

Deptford Southern Housing CPO 2021 – Statement of Reasons

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1. Introduction

- 1.1. This is the Statement of Reasons of the Council of the London Borough of Lewisham (“the Council”) for the making a compulsory purchase order (“CPO”) entitled the “London Borough of Lewisham (DEPTFORD SOUTHERN HOUSING – 2-30A REGINALD ROAD) COMPULSORY PURCHASE ORDER 2021” (“the Order”), which is to be submitted to the Secretary of State for Levelling Up, Housing and Communities (“the Secretary of State”) for confirmation. It has been prepared in accordance with the “Guidance on Compulsory Purchase and the Crichel Down Rules” published by the Ministry for Levelling Up, Housing and Communities (“the Guidance”).
- 1.2. The Council is the acquiring authority and has made the Order pursuant to section 17 of Part II of the Housing Act 1985 (“the 1985 Act”), and related powers and provisions under the Acquisition of Land Act 1981. The Council is the local housing authority within the meaning of the 1985 Act. It is also the local planning authority.
- 1.3. In this Statement of Reasons, the land included within the Order is referred to as the “Order Land” which is shown on the plan at **Appendix A** to this Statement (“the Order Map”). The Order Land includes a low density brick built, cladded block from the 1960s, of 16 residential properties (15 x 2 bed maisonettes and 1 x 4 bed maisonette), hard standing, an electrical sub-station and communal garden.
- 1.4. The Council owns the freehold of the Order Land, and the majority of the other property interests in the Order Land. The Schedule of Interests (at **Appendix B**) lists, where known, the owners, lessees, occupiers and tenants of the Order Land in addition to other parties with a qualifying interest (per section 12(2)(a) and 12(2A) of the Acquisition of Land Act 1981 (as amended) ('ALA 1981'). There is only one interest in the Order Land which the Council considers it would be necessary to compulsorily acquire, that being a leasehold interest in one of the maisonettes at 2 – 30A Reginald Road. The Council has agreed the purchase of all other leasehold interests and anticipates that it will be able to secure possession from other occupiers and tenants without recourse to compulsory acquisition.
- 1.5. The Order Land benefits from the grant of planning permission, as part of the redevelopment of a wider area of land north of Reginald Road and south of Frankham Street SE8, also known as the Tidemill site (permission reference DC/16/095039) (“the Planning Permission”). The full Tidemill site extends to 1.26 hectares. The Planning Permission is at **Appendix C**. It granted permission for the demolition of the former caretaker's house on Frankham Street, the demolition of 2-30A Reginald Road, the partial demolition, conversion and extension of the former Tidemill School buildings, and the construction of three new buildings ranging from 2 to 6 storeys, to provide 209 residential units, together with amenity space, landscaping, car and cycle parking. Of the 209 residential units consented by the Planning Permission, 65 are proposed for the Order Land.
- 1.6. The Council has given careful consideration to all relevant issues and, having done so, is satisfied that there is a compelling case in the public interest to make the Order (per paragraph 12 of the Guidance). In particular, the Council is satisfied that compulsory acquisition of the Order Land is required for the provision of housing accommodation and will achieve both a quantitative and qualitative housing gain:
 - 1.6.1. It will facilitate a quantitative increase of housing, enabling the provision of 65 new homes (an increase of 49 homes in total), of which 38 will be social rented homes (an increase of 25 social rented homes in total), and 27 will be shared ownership, as against the current position of no shared ownership homes;

- 1.6.2. It will facilitate a qualitative improvement, by reason of the Order Land completing the regeneration of the Tidemill site within which the Order Land sits (redevelopment of the Order Land is the proposed third phase of the redevelopment of the Tidemill site), thereby materially improving the amenity of the area and contributing to the wider regeneration of the Deptford area;
- 1.6.3. Further significant qualitative improvements will arise through the Order enabling the provision of modern homes which (a) meet the latest design standards including environmental and energy efficiency standards, (b) provide improved accessibility, with modern communal entrances with stairs and lifts, enabling a larger range of potential occupants, and (c) provide improved design with the replacement of the present low quality building with a building of high quality design featuring elegant metal balconies and high quality bricks, which will integrate with the wider redevelopment of the Tidemill site.
- 1.7. In particular, the Order will enable the redevelopment of the Order Land in accordance with the Planning Permission, and secure both the regeneration aims for the Order Land but also wider regeneration aims for the Giffin Street regeneration area, which has been a long-term aim of the Council.
- 1.8. The Giffin Street regeneration area is Council owned land in the centre of Deptford, located south of the main railway line adjacent to Deptford High Street and Deptford Church Street. The area is in the New Cross and Evelyn wards of the Borough. Both wards have a high level of ethnic diversity and social and economic deprivation (with both wards having some of the worst levels of deprivation in the country).
- 1.9. The Order Land itself forms part of what is known as the Deptford Southern Housing regeneration scheme. The Deptford Southern Housing regeneration scheme is across two separate sites, the Tidemill site and the Amersham Vale site. The two sites are linked since the homes available on both sites are prioritised for allocation to the original tenants and resident leaseholders of the Order Land.

2. The order land: location, features and present use

- 2.1. The Order Land is part of the wider Tidemill site. It is proposed to be redeveloped as phase 3 of the Planning Permission. As set out above, the Order Land is principally in use as residential dwellings, comprising 15 x 2 bed maisonettes and 1 x 4 bed maisonette, with associated hard standing and communal garden, and an electrical sub-station. The Order Land is 0.244 hectares in size.
- 2.2. A housing needs assessment was carried out with residents in both the Giffin Street and Reginald Road blocks in June 2012. This showed that there are various issues including overcrowding and accessible homes requirements which were and are not being met by the housing that was and is located on the Tidemill site (including the housing on the Order Land which has not yet been demolished in accordance with the consent provided by the Planning Permission).
- 2.3. The Order Land is located to the north of Reginald Road, which comprises Victorian terraces houses and a mix of 1970s and 1960s local authority built housing. It is located to the east of Deptford High Street, close to Deptford train station. The site is well connected, with a choice of DLR, rail and overground stations a short walk away. To the north are the Deptford Lounge and Wavelengths Leisure Centre.
- 2.4. The Order Land comprises a total of two plots on which the Council is seeking powers of compulsory acquisition (albeit that agreement has been reached for the purchase of

one of these plots, meaning that there is only one interest in the Order Land which the Council considers it would be necessary to compulsorily acquire). These plots are coloured red on the Order Map and are highlighted in the inserts. A description of each plot is set out in the Order Schedule and is more generally described as follows:

2.4.1.12 Reginald Road, SE8 4RY – 2 bedroom maisonette

2.4.2.30 Reginald Road, SE8 4RY – 2 bedroom maisonette

3. The proposals for the redevelopment of the Order Land

- 3.1. In May 2006, officers of the Council commenced initial design and feasibility work with respect to the Council's intent and aspirations for regeneration for a number of sites in the area of Giffin Street in Deptford. A final report was published in March 2007 jointly by Lewisham Council and PTE architects called "*Tidemill School, The Lewisham Lounge and Giffin Street Regeneration Area*".
- 3.2. In the summer of 2007 officers subsequently prepared a Business Case to demonstrate the commercial and financial viability of the proposed regeneration programme and to identify the commercial approach to its development. A key element of the Business Case was the delivery of a baseline housing scheme of 251 new homes of mixed tenure and split (by habitable room) approximately 65% private and 35% social and affordable. It was determined that the housing element, known as Deptford Southern Housing, would be the final phase of the wider regeneration.
- 3.3. A new school, extension to the Wavelengths Leisure Centre, new parking boulevard, Deptford Lounge and Charlottenburg Park have all been delivered as part of the regeneration to date. The redevelopment of the Tidemill site (and the Order Land within it) is thus the final phase of a multi-phased regeneration scheme in Deptford.
- 3.4. The Deptford Southern Housing Scheme comprises both the Tidemill site and the Amersham Vale site. The Council has worked in partnership with Peabody on both sites and Sherrygreen Homes on the Amersham Vale site. The Amersham Vale site is near completion. Secure tenants and resident leaseholders currently living in 2-30A Reginald Road have priority for the new affordable homes with any remaining social rented homes being let through our choice based letting scheme, Lewisham FindYourHome.
- 3.5. The Tidemill site is divided into three phases, with work already underway on Phases 1 and 2. Secure tenants and resident leaseholders currently living in 2-30A Reginald Road will also have priority for these new homes with the remaining social rented homes being let through Lewisham FindYourHome.
- 3.6. The Planning Committee Report for the Planning Permission is at **Appendix D**, and the minutes from the confidential Report to the Mayor and Cabinet of March 2018 which reported on the increase in the amount of affordable homes to be provided as part of the wider scheme is at **Appendix E**. The scheme plans for the Planning Permission are at **Appendix F** and the s. 106 Agreement (which provides, among other matters, for the provision of affordable housing on the Tidemill site, including on the Order Land) is at **Appendix G**.
- 3.7. The Planning Permission for the wider scheme on the Tidemill site provides for the comprehensive regeneration and improvement of the site. In addition to the refurbishment and conversion of the two existing school buildings on the site, and the construction of high quality new residential accommodation, the Planning Permission provides for a significant amount of high quality communal open space.

- 3.8. The Order Land will have one of the new blocks of residential accommodation approved by the Planning Permission, this will be on the south western edge of the development. The new blocks across the wider site will have a range of sizes, in order to both define the new open space and to connect back to the existing street pattern. A setting is created for the historic school building, opening up views from the south. The buildings will share an architectural language, robust brick walls with large windows and balconies, deep window reveals and textured brick feature panels. The new buildings will be distinguished by their: good quality stock brick; large, glazed windows, full height to most living spaces; textured brick feature areas, used as a base course and for brick panels; metal cladding to set back top floors; and with landscape and boundaries designed to complement the new and old buildings.
- 3.9. The design approach has ensured that the affordable and market homes have very similar design, quality and space standards so that the redevelopment appears “tenure blind” to outsiders. In addition, the redevelopment will secure the following matters:
- 3.9.1. Energy: centralised CHP system to heat all parts of the site; PVs will be installed to generate additional electricity; the buildings will meet current Building Regulations; the proposed buildings will have a ‘fabric first’ approach, with low U-values, and high levels of airtightness to minimise the demand for space heating; ventilation will be by an MVRH ventilation system, maximising the heat recovery of exhaust air; and water usage will be limited by low-flow fittings and low-flush cisterns.
- 3.9.2. Secure by design: publicly accessible areas are well overlooked by living spaces; routes are clear and direct through the site; boundaries are well defined with railings and hedges; rear gardens are to be private for use only by residents; front entrance doors are all towards pavement frontages or the new park; blocks are designed with around 20 flats per entrance as a maximum; there are clear views through the site; all homes have private defensible space with small front gardens or patio terraces.
- 3.9.3. Accessible and wheelchair adaptable units: dwellings suitable for wheelchair users are provided in accordance with planning requirements, with 17 adaptable units provided at the Tidemill site, and a total of 10% wheelchair dwellings across the Tidemill site and at the Amersham Vale site. In addition, the new buildings will have modern communal entrances and lifts, making them accessible to a wider range of individuals.
- 3.10. The main central space of the scheme will be immediately adjacent to the new housing proposed on the Order Land. This high quality communal open space will be arranged to capture a good proportion of sunlight and provide an amenity space for residents and visitors alike. This space will be arranged like a more formal London square, and will ensure that north-south access through the wider site is clear and direct, supporting pedestrian movement from Deptford Bridge DLR and Reginald Road through to Giffin Street and Deptford High Street. The park is designed to have excellent natural surveillance from the adjacent residential apartments.
- 3.11. In summary, therefore, the redevelopment of the Tidemill site, including the Order Land, will deliver:
- 3.11.1. Refurbishment and conversion of the two existing school buildings on the site, into 51 residential units and the construction of 158 new residential units.

- 3.11.2. Affordable housing provision, comprising 117 social rented homes and 41 shared ownership homes.
 - 3.11.3. Private amenity space to each flat or maisonette (except for some units within the retained, refurbished school buildings).
 - 3.11.4. Communal open space in the form of a pocket garden, communal gardens, a public realm at the centre of the site and a communal square.
 - 3.11.5. Secure cycle parking spaces for 278 bicycles.
 - 3.11.6. All new homes are to be designed to Lifetime Home standards.
 - 3.11.7. A range of existing and proposed landscaped areas including private gardens and communal amenity spaces will be provided.
 - 3.11.8. 9% of new homes designed to be suitable for residents with disabilities (4 wheelchair adapted housing units and 13 wheelchair adaptable housing units will be provided).
 - 3.11.9. Modern homes meeting the latest design standards including environmental and energy efficiency standards.
 - 3.11.10. Social value through employment and skills opportunities for local residents.
- 3.12. Specifically relating to the Order Land, the proposals will deliver:
- 3.12.1. 65 new homes - an increase of 49 homes in total, including the re-provision of 13 social rented homes, an increase of 25 social rented homes and the introduction of 27 shared ownership homes available to residents on lower incomes. Breakdowns are provided in the tables at 3.13 to 3.15.
 - 3.12.2. A private communal garden for the exclusive use of the 65 households.
 - 3.12.3. Modern homes meeting the latest design standards including environmental and energy efficiency standards.
 - 3.12.4. Modern communal entrances with stairs and lifts, cycle and refuse storage.
 - 3.12.5. Increase of larger family homes.
- 3.13. The new homes, to be delivered specifically on the Order Land by tenure is set out in the table below:

Tenure	Current	New
Social rented	13	38
Leasehold	3	0
Shared ownership	0	27
Private sale	0	0
TOTAL	16	65

3.14. The tenure and unit mix proposed for the Order Land are:

	Social rented (LAR)	Shared Ownership
1 bed	18	12
2 bed	10	8
3 bed	3	7
4 bed	7	0
TOTAL	38	27

3.15. The comparison of current rented unit mix against the proposed scheme is:

	Current	Proposed	Difference
1 bed	0	18	+18
2 bed	12	10	-2
3 bed	0	3	+3
4 bed	1	7	+6
TOTAL	13	38	+25

3.16. As demonstrated in the tables above, the scheme will not only provide an increase in the amount of homes, including affordable homes, but will also introduce a variety of bed size properties. The Council will have nomination rights to the social rented homes which will be made available to households on the Housing Register.

3.17. The Order Land will be required within two years. As soon as vacant possession of the building within the Order Land has been achieved, the site of the Order Land will be immediately transferred to Peabody for the agreed re-development to proceed. The development on the Order Land will be completed within three years of acquisition.

4. Exercise of powers under section 17 of the Housing Act 1985

4.1. Section 17 of the 1985 Act states:

“17.Acquisition of land for housing purposes.

(1) A local housing authority may for the purposes of this Part—

(a) acquire land as a site for the erection of houses,

(b) acquire houses, or buildings which may be made suitable as houses, together with any land occupied with the houses or buildings,

(c) acquire land proposed to be used for any purpose authorised by sections 11, 12 and 15(1) (facilities provided in connection with housing accommodation), and

(d) acquire land in order to carry out on it works for the purpose of, or connected with, the alteration, enlarging, repair or improvement of an adjoining house.

(2) The power conferred by subsection (1) includes power to acquire land for the purpose of disposing of houses provided, or to be provided, on the land or of disposing of the land to a person who intends to provide housing accommodation on it or facilities which serve a beneficial purpose in connection with the requirements of persons for whom housing accommodation is provide].

(3) Land may be acquired by a local housing authority for the purposes of this Part by agreement, or they may be authorised by the Secretary of State to acquire it compulsorily.

(4) A local housing authority may, with the consent of, and subject to any conditions imposed by, the Secretary of State, acquire land for the purposes of this Part notwithstanding that the land is not immediately required for those purposes; but an authority shall not be so authorised to acquire land compulsorily unless it appears to the Secretary of State that the land is likely to be required for those purposes within ten years from the date on which he confirms the compulsory purchase order.”

- 4.2. Paragraphs 146 to 147 of the Guidance explains that acquisition must achieve a quantitative or qualitative housing gain, and that current practice (consistent with what the Council proposes in this matter) is for authorities acquiring land or property compulsorily to dispose of it to the private sector, housing associations or owner-occupiers.
- 4.3. For the reasons set out in this Statement of Reasons, the Council considers that the matters necessary to justify the use of the powers in section 17 of the 1985 Act have been demonstrated, including because of the quantitative or qualitative housing gain that will result in the short term, as well as the compelling reasons in the public interest for making the CPO.
- 4.4. In line with the description of the proposals for the redevelopment of the Order Land, there is no question that the land will be required for housing purposes within ten years. The land is required immediately. It represents phase 3 of the three phase redevelopment of the Tidemill site. In this regard, and to support the high number of affordable properties being delivered, Peabody have secured £5.6m in grant funding from the GLA under their Affordable Homes programme. As part of the grant agreement, Peabody are required to meet certain deadlines, including achieving a start on site of Phase 3 by March 2023.

5. Justification for use of compulsory purchase powers

(i) The purpose of the use of compulsory purchase powers

- 5.1. The Order Land is required for the construction of Phase 3 of the Tidemill site, which is described in section 3, above. The land is necessary to allow for the final development of the Deptford Southern Housing regeneration scheme. The Order is needed to secure the necessary land assembly and unification of ownerships, within a reasonable timescale.

- 5.2. The Council has used and continues to use considerable efforts to acquire the outstanding interests by negotiation. A summary of the position on negotiations is set out in Section 7 of this Statement of Reasons. This includes information about the significant mitigations offered to leaseholders, which have provided them with the opportunity to secure a replacement home within the new residential units being provided as part of the Deptford Southern Housing regeneration scheme. However, the Council has been unable to communicate with one leaseholder, despite considerable efforts by the Council and its agents to contact the leaseholder.
- 5.3. The position therefore is that there is one leasehold interest in the Order Land which the Council expects it to be necessary to compulsorily acquire (together with any unknown interests which reasonable searches have not identified, but which may arise). By compulsorily acquiring this one leasehold interest, the Council will be able to secure the delivery of all the substantial quantitative and qualitative housing benefits described in this Statement of Reasons, together with enabling the wider regenerations aims for this site and the area to be fully realised.

(a) Meeting urgent housing needs

- 5.4. There is an urgent need for additional housing, including affordable housing, in London, generally, and in Lewisham in particular:

The London Plan

- 5.4.1. The London Plan confirms that London requires 66,000 additional homes per year to meet its housing needs. That requirement cannot however be met due to supply constraints, meaning that the London Plan seeks to ensure that all London Boroughs maximise housing supply, and as a minimum sets out that they must plan to deliver the targets set out in the London Plan. For Lewisham, that target is 16,670 homes over the next 10 years (table 4.1, London Plan).
- 5.4.2. The London Plan recognises that achieving these housing targets will require “not just an increase in the number of homes approved, but also a fundamental transformation in how new homes are delivered” (paragraph 4.1.3). This requires that Boroughs must optimise the potential for housing delivery on all suitable and available sites, and must be proactive in looking to unlock and accelerate housing delivery including “through compulsory purchase and other forms of land assembly” (paragraph 4.1.4).
- 5.4.3. It is exactly these steps that the Council is seeking to take in this matter. That is, by reason of the CPO, the Council will ensure that it is able to optimise the potential of the Order Land, consistent with the Planning Permission that of course has already been granted.

The Local Plan

- 5.4.4. The objectives in the Council’s Core Strategy include providing for regeneration and redevelopment opportunities through the delivery of new homes and jobs (objective 1), providing for a substantial number of new homes during the plan period to meet local housing need, being the completion of an additional 18,165 net new dwellings (objective 2), and making provision of affordable housing and a mix of dwelling sizes and types including family housing (objective 3).
- 5.4.5. The Core Strategy explains that there is an “overwhelming housing need in Lewisham, which is spread across the borough... and for provision across a mix

of housing tenures as well as housing size” (paragraph 7.10), and that there is a “pressing need for more affordable housing..., which justifies [the] target of 50% affordable housing on new developments” (paragraph 7.11).

The Council’s Housing Priorities and Strategies

5.4.6. The Council’s Corporate Strategy (2018-2022) outlines the Council’s vision to deliver for residents. The strategy includes a priority to tackle the housing crisis, with aims to provide a decent and secure home for everyone. The specific commitments to 2022 include providing more social and genuinely affordable housing, delivering 1,000 new social homes, and building a new generation of homes for private rent, providing long-term tenancies of up to 10 years with rent controls.

5.4.7. The Council’s Housing Strategy (2020-2026) provides further background to the Council’s commitment to tackle the housing crisis. In setting the context for the Council’s proposed actions, the Strategy describes the background context as follows:

“There is currently not enough appropriate housing in Lewisham for everyone to have a safe, stable and genuinely affordable home. Too many people are unable to share in our borough’s successes because they desperately need better solutions to their housing problems.

Lewisham is the 12th most populated borough in London, with over 314,000 residents. The population is projected to grow to almost 390,000 residents by 2050, increasing pressure on housing in the borough too. We need to make sure our strategic direction, key priorities and actions address this, so that our residents can live independent prosperous lives.”

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“... there are not enough social homes to meet the demand. There are over 9,800 households on the housing register waiting for permanent homes. Of these, 2,500 are homeless and living in temporary accommodation.

It will take us over nine years to provide social homes to everyone on the housing register if the number of homes available stays the same, and if no more households are added to the register. It is likely that many of those on our waiting list will never move into social housing.

Homelessness has increased during the last 10 years and remains high. Almost 5,200 households approached us for homelessness assistance between April 2018 and March 2020. The main reasons for people becoming homeless are the ending of a tenancy in the PRS, or because family and friends can’t allow them to stay any more. Even though we are better at helping people earlier on, the numbers of households in crisis continues to rise.”

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5.4.8. The Housing Strategy then sets out five themes that relate to the provision of new affordable homes:

5.4.8.1. delivering the homes that Lewisham needs.

- 5.4.8.2. preventing homelessness and meeting housing need.
- 5.4.8.3. improving the quality, standard and safety of housing.
- 5.4.8.4. supporting our residents to live safe, independent and active lives.
- 5.4.8.5. strengthening communities and embracing diversity.

5.4.9. The Housing Strategy then includes the aim to deliver as many social rented properties as possible, through building council-owned homes at social rent, working with partners to deliver social rent homes in Lewisham, developing underused Council land and assets, being innovative in how the Council delivers homes, including using modern methods of construction, and making places where people want to live, through designing good quality housing and open spaces for residents.

5.5. The urgent need for additional housing in Lewisham, including affordable housing, has been a primary consideration in the regeneration plans for the Deptford Southern Housing Scheme. The redevelopment of the Order Lands in accordance with the Planning Permission fully accords with the recognition given to urgently delivering new affordable and market housing in both the development plan and the Council's relevant strategic corporate and housing objectives.

(b) Compliance with the development plan

5.6. The Council's Local Development Framework sets the vision, objectives, strategy and policies that will guide development and regeneration in the Borough up to 2025. The Lewisham Core Strategy (Core Strategy), the Lewisham Development Management Local Plan, the Lewisham Site Allocations Local Plan and the Lewisham Town Centre Local Plan, together with the London Plan, form the statutory Development Plan for the Borough.

5.7. This Statement of Reasons describes above how the CPO would facilitate meeting the planning objectives relating to urgently providing new housing in the Borough.

5.8. The replacement of the existing residential building with new development will meet other important planning objectives. Section 9.6 of the Core Strategy specifically sets out that the Council will seek to use compulsory purchase powers in order to achieve wider regeneration objectives. The adopted Site Allocations Local Plan June 2013 includes Strategic Site Allocation 3, the Giffin Street Redevelopment Area. This includes Phases 1 and 2 of the Tidemill site. Strategic sites are intended to act as a catalyst for regeneration of the wider area. Redevelopment of this site is thus a key regeneration and strategic priority for the Council.

5.9. Furthermore, Core Strategy objectives relating to climate change (through the provision of highly sustainable new dwellings), open spaces (through the improvement of the quality of, and the safeguarding of access to, public open space), protecting and enhancing Lewisham's character (through the provision of high quality development in place of the low quality building present on the Order Land), and community well-being (by addressing deprivation and inequality through greater access to affordable homes), will all be facilitated by the CPO.

5.10. The emerging Local Plan was considered by Mayor and Cabinet on 25 November 2020. This includes 2 – 30a Reginald Road as part of Phase 3 of the Tidemill site within the Giffin Street Redevelopment Area, now known as 'Land north of Reginald Road and

south of Frankham Street (former Tidemill School)'. The emerging Local Plan is consistent with the Planning Permission, and reflects the decision already made by the Council when granting Planning Permission that redevelopment of the Order Land as part of the wider redevelopment of the Tidewell site accords with the development plan, and will be to the benefit of the wider community.

(c) No alternatives

- 5.11. It is also of significance that there are no alternatives that can deliver the same housing and regeneration benefits with the existing maisonette block at 2 – 30A Reginald Road staying in place. No alternatives have been proposed by any individual or organisation. In any event, there are no alternatives which could obtain planning permission on a timescale sufficient to enable delivery in accordance with the requirements of the grant funding provided by the GLA in the sum of £5.6m (that grant funding requires a start on site of phase 3 by March 2023, else the funding will no longer be available).

(d) Conclusions on purpose

- 5.12. The delivery of the scheme approved by the Planning Permission is now only being prevented by a single residential leaseholder who is refusing to negotiate or indeed communicate with the Council. The delivery of housing on the Order Land will contribute not just to meeting the urgent housing needs for both Lewisham and London, but will accord with the Council's development plan and the further strategic objectives in the development plan relating to climate change, open spaces, community well-being, and other matters. Further reasons regarding the justification for the CPO are set out below, in respect of the matters arising specifically in respect of section 17 of the 1985 Act. .

(ii) Consideration of matters under section 17 of the Housing Act 1985

- 5.13. The matters set out below address the factors which the Council considers to be relevant from paragraph 147 of the Guidance. Certain of the matters in paragraph 147 do not apply to this CPO, or are addressed elsewhere in this Statement of Reasons. The information provided below is drawn principally from the Council's Strategic Housing Market Assessment 2019 ("SHMA"), which is attached as **Appendix H**.

(a) Total number of dwellings in the district

- 5.14. The Council has approximately 125,990 dwellings within the Borough (SHMA, paragraph 4.2). Of these, over one half (58.1%) are flats, apartments or maisonettes. 41.5% of properties are houses (of which 32.5% are terraced, 7.7% are semi-detached and 1.3% are detached houses) and 0.4% are bungalows. Of all occupied properties, 26.4% have one bedroom, 33.0% have two bedrooms, 30.4% have three bedrooms and 10.1% have four bedrooms (SHMA, paragraphs 4.4 – 4.5).
- 5.15. The proposed new dwellings on the Order Land will provide a mix of dwellings, ranging from 1 – 4 beds in size, and will contribute to the Borough's housing mix.

(b) Total number of substandard dwellings

- 5.16. The SHMA sets out at paragraphs 4.10 to 4.11 that the age profile of dwelling stock in the Borough shows that the majority of the Borough's dwellings (56.8%) were built before the end of the Second World War (37.3% pre-1919 and 19.5% in the period 1919-44). The SHMA goes on to explain that the English Housing Survey produces national data on dwelling condition. Applying national trends to the stock profile of the borough based on age would suggest that around 25.2% of dwelling stock is non-decent, which

is above the national average of 20.6%. The number of dwellings likely to fail the minimum standard of decent homes criteria is estimated to be 15.8% (compared with 11.9% nationally). However, this is only indicative and based on national data applied to the borough.

(c) Total number of households and the number for which provision needs to be made

- 5.17. The SHMA assumes a total of 125,990 dwellings across the Borough, with around 134,147 households. The population of the Borough is estimated to be 307,100 in 2018 and this is projected to increase by 18.6% to 364,200 by 2040. The increase in population will continue to drive the need for new homes in the Borough, and underscores why the London Plan has set a target for the Council to provide 16,670 new homes over the next 10 years.
- 5.18. Paragraph 4.62 of the SHMA goes on to set out that the 2011 Census found that there are around 36,000 households living in social rented (affordable) housing across the borough, accounting for 31% of all occupied dwellings. Having regard to income levels, the SMHA concluded at paragraph 4.98 that only social rent and affordable rent are affordable to Lewisham's households on lower quartile and median incomes.
- 5.19. As the SHMA set out, this raises serious concerns over the relative affordability of accommodation across most tenures within the Borough, and particularly for the key workers and wage earners considered. These matters all give rise to the risk that the ability of households to enter the general market without very substantial deposits is severely restricted.
- 5.20. As of October 2021, there were 2599 households being provided with temporary accommodation by the Council, including 812 in nightly paid. In total, there were 10,152 households (including nominated homelessness cases) on the Housing Register as of October 2021. In the financial year to 16 November 2021, there have been a total of 291 lets to applicants on the Housing Register. The below table sets out the bed size needs of those on the housing register and the average wait time for a suitable offer to be made for those in Band 1 (the highest need):

Bed size	Number of applicants	Average waiting time
Studio/1 bed	393	9 months
2 bed	144	5 months
3 bed	34	2 months
4 bed	7	2 months
5 bed	5	18 months
6 bed	1	18 months

- 5.21. The waiting times for those in bands 2 and 3 are significantly longer, with the wait for example for a 2 bed home being 11 months (band 2) and 120 months (band 3), and the wait for a 3 bed home being 23 months (band 2) and 200 months (band 3). Within the borough, the greatest demand is for 2 and 3 bedroom properties, however, the availability of four bedroom properties means that those needing larger family homes are waiting the longest for a suitable offer.

- 5.22. The numbers on the Register have increased month on month this financial year demonstrating the lengthening gap between supply and demand. The net additional affordable homes that will be provided on the Order Land must be seen in this context.
- 5.23. The proposed new dwellings on the Order Land will provide an increase of 25 social rented homes and will introduce 27 new shared ownership homes, and will make a significant contribution to increasing the amount of affordable homes in the Borough. The Shared Ownership homes are another affordable tenure that will be made available to households in Lewisham who are otherwise excluded from homeownership and who may not be eligible to join the Housing Register.
- 5.24. The current properties on the Order Land (2-30A Reginald Road) are maisonettes. Access to eight of the maisonettes is at ground level, access to the remaining eight is via a communal stairwell. There is no lift in the communal area preventing allocation of vacated homes to residents with mobility issues. The ground floor maisonettes would require significant adaptations to make them accessible if required. The new homes are designed to Lifetime Homes Standards, and will have lifts to access front entrance doors. 11 of the new homes will be adapted/adaptable.

(d) Details of the authority's housing stock by type

- 5.25. The SHMA (paragraph 4.82) sets out that in terms of the tenure split, the 2011 Census shows that 43.6% of households live in owner occupation, 25.3% in private rented housing (the highest in the South East sub region) and 31.1% in affordable housing, although there are variations across the borough. GLA 2016 data based on the Annual Population Survey (APS) estimates that 49.2% of the housing stock in Lewisham is owner occupied, 27.6% social rented and 23.2% private rented. This is comparable with the London average, although the proportion living in affordable housing is slightly higher.
- 5.26. The 2011 Census data indicates that 55.3% of all occupied properties in the borough are flats and apartments. This varies significantly across tenures, with flats accounting for around three-quarters of private rented (73.5%) and social rented (71.4%) stock compared with only around one-third (33.2%) of owner-occupied properties. Across all properties, 44.7% are houses or bungalows (of which 28.3% are terraced, 13.2% semi-detached and 3.3% detached).

(e) Details of the prospective purchaser

- 5.27. On 12 February 2014 the Mayor and Cabinet agreed to the selection of a consortium of Family Mosaic (now Peabody Trust), Sherrygreen Homes and Mulalley as the preferred development partner for the two sites that make up the Deptford Southern Housing element of the wider Deptford regeneration.
- 5.28. This consortium has forged ahead with developing phases 1 and 2 of the Planning Permission, on the rest of the Tidemill site, and are ready and able to proceed with phase 3 on the Order Land. The Peabody Group owns and manages more than 67,000 homes across London and the South East. Sherrygreen Homes is the residential arm of the Sherrygreen group of companies. It has over more than 1500 units in its current and future development pipelines.

(iii) Implementation of the compulsory purchase order

- 5.29. In July 2015, Mayor and Cabinet agreed that Council owned land within the scheme should be appropriated for planning purposes. As set out above, the Council is the

freehold owner of the Order Land and owns the majority of the interests within it. The properties within the Order Land do not lie within a conservation area and there are no listed buildings included in the Order. There is no special category land or consecrated land included in the Order. As set out above, the Order Land benefits from the Planning Permission, which has been implemented with the progression of phases 1 and 2 of the proposed redevelopment of the Tidewell site. There are in short no physical or legal impediments to the implementation of the compulsory purchase order.

(iv) Resources for the compulsory purchase order

- 5.30. Funding for the construction of the Deptford Southern Housing sites has been secured from a number of sources in order to make sure that the scheme is viable. This includes cross-subsidy from private home sales, and funding obtained via grants and subsidies both from the Council and from the Peabody Trust. The Council is providing £4.3m in funding and Peabody are also subsidising the scheme.
- 5.31. Furthermore, and as set out above, to support the high number of affordable properties being delivered, Peabody have secured £5.6m in grant funding from the GLA under their Affordable Homes programme. As part of the grant agreement, Peabody are required to meet certain deadlines, including achieving a start on site of Phase 3 by March 2023.
- 5.32. Given that the funding required to compulsorily acquire the single leasehold interest will be relatively modest compared to the cost of the scheme overall (it is anticipated that it is only the one leasehold interest that will be required to be compulsorily acquired), the Council is satisfied that there will be more than sufficient resources for the CPO.

(v) Compelling case in the public interest

- 5.33. Paragraph 2 of the Guidance states:

“Acquiring authorities should use compulsory purchase powers where it is expedient to do so. However, a compulsory purchase order should only be made where there is a compelling case in the public interest... When making and confirming an order, acquiring authorities and authorising authorities should be sure that the purposes for which the compulsory purchase order is made justify interfering with the human rights of those with an interest in the land affected.”

- 5.34. Paragraph 12 of the Guidance states:

“It is the acquiring authority that must decide how best to justify its proposal to compulsorily acquire land under a particular act. The acquiring authority will need to be ready to defend the proposal at any inquiry or through written representations and, if necessary, in the courts.”

- 5.35. Paragraph 13 of the Guidance states:

“The minister confirming the order has to be able to take a balanced view between the intentions of the acquiring authority and the concerns of those with an interest in the land that it is proposing to acquire compulsorily and the wider public interest. The more comprehensive the justification which the acquiring authority can present, the stronger its case is likely to be.”

- 5.36. Having regard to all the above matters, the Council considers that there is a compelling case in the public interest for the making of the CPO. In particular, the making of the CPO will facilitate:

- 5.36.1. The delivery in the near future, as part of phase 3 of the Planning Permission, of 65 new homes, representing an increase of 49 homes in total. The need to provide for a very large number of new homes over the next decade underscores the importance of optimising the opportunity presented by the redevelopment scheme to provide this significant number of new homes.
- 5.36.2. The re-provision of 13 social rented homes, the addition of 25 social rented homes, and the introduction of 27 shared ownership homes available to residents on lower incomes. The high levels of deprivation in the Borough, the extremely long wait times for affordable rented homes, and the overall shortfall in affordable homes again underscores the importance of the CPO being made to optimise the affordable housing able to be provided on the wider site.
- 5.36.3. The construction of attractive, modern homes which will meet the latest design standards including environmental and energy efficiency standards. Compared to the low quality architecture of the building presently on the Order Land, the CPO will facilitate the cohesive and comprehensive regeneration of the wider Tidemill site, and will contribute to the overall regeneration of the area.
- 5.36.4. More accessible homes, with the CPO enabling the delivery of phase 3 which will comprise wheelchair adapted or adaptable homes, and a residential building with communal entrances with stairs and lifts.
- 5.37. Set against the one leasehold interest which the Council expects to need to acquire by this CPO, there is a clear and compelling case in the public interest for the making of the CPO.

(vi) Human rights considerations

- 5.38. Section 6 of the Human Rights Act 1998 (“the 1998 Act”) prevents public authorities from acting in a way which is incompatible with rights protected by the European Convention on Human Rights (“the Convention”).
- 5.39. Paragraph 12 of the Guidance advises that *“An acquiring authority should be sure that the purposes for which the compulsory purchase order is made justify interfering with the human rights of those with an interest in the land affected. Particular consideration should be given to the provisions of Article 1 of the First Protocol to the European Convention on Human Rights, and in the case of a dwelling, Article 8 of the Convention”*.
- 5.40. Article 1 of Protocol 1 provides that every natural or legal person is entitled to the peaceful enjoyment of their possessions. The right is qualified to the effect that no one is to be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law. Further, the right does not impair the right of a state to enforce such laws as it deems necessary to control the use of property in accordance with the general interest.
- 5.41. Article 8 provides that everyone has the right to respect for his private and family life and that there shall be no interference by a public authority with the exercise of this right except in accordance with the law, where there is a legitimate aim and where it is fair and proportionate in the public interest.
- 5.42. There has been considerable public consultation on the proposals to regenerate the Order Land, and much opportunity has been given throughout the planning process for interested third parties to make representations. There has furthermore been significant notification and consultation on the mitigation available to owners and occupiers of the

maisonettes, and their opportunity to secure a new home within the Deptford Southern Housing Scheme (i.e. the Amersham Vale and Tidemill sites) or elsewhere within the Borough.

- 5.43. In addition, on 23 November 2021, the Council wrote the most recent letter to the leaseholder who has refused to communicate with the Council or its agents about the proposed acquisition of their land. The letter sought information from the leaseholder showing what impact the CPO may have on any particular person living at the home of the leaseholder, including in respect of any particular care needs or if any person living there is a child. No response has been received to this letter. Despite efforts to find out information about the leaseholder and / or the occupants of the leaseholder's home, no such information has been provided.
- 5.44. Based on the information that it has been reasonably able to obtain, the Council is satisfied that any interference caused by the Order under either Article 1 of Protocol 1 or under Article 8 would be proportionate, having regard to the substantial and compelling public benefit which would accrue from the redevelopment of the Order Land. In determining the level of permissible interference, the courts have held that any interference must achieve a fair balance between the general interests of the community and the protection of the rights of individuals – there must be reasonable proportionality between the means employed and the aim pursued. The availability of statutory compensation to affected persons is relevant in assessing whether a fair balance has been struck. This has also been taken into account by the Council. Case law in a compulsory purchase context has determined that there is no requirement to set out in any formulaic way the extent to which individual human rights are interfered with, and that the necessary human rights balancing exercise is encompassed by the test of a compelling case in the public interest.
- 5.45. Article 6 of the Convention is also of potential relevance, regarding a person's entitlement to a fair and public hearing by an independent and impartial tribunal. As regards Article 6 rights the Scheme has been publicised and consultation has taken place with parties potentially affected by the Order. All those parties whose interests are identified and included in the Order will be notified and have the right to make objections or other representations to the Secretary of State for Levelling Up, Housing and Communities and to be heard at a public inquiry or by means of written representations. The statutory process and right for affected parties to pursue remedies in the High Court where appropriate, are compliant with Article 6.
- 5.46. The Council has carefully considered the balance to be struck between individual rights and the wider public interest and have also had regard to whether there are any alternative means of securing the redevelopment of the Order Land and the associated regeneration of the area. The Council's conclusion is that the interference with the rights of the remaining leaseholders is proportionate when weighed against the significant benefits which will be delivered by the scheme for the Borough and the wider community as set out in this statement.

6. Steps taken to negotiate the acquisition of the Order Land by agreement and proposals for rehousing displaced residents

- 6.1. In May 2013, Mayor and Cabinet agreed to the recommendation to include the Order Land in the plans for the Deptford Southern Housing Scheme. At the time, there were 13 secure tenants and 3 leaseholders.

(i) Secure tenants

- 6.2. Secure tenants were given the option to move into a new property on the Amersham Vale site, a new property on the Tidemill site or a property of their choice through 'Lewisham FindYourHome' (then called Lewisham Homeseach) – the Council's choice based lettings scheme (see **Appendix I**). Secure tenants have been guaranteed a 'like for like' offer so that they are not required to downsize even if they are now under occupying. Additionally, the rents in the new build property are protected social rents for decanting secure tenants, meaning that they will pay the same rent on a like for like basis as if they were to remain in the Reginald Road property. All secure tenants receive financial compensation in the form of a Homeloss Payment and disbursements.
- 6.3. Six of the original thirteen secure tenants have already moved to homes through 'Lewisham FindYourHome'. Two have chosen the option to be allocated new homes in the Amersham Vale site and are expecting to move this winter. Officers have been visiting the remaining 5 secure tenants to discuss their preferences including allocations to the new build homes on the Tidemill Phase 1 and 2 sites as well as through Lewisham FindYourHome. On 14 September 2021, Mayor and Cabinet agreed that officers could serve legal notices to commence possession proceedings if required and to suspend any Right to Buy applications. Officers will be commencing the formal possession proceedings on secure tenants in January 2022, by serving Notice of Seeking Possession on the remaining secure tenants. Initial Demolition Notices were served on 26 November 2021 to suspend any Right to Buy applications.

(ii) Leaseholders

- 6.4. Officers have contacted all three of the original leaseholders in 2-30A Reginald Road, including writing to them, inviting them to public meetings and offering home visits to discuss their circumstances and options on an individual basis. This includes the provision of independent financial advice for resident leaseholders from Peabody.
- 6.5. As part of their bid to be selected as the preferred partners for the development, Peabody (then Family Mosaic) put together an offer for leaseholders in 2-30A Reginald Road (see **Appendix J**). The summary of the options are as follows:
- 6.5.1. Non-resident leaseholders will have their properties bought back at market rate plus 7.5% of this as an additional, statutory home loss payment. As non-resident leaseholders have a primary residence away from the estate, neither the Council nor Peabody have a legal obligation to offer another property and the other options for resident leaseholders will not be open to non-residents.
- 6.5.2. Resident leaseholders have the opportunity to purchase a property on a 'nil rent' shared ownership basis i.e. shared equity. In order to allow resident leaseholders to continue to be part of the local community, the offer is to invest in a new home on either the Amersham Vale or Tidemill sites. With this option residents will be required to purchase a minimum of 25% of the value of the new property.
- 6.5.3. Resident leaseholders also have the opportunity to purchase a property on a shared ownership basis. This option is for resident leaseholders who cannot transfer their existing mortgage or take out a new one. With this option, leaseholders will be expected to invest the equity that they hold in their current property to purchase a minimum of 25% of the value of a new property and pay rent to Peabody on the remaining percentage.

- 6.5.4. In addition to the above options, resident leaseholders are able to receive the full open market value of their property and move away. The leaseholder will then make their own arrangements for new accommodation.
- 6.5.5. Resident leaseholders are also able to purchase a new property outright on the new development. This option is for leaseholders who can afford and want to buy a new home in the development outright.
- 6.5.6. Resident leaseholders will be entitled to a Disturbance Allowance that will cover their reasonable moving expenses and a Homeloss Payment of 10% of the value of their current home. This applies in all of the options above.
- 6.5.7. In very exceptional circumstances, an individual's financial circumstances may be such that it is not sustainable for them to continue as a leaseholder (or they may not be able to buy the required 25% share). In these cases there is an option to become a tenant.
- 6.6. At the time of the scheme being first proposed, there were three leaseholders at 2-30A Reginald Road, including two recorded as being resident leaseholders. Strutt and Parker were appointed to act as the Council's valuer in November 2015. Strutt and Parker have been instructed to value properties at full market value un-blighted by the development proposals and to initially negotiate on the same terms as if a Compulsory Purchase Order had been obtained. This includes the leaseholder being able to instruct their own surveyor and legal representatives, with the Council reimbursing all reasonable costs. It also includes the Council meeting all reasonable costs relating to an onward purchase (if applicable).
- 6.7. Strutt and Parker are also appointed to act on behalf of the Council in formal CPO negotiations. Strutt and Parker have contacted all the leaseholders on numerous occasions, offering to undertake a no-obligation valuation. Council Officers have also contacted leaseholders to discuss their options. At the time of writing, Strutt and Parker have completed and negotiated the valuations for two of the three leasehold properties.
- 6.8. In June 2020, following a period of negotiation, officers completed the purchase of one of the leasehold properties. This was a non-resident leaseholder. Following a period of negotiation, terms have been agreed with one of the remaining resident leaseholders who is progressing with the purchase of a new home on the Amersham Vale site in line with the leaseholder offer.
- 6.9. Following attendance at a public meeting in February 2017 in which leaseholder options were discussed, the remaining leaseholder has failed to make any further contact despite numerous attempts by Council Officers and Strutt and Parker. This has included ten letters, a fixed home visit appointment (no response), four 'cold calls' and invites to drop in sessions.
- 6.10. Officers have written to the leaseholder on 23 November 2021 offering the opportunity to discuss his options with an independent advisor. As yet, this offer has not been accepted. In the same letter, officers have also sought any representations on how the CPO would affect the leaseholder(s) and / or any occupants of the leaseholders' home. No response has been received to this letter to date.
- 6.11. As with all previous estate regeneration schemes, officers will be making every effort to acquire this property by agreement. However, in view of the requirement for the Council to provide vacant possession of the site by early 2023, the use of the compulsory purchase powers is required so as to avoid delay and uncertainty and to secure the

objectives of the scheme and the funding requirements, all of which are in the public interest.

7. Equality matters

7.1. The public sector equality duty is set out in s. 149 of the Equality Act 2010. S. 149, so far as material, provides as follows:

“(1) A public authority must, in the exercise of its functions, have due regard to the need to –

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.”

7.2. The Council has taken the following steps to understand whether any of the matters set out in s. 149 will be impacted by the CPO:

7.2.1. On 11 September 2013, Mayor and Cabinet approved an Equalities Analysis Assessment (EAA) which considered the impact of the proposed Deptford Southern Housing regeneration scheme. This outlined that there are equalities implications in the decanting and rebuilding process and there will also be benefits in the completed scheme. Officers have continued to assess equalities impacts continuously through the scheme.

7.2.2. The Council has considered the equalities implications for the residents living in 2-30A Reginald Road but also the households on the Housing Register who will benefit from the proposed new homes on the site. In terms of the residents of 2-30A Reginald Road, whilst the impact on all key protected characteristics have been considered, the primary focus has been on disability, household type, income and language spoken.

7.2.3. As part of the decant service provided by the Council, residents have dedicated officers who provide a bespoke service to assist them through the process of moving. This service includes drop-in events, one to one interviews and access via email and telephone. This allows officers to identify and provide any requirements that an individual may have to be able to communicate such as translation services or advocacy. Officers have met with all secure tenants and leaseholders and have provided advocacy where needed and offered access to independent advice. There has been no requirement for translation services.

7.2.4. As set out in this statement, the offer to all secure tenants and resident leaseholders is a new home on a protected rent. All resident leaseholders are entitled to a shared equity offer where they do not pay rent on the unowned equity. Both of these mean that residents, the majority of whom are on low incomes, are able to retain a secure home, in the same location without a financial impact that would otherwise be the case when relocating. Additionally, residents receive a home loss payment and disbursements to mitigate the cost of moving home.

- 7.2.5. In terms of the allocation of new homes, the offer to residents is that they can be allocated a property on a like for like basis, meaning that even if they are under occupying their current home, they will be able to have a new home of the same size.
- 7.2.6. When assessing residents for an alternative home, officers' conduct a medical assessment and, if necessary, an occupational therapy assessment. The Council will only offer a property that meets the needs of a household as assessed. As stated, wheelchair accessible homes are being provided as part of the new development however, at this time none of the remaining residents have identified as requiring such a property.
- 7.2.7. The one remaining leaseholder did meet officers at a public meeting, but has since failed to engage. As set out above, on 23 November 2021, the Council wrote to the leaseholder seeking information about what impact the CPO may have on any particular person living at the home of the leaseholder, including in respect of any particular care needs or if any person living there is a child. No response has been received to this letter. Despite efforts to find out information about the leaseholder and / or the occupants of the leaseholder's home, no such information has been provided.
- 7.3. Having taken the above steps, the Council considers that the CPO has the potential to have the following impacts:
- 7.3.1. It is considered that the CPO will have no negative impacts in respect of the elimination of discrimination, harassment, victimisation, and any other conduct that is prohibited by or under the Equality Act 2010.
- 7.3.2. It is considered that the CPO has the potential to assist in advancing equality of opportunity. The provision of replacement and additional, high quality, affordable homes will enable increased access to such homes by persons with protected characteristics. The Borough is very diverse, with a population that is 54% white and 46% BME, with over 70 nationalities on the electoral roll. A key part of the Borough's Housing Strategy is to "ensure that the diversity that makes Lewisham so strong is reflected in our housing with mixed communities and a variety of tenure types" (page 3). The scheme will assist in realising this aim. Moreover, the offer to re-house all existing residents on the Order Land in new affordable homes will improve their living conditions and amount to further advancements in equality of opportunity.
- 7.3.3. For the same reasons, it is considered that the CPO has the potential to assist in fostering good relations between persons who share a relevant protected characteristic and persons who do not share it. The provision of additional and extra affordable housing that is accessible to all will enable the provision of mixed communities which will foster good relations.
- 7.4. So far as the individual leaseholder who has not communicated with the Council is concerned, the Council has sought but has not been provided any information by the leaseholder about any matters which could relate to the PSED because of their personal circumstances. Should the leaseholder provide information, officers will carry out a further EEA.
- 7.5. Having regard to the above matters, the Council considers that the positive benefits of the redevelopment scheme on the Order Land would outweigh any negative effects. As already set out above, the positive benefits are substantial, and will mean the provision

of a greater number of higher quality, accessible, sustainable and affordable homes for residents of the Borough. Given the highly diverse population within the Borough, and the demand for accessible residential accommodation (including for wheelchair users) the Council considers that the redevelopment scheme would advance equality of opportunity and foster good relations between persons who share a relevant protected characteristic and those who do not.

8. Documents relating to the compulsory purchase order

8.1. In the event of a public inquiry being held, the Council would intend to refer to or put in evidence this Statement of Reasons and the documents appended hereto, as well as the following documents:

8.1.1. Relevant extracts from the Housing Act 1985 and from relevant Acts relating to compulsory purchase of land, including the Acquisition of Land Act 1981

8.1.2. Order and Order Map

8.1.3. Existing site plan and phase plan

8.1.4. Planning permission and approved plans

8.1.5. Relevant extracts from the London Plan

8.1.6. Relevant extracts from the Council's Core Strategy

8.1.7. Lewisham Allocations Policy

9. Conclusion

9.1. In conclusion, development pursuant to the purposes of the CPO will be in accordance with the 1985 Act and related provisions under the Acquisition of Land Act 1981, relevant planning policy and strategic aims of the Council, and will bring substantial public benefits. There are no impediments to the delivery of the redevelopment of the Order Land, and no question that housing would not be delivered within 10 years. To the contrary, the developers of the Order Land are proceeding with phases 1 and 2 and intend to proceed with phase 3 as soon as practicable. The purposes for which the Order Land is to be acquired could not reasonably be achieved by any other means. In summary, there is a compelling case in the public interest for the compulsory acquisition of the Order Land, and the Order should be confirmed.

10. Contact details

10.1. Information about the scheme is available on the Council's website at: <https://lewisham.gov.uk/inmyarea/regeneration/deptford/deptford-centre/tidemill-development-faq>.

10.2. The documents may be inspected during normal office hours at the Council's offices at: **Legal Services, 4th Floor, Laurence House, Catford, London, SE6 4RU.**

10.3. You are requested to make an appointment before attending.