

<u>Section</u>	<u>Owner</u>	<u>Comment</u>	<u>HS2 Response to comment</u>	<u>LA comments on third draft of CoCP</u>	Proposed alternative wording (if appropriate)
<u>Section</u>	<u>Comments from</u>	<u>Stakeholder comments (pre-July 2015)</u>	<u>HS2 Response to comment (July 2015)</u>	<u>Stakeholder comments on third draft of CoCP (December 2015)</u>	<u>Proposed alternative wording (if appropriate)</u>
N/A - Legal responsibility	NEF	We advise that the Code of Construction Practice (CoCP, November 2013) clarifies the chain of responsibility between HS2 Ltd, the nominated undertaker and contractors. We also advise that the mechanism for approval and sign off of site-specific management plans for identified environmentally sensitive worksites is set out and made clear	Paragraph to be added to Section 2 to highlight what site specific management plans are, with the LEMPs to go into more detail.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
N/A - Engagement with Natural Englands	NEF	We advise that the CoCP clarifies what Natural England's engagement might be regarding consultation/agreement/sign-off for ecological and landscape issues.	The CoCP identifies the EMR as the vehicle for Natural England's engagement in the process, unnecessary to repeat this wording the the CoCP.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
N/A - suggest text is added to the ecology and landscape sections	NEF	The Draft Environmental Memorandum (November 2013) states that as part of the Local Environmental Management Plan (LEMP) for environmentally sensitive worksites, the nominated undertaker will prepare "site-specific management plans focusing on mitigation, compensation and monitoring requirements and opportunities for enhancement" (para 5.1.3). The CoCP does not currently refer to enhancement opportunities, nor does the Annex 3 LEMP template. To ensure this thread from the Environmental Memorandum is not lost, we advise that the ecology and landscape and visual chapters of the CoCP should include some advice on seeking opportunities for enhancement.	Not for CoCP - to be covered in LEMPs and or Site Specific Management Plans as detailed in the Environmental Memorandum.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
N/A - suggest text is added	NEF	We advise that some thought needs to be given as to how the CoCP and LEMPs will draw on the design specification, with the text in the CoCP and associated Annex 3 LEMP template amended accordingly.	No change needed as LEMPs and CoCP will not cover design aspects	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
N/A - suggest text is added	NEF	The CoCP Figure 1 table p4 finishes at construction, with S12 para 12.4.1 Landscape & Visual explaining that during this period contractors will "implement appropriate inspection, monitoring and maintenance of landscape and planting and seeding works". We understand from this that the contractors who have implemented the work will initially maintain it for a specified period, but are unclear whether they will be contracted for longer term maintenance. We would welcome clarification on this, including how any handover would be managed, and for the CoCP to reference it. We would be happy to discuss this.	Reference added to Section 12.4.1 - Amendment to CoCP made	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
2. Purpose of the CoCP					
2.1.3	NEF	We welcome that guidance will be considered from industry best practice guidance documents, over and above the minimum legal requirements.	Note only - no change to CoCP needed	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
2.1.4	NEF (Env. Agency)	The CoCP will need to be updated on the back of all ES documentation including any supplementary ES produced to support Additional Provisions etc – it needs to be constantly referred back to and updated periodically.	Note only - no change to CoCP needed	Suggest that this commitment should be stated.	
3. Policy and Env. Mngt Principles					
3.1.1	NEF (Env. Agency)	Suggested additional text - All contractors will be contractually required to comply with the requirements of the sustainability policy.	Not a necessary change for the CoCP	Suggest that this commitment should be stated as per CrossRail or is this not the case with HS2? Why no change? Is it stated elsewhere or is it not the case?	
3.2.3	NEF	Happy for Forestry Commission to be cited here (in relation to tree and woodland issues), but realise that 'such as' could cover our involvement.	No update needed for the CoCP	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
3.4.5	LBC	NEW COMMENT FROM LA 's - DECEMBER 2015 Can the reports be made available? Discussion with LA to remedy any non-compliance?		Needs to reflect commitment to share monitoring information on an annual basis and on amore frequent basis with local communitites through the working groups. Can the detail of this be set out in the LEMP?	
4. Implementation					

4.1.1-2 Enforcement	Planning Forum	Ambiguity around the enforcement of the CoCP and related plans such as the LEMPs - arrangements for implementation and enforcement should be set out more clearly. Responsibilities must be cascaded to subcontractors.	CoCP is a high level document, as part of the Bill Submission as part of the Environmental Minimum Requirements (EMRs). The CoCP sets out in Section 4 the general principles of enforcement. Section 3.4 provides further detail on how management arrangement monitoring and cascading to contractors (3.4.4) Section 4.1.3 and 4.2 states that LEMPs will be produced which will include more specific measures by environmental topics. Furthermore, hen LEMPs are cascaded to the Lead Contractors, they will produce their own Environmental Management Plans which will go into responsibilities / mitigation meaures in more detail than the CoCP / LEMPs. Section 4.1.4 states that the EMS will ensure compliance with the CoCP, including the LEMPs.	The CoCP should specify how compliance with the provisons conatined within it will be enforced. The EMS cannot be relied upon to ensure compliance. The CROSSRAIL Constuction Code does not contain any reference to enforcement and is more generic. By contrast The TTT CoCP is quite prescriptive and relies on Part B site specific requirements. Will the LPAs be able to add such site specific requirements at the Section 16 stage? Concern that enforcement via breech of contracts could be lengthy and not allow for an immediate response. Should reflect that the LPA will have planning enforcement powers available to them in relation to some matters. Also, would it be helpful to have reference to other legislation that could be used/ the LA will be responsible for.	ammendment "appropriate action will be taken by tge nominated undertaker "or enforcing authority" as required to ensure compliance
4.1	Planning Forum	Concerns about the lack of independent regulation or clear procedures in place - proposals should include independent scrutiny, and arbitration in the event of dispute.	CoCP is an EMR which forms part of the Hybrid Bill submission. Complaints Commissioner is place with enforcement through the EMRs.	The CoCP is in itself an EMR and should not rely on other EMRs. This introduces an infinite loop into the enforcement process. The complaints commisioner has no enforcement powers rather mediation and arbitration in the second instance. Also, from discussions to date there does not appear to be a complaints commissionner - the residents commissioner appears to be dealing with property compensation only. Need to be clear when this will be established and what their remit will be. Also, not sure how this helps with solving the problem at source - complaints commissioner will not be responsible for implementation, compliance or monitoring. Essentially, it will be a backstop if these things fail and someone's complaints are not adressed - it will be up to the individual to persue this. If there are a number of similar complaints how will this be dealt with? Will they be passed on to the complaints commissioner? Will the complaints commissioner receive and analyse the monitoring and complaints data? Also, breaches may not result in complaints - does this mean that they should not be addressed?	
4.1	Planning Forum	Should also include best practice from the London Olympics and TTT. The Olympic Delivery Authority CoCP is specific about roles, responsibilities and enforcement. When and where will this be set out for HS2 is not clear. The enforcement mechanism does not give confidence as there appears to be no independent regulation or enforcement procedure. Instead the document relies on self-regulation by the Nominated Undertaker (NU). The EMS should include independent scrutiny, and arbitration in the event of dispute. The ODA CoCP was designed for an area which benefited from regeneration of a 500 acre site near Stratford on the eastern side of London. It is not ideally suited to a linear development between London and Birmingham passing through undeveloped land in the AONB and so needs to be adopted and developed to reflect this.	Not for CoCP revision. Best Practice from other large projects may feed into the LEMPs.	Noted. Can there be a commitment that other best practice will be looked at?	
4.1	Planning Forum	Local Authorities or independent assessors should be properly resourced to undertake any compliance monitoring and enforcement activity where required.	Not a CoCP issue to be included	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
4.1.4	Planning Forum	NEW COMMENT FROM LA 's - DECEMBER 2015 A programme of audit and monitoring must be implemented to ensure compliance. Audit of the environmental mitigation set out in the CoCP must be undertaken by independent auditors on a regular basis which is discussed and agreed with stakeholders. Results must be fed back into the CoCP to provide continuous feedback to the CoCP and LEMPs over the duration of the project. The CoCP and LEMPs should be continuously informed by appropriate ecological survey over the duration of the project to take account of the temporal and spatial variations in ecological receptors. A schedule of when updated ecological survey information is required should be provided to, and agreed upon with the LA.		This should be linked to the assurance received that monitoring data would be shared on a regular basis. Could detail be set out in the LEMPs?	

4.2	Planning Forum	Concerns about level of involvement and timing of involvement - LPAs and Highway authorities should feed into and agree LEMPs and there should be an opportunity for wider consultation with and input from communities and local groups. Methods and timings for this need to be clearly set out and agreed.	First revision drafts of LEMPs to be sent to LA's prior to appearance in Select Committee, comments will be collated from all LA's before 2nd revisions are re-issued and meetings with each LA will be held to discuss their respective comments on their LEMP. The Information Paper IP G2 has been updated to reflect community engagement: <i>The nominated undertaker and/or its contractors will engage with the local communities in order to develop the LEMPs, once the detailed design and construction planning has been completed, which is not expected to be before Royal Assent, and HS2 is nearer the start of construction.</i>	Noted. Can there be a commitment to this in the CoCP? At very least need to ensure that the ommitment from IP G2 has made it into the register of underakings. Should include reference to undertakings.	
4.2	Planning Forum	The geographical scope of LEMPs should be extended where relevant, e.g. where transport issues are likely to have implications beyond CFAs.	LEMPs are as per LA boundaries, as opposed to CFA boundaries which are detailed within the ES. Where environmental topics impact more than one LA, the aspect will be duplicated across all the LEMPs and issued to the relevant LA for comment.	This is not the case. Three Rivers, and SBDC have combined LEMPs. Here the boundary has been extended for mutual benefit.	
4.2	Planning Forum	The LEMP (amongst other things) should have sufficient regard to the uniqueness of green spaces in an urban environment.	The LEMPs mirror the topic headings as those set out in the CoCP and so Landscape and Visual, Ecology and Agriculture, Forestry and Soils topics in relation to green spaces in the urban environments are detailed. Protection of green spaces are considered in the ecology and landscape sections of the LEMPs.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
4.2	Planning Forum	There should also be opportunities to review and adjust layout and working methods if necessary, i.e. when problems arise during works.	This will be covered within site specific contractor documents such as their own Environmental Management Plans which will be produced at construction stage. These will be cascaded down to subcontractors as and when necessary. BPM will be required at all times and so methodologies and mitigation measures will need to be adaptable where practicable.	Can this information be made publically available? Is there a commitment to review?	
4.3	Planning Forum	All contractors (including sub-contractors) should sign up to the Considerate Contractors Scheme, or all sites (covering all activities on it) should be registered.	Lead Contractors will be responsible for signing up to the Considerate Constructors Scheme. It is not practicable to ask all sub-contractors to sign up. However, they will be required by the contractors to comply with the necessary measures.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
4.3	Planning Forum	All to achieve an agreed minimum standard. Methodology should be included for assessment/mitigation and LAs should be advised of corrective actions taken.	Minimum standard for the CCS is yet to be agreed, if that approach is going to be taken. Contractors will have their own Environmental Management Plan which work on the detail within the LEMPs to be more detailed / contain site specific mitigation measures. Not agreed that LA's should be involved in corrective actions.	Regular reports should be shared with the community and local authority. Dificult to understand why not willing to share details of corrective action with LA, especially in the likely scenario where they are dealing with a complaint from the public. Link back to undertaking to share monitoring info.	
4.4.2	Planning Forum	Necessary for the Nominated Undertaker to monitor the cumulative impact of works if more than one lead contractor is working in an area.	Draft CoCP clause 4.4.2 requires contractors to consider cumulative impacts of their works within method statements (for HS2 associated works only). Amended 4.4.2	Suggest that wording is amended to read 'and will set out the measures required to reduce the cumulative effects of concurrent construction activities and sites.' Useful wording in NLE which refers to regular meetings/liasion with nearby construction sites.	
4.3.1	Planning Forum	What would happen if monitoring uncovered that mitigation had not been successful? For how long will monitoring take place?	Section 4.3.2 refers to corrective actions required	4.3.1 Should reference the LAs as well as NEF.	
4.4	Planning Forum	The CoCP should be amended to include LAs' visibility of the contractors Construction Environmental Management Plans (as in the Thames Tideway Tunnel CoCP), to help ensure compliance with the controls put in place to manage and minimise impacts.	Not for the CoCP to detail the LA's visibility of the contractors Construction Environmental Management Plans	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
4.5	Planning Forum	Sufficient suitably qualified and experienced personal must be appointed to supervise all construction works not just the main construction works - or more information should be provided on what are considered the 'main' construction works.	Main construction works are assumed to be those covered by the powers in the hybrid Bill and requirements of the EMRs, including the CoCP.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
4.5	Planning Forum	The nominated undertaker should approve the appointment of environmental supervisors, and their reports should be made publicly available.	The NU or its representative will approve CVs of key staff such as environmental supervisors / managers. Do not agree re reports being made publicly available.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
5. General					

5.1.1	Planning Forum	Involvement in producing framework for community relations / input into drafts.	Title to be changed to 'Community Engagement Framework'. Likely that draft will be circulated around for comment.	Needs to reflect undertakings.	
5.1.1	Planning Forum	Business should be considered more in 'community' framework but also local special interest groups.	Noted - no change for CoCP	TTT 3.1.6 Appropriate meetings will be held with residents (or their representatives), businesses and other local occupiers to keep them informed about the works and to provide a forum for them to express their views. The relevant planning authority will be invited to participate. The participants, frequency and chair of the meetings will be determined in liaison with the employer and the local authority. The principal function of the meeting would be to discuss ongoing and planned construction and communication activities. The meeting would also seek the views of the group on the effectiveness of the project's community liaison activities and endeavour to make improvements where appropriate. Can this be covered in the LEMPs	See TTT
5.1.1	Planning Forum	Stronger commitment needed to local employment.	Not for Stakeholder Engagement Framework	5.1.3 includes reference to the NU and its contractor considering local employment, apprenticeships and educational initiatives when recruiting staff - strengthen this commitment and set targets - either here or elsewhere?	
5.1.1	Planning Forum	'Reasonable steps' is vague and gives no confidence that there will be satisfactory community engagement.	Detail of engagement will be detailed in the draft engagement framework	See TTT part 3 and CROSSRAIL CC Part 2.6 Will be presented to the Planning Forum for comment. Needs to reflect undertakings	
5.1.1	Planning Forum	Engagement should include interest groups such as ramblers, heritage societies, PRoW user groups and wildlife groups.	Will be covered under the HS2 Engagement Strategy, however the Framework is likely to just be engagement with the communities	See TTT part 3 and CROSSRAIL CC Part 2.6 Will be presented to the Planning Forum for comment. Needs to reflect undertakings	
5.1.1	Planning Forum	Community relations personnel should remain in this position post-construction to assist communities that have been adversely impacted by the line.	Discussion around Stakeholder Engagement Framework being held at the moment	See TTT part 3 and CROSSRAIL CC Part 2.6 Will be presented to the Planning Forum for comment. Needs to reflect undertakings	
5.1.1	Planning Forum	It will be essential that HS2 Ltd learns lessons from the Crossrail development. In the GLA's report, "Light at the end of the Tunnel", it was highlighted that, "an effective dialogue between Crossrail and affected businesses was not established early enough in the process." A key recommendation of the report was that a dedicated point of contact should be made available to businesses as well as one-to-one support for each affected business.	Lessons learned from other projects are being taken into consideration for the draft Stakeholder Engagement Framework	See TTT part 3 and CROSSRAIL CC Part 2.6 Will be presented to the Planning Forum for comment. Needs to reflect undertakings	
5.1.1	Planning Forum	Registers of vulnerable residents should be maintained and updated by HS2 so as to identify those households who would require immediate support in the event of a utilities failure.	Likely to be held with the Community Relations teams	See TTT part 3 and CROSSRAIL CC Part 2.6 Can this be covered in the LEMPs and set out in the Community Engagement Strategy?	
5.1.1	Planning Forum	The equalities impact assessment would form the basis from which HS2 would plan mitigating the community impacts of construction.	Discussion around Stakeholder Engagement Framework being held at the moment	See TTT part 3 and CROSSRAIL CC Part 2.6 Will be presented to the Planning Forum for comment. Needs to reflect undertakings	

5.1.4	Planning Forum	There is still no indication of clear time-lines for giving notice but only a vague reference to “discussions of forthcoming works during regular community forum meetings” with no indication of how far in advance of the works these discussions will be. There should be a code setting out minimum notice periods.	Discussion around Stakeholder Engagement Framework being held at the moment	See TTT part 3 and CROSSRAIL CC Part 2.6 Will be presented to the Planning Forum for comment. Needs to reflect undertakings	
5.1.4	Planning Forum	The NU’s means of communication should be capable of interfacing with LA systems, as the Local Authorities are often the first point of contact for the public.	Discussion around Stakeholder Engagement Framework being held at the moment	Delivery timeline? With who? Will be presented to the Planning Forum for comment. Needs to reflect undertakings	
5.1.4	Planning Forum	We expect the main construction sites to operate a community liaison team to enable dialogue to take place on construction related matters between the communities, local authorities and HS2. We recommend that a community liaison code of practice is produced for agreement that will identify how and when HS2 Ltd will provide key information to communities during the construction phase.	Discussion around Stakeholder Engagement Framework being held at the moment	Delivery timeline? Refence to schools and other community facilities. Can we have a commitment that the LEMPwill make special provision for schools - or wherever relevant place to put this is?	
5.1.6	Planning Forum	With regard to CoCP being produced in different languages, LAs need clarity on what case-by-case basis means? HS2 Ltd should have a plan for scenarios where customers don’t speak English or have other special needs.	CoCP will not be produced in different languages, but information sheets / bulletins will be Likely to be held with the Community Relations teams	See TTT part 3 and CROSSRAIL CC Part 2.6 Will be presented to the Planning Forum for comment. Needs to reflect undertakings	
5.1.6	Planning Forum	LA’s do not want this to be a 24hr messaging service – needs to have personnel and contractors who would be able to go out and resolve urgent issues that arise out of hours.	Discussion around Stakeholder Engagement Framework being held at the moment	See TTT part 3 and CROSSRAIL CC Part 2.6 Will be presented to the Planning Forum for comment. Needs to reflect undertakings	
5.1.6	Planning Forum	A process for handling enquiries should mirror that for handling complaints so that there is a timeframe in place for answering them and LA’s want to agree acceptable KPI’s.	Discussion around Stakeholder Engagement Framework being held at the moment	See TTT part 3 and CROSSRAIL CC Part 2.6 Will be presented to the Planning Forum for comment. Needs to reflect undertakings	
5.1.6	Planning Forum	What is the escalation process if there are serious complaints or a person feels a complaint has not been dealt with effectively.	Discussion around Stakeholder Engagement Framework being held at the moment	See TTT part 3 and CROSSRAIL CC Part 2.6 Will be presented to the Planning Forum for comment. Needs to reflect undertakings	
5.1.8	Planning Forum	The threshold for when the CC is brought into the process is not stated. What resolutions / actions would be available to them?	Discussion around Stakeholder Engagement Framework being held at the moment	See TTT part 3 and CROSSRAIL CC Part 2.6 Will be presented to the Planning Forum for comment. Needs to reflect undertakings	
5.1.9	Planning Forum	Emergency plan should cover how they deal with any failures or losses of utilities (including planned).	Discussion around Stakeholder Engagement Framework being held at the moment	See TTT part 3 and CROSSRAIL CC Part 2.6 Will be presented to the Planning Forum for comment. Needs to reflect undertakings	
5.1.9	Planning Forum	HS2 should attend/co-ordinate with Emergency Resilience Forums in County / relevant local authorities to ensure all relevant stakeholders involved.	Discussion around Stakeholder Engagement Framework being held at the moment	See TTT part 3 and CROSSRAIL CC Part 2.6 Will be presented to the Planning Forum for comment. Needs to reflect undertakings	
5.1.9	Planning Forum	Along with the plan, HS2 should have a Crisis Support Team in place to deal with emergencies and evacuations.	Discussion around Stakeholder Engagement Framework being held at the moment	See TTT part 3 and CROSSRAIL CC Part 2.6 Will be presented to the Planning Forum for comment. Needs to reflect undertakings	

5.1.10	Planning Forum	Small claims: A draft policy document is required prior to adequately commenting on this procedure.	Discussion around Stakeholder Engagement Framework being held at the moment	See TTT part 3 and CROSSRAIL CC Part 2.6 Will be presented to the Planning Forum for comment. Needs to reflect undertakings	
5.1.10	Planning Forum	Should apply to Local Authorities	Discussion around Stakeholder Engagement Framework being held at the moment	See TTT part 3 and CROSSRAIL CC Part 2.6 Will be presented to the Planning Forum for comment. Needs to reflect undertakings	
5.1.10	Planning Forum	Querying the threshold – should be higher and inflated through time.	Discussion around Stakeholder Engagement Framework being held at the moment	See TTT part 3 and CROSSRAIL CC Part 2.6 Will be presented to the Planning Forum for comment. Needs to reflect undertakings	
5.1.10	Planning Forum	Make clear that claims above the threshold will also be dealt with.	Discussion around Stakeholder Engagement Framework being held at the moment	See TTT part 3 and CROSSRAIL CC Part 2.6 Will be presented to the Planning Forum for comment. Needs to reflect undertakings	
5.1.10	Planning Forum	Does the process require a statutory Ombudsman to handle complaints from claimants who has powers to order remedies, or does this fall under the Small Claims Administrator?	Discussion around Stakeholder Engagement Framework being held at the moment	See TTT part 3 and CROSSRAIL CC Part 2.6 Will be presented to the Planning Forum for comment. Needs to reflect undertakings	
5.2.5 Start up and close down periods	Planning Forum	NEW COMMENT FROM LA'S - DECEMBER 2015		<p>Camden Council notes that the operation of plant or machinery likely to cause a disturbance will not be included within the start up and close down periods. Camden Council request a definition of “disturbance” be provided. For example - would artificial lighting be used during these times? This is likely to cause a disturbance.</p> <p>The COCP includes a number of caveats and exemptions which make it very unclear what work would be carried out outside of normal working hours. It is also unclear at what times construction vehicles may need to be managed to minimise impacts on residents / businesses and the highway network. The details concerning construction vehicles should be covered in the LEMP.</p> <p>The COCP should include that detailed discussions and agreements should be put in place about working hours in general and specifically in relation to construction traffic hours to minimise the impacts on residents / businesses/ community uses, rail passengers and the highway network. These agreements should be clearly set out in the LEMP prior to any construction commencing.</p>	
5.2.6 Additional working hours	Planning Forum	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council consider that the works noted within this paragraph to be carried out 24 hours a day, 7 days a week should be by exception and full details of the works must be submitted to and agreed by the local authority prior to works commencing. Such works are to be agreed on a case-by-case basis, with any required noise controls to minimise noise and other impacts.	
5.2.6 Additional working hours	Planning Forum	NEW COMMENT FROM LA'S - DECEMBER 2015		Will works undertaken on the railway by Network Rail outside of core hours to facilitate the HS2 project but may not be in direct relation to it, will be subject to same proposed controls as noted within the CoCP and the LEMP and will be subject to S.61 consents, in the same way as works directly linked to the HS2 project.	
5.2.8	Planning Forum	Section should require the contractor to make a special case for carrying out activities outside of core hours which are not part of the core works.	Discussion around Community Engagement Framework being held at the moment	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	

5.2.10 Repairs or maintenance of construction equipment.	Planning Forum	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council consider that this statement should be qualified with the statement “with the consent of the relevant authority”.	
5.3.1	Planning Forum	Must cover before start and after working hours. (eg the 11th bullet point refers to managing staff congregating outside of site prior to works starting for the day. A similar consideration should be made for vehicles accessing the site.)	Need to clarify this	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
5.3.1	Planning Forum	<p>Additional mitigation works – the list given by HS2 is not complete. Eg:</p> <ul style="list-style-type: none"> • Public access would be desirable on some occasions e.g. to view or participate in archaeological work. • Point 12. LA access to CCTV by trained LA officers should be arranged • Point 16. Details of work on temporarily diverted PRoW should be specified. • More needs to be said here about inspection: frequency, recording and responsibilities. • Damping etc for dust management. • Management of staff congregating outside of site prior to commencing work. • Storage of liquid and gas inflammable substance in nominal quantities in a secure and safe place. <p>• Reduction of risks to trees.</p> <p>• Reduction of soil compaction on sites/ compounds.</p> <p>• A monitoring regime for each site. (Camden Council note that this was in the previous draft and requests it is reinserted.)</p>	<p>Not sure practical for H&S reasons. Agreement likely by exception and therefore not part of CoCP</p> <p>HS2 security</p> <p>Details of work would be in the ES / LEMPs or other documents</p> <p>Covered in section 3 and 4</p> <p>Covered in AQ section</p> <p>Covered in point 11</p> <p>15.2.14 covers liquid wastes. Don't specifically cover storage of liquid and gas inflammable substances – storage in nominal quantities may be impractical - review further, include in 5.3.1?.</p> <p>Tree protection covered in 12.2</p> <p>Covered in 6.1.2</p> <p>Not clear what this means / what was previously included. The LEMPs will provide any further details on site specific monitoring over and above what is included within the CoCP.</p>	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
5.5	Planning Forum	<p>Security within the area more generally should be addressed, and not limited to work site security.</p> <p>Consultation should take place with Crime Prevention Design Advisors and “designing out crime” techniques used - INCLUDED.</p> <p>Eg:</p> <ul style="list-style-type: none"> • Natural surveillance and CCTV to be considered and enhanced through improved sight lines and lighting • Secure perimeter fencing and gating to reduce the risk of misuse of sites and buildings. • Secure scaffolding to reduce opportunities to access restricted sites and facilitate the commission of crime and disorder. • Restrict access to construction materials and plant increases risk of theft, other crime and disorder. • Remove any opportunities for unauthorised access to sites and materials through appropriate fencing, gating and locks. • Consider the use of patrolling services. • Ensure scaffolding does not facilitate access to restricted areas and properties. <p>All aspects could be addressed in the LEMPS.</p>	Generally covered in 5.5 – details could be included in LEMPs if required	Can we have a commitment to this (detail to be included in the LEMP) - reference in CoCP?	
5.6	Planning Forum	HS2's approach needs to go beyond consulting with local businesses, to commit to using hoardings to promote local business areas and to help meet other local community aspirations. Since the last consultation, there is no mention of the active promotion of local business areas.	Discussion around Stakeholder Engagement Framework being held at the moment	The COCP should include that detailed discussions and agreements should be put in place about working hours in general and specifically in relation to construction traffic hours to minimise the impacts on residents / businesses, rail passengers and the highway network. These agreements should be clearly set out in the LEMP prior to any construction commencing. Should reflect undertakings	
5.6	Planning Forum	Hoardings should play a wider role in the mitigation of the scheme to include green (planted) hoardings to help reduce air pollution for example.	Detail on hoarding not specified at this stage. To be looked at at a later date	Detail on how this will be agreed required. Should reflect undertakings	

5.6	Planning Forum	The design and location of hoardings should be subject to assessment in the local area management plans to be agreed with the Council and yet there is no mention of consultation with the Local Authority in the latest version of the CoCP. For this reason a class approval will not be appropriate for hoardings (are these counted as works screening?)	Standard hoarding of height 2.4m is used across the industry. If height required to be raised, then consultation with the Local Authority will likely be undertaken Approval as part of Schedule 16 hybrid Bill screening process	Please set this out in COCP and give firm commitment to consulting with LA if vary from the norm,.	
5.8	Planning Forum	Dialogue at the earliest opportunity should be made with the LA to seek to avoid sensitive locations	Not a CoCP issue	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
5.9	NEF (Env. Agency)	Foul drainage arrangements should also be considered here	Drainage requirements would be part of Local Authority approval process	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
5.11	Planning Forum	It is imperative that the reinstatement of sites on completion takes place as soon as possible, particularly in Green Belt Areas and some reassurance of this should be included. [The timescale for submitting a scheme for approval in the Bill is still considered unsatisfactory.]	Outside the scope of the CoCP	CoCP should nonetheless refer to relevant documents.	
5.12	Planning Forum	This must be considered in EHO Sub Group	Noted - no change for CoCP	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
5.12.1	NEF (Env. Agency)	The word prevent should be used rather than control in the 2nd line, and prevention rather than control in the 3rd line.	No change -Risk is controlled as opposed to the prevention of risk. Also, believe it should be a control plan	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
5.12.2	NEF (Env. Agency)	1st bullet - whom should the information be provided to? 3rd bullet - is a measure required here? In an hour, a day, a week, a month? Who will decide the urgency of the call?	Section 5.12.2 amended to state that measures will be adopted by the Lead Contractors Not required in CoCP - will be covered in site specific management plans.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
5.14.1	NEF (Env. Agency)	This could be picked up in relevant LEMPs, but there may be certain areas where contractors should sign up to the EAs Flood Warning Service, e.g. in known extremely flashy catchments.	Section 5.14.1 amended to include a requirement for the contractors to register with the EA's Floodline Warnings Direct Service in areas of flood risk	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
6. Agriculture, Forestry and Soils					
General	Planning Forum	References to agricultural land – the principles in relation to soil protection, reinstatement etc. should be applied to all open spaces, pastoral landscapes, and other forms of agriculture such as silviculture. (Sec 12?).	There is a statutory responsibility to restore agriculture land that is disturbed by HS2 (within planning guidance). From a sustainability perspective the conservation of soils displaced by HS2 from open spaces in built-up areas is also a reasonable expectation. The Defra document 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites' 2011, sets out the relevant guidance, which I believe covers both agriculture and undisturbed soils in urban areas.	Can we have a commitment that will adhere to this document? Also, explicit reference to open spaces? Specifics of comment not addressed. "The principles in relation to soil protection, reinstatement etc. should be applied to all open spaces, pastoral landscapes, and other forms of agriculture such as silviculture."	
6.1.1	Planning Forum	Controls should be implemented to mitigate all potential impacts, rather than just 'avoidable' impacts.	The EIA carried out by HS2 Ltd identifies all significant impacts. The EIA Scope and Methodology Report (and the Supplementary SMR) sets out the evaluation criteria for determining the magnitude, sensitivity and significance of HS2 impacts. The ES sets out the proposed measures for significant impacts that can be mitigated.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	

6.1.2	Planning Forum	<ul style="list-style-type: none"> • LAs seek assurance that these controls will also be applied to urban park land used temporarily during the construction phase. • In addition to agriculture, forestry and woodland, there should be reference to other habitats (e.g. grasslands, heathlands, and wetlands) in terms of soils management. • Successful habitat translocation or creation depends on suitable soils with particular characteristics. Low fertility soils suitable for heathland creation and for species-rich grassland need to be maintained separately from agricultural topsoil and woodland soils. • There will need to be local plans for soils management related to specific mitigation and landscaping requirements. 	<p>Same as general comment above. N/A</p> <p>Refer to ecology section. Reference to soil reinstatement for habitat creation / ecological mitigation.</p> <p>Species-rich grassland sometimes to be maintained separately. Habitat translocation and creation will (where appropriate) be based on soil information derived from the EIA baseline surveys, including the identification different soil types, soil pH and nutrient levels.</p> <p>Soil survey information available from the EIA process will be used to produce Soil Resource Plans for geographic areas along the route, and this will inform the restoration of agricultural land and the landscape planting and ecology mitigation measures.</p>	The previous comments have not been addressed. Assurance regarding urban parkland not provided. Other habitat types not referenced. Soil reinstatement in reference to other habitat types not mentioned.	
6.1.2 and 6.2	NEF	Welcome any measures to avoid compactions of soils, particularly recognising that for all woodland soils, but particularly ancient woodland soils, the value of their undisturbed nature is significant.	No update - preventing compaction compaction of soils is covered in 6.2.4	Not sufficiently covered. 6.2.4 does not demonstrate recognition of value of undisturbed woodland soils.	
6.1.3	Planning Forum	Further details regarding proposed liaison with affected landowners, occupiers and agents is required, eg frequency, approach and consequences.	This principle was agreed by HS2 Ltd. In response to Petitions in the Hybrid Bill process. The intention of HS2 Ltd is to bring agricultural soils back to their former condition pre-HS2. HS2 shall prepare in consultation with the relevant landowner and relevant planning authority an agricultural soils plan in advance of construction - to be covered elsewhere not CoCP	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
6.2	Planning Forum	<ul style="list-style-type: none"> • Consideration must be given to the reinstatement of soils so as to reverse the negative effects of soil compaction. • Surveys will need to be undertaken on the seed bank in soils removed to identify important species lying dormant. • Specialist advice is required regarding soils for wildlife habitats such as heathland and species-rich grassland. 	<p>Good practice guidance on soil handling measures for the avoidance of soil compaction are incorporated in the HS2 Design Specification for the restoration of agricultural land.</p> <p>refer to wording provided through the LEMPs and set out in the first HS2 comment in row 1 above.</p> <p>Agreed and is covered by above in ecological mitigation.</p>	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
6.2	NEF	We think that either this chapter or the ecology chapter should reference the translocation of ancient woodland soils which is identified in the ES as a significant element of the ancient woodland compensation. The processes mentioned in the soils chapter are all relevant but the methodology applied to removing, storage and reinstatement of ancient woodland (also any soils gathered from SSSI sites intended for habitat creation elsewhere) will be crucial in determining the success of these measures. The full detail will need to be included in the contractors' EMPs for environmentally sensitive work sites.	Section 6.2.2 and 6.2.4 amended to include reference to ancient woodland soils	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	

6.2.2	Planning Forum	<p>Surveys should include recording hedgerow species/age, with a view to their reinstatement.</p> <p>Also type of agricultural land use should be recorded.</p>	The requirement is for the restoration of agricultural land back to its original quality. The restoration of what was originally agricultural land to other end uses (eg landscape planting or wildlife habitats) is proposed in places, but this will be subject to the agreement of the landowner, and possibly other stakeholders.	Will this be set out in the LEMPs - commitment to this?	
6.2.2 - 5th bullet point	NEF	Clarification is needed for the 5th bullet point as to whether the survey is a soil survey noting that the land use is forestry, or whether it is asking for a woodland ecological survey.	Amended	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
6.2.3	Planning Forum	Scope for betterment or ecological enhancement should be explored.	Not a CoCP issue - to be covered in other plans	Please specify which plans - reference	
6.2.4 (6.2.8)	Planning Forum	<ul style="list-style-type: none"> • Cross-contamination of different soils to be avoided. • It is our understanding that best practice is for stockpiles to be seeded: clarification is required with regards to sealing stockpiles as membranes should be permeable. • Measures should also include using tracked vehicles and not running vehicles directly on soils to avoid compaction. 	<p>Acceptable principle that we should not allow the mixing of contaminated/uncontaminated soils. In respect of the mixing of different soil types, HS2 Ltd. is committed to the separate stripping, storage and reinstatement of topsoils and subsoils. There will be mixing of different topsoils only - where they have similar physical characteristics, and the same will apply to subsoils.</p> <p>This will be covered by the Soil Resource Plans for geographic areas along the route, to meet the restoration and mitigation requirements for agriculture, land scape and ecology.</p> <p>Good practice guidance for soil handling will be carried out under appropriate weather conditions and using plant and machinery appropriate to the handling techniques deployed.</p> <p>HS2 Ltd is considering a commitment to the grass seeding of topsoil stockpiles, but not subsoil stockpiles. The objectives are to protect the stockpiles from erosion and loss of soil, reduce the generation of dust and to reduce the oxidation of organic matter and CO2 emissions.</p>	Where is the commitment to this in the CoCP?	
6.2.4	NEF	Care also to ensure that a risk based approach to biosecurity is taken in terms of moving soil around.	Covered in the new section 6.2.8	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
6.2.5	Planning Forum	There appears to be some wording or a reference missing from the last sentence of this paragraph.	Change made	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
6.3.1	Planning Forum	<ul style="list-style-type: none"> • Further details are required regarding monitoring, eg frequency and in how much detail. • Monitoring programmes should be agreed with LAs and reports made available to the LA and relevant stakeholders. • HS2 Ltd should provide details for noncompliance with Section 6 to the LA and a remediation plan provided in cases where monitoring highlights areas of concern. • HS2 Ltd should provide assurances on soil handling work completed along with details for the maintenance period including timescales for correction. 	<p>Monitoring details are being developed in the agriculture, forestry and soils inputs to the Phase One Project Requirements</p> <p>The “Code of Practice for the Sustainable Use of Soils on Construction Sites (Defra 2009)” refers to the requirement for a 5 year aftercare period established for land restoration in respect of HS1.</p> <p>Section 6.1.2 amended</p>	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	

6.2.8	NEF	Suggest that the term ‘crop’ is changed to ‘plant’ – reflecting increased priority that Defra is placing on plant health as a whole.	Change made	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
7. Air Quality	SECTION TO BE REVIEWED IN LIGHT OF UNDERTAKINGS				
General	Env Sub-Group	<p>In terms of implementing “good practice” reference should be made to the following guidance documents, or their contemporaneous equivalents, as a minimum:</p> <ol style="list-style-type: none"> 1. Guidance on the Assessment of the Impacts of Construction on Air Quality and the Determination of their Significance: Institute of Air Quality Management (IAQM), January 2012. 2. Air Quality Monitoring in the Vicinity of Demolition and Construction Sites: IAQM November 2012. 3. Up-dated Guidance on Construction Site Evaluation Guidelines and Mitigation Measures: GLA Supplementary Planning Guidance Document. <p>The document should reference the updated GLA guidance on the Control of Dust and Emissions During Construction and Demolition SPG, Mayor of London July 2014. This suggests a risk assessment approach, refers to the use of green walls and screens for hoarding, proper site maintenance controls, construction traffic management plan, and monitoring</p> <p>This Supplementary Planning Guidance (SPG) seeks to reduce emissions of dust, PM10 and PM2.5 from construction and demolition activities in London. It also aims to manage emissions of nitrogen oxides (NOx) from construction and demolition machinery by means of a new non-road mobile machinery ultra-low emissions zone (ULEZ).</p> <p>4. Best Practice Guidance: The Control of Dust and Emissions from Construction and Demolition: Mayor of London 2006.</p>	<p>Reference made to current publications / documents at time of CoCP version</p> <ol style="list-style-type: none"> 1. January 2014 updated version 2. Same 3. July 2014 GLA document <p>CoCP updated to reflect guidance documents</p>	BPM is a stat nuisance defence not a commitment AFARP implies a degree of risk assessment, AFARP. See bullet 2. AFARP may be a better fit here.	"will be controlled and limited as far as is reasonably practicable"
General	Env Sub-Group	<p>The CoCP makes no mention of site-specific dust assessment and the Councils require this to be a key element of the LEMPs. This is essential given the proximity of the route locally to hospitals, schools, residential homes and farm land. The National Planning Policy Framework makes it clear that a dust assessment study should be undertaken by a competent person/organisation with acknowledged experience of undertaking this type of work. The scope of a dust assessment study should be agreed with the contractor and local planning authority. Such studies should be used to:</p> <ul style="list-style-type: none"> • establish baseline conditions of the existing dust climate around the site of the proposed operations; • identify site activities that could lead to dust emission without mitigation; • identify site parameters which may increase potential impacts from dust; • recommend mitigation measures, including modification of site design; and • make proposals to monitor and report dust emissions to ensure compliance with appropriate environmental standards and to enable an effective response to complaints. 	To be covered in either LEMPs or more likely Contractors Environmental Management System documents (CEMPs)?	Will LPAs have sight of CEMPs?	
General	Env Sub-Group	Erection of hoardings or other barriers along the site boundary’ will not mitigate to any significant degree, dust arising from earthworks and transportation of spoil Dump trucks operating within the site boundary will not be sheeted.	<p>Erection of hoardings is a standard measure referred to in guidance document from IAQM & GLA.</p> <p>Almost all dump trucks will ultimately go onto the road and be sheeted.</p>	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
General	Env Sub-Group	Stockpiles are located near the site boundary in the Draft Environmental Statement.	If an issue there will be other mitigation as required by BPM.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
General	Env Sub-Group	Spoil material stockpiles are too large to be adequately watered or sheeted.	Other measures are possible e.g. seeding or binding and referred to.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
General	Env Sub-Group	Even haul roads surfaced with granular material will generate dust under heavy trafficking.	Other measures such as watering and speed control will be used. Surfacing does reduce dus	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
General	Env Sub-Group	Excavation and depositing of spoil in live working areas will not be on hard standing.	Unsure of comment	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
General	Env Sub-Group	In reality, significant emissions of dust are a natural consequence of major earthworks and the extent of emissions may be reduced by watering but never eliminated.	Industry guidance recognises this and provides measure to manage / reduce effects.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
General	Env Sub-Group	No trigger levels for dust emissions have been included in the COCP. In addition, though the ‘relevant local authorities will be consulted regarding the monitoring procedures to be implemented,’ there is no allowance for the rigour of independent monitoring and enforcement required to safeguard the local community.	Not to be included in CoCP. A separate monitoring strategy will cover these issues.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	

General	Env Sub-Group	During the construction phase, sensitive receptors are likely to be adversely effected by dust without appropriate, proportionate and effective dust management regimes.	Comment only - Noted	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
General	Env Sub-Group	There is no reference to emission such as NOx/NO2 which will be important for us as construction traffic on the roads will also be an issue for dust and emissions.	Been assessed in the ES	No baseline in ES only modelled using low resolution moitoring	
General	NEF	As previously advised (16/10/12), we recommend that contractors prepare a plan showing all adjacent protected sites that are sensitive to dust/air pollution and measures taken to avoid impacts on them.	To be covered in either LEMPs or more likely Contractors Environmental Management System documents (CEMPs)?	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
7.1.1	Env Sub-Group	Makes reference to 'potential nuisance'. What does this mean? Statutory is a high test and it would be expected that the 'test' to what is controlled or mitigated to be significantly lower i.e. amenity.	Section amended	SB Remove word "current" from bullet 5	
7.2.1	Env Sub-Group	States it applies to receptors and building which are 'sensitive'. Why does it only apply to 'sensitive receptors' and not all? 7.1.1 doesn't sub-class into 'sensitive' only. The provisions should apply to all receptors to a low standard such as amenity.	No change to CoCP - 'sensitive receptors' is a wide definition that is likely to cover most buildings	OK but why then constrain to sensitive buildings or other environmental receptors	
7.2.1	Env Sub-Group	Remove the "where reasonably practicable" or at least provide a robust definition.	No change	Suggest BPM be used rather than were reasonably practicable.	
7.2.2	Env Sub-Group	Low sulphur diesel should be used all the time not just "where reasonably practicable". Minimum specifications for vehicles should be specified to prevent older higher emitting vehicles from being used e.g. Euro standards	Air Quality Strategy to reference standards / euro emissions. Construction vehicles to conform to the current EU emission standards and HS2 will require Heavy Duty Vehicles (>3.5 tonnes) to be powered by Euro VI (or lower emissions engines).	Not acceptable Suggest an "exempt register" with agreed by LPAs ad promoters.	
7.2.3	Env Sub-Group	Obtain all consents required including any abstraction licence from the EA and water companies for the use of water as a dust suppressant. Consideration of if a drought/flooding takes place should also be considered in plans.	No change to CoCP	Noted	
7.2.8	Env Sub-Group	Will there be any concrete batching plants, if so where? Who will be responsible for environmental permitting? Mobile machinery such as Concrete Crushing and Screening plant shall be Permitted and Operated in accordance with the Environmental Permitting Regulations 2010.	Regulated process – no need for additional text.	Noted	
7.3.1	Env Sub-Group	In order to quantify the potential impact of dust emissions, a dust emission baseline should be established at relevant (sensitive receptor) locations along the route. These should include locations where human, ecological, and agricultural/horticultural receptors exist. This should include placing dust monitors at the perimeter of the site;	No – monitoring will only be undertaken where necessary. No scheme-wide commitment. To be likely detailed in Air Quality Monitoring Strategy	When will the strategy be completed.	
7.3.1	Env Sub-Group	Accordingly, an appropriate dust monitoring program shall be funded and implemented by the developer prior to any ground construction/engineering works commencing. The methodology and sampling locations shall be agreed by the relevant Local Authority. The results of dust monitoring should be reported to local planning authorities.	To be likely detailed in Air Quality Monitoring Strategy	When will the strategy be completed. Check with Adam	
7.3.1	Env Sub-Group	In addition the following should be included as part of the inspection checks: Perimeter hoardings will be regularly inspected and repaired as necessary, other hoardings will be regularly inspected and repaired.	Hoardings will be maintained as per Section 5.6	OK	
8. Cultural Heritage					
General	English Heritage	From 1 April, references should be to Historic England rather than English Heritage	Change to be made through Chapter	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	

8.1.1 - first paragraph	Chiltern DC	Is the CoCP meant to be a single account of the guiding principles for all proposed measures and standards of work to be used by both the NU and the contractors (other than for statutory works as explained by 2.1.3)? If so it is not quite clear why it contains some principles and not others. Either this needs to be clarified, or the document needs to be made more comprehensive and contain provision for some of the points mentioned below. (Perhaps I misunderstood when the Sub-Group last met, but I thought that it had been suggested that some matters had not been specifically spelled out because they would be the subject of instructions from the nominated undertaker's specialist heritage advisers to the contractors. This would seem to suggest a two-tier range of principles, and greater clarity will be needed as to how they relate. My apologies if I have misunderstood! In any case, please may I again suggest that it would be really helpful to see a diagram that explains how the documents relate to each other as part of the process for approving and implementing the works?)	Yes - refer to introduction section of CoCP Wording amended in 8.1.2 - Reference to Heritage Memorandum added	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
8.1.2	Chiltern DC	Accepted industry practice and guidance – which industry? - suggest “accepted heritage conservation practice and guidance”. Reference to the NPPF is very welcome.	Not necessary to mention but retained to provide additional comfort Section amended	The word "with" is missing	
8.1.3	South Northants	Given the inevitable time delay between the final ascent and approval of the ES Bill and some parts of construction additional information may become available which contractors may need to be aware of and that is not in the ES. Can we add a footnote to allow to ensure all relevant information has been taken into consideration, after all we still do not have geophysical results or research complete.	Reference to Information Paper E8 to section 8.1.2 Section 8.1.9 - Section amended	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
8.1.3	Chiltern DC	<u>First bullet</u> – “where these have been identified in the ES”. Please would it be possible to add: – “or agreed by undertaking, or where assets or vulnerability are subsequently identified prior to or during the course of works”. <u>Fourth, fifth and sixth bullets</u> – I am not clear as to why there is distinction between management of investigative works and facilitation of mitigation measures. As with the Memorandum I think that the vocabulary may need to better reflect the distinction between investigation in the archaeological sense and works to assess/monitor/make good/alter/demolish built assets or mitigate impact on their setting, with provision for all these works to be carried out by appropriately qualified heritage specialists. Will these specialists be appointed by the NU directly, or by the lead contractors? <u>Last bullet</u> – What exactly will “consulted” means here?	First bullet - section amended 4th bullet point - section amended 5th / 6th bullet points - no change	Please explain why 5th & 6th bullets not amended as requested?	
8.1.3 - 2nd bullet point	NEF	Suggest that the term ‘crop’ is changed to ‘plant’ – reflecting increased priority that Defra is placing on plant health as a whole.	Amended	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
8.1.4 - bullet point 1	Chiltern DC	First bullet – slightly tortuous - suggest re-wording and addition as follows: - Where works will have possible impact on structures or buildings of historic interest or on areas of heritage interest that may comprise archaeological remains, the nominated undertaker will require implementation of all reasonably practicable controls to avoid damage that might arise from settlement, or from the movement of construction vehicles and machinery, or from vacancy that will arise as a result of the works.	1st bullet point covers control damage by settlement only. Vacancy not a CoCP issue Wording amended to improve clarity	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
8.1.4 - bullet point 2	English Heritage	There is a reference here to procedures which are to be developed by lead contractors, in the event of nationally significant unanticipated discoveries. How does this relate to ‘the procedure’ referred to in 8.2.1?	Wording changed	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
8.1.4 - bullet point 3	South Northants	Bullet point 3 Where archaeological remains are proposed to be preserved insitu are they being evaluated and recorded first or is this implicit or do we need an cross reference to Heritage Memorandum.	No change	Please explain why no change.	
8.1.4 - bullet point 6	English Heritage	It is not clear what ‘expected interest’ means here? Why are these reported to the lead contractor’s project manager, rather than to the Nominated Undertaker, and what mechanism will exist to ensure any such finds are assessed by specialists? How might the mechanism outlined in 8.2 of the CoCP and S.6 of the HM be invoked if they are found to be of potential national importance?	Wording changed	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	

8.1.4 - bullet point 6	Bucks CC	<u>Look to add text in bold:</u> Should during the course of construction artefacts of archaeological interest or expected interest be located these will immediately be reported to the lead contractor's project manager (see 8.1.3 and 8.3.1) who will obtain specialist archaeological advice and undertake appropriate measures for their investigation and recording. (This may not occur without a general 'watching brief' on areas not covered by other investigation or monitoring)	Wording changed	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
8.1.4 - 8.3.2	Chiltern DC	At first glance it is not obvious why points have been collated as they have in the draft, and the distinctions between archaeology and built heritage measures become a bit blurred. Please may I suggest that re-organisation of the headings/points to help illustrate the process of preparing for and implementing the railway would be helpful, especially as this document will eventually be used by others who have not been party to the way HS2 language seems to have evolved: - Heritage Asset section – this appears to comprise preparatory provision – could it be more obviously re-titled as <u>“Preparation before works commence”</u> ?	Heritage assets refer to both archaeological and built heritage remains/assets. It is not the intention to have a clear distinction as the historic environment is addressed holistically. We recognise that in some cases a distinction is pertinent and where necessary text reflects that. No change	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
8.1.8	South Northants	WSI – should this be plural and refer to both the building and archaeological documents.	Section 8.1.8 amended	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
8.1.8	Bucks CC	<u>Look to add text in bold:</u> A project wide generic written scheme of investigation (WSI) will be prepared in advance of site preparation and construction, in consultation with English Heritage and the Local Authorities. For the purposes of this document, relevant statutory authorities will include the local planning archaeology advisors, English Heritage Inspectors and/or the English Heritage Science Advisor. This document will detail the generic principles, standards, methods and techniques to be employed on the project for cultural heritage works.	No change	Please explain why no change.	
8.1.9	Planning Forum	NEW COMMENT FROM LA'S - DECEMBER 2015		Sixth bullet point. Dismantled building will need to be stored appropriately, possibly for a number of years. Sixth bullet point should say "procedures for the recording, dismantling, storage and re-erection of buildings of heritage significance."	
8.1.10	South Northants	This relates to known assets, I'd be more comfortable if it at least made reference to any yet to be identified.	Section amended	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
8.1.11	South Northants	Presumably this is different to consent process, is there any further information guidance on what this Method Statement should cover	No change (Schedule 17)	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
8.2.1 - sub title	Bucks CC	<u>Comment in bold -</u> Measures in the event of unexpected discoveries of national significance. (This may not occur without a general 'watching brief' on areas not covered by other investigation or monitoring)	Reviewed and amended text to address their concerns about what happens if we find remains of less than national importance.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
8.2	South Northants	I know we have discussed the issue of finds which are not of national significance but can there not be some procedure of notification and opportunity for local assessment within the process as long it does not unreasonably delay construction	Amended section	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
8.2 - title	Bucks CC	<u>Comment in bold -</u> Measures in the event of unexpected discoveries of national significance. Would expect a section on unexpected discoveries of regional and local importance.	Amended section	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
8.2	English Heritage	We have commented on the use of the term 'national significance' in previous consultations on the CoCP and on the Heritage Memorandum. We understand the use of the term is being reviewed in the latter, and for consistency it needs to be reviewed here. We have suggested the term 'national importance' as this is recognisable and has clear criteria. This needs to be clearly cross-referenced to S6 of the HM, and the mechanism there	Amended section	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
8.2.1	English Heritage	Refers to 'the procedure' previously agreed with EH and the local authorities. We have questioned this before: what procedure is being referred to here?	Procedure still to be written. Text clarifies	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
8.3.1 (Risk Assessments) and 8.3.2 (Monitoring)	Chiltern DC		No change to the CoCP.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
9. Ecology					

General	Planning Forum	All construction work should be carried out in line with the forthcoming British Standard 420202 Biodiversity – Code of Practice for Planning and Development.	No change	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
9.1.1	Planning Forum	This should be amended to state that “appropriate measures” will be informed by up-to-date ecological survey information and not just limited to that reported in the ES. Due to the poor quality and limited data available in the ES, further surveys are required in order to identify areas of ecological value on all sites to be used during construction and on adjacent sites.	Not to be covered in the CoCP	Please explain	
9.1.2	Planning Forum	Sites of Importance for Nature Conservation and “parks and open spaces” should also be included. Ecology protection measures should be applied to all trees and other species of high conservation value including mature London Planes.	Covered in 9.2.5 - not explicitly mention SINC's in general Covered in 12.1.1 Tree protection covered in 12.2	Who will sit on ecological review group?	
9.1.2	NEF	We advise that this section specifically mentions ancient woodland – this also follows a similar approach to the National Planning Policy Framework inclusion of ancient woodland (Paragraph 118)	3rd bullet point in Section 9.1.2 has been amended	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
9.1.2	NEF	We advise that this section specifically mentions ancient woodland.	Section 9.1.2 has been amended to include a reference to ancient woodland	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
9.1.3	Planning Forum	Important information on surveys and monitoring included in the draft CoCP has been removed from this section. Why has this information been removed?	Not sure what information has been removed - needs to be clarified	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
9.1.4	Planning Forum	The following should be inserted; “reinstatement procedures to be implemented for any areas of temporary habitat loss and temporary arrangements for displaced species”, and should be amended to include permanent arrangements for displaced species to ensure their long-term survival.	Reinstatement design is outside the scope of the draft CoCP.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
9.1.4	Planning Forum	All construction workers should be made aware of ecological receptors, with special inductions for areas of particular sensitivity	Covered broadly in 4.3.3 and 4.3.4	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
9.1.4	Planning Forum	‘Plans showing the locations of all known areas of nature conservation interest ...’ should include ‘no-go’ areas that are not to be entered during construction or at particular times of year (e.g. sensitive bird nesting habitat, fragile ecosystems).	Previous comment from Oxfordshire CC. Specialist view was to be dealt with within the LEMPs as appropriate.	Please state that this will be covered by LEMP	
9.1.4	Planning Forum	Plans of measures to facilitate animal movement during construction to reduce the impacts of fragmentation and severance should be provided.	Previous comment from Oxfordshire CC. Specialist view was to be dealt with within the LEMPs as appropriate.	Please state that this will be covered by LEMP	
9.1.5	Planning Forum	The words "where it is reasonably practicable" are unnecessary and dilutes protection.	Disagree with comment	Please explain	
9.2.5	Planning Forum	Any accidental habitat damage or loss should be compensated for according to an agreed biodiversity offsetting metric. For instance where trees intended to be retained are accidentally felled or die as a consequence of construction works, they should be replaced in an appropriate ratio: e.g. one mature oak tree should not be replaced with one oak sapling.	Biodiversity offsetting metric is purely a measure. Was not used to design compensation/mitigation. Ratio's are not used either - professional judgement! Previous comment from Oxfordshire CC. Design / compensation issue rather than amendment to CoCP	Please explain where this will be set out	
9.2.6	Planning Forum	It should be made clear whether licences granted by Natural England will be route-wide or site-specific. Also whether additional surveys will be undertaken prior to works commencement to inform such licence applications. If so there should be the capacity to provide amended/additional ecological mitigation/compensation in the event of changes to baseline data.	Licences still to be determined cannot be amended once received from NE	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	

9.3	Planning Forum	<p>The CoCP should state that the following details will be incorporated into LEMPs (Note: this might involve some duplication with text in the CoCP, but the LEMP should have more specific objectives and deliverables as outlined below):</p> <ul style="list-style-type: none">• The identification of all known areas and features of nature conservation interest potentially affected, in particular, those areas to be retained. This should include site plans at an appropriate scale indicating protection zones, work area and access routes etc.• Protection measures to prevent incursion into or damage of retained habitat areas, and steps to ensure that all site personnel are aware of the need to avoid damage.• Protection measures, both temporary and permanent, to prevent disturbance or encroachment into adjoining areas of nature conservation interest whether by air, land or water.• Procedures for the establishment, maintenance and auditing of ecological records.• Procedures for the safeguarding and, where agreed, relocation of protected and notable species identified from appropriate ecological survey under formal licences where necessary, including details of the receptor sites and monitoring of relocations.• Procedures to be adopted in the event of unanticipated discovery or disturbance of protected species or important habitats of high ecological value.• Procedures for the control of plants listed in Schedule 9 (and other invasive plants) of the Wildlife and Countryside Act 1981 or other relevant statutory provisions, to the satisfaction of Natural England and the Environment Agency.• Methods for ecological watching briefs.• Measures to re-use local ecological resources, including the collection of seeds (e.g. from wildflower meadows) and cutting from trees and shrubs to enable replacement/reinstatement with appropriate native stock of local provenance.	Details relating to procedures for working within ecological sensitive areas will be included within the LEMPs	Please state that this will be covered by LEMP	
9.3	Planning Forum	<ul style="list-style-type: none">• The programme for undertaking ecological surveys prior to and during construction should be agreed with LAs. Details of the surveys should also be available to comment upon.• A monitoring programme should be agreed with LAs, including the post-construction period until new habitats are firmly established.• Monitoring and survey work should be informed by data held by local environmental records centres eg Greenspace Information for Greater London.• Conversely any survey data collected as part of this project should be submitted to local environmental records centres to ensure that data informs future site management and biodiversity conservation.• The nominated undertaker should be responsible for implementing remedial actions where monitoring identifies the effectiveness of the management measures designed to control ecological effects have been insufficient for purpose	<p>NE are the statutory body - responsibility will lie with them</p> <p>(Ecological Review Group (ERG) - LA's and Stakeholders - will be detailed within the Env. Mem)</p> <p>HS2 Policy decision</p>	Please provide appropriate references	
9.3.1	Planning Forum	A plan should be in place for if further surveys demonstrate changes since the initial mitigation measures were developed. If the ecological value of areas has increased, further mitigation should be consulted on with the LA and the appropriate related stakeholders and implemented.	Design issue, not construction	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
9.3.2	Planning Forum	It should be specified that survey and monitoring should be carried out by personnel with suitable expertise and experience and that specialist ecological advice may be required to support contractors.	Sections 4.3.3 and 4.3.4 covers all staff competencies	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
10. Ground Settlement					
General	Planning Forum	<p>Is the Settlement Policy referred to the same as the Information Paper on Ground Settlement? If so, LAs request input into this policy.</p> <p>LAs are disappointed to note that important paragraphs relating to surveys and monitoring have been removed from this latest version of the CoCP and request they be reinstated having taken into account the following points:</p> <ul style="list-style-type: none">• Details should be submitted under the Party Wall etc. Act 1996 to the relevant parties and this should be referenced as such.• HS2 Ltd need to clarify how they will identify which properties may be potentially subject to ground settlement/movements above threshold values that could possibly lead to damage.• There is enough information in the public domain to do preliminary measurements now• Monitoring should be carried out for a year, not for only 3 months.	Information Paper C3, Settlement refers. No need to include reference within CoCP	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	

10.1	Planning Forum	<p>The process by which ground settlement is monitored should link to a free telephone number for residents. It should also state what action would be taken if settlement did occur.</p> <p>There is no reference to any dispute resolution mechanism or who would act as the arbiter in the instance of a dispute regarding allegations of ground settlement: such a mechanism must be considered and included in the CoCP or the Settlement Policy.</p>	Information Paper C3, Settlement refers (except the phone number) - no need to include reference within CoCP	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
10.2	Planning Forum	<p>There may be more information in other documents but it would be expected that there would be more included on the basic approach / principles to be adopted to be set out in the CoCP than is currently the case.</p> <p>Special attention should be paid to the impacts of settlement on listed properties.</p>	Information Paper C3, Settlement refers	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
11. Land quality					
11.2.2	Env Sub-Group	NEW COMMENT FROM LA'S - DECEMBER 2015		This requirement for contractors to consult MPAs about prior extraction of minerals is supported. The code could also advise that contractors should discuss with the MPA at the earliest opportunity proposals that could involve extraction of minerals on land adjoining or near to the construction scheme where there would be a requirement for separate planning authorisations.	
11.2.4	Env Sub-Group	The methodology for such an assessment requires early consideration, including maximum contaminant standards and sampling frequency per volume of material.	<p>Statement is out of context to reference:</p> <p>11.2.4 Measures to be implemented will include, as appropriate, undertaking ground investigation work, risk assessments, monitoring of ground movement, groundwater and ground gas, and undertaking structural or condition survey of buildings or structures adjacent to the works where there may be potential risks of ground movements which may damage structures (as set out in Section 10 of this CoCP).</p>	?	
11.2.4	Env Sub-Group	The results of any testing of soils for re-use, or test results of imported soils should be submitted to the local authority responsible for enforcing the contaminated land regime.	<p>As above, notwithstanding, where soils are imported from outside of the scheme, HS2 will ensure that the soils are suitable for use, including chemical quality where relevant.</p> <p>It is not normal land development practice (other than for residential schemes or where imported soils are of dubious origin) to submit test results to the local authority.</p> <p>For soils sourced from within the scheme HS2 will use the Cl;aire Code of Practice to manage the movement and placement of these soils, ensuring that all materials are suitable for use.</p>	?	

11.2.7	Env Sub-Group	The following wording should be added; and approved by the relevant Local Authority and/or the Environment Agency.	<p>11.2.7 Where significant contamination is encountered, a remedial options appraisal will be undertaken to define the most appropriate remediation techniques. This appraisal will be undertaken based on multi-criteria attribute analysis that considers environmental, resource, social and economic factors in line with Sustainable Remediation Forum UK A Framework for Assessing the Sustainability of Soil and Groundwater Remediation (2010). The preferred option will then be developed into a remediation strategy, which will be consulted on with regulatory authorities prior to implementation.</p> <p>HS2 has stated that it will consult with local authorities on issues of contamination and, where this has a potential impact on Controlled Waters, will seek acceptance from the Environment Agency.</p> <p>HS2 has set out its approach to contamination investigation and remediation which, in the absence of any identified contaminated sites within the Proposed Scheme, will be undertaken as voluntary</p>	Noted	
11.2.13	Env Sub-Group	Early identification of private water supplies / boreholes should be obtained from Local Authorities.	<p>11.2.13 Any specific remedial treatment undertaken in relation to land affected by contamination will be carried out under the appropriate remediation permitting system where these apply.</p> <p>LA comment seems out of context with the paragraph (copied above).</p>	Noted	
General	Env Sub-Group	There may be other sensitive premises in addition to hospitals, schools, residential homes and farms	Noted - no need for CoCP update	Needs to be aligned with NI/TR policy	
12. Landscape and Visual					
General	Planning Forum	Where is townscape covered? 12.1.1 talks about protecting visual amenity in urban areas but the rest of chapter 12 appears to address rural only. (Townscape was included in the draft CoCP).	Landscape' is an all encompassing word - the ES explains that the term Landscape which is an all encompassing term, including townscape	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
General	Planning Forum	There should be reference to including any local work being undertaken on landscape and design issues to reflect what may be included in local assurances or other workstreams supported by the Nominated Undertaker and local authorities.	Comment not understood	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
12.1.1 - Specialist Staff	Planning Forum	Any staff involved with landscape works should have relevant specialist ecological supervision/support, especially in relation to vegetation clearance/tree works etc.	Covered in 9.2.3 already and 3rd bullet point & 12th bullet point in 12.1.1	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
12.1.1 - Timing	Planning Forum	Bullet 6. It is not clear how far in advance of vegetation removal planting schemes will be initiated/ completed where compensatory habitat is to be created. The further in advance this can be undertaken, the more potential impacts of the overall scheme will be reduced.	Not a CoCP issue and will vary from site to site	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
12.1.1 - Compounds	Planning Forum	Add a bullet point to reduce the impact of compounds by locating them in areas screened by topography or woodland.	Site specific issue and would be considered in the relevant LEMPs	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
12.1.1	NEF	We advise that this section explains that appropriate controls will be put in place to protect both visual amenity and key aspects of the landscape. We also advise that it should clarify the meaning of 'the sustainable management of landscape issues'.	Section 12.1.1 amended. Sustainable management reference has been deleted	Commitment that it will be covered in the LEMP?	

12.2 - Protection of trees	Planning Forum	There should be a reference to consulting with LAs' Trees & landscape officers and tree owners on trees covered by Tree Preservation orders & Conservation Area. The removal and replacement of trees and species selection should be agreed with Tree officers and/ or an arboricultural consultant approved by the Arboricultural Association.	Any TPO will be disapplied under the Act and so consultation will not be required Trees will be retained where possible, appreciation of high quality trees and so no liaison with LA's required	Should also include Hedgerows	
12.2	Planning Forum	There is no mention of bat protection in relation to trees. Reference should be made to the Conservation of Habitat & Species Regulation 2010 here or in Chapter 9 Ecology.	Covered in Section 9: Ecology, section 9.1.4 bullet point 8	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
12.2.5	NEF	This states that an arboricultural assessment will be undertaken if individual stands of trees need felling that were not identified in the ES. We advise that it should mention that the LPA's agreement will be sought if any of the trees are protected (ie by a Tree Preservation Order or being within a Conservation Area).	Not a CoCP issue	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
12.2.6 - Removal or damage to trees	Planning Forum	Any tree removal, damage to trees during the progress of works and trees that have been subject to excessive tree work should be replaced in an appropriate ratio. e.g. the accidental felling of one mature oak tree should not be replaced with one oak sapling, as this will not provide any kind of 'like-for-like' replacement from an ecological perspective. Any accidental habitat damage or loss should be compensated for according to a biodiversity offsetting metric and/or a CAVAT valuation, to ensure net ecological enhancement.	Like for like - no net loss commitment under biodiversity. No ratio determined as such - professional judgement will be used for the numbers of trees to be planted Not a CoCP issue as reinstatement part of approval process under the hybrid Bill (Schedule 16?)	Should also include Hedgerows Can you please explain how this is covered by the Bill? Some concerns remain here. The response that replacement will be 'like for like' is not acceptable as it is not possible to replace mature trees with mature planting. At present there is no reference to maintenance of individual trees in any documents and maintenance of the majority of hedges (accidental tree loss is likely to be from hedges) will only be for 5 years. The replacements will not have attained the stature of the original trees by then. Replacement of a higher number of trees than is lost is necessary to reduce the resulting detrimental effects on biodiversity and landscape caused by tree loss. Additionally, if a tree has been accidentally felled and removed there may be no evidence of the size/contribution of that tree as there is no requirement for tree survey of access routes. SCC specialists have not had sight of a 'HS2 Landscape Common Design Approach document' so are unable to properly assess the adequacy of this aspect of the response.	
12.2.6	NEF	We have been advising (via the process to prepare the Planting Procurement Strategy) that rather than specifying just local provenance, to ensure resilience to climate change, the specification should include using a mixture of provenances, a proportion of which should come from 2-5 degrees of latitude further south than the site. Could refer as well to the Planting Procurement Policy.	Section 12.2.6 amended to include reference to the HS2 temporary landscape design strategy	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
12.2.7 - Tree replacement	Planning Forum	There is no mention of transplanting root balled trees or BS4043, 1989 and Nursery Stock, Part 1, : Specification for Tree & Shrubs.	BS4043 seems to have been withdrawn.	Can someone please confirm? What about the other standards?	
12.2.7 - Tree replacement	Planning Forum	There should be some statement regarding the position with respect to Ash Dieback disease and the potential for planting of this species. It is not expected that a commitment be made to the planting of this species, but if within the lifetime of the project disease resistant Ash trees are identified that may be suitable for use, then this should be considered as an option. A commitment should be added to monitor the situation as it develops and take appropriate action in liaison with appropriate agencies	Not a CoCP issue - design issue not construction. No change	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	

12.3.3 - Consultation on proposals	Planning Forum	LAs request further information on the consultation process and the status it will have. LAs should approve any planting schemes and it will be crucial to get landowner support and approval for any works.	Not a CoCP issue - design issue not construction. No change	Please provide information of where this would be covered	
12.3.3	NEF	We welcome that 'relevant local authorities, NE, EH, NT and other bodies (where they have an interest) and adjacent landowners' will be consulted regarding the landscape and planting proposals. We recommend that the 'other bodies' include the Chilterns Conservation Board for proposals relating to the Chilterns AONB.	Not a CoCP issue	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
12.4.1 - Monitoring	LAs - Planning Forum	It is not clear who will undertake the responsibility to monitor, manage and replace following construction, to ensure landscaping is delivered appropriately as it matures	Added detail referencing the HS2 Information Paper E16 - Maintenance of landscaped areas and Information Paper e26 - Indicative periods for the management and monitoring of habitats created for HS2 Phase One.	The COCP also refers to E16 Maintenance of Landscaped areas. This document states that within a set distance of the line, indicated as Zone C on Figure 1 which includes the crest line of mitigation bunds, 'the height of planting will be limited' for operational reasons. No height is given – what will it be limited to and is this what has been assessed in the LVIA? Further, regarding woodland planting there is a contradiction between Papers E16 and E26 Indicative Periods for Management and Monitoring of Habitats. E16 states in 6.6 that woodland (visual mitigation and habitat) will typically be managed for 5 years, minimum 10 years for ecological mitigation woodland. Table 1 in E26 indicates for woodland (including screening planting) a duration of 10 years management and monitoring where for the 'primary purpose of landscaping'; up to 50 years for ecological mitigation / compensation. The timescale indicated in E26 are supported, not E16, and this should be confirmed.	
12.4.1 - Monitoring	Planning Forum	HS2 crosses different areas of landscape character; each area sufficiently different to require a tailored approach to landscape design. A Landscape Design Strategy that addresses the specific requirements of each landscape should be produced for consultation with the LAs. It is difficult to distinguish between landscape impacts and their mitigation during construction and post construction so the Strategy should be consulted on at an early stage.	Not a CoCP issue - design issue not construction. No change	Please provide information of where this would be covered	
12.4.3 - Maintenance	Planning Forum	Bullet 8. It is not clear how long inspections, maintenance and management of existing and new planting be the responsibility of the nominated undertaker post construction. There appears to be no mention of young tree maintenance provision for the first 1 to 5 years, and replacement of failures. It is not clear what mechanisms will be put in place for maintenance and management of new habitat. (Is this covered in the Environmental Memorandum?)	Not a CoCP issue - design issue not construction. No change	Please provide information of where this would be covered	
General	NEF	The ecology chapter highlights noise/vibration as potential ecological impacts and refers on to this chapter, but the noise/vibration chapter itself does not mention noise impacts on ecological/landscape receptors. We advise that there should be some extra text here about the methodology for avoiding/minimising noise/vibration impacts on sensitive ecological receptors such as protected species and designated sites.	No change	Please explain why no change.	
13. Noise and vibration	NEEDS TO BE UPDATED IN LIGHT OF UNDERTAKINGS				
General	NEF	The ecology chapter highlights noise/vibration as potential ecological impacts and refers on to this chapter, but the noise/vibration chapter itself does not mention noise impacts on ecological/landscape receptors. We advise that there should be some extra text here about the methodology for avoiding/minimising noise/vibration impacts on sensitive ecological receptors such as protected species and designated sites.	No change	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	

13.1.1 Identification of "other" receptors	Planning Forum	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council notes that other sensitive receptors specifically references "local businesses and quiet areas designated by the local authority". However, Camden Council does not consider that this goes far enough and in particular the reference to quiet areas is too restrictive. Camden Council considers that in a densely populated urban location such as Camden all areas of relative tranquillity are considered sensitive receptors and the impact of noise on them should be adequately considered.	
13.2.1	Env Sub Group	Chiltern noted that BPM is not defined in CoPA Section 7 as suggested by the CoCP	Note that the CoCP's requirement for the contractor to consider BPM is a strong commitment		
13.2.4 Noise and vibration management methods	Env Sub Group	EHPs also raised concerns about the control of multiple contractors and requested further details on how multiple contractors and their impacts will be managed.	Confirm that CEMPs and Noise and Vibration Management Plans (NVMPs) are to be agreed between the Nominated Undertaker and the Contractor and are not subject to review by the local authority Still yet to be defined – not for CoCP	Camden Council notes the methods outlined here are high level recommendations when compared to the level of detail outlined within, for example, the Crossrail CoCP. Camden Council recommend that further technical detail is provided on management methods.	
13.2.5 Section 61 consents	Planning Forum	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council consider that information about Section 61 consents should be included in the stakeholder liaison strategy, where up-to-date information is communicated.	
13.2.6 Section 61 consents	Planning Forum	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council notes that the CoCP states that final detailed construction programmes are only likely to be available a short time in advance of work starting on site. Camden Council will expect to see construction programmes presented and communicated to the local community well in advance of works starting on site. Without a detailed construction programme it is difficult for Camden Council and HS2 Ltd to assess the full impact of the works on the borough.	
13.2.8	Env Sub Group	EHPs requested for draft submissions of Section 61 consents to be required from contractors before formal submissions made.	To be considered – not for CoCP		
13.2.8				Require a commitment to using construction vehicles and machinery with the lowest noise and vibration emissions that are available at the time of the works.	
13.2.10 Information on S.61 consents tied in with Information on Working Hours in Chapter 5.	Env Sub Group	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council consider it would be useful if the information on S.61 consents could be tied in with the information on working hours within Chapter 5 so that all information on working hours strategy is presented together. At least could a cross ref to this chapter be made?	

13.2.10 Noise Insulation and temporary re – housing policy	Env Sub Group	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council consider that based on experience, it will take at least 18 months from the date of identifying which properties require noise insulation packages to its installation, due to factors such as the requirement to undertake a public procurement exercise, the commissioning of the works, and the notification and engagement processes with residents. It is therefore considered that the noise insulation / temporary re-housing appraisal needs to be submitted at least 18 months in advance of works to allow for consultation and reasonable notice given to residents and to ensure that these works can be satisfactorily completed in time for the commencement of the construction works. This means the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time.	
13.2.10 Noise Insulation and temporary re – housing policy	Env Sub Group	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council consider that the proposed policy needs to link with the proposed LEMPs and Section 61 applications/consents to identify the number and type of re-housing required.	
13.2.10 Noise Insulation and temporary re – housing policy	Env Sub Group	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council considers that information should be provided on what type of re-housing is proposed, who is providing it and where will it be located? Camden Council consider that this information should have been available prior to the Bill deposit and are disappointed to note that it was not.	
13.2.10 Noise Insulation and temporary re – housing policy	Env Sub Group	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council seeks clarification on what duration defines housing as ‘temporary’. Camden Council considers that more than 6 months would be considered permanent.	
13.2.10 Noise Insulation and temporary re – housing policy	Env Sub Group	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council recommends information is provided on the policies in place to protect non-residents, e.g. schools, health care facilities such as hospitals and surgeries, residential/respite care homes and businesses. Camden Council considers there must be a mechanism in place for considering each on case by case basis. Need to link to provisions in habitability assesment - NEED TO CHECK	
13.2.10 Noise Insulation and temporary re-housing policy – Impact on businesses	Env Sub Group	NEW COMMENT FROM LA'S - DECEMBER 2015		<p>Camden Council notes that under this policy, the CoCP states that additional protection will be given to residents in the event that it is not practicable to mitigate noise, or reduce its exposure through the installation of noise insulation. However, it is not clear from the CoCP whether these measures will also apply to businesses. It is essential that the same mitigation and compensation measures are offered to businesses in Camden affected by the HS2 proposals.</p> <p>Camden Council considers that each affected business will need an assessment of noise impacts and the offer of insulation or other mitigation solutions to be paid for by HS2 Ltd. If insulation or another mitigation solution is not practicable or businesses choose not to take it up because of the disruption it will cause, they should be fully compensated.</p>	
13.2.10 Noise Insulation and temporary re – housing policy	Env Sub Group	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council considers that provision should be given for effects from vibration in addition to noise is required and should be addressed by this policy.	
13.2.10 Noise Insulation and temporary re – housing policy	Env Sub Group	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council considers that provision should be given for effects from ground borne noise in addition to air bore noise is required and should be addressed by this policy.	

13.10-15	Env Sub Group	EHPs asked if vibration would be included in the Noise Insulation and Temporary Rehousing policy.	Vibration impacts would be covered in Section 61 consents but that it did not expect significant vibration effects to occur at residential properties during construction.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
13.2.12 Trigger levels Noise Insulation and temporary re-housing policy	Env Sub Group	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council note that more than one incident (above tolerable levels) per year would be considered a trigger to permanent re-housing. Each case would be agreed in consultation with the tenant. Camden Council consider it would be reasonable to offer permanent re-housing with the right to return between periods of disruption	
Table 1	Env Sub Group		Confirm that the levels in this table are consistent with those both used by Crossrail and cited in BS 5228 Part 1, except those for Sunday which reflect what was applied in the Phase One EIA.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
Table 1		NEW COMMENT FROM LA'S - DECEMBER 2015		Crossrail using total noise (construction + ambient or 5dB above pre-existing)	LANC Negotating
13.2.13 Noise Thresholds for noise insulation/temporary re housing	Env Sub Group	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council note there is a variation in the threshold used for noise insulation within this CoCP compared to that which is understood to be in place for the Crossrail project. This specifically relates to the cut off point for the timing of day time and night time criteria for between Sundays and public holidays. The HS2 CoCP places the cut off at 22:00 whilst that of Crossrail places it at 21:00, thereby offering a better level of protection for residents. It is recommended that the latter threshold, as that used for Crossrail, is utilised for HS2. Camden Council considers that justification for an alternative approach to that used for Crossrail is required at the earliest opportunity.	
13.2.16 Vibration thresholds and actions	Env Sub Group	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council requires confirmation as to how, and against what levels, public and community buildings (such as schools and children's centres) will be measured	
13.2.18 Vibration trigger values	Env Sub Group	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council suggest that the trigger value for "dwellings" also includes hospitals	
13.2.19 Vibration trigger values	Env Sub Group	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council note the reference to "routinely exceeded" and consider that the word "routinely" should be omitted. Camden Council consider that this wording is open to interpretation in its current form and therefore requires amendment.	
13.2.19	Env Sub Group		Confirm that the vibration trigger levels in Table 2 apply to different types of property, and not just residential.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
13.2.23	Env Sub Group	EHPs requested further clarity on the required qualifications/competencies of those who will be undertaking scoping vibration assessments. EHPs also requested clarification on the timing of such an assessment	Confirm that this assessment is likely to take place once a risk assessment of the Noise and Vibration Management Plan had been undertaken.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
13.2.23 If vibration levels are predicted to be above acceptable levels those potentially affected will be notified in advance of the works.	Env Sub Group	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council seek confirmation of how long in advance of the works residents are to be informed. Camden Council consider that the wording "seek to agree" should be "agree" or "obtain". Camden Council note that the Crossrail CoCP committed the Nominated Undertaker 'to obtain' s61 consent. This is a weaker position for the LPAs when compared to Crossrail and Camden Council seek justification for this approach and amendment to the position utilised for Crossrail as soon as possible.	

13.2.26	Env Sub Group	EHPs sought clarification on whether or not those carrying out surveys would be independent.	Refer to meeting minutes from Nov – confirming not needing to be independent but requires appropriate qualifications.. Numerous comments in this regard received previously. Previous response: Independent monitoring is not within the scope of the CoCP.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
13.2.26 First bullet point - “..seek to agree with the local authority...”	Env Sub Group	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council consider that the wording “seek to agree” should be “agree” or “obtain”. Camden Council note that the Crossrail CoCP committed the Nominated Undertaker ‘to obtain’ s61 consent. This is a weaker position for the LPAs when compared to Crossrail and Camden Council seek justification for this approach and amendment to the position utilised for Crossrail as soon as possible.	
13.2.26 Third bullet point – “carry out a condition survey before and after the relevant works...”	Env Sub Group	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council consider that an independent surveyor is to carry out the condition survey before and after the works and HS2 is to cover cost. Camden Council consider the wording should reflect this.	
13.2.26 Reference to surveys of properties.	Env Sub Group	NEW COMMENT FROM LA'S - DECEMBER 2015		Camden Council consider that any structural survey should consider the combined impact of excavation in close proximity, as well as the effect of prolonged vibration activities on the buildings. For example, the tower blocks on Ampthill and the flatted developments on the Regent’s Park Estate need to be carefully assessed prior to works and closely monitored during both excavation and vibration works.	
13.3	Env Sub Group	EHPs requested clarification on the required qualifications/competencies or those who will be undertaking monitoring. HS2 Ltd confirmed that the issue of competency is covered in the CoCP.	Covered in Sections 4.3.3 and 4.3.4	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
13.3.3-4	Env Sub Group	EHPs requested further clarification on how the LEMP and Section 61 process for identifying monitoring locations described in these paragraphs would work in practice.	Confirm that the proposals for monitoring locations put forward by the contractor are likely to be informed by the ES and 13.3.4 allows for adjustment to these locations where detailed discussions with local authorities identify additional/alternative monitoring locations.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
13.3.5	Env Sub Group	EHPs requested further clarification on how exceedances identified by monitoring data will be dealt with.	Onus on exceedance investigation will be down to LA’s enforcing powers under S60	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
Extra	Env Sub Group	HS2 Ltd to confirm where control of multiple contractors is covered in the draft CoCP	Not a CoCP issue, although Section 4.1.2 covers this to an extent?	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
Extra	Env Sub Group	EHPs requested further clarification on how exceedances identified by monitoring data will be dealt with. HS2 Ltd to confirm that National Grid will be contractually committed to comply with the CoCP requirements	Relates to PICP 5.12 and EMS 3.4.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
Extra	Env Sub Group	HS2 Ltd to clarify if vibration surveys referenced under 13.2.6 will be carried out by independent surveyors	Addressed in previous comment	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
Extra	Env Sub Group	HS2 Ltd to consider including wording in 13.2.23 to clarify that the levels of vibration which would cause damage to buildings are magnitudes greater than those levels which affect people and therefore building damage will be quite unusual compared to effects on people.	Reference to BS 7385 already detailed within CoCP	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14. Traffic & Transport	SECTION SHOULD BE AMENDED TO REFLECT UNDERTAKINGS				
14.1.1. - Traffic management general provisions	Highways Sub-Group	<u>Suggested amended wording:</u> During its construction works, the nominated undertaker will require that the impacts on the local community (including all local residents and businesses), visitors to the area, and surrounding transport network from construction traffic are minimised by its contractors and that public access is maintained at all times, where possible, and all measures will be implemented to ensure the local community, economy and transport networks can continue to operate effectively.	Comment noted, with the following amendments: • Where reasonably practicable is the correct legal definition to use in this instance, not ‘where possible’. • “All measures” is not accepted as measures to be implemented will need to be appropriate to the location concerned. Not all measures will be applicable in every location. ‘Appropriate’ measures is therefore used.	??	

14.1.1 - Traffic management general provisions	Highways Sub-Group	<u>Suggested amended wording:</u> Where this is agreed with the local highway authority as not being possible, alternative measures shall be identified to maintain continual public access, especially for pedestrians and cyclists, to routes in the vicinity of the development.	Partially accepted with following notes: • There is no requirement to agree with highway authorities, but the matter will be discussed via proposed local traffic liaison group meetings (TLG's). Details of TLG's is included in the Route-Wide Traffic Management Plan.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.1.1 - Traffic management general provisions	Highways Sub-Group	<u>Suggested amended wording:</u> The impact of road based construction traffic will be reduced by identifying and enforcing clear controls on vehicle types, hours of site operation, parking and routes for all construction vehicles. <i>Arrangements for oversized vehicles will be agreed in advance with the local authority.'</i>	Partially accepted with following notes: • Enforcement of the EMRs is covered by the draft General Principles and section 4.1 of the CoCP – it is not necessary to repeat this at each juncture. • Abnormal/Oversized loads will be managed through present notification processes required. Therefore it is not necessary to reiterate this requirement here. (see 14.2.3). Revised text : During its construction works, the nominated undertaker will require that the impacts from construction traffic on the local community (including all local residents and businesses and their customers, visitors to the area, and users of the surrounding transport network) are minimised by its contractors, where reasonably practicable. The nominated undertaker will require that and public access is maintained where reasonably practicable, and appropriate measures will be implemented to ensure the local community, economy and transport networks can continue to operate effectively. Where this is not reasonably practicable, alternative measures shall be identified to maintain continual public access, especially for pedestrians and cyclists, to routes in the vicinity of the construction sites. The impact of road based construction traffic will be reduced by identifying and monitoring clear controls on vehicle types, hours of site operation, parking and routes for large goods vehicles.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.1.1 - Traffic management general provisions	Highways Sub-Group	The impacts referred to in the 1st line need to be defined, for example whether they are in terms of congestion, air pollution including dust, noise, consequential rat running etc.	The impacts are defined as 'from construction traffic'. Where other impacts emerge (e.g. air quality), these are covered by other sections of the CoCP. No Changes Proposed.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.1.1 - Traffic management general provisions	Highways Sub-Group	It needs to be specified how will this part of the CoCP will be integrated with planning for a major incident (defined as an incident resulting in multiple serious injuries and/or cases of ill health).	It is unclear as to why this is required. Emergency Access protocols will be included in Traffic Management Plans as appropriate. Where necessary, a pre-agreed approach to closures of strategic routes may also need to be adopted within the proposed Local Traffic Management Plans. In the event of any major incident HS2 will operate under any instructions given by relevant responders (E.g. Police/Fire/Ambulance/Local Authority/Environment Agency/HSE). No change proposed.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.1.2 - Traffic management - general provisions	Highways Sub-Group	<u>Suggested amended wording:</u> 'Construction workforce travel plans will be prepared in advance by the lead contractors and agreed in writing in advance with the local highway authority...'	There is no requirement to agree construction workforce travel plans with the highways authority. See amended text at 14.1.2. However, the CoCP commits the promoter to prepare travel plans through engagement with highways authorities.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.1.2 - Traffic management general provisions	Highways Sub-Group	<u>5th bullet point:</u> 'Mechanisms and targets to reduce and, where adequate sustainable transport modes are available, prevent car journeys by the workforce, together with arrangements to monitor and ensure compliance with these targets.'	Noted: Have clarified that the 5th bullet point is referring to both public transport network and services. The sixth bullet point already includes a requirement to reduce car journeys.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	

14.1.2 - Traffic management general provisions	Highways Sub-Group	<p><u>Add new bullet points</u></p> <ul style="list-style-type: none"> - Parking management plan for staff and visitors. No on-site parking provision should be made for staff or visitors’ vehicles, unless agreed in advance as essential with the local highway authority in writing due to lack of feasible alternatives. - Provision to encourage use of sustainable travel modes, such as cycling - Information provided to employees regarding availability of public transport and access by sustainable travel modes to the worksites. - Details of cycle storage provision for staff and visitors shall be provided. - A list of key contractor/NU contacts responsible for ensure implementation and compliance with the Travel Plan. 	<p>There is no requirement to agree on-site parking with the Highways Authority. Depending on local geography, it is not always going to be possible to prevent car journeys but this can be managed through on-site parking management. If on-site parking is provided, a further bullet on parking controls has been included. These measures may be within a construction workforce travel plans.</p> <p>Noted and incorporated as an objective of the travel plan (see below).</p> <p>Add: “Construction workforce travel plans will be required to set out proposals for site access for construction workers, taking into account the availability of public transport routes and facilities for cycling and walking according to anticipated demands. Where appropriate, plans will include secure, sheltered cycle parking and safe access to welfare facilities for workforce and visitors, including layouts for visitor, and any worker, parking.”</p>	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.1.2 - Traffic management general provisions	Highways Sub-Group	It should be specified that Travel Plans should include all staff and visitors.	The plans are for construction workforce. Visitors to the sites are expected to be limited and the lead contractor will be able to inform given visitors on travel arrangements. Given visitors different requirements (e.g. enforcement officers, educational visits etc) it would also not be appropriate to make it a strict requirement for visitors to comply with a travel plan that would have been prepared for the construction workforce.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.1.2 - Traffic management general provisions	Highways Sub-Group	The objectives of these travel plans needs to be specified in the CoCP.	<p>Objectives are already set out in the HS2 London – West Midlands Environmental Statement – Volume 5, Technical Appendices, Transport Assessment (TR-001-000) Appendix A: Framework travel plan.</p> <p>Add: “Objectives to support these aims will include:</p> <ul style="list-style-type: none"> • effective management of construction worker traffic to minimise damage to the environment, impact on the surrounding road network, danger to road users and disturbance to neighbouring properties; and • the introduction of measures to reduce single occupancy car journeys by staff working on construction sites through the encouragement of car-sharing, use of available public transport, cycling and walking to work where reasonably practicable.” 	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.1.2 - Traffic management general provisions	Highways Sub-Group	Penalties for not achieving the targets set out above in the amended 5th bullet point need to be specified in the CoCP.	Add: “Regular workforce travel surveys will be undertaken and the results shared with the relevant stakeholders.”	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.1 - Measures to reduce potential transport impacts during construction	Highways Sub-Group	It needs to be specified where these measures will be recorded and publicly available in order to verify compliance	<p>Measures will be discussed with relevant stakeholders via proposed local traffic liaison group meetings which has been made more explicit as a generic measure under 14.2.2.</p> <p>The rest of the section sets out where different measures will be recorded (e.g. in Traffic Management Plans).</p> <p>No change proposed</p>	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	

14.2.2 - Traffic management - generic measures	Highways Sub-Group	<p><u>Suggested amended wording of 1st line, as follows:</u></p> <p>‘Generic measures will be discussed and agreed in advance with the local highway authority and any other appropriate authorities and will include as a minimum:’</p> <p>Agreed measures need to be and clearly stated in this CoCP (see above), so that they are easy to refer to. These stated measures should be minimum requirements. The CoCP should include scope for consideration by HS2 Ltd of more onerous site specific requirements, if the local highway authority asks for them. It needs to be specified how these measures will be implemented and enforced and how local highway authorities will be able to access and audit procedures.</p>	<p>The CoCP and Hybrid Bill is designed to strike a reasonable balance between the need to deliver the project efficiently with flexibility while providing statutory authorities with a sufficient level of input. The Nominated Undertaker will be required to consult upon the Traffic Management Plans (both routewide and local) and it is considered that this mechanism is sufficient to allow any concerns to be raised, alongside any other discussions on routewide measures taking place at the Highways Sub-Group. All measures will be engaged on via local traffic liaison group meetings. In some respects, it may be subject to changes during the lifetime of the construction.</p> <p>Revise “Generic measures, which will apply route-wide, will be discussed in advance with the local highway authority and any other appropriate authorities”, this will form the start of the RTMP section.</p>	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.2 - Traffic management - generic measures	Highways Sub-Group	<p><u>1st bullet point:</u></p> <p>Measures referred to are to be agreed in advance in writing with the local highway authority. Route surveys to be carried out prior to commencement and following works to determine deterioration due to "extraordinary traffic (S59 HA)". Mitigation of potholes arising due to extraordinary traffic to be included.</p>	<p>As discussed in the Highways Subgroup to the Planning Forum, various requirements for extraordinary traffic or repair of damage to roads are not disapplied and there is a specific clause related to diversion of traffic from a road of a higher standard to a lower standard contained in the protective provisions (Schedule 31, part 1).</p> <p>Measures related to the method of monitoring will be included within the proposed Route-wide TMP and consulted on via the Highways Subgroup. This is already included as bullet point 1.</p> <p>No change is proposed.</p>	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.2 - Traffic management - generic measures (3rd bullet point)	Highways Sub-Group	<p><u>Amend 3rd bullet point as follows:</u></p> <p>‘All drivers (including those working for any contractors or sub contractors) to be at least Silver level Fleet Operator Recognition Scheme (FORS) accredited, additionally all drivers to a minimum of Gold level FORS accreditation a maximum of 12 months from the commencement of the construction period. All drivers also shall be fully trained to Construction Logistics and Cyclist Safety (CLOCS) driving standards as a minimum and complies with a management framework for managing road traffic safety that complies with ISO 39001 to protect pedestrians and non-motorised traffic and that drivers undertake fuel efficiency training; and employment of appropriate use of technology to remove blind spots’</p>	Measures will be set out within the proposed Route-wide Traffic Management Plan with regard to the proposed requirements for quality plans and standards, implementation and monitoring of driver and vehicle safety standards.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.2 - Traffic management - generic measures (8th bullet point)	Highways Sub-Group	<p><u>Amend 8th bullet point as follows:</u></p> <p>‘Permitted access routes and accesses to which construction traffic will be restricted’</p>	<p>Restrictions will already apply to use of roads in the local area to or from worksites where more than 24 Large Goods Vehicle movements/day are forecast. Other restrictions will apply in accordance with Undertakings and Assurances. There is however not a ‘blanket’ restriction on all other routes for cars, vans etc, or on routes large good vehicles take to sites where there is less than 24 movements per day.</p> <p>No change is therefore needed.</p>	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.2 - Traffic management - generic measures (11th bullet point)	Highways Sub-Group	<p><u>11th bullet point:</u></p> <p>There should be a minimum level of monthly reporting of monitoring.</p>	<p>This will depend on the frequency of proposed local traffic liaison meetings and what reporting is requested and if the data is available (or reasonably could be made available). It also depends on the criticality of monitoring. To place the frequency of monitoring in the cocp is therefore over-onerous at this stage.</p> <p>No change.</p>	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	

14.2.2 - Traffic management - generic measures	Highways Sub-Group	<u>Additional bullet points:</u>	The Promoter agrees that a number of the bullet points could be applicable on a routewide basis. But not all will be relevant at all times and in all locations. Therefore “Other measures to manage construction traffic on a routewide basis will include, as appropriate and where reasonably practicable” will be added with reference to the comments below.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.2 - Traffic management - generic measures	Highways Sub-Group	<u>Additional bullet points:</u> Measures to minimise movement of waste (including on site re-use of materials, where possible)	See comment below as these are more specific options for minimising waste and materials transport on the public highway. Waste recovery etc. is covered by Chapter 15 of the draft CoCP and it is not intended to repeat measures here.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.2 - Traffic management - generic measures	Highways Sub-Group	<u>Additional bullet points:</u> Measures to maximise use of rail or water transport for movement of construction waste	Agreed. Amended wording: “Measures to maximise use of rail or water transport for movement of materials and waste in bulk”.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.2 - Traffic management - generic measures	Highways Sub-Group	<u>Additional bullet points:</u> Measures to minimise the number of construction vehicles and their impact on businesses, residents, visitors to the area and local transport networks by effective management and phasing	This is already covered in 14.1.1 and so no change is proposed.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.2 - Traffic management - generic measures	Highways Sub-Group	<u>Additional bullet points:</u> <u>All construction vehicles conform to the latest EU emissions standards to minimise the impacts on air quality</u>	Agreed Please refer to para 7.2.2 of the Draft CoCP as this is an air quality matter.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.2 - Traffic management - generic measures	Highways Sub-Group	<u>Additional bullet points:</u> Regular operation of traffic liaison groups with key stakeholders to ensure co-ordination of works on the public highway, for example with other highways and major development schemes, works of statutory undertakers information and diversions	HS2 partly agrees to the principle of the bullet point. The co-ordination of works is partly the role of Local authorities. A revised point has been added to confirm that (1) regular co-ordination will occur and (2) HS2 Limited will share advanced programmes and (3) to assist highway authorities with their network management duties.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.2 - Traffic management - generic measures	Highways Sub-Group	<u>Additional bullet points:</u> Commitment to provide a dedicated free 24 hour telephone number for members of the public to report problems, with a reporting system for responses.	Not incorporated as community liaison and contact is a project-wide issue and included in the CoCP in section 5.1. No change made	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.2 - Traffic management - generic measures	Highways Sub-Group	<u>Additional bullet points:</u> Allow reasonable and lawful access of third parties to premises, for example within the area or vicinity of a closure of land or highway.	Noted. However, this is a clause in the Protective Provisions (Schedule 31, Part 1, Para 8) and will be incorporated in to the proposed route-wide TMP as such. It is not necessary to list this as a ‘general’ measure in the CoCP itself. No change made	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.2 - Traffic management - generic measures	Highways Sub-Group	<u>Additional bullet points:</u> The Nominated Undertaker will work with the Highway Authorities and Emergency Services to establish active traffic management systems at junctions where significant construction traffic could cause disruption	This is a local area or site specific issue and may need to be addressed in proposed local Traffic Management Plans or in site specific consultation or notifications as necessary. It is not necessary to list this as a generic measure as it is unlikely to apply on a routewide basis and is too specific. No change made	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	

14.2.3 - Traffic management - generic measures	Highways Sub-Group	<p><u>Amend to read:</u> ‘Routes for construction traffic will be discussed and agreed in principle with the highway authority and, in the case of any construction traffic routes which utilise the strategic road network (particularly, but not exclusively, in relation to indivisible abnormal loads), the Highways Agency prior to being submitted for approval of the relevant planning authority in accordance with the hybrid Bill.’</p>	<p>Partly agree</p> <p>Note that consents for lorry routes is a planning matter and that the “relevant planning authority means the unitary authority or, in a non-unitary area, the county council in whose area the development is carried out”</p> <p>Proposed text: “Lorry routes will be set out in the LTMPs and as set out in the Planning Memorandum, the nominated undertaker will have forward discussions, where reasonably practicable, on lorry route applications prior to submission.”</p> <p>Abnormal load procedures will be maintained as currently required, such as use of the EDSL notification system, and it is not necessary to refer to these in the CoCP. Abnormal loads will also be covered in the RTMP.</p> <p>The Hybrid Bill does not require the Nominated Undertaker to seek approval of lorry routes on special or trunk roads.</p>	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.4 - Traffic management - generic measures (TMP's)	Highways Sub-Group	<p><u>Amend initial paragraph to read:</u> ‘Prior to commencement of the works, the nominated undertaker will ensure that Traffic Management Plans (TMP’s) will be produced in consultation with the highway and traffic authorities and the emergency services and shall be submitted for approval by the local highway authority prior to commencement of works.</p> <p>The TMP’s will include as a minimum: ’</p>	<p>The CoCP and Hybrid Bill is designed to strike a reasonable balance between the need to deliver the project efficiently with flexibility while providing statutory authorities with a sufficient level of input. The Nominated Undertaker will be required to consult upon the Traffic Management Plans (both routewide and local) and it is considered that this mechanism is sufficient to allow any concerns to be raised, alongside any other discussions on routewide measures taking place at the Highways Sub-Group.</p> <p>The amended text in the restructured draft COCP on routewide and local TMPs is clear that the TMPs will include elements where appropriate. In addition, the route wide TMP will include a number of other items as identified in the revised CoCP.</p> <p>No change.</p>	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.4 - Traffic management - generic measures (TMP's)	Highways Sub-Group	<p><u>3rd bullet point:</u> The Vehicle Management Strategy could be extensively developed before contractors appointed as the local authorities know their area issues and interface/boundary issues.</p>	<p>It is proposed that there will be a route-wide traffic management plan, local traffic management plans and site specific issues will be dealt with through specific notifications or consents submissions.</p> <p>No change.</p>	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.4 - Traffic management - generic measures (TMP's)	Highways Sub-Group	<p><u>Additional bullet points:</u> Construction and Traffic Management Plans (CTMP’s) shall be submitted to the local authority and no works shall take place until these have been approved by the local authority. The CTMP’s shall form part of the LEMP and shall be complied with</p>	<p>As above, it is proposed a route-wide traffic management plan, local traffic management plans and site specific issues will be dealt with through specific notifications or consents submissions.</p> <p>It is proposed that, following the revisions to Chapter 14 of the CoCP following these comments, that the chapter is restructured to reflect this proposed structure of route-wide, area and site specific.</p> <p>Assuming this is intended to be a combination of site specific and generic measures the promoter response is as follows below:</p>	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	

14.2.4 - Traffic management - generic measures (TMP's)	Highways Sub-Group	<p>The CTMP shall include:</p> <p>Detail about specific traffic management that would be required and the process of submission and approval</p> <p>Commitments for traffic management that minimises the impacts on highway users</p> <p>Application and consent processes need to be developed and implemented in partnership with the local authority</p> <p>Commitment to produce these plans in consultation with highway authorities and the emergency services and other key stakeholders</p> <p>Identification of site boundaries and the main access/egress points for the worksites</p> <p>Identify temporary and permanent closures and diversions of highways and public rights of way</p> <p>Detail proposed traffic management strategy</p> <p>Identify key on street facilities required to facilitate construction such as lorry holding areas, site compounds</p>	<p>Agreed details that are required locally will be set out in either consents or the LTMPs</p> <p>Procedures for temporary closure, interference, consents and notifications will be set out within the proposed routewide TMP.</p> <p>Agreed (will be set out in the proposed RTMP, on a generic basis and local TMPs on an area basis).</p> <p>Agreed, was already identified as a generic measure and will be contained in the proposed RTMP (will also be discussed with the Highways Subgroup and set out in the proposed RTMP).</p> <p>Agreed. Add “relevant” (Note this was already a feature of the TMP)</p> <p>Already included in text</p> <p>Already included in text</p> <p>Add “management” to the text</p> <p>Add “Other measures which will affect the highway, such as lorry holding areas”.</p> <p>The establishment of proposed local traffic liaison groups will be</p>	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.4 - Traffic management - generic measures (TMP's)	Highways Sub-Group	<p>The CTMP's will be made available by the Promoter/NU to local Parish Councils, Businesses and residents via a website.</p>	<p>No change – community relations is dealt with in section 5.1 of the CoCP.</p>	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.4 - Traffic management - generic measures (TMP's)	Highways Sub-Group	<p>There needs to be a clear Lorry Management Plan (LMP) to ensure that construction vehicles are actively managed to minimise disturbances and impacts on the public highway in each authority as well as adjacent highway authorities.. The LMP needs to include:</p> <p>-local routes to be used by lorries generated by construction activity;</p> <p>-lorry holding areas;</p> <p>-lorry route signing strategy;</p> <p>-means of monitoring lorry use and any routes prohibited from use.</p>	<p>Add: “ In relation to lorry management, LTMPs will include details of the following, where appropriate”</p> <p>Agreed</p> <p>Agreed</p> <p>Agreed - although this is to be a routewide matter and is contained in the RTMP</p> <p>Agreed - although this is to be a routewide matter and is contained in the RTMP (Note the routewide element of monitoring for deviation from authorised routes was contained in the previous COCP version).</p>	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.4 - Traffic management - generic measures (TMP's)	Highways Sub-Group	<p>Construction and Traffic Management Plans (CTMP's) and Lorry Management Plans (LMP's) shall be agreed in advance of implementation with the local authority and shall form part of the LEMP's, however the requirements of CTMP's and LMP's should be listed in this section of the CoCP for the sake of clarity.</p>	<p>It is proposed that there will be a Route-wide Traffic Management Plan and Local Traffic Management Plans, along with site-specific submissions. The proposed Local TMPs will extend the scope of the LEMPs. This change in structure will be adopted in the CoCP.</p> <p>With respect to requiring agreement, please see our comments above. (Row 239)</p>	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.4 - Traffic management - generic measures (TMP's)	Highways Sub-Group	<p>The TMP's will be made available by the Promoter/NU to local Parish Councils, Businesses and residents via a website.</p>	<p>No change.</p> <p>Community relations is a separate section of the CoCP.</p>	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	

14.2.4 - Traffic management - generic measures (TMP's)	Highways Sub-Group	An example of a TMP should be provided	The scope of proposed LTMPs will be consulted on with the Highways Subgroup to the Planning Forum. No change	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	Amend 1st line to read (subject to additional notes below): 'Site specific traffic management measures will include the following, as a minimum:'*	The promoter has set out the need for route wide and local distinction in traffic management plans. Therefore, "As a minimum" is not required as inclusion will be dependent on local circumstances.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	Notes- It needs to be specified where the process for informing, applying or agreeing any of these site specific traffic management will be recorded. These need to be agreed in advance with the relevant highway authorities.	Add text following the bullet points to read: Where reasonably practicable and necessary, site specific measures will be discussed with highway authorities and the emergency services and via local meetings, prior to any formal submissions required by the HS2 Bill or non-disapplied highways legislation"	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	The Highways Agency will require input into all site specific or generic measures affecting the strategic road network, for safety reasons and to discharge its statutory duties.	Highways Agency (Highways England) will be engaged via meetings and, as required, through the proposed local traffic liaison meetings. This is also made clear in the consultation on LTMP and RTMP paragraphs as Highways England is a Highways Authority. No change	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	It needs to be clarified that references to any 'road' includes footways, cycleways and carriageways. References to footpaths could should also include ' public paths' in order to cover bridleways etc	Agree. Add new first paragraph: "Site specific traffic management measures may include temporary interference to carriageways, footway, cycleways, verges, public paths and other public rights of way such as bridleways and their respective users."	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	<u>Amend the following bullet points to read (subject to resolution of additional note below):</u> - 3rd bullet point: 'Timing of operations which operations will be limited to core hours set out in paragraph 5.2.2, unless covered by the circumstances set out in paragraphs 5.2.6-5.2.11 regarding additional working hours.'** **Note- However, there is a need to ensure that TM on existing highway is not automatically allowed during any core hours. The default in the TM should generally be for off-peak hours only.	Partially Agreed The CoCP already contains commitments on working hours so it is not necessary to repeat them here. But will clarify that this relates to "site" operations and associated traffic movements. Add new bullet point "Timing of traffic management operations, if their scope can be undertaken during off-peak, night or weekend working"	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	<u>Add to end of 4th bullet point:</u> '...including air ambulances and protecting corridors for emergency vehicles'	Agreed	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	5th bullet point: 'A list of roads to which any construction vehicles will be limited to use in the vicinity..'	Agreed, adding "and any commitments set out in the register of Undertakings and Assurances".	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	Highway works required to accommodate construction traffic shall be identified, agreed with the local highway authority and implemented at cost to the NU.	Add to second bullet point "...including works necessary for site access for construction traffic, which will be subject to consultation with the relevant highway authority".	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	7th bullet point: 'Emergency access controls'	Any controls will be included within the terms of emergency access protocols. No change.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	13th bullet point: measures to ensure that construction vehicles do not cause damage to grass verges to roads, pavements, other areas used by the public and any highway structures; also refer to trees, hedgerows, flora and fauna	There are various protective provisions within the Bill with regard to damage and it is not necessary to include additional details here, which will need to be considered on a site-by-site basis. See below for change	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	14th bullet point measures to ensure that any damage to grass verges, roadways, pavements, other areas used by the public and any highway structures trees, hedgerows, fungi, flora and fauna is repaired and reinstated to the satisfaction of the local highway authority at full cost to the Nominated Undertaker and that birds, mammals, reptiles, insects are protected.	Amalgamate both bullet points to read "measures to ensure that construction vehicles do not cause damage to highways, and measures to ensure that any damage to grass verges is repaired and reinstated" The ecology section of the CoCP sets out measures in relation to ecology and it is not necessary to repeat them here,	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	

14.2.5 - Traffic management - site specific measures	Highways Sub-Group	15th bullet point: lorry holding areas including detail needed of lorry capacity, on-site/off site facilities for drivers, vehicle access arrangements and site management, including controls to hours of vehicle movements to holding areas and operation to prevent idling of engines, use of radios and any other machinery used.	Revise to read “lorry holding areas on- or off-highway, how they will be laid out and operated” It should be noted that Road vehicle Parks are subject to the approval of the qualifying planning authority (district or unitary) under Paragraph 3 of Schedule 16.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	22nd bullet point: Speed limits and controls on site and on construction vehicle routes’	Add “to reduce environmental impacts to nearby receptors and consideration of temporary reduced speed limits around worksites”.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	<u>Additional bullet points:</u> - Control of construction vehicle numbers and types consistent with and no greater than those set out in the Environmental Statement	The Environmental Minimum requirements, general principles places a requirement on the Nominated Undertaker not to exceed the impacts. See Information Paper E1, no change is proposed.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	Controls to hours of construction site vehicle movements	No change proposed as working hours is covered elsewhere in the CoCP.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	All road based traffic attending and leaving sites, including the vehicle operators and the vehicle drivers, will abide by the Construction Logistics and Cyclist Safety (CLOCS) Standard as a minimum and comply with a management framework for managing road traffic safety that complies with ISO 39001.	Dealt with under 14.2.2, as a route-wide standard.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	Where temporary alterations to the highway are required, there must be a commitment for the highway to be restored to the satisfaction of the local highway authority. There should be a commitment that all reinstatement should be undertaken in a timely manner and agreed with the local highway authority.	See Information Paper E14 paper (paras 7.13 – 7.14) – Schedule 31 - Protective provisions - Part 1 for requirements in relation to reinstatement.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	Surveys shall be carried out prior to construction to establish the condition of the highway prior to the commencement and after the completion of HS2’s works, in consultation with the highway authority.	Agreed. The type of surveys to be set out in the proposed RTMP, the area/scope to be within the proposed LTMP. No change.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	Internal haul routes and site access should be designed to facilitate safe access to the highway in a forward gear when entering and leaving the site.	The design of accesses will be subject to the approval of the relevant local highway authority under Schedule 4 part 1 of the Bill. No change is needed to the CoCP.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	Site access points must be designed to minimise queuing traffic adjacent to access points and need to minimise impact on the Strategic Road network (SRN), sensitive streets and junctions	Noted. See above comment. No change.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	Any site hoardings need to also incorporate Legible London pedestrian signs (or local equivalent outside of London) to facilitate pedestrian access around the site boundary.	Hoardings are dealt with elsewhere in the CoCP, no change needed in this section. Hoardings are also subject to approval by the qualifying planning authority or class approval under Schedule 16, Paragraph 4 and 5. No Change	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	Details of proposed work, mitigation measures (especially for oversized and abnormal traffic), and any potential remediation measures (kerbing, verge, carriageway defects).	This is already set out in the proposed 2nd bullet point of 14.2.5	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	Details of publicity – work with LPA / HAs press offices, etc.	This will be a matter for discussion at proposed local traffic liaison meetings on a case-by-case basis. No change.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	Co-ordination with ecologists to mitigate unnecessary removal of hedges or untimely hedge cutting	This is related to ecology. No change.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	Winter Gritting of haul routes additional to the previous established gritting routes undertaken by the relevant local authority will be the responsibility of the NU.	Agreed, but simplify to “Winter gritting plans, which will complement those of the relevant highway authority”.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	Provide details to ensure no material is deposited onto the public highway, drainage intercepts, etc.	Relocate comment into the Road Cleanliness section and to read “ensure no material is deposited onto the public highway which will affect drainage intercepts, etc	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.5 - Traffic management - site specific measures	Highways Sub-Group	<u>21st bullet point:</u> GPS vehicle location and tracking should not be limited to ‘tipper lorries within the lead contractors’ control to be used for the movement of materials for the movement of materials and waste in bulk’ but should be extended to all commercial vehicles being used by the lead contractor and sub-ordinate contractors.	CoCP text has been amended to clarify. See section 14.2.5 for revised wording.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	

14.2.6 - Road Cleanliness	Highways Sub-Group	A procedure is needed in winter for clearing vehicles and roads and footpaths without the use of water, in order to prevent water getting on to the highway and freezing, thus creating a hazard.	Agreed, and include bullet point “Measures to avoid water runoff onto the adjacent highway (footways or carriageways, including avoiding ponding adjacent to hoardings on the carriageway”.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.2.7 - Road Cleanliness	Highways Sub-Group	<u>Amend to read:</u> 'Each day after completion of any works affecting a highway, at the end of all surplus materials arising from the works will be cleared from the highway, leaving it in a clean and tidy condition in accordance with the reasonable requirements of the highway authority.'	Amend to clarify that this would relate to works protected by lightweight barriers, rather than works on the highway protected by Heras fencing or hoardings. To read: “For works which are being undertaken on the highway which are not protected by secure Heras-type fencing or hoarding, then at the completion of each day’s works, the site is to be left in a tidy condition. All surplus materials arising from the works will be cleared from the highway, leaving it in a clean and tidy condition in accordance with the reasonable requirements of the highway authority”.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
14.3.1 - Monitoring	Highways Sub-Group	3rd line. 'traffic management measures and responsive remedial action taken to address complaints' The process for monitoring impacts of traffic management needs to be clarified in this document, not the contractor’s EMS, and these should be agreed with the local highway authorities. Specify minimum intervals for regular liaison with highway authorities and the emergency services. Monitoring processes need to be transparent and accessible on public records. The highway authority should be able to audit the contractor’s EMS. Resourcing of administration and monitoring by local authorities needs to be addressed. It needs to be clearly specified how contractors sub-ordinate to the lead contractor will be managed.	Monitoring and compliance with the CoCP is covered elsewhere in the CoCP and it is not necessary to address this in this section. As the CoCP makes clear, it is for the nominated undertaker to monitor its’ contractors and compliance with the CoCP. Complaints and community relations are covered elsewhere in the CoCP and in relevant Information Papers (G3: Complaints Commissioner, G2: Community Relations and E1: The Control of Environmental Impacts).	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
TFL COMMENTS					
General	TfL	The SoS will use all reasonable endeavours to obtain agreement from TfL to the proposed terms of the CoCP before it is submitted to the relevant local authority or authorities for its or their approval.	The Promoter disagrees with this requirement. The Code of Construction Practice (CoCP) will form a part of the Environmental Minimum Requirements that HS2 will be committed comply with during construction of the scheme. As powers for HS2 are being sought through a Bill it is the Parliamentary process that will confirm the EMRs. Therefore, it is not appropriate for the approval of TfL or local authorities to be sought. As we have explained, the draft CoCP is in draft stage at the moment and has recently been subject to feedback from planning authorities via the planning forum and its’ various sub-groups. It should be noted that TfL attend the Highways Sub-Group to the Planning Forum and the GLA has been invited to all the meetings of the Planning Forum. It is through the Planning Forum and its Sub-Groups that the views of the authorities, including the GLA and TfL have been sought on the CoCP. If TfL have concerns regarding the CoCP, they can feed these to HS2 through the HS2 planning forum and its relevant sub-groups. Further discussion on a 4th version of the CoCP will take place after the end of House of Commons Select Committee.	Needs review in light of undertakings	

General	TfL	Requirements for the development of construction logistics plans to minimise the transportation of those materials, plant and equipment;	<p>HS2 does not believe amendment requested is needed.</p> <p>The revised draft CoCP (3rd version) due to be shared at Planning Forum and subgroups in July 2015 will still contain the following requirement on the Nominated Undertaker which will be binding on any contractors:</p> <p>“During construction works, the nominated undertaker will require that the impacts from construction traffic on the local community (including all local residents and businesses and their customers, visitors to the area, and users of the surrounding transport network) are minimised by its contractors where reasonably practicable.”</p> <p>This requirement will be translated into more specific measures that will be set out in the Route-wide Transport Management Plan and Local Traffic Management Plans which will be consulted on. Consultation on the Route-Wide TMP will begin this year at the Highways Sub-Group to the Planning Forum. The requirements in these documents will be binding of HS2’s contractors.</p> <p>This will be in addition to the General Principles of the EMRs (para 1.1.5) to use reasonable endeavours to further reduce environmental effects.</p>	Needs review in light of undertakings	
General	TfL	The setting of targets for the use of rail and water for the transportation of construction materials where reasonably practicable, such targets to be consulted upon by TfL before the commencement of any construction works.	<p>In the consultation on the traffic and transport section of the draft CoCP other authorities have raised this comment. HS2 recognises the benefit of utilising rail and water for transportation where reasonably practicable to do so and consequently is prepared to include this as a matter that will be contained in Routewide Transport Management Plan which will be consulted upon with highways authorities. As such, the Promoter is considering amendments to the CoCP to address this matter and any specific wording to address this matter will be discussed at the Highways Sub-Group when it considers the 3rd draft of the CoCP in July 2015.</p> <p>Given the amendments to the CoCP that are being considered the Promoter does not believe targets are necessary or appropriate as a suitable obligation will be placed on the nominated undertaker.</p>	Needs review in light of undertakings	
General	TfL	Requirements for the adoption of and compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics by HS2 Ltd and its contractors in implementing the HS2 Works;	<p>The Promoter intends to adopt best practice for vehicle and driver safety measures. Most, if not all, CLOCS requirements will be incorporated into contractual requirements. However, given that the construction of phase 1 of the project will not commence until 2017 and will continue to 2026, the promoter wishes to retain flexibility to require additional (or better) safety measures, appropriate for the project, rather than specify (and fix) the term CLOCS within contractual documentation and the CoCP.</p> <p>The promoter will consult on vehicle and driver safety measures as this will be contained in the Route-wide Transport Management Plan, which will inform the project’s contractual requirements. HS2 Ltd also considers that revised wording that is proposed to be included in the draft CoCP to be discussed at the Highways Subgroup in July will address this concern.</p> <p>While the precise wording has yet to be finalised it is expected to be along the lines of:</p> <p>“The RTMP will include as appropriate</p> <ul style="list-style-type: none">• measures to provide for road safety for all modes for the public and construction staff during traffic management works and temporary traffic control measures;• contractor implementation of driver training programmes relevant for their specific environment (e.g. to protect pedestrians and non-motorised traffic); <p>vehicle safety measures including signage, mirrors, prevention of under-running and use of technology to remove blind spots according to vehicle size;”</p>	Needs review in light of undertakings	

General	TfL	Requirements for FORS (Freight Operator Recognition Scheme) accreditation to a minimum of 'silver standard' but with provisions to encourage the achievement of 'gold standard', for operators of vehicles operated for the purposes of or in relation to the HS2 Works	<p>The Promoter has considered this request and is proposing a change to the CoCP that will require quality plans for the management of fleet operators. The precise wording has yet to be finalised it is expected that it will require the Route-Wide Traffic Management Plan to address contractor quality plans for management of construction vehicles through the supply chain.</p> <p>The promoter considers that such plans will need to address the themes within the ISO39001 standard or those within the FORS standard. As this will be contained in the Route-wide Transport Management Plan and will apply on a route wide basis HS2 will consult on these as per the commitment for consultation n Transport Management Plans currently contained in the CoCP.</p>	Needs review in light of undertakings	
General	TfL	Requirements for a Cycling Engagement Strategy, in order to increase cyclist awareness of construction activity and lorry routes associated with the HS2 Works;	<p>The draft CoCP currently contains a requirement that:</p> <ul style="list-style-type: none">• “measures to provide for road safety for all modes for the public and construction staff during traffic management works and temporary traffic control measures;” <p>These are likely to be generic measures that will be discussed on a route wide basis. The Promoter is however considering how the requirements in this bullet could be expanded to address engagement with cyclists and other vulnerable road users. While the precise wording has yet to be finalised it can be expected to require measures, which may include engagement with vulnerable road users (pedestrians, motorcyclists, cyclists and equestrians), to provide for road safety for all modes for the public and construction staff during traffic management works and temporary traffic control measures. As with other changes to the CoCP it will be considered at a future meeting of the Highways Sub-Group.</p> <p>Further to this the Promoter’s approach to community engagement is set out in section 5 of the draft CoCP and also Information Paper G2. In addition, section 6 of information paper E13 contains the approach the promoter will take in relation to consultation in respect of traffic impacts which includes establishing traffic liaison groups. Paragraph 6.2 states:</p> <p>“Once contractors have been appointed, regular traffic liaison meetings will be arranged with highway authorities, bus operators, taxi and trade representation (as appropriate), and the police - other emergency services will be included, as appropriate. These meetings will provide an opportunity for contractors to present proposals for future works</p>	Needs review in light of undertakings	

General	TfL	requirements for cyclist and pedestrian safety improvements, which will include: (i) the assessment and identification of highway junctions, cycle paths, footways or roads that require safety improvement works along routes to be used by traffic for the purposes of the HS2 Works; and (ii) measures to ensure the provision of the safety improvement works identified pursuant to clause 7.2.2(d)(i);	Safety management of vulnerable road users will need to be considered holistically through driver and vehicle safety standards, the layout or formation of new accesses, layout of temporary traffic management and measures to ensure cleanliness of roads around worksites. A number of these issued have been responded to above. Highways safety is to be specifically considered by Highways Authorities as a result of consultation, or determination of a number of consents specifically required under the Highways Schedule 4 to the Bill. In particular <ul style="list-style-type: none">• ‘Prejudicial effects on road safety or on the free flow of traffic in the local area’ is a consideration, amongst other grounds, for highways and planning authorities under Schedule 4, Part 1, Highway Accesses – where approval of plans and specifications is required.• The purpose of consultation under Schedule 4, Part 3, where the Nominated Undertake will interfere with a Highway listed in Table 3 of Schedule 4 is to ‘ensure public safety and, so far as reasonably practicable, to reduce public inconvenience.• Where temporary interference is required on a road not listed in Table 3 of Schedule 4, consent is required and public safety or convenience can as far as a authority may reasonably require, be a condition of such consent.• Permanent highways to be constructed or altered must be completed to the reasonable satisfaction of highway authorities. (Schedule 4, Para 10)• Where permanent highway construction or realignment constitutes or comprises a carriageway, it must be carried out in accordance with plans and specifications approved by the highways authority. (Schedule 4, Para 10)• In their consideration of lorry routes approvals under Schedule 16,	Needs review in light of undertakings	
General	TfL	Controls to regulate the parking on the highway of vehicles operated for the purposes of or in relation to the HS2 Works;	HS2 construction vehicles must obey any parking restrictions, waiting periods, loading/unloading restrictions in the same way as any other vehicle and therefore no further commitment is needed.	Needs review in light of undertakings	
General	TfL	requirements for the development of lorry management plans, the contents of which are to be consulted upon and agreed with TfL, and which must include measures in relation to the timetabling, arrival and departure of vehicles operated for the purposes of or in relation to the HS2 Works at construction sites;	Measures to control lorries will be both route wide and site specific. The Promoter has already said it will consult on route-wide measure in the Route-Wide Traffic Management Plan. In addition the promoter is considering changes to the draft CoCP that will further address some the issues raised. Hours of site operation have been specified already in the draft CoCP with a start-up and shut-down period also being identified. Therefore the majority of construction sites can expect vehicle movements from 7am to 7pm. The current CoCP already contains a commitment that site specific traffic management measure that will include, as appropriate: “a list of roads which may be used by construction traffic in the vicinity of the site including any restrictions to construction traffic on these routes, such as the avoidance of large goods vehicles operating adjacent to schools during drop off and pick-up periods” The promoter has also set out the expected traffic impacts from HS2 construction work and is bound by the EMRs to not exceed the significant environmental impacts that have been stated. Also, should the relevant planning authority opt to become a qualifying authority under the planning regime established by Schedule 16 to the Bill they will have to approve lorry routes to and from sites with more than 24 vehicle movements per day. Given the obligations already imposed on the nominated undertaker through the EMRs and Schedule 16 to the Bill the Promoter does not agree that lorry management plans are necessary and therefore will not produce them.	Needs review in light of undertakings	

General	TfL	the principle that in so far as reasonably possible, the use of existing highways, accesses and rights of way will be maintained and where any interference is necessary due to the HS2 Works, that interference will be minimised in terms of its extent and length of time;	In summary, the general approach is to ensure that reasonable pedestrian access to premises abutting the highway is maintained. This will include where reasonably practical a consideration of access for disabled people. Additionally, where reasonably practical, vehicular access will be maintained. The approach is set out in Information Paper D11. In addition the draft CoCP contains an existing provision, which will remain that: “During construction works, the nominated undertaker will require that the impacts from construction traffic on the local community (including all local residents and businesses and their customers, visitors to the area, and users of the surrounding transport network) are minimised by its contractors where reasonably practicable.”	Needs review in light of undertakings	
General	TfL	the development and agreement with TfL and other highway authorities of traffic management plans to reduce the impacts of increased traffic flows caused by the carrying out of the HS2 Works and associated traffic disruption;	The promoter maintains that these do not need to be agreed. Parliament will have established the acceptable impacts set out in the Environmental Statement. The obligations placed on the nominated undertaker already ensure that appropriate Traffic Management Plans will be prepared. That said, in response to comments from highway authorities and TfL the Promoter is preparing changes to the draft CoCP which will ensure highway authorities will be consulted on traffic management plans on both a routewide and local basis. These documents, as well as site specific consenting matters under Schedule 4 provide the highway authorities with sufficient opportunity to ensure that impacts created by the scheme can be reduced further where reasonably practicable.	Needs review in light of undertakings	
General	TfL	measures to ensure that routes over which vehicles (other than vehicles operated for the purposes of or in relation to the HS2 Works), cyclists and pedestrians are diverted for the purposes of the carrying out of the HS2 Works are of a standard that is no worse than the route from which those vehicles, cyclists or pedestrians have been diverted; and	The promoter is not able to commit to this requirement. For those highways listed in Table 3 in Part 4 of Schedule 4, the nominated undertaker must consult with the highway authority prior to undertaking temporary interference. For other highways, the nominated undertaker must obtain consent from the highway authority (which must not be unreasonably withheld), subject to any conditions reasonably required in the interest of public safety or convenience.	Needs review in light of undertakings	
General	TfL	measures to ensure continuing access for persons with restricted mobility to services and buildings and the provision of alternative safe routes for those persons where existing accesses are interfered with by or in relation to the HS2 Works;	The promoter considers that Information Paper D11 contains text that addresses these concerns: “6.2. The nominated undertaker will ensure that people with restricted mobility continue to have access to services and buildings where such access and services are temporarily disrupted during the HS2 construction works. 6.3. Where the normal means of access must be diverted or blocked off, alternative safe routes for wheelchair users and ambulant disabled persons will be identified, taking into account existing hazards and obstructions such as pavement kerbs and lamp-posts. 6.4. Where particular difficulties are identified, arrangements will be made on a case by-case basis.”	Needs review in light of undertakings	
General	TfL	regular consultation and liaison with TfL and other highway authorities in relation to the carrying out of the HS2 Works;	The promoter would expect that regular Traffic Liaison Groups (TLGs) would be held for individual highway authorities or other suitable groups of authorities. TfL would be invited to such meetings in London. Proposals for the areas for TLGs (and their initial terms of reference, frequency of meeting and membership which can be adjusted to suit local circumstances) will be consulted on via the Highways Sub Group to the Planning Forum. Information Paper E13 contains further commitments regarding consultation, including that of Traffic Liaison Groups.	Needs review in light of undertakings	

General	TfL	measures to reduce the energy requirement for and carbon footprint of the HS2 Works and vehicles operated for the purposes of or in relation to the HS2 Works;	<p>HS2’s Sustainability Policy states the aim to “minimise the carbon footprint of HS2 as far as practicable and deliver low carbon long distance journeys that are supported by low carbon energy”. HS2 has also adopted a Carbon Minimisation Policy which, as stated in Information Paper E10: Carbon, sets out the commitment to develop and apply a carbon management strategy which will:</p> <ul style="list-style-type: none">• calculate the carbon footprint of the Proposed Scheme and use this as a tool to assess the potential to reduce carbon across the design, construction and operation phase;• consider low carbon options in developing the detailed design of the Proposed Scheme;• reduce embedded carbon in construction materials and carbon emissions from construction works, where practicable;• reduce energy requirements of the scheme and maximise the energy efficiency of operations, if practicable;• use and/or generate low carbon energy, if practicable; and• sequester carbon, if practicable. <p>This approach forms a hierarchy of actions, with avoidance generally being the most preferable option. The carbon footprint will be calculated at appropriate intervals to determine progress in carbon reduction.</p> <p>The promoter is however proposing to make changes to the CoCP that it considers will address the concerns TfL have raised. The precise wording of such a change has yet to be finalised but it is expected to require Carbon management plans with measures which accord with the carbon minimisation policy.</p>	Needs review in light of undertakings	
General	TfL	requirements in relation to the emissions from plant, vehicles and equipment operated for the purposes of or in relation to the HS2 Works, including: (a) the monitoring of those emissions; (b) the specification of emission standards; and (c) measures to ensure vehicles are routed and plant and equipment is located away from sensitive receptors; and	<p>The Environment Protection Act 1990 gives duties and powers relevant from emissions to worksites to Local Authorities and London Boroughs, and not to transport authorities such as Transport for London. A forum exists (the Environmental Health sub-group of the planning forum) to discuss such provisions across the whole route, to incorporate them in the Code of Construction Practice.</p> <p>Further to this, the Environment Protection Act 1995 also gives powers and duties to Local Authorities/London Boroughs in respect of Local Air Quality.</p> <p>As a policy, developed through discussions with the GLA, HS2 Ltd has made a commitment as follows, applying to the whole route, and published in Information Paper E13, ‘Management of Traffic During Construction’ on the 10th May 2015: ‘in order to mitigate impacts on Local Air Quality, in areas where there is action in place to meet EU limit values through the introduction of Low Emission Zones (such as the London Low Emission Zone), Heavy Duty Vehicles entering these designated Zones during construction, for the purposes of transporting excavated material, shall be powered by EURO VI (or lower emission) engines.’ Should the relevant planning authority opt to become a qualifying authority under the planning regime established by Schedule 16 to the Bill will have to approve lorry routes to and from sites with more than 24 vehicle movements per day.</p>	Needs review in light of undertakings	
General	TfL	requirements in relation to the monitoring and control of dust caused by or due to the HS2 Works.	The CoCP contains measures relating to the control of dust and air quality monitoring. Further to this at the last meeting of the Environmental Health Sub-Group to the Planning Forum HS2 is undertaking further work to prepare an Air Quality Strategy. The output of this work will be discussed at the Sub-Group.	Needs review in light of undertakings	
15. Waste and materials					

General	LA's - Planning Forum	The LAs should be consulted on the detailed mass haul plan as this is a key input to mitigating impacts in the Transport Assessment. It should aim to maximise the use of internal routes, and of rail and canal transport.	Not a CoCP issue	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
General	LA's - Planning Forum	The CoCP should acknowledge that relevant planning permissions will be needed for the disposal of waste material off-site at suitably proximate locations. It cannot be assumed that these will be forthcoming or that the hours of opening will facilitate night- time or weekend disposal.	Reference to a 'suitably permitted disposal locations' or equivalent wording. 15.2.18 /15.2.9 covers this - suggest no wording change.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
15.1 - Waste Management - General Provisions	LA's - Planning Forum	The CoCP does not appear to give consideration to minimising the amount of primary aggregates required. It does refer to working towards a "cut and fill balance in relation to excavation and tunnelling arising" in paragraph 15.1.1 in order to reduce waste arising, but does not give detail on how the use of natural resources would be reduced i.e. the sourcing and use of secondary aggregates where possible, in line with the principles of sustainable resource management.	not CoCP issue.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
15.1	LA's - Planning Forum	No mention is made of the potential sterilisation of mineral resources and what measures would be taken to ensure that mineral resources are not sterilised through the construction of the line.	Covered in land quality section of ES and under section 11 land quality section 11.2.2	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
15.1	LA's - Planning Forum	There is no mention of sustainable placement in the CoCP. Given that this approach will have significant negative impacts on the landscape, measures and standards must be in place to ensure impacts are reduced as much as possible.	Environmental impacts covered in relevant sections of CoCP (in reference to general earthworks, not sustainable placement as such	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
15.2.4	LAs - Planning Forum	NEW COMMENT FROM LA'S - DECEMBER 2015		The requirements of this paragraph should refer to the requirements of paragraph 15.2.19 where authorisation is given for off-site disposal or reuse.	
15.3.3 - Monitoring	LA's - Planning Forum	This register should be supplied to the relevant officer within the LA for the Annual Monitoring Report purposes.	No change to CoCP - EA will have access to the data and be the statutory body	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
16. Water resources and flood risk					
General	Planning Forum	There appears to be an assumption that flood risk should be managed as practicably as possible. However, LAs expect such a large national scheme to be providing betterment where appropriate for any temporary works and ultimately the permanent designs.	Not a CoCP issue - design?	Where would this be covered by design?	
General	Planning Forum	Prior written consent will be required from the Lead Local Flood Authority (LLFA) for any works affecting flow within an Ordinary Watercourse under Section 23 of the Land Drainage Act 1991. This includes any culverting. There is an assumption within the CoCP that the principle of culverting is acceptable. Culverts have adverse impacts on watercourses by increasing flood risk, removing natural banks and bed and the interaction with ground water. LAs will only accept the use of culverts for any necessary access, both temporary and permanent. We would expect a hierarchy approach to be undertaken first opting for an open span bridge, then a box culvert if this is not possible to ensure the capacity of the channel is maintained and to allow mammals to pass through.	Subject to approval under Hybrid Bill - confirm with TD water specialists 16.1.1 -mention of 'obtain appropriate approval for works...'	For all works affecting Main River Watercourse the Environment Agency must be consulted. Can this be revised to suggest what appropriate approvals are?	

General	Planning Forum	The LLFA is expected to become the SUDS approval body from 2014. It is therefore important that any proposals are discussed early and include any planning proposals to ensure both the Planning Applications and SUDS approval are assessed in tandem to avoid any delays.	Not a CoCP issue - design?	<p>"Inclusion of SuDS for major planning applications are now a material planning consideration since April 2015. In Camden surface water drainage and SuDS are to be designed in accordance with London Plan policy 5.13.</p> <p>This is relevant to the CoCP, because it's important that care is taken during construction not to silt up SuDS systems before they are connected up to the drainage system to ensure they work as intended and attenuate the correct volume of water. We'd suggest that reference is made to the working methods that will be employed to achieve this in the CoCP."</p> <p>NON-STATUTORY TECHNICAL STANDARDS, Best Practice Guidance, LASOO See section on 'Designing for Maintenance considerations' and 'Construction'</p>	NON-STATUTORY TECHNICAL STANDARDS, Best Practice Guidance, LASOO See section on 'Designing for Maintenance considerations' and 'Construction'
16.1.2	Planning Forum	Surface water should be managed sustainably for both the temporary works and permanent design, discharging to ground where possible, if not to the nearest watercourse in line with best practice taking all necessary measures to ensure run-off rates and volumes are not increased for all rainfall events up to and including the 1 in 100 year event including climate change in line with the NPPF.	Temporary discharge during construction works would be subject to statutory approval through discharge consents etc.	NO FURTHER COMMENT FROM LA'S - DECEMBER 2015	
General	Planning Forum	The CoCP should specify that all available evidence bases will be used for the baseline investigations including the Districts' SFRA's, the LLFA's Local Flood Risk Management Strategy, County Strategic Flood Risk Assessment, Preliminary Flood Risk Assessment and Surface Water Management Plans. Evidence should also be used from the River Basin Management Plans associated with the EU Water Framework Directive and Catchment Management plans for both the Thames Region and Anglian Region. Within identification of resources- include reference to the need to identify unmarked ditch line which is not present on OS maps	Not a CoCP issue	Where would this be covered?	
16.2 - Measures to reduce impacts to water resources	Planning Forum	A range of sustainable drainage measures should be provided using a hierarchy approach by first using above ground storage measures and above ground conveyance measures. LAs will not accept the use of existing water bodies for the management of surface water due to the requirement that these features need to be engineered correctly and should be offline from any existing water body, to avoid pollution of existing water bodies and changes in morphology.	Not a CoCP issue	Where would this be covered?	
16.2	Planning Forum	The LEMPs for each of these measures should ensure they are site specific, taking into account the local hydrology, geology, ground water levels, existing watercourses, overland flow routes and floodplain. LAs expect the LEMPs to include the same information that would be expected within an FRA to support a planning application. Within this it should identify where consents will be required and the relevant authority and a schedule of works including a timescale.	Not a CoCP issue	Where would this be covered?	
16.2	Planning Forum	As these works will be undertaken over a long period of time, the LEMPs should be reviewed on at least an annual basis to ensure any updates in flood data, legislation and policies are taken into account.	Noted	Don't understand what noted means in this circumstance. Is this a commitment to do this?	

16.3.3 - Measures to reduce potential flood risk impacts	Planning Forum	<p>NEW COMMENT FROM LA'S - DECEMBER 2015</p> <p>LBC suggested wording: The contractors will obtain copies of Lead Local Flood Authority's Flood Risk Management Plans and prepare site specific flood risk management plans for those areas of the site at risk of flooding. These would include all areas within Flood Zone 3 and areas considered at "more" risk of flooding on the EA's surface water flood map or any additional mapping produced by the LLFA.</p>		<p>The revised draft does not include reference to additional mapping carried out by the LLFA - Many LLFAs, including camden have built upon the EA surface water flood map to more accurately understand the risk. HS2 should refer to the most up to date mapping available.</p> <p>The contractors will obtain copies of the relevant regulatory bodies' flood risk management plans, maps and strategies and prepare site specific flood risk management plans for those areas of the site at risk of flooding. These site specific flood risk management plans need to be compliant and produced in accordance with the appropriate Flood Risk Assessments. These plans would include all areas within Flood Zone 3, areas considered at more risk of flooding on the EA's surface water flood map or any additional mapping produced by the LLFA and areas susceptible to groundwater flooding. Other flood risk sources, such as sewer flooding and areas at risk of reservoir flooding, will also be considered to ensure all sources of flooding are addressed appropriately.</p>	<p>The contractors will obtain copies of the relevant regulatory bodies' flood risk management plans, maps and strategies and prepare site specific flood risk management plans for those areas of the site at risk of flooding. These site specific flood risk management plans need to be compliant and produced in accordance with the appropriate Flood Risk Assessments. These plans would include all areas within Flood Zone 3, areas considered at more risk of flooding on the EA's surface water flood map or any additional mapping produced by the LLFA and areas susceptible to groundwater flooding. Other flood risk sources, such as sewer flooding and areas at risk of reservoir flooding, will also be</p>
16.3.4 - Measures to reduce potential flood risk impacts	Planning Forum	<p>If materials are stocked in the floodplain (flood zone 3) compensatory capacity must be provided elsewhere nearby.</p>	<p>Materials will not be stocked in the floodplain</p>	<p>The revised draft is not as definitive as the HS2 comment (left). See suggested alternative wording to substantiate HS2's comment that materials will not be stocked in the floodplain (zone 3).</p> <p>Where practicable, Contractors should avoid locating temporary structures, such as accommodation and stockpiles, and the placing of construction equipment within Flood Zone 3 areas or areas at significant risk of flooding from other sources.</p>	<p>Where practicable, Contractors should avoid locating temporary structures, such as accommodation and stockpiles, and the placing of construction equipment within Flood Zone 3 areas or areas at significant risk of flooding from other sources.</p>
16.4.2 - Monitoring	Planning Forum	<p>Details of the baseline data would be required such as geographical location so the RMAs can compare to their expected results.</p>	<p>Not clear on why they would require baseline data (Risk Management Authroity)??</p>	<p>NO FURTHER COMMENT FROM LA'S - DECEMBER 2015</p>	