



For the attention of Ross Corser
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Our ref: AM16/39251.70/MINHI

12 May 2025

When telephoning please ask for: Alex Minhinick

Dear Pinsent Masons LLP

The VPI Immingham (Land at Rosper Road) Compulsory Purchase Order 2024 - Land Negotiations

We write in response to your letter of 2 May 2025.

As noted in the Witness Statement of Mike Wailes at paragraph 10.7, it is the case that compulsory purchase orders can be promoted with rights in land sought for temporary, construction works. Examples of such cases are included at the Appendices to the Witness Statement of Mike Wailes (MW 07a, MW 07b, MW 07c). The Objector disagrees that a different, more intrusive, approach should be taken in this case and considers that suitable rights to undertake construction works could be sought via the means of rights packages as opposed to freehold acquisition.

The purported offer referred to in the 11 April 2025 and 2 May 2025 letters has still not been substantiated by the Acquiring Authority and until that is made clear to the Objector, the offer cannot be meaningfully considered. We welcome this detail from the Acquiring Authority.

Yours faithfully

A handwritten signature in black ink that reads "Burgess Salmon".

BURGESS SALMON LLP

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