



GERALDEVE

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27 May 2015

Our ref: AMC / CSL / G6202

Your ref:

Dear Sir

The London Borough of Barnet (Brent Cross Cricklewood) Compulsory Purchase Order (No.1) 2015
RAL Limited, 164 to 168 (even) Cricklewood Broadway
Plots 264, 265 & 266

Our client RAL Limited (referred to in this letter as RAL) occupies and trades from the above-mentioned property ("the property") and is holding over under the terms of a lease which expired in December 2014, having served notice on the landlord requiring the grant of a new lease. We are instructed by RAL to advise on compulsory purchase matters in respect of its interest in the property.

We write to object on behalf of our client to the above-mentioned compulsory purchase order ("the Order") on the following grounds:

1. RAL does not wish to be deprived of its interest in, and occupation of, the property.
2. The Council has not demonstrated that the proposed alteration to the junction of Cricklewood Lane and Cricklewood Broadway is necessary or that the acquisition of RAL's interest is necessary for the alteration, or alternatively that satisfactory alteration to this junction could not be carried out without the need to acquire the property.
3. RAL is anxious to retain its representation in this location and currently operates a profitable business from the property. It has not to date been able to identify a suitable alternative property to which its operation could be located and is concerned that no suitable property will become available in the timescale within which it would be likely to have to give up possession were the Order to be confirmed. It is particularly concerned due to the number of retailers also likely to be seeking alternative premises in the locality.
4. If it can be demonstrated that removal of the property is necessary and unavoidable, the Council or the promoter of the scheme should utilise the part of the site not required by constructing a new unit suitable for RAL's business and offer a lease of that unit to RAL on reasonable market terms.
5. The Council has not demonstrated that there is a sufficiently compelling case in the public interest to justify interfering with RAL's rights under the European Convention on Human Rights.

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6. No, or insufficient, efforts have been made to purchase RAL's interest. It cannot be said that compulsory purchase powers are required on the grounds that it is not possible to acquire the interest by agreement.
7. There are no compelling grounds for the acquisition of RAL's interest in the property. Accordingly we request that the Order is not confirmed in relation to the interest.

We would be grateful if you would acknowledge receipt of this letter and keep us informed of progress.

Yours faithfully

Gerald Eve LLP

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