

1. Acquiring Authority
2. P.P.J O'Brien
3. First statement
4. Exhibits - none
5. 15 November 2023

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

**PUBLIC INQUIRY**

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**WITNESS STATEMENT OF  
PATRICK PETER JAMES O'BRIEN**

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I, PATRICK PETER JAMES O'BRIEN (I am known as Peter O'Brien), of The London Borough of Haringey, Alexandra House, 10 Station Road, Wood Green N22 7TR, SAY AS FOLLOWS:

1. I am the Assistant Director for Regeneration & Economic Development at The London Borough of Haringey, the Acquiring Authority in relation to The London Borough of Haringey (High Road West Phase A) Compulsory Purchase Order 2023 ("the CPO").
2. Unless stated otherwise, the facts and matters set out in this Witness Statement are within my knowledge and I believe them to be true. Where any facts or matters are not within my own knowledge, the source of the information is identified and those facts and matters are true to the best of my knowledge and belief.
3. References in this Witness Statement to "[CD[X.XX]]" are to Core Documents issued in relation to the CPO inquiry.

**'REQUIRED RETURN' DEFINITION IN THE DA**

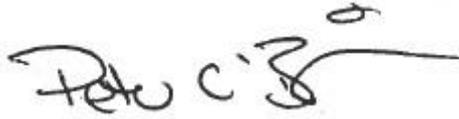
4. I gave evidence at the public inquiry into the CPO on Tuesday 7 and Wednesday 8 November 2023. I was cross-examined by Kings Counsel for 'THFC Group' (Objector 8) who asked whether I knew the 'Required Return' (i.e. the number) within the definition of that term in the Development Agreement

[CD5.16]. This is redacted in the public domain on the basis of commercial sensitivity.

5. I answered “no” to this question as I could not recall the exact details during the cross-examination. However, I am personally aware of the details comprised in the definition of ‘Required Return’, and the Council (corporately) is aware of the details, noting that the Council is party to the Development Agreement.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.



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Patrick Peter James O'Brien

15/11/2023

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Dated