

**Summary of Oral submissions made by Fieldfisher LLP ("Fieldfisher") on behalf of the British Pipeline Agency as agents for United Kingdom Oil Pipelines Limited at Compulsory Acquisition Hearing 1 on 11 February 2026.**

**Responding to Agenda Item 3**

Fieldfisher LLP ("Fieldfisher") submission on behalf of British Pipeline Agency Limited ("BPA") as agents for United Kingdom Oil Pipelines Limited ("UKOP") (Interested Party Reference Number [REDACTED]):

1. This submission is by way of update to the relevant representations **RR-0413** and the issues described in the notification to speak at the CAH2 and ISH1 **PDA-011** and the additional submission **AS-086** in respect of UKOP's 14 inch Thames to Epping high pressure multi fuel pipeline (the "Pipeline").
2. The Pipeline has a critical role in supplying fuel to major national infrastructure and it is therefore essential that it remains operational, safe and adequately protected. Any failure to do so would not only pose risks to persons and the environment but would also risk significant risks to fuel supplies to airports in the South-East.
3. The following three significant concerns are raised by way of particular mention in addition to the representations made in RR-0413, PDA-011 and AS-086.
  - 3.1 Under the proposed acquisition of rights as defined in the dDCO, the Applicant cannot currently guarantee that necessary mitigation can be installed / retained to enable UKOP to safeguard the Pipeline given that:
    - (a) the proposed mitigation is outside the dDCO limits; and
    - (b) the dDCO does not allow for the permanent acquisition of appropriate land rights to repair replace and maintain said mitigation for the operational life of the Pipeline.
  - 3.2 As set out in **RR-0413** and **PDA-011** there are significant risks to the Pipeline, the public and the environment inherent to crossing metal fuel pipelines with high voltage cables due to the potential for uncontrolled and accelerated corrosion of the Pipelines due to AC Interference.
  - 3.3 While BPA/UKOP appreciate the need for the Applicant to have compulsory rights within the land where the Project crosses the Pipeline, there does need to be agreement reached on the scope and extent of those rights and how these will interact with the requirements to ensure the continued safety and operation of a working fuel line.
4. Fieldfisher and BPA/UKOP note however that the Applicant has been engaging proactively with a view to finding solutions to these issues and working towards draft contractual protections.