

Title: **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 Calderdale Permit Scheme ('CCPS') 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 Calderdale 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
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
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	Ameon 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
Fibreplay Utilities Ltd	Fibrenation
Fulcrum Pipelines Limited	Future Network Solutions (Zp006)

Future Utility Solutions	Galliford Try
Gamma	Gauge Communications
GBH Utilities	GTC Pipelines
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	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 Streetworks 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
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	Howard Civil Engineering
HP Construction Ltd	Jack Elliott Groundworks
Hughes Bros Limited	Integrated Utility Services Ltd
J Geraghty Limited	J. Geraghty Utility Services
Jakto	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 Utilitiy 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
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	T Mobile - Turner & Townsend Plc
South Yorkshire Tarmacadam Constructors Ltd	Stephenson Construction (North)
Stephensons Civils	Story Contracting Ltd
Street Wise Civil Works	T & K Gallagher Ltd
Winvic Construction Limit	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

Org	Section	Suggested amendment / clarification / comment / question	Response / reply / recommendation
General Comments			
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 water company then re-charge the cost of the work and the proposed additional</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>

		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.	The Permit Authority also retains the option to waive or reduce fees at its discretion.
West Yorkshire Combined Authority		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.	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.
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>	Thank you and thank for your offer of assistance or advice which is appreciated.
Cost Benefit Analysis			
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	There is a strong business case for modifying the Permit Scheme and requiring Permits and fees for all streets.

		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.	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.
Fees and Discounts			
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.	Noted There is a strong cost benefit case for charging fees on all roads and employing additional staff to coordinate these permits.
Openreach		By increasing the fee's to the proposed levels Openreach would have to seriously consider future projects for G-Fast and Superfast 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.	Noted 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		<p>Openreach also note that the only discount (the Authority) apply 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.</p>	<p>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.</p> <p>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.</p>
North Yorkshire County Council		<p>Just curious about your fees table for the scheme.</p> <p>I'm assuming that the Major works 4-10 days and up to 3 days is only where a TTRO is in place?</p> <p>Do these fees also apply to a TTRN?</p> <p>Do you still also charge the application fee and advertising for a TTRO on top of those fees?</p> <p>I'm asking because we just have 1 fee for Major works which is varied depending on the traffic sensitivity/ road category.</p>	<p>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,</p> <p>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.</p> <p>TTROs are charges separately.</p>
Virgin Media		<p>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.</p>	<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>

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			
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 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.	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.
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.
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	7.13 Traffic Management Provision.....be sufficient. The Permit Authority may require traffic management conditions, for instance: <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. 	Noted thank you. There is a desire to maintain consistency with the common scheme so this text has not been changed from the current common document.

		<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.</p> <p>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 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.</p> <p>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>	<p>The scheme document will be reviewed in its entirety in the future and this can be simplified and clarified then.</p>
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