SHARPE PRITCHARD

SPOTLIGHT ON THE LAW

A round-up and look-ahead

January 2022

Each of the specialist teams at Sharpe Pritchard give their views on the cases and developments from 2021 that had a significant impact on their practice areas, and look ahead to what we may expect to see in 2022.

REAL ESTATE

Our Real Estate team looks ahead to changes coming in 2022, including the long-awaited introduction of the Land Registry's online portal, as well as proposed legislation relating to commercial rent arrears accrued during the COVID-19 pandemic.

The Land Registry is aiming to launch its new digital platform in time for the new financial year in April 2022. The Digital Registration Service ('DRS') will guide users through the making of their application with simple steps.

The aim of the advancement is primarily to reduce the number of requisitions issued as the information inputted is automatically checked before it is submitted. It will also be more straight-forward as the applicant will be prompted to add only the relevant information thus avoiding any confusion as to whether certain information is to be included. The online platform will be able to automatically populate certain fields based on data it already holds as well as calculate the fee charged. Finally, you will be able to start, save and come back to an application up to 90 days later.

It is hoped that the introduction of the DRS will result in a noticeable reduction in requisitions as, for example, simple spelling and typo errors are automatically flagged by the platform before submission. This, coupled with a reduction in time taken to produce the AP1 should ensure a quicker and smoother process for conveyancers. Looking further to the future, HMLR have set out a timeline including introducing a simplified Portal in February 2022, total withdrawal of Document Registration by November 2022 and it will soon be possible to use the same service to create TR1s and submit supporting documents.

Commercial Rent Arrears

The Commercial Rent (Coronavirus) Bill ('the Bill') was introduced in Parliament on 9 November 2021. The Government hopes to pass the Bill by 25 March 2022 providing it receives parliamentary approval.

The key points to note are:

- The Bill will only apply to commercial rent arrears that accrued while businesses were forced to close during the pandemic.
- The Bill will introduce a statutory arbitration process for commercial landlords and tenants who have not already reached an agreement; and
  - any agreements made voluntarily before the Bill comes into force will not be affected.
  - other remedies will be temporarily unavailable to landlords whilst the statutory arbitration process is in progress.
- Where debt claims have been initiated on or after 10 November 2021, but before the Bill is in force, they will be stayed if one of the parties applies for a stay. This is to enable the matter to be resolved by statutory arbitration or otherwise.
- But where judgment has been given in respect of a protected rent debt in that period, the matter may still be subject to statutory arbitration and enforcement will be stayed.
- Landlords will be unable to present:
  - winding-up petitions for protected rent debt during the moratorium period for statutory arbitration to take place.
  - bankruptcy petitions against individuals for protected rent debt where the statutory demand relied on was served (or, if an unsatisfied judgment is relied on, the claim was issued) on or after 10 November 2021.
- Any bankruptcy order made on or after 10 November 2021, but before the Bill comes into force in respect of protected rent debt will be void.

In addition to the Bill, a new **Code of Practice for Commercial Property Relationships Following the COVID-19 Pandemic ('the Code')** has been published. It provides guidance as to how parties should approach negotiation regarding rent arrears that accrued during the pandemic. The Code is intended to align with the Bill. It provides guidance on the arbitration process, the evidence that will be considered and the principles the arbitrator will apply.

Sharpe Pritchard's experienced Real Estate team provide expert advice to public sector clients on a range of commercial property and development projects, including acquisitions and disposals, asset management and advising on large-scale, complex and high value development and regeneration projects.

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EMPLOYMENT

The Employment team has spent 2021 advising on the radical changes brought about by COVID-19, Brexit immigration rules and new case law, exploring trends which are anticipated to continue into the new year.

In July 2021, Covid restrictions for England were eased and the public was no longer asked by the Government to work from home. Despite this COVID-19 remains a dominant theme in shaping changes to the workplace and employment law generally.

On 11 November 2021, it became law that anybody working or volunteering in a care home will need to either be fully vaccinated against Coronavirus or be exempt. The Government has passed the Health and Social Care Act 2008 (Regulated Activities) (Amendment) (Coronavirus) Regulations 2021. These Regulations are already proving highly controversial in the Care Sector.

The *'no jab, no job'* policy introduced by Pimlico Plumbers earlier in the year caught headlines but there has been a reluctance for many organisations to follow this policy. The risk of an employment claim is high, as an employee who refused to be vaccinated is likely to bring a claim for unfair dismissal and discrimination. However, with a greater number of the population vaccinated, in 2022 we may see more organisations introducing similar policies.

Many organisations are now in a process of managing the return to work and determining their organisation's working practices for the future. Organisations are having to decide whether their staff should be fully remote, if attendance at the workplace should be mandatory or a hybrid working policy should be adopted.

Moving away from COVID-19, Brexit continues to cause headaches for organisations. The shortage of workers in some sectors is having a detrimental impact and since 1 July 2021 organisations must assess an employee's immigration status under the EU Settlement Scheme or the new points-based immigration system.

In early November 2021, the Supreme Court heard the controversial case of *Harpur Trust v Brazel*, with judgment to be handed down shortly. In the decision of the Court of Appeal, it was held that an employee who is employed under a permanent contract, but who only works for part of the year, should receive the same 5.6 weeks' holiday entitlement as an individual who works all year round. This has been appealed and the decision of the Supreme Court could have a huge impact on how holiday pay is currently calculated.

In summary, in 2022 organisations will have to navigate a challenging mix of radically changing workplaces, Brexit related immigration law changes and fast paced and substantial case law!

Sharpe Pritchard has an experienced employment team, who regularly advise public sector clients on all manner of contentious and non-contentious employment law. Sharpe Pritchard is ready to advise on any return-to-work issues, right to work checks and undertake complex employment litigation.

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CONSTRUCTION AND COMMERCIAL

2021 was a busy year for the Commercial Contracts and Construction team, as our clients felt the ongoing effects of the COVID-19 pandemic and Brexit began to bite. Claims for extensions of time and loss & expense continued to be big themes, owing to materials and labour shortages across industries.

At the start of 2021, we were busy digesting the newly published Construction Playbook, which sets out a best practice framework to achieve better, faster, greener delivery. In addition to advising clients on what the Playbook meant for them, we wrote an article on the Playbook's approach to risk and innovation for EM LawShare and provided training to G4C on the 14 key policies.

Procurement was brought to the public's attention this year by the Good Law Project, who successfully challenged the Government's pandemic-related procurements via judicial review on several occasions. These cases, and the more recent issues regarding the contracts with Randox, have brought the importance of fair competitive procurement processes into the wider spotlight. We have written about the implications for contracting authorities on the rise of judicial review, on the requirement for transparency in public procurements, and on some of the lessons to be learned from individual cases here and here.

A number of other interesting cases were heard this year:

- The paths of procurement law and granting an interest in land do not often cross, but they did in *European Commission v Republic of Austria* (Case C-537/19). This case illustrated that an Authority's influence on design can turn that grant into a public works contract, which then has to be the subject of a competitive procedure.
- In July, the Supreme Court handed down its long-awaited judgment in *Triple Point Technology v PTT Public Company Ltd* [2021] UKSC 29. This case concerned the application of liquidated damages, with the Supreme Court's decision **bringing welcome clarity** following the confusion created by the Court of Appeal in 2019.
- The difficulties for the local authority leisure sector, both during and emerging from the pandemic, were illustrated in *Westminster City Council v Sports and Leisure Management* [2021] EWHC 98 (TCC).

Looking ahead to 2022, we hope to see the enactment of the Building Safety Bill, which focuses on improved regulation of the building control sector, the ongoing monitoring of safety in higher-risk residential buildings, as well as stricter regulation of construction materials. Along with our Infrastructure colleagues, we are also keen to see the development of the Green Paper on Transforming Public Procurement.

Climate change will continue to be at the forefront of our and our clients' minds, and we are interested to see how the debate affects the construction industry in particular, as it innovates to make construction greener and more sustainable. Lastly, having witnessed how effectively the world moved to online working as a result of lockdowns, with even mediation successfully transitioning to an online format, we will be watching to see whether this trend continues.

As the economy aims to recover from the double blow of Brexit and Covid, we will be paying attention to all these developments and more.

Sharpe Pritchard has an experienced commercial contracts and construction team. We regularly advise public sector clients on contentious and non-contentious construction matters, and on all manner of commercial contract matters.

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INFRASTRUCTURE

Developments in infrastructure law and policy continued at pace in 2021, and there is no sign of them slowing down this year. The Infrastructure team considers developments in COVID-19 recovery, environmental policy and proposed reforms to the public procurement regime.

The Government's long term plans have been outlined in the Infrastructure and Projects Authority's **National Infrastructure and Procurement Pipeline** and **Roadmap to 2030**. Both publications focus on the key role of infrastructure in COVID-19 recovery, promoting societal outcomes, and encouraging sustainability.

In a year where the IPCC's Fifth Assessment Report described climate change as "code red for humanity", there has been a global focus on environmental strategies. The Government published its **Net Zero Strategy** outlining how infrastructure can help the UK "build back greener". Other key publications included:

- **The Heat and Buildings Strategy**, which envisions heat pumps and district heating schemes as crucial factors in achieving net zero by 2050, especially in the context of phasing out the installation of new gas boilers by 2035.
- The **UK Hydrogen Strategy** and the DfT's report **Decarbonising Transport**, which both highlight the key role hydrogen vehicles will play in the UK's Net Zero plans.

The Infrastructure team has seen an increasing number of clients requesting advice on undertaking low-carbon heating and hydrogen vehicles projects, as well as advice on how the various environmental strategies outlined above will affect them.

The enactment of the **Environment Act 2021** in November has wide-reaching implications, including for waste collection and disposal authorities. Our team is advising local authorities on the implications of separate collection obligations, and we are on hand to assist as further regulations are introduced under the Act.

Our team has been briefing public bodies on the implications of the **Transforming Public Procurement** Green Paper, to which the Firm submitted a consultation response in March 2021. In the paper, the Government states that the wide-ranging changes proposed will increase transparency and flexibility and simplify the procurement regulations. The **consultation response** was published in December 2021 and while the majority of proposals will be taken forward, some controversial aspects (such as the removal of the Light Touch Regime and introduction of a maximum cap on damages) will not. Other proposals have been amended to take the responses into account; for example, to prevent excessive administrative burdens on contracting authorities, the proposal relating to the publication of contract documents will now apply initially only to contracts above a value of £2 million. We now eagerly await the publication of legislation, but this is not expected to take effect until 2023 at the earliest.

Another area of note has been the judicial review challenges by the Good Law Project against various procurement decisions taken by the Government during the COVID-19 pandemic. The cases have highlighted that public authorities must be alive to their underlying public law duties, in addition to their statutory obligations under the procurement regulations, when undertaking procurements and awarding contracts at all times, even in extreme circumstances such as the COVID-19 pandemic.

Our experienced Infrastructure team regularly advises public sector clients on all aspects of their projects, including procurement rules, contracts, and corporate structuring. We are able to assist clients in navigating the procurement regime, statutory obligations and opportunities provided by new government policies.

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PLANNING AND PARLIAMENTARY

The Planning and Parliamentary team have been keeping up with a number of developments, including new requirements in relation to electric charging points; but will this lead to an electric vehicle revolution?

In a speech to the CBI in November 2021 better known for references to Peppa Pig, the Prime Minister announced that the Government would bring forward new legislation to ensure that new homes and buildings such as supermarkets and workplaces, as well as those undergoing major renovation, will be required to have electric vehicle charge points. This seems like an easy win for the Government – the headline is punchy, simple, and seemingly effective. However, it remains to be seen whether the details live up to that headline.

Current position

Whether Councils have the power to mandate charging points as part of new developments depends on national and local planning policies. The NPPF 2021 requires that planning applications should enable charging of plug-in and other ultra-low emission vehicles in safe, accessible, and convenient locations. National policy therefore envisages support for electric vehicle charging points being provided as part of developments, but it stops short on the detail. There is no UK wide requirement for electric vehicle charging provision.

As an example of local policy, the London Plan 2021 requires that 20% of any parking spaces in new residential developments have active charging facilities, with the remainder having passive provision (cables and power supply to enable a socket to be added easily later). Office and retail parking must be provided with infrastructure for charging in various active/passive forms. Many local authorities have developed their own local plan policies and guidance, some requiring a certain amount of charging points to be provided, others saying that future provision be provided where reasonable and proportionate. There is therefore a trend towards local authorities requiring charging points and relevant infrastructure as part of new development.

The usual route to securing the provision of charging points is through a planning condition. Provision could also be made off-site by requiring developers to enter into highways agreements or by requesting that the developer pay a contribution to be used by the relevant authority.

Analysis

Hopefully the policy will result in a consistent approach across the country, which should help to ease concerns of car buyers about access to charging points. However, the practical impacts may be limited. There are a few reasons for this:

- The Government has yet to announce the details – for example, how many charging points will be required and what constitutes a 'major renovation'? The details will influence how much of a real practical change there will be compared with existing local policies.
- The huge amount of residential properties which do not have any off-road parking is the elephant in the room and it is unlikely to be dealt with by planning regulations.
- Encouragement to buy electric vehicles – the proposed ban on the sale of new petrol and diesel vehicles is some way off. In the meantime, policies to increase the number of charging points will need to be matched by an investment in grants, loans, and other financial (and other) incentives to encourage homeowners to make the switch.

A much broader question is whether the Government is right to be focusing its efforts on encouraging continued reliance on private modes of transport and whether investment in, and a focus on, policies which encourage the use of sustainable transport (such as cycling, walking, and public transport) would be a better use of resources to help to achieve some of the key government climate change commitments. Of course, it is not simply a case of one or the other, and the Government may well make further announcements in the near future which are focused on sustainable transport reforms.

As always, much will depend on the detail of the policy. Whether the changes will lead to an increase in the provision of electric vehicle charging points or have any practical effect, remains to be seen.

The Sharpe Pritchard planning team routinely acts for public sector and private sector clients throughout the planning application process, from pre-application to judicial reviews. We have a wealth of experience advising clients on key planning issues and are expertly placed to assist clients with any queries arising in respect of environmental and climate considerations.

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ICT, DATA AND CORPORATE

The ICT, Data and Corporate team has spent much of 2021 focusing on changes since Brexit, both in terms of Data Protection and Subsidy Control rules, and what that means for the beginning of the UK's entry into a new era outside of the EU. The team has also been advising on high value joint ventures and has provided corporate governance advice on some of the UK's most significant infrastructure projects.

In general, data protection rules are relatively unchanged after the conclusion of the transition period, as GDPR has been incorporated into UK law, and domestic legislation such as the Data Protection Act 2018 continues to apply. However, the UK is now a "third country" for data protection purposes, meaning data transfers from the EEA into the UK will be restricted unless the transfer of personal data is covered by an adequacy decision, appropriate safeguard or exception. The EU Commission granted an adequacy decision to the UK in June 2021 which will be in place for four years.

Our team has advised a number of businesses on the implications of this change, which include:

- Complying with EU GDPR if they carry out particular actions within the EEA, including offering goods or services, monitoring the behaviour of individuals within the EEA, or having branches and offices in the EEA;
- Considering the appointment of European representatives or a new "lead supervisory authority" to support compliance;
- Assessing the safeguards they have in place when carrying out international data transfers; and
- Reviewing GDPR compliance documentation in light of changes resulting from Brexit.

We have also been keeping track of developments relating to the new Subsidy Control Bill (the "Bill"). The Bill lays the groundwork for the regime which will replace the EU State Aid regime. The implications of the Bill include the following:

- The new rules appear to be more principles based than the prescriptive EU state aid regime, expanding the freedoms of public authorities to grant subsidies. While this could provide an opportunity for greater and more innovative interventions, it could also lead to less certainty as to what is and is not lawful.
- A clear enforcement route is outlined in the Bill, with the rules being enforced through the UK tribunal system. Interested parties can apply to the Competition Appeals Tribunal for a review of a subsidy decision. Enforcement and challenges are time limited which will provide greater certainty for beneficiaries of subsidies and public authorities alike.
- The Government has largely transposed the provisions of the Trade and Cooperation Agreement into the Bill. We consider this is a positive step as alignment of the two regimes is helpful. Where the two regimes diverge there will be a question about how domestic legislation should be interpreted within the context of the Trade and Cooperation Agreement.
- It is also important to remember that under the Northern Ireland Protocol, certain subsidies are still covered by the EU regime.

Our team will be following the passage of the Bill through parliament with interest.

Our ICT, Data and Corporate team is on hand to provide expertise in data protection and subsidy control, as well as in a variety of corporate issues, to private and public sector clients.

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TELECOMS

In the past year our telecoms team has been paying close attention to the work of the Upper Tribunal, who have been determining disputes and providing further clarity around aspects of the Electronic Communications Code, which is now approaching the end of its fourth year since being introduced under the Digital Economy Act 2017.

The aim of the Code is to facilitate improved connectivity, and operators rapidly advanced on occupiers of potentially suitable sites, mostly rooftop sites within urban areas, to capitalise on the broad-ranging powers afforded to under the new provisions.

This year also saw the introduction of the Telecommunications Infrastructure (Leasehold Property) Act 2021, which removes another 'roadblock' for operators and enables them to access and provide apparatus to multi-let dwellings where the landlord is unresponsive or uncooperative. The cases that emerged initially following the introduction of the 2017 Code dealt predominantly with site providers seeking to oppose the installation of telecoms apparatus, but cases published over the past year are concerned primarily with the process and test threshold for the grant of interim rights (i.e. initial/intrusive surveys and the terms of MSV (multi-skilled visit) agreement – see *Cornerstone Telecommunications Infrastructure Limited v St Martins Property Investments Limited [2021] UKUT 262* and *(1) EE Limited and (2) Hutchison 3G UK Limited v The Mayor and Burgesses of the London Borough of Hackney [2021] UKUT 142 (LC))*, as well as renewal of Code agreements (see *Cornerstone v (1) Ashloch and (2) AP Wireless [2021] EWCA Civ 90*) and the transitional provisions applicable to subsisting agreement (see *Arqiva Services Ltd v AP Wireless II (UK) Ltd [2020] UKUT 195 (LC)*).

The Tribunal set out the extremely high threshold that site providers need to establish to refuse the grant of Code rights in *Cornerstone Telecommunications Infrastructure Ltd v University of The Arts London [2020] UKUT 248 (LC)*, which remains the only example of a site provider successfully opposing the grant of new Code rights. However, a properly advised site provider is not without options and our telecommunications team has acted on behalf of various residential property management companies and local authorities this year to:

- successfully oppose a new installation based on planning grounds;
- take strategic action causing an operator to reconsider the suitability of a potential site; and
- obtain the best terms in an MSV agreement and final Code agreement to minimise the impact and potential disruption of a new installation, as well as negotiating appropriate compensation.

Our team has also received an increase in requests for advice on the process for termination and removal of telecommunications apparatus based on the redevelopment ground, which we expect to continue throughout 2022 as stalled construction and development plans materialise.

Sharpe Pritchard's Telecoms team is dedicated to acting for landowners and regulatory works alongside project teams and specialist telecommunications surveyors.

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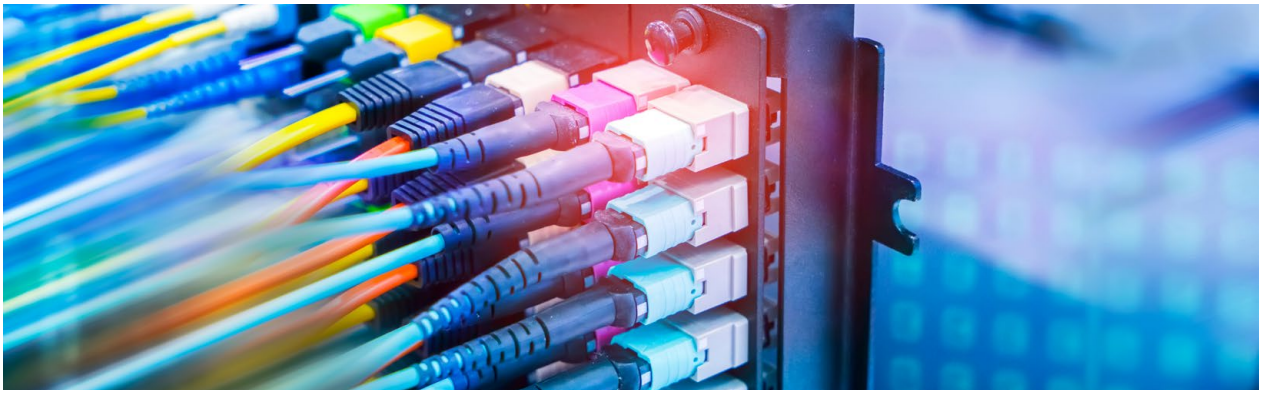

DISPUTE RESOLUTION AND LITIGATION

Heading into 2022, our Litigation team is keeping an eye on *London Borough of Barking and Dagenham & Others v Persons Unknown & Others*, an upcoming Court of Appeal case that could affect local authorities' ability to obtain injunctive relief against 'Persons Unknown'.

On 12 May 2021, the High Court held, *inter alia*, that:

- Injunction Orders bind only the parties to the proceedings at the date of the Order and do not bind newcomers.

Certain local authorities are appealing to the Court of Appeal on this issue. Sharpe Pritchard are coordinating the appeals to the Court of Appeal on behalf of the local authorities.

Background

The local authorities' claims concern Gypsy and Traveller injunctions. In each case an interim Order has been granted that binds Persons Unknown. The councils had intended to apply for a final Order that also binds Persons Unknown.

- The COA decided in the case of *Canada Goose UK Retail Ltd v Persons Unknown* [2020] EWCA Civ 303, a case concerning protestors, that final injunctions bind only parties to the proceedings and that the Court could not make a final injunction order against Persons Unknown.

- *Canada Goose* applied *Cameron v Liverpool Victoria Insurance Ltd* [2019] UKSC 6, where the Supreme Court confirmed that proceedings may not be brought against unnamed parties, save for at the interim stage of proceedings.

Court of Appeal

Certain local authorities contend, *inter alia*, that:

- The decision made by the Judge was wrongly ruled because *Canada Goose UK Retail Ltd* and *Cameron* were not concerned with statutory powers that permitted a claim to be bought against Persons Unknown i.e. Traveller injunctions pursuant to section 187B Town and Country Planning Act 1990, which provides a statutory power to grant an injunction against Persons Unknown.

- The Judge was wrong to hold that the injunction Order binds only the parties to the proceedings at the date of the order and does not bind newcomers. The Learned Judge failed to take into account that in certain circumstances the Court is entitled to grant an injunction that binds newcomers.

The decision focuses on the impact of local authorities bringing injunctions against Gypsies and Travellers' unlawful encampments. However, it is likely to have much wider application as local authorities have used the same statutory provisions to seek injunctions against 'persons unknown' to restrain activities such as car cruising and raves.

We anticipate the decision of the hearing and continue to provide advice on this subject to a few dozen authorities.

We have a team of expert litigators available to provide advice on all aspects of 'traveller injunctions', as well as on a wide range of other local authority litigation matters, including all aspects of Judicial Review, and appellate work right up to the Supreme Court.

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