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CABINET	12 th November 2025
Subject Heading:	Harold Hill Town Centre - Chippenham Road Making of a Compulsory Purchase Order
Cabinet Member:	Councillor Graham Williamson – Cabinet Member for Regeneration & Development
SLT Lead:	Neil Stubbings – Strategic Director of Place
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Policy context:	London Plan 2021; Havering Local Plan 2016-2031; 12 Estates Regeneration Programme; Havering and Wates Regeneration LLP Business Plan.
Financial summary:	This report seeks Cabinet approval to make a Compulsory Purchase Order (CPO) to support the land assembly required for the delivery of the Chippenham Road regeneration scheme. The costs

associated with the acquisition of land and property interests, including professional and legal fees, will be met from capital budgets already allocated to the Council's 12 Estates regeneration programme. Additional detail is set out in the Financial Implications section of this report.

Is this a Key Decision?

Yes - expenditure or saving (including anticipated income) of £500,000 or more

When should this matter be reviewed?

If required, 12 months after the Cabinet decision, or upon confirmation of the Compulsory Purchase Order (CPO), whichever is sooner

Reviewing OSC:

Place OSSC.

The subject matter of this report deals with the following Council Objectives

People - Things that matter for residents X

Place - A great place to live, work and enjoy X

Resources - A well run Council that delivers for People and Place.

SUMMARY

1.1 This report outlines the progress made on land assembly at Chippenham Road and seeks Cabinet approval to authorise the making of a Compulsory Purchase Order (CPO) to acquire the remaining land and property interests necessary to facilitate the regeneration of the site. This is a request for final approval to make the CPO.

1.2 The Chippenham Road scheme forms a key part of the Harold Hill Town Centre regeneration proposals and is essential to deliver new affordable homes and associated public realm improvements. The site has been identified as a priority within the 12 Estates regeneration programme and is considered critical to meeting the Council's housing delivery and placemaking objectives.

1.3 The following recommendations are made on the basis that a CPO is considered necessary to secure delivery of the Chippenham Road regeneration scheme, in accordance with planning policy and the Local Plan. The Scheme will promote the economic, social, and environmental well-being of the area and is deliverable within a reasonable timescale. Equitable steps to acquire land by agreement have been taken and there is no viable alternative to the use of CPO. The Council's actions are proportionate, in line with human rights and equalities duties.

RECOMMENDATIONS

That Cabinet:

2.1 Resolve that there is a compelling case in public interest for the Council to make a Compulsory Purchase Order (CPO).

2.2 Resolve that the public interest in making a CPO outweighs interference with rights under the Human Rights Act 1998.

2.3 Agree to the Council making a Compulsory Purchase Order (CPO) pursuant to the statutory powers contained in section 226(1)(a) of the Town and Country Planning Act 1990 (as amended), and section 13 of the Local Government (Misc. Provisions) Act 1976 and all other necessary action to acquire all property and other proprietary interests on the land, including where appropriate new rights, located within the outline on the CPO Red Line Plan at Appendix B, for the purposes of delivering the new homes and regeneration of Chippenham Road.

2.4 Agree that the Strategic Director of Place, in consultation with the Leader of the Council, Deputy Director Legal and Governance and Strategic Director of Resources be authorised to:

- 2.4.1 Make the CPO or multiple CPOs to enable the acquisition of land, interest and rights within the CPO Red Line Plan as attached to this report at Appendix B;
- 2.4.2 Appoint surveyors, solicitors, barristers and any other professionals required to promote the CPO(s) and to facilitate the vacant possession of interests located within the CPO Red Line Plan;
- 2.4.3 Settle the final form and content of the CPO(s) and associated documentation to include the;
 - CPO Schedule of Interests - Appendix A;
 - Plans identifying location and extent of interests subject of the proposed CPO - Appendix B;
 - Equalities Impact Assessment - Appendix C;
 - Statement of Reasons - Appendix D;
 - Community Engagement - Appendix E;
 - Financial Implications - Appendix F (Exempt)
- 2.4.4 Make amendments to the CPO if necessary, including a reduction or increase to the extent of the land included in the draft Order Map.
- 2.4.5 Take all necessary steps to secure the making, confirmation and implementation of the CPO(s) including publication and service of notices and presentation of the Councils case at Public Inquiry, or Court should such representation be necessary;
- 2.4.6 Take such actions to continue attempts to acquire properties and proprietary interests within the CPO Red Line Plan by agreement, such actions to include; the relocation of residents and statutory undertakers apparatus or Communication Code Operators; and any other interests and setting out the terms for the withdrawal of objections to the CPO(s); and
- 2.4.7 Pay all costs associated with making the Order, including the compensation payable to landowners and their professional fees;
- 2.4.8 Appointing external consultants to assess, agree and pay any compensation and claims arising from redevelopment of the Order Land pursuant to the Order;
- 2.4.9 Following the confirmation of the CPO(s) by the Secretary of State, secure vacant possession of all properties and proprietary interests located within the confirmed CPO Red Line land to include:
 - 2.4.9.1 to take all necessary actions to secure the making and confirmation of a General Vesting Declaration (GVD) or multiple GVD's under the Compulsory Purchase and (Vesting

- Declarations) Act 1981 and /or to serve Notices to Treat and Entry (if required); and
- 2.4.9.2 to appropriate to planning / or housing purposes as necessary, any parcel of land within the CPO Red Line Plan under Section 203 of the Housing and Planning Act 2016; and
- 2.4.9.3 if necessary make representation to the Upper Tribunal (Lands Chamber) or court should such representation be appropriate.

2.5 Agree that in the event that the Cabinet approves resolutions 2.1 and 2.2 above, and upon the Deputy Director Legal and Governance being satisfied that further information and all the Equalities Impact Assessment outcomes are satisfactory and to not require reference back to Cabinet, that the Deputy Director Legal and Governance be authorised to affix the common Seal of the Council to the CPO(s), GVD(s), maps and elsewhere and to take all necessary steps as necessary, such as to issue notices and sign certificates to attain the resolutions above.

2.6 Note that:

Any expenditure associated with the following will be met from the Council's existing approved budgets:

- a) preparatory work required to make the Compulsory Purchase Order; and
- b) payment of compensation arising from the CPO, together with the associated capital costs required to undertake the construction works.

REPORT DETAIL

3.1 The London Borough of Havering's 12 Estates programme is a major regeneration initiative aimed at revitalising several estates and surrounding land across the borough. As part of this ambitious programme, the Harold Hill Town Centre area is identified for significant redevelopment. Within this broader plan, the Chippenham Road area, part of the southern area of Harold Hill Town Centre has been identified as a key site for regeneration and provision of new homes.

3.2 The Site is located in Heaton Ward, in the north of the borough, and extends to approximately 0.96 hectares. It comprises two parcels of land, shown edged red on Appendix B, separated by a central plot containing three two-storey buildings in use as a Vicarage, Funeral Services, and a Church Centre.

3.3 The Site accommodates a mix of two and three storey residential buildings (24 flats and 8 houses), the Alderman Public House, and the former LBH Housing Office, together with associated hardstanding and car parking areas. Most of the buildings are now vacant, and phased demolition has already commenced.

3.4 At the Cabinet meeting on 13 February 2019 an update was provided that said "where required, as a measure of last resort, the Council will issue Notices of Seeking Possession to Council tenants living on estates. Tenants have been notified of the process, and had access to 1-2-1 support from LBH Officers. In addition to

this officers may request that Cabinet consider giving approval to make a Compulsory Purchase Order (CPO). Approval will be sought as and when required”.

3.5 In response to escalating reports from May 2023 of antisocial behaviour (ASB) in Rothbury House, one of the residential blocks on the site, including drug-related nuisance, vandalism, and unauthorised gatherings causing significant disruption in communal areas, a Closure Order was issued on 8 March 2024 under Section 80(5) of the Anti-Social Behaviour, Crime and Policing Act 2014. This legislation allows a local authority to seek a Magistrates’ Court order to restrict access to a property for up to three months, with the option to extend for a further three months. The initial Order was granted for three months and later extended on 6 June 2024, reaching the maximum six-month duration.

3.6 The closure was necessary due to the vulnerability of Rothbury House (1–12), which had been largely vacated, leaving one abandoned council property and another empty unit. The site became a hotspot for crime and ASB, severely affecting the local community and nearby businesses. The Order prohibited all individuals from entering or residing in the premises except Council staff, contractors, and emergency services.

3.7 With the Closure Order now concluded, the regeneration scheme provides a long-term solution to the issues that led to the ASB, addressing the root causes by replacing the obsolete, vacant buildings with new, high-quality housing. The redevelopment will maximise the site’s capacity through the demolition of all existing buildings and the construction of four residential blocks providing 138 affordable housing units, together with landscaping, car and cycle parking, plant, and associated works.

3.8 Three related planning applications have been submitted and granted:

3.8.1 F0003.23 – Prior approval for the demolition of the existing structures on the site, granted on 7th September 2023;

3.8.2 P1274.23 – Full planning application for the demolition of all existing buildings, including the Alderman Public House, granted 27th February 2025;

3.8.3 P1150.24 – Full planning application for the redevelopment of the site to provide 138 affordable housing units with associated landscaping, public realm, car and cycle parking, and other ancillary works. Resolved to grant planning permission 27th February 2025.

3.9 The scheme will deliver the following key benefits:

- 138 affordable homes (London Affordable Rent or another low-cost rented tenure to be confirmed), including 22 self-contained supported housing units for care leavers, secured through the Section 106 Agreement;
- Significant landscape and public realm improvements, including urban greening and biodiversity net gain;

- A community garden for residents and the surrounding community;
- Formal and informal play space, representing a substantial improvement on the current baseline, where no play facilities exist.

3.10 The Ministry of Housing, Communities & Local Government Guidance on Compulsory Purchase Process, published in January 2025, advises that in deciding whether or not to confirm a CPO, the Secretary of State can be expected to consider factors including the following:

- i. Whether the purpose for which the land is being acquired fits in with the adopted planning framework for the area, including, any non-statutory planning guidance where this has been consulted upon and is intended in due course to be incorporated into the development plan.
- ii. The extent to which the proposed purpose of acquisition will contribute to the achievement of the promotion or improvement of the economic, social or environmental wellbeing of the area.
- iii. The potential financial viability of the scheme for which the land is being acquired; and
- iv. Whether the purpose for which the acquiring authority is proposing to acquire the land could be achieved by any other means.

3.11 In relation to (i) above, planning policy alignment, the opportunity and need to regenerate the area has been recognised consistently by the Council and its strategic partners. The London Borough of Havering's 12 Estate programme is a major regeneration initiative in which the Chippenham Road area has been identified as a key site for regeneration and provision of new homes. It's been referenced in the London Borough of Havering Housing Strategy and related planning documents including the Supported Housing Strategy (2022-2025) and the Housing and Regeneration Scheme (Jan 2018) which references the broader Local Plan and Housing Strategy (2014) as its foundation. Further details are set out in the Draft Statement of Reasons attached at Appendix D.

3.12 In relation to (ii) above, the use of CPO powers to facilitate the regeneration and delivery of new homes (including affordable homes) on the land shown on the CPO Map of the Order Land at Appendix B will contribute towards the Council's promotion of sustainable development with the following well-being benefits:

a) Economic well-being of the area

- i. New jobs will be created during the construction phase of the housing developments and there will also be opportunities for the local supply chain to benefit.
- ii. The new housing will bring new residents to the Borough which will result in additional consumer spend in the local economy enabling local businesses to grow and create new job opportunities.
- iii. Enabling the implementation of the infrastructure improvements, inclusive of public amenity.

b) Social well-being of the area

- i. New affordable homes will be provided for the local workforce, especially lower wage earners.
- ii. The provision of new high quality, well designed homes with good daylight levels, good ventilation and the provision of open space will have positive health and well-being impacts for residents.
- iii. Additional Council Tax revenue will be realised by the Council enabling increased spend on local services.
- iv. There will be construction training and apprenticeship opportunities for local people.
- v. Achievement of the wider regeneration objectives including amenity and infrastructure improvements.
- vi. New highway, public realm and landscape works.

c) Environmental well-being of the area

- i. The redevelopment of the land will improve the visual amenity of the area replacing low houses with high quality new housing developments and public realm.
- ii. The new housing will be constructed to high-energy efficiency standards resulting in reductions in energy consumption and carbon emissions.
- iii. There will be high quality open space and amenity space within the housing developments.

3.13 In relation to the viability of the scheme, Chippenham Road is brought forward in accordance with the Council's regeneration objectives, including the delivery of a comprehensive and sustainable development, providing much needed housing, including affordable housing, and social infrastructure, funded predominantly from the Housing Revenue Account (HRA) with an additional GLA bid pending and support from delivery partners .

3.14 Consideration of whether the purpose of acquiring the land could reasonably be achieved by other means such as continued negotiation or alternative delivery routes, addressed in Section 7 (Other Options Considered) of this report.

4. Loss of Existing Residential Units

4.1 London Plan Policy H8 addresses the loss of existing housing in estate redevelopment schemes. It requires that any demolition of existing homes is replaced with housing at equivalent or higher densities, ensuring at least the same overall floorspace, and encourages an uplift in affordable housing wherever possible. The policy requires that:

- Alternative options to demolition must be considered, weighing social and environmental impacts;

- Any demolition of affordable housing must be matched by at least equivalent affordable housing floorspace;
- Redevelopment proposals should normally follow the Viability Tested Route and seek to deliver an increase in affordable housing beyond replacement floorspace.

4.2 The Design and Access Statement for the planning applications reviewed the 32 existing homes on the site (24 flats and 8 houses) and considered options for retention. Retention was ultimately discounted in favour of comprehensive redevelopment, given the opportunity to deliver a greater number of high-quality, energy-efficient homes.

4.3 To date, the Council has:

- Reacquired 10 residential leasehold interests;
- Decanted 20 Council tenants under the Local Lettings Plan;
- Two residential properties remain unacquired, one vacant and one occupied.

4.4 The approved scheme will deliver 138 new homes, including 22 self-contained supported housing units. All new homes will meet Nationally Described Space Standards (NDSS), comply with current Building Regulations, and deliver high thermal performance. This represents a significant net increase in both the number and quality of homes, and the total affordable housing floorspace exceeds that being replaced. The scheme is therefore not required to follow the Viability Tested Route.

4.5 While retaining the existing housing could have avoided emissions from demolition, this is outweighed by the social and environmental benefits of the scheme, including improved housing quality, accessibility, and energy efficiency. London Plan Policy H8 is therefore considered satisfied.

4.6 Given that the scheme delivers much-needed affordable housing and supports the regeneration of Chippenham Road as part of the wider masterplan, there is a clear public interest case for securing the remaining property interests to enable redevelopment. The Council considers the appropriate powers to be those under sections 226(1)(a) and 226(1A) of the Town and Country Planning Act 1990, which allow acquisition to facilitate development, redevelopment, or improvement of land where it will promote the economic, social, and environmental wellbeing of the area. The benefits extend beyond the CPO land itself to the wider community.

5. Acquisition of Remaining Interests and Human Rights Considerations

5.1 The Council (LBH) owns the freehold of the land within the Site. However, three leasehold interests remain to be acquired in order to achieve full vacant possession and enable the redevelopment to proceed.

5.2 Since 2019, the Council has actively sought to acquire all property interests within the Site by private treaty, supported by specialist property advisers. Significant progress has been made. Out of the 32 dwellings originally on the Site, 30 are now

under Council control. The Council owns the freehold of the entire Site, with only two outstanding residential interests. One long-leasehold property held on a buy-to-let basis and one dwelling occupied under an assured tenancy. The other remaining property is the Alderman Public House, which is subject to a head-lease to Stonegate Pub Company Limited and a sub-lease to Cubitt Taverns Limited. Terms have been agreed with Cubitt Taverns Limited for voluntary acquisition, and agreement has yet to be reached with the parties holding the head-lease interest.

5.3 The Council has engaged in negotiations with all remaining owners and occupiers, offering to reimburse reasonable professional fees and making offers to acquire by agreement. Despite these efforts, it has not been possible to reach a private treaty settlement for the final interests. The Council will continue to pursue negotiated acquisition in parallel with the CPO process, in line with government guidance that compulsory purchase should be a measure of last resort.

5.4 The Ministry of Housing, Communities & Local Government's Guidance (January 2025) confirms that compulsory purchase orders should only be made where there is a compelling case in the public interest and that reasonable steps to acquire land by agreement must first be demonstrated. The Council is satisfied that both requirements are met.

5.5 The Human Rights Act 1998 incorporates the European Convention on Human Rights into domestic law. In making and seeking to confirm a CPO, the Council must ensure that any interference with the rights of affected parties is lawful, necessary, and proportionate. The relevant Articles are:

- **Article 1 of the First Protocol (A1P1)** – peaceful enjoyment of possessions. Compulsory acquisition interferes with this right, but such interference is justified in the public interest and subject to lawful compensation;
- **Article 6** – the right to a fair hearing. Affected parties have the opportunity to make representations, participate in any public inquiry, and challenge decisions in the High Court;
- **Article 8** – the right to respect for private and family life. Any interference with this right is considered necessary and proportionate to achieve the legitimate public aim of delivering the scheme.

5.6 The Council has carefully balanced individual property rights with the wider public interest. The demonstrable public benefits of the scheme clearly outweigh the limited private loss, particularly given the availability of statutory compensation and the rehousing support offered under the Council's adopted Local Lettings Policy.

5.7 The Council is therefore satisfied that the compulsory acquisition of the Order Land is necessary, proportionate, and justified, and that it will remove all material impediments to delivering the scheme in the public interest. Officers will continue to pursue acquisition by agreement alongside the CPO process.

5.8 Further details are set out in the Schedule of Interests at Appendix A. While the Schedule of Interests currently records the freehold of 70 Chippenham Road as being held by L&Q Group, this is factually incorrect. The Council completed the

purchase of the freehold earlier in the summer 2025. The Land Registry entry has yet to be formally updated, resulting in a short administrative delay in reflecting the correct ownership.

REASONS AND OPTIONS

6. Reasons for the decision:

6.1 The full legal and evidential case for using compulsory purchase powers is set out in the Draft Statement of Reasons (Appendix D). Cabinet is asked to note, in headline terms, that:

- 6.1.1 **Statutory power** – The Council’s powers under section 226(1)(a) Town and Country Planning Act 1990 are engaged, and the well-being test in section 226(1A) (economic, social and environmental) is met.
- 6.1.2 **Public benefit** – The Scheme delivers 138 new affordable homes, biodiversity improvements, and a community garden, fully aligned with the Borough Local Plan 2021 and the London Plan.
- 6.1.3 **Reasonable steps** – Negotiations since 2019 have secured voluntary acquisition of the great majority of interests; however, two residential and related commercial interests remain outstanding and cannot be guaranteed by agreement within a reasonable timescale.
- 6.1.4 **Funding certainty** – Capital provision exists within the approved HRA programme, with additional GLA funding recently confirmed. Delivery partners are in place and the project is viable.
- 6.1.5 **Proportionality & safeguards** – Interference with A1P1, Article 6 and Article 8 rights is necessary and proportionate given the statutory compensation framework and the opportunity for objections to be heard at a public inquiry.

7. Other options considered:

7.1 Refurbishment and extension options

Strategic option

Reason for rejection

1 — Refurbish ‘as is’

Internal upgrades within existing envelope; fails the Nationally Described Space Standard (NDSS)space standards, provides no step-free access, minimal insulation improvement, maintains low density overall fails to deliver the required social and environmental outcomes.

2 — Refurbish + extensions

Rear and side extensions to enlarge units; only partially meets NDSS, still no step-free access, limited energy-efficiency gain; highly disruptive with poor cost–benefit.

3 — Relocate core + extension

Strip-back, relocate stair/lift core, add additional floors; meets NDSS for most flats but lift reach remains restricted; structurally complex and costlier than new-build, while density and unit mix still fall short of policy targets.

7.2 In addition to the technical refurbishment options, three strategic land-assembly approaches were evaluated:

Strategic option

Reason for rejection

Do nothing / piecemeal redevelopment

Site would remain under-occupied; no step-free access; fails to address overcrowding or meet corporate housing targets.

Voluntary acquisition only

Despite 18 months of negotiations, no certainty of securing the final interests in a reasonable timescale. Risk of blight and cost escalation.

Smaller development footprint

Requires major redesign, reduces affordable-home output, undermines business case and estate-ballot mandate.

7.3 If a decision to support the CPO is not taken, land could be assembled only through voluntary agreement. Without compulsory purchase powers there is a significant risk that the comprehensive regeneration of Chippenham Road would be delayed or fail altogether, leaving the Council unable to deliver 138 new affordable homes and associated public-realm improvements.

7.4 Proceeding with a resolution to exercise CPO powers, while continuing to pursue negotiated acquisitions, provides the only realistic route to timely site assembly, delivery certainty, and alignment with the Council's Local Plan and housing strategy objectives.

IMPLICATIONS AND RISKS

8. Financial implications and risks:

8.1 The Council is satisfied that funding is, or will become, available to promote the CPO, compensate remaining landowners, and meet the other project costs necessary to deliver the development. The Council currently has funds available in the HRA Acquisitions budget (C30620).

8.2 The schedule of remaining property interests to acquire along with the estimated cost is set out in the Exempt Appendix F.

8.3 Risks:

8.3.1 Disturbance and compensation costs: risk of escalation if estimates provided by consultant prove to be inadequate. The residual risk would be managed from the 12 estates site assembly budget.

8.3.2 Failure to progress the development of the site: after concluding the CPO could require the Council to give the original owners first option to acquire back their properties. Such an outcome would likely see the Council absorb any compensation and disturbance payments as sunk costs to be written off. This, however, is unlikely given the status of the development and confirmation of grant funding.

8.3.3 Delays: with GLA grant funding in place, this site is ready for development. Delays to the CPO / private treaty negotiations will add significant costs to the redevelopment of the site arising from construction inflation and team mobilisation

9. Legal implications and risks:

9.1 Section 226(1)(a) of the Town and Country Planning Act 1990 (as amended by the Planning and Compulsory Purchase Act 2004), provides that a local authority shall, on being authorised to do so by the Secretary of State, have the power to acquire compulsorily any land in their area if they are satisfied that the acquisition will facilitate the carrying out of development, redevelopment or improvement and is necessary to the achieve proper planning on or in relation to the land.

9.2 The power set out in s.226(1)(a) is subject to the limitation set out in s.226(1A) which provides that the exercise of the power under that subsection must not be exercised unless the authority thinks that the development, redevelopment, etc. "is likely to contribute to the achievement of one or more of the following objectives:

- i. The promotion or improvement of the economic well-being of their area;
- ii. The promotion or improvement of the social well-being of their area;
- iii. The promotion or improvement of the environmental well-being of their area."

9.3 With regard to the objectives set out, officers set out in this report that an intended purpose of the Scheme is to secure development to enable the delivery of homes, particularly the delivery of affordable homes. As such the subject scheme, would, as a matter of principle, be capable of fulfilling all three of the specified objects, and in particular the "promotion or improvement of social well-being". This is further dealt with at Section 3 of this report and in the Statement of Reasons attached at Appendix D.

- 9.4 Paragraph 1.2 of the CPO Guidance acknowledges that compulsory purchase powers are an important tool to use as a means of assembling the land needed to help deliver social, environmental and economic change. Used properly, they can contribute towards effective and efficient regeneration, essential infrastructure, the revitalisation of communities, and the promotion of business, leading to improvements in quality of life.
- 9.5 The CPO Guidance states 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 to make a compulsory purchase order. The reasonable steps to be taken will depend on the particular circumstances of each case.
- 9.6 Paragraph 2.8 states that compulsory purchase is intended as a last resort to secure the assembly of all the land needed for the implementation of projects. However, an acquiring authority does not need to wait for negotiations with affected parties to break down or for the affected parties to begin to engage with them before starting the compulsory purchase process in parallel with negotiations. Delaying the start of the compulsory purchase process can result in valuable time in progressing a project being lost. Therefore, depending on when the land and rights are required, it may often be sensible, given the amount of time required to complete the compulsory purchase process, for the acquiring authority to plan a compulsory purchase timetable as a contingency measure and initiate formal procedures.
- 9.7 This report sets out that the Council has been engaging with affected parties and will continue to do so in line with the provisions of the CPO Guidance.
- 9.8 Consideration has been given, in this report and in the Statement of Reasons attached at Appendix D, to the provisions of the Human Rights Act 1998 including Article 8 (respect for private life and family life and home) and Article 1 of the First Protocol (right to peaceful enjoyment of possessions) It strikes a fair balance between public interest in the regeneration of the land and interference with private rights. By way of conclusion, s.226 of the Town and Country Planning Act 1990 represents a basis available to the Council to acquire the site. The Council needs to be satisfied that the statutory tests and policy tests set out in the Guidance for the making and confirmation of CPO pursuant to that statutory power are met, including that all occupier negotiations have been undertaken. This has been addressed in this report and Appendix D
- 9.9 There are a number of normal project risks that would be associated with any major regeneration project of this nature. These include:
- 9.9.1 Title – Extensive legal due diligence has been undertaken to ensure there will be clean title on the land to be used for redevelopment/public realm works and this, together with a CPO will ensure this is in place in order to enable a start on site.
- 9.9.2 Land – If the necessary land and rights cannot be assembled via CPO there is a risk that the Chippenham Road scheme won't be able to proceed.

9.9.3 Finally, there is always a risk of third-party legal challenge to the decision-making process by the Council and also to any decision granting the CPO by the Secretary of State. The Council has been guided by its in-house lawyers and instructed counsel in order to help minimise the risk of legal challenge.

10. Human Resources implications and risks:

10.1 The making of a Compulsory Purchase Order (CPO) is primarily a legal and governance process and will be managed by existing officers within the Regeneration Directorate, supported by colleagues in Legal Services, Property, Finance, and Housing. No new permanent posts are required. Any additional capacity such as external valuers, surveyors, or counsel will be funded from the approved capital budget and commissioned through the Council's established framework contracts.

10.2 Key HR considerations:

HR Risk	Likelihood	Impact	Mitigation
Competing programme pressures on key officers	Medium	Medium	Cross-cover within the team; scheduled resource reviews; use of framework consultants as needed
Need for specialist skills (valuation / CPO advocacy)	Low	High	External RICS valuers and CPO counsel appointed under call-off contracts
Staff safety during any site inspections	Low	Medium	Site-specific risk assessments, PPE, and compliance with corporate H&S policy

10.3 There are no TUPE transfers, redundancies or changes to terms and conditions anticipated. The programme therefore carries minimal HR risk and can be accommodated within existing corporate staffing arrangements.

11. Equalities Implications and Risks

11.1 A full Equalities Impact Assessment (EqIA) confirms that the scheme will have a net positive impact for residents with protected characteristics. It will deliver significantly more accessible and affordable homes, provide specialist 22 self-contained supported housing accommodation, and reflects that the decanting of residents has already been completed in line with the Local Lettings Plan. Short-term construction impacts will be mitigated, and equality outcomes will be monitored through resident liaison and service reviews.

11.2 A full EqIA has been completed and is attached at Appendix C. Cabinet must have due regard to the Public Sector Equality Duty (Equality Act 2010) when considering whether to authorise the CPO.

Protected Group / Issue	Potential Impact	Mitigation / Enhancement	Residual Risk
Decant of existing residents (age, disability, pregnancy/maternity)	Temporary disruption and stress during relocation (now completed)	Local Lettings Plan prioritised affected tenants; tailored support (packing, transport); phased moves to minimise upheaval	Low
Construction activity (respiratory conditions, older people)	Dust, noise, restricted access	Construction Environmental Management Plan; real-time air quality monitoring; “quiet hours” and clear resident liaison	Low
Accessibility of new homes (disabled people)	Positive – wheelchair units and all blocks step free	Compliance with M4(3) and M4(2); early engagement with prospective tenants	Positive
22 self-contained supported housing accommodation (socio-economic)	Positive – 22 self-contained units	Ongoing wrap-around support for vulnerable residents.	Positive

11.3 The EqIA concludes that the scheme will have an overall net positive impact on residents with protected characteristics, particularly through:

- Increased supply of accessible and genuinely affordable homes.
- Support for residents during relocation, now successfully completed.
- Measures to reduce short-term construction impacts.
- Provision of 22 self-contained supported housing units.

11.4 Equality was also part of the considerations informing the scheme design:

- The design includes step-free access and wheelchair-compliant units in response to disabled residents’ needs
- The decant and rehousing process followed the Local Lettings Plan to prioritise vulnerable groups, including families and less able residents.
- Engagement included targeted outreach to affected residents, including disabled tenants and ethnic minority households.
- Access to St George’s Church and local facilities will be maintained throughout, meeting faith and cultural considerations.

11.5 Equality impacts will continue to be monitored through resident liaison, complaints monitoring, and service reviews during and after the redevelopment. Feedback from protected groups will inform any adjustments to rehousing or support processes.

11.6 Residual equality risk is assessed as low, and the scheme is consistent with the Council's duty to advance equality of opportunity and foster good relations. Approving the CPO will help address overcrowding, fuel poverty, and accessibility barriers currently experienced on the estate.

12. Health and Wellbeing implications and Risks

12.1 The Council is committed to protecting and promoting the health and well-being of its residents. There are health and wellbeing implications associated with making Compulsory Purchase Orders (CPOs) of residential and business units in the Chippenham Road area. For those individuals whose property is subject to a CPO, these implications may be negative, and include:

- Stress, uncertainty, and loss of autonomy
- Loss of existing local social connections and support through forced relocation.

As outlined in the report, key to mitigating these harms include continued dialogue with affected parties to strive wherever possible to reach agreeable terms to secure full vacant possession, and to continue to offer assistance to occupiers with relocation options, as far as this is possible.

12.2 The making of CPOs has been deemed necessary as a last resort to enable delivery of the Chippenham Road regeneration programme. In recommending the making of CPOs, it is implied that the public benefits (including health and wellbeing benefits) associated with the proposed regeneration will clearly outweigh the negative implications for those affected by the making of CPOs. Given the small number of properties not yet acquired by LBH that would potentially be subject to a CPO, the cumulative negative impacts are likely to be small. Conversely, the health and wellbeing benefits associated with the realisation of the Chippenham Road development are likely to be significant, delivering improvements in the quality and volume of housing provision and enhanced public realm, as well as addressing unwanted antisocial behaviours that have been associated with the vacant properties in the area. As such, the health and wellbeing benefits are anticipated to greatly outweigh any negative impacts arising either as a result of making of CPOs or directly from the development either in the short or longer term.

13.ENVIRONMENTAL AND CLIMATE CHANGE IMPLICATIONS AND RISKS

The making of a Compulsory Purchase Order (CPO) is a land assembly and governance process and does not in itself give rise to any direct environmental or climate change impacts.

Environmental and sustainability considerations, including energy performance, biodiversity, and climate resilience, have already been addressed through the planning process for the approved scheme. Any construction works arising from the scheme will be carried out in accordance with the approved planning conditions, the Construction Environmental Management Plan (CEMP), and the Council's environmental policies.

Residual environmental or climate risks are therefore low and will be managed through the delivery stage rather than the CPO process.

BACKGROUND PAPERS

Report to Strategic Planning Committee – 27 February 2025 – “Chippenham Road Redevelopment”
(Full planning application reference P1150.24 and associated prior approval F0003.23 and P1274.23)

Cabinet Report – 13 February 2019 – “HRA Estate Regeneration Programme: Update and Delivery Strategy”
(Approved inclusion of Chippenham Road within the wider Harold Hill regeneration area and delegated authority for CPOs as required.)

Cabinet Report – 8 March 2023 – “12 Estates Regeneration Programme – Phase 2 Schemes”
(Approved progression of Chippenham Road as a 100% affordable scheme.)

Appendices:

Appendix A – Schedule of Interests

Appendix B – Plans identifying location and extent of interests subject of the proposed CPO

Appendix C – Equalities Impact Assessment

Appendix D – Statement of Reasons

Appendix E – Community Engagement

Appendix F – Financial Implications (Exempt).