From: [redacted]
To: Lower Thames Crossing
Cc: [redacted]
Subject: Principal Areas of Disagreement (PADS) Tracker - National Gas Transmission Plc
Date: 10 March 2023 14:26:16

Dear Sir/Madam

Please find below a Principal Areas of Disagreement Summary (PADS Tracker) sent on behalf of National Gas Transmission in response to the Examining Authority's Procedural Decision Notice issued on 19th December 2022.

Kind Regards
Vicky

No.	Principle issue in question	NGT Concern	NGT Proposed Resolution	The likelihood of the concern being addressed during the Examination stage	SoCG Reference	LTC Comment
1.	**24 Hour Working (Tunnel Boring Machine)**	NGT require 24 hour working, in particular whilst operating the tunnel boring machine ("TBM") required for each of the Proposed Diversions. This will involve the TBM operating 24 hours a day and the associated above ground compounds also being active 24 hours a day.	Confirmation and assurances required from the Applicant that this work has been adequately assessed in the Environmental Statement and will be adequately consented in the DCO.	NGT considered that this matter can be addressed subject to the Applicant providing the confirmation suggested. The Applicant has recently provided a further technical paper which NGT will review to see of this addresses the matter.	2.1.3	The project intends to issue a technical note "HE540039-LTC-VUT-GEN-TNT-UTI-00001 - 24/7 Working in connection with Gas Pipeline Diversions Beneath the A122 West Of Thong Village" addressing these concerns. A copy of that paper is attached.
2.	**Conflict of design with SGN proposal**	SGN Works (Work No G1b) shown on Work Plans conflict unacceptably with NGT diversions and cannot be built out as currently being consented in the dDCO.	Confirmation from the Applicant that design has been updated to remove conflict issue.	NGT consider that this matter can be addressed. NGT are reviewing the precise technical details of the updated Works Plans as provided by The Applicant.	2.1.12	Works plan (AS-028) - 2.6 Work Plans - Volume B - Utilities - (Sheets 1 to 20) (Version 2), Sheet 6. The applicant considers the design contained with the aforementioned document is as agreed in consultation between the Applicant, NGT and SGN prior to the submission of the application.
3.	**A2/Claylane Wood Attenuation Pond**	Conflict of design with proposed attenuation pond within NGT diversion route/future easement strip. As currently proposed this is unacceptable to NGT.	A2/Claylane Wood attenuation pond needs to be moved out of the way of the future NGT easement strip.	NGT considered that this matter can be addressed subject to the Applicant providing the confirmation suggested.	2.1.14	The Applicant acknowledges that this conflict in the preliminary design exists, as made known at SoCG item 2.1.14, and shall be resolved at the detailed design once all of the Works alignments and associated constraints are known to the Project. The Project and NGT agree for this to be agreed separately at the Detailed Design.
4.	**Phasing of Works**	Whilst the	Confirmation that the	The Applicant has	2.1.9 &	As per Section 4 of

	and Division of Responsibility	Applicant has stated to NGT that it is the Applicant who will be responsible for delivering mitigation and enabling works to allow NGT to undertake diversionary works, this is currently unclear in the application documents	Applicant and/or its main delivery partner will undertake all necessary preparatory surveys (including ecological/archaeological), mitigation and enabling works (including tree removal, accesses, haul roads, compounds and fencing) in order to allow NGT's contractors to commence works in respect of the Proposed Diversions in accordance with agreed programmes.	confirmed: As per Section 4 of the CoCP, "*National Highways is responsible for the delivery of the Project and its implementation However, National Highways will appoint Contractors and agents to implement the Project*" As per conversations with NGT, the appointed Delivery Partner (contractor) will undertake all necessary preparatory surveys, mitigation and enabling works in order to allow NGT's contractors to commence works regarding the diversion, protection and removal of NGT's assets. NGT consider that this matter can be agreed separately between the parties.	2.1.16	the CoCP, "*National Highways is responsible for the delivery of the Project and its implementation However, National Highways will appoint Contractors and agents to implement the Project*" As per conversations with NGT, the appointed Delivery Partner (contractor) will undertake all necessary preparatory surveys, mitigation and enabling works in order to allow NGT's contractors to commence works regarding the diversion, protection and removal of NGT's assets. This matter is to be agreed separately between the parties. Link APP-336
5	**DCO Provisions and CPO/GVDs**	Ensuring DCO and related CPO powers are on satisfactory terms to enable the carrying out of the Proposed Diversions and the subsequent maintenance etc. of operational apparatus.	Ongoing engagement with the Applicant.	Considerable progress has already been made through discussions with LTC. NGT therefore anticipate this will reach a satisfactory conclusion.	2.1.1 & 2.1.18	The Applicant is pleased that NGT consider that these matters will reach a satisfactory conclusion, and should any matters arise that are of concern to NGT, these will be dealt with and addressed through the existing engagement channels. Is there anything specific for the Applicant to address at the moment?
6	**Rights for Pipeline Decommissioning**	NGT intends to remove any decommissioned sections of pipeline and associated apparatus. NGT requires the Applicant to provide adequate land, rights and consents to do so.	NGT requires confirmation from the Applicant that works to remove the decommissioned gas pipelines and associated apparatus have been appropriately assessed in the Environmental Statement and, where necessary, that additional land rights will be sought by the Applicant to enable the removal to take place.	NGT consider that this matter can be addressed subject to the Applicant providing the confirmation suggested and this being secured in the DCO. This is still being discussed.	2.1.17	The Project appreciates that there are two options with regards to the treatment of pipelines which are being decommissioned; Option 1 being the decommissioning and removal of the pipeline, and option 2 being the decommissioning of the pipeline, retained in situ and capped or filled with a cementitious grout. The Project requires that with respect to Feeder Main 18, that the parts of the

						pipeline in plots 4-54 and 11-55 as per the land plans shown at AS-008? is decommissioned and retained in situ. This land is to permanently acquired by the Project and the removal of the pipe could be detrimental to the intended use of the land. With respect to Feeder Main 5, the Project has no in principle objection to the decommissioning and removal of those parts of the pipeline made redundant by the undertaking of the works numbers G2 and G4. The works to remove the decommissioned pipelines have been assessed as part of the ES as communicated in APP-337. The Project considers that sufficient land rights and powers are contained within the DCO and there is no reason to acquire additional rights to enable NGT to remove the decommissioned parts of the pipeline.