

Compulsory purchase orders: 2017 update

Planning and housing CPOs 2003-2016 summary



Foreword

“Compulsory purchase can be incredibly helpful to investment and community building, when used appropriately by local authorities, helping them bring forward much-needed housing and package parcels of land in ways that support regeneration. Despite its benefits, this report confirms that CPO remains an under-used process – particularly when compared to the frequency of applications during the pre-recession period.

With the country facing a housing crisis, proposals for Garden Towns/Villages and more development on complex urban sites will likely gather pace and local authorities therefore need to be supported in the understanding of the tools at their disposal. Increased use of CPOs will not act as a silver bullet to addressing these challenges, and there are other means of supporting the development of new housing and regeneration – better resourcing of planning departments; improved and more transparent engagement between the public and private sector; and innovative thinking around infrastructure funding, for example. However, even if we are to accept these relatively low levels of use as the “new normal”, it is clear that increasing its use could still go a long way to unlocking more sites and more housing.

This report finds that CPO remains a complicated and expensive process. Reforms proposed in the previous Parliament would help simplify this process, but are yet to come into force, and we would urge Government to bring these forward and consider how to go further in their reform. Empowering and encouraging local authorities to be more proactive with the use of CPOs will likely go a long way.

Legislative change will no doubt prove difficult within the current parliamentary constraints, and Government will look to the industry to come forward with ideas, and evidence, to help support its agenda. The BPF therefore welcomes the findings and recommendations of this excellent report as it adds to a helpful body of evidence, and looks forward to working with Womble Bond Dickinson, Government and all our members to bring forward much-needed reform and regeneration.”

**Melanie Leech,
Chief Executive,
British Property Federation**



Introduction

This is the fourth in our series of reports looking at the usage and success rates of Compulsory Purchase Orders (CPOs), principally those made under the Town and Country Planning Act 1990 s226 (1)(a) (ie **Planning CPOs**) and those made under the Housing Act 1985 s17 (ie **Housing CPOs**).

In our previous reports we have assessed Housing and Planning CPOs both quantitatively and qualitatively.

Our first report in 2010 contained a statistical analysis of the outcomes of CPOs, analysing how many were confirmed (with or without modifications), how many were not confirmed and how many were treated as withdrawn. The report also reviewed Secretary of State decisions and case law.

Our second report in 2012 contained a purely statistical update of the figures through to the end of 2011.

Our third report in 2015 was a more extensive review containing both a statistical update and a detailed review of Secretary of State decisions through to the end of 2014. The report also included details of levels of implementation of confirmed Orders based on information collated from Acquiring Authorities.

This fourth report in our series continues the statistical assessment through to the end of 2016 and looks at Secretary of State “not confirmed” decisions in 2015-2016; ie it seeks to identify why some CPOs were not confirmed.

In large part, this report echoes many of the key messages of previous reports:

- CPOs are a vital tool for regeneration
- Success rates for both Planning and Housing CPOs remain high
- There are a range of reasons, from technical to evidential, why some CPOs were not confirmed
- A significant number of local authorities make use of compulsory purchase powers but generally do so sparingly.

However, this report additionally makes the following findings.

As regards the statistical assessment:

- In 2015, 57 Planning CPOs and 54 Housing CPOs were submitted respectively. In 2016, 40 Planning CPOs and 39 Housing CPOs were submitted. These figures are toward the lower end of the range of CPOs submitted annually in the years 2003-16 covered by our previous research. Moreover, the range of 40-60 CPOs per year for both Planning and Housing CPOs reflects the “new normal”.
- Both Planning CPOs and Housing CPOs continue to demonstrate high levels of success.
- The figures indicate that:
 - for Planning CPOs at least 87% in 2015 and 82% in 2016 succeeded. This may be even higher when considering withdrawn CPOs due to acquisition by agreement
 - for Housing CPOs the equivalent figures are at least 79% in 2015 and 88% in 2016.
- This level of success is consistent with previous years and demonstrates an established, long-term trend.
- In terms of the time taken to determine CPOs, there is continuity for unopposed Orders. For example, unopposed Housing CPOs were determined on average in 70 days as compared with an average 63 days in 2013, the last year for which comparative figures are available. Similarly the figures for unopposed Planning CPOs would suggest (subject to the adjustments noted below) that the average is 98 days, identical to the 2013 figure.
- In short, it takes on average two months for an unopposed Housing CPO to be determined once it is submitted to the Secretary of State for confirmation and three months for an unopposed Planning CPO.
- For both opposed Housing and Planning CPOs it appears to be taking longer to determine these. Most significantly, opposed Housing CPOs would appear to be taking three times as long to determine as they did in 2013, notwithstanding that it may be assumed that most were determined by way of written representations.
- We have collated all Planning and Housing CPOs submitted between 2003 – 2016 by region. As previously reported, the North West of England and London regions predominate in terms of totals of CPOs submitted.
- Within the regional figures, however, there is a wide range of usage. The data supports our previous conclusions that:
 - Many authorities have used their compulsory purchase powers but do so sparingly
 - A relatively small number of authorities account for a significant proportion of CPOs made.

1. Public Sector Equality Duty
2. European Court of Human Rights

We have reviewed the reasons why the Secretary of State has not confirmed Housing and Planning CPOs in 2015-2016.

- The reasons for non-confirmation of Housing CPOs include:
 - Whether the property is vacant or in limited use – assessment of extent of actual use of the property
 - Individual circumstances of the owner
 - Degree of harm caused by the CPO and insufficient to warrant confirmation
 - Engagement of PSED¹ and ECHR² – including a failure to accommodate disabilities
 - Failure to show CPO was being used as a “last resort”,
 - Compliance with an undertaking whilst not fulfilled by the owner but sufficient work had been undertaken
- The reasons for non-confirmation of Planning CPOs include:
 - Conflict with Ministerial Statement
 - Failure to assess alternative schemes
 - No longer any need for confirmed Order
 - Late attempt to change purpose of Order
 - Owner’s recent limited improvements being sufficient
 - Lack of detail in the Council’s case as to compliance with Guidance (including failure to assess alternatives)
 - Planning permission not being conclusive of need
 - Where the case is finely balanced - ‘benefit of doubt’ to the objector.

There is evidence of an increasingly detailed assessment being required of the individual circumstances of landowners and occupiers when weighing the proportionality of interference with their rights, including the application of the PSED. Significantly

this approach is not limited to the Aylesbury Estate Planning CPO decision (a large phased regeneration scheme which attracted the media headlines) but has also been applied to much smaller, single property Housing CPOs in which the individual circumstances of the respective owners have been considered in detail.

The application of PSED and human rights considerations, on a fine-grained basis, represents a greater focus in approach and requires consideration by an acquiring authority of PSED and human rights both at an early stage of the process of intended acquisition and on an on-going basis; as well as a greater understanding of affected parties’ needs and therefore a greater level of engagement. Omissions cannot readily be rectified at inquiry or written representations stage. Moreover, acquiring authorities are well advised to remember that not only must negotiations be undertaken proactively; they must also be seen to have been undertaken. In opposed cases, the Secretary of State will expect “chapter and verse” of efforts to acquire and negotiate. In finely balanced cases “the benefit of the doubt” may well be given to an owner. This is, perhaps, a lesson which has been taken from the examination of Nationally Significant Infrastructure Projects and the approach being taken to the examination of those applications.

It is difficult to be certain how many CPOs are dealt with by way of written representations as against by way of public inquiry since the National Planning Casework Unit (NPCU) does not keep its records on that basis. However, given the content of Guidance and from experience as practitioners, it may reasonably be assumed that it is the more complex CPOs that are dealt with by way of public inquiry. Those of course tend to be Planning CPOs rather than Housing CPOs. It is notable that five of the eight CPOs not confirmed by the Secretary of State in 2015-2016 were determined by way of written representations, including all of the

Housing CPOs that were not confirmed. Moreover, each of those Housing CPOs took over a year to determine.

Our impression is that more CPOs are being determined by written representations rather than by way of public inquiry. Given that wider use of written representations was intended to produce time-savings it is striking that the opposite, in fact, appears to have happened albeit the sample is relatively small.

The written representations process is front-loaded in that it imposes relatively short deadlines on the acquiring authority to make additional representations and thereafter for additional submissions by both the objector and acquiring authority. Thereafter however, there is no fixed timetable or deadline within which the Secretary of State must make this decision. Anecdotally, it appears that written representation decisions simply join the same queue awaiting an inspector. We would recommend that this aspect of the system be reviewed to check whether our observations are well-founded and, if so, how time-savings can be achieved. At the time of this report’s publication, the provisions of the Housing and Planning Act 2016 to introduce timetables for the determination of CPOs, as well as the ability for inspectors to confirm CPOs, have not been brought into force. Those changes could have the effect of speeding up the process and also provide greater certainty for all involved.

Lastly, where a CPO is limited to a single property (most likely a Housing CPO) but nonetheless the detailed circumstances of individuals are crucial (and possibly determinative) to assessing the proportionality of State interference with rights, then it may be more appropriate in some cases for some form of hearing or inquiry to take place rather than reliance on the basis of written representations.

Statistics

Planning and Housing CPO Statistics 2015 – 2016

Figure 1 below indicates that:

In 2015:

- Local Authorities submitted 57 Planning CPOs. This is almost identical to the 58 Planning CPOs submitted in the previous year, 2014.
- 54 Housing CPOs were submitted, representing a 19% decrease from the 66 submitted in 2014.

In 2016:

- 40 Planning CPOs were submitted. This is the joint second lowest annual total in all the years covered by our research since 2003. In 2009, 40 Planning CPOs were submitted. In 2013, 36, the lowest annual total were submitted.
- 39 Housing CPOs were submitted. This represents a low annual total. Indeed in the years covered by our research only 2012 (with 37 CPOs) saw a lower total of Housing CPOs submitted.

As we have previously reported, in terms of the longer term trend set out in figures 2 and 3, the number of Planning CPOs submitted continue to be within a range significantly lower than pre-recession figures.

To the extent that the use of Planning CPOs can be considered to be a proxy for economic and redevelopment activity, and in particular as a barometer of economic confidence, the longer term annual figures of Planning CPOs in the broad range of 40 – 60 represents the “new normal” at a much lower level.

We have previously caveated our reports to suggest that decreased usage of Planning CPOs continued to reflect subdued economic confidence in previous years because of the long lead-in times to prepare some CPOs. However, that position appears increasingly difficult to sustain. There does not presently appear to be any indication of a revival of Planning CPO usage to pre-recession levels of 70 – 80 per annum.

Levels of Housing CPO usage have tended more to reflect access to public sector funding by local authorities, as opposed to general economic activity. Previous increases in annual figures reflected the undertaking by a small number of Councils of targeted programmes of improvement. The spike in usage in 2013, for example, represented two or three Councils being particularly active in that regard. The submission of 54 Housing CPOs in 2015 and 39 in 2016 respectively fall broadly

within the range of 40 – 60 also displayed in years 2009 – 2012 inclusive. The figures for 2013 therefore increasingly appear to be an outlier as against the broad range of 40 – 60 Housing CPOs submitted per annum.

In previous years we have emphasised the more volatile pattern of Housing CPO submission. That remains the case to this extent. The four highest annual figures during the years covered by this report are all for submission of Housing CPOs (2003, 2004, 2006 and 2013 respectively). From 2009 – 2016, however, in six of these years, the number of Housing CPOs fell within the range of 40 – 60 i.e. very similar to Planning CPOs. 2013 is the outlier in which 92 Housing Orders were submitted followed by 66 in 2014.

We would suggest that such a level now reflects the default level of absent targeted programmes with high levels of usage. The levels experienced in 2015 and 2016 would suggest that the 2013 figure very much represents the exception to the present trend.

Figure 1
Planning and Housing CPOs submitted 2015 – 2016 totals

	2015	2016
Planning CPOs submitted (including those not determined)	57 (23 opposed)	40 (23 opposed)
Housing CPOs submitted (including those not determined)	54 (13 opposed)	39 (4 opposed)

Planning and Housing CPOs submitted 2003 - 2016

The change in the numbers of Planning and Housing CPOs submitted each year for the period 2003 – 2016 is illustrated in Figure 2. The figures for 2015 and 2016, as noted above, are consistent with the figures for 2009 – 2012 inclusive. 2013 is an exceptional outlier for reasons previously analysed. The overall pattern from 2009 onwards suggests that 40 – 60 is the range of Planning CPOs that can reasonably be expected to be submitted each year.

Similarly the level of usage of Housing CPOs, after a spike in 2013 and an above average figure in 2014, has returned to a level of usage very similar to that of Planning CPOs, in the range of 40 – 60 per annum.

Planning and Housing CPOs determined 2003 - 2016

Figure 3 shows the figures for Planning and Housing CPOs determined in any given year broadly track the level and pattern of submissions.

Planning CPOs

Figures 4 and 5 show how Planning and Housing CPOs respectively were determined in 2015 and 2016.

There are relatively few surprises in those results when compared against previous years. The pattern of determination of CPOs remains reasonably consistent.

As indicated in Figure 4, Planning CPOs continue to demonstrate high rates of success:

- The percentage of CPOs confirmed without modification (including those referred back to acquiring authorities for determination) remains high at 58% and 52%, albeit slightly down in 2012 – 14 with figures of 66%, 64% and 67% respectively.

- That decrease is however offset by an increase in Planning CPOs confirmed with modification: 29% in 2015 and 30% in 2016. That contrasts with 9%, 26% and 18% in the prior three years.
- When confirmations, both with and without modifications, are considered the totals for 2012 to 2016 are: 75%, 90%, 85%, 87% and 82% respectively.
- Moreover, orders categorised as “withdrawn” have invariably been withdrawn because acquisition by agreement has been achieved against the background of a CPO such that it is no longer necessary to pursue the CPO. If the figures for “withdrawn” CPOs are added to the confirmations, then in 2015 94% of CPOs may be considered to have succeeded and 91% in 2016.

Housing CPOs

Figure 5 indicates how Housing CPOs were determined in 2015 and 2016. The results for 2015 and 2016 continue the trend set in 2014.

Key points to note include:

- Success rates for Housing CPOs remain high.
- Total confirmations (ie confirmations both with and without modification) were 79% (2015) and 88% (2016) respectively.
- Figures for confirmations without modification (70% in 2015, 72% in 2016) are similar to the 2014 figure (69%) but lower than the figures of 76% in 2010 and 80% in 2013. However all these more recent figures are higher than the averages for previous years for which data is available: 62% (2003 – 2009), 61% (2010) and 68% (2011).
- The figures for confirmations with modifications (9% in 2015, 16% in 2016) are broadly consistent with the range of recent years (14%, 9% and 11% in 2012, 2013 and 2014 respectively).

- The annual percentages for CPOs not confirmed are 2% in 2015 and 6% in 2016. Again these fall within the broad range of recent years: 3% (2012), 6.5% (2013) and 7% (2014).
- As previously, there has been a degree of inconsistency as to how “not confirmed” decisions are recorded by NPCU³ as against “withdrawn”. However, after checking with NPCU the data has been corrected in order that “not confirmed” reflect only those CPOs actively not confirmed by the Secretary of State as against Orders withdrawn by acquiring authorities when acquisition by agreement has been achieved.
- In 2015 14% of CPOs were withdrawn. In 2016 that figure was 6%.
- Possibly the most meaningful assessment of successful use of compulsory purchase is to combine confirmed, confirmed with modifications and withdrawn figures. That produces the following figures: 93% in 2015, 94% in 2016. These figures are consistent with previous years. Success rates may therefore safely be considered to fall within the 90-95% range.

3. National Planning Casework Unit

Figure 2
Planning and Housing CPOs submitted 2003-2016

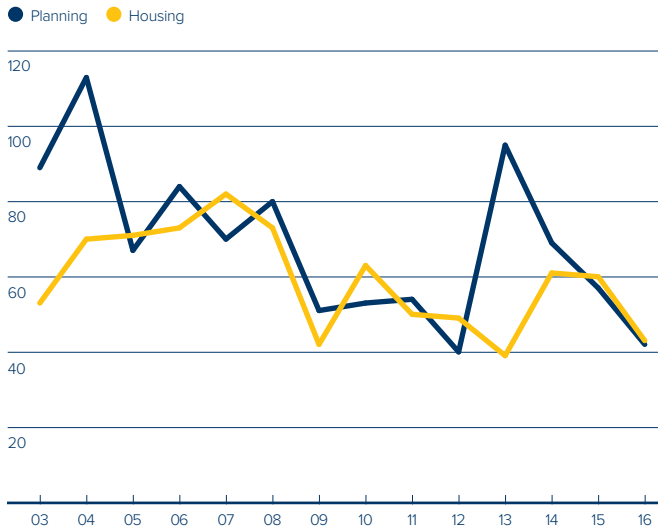


Figure 3
Planning and Housing CPOs determined 2003-2016

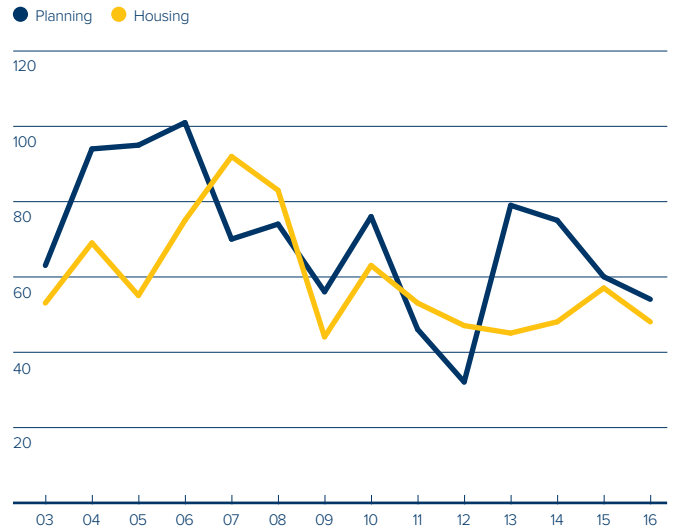
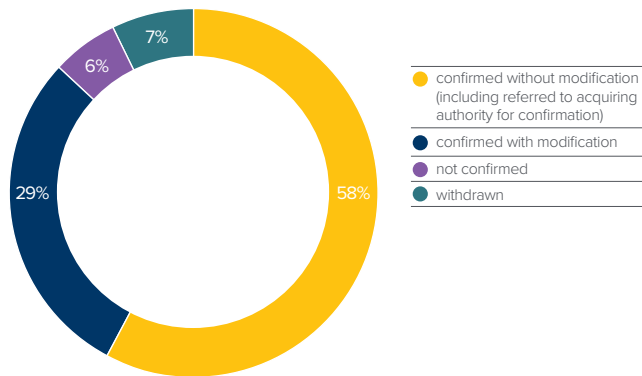


Figure 4
How Planning CPOs were determined 2015



How Planning CPOs were determined 2016

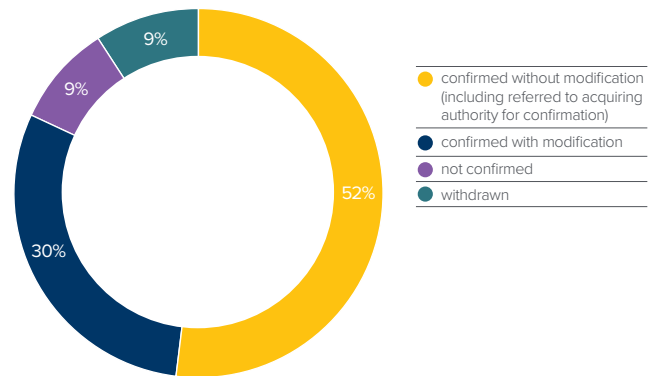
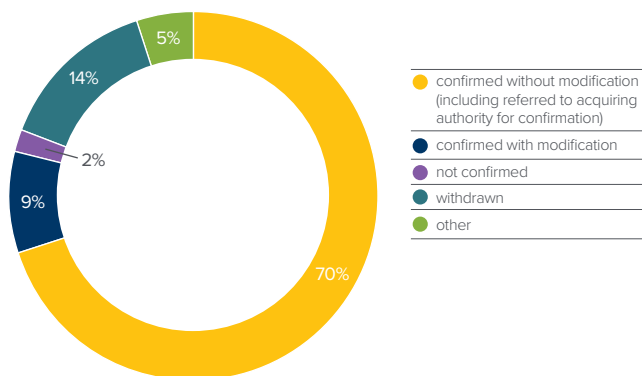
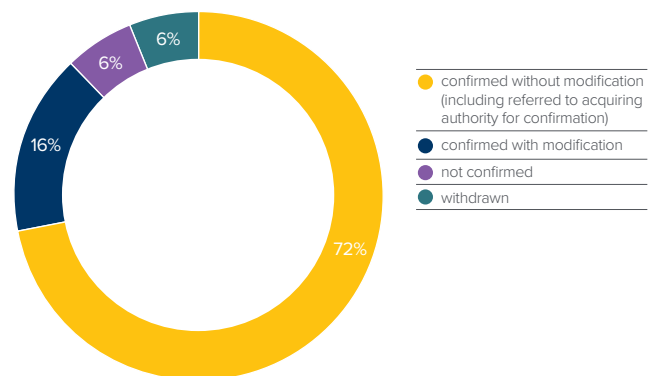


Figure 5
How Housing CPOs were determined 2015



How Housing CPOs were determined 2016



Timescales to determination

Figures 6 to 8 below provide a breakdown of the time taken by the Secretary of State to determine CPOs. These figures represent the time (in days) between first receipt of a CPO by the Secretary of State and the CPO being determined (ie confirmed, not confirmed, remitted to the acquiring authority for decision or treated as withdrawn by letter).

Figure 6
Planning and Housing CPOs determined in 2016

	Opposed (days)	Unopposed (days)
Planning	383	168 (98 excluding 2 outlier decisions)
Housing	420	70

Figure 6 sets out the time taken in 2016 to decide both Planning and Housing CPOs differentiated between those CPOs that were opposed and those unopposed.

The following key points are worthy of note:

- The 2016 Planning CPO figures for opposed orders (383 days) compare with 323 (2012) and 281 (2013) in the last years for which the figures are available.
- The 2016 figure for unopposed Planning CPOs is 164. However, this figure comes with a health warning because it includes two “outlier”

figures of 686 and 906 days respectively for determination of CPOs. These are 2 – 3 times higher than any other unopposed order and may reflect a mis-posting of data. If those figures are excluded, an average of 98 days results. This is in fact, more or less identical to the 2013 Planning unopposed CPOs figure.

- For Housing CPOs, the figure of 70 days for unopposed Orders is in line with the last available figure of 63 days for 2013.
- The average time taken to determine opposed Housing Orders has, however, increased significantly. It was 420 days in 2016, as compared with 296 in 2012 and 119 in 2013, the last years for which figures are available, and so a significant increase in the determination period.
- Looking at the time taken to determine the “not confirmed” Housing CPOs, suggests that these decisions were taking at least a year to determine, even though they all followed the written representations process.
- Indeed what may warrant further investigation is the extent to which the written representations procedure results in time savings. The process is front-loaded in that it imposes relatively short deadlines of the acquiring authority to make additional representations and thereafter for additional submissions by both the objector and acquiring authority. Thereafter, however, there is no fixed timetable or deadline within which the Secretary of State must make this decision. Anecdotally it sometimes

seems that written representation decisions join the queue awaiting an Inspector. Moreover, we understand from NPCU that its database does not include a filter to establish whether a case went to Public Inquiry or was dealt with by way of written representations, so it has not been possible to take that point further at this time.

- It would appear from the data in Figure 6 that there is considerable consistency in the time taken to determine unopposed CPOs. In broad terms this amounts to around 3 months for unopposed Planning CPOs and around 2 months for unopposed Housing CPOs (subject to the caveat above).
- However, opposed Planning and Housing CPOs, appear to be taking longer to determine. The most significant increase is in the time taken to determine Housing CPOs – a threefold increase in the time taken since the latest available figures in 2013.

Figures 7 and 8 further differentiate the time taken by the Secretary of State to determine CPOs.

Those CPOs referred back to the acquiring authority to be able to confirm are of course unopposed orders. These figures are, therefore, broadly consistent with the time taken to determine unopposed orders in Figure 6 above (which includes all unopposed orders).

Figure 7
Planning CPOs determined in days 2015 – 2016

	Confirmed (by Secretary of State) without modifications	Confirmed (by Secretary of State) with modifications	Referred to Acquiring Authority for confirmation	Withdrawn	Not Confirmed	Overall Average
2015	325	265	49	179	397	189
2016	322	329	235	133	477	304

Planning and Housing CPOs submitted 2003 – 2016 by region

Figures 9 and 10 provide an overview of Planning and Housing CPOs submitted 2003 – 2016 by region.

As indicated in our previous reports the greatest use of planning compulsory purchase powers has been in the North West and London followed by the West Midlands.

Housing CPO usage follows a similar pattern, with the North West and London regions again leading the way. The West Midlands as well as the Yorkshire and Humberside regions have also made significant numbers of Housing CPOs.

However, within the regional totals there are very significant variations between local authorities. A full list of all of those local authorities that have submitted Planning and Housing CPOs included at Appendix J. From that data the following key points can be discerned:

- Many authorities have used their compulsory purchase powers but do so sparingly.
- A relatively small number of authorities account for a significant proportion of CPOs. This is particularly the case with Housing CPOs, with the distribution of Planning CPOs being somewhat more even.
- The total of CPOs submitted by Great Yarmouth is a little misleading since the Council's legal department promoted Orders on behalf of other authorities, but NPCU's records, particular in earlier years, lists CPOs under Great Yarmouth's name.
- CPO totals in the London region reflect a wider and more regular use of powers. Even against that background of broader usage the programme of Housing CPOs made by Newham stands out.
- In the North West, as previously reported, the extensive use of housing compulsory purchase powers by Burnley and Wigan Councils, and of planning compulsory purchase powers by Liverpool and Manchester City Councils respectively, contribute significantly to the results.
- In the West Midlands, Birmingham and Wolverhampton Councils have made substantial numbers of Housing CPOs, with the former also making 19 Planning CPOs.

Figure 8
Housing CPOs determined in days 2015 – 2016

	Confirmed (by Secretary of State) without modifications	Confirmed (by Secretary of State) with modifications	Referred to Acquiring Authority for confirmation	Withdrawn	Not Confirmed	Overall Average
2015	347	66	65	367	400	170
2016	286	181	79	169	359	156

Figure 9
Planning CPOs submitted 2003 – 2016 by region

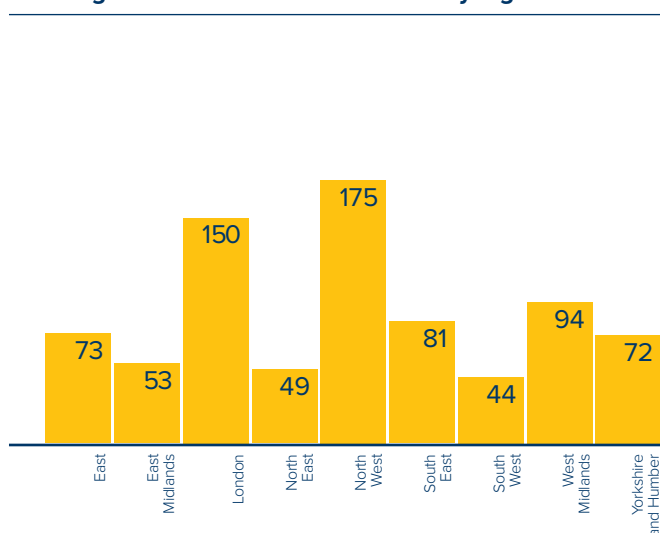
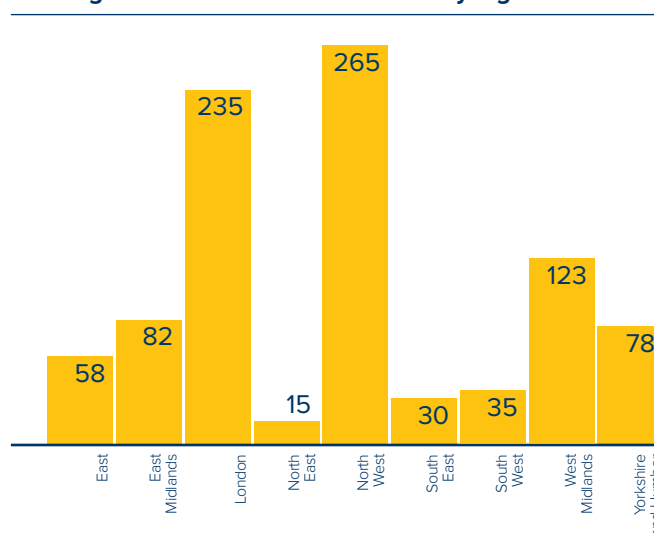


Figure 10
Housing CPOs submitted 2003 – 2016 by region



Why do CPOs fail?

Why do CPOs fail?

Housing CPOs not confirmed 2015 and 2016

Five housing CPOs were not confirmed by the Secretary of State. Each was determined pursuant to the written representations process.

The key reasons why the CPOs were not confirmed include:

- Nature of vacancy within the property as against extent of actual use of the property.
- Individual circumstances of the owner.
- Degree of harm caused by Order Lands insufficient to warrant confirmation.
- Engagement of PSED and ECHR – failure to accommodate disabilities.
- Failure to show that the use of CPO was a “last resort”.
- Undertaking not fulfilled by the owner but sufficient work undertaken.

Planning CPOs not confirmed 2015 and 2016

Five planning CPOs were not confirmed by the Secretary of State. Three were determined following public inquiries and the other was determined pursuant to the written representations process.

The key reasons why the CPOs were not confirmed and issues involved include:

- Conflict with Ministerial Statement.
- Failure to assess alternative schemes.
- No longer any need for confirmed order.
- Late attempt to change purpose of order.
- Owner’s recent limited improvements.
- Lack of detail in Council case as to compliance with Guidance (including failure to assess alternatives).
- Planning permission not conclusive of need.
- Where case finely balanced - “benefit of doubt” to objector.

In relation to the Shepherd’s Bush Scheme, the CPO was originally confirmed despite a recommendation from the Inspector that it should not be. Concerns had been raised about the guarantees and financial safeguards for the special character of the market and the market traders. There was also an impact on ethnic diversity to be addressed. The CPO was confirmed and in August 2015 the challenge to its confirmation was dismissed. However on appeal to the Court of Appeal the CPO was quashed for a lack of reasoning as to why the Secretary of State disagreed with the Inspector.

This report was prepared by Frank Orr with assistance from Jonathan Bower, Antonia Murillo, Kate Ashworth, Rachel Sykes and Aphrodite Christodoulou.

Summary

The year 2016 saw one of the most high profile CPO decisions of this decade: Aylesbury. The Aylesbury Estate has been subject to regeneration plans for years. The previous two CPOs had been confirmed, however the Secretary of State in September 2016, controversially refused to confirm the third CPO for the Aylesbury Estate. This was due to concerns about the way Southwark were dealing with leaseholders. It was felt the offers being made would not only deprive leaseholders of their dwelling but also their financial security, as they would have to invest significant personal resources to remain in the area. This ruling had the potential to establish a new point of principle: compulsory purchase may force people out of their homes, but not out of their

communities. But the decision was challenged by Southwark due to the serious impact the decision could have on regeneration projects, especially in London. The Secretary of State consented to judgment, the decision has now been quashed and a new public inquiry is imminent. This case demonstrated a shift in the Secretary of State’s approach to the public sector equality duty, albeit short lived. Compulsory purchase professionals will no doubt be following the second public inquiry closely.

Overall, it appears Planning and Housing CPO decisions not to confirm are fact specific and therefore it is difficult to see or predict the direction of travel regarding reasons not to confirm, although there are some usual suspects: lack of evidence; no

compelling case made; and the public sector equality duty not being properly considered. But one point of note: Inspectors do seem to give the benefit of the doubt to landowners where works are underway or promised for both Housing and Planning CPOs, especially if works have been carried out at the time of the site visit.

As regards the CPO process, the evidence suggests that proceeding by written representations is no guarantee to a speedy decision nor does it appear to be faster than proceeding by way of public inquiry.

Key Contacts

Jonathan Bower
Partner

T: +44 (0)117 989 6863
E: jonathan.bower@
wbd-uk.com



Antonia Murillo
Associate

T: +44 (0)191 279 9024
E: antonia.murillo@
wbd-uk.com



Jocelyn Denton
Legal Director

T: +44 (0)113 290 4419
E: jocelyn.denton@
wbd-uk.com



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