

Dogger Bank South Examining Authority  
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Our reference 005405067-01  
Your reference EN010125  
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20 February 2025

Dear Ms Dowling,

**Dogger Bank South Offshore Wind Farms Project**

**PINS Reference: EN010125**

**Deadline 2 Cover Letter (Revision 2)**

This letter summarises and explains the content of the Applicants' submissions to Deadline 2 of the Examination. Documents will be described in the order requested by the Examination Timetable contained in the **Rule 8 letter** [PD-011]. It also includes the Applicants' response to the **ExA's Rule 17 letter of 11 February 2025** [PD-013], and **Natural England's letter of 29 January 2025** [REP1-063].

**Response to Natural England's engagement throughout examination**

Having reviewed **Natural England's letter of 29 January** [REP1-063], the Applicants are concerned that Natural England's review of compensation and offshore ornithology may not be available until after the setting of the ExA's First Written Questions. This removes an ExA opportunity to raise questions regarding Natural England's position on matters in the Written Questions. This is compounded by the fact Natural England will not attend the hearings and therefore the ExA cannot raise questions of Natural England at virtual hearings or make progress on their issues in this forum.

The Applicants have engaged with Natural England for several years on this project via the discretionary advice service and have continued to engage on a monthly basis following submission of the application. The Applicants understand and sympathise with Natural England's resource constraints, and whilst these constraints are a frustration to the Applicants, we are keen to find an effective, efficient and expeditious way of working with the ExA and Natural England during examination to ensure that remaining matters material to the ExA's recommendation and subsequent Secretary of State decision are identified and resolved before the end of examination to prevent a potential delay to determination.

The Applicants highlight **Natural England's Risk and Issues Log** [REP1-067] has not been updated with respect to offshore ornithology and compensation matters at Deadline 1 and may not at Deadline 2. Therefore, with regards to Habitats Regulations Assessment and associated compensation measures, the Applicants have set out in **Appendix A** below the key issues where the Applicants understand broad agreement to be in place with Natural England and where the Applicants anticipate further discussion and review during examination to be required for these topics. This includes the key questions the Applicants would respectfully request the ExA to ensure are prioritised in Written Questions and hearings. It is of specific concern that Natural England are able to provide their input on impact numbers and compensation requirements in good time to enable matters to be examined and addressed/closed out/agreed during examination.

It is also important to note that the Applicants have been working at pace to provide updates to assessments and compensation proposals pre-examination (upon Natural England's request), and these have been provided in a 'tracked' format specifically to facilitate prompt review. 'New' submissions related to ornithology and benthic compensation topics are not sizeable documents and should not be overly burdensome to review and comment upon. The Applicants will continue to make every effort to provide information requested by the ExA and Natural England as quickly as possible to help inform the examination process.

### **Comments on the Written Representations**

These are provided in a single document, **The Applicants' response to Written Representations** (document ref: 12.2).

### **Any further information requested by the ExA**

The ExA requested the Phase 2 Archaeological Trial Trenching reports in their **first Rule 6 letter** [PD-002]. While several interim reports have been supplied at Procedural Deadline A and on 7 November 2024, the final reports are pending. Artefacts are currently being analysed, and therefore the Applicants anticipate the final report to be available around Deadline 4 in April.

In their **Rule 17 letter of 24 October 2024** [PD-006], the ExA also sought winter viewpoints with visualisations of the substation area. These have now been provided as part of an updated **Chapter 23 Landscape and Visual Impact Assessment - Figure 23-1 to Figure 23-15** (document ref: 7.23.1), which has also been updated to reflect the effects of the accepted Change Request, as outlined further below.

In accepting the Change Requests, the ExA sought updated documents at Deadline 2 [PD-012]. These are now provided, incorporating updates from the accepted Changes, and arising from the recent hearings.

The **Issue Specific Hearing 2 Supplementary Agenda Questions** [EV5-002] 10.9 sought a revision to **ES Chapter 22** [AS-092] by Deadline 2, which is now provided as outlined in **The Applicants' Responses to Issue Specific Hearing 2 Supplementary Agenda Questions Appendix A Heritage assets, the effects and the attributed level of harm in response to ISH2 10.9** (Document reference: 12.4).

The Compulsory Acquisition Hearing Action Points 15 and 16 [EV3-003] sought an explanation of the methodology used to identify Category 3 Parties, in particular the interrelation with Requirement 21 of the **Draft Development Consent Order** [REP1-004]. This is provided in Appendix B to this letter, and an update to **Book of Reference (Revision 5)** (document ref:4.2) is submitted at this deadline.

The Applicants have also provided the **Case for reduction in Kittiwake Breeding Seasons for ANS installation** (document ref: 12.5) to support the update of the **Updated Project-Level Kittiwake Compensation Plan (Revision 4)**(document ref: 6.2.1) to reduce the number of seasons before first generation that the offshore ANS will be installed.

### Comments on submissions received by Deadline 1

The Applicants are also providing comments on the material provided by Natural England [REP1-063 – REP1-067], the East Riding of Yorkshire Council [REP1-055] and various other submissions in a single document, **The Applicants' Responses to Deadline 1 Documents** (document ref: 12.3).

### Rule 17 letter regarding April hearings

The Applicants' landscape, visual impact and seascape specialists are working on both North Falls and Dogger Bank South offshore windfarms. Therefore the Applicants request that these topics are not scheduled on the same day to facilitate participation in both hearings. As the North Falls hearings are in Essex, a travel day between hearings would be useful. The Applicants also request that any discussion of Transport is held on Wednesday, Thursday or Friday to suit specialist availability.

Please feel free to contact me if you require any clarification regarding the above.

Yours sincerely,



Thomas Tremlett  
Senior Consents Manager  
DBS Offshore Wind Farms

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## Appendix A

### **Key matters requiring resolution during the Examination regarding Offshore Ornithology assessment and compensation**

The Applicants have some concerns regarding the timing of Natural England responses, based on their letter of 29<sup>th</sup> January 2025 [REP1-063], which may affect the ability to reach agreement on key issues by the end of the Examination. To mitigate this, the Applicants would respectfully request the ExA to particularly focus on certain key issues within the compensation and offshore ornithology topics, and the specific elements (provided below) of the compensation plans for:

- Annex I sandbank habitat of the Dogger Bank Offshore SAC (DB SAC)
- Kittiwakes at the Flamborough head and Filey Coast SPA (FFC SPA)
- Guillemot [and razorbills] at the FFC SPA (razorbills are on a without prejudice case).

#### *Annex I sandbank habitat of the Dogger Bank Offshore SAC (DB SAC)*

For the DB SAC the principal compensation proposed by the Applicants in the **Project Level Dogger Bank Compensation Plan** [APP-059] (updated version 2 submitted at Deadline 2) is the designation of a new protected site or extension of an existing site to offset predicted impacts to the DB SAC sandbank feature. This would be delivered strategically, via Defra, through contribution to the Marine Recovery Fund (MRF). This aligns with the **Round 4 Dogger Bank Strategic Compensation Plan (DBSCP)** [APP-060] which was developed by the Dogger Bank Steering Group (which included Natural England). The recent Written Ministerial Statement (Defra, 2025) commits to the delivery of sufficient Marine Protected Area designations and/or extensions to provide strategic compensation for benthic environmental impacts resulting from offshore wind developments. Interim guidance published by DESNZ (DESNZ, 2025) also confirms the eligibility of the Projects, as Round 4 projects, for strategic compensation, through the MRF. As such the Applicants believe that the compensation measure proposed by the Applicants is accepted by Natural England and the delivery mechanism confirmed by Defra and DESNZ, hence this does not need further debate.

There is disagreement between the Applicants and Natural England about whether habitat disturbance effects should contribute to AEOI and therefore the level of compensation required. The Applicants set out their position on AEOI

and rationale on recovery from disturbance in the **Report to Inform Appropriate Assessment Habitats Regulations Assessment - Part 2 of 4 - Annex I Offshore Habitats and Annex II Migratory Fish** ([APP-046, superseded by AS-051]) and provided further evidence in **Review of Evidence on Recovery of Sandbank Habitat Following Habitat Damage** [AS-025]. It is the Applicants' understanding that NE will respond to this at D2. The Applicants consider, based upon pre-application discussions with Natural England (and their position on previous projects), that it is unlikely that there will be agreement on this issue by the end of the Examination. However, given that there should not be disagreement on the impact footprint, merely whether disturbance contributes to AEOI, this issue could be left unresolved at the end of examination. The respective positions will likely be known, evidence may have been provided and the SoS will have the information to make the decision on what should contribute to AEOI. The final quantum of any compensation to be provided (i.e. any ratios applied to the impact footprint) sits outwith the Examination process. Natural England state in their relevant representation [RR-039] that:

*“Ultimately it will be for DEFRA to determine the amount of compensation required, irrespective of what the Applicant has detailed”*

Considering the Applicants' and ExA's preference to resolve issues during examination, we respectfully request the ExA to ask the following questions of Natural England at First Written Questions:

1. Can Natural England comment upon the Applicants' **Review of Evidence on Recovery of Sandbank Habitat Following Habitat Damage** [AS-025] for Deadline 3 (if they have not already)?
2. Can Natural England provide their justification/evidence to support their position that the habitats within Dogger Bank SAC do not recover promptly from disturbance from construction activities?

### *Kittiwakes at the Flamborough head and Filey Coast SPA (FFC SPA)*

For Kittiwakes at the FFC SPA the principal compensation proposed by the Applicants in the **Project-Level Kittiwake Compensation Plan** [APP-052], (updated version 4 submitted at Deadline 2) is the delivery of Artificial Nesting Structure(s) (ANS). This aligns with the primary measure identified by the **Kittiwake Strategic Compensation Plan** [APP-053] and with DESNZ guidance (DESNZ, 2025) which confirmed the inclusion of offshore ANS within the Library of Strategic Compensation Measures and the eligibility of Round 4 offshore wind projects to deliver this measure. Guidance also states that projects wishing to rely on this measure ahead of the MRF being operational need to deliver offshore

ANS on a project led or collaborative basis, and that where possible developers should construct fewer and larger offshore ANS placed in optimal sites. As such the Applicant's believe that the compensation measure proposed is accepted by Natural England as a member of the kittiwake steering group. The delivery mechanism is confirmed by Defra and DESNZ, hence this does not need further debate.

At the point of application the location of the Applicants' ANS had not been identified, however following extensive site selection work since submission, three candidate sites have now been identified to take forward for Site investigation surveys in 2025 (these are provided in the updated **Project-Level Kittiwake Compensation Plan (version 4) (document reference: 6.2.1)** (submitted at Deadline 2)). These candidate sites were selected from Areas of Search which were presented to both Natural England and The Crown Estate in September 2024 (with no major issues raised) and were based on the methodology applied by The Crown Estate in identifying locations within the Kittiwake Strategic Compensation Plan [APP-053]. Based on the SI surveys one or two locations within the candidate sites will be taken forward to Marine Licence application prior to the end of the Examination. Final details of location, capacity, design, and monitoring will be provided in the Project Kittiwake Compensation Implementation and monitoring plan which has to be agreed by the Kittiwake Steering Group post consent (noting Natural England's inclusion within this). Hence these details do not need to be finalised in Examination and the public interest with regards to ensuring adequate compensation is provided for Kittiwake is secured through the DCO wording. The Applicants have however shown that suitable progress towards implementation of these measures has been made.

The impact upon kittiwake has yet to be agreed, updated numbers were provided in **Report to Inform Appropriate Assessment Habitats Regulations Assessment - Part 4 of 4 - Marine Ornithological Features (Revision 3)** [AS-085] based upon comments in Natural England's relevant representation [RR-039]. The Applicants consider that considering numbers in line with Natural England's requested values have been provided alongside the Applicants preference, they should have limited comment.

This leaves two material issues to resolve for kittiwake.

### **Quantum of compensation**

The quantum of compensation is based on two components, mortality (the impact), followed by a second stage to identify the compensation requirement.



The Applicants highlight that Natural England's preference (stated in [REP1-065]) is to use the upper 95% confidence interval (CI) for the estimate of mortality which is effectively double the mortality when compared to the mean value (see Table 9-21 of [AS-086]). This introduces a great deal of precaution into the estimate of mortality, over and above that already within the collision risk assessment as outlined in the **RIAA** [AS-085]. It is important to highlight this precaution, particularly if at a later stage in the process further precautionary multipliers (i.e. ratios) are advocated. The Applicants consider that in all compensation documents the range of inputs (i.e. mean and upper 95% CI) should be retained to ensure that SoS can make an informed judgement in their decision-making.

There is disagreement on the methodology for calculating the scale of compensation required. Natural England have highlighted their preference for the use of the 'Hornsea 3 stage 2 method' [REP1-065] for this step. The Applicants consider the Hornsea Three method to be unsuitable for a number of reasons (stated in [AS-087]) namely, that it is unnecessarily complicated, and includes double-counting of the effects of mortality and thus an overestimation of compensation quantum. In addition the full method is not publicly available such that it can be readily replicated or quality assured. The Applicants had intended to submit further information regarding methodologies for calculating compensation at Deadline 2, however, the delay of Natural England's Offshore Ornithology and compensation written representations has made this challenging. An update will now to be provided at Deadline 3, assuming receipt of these representations with sufficient time to consider them prior to the deadline. If there is no agreement on methodology, the Applicants consider that parallel numbers utilising the Applicants preferred Hornsea 4 method and the Hornsea 3 Stage 2 method can continue to be provided in the **Project-Level Kittiwake Compensation Plan (Revision 4) (Document ref:6.2.1)** and the SoS can make a judgment on quantum as has been the case on previous projects.

### **Timing of installation**

The Applicants understand that there was previously disagreement with Natural England at the Relevant Representations stage regarding the timing of the installation of the offshore ANS. At the application stage, the Applicants identified in the **Project-Level Kittiwake Compensation Plan** (Revision 1) (APP-052] that it was expected the Offshore ANS would be constructed 3 breeding seasons prior to first operation. Natural England disagreed within their Relevant Representation [RR-039], with the Applicants' response to this provided on the 29th October 2024 [PDB-006]. No response on this has yet been received on

this from Natural England. The Applicants have updated the Project-Level Kittiwake Compensation Plan (V4 submitted at Deadline 2) to reduce the number of breeding seasons from 3 to at least 2 and provided the rationale for this in the **Case for Reduction in Kittiwake Breeding Seasons Prior to Operation** (document reference: 12.5) at deadline 2.

Noting the differences in position currently retained with respect to kittiwake impacts and the timing of associated compensation delivery, the Applicants respectfully request the ExA to ask Natural England the following questions at First Written Questions for response at Deadline 3 for this topic:

1. Request Natural England to comment on the Applicants' apportioned impact as presented in the **RIAA [AS-085]** and **Project-level Kittiwake Compensation Plan (Revision 4)** with a focus on provision of evidence for the case of using the upper 95% UCI vs the mean, and 100% vs 53% adult apportionment. There is considerable precaution inherent in applying the upper 95% UCI, and 100% adult apportionment values to the compensation quantum, can Natural England elaborate on their case for applying these figures?
2. Request Natural England to provide their position on the update to the number of breeding seasons required for ANS to be in place prior to first operation as outlined in the **Project-level Kittiwake Compensation Plan (Revision 4) (document ref: 6.2.1)** and **Case for Reduction in Kittiwake Breeding Seasons for ANS Installation (document ref: 12.5)**?
3. Request that Natural England provide a written case to substantiate their position in response to the points made in the Applicants' **Case for reduction in Kittiwake Breeding Seasons for ANS installation (Document ref:12.5)**?

### *Guillemot [and razorbills] at the FFC SPA*

For guillemot [and razorbill] at the FFC SPA the principal compensation proposed by the Applicants in the **Guillemot [and Razorbill] Compensation Plan (Revision 3)** [AS-089] is predator reduction. While there was no strategic plan for guillemot and razorbill, predator reduction is in line with Defra's library of compensation measures (DESNZ, 2025).

Currently, the Applicants are pursuing a multi-stranded approach whereby project led solutions and strategic delivery are being investigated in parallel as outlined in **The Applicants' Written Summaries of Oral Submissions made at CAH1, ISH1 and ISH2** [REP1-049]. Survey work is currently taking place at two 'project-led' locations to determine suitability for a predator reduction scheme.



Should, for any reason outside of the Applicants' control, one or both of these sites become unavailable, or not deliver the required amount of compensation required, then the Applicants intend to make use of the strategic scheme at the Isles of Scilly. The Applicants undertook extensive survey work at the Isles of Scilly in 2024 (the results of which were provided to Natural England and the ExA in October 2024) and know that this location could provide well in excess of the compensation required for the DBS projects. The Applicants have been in consultation with the Offshore Wind Industry Council (OWIC) and other developers, with the aim of establishing an interim method of funding the Wildlife Trust and Isles of Scilly Wildlife Trust to develop a predator eradication project to provide sufficient strategic compensation which can then be funded through the MRF when it becomes available. The Applicants are of the understanding that Natural England are in favour of a strategic compensation scheme for predator reduction at the Isles of Scilly.

The Applicants suggest that since the public interest is protected by the draft DCO wording whereby the Guillemot [and Razorbill] Compensation, Implementation and Monitoring Plans (CIMP) will require the Applicants to deliver the required compensation as agreed by the relevant steering group, prior to installation occurring, that this is not the focus of debate. The measure (predator reduction) is agreed in Defra's library of compensation measures (DESNZ, 2025) and there are locations that could provide the level of compensation the Projects need.

### **Quantum of compensation**

The quantum of compensation is based on two components, mortality and compensation requirement.

Natural England's advice on auk displacement and mortality results in mortality estimates which the Applicants do not consider to be supported by the best available evidence. The Applicants consider that in all compensation documents the range of inputs (i.e. a range of displacement and mortality rates) should be retained to ensure that the SoS can make an informed judgement in their decision-making.

There is disagreement on the methodology calculating the scale of compensation required. Natural England have highlighted their preference for the use of the 'Hornsea 3 stage 2 method' [REP1-065]. The Applicants consider the Hornsea Three method to be unsuitable for a number of reasons as outlined above. In addition, the method was developed for kittiwake, a species for which there is demographic information available which is not available for auks. Natural England note this lack of demographic information in [REP1-065]. As

stated in relation to kittiwake, the Applicants had intended to submit further information regarding methodologies for calculating compensation at Deadline 2, however, an update will now to be provided at Deadline 3, assuming receipt of Natural England's representations. If there is no agreement on methodology, the Applicants consider that parallel numbers can continue to be provided and the SoS can make a judgment on quantum.

Noting the Applicants' identification of the primary disagreements related to Guillemot and Razorbill, the Applicants respectfully ask the ExA to ask Natural England the following questions at First Written Questions for response at Deadline 3:

1. Request Natural England to provide comment on the Applicants' statement in the **RIAA** paragraph 236 [AS-085] that based on Natural England's guidance to estimate seasonal abundance and apportioning for Guillemot:

*"...over 73% of the FFC SPA guillemot population is apparently present on all UK wind farms through the course of the year and at risk of displacement, despite the fact that offshore wind farms actually make up approximately 6% of the area within 300km of the FFC SPA.... It is not difficult to envisage that, with the addition of a small number of wind farms the current assessment methods could predict more birds are at risk of displacement than are present in the population."*

2. Request Natural England to provide comment on the Applicants' following comment in the **RIAA** paragraph 314 [AS-085] that based on Natural England's guidance to estimate seasonal abundance and apportioning for Razorbill:

*"...suggests that 40% of the FFC SPA razorbill population is apparently present on UK wind farms through the course of the year and at risk of displacement. This highlights the precautionary basis of the methods used to estimate seasonal abundance and apportioning since offshore wind farms make up approximately 6% of the area within 300km of the FFC SPA... Indeed, it is not difficult to envisage that, with the addition of a small number of wind farms the current assessment methods could predict more birds are at risk of displacement than are present in the population."*

3. Request Natural England to comment on whether applying rates greater than 50% displacement and 1% mortality to the auks at risk is justified

given the level of precaution from the estimation of seasonal abundance and apportioning?

4. Request Natural England to identify whether they have access to the Hornsea 3 Stage 2 methodology spreadsheet and could share it with the Applicants so it can be easily replicated and remove the chance of error, considering it is not publicly accessible and therefore is liable to errors?

— 5. Could Natural England provide their thoughts on the suitability of predator eradication/reduction on the Isles of Scilly as a strategic compensation scheme?

## Appendix B – Responses to Compulsory Acquisition Hearing Action Points

Action No.	Action	Applicants' Response
15	Provide an explanation as to why only Lake Farm, Rose Cottage and St Peters House in Bentley are identified as Category 3 parties when these properties form part of a longer row of properties which are also identified in Requirement 21 of the draft Development Consent Order [AS-120], namely Church Cottage, 1-4 Manor Farm Cottages and Keeper's Cottage. If these properties should be identified as Category 3 set out any implications that this may have for the Examination.	<p>The properties in Bentley referred to by the ExA were identified as Category 3 interests on a precautionary basis as having the potential to make a claim based on construction nuisance in accordance with s152 of PA08. However this was not in relation to operational noise and as such there is no link with <b>Draft DCO (Revision 5)</b> [REP1-004] Requirement 21.</p> <p>Church Cottage and 1-4 Manor Farm Cottages in Bentley are owned by Albanwise Limited which is a Category 1 and 2 interest listed in the <b>Book of Reference</b> [AS-148] (BoR). The Applicants are in the process of negotiating a voluntary agreement with Albanwise Limited and any compensation payable would take into account their interest in the land and property which would include any impact that may result in a Category 3 claim. This means that it is not appropriate to list these properties as Category 3 interests, following normal BoR practice.</p> <p>Lake Farm, Rose Cottage and St Peters House in Bentley are separately identified as Category 3 parties as they are privately owned in their own right, not by Albanwise Limited. Unlike the Albanwise interests, they are only in the BoR as Category 3 parties.</p> <p>Whilst completing further enquiries following the ExA's question, the Applicants accept that Keepers Cottage has been omitted from the Category 3 list, and we have therefore updated <b>3.2 Book of Reference</b> accordingly. The owners will be notified of this by the Applicants via notice of invitation to register as an interested party under Section 102A of the Planning Act 2008. The Applicants would highlight that they were consulted as part of the main Statutory Consultation as a Section 47 Consultee (being a member of the local community) on the 5th June 2023.</p>

<p>16</p>	<p>Requirement 21 also identifies:</p> <ul style="list-style-type: none"> <li>• 156 Victoria Road;</li> <li>• Maurice Wood, Jocks Lodge, Victoria Road;</li> <li>• Bentley Lodge, Victoria Road;</li> <li>• Spring Mount, Victoria Road; and</li> <li>• Rose Villa, Victoria Road</li> </ul> <p>as requiring noise limits to be put in place during operation. Only Bentley Lodge is listed in the Book of Reference as having a Category 3 interest. Provide an explanation as to why these properties are not listed and set out any implications for the Examination if they need to be included in the Book of Reference as a Category 3 interest.</p>	<p>The Applicants wish to clarify that there is no direct correlation between the Requirement 21 list in the <b>Draft DCO (Revision 5)</b> [REP1-004] and the Category 3 list, as they are used for different purposes. Category 3 Parties are defined by s57(4)-(6) of the Planning Act 2008 as those the Applicant thinks would or might be entitled to make a “relevant claim” for compensation. The purpose of Requirement 21 of the Draft DCO is to monitor and control noise during the operational phase.</p> <p>A number of properties are listed in Requirement 21 to provide a control mechanism for Operational Noise, following environmental impact assessment. These properties were identified in <b>Environment Statement Chapter 25 – Noise</b> [REP1-019] as potentially sensitive receptors which could experience operational noise (not at significant levels). A noise management plan is proposed (secured by Requirement 21), with a monitoring scheme to ensure its effectiveness at the named properties.</p> <p>None of the properties listed as Category 3 interests are included due to potential operational noise issues (i.e. they are not Category 3 interests by reference to potential noise-related claims under Part 1 Land Compensation Act 1973; there are in fact no Category 3 interests by reference to potential Part 1 claims of any type). Accordingly, there is no linkage between Requirement 21 and those properties listed as Category 3.</p> <p>The Applicants have reviewed all properties listed in Requirement 21 and concluded that, on the basis of the Operational Noise Assessment carried out (see <b>ES Chapter 25 – Noise</b> [REP1-019]), they do not need to be identified as Category 3 parties on the basis of potential operational noise claims under Land Compensation Act 1973 (Part 1).</p> <p>The Applicants have taken a precautionary approach to identifying the remaining Category 3 properties regarding potential claims sought S152(3) of the Planning Act 2008.</p>
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