

Appendix B

Harlow and Gilston Garden Town Harlow and Gilston Garden Town Infrastructure Delivery Plan Memorandum of Understanding

~~Draft 5~~Draft 6 | ~~17 February 2022~~27 April 2022

Draft

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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Appendix A

Draft Harlow and Gilston Garden Town Infrastructure Funding Statement

Appendix B

~~List of consulted stakeholders~~

1. Introduction

- 1.1. This Memorandum of Understanding (“MoU”) concerns the purpose, use and process for periodic review of the Harlow and Gilston Garden Town Infrastructure Delivery Plan (“HGGT IDP”). This MoU is prepared for the Harlow and Gilston Garden Town (“HGGT”) Authority partners which comprise Epping Forest District Council (“EFDC”), East Hertfordshire District Council (“EHDC”), ~~Epping Forest District Council (“EFDC”)~~, Harlow District Council (“HDC”) and Essex County Council (“ECC”) and Hertfordshire County Council (“HCC”), hereafter referred to collectively as ‘the “HGGT Authority partners”’. The MoU has been prepared in consultation with officers of these authorities.

Joint working

- 1.2. The HGGT Authority partners have agreed to work with one another and with relevant working groups and partners, to ensure the funding and delivery of strategic infrastructure requirements impacting on the Garden Town, while considering the cross-boundary implications.
- 1.3. The successful delivery of the Garden Town needs to be underpinned by a comprehensive package of infrastructure, phased and delivered in a timely way, ahead of, or in tandem with the development it serves. This necessitates a coordinated approach across local authority boundaries and between Districts and Counties and the involvement of a range of partners, including the site owners/promoters, infrastructure providers and other stakeholders. The HGGT IDP will represent a ‘snapshot in time’ of infrastructure needs through bringing together evidence ~~base that will bring together~~ into a single place for a range of different infrastructure considerations and, in doing so, support a consistent approach to understanding and planning for infrastructure requirements in order to support growth and regeneration.

Purpose of the Memorandum of Understanding

- 1.4. The HGGT Authority partners have committed to the principle of growth in and around Harlow in consideration of the Garden City Principles and have set out a Vision for this growth (“the HGGT Vision”):

“The pioneering New Town of Gibberd and Kao will grow into a Garden Town of enterprise, health and sculpture at the heart of the UK Innovation Corridor. Harlow and Gilston will be a joyful place to live with sociable streets and green spaces; high quality homes connected to fibre optic broadband; local centres accessible by walking and cycling; and innovative, affordable public transport. It will set the agenda for sustainable living. It will be adaptable, healthy, sustainable and innovative.”

- 1.5. In total, it is anticipated that over 16,000 new homes will be delivered by 2033, increasing to over 23,000 by 2040 through regeneration within

Harlow and the creation of four new garden communities comprising the Gilston Area (10,000 homes), East of Harlow (3,350 homes), Latton Priory (1,050 homes) and Water Lane (2,100 homes). In order to deliver this scale of planned growth and regeneration- sustainably and in accordance with the HGGT Vision and Policies, the timely delivery of appropriate types and levels of infrastructure is important.

- 1.6. The HGGT Authority partners have prepared a joint Infrastructure Delivery Plan as an evidence base for the main types and quantum of infrastructure considered necessary to assist in bringing forward this transformational growth and regeneration at HGGT. The first HGGT IDP was published in 2019 and the first review of this evidence was commenced in 2021/22. The purpose of the MoU is to set out;
- a) how the HGGT IDP will be used by the HGGT Authority partners;
 - b) the relationship between the HGGT IDP and the respective Councils' IDPs, relevant Guides to Developer Contributions, and their respective status; and
 - c) an agreed approach to preparing the HGGT IDP and to maintaining the information contained within asthe up to date through periodic review.

2. How the HGGT IDP will be used

- 2.1. The HGGT IDP will be used to provide an evidence base to support the delivery of development allocations and support the application of policies within the Local Plans of EFDC¹, EHDC, ~~EFDC~~²-and HDC.

Evidence base to support Local Plans and their delivery

- 2.2. The HGGT IDP is a key document to ensure that the HGGT Vision and the policy objectives and spatial strategy of the Garden Town area, as set out within the Local Plans and other guidance, are being effectively delivered, particularly regarding sufficient and comprehensive infrastructure delivery.
- 2.3. **The HGGT Authority partners, whether acting jointly or individually and where appropriate, agree to consider the HGGT IDP as part of a supporting evidence base for the Garden Town area when:**
- a) preparing supplementary planning and delivery guidance;
 - b) preparing policies through review, or replacement, of Local Plan(s);

¹ At the time of drafting: the East Herts District Plan had been adopted in October 2018 and the Harlow Local Development Plan had been adopted in December 2020 whilst the Epping Forest District Local Plan was still under Examination awaiting the Inspectors final report.

² At the time of drafting: the East Herts District Plan had been adopted in October 2018 and the Harlow Local Development Plan had been adopted in December 2020 whilst the Epping Forest District Local Plan was still under Examination awaiting the Inspectors final report following conclusion of the Examination in Public.

- c) preparing a Community Infrastructure Charging Schedule, or similar, pending any planning reforms;
 - d) preparing, engaging with, or assessing masterplans for areas of growth or regeneration;
 - e) assessing planning applications for growth and regeneration allocated within the Local Plan(s);
 - f) assessing planning applications for growth or regeneration that have not been specifically allocated within the Local Plan(s), as defined in the NPPF as Windfall Sites;
 - g) preparing Council-led growth or regeneration or infrastructure improvement works;
 - h) preparing capital works budgets or applications for public funding.
- 2.4. A key element of the masterplanning and planning application process will be to establish in more detail how the specific infrastructure required for each development allocation or windfall site will be delivered, using the entries in the HGGT IDP as a first step to understanding both on-site and off-site infrastructure requirements. In some instances, the delivery of those sites may also be in discrete masterplanned phases.
- 2.5. The HGGT IDP will present a “~~snapshot~~ **snapshot** in time” picture only with further consultation with the key infrastructure providers required as the planning and design process progresses to refine the infrastructure required to meet the needs, and mitigate the impact, of developments.
- 2.6. The HGGT How To Guide to Planning Obligations, Land Value Capture and Development Viability (April 2019 or any successive update or replacement) directs applicants to support ~~submitted~~ planning applications (for all major applications) with a proposed draft heads of terms for a section 106 agreement and a statement of delivery. This directs applicants to make specific reference ~~as~~ **as** to how the development scheme, including its proposed associated legal agreement, will bring about delivery of the required infrastructure, reflecting the content of the HGGT IDP or any updated or new infrastructure information as may have been obtained. Such information will be reviewed as part of the application process to take account of any further information provided through consultation or assessment of the application.
- 2.7. Where Windfall Sites come forward applicants are still directed to follow the guidance set out in the HGGT How To Guide to Planning Obligations, Land Value Capture and Development Viability (April 2019 or any successive update or replacement).

Negotiation with developers

- 2.8. Where infrastructure is necessary to enable delivery or to make development acceptable in planning terms, obligations, including where necessary financial contributions, will generally be expected from developers, within

the framework set by the tests for planning obligations in Regulation 122 of the CIL Regulations and reflected in the NPPF.

- 2.9. Where infrastructure is required to mitigate the development impacts from more than one sites, the HGGT IDP may, where appropriate, be used as evidence to determine the extent of Section 106 obligations expected from any single development taking into consideration any other reasonable evidence available.

3. Relationship with existing IDPs

- 3.1. Individual IDPs have previously been prepared by each of the District Councils alongside preparation of their respective Local Plans. The District Council IDP Schedules present the infrastructure needs to ensure that all development is policy compliant, in relation to the level of social and physical infrastructure required to serve the needs of the additional population in their respective District area only. In preparing the HGGT IDP in 2019, the findings from the individual District Council IDPs were collated in so far as the infrastructure requirements were specifically relevant to the planned growth at the Garden Town to create a separate HGGT IDP Schedule.
- 3.2. It is expected that the District Councils may require, from time to time, updated information on a District wide basis of the infrastructure needs and progress toward such infrastructure delivery.
- 3.3. **In order that the process for preparing IDPs is co-ordinated to present a consistent evidence base and efficient way of working the HGGT Authority partners, as indicated below, agree to:**

a) EFDC will continue to update their individual IDP from time to time as they deem necessary with engagement with ECC and consultation with EHDC, HDC and HCC (and others) where necessary. In regard to infrastructure needs associated with the East of Harlow, Latton Priory and Water Lane allocations, forming parts of the Garden Town, the EFDC IDP shall either signpost to, or recreate, the latest infrastructure schedules as far as they pertain to their District as contained within the HGGT IDP;

a)b) EHDC will continue to update their individual IDP from time to time as they deem necessary, with engagement with HCC and consultation with EFDC, HDC and ECC (and others) where necessary. In regard to infrastructure needs associated with the Gilston Area allocation, forming a part of the Garden Town, the EHDC IDP shall either signpost to, or recreate, the latest infrastructure schedules as far as they pertain to their District as contained within the HGGT IDP;

~~b)a) EFDC will continue to update their individual IDP from time to time as they deem necessary with engagement with ECC and consultation~~

~~with EHDC, HDC and HCC (and others) where necessary. In regard to infrastructure needs associated with the East of Harlow, Latton Priory and Water Lane allocations, forming parts of the Garden Town, the EFDC IDP shall either signpost to, or recreate, the latest infrastructure schedules as far as they pertain to their District as contained within the HGGT IDP;~~

- c) HDC shall at their discretion either choose to rely upon the HGGT IDP for their District IDP needs, recognising that it encompasses the whole of the District area within its assessment of infrastructure or, may recreate the latest infrastructure schedules as far as they pertain to their District as contained within the HGGT IDP;
- d) Should any of the District Councils choose at their discretion to recreate information from the HGGT IDP into their respective District IDP, the date and version of the information source must be clearly indicated and a statement declaring that such information shall be deemed superseded in the event that an updated HGGT IDP is published, making clear that the HGGT IDP shall take precedence.
- e) Should, for any reason ~~EFDC~~, EHDC, ~~EFDC~~ or HDC consider it necessary to prepare its own District IDP that might update or change information contained within the latest published version of the HGGT IDP (for example to support a Local Plan review) or ECC or HCC consider it necessary to prepare any similar County infrastructure plan, that Council shall first consult with the other HGGT Authority partners and have due regard to their representations before coming to a decision. Where agreed appropriate and possible there will be a general presumption in favour of updating the HGGT IDP instead of , or in parallel with, any other IDP to ensure it continues to represent the latest published information.
- f) The HGGT Authority partners agree that nothing set out above constraints or prevents any partner, acting together or individually, from presenting or taking into account any new or updated infrastructure evidence, for example following completion of assessments or in response to engagement with developers or consultation with stakeholders. The HGGT IDP when published shall present a “snapshot in time” picture only.

4. Agreed methodological approach

4.1. When preparing the HGGT IDP, unless otherwise agreed by the HGGT Authority partners, it shall:

- a) seek to be programmed cognisant of potential sensitivities around timing of engagement and publication, for example, seek to avoid or seek to positively engage with Local Plan preparation;

- a)b) accord with current national policy requirement and best practice;
- b)c) reflect and support the planned level and location of growth and regeneration at the Garden Town as set out within the respective District's Local Plans, the delivery trajectory for this growth and, where relevant, other committed developments;
- e)d) represent an up to date picture of infrastructure need based upon a proportionate evidence base **with a general presumption to review the HGGT IDP every two years.** For the avoidance of doubt, this shall not constrain any HGGT Authority Partner or other Stakeholder from presenting updated information at any other time in accordance with 3.3 (f);
- e)e) draw on existing data wherever possible in order to provide a consistent and transparent approach;
- e)f) as far as practically possible ensure that all infrastructure requirements for "off-site" infrastructure or financial contributions are costed based upon assessments or appropriate benchmarks (acknowledging that costs may change);
- f)g) demonstrate that all reasonable sources of funding have been considered and highlight where the cost of infrastructure cannot be met by other suitable funding mechanisms resulting in any potential funding gap and consider sources for how this might be addressed;
- g)h) provide a strong **and robust** evidence base and justification for active or potential grant funding applications for infrastructure schemes to support the delivery of the spatial strategy for the Garden Town area;
- h)i) be supported, where considered necessary, by an assessment of the viability of development. Examples of potential reasons to consider viability during the review of the HGGT IDP are where the evidence is being used to support the examination of policies in a Local Plan; where evidence received suggests significant potential increases on costs apportioned to development (after allowance for inflation); or where might otherwise be agreed as prudent for example to reflect any perceived changes in circumstances since Viability was last assessed;
- i)j) seek opportunities to improve the form and function of the HGGT IDP to take account of new techniques or technologies and where this is identified as of benefit to the work of the HGGT Authority partners or engagement with infrastructure stakeholders, developers or to better articulate the plan for meeting infrastructure needs to the existing and future community of the Garden Town.

4.2. The HGGT IDP, unless otherwise agreed by the HGGT Authority partners, shall comprise:

- a) the scale or nature of "on site" infrastructure required to support planned growth and regeneration within a new development, for example the scale and types of new open space or sustainable mobility

infrastructure where it is felt necessary to present this to accord with adopted policy and guidance but where the value of the schemes are not considered necessary to be identified in the IDP as they form part of the general development costs;

- b) the scale, nature and any financial contribution required for “on site” infrastructure to support planned growth and regeneration within a new development, for example the type, nature and financial contribution associated with a new school;
- c) the scale, nature and any financial contribution required for “off site” infrastructure to support planned growth and regeneration, for example a highway improvement scheme, even where works may be expected to be undertaken by a Developer;
- d) the source of evidence for the infrastructure item including where possible an appendix or link to documents or submissions received from infrastructure providers;
- e) the anticipated phasing of the infrastructure (where known) based on the known delivery trajectory of the planned or committed growth and regeneration of the Garden Town that is dependent upon that infrastructure or on the known programme for or progress of delivery of the infrastructure itself;
- f) the expected party responsible for delivery of the infrastructure where this is known;
- g) the indicative costs of the infrastructure and the source of such costs;
- h) the expected sources of funding for the infrastructure including any funding already secured;
- i) the anticipated apportionment of costs to planned developments and the methodology that has informed this, including how the cost of an item of infrastructure has been reasonably and equitably apportioned to more than one development;
- j) where contributions may be expected from unplanned Windfall Sites and, where possible, any estimates for the potential scale of such funding (noting that the infrastructure needs for unplanned development, due to its nature, cannot be expected to be comprehensively considered in the HGGT IDP);
- k) whether costs apportioned to development are expected to be index linked (which should generally be assumed to be the case), the base date for those costs from which indexation may be expected to apply and the relevant index expected to be used;
- l) whether any additional allowance of costs in the HGGT IDP has been included, the scale and reason;
- m) the scale of potential funding gaps for infrastructure where the funding need is not identified as fully committed;

- n) a prioritisation of infrastructure based upon an agreed methodology.

4.3. **The HGGT IDP, unless otherwise agreed by the HGGT Authority partners, shall be prepared through engagement:**

- a) supported by a concise statement of the scope of the proposed review and any other information deemed material or useful to the stakeholder being contacted;
- b) with the services, where relevant, of each of the HGGT Authority partners, for example highways or education;
- c) with other statutory infrastructure providers, for example key utilities providers and the Princess Alexandra Hospital Trust;
- d) with other statutory bodies responsible for setting standards, for example the local Clinical Commissioning Group or Sport England;
- e) with developers or landowners of very large allocated development sites;
- f) generally with those stakeholders as identified within Appendix B of this document and as may be updated from time to time;
- g) using, for example, a pro forma in order to standardise responses and ~~evidence to~~ improve the quality and transparency of evidence and reduce the time necessary for review;
- h) based upon clear timescales and deadlines with, where possible, advance notice provided such as timing the reviews to occur at regular defined intervals;
- i) using meetings, where considered useful to interrogate and better understand evidence;
- j) using other existing engagement processes, for example the HGGT Developer Forum, including where appropriate doing so instead of individual engagement;
- k) using up to date information contained within other assessments, including where appropriate doing so instead of direct engagement, for example to reflect positions agreed through a planning consent and section 106 legal agreement for a development site or through a comprehensive infrastructure study in which stakeholders had already been engaged;
- l) that seeks to understand “significant” changes that are supported by appropriate and robust evidence and considered necessary to be reflected in a review of the IDP. Whether new evidence received is deemed “significant”, “appropriate” or “robust” such that it is reflected in a review will be at the discretion of the HGGT Authority partners.
- m) with submissions received to be made available alongside the reviewed HGGT IDP within a reasonable time after its publication or

after request unless such information is deemed confidential in nature, whereupon a redacted provision will be provided where possible.

4.4. In order to support the preparation and periodic review of the HGGT IDP each of the HGGT Authority partners agree to use best endeavours to:

- a) resource the work to review the HGGT IDP according to any agreed commitments made on the commissioning of such work, including providing representation for each partner for the HGGT IDP working group;
- b) respond to information requests on behalf of all relevant services in a timely manner in accordance with any agreed commission programme. Where possible such response should be provided as a single comprehensive submission that has first been cross-checked to resolve any internal conflicts or overlaps of information;
- c) provide appropriate detail and evidence supporting any infrastructure needs in a form that can be published with the HGGT IDP to present a robust and transparent document in accordance with any agreed commission process;
- d) establish appropriate working processes within services that, where practical, supportare cognisant of the desire to agreed preparation of periodic reviews of the HGGT IDP and, where appropriate and reasonable, to align the timing of such processes to support the timely provision of updated information to any agreed periodic review and to inform HGGT Authority partners of any work that is being undertaken that might need to be considered when establishing the programme for any HGGT IDP review;
- e) work positively and cooperatively to reach collective agreement on the content of the HGGT IDP;
- f) acknowledge and publish the HGGT IDP without unreasonable delay following agreement of acceptable completion of any review in accordance with any agreed approval process;
- g) to raise awareness of the completion of any HGGT IDP review within any relevant internal services or with external partners to help ensure up to date version control and appropriate use of the document.

Apportionment

- 4.5. The HGGT Authority partners agree that apportioning infrastructure costs to contributing developments will continue to be a fundamental part of the HGGT IDP. This identifies how the costs of infrastructure which serves more than one site would be apportioned between the relevant sites and the collection mechanisms that would be used in order to provide a transparent and equitable understanding for developers/landowners and the community

and to assist the preparation and assessment of masterplans and planning applications. Where an item is strategic (in other words, it serves more than one site in the Garden Town and, in some cases, other sites beyond the Garden Town), it has been necessary to make assumptions about which sites it will serve/will benefit from it.

- 4.6. The approach to apportionment will depend on the level of evidence on the scope and cost of the infrastructure item available at the time of the review of the HGGT IDP, this therefore may be subject to change. Where relevant it will be noted in the IDP Schedule that further design and cost information may become available which will be reflected in future reviews.
- 4.7. The HGGT Authority partners agree that the general principles underpinning apportionment are as follows:
- a) Infrastructure interventions should be matched to those development(s) which result in that intervention being required;
 - b) Contributions should be equitable between developments, in proportion to the scale of the development and level of impact or generated demand;
 - c) The approach should be consistent with District Policies, the Essex Developers' Guide to Infrastructure Contributions and Hertfordshire's Guide to Developer Infrastructure Contributions, plus any other national or local guidance.
- 4.8. The first stage of apportionment will be to match interventions with the developments, through consultation and evidence base information such as transport modelling, existing and likely future travel to school patterns and school catchments, (i.e. Priority Admissions Areas, as these are known). Apportionment approaches should be based upon the best ~~available~~ information available at the time that the ~~future~~ updates are ~~published~~ prepared.
- 4.9. Contributions should be proportional to the level of impact or generated demand resulting from the planned growth based on ~~indicators such as~~ likely trip generation, housing unit numbers, child yields and occupation data. The methodology for apportionment will vary by infrastructure type and the approach in future updates may need to be revised where appropriate, upon agreement across the HGGT Authority partners.
- 4.10. Any changes to national planning policy and legislation will be reflected in the future HGGT IDP reviews, for example, proposals within the 2020 Planning for the Future White Paper³, and subsequent amendments as it progresses through government.
- 4.11. Developer contributions towards infrastructure projects may need to be collected from sites within different local authority administrative areas, and

³ Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/958420/MHCLG-Planning-Consultation.pdf

sites which do not fall within the Garden Town. An example of this is secondary school provision which reflects school planning areas that are not defined by district authority borders. The HGGT Authority partners will work together to ensure the necessary contributions are collected in a consistent and meaningful way and spent on appropriate infrastructure items.

5. Implementation and monitoring

- 5.1. IDPs are, by their very nature, a ‘snapshot in time’, and as different infrastructure providers respond to their own unique challenges, the information that they provide will naturally date and alter over time. As such, the HGGT Authority partners have committed to frequent reviews of the HGGT IDP going forwards to ensure it reflects ongoing work, captures major new infrastructure requirements, and reflects changes in service delivery.
- 5.2. The preparation of Infrastructure Funding Statements (IFS) is now a requirement for all local authorities following the latest amendment to the Community Infrastructure Levy (CIL) Regulations (2010), which came into force on 1 September 2019. The regulations state that the IFS should include details of how much money has been raised through developer contributions, both from CIL and Section 106 planning obligations, and how it has been spent. A full list of the matters to be included in IFSs is set out in Schedule 2 of the CIL Regulations.
- 5.3. The HGGT Authority partners agree:
 - a) to jointly contribute to and prepare a HGGT IFS annually which will collate infrastructure data in a consistent way, and in a single statement for the Garden Town that aligns with the HGGT IDP;
 - b) for the information in the HGGT IDP and HGGT IFS to be presented in such a way that, where possible, it directly correlates to one another and presents the same assessment of infrastructure need;
 - c) at the discretion of HDC for it to choose if it so wishes to seek to rely upon the HGGT IFS to cover its District IFS need, if it considers this appropriate and in accordance with meeting its responsibilities. It is accepted that EFDC, EHDC, ECC and HCC shall each continue to prepare their own IFS.

Monitoring this MoU

- 5.4. Overall compliance with the MoU will be monitored via the regular process of commissioning and undertaking review of the HGGT IDP. If any issues arise, they will be referred to the next available Senior Officer Working Group or HGGT Board, or other appropriate forum, for discussion and resolution. This includes where judgements may be required in relation to ‘reasonableness’ or ‘appropriateness’ where referenced in actions contained

in this document, which are to be discussed in the spirit of the co-operative partnership.

- 5.5. The HGGT IFS shall be presented to the HGGT Board, or other appropriate forum, annually in alignment with the requirements for IFS publication for information.
- 5.6. The HGGT IDP shall be presented to the HGGT Board, or other appropriate forum, upon the completion of each review to seeks its endorsement and recommendation to the respective individual HGGT Authority partners for publication.
- 5.7. Through the process of producing the HGGT IDP, a package of measures and broad estimates of the likely financial contribution for each of the Garden Town sites has been produced. Where appropriate, this will be fed into an assessment of Viability Assessment. The purpose of the Strategic Viability Assessment undertaken in 2019 was to consider the wider deliverability of the Harlow and Gilston Garden Town, taking into account infrastructure requirements alongside other considerations. The HGGT Authority partners will agree collectively when it will be appropriate to undertake further viability assessment.

6. Signatures

This Memorandum of Understanding is signed and duly authorised for and on behalf of the following authorities.

For and on behalf of **Epping Forest District Council**

Signature:

Date:

Nigel Richardson, Director of Planning Services

For and on behalf of **East Hertfordshire District Council**

Signature:

Name (printed):

Date:

Sara Saunders, Head of Planning and Building Control

~~Signature:~~

~~Designation:~~

~~Date:~~

~~**Epping Forest District Council**~~

~~Name (printed):~~

~~Signature:~~

~~Designation:~~

~~Date:~~

For and on behalf of **Harlow District Council**

Signature:

Date:

Name (printed):

Andrew Bramidge, Director of Strategic Growth and Regeneration

Signature:

Designation:

Date:

For and on behalf of **Essex County Council**

Signature:

Date:

Name (printed):

Graham Thomas, Head of Planning & Sustainable Development

Signature:

Designation:

Date:

For and on behalf of **Hertfordshire County Council**

Signature:

Date:

Name (printed):

Colin Haigh, Director of Growth & Place

Signature:

Designation:

Date:

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Appendix A Draft Harlow and Gilston Garden Town Infrastructure Funding Statement

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List of consulted stakeholders

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