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The Secretary of State for Levelling Up, Housing and  
Communities  
Planning Casework Unit  
23 Stephenson Street  
Birmingham  
B2 4BH

By email to [pcu@levellingup.gov.uk](mailto:pcu@levellingup.gov.uk)

**Ref:** ARHE / CSL

2 March 2023

Dear Sirs

**The London Borough of Haringey (High Road West Phase A) Compulsory Purchase Order 2023 ("the Order")**

**Done Brothers (Cash Betting) Ltd, 777/779 High Road, Tottenham, London N17 8AH**

We are instructed by Done Brothers (Cash Betting) Limited ("Betfred"), trading as Betfred Limited, to advise on compulsory purchase and compensation matters in respect of oversailing rights over the Property proposed to be compulsory acquired by the London Borough of Haringey ("the Council").

Betfred is included in Table 2 of the Schedule to the Order against Plots 121, 122 and 123 in respect of new rights over the Property.

Betfred holds a 10 year lease of the Property which continues until 24 March 2024 and provides Betfred with security of tenure.

We write on behalf of Betfred to object to the above-mentioned Order on the following grounds:

1. Betfred does not wish to be deprived of its rights over the Property;
2. For the successful trading at the store, it is vital that Betfred is provided with information regarding the proposals for works affecting its interests. No information has been given by the Council about how the use of the rights will impact on Betfred's ability to continue to trade at the Property, including the safe access to the Property and operation of emergency access etc.;
3. No direct contact nor offer has been made by, or on behalf of, the Council, with Betfred prior to the making of the Order to acquire the rights sought over the Property;
4. Betfred is willing to negotiate appropriate terms with the Council in respect of a right of way, and with rights and other covenants contained within its lease which are interfered with, which would provide the Council with the rights it requires but also give proper protection to Betfred.

Compulsory acquisition of the rights is not necessary and would not provide Betfred with sufficient protection.

5. The Council has not demonstrated that there is a sufficiently compelling case in the public interest to justify interfering with Betfred's rights under the European Convention on Human Rights;
6. There are no compelling grounds for the Order to be confirmed to enable the compulsory acquisition of the rights over the Property.

Accordingly, we request that the powers under the Order are not confirmed in relation to the acquisition of rights over our client's Property.

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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