

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

DOCUMENT SoCG OBJ11

**STATEMENT OF COMMON GROUND:
ACQUIRING AUTHORITY AND MARY POWELL
(OBJECTOR NO. 11)**

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

ACQUIRING AUTHORITY AND MARY POWELL: 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.	All points set out in Ms Powell's objection.	No	<p>The Acquiring Authority's position in relation to Ms Powell's objection is set out from page 91 of its Statement of Case.</p> <p>The Acquiring Authority will respond to Ms Powell's objection and recent Statement of Case in its proofs of evidence.</p>	Ms Powell's objection remains, and has been supplemented by the Statement of Case submitted on 16 August 2023.
2.	<p>Contact and negotiations with Ms Powell – the Acquiring Authority wrote to Ms Powell in November 2021, March 2022, November 2022, and January 2023 with the aim to commence negotiations to acquire her leasehold interest at 63 Whitehall Street. Ms Powell did not respond to those letters.</p> <p>The Acquiring Authority contacted Ms. Powell by email on 24 April 2023 seeking a meeting, and Ms Powell responded on 28 April 2023 to confirm that she was not in a position to meet for the time being.</p> <p>The Acquiring Authority replied on 16 May 2023 including a without prejudice offer to purchase Ms Powell's leasehold interest. Further without prejudice correspondence has been held between the two parties since that time.</p>	No	As per Issue column.	<p>Ms Powell does not accept that the Acquiring Authority attempted to contact Ms Powell to progress meaningful negotiations.</p> <p>Ms Powell considers that the letters received between November 2021 and January 2023 were general invitations to get in touch with the Acquiring Authority, and that these put the onus on Ms Powell to open a negotiation for an outcome Ms Powell was not seeking (i.e. to vacate her home).</p> <p>Ms Powell considers the first attempt from the Acquiring Authority to negotiate about specific terms for purchase of her property was 16 May 2023.</p>

No.	Issue	Agreed?	If Issue Not Agreed / Comments	
			Acquiring Authority's Position	Objector's Position
3.	There is a need for regeneration of those parts of the Order Land located to the north of Whitehall Street (i.e. those parts of the Order Land which would still be regenerated under Ms Powell's alternative proposal, at point 2 of her Statement of Case).	No	As per Issue column. The Acquiring Authority considers that there is a need for regeneration of all of the Order Land.	Ms Powell does not accept that there is a need for purchase of the land south of Whitehall Street for the purposes of regeneration.
4.	An equity loan for a new property within the Scheme or elsewhere in the borough has been offered to Ms Powell by the Council and remains available pursuant to the Love Lane Leaseholder Offer. Ms Powell has confirmed that she is not interested in the equity loan option.	No	As per Issue column.	Ms Powell does not accept that shared equity is a reasonable offer by the Acquiring Authority. Ms Powell considers shared equity would reduce her leasehold rights whilst having the same financial obligations that she has now, as well as reducing her rights to bequeath the property. Ms Powell considers this a form of financial servitude or legitimised loan sharking.

Signed:...



Date:.....6 October 2023

On behalf of the Acquiring Authority

Signed:.....



Date:.....06/10/2023.....

On behalf of Mary Powell