

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 client, [REDACTED] of [REDACTED] Chichester, PO19 7DA being the owner of adjoining land that has 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 client owns agricultural land to the west of the said Track and have enjoyed uninterrupted access over the Track to gain access primarily with agricultural machinery. We suggest agricultural machinery has getting larger over the years and we are concerned that the use of this Track for both domestic traffic and Agricultural machinery is not conducive. It is accepted, the said track is unregistered and my client has 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. However it is documented that they do have a legal right of way for all purposes over the 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 point out that 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

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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 client 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 .....

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