

Modified Permit Scheme Proposals Consultation Report

Project: Proposed Permit Scheme Modification

Date: 30th November 2019

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Introduction

The formal consultation regarding the proposed modification to the Kirklees Permit Scheme ('KCPS') ran for a period of 30 working days beginning on the 11th October 2019. The deadline for receipt of responses was no later than 5pm on 22nd November 2019. It was stated in the consultation documents that 'all responses received by the 22nd November 2019 will be taken into consideration and, if Kirklees Council consider it to be appropriate, amendments will be made to the proposals.

Documentation and an accompanying covering letter was issued to 499 key stakeholder organisations, including local neighbouring Highway Authorities, Utilities, road user representative groups, current IT suppliers and non-government organisations. Some organisations had a number of consultees within them and if known those individuals were contacted directly.

A drop-in session was held on the 6th November for consultees to attend and discuss the proposals. This session was well received and 19 representatives attended. 22 comments on the proposals from 10 organisations were received by the deadline. Many of the comments were also copied to other Authorities who were undertaking this consultation simultaneously.

Where one or more Authority is named in the consultee comment received this has been changed to (the Authority). All the comments received have been included in this report to maintain consistency across Calderdale, Kirklees, Leeds, Sheffield and Wakefield. Any additional comments from consultants or legal representatives etc. have been added to the comment list so there is transparency regarding all changes to the scheme document. A list of comments received, and responses or amendments are provided in this document.

List of Consultees who responded by the deadline

1. Joint Authorities Group
2. City of Bradford Metropolitan District Council
3. North Yorkshire County Council
4. DfT
5. West Yorkshire Fire and Rescue Service
6. West Yorkshire Combined Authority
7. Openreach
8. Yorkshire Water
9. Severn Trent Water
10. Virgin Media

No responses were received after the deadline.

Consultees

Internal Departments

- Legal Services
- Environmental Health

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- People Services
- Planning

Central Government

- Department for Transport
- Environment Agency
- Highways England

Emergency Services

- West Yorkshire Fire Service
- West Yorkshire Police
- Yorkshire Ambulance Service
- South Yorkshire Fire & Rescue Service
- West Yorkshire Police

Passenger Transport

- Network Rail
- Passenger Focus

IT System Suppliers

- Mayrise (Yotta)
- Symology
- Highways England

Representative and Interest Groups

- JAG UK
- Approved Driving Instructors Association
- Automobile Association
- British Cycling
- British Motorcyclists Federation
- Freight Transport Association
- Guide Dogs Association For The Blind
- Road Haulage Association
- Royal Association For Deaf People (Rad)
- Royal Automobile Club
- Royal Blind Society
- Streetworks Uk
- In Focus Public Networks Limited
- BSL
- Jaguar Estates Ltd
- Safeplace Security Ltd
- Swift Argent
- Sigma

Surrounding Local Authorities

- Leeds City Council
- Wakefield Council
- Kirklees Council
- Sheffield Council
- West Yorkshire Combined Authority
- East Riding of Yorkshire Council

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- Lancashire County Council
- North Yorkshire County Council
- Derbyshire County Council
- Hull City Council
- Barnsley Metropolitan District Council
- A-One+
- Bradford Metropolitan District Council
- Oldham Council
- North Yorkshire County Council

Bus Operators

- First Group
- TJ Walsh
- West Yorkshire Combined Authority
- Yorkshire Tiger
- Arriva
- First
- BL Travel
- CR Plus
- First Bus
- Globe Holidays
- R & S Waterson
- Ross Travel
- Squarepeg Buses
- Stagecoach
- Tetleys And Yorkshire Tiger

Utility Companies

- BT Openreach
- 02 (Swann Services) 02 Tyco Electronics
- 02 Uk Ameen Utilities Ltd
- Amey (LG) Anglian Water
- Arqiva Ltd British Gas
- British Waterways Cable And Wireless
- BSKYB Telecommunications Services Ltd. Cityfibre
- Caip Ltd Clarke Telecom Mg012
- Clancy Docwra Ltd Clear Channel Uk
- Colt (Cs) Complete Energy Solutions Ltd
- Core Utilities E S Pipelines
- EE Energetics Gas Limited
- Energetics Energetics Warrington
- Energy Assests Networks Ltd Engie Regeneration Ltd
- Ericsson Limited ES Pipelines Ltd
- Fibrelay Utilities Ltd Fibrenation
- Fulcrum Pipelines Limited Future Network Solutions (Zp006)
- Future Utility Solutions Galliford Try
- Gamma Gauge Communications
- GBH Utilities GTC Pipelines

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- Harlaxton Energy Networks Harlaxton Engineering Services Ltd
- Instalcom KCOM
- Kingston Communications Morland Utilities Ltd
- Morrison Utility Connections N T Killingley
- National Electricity Transmission National Grid
- National Joint Utilities Group North Midland Construction
- Northern Gas Networks Northern Powergrid
- OBY Ltd Opal Telecom
- Orange Mansell Construction Power On Connections
- Powertech Utilities Limit RCD Utility Services Ltd
- Reading International Business Park Romec
- Severn Trent Water SSE
- SSE Datacom SSE Major Projects
- T-Mobile (Uk) Limited SSE Telecoms
- Telefonica (O2 (Uk) Limited) Trueform
- Verizon Business Virgin Media
- Vodafone Western Power Distribution
- Yorkshire Water Zayo Group Uk Ltd

Section 50s

- 77 K Limited
- Actavo
- A J Loveland Ltd
- Arcadis Consulting (Uk) Ltd
- Above Net/Jsm Construction – Zv
- AC Build Groundworks
- Alconex Infrastructure And Solutions Limited
- Alfa Site Services
- Alconex Infrastructure And Solutions Ltd
- Ashridge Contractors Ltd
- Andrew Hughes Utility Services Ltd
- Applebridge Construction Ltd
- Aps Surveying Services
- ARB Civil Groundworks Limited
- Aptus Utilities Ltd
- Athena Civil Engineering Ltd
- WHP
- Atena Civil Engineering
- Willmott Dixon Construction
- AQ Limited
- ARB Civil Engineers
- Athena Civil Engineering
- Ascent Engineering Ltd
- B Gallagher Construction Ltd
- Ashridge Contractors Ltd

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- Baldwin Building Services
- Athena Civil Engineering Ltd
- B.Jeffrey Construction
- B38 Projects Ltd
- Bemus Construction Services Ltd
- Balfour Beatty Regional Construction Ltd
- Bam Construction Ltd
- Bassetlaw Construction Service
- BDW Contractors Ltd
- BGS Ltd
- Browne Civil Engineering Ltd
- Bowmer & Kirkland
- Campbell Homes Ltd
- Bridgebank Ltd
- Clancy Docwra
- C&D Streetwork Ltd
- CET
- Cairn Cross Civil Engineering Ltd
- Carthy Contracting
- Calderdale Sewer Services
- Drainsaid
- Casey Construction Ltd
- Castle Construction
- Castle Construction
- CDC Draincare
- Castle Scaffolding
- Conlon Construction Ltd
- Centurion Traffic Management
- Core Special Projects Limited
- Connolly Broadley
- CTW Construction Ltd
- Interserve Construction
- Derek Lewis Ltd
- CPC Civils Ltd
- D&G Utilities Ltd
- CRS Plant Ltd
- East Coast Construction (Ne) Ltd
- D & G Utilities
- D Hare (Construction) Ltd
- D Noble Ltd
- D. Haigh & Co.
- Dale Storer
- Distribution Cable Jointing Ltd
- Darke Engineering Limited
- DB Drainage Ltd

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- Dean Construction And Groundworks
- Dewhurst Utility Services Ltd
- DMN Ltd
- Fairleigh Construction Lt
- Dobson Construction/Bullen Conservation Ltd
- Downing Construction
- DT Groundworks Ltd
- Future Utility Services Ltd
- Durkan & Sons Ltd
- E C Surfacing Ltd
- East Coast Construction
- Elison Construction Ltd
- Eco Windows
- Evans Builders And Civils Ltd
- Eric Wright Civil Engineering Ltd
- ESH Construction
- Evenfinish Northern Ltd
- Foxhall Construction Ltd
- Excalaon
- Freedom Group
- Field And Civil Engineering
- Galliard Homes Ltd
- Future Utility Solutions
- Galliford Try Building
- Gallagher Limited
- Hanna Civil Engineering
- Galliford Try House
- Gelder Group
- GBH Utilities
- Hacs Construction Ltd
- Geo Uk Limited
- Geo/Zayo
- Geocore Site Investigations Ltd
- Hannah Civil Engineering Ltd
- GSM
- GTC
- Hall Construction Services Ltd
- Heneghan And Sons
- Henry Boot
- Howard Civil Engineering
- Henry Boot Construction Ltd
- HMH Civils
- HH Construction Groundworks Contractors Ltd
- J. Wilson Contractors Ltd
- HH Construction Ltd

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- Howard Civil Engineering
- HP Construction Ltd
- Jack Elliott Groundworks
- Hughes Bros Limited
- Integrated Utility Services Ltd
- J Geraghty Limited
- J. Geraghty Utility Services
- Jaktó
- J.A Parker Contractors Ltd
- J. Murphy & Sons Limited
- Jagger Construction Services
- J.Blackmore Groundworks & Drainage
- JLES Northern
- Jackson Civil Engineering
- JC Decaux Uk Ltd
- JF Finnegan
- JFD Groundworks
- JFD Groundworks And Civils
- Jole Plant Hire Ltd
- JKL Leeds Ltd
- Megson Utilities Ltd
- Jole Plant Hire Ltd
- Key Utility Solutions Ltd
- JOM Construction Ltd
- Keepsake Construction Ltd
- JPC Utilities Ltd
- Linbrooke Services Ltd
- K Rouse Civil Engineers
- Lewis Haigh And Sons Ltd
- Kitchen Civils Ltd
- Klas Groundworks
- Lydon Contracting
- Marshall Construction (W.Yorks)Ltd
- M Raxter Civils Limited
- Maude Construction Ltd
- M. Gallagher Civil Engineer Ltd
- Manterfield Drilling Ltd
- M3 Groundworks Limited
- Onsite Central Ltd
- Magdalene
- R J Howard
- Matrix Network
- Merlin Utilities & Ground
- Maypole Manufacturing Ltd
- Moortown Construction

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- MCS Contracting
- Mears
- Moortown Group Ltd
- Morland Utilities
- Morland Utilities Limited
- R Haigh Groundworks
- MRB Building Services Ltd
- MW Maintenance Ltd
- National Energy Direct
- P Biddlestone Groundworks & Maintenance Ltd
- Northern Gas Networks
- Northern Powergrid
- Novate Solutions Ltd
- P Hughes Construction Ltd
- O'Donnell Civil Engineering Ltd
- O'Gorman Civils
- Oakfield Construction C Eng Ltd
- Oaklands Construction Ltd
- P & T Contracts York
- Peter Duffy
- P E Groundworks
- SCD Group Limited
- P N Daly Ltd
- Peter Duffy Limited
- Paul Dyson
- Pearl Developments S.York
- Perfect Pressure Limited
- RJ Howard Engineering Ltd
- Phelan Scaffold
- Sirius Civils (Yorkshire)
- Pipework Limited
- R O'Donnell Plant And Civil Ltd And Hb Tunnelling Ltd
- PWG Connections Ltd
- R B Altree & Co
- Rouse Homes Ltd
- Schofield Contracting Ltd
- S & E Copsey Groundworks Ltd
- S Eastwood Excavations & Contractors Ltd
- SCP Ltd
- SDH Services Project Ltd
- SDH Projects Ltd
- Shellmoor Civil Engineering Ltd
- Shanco Contracts Ltd
- Sirius Civils Ltd
- Smith Brothers Contracting

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- T Mobile - Turner & Townsend Plc
- South Yorkshire Tarmacadam Constructors Ltd
- Stephenson Construction (North)
- Stephenson's Civils
- Story Contracting Ltd
- Street Wise Civil Works
- T & K Gallagher Ltd
- Winvic Construction Limited
- Total Utility Connection
- Structural Soils Limited
- Termrim Construction
- Subscan Uds Ltd
- Sypte
- T&C Williams (Builders) L
- Torsion Group
- Termrim Construction Ltd
- Total Utility Connections
- TH Construction Uk Ltd
- Wallace Groundworks & Civils Ltd
- Toureen Contractors Ltd
- Watsons Groundworks Ltd
- Truvelo Uk Ltd
- Uk Diamond Drilling
- Twenty Twelve Civils Ltd
- Tyco Electronics
- Veolia Environmental Serv
- Verizon Business Ltd
- Vital Energi
- Whitelocks
- Vtesse Networks Ltd
- Warden Construction Ltd
- Watkin
- Whirlow Hall Farm Trust
- Westmoreland Civil Engineering Ltd
- A & R Construction
- Yorkshire Pro Paving + Groundworks Ltd
- Wilson Laidler & Co Ltd

Comments from Consultees

General Comments

Org	Suggested amendment / clarification / comment / question	Response / reply / recommendation
Joint Authorities Group	<p>Just a quick point as I read through these documents. Are you ditching the YCPS title and now going as (the Authority), reading it through it does not become clear and it does in the odd paragraph give differing impressions. Also you need to remove the name street manager as in the future if it changes you would need to amend the scheme, just use a term like changes in relation to the electronic management system and regulation. Your scheme would also need to be mindful of the proposed changes to the Coordination Code of practice.</p>	<p>The Authority is modifying the scheme so that it is a single scheme meeting the Authority needs but is still consistent with the wider Yorkshire Common scheme. The text is designed to convey this.</p> <p>Section 1.1 will be edited to remove ‘Street Manager’ from the final paragraph.</p>
West Yorkshire Fire and Rescue Service	<p>West Yorkshire Fire and Rescue Service have approximately 47,000 fire hydrants throughout Yorkshire. These are sited under covers in pavements and are outlet connections to the water mains for front line fire appliances. WYFRS service all hydrants periodically and we are already granted a period of grace if we need to stop a vehicle on the road to carry out a service. When a hydrant is defective we have to order a replacement through Yorkshire Water on whose water main they are sited. This ensures the correct response to maintain the capabilities of WYFRS in meeting our aim of improving community safety and wellbeing and reduce the risk to life, property and the environment from fire and other emergencies, should an incident occur requiring water for firefighting in (the Authority).area. This would also compliment the work and training both the council and the fire service currently aims towards as part of West Yorkshire Prepared (resilience forum) in mutual planning and training for collaborative working in the area (the Authority).</p> <p>The Yorkshire Water appointed contractors, on behalf of WYFRS, will need to excavate in the footpath or occasionally the road. The</p>	<p>Thank you for this clarification and making this important point.</p> <p>The Permit Authority also retains the option to waive or reduce fees at its discretion.</p> <p>All works carried in the highway can cause disruption and therefore need to be considered and coordinated. This requires staff time and cost.</p> <p>Works by Yorkshire Water will require a Permit and will be charged a corresponding fee unless it meets the criteria in section 11.3 of the scheme document.</p> <p>The Permit Authority also retains the option to waive or reduce fees at its discretion.</p>

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	<p>water company then re-charge the cost of the work and the proposed additional cost of the permit, to West Yorkshire Fire and Rescue Service. As the Permit Scheme is to be extended to all roads, it raises the prospect of the Council, who partly fund the Fire Service, recharging the fire service when paying permit scheme costs via Yorkshire Water. It would therefore seem sensible to ask if work being carried out by Yorkshire Water on behalf of West Yorkshire Fire and Rescue Service be exempt from permit costs. This is already the case within the Bradford area. If an assurance is required then the water company could provide the Council with the fire service order number.</p>	
West Yorkshire Combined Authority	<p>Ref 5.28 following discussions with Arriva we feel that any road that has 4 or more buses in either direction should be classed as significant in relation to the impact it would have on passenger numbers and disruption to route and service reliability. Could this be amended prior to implementation if possible? Thanks.</p>	<p>The DfT Code of Practice regarding Traffic Sensitive Streets relating to buses is a street that carries, in both directions, more than eight buses per hour.</p>
City of Bradford Metropolitan District Council	<p>The City of Bradford Metropolitan District Council fully supports the proposed transition of your permit scheme arrangements to all-streets, as we believe that this is the best method available to ensure both the continual improvement of utility behaviours and reductions in disruption that have already been successfully achieved across the region since the implementation of the initial Yorkshire Common Permit Scheme.</p> <p>Furthermore, the transition to all streets will ensure a consistent, unified approach in dealing with the challenges faced by Street Works Authorities on a daily basis.</p> <p>If there is any further assistance/advice we can provide relating to this matter following the introduction of our own all-streets scheme in June this year, please let me know and I will be happy to advise accordingly.</p>	<p>Thank you and thank for your offer of assistance or advice which is appreciated.</p>

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Cost Benefit Analysis

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Openreach	The DfT advice note for local highway authorities developing new or varying existing permit schemes, June 2016, states that unless there is a very strong benefit case otherwise, it is strongly recommended that permit fees are only applied to the more strategically significant roads: Category 1, 2 roads and Traffic Sensitive Street roads. This will mean that although permits would still be required for works on non-strategic routes, it should be very unlikely that these works would attract a permit fee. These permit applications would receive only 'notice' equivalent treatment by the authority. The application for and the issuing of a permit provides for additional overall improved network management.	<p>There is a strong business case for modifying the Permit Scheme and requiring Permits and fees for all streets.</p> <p>Across the modified schemes the Benefit to Cost Ratios ranged from 14:1 to 71:1. The modified schemes' societal benefit at a 5% reduction ranges from £250m to £2.5bn over 25 years.</p>

Fees and Discounts

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Openreach	Openreach accepts that in order for (the Authority) to be able to manage work on Street manager Category 3 and 4 streets need to be part of the permit scheme. However, Openreach do not support (the Authority) charging the maximum allowable fees across all streets.	Noted
Openreach	As a balanced view Openreach would support the increase in fees on strategically significant streets i.e. cat 0 -2 and traffic sensitive streets if this will help the authority cover the costs of running a permit scheme. Openreach however do not support the introduction of fees on the lower category of streets.	<p>Noted</p> <p>There is a strong cost benefit case for charging fees on all roads and employing additional staff to coordinate these permits.</p>
Openreach	By increasing the fee's to the proposed levels Openreach would have to seriously consider future projects for G-Fast and Superfast	Noted

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	Broadband rollout in (the Authority) to be not commercially viable. An alternative is for consumer prices to be increased to cover the increase in permit fees.	The Permit Authority also retains the option to waive or reduce fees at its discretion. A reduction may be applied where it is demonstrated that an activity provides significant economic benefit, for instance a network investment programme.
Openreach	Until now, (the Authority) have not charged for Cat 3 and 4 streets and Openreach do understand the rationale behind including these in the permit scheme but do not feel that there is justification for (the Authority) to go from not charging for these works to charging the maximum allowable.	The previous scheme did not require Permits for Cat 3 and 4 streets. The introduction of Permits on these streets will include the administration and coordination of these Permits increasing the resource requirements and associated costs that will be covered by the new fee structure.
Openreach	Openreach also note that the only discount (the Authority) applies that is not a legal requirement is the discount for collaboration, Openreach requests that (the Authority) undertake a review of their discounts and include some such as discounts relating to performance or where a statutory undertaker minimises the impact of their works.	The proposed fees policy is that fees will not be payable in the following circumstances; where several activity promoters are working within the same site and submit permit applications at the same time. The Permit Authority also retains the option to waive or reduce fees at its discretion. A reduction may be applied where it is demonstrated that an activity provides significant economic benefit, for instance a network investment programme.
North Yorkshire County Council	Just curious about your fees table for the scheme. I'm assuming that the Major works 4-10 days and up to 3 days is only where a TTRO is in place? Do these fees also apply to a TTRN? Do you still also charge the application fee and advertising for a TTRO on top of those fees? I'm asking because we just have 1 fee for Major works which is varied depending on the traffic sensitivity/ road category.	Major activities that are 10 days or less are those that have been identified in an activity promoter's annual operating programme or are normally planned, or known about at least six months in advance of the proposed start date for the activity; or, Require a temporary traffic regulation Order (i.e. not a temporary traffic notice) under the Road Traffic Regulation Act 1984 for any other activities other than immediate activities. TTROs are charges separately.

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Virgin Media	Virgin Media are disappointed that (the Authority) Permit Scheme and associated fee`s will apply to all classification of roads. Virgin Media requests that (the Authority) grant permits for category 3 and 4 roads by default. Virgin Media believes that coordination on these roads is deemed to be minimal and for those permits to be at zero fee levels.	Noted There is a strong cost benefit case for charging fees on all roads and employing additional staff to coordinate these permits.
Virgin Media	Virgin Media acknowledge that (the Authority) will be applying a 30% discount for working wholly outside traffic-sensitive times; however VM are disappointed that the authority chooses to charge the maximum fees on 3 & 4 non TS roads.	Noted There is a strong cost benefit case for charging fees on all roads and employing additional staff to coordinate these permits.
Virgin Media	Virgin Media acknowledges that (the Authority) will review their fees accordingly and surplus income will be invested into the scheme.	Noted

Scheme Document

Org	Section	Suggested amendment / clarification / comment / question	Response / reply / recommendation
Scheme Development Team		Updates to the document numbering and edits to section 7 regarding conditions have been discussed amongst the Permit Management Team, with the DfT and consultants.	Edits will be made and identified in the tracked change version of the scheme document.
Openreach	1.6	Openreach agree to the changes (the Authority) have made to the Permit Scheme, including the changes highlighted in Section 1.6.	Thank you
Severn Trent Water	Page 25 section 5.31	Severn Trent Water (STW) would like to thank (the Authority) for the opportunity to comment on their proposed new Permit Scheme. STW would like to highlight the following points for your consideration. Streets where early notification of Immediate Activities is required. – the document states” that activity promoters to contact the HA by telephone prior to carrying out any activity in any streets so designated “this by default is a	Streets requiring a phone call will be identified on the Gazetteer. It is for streets designated as requiring early notification and the text is for clarification of the requirement.

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		condition and is not one of the National Conditions allowed so cannot be enforced. STW respectfully request that this paragraph be removed by (the Authority) to remove any potential for future confusion on this subject.	
Severn Trent Water	Page 33 section 6.19	Application Period - the document states – “the Permit Authority requires early warning of immediate activities on these streets” this is again by default is a condition, but is not one of the National Conditions so cannot be enforced. Immediate activities need to have a Permit application within two hours of starting work or by 10.00 am the next working day. STW respectfully request that this paragraph be removed by (the Authority) to remove any potential for future confusion on this subject.	This is an operational requirement of the scheme.
Severn Trent Water	Page 47 section 7.20	Conditions & Statutory Requirements for Immediate Activities – the document states “ Portable traffic signals will be controlled manually during traffic sensitive times as stated on the local street gazetteer” This is a carte blanche statement. The DFT have stated to all the HAUC’s that all the legislation around this subject states that manually control should be used in line with the relevant legislation and on a case by case bases with the HA clearly explaining the reasons/ expectations of what they require to be achieved, not a carte blanche statement. Relevant legislation states VA is the first option unless special requirements are required and explained by the HA. STW respectfully request that this paragraph be removed or amended to reflect these points by SCC, thus removing any potential for future confusion on this subject.	Section 7.20 relates to immediate activities. This is requirement for immediate activities if stated in the gazetteer. Immediate activities are undertaken before a permit is applied for and considered by the Authority.
Severn Trent Water	Page 62 section 13.7	the last paragraph of this section is not in line with the Immediate Activity notification requirements so cannot be enforced. STW respectfully request that this paragraph be removed by (the Authority) to remove any potential for future confusion on this subject.	The text relates to immediate activities which are undertaken before a permit is applied for and considered by the Authority.

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DfT	7.9 Issuing Permits and Response Time	The Permit Authority will issue permits electronically using the formats in the current electronic means. Format maybe? Bit clunky.	Noted and agreed. 7.9 will be edited for clarity.
DfT	11.1 Introduction	(The Authority) has set its permit fees in accordance with the Traffic Management Act 2004 Permit Fees Guidance published by DfT in July 2008 and in accordance with the Revised Fee Structure contained in the Additional Advice Note published by the DfT in January 2013. In 2015 the 2008 documents were withdrawn, it's in the 2015 statutory guidance (or at least it will be in the 2020 one!!!).	Noted thank you. 11.1 will be edited.
DfT	7.13 7.16 7.17	<p>7.13 Traffic Management Provision.....be sufficient. The Permit Authority may require traffic management conditions, for instance:</p> <ul style="list-style-type: none"> • That the road, or relevant section, should be closed to traffic during the works under Section 14 of the Road Traffic Regulation Act; • That shuttle working and/or portable traffic signals are to be used. <p>This type of condition will be discussed with the activity promoter to reach agreement and ensure that any conditions allow activities to be undertaken in accordance with existing statutory codes and guidance such as Safety at Street Works and Road Works. It is possible that traffic management arrangements will change during the course of the activity. If so this must be explained in the application and if it is considered necessary, these changes will be included in the conditions. A condition may also be included that the promoter must notify the Permit Authority before such changes take place so that the Permit.</p> <p>7.16 Environmental Conditions. The Permit Authority may require environmental conditions, where appropriate. These may</p>	The scheme document will be reviewed in its entirety in the future and this can be simplified and clarified then.

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		<p>include, but are not limited to, restrictions on hours of work in residential areas to reduce noise, or conditions to protect wildlife. The Permit Authority will provide full information to the activity promoter, at the earliest opportunity, if such conditions are relevant to allow for them to be included in the permit application. Any environmental conditions required will be with the express consent of those responsible for such matters within the local authority area.</p> <p>7.17 Supplementary Conditions. In addition to the conditions set out above the following conditions may also be required on a permit application and should be considered by the activity promoter when submitting an application. This all read a little odd. There is the statutory conditions as set out in the 2015 statutory guidance (15 March 2015) and that is it – nothing else is a permit condition and capable of attracting an f.p.n under the regulations. Tweak maybe to reflect same?</p>	