

**Decision Maker:** EXECUTIVE FOR PRE-DECISION SCRUTINY BY THE  
RENEWAL RECREATION AND HOUSING POLICY  
DEVELOPMENT AND SCRUTINY COMMITTEE ON 22  
JANUARY 2019

**Date:** Tues 22 January 2019  
Wed 13 February 2019

**Decision Type:** Non-Urgent Executive Key

**Title:** OPPORTUNITY SITE G – APPROVAL FOR IN PRINCIPLE USE  
OF COMPULSORY PURCHASE POWERS

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**Chief Officer:** Executive Director of Environment & Community Services

**Ward:** Bromley Town;

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## 1.0 Reason for report

- 1.1 The Executive approved on 8th February 2017 the selection of Countryside Properties (UK) Ltd (“Countryside”) as the preferred development partner for the first phase of development of Opportunity Site G following a competitive procurement process(‘the Scheme’). The Executive on 17th July 2017 approved the detailed terms of the development agreement and lease for the development and on the 11<sup>th</sup> December 2017 Full Council approved the allocation of £24.3m for the purpose of acquiring properties within the red line area of Phase 1 of Opportunity Site G. To date, the Council has been in negotiations with land owners to aquire properties that are required to deliver the Scheme.
- 1.2 It is now recommended that the Executive agrees, in principle, to the use of the Council’s compulsory purchase powers to facilitate the delivery of the Scheme. This provides certainty and allows preliminary processes required for the making of a Compulsory Purchase Order (CPO) to be carried out at the same time as negotiations with landowners are ongoing, saving both time and supporting the negotiating process. Executive authority will still need to be sought in the future to make a compulsory purchase order to acquire any property interest that is required for the Scheme that cannot be secured via negotiated settlement.

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## 2.0 RECOMMENDATION(S)

- 2.1 The PDS Committee is requested to scrutinise the proposed decision by the Executive and the Executive is recommended to:
- 2.2 Agree in principle to use compulsory purchase powers pursuant to section 226 of the Town and Country Planning Act 1990 (as amended)to acquire the land and new rights within the area described in the report and shown on the plan attached to this report, the Council being of the

view that compulsory acquisition of the land may be necessary in order to secure the delivery of the Scheme;

- 2.3. Authorise Officers to begin preparatory work to use its compulsory purchase powers, including, subject to the 'in-principle' decision being made, serving requisitions on land owners and appointing land referencing agents to thoroughly investigate all land interests, the preparation of a Statement of Reasons and all other necessary documentation.
- 2.4. Note that, subject to officers using all reasonable endeavours to assemble the land by agreement / private treaty, a further detailed report and a Statement of Reasons will come forward to Members of the Executive in due course setting out the justification for the making of a compulsory purchase order.

#### Impact on Vulnerable Adults and Children

1. Summary of Impact: An Equalities Impact Assessment will be undertaken which will include the assessment of the impact of the CPO on vulnerable adults and children and any necessary mitigation strategy considered. The result of any assessment would be presented to the Executive when seeking authorisation to make a CPO.
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#### Corporate Policy

1. Policy Status: Existing Policy:
  2. BBB Priority: Quality Environment Vibrant, Thriving Town Centres Regeneration:
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#### Financial

1. Cost of proposal: Overall cost of the scheme is estimated to be £24.3m
  2. Ongoing costs: Non-Recurring Cost:
  3. Budget head/performance centre: Capital Programme
  4. Total current budget for this head: £24.3m
  5. Source of funding: Growth Fund, S016 PIL, capital receipts, internal borrowing, and external borrowing where required
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#### Personnel

1. Number of staff (current and additional): 5
  2. If from existing staff resources, number of staff hours:
- 

#### Legal

1. Legal Requirement: Statutory Requirement :
  2. Call-in: Applicable:
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## Procurement

1. The Greater London Authority's London Development Panel (OJEU Notice 2012/S 69-113942) was used to select the preferred development partner. Solicitors, Bevan Brittan were appointed following a competitive quotation exercise through the EM Lawshare Framework to act as legal advisors for the CPO.
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## Customer Impact

1. Estimated number of users/beneficiaries (current and projected): N/A
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## Ward Councillor Views

1. Have Ward Councillors been asked for comments? Yes

Summary of Ward Councillor's comments: Ward Councillors have met with representatives of Countryside Properties and it has been agreed there will be regular meetings held throughout the process.

### **3. COMMENTARY**

- 3.1 The Executive on 17<sup>th</sup> July 2017 approved the detailed terms of the development agreement and lease for the Scheme and on 11<sup>th</sup> December 2017, Full Council approved an allocation of £24.3m to the capital programme for the purpose of acquiring properties within the red line area of Phase 1 of Opportunity Site G, henceforth referred to as the “Order Land” in this report and attached as Appendix 1. The Council’s development team which includes development advisors Montagu Evans, continue to liaise directly with property owners within the development site to exercise the Council’s Duty of Care to residents directly impacted by the proposed redevelopment. Progress continues to be made on site acquisitions and relocations with a total of six residential properties in Ethelbert Close purchased to date.
- 3.2 In accordance with the terms of the development agreement Countryside Properties submitted the planning application for the Scheme and which is currently under consideration by the Council’s Development Management team. It is envisaged that use of the Council’s powers to acquire land by a Compulsory Purchase Order (CPO) may be required in order to assemble all of the land interests and rights required to develop the Scheme in a timely manner. Therefore Executive authority is sought for an ‘In Principle’ decision to begin preparatory and planning work to use its compulsory purchase powers for all the land interests not yet in the ownership or control of the Council needed to facilitate the Scheme.
- 3.3 Subject to approval, it should be noted that the seeking of authority to pass a resolution to make and serve the detailed CPO will be made in a separate future decision by the Executive only once the following conditions have been reached:
- i. That Countryside has obtained planning permission for the development of Churchill Quarter.
  - ii. Comprehensive discussions have been carried out with all affected landowners with a view to acquiring the land or rights required by agreement.
  - iii. A Statement of Reasons setting out the justification for the CPO has been prepared and the Council is satisfied it meets all the statutory tests and complies with the Guidance (defined below).

#### **Land which is the subject of the CPO**

- 3.4 The land which would be potentially included in the CPO (“the Order Land”) is as follows:
- An area of approximately 1.26h hectares, comprised of:
    - 40 2-storey maisonettes on Ethelbert Close
    - Three commercial units at Bromley High Street
    - Bromley Town Church
    - Churchill Way

Part of the Order Land is owned by the Council, particularly being the six units which have been acquired by negotiation. It is considered prudent to include the entire area of land required for the Scheme within the CPO, so that any private express or implied rights, covenants or other

interests that may have been granted, entered into or acquired over the Order Land can be determined.

- 3.5 The other interests to be acquired include those of leaseholders, freeholders, and any private express or implied rights that may have been granted over the Order Land. These interests will be formally identified following completion of the land referencing process. Further ancillary parcels of land adjoining or neighbouring the Order Land might need to be included in the Order if discovered by due diligence to be required for the Scheme.

### **Development Programme**

- 3.6 In terms of the lease conditions the Council cannot make a stopping up order or compulsory purchase order until Countryside has obtained planning permission. The following development programme has been prepared based on the date of Countryside's submission of the planning application for the Scheme in May 2018 and illustrates the estimated length of each stage in the process.

- Exchange Development Agreement Sep 17
- Public Planning Consultation on Countryside Scheme Nov 17
- Executive Approval of Scheme Mar 2018
- Countryside's Submission of the Planning Application May 2018
- Prepare Compulsory Purchase Order documentation Feb 2019
- Secure Planning Consent Feb 2019
- Make Compulsory Purchase Order Summer 2019\*
- Compulsory Purchase Inquiry Winter 2019
- CPO Implemented Autumn 2020
- Commence Development Autumn 2021
- Completion Longstop date Spring 2025

\*An indicative timeline and breakdown of the Compulsory Purchase process is attached as Appendix 2.

### **Proposal and Options**

- 3.7 The proposal is to recommend that the Council agrees, in principle, to use its compulsory purchase powers to facilitate the Scheme. This provides robustness to the case for the making of the CPO and allows preliminary processes required for the making of a CPO to be carried out at the same time as negotiations with landowners are ongoing both saving time and supporting the negotiating process.
- 3.8 Members should note that agreeing in principle to use compulsory purchase powers in relation to the red line area will not undermine due process of pursuing negotiation and fair acquisition terms for existing land owners. In fact, the approach of seeking a resolution in principle to use CPO powers whilst continuing to try to negotiate acquisitions by private treaty agreement is in line with guidance published by the Department for Communities and Local Government in October 2015 entitled "Compulsory Purchase and the Crichel Down Rules" (the Guidance), which provides best practice advice for assembling land for schemes of this nature. It is considered that a resolution in principle to use compulsory purchase powers would facilitate negotiations because landowners would know that the Council genuinely means to progress the Scheme and if terms to acquire all land interests and new rights by agreement could not be achieved in a reasonable timescale, compulsory purchase powers will be used. This would encourage landowners to negotiate in a meaningful way.

- 3.9 Any decision to proceed with the making of a CPO would be contingent on a compelling case having been assembled in support of the need to make a CPO for the Scheme and the specific land or rights to be acquired, and for all the financial, legal and planning conditions having been satisfied. A full report to the Executive would provide these details when recommending that the CPO is made and implemented.

### **Use of CPO Powers**

- 3.10 The use of compulsory purchase powers requires a compelling case in the public interest to be made. Therefore, this report will explain the context and justification for recommending that the Executive agree to an 'in principle' to use such powers in this case.
- 3.11 In order to compulsorily acquire land the Council must have a relevant statutory power that authorises such acquisition. In addition the Council must use the most specific and appropriate power available to it. In the case of a CPO in connection with the Scheme the Council's planning powers under section 226 of the Town and Country Planning Act 1990 (the Act) are the most appropriate, as the Scheme would make a major positive contribution to the economic, social and environmental well-being of the area. At the time of making the CPO it would need to be ensured that the proposal meets with the requirements of this statutory power.
- 3.12 Detailed advice to acquiring authorities on the use of compulsory purchase powers is set out in the Guidance. The Guidance provides helpful information on the matters which the Secretary of State will take into account when considering whether or not to confirm a CPO, so should be fully considered by Members now in relation to the 'in principle' use of its compulsory purchase powers and later with reference to the making and implementing of the CPO that may be considered in future. These matters as they relate to the Scheme are considered below.
- 3.13 The Guidance states that in considering whether or not to confirm a CPO, the Secretary of State will have regard to the extent to which the purpose for which the land is being acquired fits with the adopted Local Plan for the area or, where no such up to date Local Plan exists, with the draft Local Plan and National Planning Policy Framework. Following the adoption of the Council's Local Plan in January 2019, the Scheme lies within Site 10 which is a key housing allocation in the Local Plan and will be crucial for the delivery of housing in the Borough during the Plan period.
- 3.14 The Guidance states that the Council must demonstrate a 'compelling case in the public interest', and that the public benefits that will arise from the purpose for which the land is to be acquired (i.e the Scheme) outweigh the impact on those affected. The Council must demonstrate both the need for the Scheme in principle and in general and the need to acquire each and every parcel of land included in the CPO. On the basis of the legal advice and the Guidance, officers are of the view that such a compelling case can be demonstrated from the desirability of implementing the scheme – in particular from the following substantial wider benefits resulting from it:
- i. up to 410 high quality new homes with a range of tenure and sizes including 35% affordable housing units;
  - ii. transformation of part of the High Street to include improving the townscape and access to the Church House Gardens and Bromley Park;
  - iii. net gain of public open space of 341.5 sq m (from 73,805.7 sq m to 74,147.2 sq m);
  - iv. generate over 40 FTE new jobs in the new business floorspace which will meet the needs of small, new start-up and creative businesses within the town centre;
  - v. reprovide an increased quantum of community floorspace from that currently exists within the Order Scheme 1400 sq m as opposed to 750 sq m;

- vi. generate during the construction phase of the development approximately 60 full time jobs; and the regeneration of part of Bromley town centre through optimising the use of an under-utilised brownfield site and enhancing the local economy

- 3.15 Part of the justification for obtaining confirmation of a CPO would involve demonstrating that compulsory powers are necessary because the land required cannot be acquired by agreement. Compulsory purchase is seen as a last resort and the acquiring authority must be able to show that it has made genuine attempts to acquire the land by negotiation. The Council has made significant efforts to acquire all interest by voluntary agreement and this can be thoroughly evidenced. The Guidance expects that the Council will be required to continue those efforts and detailed evidence of those further efforts should be available prior to the making of a CPO.
- 3.16 The Council must also demonstrate that there are no other impediments to proceeding with the Scheme, for example the need for planning permission, other consents or physical constraints. The planning application in relation to Churchill Quarter is still pending determination, due in February 2019. The Order Land is the subject of allocations in the Bromley Town Centre Area Action Plan(2010) and the emerging Local Plan(2019), and accordingly it benefits from policy support for the Scheme's proposed redevelopment.
- 3.17 The Council would have to demonstrate that it has, or at least will obtain, the resources necessary not only to pay compensation for the land but also to implement the Scheme: paragraph 14 of the Guidance. The reason for this requirement is to avoid a situation in which private land has been acquired compulsorily for a purpose which, in the event, cannot be achieved for lack of funds. On 11 December 2017 Council approved the allocation of £24.3m to the capital programme for the Council's outlay in terms of purchasing the Compulsory Purchase Order Land. The full cost of acquisition will be funded from the premium Countryside will pay the Council for the site as part of the development agreement which sets out the assurances that Countryside have the financial capacity to implement the scheme.

### Guidance summary

- 3.18 The Guidance sets out key tests which need to be satisfied before a Compulsory Purchase Order can be confirmed. These tests include:

Guidance requirement	Council's initial response
A compelling case in the public interest to acquire the Land which may interfere with owners human rights	The purposes for which the CPO would be made justify interfering with the human rights of those with an interest in the land affected; particularly the Order Land is suitable for and will facilitate the carrying out of development, redevelopment or improvement and will make a positive contribution to the promotion of the economic, social and environmental well-being of the locality. The Council has taken reasonable steps to acquire all of the land and rights required for the Scheme by agreement. Further justification is found in this report above and will follow the "in principle" resolution.
A comprehensive justification of why the Order is required	
There are no planning or other impediments to prevent the scheme from happening within a reasonable timescale	Planning permission has not been granted for the proposed Scheme, but the Scheme does benefit from strong policy support and there is no obvious reason why permission will not be granted. There are no other material planning or other impediments.
The financial viability of the scheme is such that it can be delivered within a reasonable timescale. This can include resources to acquire land as	Full Council approved the allocation of £24.3m to the capital programme for the Council's outlay in terms of purchasing the Order Land. The full cost of acquisition will be funded from the premium Countryside will pay the Council for the site as part of

well as develop the scheme.	the development agreement which provides assurances that Countryside have the financial capacity to implement the scheme.
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## Consultations

- 3.19 The planning applications in relation to the redevelopment of Churchill Quarter have been subject to statutory consultation throughout the planning application process, with responses received from a number of individuals, groups and bodies including the Greater London Authority, Transport for London, Historic England, numerous resident groups and various stakeholders. In addition Countryside have undertaken a significant programme of community engagement in relation to their planning application.
- 3.20 A CPO made following this resolution in principle would be subject to statutory consultation procedures which will include adverts in newspapers and site notices. This will give additional opportunity for any persons affected by a CPO, to become aware of the CPO and have the opportunity to make objections.

## CPO Land Referencing

- 3.21 The CPO will include all occupiers and all interests that are included within the red and blue line area identified on the map of the Order Land (Appendix 1) or have, or are believed to have, any interest over that land including adjoining owners. All owners and occupiers, including tenants, will be written to as part of the land referencing process that precedes the making of the CPO, and all relevant names and addresses will be included in the final CPO. In order to collate this information, it is intended that, subject to the recommendations being agreed, that land referencing commences at the earliest possible date. This land referencing will be undertaken by an external agent who specialises in land referencing exercises.

## Resource Implications

- 3.22 At this stage, the Council is being asked to only make an “in principle” decision to use its’ powers. A full detailed assessment of the financial implications and costs of making CPO will be prepared and presented to the Executive in a further report should a CPO actually be required.
- 3.23 The work required to prepare for the use of CPO powers, including all work needed to support the making of such an order will be managed and coordinated by Council officers. The Council would continue to employ the services of Montague Evans as development advisors and Bevan Brittan as legal advisors. The Council is looking to appoint a land referencing agent to carry out detailed examination of all the legal interests that affect the land within the Scheme.. Work that is required before making a CPO includes serving the ‘requisition’ notices on land owners to gather information about their land interests on the Council’s behalf, working on the case for CPO and preparing the Statement of Reasons to support the making of the Order and drafting the Order itself.
- 3.24 In basic summary, under a CPO, property or rights are acquired at open market value but disregarding any increase (or decrease) in value attributable to the Scheme for which the land is acquired. Affected parties may also be entitled to other compensation for loss payments and disturbance depending on circumstances. The Council will be responsible for paying all compensation to landowners, whether payable by purchases through voluntary negotiation or through the CPO process.
- 3.25 There is a possibility that blight claims could be made by affected landowners that require the Council to acquire their land in advance of the compulsory purchase process taking effect, but such claims would not be valid prior to the making of any CPO. This risk will be considered



further in any further detailed report that comes forward to Members of the Executive seeking authority to make the CPO.

- 3.26 Looking beyond an 'in principle' agreement, a prerequisite to any resolution of Council to acquire land by CPO, will be considered further together with updated details of the financial risks and exposure to the Council, which will be presented to the Executive for approval should a full CPO resolution be required.

### **Equalities Impact Assessment**

- 3.27 Section 149 of the Equalities Act 2010 created the public sector equality duty. Section 149 states:-

- (1) A public authority must, in the exercise of its functions, have due regard to the need to:
  - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it

- 3.28 Officers have taken this into account in the assessment of the case for making a CPO and Members must be mindful of this duty when considering the recommendations in this report. As part of the CPO preparation work an Equalities Impact Assessment will be undertaken on the potential impact of the proposal and any necessary mitigation strategy. The result of any assessment would be presented to the Executive when seeking authorisation to make a CPO.

### **Human Rights and the Case for Compulsory Acquisition**

- 3.29 The Human Rights Act 1998 places direct obligations on public bodies such as the Council to demonstrate that the use of compulsory purchase powers is in the public interest and that the use of such powers is proportionate to the ends being pursued.
- 3.30 When the Council decides to make a CPO, the Council will need to be sure that the purpose for which the land is required sufficiently justifies (or can be sufficiently justified in due course) interfering with the human rights of those with an interest in the land affected. It is acknowledged that the compulsory acquisition of the land in the red line area may amount to an interference with the human rights of those with an interest in the land. These include rights under Article 1 of the First Protocol of the European Convention on Human Rights (ECHR) (which provides that every natural or legal person is entitled to peaceful enjoyment of his possessions) and Article 8 of the ECHR (which provides that everyone has the right to respect for his private and family life, his home and his correspondence).
- 3.31 When preparing the case for making a CPO, officers will keep in mind and in due course advise Members about the need to balance the public interest and the individual's rights and that any interference with these rights will be necessary and proportionate. "Proportionate" in this context means that the interference must be no more than is necessary to achieve the identified legitimate aim. As part of the investigations that will be undertaken ahead of making any CPO, there will be an investigation into the effect on landowners and leaseholders of the CPO, and this will be fully taken into account before a final decision is made as to whether or not to put forward a resolution for the making of a CPO.
- 3.32 Members are advised that on the basis of the information that is available to officers at present, that officers are of the view that there is likely to be a compelling case in the public interest for

compulsory acquisition of the various interests within the Order Land if they cannot be acquired by agreement. Therefore, the use of compulsory purchase powers in this case is likely to be proportionate. Without the use of these powers, the much-needed regeneration and redevelopment of the land may not be achievable. Appropriate compensation will be available to those entitled to claim it under the relevant statutory provisions. Members are advised that the land is both suitable for and will facilitate the carrying out of development, redevelopment or improvement and will make a positive contribution to the promotion of the economic, social and environmental well-being of the area.

#### 4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

- 4.1 As stated in 3.28 above, an Equalities Impact Assessment will be undertaken on the potential impact of the proposal as part of the CPO. This will include the assessment of the impact of the CPO on vulnerable adults and children and any necessary mitigation strategy considered. The result of any assessment would be presented to the Executive when seeking authorisation to make a CPO.

#### 5. POLICY IMPLICATIONS

- 5.1 It is important to recall the reasons for bringing forward the Area Action Plan for Bromley Town Centre. One of the main objectives is the provision of residential capacity through mixed use developments. As acknowledged in paragraph 5.7.4 of the AAP development of Opportunity Site G would be phased and the redline area comprises of Phase 1 of Opportunity Site G and Site 10 of the Local Plan.

#### 6. FINANCIAL IMPLICATIONS

- 6.1 This report is requesting that Executive agree in principle, to use it's compulsory purchase powers to facilitate the Site G development scheme. A full report would be brought back to the Executive to agree that the CPO is made and implemented.
- 6.2 The Executive on 7th November 2017 approved funding of £24.292m for the acquisition of properties required for the Scheme. This included £900k for the CPO Inquiry and professional /management fees. This is summarised in the table below:

<b>Estimated costs</b>	<b>£'000</b>
Market value of property interests	18,833
Disturbance payments inc reinvestment cost	1,493
Claimants' surveyors & legal fees	366
Statutory loss payments	1,276
Acquiring Authority's Stamp Duty Land Tax liability	484
Acquiring Authority's Professional Fees	315
Other rights	475
Contingency	150
<b>Total Property Cost Estimate</b>	<b>23,392</b>
CPO Inquiry and professional/mgt fees	900
<b>TOTAL APPROVED SCHEME COST</b>	<b>24,292</b>
<b>Financed by:</b>	
Contryside contribution	100
Growth Fund	2,900
S106 funding	360
Capital Financing	20,932
<b>TOTAL FINANCING</b>	<b>24,292</b>

- 6.3 To date £1.469m has been spent/committed on the acquisition of properties in Ethelbert Close leaving a balance of £22.822m.
- 6.4 Within the £24.292m was a sum of £1.1m allocated for specialist development consultancy for the CPO related costs, inclusive of all professional fees, legal and development consultancy and internal management costs. This sum includes the £200k previously allocated from the growth fund. To date £114k has been spent/committed, leaving a balance of £986k. Details of the funding for the scheme and the estimated capital receipts were reported to Executive on 7<sup>th</sup> November 2017.

## **7. PERSONNEL IMPLICATIONS**

- 7.1 None for the purposes of this report.

## **8. LEGAL IMPLICATIONS**

- 8.1. The Council is empowered under section 226(1)(a) of the Town and Country Planning Act 1990 as amended, to acquire any land in its area if it is satisfied that the proposed acquisition will facilitate the carrying out of development, redevelopment or improvement on or in relation to the land. The Council may utilise its compulsory purchase powers under section 226 of the TCPA

(a) if it thinks the acquisition will facilitate the carrying out of development, or redevelopment or improvement on, or in relation to the land or

(b) which is required for a purpose which is necessary to achieve in the interests of the proper planning of an area in which the land is situated.

In order to make an acquisition under (a), the Council must also consider that the development, redevelopment or improvement will contribute to the promotion or improvement of the economic social or environmental well-being of its area.

- 8.2 In this case the proposal is to seek in-principle approval to make a CPO for the purpose of facilitating the comprehensive redevelopment of the Order Land to enable the delivery of the Scheme, which includes up to 410 residential units and a mix of other uses. The Scheme is overall considered to make a major positive contribution to the economic, social and environmental well-being of the area.
- 8.2. Section 226(3) of the Act confirms that the Council's CPO powers extend to lands adjoining land which is required for the purpose of executing works for facilitating the development or use of the primary land. This is relevant to interests required, such as crane over-sailing rights, which fall outside of the planning application boundary.
- 8.3. The Acquisition of Land Act 1981 governs the procedures which apply to such an acquisition. The Compulsory Purchase Act 1965 governs post-confirmation procedures and the Land Compensation Act 1961 governs the amount and assessment of compensation. The Local Government (Miscellaneous Provisions) Act 1976 governs the granting of new rights. Further implications relating to requirements of the Guidance are as set out in paragraphs 3.9 to 3.16 of this report and would need to be considered by the Executive in detail at the time of making a CPO. The Human Rights and equalities aspects of a CPO are reviewed at paragraphs 3.22 to 3.37 inclusive.
- 8.4 Detailed legal implications would need to be assessed when consideration is given to making a CPO. There will be significant legal implications in delivering a project of this complexity over a number of critical areas. The Council has therefore appointed Solicitors Bevan Brittan under the EM Lawshare Framework to act as the legal advisors for the CPO. Bevan Brittan will provide the level of expertise and guidance on a range of key areas for the programme. Such areas

include planning, CPO law and procedure and developer agreements. The Council, does not have sufficient in-house resources to support a large scale programme of this magnitude and hence the appointment of Bevan Brittan will ensure the Council has the benefit of comprehensive legal advice through a single provider for all the elements of the Scheme. The Council's renewal team and legal department are providing a client side role in the delivery of the programme.

## 9 PROCUREMENT IMPLICATIONS

9.1 None for the purposes of this report.

<b>Non-Applicable Sections:</b>	PERSONNEL IMPLICATIONS, PROCUREMENT IMPLICATIONS
Background Documents: (Access via Contact Officer)	