

The Secretary of State for Levelling Up, Housing
and Communities
Planning Casework Unit
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Our Ref: ml3/ctcs/233222/1
Your Ref:
Date: 04 May 2023
When calling please ask for: Christian Silk
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Dear Sirs

**Objection to the Chichester District Council (Tangmere)(No 2) Compulsory Purchase Order 2023
Our clients: Deirdre Jane Pitts, Michael William Pitts, Diana Mary Pitts and Valerie Ann Young**

1. Introduction

- 1.1 We are instructed by our above named clients ("Clients") to make an objection to the confirmation of the Chichester District Council (Tangmere) (No 2) Compulsory Purchase Order 2023 ("**CPO 2**").
- 1.2 CPO 2 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). The stated purpose 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**"), subject to planning, by its development partner Countryside Properties (UK) Limited ("**Countryside**"). This includes securing 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 and on the map accompanying CPO 2.
- 1.4 Our Clients are the registered freehold proprietors of Plots 7, 8, 9A and 9B of the Order Land ("**the Plots**") over which the Council are seeking compulsory purchase powers in CPO 2. Our Clients 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.
- 1.5 In the event that it is necessary for our Clients to maintain and actively pursue their objection to CPO 2 in respect of the Plots, 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 and justification for CPO 2.

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2. **Current position**

2.1 Our Clients 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 Our Clients intend to act with all reasonable expedition to promptly conclude negotiations of the terms of the Variation Agreements and proceed to an early completion. However, until the Variation Agreements have been completed our Clients wish to maintain their objection to CPO 2.

3. **Reservation of Rights Grounds of Objection**

3.1 Accordingly, our Clients hereby fully reserve their position and their right to supplement this objection to CPO 2 if the terms of the Variation Agreements cannot be agreed between the parties to them.

4. **Conclusion and Next Steps**

4.1 In the unlikely event that the terms of the Variation Agreements cannot be agreed between the parties to them, our Clients would be minded to pursue their objection to CPO 2 in detail and would be requesting in that event a public local inquiry be held into the merits of and justification for CPO 2. Our Clients wish to appear at and actively participate in any such inquiry including through their appointed agents and legal representatives.

4.2 We will keep the Secretary of State updated as to the progress of negotiations and if completed the completion of the Variation Agreements. If the Variation Agreements complete our Clients intend to withdraw their objection to CPO 2.

4.3 Any enquiries relating to this objection should be addressed to Christian Silk of Foot Anstey LLP (Christian.silk@footanstey.com).

4.4 A copy of this letter of objection has been emailed to the Council.

4.5 We would be grateful if you could acknowledge safe receipt of this letter.

We look forward to hearing from you further.

Yours faithfully

Foot Anstey

Foot Anstey LLP