

**THE LONDON BOROUGH OF HARINGEY
(HIGH ROAD WEST PHASE A) COMPULSORY PURCHASE ORDER 2023**

**SECTION 226(1)(A) AND S226(3)(A) OF THE TOWN AND COUNTRY PLANNING ACT
1990**

**SECTION 13 OF THE LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT
1976 AND**

THE ACQUISITION OF LAND ACT 1981

STATEMENT OF CASE

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1. INTRODUCTION

- 1.1 The London Borough of Haringey ("**the Council**") made The London Borough of Haringey (High Road West Phase A) Compulsory Purchase Order 2023 ("**the Order**") pursuant to section 226(1) (a) of the Town and Country Planning Act 1990, s226(3)(a) of the Town and Country Planning Act 1990 ("**the 1990 Act**"), section 13 of the Local Government (Miscellaneous Provisions) Act 1976 ("**the 1976 Act**") and the Acquisition of Land Act 1981.
- 1.2 The Order has been submitted to the Secretary of State for Levelling Up, Housing and Communities ("**the Secretary of State**") for confirmation.
- 1.3 This document is the Statement of Case for the Order, the purpose of which is to justify and clearly set out the reasons for making the Order, and to respond to the objections made to the Order ("**the Objections**"). This Statement of Case has been prepared in compliance with the Ministry of Levelling Up, Housing and Communities' "Guidance on Compulsory Purchase Process and The Crichel Down Rules" July 2019 ("**the 2019 Guidance**").
- 1.4 This Statement of Case is a statement under Rule 7 of the Compulsory Purchase by Non-ministerial Acquiring Authorities (Inquiries Procedure) Rules 2007 and the Council reserves the right to alter or expand it as necessary for the purposes of Rule 7.
- 1.5 The Council's purpose in making the Order and seeking its confirmation by the Secretary of State is to enable the Council to acquire compulsorily the land and the new rights over land included in the Order ("**the Order Land**") in order to facilitate the delivery of the first phase ("**Phase A**") of the comprehensive residential-led mixed use regeneration of the High Road West area in Tottenham, London ("**the Regeneration Scheme**"). The scheme to be carried out on the Order Land ("**the Scheme**") will deliver Phase A of the Regeneration Scheme and is to be undertaken in the southern part of the High Road West area. The Scheme is described in section 5 of this Statement. It comprises delivery of plots A-G within planning permission HGY/2021/3175 ("**the Planning Permission**"). Plots H-N of the Planning Permission form the second phase of the Regeneration Scheme to be undertaken in the northern part of the High Road West area ("**Phase B**").
- 1.6 If confirmed by the Secretary of State, the Order will enable the Council to acquire compulsorily the land and new rights included in the Order for the purposes of delivering the development comprised in the Scheme.
- 1.7 The map to the Order ("**Order Map**") identifies the land proposed to be acquired (coloured pink) and the land on, over or under which new rights are to be created and acquired (coloured blue).
- 1.8 The schedule to the Order ("**Order Schedule**") lists owners, lessees, tenants and occupiers of the Order Land, so far as known. In addition, it lists other parties with a qualifying interest in the Order Land as defined by section 12(2) Acquisition of Land Act 1981.
- 1.9 Over 80% of the freehold interest in the Order Land is owned by the Council. This includes the Love Lane Estate which occupies the majority of the Order Land and which is located to the south of White Hart Lane, between the railway line and the High Road, and which includes 297 residential properties, and an area to the west of the railway tracks on which 100 Whitehall Street and the Whitehall & Tenterden Community Centre are situated. The Order Land also comprises Nos 731 to 759 High Road to the east of the Love Lane Estate, and surrounding areas over which new rights are sought.
- 1.10 The Council has been in negotiation for the acquisition of third-party leasehold interests on the Love Lane Estate since 2014, and to date has acquired 44 of the 85 interests on the Love Lane Estate. CBRE, Lendlease's appointed property surveyors, commenced negotiations for the acquisition of all other third-party freehold and leasehold interests in the Order Land in January 2018, which has resulted in the acquisition of 2 of the freehold interests on the High Road. Notwithstanding the extent of the Council's ownership of the Order Land and despite years of negotiations, the only way to ensure the timely delivery of the Scheme is via the Council's intervention and the use of its compulsory purchase powers.
- 1.11 The delivery of the Regeneration Scheme has been a key policy objective of the Council since adoption of the Tottenham Strategic Regeneration Framework in 2014.

- 1.12 The Regeneration Scheme proposals have been developed with residents, businesses and the wider community through multiple rounds of consultation dating back to 2012. A resident ballot on the Love Lane Estate was held in August / September 2021 in line with the requirements within the GLA Capital Funding Guide. In that ballot, the majority of participating residents on the Love Lane Estate voted in favour of the regeneration of the Love Lane Estate as part of the Regeneration Scheme.
- 1.13 The Scheme will deliver at least 1,350 new homes including 500 social rented units for existing and new residents, to meet Haringey and London's urgent housing need, with the phasing of the Scheme ensuring that the social rented units are delivered in the early sub-phases. The Scheme will reinvigorate the High Road, promoting economic growth, bringing long term career and job opportunities and training opportunities for local people, and creating high-quality public realm including a new public square. The square will be part of an improved link between White Hart Lane station and the Tottenham Hotspur Football Club ("**THFC**") Stadium. These new spaces alongside new community uses including a new Library and Learning Centre, will be designed to promote community cohesion, safer neighbourhoods and better health and wellbeing for residents. The outcome of this will be the provision of much needed services and community facilities in what is currently one of the most deprived areas of London, and indeed the UK (further details are provided in Section 2.2). These non-residential elements of the Scheme are therefore crucial to the long-term success of the regeneration proposals.
- 1.14 The range of non-residential uses capable of being provided within the Scheme pursuant to the Planning Permission provides an opportunity to diversify employment and leisure opportunities and create a destination people will be drawn to, as well as providing much needed new homes in Tottenham, and a better range of services for local residents. As such, as well as the Scheme enhancing the social, environmental and economic wellbeing of the area, the Scheme will drive further investment and regeneration opportunities.
- 1.15 The Scheme will be delivered by the Council's development partner, Lendlease (High Road West) Limited ("**Lendlease**"), pursuant to a Development Agreement ("**the DA**"). The Scheme is proposed to be delivered through a phased programme of demolition and redevelopment as set out in Section 7.39-7.47 below.
- 1.16 This Statement of Case also sets out at Section 15 and Appendix 1 an outline of the Acquiring Authority's responses to the Objections.
- 1.17 The Council is satisfied that there is a compelling case in the public interest for the compulsory purchase of the Order Land and rights to deliver the Scheme, on the basis that the Scheme fits within the planning framework for the area, will make a significant contribution to the achievement of the promotion or improvement of the economic, social and environmental wellbeing of the area, and satisfies the other matters set out in Paragraph 106 of the 2019 Guidance.

2. **BACKGROUND & SCHEME EVOLUTION**

- 2.1 The Regeneration Scheme is located in North Tottenham, in the north-eastern part of the London Borough of Haringey. It is principally bounded by Tottenham High Road to the east and the railway line (including White Hart Lane Station (the "**Station**")) to the west.
- 2.2 For many years, North Tottenham has been ranked as one of the most deprived areas of the country. Per the 2019 Index of Multiple Deprivation (IMD), the North Tottenham areas of Haringey 037A and 037D LSOA are, respectively, within the top 10% and top 20% most deprived neighbourhoods in England¹. Key statistics include the following:-
- 2.2.1 The Tottenham constituency has the third highest level of overcrowded homes in the UK, with 20.5% of households overcrowded.²

¹ Source: ONS, English indices of deprivation 2019. The IoD2019 is comprised of seven distinct domains of deprivation which, when combined and appropriately weighted, form the IMD2019. These are income, employment, health deprivation and disability, education, skills and training, crime, barriers to house and services, and living environment.

² Source: House of Commons, Overcrowded housing England, 2021.

- 2.2.2 North Tottenham has very high unemployment rates, stated to be nearly double the borough and London average as of the 2021 census.³ There are also high rates of claimants for Universal Credit, Job Seekers Allowance, and other job-related benefits.⁴
 - 2.2.3 The average life expectancy of a man living in North Tottenham is around four years lower than the borough average, and over seven years lower than the average in some wards in the west of the borough.⁵
 - 2.2.4 A child in North Tottenham is approximately 60% more likely to be living in poverty than the borough average.⁶
 - 2.2.5 North Tottenham has a rate of anti-social behaviour and crime that is almost double the borough average, and Haringey is one of the top ten boroughs for serious youth violence in England.⁷
- 2.3 In light of this, the Council has long held objectives to bring meaningful change to the area for the benefit of residents and businesses.
- 2.4 In 2011, a Tottenham-wide consultation took place ("Have your say on Tottenham's Future"), which highlighted the community's desire to see the creation of socio-economic opportunities such as jobs and training provision, the provision of high-quality homes, safe and healthy public spaces and new business opportunities for people living and working in the area.
- 2.5 The following paragraphs summarise how the Regeneration Scheme was developed in response to these priorities.
- 2.6 **High Road West Masterplan**
- 2.7 In February 2012, the Council's Cabinet agreed that a masterplan should be prepared to guide future change in the High Road West area. The Council envisaged that the masterplan would support the creation of new homes, jobs and public space for the benefit of the community. A number of key principles for change were agreed for further consultation with the residents, businesses and the wider community, informed by earlier consultation and analysis of the area. These key principles included:
- 2.7.1 phased redevelopment and improvement focused on enabling existing residents to stay in the area in better quality homes;
 - 2.7.2 expanding housing choice and supply;
 - 2.7.3 fostering the growth of new and existing businesses in appropriate locations and, where moves are necessary, supporting firms to remain in the borough;
 - 2.7.4 increasing jobs; and
 - 2.7.5 sustainable development with access to new public spaces for community and cultural events.
- 2.8 Core to the development of the masterplan was early public consultation on three masterplan options for the High Road West area. All three options showed partial or complete demolition of the Love Lane Estate and varying levels of intervention to provide different levels of new housing, facilities, businesses and jobs, responding to the community's priorities. Option 1 proposed the redevelopment of two of the existing residential blocks within the Love Lane Estate, Option 2 proposed the redevelopment of six of the existing residential blocks within the Love Lane Estate, and Option 3 proposed the redevelopment of the entirety of the Love Lane Estate. The redevelopment of No's 731-759 High Road was included in all three options in order to facilitate the delivery of a new public space linking the improved Station to the new THFC Stadium, which was considered integral

³ Source: ONS Census 2021.

⁴ Source: DWP/MYE, 2019

⁵ Source: OHID, based on ONS data, 2016-2020

⁶ Source: Ministry of Housing, Communities & Local Government, 2019

⁷ Source: MPS Rate of all crimes per 1,000 population, January 2018 to December 2019.

to ensuring the delivery of more opportunities to local people and the creation of better accessibility and a safer environment for residents, businesses and stadium visitors. The three masterplan options were published for public consultation between April and June 2013.

- 2.9 A further option which considered only refurbishment of the Love Lane Estate had been discounted at an early stage, as it was clear that this would not meet the local community's or Council's aspirations for change in the area. Simply refurbishing the existing residential buildings would not deliver the level of jobs and training opportunities, the community and leisure facilities, the increased housing choice and supply that the community and planning policy required, nor the new link and the creation of a new public open space between the Station and the THFC Stadium.⁸
- 2.10 Responses to the 2013 public consultation clearly demonstrated that residents were supportive of significant change in the High Road West area. Option 3, which suggested the most comprehensive redevelopment of the Love Lane Estate, was favoured both by Love Lane residents and residents in the wider community.
- 2.11 Following the above, in November 2013, the Council's Cabinet approved plans to develop a comprehensive masterplan based on the community's feedback and agreed that further public consultation should take place with local residents and businesses to develop that masterplan.
- 2.12 The Council carried out this further extensive public consultation with residents, businesses and the wider community between September and October 2014. As part of that consultation the Council sought opinions on the key themes within the masterplan, including overall design, housing, business and open spaces.
- 2.13 The response to the consultation is summarised below:⁹
- 2.13.1 70% of respondents from the Love Lane Estate agreed that the Love Lane Estate should be demolished and homes replaced;
 - 2.13.2 81% of respondents agreed with the principle – 'All new homes should have access to private open space such as balconies, gardens and shared courtyards';
 - 2.13.3 79% of respondents agreed with the principle – 'There should be a community hub (with library, learning, community and business space) and this should be built on the High Road and in the new public square, Moselle Square, so it is accessible for all'; and
 - 2.13.4 91% of respondents agreed with the principle – 'The High Road should remain the main shopping area and should have improved shop frontages and public spaces'.
- 2.14 In December 2014, the Council's Cabinet considered the feedback from this extensive and wide-ranging consultation and approved the High Road West Masterplan Framework ("**HRWMF**"). The HRWMF reflects residents' desire (both within the Love Lane Estate and in the wider community) for comprehensive redevelopment, as demonstrated in the consultation feedback. The HRWMF sets out the vision for High Road West which is to create a vibrant, attractive and sustainable neighbourhood. It established the parameters and key principles for change in High Road West based on existing policy and best practice that would guide future development proposals.
- 2.15 **Tottenham Strategic Regeneration Framework**
- 2.16 Alongside the development of the HRWMF, in March 2014, the Council adopted the Tottenham Strategic Regeneration Framework ("**SRF**"). The SRF sets out a landmark 20-year vision for the future of Tottenham and how local people's priorities could be achieved through long-term regeneration. The SRF had been developed through an extensive community engagement programme ("**Tottenham's Future**") which ran from October 2013 to February 2014, with over 3,700 people consulted including residents, businesses and the wider community.

⁸ [High Road West Cabinet Report – 16 December 2014 \(haringey.gov.uk\)](http://haringey.gov.uk)

⁹ [High Road West 2014 Consultation Feedback Report \(haringey.gov.uk\)](http://haringey.gov.uk)

- 2.17 The SRF identifies a need to deliver 10,000 new homes and 5,000 new jobs in Tottenham within 20 years. North Tottenham and the High Road West area are identified as providing the opportunity to contribute significantly to these growth targets.
- 2.18 The High Road West and Tottenham Hotspur area is identified as a key character area within the SRF. The SRF notes that the High Road West regeneration area is "*in an area that is undergoing exciting change. The ambitions are to create a new residential neighbourhood alongside a strong focus on place making, leisure opportunities and commercial developments.*"
- 2.19 **Tottenham Area Action Plan 2017 ("TAAP")**
- 2.20 The TAAP was adopted in 2017 following public consultation. It sets out the planning framework for the Tottenham area, including High Road West. It sets out the Council's vision to regenerate Tottenham (and deliver 10,000 new homes together with 5,000 new jobs).
- 2.21 High Road West is identified as a Site Allocation in the TAAP (Ref: NT5). The TAAP sets out the requirements of the Site Allocation. Development is required to create a new residential-led mixed use development with increased housing choice and supply, with a minimum 1,400 new homes of a mix of tenure, type and unit size (including the re-provision of existing social rented council homes, the offer of alternative accommodation for secure tenants, and assistance in remaining within the area for resident leaseholders from the Love Lane Estate).
- 2.22 Further detail regarding Site Allocation NT5 is set out in Section 6 below.
- 2.23 **Procurement of a development partner**
- 2.24 In December 2015, the Council's Cabinet resolved that the best way to deliver the objectives for High Road West was to procure a development partner. The Competitive Dialogue procedure under the Public Contract Regulations 2015 was initiated in May 2016.
- 2.25 The procurement process concluded in 2017 with the selection of Lendlease as the Council's preferred development partner.¹⁰ On 20 December 2017, the Council and Lendlease entered into the DA, alongside a CPO indemnity agreement ("**the CPOIA**") to facilitate the delivery of the Regeneration Scheme. More information on the DA is provided in section 7 of this Statement.
- 2.26 **Review of scheme and progress to planning**
- 2.27 In 2018 the Council and Lendlease commenced a further round of public consultation with residents, businesses and the wider community on the detailed proposals for the Regeneration Scheme. The consultation was paused in late 2018, so that the proposals could be reviewed with the aim of increasing the number of social rented homes to be delivered as part of the Regeneration Scheme, in order to better support the new political and strategic Council priorities, which would require additional funding. At the same time, the GLA introduced the Mayor's Ballot Funding condition, which required the Council to undertake a ballot on the Love Lane Estate to secure/draw down GLA funding.
- 2.28 In March 2021, the Council's Cabinet approved a GLA sourced funding package which totalled £91,512,000 (ninety-one million, five hundred and twelve thousand pounds) consisting of £70,312,000 (seventy million, three hundred and twelve thousand pounds) of Affordable Housing Grant and £21,200,000 (twenty-one million two hundred thousand pounds) of Mayor's Land Fund.
- 2.29 Several rounds of consultation then took place between February and September 2021. This included consultation with Love Lane residents on the High Road West Local Lettings Policy and Love Lane Leaseholder Offer, alongside engagement on the Council's proposed commitments to non-secure tenants living in temporary accommodation on the Love Lane Estate, which together formed the basis of the Love Lane Landlord Offer (the "**Landlord Offer**"). The Landlord Offer was sent to eligible residents in advance of the resident ballot in August and September 2021. Engagement also took place with residents, businesses and the wider community on the proposals for the Regeneration Scheme. More information on consultation and engagement is set out in section 3 of this Statement, and the housing guarantees in the Landlord Offer are set out in section 12.1 below.

¹⁰ [High Road West Cabinet Report – 15 December 2015 \(haringey.gov.uk\)](https://www.haringey.gov.uk/cabinet-reports/2015/15-12-2015)

2.30 Following a positive ballot result in September 2021 (in which 55.7% of the participating residents voted in favour of the regeneration of the Love Lane Estate as part of the Regeneration Scheme), on 2 November 2021 Lendlease submitted the application for the Planning Permission. The Planning Permission was granted on 31 August 2022.

3. **CONSULTATION AND ENGAGEMENT**

3.1 As explained within section 2 above, since 2012 the Council has worked with residents of the Love Lane Estate, local businesses, and other stakeholders and members of the local community to develop the regeneration proposals for High Road West.

A summary of the public consultation undertaken since 2012 is set out fully within the Statement of Community Involvement submitted by Lendlease alongside the application for the Planning Permission and in the Planning Officer's Report on that application.

3.2 This section sets out the key representations received during the public consultation process and information on how this has been taken into account in progressing the Scheme and the wider Regeneration Scheme.

3.3 **Love Lane Estate Residents – Housing Offer**

3.4 As is evidenced in the following paragraphs, residents on the Love Lane Estate have consistently shown support for the redevelopment of the Love Lane Estate as part of the wider comprehensive redevelopment of High Road West.

3.5 When consulted in 2013 on the three masterplan options for High Road West, 68% of the respondents from the Love Lane Estate supported the redevelopment of the entirety of the Love Lane Estate (Option 3 – see Section 2.15 above).

3.6 In responses to the Council's consultation in 2014 (pursuant to section 105 of the Housing Act 1985) 70% of secure tenants on the Love Lane Estate agreed that the Love Lane Estate should be demolished, and 86% of secure tenants agreed that more homes should be provided to increase housing choice. This support was reaffirmed in the positive resident ballot outcome in September 2021. Secure tenants, non-secure tenants and resident leaseholders were all eligible to vote in the ballot, in line with the requirements within the GLA Capital Funding Guide.¹¹

3.7 The Council has worked closely with residents to develop a housing offer which meets their needs and aims to keep the existing community together. The Resident Guides, consulted on in September and October 2014, were adopted by the Council's Cabinet in December 2014. For secure tenants, this included the commitment to a new home which met their needs in the redevelopment, or elsewhere in the borough if they preferred. Resident leaseholders were offered several rehousing options, including the opportunity to purchase an affordable home in the redevelopment or elsewhere in the borough or a leasehold swap. Private tenants were given assurances including timely rehousing advice, so that they were aware of all their options.

3.8 The Secure Tenant Guide put in place following consultation resulted in many residents exercising their choice to make a voluntary early move off the Love Lane Estate. As a temporary measure to make effective use of its housing stock and to mitigate the significant pressure on temporary accommodation in the borough and pending the Regeneration Scheme coming forward, the Council has used empty homes within the Love Lane Estate to accommodate homeless households in line with its rehousing duty under section 193 of the Housing Act 1996.

3.9 As of 2021, non-secure tenants in temporary accommodation were the largest resident group on the Love Lane Estate, with most non-secure tenants having lived on the Love Lane Estate over three years. The feedback from this group of residents was that they felt the existing community should be protected, and that these non-secure tenants should also benefit from the increased opportunities for housing, employment and training and other benefits that the Regeneration Scheme would deliver.

3.10 In response to this, the Council consulted on a High Road West Local Lettings Policy in February and March 2021. The policy proposed that non-secure tenants, alongside secure tenants, would be

¹¹ [GLA CAPITAL FUNDING GUIDE: Section Eight \(london.gov.uk\)](https://www.london.gov.uk/infrastructure/capital-funding-guide)

prioritised for the new Council homes within the Regeneration Scheme. The consultation took place with households on the wider housing register as well as tenants on the Love Lane Estate. Following significant support from most respondents, the policy was adopted by the Council in July 2021.

- 3.11 Alongside the Local Lettings Policy, the Council also consulted on and adopted a Love Lane Leaseholder Offer ("**the Leaseholder Offer**") in July 2021. See further details on the policy in section 12.1 of this Statement. The commitments within the Leaseholder Offer were captured within the Landlord Offer.
- 3.12 **Love Lane Estate Residents – Design and Procurement**
- 3.13 The Council and Lendlease have sought to develop the proposals for the Regeneration Scheme, specifically the design of the 500 new socially rented Council homes within the Scheme, through engagement with residents of the Love Lane Estate.
- 3.14 The Resident Charter ("**the Charter**") was developed between the Council and the Resident Adviser in 2013 and 2014. The Charter set out residents' aspirations for the key principles that should guide the Regeneration Scheme.
- 3.15 A Resident Design Panel ("**the Panel**") was established in 2015, supported by the Independent Tenant & Leaseholder Advisor, which created the Love Lane Resident Design Guide ("**the Guide**"). The Guide focused on the physical side of the Regeneration Scheme.
- 3.16 A group of tenants and leaseholders selected by the Panel were also involved in the procurement process of the Council's development partner between 2015 to 2017.
- 3.17 The first new homes to be delivered within Plot A of the Scheme are 100% social rented homes which will be provided to existing residents of the Love Lane Estate. These units have been developed in response to the Charter and Guide and through engagement with Love Lane residents. Residents have had the opportunity to visit other schemes, including Lendlease's Elephant Park scheme in south London, to better understand the quality and improvement in homes that will be provided.
- 3.18 The housing need assessment process, undertaken by the dedicated Rehousing Team within the Council, will identify any adaptations that an individual household requires which will be arranged prior to the move to their new home. The homes will also have the appropriate number of bedrooms based on their assessed need, determined in line with the Council's Housing Allocation Policy 2015 (Revised 2021). Plot A will include wheelchair units, designed in compliance with part M4(3) of the Building Regulations, and future plots will provide policy compliant numbers.
- 3.19 The Council's Landlord Offer, which was the subject of the resident ballot in 2021, also contains commitments to residents around the new Council homes to be delivered. This includes a choice of interior designs, a range of living areas and kitchen layouts. In response to feedback from residents, further commitments within the Landlord Offer include the provision of substantial storage space (particularly within kitchens) and improved security features to access the respective buildings. The Landlord Offer also confirms that all existing households will have the option of a parking permit within the new development or on nearby roads.
- 3.20 Residents have expressed a preference for medium-rise blocks. The new social rented homes permitted pursuant to the Planning Permission at Whitehall Mews (Plot A) were originally intended to be up to 8 storeys but are now five and six storeys, responding to this preference. While it is not possible for the entire Scheme to consist of medium rise blocks, as this would fail to deliver the number of homes required pursuant to planning policy, it is the aim that replacement homes for existing residents will be predominantly located in the lower floors of the residential blocks.
- 3.21 A consistent theme in resident engagement has been the need for safe and accessible places for children to play and for family activities to take place. Play has been a key driver of landscape design across the Regeneration Scheme, with both formal play and exercise equipment proposed to be provided alongside incidental opportunities for play. The provision of communal gardens within the blocks has also been made with a view to providing secure and quieter spaces for residents and easy access to play for families.

- 3.22 The public square within the Scheme (Moselle Square) will be designed for active use by the community with provision for spatial programming and cultural activities, such as children's play, commercial and retail activities (including markets) and community activities including outdoor performances and events. This will complement its role in providing the improved connections between the Station and the High Road which the public square will make possible. Meanwhile uses and temporary play space will also be provided during the delivery period to support younger residents in being able to enjoy outdoor play in a safe and healthy environment.
- 3.23 Residents have also been consistent in their feedback through the consultation stages of the need for more opportunities for young people, better access to community services and more jobs and training in the local area. The proposals for the library and learning centre have been developed based on this aspiration and will continue to be progressed with the community as the Scheme is progressed, to ensure that it meets the requirements of local people both at the time of delivery and in future. Alongside this, the Scheme will create new jobs and training opportunities, with many ringfenced for local residents, and create significant expenditure in the local economy: see section 9 below.
- 3.24 **Business Owners**
- 3.25 High Road West contains a number of existing businesses across its area. Within the Scheme (comprising Phase A, as set out in Section 1), there are 15 businesses located within 15 commercial properties which front onto the High Road. These are occupied by a range of businesses, including restaurants and takeaways, retail, convenience stores, services and a GP surgery.
- 3.26 Business owners situated within and nearby the Regeneration Scheme have been consulted on the proposals from the outset. In both the 2013 and 2014 consultations, all businesses within the Regeneration Scheme and within a 300m radius received a newsletter/letter seeking their views. Two dedicated business drop-in sessions were held in each consultation exercise and one-to-one meetings also took place with various businesses potentially affected by the plans.
- 3.27 While consultation has shown some support from the wider business community for building new homes and bringing more opportunities to the area, there have consistently been concerns raised by those located within the Regeneration Scheme as to the impact on the future of their business if they were required to relocate. Feedback from businesses in consultation has reflected those concerns.
- 3.28 The Council and Lendlease have sought to address these concerns via contractual obligations contained in the Business Charter, CPOIA and section 106 Agreement as well as through the design of the Regeneration Scheme.
- 3.29 In 2014 the Council agreed a High Road West Business Charter (the "**Business Charter**"). This sets out four key commitments:-
- 3.29.1 ensure businesses are able to participate in the regeneration proposals and fully support businesses throughout the process;
 - 3.29.2 enable businesses to remain as viable as possible during the planning period and the subsequent regeneration, to enable individual traders to exercise real choice regarding their current and future options;
 - 3.29.3 a fair and equitable valuation and compensation process; and
 - 3.29.4 endeavouring to keep the businesses and jobs within the area or within the borough.
- 3.30 Lendlease is required to comply with the terms of the Business Charter by reason of the CPOIA entered into between it and the Council. As such, and following its appointment in 2017, Lendlease committed to align its objectives with the commitments within the Council's Business Charter.
- 3.31 Since 2018, Lendlease has sought to meet business occupiers on a one-to-one basis to discuss acquisition and relocation options (including within the Scheme).
- 3.32 Several dedicated business drop-in sessions have been held to provide business owners with the opportunity to understand the Regeneration Scheme such that they may plan the future of their

business accordingly. Lendlease and the Council have progressively discussed relocation options with business owners which most recently resulted in the circulation of the Business Support Leaflet to ensure that all affected businesses have been provided with information outlining the relocation options available and seeks further discussions with a view to establishing how the businesses can be supported through any relocation. Furthermore, one-to-one in person meetings continue to take place with many of the businesses (having been offered to all business operators).

3.33 Further information regarding the acquisition and relocation strategy in respect of the existing businesses located within the Scheme, including the commitments contained within the section 106 agreement entered into alongside the Planning Permission, is provided in section 12.2 of this Statement.

3.34 **Tottenham Hotspur Football Club (THFC)**

3.35 The THFC Stadium is situated on the eastern side of the High Road opposite the Scheme and Order Land. The THFC Stadium redevelopment was completed in 2019.

3.36 The redevelopment of the THFC Stadium was facilitated by The London Borough of Haringey (Northumberland Development Project) (No 1) Compulsory Purchase Order 2012 which authorised the Council to acquire certain land and rights to enable the construction and use of the THFC Stadium.

3.37 As well as owning the THFC Stadium, THFC owns property within Phase A and a number of parcels of land within Phase B.

THFC, as a significant landowner and occupier within North Tottenham, has been consulted on the redevelopment proposals for the Regeneration Scheme at each stage as it has progressed, with particular emphasis on the THFC Stadium's operational requirements in respect of the new route between the Station and the THFC Stadium.

3.38 THFC responded to the 2013 masterplan options consultation, stating its support for the principle of the masterplan as the first step towards a clear planning policy framework for the area. THFC stated its support for "Option 3" which sought to provide significantly improved housing for both existing and new residents, an opportunity to plan the new public realm more effectively, and to introduce an improved mix of community, recreational and commercial uses set within a high-quality public realm.

3.39 THFC also responded to the 2014 consultation on the HRWMF. THFC supported the general approach of the HRWMF and its design principles and highlighted a number of areas for further consideration. This included feedback relating to the vision, the new public square, the new Station entrance, the location of the community hub, the quantum of residential development, and street signage and place branding.

3.40 As part of the process to procure a development partner in April 2017, THFC were invited to meet each of the shortlisted bidders and present their vision for the area. The purpose of this was for the bidders to understand THFC's vision and key objectives when considering their illustrative masterplan framework for the Scheme. This presentation also importantly included information on design related access between the Station and THFC Stadium, which ensured the bidders were consistent with THFC's objectives.

3.41 Following selection by the Council, Lendlease has been in regular dialogue with THFC regarding the Regeneration Scheme overall and the Scheme. This has either been as part of the general consultation undertaken by Lendlease regarding the Regeneration Scheme, or, via more focused bilateral discussions between Lendlease and THFC.

3.42 These meetings have covered a wide range of topics, but particular areas of focus have included:-

3.42.1 Lendlease's capability, approach and vision to development – these discussions have included a site tour of the Elephant Park development site currently being delivered by Lendlease;

3.42.2 THFC's operational requirements in the context of the THFC Stadium and the Station;

- 3.42.3 the acquisition of THFC's landholdings within the Regeneration Scheme, and the potential for the Council to acquire the land required for the Scheme pursuant to a CPO;
 - 3.42.4 the emerging proposals for the illustrative masterplan prior to the submission of the planning application; and
 - 3.42.5 numerous issues relating to the application for planning permission which has subsequently been granted by the Council, in particular, how the development permitted by the Planning Permission would ensure that THFC's operational requirements, particularly in respect of crowd flow, would be protected.
- 3.43 Notwithstanding the above, THFC objected to the planning application and has subsequently brought a claim for judicial review in respect of the Planning Permission. On 22 March 2023, following an oral hearing, Lieven J refused THFC's application for permission to apply for judicial review.

4. DESCRIPTION OF THE ORDER LAND AND SURROUNDINGS

- 4.1 The Order Land comprises approximately 4.2 hectares of mixed-use land within the High Road West area of which the Council owns the freehold interest in over 80%. It is predominantly occupied by the Love Lane Estate, which comprises 297 homes across ten residential blocks. The Order Land is bounded to the west by Love Lane, the Station and the railway line. To the east, the Order Land includes a row of terraced buildings, in mixed commercial and residential use, that front the High Road (Nos 731 to 759 High Road (odd numbers only)) and face the recently constructed THFC Stadium. The Order Land also comprises an area to the west of the railway line which contains 100 Whitehall Street and the Whitehall & Tenterden Community Centre (this area is referred to as "**Plot A**").
- 4.2 The boundary of the Order Land is shown edged red on the Order Map. The land-coloured pink identifies the land over which the Council seeks to compulsorily acquire third party interests ("**the Pink Land**") in order to deliver the Scheme. The freehold of the Love Lane Estate and Plot A is held by the Council. There are a number of third-party leasehold interests within the Love Lane Estate where residents have exercised the right to buy. The High Road properties are held under several third-party freehold interests. Of the commercial properties, 3 are owner occupied and 12 are let on commercial leases and assured shorthold tenancies.
- 4.3 The land-coloured blue identifies the land over which new rights over land are proposed to be created and acquired compulsorily ("**the Blue Land**") to facilitate the delivery of the Scheme. These rights are for crane oversailing, to erect and use scaffolding, carry out highway and landscaping works, and access. Further information on the rights sought over particular parts of the Order Land is provided below at Section 4.6 below.
- 4.4 The Pink Land includes:-
- 4.4.1 The Love Lane Estate built in the early 1960s and comprising 297 homes across ten blocks ranging from low-rise 4 storey blocks to 10 storey towers – the freehold of which is owned by the Council;
 - 4.4.2 Coombes Croft Public Library, located on the ground floor of Kathleen Ferrier Court, a 5-storey residential building within the Love Lane Estate – the freehold of which is owned by the Council;
 - 4.4.3 Nos 731 to 759 High Road (odd numbers only) comprising a 3-storey Victorian terrace with ground floor retail and residential on the upper floors;
 - 4.4.4 a small sub-station to the south of No 731 High Road;
 - 4.4.5 100 Whitehall Street, a two/three storey building of which one part is used for Stage One Temporary Accommodation for up to 22 households, and the remaining space comprising former community space – the freehold of which is owned by the Council;
 - 4.4.6 the site of the Whitehall and Tenterden Community Centre– the freehold of which is owned by the Council; and

4.4.7 all or parts of roads including Love Lane, Whitehall Street, Moselle Street, Moselle Place, William Street, High Road and White Hart Lane.

4.5 The table below sets out the blocks which comprise the Love Lane Estate alongside the current tenure and occupation of each block.

	Secure tenants	Non-secure tenants	Resident leaseholders	Non-resident leaseholders (some with private tenants in situ)	Voids	Total
Ermine House	7	35	2	1	15	60
Charles House	15	23	0	6	16	60
Moselle House	8	31	3	1	17	60
9-39 White Hart Lane	1	7	1	3	4	16
Kathleen Ferrier Court	2	9	4	2	2	19
2-32 Whitehall Street (evens)	0	3	2	2	9	16
3-29 Whitehall Street (odds)	2	8	2	2	0	14
31-61 Whitehall Street (odds)	0	12	1	2	1	16
63-89 Whitehall Street (odds)	1	10	2	0	1	14
2-28 Orchard Place	1	10	2	0	1	14
4-18 Brereton Road	0	5	2	1	0	8
Total	36	155	20	21	65	297

4.6 The Order makes provision for the following new rights to be acquired over the land shown shaded blue on the Order Map:-

4.6.1 parts of roads including Headcorn Road, Tenterden Road and Whitehall Street and area of land to the north of Whitehall Street – where, by reason of the current status of the roads, rights of access are sought with or without vehicles for all purposes;

4.6.2 land to the north and south of 100 Whitehall Street, part of Love Lane, part of White Hart Lane, land and properties on the north and south sides of White Hart Lane, part of William Street and properties to the east of William Street, and part of Brereton Road – where the right to swing the jib of a crane loaded or unloaded is sought to facilitate the delivery of the Scheme;

- 4.6.3 land and properties to the south, east and west of 9 -39 White Hart Lane – where rights are sought to access the land and erect and retain scaffolding and temporary hoarding for the purpose of constructing the Scheme on the adjoining land;
 - 4.6.4 land to the east of the railway line and land surrounding 100 Whitehall Street and Whitehall and Tenterden Community Centre – where rights are sought to access the land and erect and retain scaffolding and temporary hoarding and demolish and re-build any structures for the purpose of constructing the Scheme on the adjoining land; and
 - 4.6.5 land surrounding 100 Whitehall Street and Whitehall and Tenterden Community Centre and part of Whitehall Street (west of the railway line) – where rights are sought to access the land to carry out landscaping and road works.
- 4.7 Full details of the ownership of each interest in the land and the new rights comprised in the Order are contained in the Order Schedule. In respect of the Pink Land the Council is seeking the power to acquire all interests in the land unless expressly stated in the Order Schedule.

5. **DESCRIPTION OF THE SCHEME**

- 5.1 The Scheme constitutes the comprehensive mixed use residential-led redevelopment of the Order Land.
- 5.2 The Planning Permission grants planning consent for the entire Regeneration Scheme, including the Scheme, namely:-
 - 5.2.1 An outline component comprising demolition of existing buildings and creation of new mixed-use development including residential (Use Class C3), commercial, business & service (Use Class E), business (Use Class B2 and B8), leisure (Use Class E), community uses (Use Class F1/F2), and Sui Generis uses together with creation of new public square, park & associated access, parking, and public realm works with matters of layout, scale, appearance, landscaping, and access within the site reserved for subsequent approval; and
 - 5.2.2 A detailed component comprising Plot A including demolition of existing buildings and creation of new residential floorspace (Use Class C3) together with landscaping, parking, and other associated works.
- 5.3 The planning application submitted for the Planning Permission was supported by a range of technical documents, including an Environmental Statement, Development Specification, Parameter Plans, Design Code, Transport Assessment, Arboricultural Impact Assessment, Economic Benefits Statement, Energy and Sustainability Statement and an Equalities Impact Assessment.
- 5.4 **The Scheme**
- 5.5 In respect of the Scheme, the Planning Permission grants consent for:-
 - 5.5.1 the delivery of between 127,500sqm and 156,500 sqm of residential floorspace, which equates to between 1,350 and 1,665 new homes;
 - 5.5.2 the provision of 40% affordable housing (by habitable room) which will include the provision of 500 social rented Council homes including replacement homes for existing residents on the Love Lane Estate;
 - 5.5.3 a new Library and Learning Centre which will include enterprise and business space, adult learning facilities, a children's library and flexible spaces for community and cultural activities, and which will be the subject of an architectural design competition;
 - 5.5.4 a new public square of a minimum of 3,500 sqm (Moselle Square). The new square will provide a range of benefits for the community, including leisure and social spaces and capacity for events, markets, and other activities, as well as providing a more spacious and appropriate access to and from the Station and the THFC Stadium;

- 5.5.5 a District Energy Network to serve the Scheme and which has the capacity to serve other buildings including potentially those within Phase B;
 - 5.5.6 all new homes within the Scheme will be 'visitable' dwellings in line with Part M Volume 1 M4(1) of the Building Regulations;
 - 5.5.7 new communal residents' amenity space;
 - 5.5.8 a pedestrian link between Whitehall Street and Headcorn Road; and
 - 5.5.9 landscaping, amenity space and parking provision, including the provision of a green play street at Brereton Road and Orchard Place.
- 5.6 In addition, the Planning Permission provides for further non-residential space within the Scheme, with the precise quantum of this to be decided within the future reserved matters applications, including:-
- 5.6.1 new retail provision of a range of sizes and types to extend and enhance the existing provision on the High Road;
 - 5.6.2 new leisure uses and public realm including indoor sports and public houses creating a vibrant area;
 - 5.6.3 office space;
 - 5.6.4 new public realm (in addition to Moselle Square); and
 - 5.6.5 a new Health Centre (the current plans are to relocate the existing Health Centre located on the High Road within the Scheme).
- 5.7 **Plot A**
- 5.8 The Planning Permission grants detailed consent for Plot A.
- 5.9 The Planning Permission was amended via a non-material amendment on 10 February 2023 (reference HGY/2022/3937). The amendments related solely to Plot A and provided for, among other things, an increase in the number of social rented units within Plot A to 61 from 60.
- 5.10 Plot A consists of two residential blocks containing 61 residential dwellings. The dwellings will include a mix of 1 bed, 2 bed, 3 bed and 4 bed units. 4 of the units will be designed as wheelchair users' dwellings with the remaining 57 being wheelchair adaptable.
- 5.11 Pursuant to the terms of the section 106 Agreement dated 31 August 2022 entered into alongside the Planning Permission (the "**section 106 Agreement**") the 61 residential dwellings within Plot A will be provided as social rented units which will facilitate the first stage of re-housing of existing residents within the Love Lane Estate. The social rented homes will be allocated in line with the Council's High Road West Local Lettings Policy.
- 5.12 **Remainder of the Scheme**
- 5.13 The remainder of the Scheme is approved in outline. A Development Specification and a series of Parameter Plans and Design Code were approved as part of the Planning Permission. The Development Specification includes minimum and maximum floorspace areas while the Parameter Plans specify the proposed upper building scale limits, locations of the proposed uses and the areas of public realm.
- 5.14 An illustrative masterplan for the Regeneration Scheme, including the Scheme, was submitted alongside the planning application for the Planning Permission showing the illustrative development layout and overall development strategy.
- 5.15 In respect of the Scheme, the illustrative masterplan shows a mixed-use development comprising residential, leisure, commercial, office, business and local community uses with a new 0.35ha public

square and a new purpose built library and learning centre (1,659 sqm GEA) at its heart. The illustrative masterplan includes 1,486 dwellings (500 of which are social rented Council homes) spread across seven plots within buildings ranging between 5 and 29 storeys interwoven with purpose-built cycle lanes, landscaped public realm and accessible play spaces. Alongside the creation of new homes, the illustrative masterplan contains 1,838 sqm of indoor sports, recreation or fitness floorspace, office floorspace and 4,022 sqm GEA sqm of Class E(a-c) floorspace to facilitate the provision of active frontages and diverse retail and commercial offering to complement and act as an extension to the existing High Road district town centre uses including restaurants, food and beverage outlets and retail and commercial spaces.

5.16 The exact location and quantum of uses across the Scheme will be confirmed as reserved matters applications are determined in accordance with the approved technical documents. However, the Planning Permission permits the following.

5.16.1 A minimum of 127,500 and maximum of 156,500 sqm of residential floorspace, which equates to between 1,350 and to 1,665 new homes. By reason of the section 106 Agreement, at least 40% (by habitable room) of the new homes will be affordable homes, which includes the provision of 500 social rented Council homes;

5.16.2 a minimum of 2,150 sqm and a maximum of 8,000 sqm GEA of non-residential Class E(a-e) development;

5.16.3 a minimum of 500 sqm and maximum of 6,000sqm GEA of Class F space, which will comprise the new Library and Learning Centre required to be delivered within the Scheme by reason of the related section 106 Agreement; and

5.16.4 Up to:-

(a) 1,000 sqm GEA of Class E(f) floorspace;

(b) 2,150 sqm GEA of Class E(g) floorspace;

(c) 3,000 sqm GEA of sui generis floorspace for the provision of a public house;

(d) 3,000 sqm GEA of sui generis floorspace for the provision of a cinema; and

(e) a minimum of 3,500 sqm GEA public space comprising Moselle Square which will provide a direct link between the Station and the THFC Stadium.

5.17 The Scheme will make a significant contribution to the achievement of the promotion or improvement of the economic, social or environmental wellbeing of the area and respond to the long-standing issues facing the community in North Tottenham. This is described in section 9 of this Statement.

5.18 Section 6 of this Statement sets out further information about the relevant planning policies and compliance of the Scheme with the strategic planning framework.

5.19 **The Regeneration Scheme context**

5.20 As set out above, the Planning Permission grants consent for the whole of the Regeneration Scheme.

5.21 In respect of Phase B of the Regeneration Scheme, the Planning Permission grants consent for a range of uses. This includes between 50,000sqm – 124,500sqm GEA of residential floorspace which equates to approximately 540-1360 residential dwellings. Of these, a minimum of 40% (by habitable room) will be required to be provided as affordable pursuant to the terms of the section 106 Agreement. It also includes provision for new commercial, retail and floorspace, learning and community facilities, and open space (including in the form of a new public park).

5.22 **Status of the Planning Permission**

5.23 The Planning Permission was lawfully implemented in March 2023 by virtue of works undertaken within Plot A. The works followed the discharge of the relevant pre-commencement conditions, including: 3 (Phasing Plan), 4 (Construction Logistics Plan), 5 (Demolition/ Construction

Environmental Management Plans), 6 (Control of Dust), 7 (Non-road mobile machinery), 8 (Rail Protection), 10 (Ground Contamination), 11 (Arboricultural Method Statement), 24 (Highway Pre-condition Survey) and 88 (Business Community Liaison Group).

6. THE PLANNING FRAMEWORK AND PLANNING STATUS OF THE ORDER LAND

6.1 Tier 2, section 1, paragraph 104 of the 2019 Guidance requires that any programme of land assembly needs to be set within a clear strategic framework and that this is particularly important when acquiring land under section 226(1)(a) of the 1990 Act. It requires that the planning framework providing the justification for a CPO be as detailed as possible to demonstrate that there are no planning or other impediments to its implementation. Tier 2, section 1, paragraph 106 of the 2019 Guidance refers to the Secretary of State being expected to take into consideration whether the purpose for which the land is being acquired accords with the adopted Local Plan and the National Planning Policy Framework.

6.2 As set out within section 9 of this Statement, the compulsory purchase of the Order Land is required to deliver the Scheme, being the residential-led mixed use redevelopment of part of a key strategic site. For the reasons set out below the acquisition of the Order Land to facilitate the delivery of the Scheme (and by extension the wider Regeneration Scheme) would accord with the Development Plan and other policy and guidance, including the National Planning Policy Framework and National Planning Practice Guidance.

6.3 Planning Framework

6.4 There is a clear planning framework for the Scheme, which has been founded on an appropriate evidence base and has been the subject of consultation.

6.5 The following paragraphs summarise how a) the principle of the Scheme and b) the Scheme as permitted by the Planning Permission, meet key planning policy objectives of the strategic planning framework and how the purpose for which the Order Land is being acquired accords with the adopted Development Plan and the revised National Planning Policy Framework, as required by Tier 2 paragraph 104 bullet point 2 of the 2019 Guidance. A comprehensive appraisal of the Scheme as permitted by the Planning Permission in the context of all relevant planning policy is set out in the Officer's report to the Council's Planning Committee of 21 July 2022 and the associated addendum report of August 2022.

6.6 The Development Plan comprises:-

6.6.1 London Plan (2021);

6.6.2 Strategic Policies Development Plan Document (DPD) (2017) (formerly known as the Core Strategy);

6.6.3 Development Management DPD (2017);

6.6.4 Site Allocations DPD (2017); and

6.6.5 Tottenham AAP DPD (2017).

6.7 The key document within the Development Plan is the Tottenham AAP DPD which identifies the Order Land within Site Allocation NT5 (the Regeneration Scheme) and sets the principles for its redevelopment.

6.8 National planning policy is set out in the form of the adopted National Planning Policy Framework ("NPPF"), which was updated in July 2021. The NPPF is subject to updates by the Government and is supplemented by the National Planning Practice Guidance (NPPG) which is updated on a regular basis. Both of these documents carry significant weight.

6.9 Principle of the Scheme

6.10 The London Plan (2021) sets out the Mayor's spatial vision and overall strategic plan for London.

- 6.11 The vision, objectives and policies set out in the London Plan are underpinned by the principles of Good Growth which is described as "growth which is socially and economically inclusive and environmentally sustainable." As part of delivering Good Growth, the London Plan proposes more efficient use of land in the capital as part of improving the lives of existing and new Londoners. This means creating areas of higher density in appropriate locations, encouraging a mix of land uses and co-locating different uses to provide communities with a wider range of services and amenities.
- 6.12 As part of delivering Good Growth in appropriate locations, the London Plan also states that growth should be directed to the most accessible and well-connected places, making the most of the transport network across all modes. To this end, the London Plan states that all options for using the City's land more effectively should be explored, including the redevelopment of brownfield land and the intensification of existing places, including outer London. Through making the best use of land, the City is envisaged to grow in a way which works for all and will allow high-quality homes to be built and workspaces to be developed.
- 6.13 High Road West (which includes the Order Land) is identified within the Upper Lea Valley Opportunity Area in the London Plan. Policy SD1 of the London Plan states that the Mayor will support regeneration in Opportunity Areas and ensure that they deliver the maximum affordable housing and create inclusive and mixed communities. To this end, Part B of Policy SD1 states that boroughs, through development plans and decisions should: support development which creates employment opportunities and housing choice for Londoners; establish capacity for growth in Opportunity Areas; take into account the indicative capacity for homes and jobs in the London Plan; and include ambitious transport mode share targets. It should also support wider regeneration and ensure that development proposals integrate into the surrounding area.
- 6.14 Policy SP1 of the Strategic Policies DPD states that the Council will focus Haringey's growth in suitable locations, as part of meeting its minimum housing target of 19,802 new homes over the lifetime of the Plan (2011 – 2026); this includes High Road West amongst other strategic sites in North Tottenham, Wood Green and Tottenham Hale.
- 6.15 Policy DM55 of the Development Management DPD states that where development comes forward as part of an allocated site, the Council will require a masterplan to be prepared and accompanied by the proposal. In preparing a proposal, the Council expects the applicant to have engaged with landowners and occupiers on other parts of the allocated site, and where appropriate neighbouring boroughs. Supporting paragraph 7.38.9 states that particular projects which require masterplans, include Estate Renewal projects (including High Road West), where community consultation and co-ordination will be required.
- 6.16 Policy DM56 of the Development Management DPD states that the Council will support land assembly to achieve comprehensive and co-ordinated development. It will use Compulsory Purchase Order ("**CPO**") powers where necessary to assemble land for development in the borough where:-
- "Landowners and developers can demonstrate that they have:-
- (a) a viable, deliverable and Local Plan compliant scheme;
 - (b) have made all reasonable attempts to acquire, secure an option over the land needed through negotiation;
 - (c) comprehensive redevelopment of the assembled Site is required to meet the Site Allocation (including the requirements of a Masterplan were stated in the Plan); and
 - (d) the development proposed for the assembled site would contribute to the delivery of the Local Plan's objectives."
- 6.17 The TAAP was adopted in 2017 and sets out the Council's vision to regenerate Tottenham (including High Road West) and deliver 10,000 new homes together with 5,000 new jobs.
- 6.18 In order to achieve the vision, set out in the TAAP, Policy AAP1 outlines that the Council expects all development proposals to be brought forward comprehensively. To this end, development proposals

which form part of a site allocation within the TAAP will require a masterplan. Policy AAP2 also states that the Council will support site assembly to achieve comprehensive development.

- 6.19 High Road West is identified as a Site Allocation in the TAAP (Ref: NT5). The site allocation states the following proposals for High Road West:-

"Master planned, comprehensive development creating a new residential neighbourhood and a new leisure destination for London. The residential-led mixed-use development will include a new high quality public square and an expanded local shopping centre, as well as an uplift in the amount and quality of open space and improved community infrastructure."

- 6.20 A key tenet of the Site Allocation seeks the creation of a new residential neighbourhood through increased housing choice and supply, with a minimum 1,400 new homes of a mix of tenure, type and unit size (including the re-provision of existing social rented council homes, the offer of alternative accommodation for secure tenants, and assistance in remaining within the area for resident leaseholders from the Love Lane Estate). The Site Allocation also seeks increased and enhanced community facilities and social infrastructure, including a new library and learning centre alongside the provision of a new and enhanced public open space, including a high-quality public square.
- 6.21 The most recent revision of the National Planning Policy Framework (NPPF) was published on 20th July 2021. It sets out the Government's economic, environmental, and social planning policies. This is enshrined in Paragraph 8 of the NPPF which states *that "achieving sustainable developments means that the planning system has three over-arching objectives, which are interdependent and need to be pursued in mutually supportive ways..."* These are economic, social, and environmental.
- 6.22 In terms of compliance with the London Plan, the Scheme is located in an opportunity area, is allocated for development, is significantly underutilised and is adjacent to an upgraded railway station. It also contains a wide variety of potentially different uses alongside significant residential and the open space.
- 6.23 Turning to the policies at the local level, the Scheme represents the realisation of the Council and the community's long held ambition for the High Road West area.
- 6.24 As noted in section 2, the comprehensive redevelopment of the High Road West area, particularly the Love Lane Estate, has been a key focus for the Council since 2012. The adoption of the TAAP and allocation of the High Road West area as a site for comprehensive residential-led mixed use development marked the conclusion of a comprehensive consultation process.
- 6.25 The Scheme accords with policies within the Strategic Policies DPD directing development to North Tottenham and High Road West in particular. The Scheme is also part of a wider masterplan and planning consent according with the approach required for large scale development sites. As noted above, there has been significant consultation with local stakeholders including residents of the Love Lane Estate alongside landowners in the generation of the Redevelopment Scheme (of which the Scheme forms part), as policy requires.
- 6.26 With regard to local policy directly related to CPOs, the Scheme (as permitted by the Planning Permission) has been demonstrated to be deliverable and to be broadly compliant with the Development Plan. Section 12 of this Statement discusses the Council and Lendlease's attempts to secure vacant possession of the land within the Scheme, whilst the comprehensive redevelopment of the Order Land is critical to the delivery of the wider Site Allocation and the Local Plan more widely.
- 6.27 The TAAP builds on the requirements set out in the Strategic Policies DPD and again seeks comprehensive redevelopment to deliver the Site Allocation. The Scheme is part of a wider comprehensive redevelopment i.e. the Regeneration Scheme.
- 6.28 The Scheme is planned to deliver a large quantum of housing and affordable housing, new leisure uses alongside the new shopping opportunities, new open spaces, and new and improved community infrastructure such as the library and learning centre. As such, the principle of the Scheme aligns with the aspirations of TAAP while the Scheme as permitted by the Planning Permission has a high degree of conformity with the policies within the TAAP.

- 6.29 Taking the above into account, the principle of the Scheme is in accordance with the Development Plan and the Scheme will deliver significant economic, social and environmental improvements in accordance with the NPPF.
- 6.30 **The Scheme as permitted by the Planning Permission**
- 6.31 The Scheme is the delivery of the residential-led mixed use redevelopment of the Order Land.
- 6.32 The following paragraphs summarise how the Scheme as permitted by the Planning Permission and described in further detail at section 5 of this Statement accords with the adopted Development Plan and the revised National Planning Policy Framework.
- 6.33 **Residential use – including relevant policies for estate renewal and replacing social rented units**
- 6.34 The London Plan seeks to increase the number of homes across the capital, with a borough target of 15,920 new dwellings over the plan period (until 2028/29), equivalent to 1,592 dwellings per annum. Policy GG2 states that those involved in planning and development must enable the development of brownfield land, particularly in Opportunity Areas.
- 6.35 Policy H8 of the London Plan sets out the requirements for the loss of existing housing and estate redevelopment. Part A outlines that the loss of existing housing should be replaced with new residential development at an equivalent or higher density, with a minimum amount of floorspace equivalent to the existing provided.
- 6.36 Policy DM11 of the Development Management Plan and supporting paragraph 3.34 also outlines that the renewal of estates should re-provide housing on a habitable room basis to increase the capacity to rehouse families into suitable accommodation. This also acknowledges the need to 'cross-subsidise' renewal schemes, through the provision of market housing and shared ownership products which will simultaneously contribute towards creating mixed and balanced communities.
- 6.37 The TAAP sets a target to deliver 10,000 new homes within the AAP, including High Road West, which sets a minimum of 1,400 new homes in the Site Allocation (Ref: NT5) with a mix of tenure, type and unit sizes.
- 6.38 Chapter 5 of the NPPF seeks to significantly boost the supply of housing. Paragraph 6.30 of the NPPF states that in order to significantly boost housing supply, it is important that a sufficient quantum and variety of land can come forward where needed to meet specific housing requirements.
- 6.39 The Scheme delivers significant new housing on this large brownfield site in the Opportunity Area as required by the London Plan. The delivery of new housing significantly exceeds the existing number within the Order Land at a higher density. This equates to more housing by unit, by floorspace and by habitable room. Market housing and intermediate housing will also be introduced into the Scheme to deliver a mixed and balanced community. The Scheme accords with the housing policies of the London Plan.
- 6.40 The Scheme also accords with the requirements of the TAAP. The Scheme can deliver the minimum requirement of 1,400 homes for the Site Allocation as a whole including the required mix of unit tenures, types and sizes.
- 6.41 The Scheme's delivery of a significant increase in housing with a range of types and tenures also accords with the NPPF.
- 6.42 **Affordable Housing**
- 6.43 Policy H4 of the London Plan sets a strategic target of 50% for all new homes delivered in London to be genuinely affordable.
- 6.44 Policy H6 of the London Plan sets out the split of affordable tenures to be applied to residential development. This sets a split of 30% low-cost rented homes (either as London Affordable Rent or Social Rent), 30% Intermediate (London Living Rent or Shared Ownership) with the remaining 40% determined by the local authority.

- 6.45 Part E of Policy H8 of the London Plan states that the demolition of affordable housing (including estate regeneration proposals) will only be permitted where an equivalent amount of affordable housing floorspace is provided. Affordable housing that is replacing social rented accommodation should similarly be provided at social rent levels where a right to return is being facilitated.
- 6.46 TAAP Policy AAP3 states that the Council will expect affordable housing to be provided in accordance with Policy SP2 and DM13 with the exception of the tenure split which in the TAAP should be provided at 60% intermediate and 40% affordable rented accommodation. This is to rebalance the mix of tenure types in Tottenham which is currently dominated by a single tenure type.
- 6.47 In accordance with these policy requirements, the Scheme delivers a significant quantum of affordable housing units, replacing all the existing Love Lane Estate homes and increasing the current supply of social housing on the Order Land. The Scheme, as permitted by the Planning Permission, will also provide a minimum of 40% affordable housing (by habitable room) which could rise in the event of the receipt of further grant funding and the outcome of the various viability reviews required pursuant to the section 106 Agreement.
- 6.48 Although the delivery of at least 500 social rented Council homes technically means that the affordable housing to be provided within the Scheme pursuant to the Planning Permission favours social housing and moves away from the tenure split set out in the TAAP, the tenure split to be delivered by the Scheme is plainly justified as it facilitates rehousing of existing Love Lane Estate tenants as well as providing a material increase in the Council's housing stock. It also achieves the Site Allocation NT5 requirement of providing new homes for the existing secure Council tenants living on the Love Lane Estate, as well as new social rented homes for existing non-secure tenants on the estate.
- 6.49 **Town Centres**
- 6.50 Policy SD6 of the London Plan states that the vitality and viability of London's varied town centres should be promoted and enhanced by encouraging the delivery of diverse hubs which meet the needs of Londoners. Town centres should also be identified as locations for mixed-use or housing-led intensification to optimise residential growth potential which secures a high-quality environment and complements the local character and heritage assets.
- 6.51 Policy SP10 of the Strategic Policies DPD states that Town Centres, including the Local Shopping Centre at Tottenham High Road, will continue to be supported in providing core local shopping facilities and services.
- 6.52 Paragraph 86 of the NPPF states that policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.
- 6.53 The Planning Permission provides for a significant proportion of town centre type uses including leisure / retail. The Planning Permission also provides significant public realm improvements and social infrastructure such as Moselle Square and a new library and learning centre. This will realise the aspiration to extend the town centre into the Scheme, specifically around Moselle Square. These town centre uses are accompanied by significant residential development which provides a greater diversity of uses.
- 6.54 **Employment Uses**
- 6.55 Part C of Policy GG5 of the London Plan states that those involved in planning and development should plan for sufficient employment and industrial floorspace in the right locations and support economic development and regeneration. Policy E1 states that improvements for the provision of office floorspace of different sizes should be supported by the provision of new, refurbished and mixed-use development.
- 6.56 Policy SP8 of the Strategic Policies DPD seeks to ensure a strong economy whilst the TAAP seeks to deliver high quality workspace.
- 6.57 The Planning Permission grants consent for the provision of office floorspace and other complementary leisure and town centre uses which will contribute to job creation.

6.58 **Community, Leisure and Cultural Uses**

6.59 Policy HC5 of the London Plan states that proposals should identify and promote new, or enhance existing, locally distinct clusters of cultural venues and related uses, especially where they can provide an anchor for local regeneration and town centre renewal. In addition, Part A5 outlines that development in Opportunity Areas and large-scale mixed-use developments should include new cultural venues and/or facilities and spaces for outdoor cultural events.

6.60 Policy SP14 of the Strategic Policies DPD states that the Council will seek to improve health and well-being of existing and future residents through supporting the integration of community facilities and services in multi-purpose buildings. In addition, Policy SP15 outlines that the Council will safeguard and foster the borough's cultural heritage and promote cultural industries and activities through supporting the provision of new workspaces together with social and cultural venues to support cultural and leisure activities.

6.61 Policy DM41 of the Development Management Plan DPD states that proposals for new leisure and cultural uses will be supported in Local Centres where they are consistent with the size, role and function of the centre and its catchment; sustain and enhance the town centre network; and contribute towards the borough's spatial strategy.

6.62 Site Allocation NT5 requires the creation of new leisure, sports and cultural uses along with an increase and enhancement in the quality and quantity of community facilities and social infrastructure.

6.63 The Planning Permission grants consent for a variety of new leisure uses including the library and learning centre (which will include enterprise and business space, adult learning facilities, a children's library and flexible spaces for community and cultural activities), indoor sports facilities, retail and food and beverage space. These sit alongside the delivery of the new Moselle Square which will be the focus of the community, cultural and leisure uses. In addition, a new health centre can be accommodated within the Scheme.

6.64 **Design and Tall buildings**

6.65 Policy D3 of the London Plan states that all development must make the best use of land by following a design-led approach with high density development guided towards areas of good connectivity. Policy D4 also seeks high-quality and well-designed developments.

6.66 Policy SP11 of the Strategic Policies DPD requires development to enhance and enrich the borough's-built environment.

6.67 Policy D9 of the London Plan defines tall buildings, where tall buildings should be located and how the adverse impacts of tall buildings should be minimised. Policy SP11 of the Local Plan requires tall building proposals to be assessed against the criteria within the TAAP and the associated masterplan. The TAAP identifies the Site as being suitable for tall buildings.

6.68 Consultation during preparation of the Scheme has included the Quality Review Panel process.

6.69 The Scheme contains a number of buildings that fall within the policy definition of 'tall buildings'. As noted in section 3 of this Statement and more fully set out within the Design and Access Statement submitted in support of the application for the Planning Permission, the design process has been rigorous. The tall buildings approved pursuant to the Planning Permission were thoroughly appraised in the Heritage Townscape and Visual Impact Assessment submitted in support of the Planning Permission. Pursuant to Condition 40 of the Planning Permission, each reserved matters application for landscaping, layout, scale and appearance must conform with the approved Design Code, Development Specification and Parameters Plans. The requirement to comply with the approved Design Code provides design assurance and control as the outline component of the Scheme comes forward through detailed design.

6.70 **Transport**

6.71 The London Plan promotes car-free development and sustainable transport modes with a view to meeting the Mayor's strategic target of 80% of all trips made by foot, cycle or public transport.

Development should make effective use of land, reflecting its connectivity and accessibility by existing and future transport routes.

6.72 Policy SP7 of the Strategic Policies DPD states that the Council will work with its partners to deliver key transport and highway changes as part of tackling climate change, improve local place-shaping and public realm together with environmental and transport quality and safety.

6.73 Site allocation NT5 requires the creation of a new square connecting the Station with the new THFC Stadium.

6.74 Paragraph 102 of the NPPF states that development should take opportunities to promote walking, cycling and public transport use as part of the earliest stages of development proposals.

6.75 The Planning Permission provides for a limited quantum of parking associated for those rehoused residents from the Love Lane Estate. The remainder of residential and other uses will be car free and thus encourage more sustainable modes of transport. Moselle Square will also connect the Station to the THFC Stadium. In addition, there are a variety of cycling infrastructure improvements.

6.76 **Public Realm and Open Space**

6.77 London Plan Policy D4 includes standards for private outdoor space. London Plan Policy D8 promotes the need for well-designed public realm to create safe, accessible, inclusive, attractive and well-connected places. London Plan Policy S4 supports residential development or development likely to be used by children and young people to provide opportunities for play.

6.78 Policy DM20 of the Development Management DPD seeks to create new open spaces in areas of open space deficiency in line with the Haringey Open Space and Biodiversity Study (2013).

6.79 Policy AAP9 states that high priority will be afforded to enhance access through on-site provision of Tottenham Green Grid project in areas identified as deficient in access to open spaces.

6.80 Site Allocation NT5 requires the provision of a new and enhanced public open space including a high-quality public square.

6.81 The Planning Permission provides for a new public square of 3,500sqm – Moselle Square. This new amenity space will be a focal point of activity in the Scheme. In addition to this new piece of open space infrastructure, there will significant environmental improvements throughout the Scheme, including new streets, footpaths planting, and doorstep play.

6.82 **Energy**

6.83 The London Plan sets out that major development should be designed to be net zero-carbon in accordance with the energy hierarchy set out in Policy SI2. Policy SI3 also seeks to encourage and coordinate energy infrastructure for major developments such as this.

6.84 Policy SP4 of the Strategic Policies DPD states that the Council will promote and require all new developments to adopt measures to reduce energy use and carbon emissions during design. In accordance with Part 2 of Policy SP4, developments are required to assess, identify and implement site-wide and area-wide decentralised energy facilities including the potential to link into the wider network, where viable.

6.85 Paragraph 148 of the NPPF encourages proposals which support renewable and low carbon energy and associated infrastructure.

6.86 The Scheme will establish a District Energy Network to which the buildings within the Scheme will connect. Furthermore, the Scheme will achieve net zero for the residential uses in accordance with the Mayor's energy hierarchy.

6.87 **Planning Policy Summary Assessment**

6.88 In summary, the Scheme delivers on the key applicable policy requirements within the Development Plan. The acquisition of the Order Land will facilitate the delivery of the Scheme and by extension a significant number of national, strategic and local policy goals, including the delivery of:-

6.88.1 a new residential neighbourhood which increases housing choice and supply with a mix of tenure, type and unit size including the re-provision of all existing social housing;

6.88.2 new additional social housing;

6.88.3 new additional intermediate affordable housing;

6.88.4 new market housing;

6.88.5 the creation of a new public square that also creates a safer, more generous, more coherent connection from the Station to the Tottenham High Road and the THFC Stadium;

6.88.6 new retail provision to create an enhanced town centre and extend and enhance the provision on the High Road; and

6.88.7 providing a larger and enhanced Library and additional community space as part of a new Library and Learning Centre.

6.89 As noted at the start of this section of the Statement, paragraph 104 of the 2019 Guidance requires that any programme of land assembly needs to be set within a clear strategic framework and that this is particularly important when acquiring land under section 226(1)(a) of the 1990 Act. Paragraph 106 of the 2019 Guidance indicates that the Secretary of State will take into consideration whether the purpose for which the land is being acquired fits with the adopted Local Plan and the National Planning Policy Framework. For the reasons given in this section, it is the Council's position that the Secretary of State is able to confidently conclude that the purposes for which the Council proposes to acquire the land and rights included in the Order are set within a clear strategic framework and are in accordance with both the Development Plan and the relevant objectives of the NPPF.

7. **DELIVERY STRUCTURE AND FUNDING**

7.1 This section sets out how the Scheme will be delivered and funded.

7.2 On 20 December 2017 the Council and Lendlease entered into the DA to secure the delivery of the Regeneration Scheme. On the same date the Council and Lendlease entered into the CPOIA pursuant to which Lendlease undertook to indemnify the Council in respect of costs incurred in promoting, making and securing the compulsory acquisition of the Order Land and the compensation payments arising from those acquisitions.

7.3 The phased nature of the Scheme is reflected in the delivery arrangements, with leases for land required to deliver each phase, granted to Lendlease on the satisfaction of conditions. These are described further below.

7.4 For the reasons set out below, the Secretary of State is able to be satisfied that, following confirmation of the Order, the Scheme will be delivered.

7.5 As highlighted above, the proposed regeneration at High Road West is an important policy priority for the Council. The Council has worked with Lendlease to ensure that the necessary funding, approvals and consents and all other matters required for delivery of the regeneration proposals are in place.

7.6 **Lendlease**

7.7 The Scheme will be delivered by Lendlease.

- 7.8 Lendlease is a wholly owned subsidiary of Lendlease Europe Holdings Limited which is a wholly owned subsidiary of Lendlease Corporation Limited ("**Lendlease Ltd**"). Lendlease was incorporated in December 2017 with the express purpose of delivering the Regeneration Scheme.
- 7.9 Lendlease has been fully committed to delivering the Regeneration Scheme since entering in the DA. Lendlease continues to maintain that commitment.
- 7.10 Lendlease is the "developer" for the purposes of the DA and CPOIA. However, Lendlease Ltd entered into both agreements as guarantor. In its capacity as guarantor it has covenanted to deliver the Scheme on the same terms as Lendlease.
- 7.11 Lendlease Ltd is a globally integrated real estate and investment group with expertise in delivering complex and large scale regeneration schemes. It was established in Australia in 1958 and listed on the Australian Securities Exchange in 1962. Lendlease Ltd has been operating in the United Kingdom since 1991, delivering a number of iconic schemes, including the Bluewater Shopping Centre in Kent and the 2012 London Olympics Athletes' Village.
- 7.12 Lendlease Ltd has capability across development, construction and investment operating segments facilitating end-to-end capability across all aspects of practical delivery of major real-estate development.
- 7.13 As at 30 June 2022, Lendlease Ltd has an international pipeline of development projects valued with a value of £64.2bn, assets and funds under management of circa £23.5bn, development capital of £3.0bn and cash assets of £0.7bn.
- 7.14 Lendlease Ltd is a major participant in urbanisation, including urban regeneration, in Europe with a development pipeline of more than £27.7bn (as of 31 December 2022) across nine major urban projects including Thamesmead Waterfront, Euston Station, Silvertown Quays, International Quarter London and Elephant Park in London; Smithfield in Birmingham; and Milano Santa Giulia and Milan Innovation District in Italy. As set out further below, these projects amount to a residential pipeline of 31,116 residential units and 1,436,000 sqm of commercial floorspace:
- 7.14.1 Elephant Park, London, UK – Lendlease Ltd, in partnership with the London Borough of Southwark, is currently bringing forward the redevelopment of Elephant & Castle. Planning permission for the redevelopment of the site was granted in 2013 for a mixed-use development comprising circa 3,208 residential units as well as office and retail space. 2,303 residential units, 9,000 sqm of retail space and a new public park have been provided to date and a further 646 residential units are currently under construction. As of 2022, Elephant Park has won over 30 awards across regeneration, design, planning placemaking, landscape, safe play, construction and safety and it is targeting to be the UK's first climate positive development when it completes in 2025;
- 7.14.2 International Quarter London, London, UK – Lendlease Ltd obtained planning permission in 2010 for the redevelopment of the nine-hectare site located at the gateway to the Olympic Park in Stratford, London. Construction commenced in 2014 with over 333 residential units, 97,000 sqm of office space and 3,000 sqm of retail space provided to date. The project is focused on empowering the local community to leverage employment and business opportunities generated by the development and has provided 1,333 local jobs and delivered 301 apprenticeships. The project has won awards for its sustainability achievements including Outstanding BREEAM awards across multiple buildings;
- 7.14.3 Deptford Landings, London, UK – Lendlease Ltd is bringing forward the residential-led mixed-use redevelopment of the 4.7 hectares in Deptford alongside the London Borough of Lewisham. The site was acquired in 2014 and will deliver more than 1,400 residential units and 10,000 sqm of commercial, retail and leisure space. Construction commenced in 2018, with 203 units delivered to date, and a further 251 currently under construction. The scheme has a focus on nature and ecology which has included the planting of over 300 new trees and the creation of a new linear park;
- 7.14.4 Silvertown Quays, London, UK – The 27-hectare urban regeneration of the Royal Docks Enterprise Zone in East London is anticipated to provide 417,000 sqm of office space, over 3,000 apartments and 23,000 sqm of retail floorspace. The development includes the

refurbishment of key historic assets including Grade II listed Silo D, and the iconic Millennium Mills building and the rejuvenation of the Royal Docks enabling the enrichment of the area's prominent industrial heritage and identity. Lendlease Ltd has been working on the scheme since 2018 with initial site works having commenced and an anticipated completion date of 2035;

7.14.5 Thamesmead Waterfront, London UK – In partnership with Peabody, Lendlease Ltd is revitalising the existing Thamesmead town centre and surrounds, injecting new life into the areas plus 11,500 new homes, 37,000 sqm of office and 45,000 sqm of retail floorspace. The development proposes a comprehensive approach to regeneration with a cross-river extension of the Docklands Light Railway to Thamesmead in order to unlock the full ambition of this 100-hectare development. The scheme was secured in 2020 and is expected to be completed in 2040; and

7.14.6 Smithfield, Birmingham, UK – Smithfield presents a once in a lifetime opportunity to create a new community in the heart of Birmingham. The scheme spans 17 hectares of the city centre and is due to deliver more than 3,000 new homes, establish a new home for the historical Bull Ring Markets, deliver a new public square, improved transport, public parklands and a space for local art. There will also be 82,000 sqm office and 44,000 sqm of retail floorspace. Lendlease Ltd secured the project in 2021 and is working toward a completion date in in 2035.

7.15 Lendlease is a experienced developer with a track record of delivering projects comparable to the Scheme and is therefore well placed to undertake and deliver the Scheme.

7.16 **Investment to date, funding and delivery**

7.17 Lendlease and Lendlease Ltd are committed to delivering the Scheme.

7.18 The Scheme, and the Regeneration Scheme, is aligned with Lendlease Ltd's strategy to target urban renewal of large-scale, mixed-use projects in global gateway cities, such as London.

7.19 The Regeneration Scheme is identified within Lendlease Ltd's published 2022 accounts and featured in the Lendlease Ltd Major Urban Projects report June 2022 as a secured Major Urban Project that is identified for delivery from FY2023 onwards to achieve Lendlease Ltd's annual completion targets and global development strategy.

7.20 Lendlease Ltd has access to a wide range of funding including significant funds under management and internal development capital as set out in Section 7 of this Statement. The Council has been advised that funds are provided to Lendlease by Lendlease Ltd in order to deliver the Scheme and the wider Regeneration Scheme. This is evidenced by Lendlease's significant investment since entering into the DA and CPOIA in relation to progressing the Scheme and wider Regeneration Scheme through the planning process.

7.21 Lendlease has had a team of in-house experts working on the Regeneration Scheme covering development, finance, project management and construction as well as a team of experienced consultants, covering design, planning, community engagement, construction and site assembly, to bring forward the Scheme following the grant of the Planning Permission.

7.22 Lendlease has advised the Council that it has, to date, committed expenditure in excess of £15m in relation to the delivery of the Regeneration Scheme, which has been funded by Lendlease equity.

7.23 Lendlease has indicated that moving forward the Scheme is likely to be funded by a combination of grant funding, equity and investment partners of Lendlease Ltd.

7.24 Pursuant to the terms of the CPOIA the Council is responsible for funding the initial acquisition of the Order Land with Lendlease required to reimburse the Council as it draws down phases of the Scheme.

7.25 Based on the current delivery timetable, the first three plots to be delivered are 100% affordable housing.

- 7.26 The DA sets out the terms upon which the Council can acquire the affordable housing units within the Scheme.
- 7.27 The GLA grant funding (as referred to at Section 2.28 of this Statement) alongside the tenure of the first plots and terms of the DA and CPOIA supports the delivery of the initial phases of the Scheme.
- 7.28 Later phases of the Scheme are envisaged to be financed through a mixture of internal funding and investment partners. As set above, Lendlease Ltd has a strong and sustained track record of developing large scale urban regeneration projects in partnership with investment partners using a combination of different funding models. Alongside Lendlease Ltd's extensive funds under management, Lendlease Ltd has a series of strong and longstanding relationships with a range of UK and international lenders seeking to participate in projects such as the Scheme. Lendlease Ltd has conducted preliminary discussions with existing investment partners who have shown interest in the Scheme.
- 7.29 By reason of the above, Lendlease has access to a variety of funding mechanisms and so it is well placed to identify and source the most appropriate funding solution to deliver the Scheme taking into account availability of funding, time periods and alignment with project objectives at the relevant time.
- 7.30 In light of the above, the Secretary of State is able to be satisfied that the necessary funds will be available to complete the assembly of the Order Land and to carry out and complete the Scheme.

Development Agreement

- 7.31 As is commonplace with development agreements, the DA obliges Lendlease to carry out the Regeneration Scheme, subject to the fulfilment of specified conditions. In summary, these are as follows:
- 7.32 **Initial Site Wide Conditions**
- 7.33 The Strategy Condition which requires strategies, including those relating to the design and delivery of the development to be agreed. The Strategy Condition has been satisfied.
- 7.34 The Statutory Consents Condition which requires all necessary statutory consents for the disposal of the land to which the DA relates to have been obtained. The Statutory Consents Condition has been satisfied.
- 7.35 The Planning Condition which requires planning permission to have been granted for the entire Regeneration Scheme that is satisfactory to Lendlease and the Council and is free from legal challenge. The Planning Permission was granted on 31 August 2022. The six-week period for legal challenge expired on 12 October 2022. Two applications for judicial review were submitted. Both applications were refused permission on the papers. The application submitted on behalf of THFC was renewed. Permission was refused again by Lieven J at a renewal hearing on 21 and 22 March 2023. THFC has appealed that decision. The appeal is currently before the Court of Appeal.
- 7.36 **Phase Conditions**
- 7.37 As is commonplace for a project of this size and scale, the Scheme will be delivered in phases, and the DA sets out a set of conditions for each phase.
- 7.38 Following the satisfaction of the Initial Site Wide Conditions, the obligation on the Council to grant a lease of a phase of the development, thereby enabling the delivery of it, is subject to certain conditions being satisfied. In summary, these are as follows:-
- 7.38.1 The Planning Condition which requires detailed planning permission to have been granted for that phase that is satisfactory to Lendlease and the Council and is free from legal challenge. The Planning Permission (which remains subject to legal challenge as referred to within Section 7.35) grants detailed planning permission for Plot A. Lendlease will submit reserved matters applications setting out the detail of Plots B-G within the project programme to ensure this condition is satisfied.

- 7.38.2 The Affordable Housing Grant Condition which, in relation to any phase that contains affordable housing units, requires Lendlease to have entered into a grant agreement with the GLA for affordable housing grant in respect of the affordable housing units within that phase.

The Affordable Housing Grant Condition has been satisfied for the whole of the Scheme.

- 7.38.3 The Vacant Possession Condition which requires the securing by agreement, appropriation or otherwise of vacant possession of the phase.

Vacant possession of the majority of Plot A has been secured. Vacant possession of the remaining part is expected to be achieved shortly.

Notwithstanding this the Council has adopted a cautionary approach such that, Plot A, alongside the rights required to deliver it, are included within the Order to ensure timely delivery.

Vacant possession of the remaining phases will be obtained either via agreement, the use of the Council's powers contained within the Housing Act 1985 or (subject to confirmation) the use of the powers within the Order. The Council has set out above and within the Order the extent of the freehold and leasehold interests that have been acquired to date and those remaining to be acquired.

- 7.38.4 The Building Contract Condition which requires a building contract to have been entered into in respect of all of the works contained within the phase or (subject to the remaining phase conditions having been satisfied) the first plot within the phase. The Council is satisfied that this condition will be met.

- 7.38.5 The Delivery Methodology Condition which requires a methodology to be agreed for the delivery of the development demonstrating that any effect on operations, housing and / or commercial activity in other parts of High Road West is fully mitigated during the delivery of Phase 1.

The Delivery Methodology Condition for Plot A has been satisfied.

- 7.38.6 Pre-Planning Viability Condition which in respect of any phase which contains market units (other than Phase 1 which for the purpose of the DA includes Plots A and D of the Planning Permission) requires Lendlease, prior to the submission of reserved matters for that phase, to demonstrate the viability of a) that phase of the Scheme and b) the overall Regeneration Scheme.

- 7.38.7 Post Planning Viability Condition which in respect of any phase that contains market units (other than Phase 1) requires Lendlease, following the grant of reserved matters for that phase, to demonstrate the viability of a) that phase of the Scheme and b) the overall Regeneration Scheme.

Lendlease is satisfied that the development permitted by the Planning Permission is viable and, as explained above, the Council is satisfied that Lendlease has and will have the necessary funds to complete the assembly of the Order Land and to carry out (and complete) the Scheme in accordance with the Planning Permission.

- 7.38.8 Socio Economic Output Condition which requires Lendlease (in respect of all phases other than Phase 1) to have achieved the outputs and key performance indicators identified in the Socio Economic and Skills Strategy in relation to the preceding phases. The Council is satisfied that this condition will be met.

- 7.38.9 Milestone Condition which requires Lendlease to have achieved a certain level of progress in respect of earlier phases. The Council is satisfied that this condition will be met.

7.39 **Timetable for Delivery**

- 7.40 The Scheme will be delivered in a number of phases.

7.41 The phasing has been developed to reflect a realistic programme for delivery of the Scheme as well as the strategy for rehousing existing residents of the Love Lane Estate. The Scheme is capable of being delivered independently of Phase B and this is the current intention of the Council and Lendlease.

7.42 The phasing has recently been updated to achieve early delivery of the affordable housing units, thereby ensuring the benefits of the Scheme are brought forward quicker while also reducing the level of disruption to existing residents. The updated phasing strategy for the Scheme, including an indicative programme with proposed start on site and completion dates is set out below. Such start on site dates are subject to vacant possession of the necessary land being obtained.

Phase	Plots	Anticipated Start Date	Anticipated Comp. Date
Phase 1A	Plots A	Q4 2023	Q3 2025
Phase 1B	Plot D	Q3 2025	Q3 2032
Phase 2	Plot C1	Q3 2025	Q1 2028
Phase 3	Plot B	Q3 2025	Q1 2029
Phase 4	Plot C2	Q1 2027	Q3 2029
Phase 5	Plot E	Q2 2028	Q1 2030
Phase 6	Plot G	Q2 2028	Q4 2030
Phase 7	Plot F	Q3 2028	Q2 2034

7.43 The Council and Lendlease will continue to seek to acquire by agreement any outstanding interests in the Order Land in accordance with the phasing strategy for the delivery of the Scheme and similarly will implement the Order (where required) to allow the phasing and decant proposals to be achieved.

7.44 In order to provide certainty on the ability to deliver the Scheme (which will include the delivery of new housing funded by the GLA and the flexibility to enable the re-provision of homes for all qualifying residents) the Council has included all land and rights required to deliver the Scheme within the Order now, including land required for the later sub phases which are not due to commence until Q3 2028.

7.45 As noted previously, works commenced on Plot A in March 2023. Such works resulted in the implementation of the Planning Permission. Demolition of the former Whitehall and Tenterden Community Centre will be completed in June 2023, with demolition of the remaining building within Plot A expected to be completed by Q3 2023, subject to vacant possession being achieved.

7.46 Works on the remaining phases will commence in accordance with the phasing strategy and following satisfaction of the relevant conditions within the DA which includes vacant possession of the land required to deliver that phase having first been obtained.

7.47 It is anticipated that the first residential units, within Plot A, which will be affordable homes for existing residents, will be completed in Q3 2025.

8. THE USE OF THE ENABLING POWERS

8.1 Section 226(1)(a) and section 226(3)(a) of the Town and Country Planning Act 1990

8.2 Section 226 of the Town and Country Planning Act 1990 ("**the 1990 Act**") confers power on a local authority to acquire land compulsorily for development and other planning purposes if authorised to do so by the Secretary of State.

8.3 Section 226(1)(a) of the 1990 Act gives a local authority power to acquire compulsorily any land within its area if it thinks that the acquisition will facilitate the carrying out of development, re-development or improvement on or in relation to that land.

8.4 Where a local authority exercises its power within section 226(1)(a), pursuant to section 226(3)(a) of the 1990 Act it may also acquire land adjoining the land so required to facilitate its development or use.

8.5 The power to acquire land compulsorily conferred by section 226(1)(a) of the 1990 Act is subject to subsection (1A), which provides that the acquiring authority must not exercise the power unless it thinks that the proposed development, redevelopment or improvement is likely to contribute to the achievement of any one or more of the following objectives:-

8.5.1 the promotion or improvement of the economic well-being of its area;

8.5.2 the promotion or improvement of the social well-being of its area; and

8.5.3 the promotion or improvement of the environmental well-being of its area.

8.6 The Council is satisfied that the Scheme will contribute to each of these statutory objectives and so fulfils the tests within subsection (1A). Section 9 of this Statement describes the well-being benefits that the Council is satisfied will be realised through implementation of the Scheme.

8.7 Section 13 Local Government (Miscellaneous Provisions) Act 1976

8.8 Section 13 of the Local Government (Miscellaneous Provisions) Act 1976 ("**the 1976 Act**"), enables local authorities to create and purchase compulsorily new rights over land, where the acquisition of the land itself is not required and where such rights are not in existence when the compulsory purchase order is made. In the Order, new rights are sought for: (i) crane oversailing, (ii) access, (iii) works to the highway and landscaping, and (iv) erecting scaffolding and hoarding during the construction period. Having considered how the redevelopment is to be carried out, in order to ensure delivery, the Council is seeking to exercise powers under section 13 of the 1976 Act for the creation and compulsory purchase of new rights over part of the Order Land. These new rights are required to implement and complete the redevelopment of the Order Land. At the time of making the Order the Council confirms that such rights were not in existence over that part of the Order Land.

8.9 Section 9 below explains why the exercise of these powers is necessary and compellingly justified in order to facilitate the delivery of the Scheme.

8.10 2019 Guidance – Compulsory Purchase and the Crichel Down Rules

8.11 Government guidance on the use of compulsory purchase powers is provided in the 2019 Guidance which states that a compulsory purchase order should only be made where there is a compelling case in the public interest.

8.12 The 2019 Guidance at Tier 1, paragraph 2 sets out that acquiring authorities should be sure that the purposes for which the compulsory purchase order is made justify interfering with the human rights of those with an interest in the land affected. It requires that the officers' report seeking authorisation for the compulsory purchase order should address human rights issues. That was done in this case. Section 11 of this Statement sets out further consideration of human rights.

8.13 Tier 1, paragraph 2 also sets out that acquiring authorities are required to demonstrate that they have taken reasonable steps to acquire all the land and rights included in the Order by agreement. The

Council has sought to acquire the interests by agreement and will continue to do so alongside the promotion of the Order. Further details are set out in section 12 of this Statement.

- 8.14 Tier 1, paragraph 6 provides guidance that the Public Sector Equality Duty in section 149 of the Equality Act 2010 must be fulfilled. The Council (and the Secretary of State) must discharge the Public Sector Equality Duty when making (and confirming) a compulsory purchase order. Paragraphs 11.14-11.24 of this Statement provide further information on how the Council has done so throughout the process.
- 8.15 Tier 2, section 1 (paragraphs 94-106) provides specific advice on the making of orders under section 226 of the 1990 Act. Paragraph 95 of section 1 states that the powers under section 226 are intended to provide a positive tool to help acquiring authorities with planning powers to assemble land where this is necessary to implement proposals in their Local Plan or where strong planning justifications for the use of the power exist. Sections 6 and 9 of this Statement address the planning framework and justification for the Order.
- 8.16 Paragraph 97 of tier 2, section 1 refers to section 226(1)(a) of the 1990 Act enabling acquiring authorities with planning powers to acquire land if they think that it will facilitate the carrying out of development, redevelopment or improvement on, or in relation to, the land being acquired, and it is not certain that they will be able to acquire it by agreement.
- 8.17 Paragraph 103 of the same section refers to section 226(1) (a) being restricted under section 226(1A), in the terms set above. It makes clear that the benefit to be derived from exercising the power is not restricted to the area subject to the compulsory purchase power, as the concept of wellbeing is applied to the whole (or any part) of the acquiring authority's area. Section 9 of this Statement explains the wellbeing benefits which will result from delivery of the Scheme.
- 8.18 Paragraph 104 of tier 2, section 1 sets out further information on the justification required to support an order to acquire land compulsorily under section 226(1)(a) of the 1990 Act. This includes:-
- 8.18.1 Programme of land assembly to be set within a clear strategic framework (see sections 2, 3 and 6 of this Statement).
- 8.18.2 Such a framework needs to be founded on an appropriate evidence base and to have been subjected to consultation processes (see sections 3 and 6).
- 8.18.3 The planning framework should be as detailed as possible in order to demonstrate that there are no planning or other impediments to the implementation of the scheme (sections 5, 6 and 9).
- 8.18.4 Consideration of the National Planning Policy Framework as this is a material consideration in all planning decisions (section 6).
- 8.19 Paragraph 105 of tier 2, section 1 makes it clear that it is not always feasible or sensible to wait until the full details of the scheme have been worked up before proceeding with the order. In such cases the responsibility lies with the acquiring authority to put forward a compelling case for acquisition in advance of resolving all uncertainties. Section 5 sets out details of the Planning Permission and explains the parameters for delivery of residential and non-residential floorspace within the Scheme. The Council considers that there is a compelling case to make the Order now, in order to secure delivery of the Scheme and the associated wellbeing benefits set out in section 9, in advance of the reserved matters being granted in respect of each sub-phase authorised by the Planning Permission.
- 8.20 Paragraph 106 further provides that in making a decision whether to confirm an order made under section 226(1)(a), the Secretary of State will take the following factors into account:-
- 8.20.1 whether the purpose for which the land is being acquired fits in with the adopted Local Plan for the area or, where no such up to date Local Plan exists, with the draft Local Plan and the NPPF (this is addressed in sections 5 and 6 of this Statement);
- 8.20.2 the extent to which the proposed purpose will contribute to the achievement of the promotion or improvement of the economic, social or environmental wellbeing of the area (this is addressed in section 9 of this Statement);

- 8.20.3 whether the purpose for which the acquiring authority is proposing to acquire the land could be achieved by any other means. This may include considering the appropriateness of any alternative proposals put forward by the owners of the land, or any other persons, for its reuse. It may also involve examining the suitability of any alternative locations for the purpose for which the land is being acquired. This is addressed in Section 10 of this Statement. It is to be noted that, as at the time of writing this Statement of Case, no third party has put forward any alternative proposals which are claimed to deliver the objectives of the Scheme or the benefits which it will deliver, as stated in section 9 below; and
- 8.20.4 the potential financial viability of the scheme for which the land is being acquired. A general indication of funding intentions, and of any commitment from third parties, will usually suffice to reassure the Secretary of State that there is a reasonable prospect that the scheme will proceed. The timing of any available funding may also be important. For example, a strict time limit on the availability of the necessary funding may be an argument put forward by the acquiring authority to justify proceeding with the order before finalising the details of the replacement scheme and/or the statutory planning position. Section 7 above demonstrates Lendlease's commitment to the Scheme and funding intentions to facilitate delivery of the Scheme pursuant to the DA. In December 2021, the Council entered into agreements with the GLA for the provision of £70,312,000 (seventy three million, three hundred and twelve thousand pounds) of Affordable Housing Grant and £21,200,000 (twenty-one million, two hundred thousand pounds) of Mayor's Land Fund to facilitate the delivery of the Scheme. As is common with such agreements, the provision of the funding is subject to the Scheme progressing in line with the target dates set out within the respective agreements.

8.21 Tier 2, section 19 (paragraphs 245 to 254) of the 2019 Guidance provides guidance on the compulsory purchase of new rights including under the 1976 Act. Paragraph 248 sets out that there should be a description of relevant powers and purposes (which purposes may, as here, be the same purposes as those for the land to be acquired). These matters are addressed in section 4 of this Statement.

8.22 The Council has acted in accordance with the 2019 Guidance in making the Order. The Council is exercising the powers under section 226(1)(a) of the 1990 Act because the Scheme will facilitate the redevelopment of the area and will make a significant contribution to the improvement of the economic, social and environmental well-being of the area, including residents of the Order Land. The exercise of the powers conferred by section 13 of the 1976 Act is also required to facilitate development of the Scheme (as set out in section 4 above). Further explanation as to the justification for the use of compulsory purchase powers is set out in the subsequent sections of this Statement of Case.

9. **THE PURPOSE AND JUSTIFICATION FOR THE USE OF COMPULSORY PURCHASE POWERS**

9.1 Through its policies, the Council has consistently recognised and promoted the need to regenerate the North Tottenham area and specifically the High Road West area, as summarised in section 2 of this Statement.

9.2 The section below sets out the purpose and justification of the use of compulsory purchase powers to facilitate the carrying out of development, applying the tests set out in the 2019 Guidance.

9.3 It explains and justifies how the Scheme will improve the environmental, social and economic well-being of the Order Land and the surrounding area.

9.4 The Council's case is that the use of compulsory purchase powers is necessary to acquire the Order Land (including the new rights) to facilitate the delivery of the Scheme and that delivery of the Scheme is compellingly in the public interest.

9.5 **Facilitate the carrying out of development**

The acquisition of the Order Land is required to secure the delivery of the Scheme. It will also facilitate delivery of the wider Regeneration Scheme, consistent with adopted planning policy.

9.6 **Clear Strategic Framework**

9.7 The Scheme will contribute to the delivery of the planning policies and the requirements of the Development Plan, including London Plan (2021), the Strategic Policies Development Plan Document (2017) and TAAP (2017).

9.8 Further information on how the Scheme accords with the Development Plan, as well as the NPPF, is set out in sections 5 and 6 of this Statement.

9.9 **Wellbeing benefits**

9.10 The Scheme will make a significant and valuable contribution to the achievement of the promotion or improvement of the economic, social or environmental wellbeing of the area, as follows.

9.11 **Economic**

9.12 The North Tottenham area has consistently been ranked as one of the most deprived in the country. The Index of Multiple Deprivation (IMD) brings together data covering seven different aspects or 'domains' of deprivation into a weighted overall index, which are used to rank the Lower-layer Super Output Areas (LSOA) nationally. The entire population within the Scheme area fall within the most deprived quintile, which is considerably higher than the comparative population for Haringey (34%), London (16%) and England (20%).¹²

9.13 A review of socio-economic data for the nine LSOAs within / in closest proximity to the Order Land also highlights the economic challenges that local residents face. The area has a lower proportion of economically active residents (61.9%) in comparison to the Haringey (67.2%) and London (66.2%) averages.¹³ The proportion of residents who have never worked or are long-term unemployed (16.5%) is also approximately 5% higher than the Haringey average.¹⁴ More than a quarter of residents (28.3%) have no academic or professional qualifications, significantly above Haringey (18.5%) and London (16.2%).¹⁵ Many residents face complex challenges and barriers to finding and sustaining good quality employment.

9.14 The average Net Annual Income (equivalised) After Housing Costs (NAIAHC) for households within the area is £20,100, significantly below the Haringey average of £30,000.¹⁶ Bruce Castle ward, within which the Order Land is situated, has the second highest proportion of pupils receiving free school meals (FSM) in the borough, with 32.2% receiving FSM in comparison to the borough average of 29.3%.¹⁷ The increasing cost-of-living is continuing to impact those residents already affected by several years of income disruption as a result of Covid-19. Particularly as at times in 2020, the Tottenham constituency had the highest furlough rate in the UK.¹⁸

9.15 Within this context, there is a compelling need to regenerate this part of the borough. It is for this reason that the regeneration of Tottenham has been and continues to be a key priority for the Council.

9.16 The Scheme will make a highly significant contribution to tackling the economic issues facing local residents and businesses. The Scheme will create significant employment opportunities during both the construction and operational phases. It will also provide employment and training opportunities, alongside the delivery of a new Library and Learning Centre, so that residents have access to more jobs locally, while also having the right skills to access jobs across London. The investment in an enhanced town centre focused around the new public square as well as the increased customer base, associated with the significant quantum of much needed new market and affordable housing, will also deliver a significant boost to the local economy, benefiting existing and new businesses in the local area and increasing the vitality and viability of the local economy.

¹² Source: ONS 2020 mid-year population estimates and MHCLG 2019 Indices of Multiple Deprivation

¹³ Source: TS066, Census 2021

¹⁴ Source: TS062, Census 2021

¹⁵ Source: TS067, Census 2021

¹⁶ Source: ONS Income estimates for small areas, England and Wales

¹⁷ Source: School Census January 2022

¹⁸ Source: Coronavirus Job Retention statistics, 2021

- 9.17 On the basis of the illustrative masterplan¹⁹ submitted in support of the planning application for the Planning Permission, the Council's case is that the Scheme will directly and indirectly benefit the economic wellbeing of the residents of Tottenham and the borough by:-
- 9.17.1 creating an average of 422 direct FTE jobs in construction during each year of the demolition and construction phase of the Scheme, providing new job opportunities for unemployed residents;
 - 9.17.2 supporting a further 418 FTE jobs across a range of sectors and services (through indirect / supply change and wider induced effects) during each year of the demolition and construction phase of the Scheme;
 - 9.17.3 generating £43,300,000 (forty-three million, three hundred thousand pounds) direct Gross Value Added ("**GVA**") and £49,800,000 (forty-nine million, eight hundred thousand pounds) indirect and induced GVA per annum from the construction phase of the Scheme;
 - 9.17.4 supporting the ongoing vitality and viability of the local economy by generating a net additional annual expenditure of £12,600,000 (twelve million, six hundred thousand pounds) and, in the process, supporting 89 FTE net additional jobs in retail, leisure, hospitality, catering and other services once the non-residential space within the Scheme is fully open and trading;
 - 9.17.5 the addition of new homes will provide increased customer base for existing and new businesses in the area, as well as widening the customer pool and supporting business retention and growth. Helping to deliver a significant boost to the vitality and viability of the local economy by generating 'first occupation' expenditure of £8,100,000 (eight million, one hundred thousand pounds) over a ten-year period following occupation of the first homes within the Scheme; and
 - 9.17.6 delivering £2,500,000 (two million, five hundred thousand pounds) in (gross) Council Tax receipts and around £413,200 (four hundred and thirteen thousand, two hundred pounds) of (gross) Business Rates revenue each year for the Council in perpetuity.
- 9.18 In addition to the above, and on the assumption that the maximum parameters of the Planning Permission were delivered, the Scheme could support the delivery of up to 504 net additional FTE jobs.²⁰
- 9.19 Furthermore, the new Library & Learning Centre will provide training and education opportunities for residents to support new jobs and further education, particularly beneficial for NEETs and jobseekers.
- 9.20 The delivery of new jobs and the learning opportunities is underpinned by further obligations contained within the section 106 Agreement to secure local training and employment benefits. In particular, the section 106 Agreement requires Lendlease to:-
- 9.20.1 provide work experience placements (such number to be agreed with the Council prior to each plot of the Scheme coming forward); and
 - 9.20.2 during the construction phase of the Scheme a) procure that not less than 20% of the construction workforce are residents of the borough b) provide skills based training to all such residents c) offer placements for apprenticeships (1 per £3,000,000 (three million pounds) construction cost which is likely to result in circa 85 apprenticeships being offered in connection with the delivery of the Scheme) and d) work placements for unemployed residents of the borough, which will provide opportunities for routes into training and employment for unemployed residents within North Tottenham and the wider borough.

¹⁹ Based on the information contained within the "High Road West Hybrid Planning Application – Socio Economic Benefits Statement" prepared by Lichfields dated May 2022

²⁰ Based on the information contained within the "High Road West Hybrid Planning Application – Socio Economic Benefits Statement" prepared by Lichfields dated May 2022

- 9.21 The Council is satisfied that the Scheme will make a significant contribution towards the improvement and promotion of the economic well-being of its area.
- 9.22 **Social**
- 9.23 The economic benefits noted above and the environmental benefits listed below will improve the social well-being of the area by creating jobs and creating a new attractive environment within which to live, work and play. In addition to those benefits, the Scheme will create a range of social benefits for local people and businesses in North Tottenham and the wider community, particularly through the provision of a substantial number of new high-quality homes which respond to local needs, improved access to social infrastructure, and design interventions that would promote a safer neighbourhood. These together will ensure that the Scheme makes a significant contribution towards the promotion and improvement of social well-being in the area.
- 9.24 The Council's Corporate Delivery Plan 2023/2024 ("**CDP**") places significant priority on delivering the Council's vision to ensure that all residents have access to a safe, sustainable, stable and affordable home. This is in recognition that the availability and quality of housing directly impacts on residents' health, wellbeing, safety and financial stability. Housing also has broader implications for the Council's ability to respond to the climate emergency, support residents during the cost-of-living crisis, address inequality and build strong communities.
- 9.25 It is evident that there is a need for a significant increase in the number of affordable homes in the borough and North Tottenham, particularly with the correct mix of size and accessibility. Haringey has over 11,000 households on the waiting list. The Tottenham constituency has the 3rd highest level of overcrowding in the UK, with housing supply not meeting need, particularly for families.²¹ North Tottenham is home to a large proportion of families with children: 51% of households in the area contain children, compared to 35% borough wide, with 33% of children living in poverty.²² There is a deficit of family housing, with fewer than 14% of properties in Council ownership in the area providing 3 or more bedrooms.
- 9.26 To highlight the correlation between lack of housing opportunities and health challenges, North Tottenham has a high rate of people in 'poor health' (11% compared to 7% borough average). As well as impacting on quality of life, this results in shorter life expectancy. For example, a man living in North Tottenham has an average life expectancy four years lower than the borough average, five years lower than the London average and over seven years lower than the average in some wards in the west of the borough.²³ North Tottenham also has a marked level of inactivity, between 27.8% and 35.7%. This has both direct impacts on health and resultant human, social and economic costs, including instilling barriers to employment.
- 9.27 Alongside this, improving community safety in North Tottenham has consistently been highlighted as a priority for residents through numerous consultation exercises. When compared to residents in the wider borough, residents of north Tottenham, are more likely to feel unsafe both during the day and after dark. In the Haringey Resident Survey 2021, 62% of residents in North Tottenham referenced crime and anti-social behaviour as the aspect they disliked most about their local area.²⁴ Between March 2022 and February 2023, the average number of anti-social behaviour (ASB) incidents in the local area per month (133) was more than double the borough average (65).²⁵ Similarly, the average number of crimes per month (311) over the same period is significantly higher than the borough average (190).²⁶ Haringey is also one of the top ten boroughs for serious youth violence in England.²⁷
- 9.28 In the context of the above, the specific social well-being benefits of the Scheme include:-
- 9.28.1 the delivery of between 1,350 and 1,665 new homes within an area of high housing need;

²¹ Source: House of Commons, Overcrowded housing England, 2021.

²² Source: Ministry of Housing, Communities & Local Government, 2019

²³ Source: OHID, based on ONS data, 2016-2020

²⁴ Source: Haringey Resident Survey, 2021.

²⁵ Source: <https://data.police.uk/data/archive/>

²⁶ Source: https://data.london.gov.uk/dataset/recorded_crime_summary

²⁷ Source: MPS Rate of all crimes per 1,000 population, January 2018 to December 2019.

- 9.28.2 the delivery of affordable homes (40% by habitable room) which will include at least 500 new social rented Council homes in an area with substantial housing waiting lists and overcrowding;
 - 9.28.3 as set out in the Landlord Offer and Local Lettings Policy, existing secure and non-secure tenants will be offered a new social rented home in the Scheme, supporting retention of existing family, community and social ties built up within the community;
 - 9.28.4 resident leaseholders within the existing Love Lane Estate will have the opportunity to purchase a new home within the Scheme, supporting retention of family, community and social ties built up within the community;
 - 9.28.5 a new public square (Moselle Square), will provide a range of benefits for the community, including leisure and social spaces and capacity for events, markets and other activities, as well as providing a more spacious and appropriate access to and from the Station and the THFC Stadium;
 - 9.28.6 the new Library and Learning Centre will provide a community hub which will enable stronger links to be made between residents and the Council enabling a variety of community and social benefits, such as youth support and counselling, a business hub and a gallery;
 - 9.28.7 the provision of a new modern GP surgery (if the existing floorspace is not re-provided within an alternative neighbouring location prior to it being required for redevelopment) will ensure high quality medical services are located within walking distance for the community;
 - 9.28.8 the provision of new private amenity space for residents will encourage social interaction, play for children, and provide the benefits of green space to residents; and
 - 9.28.9 the new homes and public spaces will be designed with Secured by Design principles in mind and in consultation with the community and local stakeholders, to promote a safer neighbourhood.
- 9.29 The Council is satisfied that the Scheme will make a significant contribution towards the promotion and improvement of the social well-being of its area.
- 9.30 **Environmental**
- 9.31 The Scheme has been designed to enhance the environmental well-being of the residents and other occupiers within the area and the borough as a whole. The Scheme also seeks to deliver on the Council's wider objective to respond to the challenges presented by a changing climate. This will require a transition in behaviours and will need to be supported by the promotion of more sustainable modes of transport and the creation of greener neighbourhoods.
- 9.32 The Council adopted a Climate Change Action Plan in March 2021, setting out the roadmap for how the borough will become net zero-carbon by 2041. This includes an objective to reduce emissions related to road transportation by 50% by 2025, by growing public and active travel options, low-carbon transport options and infrastructure (e.g. electric vehicle charging stations). These aspirations are also highlighted in the Council's Walking and Cycling Action Plan, adopted by Cabinet in March 2022, which recognises regeneration in Tottenham as an opportunity to provide new walking and cycling links, so that these are the natural choices for people living in new developments.
- 9.33 The Climate Change Action Plan also includes an objective to connect around 12,000 homes to low carbon heat sources and generate at least approximately 13 GW of renewable energy locally, including through the delivery of a Decentralised Energy Network (DEN) in North Tottenham. As highlighted in the section above considering the economic benefits of the Scheme, the local challenges faced by local residents in North Tottenham mean that there is an even greater need to reduce energy costs for residents. 11.9% of Haringey's population is in fuel poverty, and 16.4% of the population within the LSOAs in which the Scheme is located.²⁸

²⁸ Source: Fuel Poverty by LSOA, Department for Business, Energy and Industrial Strategy 2020

- 9.34 In the context of the above, specific environmental benefits of the Scheme include:-
- 9.34.1 the new homes, commercial and other non-residential spaces to be delivered as part of the Scheme will be built to modern standards providing well insulated, warm and energy efficient spaces thereby reducing energy use;
 - 9.34.2 the Scheme will improve connectivity via safe and accessible walking and cycling routes which will encourage active travel, reducing vehicle use and increasing residents' health and wellbeing;
 - 9.34.3 the Scheme will include provision for all new homes to connect to the Council's District Energy Network, once operational, ensuring that the Scheme aligns with the Council's energy strategy to deliver low carbon, sustainable energy;
 - 9.34.4 the Scheme will result in a net reduction in car parking spaces while providing electric vehicle charging points to facilitate the move from petrol and diesel-based vehicles to active travel and electric car options;
 - 9.34.5 the landscaping and public realm to be provided as part of the Scheme is designed as green and healthy streets with planting designed to reflect the nature and mitigate the impact of the local water network of the Lea Valley;
 - 9.34.6 the public realm will also provide new and enhanced amenity space for both residents and the wider local community;
 - 9.34.7 the Scheme will deliver significant biodiversity enhancements through the delivery of new public realm, together with extensive tree planting and greening throughout; and
 - 9.34.8 the Scheme could support the creation of 504 net additional FTE jobs which would provide opportunities for employment close to home for residents, reducing transport use and encouraging active travel.²⁹
- 9.35 The Council is satisfied that the Scheme will make a significant contribution towards the promotion and improvement of the environmental well-being of its area.
- 9.36 **Efforts to acquire by agreement**
- 9.37 As set out in section 12 of this Statement, the Council and Lendlease have contacted all those with relevant interests within the Order Land inviting them to enter into negotiations with a view to securing acquisition of their interests by agreement. These negotiations will continue in parallel with the compulsory purchase process. However, due to the number of third-party interests within the Order Land, it is unlikely the Council will be able to acquire all the necessary interests by private agreement within a reasonable timescale. Compulsory powers are being sought so that, in the event that the Council is unable to acquire all the necessary interests by private agreement within a reasonable timescale, the Scheme can still proceed. This is consistent with paragraphs 2 and 17 of Tier 1 of the 2019 Guidance. Further information is set out in section 12 of this Statement.
- 9.38 **Lack of impediments, funding and deliverability**
- 9.39 The Council has considered whether there are any financial, planning, physical or legal impediments to the Scheme proceeding. The Council has selected Lendlease, and as set out in section 7 of this Statement, Lendlease has the experience, capacity, proven track record and skills to deliver the Scheme.
- 9.40 Section 5 of this Statement confirms that the Planning Permission for the Scheme was granted on 31 August 2022. The Planning Permission was lawfully implemented in March 2023. Overall, there are no planning impediments to the Scheme proceeding.
- 9.41 Section 7 of this Statement confirms that funding for the delivery of the Scheme is available.

²⁹ Based on the information contained within the "High Road West Hybrid Planning Application – Socio Economic Benefits Statement" prepared by Lichfields dated May 2022

- 9.42 There is some operational land of statutory undertakers and electronic communications network code operators within the Order Land. All statutory undertakers and operators have been identified and discussions are progressing with them as described in section 12 of this Statement.
- 9.43 Section 14 below describes the related highways orders needed in connection with the implementation of the Scheme which are being progressed in time to meet the proposed delivery programme.
- 9.44 In summary, the Council is satisfied that once the Order Land has been assembled, there are no financial, physical, planning or legal impediments to the Scheme proceeding.

10. **OTHER MEANS TO DELIVER THE BENEFITS**

- 10.1 Tier 2, section 1, paragraph 106 of the 2019 Guidance states that consideration should be given to whether the purpose for which the acquiring authority is proposing to acquire the land could be achieved by any other means. This may include considering the appropriateness of any alternative proposals put forward by owners of the land, or any other persons, for its reuse or examining the suitability of alternative locations.
- 10.2 The Council has considered whether there are any realistic alternatives which could achieve the planning objectives and the purposes of the Order. The purposes for which the Order Land is proposed are in accordance with the adopted Development Plan and the well established strategic objectives of the Council.
- 10.3 Although the Council is the freehold owner of the majority of the Order Land, the number and diversity of other interests in that land and the need for the new rights indicate that the prospects of acquisition of all the required interests and new rights by agreement to enable comprehensive redevelopment within a reasonable timescale are very unlikely.
- 10.4 Given that the Council is the majority owner of the Order Land and given the fragmented ownership / interests otherwise in the Order Land, there is no other party in a position to bring forward its comprehensive development.
- 10.5 The only realistic alternative means of delivery would require the Council to enter into an arrangement with a different developer partner for the delivery of the objectives of the Scheme and wider Regeneration Scheme and which would necessitate further procurement processes and potentially the promotion of a new scheme. This would lead to very significant delay in the realisation of the benefits identified earlier in this Statement and of the Council's long held policy and strategic objectives for High Road West. There is no reason to suppose that, at the end of the process here envisaged, the outcome would be in any way an improvement over the current delivery arrangements. To the contrary, the Council is satisfied with the quality and efficacy of the current delivery arrangements.
- 10.6 As regards the prospect of the purposes of the Order being achieved at a different location, in the present case any scope for this is limited. By definition, an alternative site could not fulfil the purposes of the Order which are to regenerate the Order Land, contribute to the achievement of the planning policies within the adopted Development Plan for the area and, where possible, to re-accommodate residential occupiers as close as possible to their present homes.
- 10.7 Overall, for the reasons set out above and below it is concluded that there is no credible or realistic alternative which could deliver a comprehensive scheme for the Order Land which meets the planning policy objectives and the purposes of the Order within a reasonable timeframe.

Requirement for the properties on the High Road

- 10.8 As summarised at Appendix 1, a number of the objections raise points regarding the requirement for the properties on the High Road. In this section of its case, the Council explains that the requirement for those properties is founded upon the planning, design and townscape principles through which the Scheme seeks to deliver its economic, social and environmental benefits to the local and wider community.

- 10.9 Tottenham High Road represents the area's central arterial connection to the rest of the borough and central London. It is the centre of North Tottenham, hosting the area's major civic, leisure, education, retail and community assets. For this reason, it is identified across the Development Plan as presenting the right location for transformative growth.

Development Plan

- 10.9.1 The key document within the Development Plan that informed the layout and mix of uses within the design brief for the Scheme is the TAAP, notably Site Allocation NT5, which also requires that any development within the Site Allocation accord with the most up-to-date Council approved masterplan, being the HRWMF.
- 10.9.2 As noted within section 2 of this Statement, both the HRWMF and the TAAP were approved by the Council following extensive public consultation.
- 10.9.3 The need to acquire the High Road properties is founded upon the following design and placemaking objectives contained within the TAAP and the HRWMF:
- (a) TAAP (2017):
- (i) Creating a new public square, connecting an enhanced White Hart Lane Station, and Tottenham High Road, to complement the redeveloped THFC Stadium;
 - (ii) Providing new retail provision to enlarge the existing local centre, or creating a new local centre, opposite to and incorporating appropriate town centre uses within the redeveloped THFC Stadium, including the new Moselle public square;
 - (iii) Improving east-west pedestrian and cycling connectivity with places such as the Northumberland Park Estate and Lee Valley Regional Park;
 - (iv) Increasing and enhancing the quality and quantity of community facilities and social infrastructure, proportionate to the population growth in the area, including:
 - a) a new Learning Centre including library and community centre;
 - b) providing of range of leisure uses that support 7 day a week activity and visitation; and
 - c) providing a new and enhanced public open space, including a large new community park and high-quality public square along with a defined hierarchy of interconnected pedestrian routes;
 - (v) In the part of the site facing the new stadium, development should respond to both the existing High Road Character and the greater heights and density of the THFC Stadium; and
 - (vi) Locating larger commercial and leisure buildings within close proximity to the new public square linking the Station to the THFC Stadium.
- (b) HRWMF (2014):
- (i) Creating a new public square south of White Hart Lane as a focus for new leisure and community buildings;
 - (ii) Providing a high quality pedestrian route connecting the new Station to the High Road;
 - (iii) Creating a legible network of east-west streets that connect into the surrounding area;

- (iv) Providing new development between the new Station and the High Road which contains active ground floor uses onto the new public square;
 - (v) Delivering new buildings on the High Road that reflect the scale and architecture of the THFC Stadium opposite, and enhancing the urban grain on this section of the High Road with the THFC Stadium;
 - (vi) Improving the High Road with better pedestrian space, as well as a wider mix of shops and businesses to meet all your weekly shop needs locally; and
 - (vii) Providing a community hub built at the heart of High Road West, where Moselle Square meets the High Road.
- 10.9.4 In light of the above, the HRWMF supports the removal of the High Road properties in order to enable provision of a new, high quality active public space alongside a new library and learning centre and enhanced pedestrian connectivity between the new Station, public square, commercial development and THFC Stadium.

Design Brief

- 10.9.5 The masterplanning process undertaken by Lendlease, which led to the formulation of the masterplan submitted as part of the planning application for the Planning Permission, built on the policies and objectives set out within the Development Plan, specifically the TAAP and HRWMF.
- 10.9.6 Integral to the commercial and cultural design brief set out by Lendlease was the delivery of a scheme founded on the key principles contained within the TAAP and HRWMF which sought to transform the existing High Road, enhancing and extending the local centre with the provision of community, cultural and leisure floorspace, to create a high-quality, destination community heart. This objective was to be supported by the delivery of fit for purpose commercial and local centre floorspace that would be flexible and adaptable to the current and future demands of the North Tottenham local centre.
- 10.9.7 The design brief also sought to address the lack of open space. Thus, the design brief required that the scheme deliver extensive public realm and open space that is well-integrated into the surrounding streets and neighbourhoods. Particular emphasis was placed on fulfilling the key requirements of the HRWMF and the TAAP to create a new public square along the important new pedestrian link to be delivered between the improved Station and new THFC Stadium, as well as the creation of high-quality public realm at the site's interface with the High Road, complementing the redevelopment of the THFC Stadium and its significant contribution to the renewed character of the area. Improvement of the site's public realm was a key area of concern for both residents of the Love Lane Estate and the wider community during the consultation process that led to the approval of the HRWMF.
- 10.9.8 The requirement to acquire and remove the High Road properties opposite the THFC Stadium was identified early on in order to deliver on the requirements of the Development Plan and the design brief.
- 10.9.9 Through the masterplanning work undertaken, which eventually led to the submission of the planning application for the Planning Permission, a set of overarching placemaking principles were established that can be summarised as follows:
- (a) Transformative Tottenham;
 - (b) Reinvigorating the High Road;
 - (c) A complementary retail, community and leisure offer;
 - (d) Complementing and enriching the existing urban grain;

- (e) A generous open space defining the heart of the neighbourhood;
- (f) Connected by green public realm;
- (g) An inclusive community for multi-generational living; and
- (h) Key places of rich and varied character.

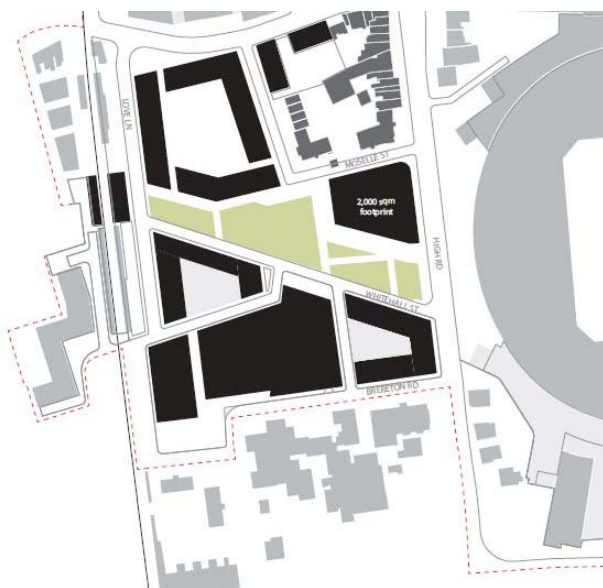
10.9.10 The acquisition of the High Road properties is necessary in order to achieve these overarching placemaking principles and deliver on the requirements of the Development Plan, for the following reasons.

Transformative Tottenham

10.9.11 The THFC Stadium regeneration has provided a catalyst for change, delivering a contemporary anchor for the High Road and the area. The redevelopment of the High Road properties will complement and build on the success of this positive change, providing further community facilities and leisure orientated retail to cement the area's growing reputation as a leisure destination.

10.9.12 The Development Plan clearly sets out the requirement for the development of the Site Allocation to be brought forward in a comprehensive manner so as to optimise its transformative regeneration potential.

10.9.13 Appendix B to the HRWMF presents a clear options appraisal ('the High Road Frontage Appraisal') that sets out the arguments for and against multiple scenarios for inclusion of the High Road properties. This comprehensive study identified option 6 as the preferred design approach (see extracted image below), establishing a clear rationale for the inclusion of the High Road properties.



Option 6 Masterplan Arrangement, High Road Frontage Appraisal, HRWMF, 2014

10.9.14 This early appraisal was key to establishing the Council's preferred approach in favour of removing the High Road properties. When approving the HRWMF, the Council concluded that including those properties would deliver the right opportunity for comprehensive redevelopment; to create a meaningful gateway, local centre interface, destination public space, and high-quality homes and community facilities befitting a development of this scale and significance. Furthermore, the HRWMF identifies that bulkier building masses should be located towards the THFC Stadium to provide for larger leisure uses, with taller buildings used as part of a wayfinding and movement strategy and the end of east-west routes.

- 10.9.15 The existing buildings are of low density and scale, predominantly comprising three storey terraced properties. Due to the significance of this important part of the Site, comprising the proposed nodal heart of the new local centre, the area is considered suitable for intensification.
- 10.9.16 The release of this land offers the opportunity to increase the mix of non-residential uses, as well as the size and number of units, while delivering a critical mass of accommodation at this key destination and wayfinding node.
- 10.9.17 For these reasons including the land within the comprehensive masterplan is considered critical to achieving the cumulative benefits of the Scheme. Opening the Site up to the THFC Stadium, via a generous new route between Plots C and E, facilitates a direct connection between these two primary areas of regeneration, linking High Road West to the Northumberland Park scheme to further realise the Council's ambition for integrating and connecting the major physical assets in the area.

Reinvigorating the High Road

- 10.9.18 Inclusion of the High Road properties within the Scheme delivers against the HRWMF principles of complementing the scale and architectural character of the THFC Stadium development, enhancing the placemaking quality of this section of the High Road. The removal of the existing properties is necessary in order to frame and activate the streetscape, locate larger commercial and leisure uses opposite the THFC Stadium, and provide a more generous, comfortable and safe pedestrian environment, to create a new leisure destination at the heart of the community.
- 10.9.19 The High Road's heritage significance is also an important reference point, establishing the urban fabric from which to draw inspiration. The Illustrative Masterplan captures this sense of local character and the heritage of the place by retaining and enhancing the setting of key heritage buildings, to continue a sense of layered history throughout the area. New infill and replacement development respects and responds to the Conservation Area and neighbouring heritage buildings, creating a transition between the new and the old.
- 10.9.20 As noted previously, the new Library and Learning Centre is located within Plot E, on the High Road, within the illustrative masterplan submitted alongside the planning application for the Planning Permission.
- 10.9.21 The importance of locating a community building on the High Road is supported by an understanding of the history of High Streets, which demonstrate a tradition of locating the highest quality buildings on these major public routes and municipal corridors.
- 10.9.22 A new community, leisure and retail building within Plot E offers the opportunity to create a building that architecturally responds to the contemporary language of the THFC Stadium, creating a balance and unity across the High Road, combining to frame this gateway to North Tottenham. This complementary design approach directly responds to the HWRMF's aspiration for the community building (to be located on the High Road), and THFC Stadium to frame the key vista looking north, taking in the heritage of existing buildings alongside these contemporary statement buildings, assisting the wayfinding character and identity of the High Road.
- 10.9.23 Retention of the High Road properties, in contrast, would leave a barrier between the High Road and the new facilities and either force the community building to the rear of the properties and further into the new Moselle Square (as identified within the High Road Frontage Appraisal) or require the facility to be provided within another development plot. The opportunity for the Scheme to deliver the most effective design approach and to fulfil both the site's potential and the relevant Development Plan policies would be diminished. Retention of the existing High Road properties would therefore result in a missed opportunity for transformative change to this important high street.

A complementary retail community and leisure offer

- 10.9.24 Core to the Development Plan is the delivery of a Library and Learning Centre alongside a mix of community and leisure spaces. As detailed previously, the optimum location for this facility is on the High Road, directly opposite the THFC Stadium, to complement the built form and placemaking quality of the THFC Stadium development.
- 10.9.25 Acquisition of the High Road properties enables the delivery of a wider range of larger, fit for purpose retail and food and beverage units befitting a local centre of this significance. The THFC Stadium, and associated future leisure uses, creates a place of regional significance. Alongside this iconic destination, the Scheme provides the opportunity to expand the existing local centre with high-quality public realm and a complementary mix of retail, community and leisure uses. A range of new uses will drive economic growth, helping existing and new businesses to thrive. The increased quantum of retail, leisure, community and cultural assets will draw a vibrant and mixed community to live, play, visit and work in the area, resulting in increased visitation and vitality.
- 10.9.26 Plot E within the Planning Permission offers the opportunity to provide the optimum location for the Scheme's largest amount of consolidated non-residential floor space, enabling the provision of larger capacity leisure facilities within a new building, reflecting the objectives of the Development Plan, while delivering a significant high-quality community asset to the area.
- 10.9.27 Plots E and C within the Planning Permission provide active commercial frontage onto the High Road and a generous pedestrianised opening into the heart of the neighbourhood. Retail frontages will frame the route into the centre of the Scheme, encouraging a flow of pedestrian movement from the High Road into the retail activity surrounding the new civic square. Both plots also offer the opportunity to deliver units with larger, contemporary floorplates, offering greater resilience by facilitating flexibility and adaptability for a multitude of town centre uses over time.
- 10.9.28 Retention of the existing properties would require the community building and retail and leisure uses to be located to the rear of the High Road properties. Such a disconnected relationship and lack of physical and visual connection would limit the opportunity for symbiotic benefits between the community, leisure and commercial clusters, likely resulting in the uses surrounding the new public square missing out on the footfall along the High Road, compromising their social and commercial success. The High Road Frontage Appraisal further highlights that, due to the requirement to provide a generous public square, a building in this rear location would deliver a smaller footprint and reduced overall floorspace quantum. This would negatively impact the provision of much-needed community and leisure space to the neighbourhood.

Complementing and enriching the existing urban grain

- 10.9.29 One of the driving principles of the Development Plan is the provision of a direct and animated route from the Station to the THFC Stadium, so as to deliver a high-quality arrival experience for this emerging regional destination, which fosters a sense of security, comfort, ease of movement and an improved quality of public realm. This objective responds to the area's significant challenges in managing the behaviour and movement of large crowds on event days, as well as its noticeable lack of quality public realm, and negative perceptions of safety.
- 10.9.30 In order to overcome these challenging conditions and to achieve the requirements of the Development Plan, the Scheme is required to deliver a highly considered public realm, incorporating the best practice principles of Secured by Design. These requirements can only be fully met by removing the High Road properties and replacing them with generous, safe, and pedestrian-first public realm, together with perimeter buildings that offer clearly defined public and private spaces, natural surveillance and activation of the streetscape.
- 10.9.31 The Scheme satisfies the applicable policy requirements by delivering a wide and open pedestrianised aperture onto the High Road, encouraging safe and comfortable pedestrian movement during the day and at night. Furthermore, both Plots C and E offer active commercial frontages onto both the High Road and the Station to THFC Stadium route, improving the perception of safety and acting to deter anti-social behaviour. Stitching into the network of streets surrounding the Order Land allows the Scheme to integrate with the

existing townscape and established movement routes. A network of new streets creates a legible urban grain. Running behind the High Road, pedestrian orientated north-south links connect the new neighbourhood, while east-west routes offer important connections to surrounding communities, improving permeability, accessibility and connections between key community destinations. New streets promote a positive relationship between buildings and public realm, delivering a strong sense of place, accessibility, animation and legibility. All internal routes promote low car usage and speeds to prioritise pedestrian and cycle movement and encourage ground floor activities to spill out into the public space.

10.9.32 The new THFC Stadium attracts high numbers of visitors, including a broad array of regular and first-time visitors to the area. In order to facilitate an ease of arrival and access from the Station to THFC Stadium, safe and efficient crowd flow is fundamental. Key to the design of this route are the following principles:

- (a) Direct line of sight from Station to THFC Stadium, creating an impressive and welcoming experience and clear orientation;
- (b) A car-free pedestrian and cycle route lined with retail and commercial units, offering activation and opportunities to receive high footfall on event days, supporting the area's commercial prosperity;
- (c) Route to be designed for pedestrians and cycles only, promoting pedestrian movement and limiting disruptions to vehicle movement on event days;
- (d) Sufficient widths and flexibility along the route to manage the queuing and movement of crowds while allowing for additional through-routes for access for residents and the wider community during events;
- (e) A sequence of generous and defined public spaces from the Station arrival, through Moselle Square, to the THFC Stadium landing; and
- (f) Compliance with the Stadium Event Local Area Management Plan (LAMP, 2010).

10.9.33 The Scheme responds to the above principles and the requirements of the Development Plan to deliver improved east-west permeability and connectivity through the area with a pedestrian and cycle first approach.

10.9.34 The Scheme's ability to deliver on those requirements would be significantly diminished if the existing High Road properties were to be retained, for the following reasons:

- (a) The THFC Stadium would not be as visible from the Station (and vice versa);
- (b) The junction of Whitehall Street and High Road presents a narrow route between the two corner buildings, which creates a funnelling effect with little opportunity for improvements to crowd movement or the desired quality of public realm and sense of arrival;
- (c) Existing pavement widths are restricted, causing pinch points and disruptions to ease of movement;
- (d) The rear of the properties and associated service road are poorly overlooked, poorly lit, and poorly maintained, resulting in a perception of a lack of safety and opportunities for anti-social behaviour;
- (e) The side elevations of the existing buildings facing Whitehall Street are unattractive and inactive. This narrow, unassuming and unappealing gateway to the new Moselle Square would do little to promote the use of, and footfall through, the Scheme's new public space; and
- (f) Whitehall Street would be required, at least in part, to be retained to continue to offer servicing access to existing commercial uses. This would remove the aspiration for the route to be car free, creating a highly conflicted junction at what

is intended to be a principal gateway to the Scheme. A requirement for vehicle access would significantly limit aspirations for safe, unobstructed pedestrian and cycle movement between Station and THFC Stadium.

A generous open space defining the heart of the neighbourhood

- 10.9.35 The Development Plan requires the delivery of a civic square and local centre focus, with a direct connection to the High Road and THFC Stadium.
- 10.9.36 The Scheme will introduce a new public open space (Moselle Square) at its heart, creating a lively destination and engaging space that promotes social interactions and healthy living. Moselle Square offers a generous space to celebrate community, leisure and nature, and will accommodate a mixed programme of activities to support the community's diverse social and cultural needs. Moselle Square is designed to encourage a vibrant and dynamic array of uses and activities, providing a platform for both THFC Stadium and community activities.
- 10.9.37 In order to deliver this 'place changing' new, high-quality, active public space, it is necessary to remove the High Road properties. By removing these properties, the combined land offers the opportunity to create a bridge and connection between the High Road and the new square, offering a crucial link to the activity of the THFC Stadium, greatly improving the attractiveness of the new "Moselle Square" to commercial occupiers and ensuring the vitality and viability of the public space and its surrounding uses. The success of this important conglomeration of active uses through strong connectivity and legibility is integral to the success of the Scheme, as well as its social and economic contribution to the wider area.
- 10.9.38 Moselle Square will be activated in particular by the community building, which as proposed within the Illustrative Masterplan, will offer visual connections (at ground floor level) to the High Road, supporting a sense of connection between the new square and the High Road, encouraging people moving along the High Road to explore and engage in the life of the square. This sense of physical and visual connection not only encourages natural surveillance; it also responds to the ambition of the TAAP.
- 10.9.39 Retention of the existing High Road properties would unavoidably detach the square from the High Road and THFC Stadium. This disconnection (and the reduced access between the High Road and the new square) would likely result in lower footfall, use and activation of the public space, presenting a significant challenge to the success of the new retail and commercial uses surrounding it.

Connected by green public realm

- 10.9.40 The High Road is currently identified as having a low index performance against Transport for London's (TfL) Healthy Streets initiative's assessment of relative 'healthiness'. The comprehensive acquisition of the High Road properties will enable the Scheme to be set back from the High Road carriageway and existing building line. This design approach is a direct response to the Healthy Streets initiative:
- (a) Create a street that is designed to prioritise pedestrians' needs;
 - (b) Create space for walking at the busiest times with suitable protection;
 - (c) Create an attractive, overlooked, well-lit and safe place to move along and wait for a bus;
 - (d) Ensure the building frontage onto the street is architecturally varied, animated and buildings are actively used by a wide variety of the community;
 - (e) Create space to introduce planting and trees to add colour, interest and a softening of the streetscape; and

- (f) Create space to introduce street furniture to encourage people to sit and inhabit the street in comfort.

10.9.41 The Scheme will create a green public realm network with connected open spaces characterised by places to socialise, places to play, and places to interact with nature. The design approach directly responds to the existing poor condition of the High Road, which is characterised by a narrow and highly cluttered pavement, poor activation and ground level surveillance, low quality finishes and a muddle of dark and disjointed shop fronts. If the existing condition were retained, there would be little opportunity for placemaking improvements and to align with the project's exemplar placemaking ambitions and Healthy Streets agenda.

An inclusive community for multi-generational living

10.9.42 Acquisition of the High Road properties to deliver Plot C within the Planning Permission offers the opportunity to provide a density of much needed - and mixed tenure - new high-quality homes. New homes will be designed to meet contemporary design standards, delivering comfortable and safe homes that are efficient to run and provide all residents with access to private and communal open space. New homes will be designed to create access to daylight, views of open space and shielding from sources of noise and air pollution, supporting residents' mental and physical wellbeing.

10.9.43 Retention of the existing properties along the High Road would result in the provision of fewer homes to the area. The residential units located over the existing commercial spaces will not have been designed to contemporary design standards and therefore may present poorer quality homes than their contemporary comparators, with less variety in tenure and size of properties. Importantly, the existing properties do not provide residents with any private amenity space and have not been designed with consideration to contemporary standards for resident safety and comfort, providing a poorer quality of residential experience and health outcomes.

Key places of rich and varied character

10.9.44 As noted within the TAAP, development of Site Allocation NT5 should adopt a process of 'well managed change', balancing continuity of local distinctiveness and character, with the need for active living spaces and appropriate facilities to accommodate local community needs.

10.9.45 The ad hoc development of the individual plots has resulted in both the front and rear elevations of the properties appearing disjointed and of a poor aesthetic and architectural quality, adding little to the character of the High Road or its sense of place.

10.9.46 Retention of the existing properties would remove the opportunity to deliver an architectural bridge between new and old. Further refurbishments and improvements to the existing properties would do little to improve the townscape character of the High Road, retaining the existing disjointed juxtaposition with the THFC Stadium opposite.

Summary

10.9.47 Overall, the removal of the High Road properties is considered a critical and necessary component of the Council's objective to transform the North Tottenham local centre. The delivery of the Scheme will transform the High Road into a contemporary mixed-use area, delivering on the policy objectives of the HRWMF and the TAAP to deliver social, physical and economic regeneration to an area that currently experiences fundamental social and economic disadvantages.

10.9.48 Removal of the existing properties on High Road is required in order to deliver an enhanced and expanded local centre, and a mix of ground floor commercial and community focused spaces that can host and blend retail, workspace, leisure and community uses. The open and animated site layout creates the positive interrelationship between the Station, Scheme and the transformative THFC Stadium development, supported by numerous placemaking ingredients brought together by a network of green public realm. The vitality of the new

mixed-use offer is underpinned by a critical mass of new homes and the expanded site allows for the location of these important uses on the major public route of the High Road.

- 10.9.49 Acquisition of the High Road properties will also enable site capacity and design quality to be optimised, securing the much-needed environmental, social and economic benefits for the area.

Compelling case in the public interest

- 10.10 Taking account of the benefits above, the Council believes that the public benefits of the Scheme strongly outweigh the interference with the rights of affected parties. Consequently, the Council believes that there is a compelling case in the public interest sufficient and proportionate to justify the confirmation of this Order.

11. HUMAN RIGHTS AND PUBLIC SECTOR EQUALITY DUTY

- 11.1 The Human Rights Act 1998 ("**the Act**") incorporated into domestic law the European Convention for the Protection of Human Rights and Fundamental Freedoms ("**the Convention**"). Section 6 of the Act makes it unlawful for a public authority to act in a manner which is incompatible with a Convention right.

- 11.2 The Convention rights engaged in the context of a compulsory purchase order include Article 1 of the First Protocol of the Convention and Articles 6 and 8 of the Convention. Article 14 of the Convention (prohibition of discrimination) is also relevant.

- 11.3 Article 1 of the First Protocol of the Convention states:

"Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law..."

- 11.4 Article 6 of the Convention provides that:

"In determining his civil rights and obligations...everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law".

- 11.5 Article 8 of the Convention provides:

"(1) Everyone has the right to respect for his private and family life, his home and his correspondence.

(2) There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interest of...the economic well-being of the country..."

- 11.6 The Courts have recognised, in the context of Article 1 of the First Protocol of the Convention, that regard must be had to the fair balance which has to be struck between the competing interests of those whose rights are affected and the community as a whole.

- 11.7 In relation to Article 6, all those whose proprietary rights are affected by the Order will be notified of the making of the Order, will have the right to make representations or raise objections to the Secretary of State, and any remaining objectors will have the right to be heard at any public inquiry. There is also a statutory right to challenge the validity of confirmation of the Order under the Acquisition of Land Act 1981. The statutory processes have been found to be compliant with Article 6 of the Convention.

- 11.8 Any interference with the Article 8 Convention rights must be in accordance with the law and must be necessary and proportionate.

- 11.9 The Council has taken into account the impact of the Order on the Convention rights of those whose land or interests will be affected by the Order. In view of the factual background to the Order as set out in this Statement, and the compelling justification for making the Order, the Council considers that any interference with protected rights resulting from the exercise of compulsory purchase powers

in this case is justified because it is in the public interest, authorised by law and necessary and proportionate in order to achieve the Council's objectives of securing the wider benefits to be achieved from the regeneration of the Order Land.

- 11.10 The Council and Lendlease have carried out extensive public consultation and engagement with residents and businesses within the Order Land and the wider community on the regeneration proposals. Through the various consultation processes, residents and businesses within the Order Land and the wider community have had the opportunity to make representations to the Council and Lendlease on the regeneration proposals and on key proposals to mitigate the effects of the Order on the community. The views of remaining objectors will be considered by the Secretary of State before reaching a decision on confirmation of the Order.
- 11.11 If the Secretary of State confirms the Order, the powers of compulsory acquisition conferred by the Order will be exercised for the purpose of acquiring those interests included in the Order Schedule which have not already been acquired by agreement. As explained in section 12 of this Statement, efforts to acquire the relevant interests are ongoing. Further, all those whose interests are compulsorily acquired will be entitled to fair compensation to be assessed in accordance with the Land Compensation Acts 1961 and 1973 (and other land compensation legislation), such compensation to be determined independently by the Upper Tribunal (Lands Chamber), if it cannot be agreed.
- 11.12 In light of the above, the Council is of the view that there is a clear and compelling case in the public interest for the compulsory acquisition of each and every parcel of land and the rights comprised in the Order Schedule. It considers that the public interest that is to be served by the Scheme and the wider social, environmental and economic benefits to be realised as a result of the Scheme outweigh the necessary interference with the private rights and interests that exist in the Order Land. Appropriate compensation will be available to those entitled to claim it under the relevant statutory provisions. The Council, therefore, believes that in making the Order it has struck a fair and proportionate balance between the interests of those whose Convention rights will be affected and the wider public interest.
- 11.13 **Equality Act 2010**
- 11.14 In discharging all of their functions, public authorities are bound by the Public Sector Equality Duty set out in section 149 of the Equality Act 2010. In exercising their compulsory purchase and related powers the Council as acquiring authority (and the Secretary of State as confirming authority) must have due regard to the need to:-
- 11.14.1 eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the 2010 Act;
 - 11.14.2 advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
 - 11.14.3 foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 11.15 The "relevant protected characteristics" are:-
- 11.15.1 pregnancy and maternity;
 - 11.15.2 sexual orientation;
 - 11.15.3 sex;
 - 11.15.4 gender reassignment;
 - 11.15.5 religion or belief;
 - 11.15.6 race;
 - 11.15.7 age; and

11.15.8 disability.

- 11.16 The Council has acted in accordance with its Public Sector Equality Duty at each stage of the key decision-making for the Regeneration Scheme. The Council has developed and updated the Equalities Impact Assessment (“EqlA”) for the Regeneration Scheme when making recommendations to Cabinet as it has progressed and has also produced specific assessments for relevant housing policies. The findings of the assessments have been monitored and informed subsequent decisions on the Regeneration Scheme.
- 11.17 The Council commissioned an EqlA for the Scheme to accompany its report to Cabinet at its meeting of November 2022 recommending the use of compulsory purchase powers to deliver the Scheme. The EqlA was produced by Mott MacDonald. The EqlA has found that the delivery of the Scheme is likely to bring a range of benefits which would particularly benefit those sharing protected characteristics in the local community, through improved housing provision, the changes in employment and training opportunities, provision of community resources and improved social cohesion, measures to improve public safety, and measures to improve connectivity and accessibility after the development.
- 11.18 For residents within the Scheme, the EqlA assesses that there are likely to be no adverse impacts for those with protected characteristics for the qualifying tenants and resident leaseholders who are eligible to move to a new home in the Scheme pursuant to the Landlord Offer, if the existing mitigation measures agreed by the Council are implemented. These measures include providing the right to remain on the estate for eligible existing residents, covering reasonable costs for the moves to the new homes, keeping Council rents at a similar level to the existing Love Lane properties, providing support through the Council's Rehousing & Engagement Team at each stage of the move process and ensuring access to independent advice from an Independent Tenant & Leaseholder Advisor (ITLA). Both the Rehousing & Engagement Team and the ITLA will provide support and advice on an individual basis and respond to the specific needs of each household, recognising where residents may be disproportionately affected or face specific barriers.
- 11.19 There may be some residual adverse impacts for groups with protected characteristics who rent privately and may not be able to remain in the local area, which is likely to particularly affect ethnic minority groups, children and women, who are overrepresented in the demographic makeup of this group. The impacts are likely however to be minor given the limited number of private tenants, who are understood to make up less than 15% of the residents within the Order Land. The Council has set out mitigation measures to reduce these impacts as far as possible. The Rehousing and Engagement team will liaise with individual households to ensure they are aware of the phasing timelines and of the options available to them. Tenants will have access to Haringey's Housing Services to provide support and assistance, and to independent advice from the ITLA which as above will recognise their specific needs. The Council will ensure that that the process for private tenants to access housing support is clear and communicated to these residents, including by providing information in other languages and interpreter support as required.
- 11.20 There are 15 businesses located within the Scheme who will be impacted as a result of the redevelopment. For these business owners and their employees, the EqlA assesses that there are likely to be limited adverse effects on persons sharing protected characteristics, particularly as a number of businesses on site are minority ethnic-owned. Any potential loss of business, potential redundancy of employees associated with business loss or relocation, or impact on the existing customer base, would particularly affect ethnic minority groups and children, due to these being disproportionately represented in the study area. It may also particularly impact older people and disabled people due to their specific needs.
- 11.21 The Council has set out mitigation measures to reduce these impacts on business owners and employees as far as possible. The mitigation measures include the following:-
- 11.21.1 provision of relocation support and aim to relocate businesses within the Scheme if possible, or elsewhere within the borough if not;
 - 11.21.2 phasing of redevelopment to provide opportunities for businesses to make a single move to new accommodation in the Scheme, or provide temporary space where this is not possible (where the business can be accommodated within the Scheme);

- 11.21.3 commitment to regular communication and engagement with businesses, including to discuss relocation options and to develop the designs for the new commercial spaces in the Scheme and business support initiatives;
 - 11.21.4 Businesses will be offered a compensation package for the loss of and any damage to the business, including removal expenses, adaptation of replacement premises, temporary loss of profit during the move, diminution of goodwill following move and depreciation in value of stock. Reasonably incurred professional fees will also be reimbursed by the Council;
 - 11.21.5 Businesses will be independently valued by a surveyor who can be appointed by the business owner, with reasonable costs reimbursed by the Council; and
 - 11.21.6 Commitment to work with businesses to help them develop individual business plans.
- 11.22 The EqIA has identified that the delivery of the Scheme has the potential to provide improved living conditions for local residents, as well as enhancements to housing quality, accessibility, the public realm, and other community facilities. Furthermore, the Council have embedded a series of mitigations within the design and delivery of the Scheme in order to mitigate and manage risks associated with potential changes in social conditions which can arise from scheme programmes of this kind.
- 11.23 The EqIA and equalities impacts will be monitored and reviewed throughout the progression of the Scheme in order to ensure that the mitigation measures are being delivered, and that any future impacts can be measured and mitigated as necessary.

12. **EFFORTS TO ACQUIRE AND RELOCATION STRATEGY**

12.1 **Existing ownership within the Scheme**

12.1.1 **Council Ownership**

12.1.2 The Council owns the freehold interest in over 80% of the Order Land.

12.1.3 The Council's ownership includes the freehold of the Love Lane Estate. Section 4.5 of this Statement provides a breakdown of tenure within the 297 residential properties on the Love Lane Estate.

12.1.4 **Third Party Ownership**

12.1.5 The properties located on the eastern boundary of the Order Land, fronting onto the High Road, are contained with 15 freehold titles. The properties generally consist of commercial units on the ground floor with residential accommodation above. In summary:

- (a) the Council owns 3 freehold titles (731, 743 and 753 High Road);
- (b) Canvax Limited (which the Council understands is affiliated to THFC) owns 5 freeholds titles (733, 735, 737, 741 and 751 High Road);
- (c) the Tryfonos family own 5 freeholds titles (745, 747, 749, 755 and 757 High Road) and the leasehold title of flat 8 Kathleen Ferrier Court, Brereton Road;
- (d) the freehold to 739 High Road is owned by Mr Ahmet Dellal; and
- (e) the freehold to 759 (currently the Tottenham Health Centre) is owned by Kingwell Investments Limited.

12.1.6 An electricity sub-station, owned by Eastern Power Networks plc is also located within the Order Land.

12.1.7 Negotiations

12.1.8 The Council and Lendlease have sought to acquire all of the required interests within the Order Land by agreement, as summarised in the following paragraphs.

12.1.9 As would be expected for a scheme of this size, there remain a number of interests where it is expected that compulsory purchase powers will need to be exercised either because reasonable terms cannot be agreed for private treaty acquisition or because it has been difficult to make contact with the owner or occupier.

12.1.10 As required by best practice, the Council and Lendlease have and will continue to seek to acquire the outstanding interests within the Order Land by agreement. This is evidenced by the Council's recent acquisition of the freehold interest to 753 High Road. However, the Council considers that it is highly unlikely that it will be able to achieve the assembly of the entirety of the Order Land by agreement within a reasonable timescale without the use of compulsory purchase powers.

12.1.11 Housing assistance for tenants and leaseholders on the Love Lane Estate

12.1.12 In 2021, the Council adopted a Landlord Offer for residents on the Love Lane Estate which sets out their housing offer and builds on previous policies and consultations, including the Secure Tenant Guide. The Landlord Offer was the subject of the positive resident ballot in 2021 and is consistent with best practice guidance set out in The Mayor of London's Good Practice Guide to Estate Regeneration (February 2018) and DLUHC Estate Regeneration National Strategy 2016.

12.1.13 The offer to leaseholders is also expanded upon specifically in the Love Lane Leaseholder Offer, which was also adopted by the Council in 2021. The offer to private tenants is captured in the High Road West Private Tenant Guide, adopted by the Council in 2014.

12.1.14 The guarantees to residents are summarised in the following paragraphs.

12.1.15 All secure Council tenants on the Love Lane Estate will:-

- (i) be offered a new, high quality, modern Council-owned home in the redevelopment area that meets their needs;
- (ii) continue to pay Council rent at a similar level to what they pay now;
- (iii) continue to have a long-term tenancy;
- (iv) have a dedicated re-housing officer to support them through the whole moving process;
- (v) receive 'Home Loss' compensation, with all reasonable moving costs paid;
- (vi) have adaptations made within the new property where required; and
- (vii) have a voluntary early move if they choose.

12.1.16 All resident leaseholders on the Love Lane Estate will:-

- (i) receive the market value for their home plus a home loss payment of 10%;
- (ii) have all reasonable legal and moving costs paid;
- (iii) have access to several rehousing options, including:-
 - (i) buying a home in the Scheme with an enhanced rent and interest-free equity loan offer from the Council, who will contribute up to 75% of the value of the new property;

- (ii) buying a home elsewhere in the borough with a rent and interest-free equity loan offer from the Council, who will contribute up to 40% of the value of the new property;
- (iii) a leasehold swap option, where a leaseholder can buy and own the leasehold of a Council-owned property of equivalent value; and
- (iv) option to buy a property on the open market without financial support from the Council.

12.1.17 Eligible non-secure tenants in temporary accommodation on the Love Lane Estate will:-

- (i) be offered a new, high quality, modern Council-owned home in the redevelopment area that meets their needs;
- (ii) be offered a secure tenancy at Council rent in this new Council-owned home in the redevelopment area;
- (iii) have a dedicated re-housing officer to support them through the whole moving process;
- (iv) have all reasonable moving costs paid; and
- (v) have adaptations made within the new property where required.

12.1.18 For non-secure tenants to be eligible, they will need to have both lived on the Love Lane Estate and have been accepted as homeless by the Council for at least six months prior to the publication of the Landlord Offer (published in July 2021).

12.1.19 All private tenants will receive timely, one-to-one advice on their re-housing needs and options.

12.1.20 Rehousing of secure and non-secure tenants on the Love Lane Estate

12.1.21 As noted above, within the Landlord Offer the Council has provided guarantees to existing secure and non-secure tenants that they will be prioritised for the new Council homes delivered within the Scheme. This is achieved by the Council's Local Lettings Policy, adopted by the Council's Cabinet in July 2021.

12.1.22 Although the Council is required to list all existing Council tenants within the Order and notify such tenants of the making of the Order, the Council's preference is to secure vacant possession by means other than the Order.

12.1.23 The Council's preference is to obtain vacant possession of the remaining units occupied by secure and non-secure tenants by mutual agreement through an offer of suitable alternative accommodation. This includes the new Council homes to be delivered as part of the Scheme.

12.1.24 A dedicated rehousing team in the Council is in place to undertake housing need assessments to inform the allocation of the new homes. Rehousing officers are available to meet households on a one-to-one basis and get to know their needs and requirements. Support in the move process includes help with removals, disconnecting and reconnecting appliances, and packing/unpacking. The rehousing team will also arrange for any adaptations required in the new properties prior to the resident moving in.

12.1.25 In the event secure tenants do not wish to move into the Scheme they also have priority banding to bid for social homes elsewhere in the borough and to make a voluntary early move.

12.1.26 If the Council cannot reach mutual agreement with secure tenants, following an offer of suitable accommodation being made (including the new Council home in the Scheme), it may seek to obtain vacant possession of units occupied by secure tenants through

possession proceedings under section 83 of the Housing Act 1985 and Ground 10A of Part II to Schedule 2 of that Act. If the Ground 10A process does not deliver vacant possession of the properties within the programme timescale, the Order will provide certainty that the Scheme can progress in accordance with its programme.

- 12.1.27 The use of Ground 10A powers would not be required for properties which are subject to non-secure tenancies (as secure tenants have additional security of tenure). When serving notices to quit, the Council will be required to demonstrate that suitable alternative accommodation has been offered. The Council has committed to do this through the guarantees to non-secure tenants set out above.
- 12.1.28 **Efforts to acquire resident and non-resident leasehold interests on the Love Lane Estate**
- 12.1.29 Properties on the Love Lane Estate where a long leasehold interest has been acquired by a third party are included within the Order. The Council has contacted all such leaseholders with a view to acquiring their interests by private treaty.
- 12.1.30 Negotiations with resident and non-resident leaseholders on the Love Lane Estate commenced in 2014. Since that time, the Council has acquired 44 of the 85 interests that were present at that time. These negotiations will continue in tandem with progression of the Order.
- 12.1.31 Where appropriate, the Council has also supported leaseholders to access their rehousing options within the Love Lane Leaseholder Offer and Leaseholder Guide (see further at Section 3 above) and will continue to do so as negotiations progress.
- 12.1.32 **Efforts to acquire commercial/retail owners and occupiers and associated residential property along the High Road**
- 12.1.33 The Council's Business Charter sets out the commitment to a fair and equitable valuation and compensation process for businesses.
- 12.1.34 Lendlease and its property advisors CBRE are leading on the negotiations with commercial owners and occupiers and associated residential premises. Since 2018 all third-party landowners and tenants have been contacted on numerous occasions via written correspondence offering one-to-one meetings. Further subsequent dialogue has taken place either through phone calls, emails or meetings.
- 12.1.35 Since 2018, meetings have taken place with all but one (Mr Ahmet Dellal) of the freehold and long leasehold owners of the commercial and residential premises on the High Road.
- 12.1.36 In February 2022, the Council wrote to landowners within the Scheme confirming that the Council and Lendlease were seeking to focus on delivery of Phase A of the Regeneration Scheme and would like to seek to reach mutual agreement with owners for the purchase of their interest in the Order Land. This was followed by a letter from Lendlease in May 2022 within which Lendlease re-confirmed it and the Council's desire to acquire interests within the Order Land by agreement.
- 12.1.37 In October 2022, letters were sent to the business and residential occupiers of the High Road properties within the Order Land (other than the Tryfonos family due to ongoing discussions that were taking place at that time) as well as Mr Ahmet Dellal. This provided the occupiers with an update on the progress of Phase A of the Regeneration Scheme and invited the occupants to meet with Lendlease and the Council to discuss acquisition and relocation. At the same time, letters were sent to residential tenants along the High Road providing an update and inviting residents to contact Lendlease or the Council with any queries about the Regeneration Scheme.
- 12.1.38 This ongoing engagement has now led to the Council's recent acquisition of 753 High Road on 31 March 2023.

- 12.1.39 More recently, correspondence has been sent to all commercial occupiers updating them on the current timetable for delivering the Scheme as well as highlighting the options for relocating within the Scheme. Further information regarding the Council and Lendlease's approach to securing vacant possession of the commercial properties along the High Road is set out below.
- 12.1.40 A summary of specific negotiations with major landowners to date is also set out below. Where a major landowner has objected to the Order a full response to the objection is contained within Appendix 1 to this Statement. The plot numbers of the land interests in relation to the Order Schedule are also listed.
- 12.1.41 **THFC – Plots 45, 46, 47, 48, 48a, 51, 67, 77, 78**
- 12.1.42 THFC own 733, 735, 737, 741 and 751 High Road, and the leasehold title of flat 3 Ermine House, Moselle Street (albeit the registered proprietor of such properties is Canvax Limited).
- 12.1.43 Since 2018, Lendlease have led on the discussions with THFC and have had approximately 40 meetings. The topics discussed have included the acquisition of THFC's landholdings required to deliver the Regeneration Scheme, including those within the Order Land. A summary of the consultation undertaken with THFC is set out in Section 3.35-3.43 above.
- 12.1.44 In particular, a meeting held between Lendlease and THFC in September 2020 discussed the acquisition of all the land and property required to deliver the Regeneration Scheme. As part of this meeting an offer was made to THFC for the acquisition of all its land and property required to deliver the Regeneration Scheme. This was declined.
- 12.1.45 Lendlease continued its efforts with THFC and a further email seeking engagement regarding its land and property within the Scheme was sent in May 2022. THFC responded confirming that it would be premature to discuss any CPO prior to the grant of the Planning Permission.
- 12.1.46 A further letter seeking engagement was sent in October 2022, following the grant of the Planning Permission. No response to the letter has been received.
- 12.1.47 Notwithstanding the above and the subsequent decision by THFC to seek permission to apply for judicial review the Planning Permission, a written offer to purchase the interests owned by THFC within the Order Land was made in January 2023.
- 12.1.48 THFC responded in March 2023 confirming that, in light of THFC's continuing objection to the form of development permitted pursuant to the Planning Permission, it would be premature to discuss the written offer made in January. CBRE responded to the letter in April 2023 noting that the Council and Lendlease remain willing and ready to negotiate with THFC for the acquisition of its interests within the Order Land.
- 12.1.49 **The Tryfonos family – Plots 41, 72, 73, 74, 75, 76, 81, 82, 83**
- 12.1.50 The Tryfonos family own the freehold title to 745, 747, 749, 755 and 757 High Road, the long leasehold title to 755a High Road, and the leasehold title of flat 8 Kathleen Ferrier Court, Brereton Road. It is understood that members of the Tryfonos family live in two of the residential premises located above the shops (755 and 757 High Road) and that family members own and operate the Chick King fast food restaurant (755 High Road) and K&M Stores shop (745 High Road).
- 12.1.51 The Tryfonos family have been a long-time objector to the inclusion of the High Road properties within the Scheme.
- 12.1.52 Notwithstanding this, there been a considerable amount of correspondence with the Tryfonos family regarding their family's interests within the Order Land. Since 2014, the Council has had many meetings with Alecos Tryfonos (who leads discussions on behalf of the wider family who have interests in the Order Land).

- 12.1.53 Since 2018, Lendlease (with CBRE) have progressed discussions and have had numerous engagements with Alecos Tryfonos. There have been three formal engagements (2 August 2018, 28 June 2022 and 23 November 2022) while Lendlease (alongside CBRE) have met Alecos Tryfonos in his shop (Chick King) on numerous occasions. Alecos Tryfonos has also attended a number of drop-in sessions organised by both the Council and Lendlease.
- 12.1.54 During the meetings, discussions have included updates on the delivery timetable and programme for the Scheme, and opportunities for relocation inside and outside of the Scheme. This specifically included the relocation of the Chick King business within the Scheme. During the latest meeting Lendlease detailed specific locations within the Scheme that it thought would be suitable for the relocation of the Chick King business. In addition, outline discussions on the potential commercial arrangements that could be offered to the Tryfonos family were provided.
- 12.1.55 Furthermore, discussions were also had regarding the family's wider property holdings, specifically the residential property where some of the family currently resides. These discussions included opportunities for replacement premises within the Scheme.
- 12.1.56 The Council made a written offer in April 2015 to purchase all properties owned by the Tryfonos family within the Order Land. This was declined.
- 12.1.57 During the meeting in August 2018, CBRE (on behalf of Lendlease) made a verbal offer which was also declined.
- 12.1.58 A further written offer to acquire the interests held by the Tryfonos family within the Order Land was made in January 2023. The offer was declined verbally by Alecos Tryfonos during a phone call with CBRE on 17 January. It was explained to Mr Tryfonos that consideration would be given to the reasons for the offer being declined in the hope an agreement can be reached. A further written offer seeking to address some of the comments received from Mr Tryfonos was made in May 2023.
- 12.1.59 **Mr Ahmet Dellal – Plots 49, 49a, 50**
- 12.1.60 Mr Dellal was sent numerous letters prior to the making of the Order within which the Council and Lendlease outlined their desire to acquire Mr Dellal's interests in the Order Land. No response was received to any of the letters sent.
- 12.1.61 However, Mr Dellal submitted two objections to the Order. One objection was submitted by Mr Dellal, the second was submitted on his behalf by Keith Murray Consultants. Following receipt of the objections Lendlease wrote to Keith Murray Consultants in April 2023 requesting a meeting to discuss the acquisition of Mr Dellal's interest in the Order Land.
- 12.1.62 Keith Murray Consultants have recently confirmed that Mr Dellal does not currently wish to meet with CBRE or Lendlease to discuss the potential acquisition of his interest in the Order Land.
- 12.1.63 Notwithstanding this, CBRE are continuing to engage directly with Keith Murray Consultants with a view to providing a written offer to acquire Mr Dellal's interests.
- 12.1.64 **Kingwell Investments Limited – Plot 84**
- 12.1.65 Negotiations with Kingwell Investments Limited regarding its interest within the Order Land are ongoing.
- 12.1.66 The tenants of (Tottenham Health Centre – GP Surgery) are the owners of Kingwell Investments Limited.
- 12.1.67 As noted in further detail in Section 12.2.10 below, the Planning Permission grants consent for the provision of a new health centre within the Scheme. In light of this, a number of meetings have taken place with the agents for the owners of Kingwell Investments Limited

during which options for the relocation of the business within the Scheme (including commercial terms, access to parking and timescales) have been discussed.

- 12.1.68 These discussions are ongoing and it is hoped that an agreement for the acquisition of the freehold and leasehold interests in Plot 84 and relocation of the existing business within the Scheme can be reached.

12.2 Existing businesses on the High Road

12.2.1 Vacant Possession

- 12.2.2 As set out within Section 7 of this Statement, the Scheme will be delivered in a number of sub-phases.

- 12.2.3 The current phasing is as set out at Section 7.39-7.47 of this Statement.

- 12.2.4 The properties located along the High Road and located within the Order Land are contained within Phases 4 and 5.

- 12.2.5 On the basis of the current phasing and delivery timetable, it is envisaged that:

- (a) vacant possession of 731-741 High Road (being Plots 44-51 of the Order Schedule) will be required in Q1 2027; and
- (b) vacant possession of 743-759 High Road (being Plots 69 – 84 of the Order Schedule) will be required in Q2 2028.

- 12.2.6 With a view to providing the occupiers of the High Road properties with additional comfort and security, the Council and Lendlease do not intend to rely on the Order to obtain vacant possession of:

- (a) 731-741 High Road, in advance of Q1 2025; and
- (b) 743-759 High Road, in advance of Q2 2026.

- 12.2.7 These “not before” dates are intended to give the owners and occupiers of those properties a significant level of reassurance to enable them to make arrangements for the future planning of their businesses. It will be noted that these dates precede the dates stated in Section 7 above as those on which vacant possession of the High Road properties will be required pursuant to the current delivery timetable. That is because Lendlease requires a degree of flexibility in the event the delivery of the Scheme (and the associated benefits) is accelerated.

12.2.8 Business Relocation

- 12.2.9 The Scheme, as consented by the Planning Permission, has been designed to offer modern accommodation suitable for a range of retailers and commercial occupiers. The Scheme, as consented by the Planning Permission, provides for up to 8,000 sqm GEA of commercial space (Use Class E(a-e)) and 2,150 sqm of office and industrial floorspace (Class E(g)). This includes provision for a new health centre as well as new retail space fronting onto the High Road and the new public square, both of which will provide locations that are expected to experience high footfall. It is understood that the existing businesses on the High Road within the Order Land together occupy in the region of 1,800 sqm GEA of Class E floorspace.

- 12.2.10 The section 106 Agreement entered into alongside the Planning Permission requires Lendlease to provide a health centre within the Scheme if, prior to the demolition of the existing health centre located on the High Road and owned by Kingwell Investment Limited, a health centre has not been provided within the vicinity of the Scheme pursuant to one of two extant planning permissions. In any event, and as evidenced by the existing discussions with the owners of the existing health centre (see Section 12.1.67 above), Lendlease currently plans to relocate the existing health centre within the Scheme.

- 12.2.11 Furthermore, the section 106 Agreement requires Lendlease to produce a Business Relocation Strategy to assist with the temporary and permanent relocation of the existing businesses located along the High Road within the Scheme. The Business Relocation Strategy builds upon and incorporates the commitments contained within the Business Charter and requires Lendlease to a) prioritise the relocation of existing businesses to designated commercial floorspace within the Scheme b) minimise the level of operational disruption on the operations of the existing businesses c) work with existing businesses and secure local agent support in order to prepare potential relocation options based on the individual requirements and d) provide independent business and relocation advisory support.
- 12.2.12 Lendlease has also committed via the section 106 Agreement to offer space within the Scheme exclusively to existing businesses subject to prescribed terms. These include a minimum lease term of 5 years and the choice of a discounted rent for the first five years, an extended rent free period or a capital contribution towards the fit out of the new premises.
- 12.2.13 Although vacant possession of the High Road properties is not required before Q1 2025, with a view to providing businesses with as much support and information as possible, Lendlease has continued to engage with the existing businesses and specifically recently on the options for relocating both within and outside of the Scheme. This is evidenced by the negotiations with a number of the major landowners set out within Section 12 above, as well as via the recent Business Support Leaflet that has been sent to all the businesses along the High Road.
- 12.2.14 By reason of the Planning Permission granting outline consent for the majority of Phase A, the detailed design of Plots B-G has yet to be fully worked up and approved. However, the phasing of the Scheme and the fact that vacant possession of the High Road properties is not required before Q1 2025 enables the detailed design to be progressed in parallel to the discussions with the existing businesses regarding relocation. This ongoing dialogue will influence the detailed design as it will identify which of the existing businesses intend to relocate within the Scheme.
- 12.2.15 Lendlease will continue to engage with the existing businesses with a view to facilitating their successful relocation either within or outside of the Scheme.
- 12.2.16 In addition to the above, the Council and Lendlease will consider any requests for advance payments of compensation received and/or consider serving a notice of entry or general vesting declaration earlier than required, with a view to providing impacted business owners with early access to funds to further facilitate relocation.
- 12.2.17 **Acquisition of rights**
- 12.2.18 The Council and Lendlease have contacted those with an interest in the land over which new rights are required in order to deliver the Scheme with a view to obtaining the necessary rights by agreement.
- 12.2.19 **Owners of Existing Rights**
- 12.2.20 An assessment of the potential for the Scheme to impinge upon existing rights to light enjoyed by land adjoining the Order Land has been carried out and identified (on a precautionary basis adopting the largest Scheme parameters) a number of potential injuries to land interests held by owners of surrounding buildings. The properties and interests that are potentially affected are included in Table 2 of the Schedule to the Order. Those parties who may suffer an interference have been contacted by letter. The Council and Lendlease are willing to enter into arrangements with those parties affected with a view to agreeing the level of compensation for interferences with rights to light in the event that the Scheme proceeds. Parties who have engaged on rights to light matters have been advised of this.
- 12.2.21 There are a significant number of other rights and similar interests which affect parts of the Order Land. These are mainly rights attaching to freehold or leasehold interests within the

Order Land, and the relevant rights would fall away once those interests are acquired by the Council.

12.2.22 **Unknown Owners**

12.2.23 Other than areas of sub-soils beneath roads and pavements, there are four parcels of unregistered land (plots 33, 56, 85 and 105 (in respect of mines and minerals)). Site notices in respect of these plots have been posted as part of the land referencing process, to seek to identify the owners of the land. Site notices were also placed around the Order Land following the making of the Order in respect of these plots as well as those unregistered plots which sit beneath roads and pavements.

12.2.24 **Streets**

12.2.25 Sections of streets are included in the Order Land where necessary, including those within the Scheme area and where relevant those adjacent to it. Parts of the streets will be subject to stopping up applications where this is necessary to allow the Scheme to proceed (see further in section 14 of this Statement).

12.2.26 **Utilities and statutory undertakers**

12.2.27 Information on statutory undertakers and apparatus within the Order Land has been gathered through the land referencing process, utilities searches and discussions with utility providers.

12.2.28 The Order Land provides for the acquisition of new rights over operational land of Network Rail Infrastructure Limited to the east of the railway line. The Order Land provides for the acquisition of operational land of Eastern Power Networks Plc, occupied by UK Power Networks (Operations) Limited to the west of the High Road and upon which a substation is located.

12.2.29 There are a number of utility networks in and around the Order Land, as would be expected for an urban development site with a large number of buildings on site.

12.2.30 The Scheme will require various works in relation to existing services, including removal and diversion works.

12.2.31 Multiple small diameter low pressure gas mains are located throughout the Order Land, including a strategic medium to low pressure reducing station (PRS). The PRS is responsible for the gas network within the wider area and must therefore be maintained to ensure continuity of service. A new PRS will be constructed as part of the Scheme which, once operational, will replace the existing PRS.

12.2.32 There are other statutory undertakers and utility providers with assets within the Order Land, including for the provision of water, sewerage, and telecommunications a large element of existing apparatus within the Order Land services the existing buildings within the Order Land that will be demolished and redeveloped. As such this apparatus will either a) no longer be required and will be removed as part of the early works relating to each part of the Scheme with new apparatus to serve the Scheme put in place as each part of the Scheme comes forward b) be relocated with the agreement of the affected statutory undertakers or c) retained to ensure continuity of service.

13. **SPECIAL CONSIDERATIONS**

13.1 There are no areas of special category land (such as open space, commons or allotments) included within the Order Land.

13.2 Two plots within the Order Land (124 and 125), over which new rights are sought, are owned by or have interests owned by a company which has been dissolved. Property of dissolved companies' vests in the Crown, until sold or disclaimed by the relevant Crown authority, and the Council therefore considers that the relevant plots may be Crown land. Interests in Crown land owned by the Crown

cannot be compulsorily acquired. The Council / Lendlease have contacted the relevant Crown authority to determine the position, and to seek to acquire the interests required by agreement.

13.3 The Order Land includes a number of listed and locally listed non designated heritage assets, specifically:-

13.3.1 **Pink Land**

- (a) Nos. 743-757 High Road N17 (odd) (locally listed);
- (b) No.759 High Road N17 (former Whitehall Tavern PH) (locally listed); and
- (c) Electricity Substation (adjoining library) (locally listed).

13.3.2 **Blue Land**

- (a) Nos. 773-779 High Road N17 (locally listed);
- (b) 7 White Hart Lane (Grade II Listed); and
- (c) 34 White Hart Lane (Grade II Listed).

13.4 A small part of the Order Land (Blue Land) is contained within the North Tottenham Conservation Area. No buildings within the North Tottenham Conservation Area are intended to be demolished as part of the Scheme and none of the North Tottenham Conservation Area is included within the land to be acquired pursuant to the Order.

14. **ASSOCIATED ORDERS**

14.1 Paragraph 15 of the 2019 Guidance requires acquiring authorities to be able to show that the scheme is unlikely to be blocked by any physical or legal impediments to implementation. It references the programming of any infrastructure accommodation works and the need for any planning permission or other consent or licence.

14.2 As explained in section 5 of this Statement, planning permission has been granted for the Scheme.

14.3 In order to implement the Planning Permission and deliver the Scheme, parts of Love Lane, Moselle Street and Whitehall Street will need to be stopped up.

14.4 In addition, a number of existing footpaths which run across the Order Land will either need to be stopped up or diverted to enable the Scheme consented pursuant to the Planning Permission to proceed.

14.5 The stopping up or diversion of the existing highways is proposed to be secured via one or more stopping up orders under section 247 of the Town and Country Planning Act 1990 as the relevant phases of the Scheme come forward.

14.6 In light of Plot A being the first plot to be delivered, an application made pursuant to section 257 of the Town and Country Planning Act 1990 to stop up the existing footpath which runs between Headcorn Street and Tenterden Road has been submitted to the Council and is currently being determined.

14.7 The required application(s) to secure the above are being/will be progressed by Lendlease.

15. **OBJECTIONS**

15.1 A summary of the Objections, along with details of the Council's response to each, is set out at Appendix 1.

16. CONCLUSION

- 16.1 The implementation of the Scheme will result in the transformation of the High Road West area by providing a high quality residential-led mixed-use development which will create a balanced, mixed and inclusive community and a new destination in the borough whilst also acting as a catalyst for further growth, regeneration and improvements to the wider area. This will improve the quality of life for existing and future residents and provide increased opportunities and economic benefits for businesses and the wider community. In order to achieve this, the compulsory acquisition of interests in the Order Land specified in the Schedule to the Order are required so that if the Council is unable to acquire all such interests by private treaty it will still be able, within a reasonable timescale, to deliver the Scheme.
- 16.2 The Council considers that implementation of the Scheme will bring about the transformation of the area and is satisfied there is a compelling case in the public interest for the Order to be confirmed so as to secure the redevelopment and improvement of the Order Land through the delivery of the Scheme. This will result in significant improvement in the economic, social and environmental wellbeing of the area.
- 16.3 The Council has set out above how the Order and the Scheme meet the relevant statutory requirements and those in the 2019 Guidance.
- 16.4 The Scheme accords with national and local planning policies as set out in section 6 of this Statement.
- 16.5 The Scheme will deliver a quantitative increase and qualitative improvement and better mix of housing and wider well-being benefits for residents and businesses as set out in section 9 of this Statement:-
- 16.5.1 the Council has a development agreement with an experienced development partner with proven track record of delivering comparable schemes;
 - 16.5.2 funding will be available to cover the costs of land acquisition/compensation, construction and associated costs;
 - 16.5.3 the Council already owns over 80% of the Order Land and only it and Lendlease can deliver the Scheme; and
 - 16.5.4 subject to confirmation of the Order, there are no impediments to the Scheme proceeding.
- 16.6 The Council, therefore, requests the Secretary of State to confirm the Order.

17. OTHER INFORMATION OF INTEREST TO PERSONS AFFECTED BY THE ORDER

- 17.1 Parties affected by the Order who wish to discuss matters with a representative of the Council should contact the Case Manager for the Order:-
- 17.1.1 Scott Mundy, Regeneration Manager, Haringey Council – scott.mundy@haringey.gov.uk - 07971 837641
- 17.2 Those parties affected by the Order who wish to discuss the purchase of their interest by agreement should contact:-
- 17.2.1 For residential properties within the Love Lane Estate - Scott Mundy, Regeneration Manager, Haringey Council – scott.mundy@haringey.gov.uk - 07971 837641
 - 17.2.2 For all other interests within the Order Land - Steven Fraser, Lendlease – steven.fraser@lendlease.com – 07918 628193; and James Franklin, CBRE – james.franklin@cbre.com – 07917 894383
- 17.3 For those parties wishing to know more about the Scheme and the Regeneration Scheme as a whole or who have questions about the Order, further information can be downloaded from the following website: www.haringey.gov.uk/HRW-CPO

17.4 The Royal Institution of Chartered Surveyors (RICS) operates a compulsory purchase helpline which provides initial free advice. Those parties wishing to make use of that service should contact RICS via its website: www.rics.org

17.5 **Covid-19 and Language of Documents**

17.6 The Council considered whether there were any specific implications of Covid-19 which should be taken into account in making and publicising the Order. The Council was satisfied that there were no specific implications of Covid-19 which required to be taken into account when making the Order and will keep this under review during the process.

17.7 The Council has consistently made information available in a variety of formats and languages (i.e., braille, audio, large print or translated) that ensure that information provided to residents, businesses and other stakeholders is as clear, concise and easy to understand as possible, and will continue to do so as the Order and Scheme progress.

18. **CORE DOCUMENTS**

18.1 A list of the documents which the Council may refer to at the public inquiry are listed in Appendix 2. The list is not exhaustive, and the Council may also refer to additional documents.

19. **INSPECTION OF THE ORDER AND ORDER DOCUMENTS**

19.1 Copies of the Order, Order Map, this Statement and the documents listed in Appendix 2 have been deposited at The Grange Community Hub, 32 White Hart Lane, London, N17 8DP and may be seen in hard copy between 9am and 5pm, Monday to Friday. The Council's preference is that this is by prior appointment where possible – contact Scott Mundy at the Council on 07971 837641 or at scott.mundy@haringey.gov.uk.

19.2 Documents relating to the Order can be downloaded from the website via the following link:
<https://gateleyhamer-pi.com/en-gb/high-road-west/>

APPENDIX 1

High Road West Phase A CPO – Responses to Objections

	Party		Objection	Response
Obj 1	Done Brothers (Cash Betting) Limited trading as Betfred Limited C/o Gerald Eve LLP	1.	Betfred does not wish to be deprived of its rights over the Property.	The Order does not seek to acquire any new rights over the objector's property.
		2.	The Council has not provided any information on the impact of the Order on Betfred's ability to continue trading.	The rights to enable construction of the Scheme are not sought over the objector's property. The objector's inclusion in respect of a possible infringement of a right of light was done on a cautionary basis. Although the Scheme will be delivered in the vicinity of the property, it is not considered that the confirmation of the Order and the carrying out of the Scheme will have any impact on objector's ability to trade from its property.
		3.	No direct contact nor offer has been made by the Council prior to making the CPO to acquire the rights.	The Order does not seek to acquire any new rights over the objector's property.
		4.	Betfred is willing to negotiate rights with the Council so compulsory purchase powers are unnecessary for the rights being acquired.	The objector is included within the Order as benefiting from a potential right of light that may be impacted by the Scheme. The objector is also included within Table 2 of the Order in respect of the proposed acquisition of rights over land in the vicinity of the objector's property. The inclusion of the objector within the Order in respect of the Scheme's potential to impact an existing right of light was notified to the objector within letters from the Council in June 2022 and January 2023. Within those letters the Council provided updates on the CPO process as well as confirming that the Scheme had the potential to interfere with existing rights of light but that, due to the outline nature of the Planning Permission, any impact would not be known until the detailed design of the Scheme had progressed.

	Party		Objection	Response
				<p>The inclusion of the objector's property within the Order does not confirm that the property currently benefits from a right of light, simply that if it does, such right has the potential to be impacted.</p> <p>Following receipt of the objection, the Council has been in dialogue with the objector with a view to explaining the likely impacts of the Scheme on the objector's property as well as obtaining further information with a view to ascertaining the extent of any right of light which may exist.</p>
		5.	The Council has not demonstrated sufficiently compelling grounds in the public interest to justify interfering with Betfred's right under the ECHR.	The Council has had due regard to all statutory requirements and Government guidance in exercising its compulsory purchase powers and considers that there is a compelling case in the public interest. Furthermore, the Council has taken full account of the rights of individuals under the ECHR in resolving to make the Order.
		6.	There are no compelling grounds for the Order to be confirmed to enable the acquisition of the rights over the Property.	
Obj 2	Mr Ahmet Huseyin Dellal Separate objection received from Keith Murray Consultants (same as objection from the doctors, see below)	1.	The Scheme does not contribute to the social well-being of the land required under the Order.	<p>The Council does not agree with the objector's assertion for the reasons set out in section 9 of this Statement.</p> <p>The Council remains confident that the Scheme will enable the delivery of comprehensive residential-led mixed use development which will make an important contribution to the housing needs of the local area as well as providing a safer and more welcoming neighbourhood. The Scheme will further improve the economic, environmental and social well-being of the area offering benefits to existing and new residents and businesses of the area.</p>
		2.	There is a strong community of owners and tenants, who have operated from the area for a number of years, that would be broken up by the scheme.	The objector is understood to be an investment owner and is not currently in occupation of the property. The existing business which operates from the property is understood to be owned and run by a separate entity who did not object to
		3.	The local traders contribute to the local community and economy which cannot be replicated anywhere else.	

	Party		Objection	Response
		4.	There are several generations of the same family and friends trading within the area that stretch across the entire proposed development area.	<p>the Order. As such, the objector is not considered to be a local trader.</p> <p>Notwithstanding the above, and as set out more fully at Section 12.2.9 of this Statement, the Scheme has been designed to offer modern accommodation suitable for a range of retailers and commercial occupiers.</p> <p>Lendlease is committed to prioritising the relocation of existing businesses within the Scheme or, if that is not feasible, within the vicinity of the Scheme. Those commitments are encapsulated within the section 106 Agreement and reflect the long standing commitments identified by the Council within the Business Charter.</p> <p>Lendlease has recently written to all of the businesses on the High Road setting out the various relocation options available and seeking further information regarding the businesses with a view to understanding the specific business needs of each.</p>
		5.	Public consultation been far from sufficient and has involved a long list of pledges which have not been kept or are no longer relevant.	<p>The Council and Lendlease do not agree that the public consultation regarding the Scheme has been deficient.</p> <p>The proposals to deliver the Scheme and the wider Redevelopment Scheme have been developed through extensive public consultation and engagement with the residents, businesses and wider community since 2012.</p> <p>For business and property owners specifically, there has been a series of dedicated events including drop-in sessions and 'business breakfasts' to provide updates on the Scheme and to discuss the support available for each business.</p> <p>As set out in section 2 of this Statement, this included consultation on the development of masterplan options and the HRWMF in 2013 and 2014 respectively. Further rounds of public consultation took place in 2021 to inform the planning application prior to its submission.</p>

	Party		Objection	Response
				<p>The proposals have been taken forward by submission of the planning application in 2021 and grant of the Planning Permission in 2022. Throughout that period there was extensive public consultation and engagement. A summary of the public consultation undertaken since 2012 is set out within the Statement of Community Involvement submitted by Lendlease alongside the application for the Planning Permission and in the Planning Officer's Report on that application.</p> <p>The objector and the wider public have been provided with numerous opportunities to comment on the evolution of the Scheme since its inception in 2012. The Scheme (and the wider Regeneration Scheme) has been significantly informed by the numerous consultations undertaken since 2012.</p> <p>More recently, the Council and Lendlease held drop-in sessions specifically for people directly affected by the Order on 9 February 2023 and 21 February 2023.</p> <p>The commitments to business / property owners throughout, contained within the Business Charter, have been consistent and communicated to these individuals through ongoing correspondence.</p>
		6.	<p>The 2014 consultation was flawed and badly administered. Only 40% of householders on Love Lane were consulted and 70 replies from local businesses were not included in the consultation report and only featured as an appendix. This means that locals were not able to put forward their views.</p> <p>The scheme does not reflect the views expressed by the residents who supported the retention of existing businesses.</p>	<p>The 2014 consultation was extensive and sought the views of a wide range of local stakeholders including businesses. Consultation packs were sent to approximately 4,000 households/businesses across the consultation area, which extended 300m from the Regeneration Scheme boundary. Various methods were used to publicise the consultation including a website, newsletter, meetings, door knocking and home visits.</p> <p>Two dedicated business drop-in sessions were held during this consultation exercise, as well as one-to-one meetings with various businesses potentially affected by the plans. 16 feedback forms and 4 written responses were received from</p>

	Party		Objection	Response
			<p>The 2014 consultation was based on a substantially different scheme, the scheme is out of date and based upon assurances that are no longer on offer or relevant</p>	<p>the potentially 96 businesses affected (noting that one of the responses represented 21 of the 35 units on the Peacock Industrial Estate). These responses were included within the consultation report and considered by Cabinet when making the decision to approve the HRWMF.</p> <p>The HRWMF heavily influenced the development permitted pursuant to the Planning Permission. As set out within the Planning Committee Report, when taken as a whole, the Planning Permission conforms with the key principles set out in the HRWMF, including a significant uplift in new homes (including affordable homes), significant public realm improvements, new pedestrian and cycle links and new community facilities.</p> <p>The objector has queried the statistics provided in the committee report for the 2014 consultation. The Council does not recognise the figure of 40% in relation to the householders on the Love Lane Estate that were consulted. The report to Cabinet notes that all leaseholders on the estate were consulted, and of the 60% who responded to the consultation, 68% supported the inclusion of the whole of the Love Lane Estate in the regeneration proposals. This is correct and related specifically to the demolition of the Love Lane Estate. This support for the Scheme by Love Lane residents has subsequently been re-affirmed through the resident ballot in 2021.</p> <p>The report does not state that the 68% figure was in relation to feedback from businesses and the wider community. Notwithstanding that, as set out above. There was extensive consultation undertaken with residents and businesses in the wider area in 2014 and this feedback was taken into account in the consultation report.</p>
		7.	The 2021 GLA ballot process was unsatisfactory and rushed.	The resident ballot on the Love Lane Estate, which took place in August and September 2021, was undertaken in line with

	Party		Objection	Response
				the GLA's Capital Funding Guide. The ballot was administered by an independent body, Civica Election Services (CES), who confirmed that they were satisfied that the ballot process was conducted in accordance with GLA regulations.
		8.	All of the High Road commercial properties are part of the Tottenham community and should be retained.	As set out within Section 10 of this Statement, the existing properties along the High Road are required in order to deliver on the requirements of the planning framework, specifically Site Allocation NT5 within the TAAP, and facilitate the delivery of the substantial public benefits of the Scheme.
		9.	The Scheme could have avoided demolition of the High Road commercial properties.	
		10.	Businesses and tenants have been excluded from the Scheme and discriminated against.	
Obj 3	Alecos, Kate, Kyriacos and Maria Tryfonos Tryfonos Bros. Limited C/o Town Legal LLP	1.	The flexibility of the planning permission in relation to Plot E and Moselle Square is not appropriate in the context of a CPO. It is not enough to demonstrate that the Scheme as a whole meets those tests (i.e. that the public benefits of the Schedule as a whole outweigh the interference with human rights of those affected). It must show that each part of the Order Land is required to deliver the public benefits of the Scheme.	As set out within Section 10 of this Statement, the existing properties along the High Road are required in order to deliver on the requirements of the planning framework, specifically Site Allocation NT5 within the TAAP, and facilitate the delivery of the substantial public benefits of the Scheme.
		2.	The Statement of Reasons makes no reference to the benefits from the development of Plot E and is vague as to the benefits that Moselle Square will bring.	Notwithstanding the response at Section 12 of this Statement, which sets out the requirement for the existing High Road properties, Plot E and Moselle Square will deliver a number of benefits, which are set out below. Pursuant to the Planning Permission, Plot E is capable of providing up to 5,500 sqm GEA of community, leisure, retail and Sui Generis (including cinema and public house) floorspace, with a minimum of 1,000 sqm GEA to be provided as commercial, retail, leisure and medical uses (Use Class E (a-e)).

	Party		Objection	Response
				<p>As well as Plot E delivering a key placemaking role and facilitating the delivery of a new east to west route through the Scheme, the provision of the above uses will provide significant economic and social benefits to the area, including employment and learning opportunities.</p> <p>Furthermore, Plot E is the proposed location of the new Library and Learning Centre as indicated within the Illustrative Masterplan. The provision of the Library and Learning Centre is a key requirement of the Development Plan and will deliver substantial social and economic benefits to the area.</p> <p>Moselle Square will be a new public square of a minimum of 3,500 sqm. As well as fulfilling the clear requirements of the adopted planning framework, Moselle Square will provide significant new open space for the local community in an area that has been identified as being deficient in open space. It will provide a range of benefits for the community, including leisure and social spaces and capacity for events, markets and other activities, as well as accommodating the movement of THFC Stadium visitors and for views to and from THFC Stadium and the Station.</p>
		3.	The Statement of Reasons does not explain why powers are required in 2023/24 for a sub-phase which will not commence until at least 4 years later. This timeframe is also indicative and optimistic.	Lendlease's commitment to the delivery of the Scheme and the provision of new Council homes is evidenced via its decision to implement the Planning Permission and commence works on Plot A prior to the Order being confirmed. It is also noted that the Council has made the CPO only in relation to Phase A, and has therefore already taken a view on which land it is appropriate to seek compulsory purchase powers in relation to at this stage. Further information on phasing is set out at Section 7.
		4.	The Tryfonos properties are to be acquired nearly 2 years before required. It is not acceptable to seek compulsory purchase powers so far in advance of when needed.	
		5.	The Council should remove the Tryfonos properties from the Order and, if appropriate, make a further Order when it can set out what development that land	

	Party		Objection	Response
			is needed for and demonstrate a compelling case in the public interest.	<p>In the event the Order is confirmed the powers to acquire the existing interests within the Order Land will be available.</p> <p>However, the powers are not required to be used immediately.</p> <p>As set out within Section 12.2.6 of this Statement, with a view to providing certainty and clarity to those impacted by the delivery of the Scheme, including the objector, the Council and Lendlease have confirmed that they do not intend to rely on the Order to obtain vacant possession of:</p> <p>a) 731 – 741 High Road (Plots 44-51), in advance Q1 2025; and</p> <p>b) 743-759 High Road (Plots 69-84), in advance of Q2 2026.</p>
		6.	<p>The Statement of Reasons does not comply with the 2019 Guidance.</p> <p>Section 7 of the Statement of Reasons purports to set out how the Scheme will be delivered and funded but fails.</p> <p>The Statement of Reasons does not contend that the scheme is independently financially viable.</p>	<p>Section 7 of this Statement sets out how the Scheme will be funded and delivered.</p> <p>The objector has referenced the viability information submitted as part of the planning application for the Planning Permission to argue that the Scheme is unviable. It is noted that the viability appraisal agreed between the Council and Lendlease's viability consultants showed that the development consented by the Planning Permission was viable with an IRR of 11.62%.</p> <p>For the reasons given in section 7 of this Statement of Case, the Council and Lendlease are satisfied that the Scheme is likely to be delivered and will demonstrate the same in evidence at the CPO Inquiry.</p>
		7. 8.	The Statement of Reasons does not say that the grant funding is unconditional or if it relates to specific phases of the Scheme.	Grant funding for the scheme has been secured from the GLA via the Mayors Land Fund and Affordable Housing Grant. Pursuant to the terms of the respective agreements, funds are released to the Council in tranches. The first tranches of both grant funding have been drawn down. The remaining tranches will be drawn down in accordance with the terms of the respective agreements.

	Party		Objection	Response
		9.	The Statement of Reasons sets out the assets and funds of Lendlease Corporation Limited. However, the Development Agreement and CPO Indemnity Agreement are with a subsidiary company. No reference has been made in the Statement of Reasons to a parent company guarantee and there is no evidence that the subsidiary has sufficient funds.	<p>As set out more fully in Section 7 of this Statement, the Development Agreement and CPO Indemnity Agreement were entered into by Lendlease as well as Lendlease Corporation Limited ("Lendlease Ltd").</p> <p>Lendlease Ltd entered into the Development Agreement and CPO Indemnity Agreement as a guarantor. In its capacity as guarantor Lendlease Ltd has covenanted to deliver the Scheme on the same terms as Lendlease.</p> <p>Since entering into the Development Agreement, Lendlease Ltd has provided funding to Lendlease in order to progress the delivery of the Scheme and the Regeneration Scheme, including securing Planning Permission for the Scheme.</p> <p>Section 7 of this Statement sets out fully how the Scheme will be funded which includes a combination of grant funding (£91.5m of which was secured in December 2021), internal funding (from Lendlease's parent companies (which includes Lendlease Ltd)) and third-party capital.</p>
		10.	The Statement of Reasons states that the Council is satisfied that Lendlease has the necessary funds. It is for the confirming authority to be satisfied, not the Council.	Please refer to Section 7 of this Statement in addition to the response to point 9 above.
		11.	It is clear from paragraph 7.16 of the Statement of Reasons that funding is not yet in place and Lendlease and its parent company have not contractually committed their own funds.	Please refer to Section 7 of this Statement in addition to the response to point 9 above.
		12.	The Statement of Reasons is silent as to conditions to be met for the delivery of sub-phases 2 and 3. In the absence of this, it must be assumed that conditions for delivery of these phases have not been met.	Section 7 of this Statement identifies the various conditions required to be satisfied in advance of the Council granting a lease of a phase of the Scheme to Lendlease.

	Party		Objection	Response
				<p>The conditions relevant to the phases of the Scheme the objector's properties are located within have yet to be satisfied.</p> <p>One of the conditions is that vacant possession of the relevant phase has been secured. The Council has made the Order with a view to obtaining vacant possession thereby facilitating the delivery of the Scheme in accordance with the terms of the DA.</p>
		13.	<p>The Council does not assert they and Lendlease have taken reasonable steps to acquire interests in the land or have in fact acquired by agreement.</p>	<p>A summary of the Council and Lendlease's efforts to acquire interests in the Order Land is set out at Section 10 of this Statement.</p> <p>The Council and Lendlease have taken reasonable steps to acquire interests in the whole of the Order Land. These steps have resulted in a large number of acquisitions by agreement, both within the Love Land Estate and along the High Road.</p> <p>In respect of the High Road, the Council has to date acquired the freehold of 743 High Road (Plots 69 – 71 of the Order Schedule), 753 High Road (Plots 79 and 80) and 731 High Road (Plot 44).</p> <p>The Council and Lendlease will continue to undertake reasonable steps to acquire the remaining interests within the Order Land in parallel to the Order, as anticipated within the 2019 Guidance.</p>
		14.	<p>Paragraph 11.36 [of the Statement of Reasons] states that the Tryfonos family "<i>have been a long-time objector to the Scheme</i>". The Tryfonos family do not object to the Scheme generally, but instead object to the inclusion of the Tryfonos properties and failure to properly engage.</p>	<p>For the reasons set out within Section 10 of this Statement, the existing properties along the High Road (including the objector's properties) are required in order to deliver on the requirements of the planning framework, specifically Site Allocation NT5 within the TAAP, and facilitate the delivery of the substantial public benefits of the Scheme.</p> <p>Excluding the High Road properties from the Scheme would result in the Scheme failing to deliver on the key requirements of the adopted planning framework, including the delivery of</p>

	Party		Objection	Response
				<p>Moselle Square and the delivery of an east-west connection between the Station and the THFC Stadium.</p> <p>The Council and Lendlease strongly refute the objector's claim that the Council and Lendlease have failed to engage.</p> <p>The objector was unwilling to engage in meaningful discussions regarding the Scheme prior to the outcome of the Love Lane Estate residents' ballot in 2021.</p> <p>Following the outcome of the ballot, the objector was a vocal objector to the application for the Planning Permission. This objection has been sustained since the grant of the Planning Permission.</p> <p>Notwithstanding the above, and as set out more fully within Section 12 of this Statement, the Council and Lendlease have and will continue to engage with the objector in respect of the acquisition of the objector's properties, including the relocation of the objector's existing businesses.</p>
		15.	Only two of the engagements referred to in the Statement of Reasons involved negotiations regarding the objector's properties.	<p>Whilst the primary purpose of the meeting on 23 November 2022 was to measure the Chick King premises and associated flat in order to inform the offer sent in early January, at that meeting discussions were had with Alecos Tryfonos regarding the value of the objector's properties.</p> <p>As such, the Council considers that there have been three formal engagements regarding the acquisition of the objector's property and that these are in addition to the less formal ongoing dialogue between the objector and CBRE regarding the acquisition of the objector's property.</p>
		16.	The discussions to date have lacked sufficient detail to constitute a relocation offer.	<p>The meeting held on 28 June 2022 was attended by Alecos Tryfonos as well as CBRE and a representative of Lendlease's retail team.</p> <p>During the meeting, CBRE and Lendlease sought to further understand the objector's business requirements.</p>

	Party		Objection	Response
				<p>As part of those discussions, the location of alternative premises was discussed and whether it would be possible for the objector's Chick King business to relocate within the Scheme.</p> <p>Details regarding vehicular access, lease duration, service charges and rents were also discussed. Following the meeting on 28 June, an offer was made for the acquisition of the objector's properties. The offer included two options, one of which would have enabled the objector to continue trading until vacant possession of the objector's properties was required, thereby enabling further time for discussions regarding the relocation of the objector's existing businesses (both Chick King and K&M) within the Scheme.</p>
		17.	Discussions have entirely revolved around the relocation of Chick King until the most recent meeting. There has been no discussion regarding relocation of K&M Store Household Goods.	<p>It is correct that the meeting on 28 June 2022 concerned the relocation of the objector's Chick King business.</p> <p>However, prior to that meeting the objector had not stated that Kate Tryfonos (the owner of the K&M business) was also considering relocating within the Scheme.</p> <p>Following confirmation of the same, the offer to acquire the objector's properties dated 13 January 2023 referred to the possible relocation of both businesses within the Scheme.</p>
		18.	The Council has failed to produce a relocation strategy for businesses affected by the Order. The Statement of Reasons refers to the Council's Business Charter which is a draft from 2014.	<p>The Business Charter sets out principles that must be adhered to in the relocation of businesses as part of the Scheme. Whilst the Business Charter is stated as being in draft form, the Council and Lendlease are committed to the principles within it.</p> <p>This commitment is secured by clause 4.4.2 of the CPO Indemnity Agreement which places the Council and Lendlease under an obligation to carry out negotiations to acquire the existing High Road properties in accordance with the Business Charter.</p>

	Party		Objection	Response
				<p>As set out further in Section 12.2.11 of this Statement, the commitments set out within the Business Charter have recently been encapsulated within the section 106 Agreement which requires Lendlease to submit a Business Relocation Strategy to the Council for approval.</p> <p>Although vacant possession of the High Road properties is not required until Q1 2025 at the earliest, Lendlease has continued to engage with the existing businesses, and specifically recently regarding the options for relocating both within and outside of the Scheme with a view to providing businesses with as much support and information as possible.</p> <p>This is evidenced via the recent Business Support Leaflet that was sent to all the businesses along the High Road. The Council and Lendlease recognise that the existing businesses located on the High Road (including those operated by the objector) have individual needs. As such, the relocation strategy may need to be tailored to individual business circumstances.</p> <p>The Business Support Leaflet as well as the previous and on-going offers to meet with business owners forms part of the process of understanding individual business owners' needs with a view to facilitating relocation where that is the desired outcome.</p>
		19.	The Council's Business Charter commits to providing a dedicated officer to each business and household. An officer has not been provided for the Tryfonos Properties.	<p>A dedicated officer has been in place within the Council's High Road West Team throughout the development and delivery of the Scheme. That officer has undertaken to meet business on a one-to-one basis, deliver business events, provide information such as newsletters and flyers and provide advice regarding the Scheme.</p> <p>The Council and Lendlease have written to the owners of all of the businesses located along the High Road (including the</p>

	Party		Objection	Response
				<p>objector) confirming that the dedicated officer is Scott Mundy, Regeneration Manager.</p> <p>Lendlease have and will continue to provide dedicated resource, including relocation and wider business support, tailored to the needs of businesses as these requirements are confirmed through dialogue with each business owner and as the delivery of the Scheme progresses.</p>
		20.	<p>Statement of Reasons sets out the offers that have been made to resident leaseholders. It is unclear why a similar offer has not been made to resident freeholders of Tryfonos properties and why Council tenants are treated better than resident freeholder owner-occupiers.</p>	<p>The Love Lane Leaseholder Offer was developed to provide a rehousing offer for those resident leaseholders who live on the Council-owned Love Lane Estate including those that had purchased their homes through the Right to Buy scheme. The Council has a direct responsibility for its residents on its estates, including its tenants, leaseholders and freeholders. The Leaseholder Offer was developed in the context of the Estate Renewal Rehousing and Payments Policy (ERRPP) 2017 which sets out the baseline offer for its residents who are required to move due to an estate renewal scheme. As such the policy does not apply to resident freeholders or leaseholders outside of the Council's estates.</p> <p>As referred to at Section 12.1.49-12.58 of this Statement, Lendlease and the Council are continuing to engage with the Tryfonos family regarding the acquisition of their interests in the Order Land which includes the residential premises on the High Road.</p> <p>In relation to paragraph 37 of the objection, the Leaseholder Offer is a separate document to the Landlord Offer, although the commitments within it were captured within the Landlord Offer, which was the subject of the resident ballot.</p>
		21.	<p>The Tryfonos family have not been invited to any residents' meetings.</p>	<p>The Council and Lendlease have worked to engage with the Tryfonos family regarding their properties which has included discussions regarding the residential properties.</p>

	Party		Objection	Response
				<p>The Council has held a series of dedicated engagement events with residents on the Love Lane Estate, including meetings with the Love Lane Residents Association. The properties on the High Road are not included within the Love Lane Estate and therefore such residents have generally not been included in the distribution for these meetings.</p> <p>In any event, the Council and Lendlease have continuously engaged residents both within and outside the Order Land through the formation of the Scheme. This has included correspondence relating to the planning consultation process in 2021, including invitations to drop-in sessions.</p>
		22.	A meaningful voice on the proposed redevelopment has not been offered to the Tryfonos family. The Council has not considered any alternative that does not require the acquisition and demolition of the Tryfonos properties.	<p>Please see the response provided above to point 5 of the objection received from Mr Ahmet Huseyin Dellal in relation to the consultation process undertaken in respect of the Scheme.</p> <p>In respect of alternatives, the requirement for the acquisition and demolition of the objectors' interests within the Order Land is set out fully within section 9 of this Statement.</p>
		23.	A compelling case in the public interest has not been established. The Council has not demonstrated that there are no material impediments to the Scheme coming forward and compulsory purchase is not a last resort.	The Council strongly considers that a compelling case in the public interest has been made out, and specifically that it is established in relation to the High Road properties. It is necessary and justified for the Order to be confirmed, in order to ensure delivery of the Scheme and the associated substantial public benefits.
Obj 4	Kingwell Investments Limited	1.	The objector's property is to be acquired two years before it is required. There are no compelling reasons to justify such an early acquisition.	Please see the response provided above to points 3, 4 and 5 of the objection received from on behalf of Alecos, Kate, Kyriacos and Maria Tryfonos and Tryfonos Bros Ltd.
	Dr and Mrs R Jeyarajah – sole directors	2.	Published documents to support the Order show that the Council has no clear idea what the objector's property is to be put to. This vagueness is replicated in the officer's report.	As set out within Section 10 of this Statement, the existing High Road properties are required in order to deliver on the requirements of the adopted planning framework, specifically

	Party		Objection	Response
	of the company C/o Keith Murray, Keith Murray Consultants			<p>Site Allocation NT5 within the TAAP, and facilitate the delivery of the substantial public benefits of the Scheme.</p> <p>Notwithstanding the above, the Planning Permission grants consent for the construction of Plot E on the objector's property.</p> <p>Pursuant to the Planning Permission, Plot E is capable of providing up to 5,500 sqm GEA of community, leisure, retail and Sui Generis (including cinema and public house) floorspace. Also, a minimum of 1,000 sqm GEA is to be provided as commercial, retail, leisure and medical uses (Use Class E (a-e)).</p> <p>Furthermore, Plot E is the proposed location of the new Library and Learning Centre as indicated within the Illustrative Masterplan. The provision of the Library and Learning Centre is a key requirement of the Development Plan and will deliver substantial social and economic benefits to the area.</p>
		3.	The objector's property should be removed from the Order. If the Council concludes that it requires the property, it can make a further CPO to redevelop the immediate area within a reasonable timeframe.	Please see the response provided to point 1 of this objection.
		4.	The Council is required to address both the source of funding for the proposed development and when that funding will be available.	Please see the response provided above to points 6 and 9 of the Tryfonos Bros Limited objection.
		5.	The Statement of Reasons does not contend that the proposed development is independently financially viable.	Please see the response provided above to point 6 of the Tryfonos Bros Limited objection.
		6.	The Statement of Reasons does not say that the grant funding is unconditional or if it relates to any specific phases.	Please see the response provided above to point 8 of the Tryfonos Bros Limited objection.

	Party		Objection	Response
		7.	The Statement of Reasons addresses the assets of Lendlease Corporation Limited, however the Development Agreement and CPO Indemnity Agreement is with another entity (Lendlease (High Road West) Ltd) which in June 2021 had negative equity of £1.95m.	Please see the response provided above to point 9 of the Tryfonos Bros Limited objection.
		8.	Lendlease is not contractually committed to deliver the proposed development.	Lendlease and Lendlease Corporation Limited are contractually committed to deliver the Scheme pursuant to the terms of the Development Agreement and CPO Indemnity Agreement.
		9.	There can be no guarantee that the Scheme will go ahead.	<p>The Council is confident that the Scheme will be delivered subject to vacant possession of the Order Land being secured.</p> <p>As set out within this Statement:</p> <p>a) Lendlease and Lendlease Corporation Limited are contractually committed to deliver the Scheme pursuant to the terms of the Development Agreement and CPO Indemnity Agreement;</p> <p>b) Planning Permission for the Scheme has been obtained;</p> <p>c) Lendlease has, to date, incurred substantial costs in relation to the delivery of the Scheme and the Regeneration Scheme, including the costs incurred in securing the Planning Permission, which evidence its continuing commitment to the Scheme;</p> <p>d) Lendlease has commenced works on Plot A in advance of the Order being confirmed; and</p> <p>e) the Council secured £91.5m of grant funding in December 2021 towards the delivery of the Scheme.</p>
		10.	The Council has not demonstrated a compelling case in the public interest for the inclusion of the Kingwell	For the reasons set out above and in this Statement, the Council disagrees and considers that there is a compelling

	Party		Objection	Response
			property and has not demonstrated why it was included when it was not required until end of 2028. If confirmed, the Order should exclude the block which the objector's property forms part of.	case in the public interest to justify the use of compulsory purchase powers to deliver the Scheme and which requires certainty of achieving vacant possession of the objector's property.
Obj 5	Network Rail Infrastructure Limited	1.	The grant of rights sought would fetter the land and prevent it from being used safely as operational railway.	Lendlease is in discussions with Network Rail with a view to concluding an agreement which will enable the Scheme to be implemented and yet secure the necessary protections for any operational property. Lendlease is confident that such an agreement can be concluded before confirmation of the Order such that the objection can be removed. Network Rail were informed about the requirement for rights east of the railway line during meetings with Lendlease in July and December 2022. The rights sought to the east of the railway will be exercised in a manner consistent with the proximity of the plots to the railway.
		2.	The access rights sought are extensive and in close proximity to the railway.	
		3.	Network Rail is reviewing the rights sought but has material concerns about maintaining operational access to the railway if the rights were granted.	
		4.	An asset protection agreement is needed to control the rights and protect the railway.	
		5.	Network Rail was only informed about the requirement for property rights on the east of the railway in January 2023.	
		6.	No material discussions about asset protection arrangements or acquisition of rights for east of the railway have taken place to date (it is noted that discussions in relation to land west of the railway are ongoing).	
		7.	The extent of the property requirements was unclear until the Order was made.	
		8.	No attempt was made to negotiate the rights before the Order was made. The developer has not been proactive since the Order was made. The lack of	

	Party		Objection	Response
			engagement means that the Order has not been made as a last resort.	
		9.	The rights set out in the Order are to facilitate carrying out of development and should be temporary. The use of the order to obtain permanent rights is disproportionate and inappropriate.	It is not possible for the Council to acquire temporary rights. In any event, it is the intention that (other than the Right of Access sought over Plot 58) the rights are only exercised during the construction phase of the relevant part of the Scheme.
Obj 6	Rail for London	1.	The grant of rights sought would fetter the land and prevent it from being used safely as operational railway.	Lendlease is in discussions with Rail for London with a view to concluding an agreement which will enable the Scheme to be implemented and yet secure the necessary protections for any operational property. Lendlease is confident that such an agreement can be concluded before confirmation of the Order such that the objection can be removed. The rights sought to the east of the railway will be exercised in a manner consistent with the proximity of the plots to the railway.
		2.	The access rights sought are extensive and in close proximity to the railway.	
		3.	Rail for London is reviewing the rights sought but has material concerns about maintaining operational access to the railway if the rights were granted.	
		4.	An asset protection agreement is needed to control the rights and protect the railway.	
		5.	Rail for London was only informed about the requirement for property rights on the east of the railway in January 2023.	
		6.	No material discussions about asset protection arrangements or acquisition of rights for east of the railway have taken place to date (it is noted that discussions in relation to land west of the railway are ongoing).	
		7.	The extent of the property requirements was unclear until the Order was made.	

	Party		Objection	Response
		8.	No attempt was made to negotiate the rights before the Order was made. The developer has not been proactive since the Order was made. The lack of engagement means that the Order has not been made as a last resort.	
		9.	The rights set out in the Order are to facilitate carrying out of development and should be temporary. The use of the order to obtain permanent rights is disproportionate and inappropriate.	It is not possible for the Council to acquire temporary rights. In any event, it is the intention that (other than the Right of Access sought over Plot 58) the rights will only be exercised during the construction phase of the relevant part of the Scheme.
Obj 7	Tottenham Hotspur Foundation	1.	The Foundation objects to its rights being reduced or compromised in any manner.	<p>It is not possible at this time to confirm which properties within the vicinity of the Scheme will be impacted in respect of right to light.</p> <p>When making the Order, the Council took a conservative approach and included properties which could potentially have a right to light impacted in the future, including the objector's property.</p> <p>However, the inclusion of the objector's property within the Order does not confirm that the property currently benefits from a right of light, simply that if it does, such right has the potential to be impacted.</p> <p>Lendlease has written to the objector seeking further details regarding any right of light benefiting the property.</p>
		2.	One of the Foundation's aims is to generate employment in what is a deprived area. The Scheme underlying the Order fails to do so.	For the reasons given at Section 9 of this Statement, the Council is of the view that the Scheme will generate substantial employment opportunities for the area.
		3.	The Foundation believes there are better alternatives for the redevelopment and regeneration of the area.	<p>The objector has failed to identify any better alternative for the redevelopment and regeneration of the area.</p> <p>However, the Council notes that the objector does not appear to be objecting to the principle of the Scheme or the</p>

	Party		Objection	Response
				requirement for the Order Land to be acquired in order to facilitate its delivery.
		4.	The Foundation does not consider there is a compelling case in the public interest to justify the use of compulsory purchase powers.	For the reasons set out in this Statement, the Council disagrees and considers that there is a compelling case in the public interest to justify the use of compulsory purchase powers.
Obj 8	Canvax Limited Goodsyard Tottenham Limited Meldene Limited Tottenham Hotspur Stadium Limited Paxton17 Limited Stardare Limited High Road West (Tottenham) Limited	1.	Sections 2 and 3 of the Statement of Reasons are partial and deeply misleading in a number of material aspects.	The Council does not agree that Sections 2 and 3 of this Statement are partial or misleading. The Council has summarised THFC's involvement in the origins of the Regeneration Scheme, which has continued as the plans have progressed, within Section 3 of this Statement. This includes recording THFC's response to the consultation exercises in 2013 and 2014 and their role in the Council's procurement process of a development partner in 2017. As set out more fully within the Statement of Community Involvement submitted by Lendlease alongside the application for the Planning Permission, a number of consultation events were held in advance of the planning application being submitted. THFC was invited to all such consultations. In addition to this Lendlease has been engaging, and continues to seek engagement, with THFC on a one to one basis. In particular with reference to consultation on the planning application, this ongoing engagement included various discussions between THFC and Lendlease from 2020 and 2021, on the emerging proposals for the illustrative masterplan and vision of the Regeneration Scheme.
		2.	The Statement of Reasons fails to record THFC's involvement in the origins of the development of the High Road West concept.	
		3.	The Statement of Reasons misleadingly implies that THFC was fully consulted in the development of the planning application.	
		4.	There was no meaningful consultation or engagement with THFC on the design or composition of the Scheme nor impacts of the Scheme on the stadium prior to making the planning application.	
		5.	There has been limited attempts to acquire objector's land.	
				As set out more fully within Sections 3.35—3.43 of this Statement, Lendlease has made numerous attempts to engage with the objector regarding the acquisition of its interests within the Order Land. This includes the submission

	Party		Objection	Response
				<p>of a written offer to acquire the objector's interests within the Order Land.</p> <p>However, the objector has confirmed in writing that it would be premature to discuss the details of any acquisition unless and until the form of the development permitted pursuant to the Planning Permission is amended to respond to its objections.</p> <p>Notwithstanding the above, the Council and Lendlease have confirmed that they remain willing and ready to enter into negotiations with the objector.</p>
		6.	The purpose for which the land is proposed to be acquired is inconsistent with the Local Plan for the area.	<p>The Scheme comprises the first phase of the comprehensive residential-led mixed use regeneration of the High Road West area.</p> <p>For the reasons set out more fully in Section 6 of this Statement, the Council is satisfied that both the principle of the Scheme and the Scheme as permitted by the Planning Permission are generally consistent with the adopted planning framework, specifically the TAAP.</p> <p>The Scheme forms part of Site Allocation NT5 within the TAAP.</p> <p>The Site Allocation states the following proposals for High Road West:</p> <p><i>"Master planned, comprehensive development creating a new residential neighbourhood and a new leisure destination for London. The residential-led mixed-use development will include a new high quality public square and an expanded local shopping centre, as well as an uplift in the amount and quality of open space and improved community infrastructure."</i></p> <p>A key tenet of the Site Allocation seeks the creation of a new residential neighbourhood through increased housing choice and supply, with a minimum 1,400 new homes of a mix of</p>

	Party		Objection	Response
				<p>tenure, type and unit size (including the re-provision of existing social rented Council homes, the offer of alternative accommodation for secure tenants, and assistance in remaining within the area for resident leaseholders from the Love Lane Estate).</p> <p>The Site Allocation also seeks increased and enhanced community facilities and social infrastructure, including a new library and learning centre alongside the provision of a new and enhanced public open space, including a high-quality public square.</p> <p>It is therefore clear that the principle of the Scheme is fully consistent with the adopted planning framework.</p> <p>The objector suggests that the Planning Permission fails to accord with the adopted planning framework by reason of it failing to deliver a "<i>new leisure destination</i>".</p> <p>Policy DM55 of the Development Management DPD states that where development comes forward as part of an allocated site, the Council will require a masterplan to be prepared and accompanied by the proposal.</p> <p>Furthermore, and as noted above, Site Allocation NT5 seeks the "<i>masterplanned</i>" and "<i>comprehensive development</i>" of the Site Allocation. It also requires the site to "<i>be brought forward in a comprehensive manner to best optimise the regeneration opportunity</i>".</p> <p>The planning application for the Planning Permission was consequently determined by the Council in the context of its ability to bring forward development in a comprehensive manner and in compliance with the site allocation.</p> <p>When considering the planning application for the Planning Permission, the Council concluded that, when taken as a whole, the proposals deliver significant social and economic benefits and deliver on the vision set out within the TAAP,</p>

	Party		Objection	Response
				<p>such that they confirm with the key principles set out within the HRWMF.</p> <p>Notwithstanding the above, the Council and Lendlease consider that the Planning Permission does contain provision for significant leisure floorspace, including 3,500 sqm of new public open space in the form of Moselle Square which will be capable of hosting events, markets and other leisure activities.</p>
		7.	<p>The purported economic, social and environmental benefits are overstated and there is a real prospect that many will not actually be delivered.</p> <p>The Planning Permission includes an unusually large degree of flexibility regarding scale and uses. The harms and benefits are very difficult to assess. Reliance should only be placed on the minimum amounts approved. A number of uses could be omitted and so these cannot be given weight.</p> <p>The Planning Permission does not assure delivery of important social infrastructure on which the Order has been justified in the Statement of Reasons, including the Library and Learning Centre and Moselle Square.</p>	<p>The Scheme is for the comprehensive residential-led mixed use regeneration of the Order Land.</p> <p>The Council is of the view that the Scheme will make a significant contribution to tackling the economic, social and environmental issues facing the local residents.</p> <p>The delivery of new homes, including affordable housing, will provide an important contribution to the borough's housing targets in an area with substantial housing waiting lists and overcrowding.</p> <p>By reason of the terms of the Landlord Offer and Local Lettings Policy, existing secure and non-secure tenants will be offered new social rented homes within the Scheme, supporting the retention of existing family, community and social ties.</p> <p>The Scheme will improve connectivity and safety and the new public realm will provide enhanced amenity space.</p> <p>The non-residential floorspace will provide employment opportunities for the local community as well as facilitating the enhancement of the local town centre and local retail offer.</p> <p>The Planning Permission provides flexibility as to the quantum of uses provided which is typical of large scale schemes of this nature, to ensure flexibility during delivery of the Scheme so that it can respond to changing demands.</p>

	Party		Objection	Response
				<p>Notwithstanding this, and contrary to what is stated within the objection, the Planning Permission and section 106 Agreement:</p> <p>a) provide for a minimum of 1,350 new homes (500 of which will be new social rented homes);</p> <p>b) require the delivery of Moselle Square (being a minimum of 3,500 sqm of open space) (see Schedule 13 of the section 106 Agreement);</p> <p>c) require the provision of a Library and Learning Centre within the Scheme (see Schedule 14 of the section 106 Agreement); and</p> <p>d) require the provision of a new Health Centre in the event a replacement one is not provided in advance of the existing one being demolished.</p> <p>In addition to this, the Library and Learning Centre, as well as other social infrastructure represents a Core Requirement of the Development Agreement between the Council and Lendlease.</p>
		8.	The Planning Permission underlying the CPO scheme is currently subject to challenge pursuant to a claim for judicial review and, if successful, the absence of planning permission represents an impediment to delivery.	<p>Permission to apply for judicial review has been refused on the papers and at a subsequent oral hearing. The objector has appealed to the Court of Appeal.</p> <p>The Council and Lendlease will continue to resist the claim for judicial review. Unless and until the Planning Permission is quashed, it remains a valid and lawful permission capable of being relied upon.</p> <p>If the Planning Permission were quashed, there are no obvious reasons why a further planning permission for the Scheme would not be granted in the context of the adopted planning framework.</p>

	Party		Objection	Response
		9.	<p>There is no evidence that the CPO scheme is viable and there is a real risk that it will not be delivered.</p> <p>The Financial Viability Assessments submitted in support of the Planning Permission concluded that the whole scheme was not viable.</p>	<p>The Financial Viability Assessments submitted as part of the planning application for the Planning Permission and agreed between the Council and Lendlease's consultants showed that the development consented by the Planning Permission was viable, with an IRR of 11.62%.</p> <p>The Council and Lendlease are satisfied that the Scheme is likely to be delivered and will demonstrate the same at the CPO Inquiry.</p>
		10.	<p>The CPO scheme will give rise to unacceptable safety impacts to visitors attending the Tottenham Hotspur Stadium.</p> <p>The objector made objections to the planning application in respect of the impact of the Scheme on the management of crowd flows to and from the Tottenham Hotspur Stadium. These objections remain directly relevant to the consideration of the Order.</p> <p>The mechanisms with the High Road West Planning Permission and associated section 106 Agreement that purport to provide for the provision of alternative access to THFC for the management of crowd flows are wholly inadequate.</p>	<p>The impact of the Scheme as permitted by the Planning Permission on crowd flow was subject to detailed consideration as part of the planning process.</p> <p>Issues relating to crowd flow were the subject of a Crowd Flow Study undertaken on behalf of Lendlease, a review by an independent crowd flow expert appointed by the Council and various objections submitted on behalf of the objector.</p> <p>Both the Crowd Flow Study and the Council's independent review concluded that crowd control measures to be provided both during and after construction will provide at least equivalent provision for the THFC Stadium crowds queuing for the Station and that post construction the situation for THFC Stadium crowds will be improved.</p> <p>The mechanisms for securing these matters were considered by the Council's Planning Committee and considered acceptable. Such mechanisms include conditions 4, 44 and 64 of the Planning Permission which require approval of arrangements to ensure satisfactory crowd flow safety conditions are achieved both during construction and afterwards, as well as planning obligations within the section 106 Agreement that provide for an access licence to be granted to the objector.</p>
		11.	THFC considers there is an alternative vision and future for High Road West which is viable, deliverable	The objector has not provided any detail regarding its alternative vision for High Road West despite being given

	Party		Objection	Response
			and could provide genuine regeneration consistent with the aspirations of the TAAP.	<p>many opportunities during the extensive consultation period to do so.</p> <p>However, the objector's assertion that there is an "alternative vision" implies that the objector is not objecting to the principle of the Scheme but specific elements of the Planning Permission.</p> <p>As noted previously, the Planning Permission was granted by the Council following careful consideration and in accordance with the Development Plan.</p>
		12.	Section 16 of the Statement of Reasons does not include the development agreement nor the Compulsory Purchase Indemnity Agreement. Given reliance on the development agreement, it is important a full, unredacted version is made publicly available.	Redacted versions of the Development Agreement and CPO Indemnity Agreement are Core Documents and can be accessed as per the details set out at Section 19.2.
Obj 9	Adrian Sherbanov	1.	<p>The objector was only made aware in the last 2 weeks of the Order. The objector was not consulted, notified by his landlord nor the local authority nor engaged with by public consultations.</p> <p>The objector was not notified of the Order, including any timings or ways to object.</p>	<p>Section 3 of this Statement set out the comprehensive consultation and engagement process that has been carried out in relation to the Scheme.</p> <p>Specialist land referencers carried out the process necessary to identify those parties who may have an interest in the Order Land, using best practice desktop and contact referencing. As part of the land referencing process prior to the making of the CPO, two land interest questionnaires (LIQs) and reminder notices were served on the property (85 Whitehall Street), addressed to Mr Erdal Pinar and Gulseren Pinar in their capacity as the registered leasehold owners of the property.</p> <p>The LIQs included a request for information on any occupiers residing at the property. No responses were received to these documents. As a result, Mr Sherbanov's occupation of the property was not identified through the land referencing exercise prior to the making of the CPO and as such this detail was not included in the Order Schedule.</p>

	Party		Objection	Response
				As required, notices were affixed to conspicuous objects on the land comprised in the Order Land through the duration of the objection period, from 8 February 2023 until 8 March 2023. Notices were also placed in local newspapers. All the notices included details of how to object and the timescale for doing so.
		2.	The Council is aware of the objector paying Council Tax and Council paying housing benefit to landlord. It is gross negligence not including them as tenants and occupiers.	The land referencing exercise did not use data relating to Council Tax or Housing Benefits to identify the names of private tenants in residential properties. The LIQs sought to collect the most up-to-date information in relation to occupiers at properties within the Order Land, and are standard best practice. Further information in relation to the referencing process is set out above in relation to point 1.
		3.	The objector has been deprived of rights and right to object in breach of Article 1 HRA 1998 and s12 Acquisition of Land Act 1981.	Section 11 of the Statement of Case addresses the human rights balance generally. Article 6 provides (so far as relevant here) that everyone has the right to a fair and public hearing within a reasonable time in relation to the determination of their civil rights. Mr Sherbanov has objected and the objection has been accepted by the Secretary of State and Acquiring Authority. It will, if not withdrawn, be heard at the public inquiry into the Order and will be considered by the Inspector in deciding whether to confirm the Order. There is demonstrably no deprivation of Mr Sherbanov's rights under Article 6.
		4.	There has been a failure to follow correct procedure, such as serve additional or amended personal notices.	The Council served notice of the making of the Order on all those persons that it was aware of that are within the terms of section 12 Acquisition of Land Act 1981. As noted above notices were also placed on site and in local newspapers, in accordance with the statutory requirements.
		5.	There has been a gross lack of due diligence identifying tenants and occupiers.	See the response to point 1 above.

	Party		Objection	Response
		6.	<p>The Order does not consider actual social, family, equality and protected characteristics, employment and educational needs of private tenants. Accordingly, the Order is in breach of articles 1, 6 and 8 of HRA 1998.</p> <p>Does not agree with the Statement of Reasons which states the impacts are likely to be minor given the limited number of private tenants.</p> <p>The Council has not considered readily available information for private tenants and is in breach of section 12 of the Acquisition of Land Act 1981 by not identifying them as qualifying person.</p> <p>The Council did not have all the available information for social and community impact and did not understand the impact on local residents.</p>	<p>The Council has produced an Equalities Impact Assessment for the CPO. This identifies that there may be some residual adverse impacts for groups with protected characteristics who rent privately and may not be able to remain in the local area. It is stated that this is likely to particularly affect ethnic minority groups, children and women, who are overrepresented in the demographic makeup of this group.</p> <p>The impacts are assessed to be minor given the limited number of private tenants, who make up less than 15% of the residents within the Order Land. This figure was calculated by taking the number of residential properties which may have private tenants in-situ – assessed to be approximately 36 (up to 21 within the Love Lane Estate and up to 15 within the High Road properties) – of the total of c.247 occupied residential properties within the Order Land overall.</p> <p>It is recognised that potential impacts exist for those who rent privately. The Council has set out mitigation measures to reduce these as far as possible. The Rehousing and Engagement team has and will continue to liaise with individual households to ensure they are aware of the phasing timelines and of the options available to them. Tenants will have access to Haringey's Housing Services to provide support and assistance, and to independent advice from the ITLA which, as above, will recognise their specific needs. The Council will ensure that that the process for private tenants to access housing support is clear and communicated to these residents, including by providing information in other languages and interpreter support as required.</p> <p>All households on the Love Lane Estate have had correspondence including flyers and newsletters on a regular basis over the duration of the Regeneration Scheme that have provided information at its various stages, and invited</p>
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	Party		Objection	Response
				<p>residents to drop-in sessions to speak to Council officers to understand what this means for individual households.</p> <p>See also the response to point 1 above, in relation to the land referencing exercise.</p>
Obj 10	The Nail Group	1.	<p>The communication received from the objector does not object to the principle of the Scheme or the requirement for the Order to facilitate the delivery of the Scheme.</p> <p>The objection raises practical concerns regarding the relocation of the objector's existing business within the Scheme.</p> <p>The points of concern relate to:</p> <p>a) the impact upon the objector's existing premises during the construction period;</p> <p>b) the affordability of any new premises within the Scheme;</p> <p>c) the location of any new premises within the Scheme; and</p> <p>d) the costs incurred in instructing consultants to design and fit out the new premises.</p>	<p>Lendlease and the Council have been in discussions with the objector regarding the relocation of the objector's business since.</p> <p>Those discussion are ongoing with a view to the parties agreeing a suitable premises within the Scheme for the objector to relocate its existing business.</p> <p>As part of those discussions, the Council and Lendlease have confirmed the following:</p> <p>a) that vacant possession of the objector's existing premises will not be required in advance of Q2 2026;</p> <p>b) that the objector's existing business will be able to operate as usual during the delivery of the earlier phases of the Scheme up until the point that vacant possession is required;</p> <p>c) that Lendlease is willing to explore what rental terms would be workable for the objector within the context of the commitments already provided by Lendlease within the section 106 Agreement regarding minimum lease terms and rent; and</p> <p>d) that the costs associated with fitting out and relocation to a new premises are capable of forming part of any monies/ compensation payable to the objector.</p>
Obj 11	Mary Powell	1.	The Scheme amounts to social cleansing of a neighbourhood.	The Council has made commitments to existing residents to ensure that they have the opportunity to move to the new homes within the Scheme and remain at the heart of the neighbourhood. This includes new Council homes for existing secure and non-secure tenants and equity loan

	Party		Objection	Response
				<p>homes for resident leaseholders. Support will be offered through the rehousing process.</p> <p>The Council has also made commitments to businesses within the Business Charter, which states that it will endeavour to keep existing businesses and jobs within the area or within the borough - see further in section 3 of this Statement.</p>
		2.	The Council is incompetent and corrupt.	The Council strongly refute this assertion. The Council is bound by a Code of Corporate Governance that ensures adherence to the 6 key principles based on the Nolan Committee on Standards in Public Life. These include a clear definition of the organisation's purpose and desired outcomes, transparent decision making, and real accountability to stakeholders.
		3.	The vote in 2022 for demolition was dishonestly carried out with the Council lobbying residents during the ballot period.	<p>The resident ballot on the Love Lane Estate, which took place in August and September 2021, was undertaken in line with the GLA's Capital Funding Guide. The ballot was administered by an independent body, Civica Election Services (CES), who confirmed that they were satisfied that the ballot process was conducted in accordance with GLA regulations.</p> <p>The purpose of engagement by Council officers during the ballot was to ensure that voters had received their Landlord Offer and ballot papers, had the opportunity to ask an officer any questions around the offer, and were aware of where to access support.</p>
		4.	The Council has not given sufficient reason to demolish the estate.	The Council does not agree with the objector's assertion for the reasons set out in Sections 9 of this Statement. From the outset, the Council has sought to respond to the community's desire to see the creation of more socio-economic opportunities for people living and working in the area.

	Party		Objection	Response
				<p>In 2013, the Council undertook consultation with residents, businesses and the wider community on three masterplan options, which showed varying levels of intervention. Responses to the public consultation clearly demonstrated that option 3, which involved the most comprehensive redevelopment as a means to deliver more homes, employment space and facilities, was the option most favoured by residents..</p> <p>The principles set out in the agreed Masterplan have been embedded into the TAAP, part of the Local Plan, which was adopted by the Council in July 2017 following extensive development and consultation of the policies and designations, including those for High Road West.</p> <p>Further to this, the Council has worked with the residents, businesses and wider community to develop the Scheme proposals and received backing by residents for the Scheme by way of the ballot.</p> <p>The Council is confident that the Scheme for which the demolition of the Love Lane Estate is necessary, will make a significant contribution to the achievement of the promotion or improvement of the economic, social or environmental wellbeing of the area.</p>
		5.	The low-rise properties on the southern side of Whitehall Street and in Orchard Place could have been omitted.	<p>As set out within Section 1 of this Statement, the delivery of the Regeneration Scheme, which includes the Scheme, has been a key policy objective of the Council since 2012.</p> <p>Excluding that part of the Love Lane Estate which sits to the south of Whitehall Street from the Scheme would result in the Scheme failing to achieve the requirements of the adopted planning framework.</p> <p>Since 2012 the Council has undertaken various and extensive consultations on the nature and form of the regeneration of High Road West. That indicated support for a</p>

	Party		Objection	Response
				<p>comprehensive redevelopment of the Love Lane Estate in order to optimise the level of benefits delivered by the Scheme. Those consultations resulted in the adoption of the TAAP in 2017, within which High Road West is identified as a Site Allocation.</p> <p>The Site Allocation, as well as the HRWMF which is referred to therein, seek the comprehensive development of High Road West in order to deliver a new residential neighbourhood and leisure destination.</p> <p>The key requirements of the Site Allocation as well as the principles outlined within the HRWMF have been embedded into the Development Plan by virtue of the TAAP, which include the delivery of a minimum of 1,400 homes and new high quality public square, can only be fully realised through the redevelopment of the entire Love Lane Estate, including those areas located to the south of Whitehall Street.</p>
		6.	The Council has deliberately run down the Love Lane Estate.	The Council has continued to maintain the homes and communal spaces on the Love Lane Estate in accordance with its housing obligations and in response to the needs of residents in relation to their homes and the neighbourhood, since the formation of the Scheme. Residents have been supported in raising any issues through their Independent Tenant & Leaseholder Advisor (ITLA), and through the dedicated project team in liaison with Housing and other services in the Council.
		7.	The objector is unable to afford to remain in the area unless they opt in to the Ponzi scheme "Shared Equity".	The Council has developed rehousing options in consultation with existing resident leaseholders to ensure that they are able to move to the new homes within the Scheme and are not financially worse off as a result of the redevelopment. These are set out within the Council's Love Lane Leaseholder Offer (" the Leaseholder Offer ").

	Party		Objection	Response
				<p>The Leaseholder Offer includes the option for an equity loan from the Council for a replacement property, where leaseholders continue to own 100% of the property, and are not required to pay rent or interest on the equity loan.</p> <p>For new homes in the Scheme, the Council will contribute up to 75% of the value of the new property through the equity loan, to ensure that these are affordable. Should a leaseholder not be able to contribute 25%, then individual circumstances will be considered to find the most appropriate way to enable leaseholders to stay in the area without adversely affecting their financial situation.</p> <p>The financial basis of the equity loan offer is solely between the Council and the leaseholder taking up this offer and has no financial relationship to any other leaseholders or their properties. Similar equity loan schemes are commonplace and have successfully operated on many other estate regeneration schemes.</p>
		8.	The area will no longer be affordable.	<p>Pursuant to the section 106 Agreement entered into alongside the Planning Permission, at least 40% (by habitable room) of the new homes constructed within the Scheme will be affordable homes.</p> <p>This includes the provision of 500 social rented Council homes.</p> <p>Furthermore, and as set out more fully in Section 12 of this Statement, the Landlord Offer and Love Lane Leaseholder Offer contain various commitments and guarantees which seek to enable existing eligible residents to relocate within the Scheme.</p>
		9.	The objector has not yet received indication from the Council as to the value of the property.	The Council has sought to open negotiations with the objector regarding the purchase of their property, most recently through letters sent in November 2021, March 2022, November 2022, and January 2023.

	Party		Objection	Response
				Following correspondence by email following receipt of the objection, an offer for the objector's property was made on 16 May 2023. The Council is awaiting feedback on the offer and on a suitable time for the objector to meet to discuss this and rehousing options further.
		10.	The Council are seeking high density apartment blocks facing an oversized football stadium.	<p>The size and density of the Scheme was developed in consultation with stakeholders, including residents of the Love Lane Estate, through the planning process. That consultation built upon the significant public consultation which led to the adoption of the HRWMF and the later adoption of the TAAP.</p> <p>The location and size of the proposed blocks therefore reflects the adopted planning framework which identifies High Road West (which includes the Order Land) as being suitable for tall buildings.</p>
		11.	The remaining social tenants are to be moved to a poor block on the other side of the railway tracks out of sight.	<p>It is a priority of the Council and Lendlease to deliver the new affordable homes, including replacement homes for existing residents, as quickly as possible.</p> <p>The first plot within the Scheme is Plot A, located immediately west of the railway line. This plot was identified as a suitable site to commence the Scheme given the Council's ability to obtain vacant possession and provides the opportunity for some existing residents to make a single move to their new home. These new homes have been designed with existing residents through the planning process and the design of the homes and the blocks, including the heights of the blocks in Plot A, and the spaces and facilities around the blocks have been developed to reflect resident feedback.</p> <p>The remainder of the replacement and additional affordable homes are currently planned to be located within Plots B & C of the Scheme, fronting onto the new public square and nearby the High Road. Plots B and C are the next plots due</p>

	Party		Objection	Response
				to come forward after Plot A, and will be progressed through engagement with residents and the community based on the same principle of delivering homes that meet the needs and aspirations of the residents and community who will benefit from them.
		12.	The objector was unable to attend drop-in sessions.	As set out in its letters to and correspondence with leaseholders, the Council would like to meet with all leaseholders and is willing to arrange a meeting in a location and time that is suitable to them.

APPENDIX 2

Core Documents

Order Documents	
CD 1.1	The Order dated 26 January 2023 (Redacted)
CD 1.2	Unsealed version of Order Map
CD 1.3	Sealed version of Order Map
Decisions made by the Acquiring Authority	
CD 2.1	Cabinet report of 8 November 2022 authorising the making of the CPO
CD 2.2	Appendix 2 attached to Cabinet report of 8 November 2022 authorising the making of the CPO – Draft Order Plan
CD 2.3	Appendix 5 attached to Cabinet report of 8 November 2022 authorising the making of the CPO – Equalities Impact Assessment (EqIA) of the CPO
CD 2.4	Appendix 6 attached to Cabinet report of 8 November 2022 authorising the making of the CPO – Appropriation Plan – Plot D
CD 2.5	Appendix 7 attached to Cabinet report of 8 November 2022 authorising the making of the CPO – Appropriation Plan – Open Space Land
CD 2.6	Appendix 8 attached to Cabinet report of 8 November 2022 authorising the making of the CPO – Public Notice of Intention to Appropriate and Dispose of Open Space Land
CD 2.7	Appendix 11 attached to Cabinet report of 8 November 2022 authorising the making of the CPO – Appropriation Plan – Plot A
CD 2.8	Minutes of 8 November 2022 authorising the making of the CPO
Planning policy documents	
CD 3.1	National Planning Policy Framework (last updated 20 July 2021)
CD 3.2	London Plan 2016, the spatial development strategy for London consolidated with alterations since 2011
CD 3.3	London Plan 2021
CD 3.4	London Borough of Haringey Local Plan – Strategic Policies 2013 (with alterations 2017)
CD 3.5	Tottenham Area Action Plan (2017)
CD 3.6	High Road West Masterplan Framework 2014
Planning Permission HGY/2021/3175 documents	
CD 4.1	Application form
CD 4.2	Planning statement
CD 4.3	Parameter plans
CD 4.4	Development specification
CD 4.5	Design code
CD 4.6	Design and access statement
CD 4.7	Statement of Community Involvement (October 2021)
CD 4.8	Addendum to Statement of Community Involvement (February 2022)
CD 4.9	Report to 21 July 2022 Planning Sub-committee
CD 4.10	Appendix 1 attached to Report to 21 July 2022 Planning Sub-committee – Images of the site and proposed scheme
CD 4.11	Appendix 2 attached to Report to 21 July 2022 Planning Sub-committee – Internal and External Consultee Representations
CD 4.12	Appendix 3 attached to Report to 21 July 2022 Planning Sub-committee – Neighbour Representations
CD 4.13	Appendix 4 attached to Report to 21 July 2022 Planning Sub-committee – Mayor of London Stage 1 Report

CD 4.14	Appendix 5 attached to Report to 21 July 2022 Planning Sub-committee – Planning Sub Committee Minutes (25 October 2021)
CD 4.15	Appendix 6 attached to Report to 21 July 2022 Planning Sub-committee – Development Management Form (13 October 2021)
CD 4.16	Appendix 7 attached to Report to 21 July 2022 Planning Sub-committee – Quality Review Panel report (27 June 2018)
CD 4.17	Appendix 8 attached to Report to 21 July 2022 Planning Sub-committee – Quality Review Panel report (30 January 2019)
CD 4.18	Appendix 9 attached to Report to 21 July 2022 Planning Sub-committee – Quality Review Panel report (28 April 2021)
CD 4.19	Appendix 10 attached to Report to 21 July 2022 Planning Sub-committee – Quality Review Panel report (23 June 2021)
CD 4.20	Appendix 11 attached to Report to 21 July 2022 Planning Sub-committee – Quality Review Panel report (17 September 2021)
CD 4.21	Appendix 12 attached to Report to 21 July 2022 Planning Sub-committee – Quality Review Panel report (2 March 2022)
CD 4.22	Appendix 13 attached to Report to 21 July 2022 Planning Sub-committee – Plans and Documents List, item 8
CD 4.23	Appendix 14 attached to Report to 21 July 2022 Planning Sub-committee – Planning conditions
CD 4.24	Appendix 15 attached to Report to 21 July 2022 Planning Sub-committee – Heritage Impact Assessment
CD 4.25	Addendum High Road West Addendum Report attached to Report to 21 July 2022 Planning Sub-committee
CD 4.26	Minutes of 21 July 2022 Planning Sub-committee
CD 4.27	Decision notice from Secretary of State ref: HGY/2021/3175 and dated 31 August 2022
CD 4.28	Decision notice granting planning permission ref: HGY/2021/3175 and dated 31 August 2022
CD 4.29	Agreement pursuant to section 106 of the Town and Country Planning Act 1990, dated 31 August 2022
CD 4.30	Delegated Report dated 31 August 2022
CD 4.31	Decision notice ref: HGY/2022/3937 dated 10 February 2023
Other documents:	
CD 5.1	DLUHC Guidance on Compulsory purchase process and The Crichele Down Rules July 2019
CD 5.2	DCLG Estate Regeneration National Strategy December 2016
CD 5.3	Mayor of London's 'Better homes for local people - The Mayor's Good Practice Guide To Estate Regeneration'
CD 5.4	CPO Indemnity Agreement dated 20 December 2017
CD 5.5	Development Agreement dated 20 December 2017
CD 5.6	Love Lane Landlord Offer, July 2021
CD 5.7	High Road West Regeneration Proposals, Business Charter
CD 5.8	Business Support Leaflet, May 2023
CD 5.9	Scheme Phasing Plan, May 2023