



Secretary of State for Energy Security and Net Zero
Energy Infrastructure Planning Delivery Team
3-8 Whitehall Place
London
SW1A 2HH

Our ref: JF\33135\0005\32816944v1\TCS
Your ref: 238548
Date: 14 November 2023

By post and email: John.McKenna@energysecurity.gov.uk

Dear Sirs

Our Client: Knauf (UK) GmbH
Plot numbers: 36 and 46
Objection to the Southern Gas Networks Plc (Kingsferry gas pipeline replacement project) Compulsory Purchaser Order 2023

We are instructed by our Client to formally object to the Southern Gas Networks Plc (Kingsferry Gas Pipeline Replacement Project) Compulsory Purchase Order 2023 (**CPO**).

Our Client jointly owns (with Outback UK Propco I A Ltd) the privately maintained Ridham Dock Road, part of which has been included within the red line boundary of the Order Map and the CPO for the purposes of the acquisition by Southern Gas Networks Plc (**SGN**) of Access Rights, Pipeline Rights, Pipeline Construction Rights and Drilling Rights. This land comprises Plots 36 and 46 as shown on the Order Map.

Our Client objects to the CPO on the basis that it has serious concerns regarding the impact that the acquisition of rights will have upon its ability to use Ridham Dock Road to access its property at Ridham Dock. At present, Ridham Dock Road provides the sole means of access to Ridham Dock due to the junction improvement works which are currently taking place on the A249 and which prevent access via the only other suitable access road to the south.

Insufficient information has been provided by SGN as to the timing of the proposed works or its proposals for alternative access arrangements for our Client during that time. There has been no information provided as to the anticipated completion date of the junction improvement works being carried out by National Highways and our Client is concerned that without a robust mechanism to ensure that access to Ridham Dock Road is not restricted until alternative access is provide, it will suffer significant harm to its premises.

Our Client acknowledges the importance of SGN's proposed project and is open to discussing its concerns further with SGN to explore ways in which the necessary rights can be granted whilst protecting its interests.

We are happy to assist the Secretary of State should any further information be required at this stage in relation to our Client's objection.

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Yours faithfully

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