

## Andrew Clarke

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**From:** Andrew Clarke  
**Sent:** 08 August 2024 17:31  
**To:** Peter Brownjohn; Clements, Corrina  
**Cc:** Brian Woods; jim.legate@pjbrown.co.uk; ws-project@emailworkflowmax.com; Harvey Emms; DALE Terence; Planning SE; toan.chau@coraiht.com; Marius Pieters  
**Subject:** RE: APP/D3830/C/23/3319435 - National Highways -Land East of Dan Tree Farm - SoCG National Highways -

Dear Mr Brownjohn and Ms Clements,

Further to the email and letters of National Highways of 29<sup>th</sup> July and 2<sup>nd</sup> August, including the draft Statement of Common Ground on highway matters to which the Council has been invited to be a party too, the Council is now seeking to engage with the enquiry on highway matters and will be commenting on the SoCG and will now be seeking to present evidence at the appeal in respect of reason 4.5 of the issue of the Enforcement Notice. This position supersedes that outlined in the Council's response to pre-inquiry note 2.

We will seek to provide initial comments on SoCG asap and would be grateful if any further information or evidence provided by the appellants (either in relation to the appeal or submissions to National Highways) be also provided to the Council.

Kind regards

Andy Clarke BSc (Econ), PGDip  
Senior Planning Officer  
Planning Investigation and Enforcement  
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Haywards Heath, West Sussex, RH16 1SS  
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or call 0800 328 0280

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**From:** Peter Brownjohn <peter.brownjohn@wspa.co.uk>  
**Sent:** Tuesday, August 6, 2024 11:38 AM  
**To:** Marius Pieters <Marius.Pieters@nationalhighways.co.uk>  
**Cc:** Brian Woods <brian.woods@wspa.co.uk>; jim.legate@pjbrown.co.uk; ws-project@emailworkflowmax.com; Andrew Clarke <Andrew.Clarke@midsussex.gov.uk>; Harvey Emms <harvey.emms@lichfields.uk>; DALE Terence

<tdale@systra.com>; Planning SE <planningse@nationalhighways.co.uk>; toan.chau@coraiht.com  
**Subject:** RE: National Highways -Land at Dan Tree Farm - SoCG National Highways - J004451

Dear Mr. Pieters,

**RE: National Highways -Land at Dan Tree Farm - SoCG National Highways - J004451**

Apologies for the delayed response. I ran through with my client and their consultant on Friday regarding this, and we are content with the suggested way forward outlined in the letter. We will be reviewing the SOCG and providing our input.

As requested, our clients highways team will be providing the requested documents, and these will be provided for review, I believe hopefully this week, but I will confirm.

In terms of timings for the SOCG, the deadline for Proofs of Evidence is 27 August, however, given the submission of the LPA that they will not be calling highways witness and evidence, we are content that, should there be a modest delay in discussions, submission of the SOCG late will not prove disruptive to either party, provided the document is agreed prior to the Inquiry.

Kind Regards

*Peter Brownjohn AssocRTPI*

Senior Planner

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**From:** Marius Pieters <[Marius.Pieters@nationalhighways.co.uk](mailto:Marius.Pieters@nationalhighways.co.uk)>

**Sent:** Friday, August 2, 2024 1:52 PM

**To:** Peter Brownjohn <[peter.brownjohn@wspa.co.uk](mailto:peter.brownjohn@wspa.co.uk)>

**Cc:** Brian Woods <[brian.woods@wspa.co.uk](mailto:brian.woods@wspa.co.uk)>; jim.legate@pjbrown.co.uk; [ws-project@emailworkflowmax.com](mailto:ws-project@emailworkflowmax.com); Andrew Clarke <[Andrew.Clarke@midsussex.gov.uk](mailto:Andrew.Clarke@midsussex.gov.uk)>; Harvey Emms <[harvey.emms@lichfields.uk](mailto:harvey.emms@lichfields.uk)>; DALE Terence <[tdale@systra.com](mailto:tdale@systra.com)>; Planning SE <[planningse@nationalhighways.co.uk](mailto:planningse@nationalhighways.co.uk)>

**Subject:** National Highways -Land at Dan Tree Farm - SoCG National Highways

Dear Mr Brownjohn

I write to you in regard to your appeal under grounds (a), (b), (d), (f) and (g) of section 174(2) of the Town and Country Planning Act 1990 which has been submitted against the Enforcement Notice served by the District Planning Authority.

National Highways would like to invite you to participate in drafting a Statement of Common Ground (SoCG). The purpose of the SoCG is to facilitate an efficient and effective inquiry process by identifying and agreeing upon factual matters and narrowing any issues still in dispute. By outlining areas of agreement and clarifying differences, we aim to streamline the proceedings, saving time and resources for all parties involved.

Please find attached:

1. A draft version of the SOCG.
2. Invitation to Enter into a Statement of Common Ground.

Thank you for your attention to this matter and we look forward to discussing the draft SoCG with you. Please can you provide me with possible dates for us to arrange a meeting to discuss the draft SoCG.

Best Regards

**Marius Pieters**, (he/him) Spatial Planning Manager  
South East Region, Operations Directorate  
National Highways | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ  
**Mobile:** 07543 508231  
**Web:** [www.nationalhighways.co.uk](http://www.nationalhighways.co.uk)

For information about our engagement with the planning system please visit  
<https://highwaysengland.co.uk/our-work/planning-and-the-strategic-road-network-in-england/>

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