

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

ACQUISITION OF LAND ACT 1981

COMPULSORY PURCHASE (INQUIRIES PROCEDURE) RULES 2007

REBUTTAL TO OVERVIEW PROOF OF EVIDENCE BY PETER O'BRIEN (WITNESS 1)

On Behalf of Mary Powell (Objection 11)

31 October 2023

Rebuttal - Witness 1 Peter O'Brien

Mr O'Brien at paragraph 15.93 in his overview refers to a list of correspondence which he claims I should have received and responded to, but has not provided copies of in his evidence. I have the following concerns with this list:

1. I am generally careful to retain copies of correspondence and have attempted to locate the items described by Mr O'Brien. I am able to trace emails back to January 2018 which is when I upgraded IT equipment. I cannot easily locate copies of email traffic before this date.
2. I was unable to locate a paper copy of the letter which is meant to have been sent to me on 6 October 2016; however, in his appendices he gives a different date, 10 June 2016 (page 128 of appendices). I also cannot locate a paper copy of a letter thus dated.
3. I have been able to locate a screenshot of the letter dated 3 April 2018 which is pasted at the end of this document (Exhibit 1). This shows the logos of Lendlease and Haringey Council with equal prominence so it is not clear which organisation it is from. The letter greeting is "Dear Neighbour" and no individual recipient address is at the top. It is signed off by a Richard Fagg but does not indicate who he works for. The letter makes no reference to opening negotiations to purchase my home.
4. I have been unable to locate paper or email copies of the letters that the council claims to have sent to me in November 2021, March 2022 and November 2022.
5. I have already stated the PDF copy of the letter dated November 2022, sent to me on an email on 16 May 2023, appeared to have been created on 2 May 2023. This was visible in the document properties, which I have pasted as a screenshot at the end of this document (Exhibit 2).
6. Mr O'Brien states that the letter sent to me in January 2023 received no response. However, this was the letter which included the statutory information about how to lodge an objection to the Compulsory Purchase Order. I lodged that objection with the Department of Levelling Up, Housing and Communities on 6 March 2023. I notified the council that I had done so, and I believe I have therefore responded clearly to that letter.
7. On 30 March 2023 I responded by email to an email sent on 27 March 2023 by Lewis Cooper on behalf of Scott Mundy. This is omitted from Mr O'Brien's list.
8. Scott Mundy emailed me on 24 April 2023, specifically to try to arrange a meeting. As Mr O'Brien has noted I responded on 28 April 2023. That is the first occasion that I was contacted directly and individually to open discussions, as opposed to the generic bulk letters previously described (including the letters the council claims to have sent by which I cannot locate).
9. Scott Mundy emailed me on 16 May 2023 with a proposed offer price for my home. That is the first attempt to have any sort of discussion with me about specific terms of purchase. At this point I was in the process of seeking legal advice and contacting surveyors who might be able to advise on valuation. I responded by email initially on 30 May 2023 and have done so further on 2 July 2023, 18 July 2023, 2 August 2023, 6 August 2023, 30 August 2023 and 1 September 2023. Further correspondence is now being conducted via representatives of Ardent Management Limited, surveyors. There has been no shortage of responses from me.
10. Scott Mundy also contacted me by email on 30 May 2023 about format of the service of the council's statement of case to which I responded by email on 31 May 2023.
11. I therefore refute that I have been uncommunicative. It is clear from Mr O'Brien's list in his appendices that I was not difficult to contact by letter or email, and from my clarifications above, I have frequently responded. It is furthermore my contention that the contact only became direct and specific after the CPO notice was served in January 2023. Until then, the onus was put on me to make contact about a process which I was not looking for. The council wanted to purchase my home and should have been specific and direct in making contact with me.



Re
High Road West
Lendlease
Introductory letter

Date
March 2018

Page
01/02

Dear Neighbour,

As you may know, Lendlease has recently been appointed as Haringey Council's development partner to deliver the High Road West regeneration scheme. We would like to take this opportunity to introduce ourselves to all our neighbours including local residents, businesses and organisations in the area.

I want to emphasise that we are committed to engaging and involving you in an open and transparent way and that we will work with you to ensure the High Road West masterplan responds to the community's aspirations.

It is our intention to work with you to shape High Road West's future and that it becomes a new urban centre for Tottenham with new homes and workspace; a new district energy centre; a revitalised high street with local shops and restaurants; walking routes through new parks and public squares; a new library, learning and education centre; and an art and cultural centre at the heart of the development.

Building on the previous work and engagement completed by Haringey Council, we will be using the approved 2014 High Road West masterplan as a starting point for more detailed design work, aiming to submit the final masterplan proposals to Haringey Council in October 2018. Over the coming months, we will be out and about in the local area meeting people and introducing ourselves through pop-up street events and we will be based at The Grange (32 White Hart Lane) from mid-April where you can drop in anytime during working hours to speak to a member of the team.

We would also like to introduce our partner, Soundings, who will be working with us as part of the High Road West engagement team to ensure an open and meaningful discussion with you around the masterplan.

We are eager to meet you and involve you in the development of a more detailed masterplan that we aim to present to Haringey Council later in the year. There are a variety of ways you can get involved in shaping these proposals. To find out more and sign up to receive regular updates on upcoming engagement and consultation events, please visit <https://www.highroadwest.london/> or contact us using the details provided below.

Our plans also reach far beyond the physical transformation of the area. Our efforts will also extend to support social and economic opportunities for change to create a better future for all. Whether it's your wellbeing or job opportunities, skills training and so forth, we will collectively make a difference.

I look forward to meeting you in the near future.

Kind regards,

Richard Fagg
Project Director - High Road West

Lendlease
20 Triton Street,
Regent's Place,
London NW1 3BF

Engagement Team
The Grange,
32 White Hart Lane
Tottenham N17 8DP

T | 0800 124 4081
E | info@hrwcommunity.co.uk
W | www.highroadwest.london

Exhibit 2 – document properties of letter dated 14 November 2022

Placemaking & Housing

Scott Mundy Regeneration Manager



Date: 14 November 2022

Your ref: Re: High Road West scheme

Ms Mary Powell
63 Whitehall Street
London
N17 8BP

Dear Ms. Powell,

We have written to you previously regarding the rehousing offer to leaseholders as set out in this letter).

We would like to arrange an appointment agreement for the purchase of your current home. Please let us know your preferred times for requiring your property, how you wish to be contacted, and what times are available to you.

Our dedicated Rehousing Team are available to help you find your new home. In the meeting we can discuss the details of your requirements, with the aim to find the best solution for you.

Please kindly contact myself or one of the tea

- Scott Mundy, Regeneration Manager, Scott.Mundy@haringey.gov.uk
- David Clark, Estate Regeneration Manager, David.Clark2@haringey.gov.uk
- Lauren Schnieder, Community Engagement Officer, Lauren.Schnieder@haringey.gov.uk

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