

Dilwyn Neighbourhood Development Plan

Dilwyn Parish Council response to representations made at the Regulation 16 Stage, April 2019

(NB The representations listed are only those to which a response is considered necessary)

Dilwyn NPD

Representations

A number of representations provided support, no further or neutral comment in response to consultation. The Parish Council is, however, grateful for the organisations concerned in providing a response. They include:

- Herefordshire Council Strategic Planning Team
- The Coal Authority
- National Grid
- Natural England
- Highways England
- J Verdin, Garnstone farms

Ref	Representation By	Summary of Representation	Response
1	A Turner, Herefordshire Council Environmental Health (Air, Land and Water Protection)	<p>1. Ordnance survey historical plans indicate the two proposed housing sites (Policies DW3 & DW4) indicated in light brown on the 'Dilwyn Policies Map', appear to have had no previous historic potentially contaminative uses.</p> <p>2. It would make it easier to reference and identify sites in the next Dilwyn NDP if the proposed housing sites are given IDs on future plans.</p> <p>3. General comments: Developments such as hospitals, homes and schools may be considered 'sensitive' and as such consideration should be given to risk from contamination notwithstanding any comments. Please note that the above does not constitute a detailed investigation or desk study to consider risk from contamination. Should any information about the former uses of the proposed development areas be available I would recommend they be submitted for consideration as they may change the comments provided.</p> <p>It should be recognised that contamination is a material planning consideration and is referred to within the NPPF. I would recommend applicants and those involved in the parish plan refer to the pertinent parts of the NPPF and be familiar with the requirements and meanings given when considering risk from contamination during development.</p> <p>Finally, it is also worth bearing in mind that the NPPF makes clear that the developer and/or landowner is</p>	<p>1. Noted.</p> <p>2. HC has produced the policies maps as per its 'house style' in order to be consistent with its County Policies Map. It has determined that individual sites should not be labelled.</p> <p>3. Noted – Policy DW11 g) covers the issue of contaminated land and would be relevant to applications where this may be an issue.</p>

		<p>responsible for securing safe development where a site is affected by contamination.</p> <p>These comments are provided on the basis that any other developments would be subject to application through the normal planning process.</p>	
2	N Ryan, Dwr/Cymru – Welsh Water	<p>We wish to clarify one point from within the Schedule of Representations which the Parish Council may have misunderstood. We advised in the Regulation 14 representation that if the proposed allocation ‘Land south west of Orchard Close and Castle Mound’ was to come forward, it would likely result in hydraulic overload of the Dilwyn WwTW.</p> <p>The Parish Council’s response comment on this within the Schedule of Representations appears to imply that Welsh Water has committed to accommodating the growth set out. This is not the case and I can confirm there is no reinforcement scheme programmed at Dilwyn WwTW within our current Capital Investment Programme (AMP6 – 2015-2020), whilst at the current time we do not know what schemes will be within AMP7 (2020 – 2025). That being said, the wording of Policy DW9 is acceptable.</p>	<p>Apologies for the inaccuracy which should have referred to the PC’S understanding that Dwr Cymru has agreed with HC that its Core Strategy proportional housing growth requirements will be accommodated within the plan-period although there is currently no committed scheme. The PC is grateful for Dwr Cymru clarifying this point which is understood to mean that compliance with Policy DW9 would enable any developer to work with Dwr Cymru to bring forward a scheme earlier, or that it could be phased to allow development within the plan-period whenever the works are programmed, or a suitable alternative arrangement might be made. This would be in accordance with advice issued by Herefordshire Council in its Guidance Note 19¹ and Dwr Cymru’s advice issued at the Regulation 14 consultation stage (see Appendix 3).</p> <p>It is assumed that any such restriction would apply to sites anywhere within the village required to meet the proportional growth requirements.</p>
3	G Irwin Environment Agency	<p>As part of the adopted Herefordshire Council Core Strategy updates were made to both the Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS). This evidence base ensured that the proposed development in Hereford City, and other strategic sites (Market Towns), was viable and achievable. The updated evidence base did not extend to Rural Parishes at</p>	<p>Dilwyn NDP is not a strategic planning document. The proportional housing growth requirements for Dilwyn were agreed with the EA within the Core Strategy. The site is not within the flood plain of any river. It is however recognised that there are some storm water/land drainage issues that need to be addressed. Policy DW9 will require any</p>

¹ https://www.herefordshire.gov.uk/download/downloads/id/3710/guidance_note_19_sustainable_water_management.pdf

		<p>the NP level so it is important that these subsequent plans offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period.</p> <p>We would not, in the absence of specific sites allocated within areas of fluvial flooding, offer a bespoke comment at this time. You are advised to utilise the Environment Agency guidance and pro-forma which should assist you moving forward with your Plan.</p> <p>However, it should be noted that the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with your drainage team as the Lead Local Flood Authority (LLFA).</p>	<p>developer of the site to undertake a detailed site-specific flood-risk assessment as required by NPPF para 162. The amount of development proposed for the site allows significant scope for drainage matters to be addressed satisfactorily. The landowner also owns adjacent land that could be utilised if necessary. Herefordshire Council is the LLFA and was consulted at both formal stages in the plan making process.</p>
4	P Boland Historic England	<p>Additional comments to those submitted in response to the Regulation 14 Consultation: (Summary)</p> <p>The Heritage Impact Assessment and a site visit to more fully assess the implications of the proposal for housing development on this site and the impact that could have on the significance of the Scheduled Ancient Monument, Castle Mound and its environs was undertaken.</p> <p>Remain concerned that the proposal to include the land south of the motte castle for housing is not sufficiently supported. The Lidar data appears to show earthworks in the area to the south of the motte, and although the land drainage pattern indicates modern improvements within the land parcel the archaeological potential is unknown. This is both in terms of buried archaeology and in terms of landscape understanding.</p>	<p>1. The first objection to the site allocation is that it should not have been allocated before detailed archaeological work, including physical archaeological evaluation of an appropriate sample of deposits had been undertaken. However, such assessment work would normally be undertaken as part of a planning application, as part of the process of preparing details of the development. This would not normally be undertaken at the stage of preparing a Local or Neighbourhood Plan.</p> <p>Nevertheless, as Historic England advised, a Heritage Impact Assessment has been undertaken at a level considered proportionate to that of plan making. This (Lidar) identified that there may be notable archaeological remains in the north-east corner of the site (south of the Scheduled Monument) that ought to be investigated further in a more detailed assessment. The Lidar suggests this is not an</p>

	<p>Was this site actually an outer bailey of the castle? There are traces of platforms and earthworks to the north-east, confirming that archaeological remains are not just confined to the motte itself. The archaeological potential of the proposed land parcel, however, is confirmed as unknown in the HIA (para 4.2).</p> <p>In terms of setting (i.e. The area in which the motte is experienced) the potential impact seems to me to be potentially significant. Due to the recent development to the west and north of the motte the land to the south offers views of the motte in the context of the village. This is also a principal approach route into the village. This setting could be much altered and the view of the motte largely obscured. The overall impact may be to detach the motte from the village, with which it is strongly associated historically. In particular I do not agree that only ‘a small part of the monument’s agricultural setting would be affected’ (para 4.3), or that the HIA currently can rightly conclude that the ‘development should be capable of mitigation’ (para 7.4.1). In overall terms I think we should be asking for a more detailed justification/ evidence base, that includes the factors mentioned in the HIA section 6 before we would be able to assess the appropriateness of this proposed allocation”.</p> <p>Our analysis, therefore, leads to the conclusion that Historic England cannot support the allocation of this site for housing development in the Neighbourhood Plan. This would be to accept the principle of development before it has been made clear what the actual impact of development would be on the Scheduled Ancient Monument, Castle Mound and its environs. This can only be demonstrated by further archaeological work in advance of any allocation undertaken by suitably qualified</p>	<p>extensive part of the site but it will reduce the area available for development, and this has been taken into account in terms of the numbers of dwellings and the policy requirements. The other evidence relating to field name, historical pattern of drainage (historically marshy ground), short life-span of the castle and probable relocation further up the slope, and the fact that it was based upon an agricultural community and did not develop as a historic town adds to the probability that there would be limited further archaeological remains, if any, across much of the proposed site. Nevertheless, a detailed archaeological evaluation would confirm whether this is the case and is required through both general and site-specific policy provisions. It should, however, be noted that even should some unidentified finds be made that require preservation in situ, such measures are not uncommon and there are many sites where this has been possible. Again the limited scale of development will assist with this.</p> <p>More specifically Policy DW3 accepts that not all of the site can be developed and the level of development indicated for the site in terms of the contribution expected towards proportional housing growth (30 dwellings) is far less than would be accommodated for the whole of the site area. The site at 3.7 hectares would, if all was available, be capable of accommodating over 90 dwellings at the low end of medium density (25 dwellings per hectare; 10 dwellings per acre - NB Herefordshire Council is seeking an overall density of 30 to 50 dwellings per hectare – HCS policy SS2). The landowner has accepted this level of development (see Annex 1 to the Basic Condition Statement). Although higher than the SHLAA indication, the lower amount would result in the type of low density housing that would not benefit local needs, as</p>
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		<p>professionals and potentially including physical archaeological evaluation of an appropriate sample of the site deposits. This work could in itself require Scheduled Monument Consent and any strategy arrived at should be discussed in advance with Bill Klemperer.</p>	<p>identified in the NDP, and smaller family housing in the form indicated within policy DW3 would potentially cover a similar area and better reflect the character of the adjacent dwellings which form part of its Conservation Area character in this location. The Heritage Impact Assessment now required through policy provisions will inform whether any greater number of dwellings might be accommodated. The estimated surplus would also take into account some reduction in provision should the suggested figure need to be reduced.</p> <p>When seeking informal advice from the Planning Office upon a smaller development of the site in line with the SHLAA level, it was suggested by the Planning Officer that a higher level of development be considered.</p> <p>2. The second area of concern is the effect on the setting of the Scheduled Ancient Monument. Historic England advice acknowledges that the extent of a heritage asset's setting is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of the asset, may affect the ability to appreciate that significance or may be neutral². It combines setting with views.</p> <p>In terms of visibility, the monument is not visible from the south direction but its location, to those aware of its presence, is represented in the form of an unmanaged coppice. In terms of the way in which the motte is experienced, the development of this site will not sever the last link between the monument and its original setting as</p>
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² <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/> (Part 1, 1st paragraph)

			<p>not all of the site needs be developed and there are substantial areas to its east that will remain. Similarly views which contribute more to understanding the significance of a heritage asset (page 6 of the settings document) are better from the easterly direction along Venmore Lane where they also encompass platforms where it is thought a manorial building replacing the castle would have stood away from then wetter areas. The eastern views, therefore, offer a greater composition of the history relating to what was a relatively short-lived castle, within a rural community and replaced by a manorial building. This view is far more important than that to the south in that regard and given greater regard in the assessment of site options. Nevertheless, it should still be possible to retain some of the southern setting, especially in the north-east corner of the proposed housing site while accommodating the suggested amount of housing. It should also be possible to provide public access to better appreciate the monument through the roads, paths and open space that will be needed within the development whereas at present there is no public access to its edges.</p> <p>No adverse comments were received in relation to the approach put forward at either Regulation 14 or Regulation 16 by either the Council's Historic Building Officer or its Archaeological Adviser despite the latter being copied into correspondence with Historic England.</p> <p>The NDP Heritage Impact Assessment did consider other options that were available. Any choice of sites results from balancing differing factors and the site assessments considered a range of key factors affecting choice of site.</p>
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5	M Tansley Herefordshire Council, Development Management	The housing allocation on the west edge of the village will affect the setting of the sched mon from the main public vantage point. Historic Buildings Officer is better qualified than I to assess the extent of that impact.	No comments were received from Herefordshire Council's Historic Buildings Officer at either the Regulation 14 or Regulation 16 consultation stages. It is recognised that there will be some effect on the SAM's setting but it is considered this can be satisfactorily mitigated. It is also noted that no adverse comments were made in relation to some element of development upon this site within Herefordshire Council's SHLAA. In addition, it is also noted that Development Management Officers recommended a larger part of the site be proposed for development when advising the landowner's agent culminating in the outline approach presented in Annex 1 to the Basic Condition Statement.

6	Tomkins Thomas planning on behalf of I Hudson	<p>(Summary of detailed response)</p> <ol style="list-style-type: none"> 1. Land adjacent to Wood Stock Cottage, despite having been refused planning permission is available for development and should be included within the settlement boundary. 2. Development of 4 cottages has been permitted opposite; it is commercial orchard where the contract has not been renewed. 3. The County ecologist considered a modern orchard is not a constraint to development, contrary to the NDP site assessment. 4. The 10 dwelling scheme could offer some dwellings as low-cost market properties. 5. The development could comply with design requirements in terms of scale and phasing. 6. Disagrees with the analysis that development of the site fills a gap that is important to the character and appearance of the Conservation Area siting that which has been permitted opposite and conflicting with that approach to the gap and the argument is largely academic. 7. The site adjacent to Orchard Close and Castle Mount is very sensitive in relation to the Scheduled Ancient Monument. 8. The significance of the effect on the landscape of development at site at Wood Stock Cottage is incorrectly attributed to the modern commercial orchard. 9. A sensitively designed scheme would overcome the reason for refusal in relation to the character and appearance of the Conservation Area. 10. Policy DW17 needs to be refined to refer to a certain scale of development. 	<ol style="list-style-type: none"> 1. When preparing the Plan, the NDP Steering Group noted that this site was not only refused planning permission, but it was also ruled out by Herefordshire Council within its Strategic Housing Land Availability Assessment (see Appendix 1). 2. The development opposite was granted planning permission by Herefordshire Council before work commenced in earnest upon the NDP and the NDP was not a material consideration. It is assumed that its adverse effects were sufficiently mitigated and outweighed by the design approach and other material considerations. 3. The assessment took into account both the loss of orchard and the loss of hedgerow, both of which were referred to in the Planning Officer's report (see Extract – Appendix 2³). The County's Ecologist points to the fact that even though a commercial orchard, it is still a 'Habitat of Principle Importance'. The loss of the hedgerow was rated even more importance leading to his objection to the proposal. The combination led to the rating indicated in the site assessment. The representation mis-understands the purpose of the assessment which is not to decide whether planning permission should be granted but to identify which are the best sites and which the least-best. 4. It is possible for a landowner to offer such benefits, but it cannot be required to provide them for developments of 10 dwellings and below.
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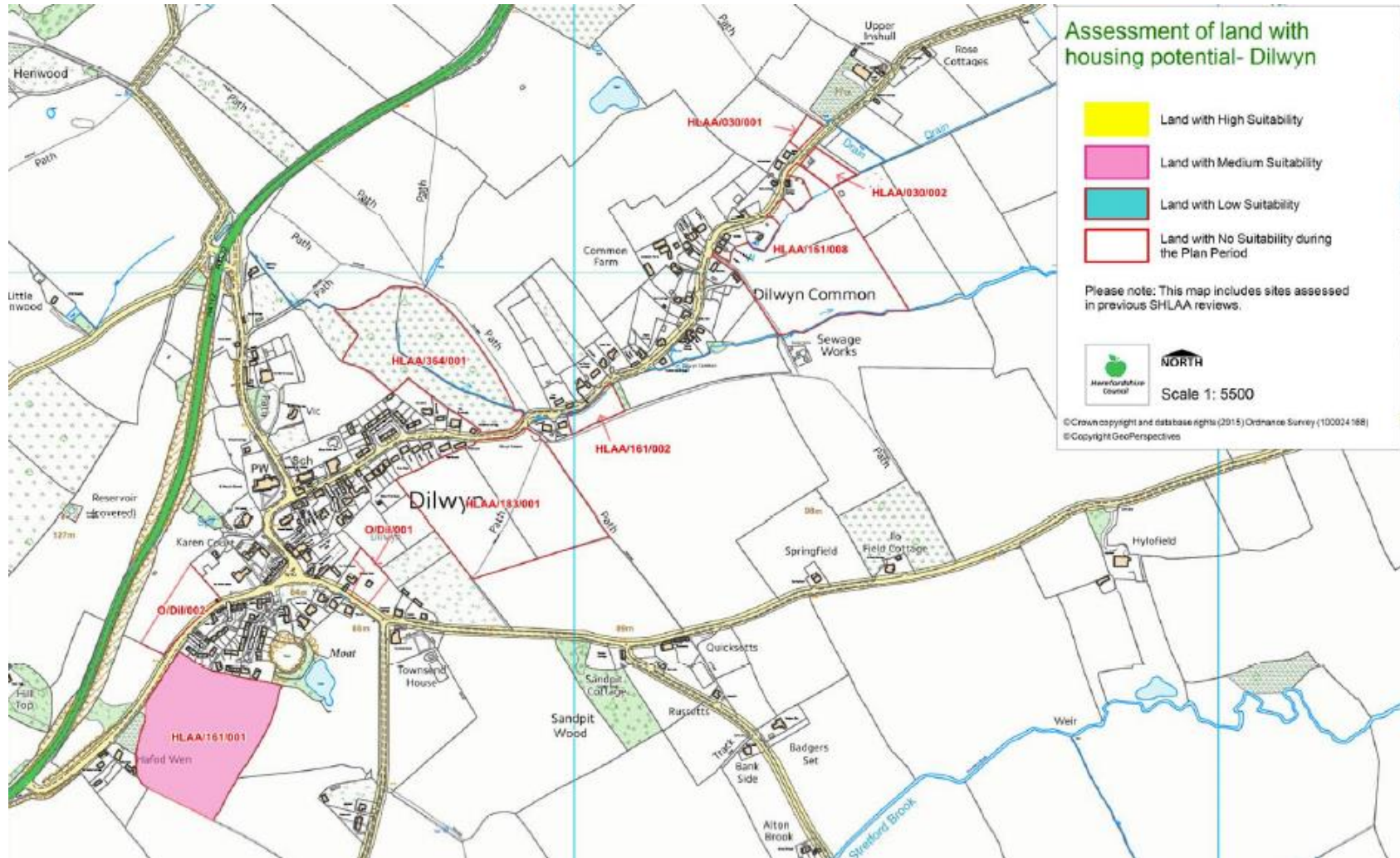
³ For the full Officer's report and other related document on the planning application go to the link and use the links on the right hand side
https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=152567&search=Wood%20Stock%20Cottage

		<p>11. The housing site assessment is perfunctory and have reservations about certain of its outputs in particular effect upon the built and historic environment.</p> <p>12. Development adjacent to Wood Stock Cottage complies with or does not conflict with many of the policies (referred to in the submission) within the NDP.</p> <p>13. Should Historic England maintain its objection then the plan will not deliver the housing required and Wood Stock Cottage site will deliver a sensitive and high-quality scheme of 11 dwellings or smaller development if required.</p>	<p>5. Most sites can achieve a high standard of design and consequently is not a useful indicator in terms of differentiating between sites.</p> <p>6. The view and scoring indicated in the site assessment is consistent with advice offered to the Planning Officer by the Council’s Historic Building (Conservation) Officer – see Appendix 2.</p> <p>7. The assessment of the site adjacent to Orchard Close and Castle Mount and its relationship with the Scheduled Ancient Monument take into account the advice within Herefordshire SHLAA in that it acknowledges that not all of the site should be developed. It is a very substantial area considered capable of some level of development to be informed by a Heritage Impact Assessment. The Scheduled Ancient Monument criterion (Criterion 1.1) took into account the setting of the monument and it was considered this could be satisfactorily mitigated. The site falls outside of Dilwyn Conservation Area (Criterion 1.4).</p> <p>8. The criterion relates both the landscape and the setting of the settlement. Its sensitivity is not attributed to the commercial orchard but to the green gap as indicated under criterion 1.2.</p> <p>9. The contribution that the site makes to the character and appearance is not down to design but the maintenance of the gap marking the point of difference between two settlement forms.</p> <p>10. This policy has been included and accepted in many other NDPs within the County. It does not define scale because provisions may change, especially should Herefordshire Council adopt a CIL scheme.</p> <p>11. The assessment follows an approach used and found to be appropriate for many other NDPs within the County. The process is not one of determining whether planning</p>
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			<p>permission should be granted but of a preference ranking of sites in accordance with a range of criteria agreed by the NDP Steering Group (and supported by the Parish Council) following consultation with the community. The assessment utilises information available within Herefordshire SHLAA together with locally determined criteria in a proportionate approach as in accordance with NPPG paragraph 004 Reference ID: 3-004-20140306. In the light of this, the site assessment and options exercise has been undertaken that complies with the requirements of the NPPG, and is allocating housing that is certainly no less than that required by the Development Plan – a requirement of the NPPF, but in fact provides for a higher amount in a way that the community feels meets the particular needs as evidenced in the AECOM report included in the NDP evidence base.</p> <p>12. The process of site assessment and choice of sites is not one of determining a planning application. It is to identify sufficient sites to meet strategic and community requirements utilising what the community considers to be the most appropriate sites.</p> <p>13. The views of Historic England have been given significant weight and the NDP Steering Group has undertaken a Heritage Impact Assessment that has led to a change that it believes should address that organisation’s concerns. Those concerns appear not to have been supported by Herefordshire Council during the two statutory stages of consultation. There are other sites and approaches that might be considered should an alternative be required.</p> <p>It is understood the task of the Examiner is not to consider the soundness of the Plan and its allocations and choice but to consider whether the Plan has complied with the Basic Conditions. In this regard the NDP Steering Group has</p>
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			<p>sought to balance needs with potential constraints. Herefordshire Council has indicated that it considers all the NDP policies comply with Herefordshire Local plan Core Strategy.</p>
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Appendix 1: Extract from Herefordshire Council's Strategic Housing Land Availability Assessment for Dilwyn.



Appendix 2 – Extracts from Planning Officer’s Report in relation to the site adjacent to Wood Stock Cottage relating to advice from the Council’s Ecologist and Historic Building’s (Conservation) Officer

The Council’s Ecologist second submission of 29 October 2015 objected to the application:

I have read the response from Transport and note that there is a necessity to remove the largest portion of the southern hedgerow. The ecological report also notes that loss of a portion of the hedgerow would have a negative impact. Whilst I accept the findings of the ecological report and recommend the two conditions should approval be given, this requirement to lose the site’s most significant natural asset is unacceptable. I have viewed the hedge this week; there are some seven woody species along its whole length and would concur that this it is species rich. As such it is a good example of hedgerow habitat listed under the NERC Act 2006 as UK Biodiversity Action Plan Habitat (now Habitat of Principal importance). As removal of this hedgerow appears to be central to the development I am afraid I now have to object on this basis. Also I believe that you have discerned this site to be flagged as a traditional orchard. Indeed this is the case and I have checked the mapping system which shows this to be so although not on the ecology workspace. It is on the landscape and biodiversity workspace and is registered as a Traditional Orchard within the Natural England database used.

I believe the evidence for it being a commercial orchard and declared with Defra as such ought to be sought. This is not my area of expertise and not-with-standing my comments regarding its commercial status, it would still rate as a Habitat of Principle Importance and therefore have presumption against development in policy. My objection would therefore be sustained on this basis as well.

The Council’s Conservation Officer objected to the application:

The proposed development site forms part of the Dilwyn Conservation Area. No mention of this is made in the application material and there is therefore no resulting assessment of the impact of the proposed development on the character and appearance of the conservation area. I find the lack of information provided in this regard unacceptable and indeed, I would consider it inappropriate to consider a scheme of this size within the conservation area when it has only been presented in outline form.

Notwithstanding the nature and form of the application, I have an in principle objection to development in this location. The proposal would the development of a site that is currently planted as an orchard and that has always historically formed an area of open or planted land between the two settled parts of the conservation area. The development in its current form this valuable open space entirely and, as I understand it, involve the removal of a large part of a traditional orchard which undoubtedly makes a positive contribution to the character and appearance of the conservation area. The proposed development layout would be largely counter to the pattern of development in the local area and the conservation area as a whole. For reasons set out above, I object to the proposed application.

Appendix 3 – Regulation 14 stage response from Dwr Cymru, Welsh Water



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Dilwyn Parish Council Neighbourhood Plan
FAO Peter Kyles

Enquiries: Rhys Evans/Ryan Norman
0800 917 2652

19th October 2018
Sent via email

Dear Sir/Madam,

REGULATION 14 CONSULTATION ON DILWYN NEIGHBOURHOOD DEVELOPMENT PLAN – OCTOBER 2018

I refer to the above consultation. Welsh Water appreciates the opportunity to respond and offers the following representation:

Given that the Neighbourhood Development Plan has been prepared in accordance with the Core Strategy, we are supportive of the aims, objectives and policies set out.

Policy DW3: Housing sites in Dilwyn village

We understand through Policy DW2 that as the main settlement in the Parish Council area, Dilwyn is the focus of development growth and provision is made for a minimum of 46 dwellings, with two specific allocations set out under Policy DW3:

Land south west of Orchard Close and Castle Mound – minimum of 30 dwellings

Water supply

There are no problems envisaged in providing this site with a water supply. The site is traversed by a 4" distribution water main for which protection measures will be required in the form of a diversion or easement width.

Sewerage

There are no problems envisaged with the public sewerage network accommodating the foul flows from this site. However, offsite sewers will be required to be laid to the curtilage of the site.

Wastewater treatment

A development of 30 dwellings (minimum) would represent a 19% increase in loadings at our Dilwyn Wastewater Treatment Works (WwTW) and this would likely result in hydraulic overload, and as such would not meet the requirements of Policy DW9 of the Neighbourhood Plan and Policy SD4 of the Core Strategy.

There is no reinforcement scheme proposed in our current Capital Investment Programme (AMP6 – 2015-2020) therefore should potential developers wish to deliver the site prior to any future regulatory investment on our part, they will need to fund a feasibility study which would identify the reinforcement works required to accommodate the foul flows from their site, before entering into a section 106 (of the Town and Country Planning Act 1990) agreement to fund the scheme.

Land east of Brookside Bungalow, Dilwyn Common Lane – minimum of 3 dwellings

Water supply

There are no problems envisaged in providing this site with a water supply.

Sewerage

There are no problems envisaged with the public sewerage network accommodating the foul flows from this site.

Wastewater treatment

There are no issues in Dilwyn WwTW accommodating the foul flows from this site.

Policy DW9: Foul and storm water drainage and flooding

We applaud the provisions of this policy which will ensure that development will only be allowed where there is sufficient capacity in the public sewerage system, and that if a development would hydraulically overload the public sewerage system then developers will need to work with Welsh Water to fund the required reinforcement works.

We also welcome the requirement for developers to utilise sustainable drainage systems (SUDs) in new development as this will ensure that the public sewerage system only accommodates foul-only flows, thereby capacity is not taken up by surface water.

We hope that the above information will assist you as you continue to progress the Neighbourhood Plan. In the meantime, should you require any further information please do not hesitate to contact us at Forward.Plans@dwrcymru.com or via telephone on 0800 917 2652.

Yours faithfully,

Ryan Norman
Forward Plans Officer
Developer Services