

BY E-MAIL

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1 April 2025

Dear Sirs

**THE VPI IMMINGHAM LLP (LAND AT ROSPER ROAD) COMPULSORY PURCHASE ORDER
2024 - LAND NEGOTIATIONS**

We refer to the Statement of Case dated 13 March 2025 submitted on behalf of your client Phillips 66 Limited ("**P66**"), and in particular to paragraphs 8.6 and 8.8, and are writing to reiterate our client's position.

VPI Immingham LLP wishes to negotiate with P66 on an agreement for the acquisition of the land interests required to facilitate the Proposed Development and is prepared to immediately re-commence negotiations for the lease of the Order Land.

The P66 Statement of Case states at paragraph 2.24 that VPI is using the compulsory acquisition process as a means to pressure P66 into agreeing terms in the ESA that are commercially unacceptable to P66 and further "*VPI has indicated to P66 that if P66 is willing to accept its favoured ESA terms, VPI would be willing to withdraw the CPO*".

VPI is willing to re-enter land negotiations today with no conditionality or link to the ESA. To date your client has been unwilling to separate the land negotiations from the ESA negotiations and we refer to email correspondence from P66 dated 27 November 2024 at 10:08 confirming the same.

It is clear from the ongoing ESA negotiations that our respective clients remain considerably far apart – the latest position being that your client refused our client's latest amended terms on Friday 28 March 2025. VPI is willing to either continue negotiating the ESA separately from the land negotiations or pause the ESA negotiations completely until the land negotiations are resolved, to enable the parties to conclude each of the agreements in isolation.

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Please confirm if your client's position remains that the grant of a lease is conditional on the satisfactory completion of the amended ESA.

Yours faithfully

Pinsent Masons LLP

Encs