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Your Ref
BC080001
Our Ref
JNG/TGH/151216.0073
Date
17 May 2022

LondonResort@planninginspectorate.gov.uk

By Email

Dear Mr Mawdsley

The London Resort Development Consent Order Application ("the Application")

National Highways application for award of costs

- 1 We are writing on behalf of our client, National Highways, in response to your letter of 3 May 2022 following National Highways application for an award of costs in relation to the Application.
- 2 You have asked for clarification as to the status of National Highways' cost application in relation to the application made on behalf of the Secretary of State for Transport ("The SoST"). We confirm the position is as set out at paragraph 9(B) of your letter ('*SoST costs application only relates to the costs of the central Department for Transport and so has no bearing on your costs application which relates only to the wholly separate costs of NH*'). National Highways' application and the costs it seeks are entirely separate to the application made and costs sought by the SoST.
- 3 The table at paragraph 3.1 of National Highways' cost application [CAPP-002a] set out plots within the Application's Book of Reference which National Highways has an interest in. Whilst the SoST also has an interest in some of the plots, this is not true of all of the plots. Insofar as both parties hold an interest in the same plot, the interest in land is different, for example National Highways holds the freehold interest as highway authority and the SoST has rights in that land. Fundamentally, National Highways holds land in connection with the Strategic Road Network, whereas the SoST's interest is in connection with HS1 and other rail assets. By way of a transfer deed, made on National Highways' appointment as highways authority, all interests

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held by the SoST in connection with the Strategic Road Network have been transferred to National Highways.

- 4 National Highways has liaised with the SoST and its legal advisors in preparing this response and the response submitted on behalf of the SoST which reflects the mutually agreed position between the parties.

We hope this letter provides the clarification requested but please let us know if you require any further information.

Yours sincerely

[Redacted signature block]

BDB Pitmans LLP

[Redacted contact information]

cc Womble Bond Dickinson for the Department for Transport [Redacted]