



The countryside charity
Kent

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National Infrastructure Planning
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26th April 2022

By email only

**Application for an award of costs against London Resort Company Holdings Ltd
Your ref: BC080001**

Thank you for your letter of 5th April 2022, drawing to our attention the matter of costs awards. This letter is to confirm that we wish to apply for a costs award for the work we have undertaken in preparation for the examination of this DCO application.

CPRE Kent registered as an Interested Party (ref 20027895) in March 2021 and has engaged in the application process alongside other interested parties such as Buglife, KWT and RSPB.

We are a membership charity with only five members of staff, reliant on our members and supporters for the work we undertake in fulfilling our charitable objectives. The extensive preparatory work that was necessary for us to be ready to participate effectively in the examination was wasted time which diverted our attention away from other significant campaign priorities in our workload.

London Resort acted unreasonably in that they consistently ignored our email requests to be considered as a consultee with the same standing as RSPB, Buglife and KWT (ignoring, too, the request from RSPB to have CPRE Kent considered as such a consultee). They were also unreasonable in the continued lateness of submission of many important documents (and indeed entirely failing to submit some). Moreover London Resort's letter of 29th March 2022, confirming the withdrawal of their application, is at odds with their earlier assurances that the designation of part of the site as a SSSI would not materially affect their application: their letter of withdrawal finally acknowledges that the SSSI designation is one of the matters that '*cannot be addressed through the current submission*'.

We do not directly charge the benefactors of our charitable work and as such differ from our partners in not having a set chargeable day rate for our staff time and expenses. The paid staff members who worked on this attract a range of salaries and therefore their time is costed at the relevant costs to the charity: we can apply breakdowns of these details and direct expenses on request.

We therefore apply for a reimbursement of costs directly related to preparation for examination. We have costed only those elements of staff time and expenditure that were directly related to our assessment of and reaction to the application documents, not the considerable time and expense

CPRE Kent - The Countryside Charity

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Registered charity (number 1092012), limited company registered in England (number 4335730)

given over to the necessary campaigning and the ancillary activities of the charity: the amount we are actually claiming represents a considerable underestimate of the total time and resource taken up by our necessary engagement with this project.

- Responding to the initial correspondence on the adequacy of the consultation response (January 2021) - **£788**
- Review of initial submission documents (January 2021) - **£2039**
- Preparation of Written Representation (March 2021)- **£783**
- Response to request for extension (May 2021) - **£295**
- Meetings and discussion to produce letters in response to PINS (December 2021-January 2022) - **£686**
- Legal advice for the above (from Richard Buxton Solicitors; estimated amount, invoice awaited) - **£1800**
- Review of revised submitted documents (March 2022) - **£2862**
- Preparation for engaging with DCO examination (March 2022) - **£972**
- Site visits (various) - **£554**
- Travel costs - **£65**
- Printing costs - **£45**

We therefore request a total cost reimbursement of **£11,387**.

Dr Hilary Newport

Director

CPRE Kent, the countryside charity