

Item: 8

Education, Leisure and Housing Committee: 8 February 2023.

Proposed Facility Development.

Report by Corporate Director for Education, Leisure and Housing.

1. Purpose of Report

To consider a Stage 1 Capital Project Appraisal in respect of a covered synthetic training pitch, including a separate specific gymnastics hall.

2. Recommendations

The Committee is invited to note:

2.1.

That, on 16 February 2022, when considering the development of a covered synthetic training pitch and interconnected gymnastics hall, the Education, Leisure and Housing Committee recommended that the Executive Director of Education, Leisure and Housing should continue to progress the proposal to develop a covered synthetic training pitch suitable for rugby, football and other sports, interconnecting to a separate gymnastics hall, through the Capital Project Appraisal process.

2.2.

The stage 2 feasibility report, attached as Appendix 1 to this report, prepared by Paragon Structures Limited, in respect of the proposed facility, which focuses on three potential sites, two of which are on the grounds of Kirkwall Grammar School, the other on the Pickaquoy Centre Trust estate.

2.3.

The estimated cost range for the proposed facility, provided by Paragon Structures Limited, of between £4,798,000 and £4,873,000, which predominately relates to the main structure only.

2.4.

The estimated construction cost for the proposed facility, of between £9,101,539 and £9,344,499, including allowance for design, construction and inflationary risks and an assumption that construction will commence in 2023.

2.5.

The Stage 1 Capital Project Appraisal, in respect of the proposed covered training pitch and gymnastics facility, attached as Appendix 1 to this report, with the

recommendation that the facility be sited on the grounds of Kirkwall Grammar School.

It is recommended:

2.6.

That, as an exception to the Capital Project Appraisal process, given the limited time available prior to the 2025 International Islands Games, the Corporate Director for Education, Leisure and Housing should submit, to the Policy and Resources Committee, a Stage 2 Capital Project Appraisal in respect of the proposed covered training pitch and gymnastics facility, to be sited on the grounds of Kirkwall Grammar School.

2.7.

That the cost of developing the Stage 2 Capital Project Appraisal, estimated at £30,000, be funded with an allocation from the Capital Project Appraisal Fund.

3. Introduction

3.1.

On 16 February 2022, when considering the development of a covered synthetic training pitch and interconnected gymnastics hall, the Education, Leisure and Housing Committee noted:

- That, on 13 September 2017, the Education, Leisure and Housing Committee recommended approval of the Orkney Islands Sports Facilities Strategy, incorporating the Playing Pitch Strategy, the Built Facility Strategy and Executive Summary, in so far as it related to the remit of the Council and with recognition of the limitation of current resources.
- That the Orkney Islands Sports Facilities Strategy, referred to above, identified a number of built facility recommendations including:
 - Work with other relevant local, regional and national partners to develop a purpose-built gymnastics provision, or secondary hall at the Pickaquoy Centre which could be used predominately for gymnastics.
 - Increase the provision of 3G artificial grass pitch provision across Orkney with the development of a full-size pitch suitable for competitive rugby and football.
- The proposal to develop a covered synthetic training pitch suitable for rugby, football and other sports, interconnecting to a separate gymnastics hall, at an estimated construction cost of £3 million.
- The limited capacity at Kirkwall Grammar School and the Pickaquoy Centre, especially during the winter months, to offer indoor space which resulted in waiting lists for a number of events/clubs.
- That sportscotland had worked with the Council to engage with sports and communities within Orkney with regard to facility requirements.

- That sportscotland had indicated a willingness to move away from its previous application-based funding model for facility investment to a more strategic approach with the Council.
- That sportscotland had indicated a minimum capital investment of £500,000 towards the project to develop a covered synthetic training pitch and interconnecting gymnastics hall.
- That Scottish Government officials tasked with delivering the National Islands Plan had indicated a maximum capital investment of £500,000 towards the project to develop a covered synthetic training pitch and interconnecting gymnastics hall, however, there was potential for the project to attract further funding from the Scottish Government.
- That, although the proposed facility would support staging of the 2025 International Island Games, its impact to the community would be felt well beyond the 2025 Games by sustaining such sport into the future.

3.2.

The Committee recommended that the Executive Director of Education, Leisure and Housing should continue to progress the proposal to develop a covered synthetic training pitch suitable for rugby, football and other sports, interconnecting to a separate gymnastics hall, through the Capital Project Appraisal process.

4. Background

4.1.

Sport and leisure activities have always and will continue to play a significant part in Orkney life, with high participation rates across a wide range of sports and activities.

4.2.

Orkney is also exposed to long dark winters that hinder the development of outdoor sports with a specific impact on football. Weather and ground conditions also limit outdoor contact training opportunities for rugby and create a less than appealing environment for mini rugby.

4.3.

As Orkney continues to recover from the COVID-19 pandemic health and well-being is a key focus both locally and nationally and the provision of quality sport and leisure facilities in Orkney will play a key role in supporting that focus.

4.4.

There is limited capacity at Kirkwall Grammar School and the Pickaquoy Centre, especially during the winter months, to offer indoor space for training and activity, which results in waiting lists and reduced training opportunities.

4.5.

In 2017 Orkney Islands Council completed a Pitch and Facility Strategy which was approved in May 2017.

4.6.

Orkney Islands Council and **sportscotland** have had a strategic partnership since 2004, with **sportscotland** investing in and contributing to a range of facility development projects, sports development, people development and athlete development programmes over that period, as well as providing on-going support to Orkney's Active Schools and Community Sports Hub programmes.

4.7.

Discussions between Council officers and **sportscotland** have indicated a willingness from **sportscotland** to move away from its previous application-based funding model for facility investment, to one where a more strategic approach is adopted with Orkney Islands Council, with a real focus on developing facilities aimed at significantly improving the quality of life of people and communities in Orkney.

4.8.

Sportscotland have agreed a minimum funding allocation of £500,000 towards a project as detailed in 7.1 if approved.

4.9.

The emergence of the National Islands Plan and a specific outcome that *“Islanders of all ages understand the benefits of being physically active by planning and developing sports facilities that islanders need and to encourage islanders to use and enjoy these facilities,”* has led to positive conversations with the Scottish Government and a commitment of funding towards this project.

4.10.

The Scottish Government's National Islands Plan team have agreed to allocate a maximum of £500,000 towards a project as detailed in 7.1 if approved.

There are other opportunities for the Council to secure additional external funding from organisations such as the Scottish Football Association and the Scottish Rugby Union towards the development of a facility such as that being proposed.

4.11.

The Education, Leisure and Housing service has identified the development of a covered sports facility and gymnastics hall as one of its top priorities within the future capital programme.

5. Orkney Gymnastics

5.1.

Orkney Gymnastics Club was formed in 2017 and used to operate from the Pickaquoy Centre, however, in order to grow and introduce new disciplines the club moved to rented facilities in 2020.

5.2.

Orkney Gymnastics Club have indicated its' current facility is already restrictive in terms of providing additional training hours and increasing athlete numbers resulting in it having 185 people waiting to join, resulting in young people waiting over a year to get an opportunity to be part of the sport.

5.3.

Currently there are 272 people covering an age range of 18 months – 17 years old regularly attending gymnastic classes:

- 75 x pre-school (18 months to 5 years old).
- 93 x recreational (5 – 16 year olds).
- 34 x Development Groups.
- 70 x squads split in to:
 - 6 x mini development squad.
 - 17 x mini two-piece squad.
 - 12 x mini 4-piece squad.
 - 19 x senior two-piece squad.
 - 9 x senior four-piece squad.
 - 7 x elite squad.

5.4.

In addition to its focus on the 2025 International Island Games, the Orkney Gymnastics Club wish to increase the number of classes it offers while providing outreach programmes for communities on Orkney's outer isles, working more with people with additional support needs and developing closer links with schools.

5.5.

Having a purpose-built facility which would allow the Orkney Gymnastics club to grow for the future and beyond has always been the clubs ultimate goal.

6. 2025 International Island Games Gymnastics

6.1.

Gymnastics is one of the 13 sports that participants will compete in at the 2025 International Island Games.

6.2.

In order that the sport of gymnastics continues to grow in Orkney and that Orkney's gymnastics team can compete for medals at the 2025 International Island Games in Orkney there is a need for a facility where the necessary apparatus can be located, providing unlimited access leading up to, during and beyond the Games.

6.3.

The estimated cost to rent the gymnastics equipment necessary for delivery of gymnastics at the 2025 International Island Games is £50,000, with a purchase price of £100,000. The purchase of equipment would require a facility to locate it leading up to and beyond the 2025 games.

6.4.

For a gymnastics facility to have any impact on Orkney's gymnastics athletes' performances at the 2025 International Island Games, it is suggested it would have to be operational by the summer of 2024.

6.5.

Beyond the hosting of the International Island Games, the proposed new facility would have a significant, wider and longer-term positive impact towards increasing participation in physical activity and sport for all of Orkneys communities.

7. Proposed Facility Development

7.1.

It is proposed to develop a covered 48.8m x 94.4m training facility suitable for rugby and football and a range of other sports, including a space for a specific gymnastics hall, enhancing Orkney's existing suite of facilities allowing it to host more regional and national competitions and events, with a specific focus on gymnastics.

7.2.

To assist with the production of the Stage 1 Capital Process, Paragon Structures Limited have provided a stage 2 feasibility report, attached as Appendix 1 to this report, for a facility as detailed in section 7.1 above, which focuses on three potential sites, two of which are on the grounds of Kirkwall Grammar School, the other on the Pickaquoy Centre Trust estate.

7.3.

The estimated cost range for the facility provided by Paragon Structures is between £4,798,000 and £4,873,000, however, this predominately relates to the main structure, and there are a number of items such as substructure, fixtures, fittings and sports flooring that have been not included in their estimate.

7.4.

Officers from Neighbourhood Services and Infrastructure have reviewed and where necessary adjusted the cost estimate range to between £9,101,539 and £9,344,499, within which allowances have been made for design, construction, inflationary risks, Orkney market conditions and an assumption that construction will commence in 2023.

7.5.

A summary of the pros and cons for each site as well as Paragon cost comparisons are provided in Appendix 1.

7.6.

Based on the proposed facility footprint of 4,607 square metres and estimated weekly usage of 40 hours for 43 weeks of the year, it is estimated that annual utility costs would be £65,411.

7.7.

If constructed, the proposed facility would be included in the respective values of either Kirkwall Grammar School or the Pickaquoy Centre in terms of each site's rateable value and therefore would increase either site's rateable value as follows:

- Kirkwall Grammar School – current rateable value £439,112 to £520,332, an increase of £81,220.
- The Pickaquoy Centre – current rateable value £484,700 to £641,900, an increase of £157,200.

7.8.

It has been indicated that if a facility such as the one proposed was to be constructed at either Kirkwall Grammar School or the Pickaquoy Centre, it would be entitled to the improvement relief, therefore, payment of rates would only start in year 2 following completion.

7.9.

A Stage 1 Capital Project Appraisal for the proposed covered training pitch and gymnastics facility is attached as Appendix 2 to this report. Option B3, as detailed in the options appraisal, is recommended as the preferred location for the proposed facility. The reason for selecting this location is predominately financial as it results in an estimated rates saving of £75,980 when compared to option C.

8. Links to Council Plan

8.1.

The proposals in this report support and contribute to improved outcomes for communities as outlined in the Local Outcomes Improvement Plan priority of Quality of Life.

8.2.

The proposals in this report relate directly to Priority 5.17 We will work towards implementing the recommendations of the Sports Strategy of the Council Delivery Plan.

9. Links to Local Outcomes Improvement Plan

The proposals in this report support and contribute to improved outcomes for communities as outlined in the Local Outcomes Improvement Plan priority of Community Wellbeing.

10. Financial Implications

10.1.

It is notable that the Capital Project Appraisal process operates in normal circumstances on an annual cycle which allows for competing priorities to be assessed both at service and corporate level. That said, nothing should prohibit the Council from exercising its discretion to initiate projects where exceptional circumstances apply.

10.2.

A report on the capital priorities across the Council will be presented to members in 2023, which will allow them to consider which projects should progress to Stage 2 Capital Project Appraisal stage, based on the available headroom within the Loan Charges budget.

10.3.

The covered sports facility is one of the top three priorities for Education, Leisure and Housing along with the Additional Support Needs Centre, and an Orkney Collection Centre for the Museums Service.

10.4.

The Stage 1 Capital Project Appraisal, attached as Appendix 2 to the report, estimates a total capital cost for the construction of the covered sports facility in the range of £9,101,539 and £9,344,499.

10.5.

Sportscotland has indicated a minimum capital expenditure of £500,000 towards the development of a facility of the type detailed in Appendix 1.

10.6.

The Scottish Government's National Islands Plan has identified a maximum of £500,000 towards the development of a facility of the type detailed in Appendix 1.

10.7.

Further external funding contributions may be available which could be used to support the project.

10.8.

The current estimated cost to the Council for this project is in the region of £8,300,000 which would require to be borrowed from the Loans Fund and repaid over the life of the asset.

10.9.

If the project is approved for progression, the Stage 2 Capital Project Appraisal will require to quantify the anticipated ongoing revenue costs associated with this project such as utilities and rates, which are shown at sections 7.6 and 7.7 above, plus insurance, maintenance, cleaning and any additional staff resource required for this facility. These additional costs would be offset by income generated, however, the net increase in revenue budget requirements do need to be considered in the appraisal process.

10.10.

An estimated cost to carry out the work required to move this project to Stage 2 of the Capital Project Appraisal process is detailed in Appendix 2 as £30,000.

10.11.

The funding required to develop this project to a Stage 2 Capital Project can be allocated from the annual allocation for project appraisal works which has been set aside from the finance and loan charges budget for General Fund services.

11. Legal Aspects

11.1.

Kirkwall Grammar School estate is owned by the Council so if the facility is built there, there are no ownership issues.

11.2.

The Pickaquoy estate is owned by the Council but leased to the Pickaquoy Centre Trust. Therefore, if the facility was built there, consent of the Trust would be required.

11.3.

If built on the Pickaquoy estate there may be a requirement for a management agreement, similar to the one which is in place for the lifestyle project arrangement. The purpose of this would be to determine matters such as occupancy, permitted use, upkeep, maintenance and equipment.

11.4.

In terms of the Local Government and Planning (Scotland) Act 1982, section 14, the Council shall ensure that there is adequate provision of facilities for the inhabitants of their area for recreational, sporting, cultural and social activities.

11.5.

In terms of the Local Government and Planning (Scotland) Act 1982, section 15(2), the Council may provide or do or arrange for the provision of or doing of, or contribute towards the expenses of providing or doing, anything necessary or expedient for the purpose of ensuring that there are available, whether inside or outside their area, such facilities for recreational, sporting, cultural or social activities as they consider appropriate.

11.6.

Under Section 50A(4) of the Local Government (Scotland) Act 1973, the public should be excluded from the meeting in respect of any discussion relating to Appendix 1. Appendix 1 contains exempt information as defined in paragraphs 6, 8 and 9 of Part 1 of Schedule 7A of the Act.

12. Contact Officers

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13. Appendices

Appendix 1: Feasibility study.

Appendix 2: Stage 1 Capital Project Appraisal.

ORKNEY ISLANDS COUNCIL - CAPITAL PROJECT APPRAISAL PROCESS

Project Appraisal – Stage 1

Capital Programme: General Fund

Client Service: Education, Leisure and Housing Service

Project Name: Covered Training Pitch and Gymnastics Facility

1. Background

Sport has always and continues to play a significant part in Orkney life, with high participation rates across a wide range of sports and activities.

As we continue to recover from the COVID-19 pandemic it is noted that the health and well-being of our population is a key focus both locally and nationally and the provision of quality infrastructure of sport and leisure facilities in Orkney will play a key role in supporting that focus.

In 2017 Orkney Islands Council completed a Pitch & Facility Strategy which was approved, and together with Orkney being awarded the International Island Games in 2025 has led to continued dialogue with **sportscotland** to explore opportunities for capital development that will support the delivery of the games. This project will ensure that the Games has a lasting impact on the Orkney community through enhanced provision of facilities.

The Council approved Orkney Pitch and Facility Strategy, identified a number of built facility recommendations including:

- Work with other relevant local, regional and national partners to develop a purpose built gymnastics provision, or secondary hall at the Pickaquoy Centre which can be used predominately for gymnastics; and
- Increase the provision of 3G artificial grass pitch provision across Orkney with the development of a full size pitch suitable for competitive rugby and football.

Orkney Islands Council and **sportscotland** have had a strategic partnership since 2004, with **sportscotland** contributing to a range of facility development projects, sports development, people development and athlete development programs over that period, as well as providing significant on-going financial support to Orkney's Active Schools and Community Sports Hub programs.

During discussions between Council officers and **sportscotland**, **sportscotland** has indicated a willingness to move away from its previous application-based funding model for facility investment to one where a more strategic approach is adopted with Orkney Islands Council, with a real focus on developing facilities aimed at significantly improving the quality of life of people and communities in Orkney.

Orkney has existing high quality built facilities and a natural environment that serve the communities of Orkney well and promote and encourage activity at all levels and ages. Orkney's population is however forecasted to grow slightly up until 2037, so there is a need to ensure sufficient provision of accessible, quality and affordable facilities to meet local need.

Orkney is exposed to long dark winters that hinder the development of outdoor sports with a specific impact on football. Weather and ground conditions also limit outdoor contact training opportunities for rugby and creating a less than appealing environment for mini rugby as well as the grassroots development of a number of other sports.

sportscotland has worked with the Council's Community Sport Hub Officer to engage with sports and communities within Orkney with regards to requirements in terms of staging the International Island Games and facilities that could have a significant ongoing impact on sports performance and activity levels in Orkney.

2. Appraisal

	Option A.	Option B3.	Option C.	Separate Football and Gym Facilities.
Summary.	Kirkwall Grammar School Site. Both facilities together to form one 48.8m x 96.5m structure on the main sports pitch.	Kirkwall Grammar School Site. Both facilities together to form one 48.8m x 96.5m structure on the East playing fields.	Pickaquoy Leisure Centre. Both facilities together to form one 48.8m x 96.5m structure at rear of site.	Location TBC. Football and Rugby: 48.8m x 76.2m. Gymnastics: 24.4m x 43.9m or: 24.4m x 45.6m or: 27.4m x 41.1m.
Pros.	Accommodation - changing/toilets/seating could be shared between 2 functions. Viewing gallery to both facilities on mezzanine deck.	Accommodation - changing/toilets/seating could be shared between 2 functions. Viewing gallery to both facilities on mezzanine deck. Avoids existing below ground services. Lesser planning risk than building next to St, Thomas Street.	Accommodation - changing/toilets/seating could be shared between 2 functions. Viewing gallery to both facilities on mezzanine deck. Potentially less planning risk with no. of adjacent neighbours.	Minimises planning risk with reduced overall massing compared with combined options.
Cons.	Planning risk - overall mass of building adjacent to Thomas Street.	Access across existing car park.	New facilities relatively far away from main building.	24.4m gymnastics facility would require additional height

	Option A.	Option B3.	Option C.	Separate Football and Gym Facilities.
	Depends on structural foundation design not affecting existing ground source heat network.	Takes out running track, limiting summer sports activities.	May need WCs and changing within football / rugby facility due to distance from main Building.	through leg extensions and/or dwarf wall to achieve 8m headroom. Possible additional prelims/cost/ programme implications of construction two buildings instead of one.
Estimated Total Build Cost.	£9,344,499. £1019 per sqm.	£9,101,539. £1019 per sqm.	£9,101,539. £1019 per sqm.	£1013 per sqm.
Estimated Build Time.	25 weeks.	25 weeks.	25 weeks.	Gymnastics Centre - 16 weeks. Football/Rugby Centre - 16 weeks.
Estimated Rateable Value.	£81,220.	£81,220.	£157,200.	-

3. Financial Implications

	Total	2023/24	2024/25	2026/27	2027/28
	£000	£000	£000	£000	£000
Capital Expenditure	9,300	3,000	6,300		
Less: Anticipated Grants or Other Contributions	1,000	500	500		
Net Capital Expenditure	8,200	2,500	5,800		
Associated Revenue Implications			35	65	147
Associated Finance and Loan Charges					
Estimated cost of detailed Stage 2 CPA		30			

The funding required to develop this project to a Stage 2 Capital Project Appraisal can be allocated from the annual allocation for project appraisal works which has been set aside from the finance and loan charges budget for General Fund services.

4. Policy Aspects

This proposal supports and contributes to improved outcomes for communities as outlined in the Council Plan priority of Quality of Life, as well as Strategic Objective 7 of the National Island Plan – Support relevant local authorities to plan and develop sports facilities on islands that respond to the needs of communities & Work with Orkney Islands Council and other partners to use the hosting of the 2025 Island Games by Orkney to strengthen sports development on the island.

The proposal relates directly to Priority 5.17 of the Council Delivery Plan – We will work towards implementing the recommendations of the Sports Strategy and 5.10 – work with Partners to support Orkney’s hosting of the 2025 Island Games.

This proposal supports 1 of the Scottish Football Association’s objectives within its 2022 – 2025 Grassroots Football Strategy – Improve access to quality community football spaces.

5. Statutory Responsibility

In terms of section 14 of the Local Government and Planning (Scotland) Act 1982 the Council shall ensure there is adequate provision of facilities for inhabitants of their area for recreational, cultural and social activities.

6. Land Purchase Requirement

There is no land purchase requirement. The land is in Council ownership and forms part of the Education, Leisure and Housing Service Estate.

7. Impact on Local Business, Employment and the Economy

The project will provide opportunities for local construction companies to tender for the works, potentially delivering local economic development in adherence to the Council’s Sustainable Procurement Policy.

The proposed facility would enable the Orkney Gymnastics club to reach its full potential, with opportunity to increase membership, reduce the waiting list, create employment opportunities, and create a timetable that supports gymnasts participating at recreational level through to elite competition.

The project will create opportunities for Orkney to host regional and national gymnastics events, competitions and training camps. The whole facility would enhance Orkney as a real option for national teams and squads as a training camp/ location.

Having a specialist gymnastics facility will enable Orkney Gymnastics club to develop and train more coaches and club staff creating opportunities for local people to gain skills and develop employment opportunities.

The proposed facility would create a facility that could be used from preschool to older people through initiatives such as Gym Tots, through to walking football, therefore generating whole community impact.

Isles impact. The Orkney Gymnastics club is already working with Scottish Gymnastics to implement a gymnastics instructor's course, which will enable people on the isles to run recreational and participation classes. The proposed facility would provide a perfect facility to support and develop these coaches as part of their training with a view of developing gymnastics on the isles and inter isles competitions, displays and events.

Although gymnastics, football and rugby would be key beneficiaries, other sports and user groups would also benefit from the proposed facility including athletics, walking groups, mother and toddlers to over 50s club, but also events and activities other than sport could also make use of the space such as Culture events and performances.

It is suggested that the development of the proposed facility would generate more availability in existing facilities and in doing so providing opportunities for growth and development of sports such as netball, badminton and sports and activities including health and rehabilitation referral activities.

8. Risk Assessment

Risk of not proceeding:

- The opportunity to secure £1,000,000 of indirect match funding (funds provided at zero-net cost to the Council) from **sportscotland** and the Scottish Government's National Islands Plan would be lost.
- The opportunity to secure additional external funding from other external partners including the Scottish Football Association and the Scottish Rugby Union would be lost.
- The opportunity to meet the continuing and growing demand on existing indoor facilities would be lost.
- The opportunity for the sport of gymnastics in Orkney to grow and provide more opportunities and successes would be lost.
- The opportunity to contribute to National priorities such as increasing participation in sport and physical activity and providing facilities that help everyone enjoy sport at every level, and help attract world class events would be lost.
- The opportunity to further enhance and grow participation in sport and physical activity by providing a high quality environment protected from the elements would be lost.
- Loss of confidence in the Council's ability to deliver the project which originates from the Sport and Facilities strategy and the local community who have participated in the project since 2017.
- The opportunity to assist Orkney Gymnastics Club to secure a specific gymnastics facility that would greatly contribute to the development of the sport in Orkney would be lost.

Risk of proceeding:

- Estimated requirement of £30,000 to develop a Stage 2 Capital Project Appraisal.
- Officers time to develop a Stage 2 Capital Project Appraisal in the timescales required.
- The current estimated borrowings from the Loans Fund to develop this project are in the region of £8,300,000.

- There will be ongoing revenue costs associated with the building such as utility costs, non-domestic rates, cleaning costs, insurance costs, maintenance and potentially additional staffing costs. These costs are not fully quantified at this stage, and will be offset by income generated, however it should be recognised that this project could result in a revenue budget pressure for Leisure Services.

9. Recommendation

It is proposed to develop a covered synthetic training pitch suitable for rugby and football, including a separate space specifically for gymnastics. Structure dimensions (W x L) 48.8m x 94.4m with a footprint of 4,607m² and a height of 16.9m at the Kirkwall Grammar School site shown as option B3.

Annex A

Feasibility Study.