

**THE LONDON BOROUGH OF HAVERING  
(HAROLD HILL TOWN CENTRE – CHIPPENHAM ROAD)  
COMPULSORY PURCHASE ORDER 2026**

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**STATEMENT OF CASE**

London Borough of Havering

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**PURSUANT TO RULE 7 OF THE COMPULSORY PURCHASE (INQUIRIES PROCEDURE)  
RULES 2007**

THE TOWN AND COUNTRY PLANNING ACT 1990  
AND  
THE ACQUISITION OF LAND ACT 1981

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## 1 Introduction

1.1 This Statement of Case (“the Statement”) has been prepared by the London Borough of Havering (“the Council”) in its capacity as acquiring authority pursuant to Rule 7 of the Compulsory Purchase (Inquiries Procedure) Rules 2007.

1.2 On 12th November, 2025 the Council resolved to make a Compulsory Purchase Order in respect of land, property and other proprietary interests in the land for the purposes of facilitating regeneration within that part of the Harold Hill Town Centre referred to as the Chippenham Road area as is more fully described in section four of this Statement (“the Scheme”).

1.3 On 14<sup>th</sup> April 2026 the Council made The London Borough of Havering (Harold Hill Town Centre - Chippenham Road ) Compulsory Purchase Order 2026 (“the Order”) pursuant to the statutory powers contained in s226 (1)(a) of the Town and Country Planning Act 1990 as amended (“the 1990 Act”) and the Acquisition of Land Act 1981

1.4 The Order was submitted to the Secretary of State for Housing, Communities and Local Government (“the Secretary of State”) for confirmation on 18 May 2026. Following the close of the period for objections on 15th May 2026 three statutory objections to the Order were received. The Secretary of State, by way of a letter dated 25 June 2026, has given notice of the intention to hold a public local inquiry (“the Inquiry”) into the objections.

1.5 This Statement outlines the Council’s case to be put forward at the Inquiry as to why the Order Land is to be acquired and the Order confirmed.

1.6 The Order Land is more fully described in section three of this Statement. The scheme which underlies the order (“the Development”) is described in more detail in section four. The Council’s justification for the use of compulsory purchase powers is explained in section six. The planning position and policy context within which the Council’s planning decision has been taken is set out in section five.

1.7 The Order has been made to facilitate the comprehensive redevelopment of land at Chippenham Road, Harold Hill, as part of the wider Harold Hill Town Centre regeneration programme. The redevelopment represents a key element of the Council’s long-term vision for Harold Hill and will deliver a high-quality affordable residential neighbourhood together with significant public realm, landscaping and environmental improvements.

1.8 Planning permission for the redevelopment was granted on 8 December 2025 (ref. P1150.24). The approved Scheme will provide 138 affordable homes comprising 116 Affordable Housing Units, secured through the Section 106 Agreement and to be delivered as London Affordable Rent and Social Rent homes, together with 22 Supported Housing Accommodation Units comprising self-contained supported housing for young people leaving care in line with the s106 Agreement.

1.9 For the purposes of this Statement, references to the approved Scheme delivering 138 affordable homes comprise both the 116 Affordable Housing Units and the 22 Supported Housing Accommodation Units. The Affordable Housing Units represent the general-needs affordable housing element of the Scheme, whilst the Supported Housing Accommodation Units provide specialist supported accommodation to meet an identified housing need.

1.10 The redevelopment will deliver a substantial contribution towards local housing need through the provision of modern, energy-efficient affordable homes designed to current accessibility and building standards. The Scheme includes a range of dwelling sizes together with specialist supported accommodation for supported housing and will provide significant public realm, landscaping and biodiversity enhancements.

1.11 In addition to the housing benefits, the redevelopment will provide enhanced public realm, new communal amenity spaces, improved landscaping, biodiversity enhancements and a safer residential environment designed in accordance with Secured by Design principles.

1.12 The Council considers that the redevelopment will deliver significant social, economic and environmental benefits through the replacement of obsolete and underutilised buildings with high-quality affordable housing and associated community benefits. The Scheme will contribute to the objectives of both the Havering Local Plan and the London Plan and forms an important component of the wider regeneration of Harold Hill Town Centre.

## **2 The Council's Purpose in Making the Order**

2.1 The London Borough of Havering faces significant housing and socio-economic challenges arising from a growing population, an ageing housing stock, and increasing demand for affordable homes. The borough has one of the highest proportions of post-war Council housing in East London, much of which is now at the end of its design life and no longer meets modern standards for accessibility, energy performance, or space efficiency. These pressures are particularly acute in Harold Hill, where concentrations of deprivation, poorer health outcomes and lower household incomes have been recorded compared with the borough average.

2.2 The Council's purpose in making the Order is to facilitate the comprehensive redevelopment of the Order Land at Chippenham Road, Harold Hill, in order to deliver much-needed affordable housing, improved public realm, enhanced amenity space and associated environmental improvements. The proposed redevelopment forms an important element of the wider regeneration objectives for Harold Hill Town Centre and will contribute to the achievement of the Council's strategic housing and regeneration priorities.

2.3 The Order Land is central to the delivery of the Scheme. The approved redevelopment will provide 138 affordable homes together with landscaping, play space, biodiversity enhancements, communal amenity areas, improved public realm and associated infrastructure. The Scheme will transform an under-utilised and partly vacant brownfield site into a high-quality residential neighbourhood designed to modern standards of accessibility, sustainability and environmental performance.

2.4 Before land assembly commenced, the site contained 32 residential dwellings comprising 24 flats and 8 houses. In addition, there is ancillary residential accommodation associated with The Alderman Public House. The approved Scheme will deliver 138 affordable homes. Whilst recognising the presence of the residential accommodation associated with the public house, the redevelopment will nevertheless result in a substantial increase in the amount of residential accommodation provided on the site, with the number of dwellings increasing from 32 to 138, representing a net increase of 106 homes

2.5 Under section 226(1)(a) of the Town and Country Planning Act 1990 a local authority may be authorised to compulsorily acquire land in its area if the authority considers that the acquisition will facilitate the carrying out of development, redevelopment or improvement on or in relation to the land. This power may be exercised where the authority considers that the proposed development, redevelopment or improvement is likely to contribute to one of the following objectives:

- 2.6 the promotion or improvement of the economic wellbeing of its area.
- 2.7 the promotion or improvement of the social wellbeing of their area; or

- 2.8 the promotion or improvement to the environmental wellbeing of their area

2.9 Paragraph 120.1 of Ministry of Housing Communities, and Local Government Guidance on the Compulsory Purchase Process updated June 2026 ( “the Guidance”) states that the power set out in section 2.5 above *“is intended to provide a positive tool to help acquiring authorities with planning powers to assemble land where this is necessary to implement proposals in their local Plan or where strong planning justifications for the use of the power exist”*.

2.10 The Council considers that the Order will facilitate development that will contribute to the promotion and improvement of the economic, social and environmental well-being of the area.

2.11 The economic benefits of the Scheme include investment in construction activity, local employment and training opportunities, increased spending within the local economy and support for the vitality and viability of Harold Hill Town Centre. The redevelopment will also make more effective use of previously developed land and support the long-term regeneration of the area.

2.12 The social benefits of the Scheme include the provision of 138 new affordable homes, including supported housing accommodation, helping to address identified housing need within the Borough. The Scheme will provide high-quality homes designed to modern space, accessibility and energy-efficiency standards together with new communal amenity areas, landscaping and play facilities, including a new community garden, that will promote health, wellbeing and community cohesion.

2.13 The environmental benefits of the Scheme include the redevelopment of some obsolete buildings and under-utilised brownfield land, the delivery of biodiversity net gain, enhanced green infrastructure, improved landscaping and public realm, sustainable drainage measures and energy-efficient buildings that will contribute towards the Council's wider climate objectives.

2.14 The Council is seeking the Order to assemble all remaining land and interests required to facilitate delivery of the Scheme. Whilst substantial progress has been made through acquisition by agreement, it has not been possible to secure all interests required within a reasonable timescale. The Council therefore considers that compulsory purchase powers are necessary to provide certainty that the Scheme can be delivered in full.

2.15 For the purposes of applying the no scheme principle, the relevant scheme is the scheme authorised by the Order itself. It is this Order scheme, and not any wider or longer-term regeneration proposals for the surrounding area, that must be disregarded when assessing compensation. This approach is consistent with the statutory framework and ensures that landowners are neither advantaged nor disadvantaged by assumptions relating to development beyond that which is authorised by the Order

2.16 The Council remains committed to acquiring interests by agreement wherever possible and negotiations with affected parties continue where practicable. However, without the Order there is no certainty that all interests necessary to implement the Scheme could be assembled, and the substantial public benefits arising from the redevelopment would be placed at risk.

2.17 The Council is satisfied that there is a compelling case in the public interest for the making and confirmation of the Order and that the acquisition of the Order Land will facilitate development that will contribute to the economic, social and environmental well-being of the area. The making of the Order therefore represents an appropriate, proportionate and lawful exercise of the Council's powers under section 226(1)(a) of the Town and Country Planning Act 1990.

### **3 Location and Description of the Order Land, Present Use and Ownership**

3.1 The Order Land is located within Heaton Ward, Harold Hill, in the north of the London Borough of Havering. It comprises two discrete parcels of land with a combined area of approximately 0.96 hectares, as shown edged red and shaded pink on the Order Map.

3.2 The Order Land comprises land on both sides of a central plot occupied by a vicarage, funeral services premises and church centre. Those properties do not form part of the Order Land but are surrounded on a number of sides by land forming part of the Scheme. Upon implementation, the development will present as a single comprehensive redevelopment site notwithstanding the retention of those existing uses.

3.3 The western part fronts Chippenham Road, Kings Lynn Drive and Dartfields. It includes Rothbury House, the site of the former London Borough of Havering Housing Office, the Alderman Public House and adjoining surface car parking. The former Housing Office has already been demolished pursuant to the relevant prior approval for demolition (application reference F0003.23). Rothbury House is a three-storey block formerly comprising 12 self-contained flats and is yet to be demolished as one long leasehold interest remains. The Alderman Public House is within the Order Land and is subject to the leasehold arrangements described below.

3.4 The eastern part fronts Chippenham Road and Kings Lynn Drive. It includes the site of Crediton House, formerly a three-storey block of 12 self-contained flats, and a terrace of houses at 70–84 Chippenham Road. Crediton House and Nos. 74–84 Chippenham Road have already been demolished. Nos. 70 and 72 Chippenham Road remain. No. 70 is occupied by a secure tenant. No. 72 is vacant but forms the other half of the semi-detached pair with No. 70 and cannot be demolished independently until possession of No. 70 has been obtained.

3.5 In total, the Order Land formerly accommodated 32 dwellings, comprising 24 flats and 8 houses, together with a public house, office building and ancillary hardstanding and parking areas. A significant proportion of those buildings has now been cleared in accordance with the demolition consents and planning permissions already secured.

3.6 The Order Land is bounded predominantly by residential development to the south, east and west, comprising two-storey semi-detached and terraced houses from the original 1950s estate layout. To the north, across Chippenham Road, lies the Harold Hill District Centre, the principal shopping area for Harold Hill. A notable proportion of this area is identified for regeneration as part of the Harold Hill Town Centre Masterplan Vision and resolution to grant a separate planning application (reference P0421.25) was given in November 2025 for redevelopment proposals in that part of the town centre, including provision for a replacement public house use.

3.7 Vehicular and pedestrian access to and around the Order Land is available from Chippenham Road, Kings Lynn Drive and Dartfields. Public transport is available from bus stops on Hilldene Avenue within walking distance of the Order Land.

3.8 The Council owns the freehold interests in all properties within the Order Land. However, there remain third-party leasehold and occupational interests which must be acquired or otherwise resolved to enable the Scheme to be delivered. These include interests in 10 Rothbury House, 70 Chippenham Road and the Alderman Public House.

3.9 The Council has considered whether any of the land proposed to be included within the Order falls within a special category as defined by statute. These include land held by or on behalf of the Crown, land belonging to a local authority, statutory undertakers' land, open space, common land, fuel or field garden allotments, and ecclesiastical property.

3.10 None of the land within the Order Land is Crown land, nor is it held by or on behalf of a government department. Accordingly, no additional consents are required under section 226(2A) of the Town and Country Planning Act 1990 or section 82 of the Housing and Planning Act 2016.

3.11 The land is not subject to any trust for allotment purposes, nor is it designated as open space or common land within the meaning of sections 19 and 20 of the Acquisition of Land Act 1981. The redevelopment of the Order Land will, however, deliver new areas of high-quality public realm and landscaped open space, providing a net increase in accessible amenity space available to the community.

3.12 In relation to the residential interests, the Council has already made substantial progress in securing vacant possession and rehousing former occupiers. Ten properties have been 'bought back' where previous owners or occupiers had exercised the Right to Buy, and 20 former Council tenant households have been rehoused in accordance with the Council's Local Lettings Plan. The remaining residential interests include the leasehold interest in 10 Rothbury House, which is not occupied, and the secure tenancy at 70 Chippenham Road, who remains in occupation. No. 72 Chippenham Road is vacant but remains physically connected to No. 70 and its demolition is therefore dependent on vacant possession of No. 70 being secured.

3.13 The Alderman Public House, located on Chippenham Road, also falls within the Order Land. In its efforts to secure land by agreement, the Council acquired the freehold interest. It is, however subject to a head lease to Stonegate Pub Company Limited / Unique Pub Properties Theta Ltd and an underlease to Cubitt Taverns Limited. The Council has sought to acquire both leasehold interests by agreement. It has entered into an option agreement with Cubitt Taverns Limited to enable voluntary acquisition of its interest. At this time, no agreement has been reached with the head leaseholder.

3.14 The Order Land also includes operational utilities and service connections relating to electricity, gas, water and telecommunications infrastructure. Relevant statutory undertakers and service providers have been identified through land referencing, Land Registry searches and site survey work. The Council will continue to liaise with those bodies to ensure that any statutory interests are protected, relocated or otherwise addressed as part of the implementation of the Scheme.

3.15 The progressive clearance of buildings within the Order Land reflects the Council's ongoing implementation of the regeneration proposals. However, the remaining land and property interests prevent the Council from securing full vacant possession and delivering the Scheme in a comprehensive and timely manner. The purpose of the Order is therefore to enable the Council to acquire or override those remaining interests so that the approved redevelopment can proceed.

3.16 The Council has made substantial progress in assembling the Order Land and securing vacant possession. Former occupiers have been rehoused, a number of former residential interests have been acquired or otherwise resolved, and substantial demolition has already taken place in accordance with the relevant demolition consents and planning permissions.

3.17 The remaining interests are limited but critical to delivery. In particular, the outstanding interests at 10 Rothbury House, 70 Chippenham Road and the Alderman Public House prevent the Council from securing full control of the Order Land and delivering the Scheme comprehensively and within programme.

3.18 The Council will continue to seek to resolve the remaining interests by agreement, where practicable. However, the Order is required to provide certainty that those interests can be acquired or overridden if agreement cannot be reached, enabling the approved redevelopment to proceed.

3.19 The table below summarises the current position by property. It shows the extent of acquisition, rehousing, vacant possession and clearance activity already undertaken across the Order Land.

| Property                                   | Former / Existing Use         | Current Position | Status                                        |
|--------------------------------------------|-------------------------------|------------------|-----------------------------------------------|
| Former LBH Housing Office, Chippenham Road | Former Council housing office | Demolished       | Vacant possession secured / cleared           |
| Crediton House Flat 1                      | Residential flat              | Demolished       | Vacant possession secured / cleared           |
| Crediton House Flat 2                      | Residential flat              | Demolished       | Vacant possession secured / cleared           |
| Crediton House Flat 3                      | Residential flat              | Demolished       | Vacant possession secured / cleared           |
| Crediton House Flat 4                      | Residential flat              | Demolished       | Vacant possession secured / cleared           |
| Crediton House Flat 5                      | Residential flat              | Demolished       | Vacant possession secured / cleared           |
| Crediton House Flat 6                      | Residential flat              | Demolished       | Vacant possession secured / cleared           |
| Crediton House Flat 7                      | Residential flat              | Demolished       | Vacant possession secured / cleared           |
| Crediton House Flat 8                      | Residential flat              | Demolished       | Vacant possession secured / cleared           |
| Crediton House Flat 9                      | Residential flat              | Demolished       | Vacant possession secured / cleared           |
| Crediton House Flat 10                     | Residential flat              | Demolished       | Vacant possession secured / cleared           |
| Crediton House Flat 11                     | Residential flat              | Demolished       | Vacant possession secured / cleared           |
| Crediton House Flat 12                     | Residential flat              | Demolished       | Vacant possession secured / cleared           |
| Rothbury House Flat 1                      | Residential flat              | Vacant           | Vacant possession secured / interest resolved |
| Rothbury House Flat 2                      | Residential flat              | Vacant           | Vacant possession secured / interest resolved |
| Rothbury House Flat 3                      | Residential flat              | Vacant           | Vacant possession secured / interest resolved |

|                               |                                              |                                  |                                                                                                                                     |
|-------------------------------|----------------------------------------------|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| Rothbury House Flat 4         | Residential flat                             | Vacant                           | Vacant possession secured / interest resolved                                                                                       |
| Rothbury House Flat 5         | Residential flat                             | Vacant                           | Vacant possession secured / interest resolved                                                                                       |
| Rothbury House Flat 6         | Residential flat                             | Vacant                           | Vacant possession secured / interest resolved                                                                                       |
| Rothbury House Flat 7         | Residential flat                             | Vacant                           | Vacant possession secured / interest resolved                                                                                       |
| Rothbury House Flat 8         | Residential flat                             | Vacant                           | Vacant possession secured / interest resolved                                                                                       |
| Rothbury House Flat 9         | Residential flat                             | Vacant                           | Vacant possession secured / interest resolved                                                                                       |
| <b>Rothbury House Flat 10</b> | <b>Residential flat / leasehold interest</b> | <b>Unoccupied</b>                | <b>Leasehold interest outstanding; acquisition sought through the Order if not resolved by agreement</b>                            |
| Rothbury House Flat 11        | Residential flat                             | Vacant                           | Vacant possession secured / interest resolved                                                                                       |
| Rothbury House Flat 12        | Residential flat                             | Vacant                           | Vacant possession secured / interest resolved                                                                                       |
| <b>70 Chippenham Road</b>     | <b>Residential dwelling</b>                  | <b>Occupied by secure tenant</b> | <b>Vacant possession outstanding; rehousing / possession process ongoing</b>                                                        |
| 72 Chippenham Road            | Residential dwelling                         | Vacant                           | Vacant, but forms part of semi-detached pair with No. 70 and cannot practically be demolished until possession of No. 70 is secured |
| 74 Chippenham Road            | Residential dwelling                         | Demolished                       | Vacant possession secured / cleared                                                                                                 |
| 76 Chippenham Road            | Residential dwelling                         | Demolished                       | Vacant possession secured / cleared                                                                                                 |
| 78 Chippenham Road            | Residential dwelling                         | Demolished                       | Vacant possession secured / cleared                                                                                                 |

|                                                   |                                    |                                                     |                                                                                                    |
|---------------------------------------------------|------------------------------------|-----------------------------------------------------|----------------------------------------------------------------------------------------------------|
| 80 Chippenham Road                                | Residential dwelling               | Demolished                                          | Vacant possession secured / cleared                                                                |
| 82 Chippenham Road                                | Residential dwelling               | Demolished                                          | Vacant possession secured / cleared                                                                |
| 84 Chippenham Road                                | Residential dwelling               | Demolished                                          | Vacant possession secured / cleared                                                                |
| <b>The Alderman Public House, Chippenham Road</b> | <b>Public house</b>                | <b>Operational / subject to leasehold interests</b> | <b>Council owns freehold; Cubitt option agreement entered into; Stonegate interest outstanding</b> |
| Adjoining surface car park / hardstanding         | Ancillary parking / hardstanding   | Within Order Land                                   | Council freehold / required for Scheme                                                             |
| Utility and service interests                     | Operational utilities and services | To be protected, diverted or addressed as necessary | Statutory undertaker interests identified and managed through implementation                       |

## 4 The Harold Hill Regeneration Scheme

### 4.1 Background to Scheme

4.1.1 The origins of the Scheme lie within the Council's wider estate renewal and regeneration programme. In 2016, the Council identified a number of housing sites for regeneration, including the Farnham and Hilldene Estate within Harold Hill, with the objective of increasing affordable housing provision, improving the quality of the existing housing stock and delivering wider social and economic benefits. These proposals ultimately formed part of the Havering and Wates Regeneration Programme established in 2018 to deliver long-term estate renewal and housing-led regeneration across the Borough.

4.1.2 Whilst Farnham and Hilldene formed part of the original regeneration programme, Chippenham Road was subsequently identified as a complementary opportunity site following the planned closure of the Council's housing office. Owing to its proximity to Harold Hill Town Centre, the extent of Council ownership and its potential to support housing-led regeneration, the site was considered capable of making an important contribution to the wider regeneration ambitions for the area. Capacity studies demonstrated the potential for significant new housing provision and, in February 2019, Cabinet approved the incorporation of Chippenham Road into the Havering and Wates Regeneration Programme and authorised further work to develop detailed proposals for the site.

4.1.3 Building upon this earlier work, the Council subsequently developed a wider regeneration vision for Harold Hill. In March 2021 Cabinet approved a coordinated masterplan approach for Farnham and Hilldene District Centre, Chippenham Road and Abercrombie Hostel. Within that vision, Chippenham Road was identified as a key opportunity site capable of delivering new affordable housing and supporting the wider social, environmental and place-making objectives for Harold Hill.

The Scheme has evolved from that wider regeneration strategy and forms an important component of the Council's long-standing plans for the area

## **4.2 Vision and Objectives**

4.2.1 The Council's objective is to deliver a comprehensive redevelopment of the Order Land that makes more effective use of the site and contributes towards the wider regeneration of Harold Hill Town Centre.

4.2.2 The Scheme seeks to:

- 4.2.3 deliver much-needed affordable housing;
- 4.2.4 make more effective use of a previously developed brownfield site;
- 4.2.5 improve the quality of the built environment;
- 4.2.6 create attractive and usable public spaces;
- 4.2.7 support the wider regeneration objectives for Harold Hill Town Centre; and
- 4.2.8 deliver long-term social, economic and environmental benefits for the area.

## **4.3 The Approved Scheme**

4.3.1 Planning permission was granted for the comprehensive redevelopment of the Order Land on 8th December 2025 (reference P1150.24). The approved development will provide 138 affordable homes, comprising 116 Affordable Housing Units and 22 Supported Housing Accommodation Units, together with landscaping, play space, biodiversity enhancements, car and cycle parking and ancillary works.

4.3.2 A prior approval (reference F0003.23) and planning permission (reference P1274.23) have also been secured for demolition works and a significant amount of site clearance has already been undertaken pursuant to the prior approval, including the demolition of Crediton House, the former Housing Office and Nos. 74–84 Chippenham Road.

## **4.4 Affordable Housing Delivery**

4.4.1 The Scheme will provide 138 affordable homes, comprising 116 Affordable Housing Units and 22 Supported Housing Accommodation Units, with a mix of one, two, three and four-bedroom homes alongside specialist supported accommodation.

4.4.2 The development will make a significant contribution towards identified housing need within the Borough and will provide modern homes built to current accessibility, space and energy efficiency standards.

## **4.5 Public Realm and Environmental Improvements**

4.5.1 The Scheme includes new residents' gardens, communal amenity areas, a new community garden, formal and informal play space, landscaping and biodiversity enhancements.

4.5.2 The layout and landscape strategy have been designed to create a safe and attractive environment for residents through the provision of high-quality amenity space, improved landscaping, enhanced biodiversity and green infrastructure.

## **4.6 Delivery of the Scheme**

4.6.1 The Council has made significant progress in assembling the Order Land and securing vacant possession. However, a small number of remaining interests continue to prevent the comprehensive implementation of the Scheme.

4.6.2 The Order is therefore required to provide certainty that the remaining interests can be acquired, enabling the approved redevelopment to proceed in full.

## **5 Planning Policy Context**

5.1 Planning permission for the redevelopment of the Order Land and a concurrent planning permission for the demolition of the public house were granted on 8th December 2025, following consideration by the Council's Strategic Planning Committee on 27th February 2025 (application reference P1150.24). Concurrently planning permission was also granted for the demolition of the public house on 8th December 2025 (reference P1274.23). Prior approval for demolition (ref. F0003.23) had previously been granted on 8th September 2023.

5.2 The Council considers that the Scheme accords with national, regional and local planning policy and that the planning merits of the Scheme provide substantial support for confirmation of the Order.

### **5.1 National Planning Policy**

5.1.1 The Order Land comprises previously developed brownfield land. In accordance with the National Planning Policy Framework, proposals that accord with the development plan should be approved without delay and seeks to ensure that land with permission is developed without unnecessary delay. National policy promotes the effective use of land to meet housing needs, safeguard the environment and support healthy living conditions.

5.1.2 The Council considers that the Scheme is consistent with those objectives through the redevelopment of a previously developed site for affordable housing and associated public realm improvements.

### **5.2 The London Plan**

5.2.1 The Scheme has been developed in accordance with the objectives of the London Plan (2021), including those relating to housing delivery, affordable housing, design quality, accessibility, urban greening, biodiversity and sustainable development.

5.2.2 In particular, the Scheme supports:

- 5.2.3 Policy GG2 – Making the Best Use of Land;
- 5.2.4 Policies H1 and H5–H7 – Delivering the Homes Londoners Need;
- 5.2.5 Policy D3 – Optimising Site Capacity through the Design-Led Approach;
- 5.2.6 Policies D5 and D7 – Inclusive Design and Accessible Housing;
- 5.2.7 Policies G5 and G6 – Urban Greening and Biodiversity; and
- 5.2.8 Policies SI1–SI7 – Sustainable Design and Climate Resilience.

5.2.9 The Council considers that the Scheme makes an important contribution towards the delivery of affordable housing and the effective use of brownfield land within London.

### **5.3 Havering Local Plan**

5.3.1 The adopted development plan includes the Havering Local Plan (2021).

5.3.2 The Order Land lies immediately south of the Harold Hill District Centre and forms part of the Harold Hill Strategic Growth Area, identified within the Local Plan as suitable for regeneration and housing delivery.

5.3.3 The Scheme supports a number of Local Plan objectives, including those relating to:

- 5.3.4 housing delivery;
- 5.3.5 affordable housing provision;
- 5.3.6 housing mix;
- 5.3.7 urban design;
- 5.3.8 landscaping and public realm;
- 5.3.9 nature conservation and biodiversity; and
- 5.3.10 sustainable and low-carbon development.

5.3.11 The Council considers that the redevelopment of the Order Land will directly contribute to the delivery of the Borough's housing and regeneration objectives.

5.3.12 There are no known archaeological designations affecting the Order Land. Any archaeological matters were considered as part of the planning application process, and no issues have been identified that would prevent or constrain redevelopment.

5.3.13 No listed building consent, conservation area consent, or scheduled monument consent is required, as there are no designated heritage assets within or adjacent to the Order Land.

### **5.4 Planning Permission**

5.4.1 Planning permission (ref. P1150.24) was granted on 8th December 2025 for the redevelopment of the Order Land to provide 138 affordable homes, comprising 116 Affordable Housing Units and 22 Supported Housing Accommodation Units, together with landscaping, play space, biodiversity enhancements, car and cycle parking, and ancillary works.

5.4.2 In addition:

- 5.4.3 Prior approval for demolition of existing structures (ref. F0003.23) was granted on 8 September 2023; and
- 5.4.4 Planning permission for demolition of all existing buildings, including the Alderman Public House (ref. P1274.23), was granted on 8th December 2025.

5.4.5 A significant amount of demolition and site clearance has already been undertaken pursuant to those consents.

### **5.5 Planning Conclusions**

5.5.1 The planning merits of the Scheme have been comprehensively assessed through the planning application process.

5.5.2 The Council is satisfied that the Scheme accords with the National Planning Policy Framework, the London Plan (2021) and the Havering Local Plan (2021). The grant of planning permission provides clear evidence that the redevelopment of the Order Land is acceptable in planning terms

and supports the Council's conclusion that there is a compelling case in the public interest for confirmation of the Order.

## **6 Justification for Compulsory Purchase**

### **6.1 Compulsory purchase powers**

6.1.1 The Council is the local planning authority for the Order Land and is therefore empowered to promote a Compulsory Purchase Order for planning purposes.

6.1.2 Section 226(1)(a) of the Town and Country Planning Act 1990 ("the 1990 Act") enables a local authority to acquire land compulsorily if it thinks that the acquisition will facilitate the carrying out of development, redevelopment or improvement on, or in relation to, the land being acquired.

6.1.3 Section 226(1A) provides that an authority may not exercise this power unless it thinks that the proposed development, redevelopment or improvement is likely to contribute to the achievement of one or more of the following objectives:

- the promotion or improvement of the economic well-being of its area;
- the promotion or improvement of the social well-being of its area; or
- the promotion or improvement of the environmental well-being of its area.

6.1.4 The Council is satisfied that the proposed use of compulsory purchase powers will enable the comprehensive redevelopment of the Order Land in a manner that will deliver social, economic and environmental improvements. The scheme will provide new, high-quality affordable housing in place of poor-quality, low-density housing, thereby securing both quantitative and qualitative improvements to the Borough's housing stock.

6.1.5 The Acquisition of Land Act 1981 (as amended by the Planning and Compulsory Purchase Act 2004) sets out the procedural requirements for the making, submission and confirmation of a Compulsory Purchase Order. The London Borough of Havering is the acquiring authority for the purposes of the Order.

6.1.6 The Guidance on the Compulsory Purchase Process and The Crichel Down Rules ("the CPO Guidance") recognises that the power under Section 226 of the 1990 Act is a positive tool that enables local authorities to assemble land to help deliver proposals in their adopted planning framework, where there is a clear and compelling planning justification.

6.1.7 The CPO Guidance also sets out the general policy considerations that the Secretary of State will take into account when deciding whether to confirm an Order, including the existence of a compelling case in the public interest and the adequacy of attempts to acquire land by agreement.

### **6.2 Government guidance**

6.2.1 The Council has had regard to the Government's Guidance on the Compulsory Purchase Process (June 2026) ("the CPO Guidance"). The Statement of Reasons was prepared having regard to the CPO Guidance in force at the time it was written. Since publication of the Statement of Reasons, the CPO Guidance has been reissued and updated. The Council has reviewed the updated guidance and remains satisfied that the justification for the Order remains fully consistent with its requirements.

6.2.2 The CPO Guidance recognises that compulsory purchase powers are an important mechanism for assembling land required to deliver social, environmental and economic change and can contribute towards regeneration, infrastructure delivery and improvements in quality of life.

6.2.3 The CPO Guidance also confirms that acquiring authorities should use compulsory purchase powers where it is expedient to do so and where there is a compelling case in the public interest for making a compulsory purchase order.

6.2.4 The CPO Guidance identifies a number of matters which an acquiring authority should address when promoting a compulsory purchase order, including:

- a) the purpose for which the land is required and whether that purpose justifies interference with private rights and interests;
- b) whether there is a reasonable prospect that the proposed scheme will proceed;
- c) whether the resources necessary to deliver the scheme are likely to be available within a reasonable timescale;
- d) whether there are any planning, legal, physical or other impediments which are likely to prevent implementation; and
- e) the extent to which efforts have been made to acquire land and interests by agreement.

6.2.5 The CPO Guidance further confirms that the powers contained within section 226 of the Town and Country Planning Act 1990 are intended to provide a positive tool to assist local authorities in assembling land where this is necessary to implement proposals contained within the development plan or where there are otherwise strong planning justifications for the use of compulsory purchase powers.

6.2.6 In considering whether to confirm an order made under section 226(1)(a), the Secretary of State will have regard to matters including:

- a) whether the purpose for which the land is being acquired accords with the development plan and relevant national policy;
- b) the extent to which the proposed development will contribute towards the economic, social and environmental wellbeing of the area;
- c) whether the objectives of the Scheme could reasonably be achieved by alternative means; and
- d) whether there is a reasonable prospect that the Scheme will be delivered, including having regard to funding and overall viability.

6.2.7 As set out in the following sections of this Statement, the Council considers that the Order satisfies each of these requirements. The Scheme benefits from planning permission, accords with the adopted planning framework, is funded and deliverable, and will provide substantial economic, social and environmental benefits. The Council has also taken extensive steps to acquire land and interests by agreement and will continue to do so while the Order progresses where practically possible.

6.2.8 Accordingly, the Council is satisfied that there is a compelling case in the public interest for confirmation of the Order and that the requirements of the CPO Guidance are fully met.

### **6.3 Compelling case in the public interest.**

6.3.1 The Council considers that there is a compelling case in the public interest for confirmation of the Order.

6.3.2 The Government's guidance on the compulsory purchase process confirms that acquiring authorities should use compulsory purchase powers where it is expedient to do so and where there is a compelling case in the public interest for making a compulsory purchase order. The Council considers that this test is clearly met in respect of the Order.

6.3.3 The purpose of the Order is to facilitate the comprehensive redevelopment of the Order Land and the delivery of the approved Scheme. Planning permission has been granted for the redevelopment of the site to provide 138 affordable homes, comprising 116 Affordable Housing Units and 22 Supported Housing Accommodation Units, together with landscaping, play space, biodiversity enhancements, car parking, cycle parking and associated works.

6.3.4 The Scheme forms part of the wider regeneration of Harold Hill and will redevelop a site currently occupied by obsolete, partly vacant and under-utilised buildings. It will replace 32 existing dwellings with 138 affordable homes, representing a substantial increase in affordable housing provision on the Order Land.

6.3.5 The Council considers that the public benefits arising from the Scheme are substantial. They include:

- the delivery of 138 affordable homes including
  - the provision of 116 Affordable Housing Units;
  - the provision of 22 Supported Housing Accommodation Units;
- the delivery of affordable housing secured through the planning obligations;
- a significant net increase in housing provision compared with the existing position;
- homes built to modern space, accessibility and energy-efficiency standards;
- new communal amenity space, residents' gardens, a community garden and formal and informal play space;
- biodiversity enhancement and urban greening measures;
- local employment, recruitment, training and apprenticeship opportunities;
- use of local labour and local suppliers through the development process;
- transport and car club measures; and
- public house reprovision obligations within the wider regeneration area.

6.3.6 The signed Section 106 Agreement includes obligations relating to affordable housing, Supported Housing Accommodation, Biodiversity Net Gain, local resident training and recruitment, apprenticeship positions, local labour, local suppliers, car club provision and public house reprovision.

6.3.7 The Council considers that the Scheme will deliver the type of social, environmental and economic change contemplated by the CPO Guidance. The Order will enable the assembly of the remaining interests needed to deliver a housing-led regeneration scheme which has the benefit of planning permission and which will provide substantial public benefits for Harold Hill and the wider Borough.

6.3.8 The Council has considered the impact of the Order on those with remaining interests in the Order Land. It recognises that compulsory purchase involves interference with private interests. However, the Council considers that the public benefits of the Scheme significantly outweigh that interference. The acquisition is necessary, proportionate and justified in order to secure the comprehensive delivery of the approved redevelopment.

6.3.9 The Council is satisfied that the Scheme is capable of proceeding within a reasonable timescale. Planning permission has been granted, the Scheme is supported by planning conditions and obligations, funding and delivery arrangements have been confirmed, and substantial progress has already been made in securing vacant possession and assembling the Order Land.

6.3.10 For these reasons, the Council considers that there is a compelling case in the public interest for confirmation of the Order.

## **6.4 Social wellbeing**

6.4.1 The Council considers that the Scheme will make a substantial contribution towards the promotion and improvement of the social wellbeing of the area.

6.4.2 The principal social benefit of the Scheme is the delivery of 138 affordable homes. These comprise 116 Affordable Housing Units and 22 Supported Housing Accommodation Units. The affordable housing provision is a central part of the Scheme and responds directly to identified housing need within the Borough.

6.4.3 The Scheme will provide a mix of one, two, three and four-bedroom homes, capable of meeting a range of household needs. It will replace a low-density arrangement of 32 existing dwellings with a substantially greater number of modern affordable homes.

6.4.4 The provision of 22 Supported Housing Accommodation Units is a particularly important social benefit. The Council identifies this specialist accommodation as meeting an important need, and the Section 106 Agreement includes provisions intended to secure that accommodation.

6.4.5 The approved development will provide homes built to modern accessibility standards. This includes the provision of 90% M4(2) accessible and adaptable dwellings and 10% M4(3) wheelchair-user dwellings. This will represent a significant improvement when compared with the existing housing stock on the site, which does not provide the same level of accessibility.

6.4.6 The existing residential buildings were assessed during the planning process and were found to have significant limitations. These included a lack of step-free access, poor insulation, low internal floor-to-ceiling heights and failure to meet modern space standards. The Scheme will replace those buildings with homes that meet current standards and better respond to modern housing needs.

6.4.7 The Scheme will also provide new communal amenity space, residents' gardens, a community garden and formal and informal play space. This includes the provision of 1,248 sqm of play space, exceeding planning policy requirements. These facilities will provide opportunities for recreation, social interaction and community cohesion.

6.4.8 The community garden is also an important element of the Scheme. The Council notes the inclusion of allotment space, dedicated areas for care leavers, social areas and opportunities for gardening. These features will contribute towards health, wellbeing and community interaction.

6.4.9 The development has been designed with regard to Secured by Design principles. This will assist in creating a safer and more attractive residential environment for future residents.

6.4.10 The Council therefore considers that the Scheme will make a significant contribution towards the social wellbeing of Harold Hill and the wider Borough.

## **6.5 Economic Wellbeing**

6.5.1 The Council considers that the Scheme will contribute towards the promotion and improvement of the economic wellbeing of the area.

6.5.2 The redevelopment will secure substantial investment in Harold Hill through the construction of new homes, landscaping and public realm improvements. This investment will generate direct and indirect economic activity during the construction phase and support the wider regeneration of Harold Hill Town Centre.

6.5.3 The signed Section 106 Agreement includes employment and training obligations. These include the preparation and implementation of a Local Resident Training and Recruitment Plan and an Education Commitments Plan.

6.5.4 The Section 106 Agreement also includes obligations requiring reasonable endeavours to provide five apprenticeship positions during construction. This will support skills development and training opportunities associated with the delivery of the Scheme.

6.5.5 The Section 106 Agreement also includes reasonable endeavours obligations for at least 20% of suppliers used during construction to be local suppliers and for at least 20% of people working on the construction of the Scheme to be residents of Havering or neighbouring boroughs.

6.5.6 The Scheme will also introduce additional residents into the area. This will increase activity and expenditure within the local economy and support local businesses and services, including those within the Harold Hill District Centre.

6.5.7 The redevelopment of a partly vacant and under-utilised site will also support broader investment confidence in Harold Hill and contribute towards the regeneration of the town centre area.

6.5.8 The Council therefore considers that the Scheme will make a positive contribution towards the economic wellbeing of the area.

## **6.6 Environmental Wellbeing**

6.6.1 The Council considers that the Scheme will make a significant contribution towards the promotion and improvement of the environmental wellbeing of the area.

6.6.2 The Order Land currently contains a number of obsolete, partly vacant and under-utilised buildings, together with areas of hardstanding. The Scheme will make more effective use of previously developed brownfield land and replace the existing buildings with modern affordable housing, landscaping, play space and environmental enhancements.

6.6.3 The existing residential buildings have poor thermal performance and do not meet modern standards. The Scheme will replace those buildings with modern energy-efficient homes built to current standards.

6.6.4 The approved development includes residents' gardens, communal amenity areas, a community garden, play space, landscaping and biodiversity enhancements. These features will significantly improve the quality and usability of the site when compared with the existing position.

6.6.5 The Scheme will deliver Biodiversity Net Gain and an Urban Greening Factor of 0.45, exceeding policy requirements. The Section 106 Agreement includes mechanisms for securing biodiversity delivery, monitoring and long-term management.

6.6.6 The scheme includes a number of energy and sustainability measures. These include heat pumps, photovoltaic panels and a 77% reduction in regulated carbon emissions. The Scheme also includes measures to allow future connection to a district heating network.

6.6.7 The Scheme has been designed to provide a safer and more attractive residential environment, including through Secured by Design principles, improved natural surveillance, landscaping and controlled routes.

6.6.8 The Council therefore considers that the Scheme will make a substantial contribution towards the environmental wellbeing of the area.

## **6.7 Alternatives**

6.7.1 The CPO Guidance identifies that, when considering whether to confirm an order made under section 226(1)(a), the confirming authority may consider whether the purpose for which the acquiring authority is proposing to acquire the land could be achieved by other means. This may include consideration of alternative proposals or alternative locations.

6.7.2 The Council has considered alternatives to the comprehensive redevelopment of the Order Land.

6.7.3 As part of the planning and design process, three options were explored using the existing fabric of the residential buildings. The options were based on retention and adaptation of the existing buildings.

6.7.4 Those options were discounted and noted that the existing homes have no step-free access, are poorly insulated, have low internal floor-to-ceiling heights, do not meet modern space standards and provide a low density of housing on the site.

6.7.5 The retention of the existing homes would not achieve sufficient social and environmental benefits to warrant their retention. In particular, the refurbishment options would not deliver the same scale of affordable housing, supported housing, accessibility improvements, amenity provision or wider environmental benefits as the approved Scheme.

6.7.6 The Council therefore concluded that comprehensive redevelopment represented the most appropriate means of delivering its housing, regeneration and environmental objectives for the Order Land.

6.7.7 The Council is not aware of any realistic alternative capable of delivering the same overall benefits as the approved Scheme within a reasonable timescale.

## **6.8 Necessity of Acquisition**

6.8.1 The CPO Guidance requires the acquiring authority to demonstrate that there is a reasonable prospect of the scheme proceeding and that compulsory acquisition is necessary to enable delivery. The Council considers that those requirements are met in this case.

6.8.2 The Scheme benefits from planning permission and is supported by planning conditions and obligations in the decision notice. The Section 106 Agreement includes obligations relating to

affordable housing, Supported Housing Accommodation, Biodiversity Net Gain, local resident training and recruitment, apprenticeships, local labour, local suppliers, car club provision and public house reprovision.

6.8.3 The Council has made substantial progress in assembling the Order Land and securing vacant possession. Former occupiers have been rehoused, the majority of residential interests have been resolved and significant demolition and site clearance has already taken place. This includes the demolition of Crediton House, the former Housing Office and Nos. 74–84 Chippenham Road.

6.8.4 Despite that progress, a limited number of interests remain outstanding. These remaining interests prevent the Council from obtaining full control of the Order Land and therefore prevent the comprehensive implementation of the approved Scheme.

6.8.5 The outstanding interests are limited in number but critical in practical terms. They include interests at 10 Rothbury House, 70 Chippenham Road and the Alderman Public House. Without acquisition of those remaining interests, the Council cannot be certain that the Scheme can be delivered comprehensively or within a reasonable timescale.

6.8.6 The Council has sought, and continues to seek where practicable, acquisition by agreement. However, there is no certainty that all outstanding interests can be acquired by agreement within the timescale required to deliver the Scheme. The Order is therefore required as a backstop to provide delivery certainty.

6.8.7 Without confirmation of the Order, there is a real risk that delivery of the Scheme would be delayed or prevented and that the substantial public benefits identified above would not be secured.

6.8.8 The Council therefore considers that compulsory acquisition of the remaining interests is necessary, proportionate and justified in the public interest.

## **7 Implementation and Funding**

7.1 The Council is satisfied that the Scheme is funded, viable and deliverable, and that there is a clear and reasonable prospect that it will proceed following confirmation of the Order and completion of the remaining land assembly.

7.2 The Scheme is not a proposal awaiting funding or approval. Planning permission has been secured, substantial site clearance has already taken place, funding has been identified and approved, and contractual delivery arrangements are in place. The purpose of the Order is to secure the remaining interests required to facilitate implementation of the approved redevelopment.

### **7.1 Funding**

7.1.1 The Council has secured the funding required to implement the Scheme and is satisfied that the necessary financial resources are available within a reasonable timescale.

7.1.2 The Scheme benefits from an approved development budget of approximately £67.3 million, approved through the Council's governance and budget-setting processes as part of the Havering and Wates Joint Venture Business Plan and Budget. The approved budget forms part of the Council's wider capital programme and reflects the Council's commitment to delivering the Scheme.

7.1.3 The approved development budget incorporates funding from a number of sources, including support from the Council's Housing Revenue Account and £29,926,000 of grant funding secured through the Greater London Authority Affordable Homes Programme. The grant funding has been

accepted under an existing funding agreement and therefore represents an identified and secured source of funding for the Scheme, rather than anticipated future funding.

7.1.4 Separate provision has also been made for land acquisition and assembly through the Council's approved Housing Revenue Account acquisition budget. The Council has confirmed that sufficient provision exists for acquisition costs, statutory compensation liabilities, professional fees and implementation costs associated with securing the remaining interests required to deliver the Scheme.

7.1.5 The Council is therefore satisfied that the financial resources necessary to acquire the outstanding interests within the Order Land and deliver the approved redevelopment have been identified and secured. The Scheme is not dependent upon the future identification of funding sources or the outcome of any further funding application process.

## **7.2 Viability**

7.2.1 The Council is satisfied that the Scheme remains financially viable and capable of delivery.

7.2.2 The Scheme comprises the delivery of 138 affordable homes, comprising 116 Affordable Housing Units and 22 Supported Housing Accommodation Units, together with landscaping, play space, biodiversity enhancements, public realm improvements and supporting infrastructure. The Scheme forms part of the wider regeneration of Harold Hill and has progressed through the Council's appraisal, approval and governance processes.

7.2.3 The Council's development costs, programme and budget assumptions are subject to independent scrutiny through the governance arrangements established for the Havering and Wates Regeneration LLP. Independent cost consultancy and employer's agent support are provided through AtkinsRéalis and Ikon Consultancy, ensuring external review of project costs, delivery assumptions and value-for-money considerations.

7.2.4 The Council does not rely solely upon forecast appraisals or theoretical delivery assumptions in support of viability. Funding has been approved, grant funding has been secured, contracts have been entered into and implementation works have already commenced. Taken together, these matters demonstrate that the Scheme has progressed beyond the planning and appraisal stage and is actively progressing through delivery.

7.2.5 The Council has kept the Scheme costs under review throughout the process, including in relation to construction cost inflation. The approved funding arrangements include appropriate contingency allowances and the Council has entered into contractual arrangements which provide certainty in respect of construction delivery. The Council remains satisfied that sufficient funding is available to implement the Scheme and that there is a reasonable prospect of the Scheme proceeding within a reasonable timescale following confirmation of the Order

## **7.3 Delivery Arrangements**

7.3.1 Delivery of the Scheme is being progressed through the Havering and Wates Regeneration LLP, the Council's joint venture with Wates Residential. The joint venture is governed through established contractual and governance arrangements which provide oversight of programme, design, cost and delivery.

7.3.2 An Early Development Agreement has been entered into and a Pre-Construction Services Agreement is in place to progress technical design, procurement and risk management activities. These arrangements ensure that the Scheme is capable of progressing efficiently from the pre-construction phase into implementation.

7.3.3 Cost and programme oversight are provided through established governance procedures, including independent cost assurance, employer's agent review and reporting through the Council's regeneration governance arrangements. Delivery risks are monitored and managed through these arrangements and the Scheme forms part of the Council's wider regeneration programme.

7.3.4 The Council also benefits from an established track record of delivery through the Havering and Wates partnership, including the successful delivery of other regeneration schemes within the Borough.

## **7.4 Progress Towards Implementation**

7.4.1 Significant progress has already been made towards implementation of the Scheme.

7.4.2 Phase 1 demolition works have been completed, including the demolition of Crediton House, the former Housing Office and properties known as 74-84 Chippenham Road. Demolition contracts have been procured, implemented and completed and expenditure has already been incurred in pursuit of the approved redevelopment.

7.4.3 Substantial progress has also been made in assembling the Order Land. Of the 32 original dwellings within the Scheme area, 30 are now under Council control. Ten leasehold interests have been reacquired, twenty households have been rehoused under the Local Lettings Plan and the freehold of 70 Chippenham Road has been acquired. The Council acquired the freehold interest in the Alderman and acquisition has been agreed with Cubitt Taverns Limited, for their leasehold interest, through an executed option agreement.

7.4.4 The Council's current programme anticipates construction commencing on the vacant part of the site in 2026, with subsequent implementation of the remainder of the Scheme following completion of the land assembly process.

7.4.5 The principal remaining impediment to implementation is the acquisition of the outstanding interests required to facilitate comprehensive redevelopment of the Order Land. The Order is therefore required to provide certainty that the final interests can be secured and implementation can proceed in full.

7.4.6 The Council is satisfied that the Scheme is funded, viable and deliverable.

7.4.7 Planning permission has been secured, funding arrangements are in place, grant funding has been accepted, contractual delivery structures have been established and substantial implementation works have already been undertaken. Significant progress has also been made in assembling the Order Land, with the majority of interests already under Council control.

7.4.8 The Council therefore considers that there is a clear and reasonable prospect that the Scheme will proceed following confirmation of the Order and acquisition of the remaining interests required for implementation. The outstanding interests are the principal remaining obstacle to delivery and the Order is required to facilitate their acquisition and enable the approved redevelopment to be fully implemented.

## **8 Consultations and Negotiations**

### **8.1 Consultation History**

8.1.1 The Council has undertaken extensive consultation and engagement throughout the evolution of the Scheme as part of the preparation of the planning application for the redevelopment of the Order Land, a formal programme of pre-application consultation and community engagement was

undertaken. The consultation was managed by Lexington Communications and is recorded within the Statement of Community Involvement (“SCI”) submitted in support of the planning application. The purpose of the consultation was to provide residents, businesses, visitors and other stakeholders with an opportunity to review the emerging proposals and provide feedback before submission of the planning application.

8.1.2 The consultation process was undertaken in accordance with national planning guidance, the Council’s adopted Statement of Community Involvement and recognised good practice in pre-application community engagement. The consultation was designed to maximise participation and included a combination of face-to-face, online and written engagement opportunities.

8.1.3 The consultation undertaken in support of the planning application comprised two principal stages. The first stage was undertaken between 18 July and 8 August 2023 and sought views on the emerging redevelopment proposals for the Chippenham Road site. The second stage was undertaken between 15 April and 10 May 2024 following further development of the proposals and prior to submission of the planning application.

8.1.4 The consultation programme included community leaflets, local media coverage, online consultation materials, a dedicated consultation website, public exhibitions, social media communications, Council e-bulletins and a dedicated community information telephone line. Consultation materials were made available in both digital and hard-copy formats to maximise accessibility.

8.1.5 The first stage consultation included publicity through leaflet distribution to local residents, local media promotion and publication of consultation materials on a dedicated project website. Public exhibitions were subsequently held at Harold Hill Library on 18 July and 20 July 2023, providing residents and stakeholders with an opportunity to discuss the proposals directly with members of the project team.

8.1.6 The first stage consultation sought views on the emerging vision for redevelopment of the site and invited feedback on matters including:

- the overall redevelopment proposals;
- the principle of providing affordable housing on the site;
- community facilities and public realm improvements;
- shared green spaces and amenity provision;
- local infrastructure and healthcare provision;
- community safety and anti-social behaviour; and
- the future of the Alderman Public House within the wider regeneration proposals.

8.1.7 Following consideration of the first stage consultation, the proposals were developed further and a second phase of consultation was undertaken. This included further leaflet distribution, local media coverage, publication through Council communication channels and social media platforms, continued operation of the dedicated consultation website and the introduction of a Community Information Line through which residents could discuss the proposals directly with members of the project team.

8.1.8 Public consultation events were held at Harold Hill Library on 25 April and 27 April 2024 and were attended by representatives of the project team. A scale model of Harold Hill Town Centre and

supporting exhibition material were displayed to assist understanding of the proposals and the wider regeneration programme.

8.1.9 The second stage consultation sought views on the evolved proposals, including:

- the delivery of 138 affordable homes;
- the proposed mix and type of accommodation;
- wheelchair accessible housing provision;
- shared amenity and green spaces;
- the proposed community garden;
- play space and recreational facilities;
- community safety measures;
- parking and transport considerations;
- local infrastructure and services; and
- the future of the Alderman Public House and replacement community facilities.

8.1.10 The consultation programme engaged local residents, leaseholders, businesses, shoppers, visitors to Harold Hill Town Centre and other interested stakeholders. Feedback was gathered through public exhibitions, online consultation material, written questionnaires, website responses and direct discussions with members of the project team.

8.1.11 In addition to the pre-application consultation programme, statutory consultation was undertaken as part of the planning application process. Neighbour notification letters, site notices and consultation with statutory consultees were carried out in accordance with planning legislation and the Council's adopted Statement of Community Involvement. Comments received through that process were taken into account by the Local Planning Authority in determining the planning application.

## **8.2 Vacant Possession Negotiation**

8.2.1 Since 2019, the Council, through its appointed land and property advisers, Ardent, has sought to acquire the interests required to facilitate the Scheme by agreement wherever possible.

8.2.2 The Council's overarching strategy has been to secure the acquisition of land and property interests through private treaty negotiations and to avoid the need for compulsory acquisition wherever agreement can reasonably be reached. Compulsory purchase powers have therefore been pursued as a means of ensuring delivery certainty and not as a substitute for negotiation.

8.2.3 Throughout the development of the Scheme the Council has engaged directly with affected owners, occupiers and their professional advisers, where those parties have been willing to do so. Negotiations have included discussions relating to valuation, compensation, relocation and acquisition terms, with the Council seeking wherever possible to resolve matters through agreement rather than compulsion.

8.2.4 The success of this approach is demonstrated by the substantial progress that has been made in assembling the Order Land. As set out elsewhere in this Statement, the vast majority of interests required to facilitate the redevelopment have already been acquired by agreement or otherwise resolved, enabling significant demolition and site clearance works to be undertaken. The Council

therefore considers that its acquisition strategy has been successful in securing voluntary acquisitions wherever possible.

8.2.5 In circumstances where negotiations have not resulted in agreement, the Council has continued to seek constructive engagement. This has included offering opportunities for direct meetings with Council representatives and professional advisers, together with the use of alternative dispute resolution mechanisms where appropriate. In particular, the Council has offered the opportunity for independent expert determination of valuation matters in circumstances where agreement could not otherwise be reached.

8.2.6 The Council remains committed to ongoing negotiation and continues to seek the voluntary acquisition of all outstanding interests, where practicable.

### **8.3 Rehousing of Secure Tenants**

8.3.1 The Council has placed significant emphasis on supporting residents affected by the Scheme and has adopted a comprehensive approach to rehousing secure tenants whose homes are required for redevelopment.

8.3.2 The rehousing process has been undertaken in accordance with the Council's adopted Local Lettings Plan, which forms part of the Council's Housing Regeneration Programme and establishes the rehousing options, allocation principles and procedures applicable to council tenants affected by estate regeneration schemes, including the Chippenham Road redevelopment.

8.3.3 The principal objectives of the Local Lettings Plan is to facilitate the timely delivery of regeneration schemes, fairly manage the rehousing process, improve housing conditions and help create sustainable communities within regeneration areas.

8.3.4 Under the Local Lettings Plan, affected secure tenants are supported through a structured rehousing process involving one-to-one engagement, assessment of housing needs, consideration of household circumstances and identification of suitable alternative accommodation. The rehousing process takes account of matters including household composition, medical and mobility needs, support networks, schooling requirements and location preferences.

8.3.5 The Local Lettings Plan provides a range of rehousing options for affected tenants, including:

- relocation to an existing Council property elsewhere within the Borough;
- relocation to a Housing Association property;
- relocation to sheltered or extra care accommodation where appropriate;
- support for low-cost home ownership options;
- assistance in securing accommodation within the private rented sector; and
- the opportunity, where eligible, to return to a newly constructed property within the redevelopment programme once completed.

8.3.6 The Local Lettings Plan also provides affected tenants with enhanced rehousing priority, dedicated officer support and rights of review and appeal throughout the rehousing process.

8.3.7 The Council considers that the rehousing programme has been highly successful. All secure tenants whose homes have been required for the redevelopment have been successfully rehoused by the Council with the exception of Ms Bennett, whose circumstances are addressed separately within this Statement.

8.3.8 The successful relocation of the remaining tenant households has enabled the Council to secure vacant possession of the substantial majority of the residential properties required for redevelopment and has facilitated the demolition and site clearance works which have already taken place.

8.3.9 The Council considers that the rehousing outcomes achieved demonstrate its commitment to supporting affected residents throughout the regeneration process and ensuring that individuals are treated fairly and appropriately as part of the delivery of the Scheme.

8.3.10 A summary of key engagement with each of the three objectors is detailed below. This is designed to provide an overview and further details will be submitted in evidence to the Public Inquiry.

#### **8.4 Ms Kerry Bennett - 70 Chippenham Road**

8.4.1 On 21st March 2025, a letter from The Council was sent to Ms Bennett by recorded delivery, requesting for a home visit at the Property on 28th March 2025. The purpose of the visit was to advise Ms Bennett of the impending transfer of ownership from her old landlord London & Quadrant to London Borough of Havering and advise The Defendant on the Council's regeneration process. Prior to the Council acquiring the Property, we understand that London & Quadrant had been attempting to obtain vacant possession of the property by offering the Defendant alternative accommodation.

8.4.2 On 28th March 2025, The Council visited Ms Bennett at the Property however, she was not at the Property. On returning to the office, an email had been received from Ms Bennett advising of her receipt of letter proposing a visit which she said arrived after the date and time specified in the letter.

8.4.3 Following a period of discussions with the freeholder, on 2 June 2025 The Council completed the freehold acquisition of 70 Chippenham Road, subject to the extant tenancy in favour of Ms Bennett.

8.4.4 On 5th June 2025, The Council wrote to Ms Bennett proposing a home visit to the Property to discuss regeneration moves and available housing options with a housing colleague. On 6th June 2025, Ms Bennett replied to the correspondence requesting engagement with an alternative officer and a neutral meeting location.

8.4.5 On 9th June 2025, The Council attended an in-person meeting with Ms Bennett at Harold Hill Library to discuss options for facilitating a move from the Property. Ms Bennett spoke on the difficulties she faced with London and Quadrant and stated she was unable to stay in Havering due to feeling vulnerable in the borough. The Council advised on the Claimant's accommodation offer in accordance with the Local Lettings Plan however Ms Bennett was uninterested, reiterating she was unable to stay in the borough. The Council queried on the preferred choice of offer. Ms Bennett replied the purchase of a modular home for her by the Council which could be sited at the back of a property purchased by her daughter. The Council advised this was not part of the accommodation offer due to the Council not offering modular homes as permanent accommodation. The Council advised further that such requests fell outside the Local Lettings Plan and thus would require senior approval. It was agreed that the option would be explored with feedback given in due course.

8.4.6 On 10th June 2025, Havering Borough Council sent a follow-up email summarising the actions discussed at the meeting, including exploration of modular housing options and liaison with other authorities.

8.4.7 On 11 June 2025, Ms Bennett responded stating that she did not consider weekly contact necessary and would update when her circumstances changed.

8.4.8 On 7 July 2025, Havering Borough Council emailed Ms Bennett to seek an update regarding her circumstances and referenced the impending redevelopment works at Chippenham Road. Ms Bennett replied stating that no progress had been made and that she was awaiting information regarding modular home options.

8.4.9 On 12 August 2025, Havering Borough Council wrote to Ms Bennett confirming that the modular or mobile home proposal had been considered by senior management but was not agreed. In discussions with senior management the purchase of a modular home was declared as outside of the offer framework of the Local Lettings Plan leaving the Council vulnerable to similar requests or legal challenge by way of precedent. On the same day, Ms Bennett wrote back to express her disappointment in the decision.

8.4.10 On 17 September 2025, Havering Borough Council emailed Ms Bennett with a follow up email explaining the Council's position with reference to its regeneration plans and what that means for the Property. The Council reminded Ms Bennett of the Council's regeneration commitment and asked her to consider subsequent offers.

8.4.11 On 16 October 2025, Havering Borough Council issued their first formal offer of accommodation at 74 Sedgefield Crescent, Romford, RM3. Ms Bennett subsequently responded stating that she was unable to accept the offer based on reasons set out in the meeting of 9th June 2025.

8.4.12 On 28 November 2025, Havering Borough Council issued the Council's second and final formal offer of accommodation under the Regeneration Programme at 122 Chelmsford Avenue, Romford, RM5. The contents of the offer advised that the Council would issue a Notice of Seeking Possession (NoSP) if the offer was unreasonably refused.

8.4.13 On 3 December 2025, Ms Bennett responded stating that she was unable to accept this offer. Ms Bennett went on to state the Council had made the offer of a modular home and snatched it away. The Council would like to confirm that a modular home was never offered to Ms Bennett. Ms Bennett accused the Council of pressuring her to move with speed. Ms Bennett cited letters from a Freedom of Information (FOI) request advising the Council were meant to assist with a move in 2019 though during this time the Defendant was under the management of London and Quadrant. The Council has no information pertaining to said letters.

8.4.14 On 3 December 2025, a formal request for service of NoSP was requested.

8.4.15 On 14 January 2026, a NoSP was served at the Property by the Council's Housing Officer. This was hand delivered to the Property. The Officer confirmed she spoke to Ms Bennett via a 'ring doorbell' intercom system on the service of the notice. Photographs were taken to evidence the hand delivered method. The notice was set for expiry on 15 February 2026.

8.4.16 On 23 January 2026, Havering Borough Council issued a further discretionary formal offer of accommodation at 137 Harrow Crescent, Romford, RM3. The offer requested Ms Bennett to issue the Council with a decision by 15 February 2026 and advised that unreasonable refusal would result in legal proceedings to seek possession of the Property. To date, the Property at 137 Harrow Crescent remains available.

8.4.17 On 13 February 2026, Ms Bennett responded stating that her circumstances had not changed and that she was unable to accept the offer.

## **8.5 Tolu Olubanjo - 10 Rothbury House**

8.5.1 On 20th July 2020, Havering Borough Council offered to buy back 10 Rothbury House to Ms Tolu Olubanjo via email.

8.5.2 On 28th April 2021, a telephone call was had between Ardent on behalf of The Council and Ms Olubanjo to arrange a valuation inspection. Following the telephone discussion, an inspection of the property took place on 4 May 2021. During this meeting, Ardent explained the regeneration proposals and the compensation framework available under the Compensation Code, including market value, a Basic Loss Payment, and reimbursement of reasonable professional and relocation-related costs. Ms Olubanjo confirmed that the property was tenanted and would be vacated once terms were agreed.

8.5.3 On 17th May 2021, Ardent issued an offer letter via email to purchase 10 Rothbury House on behalf of The Council to Ms Olubanjo. Chasers were complete by Ardent to Ms Olubanjo regarding the offer on 25th May 2021 and 8th June 2021. On 11th June 2021, Ms Olubanjo and Ardent had a telephone call where Ms Olubanjo advised that the offer was 'not enough' and needs to seek tax advice. Ms Olubanjo advised that this case is not high up on her list of things to do as she is 'extremely busy'. Ardent did advise that the Council will be prepared to cover the reasonable fees of a surveyor to act on her behalf. Ms Olubanjo said that she does not have the energy to discuss the case at the moment and due to the on-going delays of over 2 years. Ms Olubanjo said that if she must go down the CPO route, she will get that price that she is seeking.

8.5.4 On 26 September 2022, Ardent had a phone call with Ms Olubanjo regarding the revised offer. Ms Olubanjo updated that she was seeking her own professional advice.

8.5.5 On 10 October 2022, Ardent issues revised HoTs via email with the increased market value. Ms Olubanjo acknowledges the revised HoTs via email on 13th October 2022.

8.5.6 On 4th August 2023, J&P, on behalf of the Council, reiterated the Council's offer to buy back 10 Rothbury House via letter.

8.5.7 On 19th September 2023, Ms Olubanjo sent an email to the Council objecting to the demolition of Rothbury House, as she still owned number 10. Ms Olubanjo also stated that, in order to proceed with selling 10 Rothbury House, the Council needed to remove all CCJs against her so that she could purchase an onward property.

8.5.8 On 9th February 2024, Ms Olubanjo sent an email to the Council updating them on her change of address to 12 Old Bond Street, W1S 4PW. Her email address remained the same. Ms Olubanjo stated that she would not accept documents served via email as legal service and that only hard-copy documents sent by post to the updated address would be deemed legally served. On 12th February 2024, the Council confirmed receipt and updated their records with the new correspondence address.

8.5.9 On 6th March 2024, issued a letter to Ms Olubanjo reiterating its offer to purchase 10 Rothbury House. The letter was sent to 12 Old Bond Street. Ms Olubanjo responded on 29th July 2024 via email, stating that she would not consider a sale back to the Council until the CCJs were resolved.

8.5.10 On 8th March 2024 Closure Order granted for 3 months, expired 7th June 2024.

8.5.11 On 6th June 2024, The Council issued a copy of the extension to the Closure Order via email. Extended Closure Order expires 5th September.

8.5.12 On 14th June 2024, Ardent issued an offer letter via Email to Ms Olubanjo. This was followed up with a phone call from Ardent to Ms Olubanjo on the 30th July 2024, where Ms Olubanjo advised she is unwilling to sell the property until the CCJ matter is resolved, Ardent reiterated that the offer remains open for acceptance. Ardent followed up with an email on 8th August 2024 with the offer-letter and reiterated the conversation and asked for confirmation regarding the CCJ's. Ms Olubanjo responded on the same day that she expects to be compensated for any time spent dealing with the matter, stating a minimum day rate of £650. She explained that she has caring responsibilities for two dependents and limited time to dedicate to the case. She also raised concerns regarding a closure order, stating that she had not been informed of it or provided with written notice of any extension, and alleged that The Council is in breach of its lease obligations. She concluded by advising that she would require payment in advance for any future communications and that a lack of response should be understood in that context.

8.5.13 On 14th October 2024, the Council sent a letter to Ms Olubanjo at 12 Old Bond Street with its offer to buy back 10 Rothbury House.

8.5.14 On 15th October 2024, Ms Olubanjo sent an email to Margaret Mullane MP to highlight the issues she had experienced with the Council and its handling of her property at 10 Rothbury House. The same email was also sent separately to Councillor Ray Morgan. On 16th October 2024, this correspondence was forwarded by a caseworker for Margaret Mullane MP to Havering Borough Council. On 18th October 2024, the Council responded to Ms Olubanjo, offering to raise her concerns as a formal complaint against the Council. Ms Olubanjo responded on 18th October 2024, reiterating her position that she believed the Council had stolen her property.

8.5.15 On 22nd October 2024, Ms Olubanjo sent an email to Councillor Ray Morgan and Havering Borough Council, copying in Margaret Mullane MP, stating her belief that the Council had stolen her property. On 23 October 2024, the Council acknowledged the correspondence and, later that day, Ms Olubanjo stated that she would not engage in any buyback negotiations until she had been compensated for losses arising from the Closure Order. On 24 October 2024, The Council responded, explaining that the Closure Order had been granted by the Magistrates' Court to address antisocial activity, denying that the Council had stolen the property, confirming that Ms Olubanjo remained the leaseholder, and stating that any claim for losses incurred during the Closure Order period should be pursued through the Magistrates' Court. On 4 November 2024, Ms Olubanjo chased both the promised response and payment, criticising the delays, while the Council issued a holding response later that day, advising that further information was awaited and that the payment was expected that week. On 5 November 2024, Ms Olubanjo rejected the holding response, repeated allegations of unlawful conduct, and requested intervention from the Chief Executive. Later that evening, The Council provided a full response to the enquiry submitted through Margaret Mullane MP, explaining that the Council had been seeking to acquire the property as part of the Harold Hill regeneration scheme since 2019, that the current buyback offer remained voluntary and negotiable, and that compensation relating to the Closure Order remained a matter for the Magistrates' Court. The Council also confirmed that planning and demolition notifications had been properly issued and that arrangements were being made to provide access to the property. On 6 November 2024, Ms Olubanjo rejected the Council's response, maintaining that the Council had unlawfully taken possession of her property and failed to compensate her for rent losses, security door costs, and statutory interest. She disputed the Council's position regarding planning and demolition notices, argued that the Council's offer to arrange access demonstrated that it remained in possession of the property, and requested that Chief Executive, Andrew Blake-Herbert take personal responsibility for

the matter, provide a direct response, and arrange a face-to-face meeting. She also stated that the correspondence might be relied upon in future legal proceedings.

8.5.16 On 25th October 2024, the Council emailed Ms Olubanjo following a verbal conversation between the parties on the same date, during which Ms Olubanjo outlined her views on a variety of matters relating to 10 Rothbury House. In the email, The Council offered to make a payment for loss of rent. On 29th October 2024, Ms Olubanjo responded via email, stating that the offer for loss of rent was too low compared with her actual losses. The Council responded via email on 1st November 2024, stating that the amount offered was in full and final settlement and that any additional compensation claim should be made through the Magistrates' Court. Ms Olubanjo responded on 1st November 2024, reiterating her claim for compensation. On 7 November 2024, the Council reiterated that it was not liable for rent losses during the Closure Order, confirmed that the £3,541.67 payment had been authorised, rejected claims for interest, distress, and security door costs, and advised that steps were being taken to provide direct access to the property. The Council also rejected allegations of illegality and stated that any meeting would require a clear purpose before being arranged.

8.5.17 Ardent emailed Ms Olubanjo on the 6 November 2024 on LBH's instructions with a without prejudice offer for the leasehold interest in full and final settlement of all matters. The offer stated that it remained open for 28 days. The email also strongly advised for Ms Olubanjo to obtain professional advice, with reasonable fees to be reimbursed if agreed in advance. Ms Olubanjo responded on the same day, advising that she has told the Council, including the CEO that she will not consider talking about any purchase when the Council had 'stolen' the property, 'repossessed it and refused to return it'. Ardent acknowledged receipt of this email on 27th November 2024.

8.5.18 On 14th November 2024, Ms Olubanjo issued a letter to the Council stating that it was her final letter seeking payment of compensation before referring the matter to court. On 15th November 2024, OneSource, the Council's legal advisers, sent an acknowledgement letter to Ms Olubanjo at 12 Old Bond Street. Ms Olubanjo sent a further chaser letter on 21st November 2024.

8.5.19 In a letter dated 21 March 2025, the Council confirmed that Ms could access 10 Rothbury House and provided the relevant access codes. The Council advised that a payment would be made for loss of rent, without admitting liability and with no further rent-loss payments anticipated. The letter also confirmed that the property had been broken into and damaged, that security doors had been reinstated, and that the Council's buyback offer remained open. The Council noted that, as an enhanced offer was made to conclude matters, compensation could be lower if the matter proceeded by way of a Compulsory Purchase Order and offered a virtual meeting to discuss the matter further.

8.5.20 On 11 June 2025, the Housing Ombudsman acknowledged the complaint raised by Ms Olubanjo. On 8th August 2025, Ms Olubanjo submitted her evidence to the Ombudsman. On 26th August 2025, the Housing Ombudsman issued its First Contact letter and requested action from the Council. The Council responded on 28th August 2025.

8.5.21 On 29 August 2025, the Council invited Ms Olubanjo to attend a meeting with senior Council officers regarding 10 Rothbury House and proposed dates in September and October. On 1 September 2025, Ms Olubanjo requested clarification of the meeting's purpose and agenda, and on 2 September 2025, the Council advised that the agenda would focus on the proposed purchase of the property and any issues Ms Olubanjo wished to raise. On 3 September 2025 and again on 5 September 2025, Ms Olubanjo responded that she would not discuss any sale until her complaints had been resolved, including compensation for losses arising from the Closure Order, alleged

unlawful repossession and denial of access, service charge disputes, CCJs, and her formal complaint. On 10 September 2025, Havering Borough Council provisionally scheduled a meeting for 13 October 2025, and on 12 September 2025 Ms Olubanjo disputed that the meeting had been confirmed and insisted on a revised agenda. Later that day, Havering Borough Council issued a revised agenda placing Ms Olubanjo's complaints and compensation concerns ahead of any discussion regarding a sale. On 10 October 2025, Havering Borough Council confirmed arrangements for the meeting; however, on 12 October 2025, Ms Olubanjo postponed it due to a family emergency and requested that Havering fund legal and tax advisers before any negotiations progressed. On 31 October 2025, Havering Borough Council proposed replacement meeting dates of 17 November and 24 November 2025, provided details of approved valuers and solicitors, and confirmed that the Council would fund reasonable legal and tax advice relating to a sale. On 12 November 2025, Ms Olubanjo advised that one proposed date was unsuitable and maintained that legal representation and resolution of her complaints were required before any meeting. On 25 November 2025 and 2 December 2025, Havering Borough Council followed up, providing further details of approved advisers and proposing meeting dates of 15 December and 17 December 2025, but no meeting was agreed. On 2 February 2026, Havering Borough Council proposed new meeting dates of 19 March or 31 March 2026, confirmed that the Council's buyback offer remained open, and reiterated that legal and valuation costs would be covered. Havering Borough Council followed up again on 17 February 2026, requesting confirmation of attendance, and on 16 March 2026 made a final request for confirmation, reiterating that Ms Olubanjo remained the legal owner of the property, that the Council had previously paid compensation for rent loss, and warning that, as an enhanced offer had been made, the progressing Compulsory Purchase Order could result in lower compensation than the current voluntary buyback offer. Throughout the correspondence, Havering Borough Council sought to arrange a meeting and progress a voluntary acquisition of the property, while Ms Olubanjo consistently maintained that compensation, access issues, and her wider complaints should be resolved before any sale negotiations could proceed.

8.5.22 On 28th August 2025, Ardent emailed Ms Olubanjo to provide an update on Phase Two of the Harold Hill Town Centre Regeneration where demolition works at Chippenham Road began on 12 August 2025. Ardent confirmed that the Council remain committed to purchase 10 Rothbury House and offered to meet either in person, MS Teams or by a telephone call at a mutual time. Ardent asked for Ms Olubanjo to confirm availability in September 2025 so a meeting can be arranged ASAP.

8.5.23 On 4th December 2025, Ardent issued a letter via email to inform her that the Council has now made a CPO and how this will affect her but they remain committed to reaching a private treaty agreement if possible.

8.5.24 Ardent issued Land Interest Questionnaires on 16th December 2025 to 6 different correspondence addresses held on file, with chasers sent on 15th January 2026.

8.5.25 On 27th February 2026, Havering Borough Council sent Ms Olubanjo the service charge estimate for the period 1 April 2026 to 31 March 2027.

8.5.26 On 15th April 2026, London Borough of Havering sent the CPO making letter.

8.5.27 Objection received to the CPO on 15th May 2026.

## **8.6 Stonegate / Unique Pub Properties Theta Ltd - The Alderman**

8.6.1 The London Borough of Havering Council, through its appointed agents Ardent Management, has sought to acquire the head leasehold interest in The Alderman Public House by agreement since

2019. Extensive negotiations have been undertaken over a period exceeding six years in an effort to avoid the need for compulsory acquisition.

8.6.2 Initial discussions commenced on 13 September 2019 when Dimitris Themistocli of Ardent spoke with Richard Sherriff, Estates Manager for the head leaseholder, regarding the Council's proposals for the regeneration of Harold Hill Town Centre. On 14 September 2019, Ardent confirmed in writing that it had been instructed by the London Borough of Havering to acquire all interests in The Alderman and that the Council's preference was to secure those interests through negotiation rather than through compulsory purchase powers.

8.6.3 Throughout the period between November 2019 and January 2020, Ardent sought the lease documentation and property information required to assess the head leaseholder's interest and formulate a compensation offer. Following requests on 21 November 2019, 2 December 2019, 19 December 2019, 6 January 2020 and 13 January 2020, the Council provided formal authority confirming Ardent's instructions and continued to seek disclosure of lease documentation to permit a valuation assessment to be undertaken. During this period, the head leaseholder also sought confirmation regarding the acquisition of the freehold interest by the Council, which was confirmed by Ardent on 15 January 2020.

8.6.4 Having obtained sufficient information to undertake a valuation assessment, Ardent issued a formal offer letter on 3 March 2020. The offer comprised a Market Value payment, a Basic Loss Payment, and reimbursement of reasonable professional fees. The offer was subsequently chased on 17 March 2020, 26 March 2020, 6 April 2020 and 26 May 2020, but no substantive response was received. Consequently, the offer was reissued on 27 August 2020 on the same terms.

8.6.5 On 15 September 2020, Piers Collacott of Gateley Hamer advised that he had been instructed to act on behalf of the head leaseholder. Between 25 September 2020 and 6 November 2020, extensive correspondence took place concerning the scope of professional advice required and the Council's agreement to fund the reasonable costs of the leaseholder's professional advisers. The Council agreed an initial indemnity of £5,000 plus VAT to enable the preparation of a compensation assessment and reasoned claim.

8.6.6 At the request of the leaseholder's advisers, the Council subsequently provided extensive background information concerning the regeneration proposals, programme and anticipated use of compulsory purchase powers. Correspondence on 11 November 2020, 12 November 2020 and 9 December 2020 included requests for information relating to the Council's regeneration programme, Cabinet decisions and anticipated compulsory purchase timetable, all of which the Council sought to provide in order to facilitate informed negotiations.

8.6.7 Despite agreeing funding for professional advice, progress remained limited due to difficulties in obtaining instructions from the leaseholder. Between 15 December 2020 and 12 February 2021, Ardent repeatedly contacted both the leaseholder and its advisers seeking confirmation of instructions and requesting progress on preparation of a compensation assessment. Chaser correspondence was issued on 11 January 2021, 25 January 2021, 4 February 2021 and 12 February 2021, whilst the leaseholder's advisers repeatedly confirmed they had yet to receive firm instructions from their client.

8.6.8 Further progress was made during spring and summer 2021. Following discussions in April 2021, the Council agreed to fund the appointment of a specialist licensed premises valuer. On 26 April 2021, the Council confirmed it would meet the costs of that appointment within the agreed indemnity arrangements. During June 2021, formal instructions were provided to the specialist valuer and the Council agreed to fund the valuation exercise. The valuation inspection ultimately

took place prior to 27 July 2021, with Gateley Hamer confirming on that date that inspection had been completed. On 16 August 2021, the leaseholder's advisers advised that they had received the specialist valuation report.

8.6.9 Notwithstanding receipt of that report, no substantive compensation claim was forthcoming for a considerable period. Throughout September 2021, October 2021 and November 2021, the Council continued to request disclosure of the valuation evidence and sought to progress negotiations. The Council also provided further information regarding the scheme programme, including on 15 November 2021, when it advised that a planning application was expected during 2022 and that redevelopment works were anticipated to commence in 2023. On 7 December 2021, the Council additionally indicated a willingness to consider a new lease arrangement with a redevelopment break clause to enable the public house to continue trading for as long as possible.

8.6.10 Negotiations continued throughout 2022. On 17 March 2022, the leaseholder's advisers advised that discussions were taking place with the publican and Stonegate regarding a potential tripartite agreement. On 26 May 2022, the Council proposed additional fee funding arrangements and offered a meeting with representatives of the Council and its advisers to discuss the regeneration programme and acquisition process. By 12 October 2022, however, the Council noted that little substantive progress had been made in over two years since the appointment of advisers.

8.6.11 A detailed compensation claim was eventually submitted by Gateley Hamer on 5 May 2023. The claim advanced compensation for the head leasehold interest of approximately, comprising Market Value, Disturbance Compensation, Basic Loss Payment and refinancing costs. The Council subsequently reviewed the claim and considered the valuation information provided.

8.6.12 Following further analysis and updated trading information, negotiations intensified during 2025. On 23 May 2025, the Council acknowledged that revised financial information had resulted in an increase in the leaseholder's valuation assessment and advised that it was reviewing how best to advance negotiations whilst continuing to pursue a private treaty acquisition. On 12 August 2025, the Council reiterated its desire to reach agreement and confirmed that it had obtained forensic accounting advice to assist in reviewing the compensation claim.

8.6.13 Having reviewed the evidence available, the Council issued an enhanced offer on 26 September 2025. This offer proposed an "all-in" settlement figure and included detailed reasoning as to why the Council could not support the higher valuation methodology advanced by the leaseholder's advisers. Following a lack of substantive progress, a further letter was issued on 12 November 2025. In addition to maintaining negotiations, the Council proposed Alternative Dispute Resolution ("ADR") as a means of resolving the valuation dispute.

8.6.14 The leaseholder's advisers responded on 3 December 2025, indicating a willingness in principle to engage in mediation subject to certain conditions. The Council continued discussions and, by letter dated 24 December 2025, renewed its proposal for ADR, whilst also offering the opportunity for the leaseholder to occupy a replacement public house within the regeneration area. The leaseholder's advisers responded on 9 January 2026, confirming that their client was receptive to third-party dispute resolution but maintained reservations regarding the Council's valuation evidence.

8.6.15 On 11 February 2026, the Council held a MS Teams meeting with the leaseholder's adviser and senior representatives of the Council. A further meeting with the same group of people took place on 26 February 2026.

8.6.16 Despite this divergence in valuation positions, the Council continued to seek agreement. On 7 April 2026, the Council formally acknowledged that the principal issue between the parties was a fundamental disagreement regarding valuation rather than any unwillingness to negotiate. In the same correspondence, the Council reaffirmed its standing offer, confirmed that it remained committed to securing agreement by private treaty and noted that its offers had been reviewed and enhanced over time as further information had become available. The Council also proposed referral of the dispute to binding independent expert determination.

8.6.17 Notwithstanding these efforts, agreement could not be reached. On 14 May 2026, the head leaseholder submitted a formal objection to the Compulsory Purchase Order. However, the chronology demonstrates sustained engagement by the Council over a period commencing in September 2019 and continuing through to the making of the Order. During that period the Council made formal acquisition offers, funded the leaseholder's professional advisers, funded specialist valuation advice, provided detailed regeneration and programme information, considered revised compensation claims, enhanced its financial offer, explored relocation opportunities and proposed expert determination. Despite these extensive efforts, the parties remain substantially apart on valuation, such that compulsory acquisition remains necessary to facilitate delivery of the regeneration scheme.

## **9 Human Rights and Equality**

9.1 In making the Order, the Council has had regard to the provisions of the Human Rights Act 1998 and the European Convention on Human Rights ("the ECHR"), in particular those Articles that are relevant to the exercise of compulsory purchase powers. The Council is satisfied that the interference with the rights of those with an interest in the Order Land is necessary, proportionate and justified in the public interest.

9.2 Article 1 of the First Protocol ("A1P1") of the ECHR provides that every natural or legal person is entitled to the peaceful enjoyment of their possessions and that no one shall be deprived of their possessions except in the public interest and subject to the conditions provided for by law. Any interference with this right must therefore strike a fair balance between the public interest in achieving the objectives of the Order and the private rights of those affected.

9.3 Article 6 of the ECHR guarantees the right to a fair and public hearing within a reasonable time by an independent and impartial tribunal in the determination of a person's civil rights and obligations. This right is fully protected in the CPO process, as all parties affected by the Order will have the opportunity to make representations, to appear at any public inquiry, and to challenge decisions through the courts in accordance with the statutory procedure.

9.4 Article 8 of the ECHR provides that everyone has the right to respect for their private and family life, their home and correspondence. The Council acknowledges that the making and implementation of the Order may interfere with the rights of certain occupiers under Article 8; however, such interference will be proportionate, lawful and necessary to achieve the legitimate public purpose of delivering the Scheme.

9.5 The Council has taken careful account of the potential impact of the Order on the individuals and businesses affected. Extensive engagement has been undertaken to secure voluntary acquisition and to offer advice and assistance to occupiers in identifying suitable alternative accommodation.

9.6 The statutory compensation regime provides a further safeguard for those whose interests are compulsorily acquired. Compensation will be payable in accordance with the Compulsory Purchase

Act 1965, the Land Compensation Act 1973 and the relevant case law, ensuring that claimants receive fair and equivalent compensation for any property or rights acquired and for any losses sustained.

9.7 The Council has balanced the public interest in the regeneration and improvement of the area against the private loss that will result from the compulsory acquisition of interests in the Order Land. Having regard to the availability of statutory compensation and the opportunity for affected parties to make representations, the Council considers that the interference with individual rights is proportionate and justified.

9.8 The Council is therefore satisfied that the making and confirmation of the Order would not infringe the rights of any individual under Articles 1, 6 or 8 of the ECHR. In the event of any interference, such interference would be in accordance with the law, pursue a legitimate aim and be necessary in a democratic society in the interests of the economic, social and environmental well-being of the area.

9.9 The Council further concludes that the Order strikes an appropriate balance between the rights of those directly affected and the need to secure the delivery of a scheme which will bring significant and lasting public benefits. Accordingly, the Council is satisfied that the Order is compatible with the ECHR and with the Human Rights Act 1998.

9.10 In preparing and promoting the Order, the Council has had full regard to its duties under Section 149 of the Equality Act 2010 (the Public Sector Equality Duty – “PSED”). The Council has considered the need to: (a) eliminate unlawful discrimination, harassment and victimisation; (b) advance equality of opportunity between persons who share a protected characteristic and those who do not; and (c) foster good relations between such persons.

9.11 To inform its decision-making, the Council has commissioned and reviewed an Equality Impact Assessment (EqIA) prepared by Iceni Projects Limited in April 2025 on behalf of Havering and Wates Regeneration LLP. The EqIA assessed the potential impacts of the Scheme on persons with protected characteristics, with reference to the demographic, socio-economic and health profile of the area, and identified appropriate mitigation and enhancement measures.

9.12 The EqIA concludes that the Scheme will generate significant positive equality outcomes once completed, particularly for groups experiencing housing disadvantage, deprivation or safety concerns. Key positive impacts include:

- Delivery of 138 affordable homes, all at London Affordable Rent or equivalent tenure, directly addressing the acute shortage of accessible, affordable and secure housing in the Borough;
- Provision of 22 Supported Housing Accommodation Units (representing approximately 16% of the total homes), delivering safe, managed accommodation for individuals requiring tailored support and contributing to the Borough’s supported-living objectives;
- Delivery of 14 wheelchair-adaptable homes (10%) and full compliance with inclusive design standards, improving accessibility for residents with disabilities;
- Creation of new open space, play space and a community garden designed to promote inclusion, physical activity, and mental well-being; and

- Improved lighting, defensible planting and natural surveillance throughout the site to address community safety concerns, benefiting women, older residents, and those with disabilities.

9.13 During construction, the EqIA identifies limited and temporary potential for adverse impacts associated with noise, air quality and access disruption. These impacts will be mitigated through the implementation of a Construction Environmental Management Plan (CEMP) and continued community engagement to ensure that residents, including vulnerable groups, are informed and supported throughout the construction period.

9.14 The EqIA further recognises the socio-economic context of the area, which lies within the second decile of national deprivation, with particularly high indicators of income and education deprivation. The Scheme will therefore have a proportionately greater positive impact on local equality outcomes by increasing the supply of affordable housing, creating local employment opportunities, and improving the overall quality and safety of the built environment.

9.15 The Council has had due regard to these findings in making the decision to promote the Order. The equalities implications were considered and recorded as part of the Cabinet decision to make the CPO, ensuring that equality considerations have been integrated throughout the process rather than treated as a separate or subsequent exercise.

9.16 The Council is satisfied that the Scheme does not give rise to any disproportionate or discriminatory effects on persons with protected characteristics. Where differential impacts have been identified such as during the construction phase, appropriate and proportionate mitigation measures will be implemented to minimise disruption and promote positive equality outcomes.

9.17 Accordingly, the Council concludes that due regard has been given to the requirements of the Public Sector Equality Duty and that the Scheme will advance equality of opportunity and foster good relations between people in the community. The making and confirmation of the Order is therefore compatible with the Council's statutory obligations under the Equality Act 2010.

9.18 The scheme will result in the loss of an existing public house and associated community space. This loss is acknowledged; however, it is considered acceptable in the circumstances, having regard to the wider regeneration context and the public benefits delivered by the scheme.

9.19 Provision for a replacement public house facility is proposed within the wider Harold Hill Masterplan Vision. In particular, a new public house is included as part of the wider development which received a resolution to grant planning permission from the London Borough of Havering on 13 November 2025. Accordingly, while the existing facility will be lost as a consequence of the Order scheme, the masterplan proposals make provision for the re-introduction of a public house and community facility within the area. When considered alongside the significant public benefits of the scheme, including comprehensive regeneration and the delivery of new homes and associated infrastructure, the loss of the existing public house and community space is not considered to outweigh the overall public interest case.

9.20 The potential equalities impacts arising from the loss of the public house and community space have been considered through the Equality Impact Assessment. The EqIA concludes that, while there may be localised impacts on certain groups, appropriate mitigation measures are available and the overall impacts are justified by the substantial public benefits of the scheme.

## **10 Well-being Considerations**

## **10.1 Social wellbeing**

10.1.1 The Council considers that the Scheme will make a substantial contribution towards the promotion and improvement of the social wellbeing of the area.

10.1.2 The most significant social benefit arising from the Scheme is the delivery of 138 affordable homes, comprising 116 Affordable Housing Units and 22 Supported Housing Accommodation Units. The Scheme will replace a low-density development of 32 existing dwellings and will make a significant contribution towards meeting identified housing needs within the Borough. The affordable housing and Supported Housing Accommodation will be secured through the Section 106 Agreement.

10.1.3 The approved development includes a mix of one, two, three and four-bedroom homes, providing accommodation suitable for a wide range of household types and needs. The Scheme will therefore increase housing choice and contribute towards addressing the Borough's identified need for affordable housing.

10.1.4 A particularly important element of the Scheme is the provision of 22 specialist homes for care leavers. The Council recognise that this accommodation responds to a specific and identified housing need and is unlikely to be delivered through a conventional market-led development. The Scheme will therefore make an important contribution towards supporting young people transitioning from care into independent living.

10.1.5 The Scheme will also deliver substantial improvements in housing quality. During preparation of the planning application, the Council assessed options for retaining and refurbishing the existing residential buildings. That assessment identified a number of limitations associated with the existing housing stock, including poor thermal performance, lack of step-free access, low internal floor-to-ceiling heights and failure to meet modern space standards. The approved redevelopment will replace these properties with modern homes built to current design, energy efficiency and accessibility standards.

10.1.6 In accordance with the approved planning permission, 90 per cent of dwellings will be delivered to M4(2) Accessible and Adaptable standards, with the remaining 10 per cent delivered to M4(3) Wheelchair User standards. The Scheme includes 14 wheelchair-user homes and will significantly improve housing accessibility within the area.

10.1.7 The Scheme includes a range of communal facilities and amenity spaces designed to support health, wellbeing and social interaction. These include communal gardens, residents' courtyards, a community garden, allotment space, dedicated garden facilities for care leavers and formal and informal play space.

10.1.8 The Council considers that these facilities will contribute positively to the creation of a strong and inclusive community, providing opportunities for recreation, social interaction and community cohesion whilst supporting the health and wellbeing of future residents.

10.1.9 Community safety has been an important consideration throughout the development of the Scheme. The design incorporates Secured by Design principles, including controlled access arrangements, improved natural surveillance, enhanced lighting and private resident amenity areas. These measures respond directly to concerns raised during the consultation process regarding community safety and anti-social behaviour.

10.1.10 Alongside delivery of the Scheme, the Council has implemented a comprehensive tenant rehousing programme through its adopted Local Lettings Plan. The Council's Housing Team has worked closely with affected tenants to secure suitable alternative accommodation and support

households throughout the relocation process. All secure tenants affected by the Scheme, with the exception of Ms Bennett, have now been successfully rehoused.

10.1.11 The Council therefore considers that the Scheme will deliver substantial and lasting social benefits through the provision of affordable housing, specialist accommodation, improved accessibility, high-quality amenity space, enhanced community safety and successful resident rehousing arrangements. The Scheme will make a significant contribution to the social wellbeing of Harold Hill and the wider Borough.

## **10.2 Economic wellbeing**

10.2.1 The Council considers that the Scheme will contribute towards the promotion and improvement of the economic wellbeing of the area.

10.2.2 The Scheme will secure significant investment in Harold Hill through the redevelopment of the Order Land and the construction of 138 affordable homes together with associated landscaping, infrastructure and public realm improvements. The redevelopment will transform an under-utilised site and deliver substantial construction activity over the delivery period.

10.2.3 The Council has concluded that the Scheme would generate direct employment opportunities during the construction phase together with indirect employment opportunities through the local supply chain. The Council considers that these benefits will contribute positively to the local economy and support wider regeneration activity within Harold Hill.

10.2.4 Economic benefits arising from the development are reinforced through obligations secured pursuant to the Section 106 Agreement. These include the preparation and implementation of a Local Resident Training and Recruitment Plan together with an Education Commitments Plan designed to maximise training and employment opportunities associated with the Scheme.

10.2.5 The Section 106 Agreement also requires the use of reasonable endeavours to provide five apprenticeship opportunities during construction, helping to support skills development and training opportunities for local people.

10.2.6 In addition, reasonable endeavours obligations require the developer to seek to utilise local suppliers and local labour throughout the construction process. The Agreement includes targets of at least 20 per cent local suppliers and at least 20 per cent local labour drawn from Havering and neighbouring boroughs. The Council considers that these commitments will assist in ensuring that economic benefits associated with the development are retained within the local area wherever reasonably possible.

10.2.7 The delivery of 138 new homes will also increase the resident population within Harold Hill and is expected to support local expenditure within the surrounding area. The Scheme is located adjacent to the Harold Hill District Centre and additional residents will contribute towards the vitality and viability of local businesses and services.

10.2.8 The Council further considers that the comprehensive redevelopment of a prominent brownfield site will support wider confidence in Harold Hill Town Centre and complement investment already being delivered through the wider regeneration programme. Together with the social and environmental benefits arising from the Scheme, this investment will contribute to the area's long-term sustainability and attractiveness.

10.2.9 The Council therefore considers that the Scheme will make a positive and lasting contribution to the economic wellbeing of Harold Hill and the wider Borough.

### **10.3 Environmental wellbeing**

10.3.1 The Council considers that the Scheme will make a significant contribution towards the promotion and improvement of the environmental wellbeing of the area.

10.3.2 The Order Land currently comprises previously developed land occupied by ageing, under-utilised and partly vacant buildings together with associated hardstanding and external areas. The Scheme will secure the comprehensive redevelopment of the site and replace the existing buildings with modern residential development together with significant environmental and landscape improvements.

10.3.3 The approved redevelopment will deliver a significantly enhanced public realm and landscape environment. The Scheme incorporates communal amenity areas, residents' gardens, a community garden, formal and informal play space, landscaping and biodiversity enhancements designed to improve the quality, appearance and usability of the site for future residents and visitors.

10.3.4 The community garden has been designed to provide a shared and accessible green space for residents, incorporating allotment space, planting opportunities, seating and areas for social interaction. Alongside the wider landscaping proposals, the Council considers that these measures will contribute positively to both the physical environment and the quality of life of future residents.

10.3.5 The Scheme will deliver measurable environmental benefits through the introduction of extensive landscaping, biodiversity enhancements and green infrastructure across the Order Land. The Council's planning assessment concluded that the development will achieve Biodiversity Net Gain and will deliver an Urban Greening Factor of 0.45, exceeding the relevant requirements of the London Plan.

10.3.6 The environmental benefits arising from the Scheme will be secured through planning conditions and planning obligations, including long-term habitat creation, biodiversity monitoring and ecological management measures. The Council considers that these measures will ensure that the environmental improvements associated with the Scheme are maintained for the long term.

10.3.7 Environmental sustainability has been a key consideration in the design of the Scheme. The Council's planning assessment concluded that the approved development is expected to achieve a 77% reduction in regulated carbon emissions when compared with current Building Regulations requirements. This will be achieved through a combination of high-performance building fabric, air source heat pump technology and photovoltaic panels incorporated into the development.

10.3.8 The replacement of ageing and energy inefficient buildings with modern homes built to current environmental standards will contribute positively towards the Council's wider climate change and sustainability objectives whilst reducing energy demand and improving environmental performance across the site.

10.3.9 The Scheme also incorporates sustainable drainage measures and has been designed to support resilience to climate change and future environmental challenges. Community safety and environmental quality have been integrated into the design of the Scheme through Secured by Design principles, natural surveillance, controlled access arrangements, high-quality lighting and carefully designed public spaces.

10.3.10 The Council therefore considers that the Scheme will deliver substantial and lasting environmental benefits through the regeneration of previously developed land, the delivery of Biodiversity Net Gain, an Urban Greening Factor of 0.45, significant reductions in carbon emissions,

enhanced landscaping and public realm, and the creation of a high-quality and sustainable residential environment.

## **11 Related Orders and Special Considerations**

11.1 The Council has considered whether any related orders, consents or special land considerations arise in connection with the Order.

11.2 The Council is not aware of any special category land, open space land, common land, Crown land or other land interests requiring special parliamentary procedure or additional statutory procedures.

11.3 The Council has engaged with statutory undertakers and relevant service providers and is satisfied that any utility diversions or infrastructure works required to facilitate the redevelopment can be addressed through the normal development and construction process. Service enquiries and utilities investigations have been undertaken as part of the Pre-Construction Services Agreement for the Scheme and will continue to be progressed in accordance with standard industry practice as the Scheme moves towards construction.

11.4 The Council has also considered the requirement for a stopping up order under section 247 of the Town and Country Planning Act 1990 in respect of a limited area of highway land affected by the approved development. The requirement relates to a small number of parking spaces to facilitate the approved Scheme. The Council is satisfied that the necessary stopping up order can be secured through the normal statutory process and does not give rise to any significant legal, planning or procedural impediment to delivery of the Scheme.

11.5 Subject to the matters outlined above, the Council is not aware of any legal, planning or procedural impediments that would prevent implementation of the Scheme following confirmation of the Order.

11.6 The Council is not aware of any legal, planning or procedural impediments that would prevent implementation of the Scheme following confirmation of the Order.

## **12 Known Obstacles to Development**

12.1 The Council has considered whether there are any legal, planning, technical, financial or operational matters which could prevent implementation of the Scheme. The Council is satisfied that there are no known obstacles that would prevent the Scheme proceeding following confirmation of the Order and completion of land assembly.

### **12.1 Planning**

12.1.1 Planning permission has been granted for the Scheme and the development benefits from a comprehensive planning framework comprising the planning permission, associated planning conditions and the obligations secured pursuant to the Section 106 Agreement. The Council is satisfied that there are no outstanding planning impediments to implementation of the Scheme.

## **12.2 Utilities and Infrastructure**

12.2.1 The Council has engaged with statutory undertakers and relevant infrastructure providers throughout the planning and design process. Any utility diversions, service connections and associated infrastructure works required to facilitate the development are capable of being addressed through the normal construction process. The Council is not aware of any utility constraints that would prevent implementation of the Scheme.

## **12.3 Highways and Access**

12.3.1 The transport and highway implications of the Scheme have been considered as part of the planning process. Appropriate access, servicing, parking and transport measures have been incorporated within the approved development.

12.3.2 The Council has also considered the requirement for a stopping up order under section 247 of the Town and Country Planning Act 1990 in respect of a limited area of highway land affected by the approved development. The area concerned is located adjacent to Chippenham Road in front of the former 74-84 Chippenham Road properties and has been used for parking purposes. The Council's highway advisers have assessed the proposed stopping up and concluded that it is acceptable in highway terms and necessary to facilitate implementation of the approved Scheme. The Council is satisfied that the stopping up process forms part of the normal statutory implementation process for the development and does not give rise to any substantive impediment to delivery.

12.3.3 The Council has considered the implications of the stopping up requirement and is satisfied that the necessary order can be secured. The approved development has been designed on the basis of the proposed highway alterations and the need for stopping up was fully considered through the planning process. The planning permission also contemplates the delivery of associated highway works through the appropriate highways agreements.

12.3.4 The Council is therefore satisfied that the stopping up process does not represent a substantive obstacle to delivery of the Scheme. Rather, it forms part of the normal statutory and implementation process required to facilitate the approved development.

12.3.5 Accordingly, the Council does not consider that the requirement for a stopping up order gives rise to any significant uncertainty regarding delivery of the Scheme or affects the reasonable prospect of the Scheme proceeding following confirmation of the Order.

## **12.4 Ground Conditions and Site Preparation**

12.4.1 Ground conditions, contamination and other technical matters have been assessed through the planning process and appropriate investigation and mitigation measures are secured through planning conditions where necessary. The Council is satisfied that any site-specific ground condition matters can be adequately addressed through the detailed design and construction process and do not represent an impediment to delivery of the Scheme.

## **12.5 Third Party Rights**

12.5.1 The Council has considered whether any third-party rights, easements or other private rights may affect implementation of the Scheme.

12.5.2 On 12 November 2025, Cabinet resolved that, where necessary, land within the Order boundary may be appropriated for planning and/or housing purposes and authorised the use of powers available under section 203 of the Housing and Planning Act 2016.

12.5.3 Accordingly, should it prove necessary following acquisition and appropriation of any part of the Order Land, the Council is satisfied that the powers available under section 203 of the Housing and Planning Act 2016 would be capable of facilitating implementation of the Scheme notwithstanding the existence of easements or other third-party rights which might otherwise interfere with the approved development. Any interference with such rights would be compensable in accordance with the statutory compensation code.

12.5.4 The Council therefore considers that third-party rights do not present an obstacle to implementation of the Scheme.

## **12.6 Land Assembly**

12.6.1 The principal remaining obstacle to implementation of the Scheme is the acquisition of the outstanding interests within the Order Land.

12.6.2 The Council has made substantial progress in assembling the Order Land through acquisition by agreement. As described elsewhere within this Statement, the majority of interests required to facilitate the redevelopment have already been acquired or otherwise resolved, former occupiers have been rehoused and significant demolition and site clearance works have been completed.

12.6.3 However, a limited number of interests remain outstanding and continue to prevent comprehensive implementation of the approved development. The purpose of the Order is to overcome this remaining obstacle and provide certainty that the Scheme can be delivered within a reasonable timescale.

## **13 Objections**

13.1 We summarise the key themes raised in each objection together with a response from the Council.

### **13.1 Ms Kerry Bennett – Objection summary and Council response.**

#### **13.1.1 Long-term home being compulsorily acquired**

13.1.1.1 Summary of objection: The objector has lived at 70 Chippenham Road for around 30 years and feels the impact of losing their long-term home has not been adequately considered.

13.1.1.2 Council Response: The Council recognises that 70 Chippenham Road has been Ms Bennett's long-term home and that relocation is a significant matter. The Council has sought to manage that impact through the Regeneration Local Lettings Plan, which is designed to support tenants affected by regeneration through direct offers of suitable alternative accommodation and practical engagement. All other secure tenants affected by the Scheme have been successfully rehoused, and Ms Bennett has been made three offers of alternative accommodation, including an additional discretionary offer outside the normal two-offer framework.

#### **13.1.2 Personal circumstances not properly considered**

13.1.2.1 Summary of objection: The objector believes Havering Council and previous landlords failed to properly understand or take account of their individual needs, circumstances, safety and wellbeing during the rehousing process.

13.1.2.2 Council Response: The Council does not accept that Ms Bennett's personal circumstances have been ignored. The Council engaged with her directly, including through correspondence and a meeting at Harold Hill Library on 9 June 2025, and considered her stated wish to leave Havering, her concerns about vulnerability, wellbeing and support from family. The Council also offered ongoing contact and later invited her to discuss the Harrow Crescent offer at a neutral location.

### **13.1.3 Inadequate rehousing support**

13.1.3.1 Summary of objection: Requests for assistance in relocating closer to family in Newmarket were not successfully addressed, despite repeated efforts by the objector.

13.1.3.2 Council Response: The Council has sought to support Ms Bennett through the rehousing process under the Local Lettings Plan and has made three accommodation offers. The Council also signposted her to alternative social housing mobility options, including Seaside & Country Homes, as a potential route to accommodation outside Havering. The Council cannot guarantee a move to a specific out-of-borough location but has sought to provide advice and options within the available rehousing framework.

### **13.1.4 Safety concerns ignored**

13.1.4.1 Summary of objection: The council offered accommodation in an area associated with a former abuser who had committed serious violence against the objector and has since been released from prison. The objector feels these risks were not properly taken into account.

13.1.4.2 Council Response: The Council recognises the seriousness of the safety concerns raised. The evidence indicates that, before the April 2026 possession hearing, Ms Bennett had referred to vulnerability, wellbeing and not feeling able to remain in Havering, but had not specifically framed the suitability issue as one relating to domestic abuse or the location of a former partner. Once that issue was raised, the Council continued to consider the appropriateness of the offer and whether any further issues relating to safety, wellbeing or relocation support could reasonably be addressed within the Local Lettings Plan.

### **13.1.5 Lack of meaningful consultation**

13.1.5.1 Summary of objection: The objector feels their concerns were not listened to or understood and that they were given insufficient time to respond to a housing offer.

13.1.5.2 Council Response: The Council does not accept that Ms Bennett was denied meaningful engagement. The Council wrote to her, attempted a home visit, met her at Harold Hill Library, followed up in writing, considered her modular home proposal, made three accommodation offers and invited further discussion before the deadline for the Harrow Crescent offer. The Council's position is that engagement remained open alongside the possession and CPO processes.

### **13.1.6 Failure to consider mental wellbeing**

13.1.6.1 Summary of objection: The objector argues that the emotional impact of the rehousing process, safety fears, bereavement and potential loss of their home have not been properly assessed or supported.

13.1.6.2 Council Response: The Council recognises that the rehousing and possession process may have caused distress. Ms Bennett's wellbeing concerns were considered through the rehousing process and in the Equality Act Review. The Council also made a referral to the Havering Mental Health Access and Assessment Team.

### **13.1.7 Rejection of alternative housing solution**

13.1.7.1 Summary of objection: A proposal for financial compensation to enable the purchase of a mobile home on the objector's daughter's property was rejected without explanation.

13.1.7.2 Council Response: The Council considered Ms Bennett's proposal for the purchase or provision of a modular or mobile home. The proposal was discussed internally and escalated to senior management, but was not agreed because it fell outside the Local Lettings Plan framework and raised concerns about consistency and precedent. The Council's approach under the Local Lettings Plan is to secure suitable alternative accommodation rather than fund bespoke private arrangements outside that framework.

### **13.1.8 Stress caused by overlapping legal processes**

13.1.8.1 Summary of objection: The compulsory purchase process has coincided with court proceedings relating to the home, creating significant stress and confusion.

13.1.8.2 Council Response: The Council recognises that the overlap between possession proceedings and the CPO process may have been difficult for Ms Bennett. The processes are separate but related: the possession proceedings concern vacant possession of 70 Chippenham Road, while the CPO process concerns assembly of interests required to deliver the Scheme. The Council has continued to consider rehousing options and maintain engagement alongside those proceedings. The Council also agreed to meet capped professional advice costs to assist Ms Bennett with the land referencing questionnaire, although the wider rehousing process remained led by the Council's Housing team.

### **13.1.9 Lack of mental health support**

13.1.9.1 Summary of objection: The objector requested mental health support from the council but states that no support was provided and they were informed they were not entitled to assistance.

13.1.9.2 Council Response: The Council does not accept that mental health concerns were ignored. A referral was made by the Council on 10 February 2026 to the Havering Mental Health Access and Assessment Team following Ms Bennett's claim of concerns.

### **13.1.10 Poor communication and accessibility**

13.1.10.1 Summary of objection: The compulsory purchase notice was difficult to understand, and the objector felt overwhelmed due to lacking professional advice or support.

13.1.10.2 Council Response: The Council accepts that the CPO and rehousing processes can be difficult to navigate. The Council and its advisers have sought to explain the process, maintain written contact and offer meetings, including at neutral locations. The Council also agreed to meet capped professional advice costs to assist Ms Bennett with the land referencing questionnaire, although the wider rehousing process remained led by the Council's Housing team.

### **13.1.11 Unfair treatment and lack of duty of care**

13.1.11.1 Summary of objection: Overall, the objector considers that they have not been treated fairly, compassionately, or with an appropriate duty of care throughout the process.

13.1.11.2 Council Response: The Council does not accept that Ms Bennett has been treated unfairly. The Council has sought to balance her personal circumstances with the need to secure vacant possession for the approved regeneration scheme. She has been offered three properties, including a discretionary third offer, has had her modular home proposal considered, has been signposted to mobility options and has been the subject of an Equality Act Review. The Council remains of the view that it has acted reasonably and proportionately.

## **13.2 Tolu Olubanjo – Objection summary and Council response.**

### **13.2.1 Procedural failures in consultation and notification**

13.2.1.1 Summary of objection: The objector argues that Havering Council failed to provide required planning and CPO notices relating to the redevelopment scheme and therefore denied them the opportunity to participate in consultations or object to proposals affecting their property.

13.2.1.2 Council Response: The Council does not accept that Ms Olubanjo was denied a fair opportunity to participate in the planning or CPO processes. The Council's evidence addresses the relevant planning publicity and notices, and the witness evidence confirms a long history of engagement with Ms Olubanjo concerning the property, including communications, buyback offers and meeting invitations over several years.

### **13.2.2 Incorrect service of notices**

13.2.2.1 Summary of objection: The objector states that notices were sent to an outdated correspondence address and that service by email was unlawful because they had not expressly consented to receiving legal notices electronically. The objector contends that statutory procedures for making the CPO have not been properly complied with and therefore the Order should fail on procedural grounds alone.

13.2.2.2 Council Response: The Council does not accept that the Order should fail on procedural grounds. The Council and its advisers took steps to identify relevant addresses and communicate with Ms Olubanjo by email and post. The Council's evidence also records repeated issues arising from changes of correspondence address, claims of non-receipt and periods of non-engagement. The Council will rely on its land referencing and service evidence to demonstrate compliance with statutory requirements.

### **13.2.3 Scheme not financially viable**

13.2.3.1 Summary of objection: The objector argues that Havering Council has not demonstrated that the regeneration scheme is financially deliverable, citing reliance on borrowing, financial pressures within the Housing Revenue Account (HRA), and uncertainty over future funding.

13.2.3.2 Council Response: The Council does not accept that the Scheme is financially undeliverable. Detailed financial and affordability assessments have been undertaken as part of the development, appraisal and approval of the Scheme. The Council's funding evidence demonstrates that anticipated costs, funding sources and borrowing requirements have

been identified, assessed and approved through the Council's governance processes. Planning permission has been granted, a Section 106 Agreement has been completed and an identified delivery strategy is in place. The relevant question for the purpose of confirmation of the Order is whether there is a reasonable prospect that the Scheme will proceed. The Council's evidence demonstrates that this test is satisfied.

#### **13.2.4 Excessive borrowing and financial risk**

13.2.4.1 Summary of objection: Concerns are raised that the Council's regeneration programme could lead to unsustainable levels of debt and expose taxpayers to significant financial risk.

13.2.4.2 Council Response: The Council does not accept that concerns regarding borrowing undermine the justification for the Order. The Council's funding evidence explains how the Scheme has been assessed through the Housing Revenue Account business planning process, including consideration of borrowing requirements, affordability, available funding sources and long-term financial sustainability. The Council has concluded that the Scheme can be delivered within its approved financial framework. General concerns regarding local authority borrowing do not demonstrate that the Chippenham Road Scheme lacks a reasonable prospect of delivery or that confirmation of the Order should be denied.

#### **13.2.5 Funding uncertainty for later phases**

13.2.5.1 Summary of objection: The objector notes that only Phase 1 has detailed plans while later phases, including the phase affecting their property, remain less developed and are not fully costed.

13.2.5.2 Council Response: The Council does not accept that delivery of the Chippenham Road Scheme is dependent upon uncertain future funding for later regeneration phases. The Order relates to a specific approved development which benefits from its own planning permission, funding arrangements and delivery strategy. The Council's evidence demonstrates that the Scheme has been assessed on its own merits and is not reliant upon implementation of future phases in order to proceed. Acquisition of 10 Rothbury House is required to enable delivery of the approved Scheme for which the Order has been made.

#### **13.2.6 Economic conditions threaten deliverability**

13.2.6.1 Summary of objection: The objector argues that inflation, borrowing costs, construction cost increases and wider economic uncertainty undermine the viability of the redevelopment proposals.

13.2.6.2 Council Response: The Council recognises that inflation, borrowing costs and wider construction market conditions are relevant considerations for any major development project. However, these matters have been taken into account within the Council's financial and delivery assessments. The Council's funding evidence demonstrates that affordability and sensitivity testing have informed the development of the Scheme and its delivery strategy. The existence of normal market and construction risks does not undermine the conclusion that there is a reasonable prospect of the Scheme proceeding or the justification for confirmation of the Order.

#### **13.2.7 Scheme not in the public interest**

13.2.7.1 Summary of objection: The objection asserts that the financial burden of the scheme outweighs its benefits and could negatively affect other public services while providing limited additional public value.

13.2.7.2 Council Response: The Council does not accept that the Scheme is contrary to the public interest. The approved Scheme will deliver 138 affordable homes, including supported housing accommodation, and will replace obsolete and under-used buildings with a modern, policy-compliant development. The Scheme will also contribute to the wider regeneration of Harold Hill through environmental, social and placemaking benefits. The public benefits of the Scheme were assessed through the planning process and are relied upon in support of the Order. The Council's evidence further demonstrates that the Scheme is capable of being funded and delivered, ensuring that these public benefits are capable of being realised in practice.

### **13.2.8 Key land interests not acquired**

13.2.8.1 Summary of objection: The objector argues that the Council has not secured all necessary property interests, including their leasehold flat and other affected properties, indicating that key consents remain outstanding.

13.2.8.2 Council Response: The Council agrees that a limited number of interests remain outstanding. That is precisely why the Order is required. The Council has made substantial progress in assembling the land, including by agreement, but 10 Rothbury House remains outstanding and is required to enable comprehensive implementation of the approved Scheme. The Council's funding and delivery strategy assumes acquisition of the remaining interests required for redevelopment and the Order has been promoted to secure those remaining interests where acquisition by agreement has not been possible.

### **13.2.9 Alleged unlawful conduct by the Council**

13.2.9.1 Summary of objection: The objector alleges a pattern of unlawful behaviour by the Council, including breaches of lease obligations, interference with property rights and actions taken without proper authority.

13.2.9.2 Council Response: The Council does not accept that the alleged conduct undermines the justification for the Order. The Council's evidence explains the history of the property, including vacancy, vandalism, anti-social behaviour, the Closure Order and subsequent access issues. The Council accepts that there was a delay in formally notifying Ms Olubanjo of access arrangements after expiry of the Closure Order, and that aspect of the complaint was upheld, but the Council does not accept that it unlawfully took possession of the property.

### **13.2.10 Property blight and failure to maintain**

13.2.10.1 Summary of objection: The Council is accused of intentionally failing to maintain and secure the building, which the objector says reduced the property's value and prevented its sale or beneficial use.

13.2.10.2 Council Response: The Council does not accept that it intentionally allowed the property to deteriorate. Evidence indicates that the property was last occupied by a tenant around 2022 and was subsequently broken into and vandalised, with copper pipework, wiring and the boiler removed. A security door was installed to prevent further damage and anti-social behaviour. The Council's position is that the building has been maintained in accordance with the lease and associated charges have been raised under the lease.

### **13.2.11 Unlawful access and possession of property**

13.2.11.1 Summary of objection: The objector claims the Council removed and replaced the property's entrance door, gained access without consent and effectively took possession of the flat without a court order.

13.2.11.2 Council Response: The Council denies that it unlawfully repossessed the property or took possession of the flat. The witness evidence states that any access restrictions arose from the lawful Closure Order and safety considerations affecting Rothbury House. The Council's position is that the Closure Order was a response to serious anti-social behaviour, unauthorised occupation, vandalism and safety issues affecting the building.

#### **13.2.12 Improper use of Closure Orders**

13.2.12.1 Summary of objection: The objector alleges that Closure Orders affecting the property were obtained without proper notice, based on inaccurate information, and were subsequently used to exclude them from their property.

13.2.12.2 Council Response: The Council does not accept that the Closure Order was improperly used. Evidence identifies that Rothbury House had become subject to serious anti-social behaviour, including drug activity, vandalism and unauthorised occupation. A Closure Order was granted by the Court on 8 March 2024 and extended on 6 June 2024, and the Court determined that the building was unsafe and unsuitable for occupation.

#### **13.2.13 Failure to return possession after Closure Order ended**

13.2.13.1 Summary of objection: The objector claims that the Council failed to return possession of the property after the Closure Order expired, despite a court order requiring this.

13.2.13.2 Council Response: The Council accepts that there was a delay in formally notifying Ms Olubanjo of access arrangements following expiry of the Closure Order. Evidence explains that this arose from internal miscommunication and a staff departure, and that the Council upheld this aspect of Ms Olubanjo's complaint. However, the Council's evidence is that access to the property remained available by arrangement during that period.

#### **13.2.14 Adverse impact on health and wellbeing**

13.2.14.1 Summary of objection: The objector states that the Council's actions have caused significant mental health impacts and hardship for them and their family, including detrimental effects on a child with special educational needs.

13.2.14.2 Council Response: The Council recognises that the dispute has been difficult for Ms Olubanjo, but does not accept that this undermines the justification for acquisition of the property. The property is a buy to let investment for Ms Olubanjo rather than her home and forms part of the approved redevelopment site. It is required for the Scheme. Alleged distress, stress or inconvenience does not alter the need for acquisition, although compensation issues can be addressed through the appropriate legal routes where substantiated.

#### **13.2.15 Redevelopment plans lack robustness**

13.2.15.1 Summary of objection: The objector argues that the redevelopment proposals are not sufficiently developed and rely on broad outline plans rather than a fully evidenced and deliverable scheme.

13.2.15.2 Council Response: The Council does not accept that the redevelopment proposals lack robustness. Planning permission has been granted, the Section 106 Agreement has been completed and the Scheme forms part of the Council's wider Harold Hill regeneration programme. Detailed financial appraisals, funding assessments and delivery planning have also been undertaken. The Council has demonstrated that the Scheme has progressed well beyond a conceptual proposal and is

capable of implementation once the remaining land interests required for delivery have been acquired.

#### **13.2.16 Land acquisition not justified**

13.2.16.1 Summary of objection: The objector contends that the Council has not demonstrated a compelling reason for acquiring their specific property and that its inclusion within the scheme is unnecessary.

13.2.16.2 Council Response: The Council does not accept that acquisition of 10 Rothbury House is unjustified. Rothbury House forms part of the Order Land and sits within the approved redevelopment site. The Council has sought to acquire the property since 2019 and has made multiple offers of compensation and reasonable professional costs. The Council's funding and delivery strategy assumes acquisition of the remaining interests within the Order Land. Without acquisition of 10 Rothbury House, the Council would be unable to secure comprehensive redevelopment of the site in accordance with the approved Scheme.

#### **13.2.17 Property not required for Chippenham Road scheme**

13.2.17.1 Summary of objection: The objector argues that their property on Kings Lynn Drive is geographically separate from Chippenham Road and falls outside the stated purpose of the acquisition.

13.2.17.2 Council Response: The Council does not accept that 10 Rothbury House is separate from the Scheme. The property forms part of Rothbury House, which is within the approved redevelopment site and required for comprehensive delivery of the Chippenham Road Scheme. Without acquisition of the remaining leasehold interest, the Council cannot secure full control of the building or implement the approved redevelopment as intended.

#### **13.2.18 Excessive land take**

13.2.18.1 Summary of objection: The objection alleges that additional properties have been included within the redevelopment area unnecessarily because the Council was unable to secure certain sites elsewhere within the scheme area.

13.2.18.2 Council Response: The Council does not accept that the Order includes unnecessary land. The Order Land reflects the land required to deliver the approved Scheme, and Rothbury House is required to enable the comprehensive redevelopment of the western part of the site. The extent of the Order is justified by the approved planning permission and the practical requirements of delivery.

#### **13.2.19 Alternative sites not properly considered**

13.2.19.1 Summary of objection: The objector believes other potential redevelopment sites exist and that the Council has not adequately explored less intrusive alternatives before pursuing compulsory acquisition.

13.2.19.2 Council Response: The Council has considered alternatives, including retention, refurbishment and adaptation of the existing buildings. Those options were not capable of delivering the same scale of affordable housing, supported housing accommodation, accessibility improvements or environmental benefits. The Council also considered deliverability and funding considerations in assessing alternative options. The approved Scheme was selected because it provides the most effective and deliverable means of achieving the identified public benefits within

a reasonable timeframe. The objector has not identified an alternative site capable of delivering the same public benefits within a reasonable timescale.

### **13.2.20 Development driven by Council interests**

13.2.20.1 Summary of objection: The objector argues that the scheme was selected primarily to advance Council regeneration objectives rather than because it represents the best option in the wider public interest.

13.2.20.2 Council Response: The Council does not accept that its regeneration objectives are separate from the public interest. The Scheme has been subject to planning scrutiny, financial appraisal and formal democratic decision-making processes. Its purpose is to deliver affordable housing, supported housing accommodation and wider social, economic and environmental benefits for the local community. These are clear public objectives and form the basis of the Council's compelling case in the public interest. The Council's evidence further demonstrates that the Scheme is supported by an identified funding and delivery strategy capable of bringing those benefits forward.

### **13.2.21 Loss of hope value**

13.2.21.1 Summary of objection: The objector states that compulsory acquisition would remove future development and investment potential associated with their property, resulting in loss of hope value.

13.2.21.2 Council Response: This is a compensation matter rather than an objection to the principle of the Order. Any claim for loss of development potential or hope value falls to be assessed under the statutory compensation code and, if not agreed, may be determined by the Upper Tribunal. It does not undermine the need to acquire 10 Rothbury House for the approved Scheme.

## **13.3 Stonegate / Unique Pub Properties Theta Ltd – Objection summary and Council response**

### **13.3.1 Loss of a valuable community pub**

13.3.1.1 Summary of objection: The Alderman is described as a popular, financially viable and operational pub that provides social, community and economic benefits. The objector argues its closure would remove an important local asset and community meeting place.

13.3.1.2 Council Response: The Council recognises that the Alderman Public House has local value and that its loss was a matter considered through the planning process. The planning authority concluded that the public benefits of the approved Scheme outweighed the loss of the existing facility, particularly given the wider Harold Hill regeneration proposals and the secured public house re-provision strategy. The Council has also engaged with Stonegate regarding replacement licensed premises within the wider town centre proposals, including a written offer of first refusal of the replacement unit.

### **13.3.2 Council's regeneration delivery record**

13.3.2.1 Summary of objection: The objector questions the Council's ability to deliver the scheme, citing delays and difficulties associated with the Waterloo Estate regeneration project as evidence that past regeneration commitments have not been achieved as planned.

13.3.2.2 Council Response: The Council does not accept that issues arising on unrelated regeneration projects undermine the deliverability of the Chippenham Road Scheme. The Scheme has its own planning permission, approved funding arrangements, delivery strategy and governance approvals. The Council's funding and delivery evidence demonstrates that the costs, funding sources and borrowing requirements associated with the Scheme have been identified and assessed. The Scheme also forms part of the wider Harold Hill Town Centre regeneration programme and sits alongside other approved regeneration projects that are progressing through delivery. The deliverability of the Chippenham Road Scheme must be assessed on its own merits and the Council's evidence demonstrates that there is a reasonable prospect of implementation.

### **13.3.3 Scheme does not constitute comprehensive redevelopment**

13.3.3.1 Summary of objection: The objector argues that the development is limited in scope because key buildings within the site will remain. They contend that the scheme is piecemeal rather than comprehensive and is unlikely to deliver the transformational change claimed by the Council.

13.3.3.2 Council Response: The Council does not accept that the Scheme is piecemeal. Planning permission P1150.24 secures the comprehensive redevelopment of the Order Land as Phase 2 of the wider Harold Hill masterplan. The church, vicarage and funeral services premises do not form part of the planning permission site and their exclusion reflects planning policy protection for social infrastructure, rather than any lack of comprehensiveness in the approved Scheme.

### **13.3.4 Loss of existing viable buildings and assets**

13.3.4.1 Summary of objection: The redevelopment would require the demolition of buildings that are still functional and valuable, including The Alderman pub, while other similar nearby buildings are being retained.

13.3.4.2 Council Response: The Council considered alternatives during preparation of the Scheme, including retention and refurbishment options. Those options were not considered capable of delivering the modern space, accessibility, energy-efficiency standards or wider regeneration benefits required. The loss of the Alderman was considered through the planning process and weighed against the substantial public benefits of the approved Scheme, with public house re-provision secured through the wider regeneration proposals.

### **13.3.5 Alternative design solutions available**

13.3.5.1 Summary of objection: The objector believes the proposed housing could be delivered through amendments to the scheme layout, including enlarging proposed residential blocks and relocating community space, thereby avoiding the loss of The Alderman.

13.3.5.2 Council Response: The Council does not consider that the alternative layouts suggested by the objector would deliver the same benefits or be feasible in planning and design terms. Alternative options were considered through the design process, including as shown in the Design and Access Statement. The Council's position is that the approved Scheme represents the most appropriate response to site constraints, including existing trees, level changes, the need for a community garden and the delivery of affordable housing.

### **13.3.6 Alternative development sites available**

13.3.6.1 Summary of objection: The objector suggests that affordable housing could instead be provided on the former Pompadours pub site, which is vacant and in poor condition, avoiding the need to acquire and demolish a successful community facility.

13.3.6.2 Council Response: The Council does not accept that the former Pompadours site provides a realistic alternative to the approved Scheme. That site is privately owned and already benefits from planning permission for a smaller residential scheme. It is not within the Council's control and would not deliver the same scale of affordable housing, supported accommodation or wider regeneration benefits as the approved Chippenham Road Scheme.

### **13.3.7 Conflict with planning and government policy**

13.3.7.1 Summary of objection: The objection states that demolishing a valued community pub conflicts with national government support for the pub sector and London Plan policies that seek to protect pubs with community, cultural and social value.

13.3.7.2 Council Response: The Council recognises the policy protection afforded to public houses with social, cultural or community value. That matter was considered through the planning process. The Council's position is that the loss of the existing Alderman is justified by the substantial public benefits of the Scheme and by the secured re-provision of public house facilities within the wider Harold Hill regeneration proposals.

### **13.3.8 Financial viability concerns**

13.3.8.1 Summary of objection: The objector challenges the Council's assertions regarding the scheme's viability and requests evidence that land acquisition costs, compensation liabilities and construction cost inflation have been properly accounted for.

13.3.8.2 Council Response: The Council does not accept that the Scheme is insufficiently evidenced or financially uncertain. Detailed financial and affordability assessments have been undertaken as part of the development and approval of the Scheme. The Council's funding evidence demonstrates that anticipated development costs, land acquisition costs, funding sources and borrowing requirements have been identified and assessed through the Council's governance processes. The Council has also considered delivery risks, including construction cost inflation and wider market conditions. The relevant question for the purposes of confirmation of the Order is whether there is a reasonable prospect that the Scheme will proceed, and the Council's evidence demonstrates that this test is satisfied.

### **13.3.9 Risk of development delays or non-delivery**

13.3.9.1 Summary of objection: Concerns are raised that, as with other regeneration projects, the scheme may not proceed as intended, resulting in land acquisition and demolition without timely redevelopment.

13.3.9.2 Council Response: The Council is satisfied that the Scheme is deliverable. Planning permission has been granted, the Section 106 Agreement has been completed, delivery arrangements are in place and substantial progress has been made in assembling the land required for redevelopment. The Council's funding evidence demonstrates that the Scheme benefits from an

identified funding and delivery strategy and that there is a reasonable prospect of implementation. The principal remaining impediment to commencement is the acquisition of the outstanding interests required to secure complete site assembly, which is precisely the purpose of the Order.

#### **13.3.10 Poor conduct by the Council**

13.3.10.1 Summary of objection: The objector alleges the Council entered land without consent to install monitoring boreholes, failed to provide notification regarding demolition proposals, and improperly referred to confidential negotiation discussions.

13.3.10.2 Council Response: The Council does not accept that its conduct undermines the justification for the Order. The Council owns the freehold and has sought to engage with the occupier and relevant interests regarding access and investigations. The detailed factual response to the borehole and notification points should be addressed in the relevant witness evidence, but the Council's position is that these matters do not affect the planning justification or necessity for acquisition.

#### **13.3.11 Ineffective negotiations**

13.3.11.1 Summary of objection: The objector argues that negotiations have been unsatisfactory because the Council has failed to properly understand the owner's business model, compensation entitlement and valuation methodology.

13.3.11.2 Council Response: The Council does not accept that negotiations have been ineffective. The Council and Ardent have engaged with Stonegate and its advisers over an extended period, made offers, considered valuation issues and explored mechanisms to resolve disagreement. The Council has also proposed independent expert determination as a practical route to resolving valuation matters where agreement has not been possible.

#### **13.3.12 Inadequate transparency in valuation discussions**

13.3.12.1 Summary of objection: The Council is criticised for making offers over a number of years without providing sufficient supporting evidence, valuation breakdowns or justification to allow meaningful engagement.

13.3.12.2 Council Response: The Council does not accept that it has failed to engage transparently. The Council has sought to negotiate by private treaty and has made offers over a number of years. It has also agreed to meet reasonable professional advice costs, understood Stonegate to have instructed Avison Young, and proposed independent expert determination to address valuation disagreements objectively.

#### **13.3.13 Failure to apply compensation principles correctly**

13.3.13.1 Summary of objection: The objector contends that the Council has not followed recognised compulsory purchase compensation principles, including the "value to owner" approach, resulting in offers that undervalue the property interest.

13.3.13.2 Council Response: The Council does not accept that it has failed to apply compensation principles. Compensation is a matter governed by the statutory compensation code and, if

agreement cannot be reached, may ultimately be determined by the Upper Tribunal. The existence of a compensation dispute does not undermine the case for confirmation of the Order.

#### **13.3.14 Compulsory purchase is not a last resort**

13.3.14.1 Summary of objection: The objection argues that negotiations remain ongoing and that alternative dispute resolution remains possible. Therefore, compulsory purchase powers have been invoked prematurely and do not satisfy the requirement that they be used only as a last resort.

13.3.14.2 Council Response: The Council does not accept that compulsory purchase has been pursued prematurely. Negotiations have been ongoing for a significant period and will continue in parallel with the CPO process where possible. The Council has offered direct engagement and alternative means of resolving valuation disagreement, including independent expert determination, but the Order is required to provide certainty that the Scheme can be delivered.

#### **13.3.15 Objection to binding dispute resolution**

13.3.15.1 Summary of objection: While willing to consider alternative dispute resolution, the objector objects to any process that would remove its right to challenge compensation through the Upper Tribunal.

13.3.15.2 Council Response: The Council notes the objector's position regarding binding dispute resolution. The Council's proposal for independent expert determination was intended to provide a practical mechanism for resolving valuation disagreement and achieving agreement without reliance on compulsory powers. Independent expert determination would enable the parties to exchange evidence and present their respective valuation cases in a manner broadly analogous to proceedings before the Upper Tribunal, whilst avoiding much of the time, cost and procedural burden associated with formal litigation. The Council notes that alternative dispute resolution is widely encouraged in compensation disputes and often provides a proportionate means of resolving valuation issues. The proposal was therefore advanced as a practical and cost-effective means of narrowing or resolving the matters in dispute. In any event, statutory compensation protections remain available and any unresolved compensation dispute can ultimately be addressed through the appropriate statutory process, including determination by the Upper Tribunal where necessary.

#### **13.3.16 Overall request to reject the Order**

13.3.16.1 Summary of objection: The objector asks that the Compulsory Purchase Order not be confirmed because there are less intrusive alternatives capable of delivering the proposed benefits without removing a valued and viable community asset.

13.3.16.2 Council Response: The Council does not accept that the Order should be rejected. The approved Scheme will deliver substantial public benefits, including 138 affordable homes, supported housing accommodation, public realm and environmental improvements, and secured public house re-provision. The Council considers that no less intrusive alternative has been identified which would deliver the same benefits within a reasonable timescale. The Council's planning, funding and delivery evidence demonstrates that the approved Scheme is both justified and capable of implementation.

## **14 Conclusion**

14.1 The Council considers that there is a compelling case in the public interest for confirmation of the Order.

14.2 The Order has been made to facilitate the comprehensive redevelopment of the Order Land and the delivery of a planning permission that will provide substantial public benefits. The Scheme will deliver 138 affordable homes, comprising 116 Affordable Housing Units and 22 Supported Housing Accommodation Units, together with new public realm, landscaping, biodiversity enhancements, play space and other environmental improvements. The Council considers that the Scheme will contribute significantly to the promotion and improvement of the economic, social and environmental wellbeing of Harold Hill and the wider Borough.

14.3 The Scheme benefits from planning permission and accords with the National Planning Policy Framework, the London Plan and the Havering Local Plan. The planning merits of the Scheme have therefore been independently assessed through the development management process and the Council is satisfied that the approved redevelopment represents an appropriate and sustainable form of development for the Order Land.

14.4 The Council has sought throughout to acquire the interests required to facilitate the Scheme by agreement. Significant progress has been made in assembling the Order Land, rehousing residents and securing vacant possession. However, a small number of remaining interests continue to prevent comprehensive implementation of the approved redevelopment. The Council therefore considers that the Order remains necessary to provide certainty that the Scheme can proceed within a reasonable timescale.

14.5 The Council also considers that there is a reasonable prospect of the Scheme proceeding following confirmation of the Order. Planning permission has been secured, substantial site clearance has already taken place and the Council has established delivery arrangements for implementation of the redevelopment. The Council will provide detailed evidence regarding funding, viability, deliverability and programme through separate witness evidence and inquiry material. That evidence will demonstrate that the resources necessary to implement the Scheme are likely to be available and that there is a clear and realistic prospect of delivery within a reasonable timescale.

14.6 Having regard to the planning merits of the Scheme, the substantial public benefits which it will deliver, the steps taken to acquire interests by agreement, the absence of any substantive impediments to implementation and the availability of compulsory purchase powers under section 226(1)(a) of the Town and Country Planning Act 1990, the Council is satisfied that the interference with private rights is justified, proportionate and necessary in the public interest.

14.7 Accordingly, the Council respectfully requests that the Secretary of State confirms the London Borough of Havering (Harold Hill Town Centre – Chippenham Road) Compulsory Purchase Order 2026.

## **15 Additional Information**

15.1 The documents listed at the end of this Statement, form part of the Core Documents which the Council may also refer to at the public inquiry. It will be made available at a deposit location to be identified separate to this Statement. The Council reserves the right to add or remove documents from this list in the light of any objections and representations made in respect of the Order.

15.2 The documents can also be viewed online at:

<https://consultation.havering.gov.uk/regeneration/harold-hill-town-centre-chippenham-rd-cpo/>

15.3 Persons requiring further information regarding the Order should contact Michael Rourke at the Council by email to [Michael.Rourke2@havering.gov.uk](mailto:Michael.Rourke2@havering.gov.uk)

15.4 Owners and occupiers of the Order Land who wish to negotiate a sale or discuss matters of compensation should contact John Sayer at [johnsayer@ardent-management.com](mailto:johnsayer@ardent-management.com) or by telephone on 07500 866113.

## **16 Documents for the Inquiry**

16.1 The Council may refer to the following core documents at the Inquiry:

### **16.1 Core Documents**

- The London Borough of Havering (Harold Hill Town Centre – Chippenham Road) Compulsory Purchase Order 2026.
- Order Map.
- Statement of Reasons.
- Cabinet Report and Resolution dated 12 November 2025 authorising the making of the Order and, where necessary, the appropriation of land for planning and/or housing purposes and use of powers under section 203 of the Housing and Planning Act 2016
- Notice of Inquiry issued by the Planning Inspectorate dated 25 June 2026.

### **16.2 Other Documents**

- Cabinet Report dated 17 March 2021 approving the coordinated masterplan approach for Farnham & Hilldene District Centre, Chippenham Road and Abercrombie Hostel
- Decision Notice for Planning Permission ref. P1150.24 dated 8 December 2025.
- Strategic Planning Committee Report dated 27 February 2025 relating to Planning Permission ref. P1150.24.
- Section 106 Agreement relating to Planning Permission ref. P1150.24
- National Planning Policy Framework.
- The London Plan (2021).
- Havering Local Plan (2021).
- London Borough of Havering Regeneration Local Lettings Plan.
- Guidance on Compulsory Purchase Process and the Crichel Down Rules (June 2026).

### **16.3 Additional Documents**

16.3.1 The Council may also refer to further documents in its proofs of evidence, witness evidence, rebuttal evidence and other inquiry documents. Such documents may include material relating to planning, funding, viability, deliverability, consultation, land assembly, negotiations, rehousing and other matters relevant to the Order.

16.3.2 The Council reserves the right to add to, remove from, amend or supplement this document list in light of any further representations, objections, directions from the Inspector or other matters arising before or during the Inquiry.

