

GBC Comments on documents submitted at deadline 5

<i>Referencing</i>	<i>Current</i>	<i>Amendment</i>	<i>Explanation / comments</i>
REP5-025 National Highways Deadline 5 Submission - 3.1 Draft Development Consent Order v7.0 (Tracked Changes)		No changes arising on amendments made to draft dDCO between version 6 and version 7	
REP5-049 National Highways Deadline 5 Submission - 6.3 ES Appx 2.2 - Code of Construction Practice, First iteration of Environmental Management Plan v5.0 (Tracked Changes)		See GBC's response to ExQ 2 question Q16.1.4 And Document "Possible Amendments to REAC REP5-048"	
REP5-055 National Highways Deadline 5 Submission - 7.13 Framework Construction Travel Plan v3.0 (Tracked Changes)	Sections on: 10.4 Remedial measures 10.5 Funding		GBC in its s106 asks (AS-070) highlighted the potential for a range of measures that could require funding Many of these could be remedial measures but GBC not confident that they will be given due consideration as, for example, we did suggest changes to Table 2.3 Stakeholder considerations in 'Outline Traffic Management Plan for Construction at deadline 4 via "Response to ExA Action Point 7 from ISH4 (Traffic and Transportation)" (REP4-298), but none of been included in revision (REP5-057) - see further comments below

	<p>C.3 Membership</p> <p>C.3.1 Membership of the TPLG would be by invitation and comprise:</p> <ul style="list-style-type: none"> a. Representatives from National Highways b. Travel Plan Manager (TPM) c. Stakeholder representatives (such as public transport operators, TfL and local highway authorities) d. Travel Plan Coordinators (TPCs), who would be invited to attend as necessary to discuss site-specific issues e. Other relevant groups as considered appropriate and agreed by the TPM <p>C.3.2 Any changes to the TPLG membership would need to be approved unanimously by TPLG members</p>	<p>C.3 Membership</p> <p>C.3.1 Membership of the TPLG would be by invitation and comprise:</p> <ul style="list-style-type: none"> a. Representatives from National Highways b. Travel Plan Manager (TPM) c. Stakeholder representatives (such as public transport operators, TfL, local highway and local planning authorities) d. Travel Plan Coordinators (TPCs), who would be invited to attend as necessary to discuss site-specific issues e. Other relevant groups as considered appropriate and agreed by the TPM <p>C.3.2 Any changes to the TPLG membership would need to be approved unanimously by TPLG members</p>	<p>GBC considers that local planning authorities should be explicitly listed (i.e. GBC + TMBC) rather than potentially having to be picked up under bullet e. Other relevant groups as considered appropriate and agreed by the TPM</p>
	<p>C.4.15 The FCTP and future SSTPs are designed to incorporate the flexibility needed to respond and adapt to changing conditions over the duration of the construction of the Project and will require a</p>		<p>The undertaking of regular employee travel surveys is welcomed by GBC</p>

	continuous monitoring and reviewing process. Regular employee travel surveys would be undertaken at each site, reviewing targets and indicators as necessary.		
REP5-055 National Highways Deadline 5 Submission - 7.13 Framework Construction Travel Plan v3.0 (Tracked Changes)	C.4.17 In the event of the FCTP and the SSTP targets not being met, the TPLG would agree whether the shortfall is significant. Significance would be determined by whether the failure to meet a target results in a demonstrable impact. If the degree of shortfall is considered to be significant, the TPM, along with National Highways and the relevant TPC, would formulate a package of remedial measures designed to address the shortfall in relation to the initial targets set out in the SSTPs and include a timescale over which the success of these measures should be reviewed.		Highlights importance of GBC being involved with setting SSTP targets. What is meant by “demonstratable impact”?
	Reimbursement of costs/expenses of TPLG members C.4.21 The TPLG would not reimburse costs or expenses (other than costs incurred in booking meeting venues/facilities, etc.) other than in accordance with the terms of a Section 106 agreement or in in		Assume officer time costs covered under a post to be funded by NH via officer support contributions i.e. project manager S106 has not been agreed with GBC

	exceptional circumstances, with prior agreement of the TPM.		
REP5-057 National Highways Deadline 5 Submission - 7.14 Outline Traffic Management Plan for Construction v5.0 (Tracked Changes)	Table 2.3 Stakeholder considerations		We did suggest changes to Table 2.3 Stakeholder considerations in 'Outline Traffic Management Plan for Construction' at deadline 4 via "Response to ExA Action Point 7 from ISH4 (Traffic and Transportation)" (REP4-298) NH's deadline 5 amendments to OTMP do not include any amendments to table 2.3 which is disappointing
REP5-082 National Highways Deadline 5 Submission - 9.111 Actions from the Accompanied Site Inspections	1B Confirm the height of the highest part of the A2/M2/LTC junction (LTC southbound to A2 westbound viaduct) relative to existing adjacent features.		Noted but does not provide 3D understanding needed to truly understand impacts
	1C Provide figure and references for location of the Shorne Ifield Road Utility Logistics Hub (ULH)		Noted but scale of compounding concerning