

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 27 August 2020

Public Authority: Morecambe Town Council

Address: Morecambe Town Hall
Marine Road
Morecambe
Lancashire
LA4 5AF

Decision (including any steps ordered)

1. The complainant submitted eleven separate requests to Morecambe Town Council ("the Council") between 5 and 29 June 2019. The requests each related to various information. The Council initially refused ten of the requests under section 14(1) of the FOIA (vexatious requests). During the course of the Commissioner's investigation, the Council issued a fresh response to the complainant within which it refused all eleven of these requests under section 12(1) of the FOIA (cost limit) because it estimated that the cost of compliance would exceed the appropriate limit.
2. The Commissioner's decision is that the Council was not entitled to rely upon section 12(1) of the FOIA (cost limit) as its basis to refuse these requests and that it has not complied with its duty to provide advice and assistance under section 16 of the FOIA. The Council also failed to issue a response to request K within 20 working days and therefore breached section 10(1) of the FOIA.
3. The Commissioner requires the Council to take the following steps to ensure compliance with the legislation.
 - Issue a fresh response to all eleven of these requests which does not cite section 12(1) of the FOIA.

4. The Council must take these steps within 35 calendar days of the date of this decision notice. Failure to comply may result in the Commissioner making written certification of this fact to the High Court pursuant to section 54 of the Act and may be dealt with as a contempt of court.

Request and response

5. Between 5 and 29 June 2019, the complainant wrote to the Council and made the following eleven requests under the FOIA:

A. MTC48/19/1 – payments without invoices

On 5 June 2019:

"I wish to make a Freedom of Information request for the all payments made without proper accounting (re: invoices/receipts etc) with income obtained from Morecambe precept payers and grants (re: Portas, etc) since the current Town Clerk/Responsible Finance Officer took up office

- *cheque numbers, with the date, amount and name on the cheque*
- *the names of the councillors who signed off the cheque for payment*
- *the name of the councils auditor at the time of the payments*
- *the name of the Chair of the Finance & Management Committee at the time of the payment"*

B. MTC49/19/2 - expenditure of Portas money/Officers time/expenses

On 6 June 2019:

"I wish to make the following freedom of information request (prompted by your continuing practice of ignoring and disrespecting communication) regarding the above as the Council submitted the bid for this public money and took up the responsibility for being the custodians for the expenditure of this money to be expended in accordance with the Town Councils policies, financial regulations and standing orders.

Please supply -

- *all purchase orders, invoices and receipts*
- *information relating to what service or goods the payment was for.*

- *cheque numbers/date on the cheque/name of person, organisation payment is made/cheque amount/councillors names who signed off the cheque to enable payment/the name of the councils auditor/the name of the Chair of the Council and Chair of the Finance & Management Committee, at the time of the payment)*
- *full details of cash payments (date of payment/ name of person, organisation payment is made/cash amount/name of the councillors who approved payment/ the name of the councils auditor/the name of the Chair of the Council and Chair of the Finance & Management Committee, at the time of the payment)*
- *the budget the council allocated for officer time/expenses for this project (pre & post bid) and the meeting and minute number for which this was approved by full council.*
- *the total officer time/costs and officer expenses (pre and post bid) expended for the project*
- *evidence that the money was expended in compliance with the Councils policies, standing orders and financial regulations (viz: the payment made for the website which cost 20,000 GBP – provide copies of the quotations received for the service as per the Councils standing orders)”*

C. MTC50/19/3 - non responses to written communication received/appointment request with the Town Council Officers

On 7 June 2019:

“I wish to make the following freedom of information request

Please supply full details (the date of communication, the name of the person/organisation) of each correspondence not responded to and the reason for the disrespect and ignorance and clarify if it was the Town Clerk/RFO's decision to do so and if not whose instructions the Town Clerk/RFO was carrying out. If it was full councils instructions please identify the date of the council meeting and minute number.”

D. MTC51/19/4 - website clean up/censorship? – recording of meetings <https://www.morecambe.gov.uk/recordings-of-council-meetings/>

On 8 June 2019:

“For the record the above practice on the councils website is clearly evident. Who is responsible for the actions and what is the purpose of the clean up/censorship?”

Being the person who requested recording of council meetings during public participation because of the consistent practice of the minutes of meetings accepted by members failing in my opinion to accurately report (omissions, distortion, obfuscation) information that I had heard and stated under public participation at meetings, as well as evidence of members and officers failing to comply with the councils code of conduct, I and other interested you tube viewers have watched these.

Out of the 31 videos uploaded to date only 14 now remain viewable. As at todays date the links for the following meetings produce a blank screen –

- 21/3/19
- 11/10/18
- 20/9/18
- 19/7/18
- 28/6/18
- 17/5/18 – screen states “this video is unavailable” Why is it unavailable?
- 7/2/18 extraordinary meeting
- 18/1/18 reconvened meeting
- 7/2/18
- 16/11/17
- 20/6/17
- 16/3/17
- 15/9/15
- 20/11/14
- 25/11/14
- 17/7/14
- 15/5/14

The council had facilitated the you tube viewers comments facility on all the above which had received some valid relevant non trolling comment and opinions/feedback.

I am making a request to answer all the questions raised in this correspondence as a FOI request and a FOI request to supply the following information –

- *a copy on a CD with all the 31 recordings to date plus those yet to be uploaded – the meeting on 6/6/19 and the 2019 Annual Town meeting.*
- *the date each uploaded recording was removed/disappeared who was responsible for this and the reason for doing so.*

I note that for the following periods the practice of uploading recordings of meetings was not done

- 20/11/14 – 15/9/15
- 10/12/15 – 19/1/17

Why not? Can you assure me that in future all future full council meetings will be recorded and remain on the councils website?

I note for all up to and including the recording on 10/12/15 a useful link was also included for viewing the minutes of that meeting but this practice was discontinued thereafter. Why was that?

I wish to make a request that you reinstate the missing recordings on the website asap including all the comments made that were present before the video disappeared and inform me when this has been completed."

E. MTC52/19/5 - Chairman's oath/acceptance of office, Town Clerk/RFO job specification and contract of employment, Assistant Clerk job specification and contract of employment

On 9 June 2019:

"I am making a FOI request for a copy of the following information to be forwarded electronically to the above e mail address which you have previously used.

- *Chairman's oath/acceptance of office*
- *Town Clerk/RFO job specification and contract of employment*
- *Assistant Clerk job specification and contract of employment"*

F. MTC53/19/6 - unsigned minutes of Council meetings

On 14 June 2019:

"I am making the following FOI request.

The minutes of Full Council meetings should be signed by the Chairman. There is only one document on the Councils website with signed Full Council minutes. The meeting on 15 October 2009 signed by the Chair Councillor Evelyn Archer RIP.

I am requesting an appointment to view ALL the signed minutes at Morecambe Town Hall as a FOI request.

Please explain why there is no provision for a signature by the Chairman, as agreement of the minutes for the Annual Town meetings?"

G. MTC54/19/7 - Annual Town Meeting 23 May 2019 draft minutes & recording

On 17 June 2019:

"I am making a FOI request for a copy of the draft minutes and also the recording of the ATM 2019 as sadly again they have not been promptly published on the website, despite the council meeting on 16 May and 6 June having their draft minutes and recordings published with the date of publication on them."

H. MTC55/19/8 - Toilet expenditure central promenade public toilets owned by Lancaster City Council

On 27 June 2019:

"I am making a FOI request for the following information, a full build of ALL costs incurred including officer costs

- 1. Costs up to the end of the last financial year*
- 2. Revenue received up to the end of the last financial year*
- 3. Costs budgeted for in the current financial year*
- 4. Revenue budgeted for in the current financial year*
- 5. Any further future financial liabilities not included in the above."*

I. MTC56/19/9 - payments to Morecambe BID, Morecambe in Bloom & Lancaster City Council

On 28 June 2019:

"I am making the following FOI (freedom of information) request

Please disclose the total amount of monies paid to date, list each payment, the date of payment, provide full details of what the payment was for, provide a copy of the receipt/invoice, copies of the signed cheque identifying the councilor names or if payment is made by other means identify the names of the members who authorised such payments to –

- 1. Morecambe BID*
- 2. Morecambe in Bloom*
- 3. Lancaster City Council "*

J. MTC57/19/10 - MTC e mail dated 14 June 2019

On 28 June 2019:

"Further to the above please respond under a FOI request to supply the following information –

- 1. "I am instructed by the Council only to respond to you via the Royal Mail and not via email"
Please notify me of the names of the members who instructed you to do this and if it was as you allege "by the Council" provide the minute number of the meeting which refers to that decision*

Also clarify how you are complying with your public duty as a highly paid Officer in obeying such instructions which are not in the public interest.

- 2. Regarding the Council website please forward copies/details of all communication (letters, e mails, phone calls) since the date I notified you it was not operational. Also provide a back up copy of the website. My correspondence/FOI request MTC51 raises my concerns at a Council cover up/clean operation being carried out to erase the truth to which I am awaiting a response."*

K. MTC58/19/11 - Internal and external audit reports

On 29 June 2019:

"Please supply the following information as a FOI request from the date the council was established in 2009 :–

- copies of internal audit reports*
 - the cost of each of the above*
 - copies of external audit reports*
 - the cost of each of the above"*
- 6. On 28 June 2019, the Council responded to the ten requests outlined at A to J above. The Council refused to provide the requested information citing section 14(1) of the FOIA. As its refusal notice predated 29 June 2019, request K was not referred to in the Council's response. In the Council's refusal notice it addressed the following:*
 - "MTC57 MTC e mail dated 28th June 2019 with FOI Request*
 - MTC56 Payments to Morecambe BID, Morecambe in Bloom & Lancaster City Council e mail dated 28th June 2019*
 - MTC55 Toilet expenditure (FOI request) dated 27th June 2019*

- *MTC54 – ATM 2019 (FOI request) dated 17th June 2019*
 - *MTC53 unsigned minutes (FOI request) dated 14th June 2019*
 - *MTC53 unsigned minutes, chairs oath of office, staff contract/job spec (FOI request) dated 14th June 2019*
 - *MTC52 Chairman's oath office, job spec/contracts for Town Clerk & Assistant (FOI request) date 9 June 2019*
 - *MTC51 letter – clean up/censorship of recordings on website (FOI request) dated 8 June 2019*
 - *MTC50 non response to written coms/appointment request with Officers (FOI request) dated 7th June 2019*
 - *MTC 49 Expenditure of Poras money (FOI request) dated 6th June 2019*
 - *MTC48 – payments without invoice (FOI request) dated 5th June 2019."*
7. It appears the Council referred to the request labelled MTC53, dated 14 June 2019, twice in its refusal notice. This was because the complainant submitted one request on 14 June 2019 but then resubmitted this and asked for the previous request of 14 June 2019 to be deleted. The Council therefore only refused ten of the requests despite referencing eleven in its response.
8. The Council did not offer an internal review in its refusal notice to the complainant. As such, no internal review was requested and this complaint was accepted for investigation without one.
9. During the course of the Commissioner's investigation, the Council changed its position and issued a fresh response to the complainant within which it refused all eleven requests A-K under section 12(1) of the FOIA (cost limit). This fresh refusal notice was issued to the complainant on 28 February 2020.

Scope of the case

10. The complainant contacted the Commissioner on 14 August 2019 to complain about the way his requests for information had been handled.
11. In the Council's initial response to these requests, it did not refer to request K as listed above. However, the Commissioner has considered request K as part of this complaint. This is because she understood the Council's response to the complainant of 28 June 2019 to extend to cover the information request of 29 June 2019.
12. The initial scope of this investigation was to consider whether the Council had correctly cited section 14(1) of the FOIA as a basis to refuse these requests. However, the Council changed its position during the course of the Commissioner's investigation and issued a fresh refusal

notice to the complainant which cited section 12(1) of the FOIA. As the Council withdrew its citing of section 14(1) of the FOIA, and instead cited section 12(1), the scope of this case is to determine if the Council was entitled to rely upon section 12(1) of the FOIA as its basis to refuse to comply with all eleven requests.

13. The Commissioner will also consider whether the Council has fulfilled its obligations under section 16(1) of the FOIA (advice and assistance).

Reasons for decision

Section 12(1) – cost of compliance exceeds the appropriate limit

14. Section 1(1) of the FOIA states that:

“(1) Any person making a request for information to a public authority is entitled –

(a) to be informed in writing by the public authority whether it holds information of the description specified in the request, and

(b) if that is the case, to have that information communicated to him.”

15. Section 12(1) of the FOIA provides that:

“Section 1(1) does not oblige a public authority to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the appropriate limit.”

16. The appropriate limit in this case is £450, as laid out in section 3(2) of The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 (“the Fees Regulations”). This must be calculated at the rate of £25 per hour, providing an effective time limit of 18 hours’ work.
17. In estimating whether complying with a request would exceed the appropriate limit, regulation 4(3) of the Fees Regulations states that an authority can only take into account the costs it reasonably expects to incur in:
 - determining whether it holds the information;
 - locating the information, or a document containing it;
 - retrieving the information, or a document containing it; and
 - extracting the information from a document containing it.

18. A public authority does not have to make a precise calculation of the costs of complying with a request; instead, only an estimate is required. However, it must be a reasonable estimate. In accordance with the First-Tier Tribunal decision in the case of *Randall v IC & Medicines and Healthcare Products Regulatory Agency EA/20017/0004*¹, the Commissioner considers that any estimate must be "*sensible, realistic and supported by cogent evidence*".

The Council's position

19. The Council's initial response to the Commissioner's investigation related solely to its application of section 14(1) of the FOIA. In its response to the Commissioner it stated that it had "*RESOLVED unanimously that Section 14 (1) of the FOIA applies in relation to these requests on the grounds that they are vexatious*". As part of its submissions the Council stated that, "*the cost of locating and extracting the information [...] is likely to be in excess of the limit set out in Section 12 of FOIA (£450)*".
20. In light of this, the Commissioner asked the Council to confirm if it actually intended to apply section 12 of the FOIA, not section 14, and if so, to provide its submissions in respect of section 12 and section 16 of the FOIA. However the Commissioner also explained that if the Council wished to maintain its reliance on section 14(1), she required it to confirm this and provide any further evidence and information.
21. In its subsequent response to the Commissioner, the Council appeared to provide evidence in support of its application of section 14(1) while simultaneously withdrawing section 14(1) and citing section 12(1) of the FOIA. It provided evidence with the aim of demonstrating that "*there has been many requests made by [the complainant], generating much correspondence and activity across several years. What we have sent to you is by no means everything relating to each request for information, which runs into hundreds of pages of emails, notes and other supporting documents.*"
22. The Council said that since receiving the ICO's investigation letter, the Council had "***worked 60 hours**, and this is **without** locating and considering the very detailed information requested in FOI's [...]* As the regulations allow a public authority to charge the rate of £25 per hour for staff time, we have already vastly exceeded the £450 limit for public authorities – the cost so far being £1,500". The Council then set out its costs estimate for each information request within which it put forward

¹ <http://informationrights.decisions.tribunals.gov.uk/DBFiles/Decision/i136/Randall.pdf>

the argument that compliance with these requests would exceed the cost limit. In reference to its estimates, the Council stated *"all the above assumes that we will be able to locate the required information – there is no guarantee that we will be able to. The work is based on full disclosure of the evidence/information requested and on what we understand to be the quickest method of gathering the requested information."*

23. The Council also stated:

"I believe that I have explained that I have now amended the Town Council's position given the opportunity to look at the evidence in more detail. That said, and based on the very difficult position that the Assistant Clerk and I have found ourselves in and the poor working practices of the former Town Clerk, I maintain that to now provide all of the information requested would be both 'unjustified and disproportionate'. It would also seriously impact on the Town Council's ability to make immediate and lasting improvements."

"The Town Council takes seriously its duties and responsibilities under the Freedom of Information Act 2000 and accepts that we must satisfy you that we have fully complied with the law. I now conclude that, overall, the Town Council has failed in this regard."

"I will be recommending that the Chair of the Town Council, Councillor Anderton, who is a qualified and highly experienced Solicitor and I, meet with [the complainant] apologise for our shortcomings and to start a dialogue that, I hope, will result in a compromise that will be acceptable to everyone."

24. In light of the Council's responses, it became evident that the Council intended to cite section 12(1) of the FOIA. Therefore, the Commissioner wrote to the Council and acknowledged that it had withdrawn its citing of section 14(1). The Commissioner then explained that the Council was required to issue a fresh response to the complainant which must either comply with the requests or cite alternative grounds for refusing the requests. Following further correspondence, the Council confirmed to the Commissioner that it intended to rely upon section 12(1) of the FOIA.
25. On 28 February 2020, the Council issued a fresh refusal notice to the complainant, citing section 12 of the FOIA. In this, it stated, *"we would like to formally invite you to a meeting with selected Councillors and me to start a dialogue that, it hopes, will result in a compromise that will be acceptable to everyone"*.
26. The Council explained to the complainant that it had withdrawn its citing of section 14(1) and instead that,

"a formal response is again refused, this time in accordance with Section 12 (cost limit) of the FOIA. This is due to the anticipated cost of complying with the requests and that compliance is likely to place a significant administrative burden on the Town Council."

"The volume of evidence generated over several years runs into hundreds of pages of emails, notes and other supporting documents, that we know about - there may well be more."

Unfortunately, the general poor quality of filing controls, protocols and procedures employed by the former Town Clerk for both electronic and paper files mean that documentation and evidence can take a great deal of locating and in many cases it may not be possible at all.

In addition, given the lengthy period covered by the FOI requests and the fact that staff are relatively new to the Council it is likely to take some considerable time to determine whether the information is held even before attempting to assimilate the relevance of the evidence to the matters under consideration."

"From receiving the ICO letter last November we estimate that we have worked 60 hours on this investigation to date and this is without fully considering the detailed information requested in FOI's [...] As the regulations allow a public authority to charge the rate of £25 per hour for staff time, we have already vastly exceeded the £450 limit for public authorities – the cost so far being £1,500."

27. The Council then set out its costs estimates for each request but it did not explain how it had arrived at these estimates. These were as follows:

"1)MTC48/19/1 – payments dating back to 2011 = 20 hours at a cost of £500;

2) MTC49/19/2 – expenditure on expenditure of Portas money / officers' time / expenses =30 hours at a cost of £750;

3) MTC50/19/3 – non responses to communications = 5 hours at a cost of £125;

4) MTC51/19/4 - recording of meetings & website clean up / censorship = 40 hours at a cost of £1,000;

5) MTC/19/5 - MTC52/19/5 – Chairman's oath & staff contracts of employment and job descriptions = 1 hour at a cost of £25;

6) MTC53/19/6 – unsigned Minutes of Council meetings dating back to 2009 = 5 hours at a cost of £125;

7) MTC54/19/9/7 Annual meeting draft Minutes & recording = 1 hour at a cost of £25

8) MTC55/19/8 – toilet expenditure = 2 hours at a cost of £50

9) MTC56/19/9 – payments to Morecambe Business Improvement District; Morecambe in Bloom and Lancaster City Council = 10 hours at a cost of £250

10) MTC57/19/10 – MTC email 14th June 2019 = 1 hour at a cost of £25;

11) MTC58/19/11 – Internal and external audit reports since 2009 = 5 hours at a cost of £125"

28. The Council ultimately stated:

"Given the very problematic position that the Town Council finds itself in relating to the previous governance and internal control arrangements and the poor working practices of the former Town Clerk, it is their view that to now provide all of the information requested would be unjustified and disproportionate and would seriously impact on its ability to make immediate and lasting improvements."

29. In light of this fresh response, the Commissioner asked the Council to provide its submissions regarding section 12 and 16 of the FOIA to the Commissioner. She also explained that under section 12, the Council could not take into account the cost of the time it has taken to respond to the ICO's investigation. A public authority can only take into account the time taken for determining whether the information is held, and locating, retrieving and extracting the requested information.

30. The Council acknowledged that it had not provided a sampling exercise in its previous response however it stated that its estimates were *"based on a 'representative sample of the information falling within the scope of the request' and 'based upon the quickest method of gathering the requested information' as well as to the best of my ability"*. It confirmed that it wished to rely on the estimates it had provided as outlined at paragraph 27 above. It stated that it had provided the requested information in relation to section 12(1) and had nothing further to add.

The complainant's position

31. In bringing this complaint to the ICO, the complainant expressed his disagreement with the Council's application of section 14(1) of the FOIA. He also raised concerns that the Council had breached section 10 of the FOIA by not responding to one of the requests, dated 29 June 2019 (request K).

The Commissioner's conclusion

32. The Commissioner is not persuaded by the Council's position or the arguments it has submitted in support of its application of section 12. The Council did not provide a sampling exercise and it is unclear how it calculated the cost estimates it has provided. The Council's argument that its response to the Commissioner's investigation has exceeded the cost limit is also not accepted. As explained above, this is not something a public authority can take into account when estimating the costs of complying with an information request. Ultimately, the Commissioner does not accept that the Council has provided enough evidence or explanation to clearly demonstrate that its cost estimate was reasonable.
33. Therefore, it is the Commissioner's view that the Council was not entitled to rely on section 12(1) of the FOIA to refuse to comply with the complainant's eleven requests. The Council is therefore required to take the step as outlined at paragraph 3 above.

Section 10

34. In the section 12(1) arguments the Council submitted to the Commissioner, it included request K, which was originally submitted on 29 June 2019. However, as the Council's initial refusal notice was issued on 28 June 2019, it only refused ten out of the eleven requests. Therefore, request K was not responded to within 20 working days of receipt.
35. Section 10 of the FOIA states that:
- Any person making a request for information to a public authority is entitled –*
- (a) To be informed in writing by the public authority whether it holds information of the description specified in the request, and*
- (b) If that is the case, to have that information communicated to him.*
36. The Commissioner considered that the request in question fulfilled the above criteria and therefore constituted a valid request for recorded information under the FOIA.
37. Section 10 of the FOIA states that responses to requests made under the Act must be provided, "*promptly and in any event not later than the twentieth working day following the date of receipt.*"
38. The Council did not provide a substantive response to request K within 20 working days of receipt. Therefore, the Commissioner's decision is

that the Council has breached section 10 of the FOIA. As the Council responded to request K in its amended refusal notice of 28 February 2020, no remedial step in relation to this breach is necessary.

Section 16 – advice and assistance

39. Section 16 of the FOIA states:

“(1) It shall be the duty of a public authority to provide advice and assistance, so far as would be reasonable to expect the authority to do so, to persons who propose to make, or have made, requests for information to it.

(2) Any public authority which, in relation to the provision of advice or assistance in any case, conforms with the code of practice under section 45 is to be taken to comply with the duty imposed by subsection (1) in relation to that case.”

40. The Commissioner's view is that, where a public authority refuses a request under section 12(1) of the FOIA, complying with the section 45 Code of Practice will fulfil its duty under section 16(1).

41. Paragraph 2.10 of the section 45 Code of Practice states:

“Where it is estimated the cost of answering a request would exceed the ‘cost limit’ beyond which the public authority is not required to answer a request (and the authority is not prepared to answer it), public authorities should provide applicants with advice and assistance to help them reframe or refocus their request with a view to bringing it within the costs limit”.

42. In addition, paragraph 6.9 states that *“public authorities should consider what advice and assistance can be provided to help the applicant reframe or refocus their request with a view to bringing it within the cost limit”.*

43. In the Council's correspondence with the Commissioner, it stated that, *“the Town Council does now wish to provide advice and support to [the complainant] in refining his FOI requests, in line with Section 16”.*

44. The Council invited the complainant to a meeting and encouraged the complainant to respond to its section 12 refusal notice in an attempt to resolve this matter. Aside from this, it did not provide the complainant with any advice on narrowing the scope of his requests in order to lower the Council's estimate of the costs of the request.

45. Therefore, the Commissioner does not consider that the Council took appropriate steps to offer advice and assistance in order to bring the request within the appropriate cost limit. She therefore considers that the Council's advice and assistance was not sufficient to meet the requirements of section 16 of the Act.

Right of appeal

46. Either party has the right to appeal against this decision notice to the First-tier Tribunal (Information Rights). Information about the appeals process may be obtained from:

First-tier Tribunal (Information Rights)
GRC & GRP Tribunals,
PO Box 9300,
LEICESTER,
LE1 8DJ

Tel: 0300 1234504

Fax: 0870 739 5836

Email: grc@justice.gov.uk

Website: www.justice.gov.uk/tribunals/general-regulatory-chamber

47. If you wish to appeal against a decision notice, you can obtain information on how to appeal along with the relevant forms from the Information Tribunal website.
48. Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this decision notice is sent.

Signed

Ben Tomes
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