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Our Ref:
Your Ref:
3/19/1045/OUT
Date: 9th
August 2019

App. No: 3/19/1045/OUT

Location: Land North Of The Stort Valley And The A414, Gilston, Hertfordshire

Dear Adam,

Outline planning with all matters reserved apart from external vehicular access for the redevelopment of the site through the demolition of existing buildings and erection of a residential led mixed use development comprising up to 8,500 residential homes including market and affordable homes; retirement homes and extra care facilities; a range of community uses including primary and secondary schools, health centres and nursery facilities; retail and related uses; leisure facilities; business and commercial uses; open space and public realm; sustainable urban drainage systems; utility and energy facilities and infrastructure; waste management facilities; vehicular bridge links; creation of new vehicular and pedestrian accesses into the site, and creation of a new vehicular, pedestrian and cycle network within the site; improvements to the existing highway and local road network; undergrounding and diversion of power lines; lighting; engineering works, infrastructure and associated facilities; together with temporary works or structures required by the development

Thank you for consulting Harlow Council on the outline planning application described above. We welcome the opportunity to provide comments.

Harlow Council has been working collaboratively with East Hertfordshire, Epping, Essex and Hertfordshire authorities through the duty to co-operate as part of Local Plan preparation and even more closely since the area was awarded Garden Town status in 2017. The Garden Town will deliver significant growth in and around Harlow which is comprehensive, sustainable, supported by necessary infrastructure, consistent with Garden City Principles, and respectful of the existing form and layout of, and well-integrated with, Harlow New Town.

The Gilston Garden Community is one of four strategic sites to be brought forward in the Garden Town alongside residential developments, employment, community facilities and infrastructure in the urban area of Harlow.

The application is for 8,500 homes in the form of six villages. A further 1,500 homes are proposed to the west of the site at a seventh village, bringing the total up to 10,000 homes. The seventh village will be subject to a separate application and will be made by another applicant.

The application sets out that the Parameter Plans, Development Specification and Strategic Design Guide are for approval. In effect, this means that the applicant anticipates that the development will be required to be carried out in full accordance with the content of those documents. In addition, the applicant anticipates that a Section 106 Legal Agreement will be entered into and that an approval will be subject to conditions. Drawings are also submitted for three primary vehicular access points into the site, for which full approval is sought.

Two detailed applications for the Central Stort Crossing and Eastern Stort Crossing have also been submitted. As Harlow Council is a determining authority for those applications this response is submitted in relation to the outline application only.

The outline application will be determined against a suite of policies in the East Herts District Plan (EHDP) and supporting documents but most notably policy GA1 which sets the principles and requirements for the Gilston area.

The Harlow Local Development Plan Pre-submission (HLDP), currently at Examination, includes policy HGT1 on the Garden Town. This policy has been developed in order to provide a co-ordinated and consistent policy approach towards the consideration of strategic development proposals and to complement policy GA1 set out in of the EHDP. Policy HGT1 sets out a series of principles which Harlow seeks to secure in all new Garden Communities including Gilston.

Policy HGT1 has been informed by documents and strategies prepared by the Garden Town and the overall policy approach set out in the HDLP. This includes the Garden Town Vision and Design Guide, the Infrastructure Delivery Plan for the Garden Town (GTIDP), work on the Sustainable Transport Corridor and the emerging Harlow and Gilston Garden Town Transport Strategy.

The Council expects the proposal to be in accordance with policy HGT1 and the Garden Town documents and strategies. Importantly, this includes 60% of all journeys being by sustainable modes and the provision of all the infrastructure requirements identified as needed for the development.

1. Parameter Plans

- 1.1. It is recommended that the Parameter Plans are audited to ensure that they secure only the aspects of the development which are intended to be secured. Examples of inconsistencies are included in the following paragraphs.
- 1.2. Parameter Plan 2 details Ecological Buffers to be provided as part of the development, however, the Development Specification suggests the buffers are indicative at paragraph 4.3.8. This should be clarified.
- 1.3. Parameter Plan 3 shows the Sensitive Development Area, Community Sports Areas and Community Play Areas secured in specific locations whilst the remaining green infrastructure and open space is subject to detailed design. Presumably the location and extent of the Sensitive Development Area and the community areas will be dependent on the final location and extent of the developable areas and green infrastructure. It is recommended the status of these items is reviewed.
- 1.4. Parameter Plan 4 fixes the location of the Primary Vehicular Corridor with limits of deviation of +/- 30m shown on the plan. As the village boundaries and the green infrastructure around them would not be fixed by the Parameter Plans (see comments on Parameter Plans 3 and 5), it is recommended that additional flexibility is provided to enable the Primary Vehicular Corridor to be influenced more freely by the Village Masterplanning stage and this will enable site sensitivities and constraints to be taken into consideration.
- 1.5. In addition, Parameter Plan 4 does not show the Primary Bus Corridor linking village 5 to village 1 and, given the range of uses which are proposed to be within village 1, it would be appropriate for the corridor to link to the villages. This would also help contribute to the sustainable mode share target. It is critical that green infrastructure and open space is well-connected.
- 1.6. Point 4 of Parameter Plan 4 ('Connection of the Primary Vehicular Corridor to Village 7') is not but presumably should be marked as indicative. The Primary Bus Corridor to villages 6 and 7 is currently proposed to be fixed, however, a connection for buses to the A414 for these villages must be made. It needs to be clear that the route will be through village 6 if it is not provided through village 7 (provided the transport impacts of this are determined to be acceptable).

- 1.7. Parameter Plan 5 shows that the Village Developable Areas are subject to detailed design, however, the land uses within them are not. Clearly the land uses currently shown at the edges of the village boundaries must be flexible too.
- 1.8. Parameter Plan 6 shows that the majority of the buildings can be up to 15m high based on existing AOD, however, it also enables finished ground levels to be 2m below existing AOD. It is therefore possible for the properties to be up to 17m in height.
- 1.9. In addition, Parameter Plan 6 also enables a proportion of taller buildings to be provided within each village, generally within but occasionally beyond the proposed village centre areas. The Development Specification states that within these zones, *'no more than X% of the building footprint within the maximum height zone of Village X shall reach the maximum height of 18m'*. This suggests that the entirety of the maximum height zone could be up to 17.9m.
- 1.10. It is noted that no reference is made to multi-storey car parks and many non-residential uses regarding potential building heights. Some buildings may need to be considerable in scale. It is recommended that additional consideration be given to the location and form of some of the potentially more substantial buildings.
- 1.11. Furthermore, Parameter Plan 6 expresses the permissible heights of buildings as AOD, however, the 'Area of additional height control' is expressed as a building height of 11m. The plan also refers to 5 storey development being permissible within the maximum height zones, however, no reference is made to storey heights within the Development Specification. It is considered that clarification should be provided as to how building heights will be controlled by Parameter Plan 6 and the Development Specification and that the heights of properties are expressed more clearly and consistently.
- 1.12. In conclusion, the Parameter Plans should be comprehensively reviewed to ensure they are accurate, consistent and, in conjunction with the other documents for approval (and particularly the Development Specification, as explained below), clearly show the how the design can be developed at future stages.

2. **Development Specification**

- 2.1. It is not considered that the Development Specification sets out its commitments sufficiently clearly.
- 2.2. Table 3.1 shows the total number of residential units and the proposed amount of floorspace by use. It groups very different types of land use together and provides one floorspace allowance for the uses within each group, e.g. 'retail and related, business and leisure floorspace' would be provided over 25,100 sqm. Additionally, 'Leisure floorspace' is included in the table twice.

- 2.3. It is not clear how much floorspace is proposed for each of the uses, nor is it clear how much land is anticipated to be used. The amount (or more appropriately the lower and upper limits) of floorspace proposed for each use individually is required to be provided in order to understand and determine the acceptability of the proposal. Critically, the amount of provision for each use could fundamentally change the impacts of the development and its environmental effects.
- 2.4. In addition, there are other uses proposed within the submission, such as the Sustainable Transport Hub, which are proposed to be included within the village boundaries. There is no indication of the amount of space that will be required for uses such as this, nor the effect that these uses would have on the provision of the floorspace identified in table 3.1.
- 2.5. Paragraph 4.6.4 states that *'retail, commercial and community uses will provide active ground floor frontages in appropriate locations. It will be permissible to provide some mixed use floorspace outside the zones identified, but the focus should be within the zones specified'*. The extent to which mixed use floorspace may be provided outside the zones, the circumstances in which exceptions will be made, the types of mixed use floorspace intended to be permissible outside of the zones, and whether any of the other non-residential uses included in table 3.1 would be permissible should be clarified. Rather than specify the precise extent of the Education and Mixed Use Zones (Parameter Plan 5 does not provide for any flexibility in these areas) it would be more appropriate to adopt a more flexible approach to the boundary of the zones. This would reduce the need to provide for exceptions such as that facilitated by paragraph 4.6.4.

3. **Strategic Design Guide (SDG)**

- 3.1. It is considered that the SDG should include an opening section which explains how language within the document should be interpreted. For example, does "the development should" mean that "the development will without exception" or that "the development might potentially"? The wording seems to be used interchangeably and the choice of words used significantly affects the intention behind the document, especially the Strategic Principles. The wording should be consistent.
- 3.2. The SDG also seemingly refers to both Village Design Guides and Design Codes interchangeably (e.g. see p13 text and the adjacent diagram). This, and the interrelationship between the Design Guides and Design Codes, should be clarified.
- 3.3. The illustrations of each village within the Village Principles are not labelled as illustrative and, as set out later in this report, conflict with the Parameter Plans. It appears that some of the illustrations cannot realistically be achieved based on the

limitations imposed by the other documents for approval. It is therefore recommended that an audit is undertaken to ensure that the illustrations reconcile.

3.4. The illustrations fail to include important matters which should influence the principles, such as the green infrastructure and open space identified as being within the village boundaries at 3.6 of the Development Specification.

4. **Section 106 Legal Agreement (draft S106)**

- 4.1. The draft S106 includes the infrastructure considered by the applicant to be required in order to make the development acceptable. The infrastructure seems to have been copied directly from the submitted Infrastructure Delivery Plan (IDP).
- 4.2. The draft S106 is clearly at an early stage and will need to be informed by the consultation responses from various parties and expanded upon in order to make it workable in terms of mechanisms, referencing and definitions etc. The approach to land assembly also requires further discussion.
- 4.3. In particular, additional work on the trigger points for the infrastructure is required. It is considered that early delivery of infrastructure would be extremely beneficial and it is essential that infrastructure required to change transport habits is provided up front in order to ensure that the modal shift target is achieved. Infrastructure which will significantly influence the need to travel, e.g. education provision, should be provided as soon as possible and in time to meet the needs of residents.
- 4.4. Critically, the infrastructure included within the draft S106 does not appear to accord with the infrastructure requirements set out within the GTIDP. For example, a commitment is made to provision of the 'Sustainable Transport Corridors', however, this is defined as the provision of the route from Eastwick roundabout to Burnt Mill Roundabout, which is far more limited in scope than the requirements for the Sustainable Transport Corridors as described in the GTIDP. SEND provision is another obvious omission.
- 4.5. As set out elsewhere in this letter, commitments are made within the application to provide additional infrastructure, however, these commitments are not proposed to be secured by the draft S106. Furthermore, many of the commitments are made in supporting documents, rather than those submitted for approval.
- 4.6. Additionally, many of the commitments are proposed to be provided following outline permission having been granted. Clearly, any infrastructure requirements necessary to make the development acceptable must be secured at outline application stage, even if the commitments are secured via mechanisms which provide for ongoing reviews.

- 4.7. A comprehensive review of the IDP/draft S106 and the commitments made elsewhere within the application, against the infrastructure requirements set out in the GTIDP, needs to be undertaken. This is particularly important with regard to mitigation identified within the Environmental Statement. The infrastructure proposed to be provided must be clarified. It is expected that the infrastructure shown in the GTIDP as being delivered by the development will be provided in full.
- 4.8. Clause 13 of the draft S106 obliges the councils to seek contributions towards the funding of the 'Core Infrastructure' (which is defined as 'the Central Stort Crossing, the Eastern Stort Crossing, the Sustainable Transport Corridors and the Secondary Schools'). It is unclear how this is proposed to be achieved and, whilst the councils may be able to seek contributions from other developments towards this infrastructure, it is beyond the councils' control as to whether other proposals will be submitted which can provide contributions.
- 4.9. Furthermore, the GTIDP identifies the Central Stort Crossing as being part of the access strategy for Gilston in order to deliver active and sustainable access to Harlow. Its cost has been apportioned to the Gilston area (all seven villages) only and no other sites across the Garden Town. Similarly, the Sustainable Transport Corridors (as narrowly defined by the draft s106 and not by the GTIDP) are expected to be provided by the Gilston development only.
- 4.10. The Eastern Crossing has currently been apportioned across all the strategic sites in the Garden Town as it is considered a strategic highway mitigation measure. However, the GTIDP recognises the fact that there was no individual site transport modelling undertaken at the time and therefore future modelling may establish that some of the strategic sites may place a greater or lesser demand on the highway routes. It is therefore presumptuous at present for the application's IDP to assume other sites will contribute towards this (or the Central Stort) crossing.
- 4.11. It is noted that a Statement of Delivery has not been submitted as required by the Garden Town's 'How To' Guide for Planning Obligations, Land Value Capture and Development Viability.

5. **Supporting Documents**

- 5.1. Nine 'strategies' are included within the submission. Some of the strategies make commitments that the applicant claims they will deliver, however, many of the commitments lack detail on their scope and are not seemingly currently proposed to be secured in the documents for approval.
- 5.2. Furthermore, some of the strategies (e.g. Inclusive Growth and Health and Wellbeing) include specific sections on 'Securing commitments through the planning process' and state that '*the commitments that are being made now will be*

secured through the Planning Conditions in Parameter Plans, the Development Specification and the Section 106 Agreement. The Strategy will be linked to binding commitments that will be secured through that Section 106'. Some of the commitments are, however, unrelated to the Parameter Plans and are not explicitly included in nor referred to in the Development Specification nor in the draft S106. Furthermore, some commitments are outside the applicant's control (e.g. a commitment that new residents would spend £124.8m each year on household goods/services).

5.3. In particular the Health and Wellbeing Strategy makes a large number of commitments that are proposed to be provided both 'now' and 'in the future' which need further explanation and clarification as to how they will be secured. For example, there is a commitment to a partnership with Princess Alexandra Hospital to deliver services on site that complement the facilities at the new and expanded hospital. Provisions need to be included within the terms of the outline consent to achieve this. The Health Strategy also seemingly makes a commitment to 60% of trips by sustainable means (p30) which seems to conflict with information provided elsewhere in the application which sets this out as an aim.

5.4. The applicant needs to clarify its commitments including in terms of scope, timing and how they will be secured.

6. **Design and Layout**

6.1. The application is being promoted as a series of villages and references are made to the Gilston Concept Framework, however, as explained in the Council's response to the consultation on the framework, it is considered that development in the Gilston area should respect the guiding principles of Harlow New Town, as required by HLDP policy HGT1.

6.2. In particular, there should be a greater commitment to providing a layout which accords with the principle of Green Wedges. Reframing green infrastructure and open spaces to include wedges and fingers will help to achieve this, though of course the roles of wedges and fingers should also be central to layout considerations. The extension of the Green Wedge network would help to achieve a cohesive overall identity for the Garden Town whilst ensuring the development has its own character and identity. This is especially important for the southern part of the site due to its clear physical relationship with Harlow.

6.3. It is requested that the boundaries of villages 1, 5 and 6 are reviewed to facilitate extensions to the Green Wedge network. HLDP policy WE2 details the roles of Green Wedges which should be considered when reviewing the layout of the scheme.

- 6.4. Taking into account the characteristics of Gilston Park, there is the potential for a significant, strategic green space to be provided which would run from the area around the village of Gilston through the site to the parks proposed to the north-west, however, this is currently blocked by the linkage of villages 4 and 5 by the Education and Mixed Use Zone. Parameter Plan 3 shows protected Green Infrastructure between the two villages, but this would be extremely narrow and indirect, with a proportion of its width taken up by hedgerow. It is requested that villages 4 and 5 are separated by more significant, strategic green infrastructure to enable a continuous strategic green space to be provided.
- 6.5. Although the Design and Access Statement (DAS) suggests that a significant proportion of the Education and Mixed Use Zone between villages 4 and 5 will be taken up by School Playing Fields this is not secured by the documents for approval. DAS figure 293 suggests that orchard and allotments could effectively increase the buffer between villages 4 and 5, however, Parameter Plan 3 shows that orchard and allotment land would be further to the north, adjacent to Eastwick Wood Park and Parameter Plan 5 identifies the land shown on figure 293 as for orchard and allotments would actually be 'Predominantly Residential', so figure 293 does not appear to be a likely representation of how the development would be delivered in accordance with the Parameter Plans. There are similarly concerns with the accuracy of the other illustrations.
- 6.6. The Development Specification explains at paragraph 3.6.3 that village provision of green infrastructure and open space '*principally serves the villages in which it is located*', indicating that the provision identified within the paragraph will be provided within the village boundaries, however, the Village Park to be provided for village 5 is anticipated to be between, and therefore outside, villages 1 and 5. This would consequently decrease the degree of separation between the villages, which would already be close together. In addition, it is currently unclear whether Village Green Corridors will be provided as the specification only sets out that the corridors will be provided 'where appropriate'.
- 6.7. It is noted that schools and village centres will potentially be located adjacent or near to green spaces and village centres. This is supported as it accords with the principle of schools, hatches and neighbourhood centres being adjacent to Green Wedges (and Green Fingers in the HLDP).

7. **Employment**

- 7.1. Economic growth and the regeneration of Harlow is a key principle for the growth of the Garden Town and this application needs to be viewed firmly in that context. It is essential that new development provides an appropriate amount of employment space to accommodate its needs as part of the wider growth of the town.

- 7.2. EHDP policy GA1 V(q) confirms that around 5ha of employment land should be provided within the site. Although the amount of employment floorspace and number of jobs anticipated to be generated is unclear, with figures differing between documents, it appears that the amount of provision proposed is currently far below the policy requirement.
- 7.3. The applicant suggests that Harlow is the appropriate location to focus major employment floorspace and considers that opportunities for job creation are more important than the delivery of employment land. Whilst it is important that a wide range of jobs are created, it is considered that employment floorspace falling within use classes B1, B2 and B8 must be provided to ensure that a sustainable Garden Community is created and to avoid an overreliance on existing and committed employment floorspace in Harlow.
- 7.4. The Inclusive Growth Strategy estimates that around 13,000 working age people will reside within the development and states that it is expected that 1500 permanent jobs will be provided within the site in the long term. The Planning Statement and Environmental Statement suggest that around 1,540 jobs would be created, the Transport Assessment suggests 1700 jobs would be created, and the Health and Wellbeing Strategy suggests that 2000 jobs will be created. In any event, the level of jobs generated would be disproportionate to the amount of people residing within the development.
- 7.5. The Environmental Statement suggests that the majority of jobs would be generated from schools, community facilities and local shops and associated table 7.16 shows that none of the jobs created would fall with uses classes B1, B2 or B8, except perhaps 'flexible high street space' which could have a 'small scale' B1 element and could amount to up to 545 jobs. It is considered unlikely that a significant proportion of the 545 jobs would fall within B1 use based on the narrative as to job provision within the submission.
- 7.6. Furthermore, the Inclusive Growth Strategy, Planning Statement and the Environmental Statement are not submitted for approval and therefore the proposed jobs to be created above will be subject to change. As discussed above, the Inclusive Growth Strategy includes commitments and, additionally, paragraph 7.4.36 of the Planning Statement also establishes commitments in respect of 'employment floorspace', however, these commitments do not seem to be secured.
- 7.7. Whilst the SDG is submitted for approval, it would secure only one Strategic Principle which falls within Economy & Regeneration and all of the sub-principles within it have an overwhelming emphasis on placemaking of the village centres. It is considered that a far greater commitment to job creation is required in order for the proposal to meet the growth and regeneration objectives of the Garden Town.
- 7.8. Table 3.1 of the Development Specification is submitted for approval, however it needs to be expanded and explained. It is considered that explicit and

unambiguous commitments should be made to providing actual employment floorspace i.e. provision of uses falling within classes B1, B2 and B8. It is considered that employment floorspace must be considered now, not further down the line as suggested in the Inclusive Growth Strategy.

7.9. Paragraph 3.3.22 of the Development Specification sets out that the proposal includes the potential relocation of the businesses in the Eastwick Lodge Business Park (over an indeterminate amount of floorspace), the provision of up to 8,500 sqm of 'employment floorspace', and the provision of a further 5,000 sqm of employment space 'subject to the outcome of a needs assessment'. Paragraph 7.4.36 of the Planning Statement expands on the specification, explaining that the relocated businesses may equate to 1,500 sqm employment floorspace, that 1,500 sqm would be cultural/art function space and that the needs assessment would occur following completion of the other floorspace mentioned and the occupation of 3,000 homes within Gilston Park Estate. It is concluded that up to 15,000 sqm of employment space could be provided.

7.10. It is considered that a commitment has only actually been made to the provision of 8,500 sqm of employment floorspace and that this could potentially be lower still if the cultural/art function space falls to be within an employment use class. In addition, it is noted that the businesses relocating from the Business Park are unlikely to be categorised as being within use classes B1, B2 or B8. Moreover, given the approach to job creation explained above, it is not clear whether the employment floorspace stated within the Development Specification would actually be within B1, B2 or B8 use. In addition, more information must be provided in terms of the employment floorspace proposed to be subject to the outcome of a needs assessment.

8. **Housing**

8.1. The Council expects the provision of affordable housing to be secured in accordance with the local plans and national guidance.

8.2. It is acknowledged that the application has taken into consideration the needs of Harlow in determining an approach regarding house types and tenures. In particular, it is noted that affordable rented homes would be set at the equivalent of 50-65% of market rented homes. This is supported as it would deliver a fairer offer of housing which enables far larger numbers of tenants to access homes that they can afford. However, notwithstanding this, as set out at figure 7 of the Housing Strategy a significant proportion of households in Harlow have incomes far below £30,000 and there is still considered to be a need for social rented housing within the Garden Town. Inclusion of social rented housing would therefore be beneficial. The Council would welcome further engagement in respect of the affordable housing mix.

8.3. In terms of living standards, Schedule 9 of the draft S106 suggests that at least 5% dwellings shall be designed so that they can be easily adaptable to meet the “Wheelchair Housing Standard”. It is expected that the development will comply with the EHDP and HLDP in terms of provision of M4(2) and M4(3) category dwellings.

9. **Highways and Sustainable Travel**

9.1. It is considered extremely important to support, deliver and encourage modal shift at the very early stages of the Gilston development. The sequencing of the villages must, through appropriate measures, contribute towards the mode share targets as set out in the Transport Strategy for the Garden Town.

9.2. The application seems to propose the 60% sustainable travel mode share as an aim but it does not confirm how it will actually to be achieved. The lack of employment provision within the site compounds this concern as internalisation of trips will be limited by the lack of employment opportunities in the site, identified as only being 5% within the Transport Assessment.

9.3. The interim access arrangements must promote sustainable travel from the outset; this does not appear to be proposed. Furthermore, as full permission is sought for the accesses additional information such as landscaping and sectional details should be submitted for consideration.

9.4. Initiatives within the Sustainable Movement Strategy and elsewhere are included, however, the initiatives are only briefly explained and broad in scope. The SDG includes one Strategic Principle relating to Sustainable Movement and none of the design commitments have a strong relationship with how the mode share target will be achieved.

9.5. Infrastructure such as the provision of a northern access to the train station is included in the draft S106, however, the level of contribution offered is not included and there is no comfort that provision of the access will be achievable or delivered early enough to change travel habits.

9.6. Moreover, no detailed technical analysis on how 60% mode share will be achieved seems to have been undertaken. For example, explanations need to be provided as to how the proposed parking provision will influence private car use. The Transport Assessment includes a mode shift of 20%, however, the lack of commitments to sustainable transport within the application raise concerns that this is not an appropriate approach.

9.7. There are concerns that, based on the information submitted, the goal of 60% sustainable mode share will not be met.

10. Conclusion

- 10.1. The Council is supportive of development within the Gilston Area, as identified in the Harlow Local Development Plan and Garden Town documents and strategies, however, a number of matters have been identified in this response which need to be addressed before the Council can determine whether it is supportive of this particular scheme.
- 10.2. Most significantly, concerns regarding infrastructure provision, employment floorspace, connections to the Green Wedge network and commitments to achieving sustainable mode share targets need to be addressed.
- 10.3. It should therefore be noted that this response does not preclude Harlow Council from making further comments to support decision making on this application.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Andrew Bramidge', with a stylized flourish at the end.

Andrew Bramidge

Head of Environment & Planning

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