

### Response to Request for Information

**Reference** EIR 081547 **Date** 10 August 2015

### **Himley Crescent**

#### Request:

Please disclose all documentation in any form relating to the application you made to the Secretary of State for DEFRA on the 27th June 2014 with reference to Section 8 of the Allotments Act 1925 in relation to the above land

### Response:

Our response is based on the assumption that you are referring to the intended disposal of the property during 2014 /2015.

Attached is the application that was submitted to the Minister to seek approval along with email information to support the application. No decision has been received from the Minister.

Regarding the disclosure of certain discussions and correspondence, the Council is of the view that this would constitute the disclosure of information covered by a claim of Legal Professional Privilege and that the exception at Regulation 12(4) (e), relating to the disclosure of internal communications is engaged.

The Council considers that there is a strong element of public interest inbuilt into such privilege itself and equally-strong countervailing considerations would need to be adduced to override that inbuilt public interest.

In considering the public interest for and against disclosure in this case, the Council has considered that the public interest in disclosing details of legal advice received and allowing of scrutiny of actions of public officials acting on that advice, is in this instance outweighed by the public interest in allowing the Council to seek advice from its legal advisers in confidence, without fear of it being disclosed to the wider world (which is how any disclosure under EIR must be considered).

In respect of information relating identities and contact details of Council officers and others such as third parties (applicants and their representatives) involved in this process, the Council considers that this meets the definition for personal data set out in Section 1(1) of the Data Protection Act 1998 ("DPA") as:

#### [NOT PROTECTIVELY MARKED]

"data which relate to a living individual who can be identified - (a) from those data, or (b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual"

The Council thus considers that the requested information is caught by the exception to disclosure contained in Regulation 13 EIR, which relates to personal data.

To explain further, a disclosure made under the provisions of the EIR is judged to be a disclosure to the wider world and here the Council must consider disclosure of personal information in line with the provisions of the DPA.

In this instance it is judged that the personal data relating to these named individuals is being processed by the Council for the purposes of providing property management services and not for any wider disclosure purposes.

Individuals involved, with the exception of named council officers involved would also have no reasonable expectation that their details would be disclosed to the world-at-large.

Any disclosure of this information would be judged in this instance to breach DPA principles, notably the first principle – that of fair and lawful processing and the second principle-that of processing for specified and not-incompatible purposes.

Names and direct contact details have thus been redacted (removed) in this instance.

SECTION &

James



### Jenny Dell

From:

Jenny Dell

Sent:

06 May 2014 12:18

To:

**Gary Swift** 

Subject:

RE: NOT PROTECTIVELY MARKED - Himley Crescent

Thank you Gary.

Jenny Dell

Estate Surveyor Delivery

Wolverhampton City Council

From: Gary Swift

Sent: 06 May 2014 12:01

To: Jenny Dell

Subject: NOT PROTECTIVELY MARKED - Himley Crescent

Hi Jen

I have gone through the historical mapping and all I can say is it was built between 1946 and 1959.

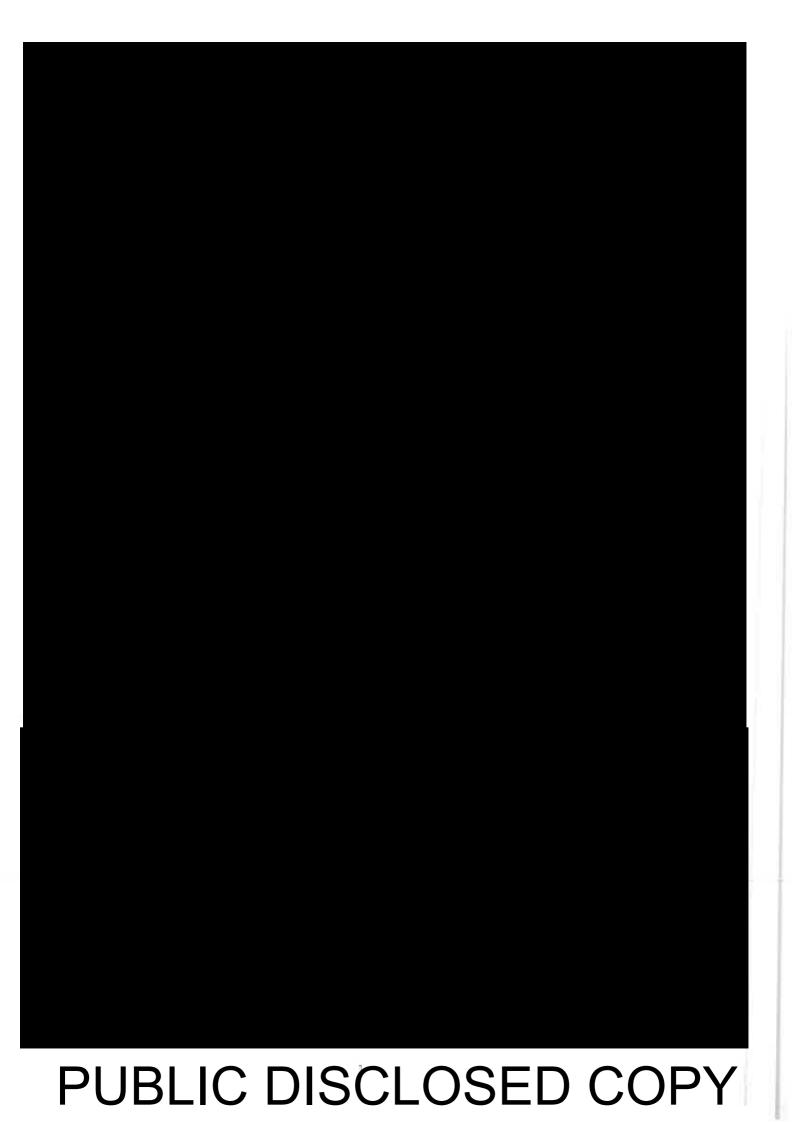
Regards

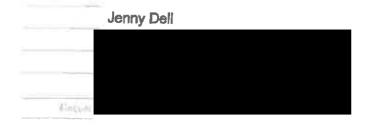
**Gary Swift** 

Systems Support Officer, Education & Enterprise

vvolvernampton City Council







(Trustee of
Himley Crescent Allotment Association)
30 Rosemary Avenue
Goldthorn Park
Wolverhampton
WV4 5BT



#### **Delivery**

Civic Centre, St Peter's Square Wolverhampton, WV1 1RL Main Switchboard (01902) 556556 Website www.wolverhampton.gov.uk

> CL/JRD/P Misc 6 11 June 2014

Dea

### Goldthorn Assembly Hall, Himley Crescent, Godithorn Park

I refer to a recent telephone conversation in respect of the above mentioned property and write to advise that the Council proposes to sell the above mentioned property.

If you have any comments in respect of the above sale I look forward to hearing from you by 25 June 2014. Please feel free to share this information with other Trustees of Himley Crescent Allotment Association.

If you have any questions please do not hesitate to contact me on 01902 555566.

Yours eincerely

Jenny Deli Estates Surveyor Estates & Valuation

### Jenny Dell

From:

Jenny Dell

Sent:

18 June 2014 12:07

To:

'npcu@communities.gsi.gov.uk'

Subject:

Secretary of State Consent - Land/Building adj. to 16 Himley Crescent, Goldthorn Park,

Wolverhampton - Not Protectively Marked

#### Good morning

The Council propose to dispose of the above mentioned property and I ask to request an application in respect of this.

Should you require any further information please do not hesitate to contact me.

I look forward to hearing from you.

Jenny Deli

Estate Surveyor Delivery

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#### **Jenny Dell**

From:

Jenny Dell

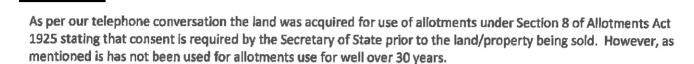
Sent:

To:

Subject:

Glary or State Consent - Land/Building adj. to 16 Himley Crescent, Goldthorn

Park, Wolverhampton - Not Protectively Marked



#### Jenny

From:

@communities.gsi.gov.uk]

Sent: 19 June 2014 09:36

To: Jenny Dell

Subject: RE: Secretary of State Consent - Land/Building adj. to 16 Himley Crescent, Goldthorn Park, Wolverhampton - Not Protectively Marked

Jenny,

Thank you for the further details, unfortunately, I'm still not clear why disposal of the above property would require the Secretary of State's consent.

Thank you

Planning Casework Officer National Planning Casework Unit 5 St Philips Place, Colmore Row

Birmingham, B3 2PW

From: Jenny Dell

Sent: 19 June 2014 09:28

To: NPCU

Subject: RE: Secretary of State Consent - Land/Building adj. to 16 Himley Crescent, Goldthorn Park, Wolverhampton

- Not Protectively Marked Importance: High

Dear

Thank you for your email.

The property hatched red on the attached plan has been used for over 30 years as community use and of recent has been hired out for 2 hours per week for community use. This property has proven to be too expensive to run and is therefore not viable for the Council to retain. It has therefore been recommended that the property is sold by private treaty, tender or auction.

I look forward to hearing from you.

Jenny Dell Estate Surveyor, Delivery

Wolvernampton City Council



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### Jenny Dell

From:

Jenny Deli

Sent:

To:

Subject:

creary or State Consent - Land/Bullding adj. to 16 Himley Crescent, Goldthorn

Park, Wolverhampton - Not Protectively Marked

Hello



Thank you for your email and the relevant links.

Regards

Jenny Dell

Estate Surveyor, Delivery

wowernampton Gity Gognicii

From

Sent: 19 June 2014 10:31

To: Jenny Dell

Subject: RE: Secretary of State Consent - Land/Building adj. to 16 Himley Crescent, Goldthorn Park, Wolverhampton

@communities.asi.aov.ukl

- Not Protectively Marked

Jenny,

Please see below a link to the allotments disposal documents, including the up to date guidance and the application form. Consultation with the National Allotment Society is one of the policy criteria, and is mentioned in the guidance in paragraph 3.7. A link to the National Allotments Society website, which includes contact details, is also below. If you have any further queries, or would like to discuss in any detail, please let me know.

https://www.gov.uk/government/publications/allotment-disposal-guidance-safeguards-and-alternatives

http://www.nsalg.org.uk/

Thank you

Planning Casework Officer National Planning Casework Unit 5 St Philips Place, Colmore Row Birmingham, B3 2PW

From: Jenny Del

Sent: 19 June 2017 09:20

To: NPCU

Subject: RE: Secretary of State Consent - Land/Building adj. to 16 Himley Crescent, Goldthorn Park, Wolverhampton

- Not Protectively Marked Importance: High

Dear

Thank you for your email.

The property hatched red on the attached plan has been used for over 30 years as community use and of recent has been hired out for 2 hours per week for community use. This property has proven to be too expensive to run and is therefore not viable for the Council to retain. It has therefore been recommended that the property is sold by private treaty, tender or auction.

I hope the above is of assistance and if you require any additional information please do not hesitate to contact me or alternatively I can be contacted on the number listed below.

I look forward to hearing from you.

Jenny Dell

Estate Surveyor, Delivery

@communities.gsl.gov.uk]

Sent: 19 June 2014 07:04

To: Jenny Dell

Subject: RE: Secretary of State Consent - Land/Building adj. to 16 Himley Crescent, Goldthorn Park, Wolverhampton - Not Protectively Marked

Jenny,

Could you provide us with a bit more detail, please, of what the authority proposes, and why an application to the Secretary of State would be required.

Thank you

Planning Casework Officer National Planning Casework Unit 5 St Philips Place, Colmore Row Birmingham, B3 2PW

From: Jenny Dell

Sent: 18 June 2014 12:07

To: NPCU

**Subject:** Secretary of State Consent - Land/Building adj. to 16 Himley Crescent, Goldthorn Park, Wolverhampton: Not Protectively Marked

**Good morning** 

The Council propose to dispose of the above mentioned property and I ask to request an application in respect of this

Should you require any further information please do not hesitate to contact me.

### Jenny Deli

From:

Jenny Dell

Sent:

10 June 2014 16:42

To:

Subject:

RE: Protected - Goldthorn Assembly Hall, Himley Crescent, Goldthorn Park,

Wolverhampton

Thank you Holly

Jenny

From:

Sent: 19 June 2014 16:37

To: Jenny Dell

Subject: FW: Protected - Goldthorn Assembly Hall, Himley Crescent, Goldthorn Park, Wolverhampton

Importance: High

Dear Jenny,

Thank you for your email. I have passed this on to our legal advisor and operations manage get back to you shortly.

who should

Kind Regards,

**Administrator** 



National Society of Alloument and Leisure Gardeners Ltd

O'Dell House, Hunters Road, Corby NN17 51E

Registered in 1930 under the Industrial and Provident Societies Acts NO: 11144R

From: Jenny Dell

Sent: 19 June 2014 15:29

To: natsoc

Subject: Protected - Goldthorn Assembly Hall, Himley Crescent, Goldthorn Park, Wolverhampton

Importance: High

TO WHOM IT MAY CONCERN

Please see attached letter in respect of the above.

Regards

Jenny Dell

Estate Surveyor, Delivery

vvolvernampton City Council

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rustee of
Allotment Association)
30 Rosemary Avenue
Goldthorn Park
Wolverhampton
WV4 5BT



#### Delivery

Civic Centre, St Peter's Square Wolverhampton, WV1 1RL Main Switchboard (01902) 556556 Website www.wolverhampton.gov.uk

> CL/JRD/P Misc 6 11 June 2014

De

### Goldthorn Assembly Hall, Himley Crescent, Godlthorn Park

I refer to a recent telephone conversation in respect of the above mentioned property and write to advise that the Council proposes to self the above mentioned property.

If you have any comments in respect of the above sale I look forward to hearing from you by 25 June 2014. Please feel free to share this information with other Trustees of Himley Crescent Allotment Association.

If you have any questions please do not hesitate to contact me on 01902 555566.

Yours sincerely

Jenny Dell Estates Surveyor Estates & Valuation



The National Allotment Society (NSALG Ltd)
O'Dell House
Hunters Road
Corby
Northampton
NN17 5JE

By email and letter



Delivery

Civic Centre, St Peter's Square Wolverhampton, WV1 1RL Main Switchboard (01902) 556556 Website www.wolverhampton.gov.uk

> CL/JRD/H 90/3 19 June 2014

Dear Sir/Madam

Proposal to dispose of the former Goldthorn Assembly Hall, adj. 16 Himley Crescent, Wolverhampton, WV4 5DA

The Council holds the Deeds for the above mentioned site dating back since 1951 and as part of the conveyancing Goldthorn Assembly Hall and the Allotment site were acquired for the use of allotments under Section 8 of the Allotments Act 1925 and requires Secretary of State Consent for any disposal. The adjoining site known as Himley Crescent Allotment have a 15 year lease with the City Council commencing 23 November 2010, however, this allotment site does not form part of the wider disposal proposal (see allotment site plan).

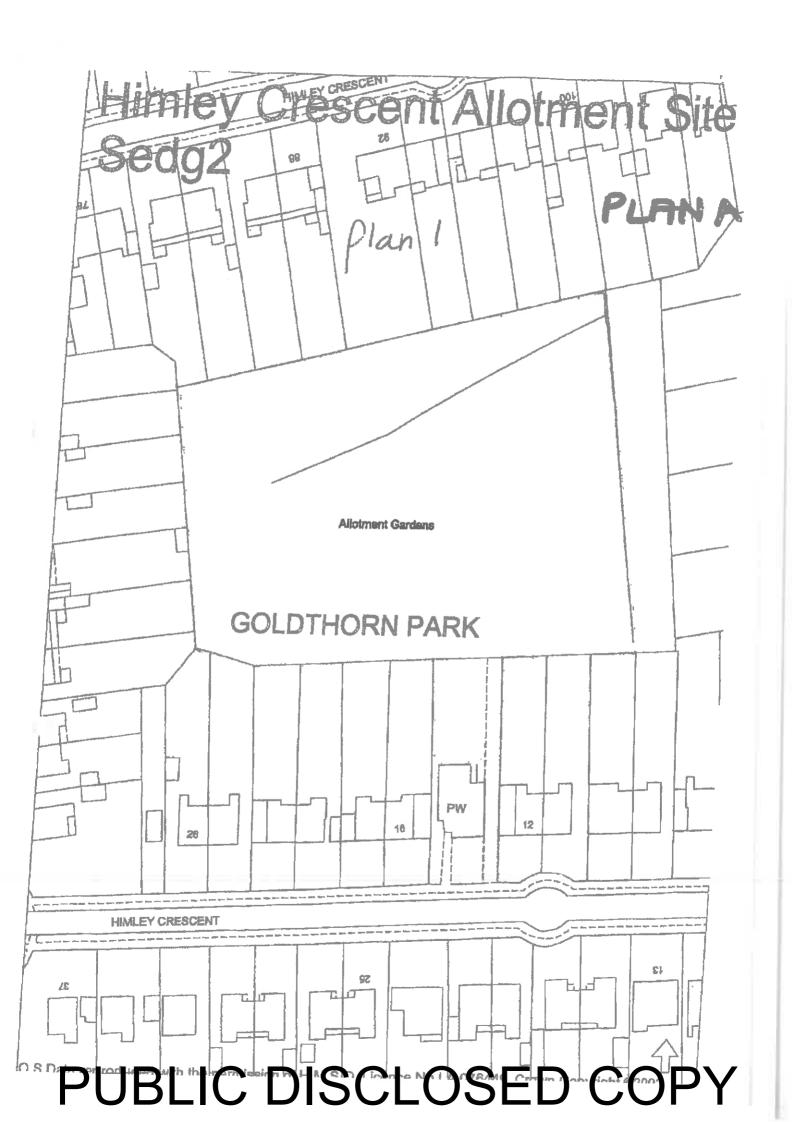
Despite Goldthorn Assembly Hall being used as community use dating back at least 30 years I write to advise, due to the building being economically unviability, the Council proposes to sell the freehold via private treaty, tender or auction (see plan hatched in red attached).

With this in mind, I write to ask if you have any objections in relation to the disposal.

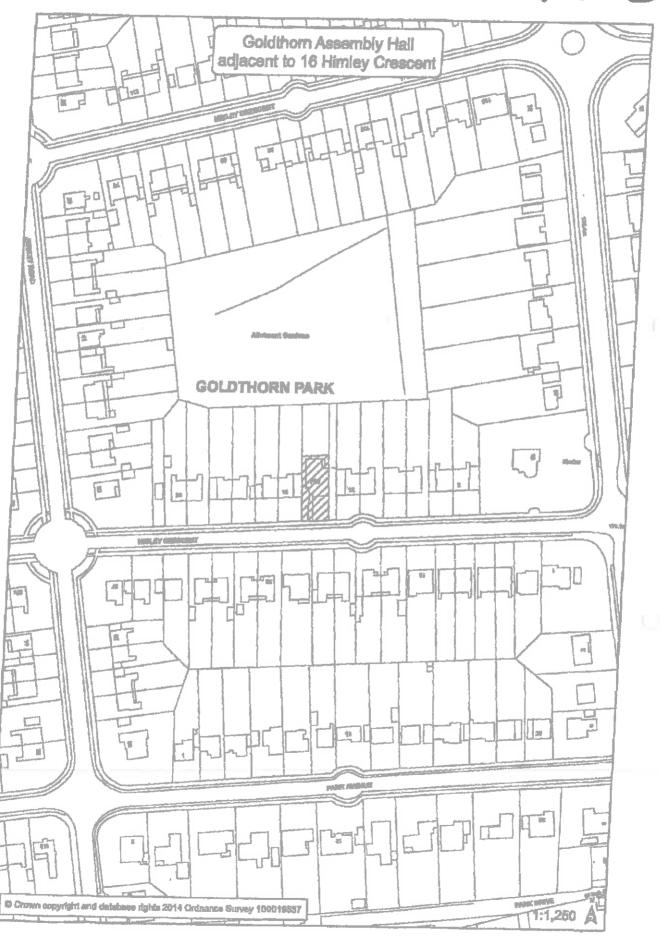
I look forward to hearing from you in respect of the above, however, if you require any further information in respect of this please to do not hesitate to contact me or alternatively you can give me a call on 01902 555566.

Yours faithfully

Estates Surveyor
Estates & Valuation
Corporate Landlord



PLANB



3. The authority has actively promoted and publicised the availability of sites and have consulted the National Allotment Society Q23. Which of the following have you done to actively promote and publicise the availability of allotment sites across the council area? a) web sits or other social media (eg Twitter) b) Distributed leaflets c) Displayed posters d) Placed an announcement in newspapers/ specialist press or on local radio station? e) None of the above Select all that are appropriate. If you would like to provide more information about your answer, please do so here. If you have answered (e), please explain what alternative methods you have used to promote and publicise allotment sites in your borough. None as the Assembly Hall is not part tof the allotment site. Q24. Have you consulted with the National Allotment Society? Yes Please provide copies of all correspondence with the Society If you are claiming an exception to the criteria should apply, please provide your explanation here. n/a 4. The implications of disposal for other relevant policies, in particular development plan policies, have been taken into account. Q25. Is the existing allotment site specifically referenced in your No council's agreed local or neighbourhood plan\*? If yes, please provide this section of the local or neighbourhood plan. If there are any inconsistencies between the local plan and your intention to dispose of the existing allotment land, please explain below. Q26. Will other council policies be affected by, or have they No influenced, your decision to seek consent to dispose of the existing allotment land? if yes, please provide more information. Q27. Will any national Government policies be affected by, or have No they influenced, your decision to seek consent to dispose of the existing allotment land? if yes, please provide more information If you are claiming an exception to the criteria should apply, please provide your explanation here.

\*A neighbourhood plan is agreed when it has been voted for in a referendum.

# SECTION 4: CHECKLIST OF EVIDENCE AND SUPPORTING INFORMATION

The form below is intended to help speed up the decision making process with your application.

You can use it to check that you have provided all the information and evidence the NPCLI will use when determining your application.

Question Number	Document	Relevant to provide	Provided
1	Map highlighting existing and alternative site	Yes	Yes
12	Copies of correspondence (letters, emails) showing objections/support for proposals	Yes	Yes
14	Evidence you've secured land for use as allotments	Yes	No
22	Correspondence showing reasons for refusing plot on existing site	Yes	No
23	Methods for publicising and promoting availability of allotment sites (information and copies)	Yes	No
24	Copies of correspondence with National Allotment Society	Yes	Yes
25	Relevant section of Local Plan	Yes	No
26	Other Council policies	Yes	No
27	National Government policies	Yes	No

### Contact

National Planning Casework Unit 5 St Philips Place Colmore Row BIRMINGHAM B3 2PW

Tel: 0303 44 48050

e-mail: npcu@communities.gsi.gov.uk

If there is a difference, please explain why. Q12. What is the distance, in miles, of the alternative site from Distance the existing site? of 4m Please provide a map highlighting the existing site and the proposed alternative. If the distance from the alternative site is more than % mile from the existing site, please explain why. Q13. Have you received objections from existing plot-holders or interested third parties? Q14. Is the alternative site currently: a) Council owned land b) Commercially owned land Q15: What evidence have you obtained to show you have secured the use of the land for allotments? n/a SECTION 3: POLICY CRITERIA 1: The allotment in question is not necessary and is surplus to requirement Q15: How many cultivated plots are there on the existing site? n/a Q16. How many plots are currently occupied on the existing site n/a Q17. How many people are there on the waiting list for the n/a existing site? Q18. Has the waiting list been closed? No if yes, at what number have you closed it? if you are claiming an exception to the criteria should apply, please provide your explanation here. 2: The number of people on the Waiting List has been effectively taken into account Q18. How many people are there on the waiting list/s for other n/a sites in the Council's area? Q19. Have the waiting lists for any of these other sites been NA closed? If yes, at what number have these lists been closed? See If N/A, please explain why notes on. Page 1 82

Q19. Have any of the people on the other waiting list/s been offered a plot on the existing site?

N/A

If no, please explain why not.

Q20. Did any of those offered a plot on the existing site accept?

N/A

Q21. If so, how many?

n/a

Q22. If people refused a plot on the existing site, what reason/s did they provide?

n/a

Please provide copies of this correspondence

If you are claiming an exception to the criteria should apply, please provide your explanation here.

There are no allotment plots affected from this because in addition to the allotment site there is an adjoining car park which forms part of the lease terms (see Pian A attached). A letter has been sent to the Allotment Association advising them that the Council proposes selling the property and asking that they put their comments in writing (if applicable). To date I have not received any communication in respect of this. (see attached letter dated 11 June 2014).

## Application for Secretary of State Consent to Dispose of Statutory Allotment Land - Allotment Act 1925

### YOUR DETAILS

Local Authority Name: Your Name: Telephone Number: Email Address: Postal Address:	Wolverhampton City Jenny Dell Crvic Centre St Peter's Square Wolverhampton	Council Post Code	WV1 1RL
Alternative Contact Detail Name: Robert Baldwin	is (if required)		
Fmall <sup>,</sup>			
Postal Address: Civic Centr Square, Wolverhampton	re,St Péter's Post Co	de: WV1 1RL	
SECTION 1: GENI YOUR APPLICATI		TION ABO	UT
Name of Aliotment Site to is locally known) Himley Crecent Aliotment	Site, Himley Crescent		
Q1. What is the nature of t a) Sale b) Lease c) Change of use	he disposai?		
Please provide more information in the Council holds the Deeds conveyance dated 31 Octobe Sedgley Urban District Council of the Urban District Council of the Urban District Coldthorn Assembly Hall and the use of allotments under Secretary of State Consent for the Urban District	for the above mentioner or 1951 between the Earl cil. Wolverhampton City t Council. Part of the alic the whole of the Aliotment section 8 of the Aliotment	d site by virtue of of Dudley and of Council is the subtreent site compant site acquired act 1925 and its Act 1925 and its site was acquired act 1925 and its a	of a  others and uccessor  orises  uired for requires

Crescent Allotment have the benefit of a 15 year lease with the City Council commencing 23 November 2010, however, this allotment site does not form part of the disposal proposal (see allotment site plan A attached). As afar as the Council is aware, Goldthorn Assembly Hall has never been used at part of the allotments and as part of the Council's rationalisation of the land and property assests has been earmarked for disposal on the open market (see plan B).

Q2. What are your reasons for disposing of the site/this part of	
the site?	X
a) Redevelopment	
b) Redistributing supply	
c) Soil contamination	$\Box$
d\ Lask of demand	

Please provide more information if you feel this would be helpful. See notes of 2<sup>nd</sup> and 3<sup>rd</sup> page. It is not the intention to dispose of any of the allotment site only the building which has not been used for allotments use since the property was built which I under stand was between 1946 and 1959.

### **SECTION 2: STATUTORY CRITERIA**

Adequate atternative provision will be made for displaced plot holders or that such provision is not necessary or is impracticable

Q3. Are you seeking to dispose of:	
a) Whole site b) Part of the site	
Q4. How many plots are you intending to dispose of?	n/a
Q5. How many plot holders will be affected by the disposal if consent is granted?	n/a
Q6. What is the size, in hectares, of the area to be disposed of?	270m2
Q7. Have you secured alternative allotment provision?	No
If no, please expiain why not.	
Q8. What is the size, in hectares, of the alternative site?	n/a
Q9. How many plots will there be on the alternative site?	n/a
Q10. What is the size, in square metres of the plots on the existing site?	n/a
Q11. What is the size, in square metres, of the plots on the	n/a



National Planning Casework Unit 5 St Philips Place Colmore Row Birmingham B3 2PW

By email and letter



#### Delivery

Civic Centre, St Peter's Square Wolverhampton, WV1 1RL Main Switchboard (01902) 556556 Website www.wolverhampton.gov.uk

> CL/JRD/H 90/3 27 June 2014

Dear Sir/Madam

Proposal to dispose of the former Goldthorn Assembly Hall, adj. 16 Himley Crescent, Wolverhampton, WV4 5DA

Please find attached an application in respect of the above. I have also emailed this to at your organisation on 26 June 2014.

I look forward to hearing from you.

Yours faithfully



Jenny Dell Estates Surveyor Estates & Valuation

### **Jenny Deli**

From:

Jenny Dell

Sent:

02 July 2014 11:36

To: Cc:

Subject:

Not protectively Marked: SoS consent for Goldthorn Assembly Hall, Himley Crescent,

Wolverhampton

Importance:

High

Hello

i refer to the above application that was sent to you last week. I was wondering if you would be in a position to indicate a timescale for the process.

**Kind Regards** 

Jenny Deli

Estate Surveyor, Delivery

Wolverhampton City Council

Jenny Dell	
From: Sent: To: Co: Subject:	Jenny Dell 03 July 2014 16:42 RE: Not protectively Marked: SoS consent for Goldthorn Assembly Hall, Himley Crescent Wolverhampton
Thank you E	
I am on leave from today un please? Regards	til 10 <sup>th</sup> July. Is it possible if you could indicate the timescale to deal with this matter
Jenny Dell Estate Surveyor, Deliver	
From: Sent: 03 July 2014 09:30 Fo: Jenny Dell Subject: RE: Not protectively	@communities.gsi,gov.uk]  Marked: SoS consent for Goldthorn Assembly Hall, Himley Crescent, Wolverhampton
ienny, This application has been pas	sed to my colleague who will be in touch once he has had on opportunity or
hank you	

From: Jenny Del

Sent: 02 July 2014 11:36

Planning Casework Officer National Planning Casework Unit 5 St Philips Place, Colmore Row

Birmingham, B3 2PW

To:

Subject: Not protectively Marked: SoS consent for Goldthorn Assembly Hall, Himley Crescent, Wolverhampton

Importance: High

Hello

I refer to the above application that was sent to you last week. I was wondering if you would be in a position to indicate a timescale for the process.

**Kind Regards** 

Jenny Dell Estate Surveyor, Delivery

Wolvernampton City Council



### mycouncil@wolverhampton.gov.uk

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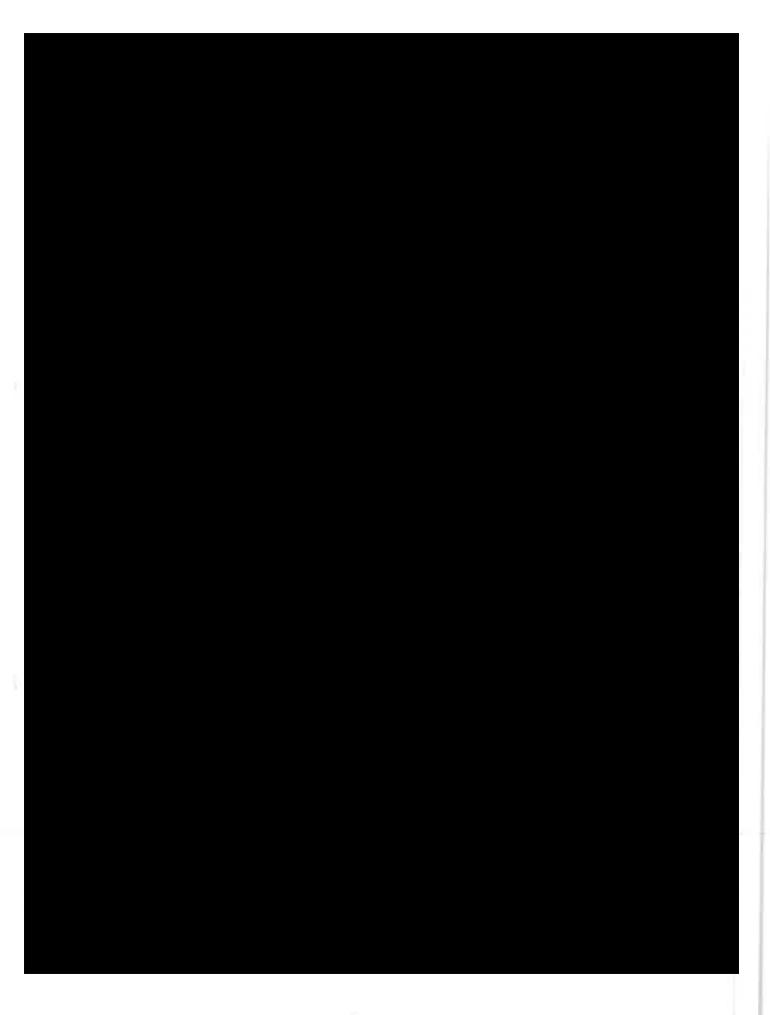
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### **Jenny Dell**

From:

Jenny Dell

Sent: To: 16 July 2014 14:51 nsalg.org.uk

Cc:

Nicola Balley

Subject: Attachments: Protected: Golthorn Assembly Hall, Himley Crescent, Goldthorn Park, Wolverhampton Sp10354414071613480.pdf; RE: Protected - Goldthorn Assembly Hall, Himley Crescent,

Goldthorn Park, Wolverhampton

Importance:

High

Dear Sir/Madam

I refer to the letter attached which was acknowledged on 19 June 2014 and was wondering if you were in a position to respond.

I look forward to hearing from you or alternatively if you wish to discuss this matter please feel free to contact me on the number listed below.

Kind regards

Jenny Deli Estate Surveyor, Delivery

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### Jenny Deli

From:

Jenny Dell

Sent:

01 August 2014 15:10

To:

@communities.gsi.gov.uk

Subject:

Goldtnorn Assembly Hall, Himley Crescent, Goldthorn Park, Wolverhampton

Importance;

High

Heli

I refer to recent correspondence in respect to the above.

I was wondering if you were in a position to update me on the progress in respect of the application for Secretary of State Consent?

Hook forward to hearing from you.

Jenny Dell

Estate Surveyor, Delivery

worvernampton City Council

### Jenny Dell

From:

Jenny Dell

Sent:

06 August 2014 14:45

To:

@nsalg.org.uk)

Subject:

Not protectively Marked; Goldthorn Assembly Hall, Himley Crescent, Goldthorn

Park

Importance:

High



I refer to an email that I sent to you on 17 July in respect of the above. You were kind enough to advise that a lady name was dealing with this matter. I do not have a contact number for her and was wondering whether there was any progress in respect of the above mentioned site.

I look forward to hearing from you.

Jenny Dell

Estate Surveyor, Delivery

Wolverhampton City Council

## Allotments Act SELTION 8

### Jenny Dell

From:

Jenny Dell

Sent:

15 August 2014 09:17

To:

y@nsalg.org.uk)

Cc:

David Harris (Property Services)

Subject:

FW: Not protectively Marked; Goldthorn Assembly Hall, Himley Crescent, Goldthorn

Importance:

High

Hello

Frefer to my email below.

Please note that I will be leaving the authority today therefore all future correspondence should be emailed to David Harris a

Regards

Jenny Dell

Estate Surveyor, Delivery

Wolverhampton City Council

From: Jenny Dell

Sent: 06 August 2014 14:45 To 

ubject: Not protectively Marked; Goldthorn Assembly Hall, Himley Crescent, Goldthorn Park

Importance: High

Hello

I refer to an email that I sent to you on 17 July in respect of the above. You were kind enough to advise that a lady as dealing with this matter. I do not have a contact number for her and was wondering whether there was any progress in respect of the above mentioned site.

I look forward to hearing from you.

Jenny Dell

Estate Surveyor, Delivery

Wolverhampton City Council