

MODBURY NEIGHBOURHOOD PLAN 2015-2034

Submission Version, March 2020

1. INTRODUCTION

- 1.1 The submission version of the draft Modbury Neighbourhood Plan 2015-2034 (NP) dated March 2020 was subject to “Regulation 16 consultation” between 3 August and 14 September 2020. The consultation was reopened for a further six-week period between 5 October 2020 and 16 November 2020 when other representations were received, including an additional document, “Modbury ‘East of Ayleston Park’ Feasibility” produced by Modbury Parish Council/Modbury Neighbourhood Plan Group. In light of these, SHDC decided to extend the consultation until 21 December 2020.
- 1.2 This further submission is supplementary to my earlier submission dated 12 September 2020 made as part of the “Regulation 16 consultation”.

2. MODBURY ‘EAST OF AYLESTON PARK’ FEASIBILITY

- 2.1 It is unclear who commissioned or prepared this document, or why it was considered necessary to produce an addendum to the Evidence Base supporting the plan proposal submitted under Regulation 15 in March 2020.
- 2.2 This document provides no evidence for any of the changes outlined.
- 2.3 The inclusion of two adjacent fields, with the proposal for Site C, land east of Ayleston Park, at this late stage is a substantive change to the Neighbourhood Plan that will also require a further redrawing of the settlement boundary.
- 2.4 The development site proposals are set out in Policy MNP3:

Development of 40 homes is proposed on a site east of Ayleston Park, including:

- a. 50% affordable housing to rent or buy and which should remain affordable in perpetuity,*
- b. high quality design in appearance, sustainable construction and energy efficiency,*
- c. safe and convenient access for all, including good pedestrian access to the town centre, and*
- d. landscaping and public space, particularly to the south and west of the site.*

This site shall take the place of that proposed for 40 homes at Pennpark, which shall be deleted from the development plan. **POLICY MNP3: DEVELOPMENT SITE PROPOSALS**

- 2.5 The supplementary proposals introduce further key points for consideration in the design of the housing development and incorporate two adjacent fields for community use in order to complement the proposed housing development.
- 2.6 The value of residential building land will be less if a developer is to deliver a higher percentage of affordable housing and/or fulfil other requirements that will incur additional expenditure. Consequently, unless such requirements are enforceable, these are unlikely to be achievable.

- 2.7 At the present time there is no guarantee that the trustees who own the freehold of these three fields will sell at below open market value to SHDC for the proposals being worked upon by the Community Housing Team. In response to a Freedom of Information request (Ref: 1497256) SHDC advised on 18 November 2020:

“an Option Agreement has not been entered into by the Council” and “there are no legally binding agreements between the Council and another party in relation to the land at the current time. If a project for community housing was to proceed then it is expected that it would be necessary for a land transfer to take place and a building licensing agreement in order to develop the land.”

- 2.8 Since the beneficiaries of a trust are entitled to expect that the trustees will manage the trust property for their benefit it is also questionable whether the trustees are empowered to sell land at below open market value.
- 2.9 The proposals as set out should be treated with caution since these amount to no more than worthy generalised aspirations that can readily evaporate when the viability of the site is subject to a comprehensive appraisal, reflecting the abnormal development costs, and during the detailed planning process.

3. REVISED INDICATIVE PLAN / CONCEPT SKETCH – HOUSING

- 3.1 The revised “indicative plan” is unattributable.
- 3.2 Although the drawing is endorsed “not to scale”, the size of buildings shown are smaller in relation to the site compared with those illustrated in “Figure 1 – Proposed Site Layout and Housing Mix by Studio Agora” in the report prepared by Arcadis [Copyright © 2018 Arcadis]. <https://www.modburynpg.co.uk/wp-content/uploads/2020/05/Modbury-Housing-Development-Letter-to-NPG-200203-Highways-Engineering.pdf>
- 3.3 Consequently, comparisons between the two are unreliable and the latest plan is open to misinterpretation.
- 3.4 The proposed access road at the site entrance has been moved northward closer to the boundary with 9 Ayleston Park. Without the consent and co-operation of the owner, the construction of a retaining wall without incursion or causing damage to this property will be nigh on impossible unless totally disproportionate costs are incurred to engineer a solution, further escalating the already abnormal infrastructure costs for the site, or compulsory purchase powers are used.
- 3.5 Likewise, since the land at site entrance must be lowered to provide an acceptable gradient for the roadway access, construction of a retaining wall on the south side along the boundary with 11 Ayleston Park will also require the consent and co-operation of the owner.
- 3.6 The realignment of the road is likely to involve destroying a section of the ancient hedgebank and felling of a tree to the north side of the entrance to the site. This Devon bank formed the eastern development town boundary in the 1996 South Hams Local Plan.

- 3.7** The proposed access to a development of 40 housing units is a single carriageway, with shared space for vehicles, pedestrians and cyclists. This unusual design, between a road junction and sharp bend upon entry to the site, has been necessitated due to the restricted width at the site entrance and the physical restraints imposed by steep topography. This access is through a gap in the Devon bank along the route of the medieval footpath historically linking Old Traine to the south and east, as shown on the First Edition of the six-inch Ordnance Survey map 1886. The field gate at this point was incorporated into the design of the turning head of Ayleston Park when the 18 houses were built at the turn of the century.
- 3.8** In an attempt to mitigate the lack of visibility at the entrance to the site, the latest proposal extends the length of roadway into the site before turning eastwards. This in turn pushes the 20 houses and 20 flats northwards further reducing the net site area available for development.
- 3.9** Even with this alteration the access roadway to the site remains unsatisfactory and of poor design. Signage to guide drivers for traffic flow and priority on a single-lane working chicane would still be needed; a cycle bypass would be required and potentially there will be a need for a pedestrian crossing to direct pedestrians through the narrowing from the existing and the proposed estate road.
- 3.10** The houses at the northern end of the site have been moved closer to the farmyard and slurry pit including the three at the top of the hammer head along the boundary with the farm. This is in total disregard of the caution in the Arcadis Initial Site Assessment of September 2019 (“Proposed Housing Development Modbury”) at para 3.1:
“Consideration will need to be given to the proximity of proposed dwellings to the farm situated to the north of the site in relation to odour, noise and dust.”
- 3.11** No such consideration has been given in the proposed layout of houses adjacent to the farmyard and slurry pit in either the initial concept plan or the revised indicative plan.
- 3.12** The setting of the Grade II*/II listed 15th century complex of historic buildings at Old Traine will be further compromised as the houses have been moved closer. *“Old Traine is of very high local significance, and of high national significance”* - Land & Heritage Report November 2020.
- 3.13** Two houses and one side of the hammerhead cul-de-sac adjoin the boundary with the non-designated 15th century converted tithe barn known as Old Traine Barn and Old Traine Cottage, only 15m from the site boundary. This 15th Century tithe barn warrants being locally listed due to its historic use and is of similar age to the adjoining Grade II listed buildings. It retains much of the original external characteristics of the tithe barn even though it has been given a new lease of life having been tastefully converted to residential use in recent years.
- 3.14** It should be noted there are no locally listed heritage assets within the parish, an omission that Historic Environment Officers at Devon County Council have advised should be addressed.
- 3.15** The comments of Graham Lawrence IHBC Specialist (heritage) Development Management SHDC/WDBC as to the adverse effect on the historic environment are pertinent:
“The most apparent issue from a heritage perspective is the likely effect on the setting of the Old Traine group which consists of a collection of grade II heritage assets and the main II house. Whilst the rural setting has been lost on the western side it remains effectively intact to*

the south and east. This is appreciated mostly as Old Traine is approached from the south along the footpath. As the viewer passes the crest of the hill the historic group is revealed in a sequence of views. The positive experience of approaching Old Traine from the south on foot would need to be a conscious design feature in any proposal coming forward.

Development of the proposed allocation site would change the setting to the south of Old Traine quite fundamentally. That change of character can only constitute some degree of harm. This would certainly be 'less than substantial' in NPPF terms, but it will still 'require clear and convincing justification' (NPPF194). The actual level of harm can only be properly assessed if there were a Development Brief or Masterplan available. How any proposed development is laid out in terms of orientation, variation of density, massing, scale and use of green infrastructure across the site will add to or lessen impact. There is the possibility of mitigation but that should be considered now to demonstrate that harm can be minimised through design.

It may be argued that there are 'public benefits' to development of this site that outweigh the harm as per NPPF196. The fact that the JLP has already identified sites for further development which were assessed for heritage impact cannot be avoided in considering the planning balance.

A simple summary from a heritage perspective is that harm to the setting of the heritage assets I have identified could be avoided by not allocating this site for development. I suggest that the proposers of the site seek to identify how the harms may be mitigated through good design and balanced by evident public benefit."

3.16 This site has also been assessed by Land & Heritage in the report of November 2020:

"The site is overlooked by buildings within the conservation area, and has a footpath directly across the centre, which is frequently used. It is distantly overlooked by the church of St. George, a Grade I listed church of national significance.

Development of this site will have a negative impact upon landscape and heritage in varying degrees, the level of which is dependent upon the layout and landscaping. A scheme which employs sensitive use of the site topography, and the use of planting screens will have a lower impact."

3.17 Both the initial concept plan and the revised indicative plan propose an estate of 20 houses and 20 flats. The initial concept plan has an equal number of detached and semi-detached houses whereas the revised indicative plan shows 14 detached and 6 semi-detached houses. In both cases the houses are on the largest part of the site, occupying some 80% of the developable area. The main roadway serving the houses ascends straight up the hill in the centre of the site with a similar number of houses to each side with the remaining 3 houses situated at the head of the cul-de-sac. This is the worst of design and fails to take account of topographic features other than the initial snaking of the road in order to achieve an acceptable gradient.

3.18 The Land & Heritage report concludes:

"Development of the site will have some form of negative impact upon the landscape and heritage assets, the level of which will vary based upon proposed schemes. If the proposal

were to develop the entire site with a modern housing estate, based upon detached and semi-detached houses, then the negative heritage impact would be high.

It would be possible to design a development that has a lower impact on the surrounding heritage assets, by careful use of planting and screening, and by using the site topography to full advantage. This could be achieved by designing a terraced, linear development, made up of a double row of 'attached' houses of varying sizes and styles, more typical of Modbury.

It is essential that every effort is made to protect the area immediately to the south-east of Old Traine. This could be achieved by creating a small meadow or green space immediately to the south-east of the Old Traine group of buildings. Enclosed by a new native hedgerow, this would act as a significant screen to the new development."

3.19 This site is also clearly visible from the Grade 1 listed St. George's Church, looking north east, and these housing proposals will have an adverse impact.

3.20 When reviewing the visibility of this site from around the town, Marina Neophytou & Susan Watts, Historic Environment Officers, DCC commented:
"particularly noteworthy ones such as the Church of St George 14th century, listed Grade I. A medieval priory is also recorded within the churchyard."

3.21 Graham Lawrence IHBC Specialist (heritage) at SHDC is of opinion:
"There is also a potentially significant view of the site from the Church of St George (grade I) so the setting of the Conservation Area as well as Old Traine needs consideration from there. The view towards the church over the roofscape of the Conservation Area from the PROW is one that must be captured in the layout of any development proposal."

3.22 The Land & Heritage report states:
"The church of St. George has a clear view of the site, and from here the likely impact on the wider setting is potentially high. A development on the site is likely to introduce buildings to the horizon, and the removal of any connection to the wider rural landscape."

3.23 This site also contains features of archaeological interest. Historic Environment Officers at DCC have stated:
"Also, within the Site, the Devon Historic Environment has recorded the remains of an earthwork enclosure of probable medieval to post-medieval date and earthworks pertaining to historic field boundaries. A programme of archaeological works would be recommended for this site and should include liaising with the South Hams Conservation Officer, a heritage and setting assessment in support of the planning application and a programme of archaeological works which may be required either prior to or as a condition of the planning application submission."

3.24 A Public Right of Way, footpath No. 2, crosses the proposed development site, shown as Lower Little Park in the 1841 Parish Tithe Map, from north to south and leads into the two fields to the south. These are proposed as local green spaces and in turn link with the Millennium Meadow.

3.25 Although *"Enhancement of the existing public right of way by planting and visual connection to spaces"* is a key point for consideration in the design of the housing development, neither the

initial concept plan nor the revised indicative plan illustrates or sets out details of the proposed realignment of this historic Public Right of Way, explain how the views over Modbury and of St George's Church are safeguarded or specifies landscaping. Both plans do however show a footpath that crosses the main road into the development at its junction with the service road to the 20 flats.

- 3.26** The development proposal is for 50% affordable housing. To achieve this, having regard to the economic viability of this site, or lack of viability due to the substantial abnormal site costs that will be incurred in any development of this site, it is inconceivable that this allocation will be other than the 16 one bed and 4 two bed flats. These are shown in 4 blocks of 5 units, crammed on to some 20% of the site's developable area.
- 3.27** It is unacceptable to create such a demarcation between 20 houses to be sold at market value and 20 flats to rent or to buy at discounted prices, and remain affordable in perpetuity.
- 3.28** There is a disconnect between the layout design in the revised indicative plan (and initial concept plan) with the generalised aspirations of the key points described and images shown in the Feasibility document.

4. REVISED INDICATIVE PLAN – COMMUNITY USE

- 4.1** A submission made on behalf of the Modbury Neighbourhood Plan Group and Modbury Parish Council during the re-opened Regulation 16 consultation, that ended on 16 November 2020, announced the owners of Site C, the proposed housing site, have offered the two adjacent fields for community use in order to complement the proposed housing development.
- 4.2** The Landscape Assessment describes these three fields as forming *“an important publicly accessible “green lung”, connecting different parts of Modbury for walkers, children’s play and as a wildlife corridor. With few other publicly accessible open spaces this area should be considered as having a high value to the community.”*
- 4.3** The first field, adjacent to Site C/proposed housing development, is an area of meadow. The field is higher at the northern side and slopes significantly to the south down to Tucker's Brook, a stream running from east to west.
- 4.4** The adjoining second field is a grassed pasture field to the south of Tucker's Brook and rises steeply, at a gradient of 1 in 3, to the southern boundary that runs behind the rear gardens of houses in Galpin Street.
- 4.5** To the east side of these fields lies the bund and attenuation basin recently constructed as part of the Modbury Flood Management Scheme.
- 4.6** These fields lie outside the town settlement boundary and form part of the pattern of medieval enclosures with hedge banks in an undulating pastoral valley landscape within the setting of the South Devon Area of Outstanding Natural Beauty (AONB).
- 4.7** Notwithstanding the overwhelming conservation and landscape arguments against future development, the topography of these two fields and lack of access would make any such proposal unfeasible as well as severely restrict any other potential use of this land.

- 4.8 Rather than grazing sheep and cattle, the proposal is to change the existing pastoral use to planted area and community use to provide safe natural play spaces for children and create public open space *“to build on existing community celebrations, gatherings and educational events”*.
- 4.9 However, the sloping nature of these fields makes them inaccessible for some sections of the community and difficult for many so that community uses are impracticable. Furthermore, in winter months these fields become extremely muddy and slippery and can be perilous. The open space also fails to meet the criteria for children's recreation and is in close proximity to the stream, bund and attenuation basin between the two fields that pose a potential hazard. None of which have been addressed in the Feasibility document.
- 4.10 The southernmost field is adjacent to the millennium meadow and the community orchard that is similarly steep. This limits the actual enjoyment of this community asset and it is questionable whether another similarly challenging public open space *“to build on existing community celebrations, gatherings and educational events”* that excludes the disabled, frail and elderly is actually needed or sought by the community, or would be used.
- 4.11 A Public Right of Way, footpath No. 2, crosses these two fields already providing public access to this amenity.

5. COMMUNITY ASSET OR LIABILITY?

- 5.1 For a town of its size, Modbury lacks publicly accessible green spaces within the settlement boundary and the prospect of adding to this will be of significant benefit. Prima facie an offer of land to be used by the community is a welcome and generous gift.
- 5.2 These two fields on the eastern side of town, together with Site C, are however already publicly accessible, regularly used by many residents and this “green lung” highly valued by the community.
- 5.3 The Feasibility document states the *“owners of the land to the east of Ayleston Park [Site C], have offered the two adjacent fields for community use in order to complement the proposed housing development.”* Presumably this largesse is not unconditional but contingent upon planning permission being granted for housing on Site C.
- 5.4 It is not stated whether this gift will come with an endowment, a capital sum so that the proposals can be realised or an undertaking to contribute to ongoing maintenance costs.
- 5.5 One field has a substantial area of Japanese knotweed, adjacent to the rear gardens of properties in Galpin Street. This will be very expensive to manage, destroy and dispose of. Will the landowner bear the cost of eradication of this invasive non-native plant and indemnify the future owner of the field against potential claims from adjoining property owners?
- 5.6 No details are provided as to the future ownership of the two fields, SHDC, MPC or Community Trust, nor what resources the future owner may have access to in order to create the vision outlined as well as properly manage and maintain this land.

- 5.7 No business plan, details of income or any costings have been made available as part of the feasibility. As the pastoral use will be brought to an end, no income will be generated by this land and the maintenance obligation imposed on the farmer under the tenancy will cease.
- 5.8 MPC/MNPG merely state “We will seek support for planting and landscaping from a variety of sources. The Modbury Society has already promised support and we will be applying to other organisations such as the Woodland Trust for help and advice.”
- 5.9 The submission by the Modbury Society state “As we see all of this as of great benefit to the town’s residents of all ages well into the future, the Society has already promised the NPG a grant towards the necessary ‘seed corn’ to help generate the necessary funding to fulfil enhancement of the area to a high standard.” The quantum of this grant is not specified.
- 5.10 Without sheep and cattle to graze the grass it will require volunteers to cut. This is likely to be problematic since the community already struggle to find volunteers to look after existing green spaces.
- 5.11 Besides keeping the grass at a manageable level, paths, gates, bridges, woods, new plantings of trees, shrubs and plants, wild flower meadows, social interaction spaces, play areas, seating etc will require to be maintained together with associated costs.
- 5.12 Without these further details it is impossible to say whether the transfer of these two fields and change of use would be a benefit to the community or if it will result in an onerous burden.

6. SITE DRAINAGE AND FLOOD RISK

- 6.1 Neither the initial concept plan nor the revised indicative plan show the contours of the site for the proposed housing development. If these were shown, it would be seen clearly the natural flow of surface water is to the south-west, towards the drainage system that serves the 18 dwellings in Ayleston Park.
- 6.2 Besides the limited capacity of the existing surface water sewer in Ayleston Park, the discharge is into a watercourse on the town side, to the west and downstream of the recently constructed Modbury Flood Management Scheme.
- 6.3 Unless all surface water from the proposed development is collected and diverted away from Ayleston Park, against the natural flow, and discharged upstream of the bund and attenuation basin or dealt with by other water management practices, development of Site C will increase the flood risk to the town.
- 6.4 To engineer such a solution will be complex and costly.
- 6.5 There have been reports of several incidents recently. MPC minutes of the 6 October 2020 meeting record one of these: “Peter Watts [Chairman] thanked the flood wardens for their recent emergency assistance which prevented the flooding of the Health Centre.” (Minute 20.98 Committees and Working Groups.)
- 6.6 A notice titled “MPC Community Emergency Plan” placed in the Modbury Messenger under MPC Report states “With the onset of winter we will now be in need of Flood and Snow

wardens to assist around the Parish when the need arises. Even with the new flood defences proving to be working, the Health Centre was recently saved from being waterlogged by the quick actions of our team following a heavy downpour.”

- 6.7** The supporting evidence for Site C, east of Ayleston Park, omits to include a flood risk assessment. A fully worked up drainage scheme has not been produced for any development of this site nor have details of sewerage capacity been disclosed.
- 6.8** The NPPF includes advice relating to flood risk. Paragraph 156 states that strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources (including drainage issues).
- 6.9** The submission by Devon County Council states:
“Any new development should produce a surface water management strategy in line with the SuDS for Devon Guidance (2017). This will ensure that the development will not result in an increase in flood risk by mimicking greenfield runoff rates via attenuation techniques. We would be happy to liaise with developers and/or their consultants through our pre application service”
<https://www.devon.gov.uk/floodriskmanagement/planning-and-development/pre-application>
- 6.10** As the draft NP disregards the JLP allocated site at Pennpark and proposes a greenfield development east of Ayleston Park, where no flood risk assessment has been made, it fails to meet the fifth of the Basic Conditions [para 8(2)(b) of Schedule 4B of the Town and Country Planning Act 1990].
(e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority

7. DEVON COUNTY COUNCIL HIGHWAYS SUBMISSION

- 7.1** DCC Highways have responded to Policy MNP3 (Development Site Proposals), 40 homes – site east of Ayleston Park:
“The potential development east of Ayleston Park is likely to have an impact on the junction of A379 and Brownston Street because there is insufficient room to allow two-way traffic to pass. This junction already causes some queuing on the A379. The development would result in some additional queuing and possible congestion.

However, the scale of development needs to be taken into consideration. At 40 dwellings, it is estimated that the Ayleston Park site would add around 15 -20 two-way movements onto the A379-Brownston Street junction in any given peak hour. This is based on the fact that some traffic may choose to use Dark Lane and Barrack Road as an alternative route to/from the A379. There are no records of any accidents reported to the police at this junction in the previous 3 years.

Taking the scale of development into consideration, the potential impact on the highway network in terms of capacity and the accident record at the junction, it is concluded that no objection is raised on highway grounds regarding the proposed Ayleston Park site.”

- 7.2 Yet in the 1996 South Hams Local Plan, setting out the detailed planning policies and proposals for the Modbury area it is stated:

“Planning permission has been granted for residential development on 1.8 hectares (4.4 acres) of land [Ayleston Park] to the east of Brownston Street with vehicular access from Silverwell Park. Many of the town’s streets leading to the site [Ayleston Park] are steep and narrow. The County Engineer and Planning Officer has therefore advised that no more than 50 dwellings should be accessed from Silverwell Park.”

- 7.3 The 1996 South Hams Local Plan (paragraph 1.9) states -

“However, the valley running east from the foot of Brownston Street is an attractive feature of the town. Its floor and steep lower slopes are prominent to view from the church and the Memorial Hall and should remain undeveloped. The extent of growth should therefore be limited for landscape and highway reasons. This Plan accordingly allocates a site of about 0.4 hectare (1.1 acres) [Tuckers Brook] as an extension to the 1.8 hectares (4.4 acres) [Ayleston Park] site with planning permission.

- 7.4 The total number of dwellings accessed from Silverwell Park already exceeds 50 by over one third. (21 in Silverwell Park, 18 in Ayleston Park and 29 in Tuckers Brook.)

- 7.5 In the time since 1996 no physical alterations have been made to Brownston Street, the surrounding distributor roads or the A379 in the town centre to improve access and traffic flow although the volume of traffic using these roads and amount of congestion has increased exponentially.

- 7.6 Although DCC Highways do not explain why 108 dwellings are considered to be acceptable in 2020, whereas only 50 were considered appropriate in 1996, it is pertinent to note their final comment:

“Separately – Although there are no objections to the Ayleston Park site, the Highway Authority is of the view that the Penn Park allocation remains an appropriate development site, provided that safe and suitable access can be achieved for pedestrians and cyclists.”

8. CONCLUSION

- 8.1 On each and every criterion examined, Site C is a less suitable site for development than the JLP allocated site at Pennpark, as recognised and determined by the Planning Inspectors who were appointed to examine the Plymouth and South West Devon Joint Local Plan.

- 8.2 Nothing in the “Modbury ‘East of Ayleston Park’ Feasibility” produced by MPC/MNPG would suggest otherwise. Indeed, much of the evidence submitted during the re-consultation reinforces the view Pennpark is the appropriate development site for the 40 unit allocation.

- 8.3 Having regard to the principles of “localism”, SHDC indicated they would not object to substitution of their preferred site at Pennpark, as determined in the adopted JLP, provided four specific conditions are satisfied in respect of an alternative site and providing there is clear evidence and support for the change. This is plainly not the case. The voluminous responses to the Modbury Parish Neighbourhood Development Plan Area consultation far exceed the norm for Neighbourhood Plan Consultations under Regulation 16 and demonstrably show Policy MNP3: Development Site Proposals is divisive and has split the community.

- 8.4** Finally, I would observe that it is reprehensible at this late stage in the process, within a couple of days of the third consultation period closing, that the indicative layout plan submitted by MPC/MNPG has again been revised – see Addendum to the Outline Heritage Summary of today's date submitted by Matt Jackson of Land & Heritage. It should be noted this revision, like previous proposals, has not been costed and there is no analysis of the economic viability of the proposed development. Furthermore, Land & Heritage have failed to state who commissioned this report and their original report, Outline Heritage Summary dated November 2020. This last-minute substantive change allows no time for residents to give these proper consideration or to make comment.

Stephen Crocker BSc (Est Man) FRICS
18 December 2020