

Permit scheme consultation comments with responses.

The table below summarises the responses made as part of the Street works permit scheme consultation. We have been through and assessed those and have summarised our comments to those in the last column. We received a good number of responses that have obviously been carefully considered, and as such we would like to thank all those who took the time to respond.

Where we have agreed and updated the document we have stated as such, where we have considered the change request but not changed the proposal we have tried explain why.

Consultee type	Comment	Oxfordshire County Council response
A councillor (county, district, town, parish)	I think it's vital that Utility company's are interlinked with Oxfordshire County Council highways team to make sure works on roads are completed on time and reinstatement works are on schedule.	Agreed. This is an expected benefit of Permit scheme
A councillor (county, district, town, parish)	Better knowledge and coordination of works, especially by utility companies	Agreed. This is an expected benefit of Permit scheme
Representative of a group of organisation	Reduced journey times resulting in fewer emissions. Less disruption. More trench sharing.	Agreed. This is an expected benefit of Permit scheme
A councillor (county, district, town, parish)	Reduced duration of works, incentives for collaborative working, economic benefits to OCC, businesses and individuals.	Agreed. This is an expected benefit of Permit scheme
Representative of a group of organisation	It will reduce the chance of small but severely disruptive roadworks happening 'ad hoc'.	Agreed. This is an expected benefit of Permit scheme
Representative of a group of organisation	For vulnerable pedestrians, including people with sight loss, the permit scheme will hopefully ensure a more co-ordinated and planned approach to any works carried out that would impact the safe independent mobility of these groups.	Agreed. This is an expected benefit of Permit scheme
Representative of a group of organisation	That only approved works, schemes and contractors will be allowed to carry out works on the Highways	Agreed. This is an expected benefit of Permit scheme
A councillor (county, district, town, parish)	Making permit holders clear about responsibilities and obligations	Agreed. This is an expected benefit of Permit scheme
A neighbouring local authority	The main benefits to be gained from the scheme will be greater control over the management of Roadworks on the Oxfordshire road network. this leads to better planning by all works promoters and therefore the quality of those works improves and the occupation of the network is reduced as a consequence.	Agreed. This is an expected benefit of Permit scheme

Representative of a group of organisation	Overall support for the permit Scheme to reduce modal trips into the city.	Agreed. This is an expected benefit of Permit scheme
A works undertaker/promoter	flexibility on start date for non traffic sensitive 3 & 4 streets.	Start dates must be agreed with Oxfordshire County Council.
A neighbouring local authority	Ensure traffic movements managed as best as possible and cause as least congestion and disruption as possible	Agreed. This is an expected benefit of Permit scheme
Representative of a group of organisation	We could not specifically identify the benefits of the scheme other than monetary in favour of the county council as the document was long and confusingly difficult to read.	Nationally it has been found a scheme will deliver benefits such as reduced duration of works and improved coordination of works.
A works undertaker/promoter	A permit scheme should allow for better liaison between undertaker and highway authority. In paying for a permit the undertaker expects a service to ensure road space is available for planned work and to assist in arranging traffic management and applications for temporary closures and any other requirements. Benefits of the scheme should be: better planning and collaboration with other utilities to reduce congestion , disruption and delays to traffic and pedestrians. The permit scheme should allow for incentives and a better working relationship between promotor and authority. It should also improve parity as the authority should be applying for and processing their own permits. The HA's vision of encouraging innovation through engaged processes to lower future permit fees is welcomed.	Agreed. This is an expected benefit of Permit scheme
A works undertaker/promoter	The scheme is essentially too long. Having over 80 pages it makes it difficult to search through the scheme and there are a number of sections which could be removed and reference made to the National guidance for permit schemes and permit conditions instead. There are too many references to NRSWA which are not required and advise from utilities on the general wording of the scheme appears to have been ignored. There are sections (many are listed in Q 3) which need to be amended as they are legislatively incorrect. We understand the need to charge a permit fee but are disappointed in the scheme charging on all roads especially non TS category 3 & 4. However, we welcome your reduction in fees on non TS 3 & 4 to lower than the maximum allowed.	We tried to make it accessible to both experienced and inexperienced audience. It is in line with other permit scheme documents in terms of length and content.
A works undertaker/promoter	1.5.1 - They only have duration and works type which are aligned. In particular regs 14, 36 and 37 of the 2007 replace parts of NRSWA	No comment
A works undertaker/promoter	1.5.4 - This should relate to the National street gazatteer (NSG) not the SROH.	NSG and SROH are aligned, one is structure and the other the detail. We believe both are useful in this context

A works undertaker/ promoter	2.3 - Remove TMA - objective of the permit scheme should be here "effectively use permits schemes to reduce any adverse effect that highway occupation would have on traffic (including pedestrians) whilst enabling essential maintenance, repair and improvement of the various apparatus within the highway and the highway itself"	As the TMA supports permit schemes we feel this is appropriate.
A works undertaker/ promoter	2.5.1 - include repairs and install new connections.	Agreed, document amended accordingly
A works undertaker/ promoter	3.4 - should be "HAUC (England) Guidance Operation of Permit Schemes (inc. Permit Condition Text) Feb 2017 version 1.0."	Agreed, document amended accordingly
A works undertaker/ promoter	3.7.4 - the use of forward planning notices and not for immediate activities	Agreed, document amended accordingly
A works undertaker/ promoter	4.6 (b) suggest inserting Street Manager and new KPI's	We do not know the full extent of KPIs and so included the term 'current' to allow for changes.
A works undertaker/ promoter	5.1 - suggest removal as irrelevant	We have tried to make it accessible to both experienced and inexperienced audience, and as such feel it is relevant.
A works undertaker/ promoter	5.2 - current system to be superceded by Street Manager expected April 2020	No Comment
A works undertaker/ promoter	6.4 - confusing - suggest rewording the paragraph	Agreed, document amended accordingly
A works undertaker/ promoter	5.7.1 - suggest removal irrelevant	Agreed, document amended accordingly
A works undertaker/ promoter	6.5 - this would not be practical for immediate activities	Agreed, document amended accordingly
A works undertaker/ promoter	6.7 - Only for TS permits. Working days for non TS permits. Unless stated otherwise, reference to "day" means working day, commonly accepted as 08:00 to 16:30 hours. Calculation of dates in relation to notice periods should therefore exclude weekends and public and bank holidays.	Agreed, document amended accordingly
A works undertaker/ promoter	6.8 - A permit can be applied for with the early start date required. No variation is required if start agreed in advance.	Agreed, document amended accordingly
A works undertaker/ promoter	6.9 - excluding immediate works.	Agreed, document amended accordingly
A works undertaker/ promoter	8.5.2 - note to advise this may be removed with street manager	Agreed, document amended accordingly
A works	9.6.2 - fax no longer used and not practical.	Agreed, document amended

undertaker/ promoter		accordingly
A works undertaker/ promoter	10.1(C) - unable to provide more than 1 promotor contact number	Agreed, document amended accordingly
A works undertaker/ promoter	10.1 (E) - working days unless TS permit	Agreed, document amended accordingly
A works undertaker/ promoter	10.1 (F) - illustration not legally required. Permits should not be refused on this basis.	The scheme is looking to promote best practice but agree a permit will not be refused on this basis.
A works undertaker/ promoter	11.8.1 (b) immediate works – urgent	Agreed, document amended accordingly
A works undertaker/ promoter	11.8.2 - Need to rephrase - this is not all instances of immediate activities only where designated on the ASD that the street requires early notification with a valid reason	Agreed, document amended accordingly
A works undertaker/ promoter	11.10.1 - suggest adding 48hrs	Restricted by legislation to use of working days. No change to be made.
A works undertaker/ promoter	11.12 - 11.17.20 - suggest removal as not required. Referred to in 11.12.1 and in table.	We have tried to make it accessible to both experienced and inexperienced audience, and as such feel it is relevant.
A works undertaker/ promoter	13.7.6 _14.3 _16.1.5 _ 18.10.1 No Permits should only be revoked by the permit authority in exceptional or unforeseen circumstances, repeated breach of conditions or safety issues e.g. if there is industrial action, flooding, conflicting significant emergency work (mains burst) or other network failure. In such circumstances, the Authority should inform the works promoter as soon as possible and explain the reason for the revocation.	Agreed, document amended accordingly
A works undertaker/ promoter	16.2.1 (h) - what permit condition covers this requirement?	Agreed, document amended accordingly
A works undertaker/ promoter	16.4.1 - A PMR cannot be used on an immediate permit as it is already in progress. An AIV must be sent but remember works may have already been completed if over a weekend.	Agreed, document amended accordingly
A works undertaker/ promoter	16.4.5 - there are no specific conditions attached to immediate works so how can a list be displayed. They are site specific.	Agreed, document amended accordingly
A works undertaker/ promoter	16.5 - all included in Statutory guidance, this section can be removed as unnecessary.	Agreed, document amended accordingly

A works undertaker/ promoter	16.7.1 - you cannot have more than 1 start and stop on a permit. Once it is in progress it has been started. How the works progress after that should be detailed on the permit.	Agreed, document amended accordingly
A works undertaker/ promoter	18.5.1 - apart from immediate activities where a retrospective permit can be raised. Works may be completed out of hours without having a permit raised until the next working day. This process is therefore not an offence as long as a retrospective permit is raised.	Agreed, document amended accordingly
A works undertaker/ promoter	20.7.2 - notification of the appropriate utility (and allowance for rectification) should take place before charges are levied.	Agreed, document amended accordingly
A works undertaker/ promoter	20.14 - should be inserted Also 10.2 Section 74 – apply to every publicly maintainable highway, except: a footpath or bridleway; a highway with a pedestrian planning order in force; and a highway where vehicular traffic is prohibited – unless that prohibition is restricted to particular times. If the works take longer than both the "Prescribed Period" and the "Reasonable Period", described later in this chapter, they become 'unreasonably prolonged' – and the highway authority may levy a charge for each day, or part of a day, in excess of the longer of the two periods.	Agreed, document amended accordingly
A works undertaker/ promoter	22.9 - not required in scheme and should be removed.	We have tried to make it accessible to both experienced and inexperienced audience, and as such feel it is relevant.
A works undertaker/ promoter	23 - suggest removal and included in separate brief as no relevance to scheme once started and after initiation period.	Agreed, document amended accordingly
A works undertaker/ promoter	24.1 - Not relevant with regard to payment of fees. There is no FPN for not paying your permit fees.	Agreed, document amended accordingly
A works undertaker/ promoter	24.4.2 & 24.4.7 - Confusing please clarify - a draft charge will be sent out listing ALL the permit numbers and costs associated with the permits. Not sure what the account reference number refers to here?	Agreed, document amended accordingly
A works undertaker/ promoter	24.4.5 - suggest via E-mail and sent a month in arrears as standard practice.	Agreed, document amended accordingly
A neighbouring local authority	In response to the consultation on your Permit Scheme, Warwickshire County Council is in full support of your transition from Noticing to Permitting for all works. The move to permits will enable Oxfordshire to have much better control over works that occur on your network and through the use of conditions reduce delay and disruption to vehicles. We have also, as a permitting authority, seen better provision being planned for pedestrians and vulnerable road users at the inception of all schemes. We have seen a year on year continued reduction in occupations of the highway by all works promoters. The move to Permits by Oxfordshire will also assist in cross	Agreed. This is an expected benefit of Permit scheme

	border cooperation, as both Authorities would have a common approach to all works promoters.	
A neighbouring local authority	The benefits included; reduced congestion, a reduction in the duration of works, a reduction in cost pressures, sustainable living promotions and overall better network management and safety.	Agreed. This is an expected benefit of Permit scheme
A works undertaker/promoter	We believe any permit scheme which improves communication, encourages innovation and collaboration and reduced disruption for the public and businesses is a benefit to all. However, this should not be at the detriment to statutory undertakers or customers and the benefits of a scheme can only be realised once the scheme has been in operation for at least a year and the report can show what benefits have been achieved.	Agreed. This is an expected benefit of Permit scheme
A works undertaker/promoter	Thank you for the opportunity to participate in the review of your Permit Scheme. It is however not clear having read through and considered it how many of the aspirations will be delivered and measured. For example how will improvements in Network Management, reduced congestion, improved journey time, reduced carbon emissions, a reduction in works durations etc. be measured? There must be a point at which all of these types of benefits would have been assessed, recorded, and agreed with all practitioners so that if there are indeed any improvements, and if these improvements are singularly attributable to the operation of the scheme, these are clear and visible to all ? Without these starting points and a methodology to record and assess their sole interaction with the Permit Scheme any assigned benefits will be speculative and subject to question and review.	Agreed. This is an expected benefit of Permit scheme
A works undertaker/promoter	<ul style="list-style-type: none"> * We are keen to work with Oxfordshire on the development of an innovation protocol. * Openreach agree that the permit scheme offer better co-ordination for the highway authority. * Appreciate Oxfordshire using Current electronic system as this prevent future alterations. 	No Comment
Oxfordshire resident	To stop the present situation where a road is closed/restricted multiple times over a short period and/or adjacent routes dug up at the same time - sometimes with diversions onto a closed road	Agreed. This is an expected benefit of Permit scheme
Oxfordshire resident	The possibility of reduced inconvenience to road users	Agreed. This is an expected benefit of Permit scheme
A works undertaker/promoter	We believe any permit scheme which improves communication, encourages innovation and collaboration and reduced disruption for the public and businesses is a benefit to all. However, this should not be at the detriment to statutory undertakers or customers and the benefits of a scheme can only be realised once the scheme has been in operation for at least a year and the report can show what benefits have been achieved.	Agreed. This is an expected benefit of Permit scheme

A councillor (county, district, town, parish)	Greater control over planned work implemented by developers	No Comment
A councillor (county, district, town, parish)	It will improve the authority's ability to minimise disruption and inconvenience from street and road works, managing traffic in the most efficient way.	Agreed. This is an expected benefit of Permit scheme
A councillor (county, district, town, parish)	The Town Council support the scheme. It enables planned work to be coordinated with other work and therefore reduces impact on the public.	Agreed. This is an expected benefit of Permit scheme
A councillor (county, district, town, parish)	A more integrated approach especially the coordination of work by different organisations. Should reduce the time taken and stop the delays caused by unattended roadworks	Agreed. This is an expected benefit of Permit scheme
Emergency Services	Nothing further I wish to add at this stage.	No comment
A councillor (county, district, town, parish)	The council will have at their fingertips a more complete picture of the pressure points and inconveniences on the roads in the county. This should hopefully keep bus users, disabled citizens, cyclists, car-owning residents (eg their home parking) and any other groups of local people who are inconvenienced by road works, on the radar as visibly as road traffic.	Agreed. These are expected benefits of Permit scheme
A neighbouring local authority	Better control over when road works are carried out, resulting in less disruption. Also the Council will have better control over who is working on the roads.	Agreed. These are expected benefits of Permit scheme
A neighbouring local authority	The benefits to be derived from the operation of the Permit Scheme are: <ul style="list-style-type: none"> * Improvements to overall network management * Reduced congestion on the road network * Improved journey time reliability, in particular for public transport * A reduction in duration of works * A reduction in cost pressures to businesses caused by delays * Promotion of sustainable communities and businesses * Promotion of a safer environment • Reduced carbon emissions 	Agreed. These are expected benefits of Permit scheme
A councillor (county, district, town, parish)	Easing of traffic flow.	Agreed. This is an expected benefit of Permit schemes
A neighbouring local authority	The benefits would be that the County Council will have more control over coordinating work being carried out on the highways.	Agreed. These are expected benefits of Permit scheme
A works	The scheme applies equally to all works promoters,	Agreed. These are expected

undertaker/ promoter	including Oxfordshire County Council's own works.	benefits of Permit scheme
A councillor (county, district, town, parish	Stopping utility companies from undertaking roadworks without proper notice, co-ordination with other utilites and causing inconvenience to communities. Planning and co-ordination to prevent duplicated roadworks and damage to newly resurfaced roads that could have been avoided.	Agreed. These are expected benefits of Permit scheme
A councillor (county, district, town, parish	No aspects concerne me .	No comment
A councillor (county, district, town, parish	That pavements must be included as well as highways. Does not include failure by the county over highway matters such as rising bollards not working for periods of time.	Agreed. The term Highway include the pavement area
Representative of a group of organisation	Need to ensure sufficient attention is paid to vulnerable road users, pedestrians and cyclists in granting the permit to work. Too often these groups are not catered for through road works	Agreed and the scheme is built on that premise
Representative of a group of organisation	That where possible parish councils or other stakeholders are informed of planned works in their parish/vicinity so that appropriate information can be shared with the community. Consultation ahead of permits being issued would be helpful as there have been several incidents where detours mapped out and circulated were not practical. Once this had been addressed maps and notices had to be redrawn.	With minor and standard works this is impracticable due to lack of time, however with major works it is our desire to involve Parish councils. TTRO processes are managed under a separate process, but noted.
A councillor (county, district, town, parish	This point is a little off the main subject but there are new ways of repairing and finishing roads that are more effective and environmentally advantageous. For example MacRebur (and others?) who use materials derived from non-recyclable waste plastic that was destined for landfill or incineration. See https://www.macrebur.com/ and https://www.bbc.co.uk/news/uk-scotland-south-scotland-47454719 Could the permit approach be used to make environmental issues a key part of the application process? BTW I have no personal beneficial interest in MacRebur!	The scheme can encourage best practice but can not operate outside of current legislation. Oxfordshire are fully committed to support environmentally friendly solutions
Representative of a group of organisation	The assurance that the permits will be issued with care and that they could be revoked if need be.	Yes permits will be issued with care and may be revoked in line with the scheme document.
Representative of a group of organisation	The New Road and Street Works Act (1991) does state "A street authority may attached to a Street Works License such conditions as they see appropriate to minimize the inconvenience to persons using the street (having regard, in particular, to the needs of people with a disability". We hope that these principles will be mirrored within the proposed Permit scheme.	Yes these principles will be mirrored within the scheme.

Representative of a group of organisation	Evaluation of work carried out - recent failings on highways cause disruption or create a poor surface for drivers or pedestrians	The scheme will enable better monitoring of reinstatements.
A councillor (county, district, town, parish	One factor not considered is the poor standard of repair of the road surfaces after contractors have finished their work. Once the integrity of a road or street has been broken there seem to be ongoing costs for the continual repairs to poor quality work and has not been included in the cost benefit analysis. One example (of many) is Honey Lane in Cholsey. The road has been used to lay utilities and is now in a really bad state of repair to the extent that cycling on this road is potentially dangerous due to the surface defects. What provision is there to hold permit holders to account for poor quality work that may take a few years to come to light?	The scheme will enable better monitoring of reinstatements.
A councillor (county, district, town, parish	Neighbourhood forums should have same status as Parish Councils in terms of being informed of forthcoming work under this scheme in the area covered by the NF in Oxford.	No comment
A works undertaker/promoter	22.11.2 b) in addition to our level crossings Network Rail also provides ASD for our rail over road and road over rail bridge structures.	Agreed, document amended accordingly
Representative of a group of organisation	Communication with affect residents is essential. In terms of the pricing structure it is important their views are reflected. There seems a significant difference in price between Road Category 0-2 or Traffic Sensitive Road Category 3-4 and NonTraffic Sensitive. Should they not be closer? Will traffic be encouraged to park on categories 3-4.	This scheme is designed to improve the management of street works. It is not linked to parking.
A works undertaker/promoter	no concerns	No comment
A neighbouring local authority	urgent works such as gas leaks and the H+S takes precedent over congestion and not enough time to rearrange traffic to reduce congestion. using modern communication methods so that road users know of possible delays ie links to in vehicle sat navs or advanced warning signs	No comment
A neighbouring local authority	does the council have the resources to check that the permit is actually being adhered to on the ground?	Yes, permits allow for recruitment of additional officers to support and manage the permit scheme.
Representative of a group of organisation	The parish council would appreciate if it could be consulted on decisions within in its juristiction rather than told once a decision has been made.	With minor and standard works this is impracticable due to lack of time, however with major works it is our desire to involve Parish councils
A works	1.3 - Does not make sense due to duplication. Second	Agreed, document amended

undertaker/ promoter	sentence needs to be removed '	accordingly
A works undertaker/ promoter	9.5 – We don't agree that we should be agreeing standard descriptions and durations locally. As a national company this would be unachievable, we will however ensure that our descriptions are clear. We request that the last sentence is removed	We are trying to promote best practice but appreciate this may not be achievable for some companies. This is an encouragement to try if possible.
A works undertaker/ promoter	12.3.3 – Remove comma between response and times.	Agreed, document amended accordingly
A works undertaker/ promoter	16.4.5 – Please review this paragraph, it gives the impression that Oxfordshire will make a decision on whether they wish to incorporate any changes, we'd expect that any changes to legislation would be incorporated in the first instance.	Agreed, document amended to clarify.
A works undertaker/ promoter	16.8.1 - This paragraph is unclear, is it referring to s74 charges still applying despite a variation being granted? Formatting issue also.	S74 over runs apply on all occasions where work continues after the agreed works end date even if the end date has been agreed by variation. The new varied end date becomes the end date for the works after which point penalties apply.
A works undertaker/ promoter	16.9.4 – This paragraph is unclear, it should state that all signs should be removed when no longer required	We disagree and feel the paragraph is clear. No change to be made.
A works undertaker/ promoter	16.12.2 - Please use bold font	Agreed, document amended to clarify.
A works undertaker/ promoter	16.18.1 - Does not make sense please clarify what is meant.	We disagree and feel the sentence is clear. No change to be made.
A works undertaker/ promoter	20.13.1 – Remove paragraph, it does not add value to the permit scheme documents	Agreed, document amended to clarify.
A works undertaker/ promoter	We would welcome our members comments and previous feedback to be addressed and the permit scheme amended to show correct legislation, remove any out dated or incorrect references and ensure street manager is referenced in all areas of the permit scheme which will not be valid after implementation in April 2020. These include the chapters on Eton, NRSWA, permit regulations, validity periods, PMR's and glossary terms not in the scheme. There are several sections which should be removed specifically relating to Eton and permit conditions and the national street gazateer which we believe are not required and should not be specifically part of this permit scheme.	These issues are discussed as part of members individual comments.
A works undertaker/	We believe the scheme is too long and there are several sections which could be removed as they are not relevant	We tried to make it accessible to both experienced and

promoter	to the scheme or are covered in current statutory guidance.	inexperienced audience. It is in line with other permit scheme documents in terms of length and content.
A works undertaker/ promoter	There does not appear to be a cost benefit analysis and the impact assessment does not follow the usual guidelines and required analysis when setting up a permit scheme.	The DfT cost benefit analysis tool was used and a summary of which was provided as part of the consultation document,.
A works undertaker/ promoter	We are disappointed that the scheme shows charging on all streets (albeit not all at the maximum rate) but feel non traffic sensitive category 3 and 4 streets should be nil charge. Then scheme has too many references to Eton and only one note regarding the introduction of street manager. All the existing terminology will need to be changed once street manager is implemented , having a scheme which is generic and does not require these multiple changes we believe would be beneficial to all. There are several entries in the glossary which do not appear to be in the scheme eg FTP - File transfer protocol and works clear and closed.	The decision was made to charge on all roads to create a balanced scheme to be inclusive for all the citizens for Oxfordshire. No change to be made.
A works undertaker/ promoter	<p>-There are currently only 2 discounts included in the scheme. I would like to suggest the inclusion of the following discounts.</p> <ul style="list-style-type: none"> * Activities on different streets are part of the same project, submitted at same time and identified as same project on Permit Application * Activity that provides economic benefit or meets customer demand. E.g. fibre * Asset replacement undertaken before resurfacing * Completely New connections * Works completed to rectify defective apparatus (S81) within the respective response time of that specific Section 81 defect * Works completed to rectify defective apparatus (S81) within 21 days * Promoter undertakes a reinstatement to the requirements of the permit authority on a street with a live Section 58 restriction 	Oxfordshire are committed to discounts as the scheme evolves and needs changes. No changes to be made.
A works undertaker/ promoter	-Also according to 'Para 3.3 of the DfT Advice Note for local highway authorities developing new or varying existing permit schemes states "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." So I'd like to ask	We note the advice note but the decision was made to charge on all roads to create a balanced scheme to be inclusive for all the citizens for Oxfordshire

	why permit fees are included on category 3&4 roads?	
Oxfordshire resident	How will you check that roadworks will not immediately follow road improvements and destroy the new surface	These scheme allow the authority to put in place a structure to monitor this
Oxfordshire resident	The description is over long and suggests an over bureaucratic approach	We tried to make it accessible to both experienced and inexperienced audience. It is in line with other permit scheme documents in terms of length and content.
A works undertaker/ promoter	We believe the scheme is too long and there are several sections which could be removed as they are not relevant to the scheme or are covered in current statutory guidance. There does not appear to be a cost benefit analysis and the impact assessment does not follow the usual guidelines and required analysis when setting up a permit scheme. We are disappointed that the scheme shows charging on all streets (albeit not all at the maximum rate) but feel non-traffic sensitive 3 and 4 streets should be nil charge. Then scheme has too many references to Eton and only one note regarding the introduction of street manager. All the existing terminology will need to be changed once street manager is implemented, having a scheme which is generic and does not require these multiple changes Virgin Media believes would be benefit. There are several entries in the glossary which do not appear to be in the scheme eg FTP - File transfer protocol and works clear and closed.	The document has been updated where applicable relating to individual members comments
A councillor (county, district, town, parish	The application system should be simple enough for those requests made by event organisers.	Events are managed under separate legislation and not via a street works permit scheme. No change to be made.
A works undertaker/ promoter	We would welcome comments and previous feedback to be addressed and the permit scheme amended to show correct legislation, remove any out dated or incorrect references and ensure street manager is referenced in all areas of the permit scheme which will not be valid after implementation in April 2020. These include the chapters on Eton, NRSWA, permit regulations, validity periods, PMR's and glossary terms not in the scheme. There are several sections which should be removed specifically relating to Eton and permit conditions and the national street gazetteer which believes are not required and should not be specifically part of this permit scheme.	The document has been updated where applicable relating to members comments
Representative of a group of organisation	There is a need to exercise more control over works undertaken by utility companies on the highways. Around Wantage area there have recently been occasions where	Agreed, an expected benefit of the scheme is improved network coordination.

	two or more major trunk routes have been closed or obstructed by roadworks at the same time.	
A councillor (county, district, town, parish	I completely approve of the stated objectives that the new system will provide more accurate information about journey times and more reliable journey times.	No comment
Emergency Services	None at this stage . I understand this is a legal obligation being imposed on every Highway Authority in order to achieve consistent working practice .	No comment
A councillor (county, district, town, parish	<p>I don't see much about enforcement in the proposal. There's a paragraph on it being a criminal offence to breach conditions and the possibly revocation of the permit. But please pre-think how to get contractors and developers to stick to deadlines, for the sake of residents who are being put-out.</p> <p>I'll give an example - I say this in the context of being chair of the Planning Committee on Witney Town Council since May 2019 - a developer on Corn Street in Witney put up several terraced houses on the street front and several more behind a coaching gateway. Cones have been demarcating no parking on both sides of the road since before May. This affects residents on both sides of the road. The bus stop has been temporarily relocated all that time, meaning bus users lost their seat, shelter, real-time info screen and were subjected to a more dangerous road crossing. Residents of an adjacent side street have written to me to say they are petrified of turning out of the side street when a bus is at the temporary stop because there is no visibility. That's three sets of local people who have been put out for well over 4 months so that.. one developer can make a profit. I think there needs to be more give and take than that: tight deadlines for stages of the process, enforcement of the deadlines, an expectation in favour of the public so that inconvenience to them is minimised.</p> <p>There is scope for even better joined-up thinking - require applicants to outline alternatives to the disruption they will cause. Alternative parking spaces, alternative road routes (granted, diversions are quite well established). And please include carpark works and other infrastructure (trains; water works that incur flooding etc) in your permits. Here's an example from today: Botley Road is at a standstill due to the works at Osney Mead. Yet a sizeable portion of Seacourt Park and Ride carpark is shut. A resident reported on Twitter that there were plenty of spaces at Botley shops (I was not clear if that was the 'Decathlon' carpark or the precinct, but I inferred the latter, because the precinct is a</p>	The fundamental principle of any permit scheme is that the scheme should be undertaken to the benefit of the road user rather than the works promoter. This scheme will hopefully help with some of your observations

	<p>massive building site). She suggested that the Park and Ride managers should have worked with the Botley carpark to find a solution for drivers. I picture buses running from there once Seacort P&R is full, with commensurate signage. Alternatives should be sought - even if it's a field in Farmoor or Cumnor with buses running from there!</p> <p>I have heard via Oxford Livable Streets about 'modal filters'. I assume that is traffic lights that a weighted towards the most vulnerable and then the greenest road users - pedestrians, cyclists, buses and then motorists. Your scheme should exploit this as part of temporary measures too.</p> <p>I would like to see reference to the needs of bus users, as well as to bus companies. Your document talks about the companies and routes but this can be interpreted as a financial consideration, whereas we need to be talking about residents getting from a to b quickly, safely, without losing their bus stops. I watched a bus refuse to stop on Botley Road at an out-of-service stop today, and a lady was visibly agitated at the stop, because it was hard for her to get to another stop. Another bus then stopped for an elderly man at that stop - at the discretion or oversight of the driver, I suppose. When we are all in gridlock anyway, why can't the bus stop as usual?</p> <p>I tackled the document via finding keywords: time, peak sensitive, parking, alternative, penalty, enforcement, cyclist, bus... and for the most part, I found good sense and comprehensive coverage. My final sphere of knowledge comes from commuting on the A4095 from Witney to Woodstock for 12 years. It's a highly sensitive route. I recall flooding in Bladon (apart from 2007), which made it impassable, but local radio was very useful. I recall calling OCC a couple of times about temporary traffic lights in Long Hanborough and further towards Bladon that were on before 8 am, with no sign of workers. I haven't worked there for 3 years and recently I tried to get to Hanborough Station for 7:30 am and temporary traffic lights outside the development nearest to Witney were on, with absolutely no workers on site. The council were helpful back in the days when I called them about smallscale traffic lights. I wonder if the sheer scale of development in places like Hanborough has worn expectations down and allowed an increase in inconvenience to the public. We missed the train, by the way.</p>	
A neighbouring local authority	The criteria for obtaining a scheme needs to be robust.	No comment.

A neighbouring local authority	It would be useful to organise coordination between different agencies which are planning work on the highways to ensure that works take place at the same time and therefore reduce disruption by closing roads or erecting traffic lights several times over a year. It would also prevent roads from being dug up so many times and therefore protect the integrity of the road surfaces for longer.	Agreed. These are expected benefits of Permit scheme
A councillor (county, district, town, parish)	The Planning Committee of The Parish Council reviewed the documents and fully support this consultation in that it would be good to have the County Council coordinating the work done on highways.	No comment.
A works undertaker/promoter	The scheme document is too long at 84 pages, with unnecessary sections duplicated within the document or from the (statutory) Code of Practice for Co-ordination, or DfT Statutory Guidance. This additional text makes the scheme document unwieldy. There are also sections that appear to be attempting	We tried to make it accessible to both experienced and inexperienced audience. It is in line with other permit scheme documents in terms of length and content.
A works undertaker/promoter	There is no scheme start date (as required by Regulation 4(g))	The start date of the scheme will be confirmed in the final document.
A works undertaker/promoter	The early start process in 6.8 does not appear to be in line with HAUC (England) Guidance	Agreed, document amended to clarify.
A works undertaker/promoter	7.1(a) works can start later than the proposed start date.	Agreed.
A works undertaker/promoter	8.5.1 - a permit is not for 'booking road space' but to have a permit to carry out specified works (as per 9.1)	Agreed, document amended to clarify.
A works undertaker/promoter	9.5 - standard descriptions cannot be enforced or used as a reason to reject a permit.	Agreed - referred to as 'should' DfT and Oxfordshire believe it is best practice and encourage it where available
A works undertaker/promoter	10.1 - in general please explain how all of this information is to be provided as it is not currently fully supported in EToN and some of this information will not be supported in Street Manager?	Agreed - referred to as 'should' DfT and Oxfordshire believe it is best practice and encourage it where available
A works undertaker/promoter	10.1 (f) - please provide what is meant by "For certain activities and/or locations, the Permit Authority may request additional information in relation to contingency plans for expedient removal of site occupation, as part of the application" and which permit condition this relates to?	This is meant to allow for gathering of further information as required
A works undertaker/promoter	10.1(h)(ii) - please explain what is meant by "Applications to use portable traffic signals on "immediate" activities should also be supported by the Promoter"?	If you are undertaking immediate works you are encouraged to use portable signals

A works undertaker/ promoter	10.1(l) - regardless of the system, the permit regulations provide for the Permit Authority to attach conditions to a permit (as part of the work needed for the permit fee).	No comment
A works undertaker/ promoter	10.2.5 - we would expect the Permit Authority to manage their own audit trail for imposed variations.	No comment
A works undertaker/ promoter	12.5.2 - please provide examples of "other grounds for refusal"?	We do not feel it is appropriate to define lists of 'other ground at this time. No change to be made.
A works undertaker/ promoter	16.6.1 - please note this is not an enforceable requirement.	Referred to as 'may' in document to encouraged best practice. No change to be made.
A works undertaker/ promoter	16.10.5.1 - please note this is not an enforceable requirement where the traffic management is less severe.	This clause is intended to encourage communication at the earliest possible time. No change to be made.
A works undertaker/ promoter	20.5 - 20.7.8 - please explain why Section 81 (NRSWA) process has been included in this permit scheme document. This is not a permit scheme process.	We tried to make it accessible to both experienced and inexperienced audience. It is in line with other permit scheme documents in terms of length and content.
A works undertaker/ promoter	22 - why is it necessary to include this in the permit scheme document?	We tried to make it accessible to both experienced and inexperienced audience. It is in line with other permit scheme documents in terms of length and content.
A works undertaker/ promoter	Appendix A	No comment
A works undertaker/ promoter	Appendix E - please explain the purpose of including this within the permit scheme document?	With the intent to reduce disruption, This Appendix outlines monitoring measures that we would like the scheme to promote.
A works undertaker/ promoter	Appendix F - for completeness, please include the proposed variation fees and the discount for working wholly outside traffic sensitive times.	Agreed. Document amended accordingly

<p>A councillor (county, district, town, parish</p>	<p>There needs to be strict control over the quality of restoration. Often contractors' repairs are of poor quality leading to future pot holes. The restoration should be of the same quality as the original road surface or better. Signalling needs to be guaranteed to be effective. There needs to be better enforcement of parking restrictions on urban roadworks where removal of vehicles is necessary. There is an assumption that vehicles parked on a road belong to the householders; this is not the case leading to vehicles that cannot be removed and delays to roadworks. Roadworks should start and finish on the times indicated on signage; often roadworks do not start on time causing problems for residents and bus users where bus routes have to be diverted.</p>	<p>Agreed. This is an expected benefit of Permit scheme</p>
<p>A councillor (county, district, town, parish</p>	<p>Members of The Town Council's Planning Committee discussed this consultation on the 5th August 2019.</p> <p>Minute number 168 refers (extract below)</p> <p>Members discussed, noting the County Council are trying to cover the costs of the utilities road closures but they were concerned that these permit charges could be passed on to organisers of local community events, such as carnivals as well.</p> <p>It was Proposed by Councillor Upcraft, Seconded by Councillor Kidley and</p> <p>RESOLVED: THAT the Town Council's response would be that there is no objection to the permit charges providing these do not extend to community road closures such as carnivals, Christmas Fairs and Remembrance Sunday. Individual Councillors may respond to this effect as well.</p>	<p>Events are managed through a different process to the scheme works</p>
<p>A councillor (county, district, town, parish</p>	<p>This is necessary to stop utilities acting without control or notification.</p>	<p>No comment</p>
<p>A works undertaker/ promoter</p>	<p>Thank you for the opportunity to participate in the review of your Permit Scheme. It is however not clear having read through and considered it how many of the aspirations will be delivered and measured. For example how will improvements in Network Management, reduced congestion, improved journey time, reduced carbon emissions, a reduction in works durations etc. be measured? There must be a point at which all of these types of benefits would have been assessed, recorded, and agreed with all practitioners so that if there are indeed any improvements, and if these improvements are singularly attributable to the operation of the scheme, these are clear and visible to all ? Without these starting points and a</p>	<p>The measures outlined will be reviewed as part of the evaluation at the end of year one.</p>

	methodology to record and assess their sole interaction with the Permit Scheme any assigned benefits will be speculative and subject to question and review.	
A works undertaker/promoter	There is not a full Cost/Benefits analysis (CBA) as part of this consultation. How can 4.5 (ii) be evaluated without a starting point? The impact analysis document you have provided does not provide the necessary analysis on the cost model you have chosen to follow.	The DfT cost benefit analysis tool was used and a summary of which was provided as part of the consultation document,.
A works undertaker/promoter	The permit scheme document is excessively long and includes sections which could be removed. Extremely cumbersome to read and difficult to find the basic operational elements of the scheme.	We tried to make it accessible to both experienced and inexperienced audience. It is in line with other permit scheme documents in terms of length and content.
A works undertaker/promoter	We understand the need to charge a permit fee but are disappointed that the scheme charges on all roads, especially on those non traffic-sensitive category 3 & 4 streets.	The decision was made to charge on all roads to create a balanced scheme to be inclusive for all the citizens for Oxfordshire
A works undertaker/promoter	The scheme includes processes already covered by legislation which is not changed under a permitting regime. For example, S74 NRSWA charging scheme, the S81 NRSWA duty to maintain apparatus, reinstatement defect process etc. Inclusion of these sections may cause conflict with existing primary legislation which will take precedence over what is included in a permit scheme. These sections should be removed to prevent any conflict.	We tried to make it accessible to both experienced and inexperienced audience. It is in line with other permit scheme documents in terms of length and content.
A works undertaker/promoter	Section 22 has little or no relevance to a permit scheme, the onus on Oxfordshire County Council to maintain a register and a gazetteer is covered under other regulation and is not necessary to be included in a permit scheme as there is no change to the obligation.	We tried to make it accessible to both experienced and inexperienced audience. It is in line with other permit scheme documents in terms of length and content.
A works undertaker/promoter	The 2017 HAUC (England) guidance for the operation of permit schemes was developed by those authorities and promoters with many years of experience with permits, and as such we are surprised that Oxfordshire County Council has not utilised this guidance when designing the scheme.	The documents were taken into consideration when designing the scheme and the processes were woven into the scheme
A works undertaker/promoter	There are still too many EtoN based references; as EtoN is to be replaced by another electronic system any such references need to be more generic as they will not be in the replacement system (particular functions may still exist but the terminology will not be the same) . For example, permit modification request, modified application, works closed, works clear, collaboration type etc. Also, a local	We disagree. We have followed DfT guidance to make sure all system references refer to 'electronic means'. No change to be made.

	register is going to be replaced by a centralised register with the advent of Street Manager.	
A works undertaker/promoter	Section 10 includes details which are present in EtoN but not in regulation, as such may not be included in any replacement electronic system. This means that this document will need to be amended and go through another consultation. The document should be written in such a way that this amendment is not necessary when Street Manager is introduced. I would suggest something akin to the final comment on 10.1 (l).	We will ensure the scheme meet with the most current regulations. No change to be made.
A works undertaker/promoter	There are entries in the glossary that do not appear anywhere in the document, these need to be removed as they create more questions rather than offer clarity. For example, FTP – File transfer protocol, XML – extensible mark-up language, above ground, Distribution Network Operator (DNO), e-government, Local planning authority, National land and property gazetteer, etc.	Agreed, document amended to clarify.
A works undertaker/promoter	1.3 duplicated statements, very wordy, extremely difficult to read, suggest shortening to ensure clarity.	This is a legal statement
A works undertaker/promoter	1.5.4 would suggest removal of the edition of the SroH to futureproof the document when the next edition is released..	No comment.
A works undertaker/promoter	2.7 Please confirm that Oxfordshire will demonstrate the current values of these expected benefits before the scheme starts.	We can confirm this
A works undertaker/promoter	3.8.4 We welcome the waiving of permit fees in the event of collaboration. However, the wording needs to be amended – there may not be a ‘collaboration type’ in the next electronic system – suggest the wording is changed to ‘accurate collaboration details’	Agreed, document amended to clarify.
A works undertaker/promoter	5.5.2 & 3 these paragraphs are unnecessary and unrelated to a permit scheme.	We tried to make it accessible to both experienced and inexperienced audience. It is in line with other permit scheme documents in terms of length and content.
A works undertaker/promoter	6.2 Please clarify which regulations the list of specified works are listed as they do not seem to appear in either the 2007 or the 2015 permit regulations.	This list is set out in the NRSWA code of practice.
A works undertaker/promoter	6.7 Validity Periods are available for planned activities taking place in category 3 and 4 streets that are not traffic sensitive. This is detailed in Section 7.2b. These sentences need to be removed as validity periods are explained in 7.1. No need to duplicate.	Agreed, document amended to clarify.

A works undertaker/ promoter	7.2.3. A PAA has a validity period also, this should be included. Any minor changes to the PAA can be recorded on the PA, only major changes to the plan should be discussed with the HA. The HAUC guidance for the operation of permit schemes explains this with more clarity and examples. Amendments to the PAA can be accommodated with discussion on the permit application however significant changes will require a replacement of the PAA. (for example, significant shift in time or change of impact i.e. some incursion changes to full closure or controlled crossing point now affected).	No comment
A works undertaker/ promoter	7.2.4. This sentence does not make sense. The 'final detailed information supporting the permit application ' there is no mention that a follow up permit application is to made after a PAA. The sentence above should be amended to reflect the requirement for a permit application.	Agreed, document amended to clarify.
A works undertaker/ promoter	8.5.2 The DfT are consulting about changing the definition of major works – would suggest that this document refers to where the categorisation is held in the regulations to prevent having to change this scheme.	Agreed, document amended to clarify.
A works undertaker/ promoter	10.1 (f) Not all works promoters are able to utilise the attachment functionality in EtoN. It is not a mandatory field within EtoN or regulation so it is not a valid basis for a refusal.	Document states as 'should' DfT and Oxfordshire believe it is best practice and encourage it where available. No change to be made.
A works undertaker/ promoter	10.1 (l) Refers to EtoN notification types/terminology which needs to be futureproofed.	We disagree. All efforts have been made to remove reference to EToN. No change to be made.
A works undertaker/ promoter	10.1 (all) this list includes requests for information for which there is no field within the current electronic system. Please confirm where this information is to be recorded considering there is a character limit on all notifications.	Referred to as 'should' DfT and Oxfordshire County Council believe it is best practice and encourage it where available. No change to be made.
A works undertaker/ promoter	10.2.2 Please confirm how you are going issue a permit once you have granted a permit.	Agreed, document amended to clarify.
A works undertaker/ promoter	11.8.1 unnecessary duplication	We disagree. We feel the text is appropriate for the section of the document.
A works undertaker/ promoter	11.10.1 duplication of 13.4	Agreed, document amended to clarify.
A works undertaker/ promoter	12.5 This does not meet the requirements of Regulation 9 in the permit regulations as amended in 2015.	Agreed, document amended to clarify.
A works undertaker/ promoter	14.5 Is there no option for reasonable discussions between parties before dispute resolution?	This allows for worst case circumstances. Informal discussion are expected to minimise the need for this

		scenario
A works undertaker/promoter	15 c) does not appear in regulation or primary legislation and therefore must be removed.	This is included Oct 15 Statutory Guidance for HA Permit Schemes
A works undertaker/promoter	16.4.1 immediate activities by their nature are works which have already started, by issuing a permit modification request this is effectively forcing all promoters to be working illegally in all cases. In the case of immediate works the response should be a grant followed by authority imposed variation. The HAUC (England) guidance for the operation of permit schemes was developed to prevent such scenarios as above. Also, permit modification requests are EtoN terminology which will/may not appear in the new electronic system and as above comments, should be removed.	Agreed, document amended to clarify.
A works undertaker/promoter	16.4.4. this requirement does not belong in a permit scheme as it is covered by other separate legislation.	We tried to make it accessible to both experienced and inexperienced audience. It is in line with other permit scheme documents in terms of length and content.
A works undertaker/promoter	16.6.1 There are no standard conditions as described. The only conditions allowed are held within the statutory document.	Agreed, document amended to clarify.
A works undertaker/promoter	16.7 to 16.14. This whole section is irrelevant as the permit scheme must follow the statutory document.	We tried to make it accessible to both experienced and inexperienced audience. It is in line with other permit scheme documents in terms of length and content.
A works undertaker/promoter	17.1 The current code of practice for inspections does not include the inspection types in this section. They are a concept introduced within EtoN 6 only – which will be replaced by another electronic system.	No comment
A works undertaker/promoter	18.10 duplication with sections 14 and 16.	We disagree. We feel both sections are relevant to the document. No change to be made.
A works undertaker/promoter	20.2 to 20.16 All this information has no bearing on the permit scheme as it is covered by other separate unrelated legislation and should be removed.	We tried to make it accessible to both experienced and inexperienced audience. It is in line with other permit scheme documents in terms of length and content.
A works undertaker/promoter	22 The only parts in this section which are pertinent to the permit scheme are 22.1 to 22.5.2, 22.6, 22.9.1, 2 & 3. The rest of the information exists in other regulation/legislation and should be removed.	We tried to make it accessible to both experienced and inexperienced audience. It is in line with other permit scheme documents in terms of length and content.

A works undertaker/ promoter	In the glossary there is mention of a works clear notice and a works closed notice. These notices have not existed since 2008. Page 89 of EtoN 6 tech spec states	Agreed, appendix amended to reflect this.
A councillor (county, district, town, parish	<ul style="list-style-type: none"> • Objection to the proposed level of suggested fees as they seem too low. Higher fees would encourage faster closure of projects. 	The scheme must be cost neutral as the fees have been constructed to deliver a balanced approach. It is not possible to charge whatever we want. No change to be made.
A councillor (county, district, town, parish	<ul style="list-style-type: none"> • The length of time it takes for projects to be finished should be shortened and encouraged through higher fee structures. 	The scheme must be cost neutral as the fees have been constructed to deliver a balanced approach. It is not possible to charge whatever we want. No change to be made.
A councillor (county, district, town, parish	<ul style="list-style-type: none"> • A deposit scheme should be instigated and utilised for fines should delays occur or works inadequately made good, again encouraging timelines being met and projects delivered swiftly. 	This is covered under Section 74 or NRSWA
A councillor (county, district, town, parish	<ul style="list-style-type: none"> • Signage should be put up further in advance to inform people sooner of potential works. The current notice periods do not seem long enough. 	No comment
A councillor (county, district, town, parish	<ul style="list-style-type: none"> • Phone numbers of utility companies need to be visible and accessible during works ensuring contact with appropriate personnel should a problem occur. The Council should be notified of works and provided with contact details. 	Agree, information boards are standard on all sites
Representative of a group of organisation	Resolved: The Committee note the proposals for the Oxfordshire Permit Scheme. The Committee asked that the County Council should ensure that following any works the highways is properly re-instated contractor and that a follow up inspection takes place six months after the work has been completed so that the County Council are satisfied that the re-instatement is to the requisite quality and that there are no safety issues resulting from the works.	Inspection processes are in place but are expected to improve further under a permit scheme.
Public transport provider	How will we be notified of future works and emergency works? The scheme document appears to suggest that the current approach, where a scheme Promoter sends an email will likely continue.	This is correct.
Public transport provider	Will sufficient resources be provided to manage the scheme in practice? Currently, HAUC meetings do not seem to be happening, apparently due to a lack of resources – will they be reinstated following (or, in fact, before) the introduction of the Permit Scheme?	Yes, permits allow for recruitment of additional officers to support and manage the permit scheme.
Public transport provider	Will the rules be enforced? Paragraph 18.5.1. states “It is a criminal offence for a Statutory Undertaker or someone acting on its behalf to undertake works without a permit.”	Yes, permits allow for recruitment of additional officers to support and manage the permit scheme.

Public transport provider	Paragraph 18.2 gives the Permit Authority the power to discuss with the Promotor before instigating criminal proceedings, and 18.6 describes the powers that the Permit Authority has to issue Fixed Penalty Notices. The scheme will not be pointful without the Permit Authority exercising these powers when the terms of the scheme are breached.	No comment
Public transport provider	What will the process be if a utility tends to have many "emergency" works needing immediate action?	Emergency works allow the works promoter to begin works immediately and apply for a permit within 2 hours of the works commencing.
Public transport provider	Paragraph 1.5.9 states that permits are required for Highway Works, but that there will be no charge for these, even where the work is being carried out by a developer under Section 278 of the Highways Act 1980. With the very large amount of development planned, how will the Permit Scheme be resourced to handle the very many permits required which don't involve payment to the County Council?	The Council will retain a number of staff funded by the authority to handle non statutory undertaker works.
Public transport provider	Will the rules be enforced internally? I understand from paragraph 1.5.6 that "shadow fees" will be charged and collated. Historically, the County Council and City Council do not seem to have been entirely exemplary in coordinating works. The recent closures of Cowley Road and Oxford Road, for carriageway repairs, followed almost immediately by longer closures for major works to the carriageway, is a classic example where there appeared to be a lack of communication or joined up thinking. It may be that there was some logic to the sequencing of work there, and it would have been better if it was explained.	Yes. Shadow fees are recorded for all of the Councils internal works to ensure parity of treatment between works promoter and this will be covered in the schemes annual report.
Representative of a group of organisation	would the County Council consider the University to be a Statutory Undertaker and have to apply for a street permit	Those who carry out work on behalf of the University would be considered statutory undertakers.
Representative of a group of organisation	would the County Council apply for the Street Permit on our behalf with the fees met by the University	Statutory undertakers would be required to apply for a permit.
Representative of a group of organisation	would our works continue to be licenced under section 50 of the New Roads and Street Works Act 1991 as stated in paragraph 1.58?	Yes
Representative of a group of organisation	Paragraph 1.5.9 states that "All Highway Works (including Developer activities under Section 278 of the Highways Act 1980) will require a permit however permit fees will not be applied." As the University undertakes Developer activities using Section 278 agreements, we request clarification on how this will work in practice. Specifically, in the context of the University constructing a new highways access to its development(s), we would presumably not be a Statutory Undertaker, so would the County apply on our behalf for a street permit to enable us to undertake the Section 278	All S50 applicants will be required to provide details of their works. A permit would be acquired by OCC on their behalf and any fee for that would be included in S.50 charges.

	works? We suggest this is clarified in the permit scheme.	
Representative of a group of organisation	The Permit scheme is fairly complex, lengthy and technical document. It would be useful to have a condensed, more simple version of the guidance aimed at the public and for organisations that may need to commission works in the highways but are not a Statutory Undertaker.	No comment