

**THE LONDON BOROUGH OF ENFIELD
(ALMA ESTATE REGENERATION)
COMPULSORY PURCHASE ORDER 2016**

STATEMENT OF REASONS

**London Borough of Enfield
Housing Development & Renewal
Regeneration & Environment
Civic Centre
Silver Street
London
EN1 3XA**

1. Introduction

- 1.1 The London Borough of Enfield (“The Council”) intends to make the London Borough of Enfield (Alma Estate Regeneration) Compulsory Purchase Order 2016 (“the Order”). The Order will be prepared following the decisions of the Council’s Cabinet to use CPO powers on 22nd January 2014 and 10th December 2014.
- 1.2 The Council intends to make the Order under section 226 (1)(a) of the Town & Country Planning Act 1990 (“the 1990 Act”) as amended, the Council being satisfied that that the proposed acquisition will facilitate carrying out the development/redevelopment or improvement on or in relation to the Order Land. The Council is satisfied that the Order will satisfy the test in section 226 (1A) by contributing to the achievement of the objectives of promotion or improvement of the economic, social and environmental well-being of their area.
- 1.3 The Council intends to make the Order with the intention of acquiring the outstanding interests required to enable implementation of the proposed scheme, thereby to achieve the Council’s adopted policy objectives and also to acquire a ‘clean’ title to the land of which the Council is already the freehold owner.
- 1.4 The parcels of land to be acquired compulsorily will be identified in the Schedule to the Order, which will list the owners, lessees, occupiers and tenants of the Order Properties. In addition it will also list other parties with a qualifying interest in the Order Properties where known. Where beneficiaries of these interests are identified they will be served with notice of the making of the Order. It is intended that, unless properties and/or land can be acquired by private negotiations, the Council shall acquire them under the Order if confirmed. Discussions will however continue with the owners of relevant interests who are willing to sell by agreement, with a view to limiting the number of interests which need to be acquired compulsorily. The approach adopted by the Council accords with the advice contained in Guidance on Compulsory purchase process and the Crichel Down rules (October 2015).
- 1.5 This Statement of Reasons is a non-statutory document and it is provided in line with the advice in the October 2015 Guidance. . It sets out the Council’s justification for the making of the Order and why the powers of compulsory purchase contained in the Order are necessary and sets out why there is a compelling case in the public interest for making the Order. It also justifies the interference with the human rights of those with an interest in the land

affected.. It is considered that the statutory tests are met and there is a clear and compelling case in the public interest for making and confirmation of the Order as set out, in this Statement of Reasons.

- 1.6 The Order will be submitted to the Secretary of State for Communities and Local Government (the “Secretary of State”) for confirmation pursuant to the Acquisition of Land Act 1981. Objections can be made to the Secretary of State in accordance with the details set out in the Notice of Making the Order. Provided that the Order is confirmed by the Secretary of State, the Council will execute General Vesting Declarations, the result will be to vest the Order Land in the Council.
- 1.7 This Statement is not intended to constitute the Council’s Statement of Case for the purposes of the Compulsory Purchase (Inquiries Procedure) Rules 2007.

2. Background

- 2.1 The land proposed to be compulsorily acquired and used under the Order (“the Order Land”) covers an area of land located in the ward of Ponders End, in the north east of the borough. The Order Land, described in more detail in Section 3, is shown, coloured pink on the Order Map at Appendix 1.
- 2.2 The Scheme includes the demolition of all of the properties within the Order Land and the comprehensive redevelopment of the Alma Estate to provide 993 new homes, shops, and other community facilities. The outline planning application for the entire development and the detailed planning application for Phase 1 of the Scheme have now received a favourable determination at Planning Committee.
- 2.3 The authority’s purpose in seeking to acquire the land is to facilitate the comprehensive and fundamental redevelopment and regeneration of the Alma Estate.
- 2.4 The Estate consists of Council-owned and managed blocks of flats occupied by Council tenants, and leaseholders. The Estate has many strengths, not least its community spirit, but has suffered from under investment in the past that has resulted in an Estate that is generally in poor condition offering homes below the standard that the Council would like its tenants to be living in.

- 2.5 The regeneration programme for the Estate will respond to the significant opportunities provided by the Estate's geographical position and its access to nearby transport links, and, embracing the strong sense of community, will seek to transform the area both physically and economically into a vibrant and sustainable neighbourhood.
- 2.6 The objective is a high quality urban environment with residential neighbourhoods that mix housing types, tenures, and different income groups. The new development will provide a higher density and overall increase of housing accommodation and other non-residential facilities than currently prevails and in this context will achieve:
- 2.6.1 replacement homes for existing Council tenants;
 - 2.6.2 the provision of intermediate affordable housing for shared ownership sale;
 - 2.6.3 a balance of housing for outright sale;
 - 2.6.4 replacement retail units;
 - 2.6.5 replacement community facilities;
 - 2.6.6 significantly improved landscaping and public areas;
 - 2.6.7 integration with the surrounding area;
 - 2.6.8 affordable and green energy supplies for all occupiers on the new Estate
- 2.7 The benefits set out above taken together do, in the Council's opinion, greatly add to the economic, social and environmental well being of the area and the Estate.
- 2.8 Tenants who want to move into new homes on the Estate will be offered homes that are appropriate for their household needs.

- 2.9 The proposals for the Alma Estate Regeneration, authorised by the Council's Cabinet in July 2012 (Key Decision reference: 3510) initially included the demolition of 717 existing residential dwellings comprising of tenanted and leasehold units, and 12 commercial units, on land held within the Council's Housing Revenue Account. Following more detailed design proposals for the comprehensive redevelopment of the site the proposed Order Land now includes 746 existing residential units and 12 commercial units that the Council's Cabinet authorised in December 2014 to be included as part of the Alma Regeneration Programme.
- 2.10 The Council's purpose in seeking to acquire the Order Land is to facilitate the comprehensive redevelopment of the Alma Estate to achieve the delivery of a new mixed tenure neighbourhood ("**the Scheme**"). The Council is of the view that the comprehensive physical regeneration of the Order Land is the most sustainable long term solution for the area in economic, social and environmental terms.
- 2.11 The Council thinks that the acquisition of the Order Land will facilitate the Scheme as well as bringing significant improvement and community benefit on the Order Land. Furthermore, the Council believes that the proposed redevelopment is likely to contribute to achieving the improvement of the economic, social and environmental well-being of the area for which it has administrative responsibility.
- 2.12 In order to secure the implementation of the Scheme, the Council has agreed to work in partnership with Countryside Properties, with whom the Council has entered into a development agreement signed on 13th November 2014. In summary, the scheme will provide for the redevelopment of the area and deliver approximately 993 new homes, new replacement retail space, a new GP centre, a community centre, an affordable gym and significantly improved open space, public realm and new streets that better integrate the new development into the surrounding area. Further detail about the scheme is included under Section 4.
- 2.13 Ponders End is the third most deprived ward in the borough and continues to be one of the Council's priority areas for regeneration. The Lower Super Output Area (Enfield 014D) in which much of the Alma Estate lies, including all of the high rise towers, is ranked 2,326 out of 34,753, under the Indices of Multiple Deprivation from the ONS Census 2011, making it amongst the most deprived 6.7% of LSOAs in England and Wales.
- 2.14 The Alma Regeneration programme is one of Enfield Council's flagship physical interventions that can act as a catalyst for further regeneration and

inward investment in the area. Furthermore, the new development will see the replacement of an existing housing estate which suffers from structural problems, is costly to maintain and would be expensive to bring back to a good standard.

- 2.15 The comprehensive redevelopment of the Alma Estate provides an opportunity for a transformative improvement of both the buildings in the area and the lives of the residents living and working in the area. This in the Council's opinion provides a compelling case for the making of the Order.
- 2.16 Further commentary on the enabling power is set out in Section 7 of this Statement of Reasons.

3. Description of the Order Land

- 3.1 The Order Land lies within the ward of Ponders End in the north east of the London Borough of Enfield, and totals 7.76 hectares. It is bound by South Street/Woodall Road to the south, Scotland Green Road to the west, Scotland Green Road North to the north, and the West Anglia Main Line railway to the east. Ponders End Railway Station lies immediately adjacent to the south-eastern corner of the Order Land.
- 3.2 The Order Land comprises predominantly residential land use with some leisure and commercial uses, as well as public open space. Although the London Borough of Enfield owns a majority of the site, there are a number of long leasehold and freehold interests which need to be acquired to enable realisation of the Scheme (as described in Section 4).
- 3.3 Interests within the Order Land are listed below:

Residential Interests

- 3.4 The Alma Estate consists of four high rise tower blocks, and a number of low rise maisonette and flatted blocks. The four high rise tower blocks, which are located off Napier Road and running east to west are; Kestrel House, Cormorant House, Merlin House and Curlew House, and each of these are twenty three storeys and are all constructed of precast reinforced concrete (PRC) large panel system (LPS). The low rise maisonette and flatted blocks are located to the east of Alma Road, above commercial premises on South Street, on Fairfield Close and to the south-east of Scotland Green Road and are all traditional masonry and brick built structures.

3.5 The residential interests within the Order Land include 746 properties in total of which the vast majority are either Council owned or leasehold, having been sold under the Right to Buy. There are a number of issues which impact significantly on the quality of life for the residents of the Alma Estate and those living in adjoining properties. Properties in the high rise blocks suffer from leaks from numerous sources as well as inadequate heating while the low rise blocks included within the Order Land are in a poor state of repair

3.6 In more detail, the interests are:

- 15-107a Alma Road (odds)
- 63 Alma Road (no. 1 to 9)
- 11 to 226 Kestrel House
- 11 to 226 Cormorant House
- 11 to 226 Merlin House
- 11 to 226 Curlew House
- 118 to 142 South Street
- Land at 129-141 South Street
- 171a South Street (including 1-16 Silver Birch Court)
- 173 South Street
- 11 to 89 Napier Road (odds)
- 1 to 34 Fairfield Close
- 5 to 9 Scotland Green Road (odds)
- 21 to 43 Scotland Green Road (odds)
- 45 Scotland Green Road

3.7 The land at 171a South Street includes Silver Birch Court, which is a 1990s built flatted residential block comprising of 16 dwellings, and accessed from Woodall Road. The land at 173 South Street, which was formerly the site of the Railway Hotel, has been unused since 2007. The site has a prominent location next to Ponders End station and sits opposite Kestrel House. The site has been hoarded since being demolished but remains an eyesore for the local community.

Commercial and Non-Residential Interests

3.8 The Order Land includes a row of twelve commercial premises along South Street.

- 98a South Street; currently occupied by Lloyds Pharmacy on a secure lease.
- 98 South Street; currently occupied by the Valley Wash Tub and on a lease now expired.

- 100 South Street; currently occupied by the Alma Residents Association on a licence.
- 102 South Street; currently occupied by the Oasis Academy on a contracted out lease.
- 104 South Street; currently occupied by Bengal Stores on a secure lease.
- 106 South Street; currently occupied by Bangladeshi Welfare Association on a licence.
- 108a South Street; currently occupied by Premier Café on a secure lease.
- 108 South Street; currently occupied by Enfield Jobs.net on a licence.
- 110 South Street; currently occupied by Greggs on a secure lease.
- 112 South Street; currently occupied by Gingers News on a secure lease, and includes 126 South Street which is a flat above 112 South Street.
- 114 South Street; currently occupied by Britannia Fish Bar which is on a secure lease.
- 116/116a South Street; currently occupied by Enfield Mini Market which is on a secure lease.

3.9 The land at 129-141 South Street “Community Facility Land”, inclusive of the Welcome Point Centre, Ponders End Youth Centre and MUGA is owned by the Council but is included within the Compulsory Purchase Order to ensure that any unknown interests are acquired.

3.10 Collectively, the privately owned land at 171a and 173 South Street has been subject to a planning application (P12-02112PLA) dated 3rd August 2012 from the landowner, Longwood Properties London Limited, which at the time of writing has yet to be determined. This application is not part of the Scheme as described. It is the Council’s opinion that this planning application could not be implemented as the applicant does not own all of the land interests and it would require the agreement of the Council, as landowner, to enable implementation of this development. The planning application proposes the external refurbishment of Silver Birch Court and redevelopment of the remainder of the site to provide;

- a total of 50 self-contained residential units
- 2 retail units with basement car parking (56 spaces)
- erection of a part 6, part 7-storey block (Block A) of 20 flats (5 x 1-bed, 12 x 2-bed, 3 x 3-bed) and 5 x 3-bed maisonettes fronting South Street with 2 retail units to ground floor level
- erection of a part 3, part 5-storey block (Block B) of 20 flats (6 x 1-bed, 10 x 2-bed, 4 x 3-bed) and 5 x 3-bed maisonettes with amenity space at roof level fronting Woodall Road

Public Open Space

- 3.11 The Order land contains pockets of amenity space. There are two dedicated children's play spaces located between Curlew House, South Street and Merlin House, and also immediately north of Kestrel House.
- 3.12 The Scheme provides amenity space of at least the same area, and when completed the amenity space will be much improved to encourage greater use by residents in the locality.

Road Network and Transport Infrastructure

- 3.13 There are a number of district roads that serve the existing properties within the Order Land. All of these roads are part of Enfield Council's adopted highway.
- 3.14 Public Right of Way Route 318 runs north-south from Napier Road to South Street.
- 3.15 Roads and footpaths will need to be stopped up as part of the construction.

Statutory Undertakers / Utility Service Providers

- 3.16 There are a number of utilities running through the site, including water, telecommunications and electricity. There are also a number of telecommunications installations on some of the tower blocks within the Order Land.
- 3.17 The Order Land includes a total of four electricity sub-stations. Full details of the Order Land appears in the Schedule to the Order (and is summarised in Appendix A and the Order Maps Appendix B). All utility operators with known equipment in the Order Land will be given notice of the making of the Order.
- 3.18 The Order Scheme takes account of the apparatus of Statutory Undertakers and where affected by the Order Scheme, discussions will be held with the relevant Statutory Undertakers and alternative arrangements will be made.

4. The Scheme

- 4.1 The Scheme to which the Order relates is being promoted by the Council, which selected Countryside Properties (UK) Limited as its developer partner in September 2013 after carrying out an OJEU (Official Journal of the

European Union) compliant competitive dialogue procurement process. This culminated in the Council and Countryside signing a Development Agreement on 13th November 2014. The intensive competitive dialogue process helped the Council to negotiate the most competitive proposal and Countryside Properties are best able to satisfy the Council's requirements across a number of areas; financial, qualitative and legal. The involvement of Countryside as developer partner ensures that the necessary resources will be available to implement the Scheme within a reasonable timescale. The qualitative evaluation tested the design quality, and compliance with planning policy.

- 4.2 Both the Council and Countryside have committed and will continue to commit the necessary funding to the Scheme to enable the obtaining of vacant possession and the comprehensive redevelopment of the new properties.
- 4.3 Countryside Properties and the Council have since been working in partnership to progress the design proposals for the scheme. The Scheme involves the demolition and redevelopment of the Order Land to facilitate the comprehensive regeneration of this part of Ponders End. The Council considers that all of the Order Land is required to deliver the Scheme and that the Scheme is not capable of being brought forward otherwise. This Order is necessary because there is no certainty that all interests can be acquired by negotiation.
- 4.4 Countryside Properties have proposed a scheme as part of their outline planning application for the redevelopment of the Alma Estate which will include the delivery of 993 new residential units. Outline consent for the entire scheme has now been granted by the Council. Complete phased redevelopment will provide a new mixed tenure, residential led scheme, with new community facilities including a GP centre, affordable Gym, and replacement retail floor space.
- 4.5 The Scheme will include:
 - The demolition of all 746 residential properties within the Order Land
 - The construction of 993 new homes, for private sale, shared ownership and council social rent.
 - The demolition of existing retail space and creation of new replacement retail space.
 - The creation of new uses for leisure, and healthcare provision.

4.6 In more detail the entirety of the development will comprise:

Use	Maximum Floorspace (GIA)
Residential (Use Class C3)	In excess of 15,000 m2 or circa 993 units
Flexible Retail (Use Class A1-A3) & 80 sqm (A2/B1/D1/D2)	Up to 866 m2
Non-residential institution (Use Class D1)	Up to 2043 m2
Non-residential (Use Class D2)	Up to 769 m2

4.7 Within the Development Agreement, there is a shared aspiration to deliver 41% of the new homes on the new Alma Development as affordable homes (incorporating both homes at social rent, homes at affordable rent and shared ownership properties). Of the 41% a minimum of 200 Enfield Council owned social rented homes with secure tenancies are to be provided. The remainder of the 41% affordable housing provision will be a mix of homes at affordable rent and shared ownership properties, totalling 199 properties.

Retail Uses

4.8 The new retail units will have frontages on South Street and a new square as part of significant public realm improvements that will link Ponders End Station to South Street and the new development.

Non-residential Uses

4.9 It is intended that part of the non-residential space will be used as a GP Surgery to serve the Ponders End community.

4.10 It is intended that part of the non-residential space will be used for an affordable gym, provided on the first floor with an entrance and reception on the ground floor thus creating a frontage on the newly designed Station Square.

Phasing Plan (New Build)

4.11 The Phasing Plan for the new development groups the parcels of land and blocks into the following phases:

- Phase 1 Kestrel House, and Alma Road (15-45a odds) The detailed planning application for this phase has been determined at Planning Committee.
- Phase 2a: Cormorant House, Merlin House, South Street (171a-173), including 1-16 Silver Birch Court, and South Street (129-141)
- Phase 2b: Curlew House, South Street (98-140, including maisonettes and shops), Scotland Green Road (5-9 and 45)
- Phase 3: Napier Road (7-89) & Alma Road (47-107 odds) Alma Road (63, numbers 1-9)
- Phase 4: Fairfield Close (1-34)

Timescales for delivery of the Scheme:

- 4.12 The projected timescales for delivery of the scheme are broken down by each phase as follows, assuming that the Council is able to make the CPO:

Milestone	Date
Submission of outline planning application for the development of all phases, and submission of a detailed planning application for Phase 1	Spring 2015
Approval of the outline planning application and Phase 1 detailed planning application (including GLA approval)	Determined September 2015
Commence demolition of existing properties in Phase 1	Summer 2016
Commence construction of Phase 1	Early 2017
Completion of Phase 1 homes	Late 2019
Entire scheme completed	2023

5. Planning Considerations

- 5.1 Relevant national planning policy, Development Plan policies and other policy documents which are material considerations are set out below.

National Planning Policy - National Planning Policy Framework (“NPPF”)

The NPPF (March 2012) sets out the Government’s policies on planning and how these are expected to be applied. The NPPF makes it clear that the purpose of the planning system is to contribute to the achievement of sustainable development and that there are three dimensions to sustainable development: economic, social and environmental. The NPPF sets out 12 core land-use principles and one of these is that planning should proactively drive and support sustainable economic development to deliver the homes, businesses, infrastructure and thriving local places that the country needs.

With regard to the Order Scheme, the approach taken by the Council to promote the regeneration of this area already embodies the thinking regarding sustainable development in the NPPF in terms of the emphasis on urban regeneration and the efficient re-use of previously developed land in order to create sustainable development in line with economic, social and environmental objectives to improve people’s quality of life. The emphasis on community involvement; creating a sustainable community in a high quality, safe and healthy local environment where people want to live; contributing to the promotion of urban renaissance and improvement of quality of life and access to jobs; building a socially inclusive community with a mix of housing; and improving the link between land use and transport are all in line with these proposals.

The Statutory Development Plan, and related policy and guidance documents

- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.3 The development plan for this area comprises the London Plan (March 2015) the adopted Enfield Core Strategy (2010), the Development Management Document (DMD) (2014) and the North East Enfield Area Action Plan (2014) is currently at examination stage. Upon adoption, anticipated for summer 2016, the NEEAAP will form part of the development plan for the area.
- 5.4 Other material considerations of a policy nature include relevant SPDs adopted by the local planning authority, the London Plan Supplementary Planning Guidance (SPGs), the National Planning Practice Guidance, emerging Local Plan documents such as the Development Management Document (2014), and other evidence base documents as relevant.

The London Plan

The Mayor’s revised London Plan was formally adopted in March 2015 and provides for strategic spatial strategy within Greater London. The Plan sets out a number of objectives to optimise the potential of development sites; make the most

sustainable and efficient use of land, particularly in areas of good public transport; improve the quality of life; deliver high quality new homes; mitigate and adapt to climate change and secure a more attractive, well designed green city.

Policy 2.3 of the London Plan refers to “growth areas” that have been identified on the basis that they are capable of accommodating substantial numbers of new homes and employment and seeks to ensure the area’s potential is optimised. In terms of planning decisions it is envisaged that development proposals advanced in such areas should:

- Support the strategic policy directions for the growth areas;
- Seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and where appropriate, contain a mix of uses;
- Contribute towards meeting the minimum guidelines for housing and/or indicative employment numbers;
- Realise scope for intensification associated with existing or proposed improvements in public transport..... make best use of existing infrastructure and to promote inclusive access including cycling and walking; and
- Support wider regeneration (including in particular improvement to environmental quality) and integrate development proposals to surrounding areas especially areas of regeneration.

The Upper Lee Valley is identified in London Plan Policy 2.13 supported by London Plan Annex One, as an opportunity area. The adopted Upper Lee Valley Opportunity Area Planning Framework (July 2013) identifies Ponders End as a “growth area” and an opportunity for new job creation and new homes. The framework identifies the Ponders End area as contributing up to 1100 new homes and 700 new jobs by 2031.

5.5 The following London Plan policies have relevance to the development for which this CPO is necessary:-

- Policy 2.6 - Outer London: vision and strategy
- Policy 2.7 - Outer London: economy
- Policy 2.8 - Outer London: transport
- Policy 2.14 - Areas for regeneration
- Policy 3.1 - Ensuring equal life chances for all
- Policy 3.2 - Improving health and addressing health inequalities
- Policy 3.3 - Increasing housing supply
- Policy 3.4 - Optimising housing potential
- Policy 3.5 - Quality and design of housing developments
- Policy 3.6 - Children and young people's play and informal recreation facilities
- Policy 3.7 - Large residential developments
- Policy 3.8 - Housing choice
- Policy 3.9 - Mixed and balanced communities
- Policy 3.11 - Affordable housing targets
- Policy 3.14 - Existing housing
- Policy 3.16 - Protection and enhancement of social infrastructure
- Policy 4.1 - Developing London's economy

Policy 4.12 - Improving opportunities for all
 Policy 5.1 - Climate change mitigation
 Policy 5.2 - Minimising carbon dioxide emissions
 Policy 5.3 - Sustainable design and construction
 Policy 5.5 - Decentralised energy networks
 Policy 5.6 - Decentralised energy in development proposals
 Policy 5.7 - Renewable energy
 Policy 5.9 - Overheating and cooling
 Policy 5.10 - Urban greening
 Policy 5.11 - Green roofs and development site environs
 Policy 5.12 - Flood risk management
 Policy 5.13 - Sustainable drainage
 Policy 5.15 - Water use and supplies
 Policy 5.18 - Construction, excavation and demolition waste
 Policy 5.21 - Contaminated land
 Policy 6.9 - Cycling
 Policy 6.10 - Walking
 Policy 6.12 - Road network capacity
 Policy 6.13 - Parking
 Policy 7.1 – Lifetime Neighbourhoods
 Policy 7.2 - An inclusive environment
 Policy 7.3 - Designing out crime
 Policy 7.4 - Local character
 Policy 7.5 - Public realm
 Policy 7.6 - Architecture
 Policy 7.7 - Location and design of tall and large buildings
 Policy 7.14 - Improving air quality
 Policy 7.15 - Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
 Policy 7.18 - Protecting local open space and addressing deficiency
 Policy 7.19 - Biodiversity and access to nature
 Policy 7.21 - Trees and woodlands

5.6 The Greater London Authority (GLA) have issued a Stage 1 response to the Phase 1 detailed planning application and the full outline planning application. The principle of the comprehensive redevelopment is supported in strategic planning terms.

Enfield Core Strategy

5.7 The Enfield's Core Strategy was adopted in November 2010. The Core Strategy sets out the spatial planning framework for the long term development of the borough for the next 15-20 years. Paragraph 9.35 states that Ponders End is seen as an area with considerable potential, "...given its location so close to the Lea Valley Regional Park, strong transport routes including Southbury and Ponders End railway stations and Picket Lock to the south". The Core Strategy explains that the development of the key opportunity sites in Ponders End and particularly the former gasholder site within the South Street area is a Council priority.

- 5.8 **Core Policy 4** sets out the policy for New Housing and Housing Renewal in Enfield and refers to the Estates Investment Management Strategy which was undertaken to inform the future management and priorities for investment across the Council's own housing stock. As part of this strategy, the Alma Estate scored highest in an objective exercise to identify the Council's next housing estate renewal scheme.
- 5.9 **Core Policy 5** sets out the policy for Housing Types. The housing mix for the scheme is not compliant with the Council's Core Strategy however there is a justification for deviating from this which was put forward and accepted as part of the planning application for outline consent for the entire Scheme.
- 5.10 The bedroom mix for Enfield Council's homes for the Alma development scheme has been based on the housing need of the existing secure council tenants that remain on the estate, and in addition, the mix has been fine tuned to achieve a Council objective of the scheme which was to maintain the same number of 56 family sized homes (three and four bedroom dwellings). In addition, the Council has ensured that a nearby but separate development, at Dujardin Mews provides a high proportion of family housing of larger 3-bed plus units, as the Alma scheme is more suited to higher density flatted accommodation. The mix has also been informed by the needs of the Alma Estate decant needs. The estate currently accommodates a significant number of 3-bed leasehold properties (113 in total) and many of the existing tenanted 1 and 2 bedroom properties within the estate are overcrowded, and therefore the provision of a significant number of 3 and 4-bed units within the Dujardin Mews Development will offer these families the opportunity to move into accommodation which better meets their needs. Housing need has been redefined by the new Local Lettings Plan , a plan that will regulate the letting of tenancies on the new development, and it will;
- make adult children from the age of eighteen in households, eligible for their own bedroom
 - reduce the eligible age for different gender children to have separate bedrooms, from the age of ten as per the current Enfield Council Allocations Scheme, to the age of seven
 - allow children of the same gender, under the age of eighteen but with a seven year age gap, to have an extra bedroom.
- 5.11 The housing need for the estate without consideration of the new Local Lettings Plan was for just 11% three and four bedroom units. With the Local Lettings Plan creating additional demand for family sized units, and the adjustment to ensure no loss of the 56 family units, the housing need for three and four beds has been revised upwards to 28%, which is still significantly below the Core Strategy policy target of 60% family sized units. The most recent Strategic Housing Market Assessment from 2008

identified that for social housing, the shortfall is greatest for two-bedroom dwellings in the borough. The proposed mix for the council homes on the Alma development has a higher proportion of two bedroom dwellings than other bedroom sizes.

- 5.12 **Core Policy 9** supports area based policy interventions relating to the place shaping agenda which seek to tackle social disadvantage;
- 5.13 **Core Policy 40** outlines that in the North East Enfield Area, there is scope to develop 1000 new homes (net). The focus for change and development, and hence the majority of these new homes, will be in Ponders End. In the middle (of Ponders End), along South Street, there are opportunities at the gasholder site on South Street, around Ponders End railway station, and at Alma Estate. This collection of sites is referred to as "Ponders End South Street Campus".
- 5.14 **Core Policy 41** explains that the objectives of new development in Ponders End will be to create up to 1,000 net new homes up to 2026, with a range of sizes and tenures, including affordable homes. The Alma Regeneration scheme is fundamental in contributing to a net increase in the number of homes in the area.

Other relevant policies include:

Core Policy 1 – Strategic growth areas

- Core Policy 2 – Housing supply and locations for new homes
- Core Policy 3 – Affordable Housing
- Core Policy 7 – Health and social care facilities and the wider determinants of health.
- Core Policy 11 – Recreation, leisure, culture and arts.
- Core Policy 13 – Promoting economic prosperity
- Core Policy 16 – Taking part in economic success and improving skills

Core Policy 18 – Delivering shopping provision across Enfield

- Core Policy 20 – Sustainable energy use and energy infrastructure
- Core Policy 21 – Delivering sustainable water supply, drainage and sewerage infrastructure
- Core Policy 22 – Delivering sustainable waste management
- Core Policy 24 – The road network

- Core Policy 25 – Pedestrians and cyclists
- Core Policy 26 – Public transport
- Core Policy 28 – Managing Flood Risk through development
- Core Policy 30 – Maintaining and improving the quality of the built and open environment
- Core Policy 32 – Pollution
- Core Policy 34 – Parks, playing fields and other open spaces
- Core Policy 35 – Lee Valley Regional Park and waterways
- Core Policy 36 – Biodiversity
- Core Policy 46 – Infrastructure contributions

Proposed Submission North East Enfield Area Action Plan (NEEAAP) (2014)

5.15 The NEEAAP is currently under examination and the Inspector's report is programmed to be published in Summer 2016.

This document sets out the Council's approach towards regeneration in North East Enfield. The spatial strategy contained within the document is underpinned by a number of key objectives, including to plan for growth and change; to create sustainable neighbourhoods; to increase the capacity of existing employment land and improve access; to protect, enhance and improve the natural environment; to ensure everyone has access to high quality health, leisure and community facilities and to improve overall accessibility and connectivity.

5.16 The Alma Estate regeneration is a key site identified within the document. Policy 11.2 sets out the approach to regeneration of the Alma Estate should;

- provide a minimum replacement of the existing 717 new homes, of which a minimum of 40% are affordable;
- provide a mix of dwelling types, including homes for families;
- provide a new health centre on the South Street frontage;
- locate any commercial mixed-uses (which may be retail (A1, A3) and leisure (D2) on the South Street frontage close to the station; and
- achieve Building for Life 'Gold' standard;

Other relevant policies include:

- Policy 4.1 – Encouraging Modal Shift
- Policy 4.2 – Improving the Quality of the Pedestrian and Cycling Environment
- Policy 5.1 – Affordable Housing

- Policy 5.2 – Mix of housing types
- Policy 5.3 – Improving the public realm
- Policy 7.1 – Providing community facilities
- Policy 8.1 – Enhancing existing open spaces
- Policy 8.2 – Providing new open space
- Policy 8.3 – Joining green spaces together
- Policy 9.1 – Sustainable Energy
- Policy 11.1 – South Street Area
- Policy 11.2 – Alma Estate regeneration
- Policy 11.3 – Ponders End station

Development Management Document (DMD) (2014)

- DMD 1 – Affordable Housing on sites capable of providing 10 units or more
- DMD 3 – Providing a mix of different sized homes
- DMD 4 – Loss of existing residential units
- DMD 6 – Residential character
- DMD 8 – General standards of new residential development
- DMD 9 – Amenity space
- DMD 10 – Distancing
- DMD 16 – Provision of new community facilities
- DMD 17 – Protection of community facilities
- DMD 25 – Locations for new retail, leisure and office development
- DMD 28 – Large Local Centres, Small Local Centres and Local Parades
- DMD 29 – Individual shops and small clusters of shops
- DMD 32 – Managing the impact of food and drink establishments
- DMD 34 – Evening economy
- DMD 37 – Achieving high quality and design-led development
- DMD 38 – Design process
- DMD 39 – The design of business premises
- DMD 40 – Ground floor frontages
- DMD 43 – Tall buildings
- DMD 45 – Parking standards and layout
- DMD 47 – Access, new roads and servicing
- DMD 48 – Transport Assessments and Travel Plans
- DMD 49 – Sustainable Design and Construction Statements
- DMD 50 – Environmental Assessment Methods
- DMD 51 – Energy Efficiency Standards
- DMD 52 – Decentralised Energy Networks
- DMD 53 – Low and Zero Carbon Technology
- DMD 54 – Allowable solutions
- DMD 55 – Use of roof space/ vertical surfaces
- DMD 56 – Heating and cooling
- DMD 57 – Responsible sourcing of materials, waste minimisation and green procurement
- DMD 58 – Water efficiency
- DMD 59 – Avoiding and reducing flood risk
- DMD 60 – Assessing flood risk
- DMD 61 – Managing surface water

- DMD 62 – Flood control and mitigation measures
- DMD 64 – Pollution control and assessment
- DMD 65 – Air quality
- DMD 66 – Land contamination and instability
- DMD 68 – Noise
- DMD 69 – Light pollution
- DMD 70 – Water quality
- DMD 71 – Protection and enhancement of open space
- DMD 72 – Open space provision
- DMD 73 – Children’s play space
- DMD 74 – Playing pitches
- DMD 77 – Green chains
- DMD 78 – Nature conservation
- DMD 79 – Ecological enhancements
- DMD 80 – Trees
- DMD 81 – Landscaping
- Appendix 3 – Sustainable Design and Construction Statements
- Appendix 4 – Housing
- Appendix 5 – Commercial opening hours
- Appendix 7 – London Plan Car Parking and Cycle Standards
- Appendix 8 – Parking Standards
- Appendix 10 – Flood Risk Assessments
- Appendix 11 – Air Quality
- Appendix 13 – Market Demand and Viability Assessments

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5.17 Support for the Scheme, and compliance with the Council’s planning policies has been demonstrated by the Planning Committee’s decisions to favourably determine both the outline planning application for the development of the Order Land and the full planning application for Phase 1 of the Scheme.

Other London Borough of Enfield Policies

- Community Strategy

5.18 The Council's purpose in making the Order is to achieve the key community priorities as set out in the Council's Community Strategy:

5.18.1 The Council's vision for the borough is for a healthy, prosperous and cohesive society that is safe, clean and green.

5.18.2 The Council is committed to improving the quality of life through: Employment and Enterprise; Environment; Housing; Leisure and Culture:

(a) The development will be promoted to produce the highest quality architectural and urban environment.

(b) Improving health, housing and social care - This will be achieved by the

new development supplying higher quality social housing stock in line with the Decent Homes Standard, as defined by the Department for Communities and Local Government. The redevelopment will also produce a diversity of tenure which will improve the type and choice of housing in New Southgate.

(c) Safer and stronger Communities:

(i) To implement a place-shaping approach to underpin the creation of a more prosperous borough

(ii) To enhance the health and vitality of town centres to meet the needs of the communities they serve

(iii) To increase the number of new businesses setting up and coming to the area and sustaining their development

(iv) To deliver the housing element of place shaping and achieve sustainable housing growth

(v) To improve housing conditions and prevent homelessness

(vi) To ensure that residents have the opportunity to live in a decent home they can afford

(vii) To protect and improve the quality of built and open environment

(viii) To promote sustainable development and support residents and businesses to preserve natural resources, become energy efficient, conserve water, reduce pollution and address the causes of global warming

(ix) To increase biodiversity in order to provide a local distinctive natural identity

(x) To make Enfield a place which residents can identify with and feel proud of, and where people from different backgrounds feel valued and can develop positive relationships with their local community

(xi) To promote social inclusion so that all sections of the community are able to access opportunities, services and improve their quality of life overview

6. Consultation and Negotiations

Consultation on the Scheme

6.1 Enfield Council has, and continues to positively engage residents on the Alma Estate in relation to the Scheme.

6.2 Formal consultation with Alma residents began in September 2011. An initial Test of Opinion was held to gauge to what extent residents of the Alma estate supported demolishing and rebuilding the estate. Of the 717 households, 64% of households responded and 84% of respondents expressed a preference for demolition. Door knocking, in partnership with Enfield Homes and the Alma Residents Association (“ARA”), was carried out to increase the participation rates.

6.3 The Test of Opinion established that there was support across the estate for a comprehensive regeneration scheme. Following this feedback the Council

organised more consultation sessions to further explore estate regeneration proposals with residents. The initial Test of Opinion was never proposed as offering residents a final say on the future of the estate, the purpose was more to test to what extent support for a more radical intervention existed.

- 6.4 Workshops were held during October 2011 to discuss with residents in particular the existing problems on the estate and how improvements could be made. During November architect firm PRP were jointly selected by the Council and the ARA. PRP prepared a number of design options for the estate and these options were consulted upon during further workshops held in December 2011.
- 6.5 A final Test of Opinion was held in May 2012 to determine whether residents' preference was for a refurbishment or redevelopment scheme. A secondary question sought to determine, if a redevelopment scheme were to proceed, where residents would prefer to be rehoused. The final Test of Opinion was held once an information booklet had been prepared and circulated to tenants and leaseholders, including information on rehousing options, compensation and project timescales. Holding a second Test of Opinion in this way after residents had been properly informed of their choices accords with consultation best practice.
- 6.6 The Independent Tenant and Leaseholder Advisor firm, Strategic Urban Futures (StUF) has confirmed that the Test of Opinion process was carried out in accordance with good practice and they have endorsed the final result.
- 6.7 The final result is comparable to the initial Test of Opinion. The overall response rate achieved was 67% of households and of those that responded 78% expressed a preference for redevelopment, 20% for refurbishment, and 2% did not express a preference. All areas of the estate voted in favour of redevelopment, and there was strong support among both Council tenants and leaseholders.
- 6.8 Council tenants were also asked where they would like to be rehoused; of those that responded 38% wanted to be rehoused elsewhere in the Borough, 37% on the new estate, 13% elsewhere in Ponders End, and 12% did not express a preference. Extrapolation of this data indicates that approximately 220 Council tenanted households are likely to want to be rehoused on the new development. This data has helped inform the future provision of council housing but tenants' preferences will inevitably change during the duration of the programme so the Council has taken an adaptable approach.

- 6.9 Since Countryside Properties were selected as the developer partner for the scheme, they had been working at risk until the Development Agreement was signed, to prepare the outline planning application (masterplan) and detailed Phase 1 planning application. Countryside Properties instructed Pollard Thomas Edwards Architects, and frequent Design Team Meetings have been held between the Council, Countryside Properties, Pollard Thomas Edwards and other consultants as and when required to progress design proposals.
- 6.10 Resident consultation has been fundamental to the progression of the design proposals for the outline planning application and in particular the detailed application for Phase 1. Design Panel Workshops, which have been advertised locally and open to all, have focused around particular themes such as 'your new homes', 'landscape, streets, security & parking' and 'how it might look', have been well attended by local residents and they have had a genuine and positive impact on the detailed design of homes. The internal layouts of individual unit types have been revised directly as a result of resident concerns, including distribution of space, options for open plan or separate kitchens, windows being provided in kitchens/bathrooms in particular unit types, and the gross internal areas. The Council, the developer and the architects have worked collaboratively to find solutions to satisfy residents' concerns and secure their support for the detailed design of new homes.

Negotiations for the Acquisition of Necessary Interests

- 6.11 The Council recognises that acquiring authorities should seek to acquire land by negotiation wherever possible, relying on CPO powers as a last resort. The efforts which the Council has made to acquire the relevant interests on the Alma Estate by negotiation are described below. Given the timescales involved in obtaining a CPO, Guidance recommends that acquiring authorities should seek to complete the CPO process in parallel with negotiations. The Council will continue to negotiate with leaseholders for the purchase of the Order Land, alongside and throughout the CPO process, up to the point of possession should the Order be confirmed.

Negotiations with Residential Interests

The approach to leaseholders is governed by the corporate objective of "Fairness for all" one of the Council's overriding policies for determining how the Council operates. This approach will ensure resident leaseholders are not financially disadvantaged as a consequence of the regeneration and will ensure all leaseholders are treated fairly.

- 6.12 Both resident leaseholders and absentee/investor (non-resident) leaseholders have been contacted individually to initiate negotiations. The Council has sought to offer each residential leaseholder, resident and investor, the full

market value of their property, plus either a 10% 'Basic Loss' additional payment for resident leaseholders or a 7.5% 'Basic Loss' additional payment for investor leaseholders. In addition the Council advises every leaseholder that it will cover the costs of Disturbance Compensation that includes all reasonable disbursements associated with moving and this includes associated legal fees, a valuation survey from an independent RICS Registered Valuer, a homebuyers report/survey for a new property if necessary, as well any re-mortgaging fee and all removal costs.

6.13 Cabinet approved the 'Estate Renewal Leaseholder Framework' in January 2014 (Key Decision No. 3773) which outlines four principles that are applicable to negotiations with residential interests:

- a) When purchasing a property that is comparable, leaseholders should not be financially disadvantaged.
- b) Resident leaseholders should be provided with an opportunity to remain living in the regeneration area.
- c) Resident leaseholders should be provided with a fair choice.
- d) Resident leaseholders should be encouraged to exercise financial responsibility and have access to independent financial advice.

6.14 The Council has promised all secure Council tenants living on the Alma Estate, a new Council home with a secure tenancy on the new Alma development. Based on the test of opinion, and projections from the decant of Phase 1, the Council has forecast that the minimum of 200 Council homes secured within the Development Agreement with Countryside Properties will be enough to meet the demand of secure council tenants that wish to stay on the new Alma development. The Council has an option to acquire a greater number of properties from Countryside Properties should it emerge that a greater than forecast number of secure tenants wish to stay on the new Alma development.

6.15 Secure Council tenants living on the Alma Estate have six re-housing options which are as follows;

- I. Option 1 - Move to a brand new council home (secure tenancy) on the Alma Estate.
- II. Option 2 – A permanent move to a Council or housing association home off the Alma Estate, but still within the London Borough of Enfield;

- III. Option 3 – A permanent move to sheltered housing within the London Borough of Enfield, if eligible.
- IV. Option 4 – A permanent move to a private rented home in the location of your choice
- V. Option 5 – Buy a new property on the redeveloped Alma estate, elsewhere within the borough, or outside Enfield through low cost home ownership schemes e.g. Shared Ownership, Shared Equity.
- VI. Option 6 - Buy a home with the help of funding through the Grant to Vacate scheme. The new home can be outside the London Borough of Enfield.

Negotiations with Non-Residential Interests

- 6.16 All the owners of the non-residential interests in the Order Land have been kept informed of the proposals for development and where applicable offers have been made for the purchase of those interests. Where offers have not been made it is because an alternative means of extinguishing the interest has been agreed.

Negotiations with Statutory Undertakers

- 6.17 All of the statutory undertakers with interests in the Order land have been informed of the proposals for development. It is the Council's intention to enter into undertakings with each of these statutory undertakers.

7. The Enabling Power

- 7.1 The Order is to be made under Section 226(1)(a) of the Town and Country Planning Act 1990, which confers power on the local authority to acquire land compulsorily if it thinks that the acquisition will facilitate the carrying out of development/re-development or improvement on or in relation to the land.
- 7.2 The Council believes that the acquisition of the Order Land is necessary to facilitate the regeneration of the Alma Estate and bring significant community benefit and improvement. Furthermore, the Council considers it necessary to utilise the powers under s226(1) (a) of the Act as set out in the Statement of Reasons.

7.3 The Council is of the view that the proposed regeneration of the Alma Estate is likely to contribute to achieving the improvement of the economic, social and environmental well-being of the area for which it has administrative responsibility.

8. The Justification for Compulsory Purchase

8.1 The London Borough of Enfield (Alma Estate Regeneration) Compulsory Purchase Order 2016 is being made so that the Council has a contingency in place to use CPO powers to assemble the land needed to implement the Alma Estate Regeneration scheme should its efforts to reach agreement with leaseholders fail.

8.2 In this document, the Council has set out all of the information relevant to the Order Land, the Scheme and why there is a compelling case in the public interest for the making of the Order.

8.3 The Council considers that acquisition by the Council of all of the land and interests owned, occupied or otherwise utilised on the Alma Estate is vital to achieving the Scheme. Moreover the land is needed to remove adverse effects from the area which suffers from a stigma associated with poor appearance, poor urban design and poor highway planning. The construction of the estate in the 1960s broke up the original traditional street pattern and urban grain of what had preceded it, and as a result there is a significant amount of ill defined, loose urban space within the Order land which is misused, often for anti-social activities.

8.4 The existing Alma Estate suffers from a sense of being 'cut-off' from its surroundings, with a lack of permeability and passive surveillance which creates a hostile environment, discouraging street activity and pedestrian journeys during certain hours. During consultation with residents, security issues were identified in particular areas, with anecdotal accounts of anti-social behaviour and perceptions of crime and anti-social behaviour. Some of this feedback on security issues with the existing estate has been collated and summarised below.

- The shops are popular with residents however lighting is poor and as a result discourages use during the night and winter months.. There is also a problem with alcoholics and drug addicts. The canopy overhang encourages people to loiter.
- The playground is popular with younger children although in a poor state of repair. There are problems with drug addicts and

alcoholics who gather on the benches and hang around the playground at night.

- The junction of Alma Road and South Street is dangerous when crossing. This is an important route to the bus stop and train station. There is a blind spot and cars go too fast.
- Outside Ponders End Train Station the space is unused, it has poor lights and there is no overlooking so it feels unsafe to some residents. Commuters use the car parking spaces only and nobody uses the benches.
- Articulated lorries take a shortcut down Curzon Road/Napier Road to access the industrial estates around the Lea Valley. Lorries swing over the pavement at the junction, which is especially dangerous.
- Lighting is poor in the courtyards on the maisonette blocks on Alma Road and bags of rubbish are left in communal areas
- There are many problems with the existing car parks including crime, spaces being used by delivery vans and fly tipping (as bins outdoor). New car park areas should be overlooked.

8.5 One of the key objectives of the new Scheme is to create new homes that benefit from the safety and security of traditional street planning, connecting positively to their surroundings and the local community. The new Scheme will adopt Secured By Design Principles to eliminate the above issues, amongst a number of other problems, as far as possible. The new Alma Development will significantly enhance the public realm, integrating with the surrounding urban grain. The new public realm will significantly improve permeability, overlooking, visibility, view channels and exit strategies with the aim of reducing perceived and actual anti-social behaviour and crime.

8.6 The Council considers that it is necessary to utilise its powers under s226(1)(a) of the Act and make the Order for the following reasons:

- a proportion of the Order Land is in third party ownership and/or control and compulsory acquisition is needed to achieve vacant possession of the Order Land as a fall-back position where agreement cannot be reached;
- to acquire a 'clean' title to the land of which the Council is already the freehold owner;
- to enable the Order Land to be redeveloped in a comprehensive manner,
- to give certainty to timescales for redevelopment of the Order Land, and
- to deliver the wider public benefits that the redevelopment of the Order Land will secure.

- The Council thinks that the development/re-development or improvement is very likely to contribute to the achievement of the promotion or improvement of the economic, social and environmental well-being of its area.

Human Rights

- 8.7 The Council, as a public body, is under a duty to consider whether the exercise of its powers interacts with rights protected by the European Convention on Human Rights (the Convention). Section 6 of the Human Rights Act 1998 prohibits public authorities from acting in a way, which is incompatible with those rights. Various Convention rights may be engaged in the process of making and considering the making of the CPO, in particular those under Article 8 of the Convention and Article 1 of the First Protocol to the Convention. It is considered that there are compelling reasons for overriding these provisions.
- 8.8 Article 8(1) protects an individual's right to private and family life, home and correspondence. Interference with these interests can only be justified if it is done in accordance with the law and if it is necessary in the interests of national security, public safety or the economic well-being of the country. It is considered that any interference caused by the making of the Order will be proportionate and is justified when having regard to the public benefit that will arise from the making of the CPO.
- 8.9 Article 1 of the First Protocol provides that every natural or legal person is entitled to the peaceful enjoyment of his possessions, and that no one shall be deprived of those possessions except in the public interest and subject to the conditions provided for by law. Those with interests in the Order Land will be deprived of their property, if the Order is confirmed but this will be done in accordance with the law and in the public interest.
- 8.10 The European Court of Human Rights has recognised in the context of Article 8 that "regard must be had to the fair balance that has to be struck between the competing interests of the individual and of the community as a whole". Any interference with Article 8 rights must be "necessary in a democratic society". In each case the interference with Convention rights must be proportionate. In pursuing a CPO, the Council has to consider carefully the balance to be struck between individual rights and the wider public interest. This balance has been carefully considered.

8.11 The Council has been conscious of the need to strike a balance between the rights of the individuals (including the owners of properties falling within the Order Land) and the interests of the public. In light of the significant public benefit that would arise from the redevelopment of the Order Land, the Council has concluded that it would be appropriate to make the Order, and that the Order will not result in any unlawful interference with Convention rights. At all times, the Council has been aware that the Order Land includes people's homes, balancing this with the need to secure the regeneration of this area and the provision of new houses.

8.12 The opportunity has been given to landowners to make representations regarding the Council's policies that underpin the Order. Objections can also be made to the Order, which will then have to be considered by the Secretary of State before he decides whether or not to confirm the Order. It is therefore considered that the statutory procedures which give the right to object and provide for judicial review are sufficient to satisfy. Furthermore, those directly affected by the Order will also be entitled to appropriate compensation proportionate to any losses that they may incur under relevant statutory provisions.

9. Conclusion

9.1 Having considered the relevant National Policy Guidance and Development Plan Policies the Council is satisfied that there is a compelling case in the public interest for compulsory powers to be sought in order to secure the redevelopment of the Order Land, subject to the grant of planning permission, for the economic, social and environmental improvement of the area. The Council is therefore pursuing the compulsory purchase order and requests that the Secretary of State confirms the Order.

10. Documents, Maps or Plans

A list of documents that may be presented at any subsequent public inquiry will be provided in due course and arrangements will be made for them to be available for public inspection.

The Council reserves the right to modify, or enlarge the statement in the event of an inquiry being held and in discharge of its obligations under the Inquiry Procedure Rules.