Formal comments on the draft *Neighbourhood Planning (Referendums) Regulations 2012*

1. Introduction

1.1. This is the formal response from the Association of Electoral Administrators (AEA) to the DCLG invitation for comments on the draft *Neighbourhood Planning (Referendums) Regulations 2012*.

1.2. The Association of Electoral Administrators (AEA) was founded in 1987 and has since established itself as a professional body to represent the interests of electoral administrators in the United Kingdom. It is a non-governmental and non-partisan body and has 1712 members, the majority of whom are employed by local authorities to provide electoral registration and election services.

1.3. The AEA encourages and provides training and education in electoral administration, in addition to a range of commercial and professional services.

1.4. The key aims of the AEA are to:

- contribute positively to electoral reform within the UK;
- foster the advancement of consistent and efficient administration of electoral registration and the conduct of elections in the UK;
- raise the profile of electoral administration both within the UK and internationally;
- enhance and maintain the AEA’s reputation as the leading professional body for electoral administrators within the UK.

1.1. The AEA supports and advocates two key principles set out by Gould\(^1\) in his report on the 2007 elections in Scotland, namely that:

- All those with a role in organising elections should consider the voters’ interests above all other considerations; and
- Electoral legislation should not be applied to any election held within six months of the new provision coming into force.

---

1.5. We would expect there to be a period of six months from the date the draft 
Neighbourhood Planning (Referendums) Regulations 2012 are made before the 
poll at a referendum under those regulations is held. This would be in line with 
the Gould recommendation to allow time for the necessary planning to be 
undertaken.

1.6. Given the short time allowed for comments on the draft Neighbourhood 
Planning (Referendums) Regulations 2012 and associated forms and notices, 
this response cannot be taken as a comprehensive check on the drafting of the 
proposed legislation or on any omissions. Where we have been able to identify 
potential errors or omissions, we have included comments to that effect.

1.7. We do not comment in this response on the merits or otherwise of 
neighbourhood planning referendums. In addition, we do not comment on the 
provisions relating to referendum campaign expenses other than where there 
is an implication for the administration of the referendum. Our focus is on the 
administration of these referendums as provided for in the draft regulations.

1.8. In this response we refer to the draft Neighbourhood Planning (Referendums) 
Regulations 2012 as ‘the draft regulations (residential)’, and the draft 
Neighbourhood Planning (Residential) Referendums Rules as ‘the draft rules’.

2. Overarching issues

2.1. There are a number of key issues which provide the context within which this 
response is provided. Our detailed comments on the regulations follow.

A partial view of the arrangements

2.2. The AEA welcomes the opportunity to comment on the draft regulations 
(residential). However, these form one part of the whole picture relating to the 
administration of neighbourhood planning referendums. We understand that 
there are to be a set of regulations and rules for the ‘neighbourhood business 
area’ referendums, referred to in the draft regulations (residential) as 
‘additional referendums’ [defined in the Localism Act 2011, Schedule 10, 
15(1)];

"The additional referendum ... must be held on the making of a 
neighbourhood development order if the draft order relates to a 
neighbourhood area that has been designated as a business area under 
section 61H."

2.3. We have not yet seen the draft regulations and rules for the ‘additional 
referendums’ but would welcome the opportunity to comment on these when a 
draft becomes available.
2.4. We note that there is provision in the draft regulations (residential) for there to be a combined form of the notice required by draft regulation 4(1) in the event that there is an additional referendum on the same plan or order. However, the provision in paragraph 2.2 above makes no mention of a plan. We question therefore the basis of the wording in the draft regulations. The Localism Act provides for the Secretary of State to make regulations about the combination of polls at neighbourhood planning referendums with those for other referendums (including the ‘additional referendums’) or with the polls ‘at any election’ [Schedule 10, 16(2)(k)]. We comment on the wider ‘combination’ issue below. However, we would welcome the opportunity to comment on any proposed combination arrangements when draft regulations become available.

2.5. Given that we are commenting here on one part of the whole set of arrangements pertaining to neighbourhood planning referendums, we reserve the right to comment further when the other parts become available or to amend accordingly any view provided in this response.

Combination

2.6. The AEA is concerned about the increasing presumption that any number of polls can be combined and held on the same day. Combining polls has significant administrative implications both for administrators and for voters. The issues being presented in a neighbourhood planning referendum may not be straightforward for voters in that they require voters to have an understanding of a wide range of available material, and the proposals may in some circumstances be contentious locally. Careful consideration will need to be given to the implications of combining the polls at neighbourhood planning referendums with other polls (which could be in relation to ‘any election’ or other referendums) taking place on a particular day. These could be the polls at local government elections, a national referendum, or a General Election, either UK or European in addition to several other polls such as by-elections, PCC elections etc. Given the possible nature of neighbourhood planning referendum, the issue of boundaries is a critical one in terms of adding complexity to an already complex process.

2.7. We expect that any combination provisions brought forward in relation to voting at a neighbourhood referendum and at other polls on the same day will ensure an accessible approach to postal voting whereby a voter applying for a postal vote at one electoral event will automatically receive a postal vote for any other polls at which they are eligible to vote, and vice versa.

2.8. Administratively, combination results in increased complexity impacting on all parts of the process from the design and despatch of poll cards and voting stationery particularly for postal voters, as well as the arrangements for
polling stations and for the verification and count. All of these require additional staffing in order to administer the revised processes. Printing contractors have advised administrators that there are limitations in terms of the number of ballot papers that can be included in a ‘combined’ postal voting pack. In addition, where there are combined polls with different franchises this needs to be managed in order to ensure that the correct information and stationery reaches only those eligible to vote in a particular poll.

2.9. In our report on the referendums and elections in 2011\(^2\), the AEA highlighted many issues relating to the combination of polls and called on the UK Government to review this issue. We have yet to see any joined-up policy on combination across Government departments, and the matter remains urgently in need of review particularly given the potential combination of polls at scheduled elections in 2015. One assumes from the provision in the Localism Act cited above, that there might also be any number of these neighbourhood planning referendums also taking place on 7 May 2015 which will also be the day on which large numbers of parish and town council elections take place across England. The AEA is extremely concerned that the presumption of combination will break the capacity of administrators to deliver those polls. We again call on the UK Government to urgently review the issue of combining polls and the cycle of elections to arrive at workable arrangements both for Returning and Counting Officers, but also in the interests of voters. For this reason we have also sent this response to officials at the Cabinet Office.

**Prescribed forms and notices**

2.10. The forms prescribed in the draft regulations (residential) have been drafted, we believe, to be consistent with existing forms within other election rules.

2.11. However, for the Police and Crime Commissioner (PCC) elections to be held in November 2012, the Home Office have prescribed a more accessible set of forms building on the work undertaken by the Electoral Commission for the Wales and UK-wide referendums in 2011. These forms will also apply to future PCC elections.

2.12. Whilst we welcome the initiative to provide more accessible and well-designed forms and notices, this unilateral arrangement will result in inconsistency across elections and referendums which will be particularly acute in the event of the combination of polls or where multiple polls are held on the same day. This cannot be in the interests of voters who ought to be able to expect consistency in the way in which information is presented to them in order to

support their understanding of what they need to do and the choices presented to them in relation to each poll.

2.13. These different approaches have the potential to result in voters receiving voting stationery in different formats for different polls on the same day and will make combining some stationery, such as postal votes, impossible.

2.14. The AEA calls on the UK Government to ensure the consistency and accessibility (through usability testing) of all prescribed election and referendum forms and notices across all types of elections and referendums. There will need to be some provision for forms to be amended ‘so far as circumstances require’ to reflect local production logistics and any required designs should be made available in formats that can be readily used by printers.

3. The trigger for the referendum to be held

3.1. In order to commence the proceedings set out in the draft regulations (residential) and the rules contained within these regulations, the Counting Officer needs to be informed that a referendum has been triggered.

3.2. We understand that the process for triggering a referendum is set out in the Localism Act 2011, in that an examiner must make a report on a draft neighbourhood planning order and that this report may contain a recommendation that the draft order is submitted to a referendum. In addition, if the report recommends that the draft order is submitted to a referendum, it must also make a recommendation as to whether the area for the referendum should extend beyond the neighbourhood area to which it relates and what that area should be [Schedule 10, 10]. Schedule 9, part 2, 7(3) applies similar arrangements for the examination of proposed neighbourhood plans and provision for holding referendums on these.

3.3. The local planning authority (‘the authority’) then considers the recommendations made by the examiner and, where the authority is satisfied that the draft order meets certain prescribed conditions (with or without modifications) a referendum must be held [Schedule 10, 12(4)]. The area in which the referendum is (or referendums are) to be held must, as a minimum, be the neighbourhood area. The decision as to whether to extend the area for the referendum rests with the authority and if they decide to do so they must publish a map of the area, and send a copy to the ‘qualifying body’ [a parish council or an organisation designated as a neighbourhood forum - see Schedule 9, 2, 61E (6)] and ‘such other persons as may be prescribed’.

3.4. In the draft regulations (residential), in regulation 4, there is provision for the ‘proper officer’ to publicise via a notice, 56 days before the date of the
referendum, ‘to bring to the attention of persons who are entitled to vote in the referendum’ a statement that a referendum will be held and details of the question, the referendum area and whether an additional referendum is to be held as well as a description of the persons entitled to vote in each referendum. This notice must also inform those entitled to vote in the referendum where they may view the documents listed in the regulation including the examiner’s report and a statement by the authority that it is satisfied the order meets the various requirements (which we sincerely hope will be translated into plain language). If the referendum area comprises more than one ‘relevant council’ (or part thereof) then the notice must be published by the proper officer of each relevant council in the same manner and on the same date.

3.5. Clearly, in order for the proper officer to publish the notice at 56 days, he or she will need to have been in contact with the relevant electoral registration officer(s) in order to establish within any referendum area a ‘description of the persons entitled to vote in each referendum’.

3.6. We assume that the intention of regulation 14 requiring communication and cooperation between ‘proper officers’ of the local planning authority and the relevant council (or councils) is intended to ensure that the relevant electoral registration officer(s) and counting officer(s) are notified immediately the decision to hold a referendum has been made so that they can commence planning and provide any information required. If that is the case, we believe that the regulation should explicitly say so.

3.7. We also note that the definition of ‘relevant council’ is contained within the Localism Act 2011 [Schedule 10, 14(3)]. However, we cannot find a reference in regulation two of the draft regulations (residential) that the definition contained in the Localism Act 2011 applies. Is there a reason for this?

The referendum period and publicity

3.8. It is noted that the publication of the notice (required by regulation 4) 56 days in advance of the referendum would mean that a notice in respect of a referendum taking place on the same date as local government elections in May of any year would need to be published in early February of that year. We understand that the publication of this notice commences the ‘referendum period’ for the purpose of referendum expenses.

3.9. Regulation 5(2)(b) states that material cannot be published ‘by or on behalf of the relevant council, or the local planning authority for the referendum area’...‘during the period of 28 days ending with the date on which the referendum is held’. Regulation 4(1) sets out the notice at 56 days. So, could information be published between 56 days and 29 days?
3.10. We believe that Schedule 4(2) to the draft regulations (residential) applies S109 (payments for the exhibition of election notices) and S110 (details to appear on election publications) (RPA 1983) to any campaign material relating to the neighbourhood planning referendums.

4. **The question to be asked in a referendum**

4.1. The AEA has formally responded to the consultation by the Electoral Commission on the intelligibility of the proposed referendum questions which are set out in the draft regulations in Schedule 1 and in the prescribed forms of ballot papers in Schedule 3, Part 8 (Appendix of Forms). This response is attached as an Appendix to this paper.

4.2. We note that in the prescribed front of ballot paper forms in Schedule 3, there is no preamble included in the wording. We would welcome clarification as to how the information (preamble) included with the draft questions on which the Electoral Commission has consulted will be presented to voters to assist them in casting their vote.

4.3. The AEA assumes that the draft questions in Schedule 1 and the versions of the ballot papers included in Schedule 3 may be amended to reflect any recommendations by the Electoral Commission regarding the intelligibility of the proposed referendum questions.

5. **Detailed comments on the Neighbourhood Planning (Residential) Referendums Rules (Schedule 3)**

5.1. Regulation 4(1)(f)/(h) - ‘similar to those used at local government elections’ - We assume that this statement is intended to reassure voters that the process will be familiar and that the arrangements will be as for local elections with essential modifications given that these are referendums and not elections. On that basis, we welcome the inclusion of this statement.

5.2. Regulation 4(5) - refers to the relevant council ‘in whose portion of the referendum area the greater or greatest ... number of electors is registered’. This construction is repeated in regulation 10 setting out which counting officer would be the Chief Counting Officer (CCO) if the referendum area comprises any part of the area of more than one relevant council. It should be clear on the basis of which franchise this figure is to be calculated. We assume for residential neighbourhood referendums this will be the local government franchise, but matters are likely to be more complicated where a business neighbourhood area referendum is also taking place. This needs to be clearly set out in the Regulation.
5.3. Regulation 6(1) - definition of referendum expenses limit. Could the term ‘the aggregate of’ be made clearer?

5.4. Regulation 6(1)(b) - definition of ‘the relevant register’ refers to the revised version of the register published after the conclusion of the annual canvass in the year immediately preceding that in which the referendum is held. This does not take into consideration the monthly alterations to the register that may have taken place since the register was produced in the December and could alter the numbers on a register quite significantly. Also, what will happen in 2014 given that there will not have been an annual canvass in 2013 and there will be a canvass in the early part of 2014 and an amended (IER) canvass later in 2014?

5.5. Regulation 6(3) - the use of the term ‘without reasonable excuse’ is ambiguous. Is this to be defined and if so by whom and would that definition be binding in any way? For example, what if a campaign organiser did have a reasonable excuse - could they go over the limit and if so by how much and who would authorise this?

Schedule 3, Part 1 - Citation and interpretation

5.6. Rule 2(1) - ‘voter means a person entitled to vote on that person’s own behalf’. This definition differs from that given in the RPA 1983 (S202), namely that ‘voter’ means a person voting at an election and includes a reference to a person voting as a proxy. The new construction leads to some awkward wording elsewhere in the rules. For example, in rule 26(4) it refers to the voter or proxy secretly marking ‘the person’s ballot paper’ rather than marking ‘their’ ballot paper. In addition, ‘entitlement’ to vote does not mean that the elector has voted and, in so doing, become a ‘voter’.

Schedule 3, Part 2 - Provisions as to time

5.7. Rule 4 refers to the days mentioned in regulation 10(2)(a) to (c). In fact, the dies non are referred to in regulation 11(2)(a) to (c).

Schedule 3, Part 3 - General provisions

5.8. Rule 9(3) - there is no reference to a time limit before the same official mark may be used at a neighbourhood planning referendum again.

5.9. Rule 13(5) - differs from the Principal Areas rules in that ‘(as the case may be)’ is missing from the end of the line.

5.10. Rule 16(3)(a) - requires the name of the relevant council to be included on the official poll card. However, this is not consistently required for other notices and for the reverse of the ballot paper for example. It would be helpful if the
reason for this could be clarified to enable a discussion as to what local information is needed on the various forms and for what purpose.

5.11. Rule 17(5)(b) - the tactile device described in this rule will not be one that local authorities currently hold and, therefore, there will be a cost incurred in purchasing these devices which will need to be met. We would welcome clarification as to which authority meets the cost where the local planning authority and the relevant council are different or where there are a number of relevant councils within the relevant area.

Rule 17 - Polling observers and counting observers

5.12. Rule 18 provides for ‘polling observers’ and ‘counting observers’. We note that there is an inconsistency of language used for different referendums, for example the rules for the UK-wide referendum referred to ‘polling agents’ and ‘counting agents’ [Schedule 2, Part 1, rule 18], whereas the Local Authorities (Conduct of Referendums)(England) Regulations 2012 (‘the 2012 referendum regulations’) refer to polling and counting ‘observers’ [Schedule 3, Part 4, rule 18]. This use of the word ‘observer’ could blur the distinction between these ‘observers/agents’ representing a campaign organisation and those individuals and organisations which have registered with the Electoral Commission as ‘observers’ according to Sections 6A-6D of PPERA. In any event, there should be consistency across elections and referendums, and across different types of referendum.

5.13. We note that schedule 4, paragraph 2(k) modifies other legislation so that any references to the presence of agents in relation to anything requiring to be done in the presence of election, polling, counting or other agents is to be ignored. We assume that all such instances have been covered by alternative provisions, subject to our comments in paragraph 5.15 below.

5.14. This rule does not contain the usual provisions enabling the counting officer to limit the number of such observers/agents or the formula ensuring that each campaign group have an equivalent number of observers/agents. Nor is there provision to appoint a replacement should an observer/agent die or becomes incapable of acting.

5.15. We note the lack of provision for the appointment of one counting observer/agent to be designated at the count venue in order that they may be consulted by the counting officer to be given the opportunity to ask for a recount in the event, for example, that they have observed or have concerns about ballot papers being placed in the wrong bundles during the counting process. We note also that rule 37 provides for the counting officer to have the votes re-counted. We also note, from rule 42, that the Chief Counting Officer may direct a counting officer to have the votes re-counted.
5.16. Rule 18(4) refers to a ‘notice of nomination’. What is required to be included in such a notice and when must it reach the counting officer? We assume the notice must be in writing from references to it being sent by post or being delivered by hand, but can it also be sent by email? The equivalent provision in the 2012 referendum regulations referred to above, is as follows:

“A nomination under paragraph (3) must be made by notice in writing to the counting officer not later than the fifth day before the poll (disregarding any day which is to be disregarded by virtue of rule 4) and the notice must contain the address of each nominee.”

If the counting officer is to correspond with those individuals appointed as polling or counting agents, to send them the notice of secrecy for example, it will be necessary for the address of each nominee to be provided in the notice as set out above.

Schedule 3, Part 6 - Counting of votes

5.17. Rule 35 does not provide for a Chief Counting Officer to send a representative to attend the counting of votes where there are a number of relevant councils (or part thereof) within the referendum area.

5.18. Rule 36(3) provides for a postal ballot paper to be returned to any polling station in the referendum area. Will this also apply where there is more than one relevant council (or part thereof) within the referendum area? This provision is carried through to the wording of the postal poll card and the proxy postal poll card.

5.19. Rule 36(7) requires the counting officer to draw up a statement as to the result of the verification and for any counting observer to make a copy. If there was a designated agent for each campaign organisation (see comments in paragraph 5.14 above) they could be the recipient of a copy of the statement. In addition, we cannot find any provision for this statement to be provided to the Chief Counting Officer in the event that more than one relevant council is involved. Instead, a provisional combined verification and provisional result statement is set out in rule 42. This assumes, we believe, that the counting of the votes will take place immediately following verification. This arrangement may need to be revisited in the event of combination where in many cases the verification and count will need to take place at different times.

5.20. Rule 38(3) - this again relates to the point made earlier (in paragraphs 5.14 and 5.18 above) that the lack of a designated observer/agent leading to a situation where every counting observer has to be consulted on a doubtful
ballot paper when in reality this is normally done by consultation with one appointed agent for each campaign organisation.

Schedule 3, Part 7 - Declaration of result and disposal of documents

5.21. Rule 42(6) - in the event of a counting officer not proceeding with a re-count immediately after receipt of the Chief Counting Officer’s direction to re-count, this rule requires a counting officer to notify counting agents of the time and place at which ‘the Chief Counting Officer will begin to re-count the votes’. We assume that this is a drafting error and that it is not intended that the Chief Counting Officer takes on this role from the counting officer.

Schedule 3, Part 8 - Appendix of Forms

5.22. There is a general point about consistency of terms. The draft ballot papers refer to ‘marking a cross [X] in the box next to your choice’ whereas the instructions on the ‘Instructions to the person voting’ and on the back of the poll cards refer to marking ‘a cross [X] in the box on the right hand side of the answer of your choice’. This is a clear demonstration of why the design of a ballot paper must be taken within the context of other instructions and information provided to voters.

5.23. We do not understand why ‘the instructions to the voter’ have been renamed ‘instructions to the person voting’ other than an intention to encompass the situation where a person is voting as a proxy for the voter. (This is reflected in the revised ‘Guidance for voters’ which now also refers to ‘and proxies’.) This revised wording should be subject to usability testing (see our comments in paragraphs 2.9 - 2.13 above).

5.24. Instructions to the person voting - instruction number 5 refers to the ‘small’ envelope marked A, and instruction number 7 refers to the ‘larger’ envelope marked B. The difference in size is more evident where there are separate envelopes but may be less so where a one-piece mailer is used. Therefore, it may be clearer for voters and more flexible for administrators simply to refer to the envelope marked A and the envelope marked B.

5.25. The official proxy poll card (to be sent to an appointed proxy voting by post) should be re-titled, ‘official proxy postal poll card’ (as is the case at other elections) to make the distinction clearer.

Schedule 4 - Application, with modification, of other Acts and subordinate legislation, Table 1

5.26. The modification of S96 (RPA 1983) allows for ‘any person’ being entitled to use a meeting room free of charge to promote a particular result in the referendum. Our reading of this provision is that there is no limitation or
definition of ‘any person’. How can this be controlled in terms of the person being genuinely involved in campaigning in the referendum? Could it be any person within the referendum area, or beyond it?

John Turner,  
Chief Executive

Karen Quaintmere,  
Assistant Chief Executive

March 2012
Appendix

Formal response to the Electoral Commission invitation to interested organisations to submit views on the proposed questions to be used at neighbourhood planning referendums

1. Introduction

1.1. This is the formal response from the Association of Electoral Administrators (AEA) to the Electoral Commission invitation to interested organisations to submit views in relation to the assessment of the proposed questions and explanatory material to be used at neighbourhood planning referendums.

1.2. The Association of Electoral Administrators (AEA) was founded in 1987 and has since established itself as a professional body to represent the interests of electoral administrators in the United Kingdom. It is a non-governmental and non-partisan body and has 1674 members, the majority of whom are employed by local authorities to provide electoral registration and election services.

1.3. The AEA encourages and provides training and education in electoral administration, in addition to a range of commercial and professional services.

1.4. The key aims of the AEA are to:

- contribute positively to electoral reform within the UK;
- foster the advancement of consistent and efficient administration of electoral registration and the conduct of elections in the UK;
- raise the profile of electoral administration both within the UK and internationally;
- enhance and maintain the AEA’s reputation as the leading professional body for electoral administrators within the UK.

1.5. The AEA supports and advocates the principle that all those with a role in organising elections should consider the voters’ interests above all other considerations.

1.6. In responding to this invitation to submit views, and in accordance with the AEA’s non-partisan and neutral position, this response does not offer any views on neighbourhood planning referendums or the planning arrangements that are the subject of the proposed questions. Our focus is the impact on the administration of the poll of the proposed wording of the referendum questions and associated explanatory material for voters.
2. The impact of the proposed wording of the referendum question on the administration of the poll

2.1. The AEA is pleased to see that the ‘preamble’ or explanatory material for voters has been included with the assessment of the questions. We would expect the preamble to be part of the usability testing of the referendum questions.

2.2. It is vital to consider how the question and preamble will be presented to voters within the context of the ballot paper design, and any additional material that will be available in advance of the poll to assist voters in understanding what it is they are being asked to decide.

2.3. The Electoral Commission question assessment guidelines contain a checklist which includes consideration of whether the question is written in plain language and describes the characteristics of plain language as using short sentences; being simple, direct and concise; and using familiar words, and avoiding jargon or technical terms that would not be easily understood by most people [our emphasis].

2.4. The AEA is concerned that a number of the terms used in both the questions and the explanatory material or preamble are likely to require further explanation or information to be provided. We are unclear as to where or how this additional information is to be provided. For example, voters may not be aware of the contents of the ‘neighbourhood plan’ or the ‘local plan’. Similarly, references to orders containing development proposals presume that voters have had access to and looked at this information prior to voting.

2.5. The need for further explanation, including some form of glossary of terms, is highlighted by the fact that the proposed referendum questions and explanatory material contain footnotes which we assume are for the purposes of this question assessment consultation.

2.6. The language in the explanatory material is technical in nature, including references to planning policies, compliance or compatibility with orders, development proposals and schemes, and orders ‘coming into force’ etc.

2.7. It should be recognised also that the preamble for each type of referendum is longer than the text for ballot papers generally and so voters may take longer to read and then mark their ballot paper. They are likely to ask the polling staff for information if they do not understand the purpose of the referendum or the language used on the ballot paper. Both scenarios would have an impact on the management of polling stations, particularly if the poll at a neighbourhood planning referendum is combined with the poll at another referendum or election.
2.8. Counting Officers, electoral services staff and polling station staff will be approached by voters seeking further information about the referendum and the question on which they are being asked to vote. In order to preserve the neutrality of election staff and the consistency of information to voters, it is vital that clear and neutral explanations are available in relation to the key concepts, ‘planning tools’ and documents that are referred to in the questions and the explanatory material. There must also be clear guidance for Counting Officers and their staff on handling such enquiries.

Karen Quaintmere,
Assistant Chief Executive
15 February 2012