

**Date** 3 May 2023  
**Our Reference** NWIG1/THE28338/2  
**Your Reference**  
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The Secretary of State for Levelling Up, Housing and Communities  
Planning Casework Unit  
23 Stephenson Street  
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**BY POST AND EMAIL**  
**([pcu@communities.gov.uk](mailto:pcu@communities.gov.uk))**

Dear Sirs

**Objection to the Chichester District Council (Tangmere) (No 2) Compulsory Purchase Order 2023**  
**Our Client: Woodhorn Group**

1. Introduction
  - 1.1 We are instructed by Andrew John Pitts and Woodhorn Group Limited as the partners of the Woodhorn Group ("Woodhorn Group") to make an objection to the confirmation of the Chichester District Council (Tangmere) (No 2) Compulsory Purchase Order 2023 ("CPO 2").
  - 1.2 The Order was made by Chichester District Council ("the Council") on 30 March 2023 pursuant to Section 226(1)(a) of the Town and Country Planning Act 1990 (as amended) ("1990 Act"). The stated purposes of CPO 2 is to enable the Council to compulsorily acquire the land interests required to deliver the development of the Tangmere Strategic Development Location ("TSDL") to be brought forward, subject to planning, by its development partner Countryside Properties (UK) Limited ("Countryside") to include to secure a small further area of land required for access to TSDL from the A27 which was excluded from the Chichester District Council (Tangmere) Compulsory Purchase Order 2020 ("CPO 1").
  - 1.3 The land ("Order Land") included in CPO 2 is identified within the schedule to CPO 2 ("Order Schedule") and on the map accompanying CPO 2 ("Order Map").
  - 1.4 Woodhorn Group are the freehold proprietors of Plots 5, 13 and 14 of the Order Land ("the Woodhorn Land") over which the Council are seeking compulsory purchase powers in CPO 2. Woodhorn Group are, therefore, a 'qualifying person' pursuant to section 12 of the Acquisition of Land Act 1981 ("1981 Act") and this letter should be treated as a 'relevant objection' as defined by section 13 of the 1981 Act.

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1.5 In the event that it is necessary for Woodhorn Group to maintain and actively pursue its objection to CPO 2 in respect of the Woodhorn Land, they would be requesting that a public local inquiry should be held by the Secretary of State for Levelling Up, Housing and Communities (“Secretary of State”) to consider the merits of CPO 2.

## 2. Current position

2.1 Woodhorn Group are currently in negotiations with:

- (a) Countryside with respect to making suitable amendments to the voluntary agreement entered into with Countryside in connection with the Chichester District Council (Tangmere) Compulsory Purchase Order 2020 (“CPO 1”) to take account of CPO 2; and
- (b) With the Council in relation to entering into a fresh deed of undertaking in relation to CPO 2 reflecting the deed of undertaking entered into with the Council in connection with CPO 1 (collectively “the Variation Agreements”).

2.2 It is the shared intention of Woodhorn Group, Countryside, and the Council to collectively act with all reasonable expedition to promptly conclude negotiations on the Variation Agreements and proceed to an early completion.

2.3 However, the Secretary of State will appreciate that unless and until the Variation Agreements have been completed that Woodhorn Group wishes to maintain its objection to CPO 2 to protect its position.

## 3. Reservation of Rights Grounds of Objection

3.1 Accordingly, Woodhorn Group hereby fully reserves its position and its right to supplement this objection to CPO 2 if negotiations with Countryside and the Council on the Variation Agreements break down.

## 4. Conclusion and Next Steps

4.1 In the unlikely event that negotiations with Countryside and the Council on the Variation Agreements break down, we can confirm that Woodhorn Group would be minded to actively object to CPO 2 and would be requesting in that event a public local inquiry be held into the merits of CPO 2 and would wish to appear at and actively participate in any such inquiry.

4.2 It is, however, sincerely hoped that this course of action will not be necessary and that the Variation Agreements will be completed shortly.

4.3 We will keep the Secretary of State updated as to the position on this objection moving forwards and in the event of completion of the Variation Agreements will promptly thereafter proceed to withdraw its objection to CPO 2.

- 4.4 This objection is submitted on behalf of Woodhorn Group and any enquiries relating to this objection should be addressed to Nigel Wigin at Knights ([nigel.wigin@knightsplc.com](mailto:nigel.wigin@knightsplc.com)).
- 4.5 A copy of this letter of objection has been emailed to the Council.
- 4.6 We would appreciate it if you could please acknowledge safe receipt of this letter.
- 4.7 We look forward to hearing from you further.

Yours faithfully

Knights

**Knights**