

Date: 15 July 2024

Your Ref: TR020005 / GATW-AFP059

Our Ref: 15849 / Airport Industrial Property Unit Trust ('AIPUT'), on behalf of both Airport Industrial GP Limited ('AIGPL') and AIGPL's wholly owned subsidiary Airport Industrial Nominees Limited ('AINL').

DWD

69 Carter Lane
London
EC4V 5EQ

Responses to ExQ2

AIPUT set out their responses to the Examining Authority's (ExA) second round of written questions in Table 1 below.

ExQ2	Question	AIPUTs Response
CA.2.4 (Applicant)	<p>Permanent acquisition of land</p> <p>In Table 1-1 of NH's 'Comments on any Submissions Received by Deadline 5' [REP6-114], in respect to the need for the permanent acquisition of land which already forms part of the existing Strategic Road Network (SRN), NH have maintained their position that the blanket and broad approach to compulsory acquisition is unjustified and non-compliant with the Government's guidance on compulsory acquisition.</p> <p>Please provide additional plot specific justification as to why temporary powers would not suffice for the land in question.</p>	<p>AIPUT notes that it raised a similar issue in respect of the compulsory acquisition proposals relating to its land interests at Viking House. This was outlined in AIPUT's Written Representation (REP1-165) and subsequent submissions as part of the Examination. As set out in its previous submissions, AIPUT has for some considerable time sought plot specific justification from GAL as to why part of Viking House is identified for permanent acquisition, and an explanation for why temporary acquisition or a lesser right, for example private easement, would not suffice. AIPUT does not consider that adequate plot specific justification has been provided for the compulsory acquisition proposals affecting its land interests. Nevertheless, AIPUT is continuing discussions with GAL in the hope that an acceptable agreement can be concluded.</p>
CA.2.6 (Applicant)	<p>Engagement and communication</p> <p>Airport Industrial Property Unity Trust (AIPUT) [REP6-117] and Marathon Asset Management MCAP Global Finance (UK) LLP (MAMGF) [REP6-128] have raised concerns regarding lack of engagement and/ or slow communication by the Applicant, particularly in relation to responding to correspondence and returning or sending documentation.</p> <p>AIPUT [REP6-117] also noted that the status update provided in the Land Rights Tracker v3 [REP5-033] did not accurately reflect their position.</p> <p>The ExA acknowledges the scale of the Proposed Development but is keen to ensure effective engagement for all parties. Please advise if there</p>	<p>AIPUT is not aware of any specific barriers to engagement and have been available for meetings and sent reminder correspondence, along with suggesting alternative ways of addressing our concerns which have not been pursued. Following a meeting on 19 April 2024 at which an initial draft of heads of terms were discussed, AIPUT received from GAL a revised draft of the heads of terms on 3 July and provided a response on 11 July. AIPUT notes that GAL's advisors have been more proactive in recent weeks in progressing discussions.</p>

	are any specific barriers facing the Applicant in respect of continuing to undertake meaningful engagement and communication with Affected Persons?	
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