
CPO Report to the Secretary of State for Communities and Local Government

by Peter Rose BA MRTPI DMS MCMI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 15 November 2016

The Town and Country Planning Act 1990

The Local Government (Miscellaneous Provisions) Act 1976

The Acquisition of Land Act 1981

Application by Warrington Borough Council for confirmation of:

The Warrington Borough Council (Bridge Street Quarter)
Compulsory Purchase Order 2015

Inquiry held on 20 September 2016, closing on 4 October 2016
Inspections were carried out on 20 September 2016
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File Ref: APP/NPCU/CPO/M0655/75931

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- The Compulsory Purchase Order was made under section 226(1)(a) and section 226(3)(a) of the Town and Country Planning Act 1990, and under the Local Government (Miscellaneous Provisions) Act 1976 and the Acquisition of Land Act 1981 by Warrington Borough Council on 13 August 2015.
- The purposes of the Order are to facilitate the carrying out of development, re-development or improvement on, or in relation to, land within the Bridge Street Quarter of Warrington.
- There are no outstanding grounds of objection.
- When the Inquiry opened there was one remaining qualified objection which was subsequently withdrawn before the Inquiry was closed. Four other qualifying objections were previously withdrawn and no late objections were lodged. There were no non-qualifying objections.

Summary of Recommendation:
That the Order be confirmed with modifications

Procedural matters and statutory formalities

1. The Warrington Borough Council (Bridge Street Quarter) Compulsory Purchase Order 2015 (the Order) relates to land and premises within Warrington Town Centre (the Order Land).
2. Notices of the making of the Order were published in the Warrington Guardian on 27 August 2015 and on 3 September 2015. Notice was served on all persons having a known interest in the Order Land, together with a copy of the Order, the Order Map and its accompanying Statement of Reasons. Notices were posted on site in respect of plots of land in unknown ownership and in respect of the Order generally.
3. Public notice of the Inquiry was given on 14 April 2016.
4. The Inquiry was held on 20 September 2016, and I carried out an accompanied visit to the site and surrounding area on the same day. I also undertook a preliminary, unaccompanied visit the previous day.
5. At the Inquiry it was confirmed by the Council that all of the statutory formalities in relation to the Order and the Inquiry had been met, and there were no points arising in regard to any specific legal or procedural matters.
6. At the opening of the Inquiry there was one remaining objection to the Order, by Stonegate Pub Company Limited. This related to land and buildings at 65 Bridge Street, WA1 2HB (Plot Ref: Nos 14, 15, 17, 59 and 60). The Inquiry heard that an agreement had been reached between the Council and the objector and that arrangements were in place for that withdrawal to be formalised. Notwithstanding the Council's expectation of an imminent withdrawal, the objection had not been formally withdrawn at that time and relevant evidence was presented by the Council. The Inquiry was then adjourned on 20 September, following consideration of all other evidence, to afford the parties an opportunity to conclude arrangements for withdrawal. By letter dated 29 September 2016, the objection was subsequently withdrawn. The Inquiry was then closed in writing on 4 October 2016 with no outstanding objections for consideration.

7. An accompanying Stopping Up Order has also been made which was not part of the Inquiry and is not subject to this report.
8. I consider the Order on the above terms.

The Order Land and surroundings

9. The Order Land comprises approximately 1.432 hectares of land within the Bridge Street Quarter (the BSQ) of Warrington Town Centre. It is broadly enclosed by Horrocks Lane to the north, by Bridge Street to the west, by Academy Way to the south, and by Bank Street to the east. The Order Land also includes a small parcel of land around a gas governor to the west of Academy Street (Plot Ref: No 36).
10. The Order Land relates to part of the commercial heart of Warrington Town Centre. This is an area of mixed use and includes retail and other commercial premises and an indoor market. The townscape comprises buildings of contrasting form and style, including listed buildings. Part of the Order Land also lies within Bridge Street Conservation Area, and the Buttermarket Street Conservation Area is also nearby. The surrounding area is predominantly commercial in character with little residential use evident.
11. The Order Land forms part of Masterphase 1 of the Council's proposals for the Bridge Street area. Masterphase 1 relates to that part of the Bridge Street area north of Academy Way and the site of the former multi-storey car park to the south. Masterphase 2 relates to further land to the south of Academy Way, is identified by the Council for potential future development but is not part of the Order subject to this report.

Background to the Order

12. Masterphase 1 comprises three phases:
 - Phase 1 involves demolition of Time Square Shopping Precinct. This is completed and the land already falls within the Council's control;
 - Phase 2 comprises other land within the Council's control where works are also underway, including construction of a temporary indoor market;
 - Phase 3 relates to the Order Land.
13. The proposals for Masterphase 1 effectively comprise 'the Scheme' and the Order would allow the Council to deliver Phase 3.
14. In summary, the Scheme would include new temporary market accommodation as an interim arrangement pending construction of the market's new permanent home as part of the development; a new cinema; leisure and retail units; new Council offices to include accommodation for direct, public-facing Council services as well as for back-office staff; further areas of public realm, including a new public square with pedestrian links to surrounding areas; replacement of the existing multi-storey car park; and associated highway works.

The Case for Warrington Borough Council

Background

15. The Order would enable the Council to assemble the land and rights within the red boundaries shown on the accompanying Order Map (the Map), and is considered necessary to facilitate development of a major town centre regeneration scheme.
16. BSQ is an important area of Warrington Town Centre but has been in decline for many years. The Council considers the redevelopment and renewal of the BSQ to be a high priority and an opportunity to deliver a new leisure, retail and civic quarter with significant wider economic and regeneration benefits for the whole of the town centre, and for the Borough of Warrington in general. Much of the BSQ Scheme land is already within the Council's control and various work has started on site, including demolition, and construction of the temporary market hall.
17. The Order Land forms just one element, although the key element, of a larger development site for the BSQ Scheme. It is seen as the key piece in the jigsaw that will allow the BSQ Scheme to come forward, and would secure the considerable inward investment to this part of Warrington that is intended to reverse problems of decline that have beset the area for many years.
18. The Order seeks to acquire the legal interests, including easements, the benefit of covenants, rent charges, and options in the land coloured pink (the Pink Land) on the Map, and new rights in the land coloured blue (the Blue Land) on the Map, as specified in the Schedule to the Order.

Justification for the Order

19. The long term decline in the retail/leisure function of the BSQ has been due to a number of factors. These include: the extension of the adjacent Golden Square shopping development in 2007; a consequent drop in retail footfall; the re-location of several key retailers into other parts of the town centre; the general economic recession dating from 2008; the effects of competition from alternative centres and out-of-town shopping; the rise of online shopping; and an increase in anti-social behaviour, and a vertical drinking culture, particularly in Bridge Street. Furthermore, various efforts by the Council over the years to arrest this decline have been unsuccessful.
20. There is a clear and pressing need to regenerate this area of the town centre. In so doing, the Scheme would achieve many of the Council's wider objectives in terms of: providing a new and much enhanced home for the indoor market; creating a step change in the town centre's leisure provision; providing new retail units; rationalising the Council's own accommodation and service provision within the town centre; and improving the townscape and general attractiveness of the area.
21. The power granted under section 226(1)(a) and section 226(3)(a) of the Town and Country Planning Act 1990 (the Act) is intended to assist a local authority to facilitate the carrying out of development, re-development or improvement in relation to the economic, social or environmental well-being of an area. Paragraph 76 of the Department for Communities and Local Government

Guidance on Compulsory purchase process and The Crichel Down Rules for the disposal of surplus land acquired by, or under the threat of compulsion, 2015 (the CP Guidance) lists the factors to be considered for the purposes of an Order made under section 226(1)(a). These are:

- (a) whether the purpose for which the land is being acquired fits in with the adopted Local Plan for the area;
- (b) the extent to which the proposed purpose will contribute to the achievement of the promotion or improvement of the economic, social or environmental well-being of an area, and;
- (c) whether the purpose for which the acquiring authority is proposing to acquire the land could be achieved by any other means.

22. The Council has addressed each in turn as below.

Alignment with planning policy

23. Reflecting relevant planning policy, the entire Scheme benefits from outline planning permission granted in December 2014. Furthermore, at the time of the Inquiry, all full planning and relevant listed building consents were in place to deliver the development in its entirety, save for the new retail units proposed along Dolmans Lane. The Inquiry heard that this outstanding element was the subject of a current application for full planning permission. At that time the application was due to be reported to the Council's relevant Committee on 28 September 2016, there had been no objections in response to publicity, and the recommendation was to be favourable. A similar outline permission had also been granted previously.

24. There are no planning impediments to the delivery of the Scheme.

Achieving economic, social and environmental well-being

25. As evidenced by the Council's extensive suite of Proofs, redevelopment of the Order Land is a crucial step in the substantial environmental, social and economic regeneration of the BSQ in particular, and of Warrington Town Centre in general.

Consideration of alternatives

26. The BSQ is an important area within the town centre. It is a highly accessible location but is in need of specific regeneration and renewal. This combination of factors means that it is the optimum location to accommodate the particular mixed use scheme proposed and there is no preferable, attractive or viable alternative location for the Scheme within Warrington Town Centre. The Scheme was designed to deliver a critical mass and mixture of uses in this particular location so as to bring about positive change to this specific part of the town centre.

27. The phasing requirements of the Scheme (and particularly in relation to keeping the indoor market open throughout the duration of the development) and the size and location of the individual elements of the development are important drivers for the land and rights to be acquired under the Order.

28. The Council carefully considered the extent of the Order Land in advance of its making. All elements of the Scheme are required to deliver a successful development that is both financially viable and sustainable in the long-term.

Efforts to acquire by agreement

29. In accordance with paragraph 16 of the CP Guidance, concerted efforts have been made since March 2013 to acquire the required interests in the Order Land by agreement. At the time of the Inquiry, these negotiations remained on-going.
30. The Council recognises, however, that it is unlikely that all the outstanding interests will be acquired by private agreement within the timetable required for the Scheme to proceed. The Order has been made in the event that continuing attempts to acquire by agreement fail.
31. To date a significant number of interests within the Order Land have been acquired by agreement and arrangements have also been reached with a number of landowners concerning new rights over land.
32. There are 62 plots within Table 1 of the Schedule to the Order. Within these 62 plots, the Council advises there are approximately 216 'plot interests' (counting each interest in each plot). Of these interests, the Council now has ownership of 48 'plot interests'. This leaves 168 plot interests, of which 42 plots are designated as Blue Land and the remaining 126 interests are designated as Pink Land. The market traders account for 97 of the 126 Pink Land interests. There are also 10 interests agreed where legal documentation is progressing, and 14 unknown ownerships. The authority advises that 17 Pink Land interests remain to be acquired, either by agreement or alternatively through the exercise of compulsory powers. These 17 Pink plots equate to 11 landowners, a number of landowners having interests in more than one plot. Although the 42 Blue plot interests (38 excluding Council and unknown ownerships) would not be disturbed from occupation, progress continues to formalise the grant of new rights required by the Council to facilitate the development of the Scheme.
33. What it is clear and unchallenged is that, subject to certain minor modifications (see below), it would be necessary for the Council to acquire all of the rights and interests included in the Order to facilitate the development of the BSQ Scheme.
34. The Council has made clear that powers conferred under the Order, if confirmed, would be used only as a last resort and negotiations with affected parties would continue for as long as possible in an attempt to secure private agreements for acquisition.

Modifications to the Order

35. The land interest in relation to 47-49 Bridge Street (Plot Ref: Nos 24 and 55) was acquired by the Council on 26 August 2016. As there are no other land interests or rights which need to be acquired in relation to these plots, the Council has confirmed the Order can be modified to remove references to Plot Ref: Nos 24 and 55.

Viability

36. The Council has engaged an experienced Development Partner, Muse Developments Ltd, to manage and support the Scheme, and has carefully considered the viability and funding of the development.
37. In response to previous obstacles in the market place, Muse Developments Ltd has taken the role of development manager on behalf of the authority, the Council role reverting to developer and landlord.
38. The Council has provided various evidence, including initial commitments from proposed operators and other submissions, indicating that sufficient market demand is present to support the scheme.
39. The Scheme would be funded through long-term Prudential Borrowing via the UK Treasury. The evidence of the Council's financial modelling is that there would be an Average Net Annual Surplus of some £0.7m, allowing for both costs of repayment of the principal amount and annual interest.

Council conclusions

40. There is no challenge to the Council's evidence and the authority considers that the Secretary of State may properly conclude that: there is a clear need for the BSQ Scheme and its individual elements; the Scheme is viable and fundable; the Order Land is fundamental to the delivery of the BSQ Scheme; and that the development will proceed if the Order is confirmed.
41. The Council's case is that it has discharged all legal requirements for the confirmation of the Order and has complied with the CP Guidance, and all objections have been withdrawn. For all the detailed reasons set out in its Statement of Case and Proofs of Evidence, the Council considers there is a compelling case in the public interest for confirmation of the Order.

Submissions supporting the Council

42. No separate submissions were made in respect of the Council's case.

Objections

43. Whilst objections to the Order were initially submitted, and evidence was considered at the Inquiry in relation to the objection by Stonegate Pub Company Limited, none remain outstanding for consideration as part of this report.

Inspector's conclusions

44. The conclusions set out below are framed around the three tests set out in paragraph 76 and other advice in the CP Guidance. This includes paragraph 2 which expects acquiring authorities to use compulsory purchase powers where it is expedient to do so and only where there is a compelling case in the public interest. Compulsory purchase is intended as a last resort to secure the assembly of all the land needed for the implementation of projects.
45. I also address further relevant matters as below.
46. My use of parentheses [] indicates reference to foregoing paragraphs above summarising the submitted evidence.

Alignment with planning policy

47. The Scheme has the benefit of planning permission and associated consents [23] and accords with the Warrington Borough Council Local Plan Core Strategy Adopted July 2014 (the Local Plan) in which Bridge Street/Time Square is identified as a Key Area of Change.
48. The Scheme has also evolved over time in conjunction with a series of broadly supportive strategic statements. These include: the Warrington Town Centre South Masterplan Framework Bridge Street Quarter Final Report August 2008; the Warrington Town Centre South Strategic Masterplan Framework Waterfront Final Report August 2008; the Bridge Street Area Supplementary Planning Document 2009; the Regeneration Framework for Warrington 2009; the Warrington Partnership Town Centre Area Plan 2010-2013; and the Warrington Health and Wellbeing Strategy 2015-18.
49. The Council's overall strategy is to generally support and promote comprehensive redevelopment and regeneration opportunities in the Bridge Street and Time Square area for mixed use proposals including leisure, retail, cinema and office uses. The Local Plan commits the Council to development in the town centre where, amongst other matters, a proposal supports viability and vitality, generates job growth, adds to the attractiveness of the office market, increases the diversity of uses, supports the town in its role as a regional transport gateway, and improves linkages to the rest of the Borough. It also seeks to look positively upon proposals that are designed to reinforce local distinctiveness and enhance the character, appearance and function of the street-scene, local area and wider townscape.
50. I further note that the Scheme has been advanced in conjunction with various associated stakeholder and community consultation, and been subject to supportive detailed external design reviews in conjunction with Historic England.
51. I also have regard to the National Planning Policy Framework (the Framework). A core principle of the Framework is for planning to proactively drive and support sustainable economic development in order to deliver, amongst other things, thriving local places. It further advises that the Government is committed to ensuring that planning does everything it can to support sustainable economic growth.
52. The Framework sets out specific commitments to ensuring the vitality of town centres, including the need to recognise town centres as the heart of communities and to pursue policies to support their viability and vitality. Other particular aims include a need to promote customer choice, to retain and enhance existing markets, and to allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres.
53. The Framework also makes clear that the purpose of the planning system is to contribute to the achievement of sustainable development. Sustainable development is defined by the Framework with reference to the policies in paragraphs 18 to 219 taken as a whole. The Framework further identifies economic, social and environmental dimensions to sustainable development. Given the overwhelming benefits of the Scheme [25] and little evidence before

me of significant adverse impacts arising, I am satisfied the Order contributes to a sustainable development consistent with the expectations of the Framework.

54. I therefore find the scheme clearly accords with relevant planning policies at both local and national level.

Achieving economic, social and environmental well-being

55. In economic terms I find there is little reason to doubt that the redevelopment would contribute towards the viability and vitality of the town centre [36, 38, 39]. Social benefits would result from the improvement of a relatively run-down area and from the range of new public facilities to be provided [14]. It would also bring about accompanying environmental improvement [20].
56. The Council considers the broad mix of uses proposed would create a large number and wide range of employment opportunities for residents of Warrington and would contribute positively towards the establishment of a more diverse local economy. The Council's evidence suggests this could involve in excess of 1,300 jobs.
57. In broadening the appeal of the town centre, the proposal includes a 13-screen, 2,500 seat cinema for which an operator has been selected, a range of family restaurants for which initial occupants have been identified, and a new public square as part of wider, high quality public realm proposals.
58. A very key feature of the Scheme is the replacement market hall. The existing market hall was constructed in the 1960s, but the origin of the market pre-dates that accommodation. Indeed, the market has considerable historic significance for the town centre, and for its function and overall character. Traders are seeking a main high street frontage and the proposed move would also facilitate retention of an element of the existing façade to Bridge Street which is listed. It would thereby further serve to reinforce the historic and cultural significance of the market as a special and integral part of Warrington's heritage.
59. A number of Grade II listed buildings would be retained, all of which would help to enhance the distinctiveness of the town centre and to conserve the significance of designated heritage assets consistent with the expectations of the Framework.
60. Redevelopment would provide less off-street parking than the maximum permitted by Council guidance and would strike a considered balance between developing the excellent accessibility credentials of the town centre and operators' needs for parking to serve the mixed use development. The development would occupy an existing accessible location already very well served by public transport. A comprehensive package of highway improvement measures is proposed, including some public transport enhancements. Improvements to the public realm will increase connectivity through the site and strengthen links to surrounding areas.
61. I therefore find the Order would make a very significant contribution to achieving economic, social and environmental well-being.

Consideration of alternatives

The Order Land forms a key part of a comprehensive development that has already commenced [12]. There is no challenge that the whole of the Order Land is required to facilitate this specific development and so progress and conclude the wider redevelopment scheme.

62. Appropriate efforts have been made by the Council in negotiations to acquire properties and rights [29] and a number of interests within the Order Land have been acquired by agreement [31].
63. I find there is no feasible alternative to the Order in unlocking the outstanding impediments to development and so delivering the specific benefits identified. This would follow in the wake of reasonable but unsuccessful efforts by the Council to acquire the Order Land by consent [29, 30].

Special kinds of land

64. The Order Land includes interests which have been acquired by statutory undertakers for the purposes of their undertaking. Section 16 of the Acquisition of Land Act 1981 (the 1981 Act) makes provision for statutory undertakers to make representation to the appropriate Minister and for an Order not to be confirmed unless he/she is satisfied that the land can be purchased and not replaced without serious detriment to the carrying on of the undertaking, or that it can be replaced without detriment.
65. A gas governor within the former Time Square surface car park owned by National Grid Plc would remain as part of the Scheme (Plot Ref: No 36), and National Grid Plc has a right of access to the facility across the car park.
66. The Order seeks to acquire interests in a line of access across the land surrounding the gas governor in order to implement landscaping within the Scheme, but the Council is committed to ensuring that a suitable access is retained for the benefit of National Grid Plc at all times. The Scheme also does not seek to have any built structures within a 3 metre distance of the governor.
67. Negotiations have been pursued with National Grid Plc to safeguard access to the gas governor throughout the construction period and post-development, and there is no objection to the Order from National Grid Plc.
68. National Grid Plc did object to an accompanying Stopping Up Order but this was not a matter before this Inquiry and, in any event, that objection was previously withdrawn.
69. The Order also seeks to acquire interests in electricity sub-stations and associated facilities owned by SP Manweb Plc (Plot Ref: Nos 45, 51 and 57). Demolition is required in order to facilitate development of the Council offices and leisure aspects of the Scheme, and at least one of the sub-stations has already been de-commissioned. An objection was received from SP Manweb Plc but, following formal agreement with the Council, the objection was withdrawn as addressed by email dated 30 August 2016.
70. As such, I find confirmation of the Order with regard to section 16(2) of the 1981 Act to be appropriate.

71. Plot Ref: No 42 also includes a legal interest by the Duchy of Lancaster in respect of mine and mineral rights. The Scheme does not encroach on such rights and the description for that plot in the Schedule specifically excludes Crown interests from the Order.

Human Rights

72. Confirmation of the Order would have potential implications for the rights of those with an interest in the Order Land by virtue of Article 8 and/or Article 1 of the First Protocol to the European Convention on Human Rights, as incorporated by the Human Rights Act 1998. Article 8 includes the right to respect for private and family life in which there shall be no interference by a public authority except as is in accordance with the law and as is necessary in a democratic society in the interests of, amongst other things, the economic well-being of the country. Article 1 of the First Protocol concerns the right to peaceful enjoyment of possessions, and requires that no-one shall be deprived of their possessions except in the public interest and in accordance with the law.

73. The Scheme would result in significant public benefits to the well-being of Warrington Town Centre and its surrounding area. Such benefits would be yielded through the social, economic and environmental dimensions of sustainable development. Overall, I find that the degree of interference with human rights in this instance would not be disproportionate to the considerable public benefits arising.

Summary of Inspector's conclusions

74. In terms of the three matters identified in paragraph 76 the CP Guidance, I have found that:

a) the purpose for which the land is being acquired fits in with the development plan [23, 24] (and is also consistent with the national expectations of the Framework);

b) the proposed purpose would contribute considerably to the promotion and improvement of the economic, social and environmental well-being of the town centre and surrounding area for the benefit of its occupiers and users [25], and;

c) the purpose for which the acquiring authority is proposing to acquire the land could not be achieved by any other means [26, 27, 28].

75. I have little reason to question the viability of the Scheme or to doubt its likely completion with the benefit of the Order [36, 37, 38, 39].

76. I have also found that the Order is in broad conformity with procedural and other legal requirements [5].

77. Given the scale and complexity of the Scheme, I also find the absence of objections to the Order, and of any challenges to the Council's evidence, to be a significant endorsement of its merits and of the underlying proposals.

78. The proposals involve an innovative development shaped by existing Council ownership and operator requirements, and respond to a clear and pressing need. The Scheme both maintains operation of the market throughout the duration of the works and draws upon the market's commercial and rich historic significance

for the future benefit of the town centre. The Scheme is supported by evidence of viability and will give rise to substantial economic, social and environmental benefits both for the town centre and for the Borough more generally. The Order has been carefully considered and is essential in unlocking key impediments otherwise thwarting delivery and realisation of such improvements to well-being.

79. I also observed first hand at my visit both the general physical need for improvement within the BSQ, and the considerable potential offered by the Order Land in contributing towards a thriving, rejuvenated town centre as proposed.
80. I find the Order is a necessary interference in human rights and strikes an appropriate balance between the public interest of achieving improvements and regeneration, and the private interests in the land. The public benefits would significantly outweigh the private loss and other impacts. Consequently there is a compelling case in the public interest for confirming the Order.
81. I conclude that confirmation of the Order would meet the tests of section 226(1)(a) of the Act, and would comply with the requirements set out in the CP Guidance.
82. I shall therefore recommend that the Order be confirmed, with the modifications to the Map referred to above.

Recommendation

83. I recommend that The Warrington Borough Council (Bridge Street Quarter) Compulsory Purchase Order 2015 be confirmed with the following modifications:
- a) deletion of references in relation to Nos 47-49 Bridge Street (Plot Ref: Nos 24 and 55 on the Order Map) which were acquired on 26 August 2016 and as identified in a bold red line edging and hatched green on the accompanying drawing Ref: PA-2533-CPO-SLIDER.

Peter Rose
INSPECTOR

APPEARANCES

For Warrington Borough Council:

Michael Humphries
of Queen's Counsel

Instructed by DWF LLP
(on behalf of Warrington Borough Council)

He called:

John Laverick

Development Service Manager, Warrington & Co

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Helen Kirkham

Associate Director, Bilfinger GVA

Gregory Dickson

Associate Director, Turley

DOCUMENTS

Documents initially submitted by Warrington Borough Council to the Inquiry:

1. Opening submissions by Michael Humphries QC
2. Compendium of documents relating to statutory publicity

Other documents subsequently submitted by the Council during the adjournment:

3. Further copy of sealed Order Schedule dated 13 August 2015
4. Copy of List Entry Summary relating to The Lion Hotel, Bridge Street
5. Copy of email from Charles Russell Speechlys LLP dated 29 September 2016 on behalf of Stonegate Pub Company Limited enclosing letter of 29 September 2016 confirming withdrawal of its objection
6. Drawing Ref: PA-2533-CPO-SLIDER showing requested modifications to Order Map in relation to Nos 47-49 Bridge Street (Plot Ref: Nos 24 and 55) identified in a bold red line edging and hatched green