

Useful links:

[Rule 6 Letter \(PD-009\) – PM Agenda at Annex A on page 8](#)

[Relevant Reps Exam Library](#)

[Examination Library](#)

1. Relevant Documents

- [Relevant Representations | Representation by Fieldfisher LLP \("Fieldfisher"\) on behalf of BPA dated 26 November 2025 \(RR-0413\) \(Internal Link\)](#) [REDACTED] / **RR-0413** submitted on 26 November 2025
- [EN020027-001094 Notification to wish to speak at the CAH1 and Issues Specific Hearing 1 dated 26 January 2026 \(Internal Link\)](#) (**PDA-011** submitted on 26 January 2026)

2. Notes for Oral Submission

2.1 Background

2.2 Emily Tetley-Jones Director at Fieldfisher LLP (Ms Tetley - Jones)

2.3 Joined by Rosa Simson at Fieldfisher LLP (Ms Simson)

2.4 We wish to speak to Agenda item 3 (Initial Assessment of Principal Issues)

2.5 We represent British Pipeline Agency Limited ("BPA") as agents for United Kingdom Oil Pipelines Limited ("UKOP").

2.5.1 UKOP is the owner of the 14-inch Thames to Epping high pressure multi fuel pipeline (hereafter called the "**Pipeline**") which is key National Energy Infrastructure forming part of the infrastructure supplying the National Airports and benefits from the associated land rights relating to the Pipeline.

2.5.2 BPA is employed as agent by UKOP to operate and maintain the Pipeline and act on its behalf in this DCO process

2.6 We have applied to speak at CAH1 and ISH1.

2.6.1 This submission is by way of update to:

- Relevant Representation **RR-0413**; and
- The items outlined in the request to attend CAH1 and ISH1, being examination document **PDA-011**

2.7 BPA and UKOP's position remain as described in its Relevant Representations **RR-0413**

2.8 BPA and UKOP do not object to the Application in principle, but do have significant concerns

3. Agenda Item 3 – Assessment of the Principal Issues

3.1 The ExA has decided to limit the scope of the preliminary meeting to consideration of how the application will be examined

3.2 The List of Issues is set out at Annex C of the Rule 6 Letter.

3.3 BPA / UKOP would like to request that the following items are required to be considered as part of the examination process:

(a) Cumulative Effects of the Project

(i) the infrastructure owned and operated by BPA and UKOP is critical national infrastructure and therefore robust safeguards are required in the short and long term, which cannot currently be guaranteed by the dDCO on its current drafting and with its current order limits.

(b) Good Design

(i) The Applicant must be able to deliver an adequate mitigation solution in order for the Project to be carried out safely

(ii) Any mitigation strategy must be deliverable by the Order powers, within Order limits and be able to directly benefit the owner and operator of the Pipeline

(iii) National Energy System Operator (NESO) electricity transmission design principles the use of avoidance and innovative technologies when dealing with assets of community importance and to minimise environmental impact

(c) Health and Wellbeing:

(i) Concerns for safety before during and after the works / energisation specifically in respect of the potentially hazardous effects of AC interference which is contrary to the UKOPA guidance submitted as part of examination document **PDA-011** and potentially a breach of British Standards and the Pipeline Safety Regulations 1996.

(d) Safety and Security:

(i) Importance of safeguarding our client's critical national energy infrastructure needs to be clearly understood as part of the examination.

(e) Socio - economics:

(i) Any disruption of or damage to this Pipeline could have very serious effects on:

(A) the Nationally Significant Infrastructure hubs supplied by the Pipeline and the economies they link to;

(B) The Environment;

(C) The Public

(f) Update:

(i) BPA / UKOP are working constructively with the Applicant to reach agreement but in the interim BPA/UKOP need to reserve their position.