

*Taytime Limited
Monk Lakes
Staplehurst Road
Marden
Kent TN12 9BS*

Helen Skinner
Inquiries & Major Casework Team Leader
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol BS1 6PN

13th January 2025

Dear Ms Skinner,

Re: Appeal APP/U2235/W/20/3259300 - Monk Lakes, Staplehurst Road, Marden

I write regarding the ongoing matter of agency arrangements between Monk Lakes Limited (in liquidation) ("MLL") and Taytime Limited ("Taytime").

As you are aware, Mr Padden's legal team are currently reviewing the Agency Agreement dated 9th January 2025. Given the pattern of detailed procedural challenges throughout these proceedings, we are concerned that there may be attempts to find technical grounds to challenge these arrangements, despite the fact that they further and comprehensively address all matters raised in both the Inspector's decision and the High Court ruling.

Justice Lang made clear that MLL could continue to pursue the appeal through agents if appropriate terms were agreed. Throughout the redetermination period, the liquidators have repeatedly confirmed their position regarding the pursuit of this appeal and their relationship with Taytime. The Agency Agreement dated 9th January 2025 records in deed form these established arrangements, with the liquidators maintaining active control throughout this period.

Should Mr Padden's team pursue challenges based on technical or formalistic grounds, when the substance and intent of the arrangements so clearly address the previous judicial concerns, we would consider this to be vexatious conduct that undermines the proper administration of the planning system.

We respectfully suggest that any attempt to frustrate the determination of this appeal through continued technical challenges to properly constituted agency arrangements would constitute an abuse of process.

We trust that PINS will take these concerns into account when considering any further procedural objections from Mr Padden's team regarding the agency arrangements.

Yours sincerely,



EMILY HARRISON
Taytime Limited
For and on behalf of Monk Lakes Limited (in liquidation)