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"3 Obligations in relation to the Programme (i) The Programme and its Deficiencies"

1.1 Defining the Programme

- 1.1.1 Reference is made to Slide No. 12.
- 1.1.2 The INTC 536 Estimate seeks to show the impact on the Programme of the matters referred in that estimate. It does that by impacting delays into the Infraco construction programme "Revision 1".
- 1.1.3 The graphic above depicts the six elements that actually constitute the Programme. The Estimate makes no attempt to consider the Programme as a single entity. It would appear that in the preparation of the Estimate the Infraco has elected to use the Infraco construction programme, in isolation, to conduct its analysis of the impact of the INTC on the Programme. This does not appear to be justifiable or legitimate.

1.2 Deficiencies in the Programme and Pre-requisites to Commencement

- 1.2.1 Reference is made to Slide No. 13.
- 1.2.2 The Employer's Requirements set-out a specification for the Programme. It requires the inclusion of many types of information that is most pertinent to the planning and programming for the timely delivery of the Infraco Works.
- 1.2.3 The graphic shown on Slide No. 13 indicates the type and amount of information that it typically required to plan, monitor and accurately project commencement of each group of on-site construction activities. Typically, only one or two of these pre-requisites are shown on the Programme. These are to be found in the Infraco construction programme element of the Programme. The absence of the further information that should be included in the Programme severely curtails the usefulness and meaningfulness of that programme, both as a management tool and as an essential element in the correct and proper operation of the contractual mechanisms associated with assessing delay and requirements for EoT.

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