



Pinsent Masons

BY E-MAIL

FAO: Tom Gray
Burgess Salmon LLP
1 Glass Wharf
Bristol
BS2 0ZX

Your Ref
Our Ref: 155584860.1\668873.07012

DDI +441612348247

E ross.corser@pinsentmasons.com

11 April 2025

Dear Sirs

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

We acknowledge your letter of 9 April and note the contents.

We refer to the Statement of Case dated 13 March 2025 submitted on behalf of your client Phillips 66 Limited ("P66"), and in particular the statements made in respect of the P66 Pipeline Corridor shown on the VPI Site Plan on drawing number 215005-00703-00-CI-DPP-00013 Rev 2 at Appendix 1 of the P66 Statement of Case.

Paragraph 5.5 of the P66 Statement of Case states that:

"A key strip of land within the southernmost part of the Order Land has been set aside by P66 to allow connection between the Humber Refinery and other P66 owned land beyond the Order Land. Several projects are dependent on this corridor and complex agreements recording the interests of the involved parties are significantly progressed and, in some cases, already in place."

Paragraph 5.11 of the P66 Statement of case states that:

"The Order seeks freehold rights over this land which would prevent any future projects which rely on the P66 Pipeline Corridor and cut off the Humber Refinery from other P66 owned land."

The Acquiring Authority has exchanged an option with Harbour in respect of the land it requires in the southernmost part of the Order Land, to enable the delivery of the Viking CCS Pipeline. As you will note, Harbour has now withdrawn its objection to the Order. The Acquiring Authority does not consider that the Order prejudices delivery of any planned project referred to in P66's Statement of Case but with a view to narrowing the issues in dispute between the parties, is willing to offer the corridor of land required for the P66 Pipeline Corridor back to P66, or rights over it,

Pinsent Masons LLP

3 Hardman Street Manchester M3 3AU

T +44 (0)161 234 8234 F +44 (0)161 234 8235 DX 14490 Manchester 2

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once VPI's temporary works on the land have been completed in connection with the Proposed Development and subject to the rights granted to Harbour and will otherwise work collaboratively to ensure mutual delivery of viable projects on the P66 Pipeline Corridor.

Yours faithfully

Pinet Masons LLP