TOWN & COUNTRY PLANNING ACT 1990

ACQUISITION OF LAND ACT 1981

LONDON BOROUGH OF TOWER HAMLETS (HARRIOTT HOUSE, APSLEY HOUSE, PATTISON HOUSE) COMPULSORY PURCHASE ORDER 2025

STATEMENT OF CASE

Under Rule 7 of the Compulsory Purchase (Inquiries Procedure) Rules 2007

Planning Inspectorate Reference: APP/PCU/CPOP/E5900/3365599

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1 Introduction

1.1 This document is the Statement of Case of the London Borough of Tower Hamlets (the **Council**) as acquiring authority pursuant to Rule 7 of the Compulsory Purchase (Inquiries Procedure) Rules 2007 and in compliance with the Ministry of Housing, Communities & Local Government "Guidance on the Compulsory Purchase Process" (October 2024) (the **Guidance**) (**CD 3.4**).

1.2 On 15 April 2025 the Council made a compulsory purchase order (**CPO**) titled the London Borough of Tower Hamlets (Harriott House, Apsley House, Pattison House) Compulsory Purchase Order 2025 (the **Order**) (**CD 1.1**). The Order was made pursuant to section 226(1)(a) of the Town and Country Planning Act 1990 (the **1990 Act**) (**CD 7.1**). The Council is the local planning authority and local highway authority for the land included within the Order (the **Order Land)**. It is also the freehold owner of the Order Land (save for a small parcel of unregistered land comprising Plot 1) and the wider Estate (defined below).

1.3 The Order Land is shown coloured pink (land to be acquired compulsorily) on the map attached to the Order (**CD 1.2**) (the **Order Map**). The Order Land contains buildings known as Harriott, Apsley and Pattison Houses (hereinafter referred to as **HAP Houses**) and the Redcoat Community Centre. The Order Land forms part of the wider Harriott, Apsley and Pattison Houses estate (hereinafter referred to as the **Estate**).

1.4 Authorisation to make the Order was given by the Council's Cabinet on 16 October 2024 (**CD 2.6**). Cabinet resolved to make the Order for the acquisition of all leasehold interests (and any other interests and rights as may be required) in the Order Land as well as any other necessary land interests within the area to facilitate the regeneration of the Order Land. Cabinet also delegated powers to the Corporate Director of Housing and Regeneration and the Director of Legal Services and Monitoring Officer (in consultation with the Mayor and Cabinet Member for Regeneration, Inclusive Development and Housebuilding) the power to effect the making, confirming and implementation of the Order.

1.5 The Order was submitted along with supporting documents (including the Council's Statement of Reasons (**CD 1.3**)) to the Secretary of State for Housing, Communities and Local Government (the **Secretary of State**) for confirmation on 15 May 2025.

1.6 Objections to the Order were received and the Secretary of State by way of a letter dated 17 June 2025 has given notice of an intention to hold an inquiry into the objections raised.

1.7 If confirmed by the Secretary of State, the Order will enable the Council to compulsorily acquire interests in the Order Land in order to facilitate the comprehensive regeneration of the Estate in accordance with adopted planning policy and a planning permission.

1.8 This Statement sets out the particulars of the Council's case for the making of the Order. It seeks to supplement the Council's Statement of Reasons (**CD 1.3**), which should be read in conjunction with this Statement. The document sets out the case as to why the Council considers that the powers of compulsory purchase contained in the Order are necessary, and why there is a compelling case in the public interest that the Order be confirmed by the Secretary of State. It addresses the issues raised by the objectors to the Order in section 12.

1.9 On 31 January 2024 Cabinet granted approval for the Council to take all necessary steps to affect the appropriation of the Estate for planning purposes (**CD 2.4**) in accordance with

section 122(1) of the Local Government Act 1972 (**CD 7.2**). On 16 October 2024 Cabinet agreed that the Council may rely on powers of appropriation under section 203 of the Housing and Planning Act 2016 (**CD 7.3**) to interfere with and override existing rights over the Estate, subject to the Secretary of State's consent in respect of the appropriation (**CD 2.6**). The Secretary of State's consent was subsequently given on 29 October 2024 (**CD 2.7**). The land subject to the appropriation is shown on the plan at **CD 5.8**.

1.10 The proposed redevelopment of the Estate comprises a residential-led mixed-use development, with the delivery of more than 400 new homes and a new community centre on Council-owned land currently occupied by existing housing blocks and two community buildings (hereinafter referred in this Statement as the **Scheme**). The Scheme benefits from the grant of planning permission (please see section 6.1 of this Statement and **CD 4.2**).

1.11 The Council considers that its proposals for the Scheme are supported by planning policy at national, regional, and local level. The Council's aims and objectives for the Scheme are consistent with policy objectives of the National Planning Policy Framework (December 2024) (the **NPPF**) (**CD 3.1**), the London Plan (2021) (**CD 3.2**) and the Council's Local Plan (adopted on 15 January 2020) (**CD 3.3**). The Scheme presents an opportunity to deliver a new landmark development, creating a sense of identity, providing modern homes and community facilities. The policy context of the Scheme and the extent to which the Scheme complies with relevant policy is set out in detail in section 6 of this Statement. The Scheme will deliver both a qualitative and quantitative housing gain, as well as a community centre which is fit for purpose to serve the local community.

1.12 The Council has consulted widely on the Scheme and has undertaken an extensive engagement exercise with existing residents of HAP Houses, as well as other stakeholders. Further detail as to the consultation and engagement is set out at section 8 of this Statement and the Council's response to objections received is provided at section 12.

1.13 The Council recognises that, in line with the Guidance, a CPO can be made if there is a compelling case in the public interest which justifies the acquisition of private rights in the land they are seeking to acquire (paragraph 2 and 12 of the Guidance (**CD 3.4**)). The Council is satisfied that the Order will meet this requirement and that the delivery of the Scheme will satisfy the test in s226(1A) 1990 Act (**CD 7.1**) by contributing to the promotion and improvement of the economic, social and environmental well-being of the area. The justification for the use of compulsory purchase powers is set out at section 7 below.

1.14 The Council has sought to acquire interests in the Order Land by negotiation. Despite the efforts and progress made by the Council in seeking to acquire all interests by agreement, it is clear that in order to deliver the Scheme within a reasonable timescale, the Council's compulsory purchase powers must be used. Information as to the efforts and negotiations that have taken place with a view to acquiring the required land and rights, as well as details on the Landlord Offer are set out at section 8 below.

1.15 As set out in section 7.10 of this Statement, the Council does not envisage that there will be any impediments to the Scheme progressing.

1.16 In deciding to make and progress the Order, the Council has had full regard to the requirements of the Human Rights Act 1998. The Council has carefully considered the balance to be struck between individual rights and the wider public interest and has also had regard to whether there are any alternative means of securing the redevelopment of the Order Land and the associated regeneration of the Estate. The Council has concluded that

the interference with rights caused by the Order is proportionate when weighed against the significant benefits which will be delivered by the Scheme as set out in this Statement at sections 7.8 and 9. On 16 October 2024 Cabinet also agreed that the public interest in enabling the development of the Order Land outweighs the interference with relevant rights under the European Convention on Human Rights (**CD 2.7**).

1.17 Details of the Equalities Impact Assessment (the **EqIA**) (**CD 5.10**) carried out in respect of the Scheme is set out in section 10 of this Statement. In summary, the Scheme will benefit future residents, including those with protected characteristics. The Council will continue to monitor the Equalities Impact Assessment and will work closely with residents to mitigate impacts of the Scheme.

1.18 If the Order is confirmed by the Secretary of State (or by the self-confirmation by the Council following authorisation of such by the Secretary of State), the Council intends to execute a General Vesting Declaration and if required any Notices to Treat, in order to secure unencumbered title to the Order Land.

1.19 The Council is also applying for a stopping up order in respect of highway to the northwest of the Order Land required to facilitate the delivery of the Scheme. Further details on the stopping up order required can be found at section 7.10.5 of this Statement.

1.20 The Council supports the Order and wishes it to be brought forward to facilitate the Scheme and redevelopment of the Estate in accordance with planning and housing policies for the London Borough of Tower Hamlets.

1.21 All documents referred to in this Statement are listed in the table in section 14 below.

2 The Order Land

2.1 The Order Land is required to facilitate the redevelopment of the Estate and the Order is needed to secure the necessary land assembly within a reasonable timescale.

2.2 The Council has given careful consideration to the need for the land comprising the Order Land and is satisfied that all of the land included within the Order is necessary and justifiable, as detailed below.

2.3 The Order Land forms part of the Estate which covers a total area of 1.79 hectares and is bounded by Stepney Way to the north, Jamaica Street to the west, Aylward Street to the south and Wellesley Street to the east. In addition to residential properties, the Order Land comprises an area of unregistered highway land on Jamaica Street situated southeast of the junction with Stepney Way and an electricity substation. A Map of the Order Land and a plan of the whole Estate (which contains the Order Land) are appended to this Statement at **CD 1.2** and **CD 4.3** respectively.

2.4 The Estate contains three housing blocks, being HAP Houses, which were built in 1954, as well as two community buildings being the Redcoat Community Centre and Redcoat Centre. The community use buildings are positioned directly to the north of Pattison House on Stepney Way.

2.5 HAP Houses are configured over 4-8 storeys on a largely vertical grid with Apsley House aligned to the centre, Harriott House to the west and Pattison House to the east. Within HAP Houses there are currently 100 homes comprising (prior to commencement of buybacks):

2.5.1 28 resident leaseholders;

2.5.2 31 non-resident leaseholders;

2.5.3 36 secure tenants; and

2.5.4 5 temporary accommodation units.

2.6 The community buildings consist of The Redcoat Centre, a single-storey building that was formerly jointly occupied by the Council's Adult Services department and an organisation (Vibrance) providing services for vulnerable adults, and the Redcoat Community Centre together with 4 conjoined single-storey portacabin structures which are used as a Mosque.

2.7 The remainder of the Estate consists of a mixture of hardstanding areas and vehicular access and 58 car parking spaces (used on a licence basis), and soft landscaping in the form of vertical sections of grass (and some planted areas) running north to south between HAP Houses. There is also an existing substation and ancillary storage facilities utilised by the residents of HAP Houses on a licence basis, a small number of which are to be retained.

2.8 There are five bus routes within 650 metres of the Estate. Limehouse Station is 900 metres south-east of the site and provides access to National Rail services and Docklands Light Railway services between Bank and Lewisham, Bank and Woolwich Arsenal and Tower Gateway and Beckton. The Estate is approximately an 11-minute walk from Stepney Green Underground Station, which is served by the Hammersmith & City, District and Circles lines and a 12-minute walk from Whitechapel Station which is served by Hammersmith & City, District, London Overground and Elizabeth lines. The Public Transport Accessibility Level (PTAL) rating across the site is "4" and "5" indicating a 'Good' level of public transport accessibility.

3 The Council's Power to Acquire Land Compulsorily

3.1 Section 226(1)(a) of the 1990 Act enables the Council to acquire land compulsorily if it considers that the acquisition will facilitate the carrying out of development, redevelopment or improvement on or in relation to land in its area. This power is subject to section 226(1A) which provides that the Council must not exercise powers of compulsory purchase unless it considers that the proposed development, redevelopment or improvement is likely to contribute to the achievement of any one or more of the following objectives:

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

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

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

3.2 The compulsory acquisition of the Order Land is necessary for the delivery of the Scheme. The Scheme will make a significant contribution to the environmental, social and economic well-being of the existing residents of the Estate, the Stepney Green ward and the Council's wider borough.

3.3 The Guidance (**CD 3.4**) states at paragraph 98.1 that the power under section 226 of the 1990 Act (**CD 7.1**) is expressed in wide terms and can, therefore, be used to assemble land for regeneration. This view is now confirmed through the new sub-section 1B to section 226

of the 1990 Act, which states that "In the application of subsections (1) and (1A) in England, "improvement" includes regeneration". The Guidance provides recommendations to acquiring authorities on the use of compulsory purchase powers and the Council has taken full account of these recommendations in the progression of and making of the Order.

3.4 As set out in paragraph 109 of the Guidance, where land is being assembled pursuant to section 226(1)(a) of the 1990 Act, the Secretary of State will have regard to development plan policies and national planning policies when determining whether to confirm an order. These factors include the following:

3.4.1 Whether the purpose for which the land is being acquired fits in with the development plan for the area and the NPPF (**CD 3.1**) (please see section 6 of this Statement for further consideration of this);

3.4.2 The extent to which the proposed purpose will contribute to the achievement of the promotion or improvement of the economic, social or environmental well-being of the area (please see section 7.8 of this Statement for details as to how the Scheme will meet these requirements);

3.4.3 Whether the purpose for which the local authority is proposing to acquire the land could be achieved by other means (please see sections 7.11 and 7.12 of this Statement); and

3.4.4 The potential financial viability of the scheme for which the land is being acquired. A general indication of funding intentions, and any commitment from third parties, will usually suffice to demonstrate that there is a reasonable prospect that the scheme will proceed (see section 4.3 of this Statement which details the funding of the Scheme).

3.5 Please also see section 7.5 of this Statement which explores paragraph 109 and 110 of the Guidance further.

3.6 Section 6A(1) of the Land Compensation Act 1961 (the **LCA 1961**) provides that "The no-scheme principle is to be applied when assessing the value of land in order to work out how much compensation should be paid by the acquiring authority for the compulsory acquisition of the land" (see rule 2A in section 5 LCA 1961) (**CD 7.4**). Section 6D of the LCA 1961 confirms that for the purposes of section 6A, the "scheme" means the scheme of development underlying the acquisition. The Order authorises the compulsory acquisition of land for the purposes of facilitating the regeneration of the Estate. As such, the 'scheme' for the purposes of the LCA 1961 to be disregarded for the purposes of assessing compensation is the redevelopment of the Order Land and the wider Estate.

3.7 Having regard to the nature of the proposals and the Guidance, the Council is satisfied that the use of its compulsory purchase powers under section 226(1)(a) of the 1990 Act (**CD 7.1**) is justified in order to facilitate the Scheme and achieve its objectives. Details of the justification of the use of compulsory purchase powers are contained in section 7.

4 The Scheme

4.1 Background to the Scheme

4.1.1 The Scheme proposes a comprehensive redevelopment of the Estate.

4.1.2 The Council considers that the Scheme pursuant to the Planning Permission (defined below) will deliver qualitative and quantitative improvements to the existing housing stock to meet local housing need, improve social facilities and environmental amenity, and is supported at all levels of current planning policy. The Scheme will also deliver a new fit for purpose community facility.

4.1.3 This Scheme will be car-free, with the exception of provision being made for accessible car parking on site. Existing tenants will be able to retain their rights to apply for a parking permit after transferring into one of the new homes in the proposed development, but this will be for general on-street parking only (CPZ permit). Provision will be made for cycle parking in accordance with planning policy requirements.

4.1.4 The Council is the freehold owner of the Order Land (with the exception of Plot 1, which comprises unregistered land). However, there are leasehold interests within the Order Land. To date, the Council has successfully acquired a total of **19** leaseholder interests (comprising **7** resident leaseholder interests and **12** non-resident leaseholder interests) in the Order Land by way of negotiated settlements. This leaves a total of **45** leasehold interests (comprising **23** resident leaseholders and **22** non-resident leaseholders) to be acquired. Full details of the owners and their outstanding interests are contained in the Schedule to the Order (**CD 1.1**) and shown on the Order Map (**CD 1.2**).

4.1.5 As detailed above (and in greater detail at section 8), despite the Council's ongoing efforts to acquire the remaining interests by negotiation, there are leaseholders whose interest in the Order Land the Council has not been able to acquire. The Council also needs to acquire any interests in the substation within the Estate and an area of unregistered land which currently forms part of a public highway in order to carry out redevelopment. In order to deliver the Scheme, it is essential that the Council is able to secure vacant possession of the Order Land and it is unlikely that the Council will be able to agree terms for the acquisition of the remaining interests in the Order Land within a reasonable timeframe. Consequently, all of the remaining interests must be acquired by the Council and the Council considers it necessary to utilise its power of compulsory purchase in order to achieve this and facilitate the Scheme. The Council will, nonetheless, continue to engage with leaseholders and attempt to acquire the remaining interests in the site via private negotiation.

4.2 Evolution of the Scheme

4.2.1 In July 2019, the Council started to talk to residents of HAP Houses, the community utilising the Redcoat Community Centre and Mosque and other stakeholders about the potential to regenerate the Estate. A Residents' Ballot was subsequently held between 18 March and 9 April 2020 and which found that the majority of residents were in favour of redevelopment. Section 8 of this Statement details the Council's efforts to consult and engage with local residents.

4.2.2 In September 2020, a report was taken to Cabinet regarding the capital programme and which confirmed that the regeneration of the Estate was a priority for funding as part of the new Council homes programme (see paragraph 11.3.18 of **CD 2.1**). Funding is addressed in detail at section 4.3 of this Statement.

4.2.3 Over the course of 2021 the Council was in the process of developing the planning application for the 2023 Permission (defined at section 4.4.1 of this Statement) which was submitted to the Council and validated in December 2021.

4.2.4 In December 2021, Cabinet approved a budget to fund the first three years of the delivery programme (further details in section 4.3) and noted an intention to use powers of compulsory purchase and appropriation in respect of the proposed regeneration of the Estate (**CD 2.3**). Cabinet also agreed to the proposed procurement route to secure a suitable developer partner to deliver the Scheme.

4.2.5 As detailed in section 4.4 below, the 2023 Permission was granted on 9 August 2023 for the regeneration of the Estate (**CD 4.1**). In June 2023, the Council engaged in pre-application discussions regarding a proposed alternative planning application to reconfigure the community use floorspace into a separate standalone building and the addition of second staircases to all buildings over 18m in height to provide a secondary means of escape (and access) in the event of an emergency. Between June 2023 and January 2024, the Council underwent pre-application discussions regarding the new application. During this period the Council undertook various local resident consultations prior to the submission of the application (detailed further in section 8 of this Statement). The Council submitted a further application on 1 March 2024 and which was allocated reference PA/24/00368 and subsequently granted on 27 June 2025 (**CD 4.2**).

4.2.6 On 31 January 2024, Cabinet granted approval for the Council to take all necessary steps to affect the appropriation the Estate for planning purposes (**CD 2.4**) in accordance with section 122(1) of the Local Government Act 1972 (**CD 7.2**). On 16 October 2024, Cabinet agreed that the Council may rely on powers of appropriation pursuant to section 203 of the Housing and Planning Act 2016 to override existing rights over the Estate, subject to the Secretary of State's consent in respect of the appropriation (**CD 2.6** and **CD 7.3**). The Secretary of State's consent was subsequently given on 29 October 2024 (**CD 2.7**). Following the appropriation for planning purposes, the Council is able to exercise powers under section 203 of the Housing and Planning Act 2016 to interfere with existing rights annexed to adjoining land that may adversely affect the Estate. Section 203 does not extinguish adjoining owners' rights but allows a specific development to proceed in accordance with the grant of planning permission. The statutory objective of section 203 is that, provided that the development is undertaken in accordance with a planning permission and subject to other criteria being satisfied, a local authority should be permitted to develop its land in the manner in which it, acting bona fide, considers will serve the public interest and to that end it is recognised that a local authority should be permitted to interfere with third party rights.

4.2.7 On 16 October 2024, Cabinet resolved that the Order may be made to acquire all leasehold interests (and any other interests and rights as may be required) in the Order Land to facilitate the regeneration of the Order Land (**CD 2.6**).

4.2.8 The Invitation To Tender (the **ITT**) for a development partner was published in February 2024. As detailed in section 4.3 the Council has awarded Countryside the first stage contract under a Pre-Construction Services Agreement (the **PCSA**). The PCSA was entered into on 17 December 2024 and related to

services including detailed design development, surveys, planning condition discharge to facilitate the design and construction of the Scheme. Countryside also entered into a minor works building contract with the Council on 3 July 2025 to demolish ancillary structures on the Estate, in preparation for the main construction.

4.3 **Funding of the Scheme**

4.3.1 In July 2019, an initial £2 million was allocated by the Council to deliver the design and consultation stage for the Scheme.

4.3.2 As part of the Council's Strategic Plan 2022-2026 (**CD 3.8**), the Council has an objective to deliver a minimum of 1,000 social homes for rent each year (referred to as the first 1,000 homes programme). In September 2020, a report was taken to Cabinet regarding the capital programme and which confirmed that the regeneration of the Estate was the next priority for funding and allocated to the Council's first 1,000 homes programme and capacity within the Housing Revenue Account (HRA) for the next phase was being assessed (**CD 2.1**).

4.3.3 In November 2021, Cabinet approved an uplift in the approved budget to £2.8 million (**CD 2.2)**. This has funded the pre-development stage from initial consultation to planning submission.

4.3.4 On 15 December 2021, the Council's Cabinet approved a further budget of £86 million towards the delivery of the first three years of the Scheme (**CD 2.3**). This budget is sufficient to cover anticipated land assembly costs, land acquisition settlements, design and planning fees, fees associated with procurement and legal activities as well as full delivery of the first phase of development which primarily includes the proposed replacement homes. Cabinet also delegated powers to officers to enter into necessary agreements with affected landowners to deliver the Scheme.

4.3.5 Funding has also been secured from the Greater London Authority (the **GLA**) amounting to approximately £4.8 million and the Council is in ongoing discussions with the GLA as to further funding being provided.

4.3.6 Approximately £5.4 million has been spent bringing the scheme forward to date.

4.3.7 A further report was taken to Cabinet in February 2025 and which resulted in additional funds for Scheme being awarded. These funds will be sufficient to meet all costs to date including costs obtaining planning permission, but will also cover all anticipated land assembly costs as well as the cost of delivering the replacement homes in Phase 1.

4.3.8 As noted above, the Council is in the midst of a two-stage procurement process for its development partner to bring forward the Scheme. Countryside have been awarded the first stage contract under the PSCA. Given the advanced stages of negotiation with Countryside, the Council anticipates that the development agreement will be entered into early in 2026.

4.3.9 The intention is for the balance of funding for the Scheme to be provided by the development partner and, given that the issued ITT attracted interest from a

number of well-established developers and the advanced negotiations with Countryside, the Council is confident that the balance of the funding will be forthcoming from private sector. The Council therefore considers that funding is available to complete the land assembly required and to progress the Scheme, with funding for the full delivery of the Scheme being available following the appointment of the development partner in 2025.

4.3.10 Consequently, the Council is confident that the necessary funding will be available at the relevant stages in the development of the Scheme and so does not consider there to be any financial impediments to the delivery of the Scheme.

4.4 Planning Permission for the Scheme

4.4.1 Planning permission ref. PA/21/02703 was granted on 9 August 2023 in respect of the regeneration of the Estate (the **2023 Permission**) (**CD 4.1**). The Council submitted a further application on 1 March 2024 and which was allocated reference PA/24/00368 (the **Planning Application**). The Planning Application constitutes a revision to the 2023 Permission and secures a new location within the Order Land for the Redcoat Community Centre and Mosque so that it is located within a standalone building, rather than being located below residential flats as per the consented 2023 Permission. The Planning Application also secures an additional staircase to provide a secondary means of escape and access in the event of an emergency to comply with the Building Regulations 2010 for new residential buildings over 18 metres in height. On 12 June 2024 the Development Committee resolved to grant planning permission pursuant to the Planning Application (**CD 2.5** - the **2024 Committee Report**). The Planning Permission decision notice was issued on 27 June 2025 (the **Planning Permission**) (**CD 4.2**).

4.4.2 The Planning Permission is for the redevelopment of the Estate comprising the demolition of existing buildings (including HAP Houses, the Redcoat Community Centre and Mosque) to provide 407 residential units (Class C3) across buildings ranging in height from 4-8 storeys and community centre building of 1,167m2 GIA (Class E (e-f), Class F1 (e-f), Class F.2 (b)), together with associated landscaped communal amenity space, accessible car parking, secure cycle parking spaces and refuse/recycling storage facilities. The benefits of the proposed redevelopment of the Estate are explained in more detail in section 7.8 of this Statement. The full extent of the Estate subject to the Planning Permission is identified on the plan at **CD 4.3**.

4.4.3 It is intended that the Scheme will be delivered through the implementation of the Planning Permission. The absence of planning impediments is addressed further at Section 6 below.

4.5 Delivery of new homes

4.5.1 The Scheme will see the delivery of 407 new homes within the Estate in replacement of the existing 100 homes. The existing 100 homes on the site comprise of 32 x 2 bedroom homes, 60 x 3 bedroom homes and 8 x 4 bedroom homes. Tables 1, 2 and 3 below detail the new homes intended to be provided pursuant to the Planning Permission.

4.5.2 The proposed new homes are arranged within two perimeter blocks, with a new central green street between them. Each block has its own secure private internal courtyard. The Scheme will provide an improved, accessible, well-connected and sustainable network of open space and high-quality public realm.

4.5.3 Each building within the perimeter blocks will have its own secure entrance and the right-hand perimeter block will have podium parking for the wheelchair-accessible homes. All the buildings will have separation distances of at least 18m to maintain good levels of privacy and prevent any unreasonable overlooking.

Table 1 – Proposed Housing Mix pursuant to the Planning Permission

Tenure Type	**Number of Units**
Existing Resident Leaseholders (re-provided homes)	28
Existing Secure Tenants (re-provided homes)	36
London Affordable Rent	22
Tower Hamlets Living Rent	69
Shared Ownership	20
Private Sales	232
Total	**407**

4.5.4 The new homes are being designed to meet the planning policy requirements for sustainability, aiming to achieve an estimated site-wide CO2 emission reduction of at least 45% over the Target Emission Rate using the SAP 10 emission factors, through a combination of energy conservation measures, renewable heat, and electricity generation technologies, such as photovoltaic solar panels and air source heat pumps.

Table 2 – Proposed housing mix (re-provided homes)

Tenure Type	**Tenure Mix – Units**	**Unit Mix**	
		Unit Size	**Unit Count**
Existing Resident Leaseholders	28	1 Bed	0
		2 Bed	4
		3 Bed	19
		4 Bed	5
Existing Secure Tenants	36	1 Bed	1
		2 Bed	9
		3 Bed	21
		4 Bed	5
Total reprovision	**64**		

Table 3 – Proposed housing mix pursuant to the Planning Permission (excluding the 64 re-provided homes)

Tenure Type	**Tenure Mix – Units**	**Unit Mix**	
		Unit Size	**Unit Count**
Affordable Housing	111 (32.6%)	1 Bed	28
		2 Bed	26
		3 Bed	39
		4 Bed	18
Private sales	232 (67.4%)	1 Bed	82
		2 Bed	123
		3 Bed	27
		4 Bed	0
Total	**343**		

4.6 **Redcoat Community Centre and Mosque**

4.6.1 There is an existing community group named Redcoat Community Centre and Mosque (the **RCCM**) who run the existing facility as a mosque and provides wider community educational and women's programmes to the local community.

4.6.2 The new standalone facility is more desirable for the community group as it will make management significantly easier. The previous design pursuant to the 2023 Permission comprised part of a housing complex which meant that there would need to be careful monitoring of noise and users around the building to avoid amenity concerns arising. The intention for the new facility to be used to continue providing existing community activities as well as a wider range of new activities and will provide a clear demarcation of services to the Estate and to the community building. The community group has had a longstanding desire for its own facility and initially submitted its own planning application to develop on the existing land. This opportunity will allow the community group to be part of the wider regeneration Scheme and also obtain a purpose-built facility whilst remaining within the Estate.

4.7 **Phasing**

4.7.1 The Scheme is currently anticipated to be delivered in two phases. The first phase would involve the demolition of the existing Redcoat office which is located in the corner of Stepney Way and Wellesley Street and the removal of the existing pram sheds next to Harriott House. Once those sites are clear, Phase 1 construction would commence and it is anticipated that Phase 1 construction would take approximately 2.5 years to complete.

4.7.2 Phase 2 would involve the demolition of HAP Houses and the remaining construction would commence. It is anticipated that Phase 2 construction would take a further 3 years to complete.

4.7.3 The Council anticipates that the Scheme's construction period will take approximately 5 to 6 years to complete. The construction programme for the Scheme aims to maintain the running of the Redcoat Community Centre while the construction period for Phase 1 takes place. It is envisaged that the RCCM will move in a single decant in Phase 1, to avoid severe disruptions and ensure a normal running of service.

4.7.4 The Council will also move existing residents of HAP Houses in line with the Landlord Offer (**CD 5.2**), which provided for a single decant where possible.

4.7.5 The proposed phasing plan submitted with the application for the Planning Permission is contained at **CD 4.4**.

5 **Social Housing Circumstances in the London Borough of Tower Hamlets**

5.1 Section 7.8 of this Statement sets out the social, economic and environmental benefits arising from the Scheme. This section 5 provides an overview of the need for housing within London and more specifically within the London Borough of Tower Hamlets (the **Borough**) further demonstrating why developments such as the Scheme are essential within the Borough.

5.2 **The London Borough of Tower Hamlets**

5.2.1 The Borough ranks as the 50th (of 317 local authorities) most deprived local authority area at district level based on its rank of Average Rank set out in the Ministry of Housing, Communities & Local Government's English Indices of Multiple Deprivation 2019 (the latest published indices) (the **IOMD**). According to the IOMD, the Borough was the 14th most deprived local authority area based on Income Deprivation Affecting Children and the most deprived area in the country based on Income Deprivation Affecting Older People.

5.2.2 As detailed above, the Estate is within the Stepney Green Ward. According to Greater London Authority analysis of the IOMD, the Stepney Green ward is the 5th most deprived ward in the London Borough of Tower Hamlets (of 20). It was the 69th most deprived ward in London out of 633 based on rank of score, placing it just outside the most deprived 10% of wards in the capital.

5.2.3 In 2024, Tower Hamlets had a median household income of £43,689, according to CACI Paycheck statistics used for setting council rents. This figure was lower than the median income for London, which stood at £44,157, and for Inner London, which was £46,371. Nearly 40,000 residents had household incomes below £30,000, and 16,500 residents had household incomes below £20,000.

5.2.4 In contrast with paragraph 5.2.3, in September 2024 the ONS stated the average house price in Tower Hamlets was £482,000. This is below the London average of £526,000 but nearly twice the national average of £294,000, demonstrating a disparity between the income of residents within the Borough and the price of available affordable housing.

5.2.5 The Office for National Statistics (**ONS**) reports that for the year ending March 2023, 28.3% of Londoners' disposable income was spent on average weekly rent. This makes London the least affordable region in England. In comparison, mortgagors allocated around 17.7% of their disposable income to mortgage costs.

5.2.6 The private rented sector is the predominant type of housing tenure within the Borough, and the 2021 census (the last UK census) recorded that Tower Hamlets population growth was higher than across London with a percentage increase of 22.1% since 2011 compared to London which had a 7.7% increase. In contrast 2021 census also reported that 31.8% of households in the Borough were deprived in one or more of the following areas; housing, education, employment and health. Considering these challenges there is an urgent necessity for the provision of affordable and social housing options to meet the needs of the residents in the Borough.

Tenure	**Percentage of households in Tower Hamlets by tenure**
Private rented	38.2%
Social rented	35.9%
Owns outright or with a mortgage	23.1%
Shared ownership	2.6%
Living rent free	0.2%

(Source: ONS & Census 2021)

5.2.7 In 2024, ONS reported that the annual inflation rate for rents in the private sector within Tower Hamlets saw a significant increase, ranging from 7.2% to 9.9%, depending on the size of the rental unit.

Bedroom size	**2024 Annual rent increase in Tower Hamlets**
One bedroom	9.9%
Two bedrooms	9.2%
Three bedrooms	8.8%
Four or more bedrooms	7.2%

(Source: ONS & Census 2021)

5.2.8 The sharp rise in rent prices has placed Tower Hamlets as the borough with the 8th highest rental rates among all the London Boroughs between October 2022 and September 2023. This surge in rent inflation highlights the increasing cost of living and the growing financial burden on renters in the area. As a result, residents are facing heightened economic pressures and the need for affordable housing solutions is becoming more critical.

5.2.9 The ONS Private Rental Market Statistics shows that the median monthly private sector rents in Tower Hamlets was £2,298 per month between May 2024 to April 2025 rising to £2,364 per month in June 2025. This figure is higher compared to the median rent of £2,252 for London and significantly above the national median of £1,344.

5.2.10 ONS sub-national dwelling stock estimates by tenure for 2018 substantiate the reliance on stock in the private sector from within the Borough with a total of 76,740 dwellings in the private sector. Broken down further, 33,374 (43%) were owner occupied while 43,366 were privately rented. The Borough's reliance on the private sector for the provision of new homes has continued since 2018, with private enterprise responsible for the largest proportion of completed dwellings year-on-year.

5.3 Housing needs in the Borough

5.3.1 There is an urgent need for additional housing across London, and as set out below, particularly within the London Borough of Tower Hamlets.

5.3.2 The Council's Local Plan 2031 (adopted January 2020) (**CD 3.3**) prioritises the provision of housing, especially affordable housing, and includes a key objective of 'managing growth and shaping change'. This includes ensuring that the Council delivers their strategic and local housing needs, in conjunction with effective infrastructure planning and delivery. The Council's current Local Plan has a target of delivering 39,310 new homes by 2025.

5.3.3 The Council's draft new Local Plan (in line with Regulation 19), which went out to consultation between September to October 2024, sets the Borough's housing target as 52,095 new homes to be developed between 2023/2024 to 2038/2039 which translates to an annual target of 3,473 homes. This relates to total net

housing supply. The strategic target is based on Policy H1 (Increasing housing supply) of the London Plan (GLA, 2021) and rolls forward the existing London Plan housing target for the period beyond the London Plan period.

5.3.4 Tower Hamlets currently has just over 21,500 council-owned residential properties and there are more than 45 housing associations working in Tower Hamlets managing over 30,000 homes. However, between March 2023 and April 2024 there were still over 24,000 households on the Council's housing register seeking affordable accommodation within the Borough (Table 4). Within that period, just over 1,200 households were allocated a social housing home, with most households living in a home that they were not satisfied with. By October 2024 the housing demand within the Borough had risen to 25,135 (Table 5) and there is a growing reliance by the Council on expensive private sector properties used for temporary accommodation to account for the lack of available affordable social homes and to prevent homelessness in the Borough. This results in a growing pressure on the Council's general fund budget. It is evident that there is a pressing demand within the Borough for additional housing which meets the needs of the local residents.

5.3.5 In terms of housing numbers, the Borough is the fastest growing borough in London with circa 2,000 new homes of all tenures built each year. As a result of the consistently high delivery of new housing, the Borough accounts for the highest level of 'New Homes Bonus' in the country. However, while the Council is successfully delivering a large number of new homes each year, the demand and need still significantly exceed supply.

5.3.6 The adopted Local Plan (**CD 3.3**), in line with paragraph 63 of the NPPF (**CD 3.1**) targets the delivery of 21,100 new affordable homes over the plan period to meet its future needs, equivalent to an average of 1,407 dwellings per year (45% of the overall need).

5.3.7 Tower Hamlets Local Housing Needs Assessment (October 2023) identified a need of 3,782 affordable homes per year and revealed that the Borough faces a significant overcrowding issue and an urgent need for new housing of all types, including new family homes (with three or more bedrooms). These requirements are evident from housing needs assessments and recent lettings data. Both local and sub-regional housing policies aim to address these needs.

5.3.8 The GLA's Housing in London 2024 evidence base (which is used for the Mayor of London's housing polices) states that in Quarter 1 of 2023/24 there were 17,870 households assessed as being owed a new homelessness prevention or relief duty in London. By the end of March 2024, there were over 65,000 households in temporary accommodation.

5.3.9 Recent figures drawn from the GLA's Common Housing Register (housing waiting list) show that there are 24,639 households registered on the Common Housing Register (CHR) (as of 1 May 2024) of whom:

(a) 2,831 on the CHR (11% of all on the register) are in priority category 1 (being households with a high housing need) and 11,806 (47% of all on the register) in priority category 2 (being households with urgent medical or other urgent needs such as risk of violence or harassment);

(b) 10,932 households (44% of all on the register) are over-crowded; and

(c) 3,075 were placed in temporary accommodation placed by the GLA.

Table 4 Housing Demand 1 April 2023 to 31 March 2024

Bedroom(s) needed	Demand	Allocations	Shortfall
0 bed (bedsit)	0	33	0
1 bed	10,529	510	10,019
2 bed	5,375	416	4,959
3 bed	6,954	211	6,743
4 bed	1,514	47	1,467
5+ bed	147	5	142
Total	24,519	1,222	23,297

(Source: Homeseekers Current Housing Demand & Lets Information)

Table 5 Housing Demand October 2024

Bedroom(s) needed	Demand
1 bed	10,978
2 bed	5,524
3 bed	7,099
4 bed	1,474
5+ bed	141
Total	25,135

(Source: Homeseekers Current Housing Demand & Lets Information)

5.4 The Scheme and meeting housing needs in the London Borough of Tower Hamlets

5.4.1 The above local context (which, though referring to up-to-date source material reflects trends that have been present in the Borough for some time) has been considered by the Council during the development of the Scheme to meet the market and affordable housing needs within the Borough and to support its vision of making Tower Hamlets a well-maintained borough with safer estates providing greater access to affordable housing and an environment where residents can reach their full potential.

5.4.2 Section 6 of this Statement (Planning Position Relevant to the Scheme) sets out how the national planning policy has been strengthened over time to address the

growing need to provide additional homes, including affordable housing, and to emphasise the need to make efficient use of land.

5.4.3 The Order is required to facilitate the Scheme. The Planning Permission in accordance with which the Scheme is intended to be brought forward will result in the number of homes within the Estate increasing from 100 to 407. 64 of those homes will be re-provided homes for existing social rented homes and shared equity homes. Of the remaining 343 homes being provided pursuant to the Planning Permission 111 homes will be affordable housing amounting to 40.5% by habitable room. Please see table 3 above for a breakdown of the homes to be delivered pursuant to the Planning Permission.

5.4.4 As illustrated in Tables 4 and 5 above, the greatest demand within the Borough is for 1 bed, 2 bed and 3 bed properties. The schedule of accommodation for the Scheme is set out in section 4.5 of this Statement. As detailed, the Scheme seeks to provide predominantly 1 bed, 2 bed and 3 bed properties thus assisting the Council with meeting the urgent need for an increased number of family sized units within the Borough. The Scheme will also deliver a small number of 4-bedroom properties for the purposes of affordable housing and existing residents of HAP Houses. These units will therefore make a significant contribution to meeting housing needs in Tower Hamlets.

5.4.5 Section 7.8 outlines the anticipated social, economic, and environmental benefits of the Scheme. The redevelopment of HAP Houses will also secure a number of public benefits, including:

(a) increasing the supply of good quality affordable housing to meet the acute need in the Borough;

(b) increasing the supply of market housing to meet the significant identified requirement;

(c) improving the aesthetics of the area to make residents proud of where they live;

(d) providing local economic investment, including job and training opportunities; and

(e) improving public realm.

5.5 Social Housing Circumstances - Conclusion

5.5.1 Taking into account various data sources regarding housing demand and supply across the Borough, the following conclusions have been drawn:

(a) Tower Hamlets remains a borough of high housing need;

(b) there is a sustained increase of net migration into the Borough;

(c) the Borough needs to deliver a significant number of homes and affordable homes each year to meet housing need; and

(d) a significant percentage of those homes must have two or three bedrooms to meet demand from over-crowded households.

5.5.2 The social and housing circumstances described in this Statement demonstrates the need for the Scheme and why there is a compelling case in the public interest for using powers of compulsory acquisition to support the delivery of the Scheme.

5.5.3 The Order will facilitate the redevelopment and improvement of the Order Land to provide 407 residential units across buildings ranging in height from 4-8 storeys and community centre building, together with associated landscaped communal amenity space, accessible car parking, secure cycle parking spaces and refuse/recycling storage facilities. Together, these homes will address the critical housing need in the borough and the need for regeneration, and positively impact upon the economic, social and environmental wellbeing of all residents living in the local area.

6 Planning Position Relevant to the Scheme

6.1 On 12 June 2024 the Council's Development Committee resolved to grant the Planning Permission (**CD 2.5**) and the Planning Permission decision notice was subsequently issued on 27 June 2025 (**CD 4.2**). In assessing the Planning Application and making its resolution, the Council's Development Committee had regard to local and national planning policy. It is, therefore, evident that the Council considers that the proposals for the Scheme are supported by planning policy at national, regional, and local level and that there are no planning impediments to the Scheme coming forward.

6.2 The Scheme is consistent with policy objectives of the NPPF (**CD 3.1**), the London Plan (2021) (**CD 3.2**) and the Council's Local Plan (adopted on 15 January 2020) (**CD 3.3**). The Scheme presents an opportunity for redevelopment to create a landmark development, creating a sense of identity, providing modern homes and community facilities. The various relevant policies, and the extent to which the Scheme complies with them, were set out in the Committee Report for the Planning Permission and summarised below.

National Planning Policy Framework

6.3 The NPPF sets out the Government's policies on planning and how these are expected to be applied (**CD 3.1**). The NPPF makes it clear that the purpose of the planning system is to contribute to the achievement of sustainable development. The NPPF sets out three dimensions to sustainable development:

6.3.1 Economic – helping to build a strong economy by ensuring that enough of the right type of land is available in the right places;

6.3.2 Social – supporting communities by ensuring that a sufficient number and range of homes can be provided and fostering a well-designed and safe built environment; and

6.3.3 Environmental – protecting and enhancing the environment by making effective use of land, helping to improve biodiversity, using natural resources prudently and minimising waste and pollution.

6.4 The NPPF makes is clear that which local planning authorities should seek opportunities to achieve the promotion of these dimensions (**CD 3.1**).

6.4.1 In decision making, this means approving development proposals that accord with an up-to-date development plan (paragraph 11).

6.4.2 Chapter 5 of the NPPF promotes increases and improvements in the quantity, quality and variety of housing, with paragraph 61 noting the Government's support for schemes that significantly boost the supply of housing, including affordable housing. Paragraph 63 provides that dwellings should be delivered in a variety of sizes, types and tenures to meet the broad needs of different groups in the community.

6.4.3 As regards design, Chapter 12 of the NPPF states that achieving well-designed places is a key purpose of the planning system. In addition, paragraph 135 cites functionality, attractiveness and responsiveness to local context as important principles in the design of developments and highlights that developments should promote accessibility.

6.4.4 Chapter 8 of the NPPF promotes the creation of healthy and safe communities. This is expressed in paragraph 98, which emphasizes the importance of creating high quality open space where people can meet and interact. Paragraph 103 of the NPPF builds on this, promoting the importance of a high quality network of open spaces which provide opportunities for physical activity and social interaction.

6.4.5 Paragraph 98 of the NPPF also highlights the planning system's role in supplying the social, recreation and cultural facilities and services that are crucial in meeting community needs. The importance of safeguarding existing valued facilities and the need to ensure residential economic and community uses are integrated within new developments is noted. Paragraphs 104 and 105 resist the loss of recreation spaces and require new developments to incorporate both private and public open spaces for use by occupants.

6.4.6 Paragraph 126 encourages local planning authorities to take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, supported by compulsory purchase powers in appropriate cases.

6.5 Increasing housing supply is a fundamental policy objective within the NPPF (**CD 3.1**). The Scheme is consistent with sustainable development principles of the NPPF in terms of the emphasis on urban regeneration and the efficient re-use of brownfield land in order to create sustainable development in line with economic, social and environmental objectives to improve people's quality of life. The existing use of the Estate is predominantly as residential and, as such, the principle of residential use has been established. The proposed re-provision of the existing social rented homes and the shared equity homes on the Estate and the provision of 40.5%, by habitable room of the remaining 343 homes will be affordable, is in accordance with the NPPF and should be given substantial weight.

6.6 Local planning authorities are also expected to support the Government's objective of significantly boosting the supply of homes across all housing tenures to meet objectively assessed needs and demands. The current Government has a target of building 1.5m new

homes within this Parliament, and since taking office has made clear that accelerating housing delivery is a key priority.

6.7 The emphasis on community involvement; creating a sustainable community in a high quality, safe and healthy local environment where people want to live; contributing to the promotion of urban renaissance and improvement of quality of life and access to jobs; building a socially inclusive community with a mix of housing are all in line with the NPPF aims of sustainable development.

London Plan (2021)

6.8 The Mayor of London's revised London Plan was formally adopted in March 2021 (**CD 3.2**). It provides a strategic spatial strategy within Greater London and forms part of the Council's development plan. The London Plan sets out a number of objectives:

6.8.1 Building strong and inclusive communities;

6.8.2 Making the best use of land;

6.8.3 Creating a healthy city;

6.8.4 Delivering the homes Londoners need;

6.8.5 Growing a good economy; and

6.8.6 Increasing efficiency and resilience.

6.9 Where a development scheme proposes the demolition of an existing estate, Policy H8 (**CD 3.2**) requires that alternatives to demolition have first been considered. As set out in section 7.11 of this Statement and in the 2024 Committee Report (**CD 2.5**), HAP Houses faces considerable issues, including damp and overcrowding and poor-quality amenity space. These are issues which are better dealt with by the demolition and provision of a high-quality residential development which re-provides homes to modern standards. The Council considered an infill scheme as an alternative to full regeneration. Both options were communicated to residents during the consultation process and residents voted overwhelmingly for redevelopment, as set out in sections 8.3 and 8.4 of this Statement. As part of the Planning Application process, the Council's Development Committee also concluded that the Scheme authorised by the Planning Permission would provide the maximum reasonable amount of affordable housing in line with London Plan Policy H8 (**CD 3.2**) and would increase affordable housing provision within the Estate.

6.10 London Plan Policy GG2(c) (**CD 3.2**) requires those involved in planning and development to explore the potential to intensify the use of land to support additional homes, particular in locations that are well connected to jobs, services, infrastructure and amenities. Policy H1 (**CD 3.2**) sets the ten year net housing completion target for Tower Hamlets at 34,730 units by 2028/29. The Scheme, developed in accordance with the Planning Permission, will result in 307 new homes (excluding the 100 pre-existing homes) within the Estate which will make a meaningful contribution towards the Council's target.

6.11 Where a development results in a loss of existing housing, Policy H8 (**CD 3.2**) requires that the lost housing is replaced by new housing at existing or higher densities. This policy also requires that where a proposal will result in the demolition of affordable housing, the

development should seek to re-provide the housing to be demolished as well as provide an uplift in affordable housing where possible. As set out in this Statement, 36 secure tenant homes and 28 resident leaseholder homes will be re-provided and of the 343 remaining homes being provided, 40.5% (by habitable room) will be affordable homes.

6.12 London Plan Policy H10 (**CD 3.2**) requires developments to secure a range of unit sizes. As set out in section 4.5 of this Statement, the Scheme will result in a mixture of 1-bed, 2-bed, 3-bed and 4-bed homes with 63% of family sized homes within the affordable rented tenure and 56% in the intermediate tenure in compliance with this policy. Of the homes to be provided, London Plan Policy D6 (**CD 3.2**) requires any new dwellings to meet specified internal space standards. As set out in the Planning Application documents, the proposed unit sizes will meet these standards. Policy D6 (**CD 3.2**) also includes a requirement to maximise dual aspect dwellings and ensuring the provision of sufficient daylight and sunlight to new dwellings. Of the proposed units, 67% will be dual aspect.

6.13 The Scheme will involve the demolition of the existing community buildings being the Redcoat Centre and Redcoat Community Centre (mosque) consisting of approximately 1,120sqm floorspace. The regeneration will then involve the reprovision of these facilities in the form of a new standalone community space comprising 1,167sqm which will result in a slight uplift of floorspace. This accords with London Plan Policy S1 (**CD 3.2**), which supports schemes which protect, maintain and enhance existing community facilitates and sets out a presumption against the loss of community facilities.

6.14 As such, it is evident that the Scheme will play a key role in achieving the objectives under the London Plan.

The Local Plan

6.15 Local Plan Policies S.CF1 and D.CF2 (**CD 3.3**) require social infrastructure to be retained, protected, and maintained unless a replacement facility of similar nature that would better meet the needs of existing users is provided. As set out in section 4.6 of this Statement, the RCCM has had a longstanding desire for its own facility and this opportunity will allow them to be part of the wider regeneration scheme whilst also receiving a purpose-built facility.

6.16 Local Plan Policy D.H2 part 5 provides the following criteria for estate regeneration schemes to follow:

6.16.1 Protect and enhance existing open space and community facilities;

6.16.2 Protect the existing quantum of affordable and family units, with affordable units re-provided with the same or equivalent rent levels;

6.16.3 Provide an uplift in the number of affordable homes; and

6.16.4 Include plans for refurbishment of any existing homes to the latest decent homes standard.

6.17 As set out above, the Scheme will result in the re-provision of community facilities and in addition to the 64 homes to be re-provided will result in 343 homes of which 40.5% (by habitable room) will be affordable and with 63% of family sized homes within the affordable rented tenure and 56% in the intermediate tenure in compliance with this policy. The Scheme evidently supports the objectives of Policy D.H2 Part 5 of the Local Plan.

6.18 The Scheme will secure 34 wheelchair accessible dwellings of which 24 will be within the affordable rented sector and 10 within the private units. The provision of 34 wheelchair accessible dwellings will constitute 10% of the additional homes to be provided in accordance with Local Plan Policy D.H3 (and London Plan Policy D7) (**CD 3.2**) which requires residential developments to provide at least 10% of the proposed dwellings as dwellings which meet Building Regulation M4(3) 'wheelchair accessible dwellings' and the remainder of dwellings to meet M4(2) 'accessible and adaptable dwellings'.

Other relevant Policy and Guidance

6.19 The Mayor of London's Housing Supplementary Planning Guidance (March 2016, updated August 2017) (**CD 3.7**) provides guidance on a range of London Plan policies including housing supply, residential density, housing standards and viability appraisals. The guidance states the overarching objectives for any estate regeneration scheme will usually be to:

6.19.1 Deliver safe and better quality homes for local people;

6.19.2 Increase the overall supply of new and affordable homes; and

6.19.3 Improve the quality of the local environment through a better public realm and provision of social infrastructure (e.g. schools, parks, or community centres).

6.20 The Mayor's 'Good Practice Guide to Estate Regeneration' (the **GPGER**) (**CD 3.6**) provides detailed guidance for assessing approaches to estate regeneration. The GPGER requires all estate regeneration schemes to provide an increase in affordable housing, full rights to return or remain for social tenants and a fair compensation deal for leaseholders and freeholders. There are 36 existing Secure Tenants within HAP Houses with a right to return. As was set out in the Committee Report in respect of the Planning Application, all 36 homes will be re-provided for these Secure Tenants on a like for like basis so these tenants may continue to be tenants of the Council with their existing tenancy rights with any rights to buy and succession rights retained. There are also 28 resident leaseholder properties which will, in accordance with the GPGER, be re-provided. Of the remaining 343 homes being developed as part of the Scheme, 111 affordable homes are being provided which equates to 40.5% (by habitable room) thus further meeting the objectives of the GPGER.

6.21 The GPGER also puts great emphasis on early consultation and engagement with residents. As set out in section 8 of this Statement, the Council has sought to engage and consult with Estate residents throughout the life of the Scheme.

6.22 For the reasons set out in the sections above, the Scheme evidently complies with these requirements.

Conclusions

6.23 The Scheme benefits from strong policy support at national, regional and local level. It is proposed to be delivered by implementation of the Planning Permission. Although the Planning Permission was granted subject to conditions none of these are onerous or unusual and there is no reason to believe they will not be satisfied in the course of development in the usual way. There are therefore no known planning impediments to the delivery of the Scheme.

7 Justification for the use of CPO powers

7.1 Acquisition of the Order Land is necessary in order to deliver the Scheme.

7.2 If the relevant interests are not able to be acquired, the Scheme would be severely compromised as the units to be acquired lie within the main development area of the Planning Permission. A new planning application and permission would be required, which there would be no certainty of being achieved given the compromised area available for redevelopment. The same scale of benefits would be unlikely to be achievable, and certainly not within the timescales currently proposed.

7.3 In accordance with paragraph 2 and paragraph 12 of the Guidance acquiring authorities should use compulsory purchase powers where:

7.3.1 it is expedient to do so;

7.3.2 there is a compelling case in the public interest for doing so;

7.3.3 reasonable efforts have first been made to negotiate the purchase of the land by agreement; and

7.3.4 the acquiring authority is sure that the purposes for which it is making a compulsory purchase order sufficiently justify interfering with the human rights of those with an interest in the land affected. Regard should be had, in particular, to the provisions of Article 1 of the First Protocol to the European Convention on Human Rights and, in the case of a dwelling, Article 8 of the Convention Acquiring authorities should also give consideration to the public sector equality duty.

7.4 In accordance with paragraph 12 and 13 of the Guidance, the overarching consideration for the Secretary of State in deciding whether an Order should be confirmed is whether the acquiring authority has been able to demonstrate the matters listed at section 7.3 above and that they have taken reasonable steps to:

7.4.1 understand the impact of the exercise of the compulsory purchase powers included in the compulsory purchase order on those with an interest in the land, for example affected owners and occupiers, through direct engagement with those parties;

7.4.2 attempt the acquisition of all land and rights included in the compulsory purchase order by agreement;

7.4.3 that there are sufficiently compelling reasons for the compulsory powers to be sought at this time; and

7.4.4 formulate a clear idea of how it intends to use the land which it is proposing to acquire and show that all the necessary resources are likely to be available to achieve that end within a reasonable time scale.

7.5 In the context of that overarching consideration, having regard to paragraphs 109 and 110 of the Guidance, the following issues should be considered:

7.5.1 whether the purpose for which the land is being acquired fits with the adopted planning framework for that area;

7.5.2 the extent to which the proposed redevelopment of the Estate would contribute to the achievement of the promotion and/or improvement of the economic, and/or social, and/or environmental well-being of the Council's area;

7.5.3 the potential financial viability of the proposal to redevelop HAP Houses, general funding intentions and the timing of available funding;

7.5.4 planning or other impediments to implementation of the proposed regeneration and whether that regeneration has a reasonable prospect of going ahead; and

7.5.5 whether the purposes for which the proposed Order Land is to be acquired could reasonably be achieved by any other means within a reasonable timeframe.

7.6 The issues summarised above are addressed below.

7.7 **Whether the purpose for which the land is being acquired fits with the adopted planning framework for the area**

7.7.1 The regeneration is supported in a variety of policy documents, namely the London Plan (**CD 3.2**), the Council's Local Plan (**CD 3.3**) and the National Planning Policy Framework (**CD 3.1**), as well as relevant guidance documents. This is evidenced in section 6.

7.7.2 As set out in section 6 above, in assessing the Planning Application, the Council's Development Committee had regard to local and national planning policy. On 12 June 2024 the Development Committee resolved to grant the Planning Permission (**CD 2.5**) and the decision notice was subsequently issued in June 2025 (**CD 4.2**). The Planning Application was not advertised as a departure from the development plan. The Council therefore considers that the proposals for the Scheme are supported by planning policy at national, regional, and local level.

7.7.3 The Council is therefore satisfied that the promotion of the Order is in accordance with the strategic objectives of the adopted planning framework.

7.8 **Contribution to the social, economic and environmental well-being of the area**

7.8.1 Section 226(1A) of the 1990 Act (**CD 7.1**) directs that an acquiring authority may not exercise the powers under this section unless it thinks that the proposed development, redevelopment or improvement is likely to contribute to the economic, social or environmental well-being of the area for which the GLA has administrative responsibility.

Social Benefits

7.8.2 The current housing results in an ineffective use of the Estate. The existing blocks are poorly organised on the Estate with a significant amount of green areas that have little practical value to residents (and the general locality). There is an opportunity to replace relatively low-density, poor-quality housing with a higher density of high-quality homes and to deliver more homes for families. Significant improvements can also be made to the living environment for residents and to the public realm. The Scheme will also be an opportunity for qualifying adult children of existing residents who are on the housing register to be re-housed in

the new development at the same time as their parents. This offer is open to all secure tenants and resident leaseholders and applicable to one member per household.

7.8.3 The main social benefits for the Scheme to be delivered pursuant to the Planning Permission will include:

(a) the provision of 36 replacement social rent homes for existing tenants together with 111 GLA funded social rent homes (which includes 22 homes to be provided for qualifying adult children of secure tenants and resident leaseholders). There may be additional affordable homes provided following viability reviews secured through the planning process;

(b) homes for shared equity sale to enable existing resident leaseholders to remain within the Estate;

(c) 63% of the homes within the affordable rented tenure will be family size;

(d) 10% of additional homes will be wheelchair accessible with 24 of these homes being provided within the affordable tenure;

(e) 232 market homes to cross subsidise the affordable housing provision, support housing delivery and provide diversity of tenure;

(f) improved living condition and health and wellbeing options as a result of the improved housing quality and condition;

(g) a new and improved community centre / mosque;

(h) increased numbers of cycle parking on the Estate;

(i) all homes within the redeveloped Estate will meet modern living standards; and

(j) increased local population growth, which could provide local economic growth and local infrastructure and amenity improvements.

7.8.4 Of the total 407 new homes being developed (as per the Planning Permission), 64 of these are being re-provided to existing resident leaseholders and of the 343 remaining homes, of which 232 (668 habitable rooms) are private and 111 (440 habitable rooms) affordable.

Economic Benefits

7.8.5 The Scheme will contribute to economic growth during the construction period.

7.8.6 Construction and new development opportunities create a range of employment opportunities within local and wider economy and has been acknowledged by the Government as a key driver for boosting housing delivery as required by the NPPF (**CD 3.1**). Construction of the Scheme will support jobs directly on the Estate during the development phase as well as indirectly by supporting additional jobs in the supply chain.

7.8.7 The Scheme will also contribute to the economic role of sustainable development by delivering land to improve choice and competition in the residential marketplace. The Council will seek to secure employment and training opportunities targeted at local people to ensure residents of the borough have the chance to benefit from the employment the Scheme will deliver.

7.8.8 The economic benefits of the Scheme will be:

(a) delivery of new homes to support growth;

(b) the payment of approximately £2,134,597.25 by way of Tower Hamlets Community Infrastructure Levy (**CIL**) and £867,398.94 by way of Mayor of London CIL;

(c) financial contributions, including £190,632 towards construction phase employment skills training. The creation of construction jobs during the construction period which will span over 5 to 6 years and related employment opportunities;

(d) delivery of land to improve choice and competition in the residential marketplace;

(e) the procurement process will focus on securing employment and training opportunities targeted at local residents and condition 17 of the Planning Permission (**CD 4.2**) requires that the following will be secured:

i 20% local procurement during the construction phase;

ii 20% local labour in the construction phase;

iii 29 construction phase apprenticeships;

(f) reduction in damp related costs as a result of the refurbishment and redevelopment to improve the condition of the units. This could reduce associated NHS and societal costs related to illness caused by damp condition in poor quality housing. Solving these issues nationally is estimated to provide savings to the NHS of £30-40 million and to society of £90-100 million per annum (*BRE's 'The Cost of Poor Housing in England' Briefing Paper*); and

(g) New Homes Bonus received by the local council following the creation of new units through redevelopment, based on the amount of extra council tax revenue raised for new-build homes.

7.8.9 According to the IOMD, Stepney Green ward is the 6th most deprived in the Council's Borough based on Income rank (within the most deprived 1% of wards) and the 69th most deprived in London of 633. It was 6th most deprived ward in Tower Hamlets based on Employment rank and the 94th most deprived in London Construction. Consequently, the provision of the above benefits resulting from the Scheme are of particular importance for the Council.

Environmental Benefits

7.8.10 The redevelopment of the Estate will remove the existing poor-quality buildings, extensive hard surfacing and under-utilised land around the Order Land and will provide new buildings of high-quality design which are more sustainable than the existing buildings on the Estate.

7.8.11 The proposals include extensive improvements to the public realm, improving the local environment for residents. The proposals seek to introduce a variety of soft landscaping areas to the Estate comprising communal garden spaces located in the courtyard areas and a centrally located new square which will deliver ecological and environmental benefits to the Estate and surrounding area.

7.8.12 The new homes are being designed to meet the planning policy requirements for sustainability, aiming to achieve an estimated site-wide CO2 emission reduction of at least 45% over the Target Emission Rate using the SAP 10 emission factors, through a combination of energy conservation measures, renewable heat, and electricity generation technologies, such as photovoltaic solar panels and air source heat pumps.

7.8.13 The new homes will be built to modern standards which will aim to promote biodiversity. For example, current proposals are for new buildings to have green roofs to encourage biodiversity.

7.8.14 The Scheme is assisting in delivering the Council's Local Plan targets for delivery of affordable homes, place making, decarbonising our housing stock, and providing homes that meet high sustainability standards.

7.8.15 Promotion or improvement of environmental well-being will also occur through the following main environmental benefits:

(a) There will be scope for play with new play equipment targeted to 0–5 year age range;

(b) Provision of multigenerational spaces such as the allotments in the courtyards to be allocated to households to allow them to grow their own fresh produce;

(c) The new buildings will have green roofs to encourage biodiversity;

(d) The new homes will be built to modern standards, in line with the Council's Local Plan targets for delivery of affordable homes, homes that meet high sustainability standards and decarbonising the housing stock;

(e) The current housing on the Estate is inefficient and suffers from poor thermal and acoustic insulation in comparison to current building regulation requirements resulting in a higher fuel costs. The proposed development's energy strategy is energy efficient and would meet the zero-carbon benchmarks of the London Plan and the Council's Local Plan;

(f) Increased numbers of cycle parking on the Estate; and

(g) The overall drainage strategy for the proposed development is based on the use of sustainable drainage systems that would effectively manage the surface water run-off without increasing the risk of flooding elsewhere.

7.9 **Viability of the regeneration and general indication of funding intentions**

7.9.1 As set out in section 4.3, the Council considers that funding will be available for each stage of the development of the Scheme and does not envisage any financial impediments to the Scheme being progressed. Funding for anticipated land assembly costs, land acquisition settlements, design and planning fees, fees associated with procurement and legal activities as well as full delivery of the first phase of development which primarily includes the proposed replacement homes is available now.

7.10 **Reasonable prospect of Scheme proceeding: implementation of the Scheme**

7.10.1 A summary of the potential impediments to the regeneration of the Estate are set out below. Save as referred to below, the Council does not consider there to be any significant planning, resourcing (including financial), legal or other impediments.

7.10.2 **Securing vacant possession**: the Order, once made and confirmed will remove impediments to acquiring all necessary land interests in the Order Land to progress the Scheme. Tenant interests will be terminated via the normal Landlord Tenant Act 1985 route. The time frames for securing vacant possession of tenant interests are being factored into the wider programme for the regeneration of the Estate.

7.10.3 **Planning**: as set out in section 4.4 of this Statement, the Development Committee resolved to grant the Planning Permission for the Scheme on 12 June 2024 (**CD 2.5**) and the decision notice was issued on 27 June 2025 (**CD 4.2**). The Council does not envisage any impediments to discharging the conditions attached to the Planning Permission or any planning obligations.

7.10.4 **Existing rights**: on 31 January 2024 Cabinet granted approval for the Council to affect the appropriation the Estate for planning purposes (**CD 2.4**). Cabinet agreed on 16 October 2024 that the Council may rely on powers of appropriation (**CD 2.6**), subject to the Secretary of State's consent (which was subsequently given on 29 October 2024 (**CD 2.7**)). The appropriation will allow the Council to interfere with existing rights which may be affected as a result of the Scheme. This facilitates the progression of the Scheme and assists with avoiding any delays which may have resulted through an injunction sought by someone with a right in or over the Estate.

7.10.5 **Stopping up order**: a section of adopted highway to the northwest of the Order Land will be required to be stopped up and, as the land is unregistered, acquired through the CPO. The land subject to this proposed stopping up order is a small portion of public footpath on the junction of Stepney Way and Jamaica Street and is deemed to be surplus to public access requirements given the remainder of the footway follows a consistent linear path. The Council is progressing the stopping up order with the highways team. The area to be stopped up is shown on the Stopping Up Plan at **CD 5.9**. The Council is progressing the order and

does not envisage any reason why such an order would not be forthcoming within a reasonable time period. In addition, the redevelopment will provide substantial public realm improvements and denotes additional land for public highway use.

7.10.6 **Financial risks**: financial risks may arise if the project costs exceed those projected. This is more likely to occur where there are delays to the development programme. As set out at section 4.3 of this Statement, Cabinet approved a budget of £2 million to deliver the design and consultation stage in July 2019 and which was increased to approximately £2.8 million in November 2021 (**CD 2.2**). In December 2021 Cabinet approved a budget of a further £86 million for the first three years of the Scheme to include (but not limited to) costs related to land assembly, design and planning, procurement and legal activities (**CD 2.3**).

7.10.7 Further funds were awarded by Cabinet in February 2025 and which are sufficient to meet all costs to date and will also cover all land assembly costs as well as the cost of delivering the replacement homes in Phase 1. A further budget for the Scheme is anticipated to be taken to Cabinet in 2026 The Council does not consider there to be any reason that the budget will not be approved, and current forecasts are based on detailed cost estimates from the Council's external quantity surveyor. The intention is for the remaining balance of funding for the Scheme to be provided by the development partner. As such it is not envisaged that there will be any significant financial impediments to the Scheme progressing.

7.10.8 The Council has now awarded Countryside the first stage contract under a Pre-Construction Services Agreement. The Council, therefore, now has a development partner to facilitate the delivery of the Scheme, with signature of the development agreement being expected in early 2026.

7.10.9 The Council's investigations have revealed no other legal, financial or physical impediment and the Council is confident that there is a more than reasonable prospect of the Scheme proceeding.

7.11 **Whether the purpose for which the acquiring authority is proposing to acquire the land could be achieved by other means**

7.11.1 The Order Land consists of buildings which are outdated and inefficient and housing which has considerable issues. As set out in the 2024 Committee Report (**CD 2.5)** these issues include damp, overcrowding and poor-quality amenity space. The current HAP Houses are consequently not suitable for modern day living. In particular, the housing suffers from:

(a) poor thermal and acoustic insulation in comparison to current building regulation requirements resulting in a higher fuel costs;

(b) poor quality public realm including inadequate refuse disposal and collection facilities and poor-quality external amenity provision; and

(c) inadequate security to the area leaves individual homes vulnerable to anti-social behaviour and low-level crimes.

7.11.2 The Council has sought to acquire the Order Land by negotiation. An overview of the efforts and negotiations that have taken place with a view to acquiring the required land and rights are set out at section 8 of this Statement. Despite the efforts and progress made to date, the Council has not been able to come to an agreement with all leaseholders. Whilst the Council will continue to negotiate with individual land interests, it is evident that the absence of the Order to support the Scheme could have negative impacts on the deliverability of the Scheme, including:

(a) Risk to land assembly, jeopardising or delaying delivery of the Scheme. Any such delays may also lead to higher delivery costs which in turn may impact the viability of the Scheme;

(b) Ability of just one or more individual leaseholder to delay or prevent the Scheme;

(c) Uncertainty for leaseholders and their tenants as to whether the Scheme will progress; and

(d) Unfairness to those leaseholders who have already sold their property to the Council in accordance with the Landlord Offer (**CD 5.2**) on the understanding that their property would otherwise be subject to the proposed Order.

7.11.3 Consideration was given to the potential to refurbish the existing buildings. However, the refurbishment option would only result in the improvement to housing already on the Estate and of that housing it was only the 36 socially rented homes and communal areas within the Council's control which could be refurbished, leaving the other 64 dwellings and the Community Centre and Mosque in their pre-existing state. It was also considered that refurbishment could not adequately deal with the issues faced by the current housing stock (detailed at section 7.11.1) above.

7.11.4 Further, refurbishing the pre-existing housing would not result in any uplift in the number of homes which could, if making proper use of the space on the Estate, be provided and would fail to provide housing of the right number of bedrooms and sizes to meet the current demands within the Estate and resolve concerns of overcrowding.

7.11.5 Consequently, refurbishment was considered an impractical and inefficient option to seek to repair and improve the Estate if the Scheme benefits as set out in section 7.8 are to be realised and delivered.

7.11.6 The Council is supportive of the demolition and redevelopment process under the Scheme in order to provide homes to modern standards by delivery high quality residential development, an improved community space and an increased affordable and market housing provision.

7.11.7 In order to carry out the Scheme, the Council requires unencumbered ownership with vacant possession of all the property interests which will form part of the Scheme. There is otherwise a potential risk that affected interest holders could

bring proceedings which could stop construction of the project or significantly delay its delivery.

7.11.8 The Council has made considerable efforts to acquire all land interests on the site by agreement but the prospects of acquisition of all interests in the Order Land by agreement within a reasonable timescale are unlikely.

7.12 In summary, the Council does not consider that these issues can be addressed through refurbishment of the Estate or by piecemeal regeneration and, having regard to the nature of the proposals and the advice set out in the Guidance, the Council is satisfied that there is a compelling case in the public interest for the making of the Order and that, if confirmed, the Order would strike an appropriate balance between public and private interests and that the development will make a significant contribution to the environmental, social and economic well-being of its area, as well as the borough generally, meeting the objects of section 226(1)(a) of the 1990 Act.

8 Consultation and Engagement

8.1 In July 2019, the Council started to talk to residents of HAP Houses, the communities utilising the RCCM and other stakeholders about the potential to regenerate the Estate. The first stage of the consultation took place before the Residents' Ballot. A summary of this first stage is as follows:

(a) An introduction letter and invitation to the initial drop-in events at Stepney City Farm was provided to residents (**CD 5.1**);

(b) Producing and distributing newsletters to summarise the latest design proposals, resident attendance at consultations, feedback on the scheme and an updated timeline. In total, six newsletters were distributed with further newsletters planning in the future;

(c) Creation of the LBTH 'Lets Talk' website to provide information on the scheme and relevant background materials including links to planning and cabinet decisions and Landlord Offer (**CD 5.2**) documents and encourage feedback. The websites also included video presentations;

(d) The Tower Hamlets community bus was used by the project team in a central location on the estate with two officers onboard from 10am – 4pm each Tuesday and Thursday to provide assistance to residents;

(e) All communications throughout the consultation included details on how to access translation resources, and officers who speak Bengali were available at each event;

(f) A resident's panel was convened, including both leaseholders and tenants, to meet with the officers from the Council and to take part in the appointment of an Independent Tenant and Leaseholder Association;

(g) Engaging an independent service to administer the Resident's Ballot, including the management of confidential data, writing to households to explain their role, and providing information regarding the options to vote;

(h) A draft re-housing guide was circulated to residents of HAP Houses in November 2019. This was shared in draft so that residents could provide their views on the contents of the guide including whether there were details they considered would be helpful to be included.

8.2 The Landlord Offer (**CD 5.2**) was presented to residents of the Estate in February 2020 prior to the opening of the Resident's Ballot. The following promises were made to residents:

(a) We will keep the community together;

(b) More council homes for social rent;

(c) Reduced crime and anti-social behaviour through better design;

(d) New homes at social rents for all existing council tenants;

(e) Options to suit every resident leaseholder;

(f) Addressing overcrowding on the estate through the provision of new affordable homes;

(g) One move to a new home, wherever possible;

(h) Financial compensation and all reasonable moving costs paid;

(i) Current street parking permits guaranteed;

(j) Residents' Panel representing residents in decision making and shaping the future of their estate; and

(k) Door-to-door moving support for older and vulnerable residents.

8.3 A Residents' Ballot was subsequently held between 18 March and 9 April 2020. There was a 95% turnout (of the 100 existing households and the RCCM) and over 90% of those present voted in favour of redevelopment. As part of a comprehensive consultation process, local residents and stakeholders have contributed to the vision for the future development and the emerging design proposals.

8.4 During consultation events, the Council explained the alternative of an 'infill scheme' versus a full regeneration. The Council's website for the Scheme was updated during the consultation process, before and after the Residents' Ballot, to publicise details of infill and regeneration as potential options. It included bullet-point lists to explain the impacts for residents, as well as graphics to help residents visualise both options. A note on the alternatives considered was included on pages 9-10 of the Landlord's Offer (**CD 5.2**) and the Council's website for the Scheme.

8.5 The second stage of consultation took place post-Resident's Ballot:

(a) In September 2020, invitations and print-outs of the agenda for the online design consultation meetings were distributed to residents;

(b) Newsletters were distributed to residents and included the evolution of the design, updated timelines and project officers' details. A newsletter in

respect of the overall scheme was also distributed in the wider Stepney area;

(c) The website was updated to include the designs submitted as part of the planning application. The website was also updated to set out the revised scheme in relation to the Mosque;

(d) In August 2021, a consultation took place to engage with families and children in respect of play equipment and landscape design;

(e) The project team distributed invites and conducted a door-knocking exercise to invite all residents to the final estate-wide consultation ahead of the planning submission. A booklet was produced to provide information regarding the provision of housing for resident leaseholders (**CD 5.5**).

8.6 Following submission of the application for the 2023 Permission, two consultation events were carried out on 3 and 5 February 2022 and a further two consultation events took place on 22 and 24 June 2023.

8.7 In July 2023 a new administration took over leadership of the Council. The new administration instructed that the scheme should be redesigned to change the location of the RCCM to become a standalone facility.

8.8 Throughout the period between the February 2022 consultations and the new administration in 2023, dialogue with the Resident Panel was maintained. Regular update meetings were held to provide information to residents and to answer any questions they had on scheme proposals and the Landlord Offer and then the subsequent impact of the Building Safety Act, announced in July 2023.

8.9 Further newsletters were issued to the Estate providing an update on the proposed regeneration in December 2022, April 2022 and December 2023.

8.10 The Council commenced the buyback programme in June 2023 and has been in active negotiations with leaseholders who have a relevant land interest in the Estate. In summary:

(a) In February 2020 all leaseholders in the Order Land received or had access to the homeowners guidance brochure which is a guide detailing the compulsory purchase process and the options available to both resident and non-resident leaseholders on the Estate;

(b) In March 2023 a letter was issued to all residential and non-residential leaseholders within HAP Houses providing an overview of the process of selling properties back to the Council and included comprehensive guides on compulsory purchase and a guide to compensation entitlements;

(c) In June 2023 a letter was issued to leaseholders informing them that the Council was ready and able to purchase those properties which leaseholders wished to sell and invited leaseholders to seek a valuation of their properties if they so wished. This correspondence reiterated the shared equity scheme available to resident leaseholders should they wish to discuss this with the Council;

(d) In November 2023 a further letter was issued to those leaseholders who had not yet engaged with the Council offering a further opportunity to discuss their situation with the Council and offering a further opportunity to book a valuation of their property;

(e) In April 2024 two drop-in sessions were held on the Estate for all leaseholders and tenants to attend and discuss the Order and the Council's buyback programme. These sessions were advertised by the Council by way of letters, posters and door knocking exercise;

(f) In August 2024 a further letter was issued to those leaseholders who had not yet responded to earlier correspondence or with whom discussions had fallen silent. This letter informed these leaseholders that the Council was pursuing a compulsory purchase order and encouraging them to correspond with the Council;

(g) HAP Resident Panel meetings are held with Council officers, independent tenants and leaseholders advisor (**ITLA**) every 3-4 months to provide progress updates on the Scheme;

(h) A HAP Newsletter continues to be issued every 3-4 months which provides updates on the Scheme, including decant and leaseholder buyback details. Three newsletters have been issued so far in 2025 with the latest being in August 2025;

(i) The LBTH ‘Lets Talk’ website is kept up to date with progression of the Scheme; and

(j) The Council also holds design consultation events and events for residents to meet, for example, the developer team and the buyback team;

8.11 The Council also published in May 2023 its Rehousing Guide for resident leaseholders (the **Rehousing Guide**) (**CD 5.5**).

8.12 The Council will continue with its attempts to voluntarily achieve negotiated settlements with all those who own property interests in accordance with the Council's Landlord Offer (**CD 5.2**), an approach consistent with the Guidance. To date, the Council has acquired 19 leasehold interests (comprising 7 resident leaseholder's interest and 12 non-resident leaseholder’s interests) in the Order Land, leaving a total of 45 leasehold interests to be acquired (comprising 23 resident leaseholders and 22 non-resident leaseholders).

8.13 Notwithstanding that the Council shall continue to negotiate with all affected leaseholders, given the number of outstanding interests in the Order Land, and the unregistered parcel, the Council reasonably considers that it may be necessary to acquire all remaining interests by way of a compulsory purchase order.

8.14 The Council shall also continue negotiations with Royal Mail Limited (Plot 1) and UKPN in respect of their respective interests in the Order Land. No objection to the Order has been made by either Royal Mail Limited or UKPN.

9 Human rights considerations

9.1 The Human Rights Act 1998 (the **HRA**) incorporated into domestic law the European Convention of Human Rights (the **Convention**).

9.2 Section 6 of the HRA prohibits a public authority from acting in a way which is incompatible with the Convention. The Guidance provides that a compulsory purchase order should only be made where there is a 'compelling case in the public interest,' and that a public authority pursuing a compulsory purchase order should be sure that the purpose for which it is making that order sufficiently justifies interfering with the human rights of those with an interest in the land affected. In making this assessment, the authority should have regard, in particular, to the provisions of Article 1 of the First Protocol ('A1P1') and Articles 6 and 8 to the Convention.

9.3 The provisions of the Convention that may be at issue in the process of considering, making, confirming and implementing a CPO include Article 6, Article 1 of the First Protocol and Article 8. Taking each in turn:

9.3.1 Article 1 of the First Protocol: this provides that every natural or legal person is entitled to peaceful enjoyment of possessions and includes peaceful enjoyment of property (**Human Right(s)**). It states that "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". The compulsory acquisition of property interests involves interference with a person's rights under this Article. These rights are enjoyed by corporate bodies as well as individuals. However, such interference will be in accordance with the law, and is in the public interest. The Council is of the view that the public benefits of the Scheme do decisively outweigh the detriment to individual interests, particularly given the availability of compensation (or reprovision for many those affected). The demonstrable public benefits mean the Council is satisfied that the Order will strike a fair balance between the private loss of property rights and the public interest in securing the implementation of the Scheme (which is unlikely to happen in the absence of the Order);

9.3.2 Article 6: this provides that in determining the civil rights and obligations of a subject "everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law". This includes property rights. Whether there has been a fair and public hearing will be ascertained in the round, taking into account opportunities to be heard in the consultation process, as well as any formal hearing procedure. As set out in section 8 of this Statement the Council has undertaken, and will continue to undertake, extensive consultation with relevant landowners. Those affected by the Order will be informed and advised of their rights to make representations to the relevant Secretary of State, to be heard as part of the confirmation process, including at any public inquiry that is convened for the Order. Confirmation is reviewable by way of challenge before the High Court. Those affected have also be informed and advised of a fair entitlement to compensation (where applicable), with any dispute resolved by the independent Upper Tribunal (Lands Chamber) if necessary. It is, therefore, considered that the statutory procedures for compulsory purchase is sufficient to satisfy the requirements of this Article;

9.3.3 Article 8: this provides that everyone has the right to respect for their private and family life and correspondence and that there shall be no interference by a public authority with the exercise of this right except in accordance with the law, where there is a legitimate aim and where it is fair and proportionate in the public interest. In view of the considerable public benefits identified in this Statement, the Council is satisfied that the proposed use of compulsory purchase powers for site assembly of the Order Land and the interference caused is justified and falls within these exceptions.

9.4 Any interference with a Human Right must be necessary and proportionate. Compulsory purchase and overriding private rights must be justified by sufficiently compelling reasons in the public interest and must be a proportionate means of achieving the objectives of the Order.

9.5 Similarly, any interference with rights under Article 8 (right to home life) must be "necessary in a democratic society" and proportionate. "Proportionate" in this context means that the interference must be no more than is necessary to achieve the identified legitimate aim, thereby striking a “fair balance” between the rights of the individual and the rights of the public. The requirements under the Convention are reflected in paragraphs 12 and 13 of the Guidance:

"12.3 A compulsory purchase order should only be made where there is a compelling case in the public interest and reasonable efforts have been made by the acquiring authority to negotiate the purchase of land by agreement"

"12.4 An acquiring authority 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. Particular consideration should be given to the provisions of Article 1 of the First Protocol to the European Convention on Human Rights and, in the case of a dwelling, Article 8 of the Convention. Acquiring authorities should also give consideration to the public sector equality duty"

"13.1. The confirming authority when considering a compulsory purchase order has to be able to take a balanced view between the intentions of the acquiring authority and the concerns of those with an interest in land that it is proposing to acquire compulsorily and the wider public interest. The more comprehensive the justification which the acquiring authority can present, the stronger its case is likely to be."

"13.2 The confirming authority will consider each case on its own merits and [the Guidance] is not intended to imply that the confirming authority will require any particular degree of justification for any specific order. It is not essential to show that land is required immediately to secure the purpose for which it is to be acquired. However, a confirming authority will need to understand, and the acquiring authority be able to demonstrate, that there are sufficiently compelling reasons for the powers to be sought at this time."

9.6 In preparation and making of this Order, the Council has at each stage carefully considered the balance to be struck between individual rights and the wider public interest. The 2024 Committee Report (**CD 2.5**) delivered in respect of the Planning Permission (**CD4.2**) noted the following:

"the proposal did not raise any unique human rights or equalities implications…

Given the nature of the proposed estate regeneration scheme, particular attention should be given to the displacement of existing residents… the applicant has pro-actively engaged with the existing residents throughout the whole process. A decant strategy, including rehousing residents has been secured which ensures that there would be no adverse impact to the existing residents' housing situation.

The proposed new residential accommodation would meet inclusive design standards and 34 of the new homes would be wheelchair accessible, 24 within the affordable rented tenure and 10 within the private sector (with the affordable rented homes to be built out to 'fit out' standard). This would benefit future residents, including disabled people, elderly people and parents/carers with children.

…The proposed affordable housing would be of particular benefit to groups that are socially/economically disadvantaged.

The proposed development would not result in the adverse impacts upon equality or social cohesion."

9.7 The Council has been conscious of the need to strike a balance between the rights of the individual and the interest of the public. It has considered the effect of the Articles and concluded that in light of the significant public benefit that would arise from the Scheme, if brought forward, it is in the interest of the wider community to make the Order. Appropriate compensation will be available to those entitled to claim it under the relevant statutory provisions. Reprovision is being offered to many of the affected parties.

9.8 In conclusion, having regard to the matters set out above the Council considers that a compelling case in the public interest exists for the making and confirmation of the Order, and that the interference with Convention Rights is justified in order to secure the economic, social and environmental benefits which the Scheme will bring, namely the creation of new, well-designed, high-quality homes aimed at improving the quality of life for existing and future generations living in the area.

10 Public Sector Equality Duty

10.1 The Public Sector Equality Duty (the **PSED**) was introduced by the Equality Act 2010 (the **EA 2010**) as part of the Government's aim to protect people from discrimination in the workplace and in wider society. The PSED came into force on 5 April 2011 and means that public bodies have to consider all individuals when carrying out their day-to-day work including when shaping policy and delivering services.

10.2 Section 149 of the EA 2010 (**CD 7.7**) established the general equality duty which is that all public authorities are required in the exercise of their functions to have due regard to the need to:

10.2.1 Eliminate discrimination and victimisation of persons that share the characteristics protected under section 4 of the Act. These include the characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex (formerly gender) and sexual orientation;

10.2.2 Advance equality of opportunity between people who share those protected characteristics and people who do not; and

10.2.3 Foster good relations between people who share those characteristics and people who do not.

10.3 The "relevant protected characteristics" are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

10.4 The legislation is not prescriptive about the approach that a public authority should take in order to comply with the PSED. However, principles from case law suggest that each public authority should keep in mind that the duty must be complied with before and at the time a particular policy is under consideration, as well as when a decision is taken. A public authority must also consciously think about the need to do the things set out in the PSED as an integral part of the decision-making process, exercising the duty in substance, with rigour and with an open mind. In light of this and as part of the proposed regeneration of the Estate, the Council has been working closely with residents to ensure they are consulted on all aspects of the new development, and that particular needs are taken into account. This has ensured that the Council better understands how the development will impact residents and that their needs are understood.

10.5 A full Equalities Impact Assessment (**EqIA**) was also undertaken in respect of the proposed redevelopment of the Estate. The EqIA was taken to Cabinet in 2021. As part of the EqIA the Council carried out a survey with the residents from HAP Houses. A telephone and door knocking exercise was conducted and the survey responses formed part of the EqIA. The EqIA was prior to issue of the Statement of Reasons and a desktop exercise was carried out to reflect some of changes to the Scheme. The updated EqIA report can be found at **CD 5.10**). The EqIA highlights how the regeneration programme has sought to deliver a range of positive impacts, while mitigating several negative impacts on certain protected characteristics during the transition phase. The report highlighted that the negative or neutral impacts of the Scheme were generally limited to short term construction and environmental focused impacts as follows:

(a) The disruption accompanying the construction phase is expected to have a negative impact, particularly for older people, disabled people and those with specific health conditions, pregnant mothers and post birth mothers with young babies;

(b) The short-term changes to play space provision are expected to have a negative impact specifically for younger people;

(c) In the short term, the changes to social infrastructure provision are expected to have a neutral impact, particularly for those who worship at the mosque which will be relocated before it is demolished; and

10.6 In the short term, the changes to housing provision are expected to have a neutral impact, particularly as all moves to new properties will be arranged as a single move where possible. This will somewhat mitigate the negative impacts of decant for older and disabled residents, and those with health conditions. A summary of the impacts, specifically in terms of equality is set out below:

(a) Housing needs that respond to a wide range of protected characteristics will be positively enhanced through the development of these new units providing opportunities for housing;

(b) There will be more homes designed to lifetime homes standards and with disability access. Pursuant to condition 36 of the Planning Permission a minimum of 10% (34 dwellings) of the new residential units within the regenerated Estate must be 'wheelchair user dwellings' provided in compliance with Building Regulation requirement M4(3). The approved affordable rent units will be provided as M4(3)(2)(b) wheelchair accessible dwellings, and this will constitute 24 of the 34 wheelchair accessible dwellings. All other wheelchair user dwellings within the remaining tenures will be provided as M4(3)(2)(a) wheelchair adaptable dwellings. This is in accordance with Local Plan Policy D.H3 (**CD 3.3**) (and London Plan Policy D7 (**CD 3.2**));

(c) Improving the housing stock will provide more homes for more people, to higher standards and hence improve the quality of accommodation for residents currently on the Estate;

(d) The design of the Scheme will use sustainable forms of energy such as centralised heating and hot water and photovoltaics to generate electricity. Combined with high levels of thermal insulation, it is hoped this will enable lower running costs for residents (depending on their usage and temperature preferences);

(e) Application of Considerate Contractor requirements to minimise negative impact during construction period;

(f) There will be an expansion of the housing offer (additional units) for those on the waiting list and also hidden household members, many of whom may also have protected characteristics;

(g) The needs of older people and those with disabilities will be enhanced by the development of properties built to lifetime homes standards;

(h) Families will have units that are in much better condition than they are currently;

(i) There will be more 3 and 4 bed units which will address the overcrowding experienced by some of the existing residents of HAP Houses, both tenants and leaseholders. These units will also help meet the needs of those families across the borough in overcrowded conditions;

(j) The new homes will be built to meet residents' specific housing needs such as the inclusion of aids and adaptations. As well as considering design features that ensure the safety of vulnerable children and adults with severe learning difficulties such as autism; and

(k) The improved and expanded play space provided as part of the completed development is expected to have appositive impact for young residents.

10.7 Steps are being taken to ensure that the acquisition and relocation processes are applied in a fair and non-discriminatory way. It is acknowledged that the process of redeveloping HAP Houses is likely to have a negative impact on older, disabled and vulnerable residents,

due to the requirements to move house. However, the changes to the housing provision are expected to have a neutral impact, particularly as all moves to new properties will be arranged as a single move where possible. This will somewhat mitigate the negative impacts of decant for older and disabled residents, and those with health conditions.

10.8 The overall impact of the Scheme on those with protected characteristics will be beneficial and as set out in the 2024 Committee Report, the Scheme will benefit future residents, including disabled people, elderly people and parent/carers with children.

10.9 The EqIA (**CD 5.10)** will continue to be monitored and reviewed throughout the progression of the proposals and working in close collaboration between Council departments, the ITLA and residents themselves will ensure the Council reduce, mitigate or even eradicate negative impacts of the Scheme and the proposed interventions will be embedded into our local stakeholder engagement approach.

11 Special Considerations and Special Category Land

11.1 The Scheme will not involve the demolition/alteration/extension of:

11.1.1 Any buildings listed under section 1 of the Planning (Listed Buildings and Conversation Areas) Act 1990;

11.1.2 Any buildings which are the subject of a building preservation notice or demolition/alteration/extension of any buildings which may qualify for inclusion in the statutory list;

11.1.3 Any buildings which are included in a conservation area designated under section 69 or section 70 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and which require listed building consent for demolition and/or re-development;

11.1.4 Any monuments which are scheduled under section 1 of the Ancient Monuments and Archaeological Areas Act 1979; or

11.1.5 Any parks/gardens/historic battlefields which are registered under section 8C of the Historic Buildings and Ancient Monuments Act 1953.

11.2 The Council has identified areas within the Estate which may constitute open space. None of those areas are within the Order Land. On 31 January 2024 Cabinet granted approval for the Council to take all necessary steps to effect the appropriation of the Estate (including the potential areas of open space) for planning purposes in accordance with section 122(1) of the Local Government Act 1972 (**CD 2.4** and **CD 7.2** respectively). Following the appropriation for planning purposes, the Council will be able to exercise powers under section 203 of the Housing and Planning Act 2016 (**CD 7.3**) to interfere with existing rights annexed to adjoining land that may adversely affect the Estate. Following the Cabinet's decision in respect of the appropriation and subsequent consent from the Secretary of State on 29 October 2024 (**CD 2.6** and **2.7** respectively), the Council does not consider that the existence of any areas of open space will be a hindrance to the delivery of the Scheme.

11.3 The Council is progressing discussions with statutory undertakers who have apparatus within the Estate. Only one statutory undertaker, UK Power Network (**UKPN**), has apparatus which falls within the Order Land. The Council are in discussions with UKPN to seek the

necessary arrangements to secure the release of UKPN's interest in the Order Land and the grant of new rights in respect of new substations to be provided as part of the Scheme.

12 Council Response to Objections to the Order

12.1 In total, 7 objections were received to the Order (**CD 1.1**), which relate to 5 properties within the Order Land.

12.2 The position of each objector is summarised in the following paragraphs, together with a summary of the Council's response. The Council reserves the right to expand upon and add to the matters summarised below, when submitting evidence to the public inquiry to be held in respect of the Order.

12.3 Objector 1 - Objection dated 8 May 2025

12.3.1 Objection Ground 1: *The Order does not comply with all relevant statutory requirements. The Council has not provided sufficient evidence to show that the redevelopment scheme for which the Order is being pursued is necessary, viable, deliverable within a reasonable timescale, or properly funded.*

12.3.2 Response: The statutory requirements with which the Council is required to comply are contained within s.226 of the 1990 Act (**CD 7.1**) and the Acquisition of Land Act 1981. The Council is satisfied it has complied with all relevant requirements within these Acts and notes that no specific non-compliance has been identified by the Objector.

12.3.3 With respect to viability, funding and delivery mechanisms, which relate to the policy tests that the Council should satisfy, please see sections 7.10.6 to 7.10.9 of this Statement. The Council has already entered into a Pre-Construction Services Agreement with Countryside, an experienced developer with a track record of delivering new homes, within the Borough and nationally. Cabinet earlier this year awarded additional funds for Scheme, such funds will be sufficient to meet all costs to date including costs obtaining planning permission but will also cover all land assembly costs as well as the cost of delivering the replacement homes in Phase 1, with the remainder of the Scheme to be funded by the development partner and potentially through grant funding. There is therefore clear evidence of funding for the Scheme and that it is deliverable. Furthermore, the Council has a clear programme for the delivery of the Scheme as noted above with Phase 1 (which includes the replacement homes) being delivered within approximately two-and-a-half years, and the remainder of the Scheme completed within a period of five to six years. Therefore, the Council considers that there is a reasonable prospect of the Scheme proceeding in a timely manner.

12.3.4 It is unclear from the objection what other impediments are considered to have been overlooked by the Council or likewise why it is considered that the Scheme cannot be delivered within a reasonable timescale.

12.3.5 Objection Ground 2: *The acquiring authority has not demonstrated that the design of the scheme is effective and appropriate.*

12.3.6 Response: the Scheme design was ultimately assessed as part of the planning process and Planning Permission was subsequently granted (**CD 4.2**) having regard to the requirements of the National Planning Policy Framework (**CD 3.1**) and local development plan documents (**CD 3.3**). The report to the Development Committee on 12 June 2024 sets out a detailed analysis of the Scheme against applicable planning policies (**CD 2.5**). In summary, and as set out in section 5.4 of this Statement, the Scheme was designed to meet housing needs with 64 homes being re-provided for existing social rented and shared equity homes and of the remaining 343 homes, 111 will be affordable. The Scheme will also deliver an increased number of three or four bed houses so as to reduce overcrowding on the Estate and meet the needs of families. The Scheme has been designed to create new, well-designed, high-quality homes aimed at improving the quality of life for existing and future generations living in the area including with the provision of amenity space, and which can accommodate a standalone new mosque / community centre to serve the community.

12.3.7 Objection Ground 3: *The acquiring authority has not demonstrated that there are no planning or other impediments to the delivery of the scheme.*

12.3.8 Response: Planning Permission for the Scheme was recently granted on 27 June 2025 (**CD 4.2**). The Council considers that all conditions and obligations are capable of being discharged and consequently, there are no planning impediments to carrying the Scheme. As to any other impediments, before making the Order the Council considered the issue of whether there are any other impediments to carrying out the Scheme. As set out at section 7.10 of this Statement, the Council does not consider there to be any impediments to securing vacant possession or overriding any third-party rights and the Council is confident that there is a more than reasonable prospect of the Scheme proceeding.

12.3.9 Objection Ground 4: *The acquiring authority has not sufficiently explored or considered alternative ways of achieving its objectives that would not require the compulsory purchase of the objector's leasehold interest.*

12.3.10 Response: The Council considered alternatives to demolition before the Residents' Ballot took place in 2020. This included the Council holding consultation events to explore alternative options, such as refurbishment with potential infilling. The Council also compared the potential results of an infill scheme and regeneration scheme on its website for the Scheme. Most residents responded that refurbishment would only provide a temporary solution as it could not effectively address issues such as damp, poorly laid out communal areas and limited accessibility within the blocks. There would also be substantial costs for leaseholders to meet if this option was chosen. Sections 6.9 and 7.11.1 of this Statement detail the issues with existing HAP Houses, including damp, overcrowding and poor-quality amenity space. The Residents' Panel also met to discuss issues with the current estate. The Panel indicated that infill/refurbishment would not meet their aspirations and were content for Council officers to explore the regeneration option. This led to the Residents' Ballot in which 90% of respondents voted in favour of redevelopment. The Council remains of the view that regeneration of the Estate in accordance with the Scheme remains the best option, which will appropriately address residents'

concerns with the existing buildings and layout of the estate and which will also deliver a wide range of public benefits, including the delivery of new homes and new affordable homes.

12.3.11 As to the potential for avoiding compulsory purchase of the objector's interest, the Council notes that the demolition of the Objector's block (being one of HAP Houses) is integral to delivery of the Scheme. It would not be possible to avoid compulsorily acquiring the objector's interest (save through voluntary acquisition) and deliver the remainder of the Scheme as proposed. The objector has not suggested any alternative that would satisfy the objectives of the Scheme and be capable of coming forward within a reasonable timescale. The Council does not consider that there is any such reasonable alternative.

12.3.12 Objection Ground 5: *There has been a lack of proactive and meaningful consultation with the objector, despite the impact on its legal and financial interests.*

12.3.13 Response: Section 8 of this Statement summarises the steps taken by the Council on consultation and engagement which included the Resident's Ballot, resident panels, multiple resident consultations and drop in sessions. Newsletters were also issued every three to four months and the Council's 'Let's Talk' website was kept up to date. The response at 12.3.15 below also sets out direct engagement had with this Objector.

12.3.14 Objection Ground 6: *There has been no genuine attempt by the acquiring authority to acquire by agreement prior to seeking compulsory purchase powers.*

12.3.15 Response: The Landlord Offer (**CD 5.2)** sets out the basis on which the Council would seek to voluntarily acquire properties. The Council considers this to be a generous offer. In addition, as set out above, various drop in events have been held and letters/correspondence were issued to leaseholders setting out the process for selling properties. As set out in section 8.10 of this Statement, the buyback programme began in July 2023 with leaseholders receiving letters from JLL, the Council's appointed consultant, seeking to arrange an inspection of leaseholder properties with a view to valuating the properties. The Council has continued to actively progress negotiations with leaseholders during this time. JLL has engaged with this Objector since 2023. This includes arranging for an inspection of the property, following which an offer letter was issued to the Objector on 22 December 2023. There were ongoing discussions between JLL and the objector (and Ardent Management Limited (**Ardent**) as their agent) throughout 2024 and 2025 regarding the valuation of the property and compensation entitlements. Following the submission of the objection, the Council and JLL met with the objector on 12 August 2025 to discuss the Objector's concerns.

12.3.16 Objection Ground 7: *The compensation likely to be available will not enable the objector to acquire a suitable alternative property with a comparable leasehold interest in the local area.*

12.3.17 Response: The Council issued its Landlord Offer in February 2020 (**CD 5.2**), which explains the Council's proposals to voluntarily acquire interests in the Estate and leaseholder's entitlements. The Landlord Offer complies with the

statutory framework and Government guidance. The Council has appointed external consultants, JLL, to assess the value of existing properties on the estate and to seek to agree valuations with parties' respective surveyors so that the Council can voluntarily acquire properties without the need to rely on compulsory purchase powers.

12.4 **Objectors 2a and 2b – Two objections dated 9 May 2025**

12.4.1 The two objections were issued by joint leaseholders and mirrored each other.

12.4.2 Objection Ground 1: *Lack of Meaningful Consultation: Despite the Council's statutory obligations, residents and stakeholders were not adequately engaged or consulted. Information about the proposed development was poorly disseminated, and key concerns raised during preliminary consultations have not been meaningfully addressed.*

12.4.3 Response: Section 8 of this Statement summarises the steps taken by the Council on consultation and engagement which included the Resident's Ballot, resident panels, multiple resident consultations and drop in sessions. Newsletters were also issued every three to four months and the Council's 'Let's Talk' website was kept up to date. As set out in above, a Residents' Ballot was held between 18 March and 9 April 2020 in respect of which there was a 95% turnout suggesting good engagement. The majority of residents (90%) voted in favour of redevelopment after the Landlord Offer (**CD 5.2)** was presented to residents. The Objector was also engaged in the survey relating to the EqIA (**CD 5.10**).

12.4.4 The Landlord Offer, together with the Rehousing Guide (**CD 5.5**), sets out the basis on which the Council would seek to voluntarily acquire properties. The Council considers this to be a generous offer. In addition, as set out above, various drop in events have been held and letters/correspondence were issued to leaseholders setting out the process for selling properties. As set out in section 8.10 of this Statement, the buyback programme began in July 2023 with leaseholders receiving letters from JLL, the Council's appointed consultant, seeking to arrange an inspection of leaseholder properties with a view to valuating the properties. The Council has continued to actively progress negotiations with leaseholders during this time. JLL has engaged with this Objector since 2023. An offer letter was served by JLL on the leaseholders of the Objector's property on 15 September 2023. There was extensive correspondence between JLL and the objector (and Ardent as their agent) throughout 2024 and 2025 regarding the valuation of the property and the Council's offer. Following the submission of the objection, the Council and JLL met with the objector on 29 August 2025 to discuss the objector's concerns.

12.4.5 The objectors do not specify the ‘key concerns’ that they say were not meaningfully addressed and so it is not possible to comment further upon this.

12.4.6 The Council considers that it has carried out extensive engagement with all interest holders and that that the claim that the Council has not meaningfully consulted and engaged is without merit.

12.4.7 Objection Ground 2: *Loss of Community and Social Infrastructure: Harriott House, Apsley House, Pattison House is home to a long-established and*

cohesive community. The proposed development threatens to displace residents, many of whom have deep roots in the area. No sufficient guarantees have been given regarding the right to return, affordable housing provision, or safeguarding of community facilities.

12.4.8 Response: The Council disagrees that it has not offered sufficient guarantees regarding the right to return, affordable housing or the safeguarding of community facilities. Maintaining community cohesion is at the heart of the Scheme. In line with the Council's Landlord Offer (**CD 5.2)**, the Council has committed to ensuring that resident leaseholders and secure tenants have the right to remain on the estate.

12.4.9 The Council is committed to ensuring that residents who wish to remain within the Estate are rehoused in suitable alternative accommodation within Phase 1 of the Scheme. Replacement homes are being made available to the 28 existing resident leaseholders and 36 secure tenant properties. The Planning Permission (**CD 4.2**) for the redevelopment of the Scheme also secures a minimum affordable housing provision. Of the remaining 343 homes coming forward as part of the Scheme, 111 will be affordable resulting in a 40% (by habitable room) affordable offering. Safeguarding / enhancing existing community facilities has also been at the heart of the Scheme.

12.4.10 The Council is committed to providing a new replacement facility for the mosque within the estate and has obtained Planning Permission (**CD 4.2**) for a new standalone replacement facility. This was procured following representations from the current operators of the mosque that they preferred a standalone building rather than being located under new residential properties.

12.4.11 Objection Ground 3: *Alternative Options Not Properly Considered: The Council has failed to explore less disruptive alternatives, such as refurbishment or infill development, which could achieve regeneration objectives without wholesale displacement.*

12.4.12 Response: The Council considered alternatives to demolition before the Residents' Ballot took place in 2020. This included the Council holding consultation events to explore alternative options, such as refurbishment with potential infilling. The Council also compared the potential results of an infill scheme and regeneration scheme on its website for the Scheme. Most residents responded that they considered refurbishment would only provide a temporary solution as it could not effectively address issues such as damp, poorly laid out communal areas and limited accessibility within the blocks. There would also be substantial costs for leaseholders if this option was chosen. Sections 6.9 and 7.11.1 of this Statement detail the issues with existing HAP Houses, including damp, overcrowding and poor-quality amenity space. The Residents' Panel also met to discuss issues with the current estate. The Panel indicated that infill/refurbishment would not meet their aspirations and were content for Council officers to explore the regeneration option. This led to the Residents' Ballot in which 90% of respondents voted in favour of redevelopment. The Council remains of the view that regeneration of the estate in accordance with the Scheme remains the best option, which will appropriately address residents' concerns with the existing buildings and layout of the Estate and which will also

deliver a wide range of public benefits, including the delivery of new homes and new affordable homes.

12.4.13 Objection Ground 4: *Unclear Public Interest Justification: The Council must demonstrate that the CPO is genuinely in the public interest and proportionate. In this case, the benefits are vague, and the social cost to the community appears disproportionate to the claimed gains.*

12.4.14 Response: As set out within section 7 of this Statement, there is a compelling justification in favour of the Order and the Council considers that the Scheme will contribute towards the economic, social and environmental improvement of the area. Section 7.8 of this Statement sets out the benefits to the Scheme, these include:

(a) Additional housing;

(b) Re-provision of the 36 social rent homes for existing tenants along with 111 GLA funded social rent homes (including homes for qualifying adult children of secure tenants);

(c) 10% additional homes being wheelchair accessible;

(d) Improved living conditions including homes built to modern housing standards and new community centre and mosque;

(e) New employment and training opportunities and contributions towards employment and skills training;

(f) Payment to be applied towards local infrastructure via community infrastructure levy; and

(g) scope for new child play equipment and allotments for allocated households.

12.4.15 As set out within sections 9 and 10 of this Statement, the Council has also had due regard to its duties under the Human Rights Act and the Public Sector Equality Duty (**CD 7.6 and 7.7**). Given the significant public benefits arising from the Scheme, the Council considers that interference with relevant rights under the Human Rights Act is justified.

12.4.16 Objection Ground 5: *Impact on Vulnerable Groups: The redevelopment will disproportionately affect vulnerable residents, including the elderly, families with young children, and low-income households, without sufficient safeguards being set out.*

12.4.17 Response: As set out at section 10 of this Statement, a full EqIA was undertaken (**CD 5.10**) which highlights how the Council has sought to deliver positive impacts and mitigate negative impacts on protected characteristics, having regard to the Public Sector Equality Duty (**CD 7.7**). The positive impacts of the Scheme are noted at 7.9 of the EqIA. It is concluded that the overall impact of the Scheme on those with protected characteristics is positive (section 10.8 of this Statement) though the EqIA and Council acknowledge that there will be negative impacts

'particularly for older people, disabled people and those with specific health conditions' (section 10.5(a) and 10.7 of this Statement and sections 7.5-7.6 of EqIA). The Council has put in place various measures to mitigate the impacts on people with these characteristics, including:

(a) a commitment to arrange all moves as single moves where possible;

(b) 10% of new homes are to be accessible; and

(c) increased number of homes will be designed to Category 2 standard for accessibility.

12.4.18 The Council is committed to working with vulnerable residents to seek to mitigate the impacts of the regeneration and to ensure that they are offered suitable replacement homes. The Objector has also been invited to discuss any specific concerns they have (none having been identified in the objection letter) and which they wish the Council to take into consideration.

12.4.19 Objection Ground 6: *Flaws in the CPO Process: There are concerns regarding compliance with legal and procedural requirements in the CPO process, including the failure to provide clear evidence on viability, funding, and delivery mechanisms for the proposed development.*

12.4.20 Response: The statutory and procedural requirements with which the Council is required to comply are contained within s.226 of the Town and Country Planning Act 1990 (**CD 7.1**), and the Acquisition of Land Act 1981. The Council is satisfied it has complied with all relevant requirements within these Acts, as well as the Guidance (**CD 3.4**), and notes that no specific non-compliance has been identified by the Objector.

12.4.21 With respect to viability, funding and delivery mechanisms, please see sections 7.10.6 to 7.10.9 of this Statement. The Council has already entered into a Pre-Construction Services Agreement with Countryside, an experienced developer with a track record of delivering new homes, within the Borough and nationally. Cabinet earlier this year awarded additional funds for Scheme, such funds will be sufficient to meet all costs to date including costs obtaining planning permission but will also cover all land assembly costs as well as the cost of delivering the replacement homes in Phase 1, with the remainder of the Scheme to be funded by the development partner and potentially through grant funding. There is therefore clear evidence of funding for the Scheme and that it is deliverable. Furthermore, the Council has a clear programme for the delivery of the Scheme as noted above with Phase 1 (which includes the replacement homes) being delivered within approximately two-and-a-half years, and the remainder of the Scheme completed within a period of five to six years. Therefore, the Council considers that there is a reasonable prospect of the Scheme proceeding in a timely manner. It is unclear from the objection what other impediments are considered to have been overlooked by the Council or likewise why it is considered that the Scheme cannot be delivered within a reasonable timescale.

12.5 **Objectors 3a and 3b - Two objections dated 14 May 2025**

12.5.1 The two objections were each lodged by a leaseholder of the property and mirrored each other in content.

12.5.2 Objection Grounds 1, 2 and 4*: Rejection of Phase 1 Property Offer, Assurance of Suitable Reprovision, Payment of Rent during Temporary Re-housing: the Objector rejects the Council's offer of a property within Phase 1 and wishes to remain in the current location. The proposal does not meet expectations or requirements, and they do not consent to being relocated to a property that is not suitably matched to the Objector's current home in terms of location, layout, or quality. The Objector also opposes the policy which requires leaseholders to fund their own rent in temporary accommodation for Phases 2 and beyond.*

12.5.3 Response: The Objector's preference is to be permanently rehoused in Phase 2. During the demolition of Phase 1, they wish to be rehoused off the Estate and for the Council to meet any rent and other relevant costs incurred during this intervening period. As part of the Landlord Offer (**CD 5.2**), the Council has committed to a single decant where possible. Where a single decant cannot be achieved and temporary decant is required, resident leaseholders would not be charged rent for the relevant period and the Council would also cover reasonable moving costs for both moves. However, the Council is confident that it can allocate the Objector a suitable replacement property within Phase 1 which will suit their requirements. The Council is in the process of developing a policy for the allocation of new homes to existing resident leaseholders and will contact with this Objector in due course to discuss these details further. Where a suitable property is available in Phase 1, the Council does not consider it necessary to rehouse resident leaseholders in Phase 2. This would result in disproportionate additional costs to the Council and would be unfair to other leaseholders who have had properties allocated in accordance with the Landlord Offer.

12.5.4 The Council has also met with the Objector to discuss details of the offer property. The Council is offering a 3 bed replacement property which will be bigger (minimum 86 sqm) than the Objector's current property (76.5 sqm) and approximately 30-40 metres from the Objector's current location. The Council have also provided floor plans, details of potential fixtures and fittings and advised on the ability to input into details of the fixtures and fittings. This includes underfloor heating, a large balcony and the option of having an open plan or separate kitchen layout to suit the Objector's preferences. Shared amenities will include allotments, green spaces, and playgrounds.

12.5.5 Objection Grounds 3 and 5*: Right to Remain Until Demolition and Council Responsibility for Interim Accommodation Beyond Phase 1: the Objector expects the Council to guarantee that the Objector and their household may remain in legal possession of the property until the point of actual demolition. Premature relocation without necessity or clear scheduling undermines the rights of residents and contributes to undue stress and instability. The Objector also considers it unacceptable that the Council is not supporting leaseholders who choose to return to properties in later phases of the regeneration and if the permanent home is unavailable for some time, it should be the Council's duty to offer secure, cost-free temporary accommodation until my permanent housing is ready.*

12.5.6 Response: if the Order is confirmed, the Council does not intend to implement the Order to obtain vacant possession until shortly before demolition of the property. It has been discussed with the leaseholder that if they were to agree to sell their home through private negotiation and wish to take up the offer of a replacement home in Phase 1, the Council will work to the objector's reasonable timescales having regard to the construction programme.

12.5.7 *Objection Ground 6: Housing Consideration for Children of the objector: the Objector's five adult children reside at the property. Three of the Objector's children have been on the Council's housing waiting list for a number of years. Given their ties to the address and community and the number of years three of them have been on the housing register, the Objector requests each of them be given the opportunity to be rehoused within the regenerated Estate at social rent.*

12.5.8 Response: As set out within the Landlord Offer (**CD 5.2**), the Council has committed to offering qualifying adult children on the housing register the opportunity to be rehoused in a new Council home within the estate at London Affordable Rent levels. The Council is not obliged to offer to prioritise adult children already living on the Estate but has done so in an effort to support families and ensure cohesion. However, the Council has had to place a reasonable limit of one qualifying child per property, in order to ensure that other new Council homes are offered to people on the housing register in order of priority. The Council has met with the Objector and confirmed that in line with the Landlord Offer, they can re-house one of the Objector's adult children on the Estate but for the reasons explained above, and on the basis that two of the children have live bids for other properties, the Council cannot agree to re-house the remaining adult children.

12.5.9 *Objection Ground 7* : *Lack of Transparency and Declining Estate Conditions: The regeneration process has been marked by a lack of transparency with residents receiving minimal information on critical aspects of the development, including the mix between social and private housing, pricing, service charges, or maintenance standards. Furthermore, the general condition of the estate has visibly declined since the regeneration accelerated, while service charges in the estate continue to rise.*

12.5.10 Response: Section 8 of this Statement summarises the steps taken by the Council on consultation and engagement which included providing information on key detail of the proposed development. This includes (but is not limited to) the following:

(a) Consultation before the Resident's Ballot which included:

i distributing newsletter summarising the latest design proposals, resident attendance at consultations, feedback on the scheme and an updated timeline;

ii creation of the LBTH ‘Lets Talk’ website to provide information on the scheme and relevant background materials including links to planning and cabinet decisions and Landlord Offer (**CD 5.2)** documents and encourage feedback;

(b) The Landlord Offer set out details relating to the design principles for the Scheme, provided background information as to the proposals. And also informed leaseholders that there would be opportunity to input into the selection of materials and colours for details such as kitchen units, floor coverings and wall colour in selected rooms;

(c) Post-Resident's Ballot newsletters were distributed to residents and which included details relating to the evolution of the design, updated timelines and project officers' details;

(d) Various consultation events were held to allow leaseholders to raise any questions they had regarding the scheme and the Council also has held design consultation events and events for residents to meet, for example, the developer team and the buyback team;

12.5.11 The Council also disagrees that the Estate condition has declined despite increased service charges. Further, this is considered to fall out of the scope of the CPO process and leaseholders have a route to challenging the estate conditions via the appropriate department at the Council. The Council intends to continue providing ongoing maintenance services leading up to the redevelopment. The new Scheme will result in improved living conditions including homes built to modern housing standards and a new community centre and mosque and new and improved green spaces and playgrounds. The development will also result in financial sums to be applied towards local infrastructure via the community infrastructure levy.

12.5.12 *Objection Ground 8: Outdated Property Valuation: The valuation of the Objector's property, conducted by JLL, dates back to 2023 and does not reflect the current market conditions or the increased value of similar properties in the area. The Objector does not accept this valuation as a fair or lawful basis for compensation. A new, independent valuation is required that accurately reflects today's market value.*

12.5.13 Response: The Council issued its Landlord Offer in February 2020 (**CD 5.2**), which explains the Council's proposals to voluntarily acquire interests in the Estate and leaseholder's entitlements. The Rehousing Guide (**CD 5.5**) also provides further information on the terms for selling homes back to the Council and entitlement to compensation. The Landlord Offer and the Rehousing Guide comply with the statutory framework and Government guidance. The Council has appointed external consultants, JLL, to assess the value of existing properties on the estate and to seek to agree valuations with parties' respective surveyors so that the Council can voluntarily acquire properties without the need to rely on compulsory purchase powers. The Objector has not made a counteroffer or engaged in discussions with JLL or the Council about the value save for stating that the valuation is outdated. JLL consider that the valuation was accurate as at the date it was issued to the Objector. The market value of the property will be reviewed again at the appropriate valuation date.

12.5.14 While the Council is continuing to pursue voluntary acquisition, it notes that compensation is not a matter which is subject to determination in the public inquiry. There is a formal process for dealing with disputes about compensation

entitlement through the Upper Tribunal (Lands Chamber), as set out at paragraph 23 of the compensation guidance (CPO Guide 4 on compensation for residential owners and occupiers (**CD 3.5**)). Information on how to access the compensation guidance and contact details for the Tribunal were included in the Introduction Letter sent to all resident leaseholders on 5 June 2023.

12.5.15 The Council remains committed to ongoing dialogue with leaseholders to seek to agree the valuation and the voluntary acquisition of the remaining properties. The Council met with one of the Objectors and one of the adult children residing at the property on 1 July 2025 and has since written to both objectors on 3 and 4 September respectively acknowledging their objections and providing initial responses to the contents of the objections. These letters contained the note of the meeting held on 1 July 2025.

12.5.16 Objection Ground 9: *Inadequate Community Engagement and lack of empathy: The Council's outreach the process has been inadequate. Beyond a few tokenistic community meetings, there has been little genuine engagement with residents. This limited and box-ticking approach demonstrates a concerning lack of empathy and understanding of the deep emotional and cultural significance this estate holds for families within the Estate.*

12.5.17 Response: Section 8 of this Statement summarises the steps taken by the Council on consultation and engagement which included the Resident's Ballot, resident panels, multiple resident consultations and drop in sessions. Newsletters were also issued every three to four months and the Council's 'Let's Talk' website was kept up to date. As set out in above, a Residents' Ballot was held in between 18 March and 9 April 2020 in respect of which there was a 95% turnout suggesting good engagement. The majority of residents (90%) voted in favour of redevelopment after the Landlord Offer (**CD 5.2**) was presented to residents. The Council considers that it has carried out extensive engagement with all interest holders and that that the claim that the Council has not meaningfully consulted and engaged is without merit.

12.5.18 Retaining community support throughout the development of the scheme and CPO process and ensuring the community are supportive of the scheme has been at the core of the development proposals. The Council considers it has carried out extensive engagement and that it has listened to feedback provided throughout the process and can demonstrate in some cases it has made alterations to the scheme in response to such feedback, for example the Planning Application for the Planning Permission incorporated a standalone mosque in response to feedback.

12.6 **Objector 4 – Objection dated 15 May 2025 (email and letter)**

12.6.1 Objection: *the Objector's preferred option is a lease swap, which would allow the household to continue living within a familiar community setting that supports their daily routines, wellbeing, and medical needs.*
If a lease swap is not possible, then their alternative would be a ground floor property in the new development, with direct access to a private garden and allocated disabled parking. This is considered essential due to health and mobility-related reasons. The Objector has raised that their housing needs fall

under the protections of the Equality Act 2010 and that, under the Public Sector Equality Duty, there is a requirement to consider how policies and decisions affect people with protected characteristics, including those with long-term health conditions and mobility impairments.

12.6.2 Response: the Council has been in touch with the Objector to carry out a medical assessment. The outcome of that assessment recommended that the leaseholder should be provided with a wheelchair-accessible, ground-floor property with wet room facility. The Council has taken this into account and is looking to identify a suitable ground-floor home within the Scheme. In the event the objector does not elect to take an offer property within the regenerated Estate the Council has also made offers to make reasonable adaptions to a suitable replacement property found by the objector off-site. The Objector currently has 3-bedroom flat located on the first floor with a balcony; the current block is not serviced by a lift.

12.6.3 As set out at section 10 of this Statement, a full EqIA (**CD 5.10**) was undertaken which highlights how the Council has sought to deliver positive impacts and mitigate negative impacts on protected characteristics, having regard to the Public Sector Equality Duty (**CD 7.7**). The positive impacts of the Scheme are noted at 7.9 of the EqIA (**CD 5.10**). It is concluded that the overall impact of the Scheme on those with protected characteristics is positive (section 10.8), though the EqIA and the Council acknowledge that there will be negative impacts 'particularly for older people, disabled people and those with specific health conditions' (section 10.5(a) and 10.7 of this Statement) (7.5-7.6 of the EqIA). As set out within sections 9 and 10 of this Statement, the Council has also had due regard to its duties under the Human Rights Act (**CD 7.6**) and the Public Sector Equality Duty (**CD 7.7**). Given the significant public benefits arising from the Scheme, the Council considers that interference with relevant rights under the Human Rights Act is justified. The Council has put in place various measures to mitigate the impacts on people with protected characteristics, including:

(a) a commitment to arrange all moves as single moves where possible;

(b) 10% of new homes are to be accessible;

(c) increased number of homes will be designed to Category 2 standard for accessibility.

12.6.4 The Council is committed to working with vulnerable residents to seek to mitigate the impacts of the regeneration and to ensure that they are offered suitable replacement homes. The Council met with one of representatives for the objector on 12 June 2025 and has since written to the objector on 1 September acknowledging their objections and providing initial responses to the contents of the objection and appending the note of the meeting held on 12 June 2025.

12.7 **Objector 5 – Objection dated 15 May 2025**

12.7.1 Objection Ground 1: *Overdevelopment and Pressure on Local Infrastructure: The proposed redevelopment will lead to a marked increase in population density, placing significant pressure on local infrastructure, including public transport, healthcare, education, and green spaces. This level of overcrowding threatens*

the quality of life for existing residents and undermines the character and liveability of the neighbourhood.

12.7.2 Response: There is an urgent need for new housing within the Borough, as well as nationally. As set out within section 5.3 of this Statement, the Council's current housing target is for an additional 39,310 new homes to meet local housing needs, and between March 2023 and April 2024 there were over 24,000 households on the Council's housing register seeking affordable accommodation within the Borough. The Scheme and the increased density on the Estate will help to alleviate some of this pressure through the provision of new homes, including new affordable homes.

12.7.3 The Scheme has been designed to create new, well-designed, high-quality homes aimed at improving the public realm and quality of life for existing and future generations living in the area. Safeguarding and enhancing existing community facilities has also been at the heart of the Scheme. The Council is committed to providing a new replacement facility for the mosque within the Estate and has sought and obtained the Planning Permission (**CD 4.2**) which secures a new standalone replacement facility, following representations from the current operators of the mosque that they preferred a standalone building rather than being located under new residential properties. The design of the Scheme is therefore effective in terms of seeking to utilise the site for the delivery of new modern homes with a qualitative increase in both affordable and market dwellings, as well as delivering amenity space and community facilities.

12.7.4 As part of the Planning Application process, the impacts of the Scheme were considered acceptable and the Scheme was found to be in accordance with the development plan (the Council's committee report in respect of the Planning Application is contained at **CD 2.5**). The Planning Permission secures the provision of various infrastructure, including the provision of a new mosque and community centre, new public realm and play space, as well as highway works. The Planning Permission also secures contributions amounting to £190,632 towards construction phase employment training. Furthermore, approximately £2,134,597.25 will be payable in CIL and £867,398.94 in Mayor of London CIL.

12.7.5 Objection Ground 2: *Inadequate Compensation and Property undervaluation: The compensation offered falls below the fair market value and fails to reflect both current property prices and the considerable financial and emotional investment residents have made over the years. The Objector also considers that they will be unable to afford anything similar with the compensation offered and will have to move out of the area, away from friends, families, and the community. Additionally, the costs associated with relocation have not been adequately considered. The forced displacement will result in increased travel time and expenses for commuting to work, which places an additional financial burden on affected residents. The compensation package must account for these ongoing costs, ensuring that residents are not left worse off due to the Council's actions.*

12.7.6 Response: The Council issued its Landlord Offer in February 2020 (**CD5.2**), which explains the Council's proposals to voluntarily acquire interests in the Estate and leaseholder's entitlements. The Rehousing Guide (**CD 5.5**) also provides further information on the terms for selling homes back to the Council

and entitlement to compensation. The Landlord Offer and the Rehousing Guide comply with the statutory framework and Government guidance. The Council has appointed external consultants, JLL, to assess the value of existing properties on the estate and to seek to agree valuations with parties' respective surveyors so that the Council can voluntarily acquire properties without the need to rely on compulsory purchase powers. While the Council is continuing to pursue voluntary acquisition, it notes that compensation is not a matter which is subject to determination in the public inquiry. There is a formal process for dealing with disputes about compensation entitlement through the Upper Tribunal (Lands Chamber), as set out at paragraph 23 of the compensation guidance (CPO Guide 4 on compensation for residential owners and occupiers (**CD 3.5**)). Information on how to access the compensation guidance and contact details for the Tribunal were included in the Introduction Letter sent to all resident leaseholders, including the Objector, on 5 June 2023.

12.7.7 Objection Ground 3: *Legal Grounds for Objection: The current CPO process fails to meet the legal requirements for fair compensation and adequate consultation. Under the Human Rights Act 1998, residents have the right to peaceful enjoyment of their property, and any interference must be proportionate and justified. The undervaluation of properties and lack of meaningful engagement with affected residents violates these principles. Furthermore, the Equality Act 2010 requires public authorities to consider the impact of their decisions on vulnerable groups. The forced displacement of residents—many of whom may face financial hardship due to relocation—raises serious concerns about whether the council has fulfilled its public sector equality duty.*

12.7.8 Response: Section 8 of this Statement summarises the steps taken by the Council on consultation and engagement which included the Resident's Ballot, resident panels, multiple resident consultations and drop-in sessions. Newsletters were also issued every three to four months and the Council's 'Let's Talk' website was kept up to date. As set out in above, a Residents' Ballot was held in between 18 March and 9 April 2020 in respect of which there was a 95% turnout suggesting good engagement. The majority of residents (90%) voted in favour of redevelopment after the Landlord Offer was presented to residents. The Objector was also engaged in the survey relating to the EqIA (**CD 5.10**).

12.7.9 The Landlord Offer (**CD 5.2**) together with the Rehousing Guide (**CD 5.5**) set out the basis on which the Council would seek to voluntarily acquire properties. The Council considers this to be a generous offer. In addition, as set out above, various drop in events have been held and letters/correspondence were issued to leaseholders setting out the process for selling properties. As set out in section 8.10 of this Statement, the buyback programme began in July 2023 with leaseholders receiving letters from JLL seeking to arrange an inspection of leaseholder properties with a view to valuating the properties. The Council has continued to actively progress negotiations with leaseholders during this time. An offer letter was served by JLL on the leaseholders of the Objector's property on 19 March 2024 following an inspection which took place on 6 February 2024. There was ongoing correspondence between JLL and the Objector (and Ardent as their agent) throughout 2024 and 2025 regarding the valuation of the property and the Council's offer, this included correspondence regarding Ardent's valuation of the Objector's property. Following the submission of the objection,

the Council and JLL met with the objector on 12 August 2025 to discuss the objector's concerns.

12.7.10 The Council considers that it has carried out extensive engagement with all interest holders and that that the claim that the Council has not meaningfully consulted and engaged is without merit.

12.7.11 As set out at section 10 of this Statement, a full EqIA was undertaken and which highlights how the Council has sought to deliver positive impacts and mitigate negative impacts on protected characteristics, having regard to the Public Sector Equality Duty (PSED) (**CD 7.7**). The positive impacts of the Scheme are noted at 7.9 of the EqIA (**CD 5.10**). It is concluded that the overall impact of the Scheme on those with protected characteristics is positive (section 10.8 of this Statement) though the EqIA and Council acknowledge that there will be negative impacts 'particularly for older people, disabled people and those with specific health conditions' (section 10.5(a) and 10.7 of this Statement and sections 7.5-7.6 of EqIA (**CD 5.10**)). The Council has put in place various measures to mitigate the impacts on people with these characteristics, including:

(a) a commitment to arrange all moves as single moves where possible;

(b) 10% of new homes are to be accessible;

(c) increased number of homes will be designed to Category 2 standard for accessibility.

12.7.12 The Council is committed to working with vulnerable residents to seek to mitigate the impacts of the regeneration and to ensure that they are offered suitable replacement homes. The Objector has also been invited to discuss any specific concerns they have and which they wish the Council to take into consideration.

13 Details of Contacts for Further Information

13.1 Those parties affected by the Order who wish to discuss matters with a representative of the Council should contact:

13.1.1 Monju Ali, Regeneration and CPO Co-Ordinator, monju.ali@towerhamlets.gov.uk or on +44 (0)7855 216 927 during normal office hours; or

13.1.2 clichyestate@towerhamlets.gov.uk

13.2 A copy of the Order, the Order Map, and the Core Documents may be viewed at:

13.2.1 Tower Hamlets Council, Town Hall, 160 Whitechapel Road, London E1 1BJ (Monday to Friday) and may be seen at all reasonable hours;

13.2.2 A redacted copy of the order and map may be viewed online at https://talk.towerhamlets.gov.uk/hap and https://www.towerhamlets.gov.uk/lgnl/council_and_democracy/consultations/Housing-consultations/HAP_Houses.aspx

14 **List of Core Documents**

14.1 The Council may refer to the documents listed in the table below at the public inquiry. The below is not exhaustive and the Council may refer to additional documents in order to address any objections made to the Order.

14.2 Electronic or hard copies of these documents can be provided on request. To request copies please contact Monju Ali at monju.ali@towerhamlets.gov.uk or clichyestate@towerhamlets.gov.uk

Ref:	Document	Date
CD 1 Harriott House, Apsley House, Pattinson House Compulsory Purchase Order and Accompanying Documents		
CD 1.1	The Order and Schedule	15 April 2025
CD 1.2	The Order Map	14 April 2025
CD 1.3	The Statement of Reasons and appendices	April 2025
CD 1.4	The Statement of Case	September 2025
CD 2 Committee Reports, Cabinet Reports and Authorisations		
CD 2.1	London Borough of Tower Hamlets Report	23 September 2020
CD 2.2	London Borough of Tower Hamlets Cabinet Report	24 November 2021
CD 2.3	London Borough of Tower Hamlets Cabinet Report	15 December 2021
CD 2.4	London Borough of Tower Hamlets Cabinet Report	31 January 2024
CD 2.5	Development Committee report	12 June 2024
CD 2.6	London Borough of Tower Hamlets Cabinet Report	16 October 2024
CD 2.7	Secretary of State Approval: Appropriation	29 October 2024
CD 3 Planning Policy and Guidance Documents		
CD 3.1	National Planning Policy Framework	12 December 2024 (updated 7 February 2025)
CD 3.2	The London Plan	March 2021
CD 3.3	London Borough of Tower Hamlets Local Plan 2031	15 January 2020
CD 3.4	Ministry of Housing, Communities & Local Government, Guidance on the Compulsory Purchase Process	31 January 2025
CD 3.5	Ministry of Housing, Communities & Local Government, Compulsory Purchase and	December 2021 (updated October 2023)

	Compensation: Guide 4 - compensation to residential owners and occupiers	
CD 3.6	Better Homes for Local People: the Mayor's Good Practice Guide to Estate Regeneration (GPGER)	February 2018
CD 3.7	Mayor of London's Housing Supplementary Planning Guidance	March 2016 (updated August 2017)
CD 3.8	London Borough of Tower Hamlets Strategic Plan 2022-2026 (the first 1,000 homes programme)	2022
CD 4	**Planning Permissions and Supporting Documents**	
CD 4.1	The 2023 Permission (ref: PA/21/02703)	9 August 2023
CD 4.2	The Planning Permission (ref: PA/24/00368)	27 June 2025
CD 4.3	PA/24/00368 – Site Location Plan	1 March 2024
CD 4.4	Planning application proposed phasing plan	1 March 2024
CD 4.5	Statement of Community Involvement	February 2024
CD 4.6	Financial Viability Assessment: Redloft	March 2024
CD 5	**Other documents**	
CD 5.1	Introduction Letter and Invitation to Consultation	20 June 2019
CD 5.2	Landlord Offer	28 February 2020
CD 5.3	Letter to residents: Consultation programme	28 February 2020
CD 5.4	Invitation to Consultation	27 August 2020
CD 5.5	Rehousing guide for resident leaseholders	May 2023
CD 5.6	Invitation to Consultation	December 2023
CD 5.7	Invitation to Consultation	12 February 2024
CD 5.8	Appropriation Plan	7 March 2025
CD 5.9	Indicative Stopping Up Order plan	Undated
CD 5.10	Equalities Impact Assessment	March 2025
CD 6	**Housing Needs**	
CD 6.1	Tower Hamlets Local Housing Needs Assessment	October 2023
CD 6.2	GLA's Housing in London 2024 Report	November 2024
CD 7	**Legislation**	
CD 7.1	Town and Country Planning Act 1990 (section 226)	

CD 7.2	The Local Government Act 1972 (section 122(1))	
CD 7.3	Housing and Planning Act 2016 (section 203)	
CD 7.4	Land Compensation Act 1961 (sections 5 and 6)	
CD 7.5	Planning and Compulsory Purchase Act 2004 (section 38(6))	
CD 7.6	Human Rights Act 1998 (Schedule 1 The Articles)	
CD 7.7	Equality Act 2010 (sections 4 and 149)	