

Joanne



Carter Jones  
SOLICITORS

The Secretary of State for Housing  
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Our ref: EI/A160-3/Broadwater  
Your ref:

1<sup>st</sup> March 2021

Dear Sir,

**RE: The London Borough of Haringey (Tangmere and Northolt)**  
**Compulsory Purchase Order 2021**

We act on behalf of:

- ██████████ - 26 Tangmere
- ██████████ - 26 Tangmere
- ██████████ - 29 Tangmere
- ██████████ - 29 Tangmere
- ██████████ - 72 Tangmere
- ██████████ - 122 Tangmere
- ██████████ - 122 Tangmere

who each own a leasehold interest within the land identified as Tangmere in the above Compulsory Purchase Order.

We believe ourselves to be the duly authorised agents to the above-named statutory objectors to the scheme and ask you to confirm, as soon as possible, if you feel that there is anything legally or administratively wrong with the objection or if you require it in any different form.

We write on behalf of our clients to object to the Compulsory Purchase Order made by London Borough of Haringey ("the Council") on 28<sup>th</sup> day of January 2021. Our clients object to the Compulsory Purchase Order being confirmed on the following grounds:

1. There is no statutory support for the construction of replacement housing involving the demolition of an already densely populated area of housing. The reliance of the Council on s17 of the Housing Act 1985 and the Acquisition of Land Act 1981 is inappropriate.
2. The proposed construction of replacement housing accommodation in that location without delivering a quantitative housing gain suggests there is no compelling case in the public interest for the making of a Compulsory Purchase Order. The Council claim they will simply "*explore all options to deliver a quantitative gain if possible*" [ para 1.9 statement of reasons]. The construction of new housing on the Broadwater Farm Estate should be part of a masterplan for the modernisation of the entire estate to include more affordable homes.
3. The Council has failed to adequately or at all, consider the alternative to demolition. There is a perfectly sensible and alternative option of strengthening and refurbishing the existing accommodation which has not been properly investigated and costed by the Council. We ask the Secretary of State to give the plan the proper scrutiny of a public enquiry.
4. The Council has provided insufficient detail about the funding position of its proposed works and whether the CPO has sufficient certainty. This matter deserves the proper scrutiny of a public enquiry. The long history of under

investment by the Council into the estates at Broadwater Farm are material to the question of relative costings for the competing options.

5. The Council's scheme amounts to forced displacement as there was no ballot on whether homes should be demolished or strengthened, modernised and refurbished. The consultation exercise was inadequate leading to little engagement. Para 5.21 of the Statement of Reasons suggest no more than 38 out of 104 properties at Tangmere responded positively. The Council has acted undemocratically by failing to properly engage.
6. Some leaseholders are currently engaged in negotiations. The use of draconian compulsory purchase powers is premature and should only be used as a measure of last resort where negotiations fail. Therefore, there is not an adequate or compelling justification to confirm the proposed CPO in respect of our clients' land interests.

We respectfully reserve the right to add to and expand the grounds of objection set out above in the event that ongoing negotiations with the Council are not progressed to the Objector's satisfaction.

Please address all correspondence to the undersigned at the address or e-mail given.

Yours faithfully

  
**Carter Jones Solicitors,**

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