

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

DOCUMENT SoCG OBJ02

**STATEMENT OF COMMON GROUND:
ACQUIRING AUTHORITY AND AHMET DELLAL
(OBJECTOR NO. 2)**

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

ACQUIRING AUTHORITY AND AHMET DELLAL: STATEMENT OF COMMON GROUND

Areas of agreement and disagreement

No.	Issue	Agreed?	If Issue Not Agreed / Comments	
			Acquiring Authority's Position	Objector's Position
1.	Mr Dellal's property lies within the proposed area of public realm situated between Plot E and Plot C of the Scheme.	Yes	As per Issue column.	As per Issue column.
2.	Mr Dellal's objection is made by him, in his capacity as freehold owner of 739 High Road, Tottenham. It is not made on behalf of any other parties.	Yes	As per Issue column.	As per Issue column.
3.	All points set out in Mr Dellal's objection.	No	The Acquiring Authority's position in relation to Mr Dellal's objection is set out from page 63 of its Statement of Case.	Mr Dellal's position remains as set out in his objection, and no further evidence has been submitted.
4.	<p><u>Contact and negotiations:</u> the Acquiring Authority and Lendlease have engaged with Mr Dellal since 2018. Mr Dellal received a number of letters from the Acquiring Authority and Lendlease between 2018 and May 2022.</p> <p>Mr Dellal received further letters on 17 May 2022 and 12 August 2022 within which the Acquiring Authority and Lendlease confirmed that they wanted to acquire Mr Dellal's interests in the Order Land.</p> <p>Mr Dellal did not respond to any of these letters to discuss the potential acquisition of his interest in the property.</p> <p>CBRE sought to engage with Keith Murray</p>	No	As per Issue column	<p>Mr Dellal's position is that he did not receive a number of letters from the Acquiring Authority and Lendlease between 2018 and May 2022.</p> <p>Mr Dellal's position is that there has been only one substantive engagement letter received from the Acquiring Authority during that period, and this communication occurred in February 2022.</p> <p>Mr Dellal's position remains that he is open and willing to engage in negotiations with the Acquiring Authority and Lendlease, however there has been only one formal dialogue over a five-year duration. Mr</p>

	<p>Consultants during April and May 2023. On 9 June 2023 Mr Dellal was contacted with an update on communications with his tenant.</p> <p>On 20 June 2023 a formal offer to purchase his property was made to Mr Dellal and which Mr Dellal rejected on 21 June 2023. The offer was rejected on the basis that the amount proposed was too low to warrant negotiation.</p> <p>CBRE emailed Keith Murray Consultants and Mr Dellal on 14 July 2023, and Keith Murray Consultants responded to confirm that matters could not be taken forward at this time.</p>			<p>Dellal is of the view that this demonstrates a notable deficiency in taking reasonable steps to secure an agreement.</p> <p>Mr Dellal considers that the Acquiring Authority and Lendlease have not fulfilled the obligation to take reasonable measures to acquire the property and land before resorting to the Order, as required in paragraph 2 of the CPO Guidance.</p>
5.	The Scheme will significantly contribute to the economic and environmental well-being of the Acquiring Authority's area.	Yes	The Acquiring Authority's position is set out in its Statement of Case, including the benefits at Section 9. The Acquiring Authority considers there will also be substantial social well-being benefits.	Mr Dellal's objection is on the basis that the Scheme will not contribute to the social well-being of the Order Land, and that objection is maintained.
6.	Mr Dellal does not trade from the property at 739 High Road, which is leased to a separate business.	Yes	As per Issue column.	As per Issue column.
7.	The objection does not refute that in order to be brought forward the Scheme requires vacant possession of the objector's property. Mr Dellal's concerns relate to the timing of the Order.	Yes	As per Issue column.	As per Issue column.
8.	The objection does not identify any specific ways in which the Acquiring Authority has not complied with its duties in section 149 of the Equality Act 2010, nor any impacts which will arise from the Scheme and disproportionately impact those with protected characteristics.	Yes	As per Issue column.	As per Issue column.

Signed: [REDACTED]

Date: 18/09/2023

On behalf of the Acquiring Authority

Signed: [REDACTED]

Date: 15/09/2023

On behalf of Ahmet Dellal