

THE SOUTHERN GAS NETWORKS PLC (KINGSFERRY GAS PIPELINE REPLACEMENT
PROJECT) COMPULSORY PURCHASE ORDER 2023

STATEMENT OF EVIDENCE

OF

SIMON THURLOW of SOUTHERN GAS NETWORKS PLC

1 QUALIFICATIONS AND EXPERIENCE

1.1 My name is Simon Thurlow. I am an Engineering Project Manager for SGN plc, in the Transmission (Southern) Department which operates in the counties of Surrey, Sussex, Hampshire, Dorset, Oxfordshire, Berkshire, Buckinghamshire, London, Kent and Isle of Wight. The Team I lead is responsible for the safe delivery of complex projects within the Departments works portfolio. I have 27 years' experience within the industry covering many aspects of delivery within the gas distribution sector. My specialist qualifications comprise a Gas Distribution (GD) Main laying Construction Skills Certification Scheme (CSCS) registered up to 630mm, Horizontal Drilling (HDD), IOSH (Institute of Occupational Safety & Health), NEC (New Engineering Contracts) 4 Contract Management, SCO (Safe Control of Operation) 1, 2, 4, 5 NRSWA (New Roads Street Works Act) Street works management, P1-P9 (SGN Welding policies) Management, and Cross Country Pipeline (CCP) Qualification.

2 INTRODUCTION AND SCOPE OF EVIDENCE

2.1 I have been involved with the Kingsferry Gas Diversion Project (**Project**) since 2019, working within the SGN and wider consultancy team to find the viable Project solution now being promoted by SGN.

2.2 Looking ahead, my role as Engineering Project Manager for the Project will comprise the following:

- (a) taking the Project through the tender process with our procurement team. Within that process I will be the company lead for reviewing all the technical submissions to be submitted by tenderers;
- (b) ensuring that upon the award of a NEC 4 contract to a winning tenderer that the key milestone dates set out in the winning tender are met, and that the winning contractor delivers the Project safely and otherwise in accordance with SGN policy and procedure;
- (c) as the SGN representative responsible for ensuring all aspects of delivery of the Project, appropriately communicating with relevant stakeholders in line with key milestone dates set out the works programme;
- (d) as the 'Authorising Engineer' for the Project, responsibility for reviewing all RAMs (Risk Assessments & Method Statements) for compliance with SGN policy and procedure, along with compliance with any environmental mitigation measures required to deliver the Project; and
- (e) ensuring that when the Project is fully delivered, the areas affected by our works are returned to an acceptable condition.

2.3 My statement of evidence covers matters relating to the design, engineering and delivery of the Project and describes the processes and decisions relating to each issue and how have they informed its evolution. It explains how the Project will be constructed and operated and the identification of construction sites.

2.4 In broad terms my statement will explain why the rights being sought in the Order (**CD 1**) are required to deliver the Project, as well as responding to concerns raised by objectors to the access arrangements during the Project works.

2.5 In this Statement, I provide:

Section 3 – An overview of the Project, describing its constituent elements;

Section 4 – An overview of the of the proposed works and the land and interests required to deliver the Project; and

Section 5 – A considered response to the objections that have been received to the Order (**CD 1**), insofar as they relate to engineering matters and the requirement to acquire rights over the land owned by the objectors in order to deliver the Project.

3 OVERVIEW OF THE PROJECT

3.1 The Project comprises the construction and operation of a new gas pipeline under the river Swale between mainland Kent and the Isle of Sheppey (**New Pipeline**) and the decommissioning of the existing intermediate gas pipeline (**Existing Pipeline**) suspended beneath the superstructure of the Kingsferry Bridge over the river Swale, and associated works.

3.2 The Existing Pipeline crosses the river Swale via a service tunnel within the Kingsferry Bridge (as illustrated in Figures 1 and 2 below).



Figure 1: Kingsferry Bridge



Figure 2: The Existing Pipeline within the service tunnel of Kingsferry Bridge.

- 3.3 The Existing Pipeline is reaching the end of its asset life and requires replacement. Figure 3 shows the route of the Existing Pipeline along with the location of 15 gas escapes along its length (as indicated by the yellow diamonds), several of these along the Kingsferry Bridge.



Figure 3: Gas escapes along the Existing Pipeline.

- 3.4 The Existing Pipeline and steel support gantry located within the service tunnel under Kingsferry Bridge is corroding, caused in part due to harsh environmental conditions within the tunnel. Continued corrosion on the pipeline will cause the pipe to fail and further leaks to occur. (as shown in **Figures 4-6** below).





Figures 4 – 6: Condition of the Existing Pipeline

- 3.5 It is proposed to replace an approximately 518m long (plus vertical sections), 300mm diameter section of the Existing Pipeline with the New Pipeline (to be located under the river Swale) which will be installed via Open Cut methodology on both the mainland and on the island.
- 3.6 Horizontal Directional Drilling (**HDD**) will be used to get the pipeline under the River Swale. As shown on the drawing appended to my Statement of Evidence at **Appendix 2**, the New Pipeline would connect back into the Existing Pipeline either side of the Kingsferry Bridge. These connection points as shown in **Appendix 3** will be carried out as a live operation, ensuring that the gas flow to the Island is not interrupted.
- 3.7 The New Pipeline section will be 110km long and be constructed using 400mm SDR9 HDPE (High Density Polyethene) and 400mm SDR (Standard Dimension Ratio) 11 HDPE. Once the New Pipeline is installed and commissioned, SGN will then decommission and remove the existing 300mm Steel pipeline from the Kingsferry Bridge. At no point will supply to the Island be interrupted.
- 3.8 Together these are the **Works** which comprise the Project.
- 3.9 Following decommissioning SGN will remove the Existing Pipeline rather than leaving it in situ for two reasons:
- (a) section 6.8 of the overarching Licence for Gas Pipelines and Agreement for Standard Conditions dated 7 March 2024 (**Network Rail Licence**) between Network Rail Infrastructure Limited (**Network Rail**) and SGN obligates SGN to remove the above ground pipeline within 12 months of cessation of its use; and
 - (b) SGN's preference would in any event be to remove the decommissioned pipeline which would otherwise need to be maintained in situ in perpetuity (as a consequence of the continuing corrosion of the Existing Pipeline material and support), thereby creating a

burdensome ongoing requirement for regular asset surveys and (as required) remedial works to ensure the safety of the bridge structure.

- 3.10 SGN's Network Investment Committee granted internal approval to progress with the Project and allocated appropriate funding and financial management in May 2023 via SGN's governance process.
- 3.11 To secure contractor resources for the Project, SGN will undertake a competitive procurement event from a preferred list of suppliers. The successful contractor will then undertake the works.
- 3.12 Delivery of the Project is programmed for completion by 31 March 2026 to meet the commitments made to OFGEM (Office for Gas and Electricity Markets) under the RIIO-GD2 funding, which is the current price control the gas distribution network. Aside from securing the necessary land rights to deliver the Project, SGN also must have regard to the requirements referenced in the draft Habitats Assessment agreed with Natural England to avoid impacts on the breeding season for birds. Consequently, SGN anticipates a start date for the on-site pre-construction activities in October 2024 with compound works construction commencing in February 2025. Completion of these works will enable the installation of the new pipeline and connections to the Existing Pipeline from August 2025 with completion in October 2025.
- 3.13 The decommissioning of the Existing Pipeline within the structure and service tunnel of Kingsferry Bridge will commence after installation and commissioning of the New Pipeline has taken place in November 2025, with decommissioning anticipated to be completed in March 2026.

4 LAND/RIGHTS REQUIRED FOR THE DELIVERY OF THE PROJECT

- 4.1 The component parts of the Project are described below:

Construction of New Pipeline

- 4.2 Construction of the New Pipeline will be undertaken using a combination of trenched installation techniques across open land, and trenchless methods such as Horizontal Directional Drilling (**HDD**), to cross obstacles with minimal disturbance where appropriate, including (but not limited to) roads, buried utilities and the River Swale.
- 4.3 I describe the component parts of constructing the New Pipeline below, which are (where appropriate at this stage) illustrated on the drawing at **Appendix 3** of my Statement of Evidence:

- (a) A working corridor comprising:

- (i) Pipe trench: this is the excavation within which the 400mm New Pipeline will be installed. This is highlighted as the red line within the blue hatch area in **Appendix 3**.
- (ii) Working areas: these are areas on either side of the pipe trench which are needed to allow the safe and efficient movement of personnel, plant and machinery used to perform the required construction activities. These areas will include space to weld, inspect and coat the pipeline before it is lowered into the trench. Highlighted by blue hatch area and yellow area for compounds in **Appendix 3**.

- (iii) Topsoil bund: these areas will be used for the storage of topsoil excavated from the pipe trench. Will be located along the open excavation indicated by the blue hatch area in **Appendix3**.
 - (iv) Subsoil bunds: these areas will be used to store the soil that has been excavated to create the trench. The subsoil removed from the trench will be stockpiled adjacent to the areas from where it was removed to ensure the soil is returned to the same areas during reinstatement. The subsoil will be stored as far as practicable away from the topsoil to prevent mixing of soil types. The bunds will be located along the open excavation indicated by the blue hatch area in **Appendix3**.
 - (v) Running track: the working corridor will include a running track for construction traffic along the pipeline route. The running track will be approximately 8m wide increasing up to 12m where there are passing places. This is particularly important to ensure access in the event of an emergency. The running track will be located along the open excavation indicated by the blue hatch area in **Appendix 3**.
 - (vi) Fence: to ensure compliance with the CDM (Construction Design & Management) Regulations 2015, the working area will be fenced off to define the area in which the construction activities will be undertaken. Fencing types will be selected based on the purpose required (e.g. to demarcate vehicle and pedestrian/working areas where required, to provide security in high-risk areas). This will be constructed within the blue hatch area and yellow compound areas shown in **Appendix 3**.
- (b) The construction works will be serviced from one construction compound on the mainland and one on the island side (Plots 1, 3-5, 40-41, 44, 65, 67-68 and 80). The main compound will be located on the south side of the river Swale adjacent to and accessed from Ferry Bridge Road. This compound will hold contractors' offices and welfare infrastructure, materials, plant and equipment stores. The compound will be secured by a perimeter hoarding and full time out of hours security resources. As shown in Figure 7 below, during the decommissioning works, the compound to the south of the river Swale will move nearer to the southern abutment of the Kingsferry Bridge.



Figure 7: Drawing showing decommissioning compound south of the River Swale

- (c) The compound on the north side of the river Swale will be primarily for material storage and local contractor welfare facilities. This compound will service the laydown area for the HDD pipeline string activities prior to pulling the pipeline into the HDD.
- (d) In advance of the main construction works and compound installation, various surveys and ecological mitigation activities will be undertaken. These activities will include up to date habitat surveys and records, relocation of great crested newts and reptiles (as may be necessary) along with protection infrastructure for watercourses, ponds and other relevant ecological areas of interest.
- (e) The Works will be overseen by ecological specialists and undertaken subject to the requirements of controlled risk assessments and methods of working. Archaeological specialist input would be requested should any archaeological assets be found during the course of constructing the Works, although this is not anticipated.
- (f) The design and construction of temporary laydown areas to be accessed off the local highway network will provide for protection to the existing landscape including temporary drainage controls via local pumping. Temporary drainage systems and controls will be detailed within the construction environmental management plan which will be produced prior to construction in October 2024 as part of the construction design and management process.
- (g) The section of the New Pipeline under the river Swale will be installed using HDD techniques with a reception pit installed on the north side of the river Swale and a launch pit on the south side. This is illustrated on the drawing appended to my statement of evidence at **Appendix 3**. This section of pipeline will be prefabricated as a pipe string that will be pulled back by winch towards the southern pit.
- (h) The connecting pipelines on either side of the river Swale will be installed via standard pipelaying open cut trench techniques to the connection points on the Existing Pipeline. Work on sections of Existing Pipeline within the public highway will be undertaken with standard highways notices (NRSWA) to standard installation and reinstatement specifications and established procedures to ensure the work is undertaken safely and the highway is properly reinstated following completion of the works.
- (i) The New Pipeline connections will be made using flanges at each connection point that are to be installed on the Existing Pipeline. The Existing Pipeline will be exposed within supported excavations, and the new pipe flanges installed under pressure by a specialist Contractor. These works will all be undertaken and controlled by SGN through its own internal permits to work and standard procedures.

Removal and decommissioning of the Existing Pipeline

- 4.4 The removal of the Existing Pipeline will be undertaken in discrete phases to allow for Network Rail interfaces, restricted access and methods of working. No detailed design drawing has been created for the decommissioning phase yet but the phases are set out in detail as follows:

Phase 1 - Removal of the Existing Pipeline from within the existing Kingsferry Bridge south abutment;

Phase 2 - Removal of the Existing Pipeline from under the existing Kingsferry Bridge superstructure on the river Swale south foreshore;

Phase 3 - Removal of the Existing Pipeline from within the Kingsferry Bridge southern tower;

Phase 4 - Removal of the Existing Pipeline from within the Kingsferry Bridge service tunnel section;

Phase 5 - Removal of the Existing Pipeline from within the Kingsferry Bridge northern tower;

Phase 6 - Removal of the Existing Pipeline from within the existing Kingsferry Bridge south abutment; and

Phase 7 - Removal of the Existing Pipeline from under the existing Kingsferry Bridge superstructure on the river Swale south foreshore

- 4.5 The removal works' final scope, methodology and interfaces will be subject to the Network Rail Asset Protection and Optimisation (**ASPRO**) Team process. The ASPRO process has a number of defined stages, but in overview it provides that following the initial notification which has been made to Network Rail by SGN, early engagement discussions will lead to an agreed, detailed, cost estimate being provided to SGN by Network Rail to cover Network Rail's approval of the design and implementation of the Project works affecting Network Rail property. Further detailed discussions are then expected to lead to the ASPRO Team at Network Rail being able to agree with SGN an approved works package and a design and delivery programme to be secured in an asset protection agreement.
- 4.6 The removal works will be serviced from two secure contractor compounds either side of the river Swale adjacent to the Kingsferry Bridge north and south abutments. Access to the compounds will be via Ferry Bridge Road and Sheppey Way.
- 4.7 Access to the work areas will be via the slipways to the north and south foreshores and adjacent to the tower entrances on the Kingsferry Bridge. A temporary lane closure on the northern lane of the bridge section of Sheppey Way will be required when access or egress to the abutment towers is required.
- 4.8 Various proprietary access scaffold systems will be installed within the specific phases of pipeline removal to suit the decommissioning and redundant pipeline removal requirements of the Works.

Compulsory acquisition of new rights

- 4.9 SGN's approach is to only acquire the interests that it requires over the various plots shown on the Order Plan (**CD 2**). Accordingly, SGN only seeks to create new rights over the relevant land rather than acquiring freehold.
- 4.10 The new rights sought by SGN have been separated into 'packages' based on their purpose and applied to specific plots, as necessary. Whilst all of the rights sought are permanent, some of the rights are only required to be exercised for a limited period, such as the creation of construction compounds during the construction, commissioning and decommissioning phases.
- 4.11 The rights 'packages' have been tailored in this way to ensure that a proportionate approach to compulsory purchase is taken with SGN only seeking to create new rights rather than acquiring the freehold interest in the plots. The Statement of Evidence of Mr David Backhouse provides detailed narrative addressing SGN's engagement with third parties.
- 4.12 The Order (**CD 1**) clearly identifies that its only new rights that are sought to be in respect of the numbered parcels of the Order Land. As Mr Backhouse explains in his evidence, where new rights are proposed to be acquired, the description identifies the name of the appropriate rights package.

5 CONSIDERATION OF OBJECTIONS

5.1 A total of eight objections were made to the Order (**CD 1**) as follows (adopting the objection numbering from section 17 of the Statement of Case):

- (a) **Objection 1:** Southern Water Services Limited (**Southern Water**) in respect of Plot Nos. 1-4, 6, 7, 9-14, 16, 17, 20-27, 32, 34, 36-44, 45, 47, 48, 53, 54, 57, 59, 62, 64-67, 69-80 and 83 (**CD 37**);
- (b) **Objection 2:** Network Rail Infrastructure Limited (**Network Rail**) in respect of Plots Nos. 31-35, 37-44, 48, 49, 54, 55, 62, 64, 69 and 70 (**CD 38**);
- (c) **Objection 3:** Outback UK Propco I A Limited (**Outback**) in respect of Plot Nos. 34-36 and 46 (**CD 39**);
- (d) **Objection 4:** Knauf (UK) GmbH (**Knauf**) in respect of Plot Nos. 34-36 and 38-47 (**CD 40**);
- (e) **Objection 5:** Countrystyle Recycling Ltd (**Countrystyle**) in respect of Plot Nos. 36 and 46 (**CD 41**);
- (f) **Objection 6:** Grovehurst Energy Limited (subsidiary of D.S. Smith Group) (**Grovehurst**) in respect of Plot Nos. 36 and 46 (**CD 42**);
- (g) **Objection 7:** Manweb Nomineeco Limited (**Manweb**) in respect of Plot Nos. 36 and 46 (**CD 43**); and
- (h) **Objection 8:** Ridham Sea Terminals Limited (**RST**) in respect of Plot Nos. 36 and 46 (**CD 44**).

5.2 I consider these objections further below – firstly in terms of each objectors' land-holding in the context of the Order Land and the rights that SGN are seeking and secondly in terms of certain grounds of objection that have been raised.

Consideration of the objectors' land-holdings and the Project

5.3 Land rights are only required from three of the objectors (Network Rail, Outback and Knauf being Objections 2 – 4) (**CD 38, CD 39 and CD 40**) as these objectors are land-owners. **Appendix 4** shows the extent of these land-holdings within the Order Land.

5.4 The remaining objectors (Southern Water, Countrystyle, Grovehurst, Manweb and RST being Objections 1 and 5 – 8) (**CD 37, CD 41, CD 42, CD 43 and CD 44**) hold other rights over the Order Land. **Appendix 4** shows the extent of these land-holdings within the Order Land.

Statutory undertaker apparatus (Southern Water and Network Rail) located within proximity to the Project works

5.5 Objections 1 and 2 (**CD 37 and CD 38**) relate to the location of statutory undertaker apparatus located within proximity to the Project Works and the protection of that apparatus.

Southern Water

5.6 Discussions were had with Southern Water when they carried out their recent water main replacement project. Southern Water agreed to install a ducting on Ridham Dock Road to facilitate the installation of the proposed SGN asset at a later date, but this was not put in as

agreed. However, SGN has been in discussions with Southern Water's engineers and has obtained the as laid plans of the Southern Water project and SGN has determined that it can deliver the Project without affecting Southern Water's assets. Nevertheless, it has proceeded to engage with Southern Water to secure an asset protection agreement to secure the necessary protections required by the water undertaker. Southern Water's assets are shown in **Appendix 5** in relation to the redline boundary of the Order.

5.7 On 6 December 2023, SGN's solicitors Addleshaw Goddard LLP approached Southern Water in order to commence the negotiations of the asset protection agreement to which I have referred and which shall secure the necessary protections of Southern Water's apparatus and manage the interactions between Southern Water's apparatus and the Project works in anticipation of Southern Water removing its objection to the Order (**CD 1**). A draft agreement was circulated by Southern Water's solicitors on 26 March 2024 and as at the date of this Statement the parties are actively and positively negotiating the terms of this agreement.

Network Rail

5.8 The removal of SGN's existing pipeline from the Network Rail-owned Kingsferry Bridge will be carried out under the terms of the Basic Asset Protection Agreement (BAPA).

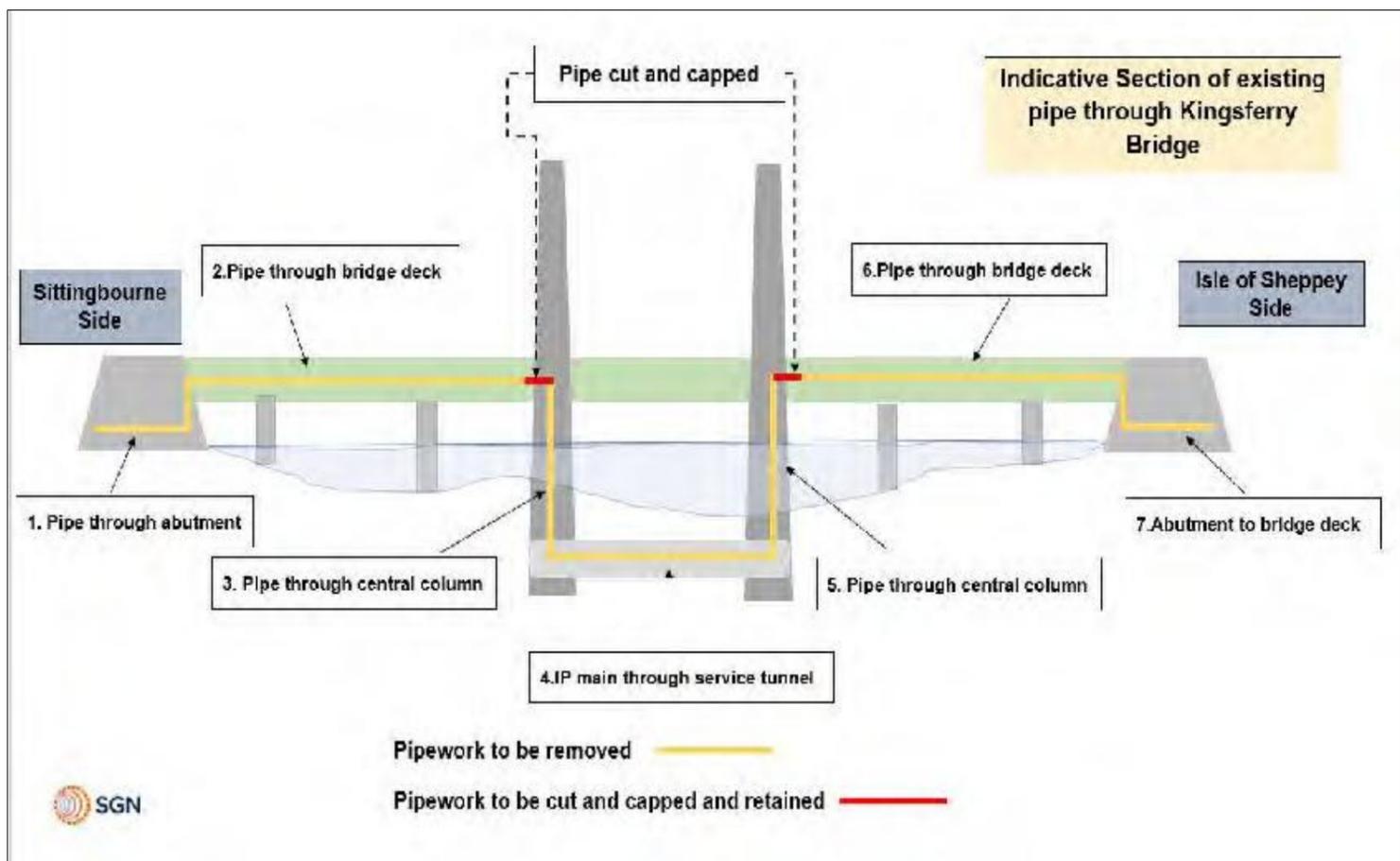


Figure 8: Diagram showing location of SGN Existing Pipeline within Network Rail owned Kingsferry Bridge

5.9 SGN has a licence agreement in place with Network Rail (NR) which regulates the framework for the decommissioning of SGN's pipelines and which applies to the decommissioning of the Existing Pipeline. The NR Licence obligations are triggered upon SGN giving Network Rail not less than 12 months' prior written notice expiring on the anniversary of 1 January 2009. Assuming assumptions around programme for the installation of the New Pipeline are met, SGN currently anticipates serving notice to expire on 1 January 2027. Prior to expiry of that notice SGN must:

- (a) remove the relevant part of the Existing Pipeline;

- (b) execute any works for the protection of the railway as Network Rail require; and
- (c) comply with Network Rail's engineering conditions (being such conditions as Network Rail may properly require for the safety, protection or operation of its railway) and/or pipeline conditions, which require (amongst other things):
 - (i) Network Rail's prior written approval to the commencement of the works;
 - (ii) SGN pre-planning entry onto Network Rail's land as far in advance as possible before hand;
 - (iii) any works to be carried out to Network Rail's satisfaction and (if required) under its supervision; and
 - (iv) compliance with any such stipulations, directions and requirements as Network Rail shall prescribe.

5.10 As at the date of this Statement, SGN and Network Rail have agreed a private agreement to secure the removal of Network Rail's objection to the Order. The agreement has been executed by SGN and has been circulated to Network Rail's solicitors for execution.

Maintenance of access to interest holders to their interests for the duration of the works affecting Ridham Dock Road

5.11 Objections 3 – 8 (**CD 39, CD 40, CD 41, CD 42, CD 43 and CD 44**) essentially make the same points to different degrees, in relation to the maintenance of access to their interests for the duration of the Works affecting Ridham Dock Road.

5.12 Ridham Dock Road is a private road jointly owned by Outback and Knauf. It is located on the mainland and extends off Old Ferry Road to the west of the A249/Sheppey Way, under the Kingsferry Bridge and along the route of the foreshore to the north-western border of the industrial estate known as Ridham Dock (**Northern Route**) (shown in Figure 8 below). Ridham Dock is also accessible from the south via Swale Way (**Southern Route**) (shown in Figure 9 below).



Figure 8: Northern Route

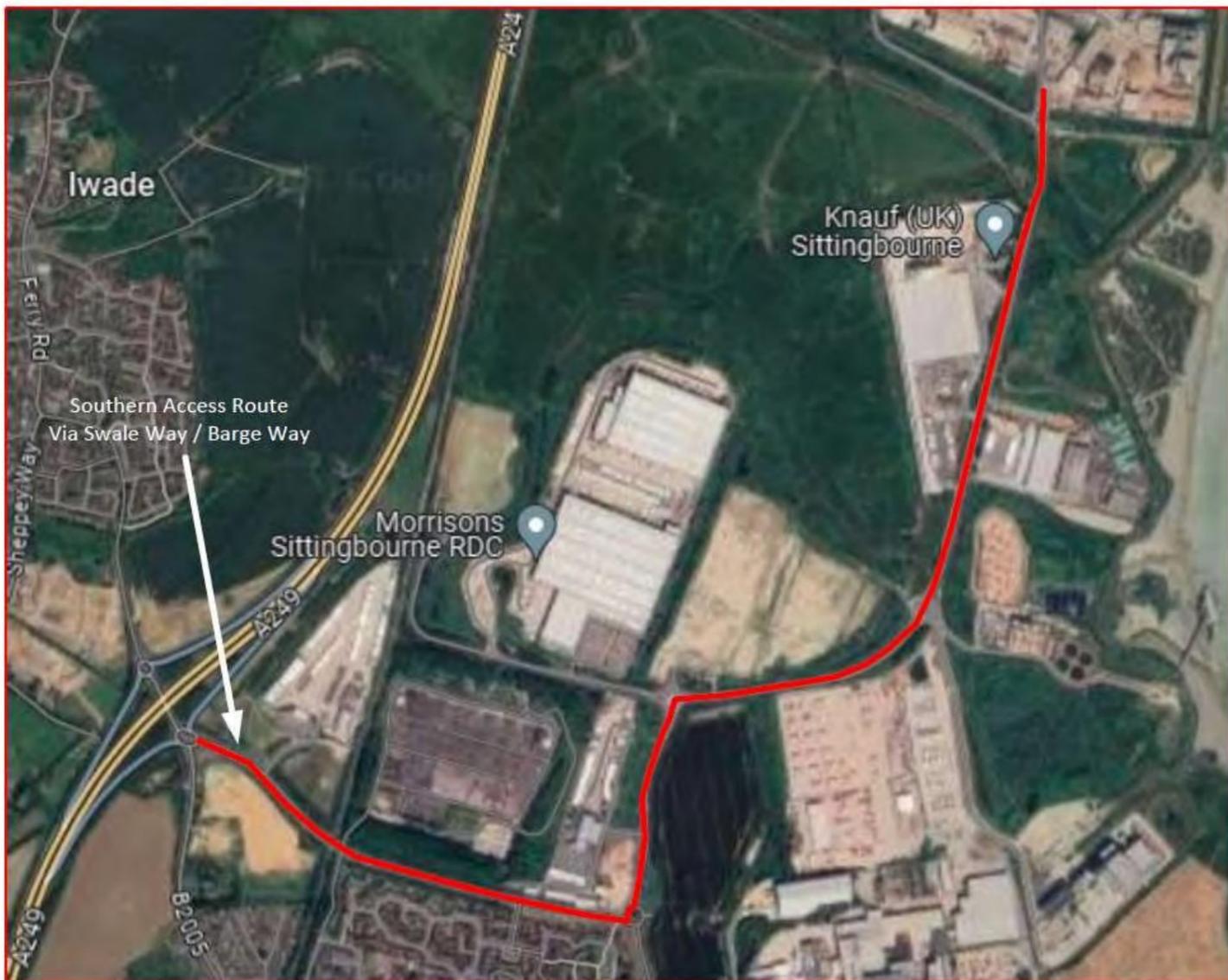


Figure 9: Southern Route

- 5.13 Outback and Knauf also own Ridham Dock which is fully tenanted to eight tenants; the remaining objectors are tenants and occupiers that utilise Ridham Dock Road to access the properties at Ridham Dock.

Impeded access due to SGN Works

- 5.14 Part of Ridham Dock Road has been included in the Order Land to facilitate drilling operations for the New Pipeline as it is located between the connection point to the Existing Pipeline and the proposed drilling location as shown hatched red in **Appendix 6**. The objectors have raised concerns that their access will be impeded as a result of these works.

- 5.15 Access via Ridham Dock Road will be restricted for an 8-week period during drilling operations (subject to securing a traffic regulation order). During this period, alternative and unimpeded access to Ridham Dock will be maintained via the southern route along Swale Way. Outside this period, traffic management controls will be in place on Ridham Dock Road to regulate vehicle movements. The traffic management controls will be in place for 8 weeks and will be subject to a Traffic Regulation Order from the highway authority. SGN's Project, and proposed traffic measures, will therefore not at any time lead to access to any third-party land being prevented.

Southern Water works

- 5.16 Works have been undertaken on parts of the Order Land (both on the Isle of Sheppey and the mainland) by Southern Water to construct its Sheppey Pipeline Project between November 2022 and August 2023. The Southern Water works comprised HDD works with compounds on

both the island and mainland sides, within a similar area to the Project. SGN has ensured that the Project will not have direct interface with Southern Water's assets and ensures that the necessary distances have been fully considered in the Project design.

- 5.17 SGN has reviewed the way in which the Southern Water works were delivered and SGN have planned its works to reduce the impact on the interest holders and ensure they are not affected to the same extent. SGN would only close Ridham Dock Road for an 8-week period whereas Southern Water had it closed for 7 months.

Impeded access due to SGN Works running concurrently with local highway improvement works

- 5.18 Kent County Council (**KCC**) are undertaking (see **Figure 10** below) a £38.1 million highway improvement project at A249/Grovehurst Road. These improvement works are being constructed by KCC's contractor, Jackson Civil Engineering and comprise:

- (a) replacing the existing 'dumbbell' junction with a two-bridge flyover; and
- (b) removing the current roundabouts and constructing an additional bridge to create a loop over the A249

(together the Kent County Council (**KCC**) Works).



Figure 10: Map showing KCC works at Grovehurst Road in relation to Ridham Dock Road

- 5.19 The objectors have raised concerns that access to Ridham Dock could be impeded because of the combined impact of the KCC Works and the SGN Works.
- 5.20 SGN has been provided by Chris Williams, the site agent who is project managing the highway works on behalf of Jackson Civil Engineering for KCC, the planned phasing of the KCC Works. **Appendix 1** to my Statement of Evidence comprises a table which briefly summarises each phase of the works together with associated drawings. This table also provides the associated timeline for the delivery of each phase and an explanation as to how each phase of the KCC Works will affect access to Swale Way from the A249.

- 5.21 The phasing referred to at **Appendix 1** (which has been agreed by Jackson Civil Engineering) establishes that access to Swale Way from the A249 will only be affected by 3 phases of the KCC Works:
- (a) Phase 2B (Southbound Off Slip +Gyratory South) scheduled to be undertaken in the period August – December 2024;
 - (b) Phase 1B (Gyratory Southern Spur) scheduled to be undertaken in the period November 2024 – January 2025; and
 - (c) Phase 3B (Segmental Road Closure) scheduled to be undertaken in April 2025.
- 5.22 Throughout Phases 2B and 1B, temporary asphalt will be laid to provide a carriageway around the works controlled by two-way traffic lights which will enable traffic to pass in each direction throughout the works outlined in these two phases. Phase 3B will involve a full road closure for the one-month period, but a signed diversion will be in place which will provide continued access to the Ridham Dock Industrial Estate and other business and industrial locations as shown in **Appendix 7**.
- 5.23 The KCC Works are currently underway and are aligned with the dates provided by KCC which are set out in the table appended to my Statement of Evidence at **Appendix 1**.
- 5.24 The Project Works for the replacement of the Existing Pipeline requires Ridham Dock Road to be closed in early September 2025 for eight weeks. The timeline at **Appendix 1** to my Statement which outlines the timetable for KCC's Works, makes clear that these are due to be completed some four months earlier than the Project Works, by May 2025.
- 5.25 Based on the information provided by Jackson Civil Engineering, SGN can confirm that access along Ridham Dock Road will not be restricted by SGN to facilitate the Project Works concurrently with the KCC Works. Continued access to the various business park and industrial complexes which ordinarily have the benefit of highway access via Ridham Dock Road will be always available along Swale Way from the A249, which will not be impacted by the KCC Works during the period of closure of Ridham Dock Road.
- 5.26 In addition SGN note that whilst Outback and Knauf own the privately maintained part of Ridham Dock Road over which SGN seeks to acquire rights, SGN will be required to obtain a traffic regulation order (SGN practice is to apply some 6 months prior to the date when such an order is required) to secure the necessary access restrictions along the publicly maintainable section of Ridham Dock Road to facilitate its Project. It is highly unlikely that the local authority would be willing to make a temporary traffic regulation order which facilitated access restrictions on Ridham Dock Road at a time when access is unavailable to affected properties and businesses from the A249.
- 5.27 Notwithstanding the protection afforded by the requirement to secure a traffic regulation order, SGN would be prepared to undertake not to implement any access restrictions on Ridham Dock Road unless and until the KCC Works to improve the B2005 (Grovehurst Road) and A249 junction no longer pose an impediment to access for vehicles along Swale Way.



Figure 11: Map showing public and privately maintained sections of Ridham Dock Road (CD 33)

- 5.28 SGN is seeking to progress negotiations with Outback to provide assurances that the company requires as to the timing of Project Works and their co-ordination with the KCC Works.
- 5.29 Throughout the Project Works, I will continue to liaise closely with the affected stakeholders on a regular basis to ensure they are all aware of progress and delivery against SGN's programme.

6 SUMMARY AND CONCLUSIONS

- 6.1 I have explained in my Statement, the need for the Project is to safeguard the continued and uninterrupted supply of gas to the Isle of Sheppey and replace the Existing Pipeline that has come to the end of its operational lifespan. I have described the Works packages required to deliver the Project which comprise delivery of the New Pipeline and the decommissioning of the Existing Pipeline, together with associated works.
- 6.2 I have explained that the land which is the subject of the compulsory purchase powers in the Order (CD 1) comprises only the land necessary to deliver the construction, operation, repair, maintenance and decommissioning of the Project. I have also explained that SGN's approach is only to acquire the interests that it requires over the Order Land, rather than acquiring the freehold.
- 6.3 I have explained that negotiations are underway to protect the interests of statutory undertakers. I have also described how SGN has ensured that access to Ridham Dock is maintained throughout the Project Works either via Ridham Dock Road or via Swale Way and access will not be prevented as a result of the combined effects of the KCC Works and the Project Works. For completeness, I have set out how SGN has considered each of the objections received to the making of the Order and provide the relevant technical responses.

7 DECLARATION

- 7.1 I confirm that the opinions expressed in this statement of evidence are my true and professional opinions.

Signed:



Dated: 9 April 2024

APPENDICES:

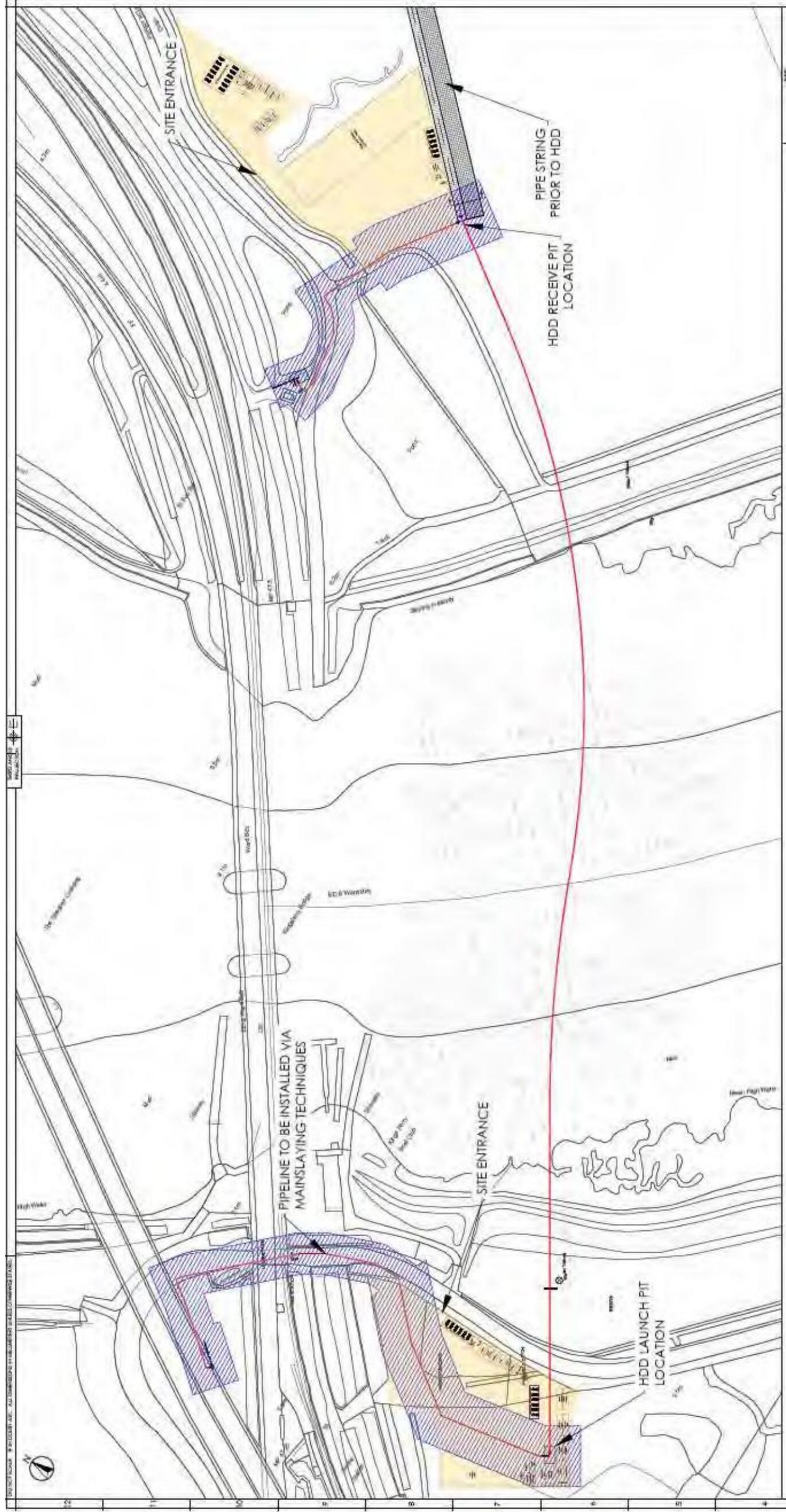
- Appendix 1: Works to B2005/Grovehurst Road and A249 junction being undertaken by KCC
- Appendix 2: Proposed New Pipeline Design Drawing
- Appendix 3: Proposed New Pipeline Design Drawing – Working Compounds (yellow)
- Appendix 4: Land Holdings
- Appendix 5: Southern Water's Apparatus
- Appendix 6: Part of Ridham Dock Road affected by Order works
- Appendix 7: Diversion route

Appendix 1

Works to B2005/Grovehurst Road and A249 junction being undertaken by KCC

Phase	Description of work	Timeline	Affects Swale Way Access
1a North Gyratory	<ul style="list-style-type: none"> • Earthworks • Road constriction • Diversion of Stats 	09/23 – 11/24	No
1B South Gyratory	<ul style="list-style-type: none"> • Offline earthworks • Drainage Runs • Diversion of Gas governor 	09/23 – 04/24	No
New Bridge Construction	<ul style="list-style-type: none"> • Piling • RC works 	09/23 – 12/24	No
Developer Roundabout	<ul style="list-style-type: none"> • New road construction • Stats diversion 	01/24 – 07/24	No
1B Quadrant	<ul style="list-style-type: none"> • Offline Road Construction • Diversion of stats into new footway • Complete Road Construction 	08/23 – 06/24	No
1B New Nicholls	<ul style="list-style-type: none"> • Offline Road Construction 	02/24 – 04/24	No
1a Northbound on Slip + Gyratory	<ul style="list-style-type: none"> • Re-alignment of slip road 	09/23 – 11/24	No
2G Northbound Off Slip Widening	<ul style="list-style-type: none"> • Drainage • Road works 	09/23 – 06/24	No
1B Nicholls/North Pond	<ul style="list-style-type: none"> • Construction of new pond 	09/23 – 06/24	No
2B Southbound Off Slip +Gyratory South	<ul style="list-style-type: none"> • New road Construction • Major Earthworks 	08/24 – 12/24	Yes – Two way traffic flow around works on temporary asphalt
1B Gyratory Southern Spur	<ul style="list-style-type: none"> • Cable Diversion • New Drainage 	11/24 – 01/25	Yes – Two way traffic flow around works on temporary asphalt
2G New Drainage Outfall from A249	<ul style="list-style-type: none"> • Drainage 	09/23 – 02/24	No
2F Southbound on Slip Widening	<ul style="list-style-type: none"> • Drainage • Road works 	08/24 – 11/24	No
2H Existing Roundabout Infilling	<ul style="list-style-type: none"> • Road works 	06/24 & 04/25	No
Phase 3A New Gyratory Layout, Daytime Lane Closures	<ul style="list-style-type: none"> • Final infilling • Landscaping 	04/25 – 05/25	No
Phase 3B Segmental Road Closure	<ul style="list-style-type: none"> • Ties ins • Overlay 	04/25	Yes – Road Closures, Swale Way still accessible at all times

Appendix 3
Proposed New Pipeline Design Drawing – Working Compounds (yellow)



Appendix 4
Land Holdings



Key: Area of Ownership

TITLE BOUNDARIES BASED ON THE NATIONAL POLYGON DATASET

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Notes:

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936

Interest: **Knauf UK GMBH**

Location: **Land at Sheppey Way (B2231) and Kingsferry Bridge, ME9 8SS**

Coords: **59 1510, 168966**

Scheme Name: **Southern Gas Networks PLC (Kingsferry Gas Pipeline Replacement Project) Compulsory Purchase Order 2023**

Drawing Name: **Land Ownership Plan**

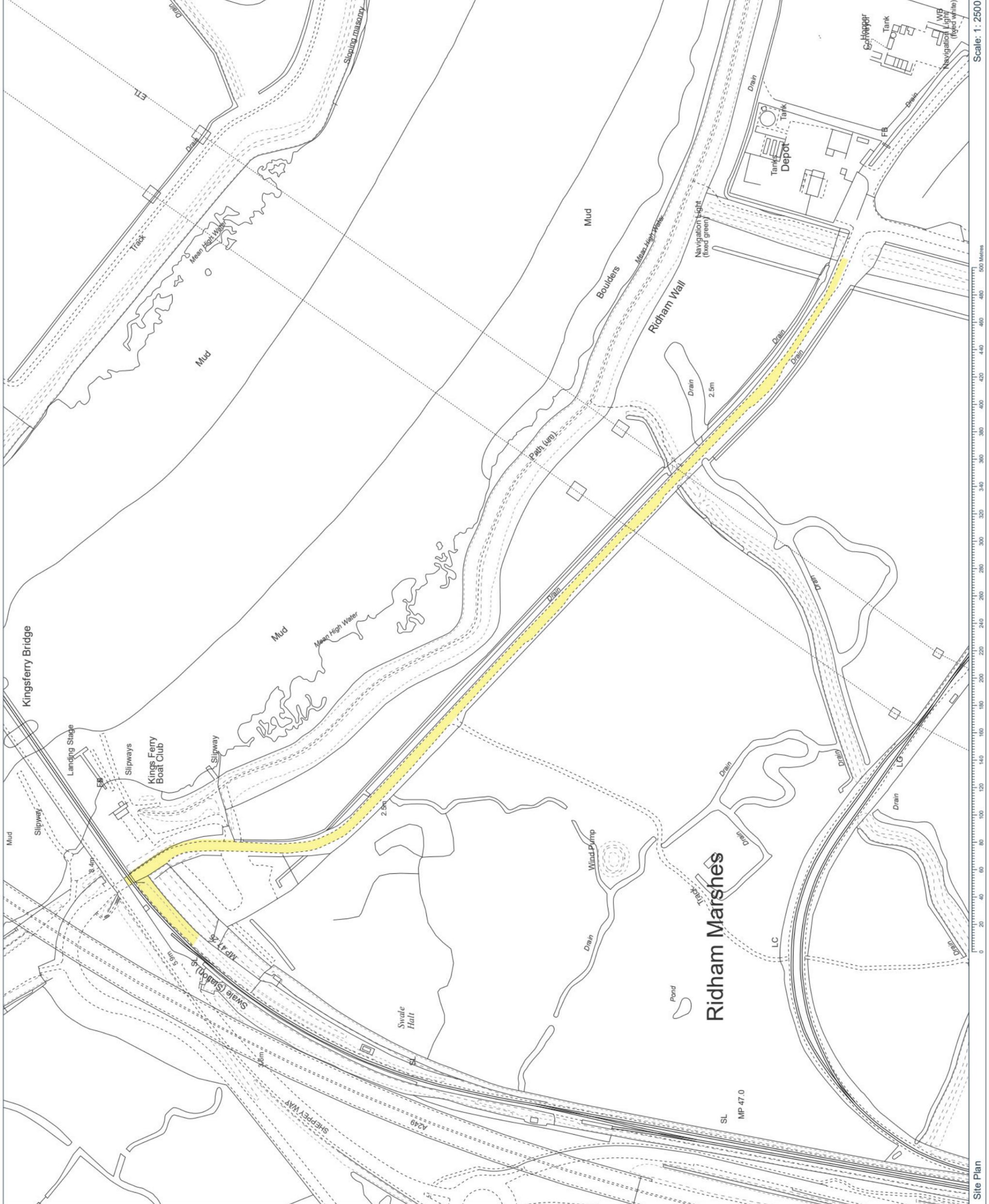
Drawing No: **180438_PLN_LO_485.1_A**

Rev	Date	Description
-	13.03.2024	First Issue
A	04.04.2024	Change Scheme Name

Drawn:	RA
Approved:	MA
Sheet No:	1 of 1
Sheet Size:	A3



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Site Plan Scale: 1: 2500



Key: Area of Ownership

TITLE BOUNDARIES BASED ON THE NATIONAL POLYGON DATASET

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Notes:

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936

Interest:
Outback UK Propco I A Limited

Location:
Land at Sheppey Way (B2231) and Kingsferry Bridge, ME9 8SS

Coords: 59 1510, 168966

Scheme Name:
Southern Gas Networks PLC (Kingsferry Gas Pipeline Replacement Project) Compulsory Purchase Order 2023

Drawing Name:
Land Ownership Plan

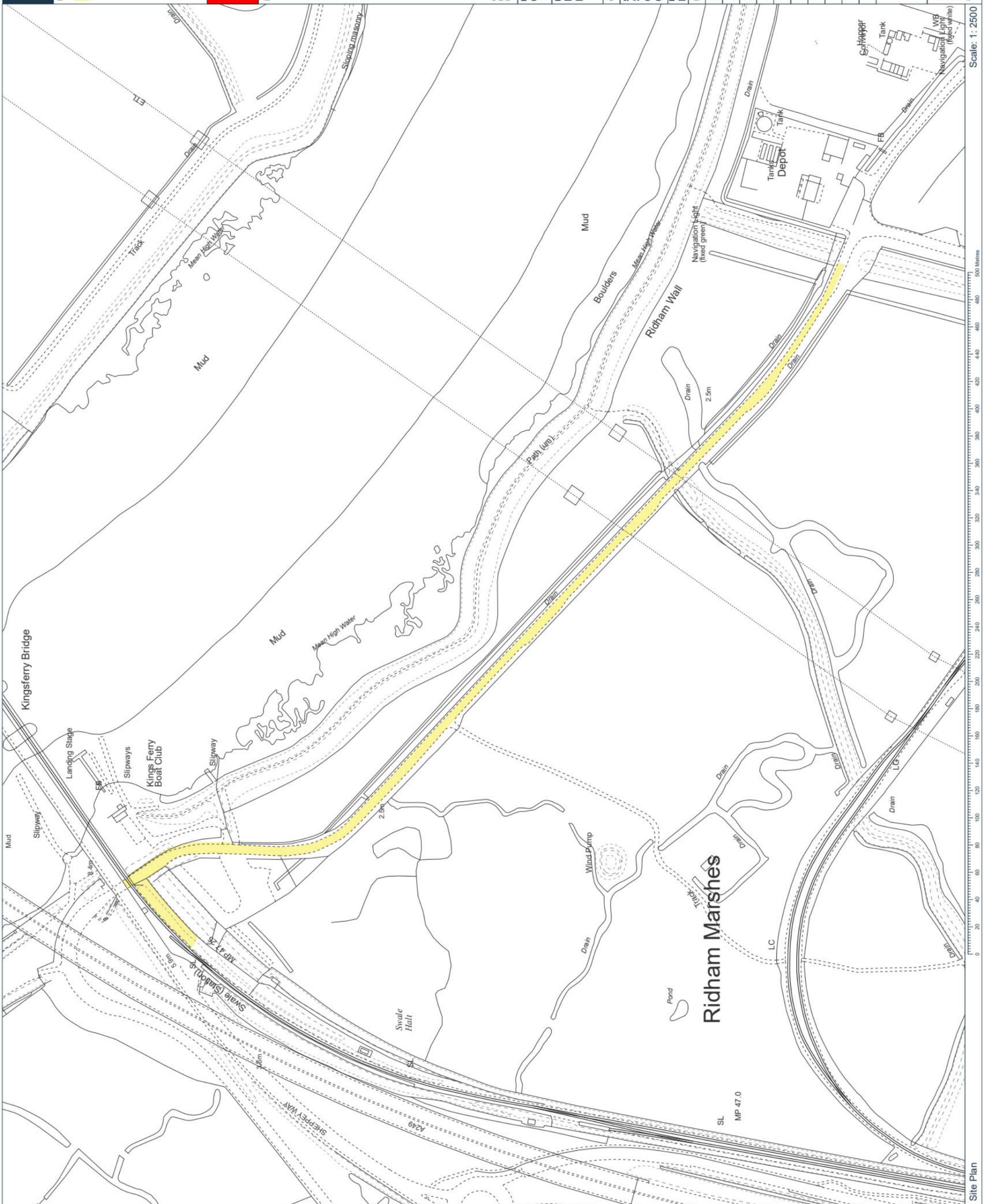
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Rev	Date	Description
-	13.03.2024	First Issue
A	04.04.2024	Change Scheme Name

Drawn:	RA
Approved:	MA
Sheet No:	1 of 1
Sheet Size:	A3



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Site Plan
Scale: 1 : 2500
0 20 40 60 80 100 120 140 160 180 200 220 240 260 280 300 320 340 360 380 400 420 440 460 480 500 Metres



Key: Area of Ownership

TITLE BOUNDARIES BASED ON THE NATIONAL POLYGON DATASET

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Notes:

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936

Interest: Network Rail Infrastructure Limited

Location: Land at Sheppey Way (B2231) and Kingsferry Bridge, ME9 8SS

Coords: 591410, 168847

Scheme Name: Southern Gas Networks PLC (Kingsferry Gas Pipeline Replacement Project) Compulsory Purchase Order 2023

Drawing Name: Land Ownership Plan

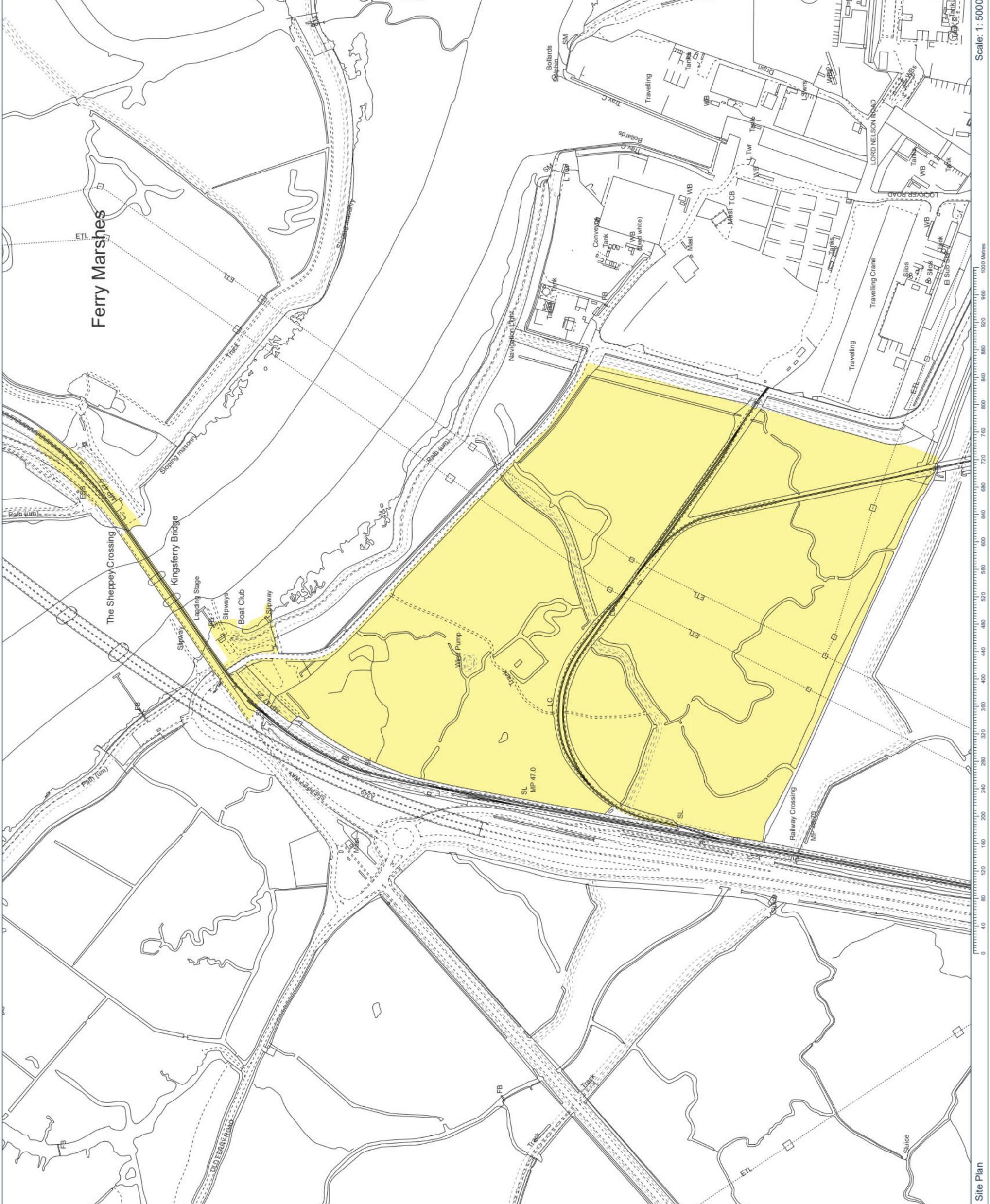
Drawing No: 180438_PLN_LO_486.1_A

Rev	Date	Description
-	13.03.2024	First Issue
A	04.04.2024	Change Scheme Name

Drawn: RA
Approved: MA
Sheet No: 1 of 1
Sheet Size: A3



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Scale: 1:5000
0 40 80 120 160 200 240 280 320 360 400 440 480 520 560 600 640 680 720 760 800 840 880 920 960 1000 Metres
Site Plan



Key:



Third Party Interest Area

TITLE BOUNDARIES BASED ON THE NATIONAL POLYGON DATASET

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Notes:

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936

Interest:
Ridham Sea Terminals Limited

Location:
Land at Sheppey Way (B2231) and Kingsferry Bridge, ME9 8SS

Coords: 59 1533, 168964

Scheme Name:
Southern Gas Networks PLC (Kingsferry Gas Pipeline Replacement Project) Compulsory Purchase Order 2023

Drawing Name:
Third Party Interest Plan

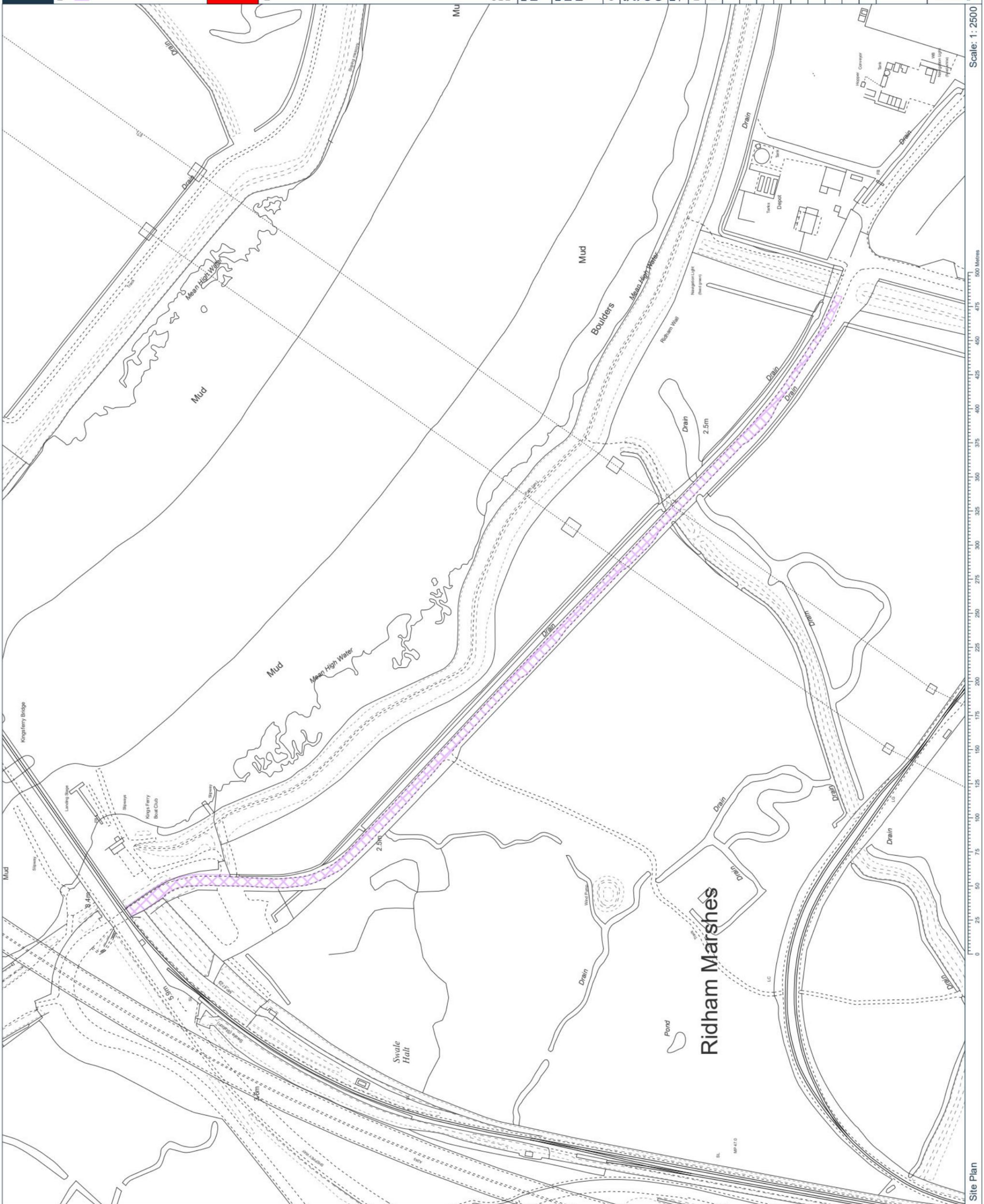
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Rev	Date	Description
-	14.03.2024	First Issue
A	04.04.2024	Change Scheme Name

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Scale: 1: 2500

Site Plan

Key:  Third Party Interest Area

TITLE BOUNDARIES BASED ON THE NATIONAL POLYGON DATASET

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Notes:

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936

Interest: Southern Water Services Limited

Location: Land at Sheppey Way (B2231) and Kingsferry Bridge, ME9 8SS

Coords: 59 1815, 168944

Scheme Name: Southern Gas Networks PLC (Kingsferry Gas Pipeline Replacement Project) Compulsory Purchase Order 2023

Drawing Name: Third Party Interest Plan

Drawing No: 180438_PLN_TPI_493.1_A

Rev	Date	Description
-	14.03.2024	First Issue
A	04.04.2024	Change Scheme Name

Drawn:	RA
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Sheet No:	1 of 1
Sheet Size:	A3



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Site Plan Scale: 1:7500

Appendix 5

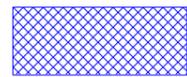
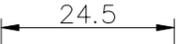
Southern Water's Apparatus

Appendix 6

Part of Ridham Dock Road affected by Order Works



KEY

-  Works area
-  Storage / Safety Zone
-  Traffic Cones
-  Pedestrian Barriers
-  Anti Vehicle incursion Barriers
-  Metric Dimensions
-  Vehicle Diversion
-  Pedestrian Diversion
-  Speed Limit



Diversion Route

- 
- Old Penny Road
- Sheppey Crossing (A249)
- Swale Way
- Barge Way

Diversion Route

- 
- Barge Way
- Swale Way
- Sheppey Crossing (A249)
- Old Penny Road



Unit 1, Merlin Business Park, Ramsgate,
Kent, CT12 5HW
EMAIL: info@franklininfrastructure.com
TEL: 01304802729

Kingsferry Bridge, Kent
ME9 8SS

DRAWING NOT TO SCALE

Date drawn 09/02/24

Drawn by BDS

Checked by JF

BDS0921

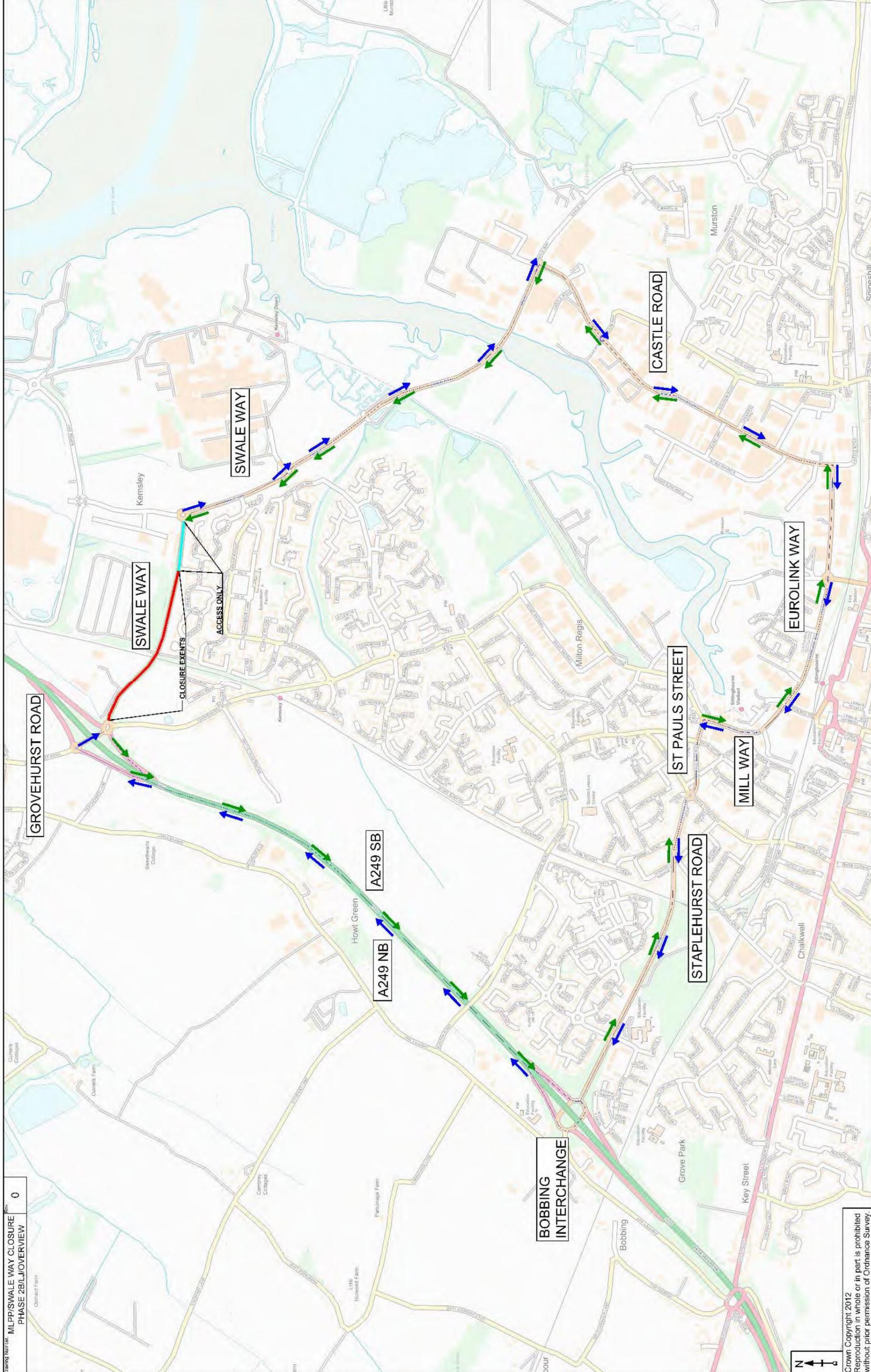
09022024-1

Original drawing size A3 - NTS

- 1) TRAFFIC MANAGEMENT WILL COMPLY WITH THE SAFETY AT STREETWORKS AND ROAD WORKS CODE OF PRACTICE (CHAPTER 8)
- 2) ALL BUS, PARKING AND LOADING BAYS SHOULD BE SUSPENDED WITH THE RELEVANT AUTHORITIES PRIOR TO COMMENCEMENT OF WORK.
- 3) WORKS VEHICLES TO BE PARKED WITHIN WORKS AREA.
- 4) TM PLAN IS DRAWN FOR ILLUSTRATIVE PURPOSES ONLY. CORRECT USE & PLACEMENT OF SIGNING, LIGHTING AND GUARDING ON SITE SHALL BE THE RESPONSIBILITY OF THOSE CARRYING OUT THE WORKS.
- 5) TM PLAN IS ONLY VALID 90 DAYS FROM DATE DRAWN AS ROAD LAYOUT MAY HAVE CHANGED

Appendix 7

Diversion



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Client:
Jackson

Project:
**JUNCTION
 UPGRADE**

Drawing Title: Site Address:
**A249,
 GROVEHURST,
 ME9 8RD**

Key
 Sign
 Pedestrian Barrier
 Road Closure Point
 Diversion Route
 Access Only

Diverted Traffic
 Diverted Traffic

Scale:	NTS
Draw No:	1 of 1
Page No:	0
Drawn Number:	MLP/PSWALE WAY CLOSURE PHASE 2B/L/OVERVIEW
Drawn Date:	0

- Notes
- All dimensions are in metres unless otherwise stated.
 - All traffic management to comply with Chapter 11 and any updates, and Safety at Street Works and Roadworks (A code of practice).
 - All road markings and signs to be as per the Traffic Signs Regulations and General Directions 2016.
 - All permanent traffic signals will be bagged and switched off, at all times that temporary traffic signals are being used. This should be done with approval from said authority.