

Application No:	Consultees Name:	Consultees Addr:	Received:	Comment:	Response:
2016/0697/P	People's Centre for Change	31 Gondar Gardens	16/03/2016 23:17:57	PETITNOBJE	<p>To: Planning Officer and Camden Council</p> <p>Dear planning officer and councillors I am asking Camden Council to cancel Planning Application 2016/0697/P and keep 96-98 Shoot up Hill as a community facility and not change the planning use to residential. Such change ignores the local Neighbourhood Development Plan which was passed at a referendum in July 2015. Furthermore, it would impact on the value of the property which would make it harder for People's Centre to eventually buy and continue to develop it as a much needed community resource for people with disabilities and the wider neighbourhood. The Design and Access statement fails to mention People's Centre for Change, a not for profit voluntary organisation also using the building, or to consider the impact of such a change on its membership and activities, current and future. The Design and Access statement also states that the current day centre provision will be re-provided in a Greenwood Place. I believe that the provision in the new centre will not be sufficient to support the current and growing numbers of people with high support needs and that it fails to properly assess the impact the lack of day centre/opportunities on this group, and that Camden fails its duties under the Care Act to provide for choice, market development and inclusion. (Signed by 424 people: see below)</p> <p>WHY IS IT IMPORTANT</p> <p>Why is this important?</p> <p>PEOPLE SAID "a community resource not luxury flats": after a petition, an Independent Inquiry and a local referendum (July 2015) 96-98 Shoot up Hill was listed as one of the community facilities to be protected from any change, in the Fortune Green and West Hampstead Neighbourhood Development Plan. (At the hearing Camden's Assistant Director of Adult Social Care and a planning officer presented Camden's arguments against listing of 96-98 Shoot up Hill as a community facility, with reference to Greenwood Centre. People's Centre for Change argued the case for listing as community facility and the need to recognise the nature and needs of the community in question, arguing that Greenwood Place would not constitute an adequate replacement. The Independent Examiner found in favour of listing the address as a community facility. In accordance with the Localism Act the plan was finally accepted after a democratic referendum in July 2015.)</p> <p>Both occupiers: the current day centre and People's Centre who run projects after day centre hours and weekends are recognised as communities (alive, developing and growing). But now the council is looking to reverse this decision changing the use to residential, in order to eventually sell it on the open market.</p> <p>THE IMPACT OF DAY CENTRE CLOSURES: The council wanted to close the day centre at Shoot up Hill in 2012. Day centre closures leave many people with learning disabilities even more isolated, stuck at home, without meaningful occupation, friendships lost, ever more dependent on their family carers. (see Mencap report "Stuck at Home").</p> <p>PERSONALISED (choice) BUT NOT ATOMISED (excluded): the council justified the closures saying that people wanted other choices than day centres and they should go out and about in the mainstream, using their personal budgets. (The council wanted to transform the day centre provision into a portable service, where people – many with high support needs – would be expected to access the wider community where little or no adaptations or suitable activities and support are provided.)</p> <p>Many people with learning disabilities are ready to embrace the changes in social care and to take control of their individual lifestyles using personal budgets to make choices. But the "community out there" does not yet provide the environments, activities and social opportunities they need and deserve</p>

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and which give them a sense of belonging.

Some people also need the continuity and familiarity of a vibrant and inclusive community where they are understood, fully accepted and welcomed and can choose from adapted and suitably challenging activities, and develop relationships with all sorts of people.

PEOPLE'S CENTRE = AN ALTERNATIVE: a group of people with learning disabilities, family carers and advocates campaigned against the closure and in April 2012 the council agreed to delay the closure and give them time to develop their proposals and raise money to buy the building. Cabinet also promised not to close or sell the building at 96-98 Shoot up Hill until the new Greenwood Centre was built. People's Centre was then set up as a not for profit organisation to fill in a gap in provision and offer an alternative to a traditional day centre, taking advantage of personalisation providing: excellent individually tailored choices of activities, learning opportunities, social and training/employment opportunities and support to people with a wide range of learning disabilities in a friendly, INCLUSIVE environment as well as new opportunities for the wider neighbourhood; modelling successful inclusion and supporting people to access other community venues.

NOT BACK TO INSTITUTIONS!: the council recognises the need for "building based" services but want to build a single, purpose built, large institutional facility (Greenwood Place) grouping people with all manner of impairments in discrete units: learning disabilities, mental health, dementia, autism, multiple and profound learning disabilities. People will be segregated according to what they cannot do (medical model), as well as set apart from the neighbourhood (in a back street, semi industrial area). Moreover Greenwood Place also lacks capacity to provide facilities for the current and growing numbers of people with high support needs. Extensive consultation results failed to record the many objections the various groups made to this project and associated day centre closures and EIAs failed to recognise important protected characteristics.

SMALL SCALE, INCLUSIVE, COMMUNITY RESOURCES, INSTEAD: People's Centre is developing a friendly and welcoming community place where people of all abilities and backgrounds complement each other, can get the support they need and engage in meaningful activities as well as go out to other places. We will model good practice.

BUILDINGS AT 96-98 Shoot up Hill ARE IDEAL: two semi detached houses which front a main road, look just like the neighbouring houses and allow for flexible use. They been adapted with accessible lift, WC facilities, changing room etc. There are no equivalent premises in the area and the cost of providing such facilities in another building will be prohibitive as well as wasteful. The building offers capacity to develop a growing inclusive community

People's Centre argued at a deputation to the council in January 2014 that the council would not need to sell the building at 96-98 Shoot up hill to develop the Greenwood Place, given the increase in property prices and asked the council to look at their business case again. The council have not provided new figures.

The building at Shoot up Hill which the council wanted to sell in September 2012 was valued, for the April cabinet meeting papers, together with the day centre building in Raglan Street, Kentish Town, at a combined £2.2million (assume £1.1million for business case for Greenwood). The money from sale of Shoot up Hill is linked to the building of Greenwood in Camden's CIP.

Camden have changed the original plan and have negotiated a deal with AA storage. A complete and transparent business case has not been made public.

WHAT PEOPLE'S CENTRE FOR CHANGE HAVE BEEN DOING, outside day centre hours and

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					<p>weekends:</p> <ul style="list-style-type: none"> - Weekly creative, learning, social and therapeutic sessions for adults and young people with learning disabilities. Open to everyone in the neighbourhood. Cafe - a “Unique Products” enterprise where people with and without disabilities work together. - weekly sessions and special events for unpaid carers in Camden - Saturday Stay and Play for families with children with disabilities, siblings and friends. - (soon) Weekend specialist yoga to families with a member with disabilities. - Open Days, Special Concerts, Carers Week Day, Carers Health Check Days and Community Festivals <p>VOLUNTEERS: from all backgrounds and abilities help make it happen</p> <p>FUNDERS: thank you to Co-op, National Lottery, School of Social Entrepreneurs, Comic Relief, Camden Carers Service, SIBS, a local Hampstead Trust, Bailly Thomas and individuals.</p> <p>SUSTAINABILITY: our business case demonstrates that we can be a sustainable enterprise, taking advantage of the changes in adult social care and combining this with provision of opportunities for the wider community and small businesses. We are continuing to develop the service offer and detailed business plan.</p> <p>CAPITAL FUNDING: People's Centre are working to raise capital to buy the building and keep it for the local community. This won't be possible if the building goes up for sale in the open market as a residential property.</p> <p>SUPPORT PEOPLE'S CENTRE PETITION and the opportunity to continue providing support for people with severe learning disabilities, their families and carers and creating an inclusive community resource for local people.</p>

Name Postcode people's centre W1T 6HE Paul Nicholson NW52QQ Maria Fernandez NW5 4QA ines ferreira NW52QQ Katie Byrne RH19 2AH Attila Tolga WC1X 8EH Esther Planas E2 8HN Ana Melo NW52QQ Em Kojic E17 6LT CRISTINA VITI NW10 0HY Bernadette HALE SG7 6JT Emily Legg N168RH adam hale SG7 6JT Hilary Franklin N11 1AB

Name Postcode Miguel Guedes NW52QQ Anna Sandfield NR9 3JH Ches Chesney NE65 7YJ Angela Pontes NW52QQ Sara Soares NW52QQ Neuza Pacheco NW52QQ Olga Pontes NW52QQ Ana Costa NW52QQ lisa Quinn NW1 0EA Jose Pacheco NW52QQ Ruthi Chesney BH21 RQ Harriet Lyall N16 8RH Nalan Bedding W1T 6HE Miranda Lennie NW13RP Hannah Gore N16 8RH Anne Lennie GL5 1LT Jordan Bedding NW1 3RP Eve Hersov NW3 1RT Stuart Lennie GL5 1LT Becky Green N17 8DX Satu Fox SE13 6UA natasha brown NW3 6AG isaac morgan SW9 7LU Andrea Castrogiovanni E9 5EG Lottie Markworth SW97LU Amy Fournier BS26 2EH Chris Legg TA7 0NX Victoria Angel NW1 9BS Robert Spigel NW6 1JT Nichols AllanInnes SP9 7BN Michael Pountney WC1N 3LX

Name Postcode Nicholas White N16 9BH William Lyall SE23 1JS sam osmond SW11 2LU Alice Donnell N16 7AA Cloe Sinden E97TA Hananah Whittle IG8 0EX Emma Murphy E5 9GU Erzsebet Almasi NW6 2EB Joshua Hughes NW6 3QN George Legg BS3 3NL Elliot Carpenter WC2B 5LR Fionn Duffy SE15 3HH Echo Collins-Egan W9 3DY james harris DA11 8AN Madeleine Oakley N2 0SY Colin Riley NW10 7HB Evangelia Roussou N6 5HL Michael Holloway SE1 0DG Hannah Ryan E5 0PP Alice Letman E50PP Ivo Belajic WC2H 9NP Paul Homer TN37 6JS Hannah Boulter NW5 3AB Ron Campbell BR60DQ Claire Roman SE41HX Nyla Davison SE12 8JJ PHU TO N19 5QA sophie krish NW103EQ Alison Legg TA7 0NX Makeda Krish N4 4HP Alistair Sproston NW10 3EQ

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					<p>Anna Ossowska N17 6DE</p> <p>Name Postcode Jacqueline Spigel NW6 1JT emma ferreira nicholson NW52QQ Martina Vavrova SE64TS Jeanette Bale TA6 7JP Jorge Freire N10 3 RP Natalie Bull DA1 5JZ Andrew Lodynski N11 2NT Mary Terrey E17 6HY Jean Willson N7 8BA Vivienne Rose N17 7HJ Melissa Pontes Da Costa Granja James Y Savill EN9 1HW Ann Walshq N195LH Lauren Russell LE100LA Mary Roseweir N11 1AU samantha Akita N1 0BY Antonio Melo NW52QQ Salome de Francisco SW9 6TY Netty Yasin E2 0NW Joanna Markworth KT19 9AB paul white EN88LT Andrew Walpole N16 0HA Mary Langan N8 9LG Isabel Crossman N167UX Louise Durrant N16 8RH Karen Short SG14 2EF Adam Dunnett TA126AZ Libbie Noakes SA626LN Pippa Atkinson E5 0PP Madeline Alterman E1W 3QZ Maggie Jones NW2 4NA</p> <p>Name Postcode David Auburn DA13 0AY I Nash NW51PP I AUBORN DA13 0SX Rita Ransford NW5 1XB MONIKA CARO NW3 5TD Sara Krish N44HP Iris Ben-David NW63RY Megan Herbert N11 2RJ Megan Herbert N11 2RJ Shila Khoshkbari SW15 6LE Susan Zur-Szpiro NW6 3EP Sorcha Floyd TA70JF Mikolaj Blaszkiewicz NW9 7QW Amanda Ryan E9 5HP linda edwards HA87FD Minnan Al-Khafaji NW6 7BH Pernell Adams N13 6JH Linda Sluys NW6 1NZ Harriet Farmer BN10 7SW Hazel Gilcreest N80AB Natalie Pink N1 0HF Lauren Hoskin BS3 3NY Georgina Mathiason N13 4LN Sallie Harris TA12 6BB Anne Tickell N19 5BG Lesley Hall IG11 0UH Michael Stuart NW6 7QP Rob Newby NN17 3DL jan martin BS6 5ND Jasmine Fulcher UB5 5UE E Strover N10 1HU</p> <p>Name Postcode Mardi Shakti N1 1EE Heather Morgan S71SD James Earl NW2 3NP john thompson N3 1LG wayne stalley NW6 1HY Joel O'Donoghue BN7 3NB Ryan Cox NW6 1LU mila griebel NW6 2PX Desiree Kumpf SE145PW Clare Palmer N5 1DP Sue Shickle E11 4BS Elizabeth Maloney N16 7AA Keith Moffitt NW6 1AJ Rebecca Duncan NW2 3RT Elinor Harbridge TA24 6SS Leila Zebiri E9 7JJ Christine Cox NW2 3RT jenny benham NW2 3RT Michael Amess NW22RG Elaine Taylor NW3 2YA Barbara Lazaro N1 2EX Amanda Jane NW3 2YY Stella MascarenhasKeyes S117GH Jas o NW2 3RT Caitlin Smith WC2B 5LR Sallianne Brown N3 1NJ philippa russell N6 6JJ Rory Morgan N4 4DA Ariane Sacco NW6 7NH Hanna Sakki SE17 3HT Maria Vale NW52QQ</p> <p>Name Postcode Anna wakeford N8 8QX Dominic de Vere SW20 0LW Joseph Curran EX37 9DA Mary Heagney IG39UF Nick Jackson NW2 3SL Felicity Baldwin CV5 6GH ruth knox N89RY Abigail Legg TA70NX therru seamer NW2 3XH louis terras NW61EP Ray Leslie ELSON N8 0BE martine SOUAN N8 0BE Jessica Kempner NW2 3RT ann fla nagan NW6 2 BA betty wang N227TQ Basia Grzybowska N8 0BE Robin Lomas N22 5NA Anne C. NW1 0XA Jane Connor E17 7DE sofia abayazied NW6 5HY Peter Godfrey EN2 8NY Nadia Al Faghhih Hasan N4 3QP Rosie Earl NW6 3DG Charlotte Pitt E5 0DY Agnès Baetens BN1 6GE Linda Dawson N17 9AE Catherine Fulcher UB5 5UE VICTORIA EVES WC1E 7HG Paul Durrant E17 6HY Nicole Specker NW3 7XF Andrew Dowell NW1 9LT</p> <p>Name Postcode Galatea Kamenova NW5 4AT Denis Pougin SE15 2 UJ Zoe Miles N15 3ST Inbar Tamari E179JW Chris Stevens BN1 3FT Joseph Eaton TA70NX Maria Kokolaki N22 6 RT Annette Meaney BN1 7BE Christina Purcell M21 9EY John Wells IV63 6UR bEN Sharp NW6 1AQ Daniel Church CB5 8DR Amy Haydenwason N15 6NB Ian Yarham DA16 3NF Dounia Messaoudo CB4 3SR Demi Kennedy B33 9RE Monica Rivers N9 8LW Bev Isherwood HG4 1JA Michael Garrad SE24 9NZ Anthony Shubbrook NW6 1QH Fraser B NW2 0PQ Stefani Crone WC1N 3AL Babita Mundra NG5 4DH Oli Arlotto N155EP T Gray N6 4BJ Mike Rowlands E1 5EJ Ian Kill UB10 0ED pam yuille N6 6BL christine godwin W4 4AH Radhika Arlotto N155ED</p>

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					<p>Deakin SW2 4BJ Sara Hassan EN3 5BA Ajay k NW6 4NA Friends Kilburn Grange Park NW62JH Graham Spragg HP13 5TP Deepa Patel E4 6ST Helena Paul NW61TS Saar Shai N10 1PU Monique Lauder HA5 4 PR Leo Capella CB10 1EJ jess ankrah NW6 2JR KIERAN BRADLEY NW23UE Gabriella O'Neill RM66JR Homa Atib NW6 2QR alicia zur-szpiro N101PU kingsgatewatch neighbourhood watch NW64NA Eliana Zur-Szpiro NW5 4BA Katy Tomlin E2 7QL Snezana B NW6 2NP sarrin kanemitsu NW62NP Tomoyo Miyakawa N4 2JX Julia Tint NW6 2NP tracylena morgan NW62NP Rukhsana C NW6 2NP Maria Ferreira NW5 2QQ Tom Tickell N195BG James Connelly SG180LS Bobby Buckley HA1 3GJ</p> <p>Name Postcode Leah Barnett N70RE Elliot Hiller N12 8QF Elizabeth Pinn CT21 6BJ Rose Trezise NW32JE Fuad Hussain NW2 3NH Jennie Dobson CV37 9UN Mick McAloon HA5 3UZ David Nathan EN5 2ER richard horne EN2 8NY Amanda HorobinWorley BR1 3SL Edwina Benjamin WD25 8AB Edet Amana NW2 3U Emma-Louise Goodchild RM3 8BH Erica Marks WD6 4QU Stacy Hackner NW3 2LN peter symonds NW6 3EB Madeline Ioannidis NW11 7HF Neil Fletcher NW6 1TH Stella Tysall NW6 1AA Marian Rose NW6 6HA fiona campbell NW6 2EB Sara Dibb NW6 1TY Peter Croft NW6 1SH Kristyan Robinson NW2 3SL Barbara Anning NW6 1SJ Janet Crawford NW6 2PT Edith Raff NW3 6HT Rebecca Dickinson NW62EE Tracey Shackle NW6 2BE Guy Shackle NW6 2BEN Name Postcode Katie Dibb NW61TY Gillian Robertson NW6 1PS David Lewis NW2 3RN Tom Young NW5 4PG Abby Sullivan W9 1NH Michael Keating NW6 1NR Roger Murray NW6 3DY Nancy Jirira NW2 3SN Oscar Leyens W2 2LY and others</p>

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2016/0697/P	Bridget Dunne	18c Lymington Road West Hampstead NW6 1HY	16/03/2016 21:12:38	OBJNOT	<p>STOP THE LOSS OF A VIBRANT, INCLUSIVE COMMUNITY RESOURCE AT 96-98 SHOOT UP HILL, NW2</p> <p>TO: PLANNING OFFICER AND CAMDEN COUNCIL</p> <p>Dear planning officer and councillors</p> <p>I am asking Camden Council to cancel Planning Application 2016/0697/P and keep 96-98 Shoot up Hill as a community facility and not change the planning use to residential. Such change ignores the local Neighbourhood Development Plan which was passed at a referendum in July 2015. Furthermore, it would impact on the value of the property which would make it harder for People's Centre to eventually buy and continue to develop it as a much needed community resource for people with disabilities and the wider neighbourhood.</p> <p>The Design and Access statement fails to mention People's Centre for Change, a not for profit voluntary organisation also using the building, or to consider the impact of such a change on its membership and activities, current and future.</p> <p>The Design and Access statement also states that the current day centre provision will be re-provided in a Greenwood Place. I believe that the provision in the new centre will not be sufficient to support the current and growing numbers of people with high support needs and that it fails to properly assess the impact the lack of day centre/opportunities on this group, and that Camden fails its duties under the Care Act to provide for choice, market development and inclusion.</p> <p>Why is this important?</p> <p>PEOPLE SAID "a community resource not luxury flats": after a petition, an Independent Inquiry and a local referendum (July 2015) 96-98 Shoot up Hill was listed as one of the community facilities to be protected from any change, in the Fortune Green and West Hampstead Neighbourhood Development Plan. Both occupiers: the current day centre and People's Centre who run projects after day centre hours and weekends are recognised as communities (alive, developing and growing). But now the council is looking to reverse this decision changing the use to residential, in order to eventually sell it on the open market.</p> <p>THE IMPACT OF DAY CENTRE CLOSURES: The council wanted to close the day centre at Shoot up Hill in 2012. Day centre closures leave many people with learning disabilities even more isolated, stuck at home, without meaningful occupation, friendships lost, ever more dependent on their family carers. (see Mencap report "Stuck at Home").</p> <p>PERSONALISED (choice) BUT NOT ATOMISED (excluded): the council justified the closures saying that people wanted other choices than day centres and they should go out and about in the mainstream, using their personal budgets. Many people with learning disabilities are ready to embrace the changes in social care and to take control of their individual lifestyles using personal budgets to</p>

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make choices. But the “community out there” does not yet provide the environments, activities and social opportunities they need and deserve and which give them a sense of belonging. Some people also need the continuity and familiarity of a vibrant and inclusive community where they are understood, fully accepted and welcomed and can choose from adapted and suitably challenging activities, and develop relationships with all sorts of people.

PEOPLE'S CENTRE = AN ALTERNATIVE: a group of family carers campaigned against the closure and in April 2012 the council agreed to delay the closure and give them time to develop their proposals and raise money to buy the building. People's Centre was then set up as a not for profit organisation to fill in a gap in provision and offer an alternative to a traditional day centre, taking advantage of personalisation: excellent individually tailored choices of activities, social and employment opportunities and support to people with a wide range of learning disabilities in a friendly, INCLUSIVE environment as well as new opportunities for the wider neighbourhood; modelling successful inclusion and supporting people to access other community venues.

NOT BACK TO INSTITUTIONS!: the council recognises the need for “building based” services but want to build a single, purpose built, large institutional facility (Greenwood Place) grouping people with all manner of impairments in discrete units: learning disabilities, mental health, dementia, autism, multiple and profound learning disabilities. People will be segregated according to what they cannot do, as well as set apart from the neighbourhood (in a back street, semi industrial area). Moreover Greenwood Place also lacks capacity to provide facilities for the current and growing numbers of people with high support needs.

SMALL SCALE, INCLUSIVE, COMMUNITY RESOURCES, INSTEAD: People's Centre is developing a friendly and welcoming community place where people of all abilities and backgrounds complement each other, can get the support they need and engage in meaningful activities as well as go out to other places. We will model good practice.

BUILDINGS AT 96-98 Shoot up Hill ARE IDEAL: two semi detached houses which front a main road, look just like the neighbouring houses and allow for flexible use. They been adapted with accessible lift, WC facilities, changing room etc. There are no equivalent premises in the area and the cost of providing such facilities in another building will be prohibitive as well as wasteful.

WHAT WE ARE DOING NOW, outside day centre hours and weekends:

- Weekly creative, social and therapeutic sessions for adults and young people with learning disabilities supported by volunteers, family and support workers. Open to everyone in the neighbourhood. Cafe with freshly cooked delicious food.
- a “Unique Products” enterprise where people with and without disabilities work together.
- weekly sessions and special events for unpaid carers in Camden
- Saturday Stay and Play for families with children with disabilities, siblings and friends.
- (soon) Weekend specialist yoga to families with a member with disabilities.
- Open Days, Special Concerts, Carers Week Day and Community Festivals bringing together people of all ages, backgrounds and abilities to make music, art and enjoy life.

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					<p>VOLUNTEERS: from all backgrounds and abilities help make it happen</p> <p>FUNDING: we have received funding from Co-op, National Lottery, School of Social Entrepreneurs, Comic Relief, Camden Carers Service, SIBS, a local Hampstead Trust, Baily Thomas and individuals.</p> <p>SUSTAINABILITY: our business case demonstrates that we can be a sustainable enterprise, taking advantage of the changes in adult social care which give people with support needs the means to decide on the services they want and combining this with provision of opportunities for the wider community and small businesses. We are continuing to develop the service offer and detailed business plan.</p> <p>CAPITAL FUNDING: People's Centre are working to raise capital to buy the building and keep it for the local community. This won't be possible if the building goes up for sale in the open market as a residential property.</p>
2016/0697/P	Joseph Black	18 Lymington Road	16/03/2016 23:46:27	OBJNOT	<p>I strongly object to this planning application for 96-98 Shoot Up Hill, the buildings which house the People's Centre for Change and the community that has built up around it, and recommend that the application be refused and rejected out of hand.</p> <p>The small number of stated residential units to be acquired through the proposed change of use is a long way removed from sufficient justification to consider destroying this well-established, well-used, much-loved community asset. The services provided by the People's Centre for Change enrich and improve the lives of exponentially more people than would six additional housing units. The People's Centre for Change has ensured that the buildings have been fully adapted to meet the needs of its service users and so the spaces are ideally suited to the purposes for which they are used.</p> <p>The true value of the buildings are in its existing D1 incarnation and in its occupants and the sum total of the real value of those factors is far in excess than that of any arbitrary property value. Furthermore this value is provided to a great and growing number of people with support needs for whom needs are better met locally and in familiar surroundings than, for example, in some geographically remote alternative proposed by the council. That the People's Centre for Change has continued to grow and thrive over the years and has built a large community around its service provision is testament to its true value on which a price in pounds sterling cannot be put.</p> <p>The building and facilities are "widely used, appreciated" and "support the community's needs" and should be "supported and their site protected" under policy E7 Public and Community Facilities of the Neighbourhood Development Plan, notwithstanding the NDP's inbuilt get-out clause which states, "unless a replacement facility is provided". As outlined above, a geographically remote alternative would destroy the existing services and community and simultaneously would fail to meet the needs of its many vulnerable service users.</p>