



The Secretary of State for Transport
Great Minster House
33 Horseferry Road
London,
SW1P 4DR

Our Ref: LOC.CP0439

Your Ref:

By Email only to:
M60SimisterIsland@planninginspectorate.gov.uk

14th July 2025

Dear Secretary of State,

M60/M62/M66 Simister Island Interchange DCO Application - Frigate Pub, Thatch Leach Ln, Whitefield, Manchester M45 6FW

We act for **Joseph Holt Ltd**, the owner occupier of the abovementioned property. As you may be aware, the Property is affected by the M60/M62/M66 Simister Island Interchange DCO application that has been referred to you for determination.

Our client submitted a written representation to the Examining Authority on 23rd September 2024, which remains outstanding.

Following this representation, my client and the Applicant in principle, agreed terms which would deal with their primary concern about the proposals to acquire interests over their land, which relates to access and permanent access rights for future maintenance of the scheme as indicated in the Hearing Transcript from the CA Hearing held on 24th November 2024.

The Applicant's representative further indicated that it was going to now move forward to draft a legal agreement with the expectation that it would conclude that before the end of the examination.

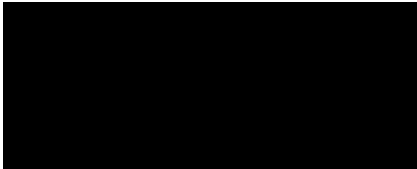
The current position is that nearly 8 months later, the Applicant has still not provided an adequate fee undertaking to progress this matter and by extension has not made meaningful efforts to conclude an agreement in the manner that was indicated to the Examining Authority.

Specifically, this relates to providing an adequate undertaking that is sufficient to cover the true cost of my client's reasonably incurred professional and legal fees. The Applicant's representative has also inappropriately insisted on full narratives being provided to them on the legal and professional advice given. This is subject to a duty of confidentiality and in the case of the former covered by legal professional privilege.

Whilst we understand the Examining Authority's examination of the project was completed on 11th March 2024 and that your letter dated 27th June 2024 seeking (amongst other matters) an update on any agreements that had not been signed by the close of examination is addressed to the Applicant only, we request leave to make a representation to you on this subject prior to today's deadline.

We wish to make it clear that my client's written representations against the Order during the examination period remain outstanding and were never satisfactorily resolved by the Applicant.

We would be grateful if you would take this representation into consideration as part of your overall determination on the application. Particularly if your findings indicate that the position summarised above represents a common theme in the experience of other landowners affected by the project.



Associate Director
For and on behalf of
ROGER HANNAH LTD

Direct line: 

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