Newcastle City Council Permit Scheme Consultation Report

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| **Ref** | **Company** | **Section** | **Page Number** | **Comment** | **Response** | **Scheme Amended** |
|  | DfT | 1.1 | 8 | 1.1 The above would apply to any wording around condition use and the March & October 2015 Statutory Guidance etc. | Recommended changeDue regard has also been had to the Statutory Guidance for Highway Authority Permit Schemes October 2015 as well as the Statutory Guidance for Highway Authority Permit Schemes – Permit Scheme Conditions March 2015 and their successors. | Amended |
|  | DfT  | 1.7 | 9 | 1.7 Your document refers to parity as an objective for the scheme, but it is requirement under regulation 40 | Newcastle City Council will remove this objective | Amended |
|  | DfT  | 7.4 | 25 | 7.4 covers EToN. HAUC England has issued wording for the use of *existing* schemes to cover the introduction of Street Manager but it would be better if new schemes future proofed their documents from the outset. Obviously, we will not know which date will be used for the introduction of SM until the Government response to the consultation that closes 13 September   | 7.4 references all applications must comply with the definitive format and content given in the current EToN Technical Specification and **or its successors** and therefore, is futureproofed. | No changes  |
|  | DfT  | 11.1 | 37 | 11.1 You refer to the March 2015 statutory guidance for your conditions but again you may wish to consider future proofing your document to reflect that following the outcome of the consultation there may be some changes to the regulations and the statutory guidance, in which case it will no longer be the March 2015 document. | Amended to refer to “and its successors” | Amended |
|  | DfT  | 16.10 | TBC | It would help if the document was future proofed to take into account of the updating taking place of the Co-Ordination Code of Practice.  | Amended to refer to “and its successors” | Amended |
|  | Virgin Media | General | General | **Question 1****Do you consider that the permit scheme is suited to the needs of the people, residents and road users of Newcastle Council?**No **If not why not?**Virgin Media are disappointed that the Permit Scheme and associated fee`s will apply to all classification of roads. If the council chooses to apply permits to 100% of streets, contrary to advice from Ministers, Virgin Media requests that Newcastle City Council grant permits for category 3 and 4 roads by default and for those permits to be at zero fee levels | Newcastle City Council does not believe the scheme is contrary to ministers’ advice. An authority should have the power to control activities, including its own on all streets and believes that activities on type 3 & 4 roads are just as important to the roads users as those on 0, 1 and 2. The application of a permit scheme and the tasks associated with that should be cost neutral. Given the volume of notices processed in 2018/19 for type 3 & 4 streets (on which our matrices have been based) to charge a zero fee would not allow for the scheme to be cost neutral. Regulation 30 provides the PA with the power to charge for permits. The DfT permit fee matrix has been used to determine the allowable costs and therefore the permit fee by works type and road category. The annual evaluations will determine whether the costs of running a scheme have been covered and fees may be adjusted either up or down to ensure the scheme remains cost neutral.  | No changes |
|  | Virgin Media | General | General | **Question 2****Do you think that the permit scheme reflects the requirements of the Statutory Guidance for permit Schemes and the Statutory Guidance regarding Permit Scheme Conditions?**Yes | Noted | No changes |
|  | Virgin Media | General | General | **Question 3****Do you thin that the permit scheme reflects the requirements of the Traffic Management permit scheme (England) Regulations 2007?**Yes | Noted | No changes |
|  | Virgin Media | General | General | **Question 4****Do you understand the conditions that can be applied in granting a permit?**Yes | Noted | No changes |
|  | Virgin Media | General | eneral | **Question 5****Do you understand the penalties for not applying for a permit and are they clearly identified in the scheme document?**Yes | Noted | No changes |
|  | Virgin Media | General | General | **Question 6****Do you understand the penalties for not complying with a permit condition and are they clearly identified in the scheme document?**Yes | Noted | No changes |
|  | Virgin Media | General | General | **Question 7****Do you agree with the monitoring and is it adequate?**Yes | Noted | No changes |
|  | Virgin Media | General | General | **Question 8****Are there any other aspects of the scheme for which you require further clarification?**If works continue beyond the end date of a permit, Virgin Media believe this would be classed as breach of permit condition, not working without a valid permit. | For clarification, this is treated as an overrun which constitutes a Section 74.  | No changes |
|  | Virgin Media | General | General | **Question 9****Do you have any suggestions for improving the scheme**?Virgin Media would suggest a monthly review meeting to be held every month for the first 3 months of a scheme to review issues encountered within the start-up period of the scheme and are happy for this to be a joint meeting with other undertakers, which we can review statistics on refusals, FPN’s etc, would this be of benefit to N.C.C? | Newcastle City Council will be happy to meet with utilities on a monthly basis for the first three months following implementation. This would also be an excellent opportunity to discuss lessons learned and share best practice.  | No changes |
|  | Virgin Media | General | General | **Question 10****Do you have any other comments on the permit scheme?**Again just to clarify as per Question 1, Virgin Media are disappointed that Newcastle City Council’s Permit Scheme and associated fee`s will apply to all classification of roads. If the council chooses to apply permits to 100% of streets, contrary to advice from Ministers, Virgin Media requests that Newcastle City Council grant permits for category 3 and 4 roads by default and for those permits to be at zero fee levels. | Council does not believe the scheme is contrary to ministers advice. An authority should have the power to control activities, including its own on all streets and believes that activities on type 3 & 4 roads are just as important to the roads users as those on 0, 1 and 2. The application of a permit scheme and the tasks associated with that should be cost neutral. Given the volume of notices processed in 2018/19 for type 3 & 4 streets (on which our matrices have been based) to charge a zero fee would not allow for the scheme to be cost neutral. Regulation 30 provides the PA with the power to charge for permits. The DfT permit fee matrix has been used to determine the allowable costs and therefore the permit fee by works type and road category. The annual evaluations will determine whether the costs of running a scheme have been covered and fees may be adjusted either up or down to ensure the scheme remains cost neutral.  | No changes |
|  | Openreach | General | General | **Question 1****Do you consider that the permit scheme is suited to the needs of the people, residents and road users of AUTHORITY Council?**Openreach understand the benefits that permit schemes may bring in enabling authorities to apply more resource to co-ordination of those activities with the potential to cause significant disruption on the highway.Openreach also fully support the need for utilities and authorities to work together to maximise efficiency and reduce disruption for the benefits of all  | Noted. | No changes |
|  | Openreach | General | General | **Question 2****Do you think that the permit scheme reflects the requirements of the requirements of the Statutory Guidance for Permit Schemes and the Statutory Guidance regarding Permit Scheme Conditions?** If NO, please clarify where in the document you feel it does not reflect? **Question 2****Do you think that the permit scheme reflects the requirements of the requirements of the Traffic Management permit Scheme (England) Regulations 2007?** A copy can be found here at http://www.legislation.gov.uk/uksi/2007/3372/contents/made If NO, please clarify where in the document you feel it does not reflect? In the statutory guidance for permit schemes the DfT have stated that the level of scrutiny carried out should be proportionate to the level of disruption, expecting a less rigorous approach on category 3 and 4 roads. It also states that in these circumstances’ fees should be waived or discounted | An authority should have the power to control activities, including its own on all streets and believes that activities on type 3 & 4 roads are just as important to the roads users as those on 0, 1 and 2. The application of a permit scheme and the tasks associated with that should be cost neutral. Given the volume of notices processed in 2018/19 for type 3 & 4 streets (on which our matrices have been based) to charge a zero fee would not allow for the scheme to be cost neutral. Regulation 30 provides the PA with the power to charge for permits. The DfT permit fee matrix has been used to determine the allowable costs and therefore the permit fee by works type and road category. The annual evaluations will determine whether the costs of running a scheme have been covered and fees may be adjusted either up or down to ensure the scheme remains cost neutral. | No changes. |
|  | Openreach | General | General | **Question 3****Do you think that the permit scheme reflects the requirements of the requirements of the Traffic Management permit Scheme (England) Regulations 2007?**Yes having looked through your document and legislation, your proposed permit scheme seems to reflect the requirements of the Traffic Management permit scheme | Noted | No changes |
|  | Openreach | General | General | **Question 4****Do you understand the conditions that can be applied in granting a permit?**Within the sections of your permit scheme including section 8,9 and 11 I understand the conditions | Noted | No changes |
|  | Openreach | General | General | **Question 5****Do you understand the penalties for not applying for a permit and are they clearly identified in the scheme document?**It is an offence to undertake works without a required permit under regulation 19, this information is clear within the document | Noted | No changes |
|  | Openreach | General | General | **Question 6****Do you understand the penalties for not complying with a permit condition and are they clearly identified in the scheme document?**Penalties are set down within your document clearly and look to be fair and within guidelines | Noted | No changes |
|  | Openreach | General | General | **Question 7****Do you agree with the monitoring proposed and is it adequate?** This conforms to what has been asked for within the legislation, Section 14 of your document is clear and sets out what is expected | Noted | No changes |
|  | Openreach | General | General | **Question 8****Are there any other aspects of the scheme for which you require further clarification?**No | Noted | No changes |
|  | Openreach | General | General | **Question 9****Do you have any suggestions for improving the scheme?**During the initial move of NYCC from notices to permits Openreach found it really useful to have meetings to go through what was going wrong on both sides. Especially in the first couple of months. Would your authority be willing to do this? | Newcastle City Council will be happy to meet with utilities on a monthly basis for the first three months following implementation. This would also be an excellent opportunity to discuss lessons learned and share best practice | No changes |
|  | Openreach | Various | Various | **Question 10****Do you have any other comments on the permit scheme?**2.3 Collaborative working Openreach do not agree that when sharing a trench that only the primary promoter will register the reinstatement regardless of who carried out the reinstatement. In this instance both promoters should submit a registration of reinstatement with the primary promoters’ subsumed by the secondary promoters.3.4 Activities for which no permit is required – works not involving excavation in non-traffic sensitive streets Openreach request that this is removed from the document, in some instances such as when traffic management is required, a permit would be required regardless of whether the works require excavation or are in a traffic sensitive street.7.18 Traffic Management, Parking and Traffic Regulation Orders Openreach request that ‘where the Council is prepared to do so’ is removed, TTRNs should only be requested in the most urgent situations and where a statutory undertaker can evidence the need for one then we would expect the Highway Authority help us with our request.Permit Scheme – 18.2 Permit Fee Payment and reconciliation. The scheme quotes:The Permit Authority will submit a draft invoice to the promoters for a specified period prior to the generation of an invoice to enable them to reconcile the charges. A two week timescale will be allowed for reconciliation of the charges prior to actual invoiceThis timescale is not really sufficient for us to check all the permits on a monthly list, our teams are dealing with approx. 55 Highway Authorities each team. If the draft charges presented by the Authority are all correct for discounts on Traffic Sensitive roads and zero charges for AIVs or Portable Traffic Signals then we could possibly make the two week deadline but invariably authorities send the initial report of their draft charges without filtering or checking it. This means our team have to check each individual line to confirm the charge is correct or if we need to challenge for incorrect charges. Please amend the timescale to 28 days giving us time to check the charges.Openreach request that Authorities present Permit draft charges on a monthly basis and in Excel spreadsheet format as the charges need to be uploaded to our system as a .csv file. Openreach are not able to convert PDF format into Excel spreadsheet or .csv format. Production of charges in Excel format will enable us to process these charges in a timely manner.Openreach request that the permit fees are reviewed taking into account the Statutory Guidance for Permit Schemes, ‘it is strongly recommended that permit fees are only applied to the more strategically significant roads: Category 1, 2 roads and Traffic Sensitive 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.’ Openreach accept that highway authorities need to recoup the cost of running the scheme from permit fee revenue, however we believe that the focus and the higher fees should be on category 0, 1, 2 and traffic sensitive roads. | 2.3This is industry standards in which Newcastle City Council will follow, no changes will be made 3.4 - This is industry standards in which Newcastle City Council will follow, no changes will be made 7.18 - It is the responsibility of the Council to consider whether a request meets the criteria for a TTRN and assess what disruption the works will cause on the network so therefore 'where the Council is prepared to do so' will remain in the document. Newcastle City Council will allow the industry standard of ten working days for the reconciliation of the charges prior to the actual invoice. Whilst extensions will be considered in exception circumstances, other authorities in the area work with the same processing times so no changes will be made to the procedureAn authority should have the power to control activities, including its own on all streets and believes that activities on type 3 & 4 roads are just as important to the roads users as those on 0, 1 and 2. The application of a permit scheme and the tasks associated with that should be cost neutral. Given the volume of notices processed in 2018/19 for type 3 & 4 streets (on which our matrices have been based) to charge a zero fee would not allow for the scheme to be cost neutral. Regulation 30 provides the PA with the power to charge for permits. The DfT permit fee matrix has been used to determine the allowable costs and therefore the permit fee by works type and road category. The annual evaluations will determine whether the costs of running a scheme have been covered and fees may be adjusted either up or down to ensure the scheme remains cost neutral. | No changesNo changesNo changesNo changesNo changes |
|  | NWL | General | General | **Question 1****Do you consider that the permit scheme is suited to the needs of the people, residents and road users of AUTHORITY Council?**Yes | Noted | No changes |
|  | NWL | General | General | **Question 2****Do you think that the permit scheme reflects the requirements of the requirements of the Statutory Guidance for Permit Schemes and the Statutory Guidance regarding Permit Scheme Conditions?** Yes | Noted | No changes |
|  | NWL | General | General | **Question 3****Do you think that the permit scheme reflects the requirements of the requirements of the Traffic Management permit Scheme (England) Regulations 2007?**Yes | Noted | No changes |
|  | NWL | General | General | **Question 4****Do you understand the conditions that can be applied in granting a permit?**Yes | Noted | No changes |
|  | NWL | General | General | **Question 5****Do you understand the penalties for not applying for a permit and are they clearly identified in the scheme document?**Yes | Noted | No changes |
|  | NWL | General | General | **Question 6****Do you understand the penalties for not complying with a permit condition and are they clearly identified in the scheme document?**Yes | Noted | No changes |
|  | NWL | General | General | **Question 7****Do you agree with the monitoring proposed and is it adequate?**Yes | Noted | No changes |
|  | NWL | General | General | **Question 8****Are there any other aspects of the scheme for which you require further clarification?**Please refer to Q10 | Noted  | No changes |
|  | NWL | Various | Various | **Question 10 Do you have any other comments on the permit scheme?**Sec 3.4 and Sec 4.5 - Do we need non-chargeable permits for works in private streets? If so, are timescales the same as these 2 points appear to contradict each other | A permit scheme can only be applied to roads that are maintained at public expense | No changes |
|  | NWL | Various | Various | **Question 10 Do you have any other comments on the permit scheme?**Sec 9.5 and Sec 9.6 – Both of these lead us to believe we can put through extensions electronically if more than 20% duration is remaining. However, we have been informed if we do this, regardless of stating the requirements set in the permit scheme, they will be refused. Is this your stance and if so, should this be amended so not to mislead? | Variations can take place at any time after the permit has been issued and before or during the activity itself. However as stated in 9.6 where the criteria in 9.5 is not met the promoter shall contact the Authority to ascertain whether they are prepared to grant the variation, then apply electronically. If the promoter requests a variation electronically before the 20% or 2 day window without contacting the Authority first this does not constitute grounds for the Authority to refuse. | No changesNo changes |
|  | NWL | Various | Various | **Question 10 Do you have any other comments on the permit scheme?**3.Traffic Management – do lights need manual control at peak times on all traffic sensitive routes? | No, however, there will be large percentage of locations which may require the lights to be operated manually, this should be discussed and agreed with the Authority. | No changes |
|  | NWL | Various | Various | **Question 10 Do you have any other comments on the permit scheme?**4.Gritting Routes – There appears to be no mention of charges on gritting routes when the weather is mild. Is it the case that the reason for a street designation as TS due to it being a gritting route, then should it be charged at the non TS rate when the weather is mild? | If an identified gritting route is for a number of months, then each day of said months will be designated traffic sensitive, regardless of the weather.  | No changes |
|  | NWL | Various | Various | **Question 10 Do you have any other comments on the permit scheme?**5.There are many references to the EToN specifications throughout the scheme. What will the implications if the introduction of Street Manager brings in procedures that are not aligned to the proposed Permit Scheme? | All references to Electronic Transfer of Notifications (EToN) in Newcastle City Council Permit Scheme documentation are followed up with reference to “and its successors” | Amended |
|  | NWL | Various | Various | **Question 10 Do you have any other comments on the permit scheme?**6.We expect that the document will become a legal one, if this is the case, would also expect that the document be in line with other regulations. In the scheme there is a reference to FPNs being “issued”, this is not in line with FPN Regulations whereby FPNs are “given”. Not sure if this should be amended before rather than after and then having to re-issue? | Noted. To be “given”, however, I must highlight it depends on the terminology you are using as the Statutory Guidance for Highway Authority Permit Schemes Regulation 21-28 Permit Authorities **issue** Fixed Penalty Notices. Street Works (Fixed Penalty) (England) regulations 2007 use the term “given” | No changes. |
|  | NWL | Various | Various | **Question 10 Do you have any other comments on the permit scheme?**7.Just 2 very minor points - that if this becomes a legal document the use of apostrophe throughout, should read FPNs not FPN’s.  | Recommended change FPNs  | Amended |
|  | Tyne and Wear Fire | Various | Various | Within Tyne and Wear Fire and Rescue Service (TWFRS) there are approximately 23,000 fire hydrants, which are routinely inspected on an 18 month inspection programme.  During an inspection, the Service Hydrant Technician will carry out any minor repairs.  If the technician is unable to repair the defective hydrant, as the defect requires major work which would require excavation, TWFRS will need to raise a purchase order to pay the Water Company for them to carry out the repairs.   With this in mind, could you please confirm if the above exemption will also cover works which TWFRS have instructed the Water Company to repair on our behalf?    | Permits will be required for all works that require an excavation. As these works will be undertaken NWL, they will be work promoter. | No changes |
|  | Northern Powergrid | General | General | **Question 1****Do you consider that the permit scheme is suited to the needs of the people, residents and road users of AUTHORITY Council?**Yes | Noted | No changes |
|  | Northern Powergrid | General | General | **Question 2****Do you think that the permit scheme reflects the requirements of the requirements of the Statutory Guidance for Permit Schemes and the Statutory Guidance regarding Permit Scheme Conditions?** Yes | Noted | No changes |
|  | Northern Powergrid | General | General | **Question 3****Do you think that the permit scheme reflects the requirements of the requirements of the Traffic Management permit Scheme (England) Regulations 2007?**Yes | Noted | No changes |
|  | Northern Powergrid | General | General | **Question 4****Do you understand the conditions that can be applied in granting a permit?**Yes | Noted | No changes |
|  | Northern Powergrid | General | General | **Question 5****Do you understand the penalties for not applying for a permit and are they clearly identified in the scheme document?**Yes | Noted | No changes |
|  | Northern Powergrid | General | General | **Question 6****Do you understand the penalties for not complying with a permit condition and are they clearly identified in the scheme document?**Yes | Noted | No changes |
|  | Northern Powergrid | General | General | **Question 7****Do you agree with the monitoring proposed and is it adequate?**Yes | Noted | No changes |
|  | Northern Powergrid | Various | Various | **Question 10****Do you have any other comments on the permit scheme?**9.8 Variations for immediate activities- bullet 2 states that promoters will telephone the permit authority to apply for a permit variation. This is incorrect, permit variations must be submitted electronically. | To avoid the risk that any variations may be missed during exceptionally busy periods, Newcastle City Council would request that all extensions are discussed via telephone and then confirmed electronically once agreed. The text in the scheme document has been updated to reflect this.  | Amended |
|  | Network Rail | General | General | **Question 1****Do you consider that the permit scheme is suited to the needs of the people, residents and road users of AUTHORITY Council?**Yes | Noted | No changes |
|  | Network Rail | General | General | **Question 2****Do you think that the permit scheme reflects the requirements of the requirements of the Statutory Guidance for Permit Schemes and the Statutory Guidance regarding Permit Scheme Conditions?** Yes | Noted | No changes |
|  | Network Rail | General | General | **Question 3****Do you think that the permit scheme reflects the requirements of the requirements of the Traffic Management permit Scheme (England) Regulations 2007?**Yes | Noted | No changes |
|  | Network Rail | General | General | **Question 4****Do you understand the conditions that can be applied in granting a permit?**Yes | Noted | No changes |
|  | Network Rail | General | General | **Question 5****Do you understand the penalties for not applying for a permit and are they clearly identified in the scheme document?**Yes | Noted | No changes |
|  | Network Rail | General | General | **Question 6****Do you understand the penalties for not complying with a permit condition and are they clearly identified in the scheme document?**Yes | Noted | No changes |
|  | Network Rail | General | General | **Question 7****Do you agree with the monitoring proposed and is it adequate?**Yes | Noted | No changes |
|  | Network Rail | General | General | **Question 8****Are there any other aspects of the scheme for which you require further clarification?**See Q10 | Noted | No changes |
|  | Network Rail | General | General | **Question 9****Do you have any suggestions for improving the scheme?**See Q10 | Noted | No changes |
|  | Network Rail | Various | Various | **Question 10****Do you have any other comments on the permit scheme?**1. Throughout document- references to EToN- DfT guidance is that new schemes should use the wording ‘by electronic means’- Network Rail would recommend that this is amended before publication
2. Page 22-S6.2 ‘unless other conditions have been met by pre-agreement with the authority’- Network Rail would ask for clarification on what this means as there should be no conditions that are not NCT’s?
3. Page 39 S12.5-‘However, as per DfT guidelines, may be subject to reduced fees for no Traffic Sensitive Roads or in Non Traffic Sensitive times- Network Rail would ask for clarification of this statement. Will the Authority be offering the 30% discount for working outside traffic sensitive times as is the Industry Standard?
4. Page 37 S12- Network Rail would ask to be exempted from Permit Fee charging as we are a government funded organisation and the payment of permit fees is moving tax payers money from one organisation to another.
5. Page 44 S16.5- Network Rail would ask that it is included in this section that we would should be contacted if works are within 200m of our assets.
6. Page 20 S5.12-‘Activity must not begin before the date given in the permit, unless an early start has been agreed’ – Network Rail would note that permits are submitted for the actual date of works- even when requesting an early start- so this would not apply.
 | NotedNewcastle City Council will only use the national conditions however we have updated the text in this section of the document for clarification.Newcastle City Council may offer a 30% discount for works on traffic sensitive roads outside of traffic sensitive times if it is agreed that is most beneficialAs per guidance from Gerard O’Toole and the HAUC England Permit Forum Newcastle City Council will be charging Network Rail for permitsYes as stated in 16.5 Working near Rail TracksParticular attention must be given to the possible effects of activities taking place at or in the vicinity of therailway. Promoters planning activities in such locations must refer to the advice of the Code of Practice forthe Coordination of Street Works and Works for Road Purposes and Related matters and its successors,which sets out Network Rail’s requirements.Noted – reference to early start has been removed | AmendedAmendedNo changesNo changeNo changeAmended |
|  | NGN | General | General | **Question 1****Do you consider that the permit scheme is suited to the needs of the people, residents and road users of AUTHORITY Council?**Yes | Noted | No changes |
|  | NGN | General | General | **Question 3****Do you think that the permit scheme reflects the requirements of the requirements of the Traffic Management permit Scheme (England) Regulations 2007?**Yes | Noted | No changes |
|  | NGN | General | General | **Question 4****Do you understand the conditions that can be applied in granting a permit?**Yes | Noted | No changes |
|  | NGN | General | General | **Question 5****Do you understand the penalties for not applying for a permit and are they clearly identified in the scheme document?**Yes | Noted | No changes |
|  | NGN | General | General | **Question 6****Do you understand the penalties for not complying with a permit condition and are they clearly identified in the scheme document?**Yes | Noted | No changes |
|  | NGN | General | General | **Question 7****Do you agree with the monitoring proposed and is it adequate?**Yes | Noted | No changes |
|  | NGN | 9.8 | 34 | **Question 8****Are there any other aspects of the scheme for which you require further clarification?**Section 9.8 states the activity promoter will telephone the Permit Authority to apply for a permit variation for the first excavation in each subsequent 50 metre before applying the permit variation. Why do we need to ring first? | To avoid the risk that any variations may be missed during exceptionally busy periods, Newcastle City Council would request that all extensions are discussed via telephone and then confirmed electronically once agreed. The text in the scheme document has been updated to reflect this. | No changes |
|  | NGN | 12.5 | 39 | Section 12.5 states reduction from the PAA fee must indicate they are being submitted together within 3 days … 3 days is a short time period. It also states the reduction of 30% from the permit or PAA fee? | Note 3 days is a short period, however, this allows us to manage workload and demands effectively and efficiently.30% applies to both | No changes |
|  | NGN | General | General | **Question 9****Do you have any suggestions for improving the scheme?**No | Noted | No changes |
|  | NGN | General | General | **Question 10****Do you have any other comments on the permit scheme?**No | Noted | No changes |