

**Eversheds Sutherland  
(International) LLP**Two New Bailey  
6 Stanley Street  
Salford  
M3 5GX  
United KingdomT: +44 20 7497 9797  
F: +44 20 7919 4919  
DX 14344 Manchester

eversheds-sutherland.com

FAO Mr Andrew Thomas  
Herbert R Thomas  
59 High Street  
Cowbridge  
CF71 7YL**Date:** 3 February 2023  
**Your Ref:** XD-001 JW  
**Our Ref:** BARKERFI\342778-000018  
**Direct:** +44 746 874 9830  
**Email:** fionabarker@eversheds-sutherland.com**By Special Delivery and by email to AndrewThomas@hrt.uk.com**

Dear Mr Thomas

**The National Grid Gas plc (Western Gas Network Project) Compulsory Purchase Order 2022 ("the Project" and "the Order")**

We write in response to the objection to the above named Order dated 21 November 2022 submitted on behalf of your clients Mr David Gareth Jones and Ms Caroline Jones ("Objection").

We confirm that we act on behalf of NGG in respect of the promotion of the Order.

**Your clients interests in the land included in the Order ("Order land")**

We understand that your clients own land at Cilfrew, adjacent to NGG's Pressure Reduction Station, which comprises Order Plots 178 and 179 ("Plots").

**Inclusion of the Plots in the Order**

The purpose of the Project, which in summary comprises two new sections of pipeline (2km and 9km in length) and modifications to existing above ground installations, is to enable more gas to be transmitted from Milford Haven, and across NGG's transmission network.

The Order has been promoted to enable NGG to compulsorily acquire the land and rights it needs to construct the Project in the event that voluntary agreement cannot be reached. The Plots were included in the Order to enable NGG to create, use and remove a temporary compound and access to facilitate modification works to Cilfrew Pressure Reduction Station.

The design work which identified the need to carry out modification works and informed the land requirements at Cilfrew (i.e. the need for the Plots and Plot 177) was based on certain assumptions about the ability of existing pipework and equipment to safely flow gas at an uprated (increased) pressure. This is because essential data about the ability of the existing Cilfrew pipework/equipment to safely flow gas at an uprated pressure, which was required from the Original Equipment Manufacturers (OEM), took the OEMs longer than expected to obtain and provide to NGG.

As at October 2022 (when the Order was 'made'), the necessary information was still outstanding and NGG did not have certainty as to when it would be provided. The making of the Order could not be delayed beyond October 2022 because of the potential impact on the Project programme, and in particular, the need to access the land required for new pipelines and commence construction.

The new sections of pipeline will provide two thirds of the physical capability to flow more gas from Milford Haven (uprating will provide the rest), which is the overall purpose for which the Project and the Order are needed. Therefore the pipelines had to take precedence over the uprating.

The data required from the OEMs has now been received and reviewed by NGG. The data confirms that significant modifications would be required at Cilfrew Pressure Reduction Station to enable the pressure at which gas is flowed to be increased. The scale of the modification works confirmed as being necessary, would require the temporary closure of the Pressure Reduction Station and, in combination with other essential maintenance works across the local network, would unacceptably impact on the ability to transmit gas at sufficient pressure.

Given that the modification works at Cilfrew are not required to enable more gas to be transmitted from Milford Haven (only to retain current system flexibility), NGG have decided that the Cilfrew uprating modifications should be removed from the Project. Therefore, land at Cilfrew included in the Order for the creation and use of a temporary works compound and access thereto (the Plots) is no longer needed.

NGG will be writing to the Secretary of State for Business Energy and Industrial Strategy, to whom the Order was submitted for 'confirmation', to explain that the Plots are no longer needed and to request that they be removed from the Order.

Based on the information available to NGG at the time of making the Order, the benefits of carrying out modification works at Cilfrew Pressure Reduction Station to maintain system operating flexibility outweighed the disadvantages. NGG would however like to take this opportunity to apologise for any unavoidable concern that the inclusion of Plots in the Order has caused your clients.

We will write to you again once the Secretary of State has confirmed removal of the Plots from the Order. Should you/your clients have any questions in the meantime please do not hesitate to contact Fiona Barker of this office or NGG's appointed land agents, Fisher German- please contact Joe Senior [Joe.Senior@fishergerman.co.uk](mailto:Joe.Senior@fishergerman.co.uk) / 07817119488.

Yours faithfully

*Eversheds Sutherland (International) LLP*

**Eversheds Sutherland (International) LLP**

**cc John McKenna , Department for Business, Energy and Industrial Strategy**