

Application by Highways England for an Order Granting Development Consent for the A1 Birtley to Coal House Improvement Scheme

Written Representations of Northern Gas Networks Limited

SUMMARY

Northern Gas Networks Limited (“**NGN**”) is committed to working with Highways England (“**HE**”) so that the A1 Birtley to Coal House Improvement Scheme (the “**Scheme**”) can be delivered.

NGN has sought to work with HE to enable the construction of a Compressed Natural Gas station (“**CNG Station**”) within Plot 3/6c. The CNG Station will form part of a national network of such stations which will significantly reduce the environmental impact of heavy goods vehicles and may also provide a platform for the transition of road transport to a hydrogen as a fuel source, therefore decarbonising road transport.

There are very few sites which are suitable for a CNG Station, due to the requirements for (a) access to a higher-pressure gas network, (b) accessibility from major arterial routes and HGV Volumes and (c) land availability for development. For this reason, NGN is seeking an amendment to the Scheme so that the CNG Station is not adversely affected.

NGN welcomes the dialogue that has taken place with HE to date, particularly regarding potential amendments to the Scheme. However, NGN has found it difficult to obtain details regarding the proposed use and duration of occupation of Plot 3/6c within the Scheme *in the form which is currently under consideration by the Planning Inspector*. For that reason, NGN does not consider that HE has made a clear and compelling case in the public interest for the acquisition of NGN’s land at plot 3/6c, and in particular the proposed site of the CNG Station.

NGN also has concerns about the protective provision contained within the draft DCO, which are detailed in NGN’s Written Representations

DETAILED WRITEN REPRESENTATIONS

INTRODUCTION

1. Northern Gas Networks Limited (“**NGN**”) makes these Written Representations further to the Relevant Representation which NGN submitted on 11 November 2019.
2. Compressed Natural Gas (“**CNG**”) refuelling stations, although a recent introduction into the UK, have been commonplace in Europe for the last 20 years. There are around 4000 stations across Europe, which are located in a range of different scenarios from public highway stations, bus depots and refuse truck depots. The network in the UK is less well developed, particularly in the North East of England.
3. NGN in association with ENGIE, have identified the need to bring the UK transport sector up to speed with its European counterparts. The importance of reducing the UK’s carbon emissions is widely accepted across national and local government. In response, NGN has identified a sweet spot in the network where a CNG fuelling system would not only aid in decarbonisation, but would allow for cleaner, more efficient connectivity between the North and South.
4. NGN has gone through a detailed process to select a preferred partner in July 2019. The opportunity brief which NGN shared with the market is attached at Annex B. ENGIE was subsequently selected for that role, and we attach a letter at Annex C which ENGIE has provided to NGN in support of NGN’s Written Representations.
5. NGN has made it clear to Highways England (“**HE**”) that in order to carry out its proposal for a CNG filling station (the “**CNG Station**”), it will require a small area of the land which HE wishes to temporarily acquire for a construction compound to assist in the A1 Birtley to Coal House Scheme (the “**Scheme**”). However, as raised in the Relevant Representation dated 14 November 2019, NGN objects to the amount of land being acquired by HE and submits that insufficient reasoning has been provided by HE. NGN would now like to take this opportunity to expand on the Relevant Representation in the following ways:
 - a. Provide reasoning as to why NGN wishes to retain a small portion of Plot 3/6c, emphasising the environmental benefits of the project
 - b. Highlight the lack of co-operation from HE, specifically to the fact that they have not engaged in any meaningful conversation in the hope of reaching any agreement in relation to Plot 3/6c, despite the best efforts of NGN. We understand that this may be because of the late appointment of a contractor, but nevertheless NGN has not had the opportunity to review HE’s plans.
 - c. Explain why HE are over-acquiring the land, in particular detailing why the plans submitted in the DCO to date are insufficient and show a clear lack of consideration for the site as a whole.

BACKGROUND TO CNG PLANTS

6. CNG refuelling technology is well understood, low in complexity and has clearly defined industry safety standards by which it is installed and operated.

7. The benefit of a CNG station is that it limits the storage of hazardous fuels on site as it takes natural gas from the grid and stores a relatively low quantity of gas for daily usage. The station does not require hazardous substance consent and typically the safety distances that apply to the station will fall within the area of land allocated to site the station. CNG stations are generally designed, constructed, maintained and operated in accordance with these specifications below;
 - a. ISO 16923:2016
 - b. Institution of Gas Engineers and Managers (IGEM): IGEM/UP/20
 - c. British Compressed Gases Association (BCGA): Code of Practice 41
8. The station will be fitted with a range of industry standard safety features to ensure that all relevant safety requirements are complied with. It is not envisaged that the presence on the station will impact the work on the rest of the land in any way. The station has been designed to be installed in busy operational environments and all activities will be entirely within the compound area allocated for the station with the land around the station providing a natural buffer to other activities onsite.

NGN'S PROPOSED SCHEME

9. The location of the proposed CNG Station is shown at Annex B, Fig 1 (the "CNG Site").
10. Although the project is in its early stages, NGN does not anticipate any difficulties in obtaining planning permission for the CNG station. In addition, despite HE being aware of the proposal for a number of months, no concerns or objections have been raised.

REASON FOR LOCATION OF PROPOSED SCHEME

11. In developing the proposal for the CNG station, a suitable location has been of key importance to ensure that the project is able to deliver high environmental benefits whilst remaining economically viable. This is because a number of features all need to be present:

- a. **Access to a higher-pressure gas network.**

CNG stations require a connection to the gas transportation network, and they require gas to be delivered at a high pressure. The cost of connecting to a higher pressure gas pipeline is, by nature of the engineering required, an expensive operation. For this reason, unless a potential CNG site is situated close to a high pressure gas main, the costs of creating a new connection will be prohibitive.

The Scheme requires NGN to divert the existing gas supply to a plot of land owned by NGN south of the carriageway. As a result, the higher-pressure gas pipes would run within a few metres of the proposed CNG site, meaning easier connection and lower costs.

- b. **Accessibility from major arterial routes and HGV Volumes**

To deliver the greatest environmental and economic benefit, a CNG site should be placed in an area where there is a high volume of HGV activity to enable as many vehicles to utilise the natural gas as possible. It needs to be easily accessible and, with the low number of CNG fuelling stations already in the UK, the proposed site will not only provide large environmental benefits, it will allow greater connectivity to the North of England and Scotland.

The proposed CNG site is situated on a major junction on the A1M at the head of the Team Valley Industrial estate. The Team Valley Industrial Estate is described as one of the largest industrial estates in Europe and has circa 700 business located on it employing 25,000 people. The high number of HGV's which utilise the Team Valley Industrial Estate has been an important factor in selecting the location of the CNG Site. Over 5000 heavy trucks per day pass along the section of the A1M where the proposed CNG station is situated. As such, the potential environmental and economic benefits of the site are huge.

C. Land availability

The proposed CNG site is located on land which is not only suitable due to the close proximity of higher pressured gas pipes and its connectivity to a main arterial transport route, it is also land which is already owned by NGN. As a result, no third party consent needs to be obtained which is a major benefit to the deliverability of the project.

IMPACT ON THE SCHEME IF LAND IS OCCUPIED BY HE

12. NGN understands that it is HE's intention to occupy Plot 3/6c for up to four years, which would result in significant delay to the delivery of the CNG Station. This would delay construction of the CNG Station, and consequently the realisation of the environmental benefits delivered by the CNG Station for a period of up to four years, resulting in higher levels of pollution during that time. Furthermore, given that CNG is an emergent technology, and given the scarcity of suitable sites as NGN has outlined above, there is a risk that the delay of the CNG Station at Lamesley could have the effect of delaying the transition to cleaner fuels across the North of England.
13. CNG is also predicted to play an important role in the transition of road transport from petrol/diesel fuels to hydrogen as a fuel, which would effectively decarbonise road transport. Delays to the establishment of a viable CNG network in the North of England could therefore have the second-order effect of delaying the decarbonisation of road transport.

ENGAGEMENT WITH HIGHWAYS ENGLAND TO DATE

14. From the offset, NGN has maintained open and honest communication with HE in every aspect of the deliverability of the Scheme. This includes the matter of the CNG filling station, which HE is fully aware of and has been for a number of months. NGN has repeatedly requested the opportunity to work closely with HE to allow the CNG Station to be accommodated. The following timeline indicates the lines of communication which NGN have opened with HE in relation to the CNG site, and unfortunately show the unwillingness of HE to respond to the proposal put forward by NGN and the further failure to provide NGN with any information as to how to move forward with the project. In contrast, NGN has been extremely forthcoming in giving detailed plans and information regarding the proposed site and has asked on various occasions for HE to clarify what further information they require, yet such requests have been ignored, delaying any meaningful headway being made.

21st August 2019 – NGN held a meeting with HE/CJP to inform them that NGN wished to retain 8,904.m2 of land – sketch issued to HE/CJP. Following this meeting, NGN immediately provided HE with a plan of the proposed CNG site, followed by a further detailed plan which was provided without hesitation.

21st October 2019 – Meeting held with HE and NGN (Derfel Owen, Ian Whitehead and David Gill in attendance) to discuss NGN retaining land for the CNG Station. Following this meeting, NGN provided HE with further detailed plans of the CNG site, along with information regarding traffic flow and a proposed time line, as had been requested by HE.

11th November 2019 – Following a lack in any further communication from HE, NGN submits Written Representations (via National Infrastructure Planning website) to HE retaining all of NGNs land for the temporary construction compound. Following discussions with ENGIE and in an attempt to maintain a good working relationship with HE, NGN submitted that they would be able to reduce the footprint of the land required for the CNG compound by a significant amount – from 8,904.m2 to 5463.m2. This was issued to HE/CJP with no response.

6th January 2020 - NGN contacted HE requesting a meeting to discuss the CNG site in relation to the construction compound as detailed in the draft DCO. After a delay of 4 days, HE responded saying that a meeting would not be able to take place and that the planning team at HE would be unable to give any definitive answers about the CNG filing station.

10th January 2020 – Another telephone held between HE and NGN to discuss NGN retaining land for the CNG station.

21st January 2020 – NGN and HE discussed the accommodation of the CNG land within HE's revised scheme. NGN also requested more detailed information about the current scheme.

29th January 2020 – Meeting with HE and HE's main works contractor. HE was forthcoming about how the CNG Station could be accommodated within the revised redline plan. However, despite NGN's request more detail was not received regarding the existing Scheme.

HIGHWAYS ENGLAND IS OVER-AQUIRING

15. In the Relevant Representation submitted on 14 November 2019, NGN raised its objections in relation to HE's acquisition of Plot 3/6c stating that they are not satisfied that HE needs to acquire the amount of land requested for use as a construction compound and that an insufficient effort has been made to negotiate the plot of land prior to submission of the DCO.
16. In addition to this Representation, NGN does not consider that HE has made out its case for why it needs to occupy the site of the proposed CNG Site.
17. Any compulsory acquisition or occupation of land is the exercise of a public power to interfere with the property rights of a private individual. Such powers should only be exercised where there is "a compelling case in the public interest".
18. Despite NGN continually pressing HE for its justification of the land requirements, NGN has not received a detailed justification from HE explaining why it needs to occupy the CNG Site, or a timetable which clearly demonstrates the duration of the intended occupation. There is only one plan which purports to show the way in which HE will use the land at the Junction 67 Compound, which can be found on page 68 of the Outline Construction and Environmental Management Plan (the "**Outline CEMP**").

19. This drawing shows the CNG Site as being occupied by a topsoil screening bund and a staff carpark. NGN does not consider that this drawing reflects the results of a detailed study of HE's requirements. NGN considers this drawing to be a rough schematic, which may not reflect the final use of the Works Compound. For example it would be unusual if the land requirements for the Plant Store (I), the Material Store (J) and the Subcontract Store (K) were precisely equivalent, which they appear to be on this drawing. We also suggest that the positioning of a site office (which we presume would be installed by a crane) beneath a pair of high voltage power lines demonstrates the provisional nature of the drawing and a clear lack of care and consideration for the site compound, despite repeated objections to its use.
20. There is other land in the vicinity of the Junction 67 Compound which HE could have sought to acquire in the months following NGN making clear its requirement, particularly to the South of the compound. HE could and should have had regard to NGN's representations, and could have submitted revised redline plans. We are aware that HE is doing this now, and we are grateful that efforts have been made to accommodate NGN within the new scheme. Depending on the detail of the revised redline, NGN would be minded to support such a move by HE. However currently this proposal has not been accepted by the Inspector as forming part of the Scheme, so we do not address it in detail in this representation.

PROTECTIVE PROVISIONS

21. NGN is in ongoing contact with HE's solicitors regarding the Protective Provisions with the draft DCO. NGN's principle concerns are around the following areas:
 - a. Paragraph 7(6) of Schedule 11 of the draft DCO which gives the Highways England the power to construct or remove gas apparatus. NGN objects to the inclusion of such a provision as such interference with NGN's assets would pose a risk to the gas supply to NGN's customers. There are very limited circumstances under which NGN permits third parties to carry out works on its network, and this is always subject to stringent terms and conditions, and vigilant supervision by NGN. We therefore object in the strongest possible terms against granting any power to HE to carry out works on NGN's network, and we would always seek instead to work with HE to achieve the outcomes envisaged by the DCO.
 - b. Paragraph 9 of Schedule 11 of the draft DCO authorises HE to carry out works in the vicinity of NGNs apparatus. Whilst NGN is committed to working with HE in the delivery of the scheme, NGN has serious concerns about the mechanism within paragraph 9(3) which assumes NGN's approval of any proposed works after a period of 21 days of having been notified by HE. For health and safety reasons, and to ensure that the supply of gas is not interrupted to its customers, NGN requires that its explicit approval be sought for works in the vicinity of its apparatus, and would urge that the draft DCO is modified to reflect this requirement.

COMPENSATION

22. HE will have to pay compensation to NGN for its temporary acquisition of NGN's land. Given the strategic value of this CNG Site, and its demand on the open market, the value of the CNG

Site could be considerable. NGN considers that there is land available in the vicinity of the Junction 67 Compound which HE could acquire which would represent better value to the taxpayer than the CNG Site.

Northern Gas Networks Limited

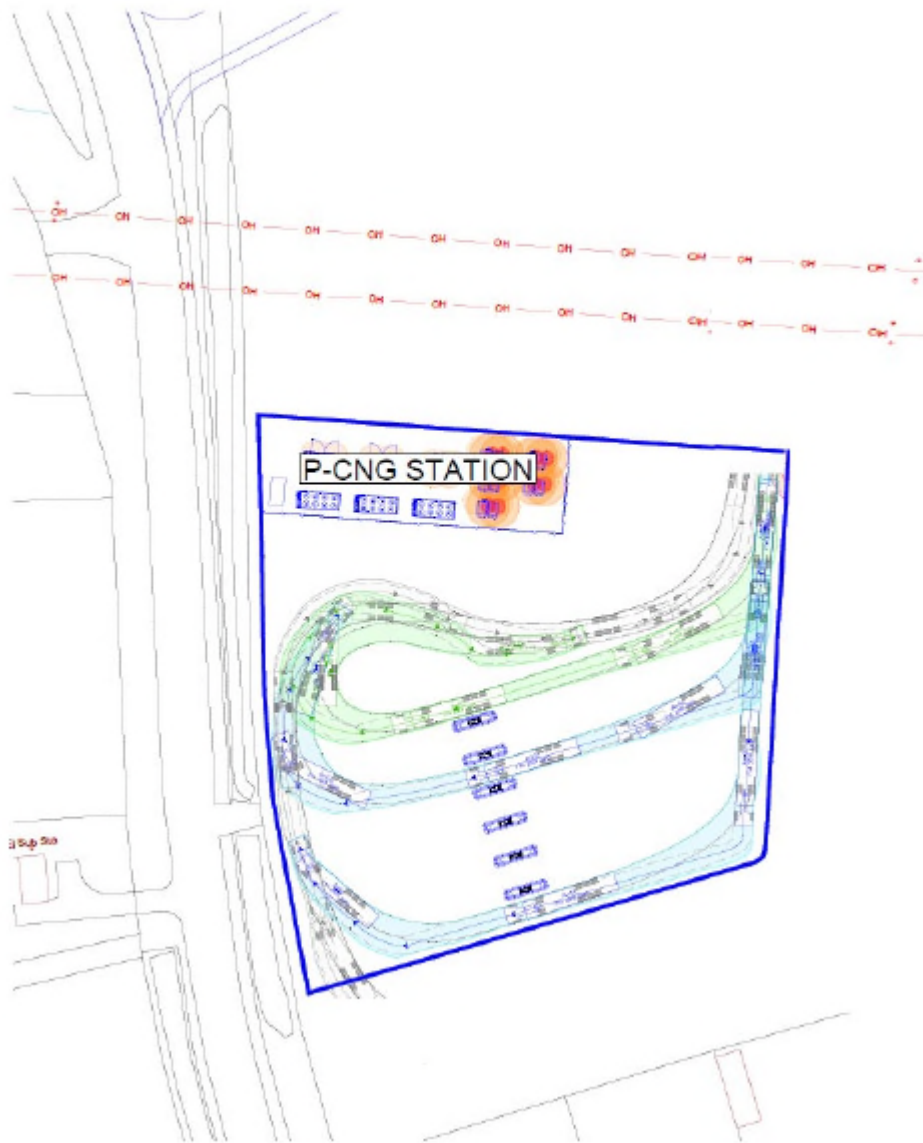
4 February 2020

Annex A

Fig 1. CNG Site (Shown in Red)



Fig 2. Provisional Layout



ANNEX B
Opportunity Brief

Lamesley

Opportunity Brief

July 2019

Table of Contents

- 1. Introduction**
- 2. What's the Opportunity?**
 - a. Location
 - b. Technical Details
 - c. What NGN is offering
- 3. Next Steps**
 - a. Lamesley Project Briefing
 - b. Expressions of Interest
 - c. Submission of Proposals
 - d. Assessment Criteria
 - e. Contact Details

1. Introduction

We are about to commence a project for Highways England, to help facilitate the improvement and widening of the A1 Birtley to Coal House main road and the replacement of Allerdene railway bridge.¹

NGN's involvement in this project will be to divert our assets and relocate them to the south of the existing A1. This includes diverting four existing gas pipelines:

- 450NB High Pressure (HP) steel main;
- 450NB Intermediate Pressure (IP) steel main;
- 355NB Medium Pressure (MP) steel main; and
- 150NB Low Pressure (LP) spun iron main.

A new Above Ground Installation (AGI) will also be constructed to the south of the A1. The AGI will comprise of two sets of regulators to carry out pressure reduction across two tiers, new filters, new metering skid, a boiler house package, new heat exchangers, a backup generator and an electrical and instrumentation kiosk.

Importantly, the new AGI will have a connection to facilitate a future CNG filling station.

Two new District Governors shall be installed within the existing AGI compound to the north of the scheme in order to provide gas to the Team Valley Trading Estate and the Low Fell area of Gateshead.

A new IP pipeline will be diverted underneath the A1 via a 160m micro tunnel (1.2m OD) which includes two 6m deep reception/receiving shafts and will be routed between the new foundations of the new road bridge. Once the tunnel has been constructed and the two new AGIs have been commissioned, work involving the abandonment and diversions of the HP, IP, MP and LP pipelines affected can be carried out. The scheme also involves the decommissioning and disinvestment of the existing AGI at Lamesley.

The project is a Nationally Significant Infrastructure Project, as defined by the Planning Act 2008.

2. What's the opportunity?

Through this project, we've identified an opportunity to pre-install a connection for a CNG fuelling station. Pre-installing this connection would be at a significantly lower cost to a CNG developer, compared to retrospectively installing the connection assets.

¹ For further information on the project, please refer to <https://highwaysengland.co.uk/projects/a1-birtley-to-coal-house/>. Please note that these works are priority for NGN and will be completed ahead of the opportunity outlined in this document.

Given the proximity of the location of this project to key arterial roads in the North, we think this presents an excellent opportunity to establish a CNG refuelling station. We note that this document is not an offer capable of acceptance in contract terms. Rather, it is a prompt to further explore the potential of establishing a CNG refuelling station on this site.

a. Location

Figure 1: Location context



Figure 2: Location of existing assets



Figure 3: Proposed location of new assets



b. Technical Details

Table 1: Technical Details

Pressure	<ul style="list-style-type: none"> • All pressure tiers are available. • The pressure ranges for each tier in this location are as follows: <ul style="list-style-type: none"> ○ Low Pressure (LP): up to 75 mbar ○ Medium Pressure (MP): 75 mbar – 2 bar ○ Intermediate Pressure (IP): 4 bar – 7 bar ○ High Pressure (HP): 10 bar – 17 bar
Land size	<ul style="list-style-type: none"> • We have a significant parcel of land to house the new assets we'll be constructing. • Approximate size of the parcel of land available during construction is around 9,000m² (or 2.2 acres). • For comparison, the Waitrose CNG station at Leyland is around 2,750m².

Maximum Offtake

All pressure tiers are available at this location. Table 2 below provides an indication of the volume of gas that could be extracted from our network, by pressure tier.

Table 2: Maximum Offtake Ranges

	4 inch	6 inch
Intermediate Pressure	6,000scm/hour	13,000scm/hour
High Pressure	13,000scm/hour	30,000scm/hour

Note: Low and medium pressure connection capacities can be discussed on an individual basis.

Please note that the CNG plant operator may be required to sign a Network Exit Agreement (NEXA) with NGN, which is a regulatory document outlining the offtake rates etc.

c. What NGN is offering

We are proposing two items in relation to this project:

1. **Flexible access to land** – we are proposing to enable development of a CNG refuelling station on land that we currently own and will work with you to develop a sale/lease agreement on NGN terms that supports the development of CNG infrastructure and protects NGN’s interests. We will work with an independent valuer to determine the market value of the land. ²
2. **Low cost connection** – we estimate that the upfront connection to our network will cost around £20,000-£30,000, which we will recover from the CNG developer as we would with any other connection to our network. However, this is significantly lower than you’d expect to pay for installing a connection retrospectively, on existing assets.

Specific NGN terms and conditions will be agreed with the successful applicant, however we note our intention to be as flexible as far as is reasonably practicable, with a view to supporting the development of the site for CNG refuelling infrastructure.

We consider that these offerings provide an ideal opportunity for a CNG developer to utilise the site. We want to partner with an organisation (or group of organisations) who share our vision for this site and the potential of CNG for transport in Great Britain.

3. Next Steps

a. Lamesley Project Briefing

We will be holding a Lamesley Project Briefing on **Wednesday 21 August** to discuss this project opportunity further with interested stakeholders.

² Please note that any relevant planning permissions will be the responsibility of the successful applicant.

Details of this briefing are as follows:

Date Wednesday 21 August
Time 1pm – 4pm (with afternoon tea and networking from 3pm onwards)
Location Leeds

This briefing will be used to focus specifically on the Lamesley site and we ask interested parties to register their interest in attending by Fri 9 August via our [website](#).

b. Expressions of Interest

Following the briefing, we will circulate a Pre-Qualification Questionnaire to attendees and will call for interested parties to formally submit an expression of interest.

c. Submission of Proposals

For interested parties, the deadline for proposals is **Monday 16 September 2019**.

Specific details on what the proposals should include will be outlined in the PQQ document but if you have any initial questions on this, please contact Tim Harwood on 07 880 007 365 or tharwood@nothergas.co.uk.

Please also note:

- Proposals that do not meet the PQQ criteria will not be assessed further.
- Although this opportunity is not a procurement event or subject to procurement rules, the assessment stage will be managed via NGN's electronic tender portal. If you are successful through to the assessment stage (i.e. you meet the PQQ criteria) you must be registered on Ariba by the publish date specified. If you are not already registered it is free to register and can be accessed via this link: <http://NGN.supplier-eu.ariba.com/ad/register/SSOActions?type=full>.³

Following the deadline for proposals, we may provide you with an opportunity to present your proposal to NGN staff. This will be confirmed after the proposal deadline.

d. Assessment Criteria

The assessment criteria that will be used to select the successful proposal are outlined in Table 3.

³ It is recommended that you register at least 48 hours prior to the publish date and that you use Google Chrome or Firefox when using Ariba, as some versions of Internet Explorer does not support Ariba.

Table 3: Assessment Criteria

Criteria 1	The technical feasibility of the proposed project.
Criteria 2	The commercial feasibility of the proposed project.
Criteria 3	Deliverability of the project within a reasonable timeframe.
Criteria 4	The financial standing of the bidder.
Criteria 5	The extent to which the project demonstrates the potential of the CNG industry and contributes to growth of the industry in Great Britain.
Criteria 6	The contribution of the project to reducing carbon emissions and improving air quality.
Criteria 7	Value added to NGN (subject to regulatory constraints).

Further detail on the assessment criteria will be provided in the PQQ document.

e. Contact Details

If you have any questions relating to the opportunity or next steps, please reach out to Tim Harwood at tharwood@northergas.co.uk or 07 880 007 365.

Annex C

Letter in support of NGN's Written Representation



Northern Gas Networks

4th February 2020

Dear Sir/Madam,

Lamesley CNG station development

On behalf of ENGIE, I am writing to offer our support for your written representation to appeal the DCO to enable access to a small area of land at your Lamesely site for the deployment of a Compressed Natural Gas (CNG) station and in the future a multi-use green mobility hub. ENGIE are the preferred partner for the development of this scheme and this letter outlines our view on the importance of this project in demonstrating and encouraging growth in the investment of low emission vehicles, refueling infrastructure and the supporting supply chain in the UK.

The project at Lamesley is to develop a green mobility hub offering a choice of low and zero emission fuels to different user groups and to offer complimentary services. In the 1st phase the objective is for ENGIE to invest, own and operate a Bio-CNG refueling station with the possibility of also installing electric vehicles charges points.

ENGIE believes that the Lamesley CNG project is a critical demonstration in the UK of this refueling technology for low emission vehicles especially on the heavy truck segment where rapid transformation is needed for cities and business to tackle climate change. The location of the Lamesley has a combination of unique features that presents the site as an important platform for demonstrating and encouraging greater investment in the low emission sector across the UK.

Specifically, the Lamesely location presents the following key benefits: -

- Proximity to a high pressure, high volume grid connection point adjacent to one of the most traffic dense main arterial routes in the region.
- The section of the A1M captures both local and trans regional heavy-duty traffic
- Close to the team valley estate, extending the availability of low/zero emissions to local businesses
- The Lamesley development is also close to large housing estates of Gateshead and would contribute to a reduce in local emissions as well as regional emissions from traffic travelling longer distances

The first development planned at Gateshead/Newcastle is in an area that has no existing gas refueling infrastructure and has a large population of heavy vehicles passing through the area contributing to emissions. Over 5000 heavy trucks per day pass along the section of the A1M where the station is planned to be developed. This section is near areas of business and housing. As the location is also near an important interchange it would refuel vehicles travelling north, south and east contributing to emissions reductions across the region.

The deployment should not impinge on any other activities on the land. The construction work required will be entirely contained in the allocated space and can be scheduled to minimize any disruption. ENGIE would seek to work collaboratively with other site users during the station deployment phase and in ongoing operation of the station.

ENGIE hopes that this station will act as a lighthouse project, demonstrating the use of natural gas in the UK and to be the catalyst for further investments across the region and the country encouraging industry to invest to deploy stations that would create a UK wide network and encourage rapid take up natural gas vehicles. This will not only contribute to improvements in air quality and carbon emissions reduction but also the inward investment will create jobs, expertise and skills in low emission fuel technologies and development of associated supply chains and services.

To date both ENGIE and Northern Gas Networks have invested significant time to develop the project and have generated interest from a range of local business who are seeking to decarbonize their transport operations. In 2019 the UK government declared a climate change emergency to acknowledge the rapid transformation needed to address emissions. Over 60% of local authorities including Newcastle, the North East Combined Authority and Gateshead have now declared a climate change emergency and set net zero carbon targets mostly to be achieved by 2030.

This project is aligned to supporting these objectives and, in our view, rapid change is required to enable the required reductions by 2030. In this respect a delay in the deployment of low emission refueling technology will strongly limited emission reductions and fail to capture the interests and ambitions of businesses in the Newcastle/Gateshead and national fleet operators with fleet travelling to and through the region.

Yours Sincerely,

Nick Power
Business Manager – Green Mobility

Engie Services Limited
Kings Yard
1 Waterden Road
Queen Elizabeth Olympic Park
London
E15 2GP