

# Rampion 2 Wind Farm Category 4: Compulsory Acquisition

Land Engagement Reports: Ancleggan Limited

Date: August 2024 Revision B

Application Reference: 4.6.11 Pursuant to: The Infrastructure Planning (Examination Procedure) Rules 2010, Rule 8(1)(c)(i)

Ecodoc Reference: 005265883-02

#### **Document revisions**

Revision	Date	Status/reason for issue	Author	Checked by	Approved by
Α	09/07/2024	Deadline 5	Carter Jonas	RED	RED
В	01/08/2024	Deadline 6	Carter Jonas	RED	RED

LANDOWER / LAND INTEREST NAME:	Ancleggan Limited	URN on LRT:	014
AGENT:	One Planet Developments Limited	Relevant Rep Ref:	RR-012
PROPERTY NAME:	Land to the North East of Bolney (WSX22448) 5.27 acres potentially affected (currently within DCO Order Limits)	Written Rep Ref:	REP1-066 PEPD-060 REP1-065 REP3-091 REP3-092 REP4-098
LAND INTEREST:	Category 2 Works 19 – Onshore Works Connection	PLOT No:	34/19, 34/20

#### STATUS

The Applicant understands that the land Interest 'Ancleggan' has an option to secure a lease over the land to the north east of Bolney in the event that it determines to proceed with the development of a battery storage scheme, should the scheme secure planning consent. The Applicant has been engaging directly with Ancleggan Limited's representatives since 9th February 2022.

The DCO order limits in this location impact approximately 40% of the land subject to the One Planet battery storage scheme, albeit the working corridor through the land is likely to be 30-40m and consist pf a permanent easement of 15m.

The refinement of the DCO order limits to the working corridor is dependent on several factors including, the design of the connection into Bolney NGET substation, protective provisions for construction through an area occupied by a complex and intensively located network of buries services and other environmental constraints such as ecological features. The Applicant has also been engaging with the neighbouring landowners and NGET in relation to their landholdings since 2020/2021. The engagement with these landowners has demonstrated an ongoing uncertain picture of development proposals for energy projects in the vicinity of Bolney which add to the requirement for flexibility in the Applicant's project to protect against undeliverability of the Rampion 2 proposed development.

The proposed Ancleggan Development substation is proposed by Ancleggan to be in the western part of the Ancleggan Development Land which could potentially conflict with the Rampion 2 onshore cable route due to the limited physical 'gap' between the Bolney Substation infrastructure and the existing Rampion 1 substation and the presence of a number of existing buried services within this gap which needs to be passed to access the Bolney extension area.

The Applicant has proposed Ancleggan Ltd consider a pragmatic step to move the battery storage substation so as not to be sited directly in line with Ancleggan's suggested refined Rampion 2 'green' cable route, however this has not been done.

The Rampion 2 DCO order limits refinements will ultimately be progressed and included in stage specific management plans in accordance with Requirement 23 of the Draft Development Consent Order (DCO) [PEPD-009] following: - NGET's finalisation of the Bolney Extension connection point design and subsequent cable design work;

-cable route refinement in light of pre-construction environmental surveys;

-agreed construction designs and methods to ensure the protection of existing infrastructure in the ground (some of which might move between now and construction of the schemes). These services may have a bearing on the required Rampion 2 cable routeing. However, due to the unique and complex nature of the constraints, features and development proposals in this area, the Applicant is proceeding with targeted concept level cable design work utilising the survey data it has secured to date. It is expected that this design work will result in a more detailed picture of potential cable design, potential protection provision measures and associated land requirements. The Applicant is at this later stage likely to be able to determine if some areas will be required for construction only and confirm the ability to release temporarily required land back to the freehold owner further to construction.

The Applicant has communicated to the Examination and to Ancleggan the requirement for the NGET design work in progress, subsequent cable design work by the Applicant and the likely timescales for delivery. The Applicant has also communicated to the Examination that the land in the south western corner of the Ancleggan land is likely to be critical to the proposed route through to the Bolney NGET Extension in its location east of the main Bolney Substation due to the presence of existing operational Bolney substation infrastructure to the west of the Ancleggan land refining the order limits too soon would involve the following risks:

- insufficient / inappropriate area for cable construction in light of existing buried services and therefore inability to construct the proposed development without securing further consents and land rights

-insufficient/ inappropriate area for measures required through agreement of protective provisions and therefore inability to construct the proposed development without securing further consents and land rights

- significantly high compensation payable to 3<sup>rd</sup> party green infrastructure developers as a result of currently unanticipated proposals being consented (e.g the previously proposed grid stability scheme progressing to planning application and consent)

The Applicant notified the Land Interest of a Change Notification to the DCO Order Limits on 28th June 2024. Ancleggan acknowledged the amendment but requested further refinement to reduce further potential impacts on the battery storage scheme on 10<sup>th</sup> July 2024. The Applicant responded providing an update on the cable design study work being carried out (which is expected in September 2024) on 23<sup>rd</sup> July 2024 and provided the Applicant's proposed commitments to reduce impacts requesting Ancleggan respond with their comments and any further/alternative proposals.

#### NEGOTIATIONS FOR VOLUNTARY ACQUISITION OF RIGHTS

No heads of terms have been sent to Ancleggan Ltd as they are a category 2 interest. The Applicant is anticipating that a compromise cable route can be found further to the detailed cable design work that would work for both parties. Updates will be provided until detailed interim cable design work is completed (expected September) and beyond.

#### PROGRESS OF ENGAGEMENT FOLLOWING CAH 1

The parties have entered into an Non-Disclosure Agreement (NDA) which limits the detail that the Applicant is able to report.

Emails were sent by the Applicant to Ancleggan representatives on 22/5/2024 and 6/6/2024 to arrange a Teams call to discuss project updates. A Teams call was held with Ancleggan representatives on 7<sup>th</sup> June 2024 and with Mr Worsley (freehold owner and Ancleggan representative on 10<sup>th</sup> June as he was unable to attend the teams call on 7<sup>th</sup>).

At the teams call on 7<sup>th</sup> June, the Applicant communicated that it was reviewing the DCO order limits, and a DCO Order limits amendment was being considered by the Applicant's project team ahead of a formal letter on 28<sup>th</sup> June which was issued to all Land Interests who were impacted by potential DCO change requests. Further content is confidential.

An Email dated 25/6/24 was sent to Ancleggan representatives to inform them about the pending change to the DCO Order limits and an update on ongoing engineering work to attempt to refine the area required for temporary works on a plan. The email sets out further project information not appropriate for inclusion. The Applicant has confirmed that it would be prepared to commit to providing a plan of temporary and permanent works on completion of the interim cable design work following completion of the concept design study in September 24.

Email dated 28/6/2024 to include the pending DCO change request form.

The Applicant highlighted at the CA Hearing 1 that there have previously been early stage developments in the field to the west for a grid stabilisation scheme that has not been progressed. This early stage development had led to some early indicative cable routeing designs by the Applicant in the northern part of the DCO limits. The Applicant noted that the One Planet planning application has been in the planning system for 14 months and is not yet granted. There is no planned committee date for its consideration. The Applicant is aware that there are a number of other battery storage proposals in the vicinity at different stages of planning, likely due to perceived grid connection opportunities. Even if the Applicant was in a position to do so with regard to the cable design, refining the DCO limits to 'fit' with the One Planet planning application would be premature.

Since the CA Hearing 1, the Land Interests on adjoining land to the west have contacted the Applicant to confirm that a new option is being agreed between the freeholder and the Developer and that they would be proceeding to promote a new grid stabilisation scheme. The Developer indicated that they would be progressing with submitting a new scoping report in late summer and targeting a planning application submission by the end of the year. The Applicant maintains the position therefore that the future development picture is unclear and that a degree of flexibility to account for this is appropriate.

The Applicant received an email from Ancleggan representatives on 10<sup>th</sup> July 2023 querying the scale on the plan included in the proposed DCO change correspondence. Ancleggan representatives also raised a point that the easement section ultimately required by the Applicant would be considerably narrower than the 20m permanent cable easement corridor which the Applicant requires for the four bundles of cable forming the route between the coast and Oakenden substation.

Ancleggan representatives included a snapshot of their preferred routeing and land take which they stated would also have the benefit of minimising the effect on the mature oak trees in accordance with the Applicant's environmental statement.

The Applicant emailed Ancleggan representatives on 23<sup>rd</sup> July 2023 including the new revised works plan covering the Ancleggan land and confirming that the Applicant has commissioned an interim cable design study to confirm the engineering requirements for the Rampion 2 cable in this location. This work will provide the basis for the alignment of the cable

construction corridor design and therefore should provide further information regarding temporary and permanent works required.

The design work brief has included a requirement to reduce impacts on the One Planet scheme where practicable and subject to the requirements of the Rampion 2 project.

- Rampion 2 will share the key design work outputs with Ancleggan and hold a detailed interface meeting with engineers and designers within 3 weeks of completion of the work.
- It is expected that this work will be completed in Sept 2024

The Applicant believes that there is a pathway for the potential conflict between the One Planet and Rampion 2 projects that could be managed if One Planet project secures consent if Rampion 2 is constructed first. If the One Planet project reaches construction stage first, conflicts are more acute as the temporary land requirements for Rampion 2 are likely to be significantly greater than the permanent land take requirements. The Applicant will continue to seek to secure agreement to a mutually acceptable arrangements further to the interim cable design work in September 2024.

#### LANDOWNER ENGAGEMENT (2021 to 2024)

The Applicant has been engaging directly with Ancleggan Limited's One Planet representatives since 9th February 2022, shortly after Ancleggan concluded the Option Agreement with Worsley in December 2021. The freehold owner of the Land – Worsley requested that Ancleggan Limited representatives attend a Rampion 2 progress update call on 29<sup>th</sup> July 2022 that had been arranged by the Applicant. Regular meetings have taken place since that time, in September 2022, December 2022, February 2023, April 2023, and June 2023 mainly to discuss the progress of both projects.

A site visit took place on 19<sup>th</sup> July 2023 with representatives from Ancleggan and the Applicant and their land agents. The treeline between the Ancleggan land and the land to the west was viewed and the pinchpoint into Rampion 1 OFTO land to the south. Overhead services were looked at and a discussion held about constraints mapping.

A teams call was held on 3/8/23 to update the progress of each planning application, Rampion 2's position with regard to NGET design, constraints work to be prepared by the Applicant and One Planet's preferred "green" cable routeing which enters the land with the Ancleggan interest to further to the south than the earlier indicative cable centreline provided by the Applicant to Mr Worsley. The agenda for the call included Rampion 2's Works Plans for discussion. The Applicant noted that there are a number of buried and overhead services and lines in the Ancleggan/TC Rampion 1 OFTO/ NGET area which require approval of protective provisions or crossing agreements. The requirements and technical measures to deliver agreement to those protective provisions was noted as not being yet fully known and would not be until protective measures are designed and agreed.

An email was sent to Ancleggan by the Applicant on 21/9/23 confirming signature and completion of NDA to facilitate information sharing. The Applicant also sent to Ancleggan CAD files of the buried services in to the south of the Ancleggan land as had been requested by them.

A Teams calls took place on 14/11/2023. The Team's call was followed up with an email from the Applicant to Ancleggan representatives dated 16/11/2023 with an action list and included contact details for the Applicant's NGET's contact.

A Teams call took place on 9/1/2024 took place with the Applicant and Ancleggan representatives. The Applicant reported that there had not been much movement on the NGET side since before Christmas and the Applicant was awaiting NGET design which was expected to be delivered in February.

A Teams call with The Applicant, Ancleggan representatives and Charles Worsley attending was held on 13/2/2024. The call was to discuss One Planet – planning and grid progress update, Rampion 2 examination – timeframes and deadline dates, and the constraints plan. An update on NGET design work was provided by the Applicant.

A Teams call was held on 19/3/2024 with the Applicant, Ancleggan representatives and Charles Worsley attending. Updates were exchanged on the Rampion 2 and One Planet planning progress. An update was given by the Applicant on the (limited) progress by NGET on the Bolney extension design.

An email was sent from the Applicant to Ancleggan representatives dated 10/4/2024 following up Ancleggan's rationale for no changes being made to the One Planet scheme further to The Rampion 2 letter to Mid Sussex District Council for example specifically mentioned the location of the One Planet substation as being problematic.

A Teams call took place on 11<sup>th</sup> April 2024. The discussion included an update on the NGET Bolney extension and One Planet planning application progress. The Applicant's email 10/4/24 regarding whether One Planet had considered movement of their battery storage layout – in particular the substation in light of Rampion 2's representations to the planning application was discussed. The Applicant notes the positioning of the substation directly on the Ancleggan preferred Rampion 2 'green route' and the fact that the Applicant has accepted and noted the benefits of the Ancleggan preferred route submitted to the

Examination. The Applicant notes that there is potential that the Rampion 2 cable would be constructed first, followed by One Planet which is likely to result in significantly reduced impacts on the One Planet scheme if consented.

An email was sent from the Applicant to Ancleggan representatives on 22/4/24 forwarding a link to the Applicant's relevant representations submitted to PINS. The Applicant highlighted its acknowledgement of the merits of the Ancleggan refined route. Further contents in the email are confidential.

Prior to the CA hearing 1, The Applicant updated the latest position with NGET stating that "Whilst the base design is not yet completed NGET have shared their progress with the Applicant who is expecting the issue of this NGET preferred base design shortly."

#### ALTERNATIVES / REFINEMENTS- REVIEWED AT THE LAND INTEREST'S REQUEST

A plan with an indicative cable routeing 'blue line' within the Development Consent Order (DCO) order limits for the onshore connection works was shared with the freehold owner of the land Charles Worsley in July 2023. The cable routeing shared was indicative only. One of the purposes of sharing the plan was for calculating likely indicative easement payments and it was communicated to the freehold owner and the Land Interest that it is highly likely to change due the constraints and features within the DCO Order Limits which were the subject of ongoing Environmental Assessment.

Ancleggan representatives communicated at a site visit on 19th July 2023 that a cable route through the existing gap in the hedgerow would have the least impact on the One Planet scheme. The applicant explained that the Rampion 2 indicative cable route showed by the blue line did not represent the Applicant's current preferred route and that some further constraints mapping work could be carried out and might help with communications. Further environmental work through the Environmental Assessment demonstrated that there are merits to the Ancleggan preferred Rampion 2 cable "green route" in terms of minimising tree loss. This was communicated to Ancleggan in the later teams' meetings in January 24 in the context of the notable lack of activity from the adjoining early-stage energy development scheme.

The Applicant's latest position regarding the proposed Rampion 2 cable refinement is set out in the Applicant's response to Affected Parties Written Representations (REP2-028). The Applicant agrees with the assessment of the effects of the proposed cable route described by Mr Howell. **Appendix 22.16: Arboricultural Impact Assessment, Volume 4** of the Environmental Statement **[APP-194]** identifies the potential loss of several mature trees in that location. The potential effects of cable installation through the belt of trees have not been downplayed, the trees were considered by the Applicant to be of high quality (Category A) in accordance with BS 5837 due to their collective landscape contribution (Sub-Category 2).

The Applicant notes that in Mr Howley's assessment the same trees (those that would be removed to facilitate the proposed cable crossing) are of moderate quality (Category B). The Land Interest states that "*high arboricultural impacts for the sites arboricultural resource could easily be avoided by utilising an alternative cable route.*" The cable route is shown green on the plans and photo. The Applicant notes that what is described as an 'alternative' cable route is within the DCO order limits. It is therefore not considered by the Applicant to be an 'alternative' but a potential refinement to the DCO red line and as such will be referred to as the "refined route". The Applicant notes that the blue route shown on the plan and photo is a previous draft indication of cable route refinement but it currently carries no more weight by the Applicant than the green route identified by the Land Interest. The Applicant is therefore not at this stage putting forward a case that this route is undeliverable or unsuitable, indeed as noted to Ancleggan previously, the Applicant considers there to be merits to the proposed refinement in terms of lesser impacts on tree removal. However, the Applicant is not in a position to refine down the construction corridor for the electrical connection works at this stage. The reasons for this are set out in the **Applicant's Response to the Relevant Representations [REP1-017]** Table L115 Applicants Response to Ancleggan Limited Limited [RR-012] under "Consideration of Alternatives, Constraints and NGET Grid Connection Agreement and Design work". These reasons have been updated in REP4 – 074: CA 1 hearing actions as set out below.

Position Update NGET have been progressing the design for the Bolney Extension on behalf of the applicant and have confirmed the location to the east of Bolney substation for the AIS infrastructure. NGET has now shown the Applicant a working draft 'base design' drawing for the extension area. NGET are expecting to have a finalised design in the last quarter of 2024. Whilst the final design is not yet completed, the Applicant is now able to utilise the known elements to progress interim cable design work for the Proposed Development from the edge of the Bolney extension area to (and including) the Worsley land over which Ancleggan has an option. This design work is expected to be prepared by September and the consultants have been instructed to consider options that reduce the impact on the Ancleggan land where practicable.

#### IMPACT ON LAND INTEREST

- The Land Interests has a Category 2 interest in land to the north east of Bolney NGET substation. The Applicant understands that the Land Interest has an agreement with the freeholder Mr Worsley for the promotion of a battery storage scheme.
- If the battery storage scheme "The One Planet battery storage scheme" is granted planning consent and constructed ahead of the Applicant's start of construction, the Applicant would require some parts of the One Planet development to be removed to facilitate construction of the Rampion 2 cable.

#### PROPOSED MITIGATION

The extent of the DCO order limits and flexibility is required in this location due to the location being characterised by a greater number of in particular physical and engineering constraints and features.

The Rampion 2 cable route will be designed in this location to minimise the impact on the Ancleggan land subject to consideration of these constraints which include:

- the existing Bolney NGET substation and proposed connection point within Bolney extension
- Buried services owned by NGET, multiple high voltage electricity overhead transmission lines
- UK Power Networks (UKPN)
- Other utilities running east-west to the south of the Ancleggan land and through the Ancleggan land e.g. Rampion 1 OFTO

#### OUTSTANDING ISSUES DELAYING CONCLUSION OF VOLUNTARY AGREEMENT

- Ancleggan Ltd has requested a refined cable roueting
- The Applicant has requested Ancleggan amend their battery storage layout to move the substation away from Ancleggan's preferred "green cable route" as the Applicant considers it is unreasonable for Ancleggan Ltd to promote their scheme and a Rampion 2 cable routeing option which maximises the conflict between the respective proposals. This has been communicated by the Applicant to One Planet since the initial objection was submitted to the Ancleggan 'One Planet' planning application by the Applicant due to these conflicts. Copies of the letters are attached to the Applicant's Response to Written Representations at Appendix 13: Rampion 2 Objection One Planet Planning Application (1) and 14 Rampion 2 Objection One Planet Planning Application (2).
- The Applicant believes there is the potential for Ancleggan Ltd to redesign the battery storage project layout once the Rampion 2 interim cable design work has been completed. The Applicant notes that there is potential that Rampion 2 cable would be constructed first, followed by One Planet
- The Applicant notes that the substation is particularly problematic and movement to a more appropriate location would be a pragmatic amendment in light of current constraints. The Applicant believes it is open to Ancleggan representatives to amend the battery storage layout once there is sufficient certainty in Rampion 2 design refinement further to the design work referred to above and in the bullet point below.
- The Applicant is carrying out interim design work which will help refine the extent of permanent and temporary land rights required. It is expected that this work is completed in Sept 24
- On this basis, it is the view of the Applicant that the conflict between the One Planet and Rampion 2 projects could be managed if One Planet secure planning consent. The Applicant will seek to secure agreement to a mutually acceptable arrangement which can be reflected in key terms with the freehold owner Mr Worsley.

CJ Negotiations/Contact Summary	Date of Contact	Method of Contact
TEAMS Call with Charles Worsley, Michael Campbell (One Planet), David Peill (One Planet), James D'Alessdandro (RWE), Simon Mole and Nigel Abbott (CJ)	09/02/2022	Microsoft Teams Call
Notes from TEAMS call on 9th/ Feb	09/02/2022	Microsoft Teams Call
Attendees: Charles Worsley (Landowner), Michael Campbell (One Planet), David Peill (One Planet), James D'Alessandro (RWE), Simon Mole and Nigel Abbott (Carter Jonas)		
CONSULTATION RESPONSE from One Planet	05/04/2022	Letter
EM to David Peill (One Planet) re seeking to arrange TEAMS call	20/04/2022	Email
EM from David Peill (One Planet) re next meeting / update	27/06/2022	Email
EM to David Peill (One Planet) re for his attendance at the next catch up meeting Proposed agenda: 1.Recap on the decision that Oakendene will be the substation location 2.Explain our current thinking about our cable route across Mr Worsley's land 3.Talk Mr Worsley and One Planet through the attached set of slides that explain the cable route options in the "pinch point" area at Bolney (in order to avoid Rampion 2 and One Planet having a clash of cable routes in this area). 4.Explain our plans for survey works at the cable "pinch point". 5.Discuss other points including: i. The potential for gaining access for the "pinch point" surveys via Mr Worsley's land ii. The potential for the Rampion windfarms and the One Planet scheme to cooperate in providing a "Black Start" capability to National Grid	20/07/2022	Email
MEETING NOTES of One Planet Meeting on 29 07 22	29/07/2022	Meeting
MEETING NOTES of One Planet Meeting on 30 09 22	30/09/2022	Meeting
MEETING NOTES of One Planet Meeting on 30 09 22 [Revised 25 10 22]	25/10/2022	Meeting
EM from Charles Worsley re One Planet Update Call	01/12/2022	Email
EM to Charles Worsley re One Planet Update Call	01/12/2022	Microsoft Teams Call
MEETING NOTES of One Planet Meeting on 01 12 22	01/12/2022	Meeting
MEETING NOTES of One Planet Meeting on 09 02 23	09/02/2023	Meeting
EM to Charles Worsley re One Planet Notes from Call of 09 02 23	13/02/2023	Email
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EM to David Peill (One Planet) re One Planet - On- line meeting 02 08 2303/08/2023Email
EM from David Peill (One Planet) re One Planet - On- line meeting 02 08 2307/09/2023Email
EM to David Peill (One Planet) re One Planet - On-12/09/2023Emailline meeting 02 08 23Email
EM from Michael Campbell (One Planet) re One14/09/2023EmailPlanet - On-line meeting 02 08 2314/09/2023Email
EM from David Peill (One Planet) re One Planet - On- line meeting 02 08 2320/09/2023Email
EM to David Peill & Michael Campbell (One Planet)21/09/2023Emailre One Planet - On-line meeting 02 08 2421/09/2023Email
EM from Michael Campbell (One Planet) re One21/09/2023EmailPlanet - On-line meeting 02 08 2321/09/2023Email
EM from David Peill (One Planet) re Cable Route03/10/2023EmailSurvey Data & MoU draft03/10/2023Email
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EM to David Peill (One Planet) re Cable Route07/11/2023EmailSurvey Data & MoU draft07/11/2023Email

EM from Charles Worsley re Cable Route Survey	07/11/2023	Email
Data & MoU draft		
EM from Robert Crawford Clarke re Cable Route	08/11/2023	Email
Survey Data & MoU draft		
EM to David Peill & Michael Campbell (One Planet)	09/01/2024	Email
re Rampion 2 Progress Call		
EM to David Peill & Michael Campbell (One Planet)	10/04/2024	Email
re Call 11/4/24 - MOU Rampion 2 and One Planet		
MEETING NOTES of One Planet Meeting on 11 04 24	11/04/2024	Other
EM to David Peill & Michael Campbell (One Planet)	22/04/2024	Email
re Rampion 2 - One Planet Development Proposals		
EM to David Peill & Michael Campbell (One Planet)	09/05/2024	Email
re Rampion 2 - One Planet Development Proposals		
EM to David Peill & Michael Campbell (One Planet)	16/05/2024	Email
re Rampion 2 - One Planet		
EM to David Peill & Michael Campbell (One Planet) &	22/05/2024	Email
Charles Worsley re One Planet - Rampion 2		
EM from Michael Campbell (One Planet) re One	22/05/2024	Email
Planet - Rampion 2		
EM from Michael Campbell (One Planet) re One	03/06/2024	Email
Planet - Rampion 2		
EM to Michael Campbell (One Planet) re One Planet -	06/06/2024	Email
Rampion 2		
EM from Michael Campbell (One Planet) re One	19/06/2024	Email
Planet - Rampion 2		
EM to Michael Campbell (One Planet) re One Planet -	25/06/2024	Email
Rampion 2		
EM to David Peill & Michael Campbell (One Planet) &	28/06/2024	Email
Charles Worsley re One Planet / Ancleggan -		
Rampion 2		
EM from Michael Campbell (One Planet) to Rampion	10/07/2024	Email
2		
EM from Rampion 2 to One Planet	23/07/2024	Email
	20,01,2024	

All engagement correspondence referred to within this Land Engagement Report can be provided upon request. Please note: there may have to be redactions in order to comply with confidentiality between parties and GDPR legislation.