

Our ref: TLG\1000-037-808  
Your ref: APP/PCU/CPOP/L3815/3264148  
Direct line: +44 20 7859 1114  
Direct fax: +44 (0)20 7192 5536  
Email: Trevor.Goode@ashurst.com

Ashurst LLP  
London Fruit & Wool Exchange  
1 Duval Square  
London E1 6PW

Tel +44 (0)20 7638 1111  
Fax +44 (0)20 7638 1112  
DX 639 London/City  
www.ashurst.com

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: Temple Bar Partnership LLP  
Chichester District Council (Tangmere) Compulsory Purchase Order 2020 (the "Order")  
Objection on behalf of our client Temple Bar Partnership LLP (Company Registration  
Number OC322567) of The Estate Office, Downs Road, Chichester, West Sussex, PO18 9BQ**

We refer to our letter of objection dated 9 December 2020.

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 15, 16 and 17 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 our client's interests in Plots 15, 16 and 17 referenced in Table 2 of the Schedule to the Order.

Yours faithfully,

*Ashurst LLP*

**Ashurst LLP**

EUS\393602447.01

Ashurst LLP is a limited liability partnership registered in England and Wales under number OC330252 and is part of the Ashurst Group. It is a law firm authorised and regulated by the Solicitors Regulation Authority of England and Wales under number 468653. A list of members of Ashurst LLP and their professional qualifications is open to inspection at its registered office London Fruit & Wool Exchange, 1 Duval Square, London E1 6PW. The term "partner" in relation to Ashurst LLP is used to refer to a member of Ashurst LLP or to an employee or consultant with equivalent standing and qualifications.