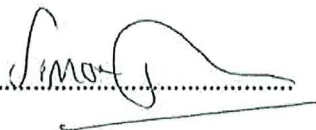


point out that we first put forward a counter offer in an email dated 29 April 2022 and at 12.1.7 it is correctly reported that a further counter offer was made by ourselves in an email dated 3 April 2023 and we wish to say that although there was a communication from Avison Young, no further negotiations have occurred since submitting that counter offer and we are still awaiting to hear from Avison Young.

4. My clients have re-confirmed that if we can reach an agreement based on the counter offer submitted, then they are willing to remove the objection to the Compulsory Purchase Order.

Signed: 

Dated: 27<sup>th</sup> June 2023

Simon Lush FRICS FAAV  
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Secretary of State for Levelling Up  
Housing and Communities  
Planning Casework Unit  
23 Stephenson Street  
Birmingham  
B2 4BH

Our Ref: SJL/P111

27 June 2023

Dear Sir

**Chichester District Council (Access Track Off Crooked Lane, Birdham) Compulsory Purchase Order 2023**

I am instructed to write on behalf of my clients, Mrs Patricia Frances Humphries of Eugenia, Eastergate Lane, Walberton, Arundel, BN18 0BA, Mr Robert William Stokes of Oxden, Burton, Mere, BA12 6BR, Heather Priest of 121 Sussex Road, Petersfield, GU31 4LB and Alice Candy of 40 Chelsea Road, Southsea, PO5 1NJ, being owners of adjoining land that have an interest in the said Track, in relation to the Compulsory Purchase Order made by the Chichester District Council dated 2<sup>nd</sup> May 2023 relating to the access Track off Crooked Lane, Birdham.

My clients have asked me to object and make a comment to the Order as follows:

1. Although it is accepted that planning consent has been granted on 14<sup>th</sup> October 2016 under reference no. BI/16/01809/FUL we have serious concerns as to whether the proposed access off Crooked Lane is suitable due to its present width, to provide an access up to highways standard which is suitable for the proposed development.
2. My clients own land to the north of the said track and as will be noted on the ground, there is an access gate serving that land from the said track. My clients have enjoyed uninterrupted access over the track to their land for many years. It is accepted, the said track is unregistered and my clients have not been able to provide evidence of title but that is no guarantee that they do not have a claim to the freehold title over all or part of the access track.
3. As indicated in the Statement of Reasons prepared by the Chichester District Council, it is confirmed that we have had communication with Avison Young and we wish to

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