Please note my interest:
Priorities, Restrictions and Notices under the Land Registration Act 2002

A paper for Property Litigation Association
Autumn Training Day
on Thursday, 7th November 2013

By

Daniel Gatty
Hardwicke
These notes contain a survey of the main rules concerning the priority of interests in registered land and of the main tools for protecting priority, notices and restrictions. They are by no means comprehensive but are intended as an, hopefully helpful, aide-memoire of the main points.

1. **Priorities in registered land**

1.1. Under the Land Registration Act 1925 the normal rule was that the priority of interests was determined by the time of their creation, subject to an exception for registered dispositions. Equitable interests ranked in the order of their creation unless the equities were unequal, just as they did in the Courts of Chancery. Unfortunately, there was some uncertainty about when equities were to be treated as unequal. When the Law Commission drafted what became the Land Registration Act 2002 it sought to keep more or less the same approach to priorities as under the 1925 Act but to do away with the uncertainty about unequal equities. It proposed that there be a basic rule that all interests should rank in the order in which they were created subject to an exception for registrable dispositions.¹

### The basic rule

1.2. To give effect to that rule, s. 28 of the LRA 2002² reads:

**28 Basic rule**

(1) Except as provided by sections 29 and 30, the priority of an interest affecting a registered estate or charge is not affected by a disposition of the estate or charge.

(2) It makes no difference for the purposes of this section whether the interest or disposition is registered.

1.3. While that may not be the most obvious way of expressing a principle that interests in land rank in the order of their creation, it has been recognised as having that effect. See, for example, *Halifax Plc v Curry Popeck (A Firm)* [2008] EWHC 1692 (Ch) at [25]-[26] and Ruoff & Roper on Registered Conveyancing at [15.004].

1.4. The basic rule does not apply to the priority of registered charges as between themselves. S. 48 provides for a different rule in that regard. Between themselves,

---

¹ Land Registration for the 21st Century, LC271 at paras. 5.2 – 5.5.
² Unless otherwise stated, all references in these notes to sections of a statute are to the Land Registration Act 2002.
registered charges rank in the order in which they appear in the register, not in the order of their creation (if that is different). The chargees can, and often do, agree a different order of priority, however.

The priority of registrable dispositions

1.5. Although the basic rule is that the first in time has priority, that rule is subject to the very large exception provided for by s. 29, which reads:

29 Effect of registered dispositions: estates

(1) If a registrable disposition of a registered estate is made for valuable consideration, completion of the disposition by registration has the effect of postponing to the interest under the disposition any interest affecting the estate immediately before the disposition whose priority is not protected at the time of registration.

(2) For the purposes of subsection (1), the priority of an interest is protected—
(a) in any case, if the interest—
   (i) is a registered charge or the subject of a notice in the register,
   (ii) falls within any of the paragraphs of Schedule 3, or
   (iii) appears from the register to be excepted from the effect of registration, and
(b) in the case of a disposition of a leasehold estate, if the burden of the interest is incident to the estate.

(3) Subsection (2)(a)(ii) does not apply to an interest which has been the subject of a notice in the register at any time since the coming into force of this section.

(4) Where the grant of a leasehold estate in land out of a registered estate does not involve a registrable disposition, this section has effect as if—
(a) the grant involved such a disposition, and
(b) the disposition were registered at the time of the grant.

1.6. Hence, the priority of an interest in a registered estate which is not protected in one of the ways listed in s. 29(2) will be postponed to that of a registrable disposition made for valuable consideration as soon as the latter is registered. For example, if A enters into a

---

3 S. 30(1)-(3) contains materially identical provisions to s. 29(1)-(3) in the case of registrable dispositions of a registered charge.
contract to sell Whiteacre to B on 31.3.12 but then takes out a mortgage over Whiteacre with C on 30.4.12, B’s interest under his contract will have priority over C’s interest as first in time until C registers his charge, but at that point it will lose priority to C’s interest unless B has protected his estate contract under s. 29(2). If B has not protected his estate contract, C could, for example, sell Whiteacre pursuant to its mortgagee’s power of sale free of any claim by B to enforce his contract to buy it. And B could only buy Whiteacre subject to C’s charge if A could not or would not redeem it.

1.7. The priority of B’s interest can be protected by registering a notice in respect of it prior to the grant (grant, not registration) of the mortgage to C, or it may be protected as an overriding interest\(^4\) if B had already gone into occupation of Whiteacre before the grant of the mortgage to C. If it is protected in one of those ways, C’s interest under his charge will be subject to B’s prior equitable interest under his contract.

1.8. In order for s. 29 to have a bearing, the interest competing with the registrable disposition must have affected the estate immediately before its disposition (see s. 29(1)). If the competing interest arises after the registrable disposition, it will not have priority to the disposition in any event under the basic rule contained in s. 28 (unless the interest itself is a registrable disposition for value and becomes registered first).

1.9. S. 27(2),(3) lists those dispositions which must be completed by registration, i.e. which are registrable dispositions. They are:

In the case of a registered estate:-

(a) a transfer,

(b) where the registered estate is an estate in land, the grant of a term of years absolute—

(i) for a term of more than seven years from the date of the grant,

(ii) to take effect in possession after the end of the period of three months beginning with the date of the grant,

(iii) under which the right to possession is discontinuous,

(iv) in pursuance of Part 5 of the Housing Act 1985 (c 68) (the right to buy), or

(v) in circumstances where section 171A of that Act applies (disposal by landlord which leads to a person no longer being a secure tenant),

(c) where the registered estate is a franchise or manor, the grant of a lease,

\(^4\) Interests that override registered dispositions are set out in Sch. 3 to the LRA 2002.
(d) the express grant or reservation of an interest of a kind falling within section 1(2)(a) of the Law of Property Act 1925 (that is easements or profits) other than one which is capable of being registered under Part 1 of the Commons Act 2006,

(e) the express grant or reservation of an interest of a kind falling within section 1(2)(b) or (e) of the Law of Property Act 1925 (rentcharges), and

(f) the grant of a legal charge;

In the case of registered charges:

(g) a transfer of the charge, and

(h) the grant of a sub-charge.

1.10. Hence, the assumption that Briggs J (as he then was) was persuaded to make in Hughmans v Central Stream Services Ltd [2012] EWHC 1222 (Ch) that the making of a final charging order is a registrable disposition is very likely wrong. Charging orders are, of course, equivalent to equitable charges. While the priority of equitable charges can be protected against registrable dispositions by putting a notice on the register, they are not themselves registrable dispositions (which are dealings with or the creation of legal interests, not with equitable ones).

Short leases

1.11. For the purposes of ss. 28 to 30, the grant of a lease which is not a registrable disposition, i.e. a lease for 7 years or less, is treated as if it were a registrable disposition which was registered on the date of grant, by dint of s. 29(4). So a (legal) lease for, say, 5 years will obtain priority under s. 29(1) and s. 29(4) over any prior interests in the property that are not protected under s. 29(2) on the day of the grant of the lease.

1.12. S. 29(4) only applies to legal leases, not equitable ones. So a tenancy for up to 7 years which does not amount to a legal lease (say because it is for a term of over three years and not made by deed or because it is granted by someone who is themselves only an equitable owner) cannot obtain priority over prior interests under s. 29(1). See The Mortgage Business plc v O'Shaughnessy [2012] 1 WLR 1521 at [59]-[61] per Etherton LJ.

5 At [21]. The mistaken assumption did not affect the outcome nor the dismissal of an appeal against Briggs J's judgment by the Court of Appeal (at [2012] EWCA Civ 1720)

6 They can only be protected by a notice if the charging order is against the whole interest in the property, not if it is against the beneficial interest of just one of 2 or more co-owners.
Void disposition

1.13. A recent decision, *Fitzwilliam v Richall Holding Services Limited* [2013] EWHC 86 (Ch), [2013] 1 P. & C.R. 19, considered whether a transfer which would be void at common law because made pursuant to a forged power of attorney was nonetheless a registrable disposition for the purposes of s. 29. If it was, the question would arise whether the true owner’s interest in the property had been postponed to that of the buyer from the fraudster on the registration of the transfer. In *Malory Enterprises Ltd v Cheshire Homes (UK) Ltd* [2002] EWCA Civ 151, [2002] Ch 216, the Court of Appeal had held that a forged transfer was not a disposition for the purposes of the LRA 1925. In *Fitzwilliam*, Newey J noted and expressed some sympathy with the academic criticisms that have been made of the decision in *Malory Enterprises*. However, he held himself bound by it to conclude that the transfer in *Fitzwilliam* was not a disposition and so could not attract priority under s. 29.

Priority searches

1.14. It must be remembered that the ordinary rules of priority under ss. 28 and 29 may be dislodged if there is an official search with priority affecting the title. Such a search freezes the register during a 30 business day priority period in favour of someone who is intending to but has not yet entered into a registrable disposition. The person with the benefit of the search will obtain priority for that disposition, if it is completed and registered during the priority period, over entries on the register applied for during that period. For example, X intends to purchase Blackacre from Y and obtains a clear priority search on day 1. On day 2 Y grants Z an option to purchase Blackacre and Z applies to enter a notice in respect of the option. On day 3 X buys Blackacre from Y and he applies to register his purchase on day 4. As a result of the priority search, X takes Blackacre free from Z’s option. But for the priority search, X would have taken subject to Z’s option which would have had priority under the basic rule and been protected under s. 29(2)(a)(i).

1.15. A priority search is effective to prevent a short lease obtaining priority under s. 29(1),(4); see *The Mortgage Business plc v O'Shaughnessy* [2012] 1 WLR 1521 at [63-64]. However, a priority search does not confer any priority over an interest which is an overriding interest under Sch.3 to the Act. Priority searches only operate to postpone

---

one entry in the register to another entry on the register. Since overriding interests do
not need to be protected by an entry in the register, a priority search can have no effect
against them.

Seeking to sidestep the priority rules

1.16. Finally under this heading, attempts have sometimes been made to overcome the
priority rules prescribed by the LRA 2002, and before it the LRA 1925, by alleging that
the purchaser takes subject to a constructive trust in favour of the party who otherwise
would have lost priority on registration of the purchase. In Chaudhary v Yavuz [2013]
Ch 249 the Court of Appeal rejected such an attempt. The Court accepted in the light of
Lyus v Prowsa Developments Ltd [1982] 1 WLR 1044 that it is possible for a
constructive trust to arise against a purchaser which overcomes the usual priority rules
but, giving the only reasoned judgment, Lloyd LJ observed:

“I know of no English case in which the precedent of the Lyus case has been
used successfully to make binding on a purchaser an interest which could be but
was not protected on the register as against him”.

2. Notices

2.1. As should be apparent from the discussion above, notices on the register have but one
function: to prevent the interest protected by the notice losing priority to a later
registrable disposition for value which would, but for the notice, obtain priority under s.
29(1) or 30(1).

2.2. A notice is “an entry in the register in respect of the burden of an interest affecting a
registered estate or charge”. As s. 32(3) states:

“The fact that an interest is the subject of a notice does not necessarily mean
that the interest is valid, but does mean that the priority of the interest, if valid, is
protected for the purposes of sections 29 and 30.”

2.3. Notices come in two flavours, agreed notices and unilateral notices. Both have the
same function but the requirements for entering the former on the register are different

---

8 See also Groveholt v Hughes [2013] 1 P & CR 20
9 S. 32(1) of the LRA 2002
from the requirements for entering the latter. Also, it is harder to obtain the removal of an agreed notice than a unilateral notice.

What interests are capable of protection by a notice?

2.4. A wide range of interests can be protected by a notice – so long as they affect a registered estate or charge, i.e. the legal title to an interest or charge. Rather than listing what types of interest can be protected by a notice, the Act identifies interests in respect of which a notice cannot be entered. The main ones are:

(a) An interest arising under a trust of land.
(b) An interest arising under a settlement under the Settled Land Act 1925.
(c) A leasehold interest in land which is granted for a term of three years or less from the date of the grant and which is not required to be registered.
(d) A restrictive covenant made between lessor and lessee so far as relating to the demised premises.
(e) An interest capable of being registered under the Commons Registration Act 1965.
(f) A bankruptcy order.
(g) A petition in bankruptcy.
(h) An order appointing a receiver or sequestrator.
(i) A deed of arrangement.\(^\text{10}\)

2.5. One of the interests affecting registered land which must be protected by a notice if it is to bind purchasers for value is the burden of a restrictive covenant. However, in a recent decision of the Court of Appeal, Goodman v Elwood [2013] EWCA Civ 1103, it was held that the burden of a positive covenant enforceable against successors in title to the original covenantor on the equitable principle of benefit and burden does not have to be protected by a notice on the register.

Agreed Notices

2.6. As the name suggests, agreed notices are normally entered in respect of undisputed interests. Not always however. It is possible to enter an agreed notice which is not, in fact, agreed by the registered proprietor at all. S. 34(3) provides:

\(^{10}\) Ss. 33, 86 and 87 of the LRA 2002
The registrar may only approve an application for an agreed notice if—
(a) the applicant is the relevant registered proprietor, or a person entitled to be registered as such proprietor,
(b) the relevant registered proprietor, or a person entitled to be registered as such proprietor, consents to the entry of the notice, or
(c) the registrar is satisfied as to the validity of the applicant’s claim.

2.7. So if sufficient evidence can be produced to satisfy the Land Registry of the validity of the interest in respect of which the agreed notice is sought, the registrar will enter the notice without requiring the proprietor’s consent. The Land Registry is not obliged to notify the proprietor that an application has been made for an agreed notice before entering the notice in the register. Notification will normally be given subsequently.

2.8. Rule 87 of the LRR 2003 provides for applications to cancel an agreed notice (except for a matrimonial homes rights notice) if the protected interest has determined. But there is no specific procedure for an aggrieved proprietor to apply to cancel an agreed notice if it should not have been entered in the first place. He would have to apply to alter the register on the grounds that the notice had been entered by mistake.

2.9. Five categories of interest can only be protected by an agreed notice, not by a unilateral notice:
(a) Home rights under the Family Law Act 1996.
(b) An Inland Revenue charge in respect of inheritance tax.
(c) An interest arising pursuant to an order made under the Access to Neighbouring Land Act 1992.
(d) A variation of a lease effected by or under an order under s. 38 of the Landlord and Tenant Act 1987 including any variation as modified by an order under s. 39(4), of that Act.
(e) A public right or a customary right.¹¹

Unilateral Notices

2.10. While it is possible to obtain the entry of an agreed notice in respect of a disputed claim, it is more usual to apply for a unilateral notice where the registered proprietor does not

¹¹ Rule 80 of the LRR 2003
consent to the notice. To enter a unilateral notice, the applicant does not have to satisfy the registrar that he has a valid claim to an interest, merely that he claims an interest which is capable of being protected by a notice.

2.11. After entry of the unilateral notice, the Land Registry will notify the registered proprietor about it and the proprietor can apply for cancellation of the notice under s. 36(1). If the beneficiary of the notice objects to its cancellation, the Registrar can remove the notice if he considers the objection to be groundless but otherwise will refer the dispute to the First-tier Tribunal (Property Chamber Land Registration).¹²

Home Rights Notices

2.12. Under s. 30 of the Family Law Act 1996, spouses or civil partners in occupation of a matrimonial or civil partnership home owned by the other spouse/partner have a right not to be evicted or excluded from that home. If not in occupation, he/she has a right with leave of the court to enter and occupy the home. Those rights continue until the death of the other spouse/partner or the termination of the marriage or civil partnership, although the court can make an order that they should continue beyond the other spouse/partner's death or the termination of the marriage or civil partnership.¹³

2.13. Such rights are known as “home rights”, constitute a charge on the other partner’s interest¹⁴ and can be protected by agreed notices. They cannot be overriding interests even if the spouse/partner is in actual occupation of the property¹⁵ and so if not protected by a notice will not affect purchasers or chargees.

2.14. An application can be made to cancel a home rights notice under rule 87A of the LRR 2003 if the rights have come to an end. The applicant must show the reason why the rights have come to an end (e.g. death of one of the partners, termination of the marriage or civil partnership or voluntary release of the rights). When a vendor contracts to sell a dwelling house with vacant possession which is subject to a home

¹² Until 1.7.13 disputes were referred to the Adjudicator to HM Land Registry but that that office has now been absorbed into the First-tier Tribunal.
¹³ Such an order can only be made while the marriage or civil partnership still subsists.
¹⁴ S. 31(1) of the Family Law Act 1996
¹⁵ S. 31(10(b) of the Family Law Act 1996
rights charge, a provision is implied that the vendor will procure the cancellation of the entry before completion.¹⁶

2.15. Registration of a home rights notice by a spouse/civil partner who is not in occupation and has no intention of going into occupation, in order to frustrate a sale, is an abuse and can be set aside. See Bassett v Hassett [1981] 1 WLR 1385 and, before the Adjudicator, Barnes v 82 Cecilia Road Ltd (REF/2011/1045).

Power of the court to order vacation of a notice

2.16. Under the Land Registration Act 1925, the High Court would exercise its inherent jurisdiction to order the vacation of an entry in the register in an appropriate case.¹⁷ It appears that there is the same jurisdiction under the LRA 2002; see e.g. UCB Group v Hedworth [2004] EWHC 1138 (Ch). The county court, being a creature of statute without an inherent jurisdiction, probably does not have such a power, but it could injunct the beneficiary of the notice to withdraw it.

2.17. Under s. 77, there is a duty not to apply for, or object to an application for, a notice without reasonable cause. Damages are recoverable for breach of that duty.

3. Restrictions

3.1. The priority of some interests, most notably beneficiaries’ interests under trusts of land, cannot be protected by notices. Those interests can be protected, to a greater or lesser degree, by restrictions instead. The entering of a restriction does not confer priority, but it may do so indirectly by preventing the registration of a disposition which would obtain priority if it were to be registered.

3.2. A restriction is “an entry in the register regulating the circumstances in which a disposition of a registered estate or charge may be the subject of an entry in the register”.¹⁸ The range of restrictions is wide from those that prevent the registration of a disposition at all to those that merely require a certificate that notice of the disposition has been given to a named individual. Sch. 4 of the LRR 2003 contains a set of

---

¹⁶ Family Law Act 1996, s. 32
¹⁷ Heywood v BDC Properties Ltd (No. 2) [1964] 1 WLR 267
¹⁸ S. 40(1)
standard form restrictions covering a variety of situations and it is those forms of restriction that are usually, but not invariably, used.

Conditions for entry of a restriction

3.3. The registrar may enter a restriction in the register if it appears to him necessary or desirable to do so for any of the following three purposes:

(a) to prevent invalidity or unlawfulness in relation to dispositions of a registered estate or charge,
(b) to secure that interests, which are capable of being overreached on a disposition of a registered estate or charge, are overreached, and
(c) to protect a right or claim in relation to a registered estate or charge.¹⁹

3.4. An example of the first purpose would be where a public body or a corporation has limited powers; in such a case the registrar may enter a restriction to reflect those limitations. The second purpose, of course, is to deal with the sale of land that is subject to a trust, to ensure that the trust is overreached on a sale. It is provided by s. 27 of the Law of Property Act 1925 that a trust of land will only be overreached if the purchase monies are paid to at least two trustees or a trust corporation. Hence probably the most common form of restriction is one in Standard Form A which reads:

“No disposition by a sole proprietor of the registered estate (except a trust corporation) under which capital money arises is to be registered unless authorised by an order of the court”.

Where the registrar registers two or more persons as proprietors of a property, he must enter a Form A restriction unless satisfied that they hold the properties as beneficial joint tenants.²⁰

3.5. The registrar can also enter a Form A restriction on the application of a person with an interest or a claim to an interest in a registered estate held under a trust of land, where a sole proprietor or the survivor of joint proprietors could not give a valid receipt for capital money. This is an illustration of the power to enter a restriction under (c) above. If such an application is met with an objection by a registered proprietor disputing the existence

¹⁹ S. 42(1)
²⁰ S. 44(1) and r. 95(2)(a) of the LRR 2003. This is one of the circumstances in which the Land Registry must enter a restriction but there are others such as in respect of a bankruptcy petition under s. 86(2).
of the trust, the dispute will be referred to the First-tier Tribunal (unless the registrar considers the objection to be groundless). Such disputes arise frequently where one of two former partners (of the domestic sort) claims an interest in the other partner’s property under a constructive trust. The task undertaken by the First-tier Tribunal in such cases is usually to decide whether the applicant has an interest in the property under a trust, not merely whether she or he has an arguable claim to an interest; see *Jayasinghe v Liyanage* [2010] EWHC 265 (Ch), [2010] 1 WLR 2106.

3.6. Form A restrictions are helpful in securing that a purchaser buys free of any trust interests but may be less helpful from the point of view of a beneficiary who is not a legal owner and wishes to ensure that the property is not sold without his or her knowledge. So other forms of restriction may be sought by such a person, including a Form II restriction that requires the disponee to certify that notice has been given to the beneficiary of the restriction before a disposition can be registered.

Who may apply for a restriction

3.7. An applicant for the entry of a restriction who is neither the registered proprietor nor entitled to be registered as proprietor must, unless he has the consent of the registered proprietor, show “a sufficient interest in the making of the entry”. Rule 93 of the LRR 2003 lists classes of persons who will be regarded as having a sufficient interest in applying for a restriction but it is not intended to be exhaustive. For a discussion of what amounts to a sufficient interest in applying for a restriction in a factually unusual case, see *Republic of Croatia v Republic of Serbia* [2009] EWHC 1559 (Ch) concerning a dispute between Croatia and Serbia over a flat in Kensington.

The terms of the restriction

3.8. As mentioned above, there are various prescribed standard forms of restriction intended to cover different situations, some of them more useful than others. For example, a person, who is entitled to the benefit of a charging order over an interest under a trust, can enter a restriction to protect that charging order. Because the charge applies only to a beneficial interest, any sale of the land is likely to overreach the interest subject to the charging order, so a judgment creditor with a charging order will want to know about such a sale in advance. The prescribed form of restriction, Form K, is arguably of little

---

21 S. 43(1)
value, because it merely requires that no disposition of the registered estate or charge is to be registered unless the disponee certifies that written notice was given to the person with the benefit of the charging order. As this can be done after the disposition, the notice required by Form K may be of limited value except to alert the judgment creditor to the need to pursue the proceeds of sale.

3.9. The standard form restrictions are not the only kind that the registrar can enter but someone seeking a non-standard form of restriction must satisfy the registrar:
(a) that the terms of the proposed restriction are reasonable, and
(b) that applying the proposed restriction would—
   (i) be straightforward, and
   (ii) not place an unreasonable burden on the registrar.  

Restrictions and notices

3.10. By s. 42(2), a restriction cannot be entered under s. 42(1)(c) for the purpose of protecting the priority of an interest which is, or could be, protected by the entry of a notice. That is not to say, though, that it will never be appropriate to enter both a restriction and a notice. For example, a person who has obtained a freezing order to protect claim to land may be able to enter a notice in respect of that interest as well as a restriction to reflect the terms of the freezing order. Similarly, a right of pre-emption may be protected by a notice to secure priority against a third party purchaser but it may also be the subject of a restriction by which no disposition could be registered without the written consent of the party with the benefit of the right.

The Court’s powers

3.11. Not only the registrar but also the court may order the entry of a restriction if it appears to the court that it is necessary or desirable to do so for the purpose of protecting a right or claim in relation to a registered estate or charge. As in applications directly to the Land Registry, the Court cannot order the entry of a restriction for the purpose of protecting the priority of an interest which is, or could be, the subject of a notice. The Court has the useful power, under s. 46(3) to order that the restriction is to have priority over any priority search outstanding at the date of the order.
3.12. Just as with notices, the High Court has an inherent jurisdiction to order the vacation of a restriction from the register.

Removing restrictions from the register and disapplying them

3.13. Restrictions already on the register can be removed in various ways, as well as on an order of the court. They can be withdrawn through an application made under s. 47 consensually, unless the restriction is a mandatory one. They can be cancelled on application if the registrar can be satisfied that the restriction is no longer required.24 The registrar has the power to cancel a restriction without application to bring the register up to date or remove a superfluous entry. For example, if a restriction was entered to reflect the limited powers of the proprietor to deal with the property and that proprietor disposes of it to someone not under any such limitation, the registrar may cancel the restriction without any application being made.

3.14. There is also a power under s. 41(2) for the registrar to disapply or modify a restriction. An example might be where a restriction prohibited the registration of a disposition without the consent of an individual who cannot be traced. On being satisfied of the steps taken to trace the individual and that there is no other reason not to register the disposition, the registrar can disapply the restriction and register the disposition.

3.15. As with notices, there is a duty under s. 77 not to apply for, or object to an application for, a restriction without reasonable cause, breach of which sounds in damages.

Daniel Gatty
Hardwicke
November 2013

**Daniel Gatty** practises at Hardwicke, specialising in property law and property related professional negligence. His recent cases include *The Mortgage Business v O'Shaughnessy* [2012] 1 WLR 1521 and *Franks v Bedward* [2012] 1 WLR 2428 both of which (coincidentally or not) concerned priorities in registered land, the topic of his talk. Daniel sits part-time as a Judge of the First-tier Tribunal (Property Chamber Land Registration).

---

Contact us

Daniel Gatty
020 7242 2523
daniel.gatty@hardwicke.co.uk

www.hardwicke.co.uk/people/gatty-daniel

Practice Management Team
Paul Horsfield
020 7242 2423
paul.horsfield@hardwicke.co.uk

Annabelle Lock
020 7242 2523
annabelle.lock@hardwicke.co.uk

Sana Naman
020 7242 2523
sana.naman@hardwicke.co.uk