

Brownfield Land Register – Consultation Responses December 2017

No.	Name	Company / Organisation Name	Comments Received	Council Response
1	Tim Porter	Catalyst	17200137 Wornington Green estate- Phase 2; We are currently on site building Phase 2 Phase 2a will complete 91 homes by June 19 Phase 2b will deliver a further 231 homes by 2024 Why is phase 3 not mentioned which will deliver a further 374 homes	We are reporting on net rather than gross figures. The minimum net increase is 281 units for Phases 2 and 3 (120 units + 161 units). This has been confirmed via email exchange with the respondent. The brownfield land register will be amended to reflect this capacity.
2	Andree Gregory	Highways England	<u>Proposed Brownfield Register</u> After looking through this document, Highways England offer no objection. The sites listed in this document already have permission, are listed in the Local Plan or would have no impact on the SRN.	No further comment.
3	Katharine Fletcher	Historic England	Consultation on the Royal Borough of Kensington and Chelsea Proposed Brownfield Land Register Part 1 Thank you for consulting Historic England on the proposed Part 1 Brownfield Register for the Royal Borough. Although there is no requirement to consult Historic England on Part 1 of the Brownfield Register we are pleased to provide the following comments. In responding to this consultation we have taken into account national policy and guidance contained in the National Planning Policy Framework (NPPF) and	The proposed brownfield land register that has been produced for consultation contains 61 sites in total. The amount of non-permissioned sites on the register is very low. The Council is currently working on a Local Plan Partial Review (LPPR) which has been

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			<p>supporting National Planning Policy Guidance (PPG). Historic England has also published advice relevant to site identification. In particular, we recommend that you refer to the following:</p> <ul style="list-style-type: none"> - Historic Environment Good Practice Advice in Planning (GPA 1) 'The Historic Environment in Local Plans'¹ and - Historic England Advice Note 3 'Site Allocations in Local Plans'². <p>1 The Historic Environment in Local Plans is available on Historic England's website at: https://content.historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/gpa1.pdf/</p> <p>2 Site Allocations in Local Plans is available on Historic England's website at: https://content.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans.pdf/</p> <p>We note that, with some exceptions, your brownfield sites schedule contains many sites that have previously been appraised through the adopted local plan, or have planning permission. Others have been subject to assessment through the emerging Local Plan Partial Review (LPPR), while a number of sites have no recent planning history.</p> <p>In the case of all sites the Council should be satisfied that there is compliance with national and local planning policy</p>	<p>submitted for examination earlier this year.</p> <p>As part of the extensive work undertaken for the LPPR, the Council has also produced an Integrated Impact Assessment (IIA) which includes a detailed SA/SEA of all the site allocations. Therefore, all of the site allocations have been subject to a detailed SA/SEA process with the latest IIA report published as recently as May 2017.</p> <p>The NPPG (Para: 022 Ref ID: 59-022-20170728) further advises that "Where a local planning authority considers that the Environmental Assessment of Plans and Programmes Regulations apply, the Strategic Environmental Assessment is likely to be limited in scope, and it may be appropriate to use assessments undertaken during the preparation of relevant development plan documents."</p>
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			<p>for the historic environment, both in terms of identifying the site, and in estimating the capacity and nature of development. This process will involve consideration of the setting of heritage assets as well as potential direct impacts on the assets.</p> <p>It is likely that such assessment has already been undertaken in many instances. We recommend that careful consideration is given to those sites without previous assessment, including any new sites that may be identified through this consultation process. The need for Strategic Environmental Assessment (SEA) arises for plans and programmes where there may be significant environmental effects. If Part 1 of the brownfield register constitutes a plan or programme then the issue is whether any of the sites (excluding those previously suitably assessed through SEA, or planning permission) would result in significant effects.</p> <p>We note the Council's reference to the relatively small number and capacity of sites for which no previous assessment or permission exists. In our view, it is not the number of sites, but their likely individual, or cumulative, effects that should be the consideration. Your assessment of these sites as part of your evidence base for the register will assist in determining if significant effects for the historic environment are likely.</p> <p>Historic England recognises that this is a new and developing area of work and we would be pleased to advise further. In particular, we would wish to engage if the Council propose to prepare a Part 2 to the brownfield register.</p>	<p>The only sites that remain in the brownfield land register that are neither permissioned nor site allocations have a capacity of 134 dwellings. These sites are Newcombe House - and 205 to 237 Kensington Church Street, South Kensington Station - Pelham Street, 1-31 Elkstone Road and Holiday Inn Forum Hotel - 97 Cromwell Road.</p> <p>The Council has considered the site capacity of these sites with reference to the refused planning permission in the case of Newcombe House and has carefully considered the built environment including heritage assets around the other remaining sites.</p> <p>The Council has strong conservation and design policies given that about 73% of the borough is within designated conservation areas.</p> <p>The Council also published an SA/SEA Screening Report and consulted Historic England on</p>
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				<p>this. The Screening Report concludes that an SA/SEA is not required. Comments have been received from Natural England and the Environment Agency who agree with the conclusion that SA/SEA is not required.</p>
4	Alice French	Indigo Planning (on behalf of Ballymore and Sainsbury's)	<p><u>Introduction</u> Sainsbury's Supermarkets Ltd (SSL) and Ballymore are joint majority landowners of the Kensal Canalside Opportunity Area (KCOA). The Opportunity Area is situated immediately south of the Kensal Green Cemetery Conservation Area (KGCA). The Opportunity Area (OA) is identified in the emerging Local Plan Policy CV5 as the last remaining large brownfield site in the Borough, allocated in Policy CA1 for comprehensive redevelopment, with capacity to deliver 3,500 homes, 10,000 sqm of office floorspace and 2,000 sqm of new non-residential floorspace. We support the use of brownfield registers and the Government's objective to speed up housing delivery. We are supportive of the inclusion of Kensal Canalside in the draft RBKC Brownfield Register. We strongly recommend, however, that the site description is amended to acknowledge the complexity of the OA's delivery and further work required in relation to infrastructure testing.</p> <p><u>Site Description</u> The site is described in the Brownfield Register as:</p>	<p>It is a requirement to review the brownfield land register annually. When more information becomes available, the register will be updated accordingly and reflected in the next review. HSC comments are noted.</p>

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			<p>'A minimum of 3,500 new residential units, 10,000 sqm m of new offices, 2,000 sqm m of new non-residential floorspace, including social and community and local shopping facilities in addition to the supermarket. A station on the Elizabeth Line. The relocation and re-provision of the existing Sainsbury's supermarket. On-site renewable energy and the provision of on-site waste management facilities.'</p> <p>We note the test in the 2017 Regulations. 4.1 [d] and criteria for site selection in brownfield registers require that 'residential development of the land is achievable'. In respect of the site, there is a Hazardous Substances Consent (HSC) covering a large area of the former Kensal Green Gasworks relating to the disused gas holders. While the HSC remains in situ the gas holders have a Health and Safety consultation zone around them within which residential development is restricted. Without the prior surrender or revocation of the HSC the residential development of the site will not be achievable. We note that the Royal Borough of Kensington and Chelsea is also the Hazardous Substances Authority with responsibility for review and enforcement of hazardous substances consents, which therefore would enable residential development to be achievable. We suggest that it would be appropriate for consideration to be given to the realistic timescales for surrender or revocation of the HSC when considering the timeframe at which residential development of the site is likely to be achievable, as this is a factor which is outside of the control of other landowners such as SSL and Ballymore.</p>	
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			<p>Though we note the requirement under schedule 2 1(n) of the 2017 Regulations, and understand the rationale for inclusion of 3,500 homes in line with the local plan allocation, we have concerns that as the detail of the site-specific SPD and details of the land take required for the Elizabeth Line station is not yet fixed, it is difficult to be certain as to whether 3,500 homes will be achievable on the site. We would anticipate that it may therefore be necessary in future to review and amend the description of development in the Brownfield Register to ensure that it remains in line with the more detailed work which will emerge as the site specific SPD is developed.</p> <p>The Brownfield Register should be regularly reviewed to ensure that it remains up to date.</p> <p>We look forward to acknowledgement of receipt of this letter in due course and we would be happy to discuss any aspect of the above.</p>	
5	Stephanie Walker	Lichfields	<p><u>17200047 Kensal Gasworks</u></p> <p>Q.4 St William agrees with the minimum net dwellings of 3,500 dwellings detailed on the Brownfield Register. This is in accordance with the site allocation (CA1) 'Kensal Canalside opportunity area' that states a requirement of 3,500 new residential dwellings.</p> <p>Q.5 The Council's brownfield register is a blank entry for 'deliverable'. We disagree with the Council's assessment of the site and confirm that it is 'deliverable' within 5 years beginning with the entry date. It is acknowledged that this is a complex site with multiple landowners, and the</p>	<p>It is a requirement to review the brownfield land register annually. When more information becomes available, the register will be updated accordingly and reflected in the next review.</p> <p>At this stage we do not have sufficient certainty about development timescales for Kensal Canalside to be able to</p>

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			comprehensive development for this strategic brownfield site will be phased over years. However, there is the ability to deliver an element of residential-led development on the site within 5 years from the entry date.	state that the site is deliverable within five years. For this reason, it has not been included in the first five years in the brownfield register. Not including it in the first five years does not mean that development cannot come forward earlier. The register will be reviewed annually and will provide updated information when available.
6	Victoria Kirkham	Natural England	<p>Natural England does not have any comments to make on specific sites proposed to be included on your Part 1 Brownfield Land Register.</p> <p>Annex A sets out generic advice from Natural England to assist in the preparation Brownfield Registers and help ensure that environmental protections in the National Planning Policy Framework are maintained and inappropriate development sites are not proposed for development.</p> <p>Where sites are considered suitable for inclusion on brownfield land registers, you should ensure that you have sufficient information upfront to fully assess all relevant environmental considerations and be satisfied that avoidance or mitigation measures for any adverse impacts can be delivered.</p>	Noted. The Council has considered each site is suitable for inclusion in the brownfield land register.
7	Michael Atkins	Port of London Authority	The Port of London Authority (PLA) has no comments to make regarding the proposed Brownfield Land Register. It is noted that the Lots Road Power Station / Chelsea	Noted. Cremorne Wharf continues to be safeguarded in line with the London Plan.

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			Waterfront development (plan ref PP/02/01324) is included as part of the Brownfield Land Register. Just to note that this site is adjacent to the safeguarded Cremorne Wharf which should continue to be safeguarded for waterborne freight handling use, in accordance with policy 7.26 of the 2016 London Plan.	
8	Adam Price	Transport for London	<p><u>17200082 South Kensington Station</u></p> <p>Q4. Yes. We fully support the inclusion of this site within the brownfield register.</p> <p>For clarity, the South Kensington Station site concerns the entire red line area as indicated in the attached plan DEV020.</p> <p>While development plans for this site are emerging, various feasibility/capacity options have been considered and, based on this, we believe that the site can provide a minimum of 20 net dwellings, rising to circa 50 dwellings in some options. As such, the dwellings range should be amended to accommodate this potential housing growth. We would welcome further discussion around this point and specific figures if Necessary before the final brownfield register is published.</p> <p>Q.7 Yes. The Mayor of London has a priority to deliver additional homes throughout London and, in particular, boost the level of affordable housing provision across the capital. As a public sector landholder, TfL has a crucial role to play in this delivery. However, this must also be</p>	<p>Regulations Criteria 4 “suitable for residential development”, states that;</p> <p>(d) is, in the opinion of the local planning authority, appropriate for residential development.</p> <p>In the Council’s view the suggested sites are not suitable due to the reasons set out below. TfL have not provided any supporting information with their response such as design/feasibility studies.</p>

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			<p>balanced with the need to raise capital receipt to reinvest in the public transport network.</p> <p>TfL is currently working in partnership with the Greater London Authority (GLA) to unlock a number of these public sector landholdings for residential development. We have identified a number of sites which have the potential to deliver these homes within the Royal Borough of Kensington and Chelsea. Site location plans of these sites are attached to this submission, which reflect the sites submitted using this form.</p> <p>The sites below, and listed above, are owned by Transport for London. TfL is committed to bringing these sites forward for development in the short/medium term (5 years). We will be engaging with the planning department in due course to demonstrate that the development of these sites are in accordance with the borough's local plan and are therefore deliverable. We look forward to this list being reviewed on an annual basis, as required in legislation</p> <p>STA157 West Brompton Station The site is 0.38ha in size, suitable of providing up to 93 dwellings. Not currently permissioned. The site is suitable for residential development as it is located within Earl's Court Opportunity Area, which has an objective of providing a minimum of 7,500 new homes. The site lies in an</p>	<p>The station is Grade II listed. Extract taken from listing described below; <i>“Underground station. Opened 12th April 1869.... Designed by Sir John Fowler, engineer to both companies, in Classical</i></p>
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			<p>emerging context of high-density residential development in a typically residential area and is highly accessible by public transport (PTAL 6a) It is considered that any impact on the immediate area could be successfully mitigated, with several developments located near to the adjoining railway lines and conservation area. The site is available for residential development as part of TfL’s review of its Landholdings. However, the operational use of part of the site would need to be retained. The site is considered to be achievable in relation to residential development within a 5-year period, as set out under The Town and Country Planning (Brownfield Land Register) Regulations 2017.</p>	<p><i>style.... Ticket hall refurbished One of a small number of 1860s underground stations which are the first in the world, West Brompton being unusual in retaining its original Booking Hall, although with some alterations. It is the best preserved example of a station on the District Line”.</i></p> <p>The adjacent cemetery is also listed. This is a thin slither of land which seems to include the railway track itself. It is between the railway line to the west, bridge over the railway to the north and Brompton Cemetery with many listed structures and monuments including Grade II* to the south and east. The numbers stated will have an unacceptable impact on Brompton Cemetery. In addition, it seems practically impossible to have access to the site. Also building over the railway track will bring financial and engineering challenges.</p>
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			<p>DEV109.02 and DEV109.03 Ladbroke Grove The site is split into 0.40ha and 0.20ha areas, suitable of providing up to 98 and 72 dwellings respectively. Not currently permissioned. The site is suitable for residential development lying in a largely residential context in a highly accessible location (PTAL 4). It is considered that any impact on the immediate area could be successfully mitigated, with several developments located near to the adjoining railway lines and other residential properties. The site is available for residential development as part of TfL’s review of its landholdings. The site is considered to be achievable in relation to residential development within a 5-year period as set out under The Town and Country Planning (Brownfield Land Register) Regulations 2017.</p>	<p>Ladbroke Grove Station - (109.03) Unsuitable as station is elevated. (109.02) Site overlaps with a designated open space by 0.38 ha or 94% (sites of borough importance Grade II) Nature Conservation.</p> <p>Regulations 2017 – Part 4 “suitable for residential development” in relation to any land means that the land at the entry date— (a)has been allocated in a local development plan document(s) for residential development; (b)has planning permission for residential development; (c)has a grant of permission in principle for residential development; or (d)is, in the opinion of the local planning authority, appropriate for residential development, having regard to— (i)any adverse impact on— (aa)the natural environment;</p>
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				<p>(bb)the local built environment, including in particular on heritage assets;</p> <p>(ii)any adverse impact on the local amenity which such development might cause for intended occupiers of the development or for occupiers of neighbouring properties; and</p> <p>(iii)any relevant representations received.</p>
9	Keira Murphy	Environment Agency	<p>Brownfield Land Register</p> <p>We note that currently you have only listed sites as Part 1 and not Part 2 which would grant permission in principle. When we are consulted on Part 1 of a Brownfield Register, we can provide advisory comments explaining any significant issues for these sites in terms of meeting the requirements of the National Planning Policy Framework.</p> <p>We have reviewed the sites and there are only 7 for which there are some environmental constraints, however these would not be of significant concern. For the remaining sites on the register we have no comments as there are no environmental constraints affecting these sites within our remit.</p> <p>Site 4 - Lots Road Power Station and Chelsea Creek - Lots Road</p>	<p>Noted that the 7 sites where there may be environmental constraints are not of significant concern.</p> <p>Lots Road Power Station – The site has planning permission and is being implemented on-</p>

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			<p>This site is located in Flood Zone 3 and is protected by the Thames Tidal flood defences up to a 1 in 1000 (0.1%) chance in any year. Our most recent flood modelling (June 2017) shows that it is at risk if there was to be a breach in the defences or they were to be overtopped.</p> <p>In accordance with the National Planning Policy Framework paragraph 101, development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. It is for the local planning authority to determine if the Sequential Test has to be applied and whether or not there are other sites available at lower flood risk as required by the Sequential Test in the National Planning Policy Framework.</p> <p>We note that this site has been allocated in the Local Plan and was included as part of the Local Plan Partial Review. This was supported by a Strategic Flood Risk Assessment dated March 2014 and a Flood Risk Sequential Test report dated 2017.</p> <p>As the site passes the Sequential Test a Flood Risk Assessment (FRA) should be undertaken which demonstrates that the development will not be at an unacceptable risk of flooding and will not increase flood risk elsewhere. This is to ensure the development will pass part b of the Exception Test. Any FRA would need to adhere to the guidance within the SFRA, Flood Risk Sequential Test Report and policy requirements for the site.</p>	<p>site. The Environment Agency (EA) are currently being consulted regarding the discharge of the planning conditions (Surface Water Management). Dialogue will continue with the EA.</p> <p>A Sequential Test for the Strategic Sites has been prepared and the EA's comments on the test were taken into consideration and changes made as a result. A FRA will be undertaken when necessary.</p>
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			<p>Site 18 - K1, 1-33 Brompton Road This site is located within a Source Protection Zone 2, which designates catchment areas of sources of high quality water supplies usable for human consumption. This area is therefore at particular risk from polluting activities on or below the land surface. As a result, any development on the site must have regard to the potential risks to drinking water. Due to this, it is important to consider the previous land uses of the site. Where contamination is known or suspected, a desk study, investigation, remediation and other works may be required to enable safe development. The minimum requirements for submission with a planning application is a preliminary risk assessment, such as a site walkover or conceptual model. Site Investigation and Remediation Strategy reports may be required for submission with planning application for sensitive land use types or where significant contamination or uncertainty is found.</p>	<p>K1 – The site already has planning permission. The site does not fall in a Critical Drainage Area but it covered a large area so an FRA was submitted. The planning permission includes conditions regarding the need to submit a Demolition Environmental Management Plan, a Construction Environmental Management Plan, and a Preliminary Risk Assessment report which should include a conceptual model indicating potential pollutant linkages between sources, pathways and receptors, including those in the surrounding area and those planned at the site (including water). A Site Investigation and quantitative risk assessment, a Remediation Method Statement and a Verification Report to address any contamination have also been conditioned.</p>
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			<p>Site 27 - Earls Court Exhibition Centre and Land Bounded by Warwick Road This site is located in Flood Zone 3 and is protected by the Thames Tidal flood defences up to a 1 in 1000 (0.1%) chance in any year, our most recent flood modelling (June 2017) shows that it is at risk if there was to be a breach in the defences or they were to be overtopped.</p> <p>In accordance with the National Planning Policy Framework paragraph 101, development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. It is for the local planning authority to determine if the Sequential Test has to be applied and whether or not there are other sites available at lower flood risk as required by the Sequential Test in the National Planning Policy Framework.</p> <p>We note that this site has been allocated in the Local Plan and was included as part of the Local Plan Partial Review. This was supported by a Strategic Flood Risk Assessment dated March 2014 and a Flood Risk Sequential Test report dated 2017.</p> <p>As the site passes the Sequential Test a Flood Risk Assessment (FRA) should be undertaken which demonstrates that the development will not be at an unacceptable risk of flooding and will not increase flood risk elsewhere This is to ensure the development will pass part b of the Exception Test. Any FRA would need to adhere to the guidance within the SFRA, Flood Risk</p>	<p>Earl's Court – This site has a granted planning permission. EIA was part of the planning application process with the correspondent consultation to statutory consultees. A Flood Risk Assessment was submitted at application stage. This site was included in the Sequential Test and the EA comments on the test were taken into consideration.</p>
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			<p>Sequential Test Report and policy requirements for the site.</p> <p>Site 34 - 158-166 Brompton Road 35 Cheval Place SW3 1HW This site is located within a Source Protection Zone 2, which designates catchment areas of sources of high quality water supplies usable for human consumption. This area is therefore at particular risk from polluting activities on or below the land surface. As a result, any development on the site must have regard to the potential risks to drinking water. Due to this, is important to consider the previous land uses of the site. Where contamination is known or suspected, a desk study, investigation, remediation and other works may be required to enable safe development. The minimum requirements for submission with a planning application is a preliminary risk assessment, such as a site walkover or conceptual model. Site Investigation and Remediation Strategy reports may be required for submission with planning application for sensitive land use types or where significant contamination or uncertainty is found.</p> <p>Site 48 - Wisley Court, 37 Beaufort Gardens SW3 1PW This site is located within a Source Protection Zone 1, which designates catchment areas of sources of high quality water supplies usable for human consumption. This area is therefore at particular risk from polluting activities on or below the land surface. As a result, any development on the site must have regard to the potential risks to drinking water. Due to this, it is important to</p>	<p>Noted. If necessary, this will be addressed at planning application stage.</p> <p>Noted. If necessary, this will be addressed at planning application stage.</p>
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			<p>consider the previous land uses of the site. Where contamination is known or suspected, a desk study, investigation, remediation and other works may be required to enable safe development. The minimum requirements for submission with a planning application is a preliminary risk assessment, such as a site walkover or conceptual model. Site Investigation and Remediation Strategy reports may be required for submission with planning application for sensitive land use types or where significant contamination or uncertainty is found.</p> <p>Site 53 - 41 To 43 Beaufort Gardens SW3 1PW This site is located within a Source Protection Zone 1, which designates catchment areas of sources of high quality water supplies usable for human consumption. This area is therefore at particular risk from polluting activities on or below the land surface. As a result, any development on the site must have regard to the potential risks to drinking water. Due to this, it is important to consider the previous land uses of the site. Where contamination is known or suspected, a desk study, investigation, remediation and other works may be required to enable safe development. The minimum requirements for submission with a planning application is a preliminary risk assessment, such as a site walkover or conceptual model. Site Investigation and Remediation Strategy reports may be required for submission with planning application for sensitive land use types or where significant contamination or uncertainty is found.</p>	<p>Noted. If necessary, this will be addressed at planning application stage.</p>
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			<p>Site 74- 60-62 Walton Street SW3 2HH This site is located within a Source Protection Zone 2, which designates catchment areas of sources of high quality water supplies usable for human consumption. This area is therefore at particular risk from polluting activities on or below the land surface. As a result, any development on the site must have regard to the potential risks to drinking water. Due to this, it is important to consider the previous land uses of the site. Where contamination is known or suspected, a desk study, investigation, remediation and other works may be required to enable safe development. The minimum requirements for submission with a planning application is a preliminary risk assessment, such as a site walkover or conceptual model. Site Investigation and Remediation Strategy reports may be required for submission with planning application for sensitive land use types or where significant contamination or uncertainty is found.</p> <p>SEA Screening Statement for Brownfield Land Register Having reviewed the proposed sites to be listed as Part 1 of the register, although there are some environmental issues on 7 of the sites, these are unlikely to have significant environmental impacts. Therefore, we agree that SEA will not be necessary for the proposed brownfield land register.</p>	<p>Noted. If necessary, this will be addressed at planning application stage.</p>
10	Piotr Behnke	Natural England	<p>Having taken a look at this consultation Natural England would have no issue with the determination that there is</p>	<p>No further comment.</p>

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			<p>no further assessment required under the SEA Regulations for the above two SPDs and as such would have no further comment to make with relation to this particular consultation at this time.</p> <p>Please accept this email as our reply to this consultation however should you require this as a formal letter then do let me know.</p>	
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