



Mr R Clegg
The Planning Inspectorate
c/o Gateley Hamer
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Birmingham
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Transport for London
Business Services

Property Services

7G7 Palestra
197 Blackfriars Road
London SE1 8NJ

27 July 2023

By email only to joanna.vincent@gateleyhamer.com

Dear Mr Clegg,

**The London Borough of Haringey (High Road West Phase A) Compulsory
Purchase Order 2023
Objection from Transport for London (TfL)**

I write further to the pre-inquiry meeting that took place on Tuesday 11 July 2023 and for which a note of the meeting was sent to me by email on Friday 21 July 2023. TfL did not attend the pre-inquiry meeting in order to manage resource and time spent on this matter.

I wanted to clarify some points arising from the note of the pre-inquiry meeting:

- Paragraph 16 states that none of the parties present at the meeting were aware of anyone else (other than parties present) who may wish to appear at the inquiry. I wanted to confirm TfL's position. TfL is having productive meetings with the acquiring authority and developer and is negotiating a number of agreements namely a Compromise Agreement; Asset Protection Agreement and; Licence. It is hoped that outstanding issues on these agreements will be resolved to enable TfL's objection to be withdrawn. However, until that occurs, TfL reserves the right to submit evidence to the Inspector and appear at the inquiry. If TfL do appear at the inquiry, then they will be represented by a surveyor, an engineer and a legal representative, the names of whom will be confirmed closer to the inquiry.
- Paragraph 25 requests that other objectors intending to appear at the inquiry submit a statement of case by 25 August 2023. At paragraph 32, the summary of key dates provides that statements of case are sought from only objectors 3 and 11. TfL do not view the provision of a statement of case at this stage as a useful allocation of time and resource as efforts are concentrated on entering into an agreement and removing the need for TfL to

participate further in the inquiry process. I would therefore be grateful for confirmation as to whether the note of the pre-inquiry meeting constitutes a notice in writing under Rule 7(3) for TfL to provide a statement of case by 25 August 2023, noting TfL's preference not to provide such a statement. The note of the pre-inquiry meeting also only provides TfL with 5 weeks' notice to potentially be required to submit a statement of case during a period in which a number of relevant employees have annual leave.

- Paragraph 26 requests parties to consider the preparation of a statement of common ground by 15 September 2023. TfL will liaise with the acquiring authority to consider whether it would be appropriate for a statement of common ground to be submitted in respect of TfL. If such a statement is submitted, TfL's preference would be to summarise those issues that are outstanding, rather than those that are agreed.

I look forward to hearing from you.

Yours sincerely



Maxine Greaves
Principal Surveyor



Brenda Taplin

From: Brenda Taplin
Sent: 01 August 2023 15:51
To: Maxine Greaves
Cc: Joanna Vincent
Subject: RE: The London Borough of Haringey (High Road West Phase A) Compulsory Purchase Order 2023 - Objection from Transport for London

Hello Maxine

The Inspector has asked me to reply to your letter of 27 July 2023, written in response to the note of the pre-inquiry meeting. The paragraph numbers below relate to that note.

Paragraph 16

The Inspector notes that TfL is involved in negotiations which it is hoped will enable the objection to be withdrawn. If that does not prove to be the case, the objection will be able to be pursued at the inquiry. Please clarify who should be recorded as the objector in respect of Objection 6. The objection which you submitted on 7 March 2023 states that it is a representation from Rail for London Ltd, but it appears to have been sent from the offices of Transport for London and your letter of 27 July refers to Transport for London and not to Rail for London.

Paragraph 25

The request for further statements of case applies to those objectors who were known, at the date of the pre-inquiry meeting, to be intending to appear at the inquiry, that is Objectors 3 and 11. The note of the pre-inquiry meeting does not constitute a notice under Rule 7(3) to either Transport for London or Rail for London to provide a statement of case.

Paragraph 26

The preparation of a statement of common ground with the Acquiring Authority would be welcomed. The Inspector notes your preference that such a statement should concentrate on issues which remain outstanding, but it would also be helpful for the parties to be clear about the matters on which agreement has been reached.

Please note that I am intending to send a copy of this exchange of correspondence to the LB of Haringey as Acquiring Authority and to add to Objectors' correspondence on the Inquiry website (Objector 06).

Brenda

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