



GERALDEVE

Secretary of State
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27 May 2015

Our ref: AMC / CSL / G6439

Your ref:

Dear Sir

The London Borough of Barnet (Brent Cross Cricklewood) Compulsory Purchase Order (No.1) 2015
Arcadia Group Limited and Burton/Dorothy Perkins Properties Limited, Unit 7, Brent South Shopping Centre
Plot 103, Table 2

We are instructed by our client Arcadia Group Limited and Burton/Dorothy Perkins Properties Limited (referred to collectively in this letter as Arcadia) to advise on compulsory purchase matters in respect of the leasehold interest in the above retail unit ("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. Arcadia occupies and trades from the property as lessee.
2. The rights of access appurtenant to the property are shown on Table 2 of the Schedule to the Order as land in respect of which Arcadia, as occupier of the property, is likely to make a claim.
3. It is reasonably to be assumed that Arcadia has been included in Table 2 to the Schedule because it is anticipated that the access to the property may be permanently or temporarily obstructed or prevented.
4. Arcadia is reliant, for the operation of its business, on the continuation of uninterrupted customer and service access to the property. Any obstruction to or interference with the access could cause severe damage to the business.
5. No indication has been given of the nature or potential duration of interference with the access, nor has an indication been given of measures to be taken to prevent or alleviate such interference or an undertaking given for alternative provision to be made.
6. The Council has not demonstrated that there is a sufficiently compelling case in the public interest to justify interfering with Arcadia's rights under the European Convention on Human Rights.



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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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