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19 March 2019

Our Ref: 18-028  
BY EMAIL [[planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk)]

Dear Sir/Madam,

**REPRESENTATIONS TO THE BRENTWOOD LOCAL PLAN PRE-SUBMISSION DOCUMENT-  
REGULATION 19**

**BRENTWOOD COMMUNITY HOSPITAL**

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Iceni Projects Ltd ("Iceni") has been instructed by NHS Property Services Limited ("NHSPS") to prepare representations to the Brentwood Local Plan Pre-Submission Document (Regulation 19), relating to Brentwood Community Hospital, Crescent Drive, Brentwood, CM15 8DR (hereafter referred to as "the site").

Within these representations, our client wishes to outline the development potential of the land at Brentwood Community Hospital, and the benefits that the removal of the site from the Green Belt through the Local Plan process could bring.

For reference, a Site Location Plan is enclosed with these representations.

**a. NHS Property Services Site Ownership**

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In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively.

NHSPS's Property Strategy team has been supporting Clinical Commissioning Groups and Sustainability and Transformation Plan groups to look at ways of better using the local health and public estate. This will include identifying opportunities to reconfigure the estate to better meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites emerging from this process.

NHSPS is therefore promoting the site in accordance with Department of Health guidance (Health Building Note 00-08) which states "NHS PS owned sites that may become surplus to requirements should be protected by securing specific land-use policies for these sites in the relevant DPDs".

Should any part of the subject site be declared as surplus to the operational healthcare requirements of the NHS in the future (decision expected within 5 years), then the site should be considered suitable and available for alternative use, and considered deliverable within the period 5- 10 years.

## b. Site Context

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The site is located just under 650m east of Brentwood town centre. At present the land consists of one large U-shaped building, with a significant car parking area to the west, and a single storey outbuilding located within this car park. The existing main buildings vary between two and three storeys in height.

The site covers an area of approximately 2ha and, as previously stated, is partly located within the Green Belt. The northern and north-eastern parts of the site are located outside the Green Belt, and this includes part of the existing building making up the healthcare facility. The remainder of the site is currently located within the Green Belt.

Existing built form which is located within the Green Belt includes; the large car park, the access road, part of the existing healthcare facility building, and an existing single-storey outbuilding within the Car Park.

The site is bounded to the north and west by existing residential development within the settlement confines of Brentwood. Land to the immediate south is covered by dense woodland, and immediately to the south of that is further existing residential development. The land to the east of the site is occupied by a two to three storey commercial building set in grounds.

In terms of accessibility, there is a bus stop located within the site which offers services towards a number of settlements including Hutton, Shenfield, and Warley, whilst Shenfield Railway Station is located approximately 1.15km north-east of the site, and Brentwood Railway Station is located approximately 1.5km south-west of the site.

## c. National Planning Policy Framework (NPPF), 2018

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The Government's national planning policies are set out in the recently-revised NPPF published in July 2018. It contains the Government's policies for planning in England and should therefore be considered within these representations.

Paragraph 35 of the NPPF confirms that, to be sound, a plan must be:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

### Sustainable Development

Paragraph 8 identifies that achieving sustainable development means that the planning system has three overarching objectives, all of which should be considered to be interdependent and therefore need to be pursued in mutually-supportive ways:

- **'An economic role** – contributing to building a strong, responsive and competitive economy';

- **‘A social role** – supporting strong, vibrant and healthy communities’; and
- **‘An environmental role** – contributing to protecting and enhancing our natural, built and historic environment’.

Paragraph 11 states at the heart of the NPPF is presumption in favour of sustainable development. For plan-making this means that;

- a) Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.

### **Green Belt**

Section 13 of the NPPF (2018) outlines policy relating to the Green Belt. Paragraph 133 introduces the Green Belt, stating that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open. Paragraph 133 also states that the essential characteristics of the Green Belt is their openness and their permanence.

Paragraph 134 sets out the five purposes of the Green Belt, which are as follows;

- To check the unrestricted sprawl of large built up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 136 states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. Furthermore, strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure the Plan period.

Paragraph 138 states that when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account, with Paragraph 139 stating that when defining Green Belt boundaries, plans should ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development; be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the Plan period; and define the boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

Local Planning Authorities must also now keep an up-to-date Brownfield Land Register which keeps track of brownfield land in the district which is available for redevelopment for residential purposes, as well as the number of dwellings which could potentially be provided.

### **d. The emerging Plan**

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These representations seek to comment specifically on Housing Requirements, Housing Allocations, and relevant evidence base documents identified and referred to in the draft Local Plan. In addition to this, these representations will also comment on specific parts of the Spatial Strategy and Strategic Objectives provided in the emerging plan.

#### **Housing Requirements**

This Consultation document outlines that the Council commit to delivering 7,752 new net additional dwellings over the Plan period 2016-2033 using a stepped trajectory that would see 310 dwellings per

annum until 2022/2023, following by 584 dwellings per annum from 2023/24-2033. Overall, this represents an average of 456 dwellings per annum over the Plan period. The minimum housing need for Brentwood based on the standardised methodology is 452 dwellings per annum.

In addition to the Council's minimum requirement, there are 3,508 dwellings that are unmet in Basildon and 5,650 dwellings that are unmet in Havering. Basildon and Havering both adjoin Brentwood, therefore the Council should consider contributing to their housing needs through outlining and planning for a higher housing target. The Council should also consider the arrival of Crossrail, which is set to unlock further demand for housing in the area.

The Council's approach to a stepped trajectory is also not justified, and should look to deliver housing in the short term.

## **Housing Allocations**

The Council's Local Plan Consultation document identifies a number of residential allocations on Green Belt land located at the edge of the Brentwood Urban Area. Policy NE13 (Site Allocations in the Green Belt) states that sites allocated within the Green Belt will be expected to provide "significant community benefits", and will be de-allocated from the Green Belt to allow development to take place. This identifies that the release of Green Belt land in these areas is being pursued as part of their Spatial Strategy. Green Belt land is also proposed for release in a number of other settlements in the Borough.

Of the Council's allocations, there are four Strategic Housing Allocations. The largest allocation is Dunton Hills Garden Village Strategic Allocation (Policy R01), which is allocated for a residential-led development to deliver around 2,700 homes, with a potential overall capacity of 4,000 beyond 2033. This allocation was also located within the Green Belt. The variable housing target outlined by the Council is substantially reliant on this Garden Village commencing delivery in 2023/24 (within the first five years of the Plan), and delivering at a rate of 100 homes per annum from thereon, reaching 300 homes per annum from 2026.

### *Housing Allocation- Land off Crescent Drive*

The land adjoining Brentwood Community Hospital to the east benefits from a draft allocation in the Local Plan consultation document. Although this site has similar characteristics to the Brentwood Community Hospital site, including being a previous NHS site, it is not designated as Green Belt.

The allocation on site 186, Land at Crescent Drive, Shenfield, identifies that the 1.54ha site can provide for around 55 dwellings, anticipated to be delivered between 2021/2022 and 2023/2024. It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements. This outlines the development potential of the area.

## **Loss of Community Use**

Policy PC14 (Protecting and Enhancing Community Assets) states that existing community assets will be protected from inappropriate changes of use or redevelopment. Policy PC14 (e), states that development proposals that would result in a loss of community assets will be discouraged unless it can be demonstrated the following;

- i. There are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider community; or
- ii. the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services.

To confirm, a property can only be released for disposal or alternative use by NHSPS once Commissioners have confirmed that it is no longer required for the delivery of NHS services. Furthermore, NHSPS estate code requires that any property to be disposed of is first listed on "e-PIMS", the central database of Government Central Civil Estate properties and land, which allows other public sector bodies to consider their use for it.

The ability of the NHS to continually review the healthcare estate, optimise the use of land, and deliver health services from modern and fit for purpose facilities is crucial. Given that there is very careful oversight from NHS England and CCGs to ensure sufficient services are re-provided, and that the estate is fit-for-purpose, additional protection through planning policy should be unnecessary in relation to public healthcare facilities.

Therefore, if all or part of the site is declared as surplus to the operational healthcare requirements of the NHS by health commissioners, this should be considered sufficient to satisfy Policy PC14 and any subsequent replacement policy.

Furthermore, any marketing period (in addition to service re-provision) should not be required.

### **Evidence Base Documents**

Since the last consultation on the Brentwood Local Plan, the Council have published a suite of evidence base documents to inform the Regulation 19 Local Plan and to address the Council's main concerns. Evidence base documents of relevance consist of the following;

- Green Belt Study (November 2018); and
- Infrastructure Delivery Plan.

#### **Green Belt Study (2018)**

The Council's Green Belt study (February 2018), identifies that around 89% of the Borough is designated as Green Belt; it then splits all the Green Belt in the district into various parcels which are assessed against a number of criteria including the NPPF's five Green Belt purposes. The land at Brentwood Community Hospital is entirely located within Parcel 55: East of Middleton Hall Lane. This Parcel spans over 26.1ha of land which is identified as being wholly / largely contained by large built up areas.

In summary, the entire parcel is considered to be well-contained, but is located within a Critical Countryside Gap (CCG), operates as Functional Countryside (FC), and has a moderate relationship with a Historic Town. The Parcel is therefore identified as performing a moderate – high contribution towards the Green Belt's purposes.

The Green Belt Stage 2 Review (February 2018) sub-divided a number of sites assessed in Part 1 for further detailed assessment. Parcel 55 had not been sub-divided in Part 2 for further assessment and thus there was no further assessment of the site against the Green Belt's purposes in this round of assessment.

The Council's most recent Green Belt Study (November 2018), assesses the site under Site Assessment 186. To note, only the car parks to the western extent of the site fall within the Green Belt, therefore as such, the assessment only related to 25% of the site. The site was assessed as follows;

- The car parks are strongly associated with surrounding buildings, albeit protruding in to the Green Belt. The site is assessed as Partly Contained (PC);
- The site is small scale and contained within the town (e.g. infilling). The site is bounded by mature dense woodland to the west. Whilst development would mass housing on the site, there would be no appreciable reduction in the gap. The site is assessed as Separation Retained (SR);
- The area of the site located within the Green Belt is car parks and woodland areas so therefore is assessed as being Mixed Functions within Countryside (MFC);
- The site is assessed as having a limited relationship with the historic town (LRHT).

Overall, the site was assessed as having **low-moderate contribution** to the Green Belt. The site was considered as a “partly developed site” due to the hardstanding car parks and was associated with the settlement boundary to the east.

### **Infrastructure Delivery Plan**

The Council’s Infrastructure Delivery Plan (IDP) provides a schedule of infrastructure requirements to help support new development growth planned within the Brentwood Local Plan. Paragraph 10.6 outlines that Brentwood has a slightly higher proportion of over 65s compared to Essex county as a whole, although a 17% increase is expected between 2015 and 2025 equating to 2,600 more people. Given the foregoing, there is a clear need for a higher proportion of homes which are capable of accommodating people’s changing needs. Paragraph 10.19 of the IDP also states that hospitals will need to be redesigned to treat the patients of the future.

The site could be suitable for housing for older people as it is located in a sustainable location close to services, facilities and to transport links.

The IDP also highlights that there is an ongoing programme to improve the utilisation of Brentwood Community Hospital, to reduce the void costs associated with the building and to make better use of the opportunity for providing a range of health and care services.

### **Strategic Objectives**

This sub-section provides a review of the Spatial Strategy, and the Strategic Objectives and how they are of relevance to the subject site.

Chapter 2 (Borough of Villages), Figure 2.3 sets out the borough’s settlement hierarchy categories, to identify their role for delivering sustainable growth. Figure 2.3 outlines Brentwood as a “large town”, alongside Shenfield with 4 urban neighbourhoods, 2 large villages, 1 garden village, 6 rural villages, and 7 rural villages in sparse settings. Paragraph 2.11 of the Consultation document outlines that Brentwood is the borough’s largest settlement and offers the most scope to develop in, in accordance with sustainable development objectives as set out in the NPPF.

Chapter 3 of the consultation document outlines the Borough’s Spatial Strategy and Strategic Objectives. The Council have highlighted four strategic objectives and how the policies align to help deliver these policies. These are the following;

- SO1: Manage Growth Sustainably;
- SO2: Deliver a Healthy and Resilient Built Environment;
- SO3: Deliver Sustainable Communities with Diverse Economic & Social-cultural Opportunities for All; and
- SO4: Deliver Beautiful, Biodiverse, Clean and a Functional Natural Environment.

The subsequent chapters outline the policies that sit within each strategic objective. These representations specifically comment on both: Managing Sustainable Growth (SO1) and Sustainable Communities (SO3).

### **SO1: Managing Sustainable Growth**

The Council aim to direct development to the most sustainable locations, ensuring that the characteristics and patterns of the settlements are protected and enhanced.

The redevelopment of the site would aid the Council in delivering most of these objectives and policies. Although currently designated as Green Belt, the brownfield nature of the site and its location within the existing built up area of Brentwood means it can significantly aid in intensification. The site is also easily accessible by existing public transport modes as outlined in the ‘site context’ section of these representations. The site is highly sustainable and helps contribute towards delivering the Strategic

Objectives including having no unacceptable effect on visual amenity; having no unacceptable impact on health; and causes no unacceptable effects on adjoining sites.

The intensification of this site would also increase the critical mass of customers/users of existing services and facilities. This can help to ensure the viability of existing services and amenities in the local area.

The site could also be optimised for retention in its current use with the provision of additional built form to provide additional health services or an extension to the current facilities.

### **SO3: Sustainable Communities**

The Council aim to highlight opportunities which flexibly respond to the changing economic climate and employment sector trends making citizens feel economically empowered to enjoy and benefit from the necessary community/social infrastructure that sustains inclusive, informed, vibrant, active and cohesive communities.

The potential for the provision of residential development at the site would help the Council to meet their identified and growing need for housing over the plan period. The sustainable location of the site in relation to the existing built form and settlement of Brentwood means that should the site ever become surplus to the requirements of the NHS, it would be a great location for residential development. The site is adjoined to the settlement, so therefore can help contribute towards creating a cohesive community.

Furthermore, as outlined above, the site is also capable of accommodating further healthcare-related development, including the possible expansion of the hospital to provide better and more comprehensive services for the local community. The site is located in a sustainable location and is easily accessible by public transport, cycling and walking and could therefore make a good location for the expansion of the existing healthcare facilities should this be required by the CCG in the near future.

Chapter 3 also outlines the Council's spatial development principles, stating that development proposals in the borough will follow the following principles;

1. Urban Areas- Prioritise brownfield sites, making efficient use of land;
2. Brownfield Green Belt Land- Use of previously developed land in the Green Belt;
3. Strategic Sites- Use opportunities created by larger housing development;
4. Urban Extensions- deliver new homes in areas close to existing transport and local facilities;  
and
5. Windfall- an allowance for small scale development that will come forward in the future.

The site is Brownfield Green Belt land (Tier 2) so therefore should be favoured for development over strategic sites and urban extensions.

### **The Role and Extent of the Green Belt**

Policy NE9: Green Belt sets out that the Green Belt will continue to be preserved from inappropriate development so that "it continues to maintain its openness and serve its key functions". The redevelopment of this site would only seek for the removal of a small element of existing Green Belt land which is currently a mix of hardstanding car parking and woodland. This removal would enable efficient and maximum redevelopment of a brownfield site, without contradicting the purposes of the Green Belt.

The NPPF states that Green Belt boundaries should only be amended in "exceptional circumstances". The Housing White Paper seeks to clarify this further and states that land which has been previously developed should be considered first. Accordingly, it is sites such as Brentwood Community Hospital

which should be removed from the Green Belt. This is further outlined below, which highlights the sites suitability.

**e. Site Suitability**

The site is located adjoining the existing settlement and residential area of Shenfield, and a proportion of the site within the Green Belt is currently an existing hardstanding forming a car parking area. The site is located in close proximity to public transport connections which provides links to a variety of everyday services and amenities.

As previously identified, the site is currently partially located (25% of the site) within the Green Belt. However, due to the existing built form within and surrounding the site, and as evidenced in the Green Belt Study, the site provides little or no contribution towards the purposes of the Green Belt. The Council undertook a Green Belt Study (November, 2018) which assessed various parcels of Green Belt land within the district. The site fell within Site Assessment 186, which concluded as having **low-moderate contribution** to the Green Belt.

Although considered as having a low-moderate contribution to the Green Belt, a Green Belt assessment is provided below to outline the development potential of the land at Brentwood Community Hospital. The assessment is based on the Green Belt purposes identified in the NPPF. This assessment is to enable the Council to determine the importance of the site in Green Belt terms, and to demonstrate that the site does not meet the five purposes of the Green Belt, so therefore should be removed.

<b>Brentwood Community Hospital, Brentwood</b>
<i>1. to check the unrestricted sprawl of large built-up areas</i>
<ul style="list-style-type: none"> <li>- The site is bounded on three sides by the existing built form of Brentwood. The surrounding built form includes residential dwellings to the north and west, and a draft residential allocation to the east.</li> <li>- The built up area would not spread further than the site's boundary due to the presence of a significant area of woodland adjacent.</li> </ul>
<i>2. to prevent neighbouring towns merging into one another</i>
<ul style="list-style-type: none"> <li>- The site falls between the settlements of Shenfield and Brentwood. Although the site falls between these two settlements, the built form of Shenfield and Brentwood already links through the existing built form on Shenfield Road and it is not this site that forms any gap rather the playing fields adjacent.</li> <li>- The site's built form also limits its purposes in restricting the two settlements from merging as it is clear that it is an existing built up area.</li> </ul>
<i>3. to assist in safeguarding the countryside from encroachment</i>
<ul style="list-style-type: none"> <li>- The site is bounded to the north, east, and west by the existing built form of Brentwood.</li> <li>- The site is bounded to the south by existing woodland.</li> <li>- Due to the site not being located in the countryside, its contribution toward this aim is limited.</li> </ul>
<i>4. to preserve the setting and special character of historic towns</i>
<ul style="list-style-type: none"> <li>- The site is not located within a historic town.</li> </ul>
<i>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land</i>
<ul style="list-style-type: none"> <li>- The site is located within an existing settlement and promotes the intensification of an existing community facility which already has its own facilities, amenities, and day-to-day services, or, the site could equally be redeveloped for the provision of residential dwellings should the land become surplus to the NHS's requirements.</li> </ul>



## **f. Sustainability**

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The golden thread running through the NPPF is a presumption in favour of sustainable development. This means that developments which accord with the Local Plan should be approved without delay. The three pillars of sustainability within the NPPF are identified as Social, Environmental, and Economic; the definitions of these terms and the ways the proposals at Brentwood Community Hospital conform to these pillars are identified below.

### **Social**

The NPPF defines socially sustainable development as those which contribute toward supporting a strong, vibrant and healthy community by providing the supply of housing required to meet the needs of present and future generations, through a high quality built environment with accessible services and support of health, social and cultural wellbeing.

The redevelopment of Brentwood Community Hospital would accord with the social pillar of sustainable development through the provision of an increased number of residential dwellings on a sustainably located site in order to help meet the Council's identified and growing need for housing. Should the Council fail to meet their identified housing target, there could be serious social instability caused including overcrowding of existing housing stock and undersupply of housing. In addition to this, the site could represent the opportunity for the delivery of affordable housing towards the Council's identified need, representing a further opportunity to deliver a socially sustainable development.

### **Environmental**

The NPPF defines environmentally sustainable development as development which contributes to protecting and enhancing the natural, built and historic environment through improving biodiversity, using natural resources prudently, and minimising waste and pollution.

A scheme at Brentwood Community Hospital could provide sustainably located residential dwellings within walking distance of existing services and amenities, reducing the need for future residents to travel long distances and reducing pollution and the use of finite resources. Alternatively, should the CCG seek to expand their existing facilities on site, the intensification of the existing healthcare services could help to ensure the healthcare facilities continue to be provided in a sustainable location

### **Economic**

The NPPF defines economically sustainable development as development which contributes toward building a strong, responsive, and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation.

A residential scheme at Brentwood Community Hospital would accord with this pillar through the introduction of an increased number of residents into an existing urban area. These new residents will help to secure the economic viability and vitality of the existing local businesses and services through an increased customer base.

The redevelopment of the site would also ensure that a higher provision of land is available for a land use which is identified as being highly demanded at this point in time ensuring that a sufficient supply of land is available in a sustainably located site.

## **g. Summary and Conclusions**

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Should any part of the Brentwood Community Hospital site be declared as surplus to the operational healthcare requirements of the NHS in the future, then the site should be considered suitable and available for alternative use, and considered deliverable within the period 5- 10 years.

These representations identify the sites potential for future development, in accordance with the realignment of the Green Belt so that this significant area of developed land is no longer included. It is evident, that the site does not make a positive contribution towards the purposes of the Green Belt set out in the NPPF.

Accordingly, redevelopment of this site could provide a key contribution to Brentwood's housing need, which the Council have failed to justify, given the reliance on key strategic sites, and the lack of acknowledgement for unmet need arising from neighbouring authorities (Basildon and Havering). These representations therefore promote and identify parts of the Brentwood Community Hospital site as a suitable site to contribute towards these requirements.

This site presents an excellent opportunity for a high quality residential redevelopment on previously developed Green Belt land. This could be achieved without compromising the character of the area as the development can act as an infill site to the existing residential development surrounding it, and without the need for significant infrastructure.

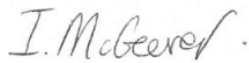
Furthermore, the site is also available to accommodate further health related development should the CCG seek to expand their services in this location, including the possible expansion of the hospital to provide more comprehensive services for the community. However, the site's Green Belt designation would make it difficult for any planning application proposing additional built form to provide further healthcare services to be considered acceptable.

The subject site is considered available, suitable and deliverable within the 5-10 year period of the plan.

I trust that these representations provide the Planning Authority with sufficient information to consider the site for removal from the Green Belt.

We would request to be kept informed of future stages of the Local Plan preparation. If you require any further information, please contact the undersigned (email: [imcgeever@iceniprojects.com](mailto:imcgeever@iceniprojects.com) Tel: 020 3657 5036) or my colleague Leona Hannify (email: [lhannify@iceniprojects.com](mailto:lhannify@iceniprojects.com) Tel: 020 3435 4213).

Yours sincerely,



Isobel McGeever  
PLANNER

Enc. Site Location Plan