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Application	V/20/87717
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12 August 2020

Dear Sirs

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Application No: V/20/87717

Description: Scoping opinion under article 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for the development of up to 2,500 No. Residential Dwellings, the associated access, local employment, local retail, leisure and community facilities, primary school and supporting amenity space, landscaping, green infrastructure and sustainable drainage system (Known as One Horton Heath)

Site: Land West of Horton Heath

I refer to the above request for a scoping opinion under Regulation 15 (1) of Part 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the 2017 Regulations"). The scoping request was received by the Local Planning Authority (LPA) on 16 April 2020 and further correspondence engaged in subsequently.

The information provided in the submitted Scoping Report by Savills dated April 2020 details the following

Introduction
Site Description
Proposed Development
EIA Approach
Alternative Options and Consultation
Socio-Economics (including population)

Eastleigh Borough Council, Eastleigh House, Upper Market Street, Eastleigh, Hampshire SO50 9YN

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Air Quality (including human health)
Traffic and Transport
Built Heritage
Ecology
Hydrology (including flood risk and drainage)
Noise and Vibration
Ground Conditions
Landscape and Visual Impact
Archaeology
Soils and Agricultural Land
Climate Change
Health and Safety
Waste
Odour
Accidents and Natural Disasters (excluding flooding)

The information described in that document is generally considered appropriate and necessary and should be used in preparing any subsequent Environmental Statement (ES).

It is recognised that the Scoping Report provides a general commitment to provide the necessary information without being too specific, but the approaches detailed are generally considered acceptable but with further detail and clarification required as set out below.

You are advised to read and consider all detailed responses from consultees which can be viewed on our website via the following link: [VI/20/87717](#)

Alternative Options and Consultation

The approach set out in Paragraphs 5.1.2 and 5.2.1-5.2.3 Volume 1 Main Report is agreed.

Socio-economics

Given the scale of the development and potential impacts, both positive and negative, on the facilities, services and economy of the surrounding area, the LPA is in agreement with the applicant that Socio-economics should be scoped into the ES. The methodology for such assessment should be the subject of further discussion.

The ES should also include matters covered by Policies DM9 Public Utilities and Communications, DM10 Water and Waste Water, DM21 New Retail Development, DM23 Housing, DM26 Housing Mix, DM27 Older People's Housing, and DM31 Dwellings with Higher Access Standards of the Submitted Eastleigh Borough Local Plan (2016-2036) as these combine to impact socio-economic considerations.

For social impacts and benefits, improved foul sewage connections for the local area, including the scope to remove the need for septic tanks should also be a consideration and could provide a positive impact. Also, the provision for 5G broadband and potential for enhanced home-working.

In assessing retail impact, a Retail Impact Assessment and Sequential Test are necessary.

The application should include a Health Impact Assessment which addresses the physical, health and wellbeing impacts and opportunities resulting from the development and, in the absence of any formal advice from HCC Public Health, a Rapid HIA is agreed as being the appropriate for the EIA.

In 6.2.15 the baseline data collection is heavily biased towards social (health and education). Economic sources should be extended to include the extensive work being conducted by the University of Portsmouth, Hampshire County Council, Solent LEP and EBC's own Economic Development team to assess the impact on the local economy of the Covid-19 closures.

Under 6.2.16 more clarity is needed regarding exactly which aspects of the socio-economic judgements might be subjective. Where judgements are subjective, these should be balanced with the consideration of an opposing viewpoint.

6.2.17 should include a list of references.

Under 6.2.18 the direct effects on the local economy should be assessed, ie the use proposed for the 3.5 ha. of employment land

6.2.21 should include national and regional economic information as duplications just beyond the immediate geographical scope may prove useful when mitigating certain effects.

For 6.3.2 it is important to consider not only the snapshot of the local economy at the time of the study but and understanding of a) how it might evolve given recent events (ie as it goes into recession) and b) what changes we may see in the future as a result of both natural selection and EBC strategy.

Under 6.4.1 Please include:

- The definition of usage for the new employment space
- The skills that the workforce will need to have in order to feed the above
- The potential catchment area for these skilled workers and at least a reference to the impact on the local transport infrastructure of the increased workforce

Alternatively, if the information is not available at the time of application submission, an Employment Skills Plan could be offered and secured by condition or S106.

The considerations for Mitigation in 6.5 extend beyond the construction phase and should include the full range of infrastructure provisions.

Air Quality

Whilst Horton Heath itself is not an area identified at risk of exceeding air quality objective levels, the traffic generation from the proposed works are likely to have a significant effect on the local and wider environment and the Air Quality Management Areas within Eastleigh in particular. Therefore, the LPA is in agreement with the applicant that air quality should be scoped into any submitted ES. It is further agreed that assessment on the construction activities should be included.

NO_x and Particulate matter are non-threshold (i.e. any exposure is harmful) and, in the absence of a particular chapter on health, the increase in pollutants needs to be assessed to look at the impacts of increasing the health risks to people even if they remain below the legal limits.

Road receptors may be more distant than the nominal distances indicated in the report for assessments, due to traffic movement patterns brought about by the traffic growth resulting from such a large development itself, and also due to the improved road infrastructure with the creation of the link road and a through route from Bubb Lane to Allington Lane and onward to Eastleigh Town Centre. This last point is important when considering the scope of the air pollution and noise studies as there is a potential for resulting changes and increases in traffic to impact these in locations where air pollution and noise are already very elevated and exceed national guideline values. In particular, air pollution in the Eastleigh Air Quality Management Area and noise in the Noise Important Areas, (as defined under the European noise directive, END), which exist in Eastleigh town on the A335, Southampton Road, Leigh Road and Twyford Roads, but also on quieter roads where relative changes are large.

The scoping report is somewhat vague as to the specific nature of the development, but indicates maximum parameters at 3.1.3 which are to be used when assessing impacts. Whilst this approach will allow screening of impacts this will necessarily be imprecise due to the lack of detail and necessarily have relatively large uncertainty associated with the impacts so determined, this should be born in mind when assessing significance affects. Some uncertainty parameters should be attributed to predictions to assist understanding in the strength of evidence. It is recognised that as the schemes are progressed, more certainty in the scenarios to be considered can be included. Furthermore, recent parameter plan indications that buildings may be

four or five storey high introduces the need to scope in an assessment of the potential for canyon effects on air quality.

Similarly, there are uncertainties in the likely timescale over which the development will be constructed and become operational, this will affect the validity of some of the assumptions underpinning both air pollution and noise impact assessments, and the detail of how these have been considered in the various future scenarios which will be used to assess the scale of impacts should be included in the ES.

The benefits of new cycle network provisions should be accounted for in air quality work.

Traffic and Transport

The development is likely to result in significant changes to the nature of traffic and other transport movements within the Borough and beyond and the LPA is therefore in agreement with the applicant that Traffic and Transport should be scoped into any future ES.

The ES should include reference to Policy DM13 of the Submitted Eastleigh Borough Local Plan (2016-2036) and an assessment of the potential reduction of long-distance travel. The Council has received the Planning Inspectorate's response to the Plan which is likely to affect transport modelling for this site.

Hampshire County Council, as Highways Authority, requires a full Transport Assessment and Travel Plan to be included in the ES. Further discussions regarding the full content of these reports and proposed mitigation should be held with HCC and include LPA involvement. It is also advised that traffic data should be included for a wider range of local roads to include Sandy Lane/Winchester Road junction and include an understanding of how local roads are used during peak hours so as to avoid delays at junctions. The option for closure of the stretch of Burnetts Lane northwards until Fir Tree Lane should also be assessed.

With reference to 4.4.26, the conclusion that there are not likely to be impacts on health and safety on nearby residents where the narrowness, surface and visibility of the lane is concerned should be revisited in light of local experience relating to traffic in Burnetts Lane.

Highways England advise in respect of the Trunk Road network, and the impacts at Junctions 5 and 7 and 8 of the M27 should be included in the ES and Transport Assessment.

Impacts and controls associated with planned new roads for Botley By-Pass and the Bubb Lane to Burnetts Lane link (and associated road closure) should be assessed.

The ES must include comprehensive and detailed information in respect of sustainable transport options, including rail, bus, cycle and walking provisions. Where previous assumptions have been made regarding the feasibility of works, these should be revisited in the light of the current direction for the One Horton Heath project emanating from the Local Development Forum including the delivery of the Policy S13 cycle-route between Hedge End and Eastleigh via Horton Heath and the delivery of a cycle link to Deer Park Secondary School via Hedge End Station and links to Wildern and Wyvern Schools. The Local Planning Authority, as well as the Highway Authority, will wish to be engaged in this work.

The Transport Assessment should include railway trip generation figures for any increase/decrease in rail trips made at Hedge End and Eastleigh railway stations as a result of the proposed development. The information should specifically identify how many people from the development are expected to use the railway, particularly at peak travel times and an analysis of scope to increase rail service frequencies on this route. The information will the opportunity to assess and identify any mitigation measures that would need to be included as part of this proposal ensuring the safety of the operational railway.

Built Heritage

The Grade II listed Fir Tree Farm House is within the site and there are other listed buildings nearby. The Chalcroft Farm buildings are also of local built heritage interest. There will need to be supporting Heritage Statement information submitted with the application, and the LPA agrees with the applicant that this matter should be scoped into any future ES, particularly given the lack of certainty at this stage as to proposals in relation to built heritage interests.

The Environmental Statement should contain a thorough assessment of the likely effects which the proposed development might have upon the significance of these heritage assets, and should also consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk) the assessment, based on LPA advice, should include local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the

nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets. It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this. The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and which can also lead to subsidence of buildings and monuments.

Please ensure that the Built Heritage assessment is up-to-date at the time of submission and reflects any demolition which may have taken place between now and then.

The ES should also contain reference to Policy HH1 of the Submitted Eastleigh Borough Local Plan (2016-2036).

Ecology (Biodiversity)

There are no Statutory Designated Sites of nature conservation interests within the Site, although a number are located in the surrounding area including the River Itchen SSSI, Moorgreen Meadows SSSI, the Solent and Southampton Water Special Protection Area and Ramsar site and the Solent Maritime SAC **and the New Forest SPA**. The LPA considers that there is likely to be a significant effect on biodiversity as a result of the construction, *recreational* and operational aspects of the proposal. Baseline information will inform the type, scope and range of surveys to be carried out. The applicant has committed to undertake further surveys, and the Local Planning Authority would endorse the completion of these surveys,. This information will also need to be supplemented by Air Quality and Water Quality assessments (which should include surface water flows).

Regarding invasive species, Section 10.2.5 should include further details on the recording of their presence and an invasive species management plan, with advice taken from the Environment Agency.

Water vole should be included under Table 10.5 and assessed, as they and their places of shelter or protection are protected under the Wildlife and Countryside Act 1981 (as amended). Whilst the most recent survey did not find any active signs, this species has been noted previously along the western and central watercourses. Road and footbridge crossings (both permanent and any temporary crossing required to

facilitate development) could result in loss, fragmentation of and damage to the habitat of this species, especially if the crossings are situated where active burrows and areas of refuge are currently located. As the location of these crossing points has not yet been decided, this important ecological feature could be affected by the proposed development. In addition, this feature is sensitive to disturbance which may increase as a result of development on the site.

With reference to Quobleigh Ponds and woods SINC as included in Table 10.5, any changes to hydrological regimes on site should be included as potential significant effects to be assessed (plus any other standing water features on site).

With reference to Table 10.5 and effects on watercourses, rivers are a Priority Habitat under the Natural Environment and Rural Communities Act (2006). The ES should include assessment of the potential significant effects to these habitats on site, and this should include habitat fragmentation (as a result of crossings), construction and operational water quality/pollution and changes to hydrological regimes on the site. Changes of quantity and direction of overland surface water flow could impact on receiving waters and wetlands (also include in Chapter 11 Hydrology).

The table identifies the potential of Ndep to affect the habitats present. However, the Air Quality chapter appears to be addressing only dust impacts during the construction phase on ecological receptors within 50m of the site. It does not appear to be considering Ndep levels on ecological receptors which it will need to do in order to address this potential ecological impact

Section 10.5 sets out avoidance and mitigation measures. Watercourse crossings should be as few as possible, clear span and as narrow in width as possible to minimise effects on watercourses and any species dependent on them, including avoiding fragmentation of these important habitats. Depending upon bridge designs, mammal crossings may need to be provided. Shading and loss of watercourse corridors with the vehicular and pedestrian access crossings should also be included.

A thorough and detailed understanding of hydrological regimes on the site is essential when looking to avoid and mitigate for impacts on wetland habitats and watercourses, and when looking to achieve biodiversity net gain.

It is understood from the information in the Scoping Report regarding noise that piling may be required for the proposed development. Fish are particularly sensitive to vibration that may arise as a result of piling or other noisy percussive activities during construction within or close to watercourses. This and other habitats should be included as a potential significant effect to be assessed in the ES. Following

discussion at the 1HH Ecology Working Group further information on the impacts from sediments and on salmon spawning specifically is needed.

Recreation and disturbance (including noise) impacts could also be extensive and affect all retained and created habitats, including hedgerows which will also need to be assessed in terms of masterplanning and layout to make sure that the site design doesn't encourage use of ecologically sensitive sites for recreation.

Any additional mitigation following the above comments should be included in 10.5 Mitigation.

Section 10.5.4 should make reference to the required 50m buffers to ancient woodlands.

Climate change needs to be considered in this chapter.

The ES should also contain reference to Policy HH1 of the Submitted Eastleigh Borough Local Plan (2016-2036).

Hydrology

Given the sensitivity of the nearby water courses, including the River Itchen to the east, and that parts of the site lie close to or within flood zones 2 and 3, the LPA agrees with the applicant that Hydrology should form part of any submitted ES. As set out above, the hydrology section must feed into and link to the biodiversity section, and both should include the nearby the designated-site wetland habitats. Climate change also needs to be considered in this chapter.

Any assessment of flood risk should demonstrate how flood risk will be managed now and over the lifetime of the proposed development, ensuring that the latest climate change guidance is taken into account. Where possible, a sequential approach should be taken on the site ensuring that the development remains safe for its lifetime for both the development and elsewhere.

Section 11.2.12 of the Scoping Report highlights the assessment of the proposed development on flood risk, hydrology and water quality. Flood risk and incidents are evident downstream of the site, and therefore any assessment should consider the flood risk elsewhere in line with the National Planning Policy Framework and Planning Practice Guidance for Flood Risk and Coastal Change.

Flood risk should not be increased due to the proposed development, and where possible flood risk on and off site should be reduced as a result of the proposals.

Any assessment of flood risk should consider both short term construction risks (not limited to those identified in the Scoping Report), and the long term permanent flood risk.

The data used to inform the FRA should be the best and latest available data, taking into account the latest UK Climate Change Allowances and guidance.

The Environment Agency's full response should be considered in preparing the ES and they should be actively engaged in this work and their advice on the further information available adhered to.

Section 11.5 sets out that the mitigation measures are envisaged for flood risk. It should be noted that any measures should ensure that flood risk will not be increased, and where possible reduced, throughout the entire development, including during construction.

Whilst ordinary watercourse consents (administered by the Lead Local Flood Authority) and environmental permits (administered by the Environment Agency) help to minimise the impact, where possible any impacts should be considered at the planning stage so as to avoid refusals under the environmental permitting regime, we may object or require further information. The Environment Agency can advise as to any further information about flood risk mitigation measures in relation to this which should be included in the ES.

With reference to Section 11.2.10, to ensure effects on ecological features including wetland habitats and watercourses are not missed, any surface water drainage strategy should include information on water management across the site before, during, post-construction and for the longer term operation once development is completed and the site occupied/in use. The term 'water management strategy' should be used in the ES and subsequent application documents rather than 'surface water drainage strategy' to ensure all hydrological sources and receptors (especially hydro-ecology) are covered for the lifetime of the site.

Section 11.2.12 should include water dependent ecological features in the list of receptors. The list currently only covers watercourses, but no other wetland habitats such as marshy grassland and ponds. This point should be carried forward for consideration within the ES.

For Section 11.2.14: Please note that all receiving waters in Eastleigh Borough are to be considered as protected surface waters due to the proximity of designated sites for nature conservation (Section 26.7.1 Simple Index Approach, CIRIA C753 manual).
Section 11.4.9 and 11.4.10: Potential effects of a changed surface and ground water hydrological regime, such as changed quantities and flow direction, may result in

impacts on existing wetland areas which may receive less or more water as a result of the development if not mitigated.

Existing and appropriate (including ecological considerations) sub-catchments must be identified at baseline and these must be maintained (mimicked) during construction and in the final development.

Section 11.5.3 identifies that infiltration SuDS may not be feasible for all or part of this site due to the impermeable nature of the soil in some areas. It is essential that sufficient information on potential hydrological impacts and an understanding of the current natural hydrological regime is included early on in the design phase / master planning to ensure adequate space is provided for robust and effective SuDS systems, and to ensure that sensitive wetlands and receiving waters are protected. Mitigation can only be achieved to the standard required if the SuDS, delivered within connected blue-green infrastructure across the whole site, is designed at concept. This will enable the existing hydrological regime to be mimicked and water to be kept at the surface.

With reference to Section 11.5.4 and water quality, appropriate and effective ongoing monitoring (before, during, post construction and over the operation lifetime of the site) of hydrological impacts on sensitive receptors, and of the effectiveness of SuDS in reducing flood risk and protecting water quality of the sensitive receiving waters, must be incorporated in any water management (sustainable drainage) strategy and the ES should include further information in this respect.

Noise and Vibration

The LPA agrees with the applicant that noise and vibration should be scoped into any submitted ES. Noise monitoring must be submitted in accordance with a justified methodology to ensure sufficient certainty of all areas that will be materially impacted.

Considerations in respect of the scale and longevity of the project, the sensitive receptors and future scenarios are as per Air Quality comments above. Given the mixed uses proposed there will also be impacts from the new uses upon one another, requiring careful consideration of various pollution impacts to ensure these are designed out at the initial stages by use of layout and design, rather than reliance upon use, operational hours and activity restrictions and the use of barriers, screens and enhanced acoustic insulation to ensure acceptable internal and external noise levels particularly for residential uses. This should form part of the scope of the assessment.

It is important that adequate representation of existing background noise and vibration levels is demonstrated, which needs to take account of other noise sources

including transport networks and the Chalcroft Business Park. Periods of noise monitoring should be sufficient to establish typical noise levels with a reasonable degree of certainty.

Consideration needs to be given not only to the human impact of noise, but also the impacts on sensitive ecological receptors such as the River Itchen including, but not limited to, the impact on the migration of fish.

Vibration is scoped in for the construction phase **and** the operational phase due to through traffic and heavy traffic utilising the new link road and travelling through to Allington Lane / Eastleigh road and on to Eastleigh Town. Vibration impacts from Chalcroft Business Park HGVs is a known local issue.

Ground Conditions

Whilst the site does not lie within a Groundwater source protection zone (SPZ), given the site's location close to the River Itchen Special Area of Conservation the development will need controls in place and could, if not adequately addressed lead to significant effects on the water quality of the of the River Itchen. The LPA therefore consider that for this reason ground conditions should be scoped into any future ES. A detailed site investigation and risk assessment should be completed and used to inform a mitigation scheme to deal with the risk from land contamination. It is recommended that the applicant seeks advice from The Environment Agency on controlling the risk of contamination in relation to local water courses and ground water sources.

Landscape and Visual Impacts

The site lies within the NE designated National Character Area 128: South Hampshire Lowlands. It is considered that the level of the effect is likely to be significant locally but not within the wider landscape, but due to the extent of this effect this matter should be scoped into the ES.

Following a meeting between Tyler Grange, Savills and EBC's Principal Landscape Officer on 17.7.20 an agreed methodology as set out in the Scoping Report and Tyler Grange's further response dated 15.7.20 is confirmed as acceptable.

Archaeology – Scoped Out

There are no designated Archaeological Assets within the site or scheduled monuments within 1km of the site. However, no archaeological survey has taken

place and analysis of the archaeological remains recorded within the wider vicinity indicates the potential for the proposed development to affect as yet unrecorded archaeological features. The archaeological desk-based reports for the two previous applications for the site also conclude that there is potential for prehistoric, Roman and medieval remains. Further information will be necessary but the matter can be scoped out of the ES. Please also refer to the detailed comments of the County Archaeologist.

Waste – Scoped Out

The Environmental Impact Assessment (EIA) Scoping Report does not contain reference to potential mineral resource or either the adopted Hampshire Minerals and Waste Plan (HMWP) (2013) or the Hampshire Minerals and Waste Consultation Area (MCA). However, following discussion with the HCC Minerals and Waste Policy Officer on 24.7.20 it is agreed that Minerals and Waste can be scoped out of the ES, subject to the necessary supporting reports being submitted with the applications.

Cumulative Effects – scoped in

The scoping report does not refer to Cumulative Effects and this should be scoped into the ES to include proposed residential and commercial development within 5km of the site boundary with a suggested a development size threshold of 80 dwellings for residential dwellings and 1,000 square metres for retail. The 5km 'zone of influence' may be extended for the purposes of the transport assessment or certain other environmental aspects.

The list of schemes will also need to take account of the Council's Submitted Local Plan and development sites that are allocated within the plan in addition to schemes permitted and/or developed within the previous 5 years. Use of the guidance contained within 'Advice Note 17: Cumulative Effects Assessment is recommended to give weight to development under construction, permitted but not yet commenced development, and development allocated in existing and emerging plans.

Climate Change

The LPA is in agreement with the applicant that the proposal's impact on Climate Change should be scoped into the future ES, and should be assessed throughout the document rather and also addressed in a separate chapter. It should be noted that both national government and Eastleigh Borough Council have declared a climate change emergency.

The ES should directly address the contribution to climate change in terms of greenhouse gas emissions whilst also ensuring that the development is resilient to

any impacts on climate change but also the impact of transport on climate change etc. It is best practice for there to be a 'climate change coordinator for the ES to ensure that climate change is comprehensively considered throughout the ES.

Supporting information in the submitted Sustainability Report document should cover carbon dioxide emissions, zero or low carbon energy, managed use of water, flooding, mitigation and adaption to climate change, use of non-renewable resources, and mitigation for impacts of Nitrogen Dioxide and other pollutants on the Natura 2000 and Ramsar network and other natural habitats and sustainable transport with reference to Policies DM3 and DM4 of the Submitted Eastleigh Borough Local Plan (2016-2036) and the IEMA CHG in EIA Guidance Document V4.

Other Matters Scoped out

Accidents and Natural Disasters (excluding flooding)

The site is not at risk nor poses a risk to major accidents or disasters.

Health and Safety

The ES chapter on Socio-economics can address relevant health considerations. The Air quality, ground conditions, noise and vibration chapters should include human health.

Odour

Whilst not scoped in to the ES, we would expect to see odour qualitatively assessed as there is uncertainty to the actual industrial uses that would occupy the proposed B2 /B8 uses, and existing industrial uses which are and will adjoin the site.

Soils and Agricultural Land

The majority of the site is located on Grade 3b agricultural land and the development would not therefore impact on the provision of the best and most versatile agricultural land in the area. This matter can be scoped out of the ES.

The assessment should be undertaken by an appropriately qualified professional(s) to an appropriate level of detail, commensurate with the information available at the time of assessment. Information on some elements may be limited and such gaps should be acknowledged within the assessment.

It should be noted that additional information may be required in the ES if new development comes forward during the course of the determination of a future application or where new information becomes available for already consented development.

The above information forms the LPA's scoping opinion.

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The fact that the Scoping Opinion has been provided does not prevent the Local Planning Authority from requesting further information at a later stage under Regulation 25 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. It should also be noted that no indication of the likely success of any planning application submitted for this proposed development is implied in the expression of this opinion.

Yours faithfully

A handwritten signature in black ink, appearing to read "A Grandfield", written in a cursive style.

Andy Grandfield
Head of Housing and Development