

**From:** [REDACTED]  
**To:** [Lower Thames Crossing](#)  
**Cc:** [REDACTED]  
**Subject:** Principle Areas of Disagreement (PADS) - National Grid Electricity Transmission Plc  
**Date:** 10 March 2023 18:03:16  
**Attachments:** [image004.jpg](#)  
[image007.png](#)

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Dear Sir/Madam

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

Kind Regards

Vicky

No.	Principle issue in question	NGET Concern	NGET Proposed Resolution	The likelihood of the concern being addressed during the Examination stage	SoCG Reference	LTC Comment
1.	<b>Property at Heath Road</b>	NGET requires adequate rights to access private land.	A temporary licence is required to access the garden of the property (222 Heath Road) to dismantle an existing span of the YYJ route (YYJ117 to YYJ118).	Discussions have already been undertaken with the Applicant regarding requirements. NGET consider that this matter can be addressed subject to the Applicant providing the confirmation and assurances.	2.1.6	The properties are 'bordered' by the Order Limits and are owned by National Highways. A temporary licence is required to access the garden of the property (222 Heath Road) to dismantle an existing span of the YYJ route (YYJ117 to YYJ118). The Project determined to manage via this manner oppose to extending the Order Limits for this purpose – discussions have already been undertaken with National Highways regarding the requirements of NGET. National Highways will facilitate

						access by way of a voluntary agreement which will be separately agreed between the parties.
2.	<b>Rights of Way</b>	Proposed Non-Motorised Right of way is too close to pylons 4YN46B & ZB26R	Right of way needs to be realigned within the existing LoD.	NGET consider that this matter can be addressed subject to the Applicant providing the confirmation that realignment has been designed.	2.1.7	<p>This can be realigned within existing Limits of Deviation.</p> <p>Realignment to be considered as part of the detailed design coordination.</p> <p>This matter is to be separately agreed between the parties.</p>
3.	<b>Phasing of Works and Division of Responsibility</b>	Whilst the Applicant has stated to NGET that it is the Applicant who will be responsible for delivering mitigation and enabling works to allow NGET to undertake diversionary works, this is currently unclear in the application documents	Confirmation that the Applicant and/or its main delivery partner will undertake all necessary preparatory surveys (including ecological/trees/hedgerows/archaeological), mitigation and enabling works (including tree removal, accesses, haul roads, compounds and fencing) in order to allow NGET's contractors to commence works in respect of the Proposed Diversions in accordance with agreed programmes.	NGET considered that this matter can be addressed subject to the Applicant providing the confirmation suggested.	2.1.8 & 2.1.9	<p>The DCO, as drafted, makes National Highways solely responsible for the discharge of Requirements and other obligations as regards the conduct of the works. Where responsibility for the provision of certain works is subsequently transferred to a third party (e.g. a utility in respect of significant works to their infrastructure), the division of responsibility for the discharge of such obligations as between National Highways and that third party would be determined on a contractual basis between them.</p> <p>National Highways to be responsible for undertaking all ecological,</p>

						<p>archaeological and landscape (trees and hedgerow) mitigation works in with the Environmental Impact Assessment (EIA) in order to allow NGET to undertake its diversions.</p> <p>This information is included within the application documents.</p> <p>Once the NGET route has been finalised, there is a pre-commencement requirement in Sch2 7. Protected Species, which requires a final pre-construction survey. All of the relevant updated ecological reports will be issued in advance of construction phase.</p> <p>This matter is to be separately agreed between the parties.</p>
4.	<b>Interface Agreement &amp; Network Interface Management</b>	<p>NGET to manage interface relationship on behalf of the Applicant between NGET and Other Parties within infrastructure under the operation and ownership of NGET such as substations inside and outside of the Order Limits,</p>	<p>The Applicant will work with NGET and the associated Other Parties to ensure these instances are reflected within the Project Construction Programme and facilitate the necessary engagement between those parties</p>	<p>NGET considered that this matter can be addressed subject to the Applicant providing the confirmation suggested.</p>	2.1.11 & 2.1.12	<p>National Highways will work with NGET and the associated Other Parties to ensure these instances are reflected within the Project Construction Programme and facilitate the necessary conversations between those parties.</p> <p>NGET (as the Transmission Systems Operator)</p>

		<p>where works are required associated with the works for the delivery of the Project. NGET (as the Transmission Systems Operator) to manage the operational network interface regarding outages, protection works or working in general (with the relevant Distribution Network Operators) on behalf of National Highways.</p>				<p>to manage the operational network interface regarding outages, protection works or working in general (with the relevant Distribution Network Operators) on behalf of National Highways.</p> <p>This matter is to be separately agreed between the parties.</p>
5.	<b>4YN049AT Phasing of works in proximity to the Project's retaining wall</b>	<p>Phasing issue. Retaining wall would be built after the NGET temporary diversion has been removed. Query regarding whether NGET works will be completed prior to the Project works commencing.</p>	<p>To be managed and agreed with the Contractor. Optioneering report "20_18137_167_A 4YN049AT Option Assessment Report" details 3 possible options for the delivery of the pylon.</p> <p>The Contractor is to ensure during the development of the detailed design and main works planning that one of the 3 options are exercised and the conclusions of the report are adhered to.</p>	<p>NGET considered that this matter can be addressed subject to the Applicant providing the confirmation suggested.</p>	2.1.18	<p>To be managed and agreed with the Contractor. Optioneering report "20_18137_167_A 4YN049AT Option Assessment Report" details 3 possible options for the delivery of the pylon.</p> <p>The Contractor is to ensure during the development of the detailed design and main works planning that one of the 3 options are exercised and the conclusions of the report are adhered to.</p> <p>This matter is to be separately agreed between</p>

						the parties.
6.	<b>4YN046B &amp; ZB026R – NMU Route Proposals</b>	Proposal conflicts with NGET works on plans. Non-Motorised Rights of Way are within the Limits of Deviation	Non-Motorised Rights of Way will be designed by the Contractor in agreement with NGET, prior to the commencement of the relevant Works.	NGET considered that this matter can be addressed subject to the Applicant providing the confirmation suggested.	2.1.19	Non-Motorised Rights of Way are within the Limits of Deviation and will be designed by the Contractor in agreement with NGET, prior to the commencement of the relevant Works.  This matter is set to be separately agreed between the parties.
7.	<b>Flood Compensation Areas Proposals</b>	Proposal conflicts with NGET works on plans	National Highways is to liaise with and agree the proposed FCA areas and seek agreement with NGET that their requirements for construction, operation and maintenance have been accommodated prior to the commencement of the relevant Works.	NGET considered that this matter can be addressed subject to the Applicant providing the confirmation suggested.	2.1.20	National Highways is to liaise with and agree the proposed FCA areas and seek agreement with NGET that their requirements for construction, operation and maintenance have been accommodated prior to the commencement of the relevant Works.  This matter is set to be separately agreed between the parties.
8.	<b>ZB019R – retaining wall and ditch proposals</b>	Proposal conflicts with NGET works on plans	At the detailed design stage, the Contractor is to liaise with NGET, and obtain agreement that the proposals are acceptable with regards to the requirements of NGET and their pylon, ZB019R	NGET considered that this matter can be addressed subject to the Applicant providing the confirmation suggested.	2.1.21	The location of the ditch and retaining wall have been moved to reflect the new location of tower base ZB019R including an area around the base of the tower required by NGET for maintenance operations.  At the detailed design stage, the Contractor is to liaise with NGET, and obtain

						<p>agreement that the proposals are acceptable with regards to the requirements of NGET and their pylon, ZB019R.</p> <p>This matter is set to be separately agreed between the parties.</p>
9.	<b>Multi Utility Proposals (ZJ11A, ZJ11B and ZJ14R; ZB019R, ZB019T and ZB021R; YYJ119R, YYJ119T and YYJ117R are not acceptable in conjunction with the Multi Utility Corridor)</b>	Proposals conflict with NGET works on plans	The Contractor will agree with NGET the detailed alignment within the Multi-Utility Corridor for each of the following new pylons comprising part of the National Grid Works: ZJ11A, ZJ11B, ZJ14R, ZB019R, ZB019T, ZB021R, YYJ119R, YYJ119T and YYJ117R and ensure that the design and siting of all other utilities and infrastructure within the Multi-Utility Corridor takes account of the detailed alignment agreed with NGET.	NGET considered that this matter can be addressed subject to the Applicant providing the confirmation suggested.	2.1.22	<p>The Contractor will agree with NGET the detailed alignment within the Multi-Utility Corridor for each of the following new pylons comprising part of the National Grid Works: ZJ11A, ZJ11B, ZJ14R, ZB019R, ZB019T, ZB021R, YYJ119R, YYJ119T and YYJ117R and ensure that the design and siting of all other utilities and infrastructure within the Multi-Utility Corridor takes account of the detailed alignment agreed with NGET.</p> <p>This matter is set to be separately agreed between the parties.</p>
10.	<b>Haul Road Proposals (ZB017, ZB019/019R, YYJ116R, ZB023, ZB030, ZB033, ZB027, ZB017, ZB014, ZJ014, ZJ012 and ZJ011A)</b>	Proposals conflict with NGET works on plans	The Haul Roads will be considered and developed by the Contractor at the Detailed Design stage in conjunction with the DCO and the requirements of NGET	NGET considered that this matter can be addressed subject to the Applicant providing the confirmation suggested.	2.1.23	<p>The Haul Roads will be considered and developed by the Contractor at the Detailed Design stage in conjunction with the DCO and the requirements of NGET.</p> <p>This matter is set to be separately agreed between the parties.</p>
11.	<b>Design</b>	Access road	The Applicant agrees that no	NGET	2.1.24	National Highways

		(Thong Lane to attenuation pond) clash between tower 4YN046A	part of the access road will be constructed within 15m from the foundations of any part of NGET's Apparatus without NGET's prior written approval	considered that this matter can be addressed subject to the Applicant providing the confirmation suggested.		and NGET agrees that no part of the access road will be constructed within 15m from the foundations of any part of NGET's Apparatus without NGET's prior written approval. This matter is set to be separately agreed between the parties.
12.	<b>Design</b>	Overbridge works do not currently accommodate access for 250 tonne cranes.	In the eventuality the FP136 overbridge is not designed to accommodate the access requirements of NGET it will leave parts of the network inaccessible. The Applicant to provide suitable access in this scenario	NGET considered that this matter can be addressed subject to the Applicant providing the confirmation suggested.	2.1.27	National Highways & NGET agree that this issue is resolved, however in the eventuality the FP136 overbridge is not designed to accommodate the access requirements of NGET it will leave parts of the network inaccessible. For the protection against this scenario, this matter is to be separately agreed between the parties.
13.	<b>Lighting Columns</b>	Clearance concerns with proposed lighting columns	<p>The Applicant to install reduced height lighting columns at all points where a lighting column is proposed in line with NGET's clearances and maintenance requirements.</p> <p>NGET require further information to be provided for their assurance at the detailed design stage. Currently the lighting columns are represented within the General Arrangement drawings as 'pink dots' and no further information for assessment has been obtained.</p>	NGET considered that this matter can be addressed subject to the Applicant providing the confirmation suggested and subject to suitable form of Protective Provisions	2.1.30	National Highways and NGET believe this topic to be part of the Protective Provisions however NGET require further information to be provided for their assurance at the detailed design stage. Currently the lighting columns are represented within the General Arrangement drawings as 'pink dots' and no further information for

						<p>assessment has been obtained.</p> <p>The Contractor is to liaise with and seek agreement from NGET that the columns to be installed, in proximity to their assets, do not present any safety concerns.</p> <p>This matter is set to be separately agreed between the parties.</p>
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