

4 Saxon Meadow,  
Tangmere  
West Sussex  
PO20 2GA

Secretary of State for Levelling Up, Housing and Communities  
Planning Casework Unit  
23 Stephenson Street  
Birmingham  
B2 4BH  
Submitted by email to: PCU@communities.gov.uk

26 April 2023

Dear Sir/Madam,

### **OBJECTION LETTER**

*Chichester District Council (Tangmere) (No 2) Compulsory Purchase Order 2023<sup>1</sup>*  
(CPO)

I object to this CPO. I support the objections made by Saxon Meadow Tangmere Ltd (SMT Ltd), which is the management company for 28 residential leasehold properties at Saxon Meadow, Tangmere, including my residential property 4 Saxon Meadow which I acquired on 5 January 2021.

I am also submitting my own objection as a residential leaseholder to protect my individual property rights and human rights. Left unopposed, I consider that the CPO would have a material negative impact on these rights, that it is not compatible with the provisions of my lease, that it could unfairly restrict or compromise access to and from my property and destroy amenities that I use and enjoy at Saxon Meadow and require for the foreseeable future. This is contrary to the principle of equivalence. My neighbours will suffer the equivalent harm.

My objections relate to Plots 6, 7, 8, 9, 9a and 9b. I have read the Statement of Reasons and I consider that it is flawed, misleading, inaccurate and incomplete in relation to Saxon Meadow. Rather than repeat the objections of SMT Ltd here, I have set out my own objections and have used published government guidance<sup>2 3</sup> about CPO as reference sources. I consider that Chichester District Council (the acquiring authority) has failed to set out valid reasons for this CPO. I do not consider that there is a compelling case in the public interest to use a CPO to acquire this land and there is not a valid purpose which would justify interfering with my human rights. I also do not think that the acquiring authority has a clear idea for how it would use the land and that it cannot show necessary resources.

Overall, my objections only require minor amendments and changes to the location of aspects of the "scheme" (which has an overall size of 77 hectares – or 770,000 square metres) and would affect boundaries by a very small fraction of the overall scheme and

---

<sup>1</sup> <https://www.chichester.gov.uk/tangmerestrategicdevelopment>

<sup>2</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1071500/CPO\\_guidance\\_-\\_with\\_2019\\_update.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1071500/CPO_guidance_-_with_2019_update.pdf)

<sup>3</sup> <https://www.gov.uk/guidance/compulsory-purchase-and-compensation-guide-1-procedure#objecting-to-a-cpo>



have no impact on the overall objectives of the scheme or the plan to build houses or other features. I now require that all these matters be addressed through a combination of amendments to property registers, boundary changes, exclusions, binding commitments and other robust means to address objections.

I welcome the prospect for the Secretary of State or the Planning Inspectorate to send an inspector to undertake a site visit at Saxon Meadow Tangmere before or during a public inquiry because I think that there is a need for a fair, impartial, open and customer-focused organisation to look at the matter.

#### *Access to and from Saxon Meadow*

I am very concerned that unless the CPO is changed, Saxon Meadow will be "turned into an island" and would lose existing, essential rights without any public benefit or purpose. I consider that para 2.12 and 2.15 of the Statement of Reasons is materially incorrect as it makes no reference to physical reality of the place, nor to the material interests that SMT Ltd and that residential leaseholders such as myself have in this land, including the rights of way and existing use of this land that is required to access our properties and for the passage of all the existing and required infrastructure above and below ground.

When I inspected the Land Registry portal about this location I could see that there several distinct parcels of land on its maps, but ownership records appear to be incomplete and hard to reconcile with the CPO maps. Plot 8 is part of Saxon Meadow's access driveway and Plot 7 is in fact a bundle of distinct parcels of land bounded by natural borders including hedgerows, walls and changes of levels, whereas my objection concerns a very small part of this land. It is immediately apparent to anyone who visits our estate that the access driveway to Saxon Meadow from Church Lane (corresponding to Plot 8 and part of Plot 7) is an integral part of the Saxon Meadow estate next to homes and is required at all times for access above ground, parking and the passage of essential utilities over or below ground and this has been the case for several decades, particularly since Saxon Meadow was developed for residential occupation in 1985. I also understand that SMT Ltd has maintained this land successfully for many years and shown itself to be a responsible custodian of it.

Furthermore Paragraph 2.3 of the Statement of Reasons does not acknowledge the fact that this part of Plot 7 is within the boundary of the Tangmere Conservation Area<sup>4</sup> which is subject to special planning regulations,<sup>5</sup> and I note that there is government guidance about the statutory protection of trees inside conservation areas.<sup>6</sup> When I looked at the CDC planning portal in relation to the "outline plan" for Tangmere, I was struck by the material omission of the pond at this site and have no idea why this would be left out even though it is marked clearly in official records such as the Land Registry, and represents a key attribute of the Tangmere Conservation Area. I think this pond is a haven for biodiversity and could be the home of protected species given that I have seen newts in the water, and it is a critical natural resource to provide water for several mature trees including a large weeping willow, as well as the Yew Tree in St Andrews Church yard, which is subject to a Tree Preservation Order. Taking these various points together, it seems to me that the acquiring authority does not have a clear understanding of these matters nor plans for how it would use this land or the

---

<sup>4</sup> [https://www.chichester.gov.uk/media/3159/Tangmere-CACA/pdf/Tangmere\\_CA\\_Review\\_-\\_Final.pdf](https://www.chichester.gov.uk/media/3159/Tangmere-CACA/pdf/Tangmere_CA_Review_-_Final.pdf)

<sup>5</sup> [https://www.chichester.gov.uk/media/30720/Residents-Guide-to-the-Tangmere-Article-4-Directions/pdf/Residents\\_Guide\\_to\\_the\\_Tangmere\\_Article\\_4\\_Directions.pdf](https://www.chichester.gov.uk/media/30720/Residents-Guide-to-the-Tangmere-Article-4-Directions/pdf/Residents_Guide_to_the_Tangmere_Article_4_Directions.pdf)

<sup>6</sup> <https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas#Protecting-trees-in-conservation-areas>



necessary resources. I have looked at the acquiring authority's plans for a segregated cycle path across Plot 7 and note that that would only require a very small amount of space which could be accommodated on the site without affecting its existing use, but would require input from the SMT Ltd and residents to accommodate it on a permissive basis. This indicates the absence of compelling reasons for a CPO.

In summary, Plot 8 needs to be removed from the CPO and a site survey is needed in the presence of SMT Ltd's surveyor and residents to inform the changes needed to Plot 7 to address my objections.

#### *Open space to the west of Saxon Meadow*

I think Plots 9, 9a and 9b are not necessary for the scheme and I think that they should remain under the ownership of SMT Ltd. I do not understand how an arbitrary line came to be drawn through this open space and for it to be labelled Plot 9 in the CPO. I do not recognise the statement at para 11.8 of the Statement of Reasons. I have never been consulted about this matter as a resident of Saxon Meadow or as a shareholder of SMT Ltd about this matter at any time, and if I had been consulted, then I would have strongly opposed any agreement in this regard.

Plot 9 resents approximately half of the open space to the west of Saxon Meadow. When I purchased my property at Saxon Meadow in 2021, I was particularly attracted by the availability of this open space as an amenity for residents, guests, visitors and the local community. As I do not have my own private garden and I have come to use and enjoy the communal space very much indeed. This open space is used by a variety of people – not just those living at Saxon Meadow – and it can be accessed from the east and west by pedestrians. From time to time it has also been used for grazing sheep. Anyone familiar with the location would recognise that this land is not used exclusively by residents of Saxon Meadow and that it already provides public benefit in its current, undivided layout.

I believe that Plot 9 should be safeguarded as strategic capacity facilitate a renewable energy project below the ground to support the transition from gas boilers to renewable energy for the 28 properties at Saxon Meadow. I believe that this would require all of the available land to the west of Saxon Meadow including Plot 9. When I purchased my property in 2021, I looked into the possibility of renewable energy solutions, but there is a lack of space available to install a heat pump outside my property and the schemes available to residents at that time were inaccessible to me so I have been thinking about other options for some time. I have carried out some energy efficiency steps to improve insulation and energy efficiency but I am still reliant on natural gas for hot water and heating, which has become much more expensive due to the increase in gas prices since Russia's illegal invasion of Ukraine in 2022, and this is not a sustainable arrangement for the long-term in light of the government's net zero strategy.

Since its introduction in 2022, there is a relevant government-funded grant scheme available for which our properties appear to be eligible. In my opinion, a project of this kind would provide significant public interest benefits – it would support the environment by addressing climate change issues; it would support the economy by providing employment and economic value; and it would support social issues by safeguarding the wider community from the effects of using gas for heating and hot water and could showcase the possibilities for renewable installations in heritage properties. Once the scheme has been delivered, the meadow itself could be enhanced further, e.g. through reseeded it as a wildflower meadow – which is a popular idea amongst my neighbours and consistent with the local plan. In my view only SMT Ltd



and its residents can deliver this outcome given its proximity to the homes to which the project would provide clean energy.

I am not convinced that there is a requirement for another community orchard in Tangmere and I do not think it is a valid purpose for a CPO on this land. There is already a community orchard in Tangmere just 450 paces to the east of Saxon Meadow, adjacent to the community garden, but it appears underutilised and unfortunately it has suffered damage and neglect so it does not give the impression of being inclusive space, and I do not want detriment of this kind to affect Saxon Meadow. I have contacted the acquiring authority to report my concerns but they have denied responsibility for addressing the matter. I do not believe that it is appropriate to use of Plot 9 for a community orchard, given that this would compromise the prospects for a renewable energy installation below ground. I think that any requirement that could be demonstrated to install another community orchard could be delivered by placing it elsewhere on the CPO land at a more suitable location, such as to incorporate it alongside the proposed allotments intended on the field to the east of Saxon Meadow (which is part of Plot 7). I note that 'The Chichester Local Plan: key policies, 2014-2019'<sup>7</sup> makes no reference to a community orchard, whereas the Tangmere Neighbourhood Plan stated: "*The Concept Plan identifies land for this purpose located in the field south east of the Church, which provides for public access from the east and west and contributes to the setting of the Church*"<sup>8</sup>, which is the appropriate location in my view, and based on my inspection of the maps related to the outline planning application (available to the public access to the planning portal), there seems to be enough room to place it there.

Plot 9 should be removed from the CPO along with Plots 9a and 9b once the boundary is confirmed.

#### *Inadequate communication*

I am concerned about the acquiring authority's inadequate approach to communication in relation to the CPO and the scheme to which it relates.

Since receiving correspondence about the CPO in January 2023 I have sought more time and to discuss these matters with the acquiring authority. There has been no satisfactory response to my representations, or to others made by my neighbours. I consider that the stance taken by the acquiring authority is not compatible with its own principles of community involvement<sup>9</sup> and its development partner has ignored the communications and engagement plan.<sup>10</sup> For example, the acquiring authority has told me that during Covid-19 it changed its policy about planning notices, such that 'publicity does not include neighbour notification letters', but that 'from March 2023 has re-introduced the use of neighbour notification letters as part of the publicity of planning applications'. I consider this to be inconsistent with the issuance of CPO letters to residents on 25 January 2023. In any event it seems to be a very tardy exit from the Covid-19 restrictions. Fundamentally, this denied me the opportunity to make representations about important matters common to both the planning process and CPO which I would have submitted by 6 January 2023 had I received adequate notice about this consultation. The acquiring authority failed to meet its self-imposed deadline

---

<sup>7</sup> [printed version.pdf \(chichester.gov.uk\)](#)

<sup>8</sup> [https://tangmere-pc.gov.uk/wp-content/uploads/2020/09/tangmere\\_neighbourhood\\_plan\\_may\\_2016-1.pdf](https://tangmere-pc.gov.uk/wp-content/uploads/2020/09/tangmere_neighbourhood_plan_may_2016-1.pdf)

<sup>9</sup> <https://www.chichester.gov.uk/statementofcommunityinvolvement>

<sup>10</sup> <https://www.chichester.gov.uk/CHttpHandler.ashx?id=33110>



to respond to my complaint about this matter which it stated was 'due to competing priorities'.

I consider that the acquiring authority has already caused me significant inconvenience, and prevented me from relaxing during my planned holiday at Easter because it chose to race ahead to pass council resolutions and to issue the draft CPO order on 30 March 2023, which I think was driven by its intention to take unfair advantage of the Easter and May public holidays for its own consultation, which meant that I had to spend time speaking with neighbours and supporting our search for professional advisors to engage in negotiations. During this period, after the draft CPO order was issued, I have seen an email from the acquiring authority's surveyor to SMT Ltd's surveyor which stated that relevant officers were 'on annual leave for the last week or so' and they were therefore unavailable for any negotiations. I think that we should be treated more fairly than this, and there is a need for a thorough review and perhaps even a change of personnel.

This lack of opportunity to comment has left me with no option but to add to my objection the inclusion of Plot 6 of the CPO land which is on the southern boundary of Saxon Meadow and is seen from my kitchen, living room and bedroom from which I have observed periodic ponding / flooding after rainfall. It is clear to me that the acquiring authority needs to ensure that remedial work to address surface water issues on this boundary will be funded by the developer before any further plans for housing is considered, a requirement in accordance with the existing local plan. I regard these concerns as grounds for objection to the CPO of Plot 6, especially because the statement of reasons at paragraph 7.11 confirms the current absence of agreements about developer contributions towards the scheme (ie lack of necessary resources, as noted in government guidance). The acquiring authority should put forward some proposals to resolve this matter.

For the time being, based on what I have seen since becoming involved in this saga in January 2023, I remain to be convinced the acquiring authority is willing to negotiate with SMT Ltd, other objectors or myself. I do not believe that a written process is appropriate given the demonstrable failure (described above) of the acquiring authority to engage with representations.

I find it very troubling that the CPO seems to be ostensibly "anti Saxon Meadow", which is fundamentally incompatible with a "one Village" vision in the neighbourhood plan<sup>11</sup> and I would very much welcome and encourage efforts by the acquiring authority to redress this concern.

I do hope that the acquiring authority will take the necessary steps to engage openly, transparently and in good faith with the SMT Ltd and everyone at Saxon Meadow Tangmere to address the necessary changes to the CPO, including the removal of plots to address these objections, but if this is not the case then I welcome the opportunity to contribute to a public inquiry in due course.

I reserve the right to amend this objection in future.

Kind regards



Matthew Rees

---

<sup>11</sup> Section 4 [https://tangmere-pc.gov.uk/wp-content/uploads/2020/09/tangmere\\_neighbourhood\\_plan\\_may\\_2016-1.pdf](https://tangmere-pc.gov.uk/wp-content/uploads/2020/09/tangmere_neighbourhood_plan_may_2016-1.pdf)