

SALE OF LAND ON BIRMINGHAM ROAD / ST JOHN STREET, LICHFIELD

Deputy Leader and Cabinet Member for Leisure, Parks & Major Projects

Date: October 2024

Agenda Item:

Contact Officer: Simon Fletcher, Chief Executive, Anthony Thomas, Director Finance, Regulation and Enforcement (S151 Officer), and John Smith, Performance & Programmes Manager

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Key Decision? NO

Local Ward Members Stowe Ward – Cllr Russ Bragger, Cllr Hugh Ashton and Cllr Ann Hughes.



Lichfield
District Council

COUNCIL

1. Executive Summary

- 1.1 This paper proposes the sale of the land on the corner of Birmingham Road / St John Street, Lichfield. This is the first 'zone' (zone 1) proposed for sale on the city centre regeneration site known as the Birmingham Road Site (BRS). The proposal from the purchaser of this land is for a high-quality residential development, of approximately 100 – 112 homes, to be brought forward on the site.
- 1.2 The paper sets out the process the council has undertaken to arrive at this proposal, including the marketing of the site and how the preferred bidder has been identified. It introduces the Heads of Terms, (the contractual arrangements) for the sale of the land. It further shares some initial visuals of the type and quality of development proposed for the site. It also provides a legal appraisal of the process undertaken and best value considerations.

2. Recommendations

- 1.1. Council approves the sale of the land (zone 1) it owns on the corner of Birmingham Road / St John Street, Lichfield to CB Collier, and delegates authority to the Deputy Leader and Chief Executive in consultation with the Monitoring Officer and Section 151 Officer to conclude legals etc. subject to the financial implications being within the Approved Budget. This delegation is based on the Head of Terms included in this report and is subject to no material issues occurring with the Head of Terms or through Due Diligence of the bidder or their proposed scheme.
- 1.2. Council notes that on 16 April 2024 it approved a project being added to the Capital Programme for the anchor Food and Beverage Tenant for the cinema complex of **£1,700,000** funded by the capital receipt for this site. Therefore, the balance available to allocate from the net capital receipt of **£4,936,000** is **£3,236,000**.
- 1.3. Council approves an update to the Medium Term Financial Strategy:
 - To add a new project to the Capital Programme of **£2,000,000** funded by the capital receipt for Public Realm works, including a Linear Park, on the Birmingham Road Site.
 - To add a new project to the Capital Programme of **£1,236,000** funded by the capital receipt for capital investment in Burntwood, for projects emanating from the Burntwood Masterplan.

3. Background

- 3.1 The Council owns land (approx. 7 acres) adjacent to District Council House in Lichfield city centre, known as the Birmingham Road Site (BRS). This land was acquired in October 2007 at a total cost of £2.2m. The land was acquired for redevelopment, to regenerate the city centre.
- 3.2 During 2022 and 2023, the council reviewed its options for the redevelopment of the BRS site. The outcome of this review, informed by engagement with the community through Lichfield city centre masterplan sounding board, and councillors through Lichfield city masterplan task group, gave officers clarity over the approach to bringing the site forward (in individual 'zones' not as an overall offer) and the range and type of development that would be acceptable on the site. On the latter point, in the last few weeks a development brief for the remainder of the BRS site has been developed, minus zone 1 which is the subject of this paper. The BRS development brief has been discussed and welcomed by the Masterplan Task Group and is attached as Appendix A to this paper.
- 3.3 The agreed approach to the redevelopment of the site is to bring the individual zones to the market (residential and commercial) for sale and to engage over proposals for development on each zone with purchasers. This approach, alongside some stringent timeframes built into sales contracts, a new site-specific design code and our role as the planning authority, will enable us to retain some control over what happens on each of the zones.
- 3.4 Burley Browne, a West Midlands chartered surveyors and commercial property agent, was commissioned in December 2023 to undertake a competitive process to market the first zone, the land on the corner of Birmingham Road / St John Street, Lichfield. It was agreed in discussions between Cabinet and the Shadow Cabinets, following engagement with the groups introduced above, that a high-quality residential development was most appropriate for this zone and marketing in that way commenced in early 2024. This paper summarises the process to date including timeframes, number of interested parties and progress to date leading to the proposal in this paper to sell the land.

Marketing Zone 1

- 3.5 In February 2024, advertising started with Burley Browne implementing a marketing strategy which included local onsite marketing with the erection of for sale boards; press / website and social media, advertising to include press releases and canvassing of local, regional, and national housebuilders through direct approaches and use of circulation companies.
- 3.6 Strong interest was received with 56 parties registered on the Burley Browne website data room for the property to download the sales information. An offer deadline date of 26 April 2024 was set to invite offers for the land following the strong interest. By offer deadline date - 6 formal offers were received. Apart from one (an affordable housing scheme proposal) all were for private housing developments as desired.
- 3.7 Following presentation of the offers, where they were qualified, a shortlist of three proposals was created. These three met the value and quality criteria set and presented schemes with designs that were most likely to achieve planning permission, albeit there was a wide gap in terms of the quality of design proposed. All three bidders were invited to present their proposals to the council, to enable further discussion and challenge of their designs.
- 3.8 From June onwards, and following on from presentations and interviews, a series of clarification conversations took place with those shortlisted so that the council could compare bids on a like for like basis. This included clarification on the net offer made.
- 3.9 The outcome of that process identified two clear lead proposals set out in the Confidential Report.
- 3.10 CB Collier is identified as the preferred bidder. Their proposal is for an extremely high-quality design scheme (see initial diagrams at Appendix B). The best and final offer from CB Collier is set out in the financial implications of this paper and is made on the assumption they receive the full support of the council for their proposed vision, including increasing the density towards the upper end of their 100-112 unit range which they feel is more than achievable.

Who is CB Collier

- 3.11 Led by Charles Collier, CB Collier Management Limited has visited the site and met with council representatives several times and has completed their own extensive due diligence prior to making their final bid for the land on the corner of Birmingham Road / St John Street.
- 3.12 CB Collier is a multi-disciplined, solution-based team with 25 years' experience of delivering sustainable residential, healthcare and commercial development sites. As a specialist land and property development company, their core strength is dealing with complex brownfield sites to deliver sustainable, quality developments. Since 1997, they have successfully developed a portfolio of 5,000 residential plots, with £60m of additional employment land, 1.5million sq.ft of commercial office space and 750,000 sq.ft of care provision.
- 3.13 They provide a build-out development arm that operates across the Midlands with a strong track record of managing issues of conservation, demolition, remediation, contamination, planning and site access, and with an understanding of the specialist surveys required to deal with environmental and ecological issues. Appendix C provides case studies of other development schemes delivered by CB Collier.
- 3.14 They have extensive knowledge of Lichfield city and the site for sale, and their proposal has taken into consideration the council's planning policy requirements, the BRS Design Code and wider vision for the Birmingham Road Site whilst also providing a high quality, desirable development.
- 3.15 In addition, CB Collier are actively looking to locate their headquarters to Lichfield alongside some of their wider professional team, so this opportunity would be an extremely exciting project for their business moving forward.

What is the CB Collier proposal

- 3.16 CB Collier has developed an exciting housing development for this gateway site on the corner of St John Street and Birmingham Road. They have met with LDC and fully understand both the political and public interest in what is developed on this key gateway site in the centre of the city.
- 3.17 The proposed development is designed to minimise the impact on St John's, with an open plan view onto St John Street and a large open space area, giving both an open park area and high specification apartments that meet the required BRS Design Code and the aspirational living that we want to see on the site. Along the boundary of the Birmingham Road the development increases in height to take advantage of the existing architecture alongside St John Street. Please see Appendix B with images of proposed site plan and elevations.
- 3.18 The development will contain several different sized properties, with 24, 1-bedroom Apartments, 36, 2-bedroom apartments, 18, 3-bedroom apartments, x26, 4-bedroom apartments and 2, 3 bed townhouses, a total of 106 residential units. The site will also include a total of 146 parking spaces, provided through a mix of 31 above ground spaces and 115 below ground spaces, offering an innovative solution to city centre residential parking, whilst also ensuring open spaces are in abundance within the development and ensuring that parking will not add any additional pressure to existing city centre parking.
- 3.19 The development has considered access and egress, with main vehicular access off the Birmingham Road, giving access for residents, waste vehicles and emergency vehicles, with a direct drive through the site and exiting onto St John Street.
- 3.20 Members raised a number of other questions in the briefing meetings on 3 and 4 October 2024, the answers to most of these questions have been included within this report and when further information is provided this will be shared with Members.

What are the proposed Heads of Terms for the sale

3.21 Conversation over the Heads of Terms for the sale of this zone have been drafted by officers, with our advisers, and agreed in principle with CB Collier, subject to contract. These are as follows:

Agreed Terms & Timings	
Exchange of Contracts	Exchange of conditional contracts within 4 weeks of the date agreed heads of terms have been issued to solicitors.
Conditional Contract	<p>Following exchange of contracts, a conditional period of 12 months for the purchaser to submit and secure planning permission and to satisfy the contract conditions, as outlined below.</p> <p>Extendable for a further 12-month period in the event of a planning refusal and if both parties agree to an appeal; outstanding planning decision (non-determination or call in) or pending expiry of the statutory challenge period. This is the ultimate long stop date and is not capable of extension.</p>
Contract Conditions of sale	<ol style="list-style-type: none"> 1. Satisfactory planning permission for residential development (100-112 units to a design as outlined and presented to the seller). 2. Full Disclosure to the buyer of all works, CDM Files and surveys completed to date. 3. Legal Due Diligence
Submission of planning application	<p>The buyer will use reasonable endeavours to submit a planning application within 6 months of the date of exchange.</p> <p>The buyers are to submit a planning application for 100-112 units to a design as outlined, presented, and approved by the seller.</p> <p>The seller will support the buyer in progressing the planning application.</p> <p>If the planning application is not submitted within 6 months of the date of these heads of terms, the Seller can terminate the agreement on written notice.</p>
Completion date	<p>20 working days after an acceptable planning consent has been obtained. The definition of an acceptable planning consent will be agreed within the contract.</p>

Buy back option / Restriction on Title	<p>The Property will be subject to a Buy Back Option in favour of the Seller which the Seller can exercise during a period of [6] months commencing on:</p> <p>(a) [6 months and 20 working days] from the Completion Date where the Planning Permission has not been implemented; and (b) [] from the Completion Date in the event of the following Milestones not having been met: []</p> <p>(b) [24 months and 20 working days from the Completion Date where practical completion has not occurred].</p> <p>On exercise of the Option the Seller shall pay a 5% deposit of the price due. The price due will be equal to the price paid by the Buyer for the Property less the Sellers costs in exercising the option and any SDLT and HMLR costs payable by the Seller. The Seller will be granted step in rights to all construction documents and all relevant assignments of design and reports will be given.</p> <p>In addition, there will be a restriction on title on no disposition on title can take place until practical completion other than Permitted Disposals (individual plot sales, utility undertakers etc).</p>
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The Proposed Timeline for Delivery

3.22 The Proposed timeline for delivery shown below makes assumptions that CB Collier will use the full length of time at each stage. Meaning a practical completion by December 2027. This could be extended by 1 year if CB Collier fail to achieve planning permission by November 2025 but there is a longstop date for failure to achieve planning permission of November 2026.

- October 2024 - Council approval to sell to CB Collier.
- November 2024 - Exchange of Conditional Contracts.
- April 2025 - Planning Application Submitted.
- November 2025 - Planning Permission achieved.
- May 2026 – Deadline to commence works following planning permission.
(Assumes Planning Permission was achieved in November 2025).
- December 2027 – Deadline for Completion date.
(Assumes Planning Permission was achieved in November 2025).

3.23 There will be a variety of technical and deliverability challenges when bringing this development forward. CB Collier has a proven track record of resolving these types of challenges, these will include: dealing with ground conditions, any contamination and the local water table when creating the undercroft car park and any archaeological requirements that might arise; highways challenges for access egress to the development at what is a busy Junction in Lichfield; the impact on the Conservation Area and neighbouring historic buildings by providing a sympathetic design proposal; and sustainability challenges such as heating systems, renewable energy, green technology and sustainable materials needed for a development proposal. These challenges will materialise at a later stage through the planning application process and all bidders will have taken these challenges into consideration as part of their financial bid.

Alternative options	<ul style="list-style-type: none"> • The sale could be halted, and the site could be retained as is. • The sale could be halted, and a new disposal process could be undertaken. • The sale could be halted, and the site could be developed through a delivery vehicle such as a Joint Venture.
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- Accept the higher financial bid.

Consultation

Consultation has taken place with Ward Members and through two Member Briefings, and the views expressed are provided below:

- An explanation of the approach to calculating retail spend in the Kada research and the cost of disposal needs to be provided.
- Details of the buyback clause, how it works and what happens with a partially completed scheme if the buy-back becomes necessary will need to be included.
- The financial standing of CB Collier both to complete the purchase but also to successfully deliver the scheme needs to be considered.
- The incidence of subsidy being given for this type of scheme.
- The cost per foot of scheme – not sure if this is construction cost or sale value.
- The track record of GC Collier is related to previous schemes of a similar type.
- Confirmation that any contamination on the site is the risk of the Developer and will not be shared with the Council through a reduction in the receipt.
- Archaeological risk.
- The timeline of the development once approval from Council and early sharing of the report given the detail that will be included.
- Engagement with St John's.
- Removing reference to the wet-side changing rooms, projects should be based on the Burntwood Masterplan.
- There are various planning and highways considerations.
- How the Council Tax projections were calculated.
- Risks related to the water table and sandstone ground conditions on this site.
- The sustainability considerations include charging electric cars that have been considered as part of the comparison of the bids.

Financial implications

Site Valuations

See Confidential Report.

The Two Compliant Highest Bids

There were two compliant bids that were requested to submit Best and Final Offer (BAFO). These offers, the payment on exchange and the Developer's proposed funding are summarised in the confidential Report.

Approved and Recommended Projects funded by the Net Capital Receipt

Net Receipt	(£4,936,000)
Approved	
The Botanist Council 16/04/2024	£1,700,000
Sub Total - Approved	£1,700,000
Recommended	
Linear Park on Birmingham Road Site	£2,000,000
Burntwood Projects	£1,236,000
Sub Total - Recommended	£3,236,000
Total Capital Expenditure	£4,936,000

The Council has Opted to Tax the site and therefore VAT will be added to the capital receipt that is payable to the Council.

There would be Council Tax Payable for all Bodies and based on the number of units (assumed to be an average Band D for modelling purposes) in each bid, a Band D Council Tax in 2024/25 of **£2,155.20** and modelled over a 25-year period this would amount to:

Units	106
Total Council Tax (25 years based on Band D with 2% annual increases)	£7,308,023
Net Present Value @ Treasury Green Book Rate of 3.50%	£4,651,963

Band D Council Tax has been used in the calculation because although residential units may be valued in higher Council Tax bands based on the type of unit being provided, the occupants may not pay full Council Tax because they are entitled to

discounts such as Single Person Discount or Local Council Tax Support.

Approved by
Section 151
Officer

Yes

Legal
implications

There are two key legal requirements related to this sale and legal advice has been provided by Trowers and Hamlin:

Best Consideration

Due to the Council's decision to dispose of the Site, the Council must adhere to its obligations under section 123 of the Local Government Act 1972 (LGA 1972). Providing that the Council proceeds with the disposal of the Site, then **the Council is under an obligation to achieve the best consideration they can reasonably obtain for the Site** unless the Secretary of State has given consent to a disposal at an undervalue. The general rule is that this refers to financial considerations only, and social or other non-financial considerations cannot be considered. That said, the Secretary of State has provided a general consent to disposals at an undervalue of up to £2,000,000 in certain circumstances (the General Consent).

Our Legal Advisors have considered the General Consent to disposals at an undervalue, and their view is that the Council could rely on this to accept the lower offer from CB Collier. The higher offer represents the unrestricted land value for the purposes of the calculation in the Technical Appendix of the General Consent. As such, **the Council could accept an offer which is lower, provided that the offer is no lower than £3,500,000 and the Council can demonstrate that the lower offer will contribute to the economic, social, or environmental well-being of the area or residents in the area.**

We have also commissioned a full Economic review by KADA to support the proposal to sell the site to CB Collier. In every aspect the report shows that the CB Collier proposal offers better Social and Economic value to the city centre and district of Lichfield. The full report is available at Confidential Appendix D.

Subsidy Control

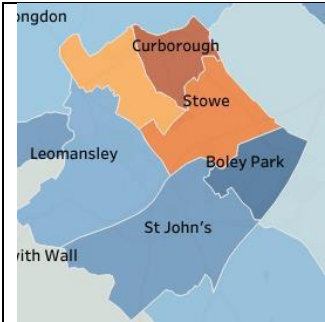
The Council's legal advisors have highlighted that the best financial offer was not submitted by CB Collier, with another bid offering the Council £310,000 more financial consideration than CB Collier (and £50,000 less deposit on exchange).

While the General Consent to disposals at an undervalue could be relied on in relation to Council's duty under s123 LGA 1972 (subject to suitable justifications being identified as to the economic, social, or environmental well-being contributions it represents), the Council will also need to be mindful of the Subsidy Control Act 2022. Detailed Subsidy Control

	<p>advice is included in this note, the Council should be mindful that disposal at an undervalue of £310,000 is, on the face of it, a subsidy. The Council will need to satisfy itself that such a subsidy can be lawfully given.</p> <p>Further legal advice has been received from Trowers regarding subsidy. It has been noted that the variance in the two offers made of £310,000 is within the Minimal Financial Assistance limit (MFA) of the Subsidy Control Act 2022. This allows the council to apply subsidy to any organisation in a rolling 3-year period of £315,000, this places the CB collier offer in line with the act and satisfies S123 of the LGA. LDC will need to register the subsidy applied.</p> <p>Interested parties may apply to the Tribunal for a review of the following subsidy decisions (reviewable subsidy decisions):</p> <ul style="list-style-type: none"> • the decision to give a subsidy (a standalone subsidy not given under a scheme) • the decision to create a subsidy scheme, including a streamlined route <p>A decision by a public authority to give a subsidy under a scheme (including any streamlined route) cannot be challenged because the eligibility criteria and terms and conditions of the scheme should ensure that all subsidies given under it are consistent with the principles and are not prohibited. If an interested party wishes to challenge a subsidy under a scheme, then they must challenge the scheme itself.</p> <p>However, this protection only applies if a subsidy genuinely falls within the terms of the scheme or route. If it does not, then the public authority should have treated it as an individual subsidy. An interested party can challenge a subsidy given under a scheme if there are grounds to believe that the subsidy did not meet the eligibility criteria and terms and conditions of the route, and therefore that the public authority should have conducted an assessment against the principles and prohibitions before giving the subsidy.</p> <p>As of 4 October 2024, the Subsidy Control database contains 1,353 awards with 1,347 under Minimal Financial Assistance and 6 under Public Economic Interest Assistance. The average value for all awards is £131,000 and for Local Authorities the average value is £116,000.</p>
Approved by Monitoring Officer	Yes

<p>Contribution to the delivery of the strategic plan</p>	<p>Our Lichfield District 2050 strategy was approved by the Council in May 2024, it's a collective commitment to make Lichfield District the most confident, prosperous, active, and green part of the country by 2050. The sale of the Ford Garage site will contribute to the targets by delivering:</p> <ul style="list-style-type: none"> • New housing permitted is designed in a way that complements and enhances our district, whilst also protecting and recovering our environment. • Housing, both new and old, supports our ambitions to be the greenest district in the country. • We are completing the regeneration of the Birmingham Road Site in Lichfield city centre to have a positive impact on residents. • We enjoy a vibrant, young, new residential zone on the Birmingham Road Site, with public open space as places people choose to gather.
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Equality, diversity and human rights implications	1. There are no equality, diversity or human right implications associated with the proposals at this stage.
EIA logged by Equalities Officer	Yes/no* Equalities Officer confirmed not required.
Crime & safety Issues	1. As the project moves from sale, through to the planning and redevelopment phases, these elements will be considered further to ensure any proposed development scheme plays a positive role in the reduction of crime and safety

Data assessment	<p>1. The former Ford garage site that is to be sold for residential development is in Stowe Ward and is surrounded by the areas shown below. The main components of the Social Progress Index (scores are 0 to 100 where 0 signifies worst and 100 best performance) for the Ward is summarised below:</p> <div style="display: flex; align-items: flex-start;">  <div style="margin-left: 20px;"> <ul style="list-style-type: none"> • Social Progress Index 48.8 being 20 out of 22 Wards. • Basic Human Needs 49.9 ranked 7 out of 22. • Foundations of Wellbeing 52.5 ranked 18 out of 22. • Opportunity 44.4 ranked 19 out of 22. </div> </div> <p>2. Bringing a highest quality developer, through a marketed approach, will ensure that a residential scheme fits with the needs of the city centre and will undoubtedly increase the vibrancy of the area and will potentially improve some of the scoring dimensions at Ward level.</p>
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Environmental impact (including climate change and biodiversity)	<p>1. The environmental impact of the development will be explored in detail as part of pre-planning application discussions, and the planning application that will be needed to bring forward a successful scheme.</p> <p>2. Mitigation measures and conditions including any related to climate change and biodiversity will be identified and agreed as part of any planning consent.</p>
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GDPR / Privacy impact assessment	1. No specific implications.
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	Risk description & risk owner	Original score (RYG)	How we manage it	New score (RYG)
A	Any disposal for less than best Consideration is challenged by a Developer Chief Executive	Risk: Red Likelihood: Red Impact: Red	Legal advice has been obtained. Further specialist advice on social, economic and environmental benefits of each bid has been obtained and is provided at Confidential Appendix D.	Risk: Yellow Likelihood: Yellow Impact: Yellow

B	Any disposal for less than best Consideration is not Subsidy Control Compliant Chief Executive	Risk: Red Likelihood: Red Impact: Red	Legal advice has been obtained. The subsidy is within the Minimal Financial Assistance regime and therefore a full principles-based assessment is not required. However, the subsidy will be required to be registered on the national database. This publication will start several time periods in relation to reviewing/challenging the subsidy provided.	Risk: Yellow Likelihood: Yellow Impact: Yellow
C	The delivery of the scheme does not take place in line with the Council's development aspirations Chief Executive	Risk: Red Likelihood: Red Impact: Red	A clause in the contract will enable the Council to reacquire the site if the site is not developed within a defined period	Risk: Green Likelihood: Green Impact: Green
D	Changes in the wider economy result in interest rate increases. This could mean debt costs increase making a bid funded by a significant level of debt unviable Chief Executive	Risk: Red Likelihood: Red Impact: Red	A financial assessment of both Developers has been undertaken to identify any concerns and the one related to CB Collier is shown at Confidential Appendix E and shows no significant risks. In addition, further information on the funding of the development, management of financial/commercial risks during the project and details of similar previous schemes has been provided in the report. A contract will be in place between the Developer and the Council that set out the obligations required of both parties for the disposal.	Risk: Green Likelihood: Green Impact: Green
E	Archaeological Risk with the Site Project Manager	Risk: Yellow Likelihood: Yellow Impact: Yellow	In July 2022, Prospect Archaeology Ltd carried out an Archaeological desk-based assessment alongside a Heritage Statement for the Birmingham Road Site for the council. The Archaeological Report concluded that the archaeological potential of the site is broadly understood though questions remain about the extent, state of preservation and character of remains in some areas, notably on St John Street frontages, and it is recommended that further trenching is undertaken in these areas to refine the current model. Any significant archaeological remains identified, where they are at risk from development, will require appropriate excavation and recording. All work should be undertaken in accordance with a written scheme of works approved by the Historic Environment Service, Staffordshire Council. This is in line with National Planning Policy Framework (NPPF) guidelines. The Heritage Statement concluded the proposed development will remove buildings which have an adverse effect on the setting of the listed buildings and character of the conservation area and that the development offers an opportunity to enhance the setting of both historic assets within the Site and the surrounding area. Both reports were made available to all bidders as part of the marketing process.	Risk: Yellow Likelihood: Yellow Impact: Yellow
F	Adverse reaction to the development from residents and stakeholders including adjacent properties Project Manager	Risk: Yellow Likelihood: Yellow Impact: Yellow	Engagement with stakeholders directly and through the planning application.	Risk: Yellow Likelihood: Yellow Impact: Yellow
G	The Buyback is enacted, and the Council has committed the capital receipt to projects	Risk: Yellow Likelihood: Yellow	Due diligence on the preferred bidder Contract in place with clear delivery milestones Engagement through the Planning Application	Risk: Green Likelihood: Green

	Director of Finance, Regulation and Enforcement	Impact: Yellow	Ability to undertake Prudential Borrowing to fund a shortfall (with a revenue cost)	Impact: Yellow
H	The cost of addressing on site contamination is higher than forecast and impacts on the capital receipt Project Manager	Risk: Yellow Likelihood: Yellow Impact: Yellow	Specific deduction from the capital receipt for remediation works. An open book approach to remediation costs. Remediation costs are fixed or the allowance is the worst-case scenario.	Risk: Green Likelihood: Green Impact: Green

Background documents	Appendix A - BRS Development Brief Appendix B - CB Collier high quality design scheme Appendix C – CB Collier Case studies of previous schemes
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Relevant web links	City centre gateway - Lichfield District Built Environment (ldcdevelopments.co.uk)
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