INTRODUCTION

Jonathan Darby

Welcome to this week's edition of our Planning, Environment and Property newsletter. As well as an update as to the progress of the Planning Inspectorate towards taking appeals and local plan examinations virtual, this edition includes the fourth instalment in a series of articles addressing key aspects of the Environment Bill; an article on the A63 Development Consent Order; as well as an article on avoiding procedural risks in local plan-making.

We hope that you enjoy the read!

Contents

PLANNING INSPECTORATE UPDATE

Jonathan Darby

Having postponed all planning appeal hearings and inquiries at the start of lockdown, the Inspectorate has decided around 2,500 cases. In order for the planning system to function effectively and to deliver economic benefits for a post-Covid recovery, it has grown ever more apparent that more must be done to facilitate hearing, inquiries and examinations, including by conducting them remotely/virtually.

On 13 May, a written ministerial statement set out plans for the majority of appeal hearings and inquiries and local plan examinations to be conducted virtually.

In an update published last week, the Inspectorate confirmed that it has been accelerating work to implement virtual hearings and inquiries across all of casework types. In applying new technology to its work, the Inspectorate has drawn a distinction ("two strands") between: first, cases where site visits may not be necessary and second, moving face to face events into a virtual environment.

Site visits

In the Inspectorate's previous update, it had highlighted some instances in which cases can be progressed without a site visit . To date 20 decisions have been issued following this process, although it is at the Inspector's discretion as to whether to adopt such a procedure provided that he has sufficient information to properly determine the appeal.

The Inspectorate also confirmed that – since 13 May when the restrictions were eased – it has restarted site visits where: i) the Inspector can visit the site safely under current physical distancing guidance; and ii) the case requires the Inspector to visit the site in person in order to progress the case. As a result, over 600 site visits have been programmed for May.

Virtual events

Further to a successful first virtual hearing on 11 May, and decision issued 27 May, there are plans to hold at least another 20 hearings and inquiries and an additional 15 hearings for National Infrastructure projects in June.

The Inspectorate also indicated that:

1) It has prioritised cases that were postponed due to the pandemic.
2) Its "working definition of virtual" includes the use of video technology and phone where necessary.
3) While social distancing measures remain in place, we will seek to run hearings and inquiries virtually in the first instance, although its aim is to make virtual events the standard option for the majority of events in future. Nevertheless, this is "not the end of face-to-face hearings and inquiries. Face-to-face events will continue to be part of [the Inspectorate's] future once the current situation has passed."
4) Although it can take several weeks to arrange and we must liaise with parties and others to agree dates and ensure everyone is able to participate, it is confident that professional standards and the Franks Principles can be maintained while running virtual hearings and inquiries.
5) The inspector will run the event in the normal way, but with participants invited to join via Microsoft Teams or by phone.
6) Participants will receive details of any requirements, guidance and support, taking into account any representations received.

All of the above presents a slightly more positive (and pro-active) picture in terms of the Inspectorate's attempts to adapt to meet the challenges presented by the 'new normal'. One hopes that the Inspectorate will not only have been encouraged by the manner in which the courts and tribunals services has embraced the need to adopt

1 The examples given included prior approval cases where the issue in dispute relates to the interpretation of the General Permitted Development Order or some enforcement appeals depending on the specific grounds lodged and the nature of the evidence.

new, virtual, methods of working but also that its own efforts can be rapidly scaled up in order to mitigate the damaging effects of the inevitable backlog.

As ever, the Inspectorate's latest detailed guidance should be consulted for the most up to date information.[2]

THE ENVIRONMENT BILL: BIODIVERSITY GAINS AND CONSERVATION COVENANTS

Stephen Tromans QC and Ruth Keating

Overview

This is the fourth instalment in a series of articles addressing key aspects of the Environment Bill ("the Bill").[3] This article deals with the provisions of the Bill on biodiversity gains and conservation covenants. These are covered in Part 6 'Nature and Biodiversity' and Part 7 'Conservation Covenants' of the Bill, as currently drafted.[4]

The impact of these provisions will be far reaching and will have particular importance for developers and large rural landowners. Key features are outlined below.

Objectives behind the Bill

Before considering the draft provisions of the Bill, it is helpful to consider the objectives the government is aiming to achieve.

The government acknowledges that much of our wildlife-rich habitat has been lost over the last century and many species are in long-term decline.[5] A key objective of the Bill is that it will contribute to the recovery of our natural environment, improving biodiversity and protecting urban street trees, in line with the ambitions set out in the 25 Year Environment Plan published in 2018 and which will be the first environmental improvement plan provided for in Part 1 Chapter 1 of the Bill.

The government's objective is that by making biodiversity gain a condition of planning permission, they will ensure it is a priority for developers and planning authorities. Conservation covenants can then be used to secure the benefits delivered by other measures for the long term.[6]

Draft provisions of the Bill

The Bill is intended to provide a framework of measures to support nature's recovery.[7] The Bill contains provision for the following:

- A 10% biodiversity net gain requirement on new development.
- A strengthened biodiversity duty on public authorities.
- Conservation covenants.

Biodiversity net gain and the strengthened biodiversity duty on public authorities

The Bill will make it mandatory for housing and development to achieve at least a 10% net gain in value for biodiversity.

Developers must submit a 'biodiversity gain plan' alongside usual planning application documents and the local authority will assess whether the requirement is met. This plan must include,

2 https://www.gov.uk/guidance/coronavirus-covid-19-planning-inspectorate-guidance

3 In the preceding three editions of the PEP bulletin: Richard Wald QC and Ruth Keating considered the new Office for Environmental Protection ("OEP") and the Bill's environment target provisions; and Stephen Tromans QC and Gethin Thomas considered the provisions of the Bill concerning water.

4 The Bill: https://publications.parliament.uk/pa/bills/cbill/58-01/0009/Enviro%20Compare.pdf last accessed 1 June 2020.

5 Department for Environment Food & Rural Affairs, 'Policy paper 10 March 2020: Nature and conservation covenants (parts 6 and 7)' (13 March 2020) https://www.gov.uk/government/publications/environment-bill-2020/10-march-2020-nature-and-conservation-covenants-parts-6-and-7 last accessed 1 June 2020 ('Policy Paper March 2020').

6 Policy Paper March 2020.

7 Department for Environment, Food & Rural Affairs, '25 Year Environment Plan': https://www.gov.uk/government/publications/25-year-environment-plan last accessed 1 June 2020.

amongst other matters, details of how: (i) the biodiversity value has been calculated, and (ii) the way in which the net gain target will be achieved.

Calculating biometric net gain

The biodiversity value must be calculated using the Government's biodiversity metric calculator.[8] In broad terms, the biodiversity net gain is calculated by deducting the pre-development biodiversity value (calculated at the time of the submission of the planning application) from the estimated post-development biodiversity value (at the time the development is completed).[9]

Of course, a habitat's full biodiversity value may increase years after the development is 'completed'. This future value can be used where certain conditions are satisfied. These are where (i) it is secured under a planning condition, planning obligation or conservation covenant; (ii) the planning authority considers that the increase is significant in relation to the pre-development biodiversity value; and (iii) it will be maintained for at least 30 years after the development is completed.

The post-development biodiversity value can also include off-site options. These can include enhancing a habitat registered on the government's proposed "biodiversity gain register" or purchasing "biodiversity credits" from the Government.[10]

Duties on local authorities

The Bill also strengthens the biodiversity duty on public authorities. The Natural Environment and Rural Communities Act 2006 currently includes a duty on public authorities to have regard to the conservation of biodiversity. The Bill amends this duty so that there is an expectation on public authorities to look and act strategically – with clause 95 providing for a general duty to conserve and enhance biodiversity and clause 96 providing for biodiversity reports, in which public authorities must publish, amongst other areas, a summary of the action which the authority has taken to comply with its duties in respect of biodiversity.

Conservation covenants

Another central part of the Bill is the conservation covenant. In this regard, the Bill adopts a recommendation by the Law Commission made in June 2014.[11] Conservation covenants will be voluntary but legally binding written agreements between a landowner and a designated "responsible body" to conserve the natural or heritage features of the land.

Under clause 104 of the Bill:

- A "conservation covenant agreement" will require the landowner or responsible body to do, or not to do, something on land specified in the provision.
- The landowner must hold a qualifying estate in respect of the land. A "qualifying estate" means that the landowner will hold a freehold interest in the land or a leasehold interest where the lease was granted for more than seven years.
- The agreement must have a conservation purpose, and be intended, by the parties, to be for the public good. A conservation purpose covers a broad church and includes the natural environment of land or the natural resources of land, and places of archaeological, architectural, artistic, cultural or historic interest.

8 Natural England, 'The Biodiversity Metric 2.0 (JP029)' http://publications.naturalengland.org.uk/publication/5850908674228224 last accessed 1 June 2020.

9 Further details on how the biodiversity net gain will be calculated can be found in Schedule 7A, Biodiversity Gain in England, Part 1, 'Overview and Interpretation'.

10 In respect of the latter, clause 92 of the Bill in its current form explicitly says that *"[i]n determining the amount payable under the arrangements for a credit of a given value the Secretary of State must have regard to the need to determine an amount which does not discourage the registration of land in the biodiversity gain sites register"*.

11 Law Commission, 'Conservation covenants – Final Report' (Law Com No 349) (24 June 2014) https://www.lawcom.gov.uk/project/conservation-covenants/ last accessed 1 June 2020.

There are several further points to note:

- Binding obligations: As per clause 110 an obligation under a conservation covenant is owed (a) to the landowner under the covenant, and (b) to any person who becomes a successor of the landowner under the covenant.
- Enforcement: Clause 113 of the Bill provides that in proceedings for the enforcement of an obligation under a conservation covenant, the available remedies are specific performance, an injunction, damages, and an order for payment of an amount due under the obligation.
- Defences: As per clause 114, in proceedings for breach of an obligation it is a defence to show that the breach occurred (a) as a result of a matter beyond the defendant's control; (b) in emergency circumstances; or (c) where the land was within an area, designated for a public purpose, and compliance with the obligation would have involved a breach of a statutory control.
- Discharge or modification of obligation by agreement: Clauses 115-117 outline that the parties may agree in writing to discharge the obligation or modify it.
- The Upper Tribunal and courts: Clause 118 (Schedule 16) provides for discharge or modification of an obligation on application to the Upper Tribunal. Under clause 124 the court or Upper Tribunal may, on the application of any person interested, determine the nature of conservation covenants i.e. (a) declare whether anything purporting to be a conservation covenant is a conservation covenant; (b) whether any land is land to which an obligation under a conservation covenant relates; (c) whether any person is bound by, or entitled to the benefit of, an obligation under a conservation covenant; and (d) the true construction of any instrument under which a conservation covenant is created or modified.

Concluding remarks

In some respects, the basis of the provisions lies in good practice which is already being followed by some planning authorities and developers, and which has in some cases been used to unlock development on sites which have features of national or local conservation interest. However, plainly there are many authorities and developers which have not been according sufficient priority to nature conservation, regarding it as best as an inconvenience. These provisions will put the issue squarely onto the agenda for all planning applications, of course at a time when there may be great pressure for development to aid economic recovery and to generate much-needed housing. They may be seen as presenting both threats and opportunities – perhaps much as CIL did when it was introduced. What is clear is that there will be a very steep learning curve involved. Rural landowners, particularly large ones, have the potential to do very well financially, including not only farmers, but major owners such as the Crown Estate, statutory undertakers, MoD and the Church Commissioners.

Of course, the detail of the provisions may be different when the Bill eventually becomes law. However, the objective of the Bill is that it will introduce "a range of ambitious measures to address biodiversity loss" to reverse biodiversity decline.[12]

Much of the success of these measures will be reliant on landowners, developers and public authorities understanding and utilising these provisions to good effect. In this regard, the government is expected to consult on and provide guidance. Such guidance should clarify the ways in which the use of on-site habitat creation may be preferred to off-site options (the mitigation hierarchy)[13] and how provisions will work during the 'transition period'.

12 Policy Paper March 2020.

13 Department for Environment Food & Rural Affairs, 'Net gain, Summary of responses and government response' (July 2019), at 9. Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/819823/net-gain-consult-sum-resp.pdf last accessed 1 June 2020.

With this in mind current development proposals, perhaps only still at masterplan or earlier stages, should consider the way in which these provisions might impact their development or land. In terms of the future, developers will also need to take care to ensure their biodiversity net gain is correct, clearly presented and well-evidenced, while also considering the ways in which conservation covenants may be used to assist them.

With guidance, it is hoped that these provisions will assist in ensuring wildlife-rich and strong future habitats. However, effective and clear guidance will be crucial to that success, as will a robust and credible system of metrics to underpin it.

A63 DEVELOPMENT CONSENT ORDER: NOTE FOR EPIC (NO.2) LIMITED

Richard Harwood OBE QC

On 28th May 2020 the Secretary of State for Transport made the development consent order for the lowering and widening of the A63 dual carriageway in Hull, rejecting the Examining Authority's recommendation to refuse the scheme. The case illustrates approaches to heritage harm, human remains and protection for businesses directly affected by a road scheme.

The Inspector conducting the examination found that the scheme would improve access to the Port of Hull, relieve congestion and improve safety, but its effect on connections between the city centre to the north and developments and tourist and recreational facilities to the south would be mixed. The loss of at-grade access to non-motorised users was harmful, particularly for persons with restricted mobility.

Heritage impacts

The Inspector considered that more could have been done to minimise impacts on the Earl de Grey public house which was in the way of the proposed route. The proposal was that the pub would be relocated three metres to the north. In the Inspector's view, this substantial harm to the listed pub was decisive against the scheme. There was also harm to the setting of other listed buildings, the Old Town Conservation Area, and permanent visual harm to the Trinity Burial Ground, a non-designated heritage asset.

Further details were provided to the Minister, including for the relocation of the listed pub, but whilst the harm was still substantial, the Minister considered that consent should be granted. He considered that no other alternatives had been put forward for the pub and that the pub cannot remain in place if the road is to be built (decision para 82). He concluded:

> "substantial harm to the pub is necessary in order to deliver the substantial public benefits of the scheme, which in his view outweigh the harm."

Human remains

The proposals for human remains were substantial, but ones which the examining authority considered were satisfactory. Some 16,000-19,000 burials might be contained in the affected area, about 70% of which would be suitable for analysis, although only 390 surviving memorials. Highways England proposed to analyse 10% of the excavated remains. This was much less than Historic England sought (they had proposed 3,000-5,000 being tested), and guidance pointed towards a larger sample size. The Examining Authority accepted the Highways England proposals, given the time and cost involved and the more limited value of the exercise as few remains would be identifiable by name or background.

Protection for retail operators

One of the objecting landowners was EPIC (No2) Limited who own the Kingston Retail Park to the immediate south of the A63, part of which would be taken and access disrupted by the scheme. Part of the site would be taken permanently for the works, some was to be possessed temporarily for those works. Additionally a large part of the remainder of the car park was to be subject to temporary possession so that Highways England

could reconfigure it for EPIC's benefit.

The Examining Authority considered that the temporary possession of large parts of EPIC's car park for the purpose of reconfiguring it was not justified.

He addressed EPIC's other concerns with proposed amendments to the DCO if the settlement agreement was not reached. Various requirements (equivalent to planning conditions) were proposed for measures of wider effect including traffic modelling and a scheme of improvements for a junction, with any necessary improvements; signage for an alternative route; the maintenance of a direct pedestrian route during the works (unless otherwise approved by the Minister); and not stopping up a road until alternative access had been provided for articulated HGVs with a traffic regulation order to restrict parking on a street and so allow their movement.

Protective provisions for the protection of EPIC were also proposed. These would have required access to be maintained to both service yards at Kingston Retail Park for vehicles up to 16.5m articulated HGVs at all times during the construction of the authorised development. Temporary possession would be minimised. Temporary and permanent rearrangements of the car park would be agreed with EPIC and carried out in accordance with an agreed timetable. Permanent level pedestrian access to the retail park from the Mytongate Junction would be reinstated. The site's totem poles would be relocated during and at the conclusion of the works, being reinstated within 14 days of removal. The design of hoardings on the land taken from EPIC would be agreed.

The examining authority considered that other matters: advance notification of works, parking and movement of constructor vehicles, restrictions on noise, dust, vibration and working hours, CEMP monitoring, noise monitoring were addressed by other requirements.

Following the submission of the Examining Authority's report Highways England and EPIC made a settlement agreement. The Secretary of State considered that consequently there was no need to make any changes to the order.

Richard Harwood QC appeared at the examination for EPIC (No2) Limited, instructed by Paul Thompson of Temple Bright.

AVOIDING PROCEDURAL RISKS IN LOCAL PLAN-MAKING: PHYSICAL INSPECTION REQUIREMENTS AND LOCKDOWN

Tom van der Klugt

The legislative framework for making Local Plans, in common with many other planning regimes, contains a number of provisions which require local planning authorities (**"LPAs"**) to make documents physically available for inspection. Yet this is difficult – if not impossible – for LPAs to achieve whilst COVID-19 'lockdown' restrictions remain in place. This article looks briefly at the challenges this poses for LPAs, as well as possible future developments.

Physical inspection requirements

Part 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (**"the 2012 Regulations"**) sets out the legal framework for making Local Plans.

Regulation 18 sets out a requirement to consult during the preparation of a Local Plan. This initial part of the process does not require LPAs to make documents physically available for inspection, and so lockdown should not prevent the progression of the early stages of a Local Plan, subject to specific commitments made by LPAs in their Statements of Community Involvement (**"SCIs"**), where LPAs may need to consider amendments.

However, a number of the subsequent stages of making a Local Plan expressly require documents to be made physically available for inspection. This

applies to Regulation 19 (publication of a local plan), regulation 22 (submission of documents and information to the Secretary of State), regulation 24 (independent examination), regulation 25 (publication of the recommendation of the appointed person) and regulation 26 (adoption of a local plan). It also applies to regulations 12, 13 and 14 in relation to supplementary planning documents.

What constitutes 'making a document available' is set out at regulation 35. Regulation 35(1) provides that *"A document is to be taken to be made available by a local planning authority when (a) made available for inspection, at their principal office and at such other places within their area as the local planning authority consider appropriate, during normal office hours, and (b) published on the local planning authority's website…"*

Thus, in order for a document to be made available for the purposes of the 2012 Regulations, both limbs of regulation 35(1) must be satisfied. Website publication on its own will not achieve compliance. This leaves LPAs unable to progress Local Plans in compliance with regulation 35 during lockdown, apart from in their very initial stages, while non-compliance with these requirements would leave a Local Plan highly vulnerable to a future legal challenge.

Recent guidance

Despite the difficulties posed by such physical inspection requirements during lockdown, MHCLG issued guidance on 13 May 2020 ("Coronavirus (COVID 19): planning update"), urging LPAs to continue to progress Local Plans:[14]

> *"We continue to want to see Local Plans progressing through the system as a vital means for supporting economic recovery in line with the government's aspirations to have plans in place across the country by 2023. We recognise the challenges that some local authorities may face, and are working on ways to address this, from actively exploring options to achieve online inspection of documents being the default position to engaging with the Planning Inspectorate on the use of virtual hearings and written submissions. We have also issued additional planning guidance on reviewing and updating Statements of Community Involvement."*

On the same day, MHCLG updated its guidance on plan-making to highlight the potential need for LPAs to update SCIs to allow Local Plan-making to continue during the pandemic:[15]

> *"Local planning authorities will need to assess their Statements of Community Involvement to identify which policies are inconsistent with current guidance on staying at home and away from others or any superseding guidance. This could include, for example, holding face-to-face community consultation events or providing physical documents for inspection… Where any of the policies in the Statement of Community Involvement cannot be complied with due to current guidance to help combat the spread of coronavirus (COVID-19), the local planning authority is encouraged to undertake an immediate review and update the policies where necessary so that plan-making can continue."*

Possible amendments?

The MHCLG guidance published on 13 May 2020 cannot, of course, 'trump' the underlying legislation in the 2012 Regulations (although it may be open to LPAs to amend physical inspection requirements featuring in SCIs only), and to that extent, LPAs will be unable to follow it as the situation currently stands.

However, the guidance does appear to indicate that the issue is on MHCLG's 'radar'. This would make sense, because MHCLG has already amended physical inspection requirements in a number of other pieces of planning legislation under the Town and Country Planning

14 https://www.gov.uk/guidance/coronavirus-covid-19-planning-update#local-plans
15 https://www.gov.uk/guidance/plan-making#covid19

(Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England) (Coronavirus) (Amendment) Regulations 2020.[16]

The approach taken has been to dispense with the requirement to make documents available for physical inspection for a temporary period, while COVID-19 'lockdown' restrictions continue, provided that the information is published on a website whose details are advertised.

It seems likely that similar amendments may be made to the 2012 Regulations in due course, at which point LPAs may be able to progress Local Plans once more. In the meantime, LPAs should cease to progress elements of Local Plan-making where physical inspection is required, in order to minimise procedural risk.

16 Specifically, the Town and Country Planning (Development Management Procedure) (England) Order 2015, article 15(7) (publicity for planning applications), 40 (planning register); the Planning (Listed Buildings and Conservation Areas) Regulations 1990, regulations 5, 5A (publicity for listed building consent and planning applications); Town and Country Planning (Environmental Impact Assessment) Regulations 2017, regulation 23.

CONTRIBUTORS

Richard Harwood OBE QC

richard.harwood@39essex.com

Richard specialises in planning, environment, public and art law, appearing in numerous leading cases including SAVE Britain's Heritage, Thames Tideway Tunnel, Chiswick Curve, *Dill v SoS* and Holborn Studios. Recent cases include housing, retail, minerals, environmental permitting, nuisance, development consent orders, and development plans. He is a case editor of the Journal of Planning and Environment Law and the author of Planning Permission, Planning Enforcement (3rd Edition pending) and Historic Environment Law and co-author of Planning Policy. He is also a member of the Bar Library, Belfast. To view full CV click here.

Stephen Tromans QC

stephen.tromans@39essex.com

Stephen is recognised as a leading practitioner in environmental, energy and planning law. His clients include major utilities and industrial companies in the UK and elsewhere, banks, insurers, Government departments and agencies, local authorities, NGOs and individuals. He has been involved in some of the leading cases in matters such as environmental impact assessment, habitats, nuisance, and waste, in key projects such as proposals for new nuclear powerstations, and in high-profile incidents such as the Buncefield explosion and the Trafigura case. To view full CV click here.

Jonathan Darby

jon.darby@39essex.com

Jon is ranked by Chambers & Partners as a leading junior for planning law and is listed as one of the top planning juniors in the Planning Magazine's annual survey. Frequently instructed as both sole and junior counsel, Jon advises developers, consultants, local authorities, objectors, third party interest groups and private clients on all aspects of the planning process, including planning enforcement (both inquiries and criminal proceedings), planning appeals (inquiries, hearings and written representations), development plan examinations, injunctions, and criminal prosecutions under the Environmental Protection Act 1990. Jon is currently instructed by the Department for Transport as part of the legal team advising on a wide variety of aspects of the HS2 project and has previously undertaken secondments to local authorities, where he advised on a range of planning and environmental matters including highways, compulsory purchase and rights of way. Jon also provides advice and representation in nuisance claims (public and private), boundary disputes and Land Registration Tribunal matters. To view full CV click here.

Ruth Keating

ruth.keating@39essex.com

Ruth is developing a broad environmental, public and planning law practice. She has gained experience, during pupillage and thereafter, on a variety of planning and environmental matters including a judicial review challenge to the third runway at Heathrow, protected species, development and land use classes, enforcement notices and environmental offences. Last year Ruth was a Judicial Assistant at the Supreme Court and worked on several environmental, planning and property cases including R (on the application of Lancashire County Council); R (on the application of NHS Property Services Ltd) (UKSC 2018/0094/UKSC 2018/0109), the Manchester Ship Canal Company Ltd (UKSC 2018/0116) and London Borough of Lambeth [2019] UKSC 33. She is an editor of the Sweet & Maxwell Environmental Law Bulletins. To view full CV click here.

Tom van der Klugt

tom.vanderklugt@39essex.com

Tom accepts instructions across all of chambers' practice areas. Before transferring to the Bar, Tom trained as a commercial solicitor at Freshfields, qualifying into the firm's litigation practice with a specialism in environmental, product liability and regulatory disputes. He worked on a number of major corporate investigations and class actions, as well as general commercial litigation and advisory pieces. During pupillage Tom assisted on a number of environmental law matters and, including advice in relation to the CITES regime. To view full CV click here.

Chief Executive and Director of Clerking: Lindsay Scott
Senior Clerks: Alastair Davidson and Michael Kaplan
Deputy Senior Clerk: Andrew Poyser

clerks@39essex.com • DX: London/Chancery Lane 298 • 39essex.com

LONDON
81 Chancery Lane,
London WC2A 1DD
Tel: +44 (0)20 7832 1111
Fax: +44 (0)20 7353 3978

MANCHESTER
82 King Street,
Manchester M2 4WQ
Tel: +44 (0)16 1870 0333
Fax: +44 (0)20 7353 3978

SINGAPORE
28 Maxwell Road #04-03 & #04-04
Maxwell Chambers Suites
Singapore 069120
Tel: +65 6320 9272

KUALA LUMPUR
#02-9, Bangunan Sulaiman,
Jalan Sultan Hishamuddin
50000 Kuala Lumpur, Malaysia
Tel: +(60)32 271 1085