strategy)

In particular the following Vision Themes:

- Making the most of Bury's heritage
- Managing of the quality of the town centre
- Broadening the role of the centre

#### Bury Cultural Strategy 2007 - 2010

In particular the following Strategic Objectives:

- To enable older people to enjoy the widest range of cultural opportunities
- To attract high value creative businesses to the Borough and retain creative young people
- To make town centres vibrant and welcoming both during the day and in evenings.

- To remove barriers to participation and the sharing of common cultural experiences
- To promote healthy and active living at all stages of life
- To ensure the best flow of information about cultural activities
- To develop a commitment to partnership working among organisations that control cultural resources

#### **Bury Alcohol Strategy 2008-2011** (currently under review)

In particular the following Strategic Objectives:

- · Improve the management and planning of the night time economy
- · Reduce alcohol related crime and anti-social behaviour

#### Public Health Annual Report 2012

In particular the following policy based objectives:

- Create and develop healthy and sustainable places and communities
- To continue to enjoy strong and effective partnerships.

#### Joint Strategic Needs Assessment 2011

In particular for the following themes that cut across the health and well-being improvement agenda:

- Impact of demographic change in terms of the growing, changing and ageing population in Bury.
- Impact of lifestyle choices.

#### Strategic Threat Assessment

In particular the Assessment recognises:

- A priority to address anti social behaviour through a structured partnership approach designed to reduce on street drinking incidents
- The need to tackle a distinct hotspot of criminal damage, ASB and serious acquisitive crime in the town centre.

#### Greater Manchester Town Centres Policy Position Statement (draft)

Bury Town Centre identified as an existing "Conurbation Accelerator", suggested targeted intervention of support for key retail/leisure core function

#### Purple Flag

Purple Flag is an external accreditation designed to provide recognition that a town or city centre is managing its night time experience (17.00 – 06.00) and thus helping overcome any negative public perceptions that may exist. It provides the opportunity for a centre to present itself in a positive light to town centre users, including operators, residents, tourists and visitors.

Purple Flag has been developed by from original research undertaken by the Civic Trust. This showed that:

 More people would use centres at night if they were safer, more accessible and offered more choice

- A good mix of clientele can lessen intimidation and improve perceptions
- A wider range of attractions and consumers leads to longer term economic viability

Further info at www.purpleflag.org.uk

#### **Performance Management**

It is vital that we are able to measure the success (or otherwise) of any future Bury Night Time Economy Policy. Indicators from the purple flag scheme have been chosen to provide a performance management framework measureable on an annual basis across a broad range of issues. These can be added to as work progresses on individual Component Frameworks. See Appendix B

#### **Management Overview and Scrutiny**

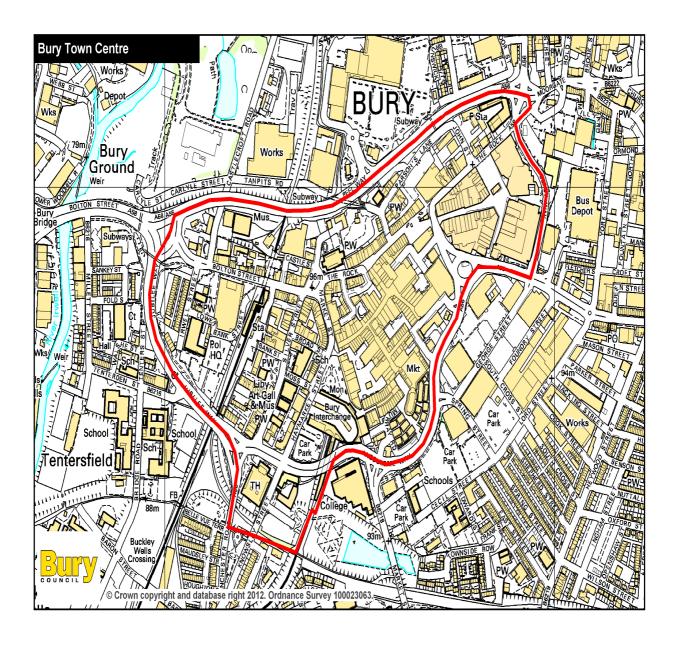
- Town Centre Management business feedback and input
- Team Bury Pub Watch and public disorder
- Licencing Panel Licencing
- Council's scrutiny arrangements general performance issues.

#### **Consultation Arrangement/Timescales**

- A. Feedback to Chief Exec and Chief Supt Sept 2012
- B. Members/ Cabinet/ Licensing Panel
- C. Public/ trade/ planning consultation required particularly if LNL and/ or EMRO being developed



### Appendix A Bury Town Centre



# Appendix B Performance indicators

Suggested reporting arrangements				
Indicator Reported by Comment				
1 Crime /ASB	Police			
2 Alcohol/ harm	PCT	Via A&E		
3 Composition/ choice	Licensing	Not just licensed prem		
4 Footfall	Licensing	Via Rock/ Millgate		
5 Perceptions	Citizens panel	Via DF		
6 Vol & value	To be confirmed			
7 Patronage	Citizens panel	Via DF		

	Heading	Purple Flag Aim	KPI	How Stated	Sources of Data	Detail
1.	Crime & Anti- Social Behaviour	A reducing incidence of NTE-related crime and disorder	Recorded crimes in the town centre at peak times for NTE	<ul> <li>Recorded crimes on Friday and Saturday nights between 8pm and 5am</li> <li>Similar figures for 12 months earlier</li> <li>Positive/negative change over 12 months</li> </ul>	Police statistics	See Purple Flag KPI Toolkit
2.	Alcohol & Health	Reducing levels of alcohol abuse and harm	Alcohol- attributable hospital admissions at peak NTE times	<ul> <li>Alcohol-attributable hospital admissions on Friday and Saturday nights between 8pm and 5am</li> <li>Similar figures for 12 months earlier</li> <li>Positive/negative change over 12 months</li> </ul>	Local hospital statistics	See Purple Flag KPI Toolkit
3.	Composition	Increasing choice and balance of provision for consumers	Progress away from an over-dependence on alcohol-based venues targeting the under 25s and takeaways	Representation of activities regularly open during Purple Flag hours     Proportion of alcohol-based venues targeting the under 25s and takeaways     Positive/negative change over 12 months	Composition survey and analysis, using the 4 Purple Flag categories and 12 subcategories	See Purple Flag KPI Toolkit

	Heading	Purple Flag Aim	КРІ	How Stated	Sources of Data	Detail
4.	Footfall	Increasing the use of the town centre between 5pm and 11pm	Increase in footfall in the town centre at peak NTE times	<ul> <li>Footfall counts 5pm to 11pm on Friday and Saturday nights</li> <li>Similar figures for 12 months earlier</li> <li>Positive/negative change over 12 months</li> </ul>	Commercial surveys	See Purple Flag KPI Toolkit
5.	Perceptions	More positive perceptions of the town centre by users	Increase in those who feel safe in the town centre in the evening and at night	<ul> <li>Proportion of consumers who say they feel safe in the town centre between 5pm and 8pm and between 8pm and 11pm</li> <li>Similar figures for 12 months earlier</li> <li>Positive/negative change over 12 months</li> </ul>	Consumer surveys	See Purple Flag KPI Toolkit
6.	Volume & Value	An increase in business prosperity and local benefit	Rising levels of economic activity & value in NTE businesses	<ul> <li>Volume of NTE business GDP</li> <li>Employment in sector</li> <li>Ranking against other centres</li> <li>Change over 12 months</li> </ul>	<ul> <li>Local estimates</li> <li>NightMix Index</li> </ul>	See Purple Flag KPI Toolkit
7.	Patronage	Widening consumer representation	Increase in use of centre during peak NTE times by families with children & by those over 25 yrs.	Representation of these categories in the town centre on Friday and Saturday nights between 5pm and 11pm Similar figures for 12 months earlier Positive/negative change over 12 months	Consumer survey, potentially as part of No 5 above	See Purple Flag KPI Toolkit

#### Appendix C Licensing Controls

#### 1.0 Introduction

- 1.1 This policy document seeks to support good management and regulation of Bury town centre venues licensed under the provisions of the Licensing Act 2003 amid increasing concerns relating to alcohol fuelled crime and disorder, particularly in relation to those premises that wish to trade through the night and into the early morning.
- 1.2 It is recognised that in some cases the fear of crime and disorder can act as a deterrent for law abiding citizens wishing to participate in town centre night time activities.
- 1.3 A profile of the existing licensed town centre premises is attached at Appendix D.
- 1.4 A summary of past licensing enforcement activity is attached at Appendix E
- 1.5 Licence conditions developed by AGMA are available via the Council web site

#### 2.0 Licensing Act 2003 – Licence Conditions

- 2.1 Under the provisions of the Licensing Act 2003, premises require a licence for the sale/supply of alcohol, regulated entertainment and the provision of late night [hot] refreshment.
- 2.2 Conditions may be applied to licences in one of three ways:-
  - 2.3.1 Mandatory conditions relating to Designated Premises Supervisors, age classification of films and the use of door staff, bans on irresponsible drink promotions, the direct dispensing of alcohol, ID for those appearing to be under 18, provision of free tap water and small measure drinks. They are applied automatically to relevant licences.
  - 2.3.2 In preparing an application, the business operator should indicate the steps s/he intends to take to promote the licensing objectives. There are 4 licensing objectives defined with the Act:
    - The prevention of crime and disorder
    - Public safety
    - The prevention of public nuisance and
    - The protection of children from harm
       Any intended actions can be converted into licence conditions.
  - 2.3.3 Reviewing a licence to seek the imposition of conditions or by negotiation prior to a review.

#### 3.0 General premises management

- 3.1 Evidence from the Police and other responsible bodies should identify those problems linked to crime and disorder which can be improved through better management at licensed premises. The Police are now identifying a priority list of premises giving rise to most concern.
- 3.2 Solutions to identified problems will be developed to give a clear mutual understanding of what is required from licence holders.
- 3.3 Negotiation to seek improvements and mediation prior to any review will be a formalised process to minimise areas of dispute.
- 3.4 Where negotiation and mediation fail to bring about a mutual satisfactory conclusion the matter may go to a review hearing.
- 3.5 A pool of model conditions has been developed to ensure a consistent and proportionate response. They will be made available to licence holders generally and at an early stage of any negotiation. See Appendix F.
- 3.6 Failure to comply with conditions can lead to further reviews or prosecution.

#### 4.0 Enforcement

4.1 Any enforcement action will be in accordance with the Council's enforcement policy and Home Office guidelines.

#### **5.0 Developments**

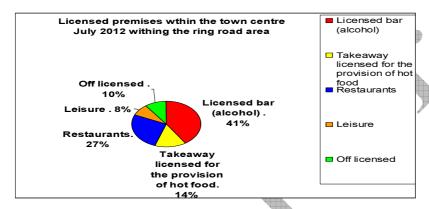
- 5.1 The Police and Social Responsibility Act 2011 has made a number of amendments to the Licensing Act 2003, of most significance to the town centre are Early Morning Restriction Orders (EMRO) and the Late Night Levy (LNL).
- 5.2 EMRO designed to address recurring problems with alcohol related crime and disorder in specific areas. They can be used to introduce a fixed closing time between midnight and 6.00 AM in areas where the Council considers that restricting the supply of alcohol is appropriate to promote the licensing objectives. They have to be evidence based and consideration of and development is subject to statutory protocols
- 5.3 LNL can be applied at any time between midnight and 6.00 AM and is designed to raise a contribution from late night opening alcohol retailers towards the costs of policing the late night economy. There is less flexibility than with EMROs; if applied it links to both the on and off trade and covers the whole Borough. Again they have to be evidence based and consideration of and development is subject to statutory protocols

## Appendix D Profile of licensed town centre premises

Licensed premises within the town centre as at July 2012
The times shown are the latest times available within the premise licence but they may not be applicable on every trading day. Detail of all current licences is available at

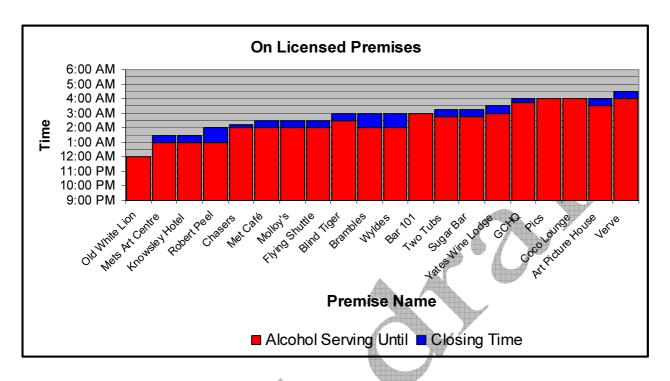
https://lpe.bury.gov.uk/protected/wca/publicRegisterLicActPremisesLevel1.jsp Within the ring road area:-

- 20 on licensed bar [alcohol] premises
- 7 takeaway type premises licensed for the provision of hot food
- 13 restaurants
- 4 leisure premises
- 5 off licensed premises



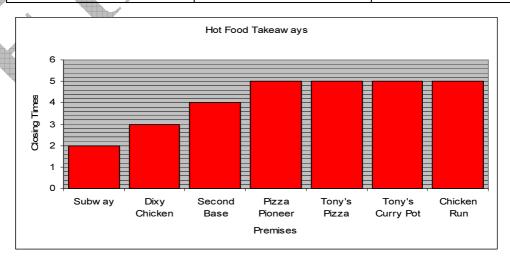
On licensed premises:-

Premises	Alcohol serving until	Closing time
Old White Lion	00.00 am	00.00 am
Mets Art Centre	01.00 am	01.30 am
Met Café	02.00 am	2.30 am
Knowsley Hotel	01.00 am	01.30 am
Robert Peel	01.00 am	02.00 am
Molloy's	02.00 am	02.30 am
Blind Tiger	02.30 am	03.00 am
Chasers	02.00 am	02.15 am
Brambles	02.00 am	03.00 am
GCHQ	03.45 am	04.00 am
Wyldes	02.00 am	03.00 am
Yates Wine Lodge	03.00 am	03.30 am
Pics	04.00 am	04.00 am
Coco Lounge	04.00 am	04.00 am
Art Picture House	03.30 am	04.00 am
Verve	04.00 am	04.30 am
Two Tubs	02.45 am	03.15 am
Flying Shuttle	02.00 am	02.30 am
Sugar Bar	02.45 am	03.15 am
101	03.00 am	03.00 am



#### Hot food takeaways:-

Premises	Closing time	Licensed for Alcohol
Subway	02.30 am	No
Dixy Chicken	03.00 am	No
Second Base	04.00 am	No
Pizza Pioneer	05.00 am	On & off sales until 02.00 am
Tony's Pizza	05.00 am	No
Tony's Curry Pot	05.00 am	No
Chicken Run	05.00 am	No



## Restaurants:-

Premises	Closing times		
Bella Italia	00.30 am		
Verona	01.00 am		
Wah Ying	00.00 am		
Jewel in the Crown	00.30 am		
Flaming Dragon	02.00 am		
Nandos	00.30 am		
Frankie & Bennys	02.00 am		
Barista Café Bar	02.00 am		
Pizza Express	02.00 am		
Emerson's	21.30 pm		
Ali Garh	01.00 am		
NY Deli	23.00 pm		
Leckenby's	19,30 pm		

## Leisure premises:-

AMF Bowling	02.30 am(Alcohol until 02.00 am)
Vue Cinema	24 Hr (Alcohol until 02.00 am)
Castle Leisure Centre	23.00 pm (no alcohol)
Bury Snooker Club	23.00 pm

## Miscellaneous:-

Marks & Spencer	02.00 am
Debenhams	23.00 pm
Town Crier	23.00 pm
Home Bargains	23.00 pm
Enodely Medeus (deli)	20.00 pm
Unit The Rock - currently unoccupied	02.00 am
Unit The Rock - currently unoccupied	02.00 am
Unit The Rock - currently unoccupied	02.00 am

# Appendix E Summary of certain aspects of licensing activity

- Reviews, expedited reviews are determined by Panel
- Closure Orders result from Police action
- Action plans are relevant to improving premises considered to be failing in good management principles.

Year	Reviews	Expedited Reviews	Closure Order	Premises subject to improvement Action Plans
				(new
				requirement)
2007	1		1	N/a
2008	3	1	A	N/a
2009		2		N/a
2010	2			N/a
2011	3	A	1	N/a
2012				di .

# Appendix F AGMA pool of model conditions

AGMA Licensing Managers' have developed a pool of model conditions which will be available for use as a reference tool for regulators, applicants and licence holders. It is not the intention to create a set of standard conditions for every licence. Selected conditions will be applied to licences where appropriate after consideration of individual circumstances. The model conditions are accessible via the Council web site

#### Appendix G

Proposed Action plan						
Action	Lead Officer	Timetable	Review	Comment		
Align town centre DPPO to Appendix 1						
Support and work with pub watch						
Establish a forum for responsible bodies						
Support and action planning for poor	Detail to be added when action plan agreed					
performing premises						
Use purple flag indicators						
Support the						
manager	introduction of a TC					
Seek purple flag accreditation						
Consider introduction of LNL and/ or EMRO						