

25 JUN 2015

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24 June 2015

Dear Sirs

The CPO: London Borough of Barnet (Brent Cross Cricklewood) Compulsory Purchase Order (No 1) 2015
The Property: 1 Claremont Road, London NW2 1BP
CPO Plots: 254 and 255
The Objector: Pampa Holdings Limited c/o Standard Bank Offshore Trust Company Jersey Limited

The Objector is the freehold owner of the Property, including Plots 254 and 255, and objects to the proposed compulsory acquisition of its land and rights over its land for the following reasons:

- 1) The London Borough of Barnet (the Council) has failed to adequately demonstrate that there is a compelling case in the public interest for the CPO and that the proposed acquisition of Plot 254 and the acquisition of rights over Plot 255 will facilitate the development of land contributing to the economic, social and environmental well-being of the London Borough of Barnet.
- 2) The Council has failed to properly consult with the Objector in relation to the CPO and the development scheme it is promoting.
- 3) In contravention of Para. 24 of ODPM Circular 06 2004: Compulsory Purchase and the Crichton Down Rules, the Council has failed to engage with the Objector in negotiations in order to agree terms for the use/acquisition of Plots 254 and 255 without resorting to the use of compulsory purchase powers.
- 4) The Council has failed to properly explain why it needs to acquire Plot 254 and why its development objectives could not be achieved without the Plot, or by acquiring other land.
- 5) Plot 255 extends across the entire frontage of the Property and access to the parking area serving the Property can only be gained over it. The Council has provided no details of how vehicular access to the Property might be gained during the period it intend to exercise the rights it is seeking to acquire over Plot 255.
- 6) Plots 254 and 255 both form part of the parking area serving the Property, without which its use and enjoyment will be severely affected. No indication has been given by the Council that the harm caused by the acquisition of Plot 254, or the securing of rights over Plot 255 will be adequately remedied by compensation, or that all of the loss that might potentially be incurred by the Objector will be compensated.

**WELL PLACED
PROPERTY ADVISORS**

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- 7) To the extent it might be required, no offer of either temporary or permanent alternative parking for the Property has been provided to the Objector.
- 8) The Council has not sufficiently justified interfering with the human rights of the Objector.

In light of the above and any other objection the Objector may raise in relation to the proposed acquisition of land and rights over the Property pursuant to the CPO, the Objector requests that the powers of compulsory acquisition the Council seeks over Plot 254 and 255 are refused.

Yours faithfully



For and on behalf of Glenn LLP