

Alton Neighbourhood Development Plan Review 2011-2028

**A report to East Hampshire District Council on the
Alton Neighbourhood Development Plan Review**

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Executive Summary

- 1 I was appointed by East Hampshire District Council in July 2021 to carry out the independent examination of the Alton Neighbourhood Development Plan Review.
- 2 The examination was undertaken by written representations. I visited the neighbourhood area on 22 July 2021.
- 3 The Plan proposes a series of modifications to the policies in the 'made' Plan. It continues to seek to bring forward positive and sustainable development in the neighbourhood area. There is a very clear focus on safeguarding its distinctive character.
- 4 The Plan has been underpinned by community support and engagement. The community has been engaged in its preparation in a proportionate way in its review.
- 5 Subject to a series of recommended modifications set out in this report I have concluded that the Alton Neighbourhood Development Plan Review meets all the necessary legal requirements and should be made by East Hampshire District Council.

Andrew Ashcroft
Independent Examiner
31 August 2021

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Alton Neighbourhood Development Plan Review 2011 to 2028 (the 'Plan').
- 1.2 The Plan has been submitted to East Hampshire District Council (EHDC) by Alton Town Council (ATC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012. The NPPF continues to be the principal element of national planning policy. It was updated in both 2018, 2019 and 2021.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether or not the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative Plan, or a potentially more sustainable Plan except where this arises as a result of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope. Any plan can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted plan has been designed to be distinctive in general terms, and to be complementary to the development plan in particular. It has been prepared in order to update and refresh the 'made' Plan through a formal review process.
- 1.6 Within the context set out above this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends modifications to its policies and supporting text.

2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by EHDC, with the consent of ATC, to conduct the examination of the Plan and to prepare this report. I am independent of both EHDC and ATC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have over 35 years' experience in various local authorities at either Head of Planning or Service Director level. I am a chartered town planner and have significant experience of undertaking other neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral Service.

Examination Outcomes

- 2.4 The examination process for the review of a 'made' neighbourhood plan is set out in Section 3 of this report.
- 2.5 The outcome of the examination is set out in Section 8 of this report.

Other examination matters

- 2.6 In examining the Plan I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
 - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
 - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report. I am satisfied that the submitted Plan complies with the three requirements subject to recommended modifications included in this report.

3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan.
- the Basic Conditions Statement.
- the Consultation Statement.
- the EHDC SEA screening report (February 2021)
- the EHDC HRA screening report (August 2021)
- the Modifications Proposals Statement
- the representations made to the Plan.
- the Town Council's responses to my Clarification Note.
- the East Hampshire District Joint Core Strategy (adopted June 2014)
- the National Planning Policy Framework (July 2021).
- Planning Practice Guidance (March 2014 and subsequent updates).
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 22 July 2021. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. The visit is covered in more detail in paragraphs 5.9 to 5.15 of this report.

3.3 It is a general rule that neighbourhood development plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted plan, I was satisfied that the Plan could be examined without the need for a public hearing. I advised EHDC of this decision once I had received the responses to the questions in the clarification note.

3.4 The Neighbourhood Planning Act 2017 identifies the circumstances that might arise as qualifying bodies seek to review 'made' neighbourhood plans. It introduces a proportionate process for the modification of neighbourhood plans where a neighbourhood development order or plan has already been made in relation to that area.

3.5 There are three types of modification which can be made to a neighbourhood plan or order. The process will depend on the degree of change which the modification involves and as follows:

- minor (non-material) modifications to a neighbourhood plan or order which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document, and would not require examination or a referendum; or
- material modifications which do not change the nature of the plan or order and which would require examination but not a referendum. This might, for example, entail the addition of a design code that builds on a pre-existing design policy, or the addition of a site or sites which, subject to the decision of

the independent examiner, are not so significant or substantial as to change the nature of the plan; or

- material modifications which do change the nature of the plan or order would require examination and a referendum. This might, for example, involve allocating significant new sites for development.

3.6 ATC has considered this issue. It takes the view that the proposed changes to the 'made' Plan fall into the second category. The changes to the Plan relate to housing delivery and allocated sites in Policy HO3. They are described in detail in Section 7 of this report.

3.7 EHDC takes the same view as ATC on the scale and nature of the modifications to the policies in the 'made' Plan.

3.8 I have considered these assessments very carefully. I have concluded that the review of the Plan includes material modifications which do not change the nature of the Plan and which would require examination but not a referendum. I have reached this decision for the following reasons:

- the policies largely update those in the 'made' Plan; and
- the modifications in the review bring the Plan up to date to reflect changes in national and local planning policy.

3.9 In these circumstances I will examine the Plan against Schedule A2 of the Planning and Compulsory Purchase Act 2004. The regulations identify that this report must recommend one of three outcomes:

- that the local planning authority should make the draft plan; or
- that the local planning authority should make the draft plan with the modifications specified in the report; or
- that the local planning authority should not make the draft plan.

3.10 Section 7 of this report assesses the proposed changes to Policy HO3 and identifies any modifications required to ensure that the policy meets the basic conditions. My recommendation is then set out in Section 8.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development management decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012 the Town Council has prepared a Consultation Statement. The Statement reflects the neighbourhood area and its policies. It also provides specific details on the consultation process that took place on the pre-submission version of the Plan from February to March 2021.
- 4.3 The Statement sets out details of the consultation events that were carried out in relation to the initial stages of the Plan. They were appropriate for the circumstances of the Plan itself. Details are provided about the engagement with the statutory bodies and the public consultation events in the area. Specific events and engagement techniques highlighted included:
- the councillor workshop sessions (October 2020);
 - the circulation of leaflets to all households (February 2021); and
 - the notifications provided to landowners and statutory consultees (February 2021).
- 4.4 The Statement sets out the range of local and statutory organisations that were advised about the preparation of the Plan in general, and its pre-submission consultation phase in particular. Appendix 1 reproduces the February 2021 leaflet. This gives life and interest to the Statement.
- 4.5 The Statement also sets out details of the responses received to the consultation process on the pre-submission version of the Plan. It also sets out how the Plan responded to those representations. The exercise has been undertaken in a very thorough fashion.
- 4.6 From all the evidence available to me as part of the examination, I have concluded that the Plan has sought to develop an inclusive approach to seeking the opinions of all concerned throughout the process. The consultation process undertaken is proportionate to the nature of the review of the Plan. EHDC has carried out its own assessment of this matter as part of the submission process and has concluded the consultation process has complied with the requirements of the Regulations.

Representations Received

- 4.7 Consultation on the submitted plan was undertaken by EHDC that ended on 5 July 2021. This exercise generated comments from the statutory organisations listed below:

- Havant Borough Council
- Historic England
- Natural England
- South East Water
- The Coal Authority
- Waverley Borough Council

4.8 I have taken account of the three representations received as part of the examination of the Plan. Indeed, the supporting nature of the comments highlights the professional way in which the Plan has been reviewed.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area is the administrative area covered by Alton Town Council. In 2011 it had a population of 17 816 persons living in 7755 households. It was originally designated as a neighbourhood area on 8 May 2014.
- 5.2 The neighbourhood area is a very pleasant town set in an attractive wider natural landscape. The town is located within a distinctive chalk landscape setting, at the source of the River Wey. It sits relatively hidden in a hollow, which is encircled by sloping downland that provides a green skyline. The northern edge of the South Downs National Park lies to the immediate north west of the town. The A31 is located to the south and east of the town.
- 5.3 As the Plan describes although Alton has expanded in recent decades, its built-up area remains relatively contained within a tight-knit area. It has four elements - the central older areas; the outer residential areas; the industrial areas; and Holybourne village. There are four conservation Areas, three in Alton and one in Holybourne. The main focus of the town centre is the High Street, which runs south-west to north-east, with the Market Square just off this axis in Lenten Street. It is a commercial and social hub for the town and its rural hinterland, and there is a popular weekly street market. The town attracts pupils from the surrounding area to its secondary schools and sixth-form college.

Development Plan Context

- 5.4 The development plan for East Hampshire District is the East Hampshire District Local Plan Joint Core Strategy. It was adopted in May 2014 and covers the period to 2028.
- 5.5 Policies CP2 and CP10 of that Plan are particularly relevant to the formulation of the submitted review of the neighbourhood plan. In the context of Policy CP10, Alton is identified as one of a series of settlements where sustainable development will be focused.
- 5.6 The review of the neighbourhood plan comments about delivery which has already taken place in the town in the Plan period.

Unaccompanied Visit to the neighbourhood area

- 5.9 I visited the neighbourhood area on 22 July 2021. I approached the town from the A31 from the north. I parked on London Road and took the opportunity to walk into the town centre.
- 5.10 I looked initially at the railway station. I saw its wider importance and significance in the town. I also saw the adjacent Mid Hants Watercress railway platforms.

- 5.11 I then looked at the former Alton Magistrate Court site. I saw the retired housing development which was taking place.
- 5.12 I then walked into the commercial and retail part of the town centre. I saw its attractive mix of national and independent shops and other related town centre uses.
- 5.13 I then walked to the Molson Coors site to the immediate south of High Street. I saw that demolition was taking place and that the site was boarded up.
- 5.14 I walked back along High Street and up Church Street to St Lawrence Church.
- 5.15 I left the neighbourhood area on the B3349. This allowed me to understand the way in which the town related to the countryside to its north.

6 The Neighbourhood Plan and the Basic Conditions

6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped considerably in the preparation of this section of the report. It is a well-presented and informative document. It is also proportionate to the Plan itself.

6.2 As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan in the area;
- be compatible with European Union (EU) obligations and European Convention on Human Rights (ECHR); and
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

6.3 I assess the Plan against the basic conditions under the following headings:

National Planning Policies and Guidance

6.4 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework (NPPF) issued in July 2021.

6.5 The NPPF sets out a range of core land-use planning issues to underpin both plan-making and decision-taking. The following are of particular relevance to the Alton Neighbourhood Plan Review:

- a plan led system – in this case the relationship between the neighbourhood plan and the adopted Joint Core Strategy;
- delivering a sufficient supply of homes;
- building a strong, competitive economy;
- recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
- taking account of the different roles and characters of different areas;
- highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
- conserving heritage assets in a manner appropriate to their significance.

6.6 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic

needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.7 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and ministerial statements.
- 6.8 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms. It sets out a positive vision for the future of the neighbourhood area giving appropriate weight to the strategic delivery of new housing in East Hampshire.
- 6.9 At a more practical level the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This was reinforced with the publication of Planning Practice Guidance in March 2014. Paragraph ID:41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise and supported by appropriate evidence.
- 6.10 As submitted the Plan does not fully accord with this range of practical issues. The majority of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

- 6.11 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social and environmental. It is clear that the submitted review of the Plan has been designed to continue to achieve sustainable development in the neighbourhood area. It has a particular focus on promoting sustainable housing development in the town whilst safeguarding its built and natural heritage.

General conformity with the strategic policies in the development plan

- 6.12 I have already commented in detail on the development plan context in East Hampshire in paragraphs 5.4 to 5.8 of this report. I am satisfied that subject to the incorporation of the modifications recommended in this report that the submitted Plan is in general conformity with the strategic policies in the development plan.
- 6.13 I also consider that the submitted Plan delivers a local dimension to this strategic context. The Basic Conditions Statement helpfully relates the Plan's policies to policies in the development plan. Subject to the recommended modifications in this report I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

European Legislation and Habitat Regulations

- 6.14 The Neighbourhood Plan General Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.15 In order to comply with this requirement EHDC published a screening report in February 2021 on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. The report is thorough and well-constructed. It builds on the work undertaken as part of the initial plan-making process. As a result of this process, it concluded that the Plan is not likely to have any significant effects on the environment and accordingly would not require SEA.
- 6.16 EHDC produced a separate screening report on habitats regulations assessment (HRA) matters in August 2021. It takes account of the likely effects of development in the neighbourhood area on the Wealden Heaths Phase II Special Protection Area and The Solent European sites.
- 6.17 The HRA screening report concludes that the Plan is not considered to have the potential to cause a likely significant adverse effect on a European protected site. It also concludes that there will be no likely significant in-combination effects. Its level of detail provides assurance that this important matter has been comprehensively addressed.
- 6.18 The screening reports include the responses received as part of the required consultation. In doing so they provide assurance to all concerned that the submitted Plan takes appropriate account of important ecological and biodiversity matters.
- 6.19 Having reviewed the information provided to me as part of the examination, I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of European obligations.
- 6.20 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On the basis of all the evidence available to me, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

7 The details of the Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. In particular, it recommends detailed modifications to ensure that the Plan has the necessary precision to meet the basic conditions.
- 7.2 My recommendations focus on Policy HO3 given that the basic conditions relate primarily to the policies in neighbourhood plans.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the Plan area. The wider community and ATC have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (Section 41-004-20190509) which indicates that neighbourhood plans must address the development and use of land.
- 7.5 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

General Context to the Plan Review

- 7.6 The Modification Proposal Statement comments that ATC proposes to modify Policy HO3 (New Housing Site Allocations) of the 'made' Plan. That policy has been modified to:
- remove two 'made' Plan allocations as a result of their being at the advanced stages of build out and complete or almost complete;
 - retain two 'made' Plan allocations as a result of their either being at the early stages of being built out or have not yet commenced;
 - modify two 'made' Plan allocations in terms of reduced development capacity due to the Town Council now having further detailed information regarding site constraints; and
 - make two new housing allocations - both sites are within the existing Settlement Policy Boundary and are coming forward through the planning application process (and in accordance with Policies CP2 Spatial Strategy and CP10 Spatial Strategy for Housing of the District Council's Joint Core Strategy).
- 7.7 The current review of the Plan has been prepared in a very effective fashion. The distinction between its supporting text and its policies is very clear. The Plan includes a series of very helpful maps.
- 7.8 In addition the presentation of the Plan is very good. The package of submission documents is proportionate to the neighbourhood area in general, and to the review of the Plan in particular. In combination the documents helpfully identify the aspects of the Plan which have been updated.

- 7.9 The revisions to the made Plan has been very carefully considered. ATC's ambition to review the Plan responds positively to national guidance and associated best practice. The Plan continues to provide a clear vision for the neighbourhood area. The review addresses a balanced range of issues. It is underpinned by an appropriate evidence base and properly takes account of the elements of the Plan which have been implemented since it was 'made'.
- 7.10 The review of the Plan is underpinned by a Modification Statement Proposal. It is a first-class document. The wider approach which has been taken by ATC would be a very useful and effective model for others to use in the review of their made neighbourhood plans.

The modified Policy HO3

- 7.11 Policy HO3 is proposed to be modified to set out the housing supply provisions as of January 2021 in respect of completions, commitments and allocations. The revised housing supply total of 877 dwellings reflects losses and gains from the figures included in the made Plan.
- 7.12 The losses consist of 21 dwellings from the original land off Wilsom Road (14 dwellings) and land east of Selbourne Road (7 dwellings) allocations (as a result of site constraints at the planning application stages). The gains consist of two additional proposed site allocations at Molson Coors (283 dwellings) and at Alton Magistrates Court (43 dwellings) totalling 326 dwellings. Both new site allocations have come forward through the planning application process. The Molson Coors site has received a resolution to grant planning permission and the Alton Magistrates Court site has already secured planning permission. The recalculation shows that the housing supply figure continues to be in excess of what would have been its reasonable contribution towards the objectively-assessed housing need for the District.
- 7.13 EHDC and ATC consider that the modifications are minor and not material. I am satisfied that the modifications are minor in their nature. They update the Plan based on the ongoing development of sites allocated in the made Plan and recent planning permissions within the settlement boundary.
- 7.14 In presentational terms the modified policy incorporates two separate housing sites (Molson Coors and the Magistrate Courts sites) into the same element of the policy. This is unusual in its own right. In addition, it does not conform with the approach taken elsewhere in the policy which shows one site per element of the policy. As such I recommend that Policy HO3 (f) becomes Policy HO3 (f) and Policy HO3 (g) for Molson Coors and the Magistrate Courts sites respectively. ATC responded positively to this approach in its response to the clarification report
- 7.15 Once the Plan review is made it will become a free-standing document. As such I recommend that some of the details in the Statement on the deletion of the two housing sites included in the 'made' Plan is incorporated with the headings of the two former elements of the policy (rather than 'Deleted' as currently drafted). This would provide a better audit trail for the reader of the Plan in the future.

This approach could also be usefully applied to the map on page 29 in general, and to the striking out of the two sites concerned in the key in particular.

Reconfigure Policy HO3 (f) so that it becomes Policy HO3 (f) and Policy HO3 (g) for Molson Coors and the Magistrate Courts sites respectively.

In Section 6 of the Plan replace 'Deleted' with 'At an advanced stages of build out or almost complete' after the sub headings for HO3(b) and HO3(d)'

On the key on the map on page 29 replace the line through sites 3 and 5 with the site number and name followed by: 'as at April 2021 at an advanced stages of build out or almost complete'

Other Matters – General

- 7.16 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly as a result of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan as a result of the recommended modifications to the policies. It will be appropriate for EHDC and ATC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies.

Other Matters – Specific

- 7.17 The modified Plan has been prepared since 2020 within the context of the 2019 version of the NPPF. In July 2021 an updated version of the NPPF was published.
- 7.18 The principal changes between the two versions of the NPPF relate to design matters. Given that the design policies in the Plan are general in nature I am satisfied that there the submitted Plan continues to have regard to national policy. Nevertheless, I recommend that the supporting text is expanded to address the updated NPPF.

At the end the second paragraph of supporting text under the Policy DE2 heading (on page 20) add: 'This approach is consistent with the design-led approach as captured in national planning policy. The Plan sets out the Council's approach towards a clear design vision and expectations for development sites. This will ensure that applicants have as much certainty as possible about what is likely to be acceptable'

8 Summary and Conclusions

Summary

- 8.1 The Review of the 'made' Plan sets out a range of policies to guide and direct development proposals in the period up to 2028. It has been carefully prepared to refresh the Plan and to address changes in national and local planning policy which have arisen since the initial plan was 'made'.

Conclusion

- 8.2 Following my independent examination of the Plan I have concluded that the Alton Neighbourhood Development Plan Review meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.
- 8.3 The recommended modifications refine the presentation of the proposed modifications to Policy HO3. Nevertheless, the submitted review of the Plan remains fundamentally unchanged in its role and purpose.
- 8.4 I recommend that East Hampshire District Council should make the draft plan subject to the modifications set out in this report.

General Comments

- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth manner. The District Council managed the process in a very efficient way and the Town Council's response to the clarification note was both speedy and helpful.

Andrew Ashcroft
Independent Examiner
31 August 2021