

From: [John Webster](#)
To: [Alexander Booth QC](#); [Yohanna Weber](#)
Cc: [Dave Kerr](#)
Subject: FW: Chichester District Council (Tangmere) Compulsory Purchase Order 2020 (the "Order") [IM-Active.FID2807516] [RC-ACTIVE.FID798306]
Date: 02 September 2021 10:20:54
Attachments: [image001.jpg](#)
Importance: High

Seaward's withdrawal

John Webster

Partner

Direct: [+44 \(0\)20 8394 6553](tel:+442083946553)

Main: [+44 \(0\)20 8789 9111](tel:+442087899111)

john.webster@russell-cooke.co.uk

russell-cooke.co.uk



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From: Stuart Tym [mailto:Stuart.Tym@IrwinMitchell.com]
Sent: 02 September 2021 10:18
To: Chris Banks
Cc: Steve Culpitt; Tina Webster; Jonathan Stott; gsmith@kingschambers.com; Jonathan Stott; pcu@communities.gsi.gov.uk; Dave Kerr; John Webster
Subject: Chichester District Council (Tangmere) Compulsory Purchase Order 2020 (the "Order") [IM-Active.FID2807516]
Importance: High
This message originated from outside Russell-Cooke

Dear Sirs

Objection on behalf of Seaward Properties Limited

Further to my email below we now write to inform the Secretary of State that Seaward Properties Limited has agreed and exchanged a voluntary agreement with Countryside Properties (UK) Limited in respect of its interests in the Tangmere Strategic Development Location.

Seaward Properties Limited therefore withdraws its objection to the Order dated 9 December 2020 (as supplemented by the evidence of Mr Stott dated 27 August 2021. Please acknowledge receipt of this email.

Please disregard any need to incorporate Seaward or Mr Riley-Smith into the timetable for the inquiry next week.

Kind regards

Stuart Tym

Planning Lawyer (Senior Associate Solicitor)
Irwin Mitchell LLP

Phone: 0121 203 5550

Twitter: @planninglawbrum

Passle: <https://imbusiness.passle.net/u/102fcln/stuart-tym>

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From: Stuart Tym

Sent: 27 August 2021 19:03

To: 'Chris Banks'

Cc: Steve Culpitt; Tina Webster; 'Jonathan Stott'; gsmith@kingschambers.com

Subject: RE: [External] Tangmere CPO CMC 20th July 2021 [IM-Active.FID2807516]

Dear Chris

Further to your email of 18th August, please now find attached the short Proof of Jon Stott in support of Seaward's objections. Please accept my apologies for the delay in submitting this Proof. All parties remain working hard to get land agreement's completed which will negate the Seaward objection and their need to take an active part in the inquiry; however we are extremely close to the inquiry and those agreements are still not yet completed. It remains' my client's intention to withdraw from the inquiry if agreements can be completed which preserve my client's interests however if it is not possible to reach agreement Mr Stott will appear on behalf of Seaward. Mr Piers Riley-Smith of Counsel remains instructed.

If we are required to take an active part in the inquiry Counsel's indicative time estimates would be:

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- Opening – 10 minutes;
- Closing – 20 minutes;
- Jon Stott – evidence in chief – 30 minutes;
- Council's Planning Witness – 15 – 30 minutes;
- Council's Planning Policy Witness – 15 – 30 minutes;
- Countryside MD – 0 – 15 minutes;
- Countryside Surveyor 0 – 15 minutes.

Please confirm receipt.

Kind regards

Stuart Tym

Planning Lawyer (Senior Associate Solicitor)
Irwin Mitchell LLP

Phone: 0121 203 5550

Twitter: @planninglawbrum

Passle: <https://imbusiness.passle.net/u/102fcln/stuart-tym>

www.IrwinMitchell.com

From: Chris Banks [mailto:bankssolutionsuk@gmail.com]

Sent: 18 August 2021 17:44

To: Stuart Tym

Cc: Steve Culpitt; Tina Webster

Subject: Re: [External] Tangmere CPO CMC 20th July 2021 [IM-Active.FID2807516]

Hello Stuart,

All noted and I confirm that the Authority and the Inspector have been copied.

Kind Regards

chris

On 18 Aug 2021, at 16:45, Stuart Tym <Stuart.Tym@IrwinMitchell.com> wrote:

Hi Chris

I appreciate the Inspector was informed at the PIM that the Seaward legal agreement is at an advanced stage and it is anticipated that Seaward will withdraw their objections before the inquiry,

only once the agreement is finalised. This was expected to take place late last week but there have been some unexpected delays to the completion of those documents. Seaward will provide the Inspector with an update on their objection to the CPO from their witness Jonathan Stott of Gateley Hamer ASAP and apologise for any delay caused.

Seward still expect to be in a position to withdraw prior to the inquiry however if the agreements do not conclude their evidence will need to be presented by Mr Stott.

Kind regards

Stuart Tym

Planning Lawyer (Senior Associate Solicitor)

Irwin Mitchell LLP

Phone: 0121 203 5550

Twitter: @planninglawbrum

Passle: <https://imbusiness.passle.net/u/102fcln/stuart-tym>

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