

Thorpe St Andrew Neighbourhood Development Plan 2018-2038

**A report to Broadland District Council and the Broads
Authority on the Thorpe St Andrew Neighbourhood
Development Plan**

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Executive Summary

- 1 I was appointed by Broadland District Council and the Broads Authority in September 2023 to carry out the independent examination of the Thorpe St Andrew Neighbourhood Plan.
- 2 The examination was undertaken by way of written representations. I visited the neighbourhood area on 7 September 2023.
- 3 The Plan includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. There is a very clear focus on two matters. The first is the proposed designation of a series of Local Green Spaces. The second is ensuring high standards of design.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum should be held within the neighbourhood area.

Andrew Ashcroft
Independent Examiner
6 December 2023

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Thorpe St Andrew Neighbourhood Development Plan 2018-2038 ('the Plan').
- 1.2 The Plan was submitted to Broadland District Council (BDC) and The Broads Authority (BA) by Thorpe St Andrew Town Council (TSATC) 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, 2018, 2019, 2021 and 2023. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether 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 from 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 and 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 existing development plan. It seeks to provide a context in which the neighbourhood area can maintain its character and appearance and that new development is designed in a positive way.
- 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 changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then become part of the wider development plan and be used to determine planning applications in the neighbourhood area.

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 BDC, with the consent of the BA and TSATC, to conduct the examination of the Plan and to prepare this report. I am independent of BDC, the BA and TSATC. 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 40 years' experience in various local authorities at either Head of Planning or Service Director level and more recently as an independent examiner. 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 System.

Examination Outcomes

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan as submitted should proceed to a referendum; or
 - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
 - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 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 and am satisfied that they have been met.

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 SEA/HRA screening report (November 2020).
- the representations made to the Plan.
- TSATC's responses to the clarification note.
- the adopted Joint Core Strategy 2011.
- the Broadland Development Management Development Plan Document 2015.
- the Broadland Site Allocations Development Plan Document 2016.
- the Growth Triangle Area Action Plan 2016.
- the adopted Broads Local Plan 2019.
- the National Planning Policy Framework (September 2023).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 7 September 2023. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular.

3.3 It is a general rule that neighbourhood 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 concluded that the Plan could be examined by way of written representations. I was assisted in this process by the comprehensive nature of many of the representations.

3.4 The Basic Conditions Statement comments about the relationship of the Plan with the 2021 version of the NPPF. The NPPF was updated in September 2023 after the Plan had been submitted. For clarity I have assessed the Plan against the September 2023 version of the NPPF.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control 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) (Amendment) Regulations 2012, TSATC has prepared a Consultation Statement. It is proportionate to the neighbourhood area and its policies. It is commendably brief with more details included in six appendices. In the round it is a very good example of a Statement of this type.
- 4.3 The Statement records the various activities that were held to engage the local community and the feedback from each event. Section 3.5 sets out details of the comprehensive range of consultation events that were carried out in relation to the initial stages of the Plan.
- 4.4 The Statement also provides specific details on the consultation processes that took place on the pre-submission version of the Plan (June to August 2021). Appendix F of the Statement lists the comments received and advises about the extent to which the Plan was refined because of this process. The use of the Green/Amber/Red rating is particularly effective. It helps to explain the evolution of the Plan.
- 4.5 I am satisfied that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. BDC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Consultation Responses

- 4.6 Consultation on the submitted plan was undertaken by BDC. It ended on 21 August 2023. This exercise generated representations from the following organisations:
 - Sport England
 - RSPB
 - Marime Management Organisation
 - Norfolk Constabulary
 - Historic England
 - Broadland District Council
 - Natural England
 - Broads Drainage Board
 - CA Trott (Plant Hire)
 - The Broads Authority

- Berleit Limited
- The Broads Society
- Norfolk County Council

4.7 Comments were also received from several residents. I have taken account of all the representations in preparing this report. Where it is appropriate to do so, I refer to specific representations on a policy-by-policy basis.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area is the parish of Thorpe St Andrew. Its population in 2011 was 14556 persons living in 6519 households. Thorpe St Andrew is a town and civil parish in the Broadland district of Norfolk, England. It is situated on the River Yare, two miles east of the centre of Norwich. It was designated as a neighbourhood area on 28 April 2017.
- 5.2 The neighbourhood area is both interesting and diverse. It includes a historic core around the River Yare, industrial, and commercial areas in its eastern part adjacent to the A47 and a range of post-war residential developments. It also enjoys extensive green areas to the immediate north of the River Yare.
- 5.3 As the Plan comments, the importance of the river to the setting of Thorpe St. Andrew cannot be overestimated. This is most obvious where the Yarmouth Road and river run close together. To the west of the Green the historically significant buildings face the river and are best seen from the river. The steep wooded slopes to the north of the historic settlement are the setting of School Lane and Chapel Lane and of several large houses (now in commercial use). The Conservation Area is based on the historic settlement together with the wooded slopes immediately to the north.

Development Plan Context

- 5.4 The Basic Conditions Statement sets out the comprehensive nature of the development plan context for the neighbourhood area. The Joint Core Strategy (JCS) for the Greater Norwich Area (Broadland, Norwich, and South Norfolk) was adopted in 2014. Column C of the table on pages 6-13 of the Statement relates the policies in the submitted Plan to relevant parts of the submitted Plan. The Broadland Development Management Development Plan Document (BDMDPD) was adopted in 2015. Column D of the Statement undertakes a parallel exercise. The Broadland Site Allocations Development Plan Document (BSADPD) was adopted in 2016. Column E of the Statement undertakes a similar exercise.
- 5.5 In addition, the Local Plan for the Broads (BLP) was adopted in 2019. An assessment of the policies of the Thorpe St Andrew Neighbourhood Plan against the BLP is set out in Column F of the Statement.
- 5.6 The Joint Core Strategy will be replaced by the Greater Norwich Local Plan (GNLP). It was submitted for Examination in July 2021 and hearings began in December 2021. The examination process for the GNLP was ongoing at the date of submission of the Neighbourhood Plan. In this context the Statement includes a separate table which assesses the policies in the submitted Plan have also been assessed for their conformity against the emerging GNLP.
- 5.7 On the one hand, the development plan context for the neighbourhood area is complex. On the other hand, TSATC has carefully produced a Plan which seeks to complement the existing and emerging development plans.

- 5.8 In addition the submitted Plan has relied on up-to-date information and research that has underpinned existing planning policy documents. This is good practice and reflects key elements in Planning Practice Guidance on this matter.

Visit to the neighbourhood area

- 5.9 I visited the neighbourhood area on 7 September 2023. I approached it from Norwich City Centre. This helped me to understand its position in general and its accessibility to the Norwich City to the west.
- 5.10 I looked initially at the part of the neighbourhood area by the Parish Church. The importance of the River Yare to the role, setting and character was immediately self-evident. I spent some time looking inside and outside the church. The relationship between the current building and earlier buildings was very interesting. I saw the River Green and the two war memorials. The Harleys Café and the Rushcutters Arms were obvious attractions in this part of the neighbourhood area. I saw first-hand their impacts on car parking in South Avenue.
- 5.11 I then took the opportunity to walk along Yarmouth Road, up Harvey Lane and into White Farm Lane. This allowed me to look at the extensive green and open areas in this part of the neighbourhood area. I found the footpath by the former school which brought me back to Yarmouth Road by the former School.
- 5.12 I then drove along Thunder Lane and looked at the commercial and retail facilities along the Ring Road.
- 5.13 Thereafter I looked at the part of the neighbourhood area around St Andrew's School and the Dussindale Park Recreation Area. I saw the way in which it included a series of important community facilities.
- 5.14 I then looked at the industrial and commercial area between the railway line, the A1042 and the A1270. It was clear that they provided both local and strategic sources of employment opportunities.
- 5.15 Throughout the visit, I looked at the proposed range of Local Green Spaces as proposed in Policy 1 of the Plan
- 5.16 I left the neighbourhood area by driving to the A47 junction in its south and eastern corner. This highlighted the way in which the neighbourhood area connected with the overall strategic highways network.

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 in the preparation of this section of the report. It is an informative and well-presented document.
- 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.

I assess the Plan against the basic conditions under the following headings.

National Planning Policies and Guidance

- 6.3 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 2023 (NPPF).
- 6.4 The NPPF sets out a range of land-use planning principles to underpin both plan-making and decision-taking. The following are particularly relevant to the Thorpe St Andrew Neighbourhood Development Plan:
- a plan-led system - in this case the relationship between the neighbourhood plan and the local plan context in both Broadland District and the Broads Authority (as described in Section 3 of this report);
 - 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.
- 6.5 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.

- 6.6 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and the recent ministerial statements.
- 6.7 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 subject to the recommended modifications in this report. It sets out a positive vision for the future of the neighbourhood area. It includes a series of policies on a range of development and environmental matters. It has a focus on designating local green spaces and ensuring that new development is designed in a positive way.
- 6.8 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. 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.
- 6.9 As submitted the Plan does not fully accord with this range of practical issues. Most 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

- 6.10 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. The submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes a policy for employment development (Policy 6). In the social role, it includes policies on local green spaces (Policy 1), and on community facilities (Policy 7). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has policies on design and a sense of place (Policy 2), on residential amenity (Policy 4), and on heritage assets (Policy 8). This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

- 6.11 I have already commented in detail on the development plan context in the Broadland District and in the Broads Authority in paragraphs 5.4 to 5.8 of this report.
- 6.12 I consider that the submitted Plan delivers a local dimension to this strategic context and supplements the detail already included in the adopted 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.

Strategic Environmental Assessment

- 6.13 The Neighbourhood Plan (General) (Amendment) 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.
- 6.14 In order to comply with this requirement, TSATC undertook a screening exercise in May 2023 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 concludes that the Plan is unlikely to have a significant effect on the environment and therefore does not require a Strategic Environment Assessment.

Habitats Regulations Assessment

- 6.15 BDC/BA prepared a Habitats Regulations Assessment (HRA) of the Plan in November 2019. It assesses the potential impact of the Plan's policies on the following protected sites:
- the Broadland SPA;
 - the Broadland RAMSAR; and
 - the Broads SAC
- 6.16 The HRA concludes that the neighbourhood plan will not give rise to likely significant effects on these protected sites, either alone or in combination with other plans or projects, and that Appropriate Assessment is not required.
- 6.17 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. None of the statutory consultees have raised any concerns about these matters. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of neighbourhood plan regulations.

Human Rights

- 6.18 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 is no evidence that has been submitted to me to suggest otherwise. 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 this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

- 6.19 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 The recommendations focus on the policies in the Plan given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 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 TSATC 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 respond to Planning Practice Guidance (ID:41-004-20190509) which indicates that neighbourhood plans should address the development and use of land.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan.
- 7.6 For clarity, this section of the report comments on all the Plan's policies.
- 7.7 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.

The initial parts of the Plan (Sections 1 to 5)

- 7.8 The Plan is well-organised and presented. It has been prepared with much attention to detail and local pride. It makes an appropriate distinction between the policies and their supporting text.
- 7.9 The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies. The Introduction sets the scene for the Plan. It properly identifies the Plan period (in paragraph 1.1) and the neighbourhood area (on Figure 1).
- 7.10 Section 2 comments about the way in which the Plan was prepared. The breakdown of events overlaps with the details in the Consultation Statement. It also comments about local planning policies which influenced the work on the Plan.
- 7.11 Section 3 provides information about the neighbourhood area. It provides interesting and comprehensive details which help to set the scene for the eventual policies.
- 7.12 Section 4 sets out The Vision for the parish as follows:

'In 2038, Thorpe St Andrew will be a socially and economically thriving community, which has retained its individuality, culture, and identity.'

- 7.13 Section 5 sets out the following Objectives:

'Natural Environment Objective -to protect and enhance the natural landscape of the town, including key landscapes, natural habitats, and areas with nature conservation value.

Housing Objective - to promote well designed housing, protecting the amenity of those who live and work in Thorpe St Andrew

Transportation Objective - to strengthen the provision of public and sustainable transport options, while ensuring future development includes sufficient provision for private cars.

Economic Objective - to promote economic growth and safeguard existing employment sites, which will encourage more money to remain within the community and prevent the need for long commuting.

Community Facilities Objective -to provide for the health, education and leisure needs of the community, with readily accessible facilities.

Historic Environment Objective - to protect, enhance and strengthen the character and appearance of the Conservation Area and the historic buildings of Thorpe St Andrew.'

- 7.14 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

Policy Structure and Justification

- 7.15 In each case the policies are supported by an Intention and a Justification. The details included are proportionate to the policy concerned.
- 7.16 This approach helps all concerned to understand the way in which the Plan has been developed. This approach is best practice.

Policy 1: Protecting and enhancing the natural environment

- 7.17 This is a general policy which seeks to ensure that development proposals safeguard the natural environment. The policy makes specific reference to County Wildlife Sites, Local Nature Reserves, and sites of Geodiversity Value. The Intention and Justification set the scene for the policy. The former advises that Thorpe St Andrew natural environment will be protected, and opportunities will be sought for its maintenance and enhancement, increasing the benefits for residents and wildlife. The latter comments that the town has a higher-than-average tree cover, containing significant areas of woodland and retaining good specimens of individual trees. It also advises that some of these remain from the original woodland, which was once extensive, and some from field and boundary trees. The Plan comments that the abundance of street and mature garden trees gives Thorpe St Andrew its special character.
- 7.18 The policy also proposes a series of Local Green Spaces (LGSs). They are assessed against the national criteria for such designations in Appendix B of the Plan.

- 7.19 As submitted the policy has a confusing format. This stems from the way in which it conflates the protection of natural environment with the designation of LGSs. Whilst there is a degree of overlap between the two issues, the submitted policy does not bring the clarity required by the NPPF. This conclusion is reinforced given that the two elements of the policy have different effects and the LGS part needs to follow the approach for such designations as set out in the NPPF. As such I recommend that the policy is restructured so that it addresses these two matters in separate elements.
- 7.20 In this context, I also recommend detailed modifications to the opening element of the part of the policy on the natural environment to ensure that it has regard to national policy and can be implemented by the two planning authorities in the development management process with clarity and certainty.

Local Green Spaces

- 7.21 The policy proposes a package of LGSs. The supporting text highlights the overlaps between the proposed LGSs, the conservation area and other environmental protections. I looked at the various LGSs as best as I could during the visit.
- 7.22 I sought commentary from TSATC on the extent to which it had assessed the need for LGS designation for those parcels of land which are within the conservation area. In its response to the clarification note TSATC advised that:

'the identified LGS within the Conservation Area include 15, 11, 16, 13 and 6. They range in terms of character, some being well treed and others being more open. LGS designation provides a greater degree of protection (as strong as Green Belt) for the spaces to remain in their current undeveloped form, which is key to their value to the community. Conservation Areas are defined as "an area of special architectural or historic interest, the character of which it is desirable to preserve or enhance" 1 is a designation that focuses more on historic attributes and significance of an area as a whole– whilst the proposed LGS are inside the CA, they are not the reason for its designation – much of that will relate to the built form and heritage of the area. Conservation Area designation is a weaker protection than LGS and could result in the loss of those spaces if development were proposed on them. The Town Council's concern would be that in determining an application for development that would affect one of the proposed spaces, the judgement to be made will concern the impact upon the significance of the Conservation Area as whole rather than the loss of the space itself.'

- 7.23 On the balance of the evidence, I am satisfied that the proposed designation of LGSs has properly considered this matter and reached an appropriate judgement.
- 7.24 I have also considered the size of the proposed Belmore Plantation, Brown's Plantation, Cary's Meadow, St George Morse Park, Fitzmaurice Park, and Thorpe Ridge LGSs. I have also taken account of TSATC's response to the question on this matter in the clarification note. On the balance of the evidence, I am satisfied that they are local in character and not extensive tracts of land. I have reached this judgement based on the size of the individual sites concerned rather than the overall proportion of the neighbourhood area which the LGSs occupy (as suggested by TSATC).

- 7.25 Detailed objections to the proposed designation of LGS 11 (Weston Pits), 15 (Thorpe Ridge) and 16 (Weston Wood) were received from BDC (LGS 11/15), Berliet Limited (LGS15) and WW Trott Plant Hire Limited (LGS16).
- 7.26 In its representation BDC commented that:
- ‘outline planning permission was previously obtained for development of 231 dwellings across the Pinebanks and Langley North Sites (ref: 20160237), which covers a large part of proposed LGS 11 and 15, with elements of the proposed LGS designation appearing to overlay areas identified for development within the original outline permission. Since then, several amendments/reserved matters applications have been made on the site. It should also be noted that a Lawful Development Certificate for an Existing Use or Operation (CLEUD) pursuant to planning permission ref: 20160237 was granted on the site in 2018 (planning ref: 20181334). In addition, in 2021 three new outline planning applications (listed below) were submitted to the Council which largely relate to the land of the previously approved site, but which also include new land to the south known as ‘Langley South’. Whilst these applications have been submitted separately, they are interlinked. Although the applications have not yet been determined (note they are pending due to the Nutrient Neutrality issue), the Council is working closely with the agent/developer on these applications as they continue to progress.’*
- 7.27 Similar evidence on the planning application history on the proposed LGS 15 was also submitted by Berliet Limited.
- 7.28 Taking account of all the information I recommend that proposed LGSs 11 and 15 are deleted from the Plan. There is an active history of planning permissions being granted on the parcels of land. In this context, Planning Practice Guidance (ID: 37-008-20140306) advises that ‘Local Green Space designation will rarely be appropriate where the land has planning permission for development. Exceptions could be where the development would be compatible with the reasons for designation or where planning permission is no longer capable of being implemented.’
- 7.29 C A Trott (Plant Hire) Limited made a detailed objection to the proposed designation of LGS16 (Weston Wood). It addresses the size of the site and the extent to which it is demonstrably special to the local community and holds a particular significance. In this context I assess the proposed LGS against the three criteria in paragraph 102 of the NPPF.
- 7.30 I am satisfied that the proposed LGS being in reasonably close proximity to the community it serves. It is adjacent to the residential areas to the east and the west. I am also satisfied that it is local in character (at 2.7 ha) and not an extensive tract of land. I am satisfied that it is sufficiently distinct from LGS 11 and 15 to be assessed on this matter in its own capacity.
- 7.31 Appendix B advises that the proposed LGS ‘contributes to the overall green character of the parish and forms part of a wider ecological corridor in the parish. It has a biodiversity, visual and communal value.’ I have considered this matter very carefully. On the balance of the evidence, I am not satisfied that the proposed LGS is

demonstrably special to a local community and holds a particular local significance. Whilst the area has some ecological value, there is no evidence to suggest that the value is sufficiently important to warrant LGS designation. In all the circumstances I recommend the deletion of the proposed LGS.

The other proposed LGSs

- 7.32 On the basis of all the information available to me, including my own observations, I am satisfied that the other proposed LGSs comfortably comply with the three tests in the NPPF. In several cases they are precisely the type of green space which the authors of the NPPF would have had in mind in preparing national policy. The River Green is the obvious example.
- 7.33 In addition, I am satisfied that their proposed designation would accord with the more general elements of paragraph 101 of the NPPF. Firstly, I am satisfied that the designations are consistent with the local planning of sustainable development. They do not otherwise prevent sustainable development coming forward in the neighbourhood area and no such development has been promoted or suggested. Secondly, I am satisfied that the LGSs are capable of enduring beyond the end of the Plan period. They are an established element of the local environment and have existed in their current format for many years. In addition, no evidence was brought forward during the examination that would suggest that the proposed LGSs would not endure beyond the end of the Plan period.
- 7.34 The map showing the proposed LGSs is of a scale which does not identify their boundaries. This will hinder the efficient operation of the development management process. I recommend that this matter is remedied by the production of plans at a more detailed scale within the overall context of Appendix B. I also recommend modifications to paragraph 7.8 to ensure that it has the clarity required by the NPPF.
- 7.35 I recommend consequential modifications to the supporting text and to the map to take account of the recommended deletion of three of the proposed LGSs. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

Replace the policy with:

‘Development proposals should protect and, where practicable, enhance existing environmentally important sites for their openness, their undeveloped character and/or their geodiversity or biodiversity value. Development proposals in the following areas of local importance (which include County Wildlife Sites, Local Nature Reserves, and sites of Geodiversity Value) will only be supported where they are consistent with the relevant designation of the site:

- **Racecourse Plantation (County Wildlife Site);**
- **Thorpe Island (Broads Authority Executive Area, Open Space in the BLP and Tree Preservation Order); and**
- **Thorpe Marshes/St Andrew Broad (Broads Authority Executive Area and Local Nature Reserve).**

The Plan designates the following areas as Local Green Spaces:

- **Belmore Plantation**
- **Brown's Plantation**
- **Cary's Meadow (Broads Authority Area)**
- **River Green (Broads Authority Area)**
- **Sir George Morse Park**
- **Gargle Hill**
- **Woodland Fitzmaurice Park**
- **Laundry Lane Tree Plantation**
- **Chapel Lane Pit/South Avenue Dell (Candidate County Geodiversity Site)**

Development proposals for local green spaces will only be supported in very special circumstances.'

Renumber the various sites in the policy (and on the associated Map)

Remove LGSs 11,15 and 16 from the Map

In paragraph 7.6 delete the references to footpaths 6 and 7.

Replace paragraph 7.8 with: 'River Green is identified as open space within Policy TSA5: River Green Open Space of the Broads Local Plan 2019, and Cary's Meadow is identified as an area to be conserved and enhanced for its contribution to landscape, wildlife, and recreation in Policy TSA1. In addition, Policy GT2 of the Growth Triangle Area Action Plan (GTAAP) identifies the primary Green Infrastructure corridor within the area which includes several of the spaces identified in Policy 1 of this Plan'

Policy 2: Creating a strong sense of place

- 7.36 This policy sets out the Plan's approach to design and character. It comments that new development will be well-designed to complement the character of the area of Thorpe St Andrew in which it is to be located and reflect its local distinctiveness as set out in the accompanying Thorpe St Andrew character statement (Appendix A). Its intention is to promote good and appropriate design which is sympathetic to the character of the town.
- 7.37 The policy includes a series of design principles.
- 7.38 In the round I am satisfied that the policy takes a positive approach to this matter. In addition, it is an excellent local response to Section 12 of the NPPF.
- 7.39 Norfolk Constabulary offers support to the policy and the way in which it addresses the issue of Secured by Design.
- 7.40 Within this overall context I recommend the following modifications to the format and structure of the policy to bring the clarity required by the NPPF:
- a reconfiguration of the first part of the policy;
 - the inclusion of a greater element of clarity on the definition of the eastern part of the neighbourhood area in the second part of the policy; and

- the introduction of a proportionate element into the opening element of the third part of the policy to acknowledge that not all the criteria will apply to each development proposal.

7.41 BDC and the BA make detailed comments on the criteria in the third part of the policy. In the round, I am satisfied that the range of criteria is appropriate. Whilst not all the criteria are distinctive to the parish, they provide a wider context for the application of the policy. In addition, the comprehensive nature of the criteria will avoid any misinterpretation by the development industry about the issues which need to be addressed in the neighbourhood area, and a wider reference to other plans and documents.

7.42 I recommend detailed modifications to criterion f) and g) based on the representations received from BDC. In each case they will bring the clarity required by the NPPF for development control purposes. Their effect remains unchanged. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

Replace the first part of the policy with: ‘Development proposals should be well-designed and complement the character of the area of Thorpe St Andrew in which it is to be located and reflect its local distinctiveness as set out in the Thorpe St Andrew character statement.’

Replace the first point in the second part of the policy with ‘The area to the east of Woodside Road, in which there is a transition from the urban to the rural, and acts as a ‘gateway’ to the City and to the Broads.’

Replace the opening element of the third part of the policy with: ‘As appropriate to their scale, nature and location, development proposals should:’

Replace criterion f) with: ‘Use appropriate boundary treatments including walling, hedging and new tree planting which respect and reinforce the character of the area and ensure that development edges are visually attractive.’

Replace criterion g) with: ‘Incorporate measures which will help to offset or mitigate climate change and which minimise visual impact.’

Policy 3: Connectivity and ensuring adequate car parking

7.43 This is a wide-ranging policy which addresses the following matters:

- the delivery of sufficient on plot parking to accommodate the needs of residents and to minimise the need for additional on street parking, provided either at the rear, front or side of the property. Street layouts should seek to orientate dwellings onto pedestrian routes and encourage walking to local services;
- the development of a cycling and walking friendly neighbourhood by applying highway design principles which should not prioritise the movement function of streets at the expense of quality of place;

- the provision of pedestrian and cycle routes which are well connected, well designed, safe to use and suitable for a range of users including those with limited mobility.
- 7.44 The intention of the policy is to ensure adequate car parking provision and promote pedestrian routes.
- 7.45 Part of the justification for the policy advises that ‘the narrow roads and high transit routes within the town, which acts as an urban/rural gateway, means that off- street car parking is a priority. This is further evidenced by the Norfolk County Council Transforming Cities funding application, which identified on-street car parking in Thorpe St Andrew causing pinch points that delays traffic, particularly buses, and creates difficult cycle conditions.’
- 7.46 I saw first-hand during the visit some of the pinch points and the associated delays in the free and safe flow of traffic. Nevertheless, as submitted, the policy’s intentions are unclear, and there is a degree of conflict between the various criteria. In addition, Thorpe St Andrew is well-connected in public transport and cycling terms to Norwich city centre and other major employment area. As such, the justification for high levels of parking is not clear from the supporting text. Moreover, the policy is focused on new residential development, whereas some of the more acute parking problems are related to the daily operation of existing schools and businesses. In this context it is unclear how the implementation of the policy would assist in the resolution of the on-street parking issues. Furthermore, national planning policy is clear that new developments should not be expected to resolve existing parking and congestion issues.
- 7.47 Taking account of all these matters, I recommend that the policy is recast so that its focus is on the development of new residential areas which incorporate high quality pedestrian environments with layouts which connect with pedestrian and cycling facilities. I also recommend that this approach is applied on a proportionate basis as the policy’s contents may not always be practicable. I recommend that the parking requirements are modified so that they relate to Norfolk County Council standards. As submitted, the policy would result in significant issues with delivering appropriate densities and would have the potential to result in an inefficient use of land.
- 7.48 I also recommend consequential modifications to the supporting text. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

Replace the policy with:

‘As appropriate to their scale, nature and location, proposals for new housing developments should incorporate:

- **the development of streets which focus on the quality of place and where street layouts orientate dwellings onto pedestrian routes;**
- **pedestrian and cycle routes which are well-connected, well-designed, safe to use and suitable for a range of users including those with limited mobility; and**

- **off-street parking spaces to the most up to date County Council standards to maintain a pleasant visual environment and avoid streetscapes that are dominated by cars.'**

Replace paragraph 9.4 with:

'Policy 3 has a focus on promoting the development of new residential areas which have a high-quality pedestrian environment with layouts which connect with pedestrian and cycling facilities and with parking requirements to County Council standards.'

Policy 4: Protecting residential amenity

- 7.49 This policy sets out to protect and preserve the amenity for current and future householders and neighbouring residents. It comments that the development of new housing close to existing homes shall seek to safeguard existing levels of amenity through ensuring that the height of new residential buildings or extensions is compatible with and respects the surrounding residential area and does not impact on the amenity of adjoining properties, and promoting the 'open feel' of streets at the front of existing houses where appropriate, with new front gardens provided that are of a similar size to those enjoyed by existing development. The policy also lists a series of matters which such proposals should address.
- 7.50 BDC comments that criteria a) to k) in the second part of the policy have significant overlap with existing national and local planning policy, and with other regulatory regimes and that the policy does not appear to add anything locally distinctive to the existing development plan. I sought TSATC's comments on this matter. In its response to the clarification note it agreed that the policy should be restructured in general, and to avoid listing a series of material planning considerations. I recommend that the policy is recast so that it has a format which is distinctive to the parish. I recommend that the list of material considerations is relocated into the supporting text. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

Replace the policy with: 'Development proposals for new housing should safeguard the amenity of existing housing in the immediate locality by:

- **ensuring that the height of new residential buildings or extensions is compatible with and respects the surrounding residential area; and**
- **promoting the 'open feel' of streets at the front of existing houses and providing new front gardens that are of a similar size to those in the immediate locality.'**

At the end of paragraph 10.4 add: 'Policy 4 addresses these important matters. Developers should address amenity issues at an early stage including light/shadow, odour, dust, vibration, and noise, overlooking, overshadowing. In addition, development proposals should incorporate the provision of satisfactory and useable external amenity space.'

Policy 5: Residential Mooring

- 7.51 This is a very distinctive policy. It comments that the development of new moorings for residential boats, alterations to, or replacement of an existing residential boat or the construction of jetties, platforms and sheds associated with residential boat moorings should meet a series of criteria.
- 7.52 The policy takes a positive approach to this matter and has attracted local support. Within this context, I recommend that the policy is modified so that its intentions are clearer and to ensure that the criteria more naturally flow from the initial element. I have considered carefully the comments from the Broads Authority about the number of car parking spaces required for such development. On the balance of the evidence, I recommend that the car parking requirement is modified to one parking space for each new mooring. Whilst I understand the approach taken by TSATC, I am not convinced that there is a direct relationship between the number of berths on a boat and the number of car parking spaces required. In addition, the planning process cannot control the size of boat or boats which uses the mooring provided. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

Replace the policy with:

‘Proposals for the development of new moorings for residential boats; alterations to, or replacement of existing residential boat moorings; and the construction of jetties, platforms and sheds associated with residential boat moorings should:

- **respect the natural or historic environment and be designed to ensure that they do not have an unacceptable impact on those environments;**
- **retain the open character of their immediate environments and maintain the existing wide views across the River Yare;**
- **provide suitable waste disposal facilities;**
- **provide safe and suitable access for emergency service vehicles; and**
- **provide one car parking for each new mooring.’**

Policy 6: Promoting and protecting employment

- 7.53 This policy has two related parts. The first seeks to retain employment uses in three defined areas. The second comments that major new residential development should include appropriate provision for retail, employment uses and live-work units to meet the day to day needs of residents and businesses and to ensure the sustainability of new communities.
- 7.54 The intention of the policy is to retain, promote and enhance economic growth and diversity to support a wide range of employment and that development and growth will ensure that the economic and aspirational needs of the community are supported.

7.55 BDC makes the following comments on the policy:

'It is not clear from this policy how it would be determined that an existing employment area does not 'remain viable' (first sentence). It would not be reasonable if the loss of units was resisted indefinitely, and the policy is therefore not effective without any mechanism for assessing applications which result in the loss of the identified employment/commercial premises. This issue needs to be addressed in order to meet the NPPF requirement of contributing to the achievement of sustainable development (para. 16 a)). The Broadland Development Management DPD Policy E2 looks at the Retention of employment sites and Para 5.18 details a mechanism for demonstrating viability which could be useful in this regard.'

7.56 I have considered these comments carefully. I have also taken account of the responses made by TSATC to this matter in the clarification note. I recommend modification to both elements of the policy to bring the clarity required by the NPPF

7.57 I recommend that the first part of the policy identifies the employment areas and incorporates the criteria from the Broadland Development Management DPD (Policy E2) on the potential loss of existing employment-generating uses.

7.58 In the second part I recommend the deletion of the unnecessary supporting text and its relocation into the substantive supporting text.

7.59 I also recommend consequential modifications to the supporting text. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

Replace the policy with:

'The Plan defines the following employment areas (as shown on Map [insert number]):

1) North: Retail service, and hospitality businesses clustered on Thunder Lane, Plumstead Road and South Hill Road

2) South: Smaller business units and hospitality along Yarmouth Road, Bungalow Lane, Gordon Avenue and on St Williams Way

3) East: Sainsbury's supermarket retail area, larger mixed-use units at the St Andrews Business Park, and Griffin Lane

Development proposals which would involve the loss of employment related activities in these areas will not be supported unless:

- **it can be demonstrated that the existing use is not viable; or**
- **significant environment or community gains arise from the proposed redevelopment or change of use which outweighs the benefits of retaining the existing use**

Major new residential development should include appropriate provision for retail, employment uses and live-work units to meet the day to day needs of

residents and businesses and to ensure the sustainability of new communities. Where practicable, such developments should cluster these uses together to create mixed use areas.'

At the end of paragraph 12.1 add: 'These areas are shown on Map [insert number]. The second part of the policy comments about the need for commercial uses to support major new residential developments. This approach will allow the sharing of buildings, and facilities which will help to improve the sustainability of the businesses and create opportunities for building efficiency and energy efficiency.'

Policy 7: Retaining and creating community facilities

7.60 This is a wide-ranging policy on community facilities. It includes the following elements:

- new development should be supported by the appropriate levels of community infrastructure which meets the needs of new residents /communities without detriment to the services enjoyed by existing residents/communities;
- offering support for the improvement, enhancement, and extension of current community facilities;
- the construction methods and furnishing of community buildings will be encouraged to minimise energy and water use and promote the use of alternative energy sources; and
- proposals that would result in any loss of community facilities will not be supported unless they meet certain criteria

7.61 The Plan advises that the policy's intention is to improve health and quality of life. It also comments that community uses are defined as local shops, meeting places, sports venues, open spaces, cultural buildings, public houses, and places of worship.

7.62 The policy addresses a series of important issues. However as submitted its format is somewhat confused. I recommend that its structure is modified so that it will have two separate parts. The first would relate to existing community facilities (largely the second and fourth parts of the policy). The second would be a requirement for other development to support community infrastructure (largely the first part of the policy). I also recommend that the third part of the policy is modified so that it refers only to land use planning matters. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social dimension of sustainable development.

Replace the policy with:

'Proposals for the improvement, enhancement, and extension of existing community facilities will be supported.

Proposals that would result in any loss of existing community facilities will not be supported unless:

- **it can be demonstrated that the facilities are no longer needed or viable;**
or
- **it can be demonstrated that suitable alternative provision, with appropriate capacity already exists in an equally accessible location; or**

- **suitable alternative provision will be delivered by new development in an equally accessible location.**

Proposed new development should be supported by appropriate levels of community infrastructure which meets the needs of the wider community without having a detrimental effect on existing community services. New play areas and public open spaces should be located close to community hubs, and other community buildings such as schools. Such spaces should be easily and safely accessible from residential areas, by pedestrians and cyclists and those with limited mobility. Wherever practicable, new green spaces should link with existing areas of green infrastructure to create ecological networks and biodiversity net gain.

Wherever practicable, the construction methods of community buildings should minimise energy and water use and promote the use of alternative energy sources.'

Policy 8: Protecting the historic environment

- 7.63 This policy comments that development proposed within the Conservation Area, or within the curtilage of a listed building, scheduled monument, or non-designated asset (as identified in Appendix C) should minimise the impact on these assets. Its intention is to secure the enhancement and protection of nationally and locally significant buildings
- 7.64 As submitted the policy addresses a range of heritage assets. Some are designated and others are not. As submitted the policy does not add any value beyond the contents of national and local policies on designated assets.
- 7.65 In this context I recommend that the focus of the policy should be on the identification of the non-designated heritage assets listed in Appendix C and the promotion of a policy for their protection having regard to national policy. I am satisfied that the non-designated heritage assets are appropriate and have been carefully-selected. This approach was agreed by TSATC in its response to the clarification note. I also recommend that the policy is supported in a more definitive fashion by the deletion of the references to 'indicative' in both the supporting text and Appendix C. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

Replace the policy with:

'The Plan identifies a series of non-designated heritage assets (as described in Appendix C).

Development proposals affecting the identified non-designated heritage assets should

- **demonstrate that they have avoided or mitigated harm to the significance of the asset(s) through the design of the development; and**

- **conserve the setting of the asset(s) and any aspect which contributes to their significance;**
- **wherever practicable, enhance enjoyment of the historic environment.**

In paragraph 13.5 replace the second and third sentences with: 'They are listed in Appendix C.'

In Appendix C delete 'Indicative' from the underlined heading for the non-designated heritage assets.'

Monitoring and Review

- 7.66 Section 15 of the Plan addresses the monitoring and review process in a positive way. This is best practice.
- 7.67 Section 5 of this report and the Basic Conditions Statement have commented about the relationship between the submitted Plan and the emerging local plan for the Greater Norwich area. Given the importance of the adoption of the emerging plan on the planning policy context in the neighbourhood area I recommend that paragraph 15.3 of the Plan is expanded so that it provides guidance to residents and the development industry alike about the way in which the Plan will respond to the adoption of that Plan.
- 7.68 The language used in the recommended modifications acknowledges that in the same way that there is no requirement for a town council or parish council to produce a neighbourhood plan, there is no requirement for those organisations to review a 'made' neighbourhood plan. Nevertheless, the recommended wording has been designed to recognise that where there is a conflict between different elements of the development plan, the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan. Plainly a review of a made Plan will have the ability to keep its contents up-to-date and to be aligned to the wider development plan throughout the Plan period.

At the end of paragraph 15.3 add:

'Any neighbourhood plan operates within the wider context provided by national planning policy and local planning policy. The Town Council will monitor and assess the implications of any changes to national or local planning policy on the Plan throughout the Plan period. Where necessary it will consider the need for a partial review of the Plan.'

The eventual adoption of the Greater Norwich Plan could bring forward important changes to local planning policy. In this context the Town Council will assess the need or otherwise for a full or partial review of the neighbourhood plan within six months of the adoption of that Plan.'

Other Matters - General

- 7.69 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 because 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 because of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters. It will be appropriate for BDC/the BA and TSATC 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 and to accommodate any administrative and technical changes.

Other Matters – Specific

- 7.70 BDC and the BA has made a series of helpful comments on the Plan. I have included them in the recommended modifications on a policy-by-policy basis where they are required to ensure that the Plan meets the basic conditions.
- 7.71 I also recommend other modifications to the text of the Plan based on BDC's comments insofar as they are necessary to ensure that the Plan meets the basic conditions. In the main they will bring the Plan up-to-date. Other matters relate to the more general elements of the Plan.
- 7.72 The BA also highlights a range of typographic changes to the Plan. It would be entirely appropriate for these corrections to be incorporated into the referendum version of the Plan.
- 7.73 The numbering on the Contents Page has a series of inaccuracies. I recommend accordingly.

Modification of general text to update the Plan based on BDC's comments on paragraphs 1.7/1.8/3.6/3.7/3.10.

Correct typographical errors throughout the Plan.

Revise the page numbering sequence on the Contents Page.

8 Summary and Conclusions

Summary

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2038. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to safeguard the character and setting of the neighbourhood area and to designate a series of Local Green Spaces.
- 8.2 Following the independent examination of the Plan, I have concluded that the Thorpe St Andrew Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood development plan subject to a series of recommended modifications.

Conclusion

- 8.3 On the basis of the findings in this report, I recommend to Broadland District Council and the Broads Authority that subject to the incorporation of the modifications set out in this report that the Thorpe St Andrew Neighbourhood Development Plan should proceed to referendum.

Other Matters

- 8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved on 28 April 2017.
- 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 responses to the clarification note were detailed, informative and delivered in a very timely fashion.

Andrew Ashcroft
Independent Examiner
6 December 2023