

Submission ID: 14776

Deadline 2 submission on behalf of Mr Clive Hay-Smith, Mr Paul Middleton and Priory Holdings Limited (refs: 20033312, 20032995 and 20033311) (â€œOur Clientsâ€•)
Planning Inspectorate Reference: EN010109

1. The ExA's Rule 8 letter of 27 January 2023 requests comments on responses to Relevant Representations by Deadline 2 on 7 March 2023.
2. Our Clients have considered the Applicant's responses to Our Clients Relevant Representations.
3. Our Clients also note that the Applicant's comments on Our Clients' Written Representations are due at Deadline 2.
4. Representatives of both Our Clients and the Applicant have agreed to meet in person on 16 March 2023 to discuss proposed heads of terms for a potential private agreement between Our Clients and the Applicant in relation to the Projects.
5. Given the meeting on 16 March, Our Clients' consider it would not be proportionate or appropriate at this juncture to provide detailed comments on the Applicants responses to Our Clients Relevant Representations, particularly given Our Clients are waiting for responses on Our Clients' Written Representations which were submitted at Deadline 1.
6. Our Clients reserve their position to make detailed comments on the Applicant's responses to Our Clients Relevant Representations in due course following the meeting between Our Clients and the Applicant on 16 March 2023 (and indeed on any comments the Applicant makes on Our Clients' Written Representations). Our Clients anticipate being in a position to provide such comments in writing by Deadline 3 on 2 May 2023 or, if appropriate, orally at the Compulsory Acquisition Hearing on 29 March 2023.