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17 August 2021

BY POST & BY EMAIL

Secretary of State for Housing, Communities and
Local Government
c/o Planning Casework Unit
5 Philip's Place
Colmore Row
Birmingham
B3 2PW

ashurst

Dear Sir

**Our Client: Herbert George Heaver and Shelagh Heaver
Chichester District Council (Tangmere) Compulsory Purchase Order 2020 (the "Order")
Objection on behalf of our client Herbert George Heaver and Shelagh Heaver of West Stoke
Farm, West Stoke, Chichester, PO18 9BQ**

We refer to our letter dated 9 December 2020 submitting an objection to the Order on behalf of our client.

We note from paragraph 11.51 of the Council's Statement of Case that heads of terms are under negotiation.

Unfortunately, despite a number of requests and attempts to progress negotiations of the heads of terms, there has been no substantive response from Countryside.

In the absence of finalising the heads of terms and exchanging a satisfactory agreement, our client's objection to the Order as set out in our letter of 9 December 2020 remains. In particular we have not seen nor received any evidence of a compelling need for our client's interest in Plots 2 and 3 of the Order Land to be acquired to facilitate the delivery of the Scheme.

In the event that it is not possible to agree a satisfactory agreement to secure the withdrawal of our client's objection, we formally request that should the Inspector, acting on behalf of the Secretary of State, be minded to confirm the Order, that this is done with a modification to remove Plots 2 and 3.

Yours faithfully,

Ashurst LLP

Ashurst LLP

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