

From: [REDACTED]
To: Immingham.OCGT
Cc: [REDACTED]
Subject: Response for Deadline 3a - on behalf of the Hornsea 2 Companies [S+W-LegalDiv.FID5120649]
Date: 31 October 2019 12:44:00
Attachments: [REDACTED]

Dear Sirs

Please find attached the response to ExA's Request for Further Information on behalf of our client the Hornsea 2 Companies in relation to Deadline 3a.

Please contact me if you require any further information.

I would be grateful if you could confirm receipt of this email.

Kind Regards

Kenna

Kenna Bisset
Trainee Solicitor, Environment and Planning
Shepherd and Wedderburn LLP

[REDACTED]
www.shepwedd.com

The image shows a promotional banner for Shepherd and Wedderburn's 250th anniversary. The top part is a dark blue bar with the text "250 years of Trust + Innovation" on the left, the firm's logo "SHEPHERD WEDDERBURN" in the center, and "250 YEARS" on the right. Below this is a white bar with the text "SCOTLAND IN 2050: REALISING OUR GLOBAL POTENTIAL" and a link "Click here to download the final report". To the right of the white bar is a small image of the report cover, which features a red and white design with the title "Future of Aberdeen Region" and a picture of a cityscape.

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SHEPHERD+ WEDDERBURN

OUR REF 00816.9/SM
YOUR REF
31 October 2019

BY EMAIL

National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Sirs

**Application by VPI Immingham B Ltd for an Order Granting Development Consent for the VPI Immingham OCGT Project
Written Response to Deadline 3a**

We write on behalf of Optimus Wind Limited, Breesea Limited, Sonningmay Wind Limited and Soundmark Wind Limited (together the "**Hornsea 2 Companies**") following the issue of the Notification of change to the Examination Timetable and Request for Further Information.

1a.1.8. Please provide an update on discussions and give an indication of whether there is likely to be a need to hear oral evidence on any outstanding matters related to CA or TP. If so, please indicate the matter(s) upon which it is considered that oral evidence should be heard.

We are still in discussions with the Applicant with regards to both a side agreement and protective provisions. These discussions have not progressed materially since the oral hearings but we remain hopeful of reaching agreements on protections which will provide sufficient comfort for the Hornsea 2 Companies in due course. We are not however, currently in a position to confirm if or when this agreement will be achieved.

We do not, at this stage, consider it necessary to set further hearings to hear oral evidence in respect of our objection and consider that supplementary points can be made in writing. We reserve our position however to attend any future hearings which the Examining Authority considers it appropriate to set.

Yours faithfully



Scott McCallum
For and on behalf of Shepherd and Wedderburn LLP



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