

TOWN AND COUNTRY PLANNING ACT 1990

**THE LOCAL GOVERNMENT
(MISCELLANEOUS PROVISIONS) ACT 1976**

and

THE ACQUISITION OF LAND ACT 1981

**THE LONDON BOROUGH OF CROYDON (REGINA ROAD) COMPULSORY
PURCHASE ORDER 2026**

STATEMENT OF REASONS

2 April 2026

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1 Introduction

- 1.1 The London Borough of Croydon (the '**Council**'), of Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 1EA has made *The London Borough of Croydon (Regina Road) Compulsory Purchase Order 2026* (the '**Order**') (**Document A1**) pursuant to section 226 (1)(a) of the Town & Country Planning Act 1990 (the '**1990 Act**') (**Document D1**).
- 1.2 The Executive Mayor approved the making of the Order, under the Executive Mayor's Scheme of Delegation on 12 March 2026 (**Document F1**). This decision was made following a number of previous decisions by the Council's Cabinet in respect of the proposed redevelopment of the Regina Road Estate (the '**Estate**').
- 1.3 This is the Statement of Reasons of the Council in support of the Order. It has been prepared in accordance with the "Guidance on Compulsory Purchase Process" issued by the Ministry of Housing, Communities and Local Government on 29 October 2015 (as updated in July 2019 and October 2024) ('the **CPO Guidance**') (**Document B1**). It sets out the reasons why the powers of compulsory purchase contained in the Order are considered necessary and confirms the basis on which the Council believes there to be a compelling case in the public interest for the making of the Order.
- 1.4 The Order has been made to enable the Council to deliver the redevelopment of the Estate for up to 340 new residential units, a pre-school facility, a community use facility and a flexible games area along with associated public realm, landscaping, refuse/recycling and car and cycle parking facilities (the '**Scheme**').
- 1.5 The redevelopment of the Estate is a key priority for the Council, aligning with its commitment to deliver quantitative and qualitative improvements in local housing and develop a more responsive and effective Council housing service. The Council seeks to deliver new homes that are safe, well-designed, in keeping with the local area and supportive of the Council's strategic goals and priorities. The necessity for the redevelopment of the Estate and regeneration in the Borough more generally is also outlined in both the Council's Local Plan and the London Plan.
- 1.6 The Scheme will bring an assortment of other benefits, as set out within this Statement of Reasons.
- 1.7 The implementation of the Scheme is being led by the Council, and is being funded from several different sources, with:
 - 1.7.1 £52.25m coming from the Greater London Authority (GLA) affordable housing grant funding awarded to the Council for the delivery of the Scheme on 31st March 2025;
 - 1.7.2 £1.258m coming from the Department for Levelling Up, Housing and Communities, now the Ministry of Housing, Communities and Local Government granted to the Council on 10th September 2024;
 - 1.7.3 The remainder of the Scheme will be funded by the Council and the current project budget has been estimated at £171m The Council is funding the Scheme through the Housing Revenue Account and debt funding from the Public Works Loans Board.
- 1.8 As set out in this Statement of Reasons, the Council is confident that the Order will improve the social, economic and environmental well-being of the area surrounding

Regina Road and the Council's wider area, and that there is a compelling case in the public interest for the making of the Order.

2 Description of the Order Land

- 2.1 The land subject to the Order (the '**Order Land**') consists of land both to the north and south of Regina Road in South Norwood, Croydon (the '**Borough**'), as well as part of the Regina Road highway. The Order Land is bounded on its southern and western sides by Sunny Bank, and to the north-west by Manor Road. To the north is the rear of neighbouring properties in Bradshaw Close and Camile Close.
- 2.2 The Order Land consists of:
- 2.2.1 191 dwellings within eight blocks (including one eleven-storey tower block; two twelve-storey tower blocks constructed in the 1960s, each containing 44 flats; five low-rise blocks constructed between the 1960s and 2011 containing 56 flats; and three three-bedroom houses);
 - 2.2.2 a pre-school;
 - 2.2.3 parts of Regina Road and Sunny Bank adopted highways;
 - 2.2.4 estate land; and
 - 2.2.5 land associated with the former garages, now gated-off hardstanding.
- 2.3 Of the 191 residential dwellings, 166 are provided for social rent and 25 are privately owned. Of these dwellings, 99 are currently vacant, with the remaining occupied properties being 75 social rent and 17 are privately owned.
- 2.4 The Order Land is registered with the Land Registry under freehold title numbers SGL209762, SY75687, SGL790846, SGL613937, SGL568829 and SGL331287 (**Documents I1 to I6**). Most of the freehold land within the Order Land is owned by the Council, though some of the freehold land is owned by third parties. There are also several registered leasehold interests across the Order Land.
- 2.5 There is an existing substation on the Estate that will be relocated and upgraded. The current strategy is for the plant room in Plot 18 (new Block A) to deal with the energy demands in respect of hot water and heating of both phases of the estate redevelopment. The Council has been liaising with UK Power Network ('**UKPN**') in respect of the development proposals and UKPN has provided detailed comments on design and location requirements and the Council are working with them to ensure that their requirements are met where possible throughout the design development post planning.
- 2.6 The Order Land is shown edged red, with the relevant Plots coloured pink on the map accompanying the Order (**Document A2**).
- 2.7 The schedule to the Order (the '**Schedule**') lists the owners, tenants and occupiers of the Order Land. In addition, it lists all those other parties that have been identified as having a qualifying interest in the Order Land as defined by section 12(2) of the Acquisition of Land Act 1981 (**Document D2**), including neighbouring owners with the benefit of rights and interests over the Order Land.
- 2.8 The Schedule has been based on information gathered through Estate inspections and enquiries, responses to notices issued under section 16 of the Local

Government (Miscellaneous Provisions) Act 1976 (**Document D3**) and inspection of HM Land Registry documents.

3 Need for the CPO

General housing demand and challenges

- 3.1 Croydon is a growing borough and the second largest borough in London in terms of population. Croydon is home to 396,837 people and this is expected to increase to just under 500,000 by 2050. The South Norwood ward, where the Estate is, has relatively high levels of deprivation, with most overall deprivation scores in the second and third deciles statistics (amongst the 20% and 30% most deprived neighbourhoods in England, respectively). The ward tends to see the most deprivation in terms of 'barriers to housing and services' ranking amongst the 30% most deprived neighbourhoods in the country. There is also very high deprivation in terms of 'living environment'.
- 3.2 Against this backdrop, there is a need for over 41,580 new homes in Croydon by 2040. Evidence indicates that almost all of these would have to be built as affordable homes for residents on lower incomes to meet the area's needs, and of those new affordable dwellings approximately 40% of these need to be a larger size to cater for anticipated demographic changes.

The Estate – need for redevelopment

- 3.3 Due to the poor condition of the three tower blocks within the Estate, major refurbishment/redevelopment works are needed if those blocks are to remain in use long-term. There are 99 (91 x social rent and 8 x private leasehold ownership) dwellings which are currently vacant and, due to the current poor condition of the tower blocks, these cannot currently be used as part of the Council's housing supply.
- 3.4 The Estate was developed as social housing by the Borough in the mid-1960s. It includes one eleven-storey tower block and two twelve-storey tower blocks built in the 1960s using the Wates Large Panel System ('LPS'), each containing 44 flats. The wider estate contains five low-rise blocks constructed between the 1960s and 2011, providing 56 flats in total, together with three three-bedroom houses.
- 3.5 The three tower blocks were retrofitted with insulated cladding c.1999 as part of a refurbishment project to improve living conditions. However, the flats in the tower blocks – particularly in numbers 1-87 (Plot 1 of the Order Land) – have suffered in recent years from a variety of issues including water penetration, condensation and mould that have proved difficult to rectify.
- 3.6 Critically, since July 2023, 30 cases of mould within the Estate have been reported to the Council. Six of these cases were Category 1 matters in accordance with the Hazard Rating System. The Hazard Rating System is used to assess hazards and their severity, with Category 1 hazards being the most serious and requiring immediate action.
- 3.7 Furthermore, the tower blocks and surrounding areas have experienced a significant level of anti-social behaviour; examples including the playground being set alight, thefts of boilers and copper piping in the block of 89-123 (Plot 4 of the Order Land), ongoing fly tipping on the Estate and reports of unknown persons trying to gain access into the blocks to loiter and a recent break in to a void unit in Sunny Bank.

- 3.8 In response to these concerns, the Council launched its Residents Charter (**Document B2**), its Housing Transformation Programme (**Document B3**) and Housing Strategy (**Document B4**). The documents set out the Council's commitments to improve housing services and meet the people's needs across the Borough.

The Resident's Ballot

- 3.9 On 16 November 2022¹, approval was obtained for the Council to start consulting with tenants on housing management matters, including the options to refurbish or demolish and redevelop the Estate.
- 3.10 A statutory consultation² was then undertaken with residents on proposals to refurbish or demolish and redevelop the three tower blocks and certain other properties within the Estate over the period 13 December 2022 to 26 January 2023, as authorised by the Council's Cabinet on 16 November 2022 (**Document E1**). The outcome of the statutory consultation showed that there was support for demolition and redevelopment of the Estate (**Document A3**).
- 3.11 Cabinet subsequently agreed on 22 March 2023³ (**Document E2**) based on the outcome of the statutory consultations, that a Landlord Offer be put to a Ballot of residents eligible to vote under the rules of the GLA. The Landlord Offer proposed the demolition of the three aging towers and other blocks on the Estate as the Council's preferred way forward for regenerating the area.
- 3.12 The Landlord Offer includes the following commitments:

Tenant Offer

- 3.12.1 Aims to decant as many existing residents as possible in "One Move".
- 3.12.2 Three offers of accommodation.
- 3.12.3 Households in temporary accommodation on licence to be converted to secure tenancies.
- 3.12.4 Statutory Home loss payment currently set at £8,100.
- 3.12.5 Disturbance compensation.
- 3.12.6 Help with removals.
- 3.12.7 Compensation available to Tenants for home improvements.
- 3.12.8 Tackle overcrowding and re-assessing households' housing needs.
- 3.12.9 Extra Care or Sheltered housing available.

¹ Regina Road Estate, Norwood – Key Decision: 5122 EM (**Document E1**)

² This was in accordance with Section 105 of the Housing Act 1985 and, to the extent relevant, under section 137 of the Housing Act 1996.

³ Regina Road Estate, Norwood – Outcome of Statutory Consultation and arrangements for a Ballot of residents on the Landlord Offer, Key Decision: 8622 EM

- 3.12.10 Right to return to a new home in Regina Road if tenant has left as a result of the redevelopment after 16 November 2022.
- 3.12.11 Right to choose either a secure tenancy or assured tenancy near the area of Regina Road or to another part of the Borough.
- 3.12.12 Downsizing to a smaller home if agreed.
- 3.12.13 Dedicated support for tenants.

Leaseholder and Freeholder Offer

- 3.12.14 Dedicated support for Leaseholder and Freeholders.
 - 3.12.15 Market Valuation plus 10% home loss payment.
 - 3.12.16 Valuation will take into account the assumption of an acceptable fire rating and good external repair (based on EWS1 with an A2 risk rating).
 - 3.12.17 Home loss at 10% of the value of the property to a maximum of £81,000.
 - 3.12.18 Disturbance compensation.
 - 3.12.19 Legal costs, stamp duty and surveying fees covered by the Council.
 - 3.12.20 Basic Loss Payments for Non-Resident Leaseholders – 7.5% of market value, to a maximum of £75,000.
- 3.13 The Landlord Offer was approved by the Council by the Executive Mayor in Cabinet on 26 July 2023⁴ (**Document E3**) and was put to Ballot, in accordance with GLA funding guidelines (**Document A4**), between 26 April and 22 May 2023. 81.7% of eligible voters voted in total, and 88.1% of those voters voted in favour of the Council's Landlord Offer to redevelop their homes.
- 3.14 As detailed, of the residents who responded to the Ballot, 88.1% voted in favour of the proposed development which demonstrates the significant support and need for the redevelopment.

4 Purpose of the Order, Enabling Powers & Related Provisions

- 4.1 The Order has been made pursuant to Section 226(1)(a) of the 1990 Act (**Document D1**).
- 4.2 Section 226(1)(a) of the 1990 Act empowers an acquiring authority, on being authorised by the Secretary of State, to acquire compulsorily any land in their area if the acquiring authority thinks that the acquisition will facilitate the carrying out of the development, redevelopment, or improvement on or in relation to that land.
- 4.3 The power at s.226(1)(a) is subject to s.226(1A) of the 1990 Act which requires the Council to be satisfied that the development, redevelopment or improvement is likely to contribute to the promotion or improvement of the economic, social or environmental well-being of their area.

⁴ Regina Road Project – Outcome of Ballot and Next Steps – Key Decision: 3823EM

- 4.4 The Council is satisfied that the implementation of the Scheme on the Order Land satisfies the requirements set out at s.226(1) and (1A) of the 1990 Act, as further set out in this Statement of Reasons.

5 The Scheme

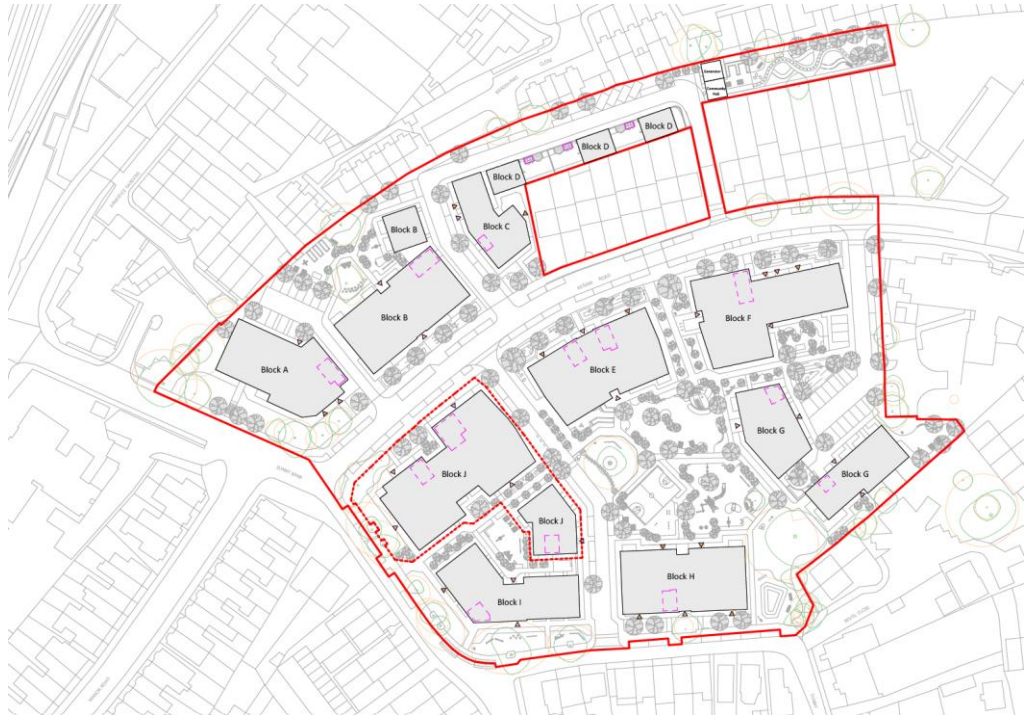
- 5.1 The Scheme is the residential-led redevelopment of the Estate. The Council engaged in the pre-application planning process (reference: 23/00397/PRE) and submitted its outline planning application (reference: 25/02016/OUT) on 17 June 2025 (the '**Planning Application**'). Permission was granted on 12 January 2026 pursuant to the Planning Application for the following:

- 5.1.1 redevelopment of the housing estate of up to 340 residential units;
- 5.1.2 a pre-school facility;
- 5.1.3 community space and a flexible games area;
- 5.1.4 along with associated public realm, landscaping, refuse/recycling and car and cycle parking facilities.

(the '**Planning Permission**') (**Document F2**)

- 5.2 It is intended to deliver the Scheme through implementation of the Planning Permission. The Scheme will therefore involve the demolition of the 191 dwellings within 8 buildings (including 3 tower blocks) located within the Order Land. The demolition of the existing properties and buildings within the Order Land is specifically required to deliver the Scheme.
- 5.3 The Scheme is phased into 2 periods of construction and delivery, with the first phase anticipated to deliver 225 new affordable homes (with 215 being social rented homes and 10 as shared equity homes), community space, a pre-school facility and a multi-use games area in the north and southeast of the Estate ('**Phase 1**'). The second phase proposes up to 115 open market dwellings in the southwest of the Estate ('**Phase 2**') (**Document A5**). The Planning Permission grants full permission for Phase 1 and outline permission for Phase 2, with all matters reserved.
- 5.4 The number of units for the Scheme was reduced from 380 (as initially envisaged) to 340 based on the outcome of extensive feasibility studies, optioneering review and testing against National Design Guidelines, alongside rigorous pre-application meetings with the planning and design officers at the Council. There were many factors that ultimately led to arriving at 340 units, including ensuring overall exemplar quality of residential amenity and excellent public realm and open space. At all iterative stages of the design process, the building placement and height was tested for compliance against relevant planning policies, and assessed for technical outcomes, including microclimate and daylight and sunlight matters. Ultimately all these factors led to an arrival at an optimum number of residential units in an environment that ensured residential quality.
- 5.5 In terms of delivery, as matters currently stand, Phase 1 of the Scheme is fully funded and this is detailed further at Section 10 of this Statement of Reasons. The funding case for Phase 2 remains under development. The Council has had a number of initial Cabinet decisions in relation to the comprehensive redevelopment of the whole Scheme, with the initial funding allocation applying only to Phase 1. In order to deliver Phase 1, all existing buildings on the Estate must be purchased and demolished to facilitate that delivery (including those located on the Phase 2

part of the Order Land). Phase 2 will be delivered on the remaining open space land on the Estate.



Plan showing the Scheme and proposed layout

Phase 1 (detailed)

- 5.6 Phase 1 of the development comprises 2.29 ha of the Estate. It is proposed in full detail and comprises 9 flatted blocks and 5 dwellinghouses across the north, central, eastern and southwestern parts of the Estate.
- 5.7 The northern part of Phase 1 sits to the north of Regina Road and incorporates 3 flatted blocks (A, B, C) and 5 dwellinghouses. The westernmost block (A), containing 30 homes and the proposal's energy centre, will front onto Sunny Bank on its southwest side and Regina Road on its southeast side, and in doing so defines a key corner of the Estate. The height and massing of Block A has been carefully balanced to ensure it would perform both as a suitable wayfinding element on this key corner entrance into the Estate and as a building which would continue to preserve the setting of the South Norwood Conservation Area from which it will be visible along Manor Road to the southwest.
- 5.8 Block B, containing 34 homes, will front Regina Road on its southeast side and a proposed loop road through the northern part of the Estate on its northeast side. Its longer frontage to Regina Road will be broken up through 'villa block' architectural typology, which includes a centrally inset section. Also denoted within Block B, but sitting separately from it, is a pair of semi-detached townhouses which will be positioned to the rear of the main Block B and fronting the new loop road with private rear gardens. Blocks A and B will overlook a landscaped amenity space at the rear and an adjacent car parking court.
- 5.9 Block C, an L-shape block containing 8 homes, will principally front the other side of this new loop road and would also benefit from a residential courtyard to its rear.

The narrowest part of the Estate to the northeast of Blocks A, B and C is proposed to be developed with 3 mews style houses (denoted as Block D) that will line the southern edge of the main east-west span of the proposed loop road. These houses will benefit from private side gardens.

- 5.10 The height of Block A is 6 storeys where it marks the corner of Regina Road and Sunny Bank and 5 storeys where it extends away from the corner to the northwest. Block B has a 4 storey + 1 setback storey height and utilises wraparound terraces to establish this change in mass along the building edges; this enables the building to visually transition with the lower massing of Block C to the east. The townhouses within Block B are 3 storeys in height, with the third storey occupying the pitched roof form. Block C's massing extends to 4 storeys in height at its centre and reduces to 3 storeys on its northern and eastern sides, enabling the building to interface appropriately with the low-scale 2-storey suburban housing (both proposed and existing) which it sits adjacent to. The mews houses forming Block D have a 2-storey height, with the second storey part occupying the pitched roof form.
- 5.11 The area occupying the former garages of the Estate in the northeast of the Estate, which sits to the rear of 141 – 157 Regina Road, is proposed to be utilised as a landscaped community garden. A small building housing the proposed Estate's generator will sit adjacent to the entrance to the community garden. Both elements will front onto the east side of the proposed loop road.
- 5.12 The southern part of Phase 1 sits in the central and eastern parts of the Estate to the south of Regina Road. This part of the proposal incorporates 2 blocks fronting Regina Road (E and F) containing 39 and 41 homes respectively. Similar to Block B, Block E's longer frontage to Regina Road will be broken up through 'villa block' architectural typology, which includes a centrally inset section. Block E will be one of two mixed-use blocks, containing the proposed community space at its ground floor.
- 5.13 Block F has a T-shape massing and adopts the 'villa block' architectural typology on its west side a more linear architectural language with a setback element to its east to break up the frontage. This block's east elevation will front onto a proposed access road serving a car parking court. This block will benefit from its own residential courtyard to its rear. These blocks heights will be 5 storeys + 1 setback storey for E and 4 storeys for F.
- 5.14 The other mixed-use block (Block G.1), containing 17 homes within a linear 5 storey massing, will contain the pre-school on the ground floor. It will benefit from an enclosed outdoor play area (forming part of the pre-school) which fronts onto the proposed access road and car parking court to the rear. Block G.2, containing 9 homes within a linear 4 storey massing, will sit to the south of this block. This block will also benefit from its own residential courtyard at its east side.
- 5.15 Block H, containing 24 homes, will line the southern edge of the centrally located community green, also fronting onto it. This community green will also be fronted onto by the rear of Blocks E and F to the north and east respectively, enabling the community space and pre-school elements to front directly onto this key public amenity space. Block H, along with Block E, will also front a proposed access road to their west side which is intended to create a new north-south connection between Regina Road and Sunny Bank as part of this phase. The soft landscaping would extend to an area to the east of Block H to link directly with Sunny Bank and retain a landscaped setting for a large TPO tree in the southern part of the Estate. The height of Block H will be 3 storeys + 1 setback storey and will adopt a 'villa block' architectural typology akin to that of Blocks B and E.

- 5.16 Block I, containing 20 homes, is in the southwest of the Estate, to the west of the proposed north-south access road and would establish a frontage to both sides of the bend in this part of Sunny Bank. The linear typology block has a 5-storey height in its central corner section and a reduced 3 to 4 storey massing towards its eastern and western edges. The block will benefit from a residential courtyard to its rear and will sit adjacent to a proposed public pedestrian link between the west side of Sunny Bank and the new north-south access road.

Phase 2 (outline)

- 5.17 Phase 2 will occupy the southern western corner of the Estate, flanked by Regina Road to the north, with Sunny Bank forming its western and southern boundary, with a new one way through-road forming its eastern side. Matters are reserved for the design of this phase, and a series of parameter plans have been submitted to establish maximum limits for development to ensure a degree of certainty as to the scale, layout and use of the phase ahead of the submission of full details at reserved matters stage.
- 5.18 The current proposal is for a tower (of up to 14 storeys) element in the northeastern corner of the Phase 2 Estate area, together with a perimeter block. The current unit numbers of up to 115 homes is based on the perimeter block being 6 storeys, although this is subject to change. An open area with landscaping is proposed to be provided within the centre of the Phase 2 block, where additional play space is proposed, as well as open spaces around the periphery. The layout parameter plan submitted for the Estate requires the phase to come forward in the form of two separate buildings. The open space parameter plan identifies the extent of Phase 2 which will be delivered as a landscaped buffer between buildings and the edge of the Phase 2 boundary.

6 Justification for Compulsory Purchase

- 6.1 The Council has powers under section 226 of the 1990 Act to acquire land compulsorily. These powers may be used to acquire land compulsorily if it thinks that the acquisition will facilitate the carrying out of development, redevelopment or improvement on or in relation to the land, provided that the development, redevelopment or improvement is likely to contribute to the achievement of any one or more of the following objectives:
- 6.1.1 the promotion or improvement of the economic well-being of their area;
 - 6.1.2 the promotion or improvement of the social well-being of their area;
 - 6.1.3 the promotion or improvement of the environmental well-being of their area.
- 6.2 In using its compulsory purchase powers, the Council is aware, and has taken into account, the considerations set out in paragraph 12-14 of the CPO Guidance (**Document B1**) and of 'Section 1' of the CPO Guidance which deals specifically with the application of the powers under s.226 of the 1990 Act.
- 6.3 Paragraph 12 of the CPO Guidance states that:

A compulsory purchase order should only be made where there is a compelling case in the public interest and reasonable efforts have been made by the acquiring authority to negotiate the purchase of land by agreement.

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 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. Acquiring authorities should also give consideration to the public sector equality duty.

- 6.4 In addition, paragraph 11 of the CPO Guidance sets out that acquiring authorities should look to use the most specific power available for the purpose in mind and only use a general power when a specific power is not available. The authority should have regard to any guidance relating to the use of the power and adhere to any legislative requirements relating to it. The Council is satisfied that the use of the powers contained in the legislation referred to above are the most appropriate powers available for its purposes and will facilitate the carrying out of development, redevelopment or improvement on or in relation to the Order Land and that it will contribute to the development, redevelopment or improvement of that area, thus meeting the statutory tests.
- 6.5 In accordance with the CPO Guidance, the Council has considered:
- 6.5.1 whether the purpose for which the Order Land is being acquired fits with the development plan for the area (see Section 8);
 - 6.5.2 the extent to which the Scheme will contribute to the achievement of the promotion and/or improvement of the economic, and/or social, and/or environmental well-being of the Council's area (as required by s.226 of the 1990 Act) (see Section 7);
 - 6.5.3 whether the purposes for which the proposed Order Land is to be acquired could reasonably be achieved by any other means within a reasonable timeframe (see Section 9);
 - 6.5.4 the potential financial viability of the Scheme, general funding intentions and the timing of available funding, sufficient to reassure the Secretary of State that there is a reasonable prospect that the Scheme will proceed (see Section 10); and
 - 6.5.5 any impediments to the Scheme going ahead (also see Section 11).
- 6.6 An analysis of each of these factors is set out below.

7 Benefits of the Scheme

Introduction

- 7.1 All of the Order Land is required to deliver Phase 1 of the Scheme. The Council relies on the benefits that will be realised by the delivery of Phase 1 in order to justify the compulsory acquisition powers sought. Furthermore, the completion of Phase 1 is necessary in order to facilitate to Phase 2. Should Phase 2 come forward as anticipated in due course, these would represent additional benefits of the Order. However, it is not necessary to rely on Phase 2 benefits in order to justify the powers sought.

Phase 1 Benefits

- 7.2 Phase 1 of the Scheme will deliver multiple benefits, as set out below:

- 7.2.1 *Regeneration* – The Scheme will develop a strategic Estate in an important location close to South Norwood District Centre and will contribute to local regeneration in accordance with the intentions of the emerging Estate allocation for the Regina Road Estate. The Scheme will also act as the impetus for removing existing poor-quality housing and the associated structural, fire and health and safety issues and its replacement with high quality housing, thereby ensuring an approach that aligns with preferences expressed in a public ballot of estate residents in 2023.
- 7.2.2 *Delivery of new and improved homes* – The Scheme will enable the Estate's existing residents to be rehomed in higher quality and safer dwellings. Phase 1 of the Scheme will also significantly increase the number of social rent homes along with up to 10 shared equity properties or shared ownership properties on the Estate. These will be brought forward along with the provision of market homes to be delivered under Phase 2 of the development, thus enabling the development to meaningfully contribute to delivery against Croydon's housing targets. Homes within the Scheme are designed to suit the needs of a varied and changing population by offering homes in a range of sizes and tenures, including one- to four-bedroom affordable homes (225 units, being 100% of the dwellings) in Phase 1. This would contribute to an overall total of affordable housing across both phases of the Scheme as 66.2%, which represents a net gain for Phase 1 of 59 affordable housing units (being a 35.5% increase). In addition to this net gain, the redevelopment will seek to prioritise the delivery of family homes (units with 3+ habitable rooms). The Estate currently has only 3 units with 3+ habitable rooms. Phase 1 of the redevelopment will deliver 70 units with 3+ bedrooms, representing an increase of 67. Phase 2 is anticipated to deliver additional family homes with 3+ bedrooms, with indicative plans proposing 35 such units. The Scheme is also committed to meeting relevant legislation and guidance, including complying with recommendations in Building Regulation M4 regarding accessibility, with all homes designed to be 'accessible and adaptable' (M4(2) compliant) and a minimum of 10% of homes designed to be wheelchair accessible (M4(3) compliant). All dwellings have been designed to meet legislative requirements and follow architectural best practice, including following guidance on internal space standards, layout and orientation. Larger family homes will be concentrated in ground-floor duplexes and maisonettes, and all homes will have good access to natural daylight and cross-ventilation.
- 7.2.3 *Creation and Improvement of community infrastructure* – Phase 1 of the Scheme will replace the existing pre-school premises with an improved purpose-built facility and will ensure the meanwhile relocation of the pre-school within the local area during construction. Phase 1 of the Scheme will also replace the existing sports and play facilities on the Estate, including the multi-use games area, ensuring a more diverse and inclusive array of spaces is created. The proposal for Phase 1 will establish a new community space for the benefit of local residents. The Scheme has a strong, design-led approach which includes consideration of inclusive and age-friendly design. Feedback from residents, including older adults and families with disabled children, has shaped the Scheme. This co-design process has supported delivery of spaces that are not only physically accessible but socially inclusive and welcoming. In addition, the Scheme will be compliant with Building Regulation M4, provide wheelchair accessible

and adaptable residential homes, and offer accessible routes and level or gently sloped access across the Estate. Buildings will also feature step-free access.

7.2.4 *Landscaping and urban greening* – The Estate at present is comprised of a central green space as well as various tracts of leftover green space around the estate’s edges, both of which offer little meaningful amenity. The Scheme stands to substantially improve the landscaping and public realm within the Estate, delivering more than 5,000sqm of new open space, with a new community green at its centre, alongside the planting of approximately 208 new trees to transform the public realm, the majority of which will be delivered pursuant to Phase 1. Residential courtyards for new blocks will be delivered as part of this, as well as extensive play spaces (amounting to 2,750sqm) that exceed policy requirements, catering to different ages and play styles. The Scheme will also improve the permeability of the Estate and create new north-south and east-west public connections throughout it. The measures will boost the Estate’s biodiversity by achieving a net gain in biodiversity habitat units by 14.45%, alongside a series of ecological enhancements that will exceed the policy requirements in respect of urban greening. The design vision for the Estate has been devised with some key aspirations that respond to the constraints and opportunities of the setting. This includes:

- (a) The delivery of a ‘green heart’ for the Estate in the form of a community green, to replenish and enhance the open spaces available on the Estate at present.
- (b) A celebration and enhancement of trees, with proposals for significant tree planting, particularly within the public realm environment along Regina Road.
- (c) A key townscape principle that delivers higher density and tall buildings at the centre of the Estate and sensitive low scale buildings at the edges of the Estate when interfacing with existing residential context.
- (d) The delivery of more permeability and connectivity, including the provision of new public north-south and east-west pedestrian and cycle links across the estate from Sunny Bank to Regina Road and improved cycle infrastructure including the enablement of a potential connection from Regina Road to Bradshaws Close to the north.
- (e) The establishment of welcoming neighbourhood streets, incorporating strong active frontages and successful public realm design and landscape architecture.
- (f) The creation of a distinct place whose design draws from the Victorian architectural qualities of the surrounding local area.

7.2.5 *Enhancement of the local context* – The Scheme will complement the local context through its high-quality architectural approach that benefits from comprehensive, design-led master planning principles. The Scheme will reactivate and reinforce the frontage to Regina Road and will rationalise the layout of the wider estate. The building will be finished in high-quality materials that draw from the heritage of the local

area. The Scheme will not incur harm to any designated or non-designated heritage assets in its surroundings and will have wholly positive or neutral effects on the local townscape. Open and natural spaces are integrated into the design of the public realm on-Estate and in the surrounding area. The community green at the centre of the Scheme will create greater permeability across the Estate and into the neighbourhood, with smaller pocket parks, green links and play areas integrated throughout the Estate. The open and natural spaces in the Scheme are designed to be flexible, multi-functional and accessible for everyone.

7.2.6 *Environmental sustainability* – The Scheme will be powered by green energy. Reduced carbon emissions through the use of low or zero carbon technologies (photovoltaics and air source heat pumps) will be achieved alongside measures such as high insulation standards and efficient building services. The development will exceed the required sustainability and energy targets. The development will also adhere to the latest whole life cycle carbon and circular economy principles and would implement targets for recycling of construction waste and the reuse of materials. The design and construction of the Scheme prioritises sustainability by using recycled and other sustainably sourced materials, integrating green infrastructure on-Estate, maximising natural lighting and ventilation, and employing building techniques designed to minimise environmental impacts

7.2.7 *Acceptable impact on the capacity of the transport network* – The proposed use is projected to result in a reduction in the number of car movements to and from the Estate when compared with the existing arrangement and to result in a positive modal shift towards active travel modes among residents. The Scheme has been designed to improve pedestrian and cycle connectivity within the estate and will provide new vehicle, cycle and pedestrian routes through the Estate, along with two off-street parking courts. In proposing 52 off-street car parking spaces, incorporating an uplift in blue badge car parking provision within Phase 1, the development will deliver a quantum of car parking which balances the needs of existing returning residents who use and rely on a car and the combined benefits associated with encouraging a modal shift towards active modes and delivering a landscaping led public realm design. A range of measures to encourage and maximise the uptake of sustainable travel modes by building users will be secured through a Residential Travel Plan. In assisting with this, policy requirements in respect of cycle parking provision are achieved in full within the development. To prioritise and encourage walking, the Scheme will be well integrated into existing travel networks, linking up to infrastructure surrounding and near to the Estate via continuous and accessible routes. This will be supported by the inclusion of clear signage and wayfinding throughout the Estate, as well as new pedestrian routes running north to south between Sunny Bank and Regina Road that further connect the Estate to the wider public transport and cycle network. The Estate is within walking distance of varied commercial and community uses including grocery stores, cafes, pubs, community centres, parks and leisure centres. It is also very well connected to a range of public and active travel infrastructure which provide access to services across London and beyond.

7.2.8 *Job, skills and training* – The Scheme will create a significant number of jobs for those working on its construction and would be beneficial to

the local supply chain. The Council is committed to developing an employment, skills and training strategy that would set targets for local employment through work with the Council's employment team. The proposal would therefore support new jobs and help residents gain new skills via training and apprenticeships. During the construction of the Scheme, there will be the opportunity for employment through temporary construction work, although construction employment is difficult to quantify due to the fluctuation of work throughout the construction period. The Scheme is residential led, with the only non-residential components being the community space and pre-school. Therefore, there are limited opportunities for local employment and training once the Scheme is complete and operational. However, the community space provided by the Scheme will include flexible space for training, which may aid local residents in upskilling and finding employment.

7.2.9 *Local environmental improvements* – The Scheme will be safe in relation to the water environment and would achieve a reduction in the Estate's natural drainage. Sustainable urban drainage systems, including nature-based systems, are to be used in the form of swales within the landscaping and a subterranean drainage storage tank. The Scheme will facilitate the remediation of Council land to a high standard.

7.2.10 *Local health and socioeconomic improvements* – The Scheme will result in numerous positive health outcomes as assessed in line with the NHS London Healthy Urban Development Unit Health Impact Assessment toolkit, which covers Healthy Housing, Active Travel, Healthy Environment and a Vibrant Neighbourhood.

Phase 2 Benefits

7.2.11 As detailed in this Statement of Reasons, Phase 2 is continuing to be developed. As matters stand, it is proposed that Phase 2 will deliver up to 115 open market dwellings in the southwest part of the Estate. It currently benefits from outline permission with all matters reserved.

7.2.12 The benefits of Phase 2 have not been set out in detail as they have for Phase 1. This is in recognition that these remain under development. As previously explained, the main benefits in which the Council seeks to rely on in order to justify the use of its CPO powers are found in the delivery of Phase 1. Benefits associated with the delivery of Phase 2, which is contingent upon the delivery of Phase 1, would be additional to these.

7.2.13 As matters currently stand, it is anticipated that Phase 2 of the Scheme will deliver a significant benefit being an increase in the number of additional dwellings to be delivered to the Council's local area, with an anticipated 115 dwellings to be delivered under Phase 2.

7.2.14 As described in the introduction above, all of the Order Land is required for the delivery of Phase 1. No additional land is required for delivery of either Phase 1 or the Scheme in full (save for the open space land/ play and sports facilities which is to be dealt with via appropriation). The Council is satisfied it is seeking to acquire all land necessary with its CPO powers for the purpose of delivering both Phase 1 (which has

a significant number of benefits as detailed above) and the Scheme in full.

8 Planning

- 8.1 The Council submitted the Planning Application relating to the development to deliver the Scheme on 17 June 2025 and the Planning Permission was granted on 12 January 2026.
- 8.2 Reserved matters applications will follow for Phase 2, however, the Council's priority at this stage is to progress the Phase 1 redevelopment of the Estate. As such, the precise timescales for the delivery of Phase 2 are yet to be finalised.
- 8.3 The Council are content that there is no question of a planning impediment to the delivery of the Scheme, Planning Permission is extant. In addition, there are no unusual or onerous conditions to cause concern. The Reserved Matters Applications for Phase 2 will come forward in the normal way. In addition, the planning policy framework hasn't changed since the date of the planning decision, and therefore the grant of the Planning Permission alone demonstrates it is in accordance with the planning framework.
- 8.4 The Council have identified some minor amendments required to the Planning Permission as a result of some typographical errors identified within the description of the development, some of the conditions and plans to the permission. The error related to the reference of 1-4 Sunny Bank which should have in fact referred to '1-4b Sunny Bank'. As can be seen from the submitted plans for the redevelopment, it was always the intention for 1-4b Sunny Bank to be included. As such, a Non-Material Amendment Application was submitted and was later approved by the Local Planning Authority on 11 February 2026 (**Document F3**).
- 8.5 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), the planning application was determined in accordance with the Development Plan.
- 8.6 The adopted Local Plan comprises:
- 8.6.1 The Croydon Local Plan (2018) (**Document B5**); and
 - 8.6.2 The London Plan (2021) (**Document B6**).
- 8.7 In considering the development proposals, other relevant documents which formed material considerations in the determination of the Planning Permission included the following:
- 8.7.1 National Planning Policy Framework (NPPF) (2023) (**Document B7**),
 - 8.7.2 National Planning Practice Guidance (NPPG) (2014, as updated) (**Document B8**), and
 - 8.7.3 Draft Croydon Local Plan Revised (Regulation 19) (2024) (**Document B9**).
- 8.8 Given that the LBC Draft Local Plan has not yet been subject to an Examination in Public it carried only limited weight in decision making but nonetheless gathers weight as the plan making process continues.

Estate Designations and Allocations

- 8.9 Within the adopted Local Plan Policies Map, the Estate is not allocated and does not fall within any specific policy designations.
- 8.10 Within the emerging Local Plan Policies Map, the Estate is allocated as 'Estate New 2: Development Estate, Regina Road Housing Estate' for the purposes of "estate renewal for residential development with retention of community facilities" to "help to meet the need for new homes in the borough". The allocation is anticipated to be delivered between 2024 and 2029 and has an indicative number of homes of 260.
- 8.11 The emerging Local Plan designates the Regina Road Housing Estate allocation as a Tall Building Zone, as recommended within the Croydon Tall Buildings evidence base document (prepared by Allies and Morrison in March 2024). As set out in draft Policy SP4.5, Regina Road Housing Estate is therefore intended to be an area where buildings taller than 21m in height are appropriate.
- 8.12 Beyond Local Plan policy designations, a Tree Protection Order (TPO) applies to a holm oak tree which sits to the east of the Estate's existing pre-school. Part of the root protection area of another TPO tree, a sycamore, lies just inside the northern boundary of the Estate. The tree itself sits outside of but close to the northern boundary of the Estate, on the south side of Camille Close.
- 8.13 Notwithstanding the fact there is no planning impediment, the Council have set out the key areas of policy compliance and benefit of the Scheme below:

Planning Policy Assessment

Planning Benefits

- 8.14 **Regeneration (Ch.2, 5, 11 and 12 of the NPPF, Policies H1, GG2, D1, D3, D4 and D5 of the London Plan)** – The Scheme will develop a strategic Estate in an important location close to South Norwood District Centre and would contribute to local regeneration in accordance with the intentions of the emerging Estate Allocation for Regina Road Estate. The Scheme removes existing poor-quality housing and the associated structural, fire and health & safety issues and its replacement with high quality housing, thereby ensuring an approach that aligns with preferences expressed in a public ballot of estate residents in 2023.
- 8.15 **Delivery of new and improved homes (Ch.2, 5 and 11 of the NPPF, Policies H1, H4, H6, H8 and D6 of the London Plan, Policy SP2 of the Local Plan)** – The Scheme will enable the estate's existing residents to be rehomed in higher quality and safer dwellings. The Scheme will also significantly increase the number of Social Rent, Shared Ownership and market homes on Estate, enabling the Scheme to meaningfully contribute to delivery against Croydon's housing targets delivering an additional 59 new affordable housing units representing a 35.5% increase from the current affordable housing units on the Estate.
- 8.16 **Creation and Improvement of community infrastructure (Ch.11 and 12 of the NPPF, Policies S3, S5 and GG2 of the London Plan)** – The Scheme would replace the existing pre-school premises with an improved purpose-built facility and will ensure the meanwhile relocation of the pre-school within the local area during construction. The Scheme would also replace the existing sports and play facilities on the Estate, including the multi-use games area, ensuring a more diverse and inclusive array of spaces is created. The Scheme will establish a new community space for the benefit of residents.

- 8.17 **Landscaping and Urban Greening (Ch.2, 11 and 12 of the NPPF, Policy GG2 of the London Plan)** – The Estate at present is comprised of a central green space as well as various tracts of leftover green space around the Estate’s edges which offer little meaningful amenity. The Scheme stands to substantially improve the landscaping and public realm within the Estate, delivering more than 5,000sqm of new open space, with a new community green at its centre, alongside the planting of approximately 208 new trees to transform the public realm. Residential courtyards for new blocks will be delivered as part of this, as well as extensive play spaces (amounting to 2,750sqm) that exceed policy requirements, catering to different ages and play styles. The Scheme will also improve the permeability of the Estate and create new north-south and east-west public connections throughout it. The measures would boost the Estate’s biodiversity value by, achieving a net gain in biodiversity habitat units by 14.45% alongside a series of ecological enhancements and would exceed the policy requirements in respect of urban greening.
- 8.18 **Enhancement of the Local Context (Ch.11 and 12 of the NPPF, Policies S3, S5, GG2 and D3 of the London Plan)** – The Scheme will complement the local context through its high-quality architectural approach that benefits from comprehensive, design-led masterplanning principles. The Scheme will reactivate and reinforce the frontage to Regina Road and will rationalise the layout of the wider estate. The building will be finished in high-quality materials that draw from the heritage of the local area. The Scheme would not incur harm to any designated or non-designated heritage assets in its surroundings and will have wholly positive or neutral effects on the local townscape.
- 8.19 **Environmental Sustainability (Ch.2 of the NPPF)** - The Scheme will be powered by green energy. Reduced carbon emissions using low or zero carbon technologies (photovoltaics and air source heat pumps) will be achieved alongside measures such as high insulation standards and efficient building services. The Scheme has exceeded the required sustainability and energy targets. The Scheme would also adhere to the latest whole life cycle carbon and circular economy principles and would implement targets for recycling of construction waste and the reuse of materials.
- 8.20 **Acceptable impact on the capacity of the transport network (Policy DM1 of the Local Plan)** – The proposed use is projected to result in a reduction in the number of car movements to and from the Estate when compared with the existing arrangement and to result in a positive modal shift towards active travel modes among residents. The Estate has been designed to improve pedestrian and cycle connectivity within the Estate and will provide new vehicle, cycle and pedestrian routes through the Estate, along with two off-street parking courts. A range of measures to encourage and maximise the uptake of sustainable travel modes by building users will be secured through a Residential Travel Plan. In assisting with this, policy requirements in respect of cycle parking provision are achieved in full within the Scheme.
- 8.21 **Job, Skills and Training** - The Scheme will create a significant number of jobs for those working on its construction and would be beneficial to the local supply chain. The Council is committed to developing an employment, skills and training strategy that would set targets for local employment through work with the Council’s employment team. The Scheme therefore supports new jobs and help residents gain new skills via training and apprenticeships.
- 8.22 **Local Environmental Improvements (Ch.2, 11 and 12 of the NPPF)** – The Scheme will be safe in relation to the water environment and would achieve a reduction in the Estate’s natural drainage. Sustainable urban drainage systems,

including nature-based systems, are to be used in the form of swales within the landscaping and a subterranean drainage storage tank. The Scheme will facilitate the remediation of Council land to a high standard.

- 8.23 **Local Health and Socioeconomic Improvements (Ch.2, 8 and 12 of the NPPF, Policies S3 and S5 of the London Plan, Policies SP5.3, SP5.4 and SP5.5 of the Local Plan)** – The Scheme will result in numerous positive health outcomes as assessed in line with the NHS London Healthy Urban Development Unit Health Impact Assessment tool. Full fibre connectivity will also be delivered as part of the Scheme.

9 Alternatives to Compulsory Purchase

- 9.1 In accordance with the CPO Guidance (see paragraph 109.1), it must be considered whether the purpose for which the acquiring authority is proposing to acquire the land could be achieved by any other means.
- 9.2 The Council has fully considered this issue and has concluded there are no other suitable alternatives to secure the benefits of the Scheme, other than by way of the use of CPO powers.

Delivery of an Alternative Scheme

- 9.3 The Council has considered at paragraphs 9.8 to 9.15 whether there is a way in which the Scheme can be delivered without acquiring the Order Land. It has concluded that there is not.
- 9.4 Due to the site-specific nature of the issues facing the Estate, there is no alternative Estate at which the proposals can be delivered.
- 9.5 Given the condition of the Estate currently, it is vital to demolish the buildings on the Order Land and replace these with dwellings of a better and modern standard.
- 9.6 Given the pressing need for additional affordable and market homes, an option involving redevelopment (rather than just refurbishment) is required.
- 9.7 No person is known to have an alternative proposal to the Scheme, either which delivers the same benefits or at all.

Refurbishment of the Estate

- 9.8 The Council has considered the alternative of refurbishment of the Estate as opposed to demolition and rebuilding. This was considered in detail during the Council's Cabinet decision of 16 November 2022. What the analysis presented clearly highlighted was that the option to rebuild came with a number of significant benefits for the redevelopment of the Estate. These include: a longer expected life of the buildings, certainty around EWS1 A Fire Safety, compliance with modern space standards, amongst other benefits.
- 9.9 The Council carried out a pre-demolition audit in relation to the Scheme (**Document A6**) to evaluate the potential possibility of integrating the existing buildings, rather than demolishing them all, into the proposed development. The audit concluded that:

- 9.9.1 Due to the age, build quality, foundation capacity and structural issues associated with the LPS panels, it would not be suitable to retain and reuse the existing buildings.
- 9.9.2 It was not deemed possible to retain and retrofit the existing buildings while also meeting the proposed brief/design for the Estate, as the footprints are currently hindering the efficiency of the placement of buildings to achieve the proposed number of units.
- 9.9.3 The tower blocks pose issues such as structural stability and poor construction quality as result of the LPS panels. Further, it is estimated that the existing buildings were constructed in the 1960s and therefore likely would not be able to meet current building standards without significant alterations.
- 9.9.4 Following input from the structural engineers, the existing building structure and foundations are not judged to be structurally capable of supporting the added loads of the much larger buildings proposed for the Estate. Given the structural inadequacy, there is no clear way that any of the structure could be retained in part to be integrated into the proposed building.
- 9.9.5 Given the Estate constraints, it would not be spatially feasible nor beneficial in terms of carbon to construct the proposed development around the existing building while retaining the existing structure.
- 9.10 As such, the existing buildings cannot feasibly be incorporated as part of Estate redevelopment; and redevelopment through demolition and rebuilding is therefore necessary. This was further supported following the demolition of Block 1-87.
- 9.11 Any refurbishment of the Estate would still cause disruption to its residents. There would be a need to relocate residents whilst these works were underway and so its impact compared to rebuilding is relatively similar.
- 9.12 It is clear that the benefits of rebuilding the Estate far outweigh the refurbishment option and will generally be better for the Borough as a whole offering modern living spaces with better living standards and general longevity for its residents.

10 Funding and Delivery

Funding – Phase 1

- 10.1 The Council's current estimates indicate delivery of Phase 1 would cost approximately £171 million and it is proposed this will be funded through several resources:
- 10.1.1 Approximately £1.2m One Public Estate ('OPE') Brownfield Land Release Fund ('BLRF') grant funding (which will be used towards demolition);
- 10.1.2 £52.25m GLA grant funding granted on 4 March 2025 to be allocated in tranches (which will be used towards acquisition of land (if required) and the Scheme) (broken down as £19.24m for Phase 1 North and £33.01m for Phase 1 South); and

- 10.1.3 The remainder of the funding will be provided by the Council via its Housing Revenue Account reserves and debt funding from the Public Works Loans Board.
- 10.2 The proposed Scheme falls under the Affordable Homes Programme 2021-2026. The Council applied to the GLA for grant funding for the Scheme under its London Estate Regeneration Fund in November 2023. The Council's application sought grant funding to enable delivery of 225 affordable homes within the proposed development.
- 10.3 The Council received confirmation of the success of their bid and were awarded a grant allocation of £52.25 million to be allocated in tranches by the GLA in March 2024. The relevant funding agreement was entered into on 4 March 2025 (**Document A7**).
- 10.4 An application was made to the DLUH&C (now MHCLG) for the OPE BLRF grant funding on 14th February 2024. As part of its application, the Council submitted a proposal to seek funding towards Estate clearance and demolition works to support the onward delivery of the first phase of the 75 homes. £1.258m of funding has been awarded.
- 10.5 This funding approved by the DLUH&C and the relevant funding agreement was entered into on 10 September 2024 (**Document A8**).
- 10.6 As detailed above, in addition to the grant funding the Council will also fund the delivery of the redevelopment both through funds allocated from its Housing Revenue Account, as well as debt funding via the Public Works Loan Board.
- 10.7 Use of these funds will be assessed on a cyclical basis, to consider where funds can be allocated in order to deliver the Scheme
- 10.8 The Council will determine whether to use HRA funds, debt funding, or a blend of both on this cyclical basis. Any funds obtained by debt borrowing will be from the Public Works Loan Board and these are anticipated to be at preferential rates based on the Council's previous experience in funding project costs.
- 10.9 The Council is confident in their ability to source the necessary funds to support the delivery of the redevelopment, in addition to the use of the already secured grant funding.
- 10.10 The funding listed at paragraph 10.1, will facilitate the demolition and Estate clearance, assembly of land and delivery of Phase 1.
- 10.11 It is recognised that there will be a continued risk of increases to the costs of the Scheme through construction cost inflation, but the Council has in place the necessary finance, management and governance arrangements to ensure that the Scheme will be delivered in accordance with the requirements of the GLA Funding.

Funding – Phase 2

- 10.12 The funding position continues to be developed for Phase 2 of the Scheme. However, there are multiple funding sources available to the Council to bring forward Phase 2 of the Scheme, and the Council has a reasonable expectation, that the funding for Phase 2 will come forward in order to enable this part of the Scheme to be delivered. In addition, the funding position for the delivery of Phase 1 is robust.

Scheme viability generally

- 10.13 In June 2025, the Council instructed Savills to undertake a financial viability assessment, this assessment has concluded that the Scheme does not achieve standard viability thresholds based on the proposed tenure mix as it generates a significant negative residual land value (**Document A9**). This is an expected outcome due to the high proportion of affordable homes being delivered and is considered typical of a project of this nature, which is being supported by grant funding.

Conclusions on funding impediments

- 10.14 The Council is therefore satisfied that there is an appropriate approved budget and funding in place to enable the delivery of Phase 1. In particular, funding is available now to deal with any blight claims that might arise.
- 10.15 There is therefore no known financial impediment or reason why the Council would not be able to acquire all the interests in the Order Land or successfully deliver the Scheme if the CPO is confirmed.

Delivery

- 10.16 The Council secured permission to carry out the demolition of 1-87 Regina Road, a 13-storey residential tower, on 4 October 2024 (reference: 24/02656/PAD), and this has now been completed.
- 10.17 In order to progress the demolition, all residents were rehoused into either existing Council voids or into the new build properties at Trellis Mews in order for the empty building to be handed over to the demolition contractor.
- 10.18 Initial Demolition Notices have been served on the residents of 89-123 Regina Road (**Document G1**).
- 10.19 A requirement of the £52.25 million GLA grant allocation is to deliver all grant funded affordable homes under one new build construction contract. The Council is anticipating awarding a new build construction contract for the construction of the 225 affordable homes comprised in Phase 1 in March 2026.
- 10.20 The GLA grant funding is subject to project milestone dates, with a start on site requirement ('**Start on Site**') to be achieved by March 2026 for the grant funding to be claimed.
- 10.21 Whilst demolition has completed for Plots 1 to 87, this is not in accordance with the Affordable Housing Capital Funding Guide and therefore, Start on Site has not yet commenced. To formally Start on Site, the Council either needs to commence demolition works on the pre-school or commence the construction of the new Block A by March 2026. It is anticipated these milestones will be achieved by the end of March 2026.
- 10.22 The Council's current indicative timetable for delivery of Phase 1 (including obtaining vacant possession) is as follows:
- (a) Phase 1 A1:
 - (i) Block 1-87: vacant possession ("VP") was achieved in June 2024 and demolition of Block 1-87 commenced in January 2025 and is now complete.

- (ii) Block 89-123: VP proposed for December 2026 for demolition start on site January 2027. The current forecasted practical completion date for demolition being May 2027.

(b) Phase 1 B2:

- (i) Pre-School VP proposed by February 2026 with practical completion of demolition being forecasted for December 2026.
- (ii) 110A VP proposed by April 2026 with practical completion of demolition being forecasted for December 2026.
- (iii) Blocks 112-128: VP proposed by November 2027 with practical completion of demolition being forecasted for November 2028.
- (iv) Blocks 2-56a: VP proposed by February 2029 with practical completion of demolition being forecasted for January 2030.
- (v) Blocks 5-8B VP proposed by February 2029 with practical completion of demolition being forecasted for November 2029.
- (vi) 58-108a: VP proposed for November 2027 with practical completion of demolition being forecasted for November 2028.
- (vii) Block 1-4B and 5-8B: VP proposed by February 2029 with practical completion of demolition being forecasted for November 2029.

10.23 Protracted negotiations with the remaining interest holders will have an impact on the Council's vacant possession dates and therefore the rolling construction programme. Delays to the Scheme being delivered will also have an impact on construction and other Scheme costs. As such, a CPO needs to be pursued in parallel with acquiring the remaining interests by agreement to avoid these consequences.

11 Impediments

11.1 Paragraph 15 of the CPO Guidance states that an acquiring authority will need to show that delivery of the Scheme is unlikely to be prevented by any physical, financial or legal impediment.

11.2 Key elements to consider are summarised below:

Planning

11.3 Section 8 of this Statement of Reasons details the current planning position for the Scheme.

11.4 Planning Permission is in place for development comprised in the proposed Scheme and therefore there is no impediment to the delivery of the Scheme from a planning perspective.

Appropriation

- 11.5 As part of the Council's land referencing exercise, this has identified parcels of open space within the Estate's red-line boundary. This land has been excluded from the boundary of the Order Land.
- 11.6 The Council intends to appropriate the land for planning purposes under Section 122(1) of the Local Government Act 1972 (**Document D8**) in order to override rights by virtue of S203 of the Housing and Planning Act 2016 (**Document D4**) to enable the delivery of the Scheme.
- 11.7 The Council will be progressing the appropriation of this land in parallel with the CPO and do not consider this will be an impediment to the delivery of the Scheme.

Anchor Hanover Group care home access

- 11.8 As part of Plot 13, there is a private vehicular access to the Anchor Housing Association Hanover Group care home (the "Care Home"). The Care Home is not located within the Order Land, and this vehicular access is the sole access to the rear of the Care Home, including access to designated parking spaces upon their land.
- 11.9 Discussions have taken place with Anchor Housing Association with this access and the Council has agreed to construct an alternative access/route to enable access to the Care Home to be maintained. The Council will ensure that the alternative access is in place and operational before the existing accessway is interfered with / removed.

Funding

- 11.10 As detailed at Section 10 of this Statement of Reasons, the Council have adequate financial resources to deliver the Scheme.
- 11.11 The Council are confident that there are sufficient funds available both to deliver the Scheme and to be able to deal with interest holders of the land both via acquisitions and compensation claims brought via the Upper Tribunal.
- 11.12 There is therefore no known financial impediment or reason why the Council would not be able to successfully deliver the Scheme if the CPO is confirmed.

Delivery

- 11.13 The Scheme is to be delivered in two phases. Phase 1 contains 225 affordable homes against which the Council has been allocated grant funding. The delivery of Phase 1 requires all existing properties on the Estate to be acquired and demolished. The Scheme is at considerable risk if the Council does not obtain ownership and control of all privately owned properties and rights within the Estate at a reasonable cost and in line with the Scheme programme requirements.
- 11.14 In the absence of a CPO, or the authority to make and implement a CPO if required, negotiations with owners of privately owned properties could become much more difficult and protracted, which would prevent the delivery of all or part of the Scheme, and put the GLA grant funding at risk. As such, a CPO is necessary to ensure delivery of the Scheme.

12 Engagement with Residents and steps taken to acquire the Order Land by agreement

Engagement with residents

- 12.1 The CPO Guidance states that powers to compulsorily purchase land are intended to be used as a method of last resort. The Council are expected to engage with residents and take reasonable steps to acquire the Order Land by agreement.
- 12.2 Engagement with residents began in mid-2021, with a daily presence on the Estate. At that time, a regular newsletter and bulletin for residents was also being produced and circulated. The Council continues to hold sessions every Tuesday and Thursday in Flat 62 on the Estate, which residents can attend on an ad hoc basis.
- 12.3 A reference group was also formed at the beginning of 2022 consisting of a small group of residents representing all three blocks on the Estate. It was created to support and engage with residents about repairs, works and improvements taking place at Regina Road over the short, medium and looking ahead to the future.
- 12.4 A 'Walkabout' was held with residents of the three tower blocks on the evening of 13 July 2022. This involved a number of officers attending the Estate in the evening to understand to understand safety concerns and to be able to see the Estate from a tenant's view. The main issues raised were repair issues, some dating back several years and related to general whole block fabric/service failures which keep re-occurring despite repeated attempts to fix. Residents present understood the difficulties associated with blocks, given they are nearly 60 years old, and emphasised they would appreciate new homes in preference to the continuous process of patching old homes. Some residents said they would be happy to move away from Regina Road.
- 12.5 The Council continues to engage with residents in line with the Residents Charter of Principles in relation to the Scheme (the '**Residents Charter**'). Resident engagement has been extensive and ongoing since July 2022. A key element of the Landlord Offer is the emphasis on resident engagement throughout the design and development process.
- 12.6 During the planning process, the Council has consulted and engaged with stakeholders so as to address any potential objections to the proposed Scheme and to ensure that the Scheme proposed is deliverable. As a part of this, the Council undertook a comprehensive engagement exercise to consult the estate and local residents on various elements of the design proposals. A statement of community involvement was also included within the Planning Application and very few planning objections were received from residents of the Estate.
- 12.7 Regular monthly meetings with residents via a Resident Working Group ('**RWG**') have been ongoing since July 2023. Various consultants, designers and sub-consultants have attended the RWG to discuss a range of topics, including design approach, open space and landscape design, demolition, transport and accessibility. Future topics will include heating and hot water systems-
- 12.8 The RWG operates with a flexible and evolving core membership. There are 21 residents on the RRRWG ('Regina Road Resident Working Group') distribution list who receive meeting invitations, papers, notes and updates by email and text message. Over the past six months, the active core has comprised 7 tenants and 1 leaseholder, together with one freeholder outside the CPO red line who attends regularly, alongside occasional ad-hoc attendance from other residents. Regular invitations to join or attend the group, and updates on RWG activities, are included in each estate newsletter to support open engagement throughout the redevelopment process. The RWG was created to represent the residents and ensure that there is a resident focused approach in the delivery of the regeneration programme and sets out to:

- 12.8.1 Work in partnership with the Council and other partners to ensure the regeneration plans for the Estate meet residents' needs and aspirations;
 - 12.8.2 Provide an independent check, scrutiny, and if required, challenge the delivery of the programme;
 - 12.8.3 Support Regina Road residents and the surrounding community, allowing them to be informed, involved and have influence on the regeneration programme;
 - 12.8.4 Promote a sense of community and common purpose and unite all residents, existing and new, living on the estate to create a proactive and resilient community; and
 - 12.8.5 Develop a core group of key residents that have a variety of abilities that can effectively represent the wider Regina Road community over the lifetime of the regeneration.
- 12.9 A series of 'block' meetings took place with residents between February and April 2024. Officers presented and obtained resident's views on the phasing strategy. Residents were supportive and were largely concerned with understanding sub-phasing to greater detail. The dates of these meetings are as follows:
- 12.9.1 89-123 Regina Road – 21 February 2024
 - 12.9.2 RWG – 28 February 2024
 - 12.9.3 High Rise meeting – 9 April 2024
 - 12.9.4 Sunny Bank and remaining blocks – 10 April 2024
 - 12.9.5 RWG and demolition – 18 April 2024.
- 12.10 A public consultation to present the emerging pre-planning application proposals took place in July 2024.
- 12.11 Since the outcome of that public consultation in July 2024, the following consultation events, community engagement sessions, webinars, workshops, exhibitions and family fun days have taken place with all residents;
- 12.11.1 6 July 2024 – Consultation Event – Family Fun Day;
 - 12.11.2 11 July 2024 – Consultation Event – Public Exhibition;
 - 12.11.3 16 July 2024 – Consultation Event – Webinar;
 - 12.11.4 26 February 2025 – Community Engagement Session;
 - 12.11.5 30 April 2025 – Parking Workshop Consultation;
 - 12.11.6 27 May 2025 – Regina Exhibition;
 - 12.11.7 29 May 2025 – Regina Webinar;
 - 12.11.8 31 May 2025 – Family Fun Day;

- 12.11.9 17 July 2025 – RWG Session;
- 12.11.10 11 September 2025 – Newsletter sent to Estate and surrounding area;
- 12.11.11 24 September 2025 – Playground Consultation Event;
- 12.11.12 2 October 2025 – RWG Session;
- 12.11.13 14 October 2025 – Project update meeting;
- 12.11.14 13 November 2025 – Estate Walkabout
- 12.11.15 20 November 2025 – Independent Tenant and Leaseholder Advisors ('ITLA') meet and greet
- 12.11.16 20 November 2025 - RWG Session
- 12.11.17 5 to 6 December 2025 – Newsletter sent to Estate and surrounding areas; and
- 12.11.18 16 December 2025 – RWG Session.

Steps taken to acquire the Order Land by agreement

- 12.12 Following the decision to proceed with the Scheme, the Council has placed a priority on negotiating with the interests on a phased basis. Therefore, prioritising those blocks within the earlier phases of the Scheme in order to achieve vacant possession in line with its delivery programme. That said, the Council have remained open to progressing acquisitions with all affected interest holders across the Estate so as to ensure interest holders are not left to wait where they may wish to move from the Estate sooner.
- 12.13 As of the end of February 2026, the Council has achieved 52% vacant possession (being 99 voids out of 191) of the Estate. Whilst this is a positive number, it is plain that further progress needs to be made in order to achieve vacant possession of the whole Site within the required timescales.
- 12.14 Given the progress made with acquisitions to date, the Council is mindful of the anticipated timescales to progress the redevelopment, and as such, the Council has no choice but to pursue a CPO in parallel (in accordance with the CPO Guidance) to make sure that all interests are secured and the Scheme can be brought forward.
- 12.15 Detail of the progress of negotiations to date are set out below:

Freeholders and leaseholders

- 12.16 Consultation with freeholders and leaseholders began shortly after the ballot was announced in June 2023. Since that period, every effort has been made to seek agreement with the freeholders and leaseholders to acquire their properties by agreement. To help these residents understand the Landlord's Offer and to answer their questions in relation to the process, the ITLA (commissioned December 2022) have attended the Estate on a regular basis with over 200 drop-in sessions held to date. Sessions are currently taking place fortnightly on Wednesdays and on the last Saturday of each month. At various stages these sessions have been held more frequently, with dates and times adjusted to reflect demand and events taking place on the Estate.

- 12.17 In addition to the scheduled drop-in sessions, there have also been ad-hoc one-to-one conversations arranged outside of the set dates to meet residents' needs, including home visits, telephone calls and meetings alongside council staff.
- 12.18 These sessions comprised of conversations covering the following points:
- 12.18.1 The valuation process and how leaseholders can challenge the Council's valuations;
 - 12.18.2 The compensation package under the Landlord Offer;
 - 12.18.3 The shared equity offer and how this would work and be administrated, the main issue being, in the absence of any new build for Phase 1 of the Scheme, the amount of equity the Council will commit to on a property situated outside of the Estate;
 - 12.18.4 What a CPO is, how it works and how long it takes to be fully implemented;
 - 12.18.5 How the independent financial advisor would work in the case of leaseholders taking up the offer of a shared equity property with the Council;
 - 12.18.6 How leaseholders can appoint their own surveyor and solicitor to act in the sale of their property to the Council and the purchase of a new property;
 - 12.18.7 Separate individual issues which relate to leaseholders' personal situations rather than any issues relating to a CPO.
- 12.19 Newsletters are distributed approximately quarterly to all households within the Estate. The Regina Road newsletter of April 2024 included a summary and a reminder of the details of the offer available from the Council to leaseholders and as set out in the Landlord's Offer, as did that issued in September 2025.
- 12.20 In addition, a letter was issued to leaseholders and freeholders on 30 July 2025, to provide an update to residents and to remind leaseholders of the details of the Landlord Offer available. The letter also provided information on the next steps the Council would be taking to progress a CPO.
- 12.21 To date, the Council has acquired 8 leasehold interests on the Estate by agreement, being 67 Regina Road, Flat 5, 110A Regina Road, 117 Regina Road, 122 Regina Road, 119 Regina Road, 115 Regina Road, 38 Regina Road and 123 Regina Road. This leaves 17 remaining interests (both leasehold and freehold) to be acquired by the Council.
- 12.22 Out of these remaining interests the progress of the negotiations with the remaining leaseholders and freeholders is as follows:

Negotiations near complete – acquisition underway	Active negotiations ongoing	Contact made, negotiations to commence shortly	Contact made, resident unwilling/not yet ready to negotiate

4	8	2	3
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Council secure and private tenants

- 12.23 The Council has undertaken extensive engagement with Council secure tenants affected by the proposed CPO, which commenced in July 2023.
- 12.24 Initial engagement with residents of Block 1-87 began on 7 July 2023 with written correspondence inviting residents to individual meetings with the Interim Head of Homelessness and the Housing Officer. This was followed by face-to-face meetings on 13 and 14 July 2023, during which individual housing options were discussed with residents and internal rehousing forms were completed.
- 12.25 For residents of Block 1-87, the Council established ongoing support mechanisms that continued until June 2024, including on-site meetings with ITLA every Wednesday and twice monthly on Saturdays, operation of a Resident Hub/Office at Flat 62, and continuous personal communications with residents via telephone, email and instant messaging. Information provided to residents included details of the ITLA service, drop-in sessions, and contact details for on-site staff.
- 12.26 Engagement with the residents of Block 89-123 commenced on 31 October 2023 with written correspondence inviting residents to individual meetings with Council staff, ITLAs and representatives from SNCK (South Norwood Community Kitchen) providing information about drop-in sessions and contact details for on-site staff.
- 12.27 On 6 November 2023, a further letter was sent to the whole Estate which provided a general update on the position and invited residents to a 'Question and Answer' session on 21 November 2023.
- 12.28 On 7 November 2023, a face-to-face meeting was held for the residents of Block 89-123. A further letter was sent on dated 8 February 2024 was delivered to residents of Block 89-123 which updated residents on the Estate, confirming a phased demolition and rebuild programme that includes 89–123 Regina Road, and invited affected households to schedule an individual appointment with the Council on 21 February 2024 to discuss the proposals, rehousing options, and access independent advice and support.
- 12.29 Additional individual face-to-face meetings were held with residents of Block 89-123 on 21 February 2024 regarding the next stages of the Scheme and how these might affect them, with further meetings taking place thereafter. Similarly to Block 1-87, ongoing engagement was provided through on-site meetings with ITLAs fortnightly and the last Saturday of the month. There is Council presence at the Resident Hub/Office at Flat 62 twice weekly, and continuous personal communications via calls, emails and WhatsApp. This ongoing support continued until tenancies had ended in February 2025.
- 12.30 There remain some ongoing communications with private residents in Blocks 89-123 to assist with the rehousing of private tenants, providing reasonable assistance to locate onward housing where possible. Initial Demolition Notices and a covering letter were hand delivered to residents on 11 September 2024.
- 12.31 More recently, engagement with residents of Block 110a has commenced with face-to-face meetings during the week commencing 2 June 2025 to discuss the timely decanting requirements arising from a change of phasing, and to gather household information and registration documents. Ongoing ad-hoc support

continues to be provided to Block 110a residents through the Resident Rehousing Hub at Flat 62 operating twice weekly, with continuous communications via calls, emails and WhatsApp to discuss decanting, new home options and updates regarding moving arrangements.

- 12.32 All secure tenants residing on the Estate will be placed in priority band 1 upon completion of the necessary housing transfer form. Tenants across the Estate who have been notified of a move are being considered for all homes that become available within the housing stock. The prioritisation for rehousing is determined based on the greatest need relative to other band 1 residents across the borough.
- 12.33 It should be noted that the timing of property offers is dependent on the availability of homes, as outlined in section 2.4 of the Landlord Offer, and therefore specific timescales cannot be provided at this stage.
- 12.34 As is demonstrated above, the Council is maintaining regular contact with residents to obtain current information regarding their needs, which will continue to inform the prioritisation process.
- 12.35 The Council remain committed to supporting secure tenants across the Estate throughout the rehousing process, ensuring that all moves are managed with transparency and fairness in line with Landlord Offer (July 2023) and tailored engagement to meet the individual needs of each household. To gain vacant possession of blocks earmarked for demolition, the Council offers tenants up to three alternative accommodation choices. If a tenant considers all three options unsuitable, they have the right to request an independent review of the final offer by a dedicated Reviews Officer. Once the review process has been completed and if the third offer is still refused, the Council may begin early possession proceedings.
- 12.36 The Council continue to engage with residents through a range of methods, including face-to-face meetings, telephone calls, letters, and drop-in sessions. Tenant offers are made based on current bedroom need (at time of decant) and, wherever possible, endeavour to meet residents' preferred area of choice. A single point of contact, an on-site housing officer, is available for any queries or concerns during the rehousing process and available in the site office twice weekly and as and when needed. We aim to provide tenants a smooth transition, therefore households have the same housing officer for six months from the date they start their new tenancy, if they are moving into another Council home, to provide continuity and additional support during the transition period.
- 12.37 Of the 166 secure tenanted households (out of the total of 191 households within the red line), 44 were either rehoused prior to the Landlord Offer or did not qualify. Since the Landlord Offer was introduced, 47 tenants have been successfully relocated, with the majority moving into their first choice of suitable accommodation (out of three possible offers). No household has been required to accept a property beyond their third offer, and as a result, the Council has not needed to pursue any legal repossession proceedings to date.
- 12.38 Below table shows what percentage of households that have accepted their 1st, 2nd and 3rd choice (and Beyond 3rd Offer).

Property Offer	Percentage of Households
1st Choice	72%
2nd Choice	22%
3rd Choice	6%

Beyond 3rd Offer (Possession Proceedings)	0%
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Statutory Undertakers

- 12.39 As detailed at paragraph 2.7, there is an existing substation on the Estate that will be relocated and upgraded. The current strategy is for the plant room in Plot 18 (new Block A) to deal with the energy demands in respect of hot water and heating of both phases of the estate redevelopment.
- 12.40 The Council has been liaising with UKPN in respect of the development proposals and UKPN have commented throughout the planning process in relation to the design and location requirements. The Council will continue to work with UKPN post planning to ensure their requirements are satisfied as the Scheme is delivered.
- 12.41 In addition to this, where any statutory undertaker has apparatus within the Order Land, this will either be: (a) retained; or (b) where it is required to be relocated or adjusted, consent will be sought through the relevant statutory regime.

13 Special Considerations Affecting the Order Land

- 13.1 In the Protected Assets Certificate a nil return has been made (**Document A10**).
- 13.2 The Mining Code is not being included.
- 13.3 Statutory undertakers' land has been addressed in the preceding section.
- 13.4 No part of the Order Land comprises Green Belt nor Common Land or Open Space within the meaning of Section 19 of the 1981 Act (**Document D2**).
- 13.5 There are no known other obstacles to development, and the Council is not aware of any other special considerations.

14 Use of Section of the Housing and Planning Act 2016

- 14.1 Following the acquisition of land pursuant to the Order, the Council intends to rely on section 203 of the Housing and Planning Act 2016 (**Document D5**) ("section 203") to ensure the successful delivery of the Scheme. In particular, this will be utilised to override any relevant third party rights affecting the Scheme, subject to the payment of compensation.
- 14.2 Separately, the Council will be seeking to appropriate land not included within the Order Land to enable reliance on section 203 in relation to development on that land too. A report considering the use of section 203 in relation to the Scheme will be progressed shortly after the making of the Order.
- 14.3 It is considered that the use of section 203 is justified for the same reasons that the CPO is considered to be justified in this Statement of Reasons.

15 Human Rights Act and Public Sector Equality Duty

Human Rights Act

- 15.1 The Human Rights Act 1998 requires (amongst other things) that every public authority must act in a manner which is compatible with the European Convention

for the Protection of Human Rights and Fundamental Freedoms ("the Convention"). The Courts have held that the compulsory purchase of land is consistent with the Human Rights Act 1998 (**Document D6**) if it is in the public interest and is proportionate to the ends being pursued. The Council considers Articles 6 and 8 and Article 1 of the First Protocol of the Convention to be relevant (**Document D7**).

- 15.2 It is acknowledged that the compulsory acquisition of the Order Land will potentially amount to an interference with the human rights of those with interests in the Order Land. Article 1 of the First Protocol of the Convention provides that every natural or legal person is entitled to peaceful enjoyment of his possessions, and no one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by the law. Article 8 provides that everyone has the right to respect for their 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. The Council considers that the public interest and the public benefits of the Scheme (as described earlier in this Statement) in implementing the Scheme outweigh any interference with these rights which may be caused.
- 15.3 Article 6 of the Convention provides that everyone is entitled to a fair and public hearing in the determination of their civil rights and obligations.
- 15.4 Leaseholders and those with interests over the Order Land have had the opportunity to engage in negotiations for voluntary acquisitions prior to the CPO process being initiated. Objections can also be made to the CPO, which would be considered by an Inspector at a Public Inquiry. If the CPO were to be confirmed, an aggrieved person could also apply to the High Court seeking to quash a CPO if sufficient grounds could be demonstrated. Compensation will be payable based upon the principle of equivalence to those persons whose interests are acquired compulsorily. It is considered that the statutory procedures, which give the right to object and provide for judicial review, are sufficient to satisfy the requirements of Article 6.
- 15.5 The Council considers that there is a compelling case in the public interest to make the CPO which will facilitate the redevelopment of Regina Road Estate in accordance with the Scheme. The importance of implementing the Scheme is considered sufficient to justify interfering with the human rights of those with interests in the Order Land and that it would be appropriate and proportionate to make and confirm the CPO. Without the use of compulsory purchase powers, the delivery of the Scheme, and the benefits associated with this, is very unlikely to be achievable.

Equalities

- 15.6 In making the CPO the Council has also had regard to its public sector equality duty ('PSED') under s.149 of the Equality Act 2010 (**Document D8**). An Equalities Impact Assessment ('EqIA') review was carried out in respect of the Scheme in July 2025. The EQIA is evidence-informed and demonstrates a good level of engagement with residents. It appropriately identifies positive impacts across several protected characteristics (age, disability, pregnancy and maternity) and highlights meaningful mitigation plans during the construction phase.
- 15.7 There is a need for a deeper and more explicit treatment of racial disparities, particularly given the high representation of minoritised residents on the estate, and the historic issues of disrepair which have disproportionately impacted these groups. Although it is recognised as there is commitment to ongoing monitoring

and data collection, particularly on protected characteristics during key transition points (e.g., relocation and return). This will include systematic monitoring of CPO, acquisition, decant and rehousing outcomes by race; provision of translated and culturally appropriate communications; targeted outreach to minority ethnic residents to ensure understanding of rights and offers; tailored support for affected leaseholders and freeholders to access independent advice; and the application of equalities and anti-racism checks in decision-making to address any patterns of less favourable treatment.

- 15.8 There has been extensive consultation with affected residents by the Council, and the Ballot undertaken by the Council in relation to the Landlord Offer has allowed residents to vote on the Council's proposals. During all consultation to date, efforts have been made to pay due regard to all equality characteristics by ensuring that the consultation was accessible to all residents in particular those who may not have English as a first language and residents who are non-neurotypical. The data collected via the consultation exercises indicates that overall the Scheme will have a positive impact on age, disability, sex, race and religion and belief.
- 15.9 An EqIA has also been carried out in respect of the decisions to acquire land by agreement and where this is unsuccessful, to acquire land by compulsion (**Document A11**). The EqIA demonstrates that throughout all stages of the decision making process to date to promote and implement a CPO, the Council has had regard to (i) the need to eliminate unlawful discrimination, harassment, victimisations, (ii) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it, and (iii) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 15.10 In terms of its process, procedures and general behaviour towards affected parties to ensure there is no discrimination, the Council and its agents have sought to comply with government guidance on compulsory purchase and sought to reduce the anxiety that can be brought about by the threat of compulsory purchase, by ensuring that the affected parties are provided with as much information about what the CPO process involves and the indicative timetable of events. The Council has offered to alleviate any concerns about future entitlement to compensation by explaining to parties their entitlement to compensation.
- 15.11 In carrying out the compulsory purchase process, the Council and its agents have acted in accordance with relevant government guidance and statutory requirements, ensuring that affected parties are treated fairly, consistently and without discrimination. The Council has provided clear and timely information about the CPO process and the indicative timetable, explained statutory rights and entitlements to compensation, and offered advice and practical support to assist those who need to secure suitable alternative accommodation. In practice, many parties have chosen to source their own replacement properties, supported by their compensation entitlements.
- 15.12 Whilst the PSED was a relevant factor when the Council made its decision to make and implement a CPO, and remains such a consideration, it is only one factor that needs to be considered when making a decision and may be balanced against other relevant factors. The Council also took into account other relevant factors in respect of the decision, including sporting, regeneration, financial resources and policy considerations. In appropriate cases, such counterbalancing factors may justify decisions which have an adverse impact on protected groups.
- 15.13 The Council has given consideration to all the protected characteristics in the Equality Act 2010 to ensure that any potential impacts of the proposed CPO on the

affected groups of people have been considered and where possible mitigated. The Council will continue to consider equalities implications throughout the duration of the CPO and the Scheme including the needs of disabled residents affected through any transitions.

16 Conclusion

- 16.1 The Council has a clear idea of how it intends to use the land it seeks to acquire as identified in the Scheme and has secured Planning Permission for the Scheme.
- 16.2 The Scheme is to be delivered and funded from several sources which includes a significant contribution from GLA Grant Funding.
- 16.3 Finally, there is no known impediment to implementation upon confirmation of the Order.
- 16.4 For the reasons summarised above and set out more fully in this statement, the Council considers the Order to be within the necessary statutory powers and that a compelling case exists in the public interest for the making and confirmation of the Order. This then justifies interfering with the human rights of those with an interest in the land affected.

17 Statement as to the extent of the Scheme to be disregarded

- 17.1 For the purposes of assessing compensation to be awarded under the CPO Compensation Code, the Scheme to be disregarded is the residential led redevelopment of the Estate (including, for the avoidance of doubt, development within both the Phase 1 and Phase 2 area).

18 Further Information

- 18.1 Individuals seeking advice regarding the Order should in the first instance contact the Council by emailing reginaroad@croydon.gov.uk

19 List of Documents

- 19.1 This Council relies on the list of documents in support of its case for confirmation of the Order as Annexed at **Annex 1**. It reserves the right to add to the list of documents as it sees fit.

Annex 1 – List of Documents

**THE LONDON BOROUGH OF CROYDON (REGINA ROAD) COMPULSORY
PURCHASE ORDER 2026**

CORE DOCUMENTS BUNDLE

PINS REF:

CORE DOCUMENTS BUNDLE INDEX

Doc No.	Document	Date
A – Key Order Documents		
1.	CPO Order	
2.	CPO Map	
3.	Consultation Response	
4.	Landlord Offer	
5.	Phasing Plan	
6.	Pre-demolition audit	
7.	GLA Grant Funding Agreement	4 March 2025
8.	OPE BLRF Grant Funding Agreement	10 September 2024
9.	Savills Financial Viability Assessment	June 2025
10.	Protected Assets Certificate	
11.	Equalities Impact Assessment	
B – Policy and Guidance Documents		
1.	Guidance on Compulsory Purchase Process	Updated January 2025
2.	Residents Charter	
3.	Housing Transformation Programme	
4.	Housing Strategy	
5.	Croydon Local Plan	2018
6.	London Plan – accessible online	2021
7.	National Planning Policy Framework – accessible online	2023
8.	National Planning Policy Guidance – accessible online	2014
9.	Draft Croydon Local Plan Revised (Regulation 19)	2024
C - Correspondence		
1.		
D – Legislation		
1.	Section 226 of the Town and Country Planning Act 1990	

2.	Section 12 and 19 of the Acquisition of Land Act 1981	
3.	Sections 16 of the Local Government (Miscellaneous Provisions) Act 1976	
4.	Section 203 of the Housing and Planning Act 2016	
5.	Section 6 of the Human Rights Act 1998	
6.	Articles 1, 6 and 8 of the first protocol of the European Convention on Human Rights	
7.	Section 149 of the Equality Act 2010	
8.	Section 122(2) of the Local Government Act 1972	
E – Cabinet Reports		
1.	Cabinet Decision – 16 November 2022 – Key Decision: 5122 EM	16 November 2022
2.	Cabinet Decision – 22 March 2023 – Key Decision: 8622 EM	22 March 2023
3.	Cabinet Decision – 26 July 2023 – Key Decision: 3823EM	26 July 2023
F – Permissions & Consents		
1.	Delegated Decision	16 March 2026
2.	Planning Permission Decision Notice	12 January 2026
3.	Non-Material Amendment Decision Notice	11 February 2026
G - Notices		
1.	Initial Demolition Notices – 89-123 Regina Road	29 October 2024
2.	Personal Notice	2 April 2026
3.	Site Notice	2 April 2026
4.	Newspaper Notice	2 April 2026
5.	Website Notice	2 April 2026
H – Correspondence with ‘Objectors’		
1.		
I – Title documents		
1.	Title Register SGL209762	
2.	Title Register SY75687	
3.	Title Register SGL790846	
4.	Title Register SGL613937	
5.	Title Register SGL568829	
6.	Title Register SGL331287	