

IN THE MATTER OF  
THE LONDON BOROUGH OF BARNET (BRENT CROSS CRICKLEWOOD)  
COMPULSORY PURCHASE ORDER (NO. 1) 2015

AND IN THE MATTER OF REF NOS 364 AND 418 ON MAP 1

---

**OBJECTIONS**

---

These are the Objections of:

JD Sports Fashion Plc trading as Blacks Outdoor Retail at Unit N11, Brent  
Cross Shopping Centre.

Hereafter the Objector

To the above mentioned Order

The Objector:

Holds the property on a 1 year lease from 1<sup>st</sup> February 2014 and are  
currently "holding over".

The Objector makes the following Objections to the CPO:

1. There is no compelling case for the use of compulsory acquisition powers in the public interest as The London Borough of Barnet have failed to engage adequately with the Objector for the acquisition of its

interest. There is no compelling case for the use of compulsory acquisition powers in the public interest as The London Borough of Barnet have failed to have regard to the interest of the Objector and thus has failed to consider its interests contrary to the guidance in Circular 6/2004 at paras 17 and 18.

2. There is no compelling case for the use of compulsory acquisition powers in the public interest as the CPO fails to acknowledge the contribution which businesses of a nature carried out by the Objector provide or to make any provision for the relocation of that business.

3. The London Borough of Barnet has not attempted to progress negotiations for the acquisition of the Objector's interest. As The London Borough of Barnet have failed to negotiate or to negotiate in good faith, it has failed to show that the use of compulsory acquisition powers are justified.

4. Article 1 of the First Protocol of the European Convention on Human Rights is engaged and there will be interference with the Objector's Convention right which would not be necessary or proportionate given the failure of Centro to negotiate in good faith and/or provide for the relocation of the Objector's business.

5. There will be a violation of Article 1 of the First Protocol unless the requirements for justifiable interferences are met by provision of a property to relocate the business or compensation sufficient to overcome the disproportionate effect on the interest of the Objector in them being deprived of potentially valuable business.

SIGNED: *Tanner Rose*  
...

DATED: *27<sup>th</sup> May 2015*  
...

All communications to:

Adrian Rose  
Tanner Rose  
80 Cannon Street  
London EC4N 6HL

IN THE MATTER OF  
THE LONDON BOROUGH OF BARNET  
(BRENT CROSS CRICKLEWOOD)  
COMPULSORY PURCHASE ORDER  
(NO. 1) 2015

AND IN THE MATTER OF REF NOS 364  
AND 418 ON MAP 1

---

**OBJECTIONS**

---

TANNER ROSE LLP  
80 CANNON STREET  
LONDON  
EC4N 6HL

REF Adrian Rose