The London Borough of Tower Hamlets Compulsory Purchase Order 2025 (APP/PCU/CPOP/E5900/3365599)

Proof of Evidence of Brian Pote-Hunt

dated 18 November 2025

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1 INTRODUCTION

1.1 Qualifications and experience

1.1.1 I, Brian Pote-Hunt, am a Director at Ottaway Strategic Management (**Ottaway**). I have been in this position since 2001. In my role I have oversight of all the work that Ottaway undertakes and have been the Managing Director since the company's inception in 2001. I previously worked in local government as the Strategic Head of Regeneration and Community Partnerships at the London Borough of Sutton, where I had responsibilities for Equality and Diversity and have worked in similar roles as a consultant as the Interim Head of Equalities at Liverpool City Council and in the Equalities Team at the Office of the Deputy Prime Minister. I was also formerly employed within the Race Equality Unit and the Greater London Council. Accordingly, I have widespread experience in both Equalities and Regeneration and have worked in this industry for approximately 30 years.

1.1.2 This Proof of Evidence is made in support of the London Borough of Tower Hamlets (Harriott, Apsley and Pattison Houses) Compulsory Purchase Order 2025 (the **Order**) **[CD 1.1]**. The Order is required to facilitate the regeneration of the estate which contains Harriott House, Apsley House and Pattison House (the **HAP Houses**) and the Redcoat Community Centre and Mosque (the **Estate**). The proposed redevelopment of the Estate comprising 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 is referred to in this Proof of Evidence as the **Scheme**.

1.1.3 The facts set out in this Proof of Evidence are within my own knowledge and are true to the best of my knowledge and belief. Where reference is made to facts which are outside my knowledge, I set out the source of my information, and I believe such information to be true.

1.1.4 I have been assisted by other professional advisors and officers of the London Borough of Tower Hamlets (the **Council**) with the preparation of this Proof of Evidence, some of whom will also provide evidence to the inquiry. However, all opinions expressed are my own.

1.2 Involvement with the Scheme

1.2.1 I have been working on the Scheme as part of my role at Ottaway since January 2021. My role involves the coordination, research, analysis and drafting of the Equalities Impact Assessment (the **EqIA**) **[CD 5.10]** from inception to completion. I was involved in both the initial drafting and later refreshing of the EqIA between 2021 and 2025.

1.2.2 Throughout my time working on the Scheme, I have been working alongside Abad Uddin and James Walsh at the Council, as well as Monju Ali (Housing Regeneration Team) and Una Bedford (Strategy, Policy, Intelligence and Performance for key local data). Within Ottaway, for this project, Subiya Price-

Kennedy (Population data analysis) and Martin King (Resident researcher) supported me.

2 SCOPE OF EVIDENCE

I set out the following in my evidence:

2.1 an introduction to the EqIA **[CD 5.10]** that was prepared to support the Scheme which included:

2.1.1 the relevant legal position behind the EqIA including the Equality Act 2010 (**EA 2010**) and the Council's Public Sector Equality Duty (**PSED**);

2.1.2 the Ministry of Housing, Communities & Local Government's "Guidance on the Compulsory Purchase Process" (2025) **[CD 3.4]** (the **Guidance**) advising that all public sector acquiring authorities are bound by the Public Sector Equality Duty;

2.1.3 the methodology used in completing the EqIA;

2.1.4 the outcomes of the EqIA including the short-, medium- and long-term impacts of the Scheme;

2.1.5 the generic and specific mitigating actions set out in the EqIA;

2.1.6 conclusion, stating that the focus of the EqIA was to identify negative and positive impacts of the Scheme and to distinguish between those impacts that are universal to those living in and or adjacent to the site and those with a disproportionate or differential effect on those with protected characteristics. The EqIA identified aspects of the Scheme that required actions to mitigate potential negative impacts. These were set out as recommendations in the report. An action plan supporting the completion of these mitigating actions was also provided and the Council adopted this action plan; and

2.2 specific equality focused responses to objections which raise issues relevant to an equality response.

3 EQUALITY AND HUMAN RIGHTS IMPACT ASSESSMENT

3.1 Introduction

3.1.1 This section provides details in respect of how the Council has had regard to its PSED in respect of the Order. It describes relevant law and guidance that have informed the Council's and my approach to equalities, describes how the EqIA **[CD 5.10]** was produced and summarises its outcomes.

3.1.2 In developing an EqIA the Council have sought to understand where, in particular, any possible negative / disproportionate equality impacts may arise from the Scheme so that the Council can fulfil its PSED, by either changing the Scheme or putting in place mitigating actions to address these impacts. Ottaway completed the work described below to draft the EqIA produced in 2021 and then refreshed the report initially in 2023, followed by a further refresh in 2025.

3.1.3 An action plan was developed as part of the EqIA. In signing off the EqIA, the Council adopted this action plan. In fulfilling the action plan and in addressing the mitigations of any negative impacts, the Council is better placed to address its PSED. As independent consultants, we were mindful that this should be set out in a way which enables the Council to be best informed as to how to deliver on the identified mitigation.

3.2 Equalities

3.2.1 Compulsory purchase orders are used to acquire land without the owner's consent, often to facilitate redevelopment or infrastructure projects.

3.2.2 The Guidance **[CD 3.4]** advises that all public sector acquiring authorities are bound by the PSED as set out in section 149 of the EA 2010 **[CD 7.7]** and states:

"*Throughout the compulsory purchase process, acquiring authorities must have due regard to the need to: (a) eliminate unlawful discrimination, harassment, victimisation; (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it. In performing their public functions, acquiring authorities must have due regard to the need to meet these three aims of the Equality Act 2010.*

For example, an important use of compulsory purchase powers is to help regenerate run-down areas. Although low income is not a protected characteristic, it is not uncommon for people from ethnic minorities, the elderly or people with a disability to be over-represented in low income groups. As part of the Public Sector Equality Duty, acquiring authorities must have due regard to the need to promote equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This might mean that the acquiring authority devises a process which promotes equality of opportunity by addressing particular problems that people with certain protected characteristics might have (e.g. making sure that documents are accessible for

people with sight problems or learning difficulties and that people have access to advocates or advice)."[1]

3.2.3 In addressing the needs of its communities, I understand that the Council is committed to undertaking equality impact assessments of its policies and services to ensure that this duty is fulfilled. The consenting and delivery of the Scheme is subject to this general duty and so the Council commissioned Ottaway to undertake an independent EqIA.

3.3 Equality Impact Assessment

3.3.1 Methodology

(a) The Council's equality assessments are a self-assessment tool, used to help it look at the positive and negative impacts of its own work on staff, citizens, partners and communities regarding equality of opportunity, and promoting diversity in employment and service delivery.

(b) The Council's borough (the **Borough**) is one of the most diverse boroughs in the country and its approach to equality is expressed through an ambition of fairness and the guiding values of equal opportunity and social justice. The protected characteristics included within the EA 2010 **[CD 7.7]** were reviewed in the EqIA **[CD 5.10]**. In addition, as part of this EqIA a further three additional characteristics were assessed, being Health, Socio Economic and Language. These were included in the EqIA as, following discussions with the Council, it was felt that socio-economic needs were present on the Estate and diverse languages spoken, and the Council was interested in understanding both of these, as well as the needs of people from a health perspective, all of which added granularity to the assessment.

(c) The list below sets out the protected characteristics and the additional local priority characteristics that were assessed in this EQIA:

- *Age*
- *Disability*
- *Gender transition*
- *Marriage and Civil Partnership*
- *Pregnancy and Maternity*
- *Race*
- *Religion and Faith*
- *Sex (Gender)*
- *Sexual Orientation*
- *Health*
- *Socio Economic*
- *Language*

(d) From a methodological perspective the EqIA **[CD 5.10]** focused on addressing:

i likely regeneration programme impacts (universal and generic);

[1] Ministry of Housing, Communities & Local Government's "Guidance on the Compulsory Purchase Process" (2025), Tier 1, "General Overview", paragraph 6.

ii likely / expected equality impacts (i.e. impacts on protected characteristics/local priorities);

iii direct equality impacts;

iv indirect equality impacts; and

v proportionality of impact across protected characteristics/local characteristics including proportion, and disproportion, thereby assessing proportional positive impacts and negative impacts and/or disproportional positive and negative impacts.

(e) As part of this process, it was critical to enable the Council to understand the actions it would need to undertake to address the outcomes of the assessment. The analysis undertaken would enable a process of highlighting these impacts, which in turn would enable the Council to choose options for the mitigation of negative impacts.

(f) The work of delivering this EqIA incorporated: desk and literature research, the collation and analysis of local equalities data (population, housing register/waiting lists and those in temporary accommodation in the Borough), and the design and oversight of primary research targeting the equality and diversity profile of the residents of the HAP Houses.

(g) Through this data we reviewed the protected characteristics that are present within HAP Houses and assessed the equality impacts (both positive and negative) that are likely to manifest through the Scheme. We identified both positive and negative impacts and supported the Council in identifying actions it can undertake to mitigate the negative impacts.

(h) The work of completing the EqIA **[CD 5.10]** started in 2020 and included:

i an inception meeting with the Council;

ii review of the background information, reports and resident communications;

iii familiarisation with the Estate;

iv review of published demographics (equality profile) data (initially the 2011 census data for the ward, later updated in subsequent EqIA refreshes once the 2021 census data was published by the Office of National Statistics (**ONS**));

v review of the Council's housing waiting list and temporary accommodation data (updated at each refresh);

vi design of a resident survey to seek equalities details of households within the Estate;

vii telephone and face to face interviews with residents;

viii compilation and analysis of survey findings;

ix drafting of the equalities data collated and analysis of the data research;

x development of the equalities focus in the Scheme;

xi completion of the EqIA;

xii development of mitigation for 'negative' impacts identified; and

xiii development of an action plan to mitigate likely negative impacts.

(i) As set out above, resident surveys were completed to support the EqIA **[CD 5.10]**. In total seventy-two surveys were completed from the one hundred households within the Estate. Of the objectors (or former objectors) to the Scheme, surveys were secured from the properties associated with Objectors 2a and 2b, Objectors 3a and 3b, former Objector 4 and former Objector 5 (Objections 4 and 5 have now been withdrawn). There was no survey taken in respect of Objector 1's property, as whilst that unit was approached on approximately 5-6 occasions, including on weekday evenings and at the weekend, no one opened the door to take part in a survey. However, I am advised that Objector 1, has not raised any objections in respect of the EqIA at the date of drafting this Proof.

(j) The survey's field work started with telephone surveys in January 2021 and face to face surveys at the end of February through to early March 2021. This was during the Covid 19 pandemic, with the research being completed before the second lock down on 21st March 2021. Our survey team, when on site, wore PPE (masks) and residents completing doorstep interviews also wore PPE. The survey findings were analysed on 9 March 2021.

3.3.2 **Outcome of the EQIA**

(a) Set out below are the key positive, negative and neutral impacts of the Scheme, based on short term impacts and medium to long term impacts. The full range of identified impacts are stated in the EqIA and include those set out in the summary below.

(b) Short term construction and environmental focused impacts include:

i 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;

ii the short-term changes to play space provision are expected to have a **negative impact** specifically for younger people;

iii 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

iv in the short term, the changes to housing provision are expected to have a **neutral impact**, particularly as the Council is looking to arrange for moves to new properties to take place as a single move, where possible. This would if achieved, somewhat mitigate the negative impacts of decant for older and disabled residents, and those with health conditions.

(c) Medium to long terms impacts include:

i the housing needs of a wide range of protected characteristics will be **positively** enhanced through the development of these new units, providing opportunities for housing;

ii the housing register in the Borough has significantly more people from diverse communities when compared with the population profile of the Borough, many of whom are likely to **benefit** from this regeneration Scheme;

iii once the process is completed the new replacement housing is expected to have a **positive impact** for all the protected characteristics represented within HAP Houses;

iv the upgraded and improved social infrastructure provided as part of the Scheme is expected to have a **positive impact** for young**,** older and disabled residents, those with health conditions and pregnant and/or young mothers;

v the improved opportunities for social interaction provided as part of the Scheme are expected to have a **positive impact** for young**,** older and disabled residents, those with health conditions and pregnant and/or young mothers;

vi the improved and expanded play space provided as part of the Scheme is expected to have a **positive impact** for young residents;

vii the community facilities provided as part of the Scheme are expected to have a **positive impact** for young**,** older and disabled residents;

viii the improved access to the Estate is expected to have a **positive impact** for young**,** older and disabled residents and pregnant and/or young mothers;

ix there will be more homes designed to a category 2 standard[2] for accessibility which is broadly equivalent to 'lifetime homes' standards. 10% of homes will be built for people with a disability which will have a **positive impact** for older and disabled residents;

x improving the housing stock will provide homes to higher standards and hence improve the quality of accommodation for residents currently on

[2] Category 2 means a home must be accessible to most people and able to suit older people, those with reduced mobility and some wheelchair users, and is estimated to cost developers an extra £1,400 per home. Requirements include level access front and rear doors, an entrance level bathroom, kitchen and dining area and low height windows.

the Estate, potentially having a **positive impact** on residents' health and wellbeing;

xi the planning obligations will provide economic benefits to the local community; and

xii energy efficient design and improved sustainability should have a **positive impact** of lower running costs for new homes.

(d) The report identified that the regeneration of the Estate will have generic impacts for the whole community. However, equality impacts are likely to be concentrated through the protected characteristics of disability, age, pregnancy and maternity and the related characteristics of health, socio-economic inequality and language.

(e) The implications of the regeneration on disabled people, older and younger people on the Estate is likely to be the most significant, both in terms of health and access to amenity provision. Cost implications of the regeneration have also been highlighted, and these are to do with the regeneration process, for example costs of moving from the old property and resettlement into the new home. In terms of those costs, the Council intends to cover all reasonable costs associated with moving to the new home for secure tenants and resident leaseholders. Moreover, the Council's Landlord Offer **[CD 5.2]** seeks to protect older leaseholders who may not be able to renew a mortgage with a variety of options.

(f) The impact of the regeneration process will have a significant bearing on leaseholders both resident and non-resident as the Scheme will require the compulsory purchase of their properties if voluntary settlements cannot be achieved.

(g) In some cases, those with less disposable income may have difficulty with maintaining leaseholder status if they decide to stay on the Estate. This has been addressed through the leaseholder guarantees, which provide alternative options of shared equity and shared ownership arrangements. The Council will support the housing needs of private tenants displaced through the repurchase of lease holder properties, if they are on the housing register and are in bands 1 and 2. The remaining private tenants will be able to access housing advice or have their housing options assessed, and I understand that the Council has been in contact with these private tenants.

(h) Set out below are the key actions recommended as mitigation for negative impacts as part of the EQIA **[CD 5.10]**. Within the full EqIA these actions were put into an action plan laid out in section 9 of that report.

3.3.3 **Generic Mitigation Actions**

(a) Run EQIA briefing sessions, review training needs, and establish training where appropriate.

(b) Establish training where appropriate equality training / briefing / workshops for housing regeneration liaising teams.

3.3.4 **Disability Mitigation Actions**

(a) Arrange relevant occupational therapy (**OT**)/social services assessments for residents where identified.

(b) Liaison with social care teams in other authorities where residents are seeking to move outside of the Borough.

(c) Work with residents with complex disability and or health needs and provide services accordingly.

(d) Support with adaptations in new units on the regenerated estate.

(e) Commission a repair person service to support additional fixtures and fittings.

(f) Ensure reasonable adaptations are implemented within the new homes in line with OT assessments.

(g) Ensure that disability grants are reviewed and that residents with specific need for support are provided with access to funding opportunities.

3.3.5 **Age Mitigation Actions**

(a) Engage young people in the design of the future amenity space within the regenerated Estate. Ensure existing amenity space is retained where feasible and safe, during the regeneration and construction.

(b) Provide opportunity for independent financial advice for any resident needing it.

(c) Commission handy person services to support additional fixtures and fittings.

(d) Support older leaseholders to access the right options.

(e) Preventing where possible more than one decant for older people in the development process.

(f) Engage social services to ensure that modifications and or care needs of older people are accounted for.

(g) Ensure that the shared ownership option for older people will allow them to transfer the equity from their property, should they die, to their relatives/spouse.

3.3.6 **Socio-economic Mitigation Actions**

(a) The Council to monitor the potential for a consequential rise in the costs associated with the new properties both in terms of living costs and in terms of rent/mortgages.

(b) Private tenants will be rehoused if they are on the housing register and if they are in bands 1 and 2. The remaining private tenants will be signposted to the relevant housing options team/service and provided with information as to what their housing options are.

(c) The Council to monitor how the proposals affect older leaseholders or leaseholders with reduced financial capacity.

(d) Facilitate access to independent financial advisors for all residents.

3.3.7 **Language Mitigation Actions**

Make alternative formats, translation and interpretation provision available when specific tenant engagement, leaseholder negotiation and wider off-site consultations are undertaken.

3.3.8 **Health Mitigation Actions**

Undertake health and medical assessment or OT assessments where required.

3.3.9 **Intersectionality Mitigation Actions**

Develop enrichment activities for residents of the Estate designed to rebuild communities.

3.4 **Conclusion**

The focus of the EqIA **[CD 5.10]** was to identify negative and positive impacts of the Scheme and to distinguish between those impacts that are universal to those living in and or adjacent to the site and those with a disproportionate or differential effect on those with protected characteristics. The EqIA identified aspects of the Scheme that required actions to mitigate potential negative impacts. These were set out as recommendations in the report. An action plan supporting the completion of these mitigating actions was also provided and I understand that the Council adopted this action plan.

4 RESPONSE TO OBJECTORS

In this Section, I set out responses to the objection which refers to equalities.

4.1 Objectors 2a and 2b [CD 8.3 and 8.4]:

4.1.1 *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.*

4.1.2 *Response:*

(a) In terms of the regeneration Scheme, and in particular the compulsory purchase process and the construction and development process, the EqIA **[CD 5.10]** identified that the redevelopment has the potential to disproportionately impact vulnerable groups including older people, children and families, and households with socio economic needs.

(b) Given the nature of the Scheme, the Council has paid attention to the displacement of existing residents. The Council has pro-actively engaged with the existing residents throughout the whole process (detailed in the Proofs of Evidence of Monju Ali and Tim Surry [**CD 10.1** and **10.3** respectively]). A decant strategy, including rehousing residents has been secured which mitigates against any adverse impact to the existing leaseholders and secure tenants' housing situation.

(c) Additionally, the EqIA suggested proposed mitigation to address negative impacts resulting from the construction and development proposals for the site, including for vulnerable groups mentioned in the objection. Indeed, an action plan was established within the EqIA which I understand that the Council has adopted.

(d) The proposed new residential accommodation would meet inclusive design standards and 34 of the new homes would be wheelchair accessible with 24 being within the affordable rented tenure and 10 within the private units (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.

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

(f) In my opinion, the Scheme would not result in the adverse impacts upon equality or social cohesion.

4.2 Conclusion

4.2.1 I have been working on the Scheme since 2021. My role at Ottaway has involved the preparation and completion of the EqIA. Throughout my time working on the Scheme our key focus has been to ensure that the Council meets its PSED. Moreover, it has been important to distinguish between regeneration impacts that

are universal and those impacts that are specific to or disproportionately/differentially affect those with protected characteristics.

4.2.2 Through the EqIA findings an action plan was drafted. The Council has adopted this action plan and is now working to deliver its actions.

4.2.3 In my professional opinion I believe that the Council has had proper regard to equalities issues and complied with its PSED.

5 STATEMENT OF TRUTH AND DECLARATION

5.1 Statement of Truth

I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

5.2 Declaration

I confirm that my report has drawn attention to all material facts which are relevant and have affected by professional opinion.

I confirm that I understand and have complied with my duty to the inquiry as an expert witness which overrides any duty to those instructing or paying me, that I have given my evidence impartially and objectively, and that I will continue to comply with that duty as required.

I confirm that I am not instructed under any conditional or other success based fee arrangement.

I confirm that I have no conflicts of interest.

I confirm that I am aware of and have complied with the requirements of the rules, protocols, and directions of the inquiry.

Signed: Dated: 18 November 2025

Brian Pote-Hunt, Ottaway Strategic Management Limited