

# Norfolk Permit Scheme

Annual Report 2014/15

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## 1.0 Background

- 1.1 Permit Schemes provide a way to manage activities on the public highway and were introduced by Part 3 of the Traffic Management Act 2004 (TMA) to improve authorities' ability to minimise disruption from street and road works.
- 1.2 The Norfolk Permit Scheme went live on 6 May 2014 following approval by the Secretary of State. It is a requirement that an annual report be produced for each of the first three years that the scheme is in operation and then each third year. This report relates to the first year of operation, 6 May 2014 to 5 May 2015.
- 1.3 Prior to 6 May 2014 all works promoters were required to give notice of their intended works to the Highway Authority. This notification effectively booked the required road space. Under a permit scheme, all works promoters are required to obtain permission from the Highway Authority in order to proceed with their plans. This permission, or permit, allows the Highway Authority an opportunity to require conditions to apply to how the works will be delivered in order to mitigate the impact the works could have on the road network.
- 1.4 The Norfolk Permit Scheme applies to the whole of Norfolk's 9,800km road network but excludes the trunk roads (A47, A11 and A12). A permit fee applies to all permits, however a two tier fee structure allows a lesser fee to be applied to less busy streets to reflect the amount of effort it takes Norfolk to assess the permit application. In addition, concessions are provided to encourage best practices, works that have a smaller environmental impact and for collaborative working.
- 1.5 All permit schemes must be able to demonstrate parity for all works promoters and mandatory Key Performance Indicators are required to measure this. Norfolk has also adopted some additional Key Performance Indicators to further demonstrate this requirement and to measure good behaviour. Some Key Performance Indicators trigger some concessions associated with the Norfolk permit Scheme.
- 1.6 It is a requirement that permit schemes operate on a 'cost neutral' basis. The overall income from the permit fees may not exceed the prescribed costs of operating the permit scheme as defined in Regulation 29. A sustained surplus would indicate that the income regularly exceeds the prescribed costs and the permit fees adjusted in line with S86 of the 2004 Statutory Guidance for Permits. At the commencement of a permit scheme the set up costs will require repaying and the concessions intended for return will need establishing. At the end of the first year of operating the Norfolk Permit Scheme a sustained surplus had not been experienced. It is also noted that a new concession, not previously catered for, will apply from 1 Oct 2015 where a lower fee will apply to those works in a traffic sensitive street which take place wholly outside the traffic sensitive times. A more detailed fee review would be appropriate at the end of the second year.

- 1.7 At the time the Norfolk Permit Scheme was approved there were no known major projects such as Cross Rail, Olympics, TIF projects, Thames Gateway projects etc affecting Norfolk and this remains the case. However, the Norfolk Permit Scheme has been designed to give flexibility in the delivery of such major projects, should they affect the county.

## 2.0 Mandatory Performance Measures

- 2.1 Key Performance Indicators 1 to 5 represent the mandatory measures which apply to the Norfolk Permit Scheme. These results are set out below together with an indication of what we feel they show.
- 2.2 These measures were first produced in September 2014 and have been shared with all promoters each month since October 2014.
- 2.3 Unfortunately there is no national specification on how the indicators are to be compiled. The Technical Specification for the electronic transfer of notices, the Code of Practice for Permits and national Permit Guidance do not always align with each other. There also appears to be inconsistencies between the software systems used to maintain the permit register and that used by works promoters to manage their permits. Norfolk has used the following principles in producing the monthly data:-
- The application date of the works determines which period the work falls in.
  - There is a complex relationship between phases, works and cancellations which results in these reports not being able to consider cancellations.
  - Permits applied for in one month may have been cancelled, refused or amended the following month and counted accordingly. This can unbalance the result for smaller promoters.
- 2.4 KPI 1 – the number of permit & permit variation applications received, the number granted & number refused

	Highway Authority		Utilities	
	Number	Percentage of Total	Number	Percentage of Total
Permit / variations granted	11397	91.1%	24797	83.9%
Permit / variations refused	976	7.8%	4508	15.3%
Deemed	142	1.1%	255	0.9%
<b>Total</b>	<b>12515</b>		<b>29560</b>	

Table 2.1

- 2.4.1 The above table indicates that permit applications were received by both external and internal works promoters. Applications were assessed resulting in some applications requiring amendment before they were granted. Some amendments were requested using the Permit Modification Request. These

are considered a 'polite refusal' and are counted as a refusal. Most Permit Modification Requests are responded to by the promoter with a modification that leads to the permit being granted.

2.4.2 Some permit applications do not receive a reply from the permit authority within the response period. The street works register treats these as 'deemed approved' once the response period has expired. The above table also shows a small amount of applications from both external and internal promoters had deemed.

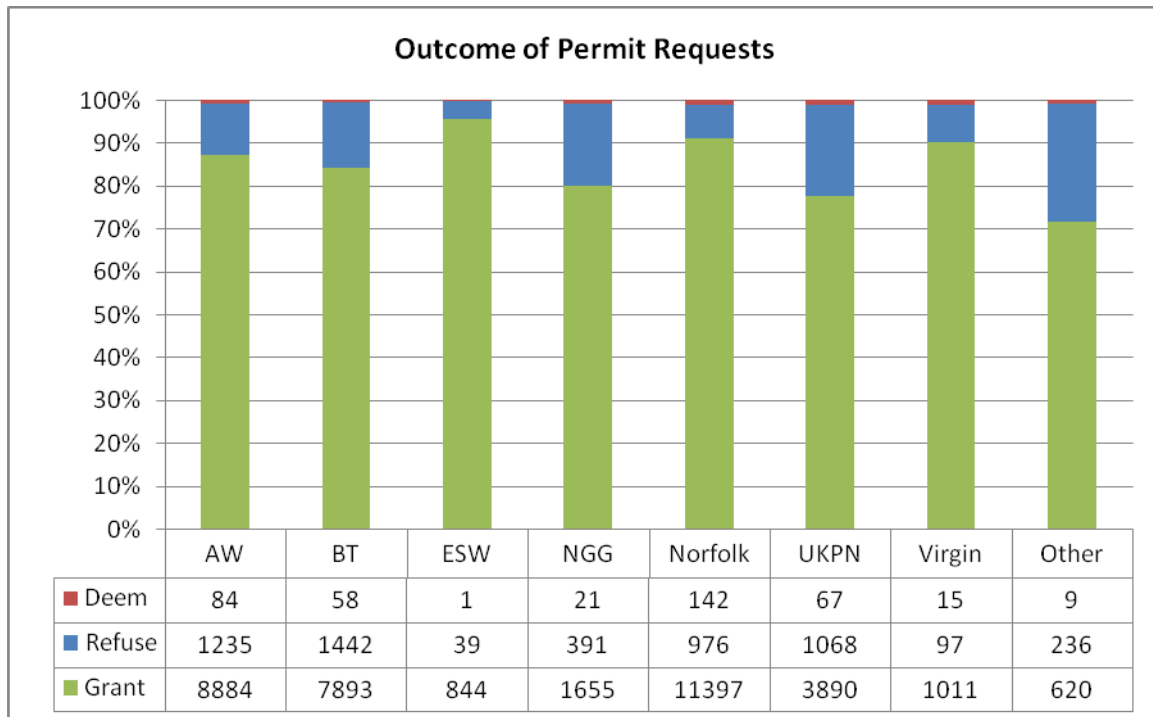


Table 2.2

2.4.1 The above table provides a breakdown of KPI 1 showing the 7 largest promoters. The remaining 12 smaller promoters are summarised collectively.

## 2.5 KPI2 - The number of conditions applied by condition type

Conditions	Highway Authority		Utilities	
	Number	% Permits Issued	Number	% Permits Issued
1- 3. Date & time constraints and out of hours work	5712	41.0%	10460	35.7%
4. Materials and Plant Storage	278	2.0%	2628	9.0%
5. Road Occupation Dimensions	155	1.1%	557	1.9%
6. Traffic Space Dimensions	4048	29.0%	20486	69.9%
7. Road Closure	643	4.6%	1406	4.8%
8. Light Signals and Shuttle Working	2403	17.2%	4329	14.8%
9. Traffic Management Changes	679	4.9%	792	2.7%
10. Work Methodology	648	4.6%	273	0.9%
11. Consultation and Publicity	873	6.3%	828	2.8%
12. Environmental	93	0.7%	126	0.4%
13. Other *	0	0.0%	1	0.0%
14. Local	1211	8.7%	2467	8.4%

\* started April 2015 with introduction of NCT

Table 2.3

- 2.5.1 The above table indicates that permit applications were received by both external and internal works promoters which had conditions applied.
- 2.5.2 The National Model Condition texts (NMC) were used from the start of the scheme. The scheme migrated to the National Condition Texts (NCT) on 1 Apr 15. The table shows the use of both types of conditions.
- 2.5.3 It is considered that there may be an overuse of conditions relating to date/time constraints and traffic space dimensions. A small audit of permit applications using these two conditions indicates that the restriction being imposed on the works was not always justified. On occasion, the condition conflicted with other data in the application.

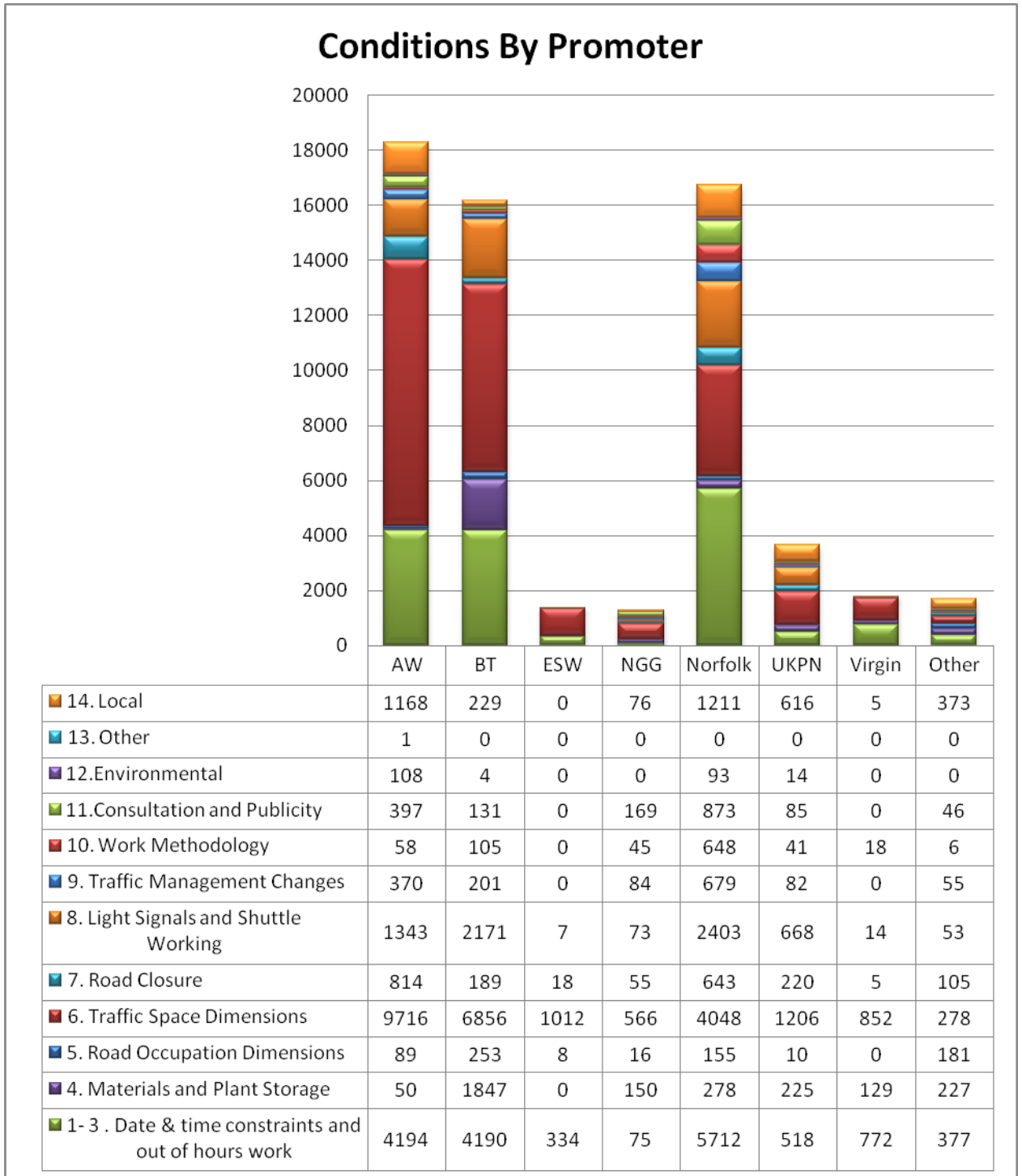


Table 2.4

2.5.4 The above table provides a breakdown of promoters showing their use of the different condition types.



2.6 KPI3 - Number of approved extensions

	Highway Authority		Utilities	
	Number	Percentage of Total	Number	Percentage of Total
Number of Permits Issued	11397		24797	
Number of requests for extensions	156	1.37%	626	2.52%
Number of agreed extensions	152	1.33%	615	2.48%
Number of extensions refused	4	0.04%	11	1.76%

Table 2.5

2.6.1 The above table indicates that permit applications were received by both external and internal works promoters which had a need for the duration of the works to be extended. Some of these requests were refused.

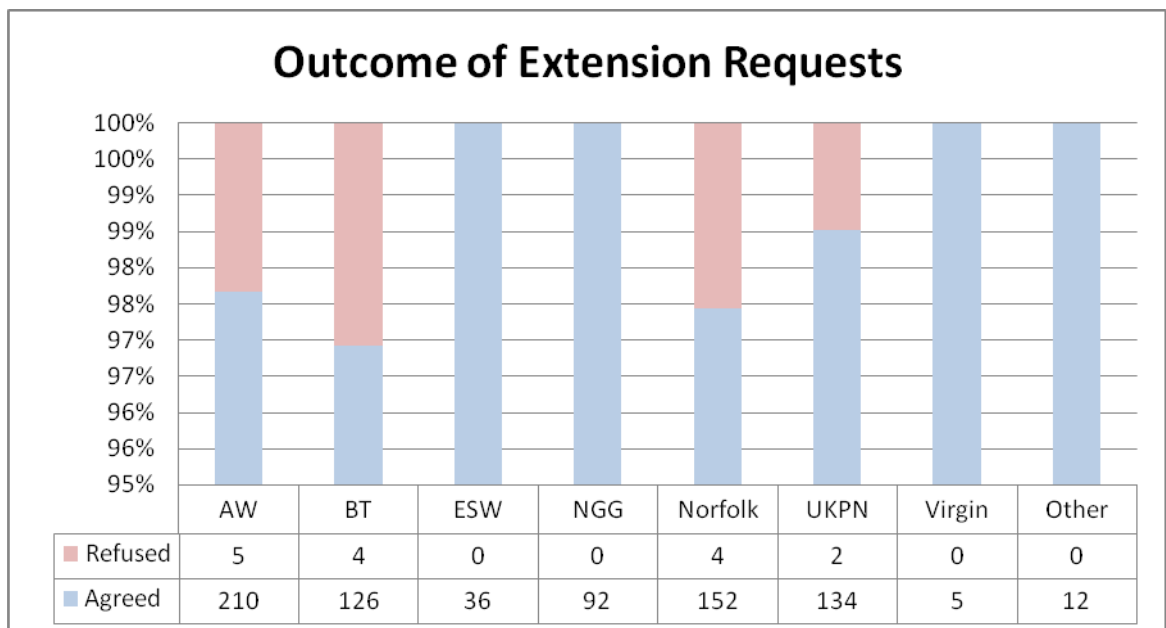


Table 2.6

2.6.2 The above table provides a breakdown of the outcome of duration extension requests. This shows that both internal and external promoters have some applications refused.

2.7 KPI4 - the number of occurrences of reducing the application period

	Highway Authority		Utilities	
	Number	Percentage of Total	Number	Percentage of Total
Number of Permits applications made	16163		37428	
Number of requests to reduce the notification period	1434	8.87%	1293	3.45%
Number of agreements to reduce the notification period	1431	8.85%	1289	3.44%
Number of Early starts Refused	3	0.02%	4	0.01%

Table 2.7

2.7.1 The above table indicates that permit applications were received by both external and internal works promoters which had a need for an early start. Some of these requests were refused.

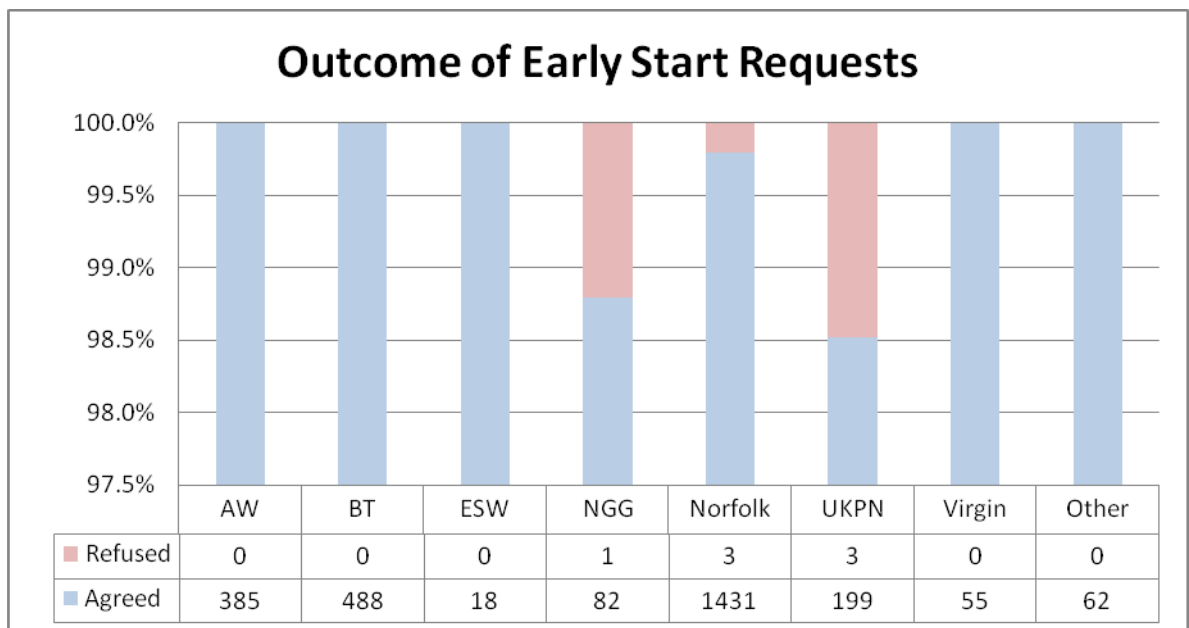


Table 2.8

2.7.2 The above table provides a breakdown of the outcome of early start requests for each promoter. Both internal and external promoters had some requests refused

2.8 KPI5 - number of agreements to work in S58 and S58A restrictions

	Highway Authority		Utilities	
	Number	Percentage of Total	Number	Percentage of Total
KPI5A - number of applications to carry out works under a s.58 or 58A restriction is in place, other than the allowed exceptions	2		21	
Number of agreements for s. 58 & s58A	1	50.00%	18	85.71%

Table 2.9

2.8.1 Where substantial road or street works are completed it is possible to prevent future planned works taking place in that street for a period of between 6months and 5years. Where a promoter wishes to carry out works in a restricted street they must first obtain agreement from the highway authority.

2.8.2 The above table indicates that permit applications were received by both external and internal works promoters which required excavating a street where a restriction was in force. Some of these requests were not approved.

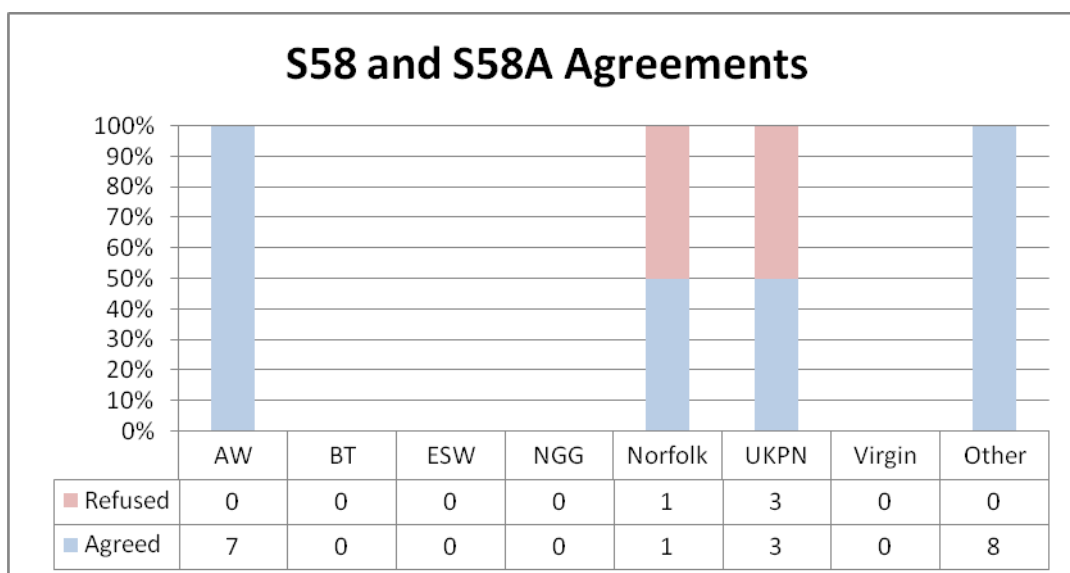


Table 2.10

2.8.3 The above table provides a breakdown of the outcome of requests to work in restricted streets for each promoter. Both internal and external promoters had some requests refused.

2.8.4 There are currently 101 restrictions in force in Norfolk.

2.8.5 The number of refusals is relatively very low compared to the number of activities that take place and the number of restricted streets. This indicates that the forward planning co-ordination process is working well.

### 3.0 Additional Performance Measures

- 3.1 Key Performance Indicators 6 to 9 represent the non-mandatory measures which apply to the Norfolk Permit Scheme. These results are set out below together with an indication of what we feel they show.
- 3.2 These measures were first produced in September 2014 and have been shared with all promoters each month since October 2014.
- 3.3 Unfortunately there is no national specification on how the indicators are to be compiled. The Technical Specification for the electronic transfer of notices, the Code of Practice for Permits and national Permit Guidance do not always align with each other. There also appears to be inconsistencies between the software systems used to maintain the permit register and that used by works promoters to manage their permits. Norfolk has used the following principles in producing the monthly data:-
- There is a complex relationship between phases, works and cancellations which results in these reports not being able to consider cancellations with the exception of KPI6.
  - Permits applied for in one month may have been cancelled, refused or amended the following month and counted in that different month accordingly. This can unbalance the result for smaller promoters.

#### 3.4 KPI6 - Cancelled permit requests

	Highway Authority		Utilities	
	Number	Percentage of Total	Number	Percentage of Total
<b>KPI6A</b> - total number of permits issued	13940		29307	
<b>KPI6B</b> - total number of permits requested	16163		37428	
<b>KPI6C</b> - total number of permits cancelled before the permit has been granted shown as a % of permits requested	552	3.42%	2444	6.53%
<b>KPI6D</b> - total number of permits cancelled after the permit has been granted as a % of permit granted	2620	18.79%	5473	18.67%

Table 3.1

- 3.4.1 The above table indicates that permit applications were received by both external and internal works promoters which were subsequently cancelled. Some of the cancellations were received before the permit had been granted which leads to avoidable additional work by the permit authority

3.4.2 The date of the cancellation transaction is used to determine which accounting period transactions are recorded in.

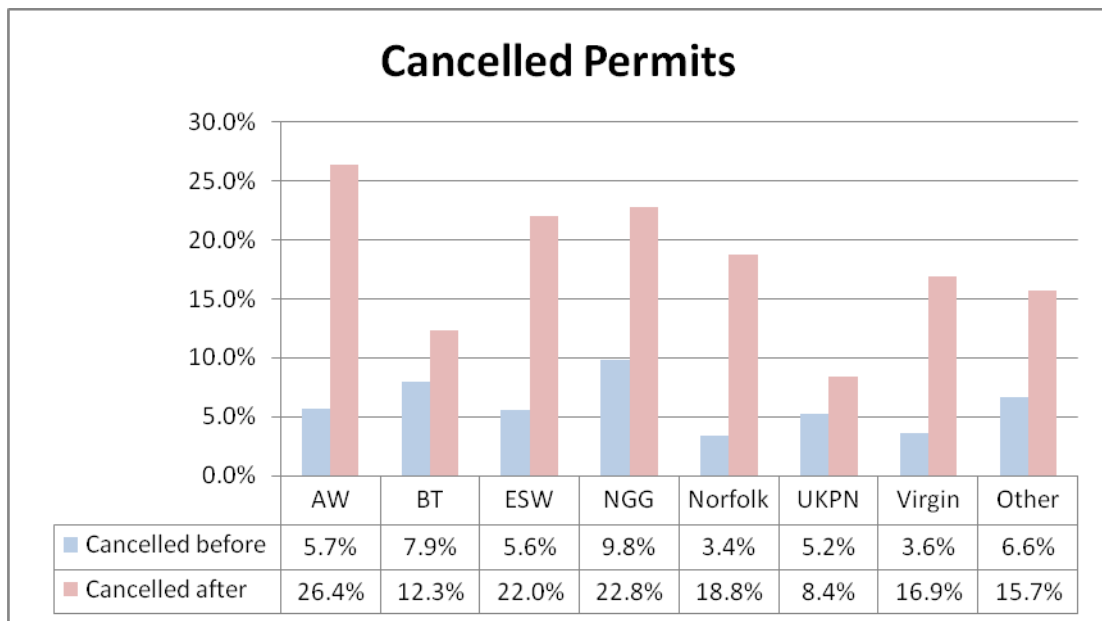


Table 3.2

3.4.3 The above table provides a breakdown of cancelled permits for each promoter and whether that cancellation was made before or after the permit was granted. Both internal and external promoters have a need to make cancellations.

### 3.5 KPI7 Collaborative working

	Highway Authority		Utilities	
	Number	Percentage of Total	Number	Percentage of Total
<b>KPI7A</b> - total number of permits issued	13940		29307	
<b>KPI7B</b> - total number of instances of collaborative working shown as a % of permits granted	3	0.02%	56	0.19%
<b>KPI7C</b> - number of instances where collaborative working has been initiated by the works promoter, shown as a % of permits granted	2	0.02%	29	0.10%
<b>KPI7D</b> - number of instances where collaborative working has been initiated by the Street Authority, shown as a % of permits granted	1	0.01%	27	0.09%

Table 3.3

- 3.5.1 Work can be planned to take place at a time that other works are taking place in that street or nearby. Where two or more works take place at the same time the overall duration of the works is shorter and the overall disruption to the road network can be less. Collaborative working does not just apply to those works where the same trench can be used by two different promoters. In fact, that instance is quite rare. Collaborative working also applies where the same traffic management scheme is shared by both parties (eg, sharing traffic lights) or the same route is worked on by two parties (eg, a promoter taking advantage of a road being closed by another party in order to deliver works at a less disruptive time).
- 3.5.2 It is recognised that more effort is required to time two activities to be delivered in this fashion. To encourage promoters to work in this way all instances of collaborative working are rewarded with a permit of no charge.
- 3.5.3 The above table indicates that collaborative working arrangements were undertaken by both external and internal works promoters..
- 3.5.4 These results do not reflect the anticipated volume of works being delivered in a collaborative way. It was hoped that there would be more

instances of collaboration. It is unclear whether the measure reflects the true number of instances or whether there is reluctance by the promoters to work in this fashion.

3.5.5 It is noted that on many occasions promoters claim to work in this way but a second collaborator cannot be identified. These claims were due to an administrative error by the promoter and are not included in KPI7, nor was a concession awarded.

3.5.6 Conversely, some claims of collaborative working is only claimed by a single promoter, the second promoter failing to update the permit application. That instance is also not captured in this measure.

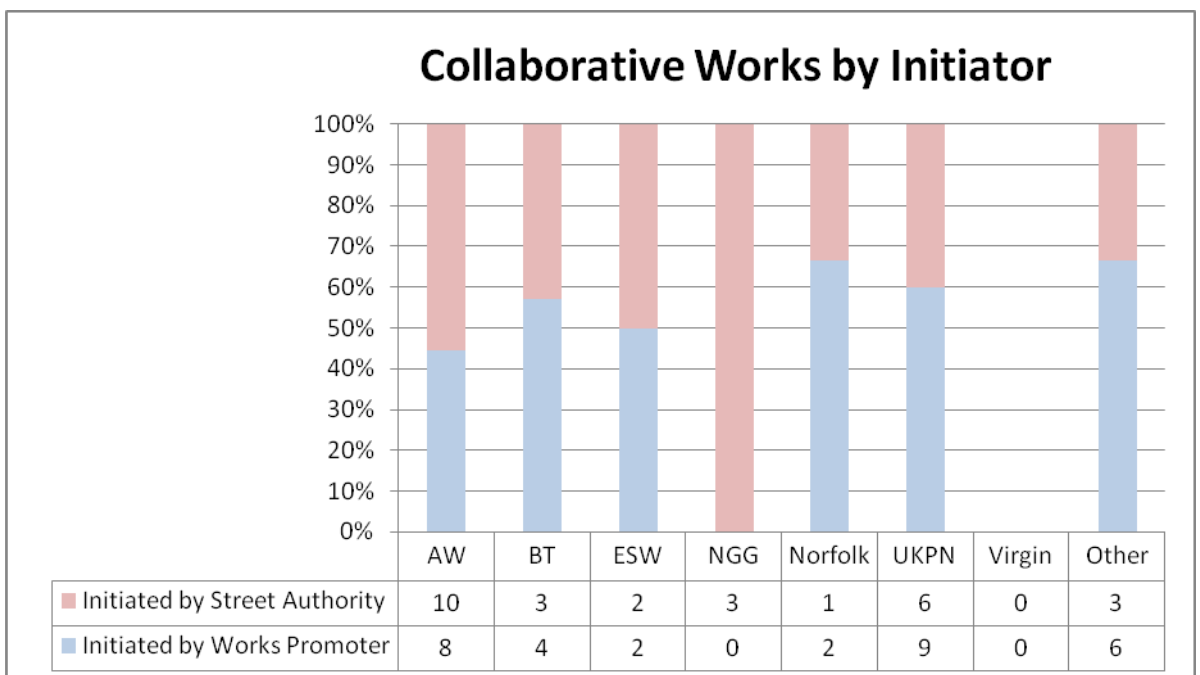


Table 3.4

3.5.5 The above table provides a breakdown of collaborative working for each promoter and which party initiated the collaboration. Both internal and external promoters have worked successfully in this fashion.

3.6 KPI8 First Time Permanent Reinstatements.



	<b>2012-13 Percentage of Total</b>	<b>2013-14 Percentage of Total</b>	<b>2014-15 Percentage of Total</b>
<b>KPI8C</b> -total number of first time permanent reinstatements as a % of permits granted with an excavation type of 14 or 15 or 18	74.3%	79.1%	81.7%

Table 3.5

- 3.6.1 Some works require an excavation in the highway. These excavations are backfilled and reinstated in accordance with the national specification. Some reinstatements are only temporary and must be made to a permanent standard within 6 months. This good practice avoids the need for a return visit to site and so reduces the overall duration and impact of the works. By avoiding the need to excavate the interim material and replace it with a permanent material it also reduces waste and the carbon footprint for the overall works.
- 3.6.2 The above table indicates the number of instances where an external promoter registers a first time permanent reinstatement. To qualify, the works must relate to asset phase of the works, must involve an excavation and not be wholly within the verge. The last three years data is shown.
- 3.6.3 Norfolk County Council's data is not included in these results. As a Highway Authority, their work is completed to a different specification to that of an external works promoter. It could be considered that all work is always completed to a first time permanent standard. As Norfolk is not subject to permit fees they would not be entitled to the concession that this measure applies to.
- 3.6.4 Where a promoter can complete a minimum of 85% of all the qualifying works with a first time permanent reinstatement then, subject to meeting the requirement in KPI9, they would receive a 10% discount off all permit fees that apply the following year.
- 3.6.5 Overall, the target of 85% has not been met. However, it is noted that the success rate of completing reinstatements to a permanent standard on the first visit continues to increase.

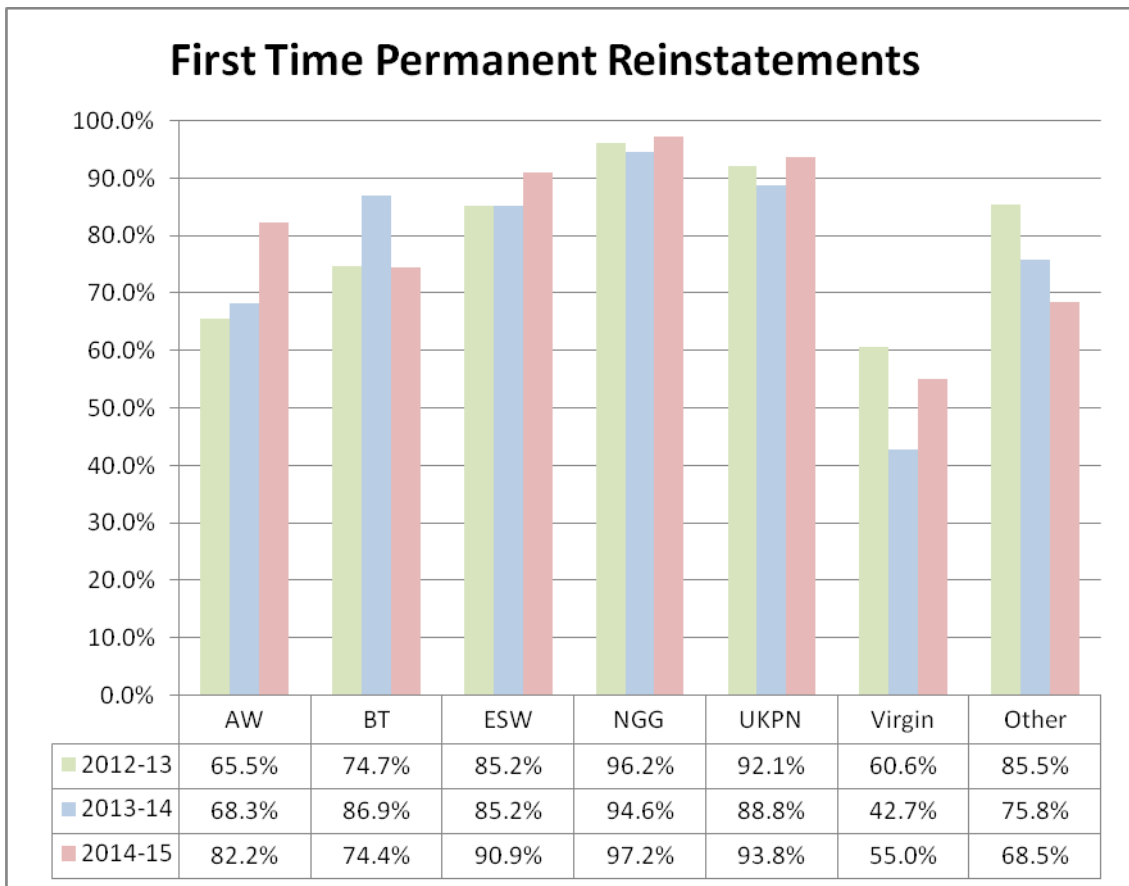


Table 3.6

3.6.6 The above table provides a breakdown of the percentage of works completed to a first time permanent standard for each promoter. The last three years data is shown.

3.6.7 Although seven promoters met the 85% target, two of these did not meet the target required in KPI9. This resulted in fewer promoters than hoped for meeting the target for this concession.

### 3.7 KPI9 Coring Results.

	<b>2012-13</b>	<b>2013-14</b>	<b>2014-15</b>
Total number of core samples successfully tested for thickness & correct use of surface and binder courses	152	266	252
Total number of non-complying reinstatements	47	34	38
Total number of core samples that did not comply shown as a % of cores successfully tested	30.9%	12.8%	15.1%

Table 3.7

- 3.7.1 The above table indicates the number of core samples taken on reinstatements completed by external promoters. The cores taken by NCC are assessed for thickness & correct use of surface and binder courses.
- 3.7.2 Only reinstatements that visually appear to comply with the current Specification for the Reinstatement of Openings in Highways will be selected for sampling. The total number of cores samples that did not comply are shown as a percentage of cores successfully tested.
- 3.7.3 The reinstatements carried out by external promoters must be in accordance with the Specification for the Reinstatement of Openings in Highways. Failure to comply with this national specification could lead to the early failure of the reinstatement. This failure can take place several years after the completion of the end of the guarantee period when it can be difficult to either prove the identity of the promoter that completed the work or to prove the non-compliance that resulted in a continuing offence. The repair would then fall to the public purse to fund.
- 3.7.4 Where a promoter's coring results are no worse than having a 10% failure rate then, subject to meeting the requirement in KPI8, they would receive a 10% discount off all permit fees that apply the following year.

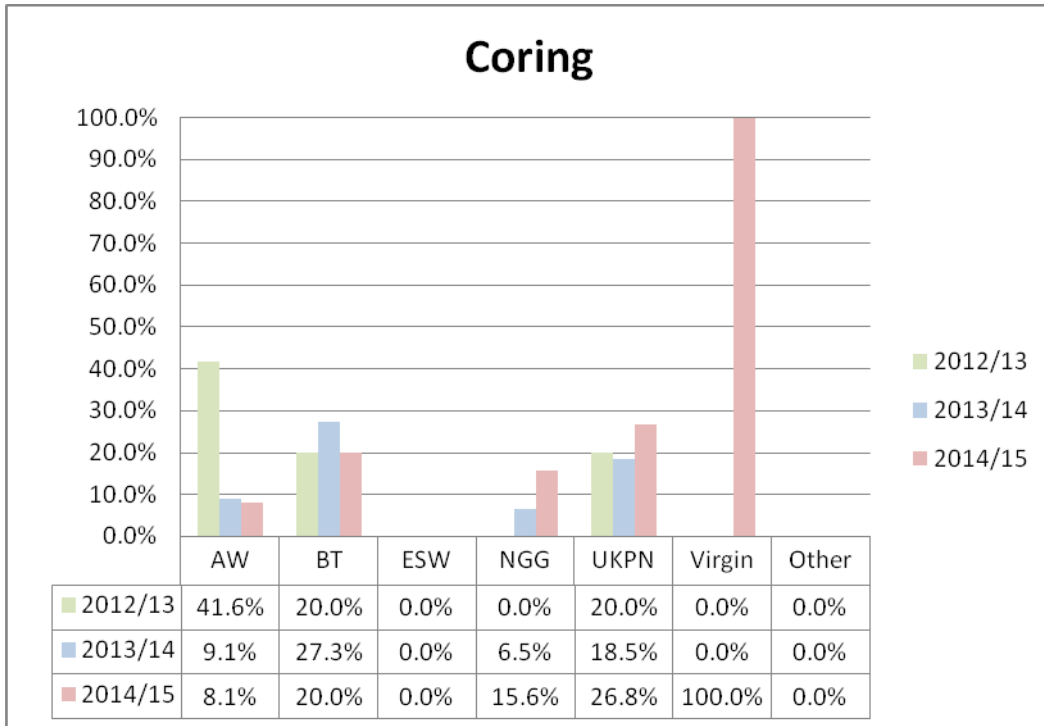


Table 3.8

3.7.5 Although 14 promoters met the 10% target, 9 of these did not meet the target required in KPI8. This resulted in fewer promoters than hoped for meeting the target for this concession.

### 3.8 S81 Defective Apparatus

3.8.1 There are occasions where the permit authority finds defective surface apparatus owned by a utility. In these instances Norfolk serves a S81 notice on the relevant promoter so they are aware that a repair is required.

3.8.2 The Norfolk Permit Scheme recognises that an early repair is to the benefit of the public and rewards a promoter with a free permit whenever the repair is completed within 21 calendar days of the S81 being given. Works completed under an immediate permit application are excluded from this measure.

3.8.3 Unfortunately, it is not possible to calculate the percentage of repairs completed that met the concession trigger level. Only the numbers that were completed on time are retrievable from the financial records.

S81 Free Permits	Number awarded
AW	55
NGG	4
BT	26
UKPN	1
E&SW	1
Grand Total	87

Table 3.9

3.8.4 The above table indicates the number of S81 defects that were successfully completed on time and were rewarded with a free permit.

### 3.9 National Highways & Transportation Survey 2014

3.9.1 This survey is carried out by Ipsos MORI for several local councils across Britain. The survey has been designed by local councils to inform local transport planning and will inform decisions about what to prioritise and how to spend public money. Included in the survey are specific questions relating to street works and tackling congestion.

3.9.2 The results of the survey are published annually and compare public perception between the authorities that take part. This survey includes topics relevant to tackling congestion.

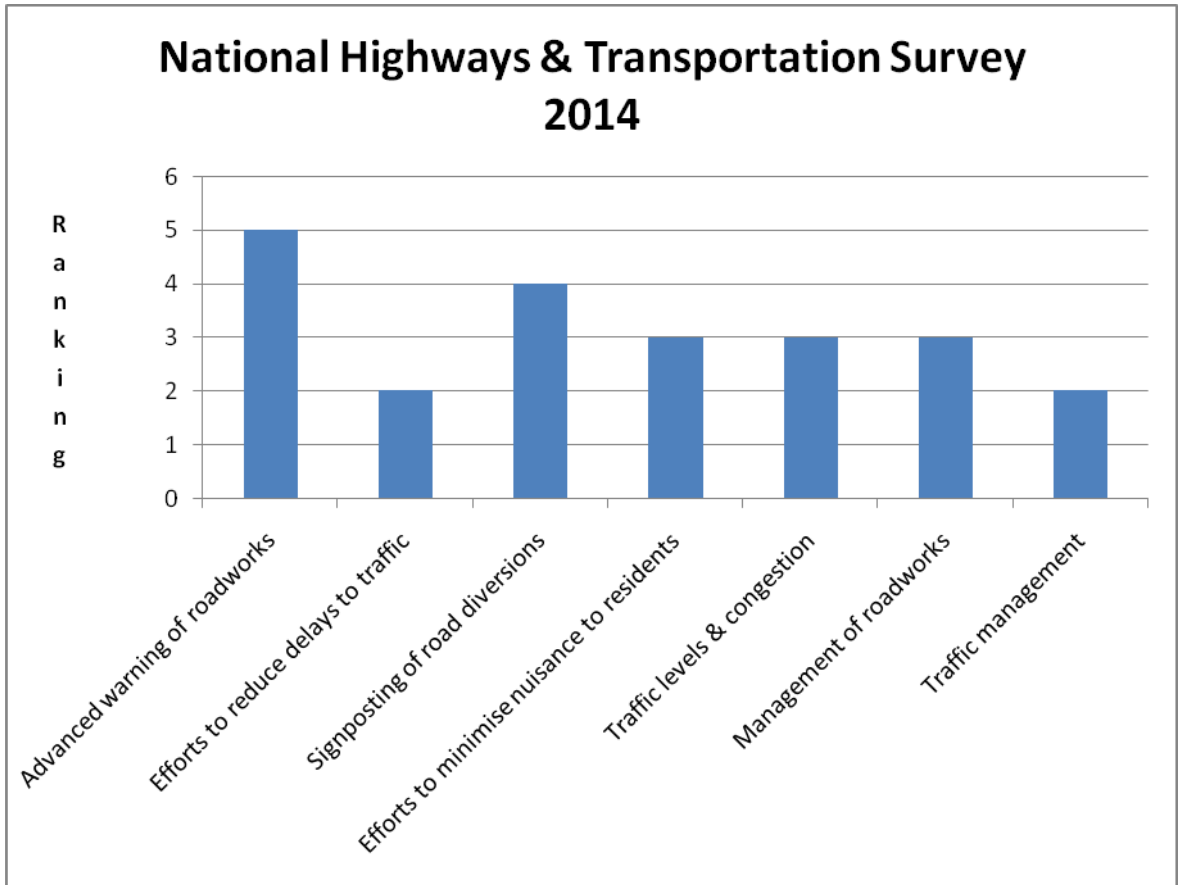


Table 3.10

3.9.3 The above table indicates the ranking of Norfolk County Council for each topic when compared to the other 24 authorities that took part.

## 4.0 Conclusions

### 4.1 Scheme Objectives

- 4.1.1 The objective of the Traffic Management Act is to enable the management of the highway network to ensure expeditious movement of traffic (including pedestrians, cyclists and other vulnerable road users) as required under the TMA Network Management Duty.
- 4.1.2 Under a permit scheme it is intended to enable more effective co-ordination to empower the Local Highway Authority to minimise disruption from both street and highway works
- 4.1.3 The strategic objective for the Permit scheme is to provide a capability to manage and maintain the local highway network for the safe and efficient use of road space, whilst allowing promoters access to maintain their services and assets.
- 4.1.4 The principle of the Permit Scheme is to improve the planning, scheduling and management of activities so that they do not cause unnecessary traffic disruption to any road user (including pedestrians). It will help Norfolk County Council meet their network management duty under the Traffic Management Act. Coordination of activities through the Permit Scheme will enable differences between those competing for space or time in the street, including traffic, to be resolved in a positive and constructive way.
- 4.1.5 The Norfolk permit Scheme has just completed its first year of operation and many trends and changes in behaviour will not yet be fully documented. However, the key performance indicators and conclusions below suggest that the strategic objectives and principles of the scheme are being met.

### 4.2 Greater Control and Visibility of Road and Street Works.

- 4.2.1 The introduction of the Norfolk Permit Scheme has required all works promoters to improve the way in how they plan works affecting the road network. Permission must now be sought and obtained before commencing on site. Conditions are applied to permits where they bring a benefit to the travelling public or community that is directly affected by the works. Permit applications must be given in a timely manner.
- 4.2.2 Permit applications that are found to be incomplete or inaccurate can be subject to a required change or can be rejected.
- 4.2.3 Previously, under the noticing regime, works were allowed to commence several days after their proposed start date and still retain

the duration that was proposed. This 'validity period' gave flexibility to the promoter on when the works could commence but did little to inform the travelling public or the community affected when the works would commence. Under a permit scheme this validity period does not apply to works in the busiest streets.

4.2.4 This has led to more accurate and reliable data that can be used to help Norfolk County Council to meet its network management duty and the duty to maintain a permit register. It has given more visibility to planned and unplanned works.

4.2.5 The National Highways and Transport Survey ranked Norfolk County Council 3<sup>rd</sup> out of the 25 authorities in the survey. The most positive trend in the results of this survey for Norfolk County Council was the public perception of advanced warning of road works.

### 4.3 Parity

4.3.1 The mandatory and additional performance measures demonstrate that parity is being applied across all works promoters.

### 4.4 Occupancy

4.4.1 Data exists in the register that can be used to calculate the sum of the number of days which road and street works were in place on the road network. The data used is based on working days, excludes scheme in excess of 50 working days and those that have not yet been completed.



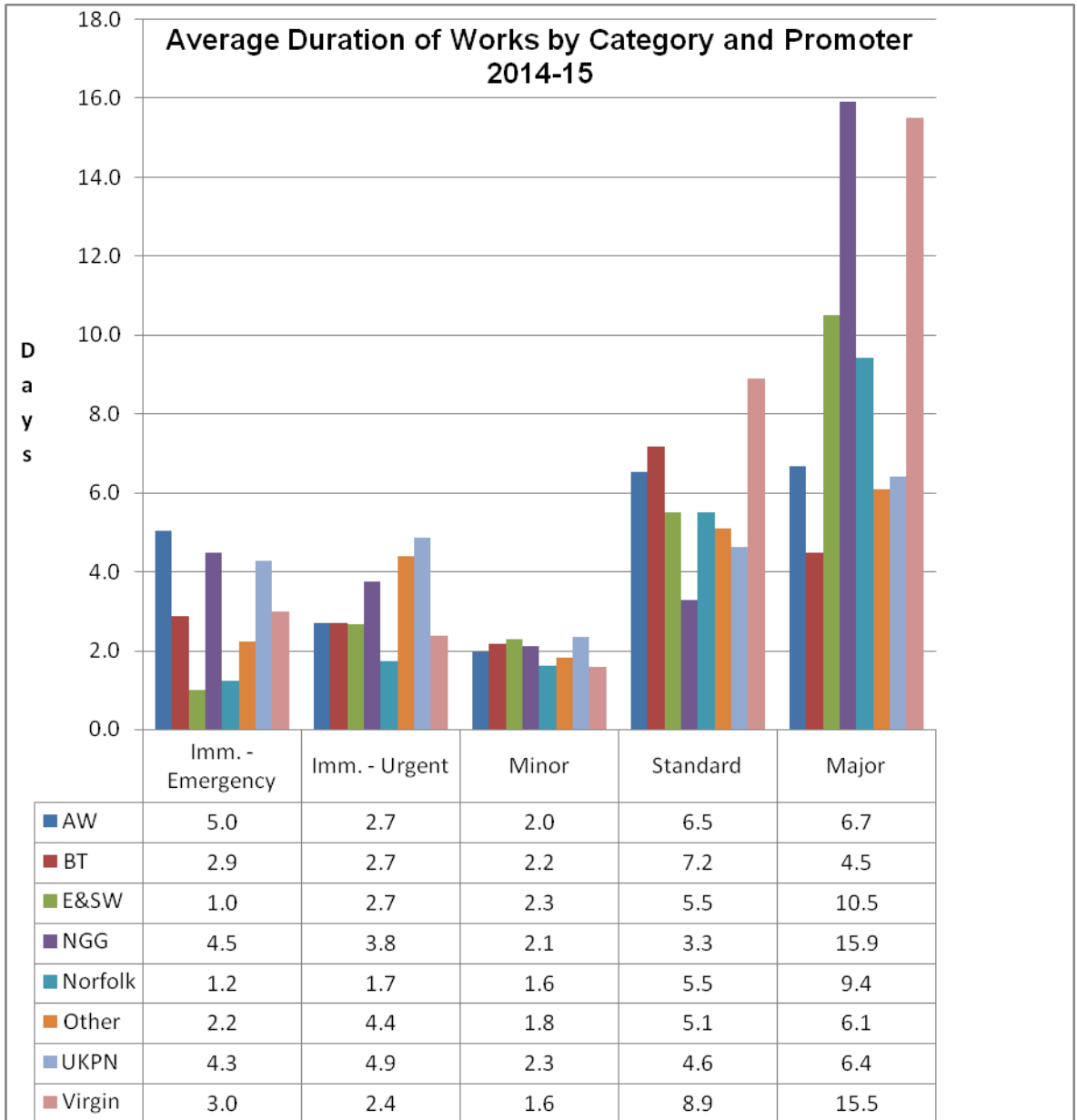


Table 4.1

4.4.2 The above table indicates the average duration in working days of each notice type for each promoter for the 2014/2015 year.

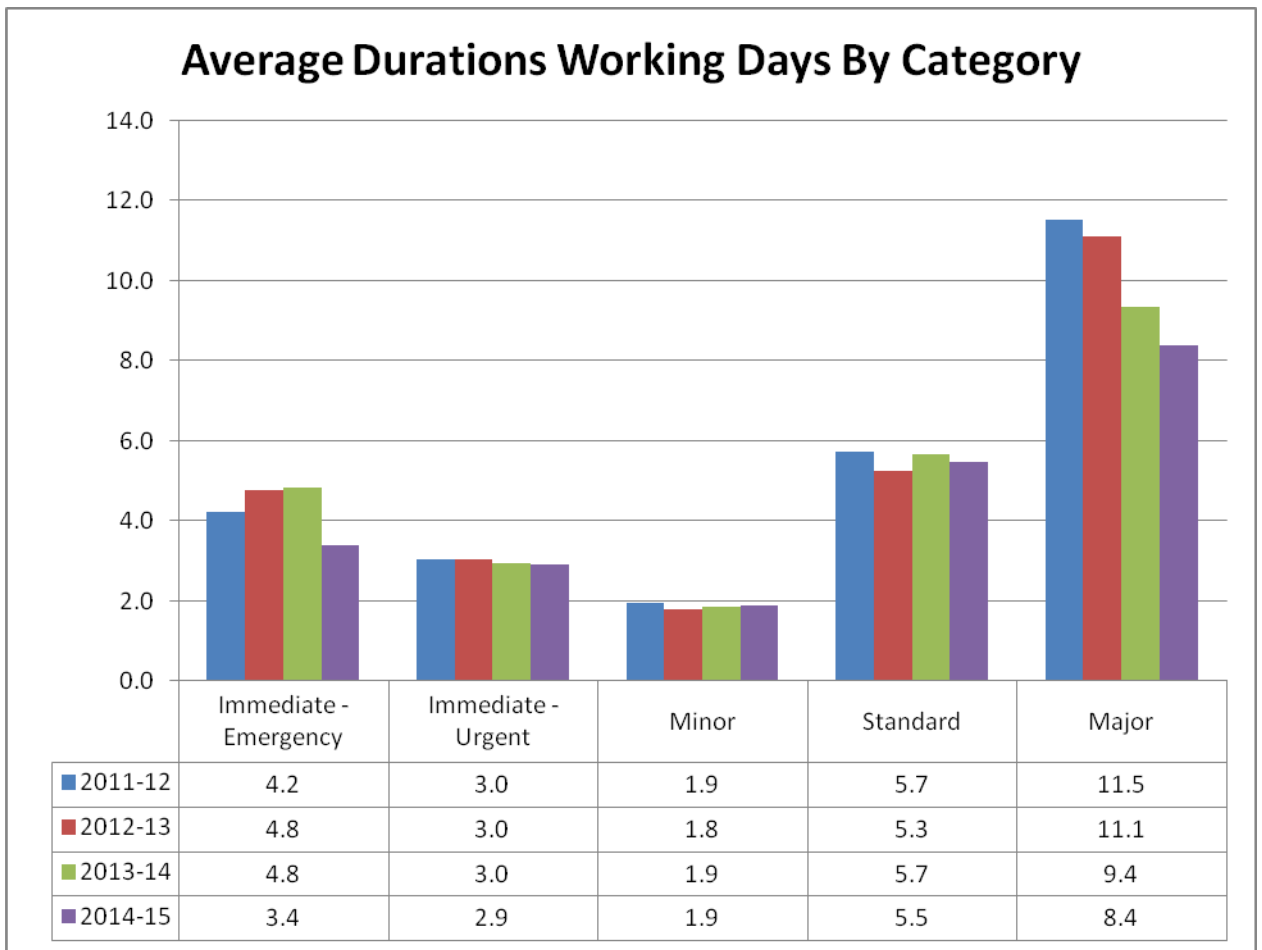


Table 4.2

4.4.3 The above table indicates the average duration in working days of each notice type for each promoter for the previous four years. The average duration of works is reducing over time.

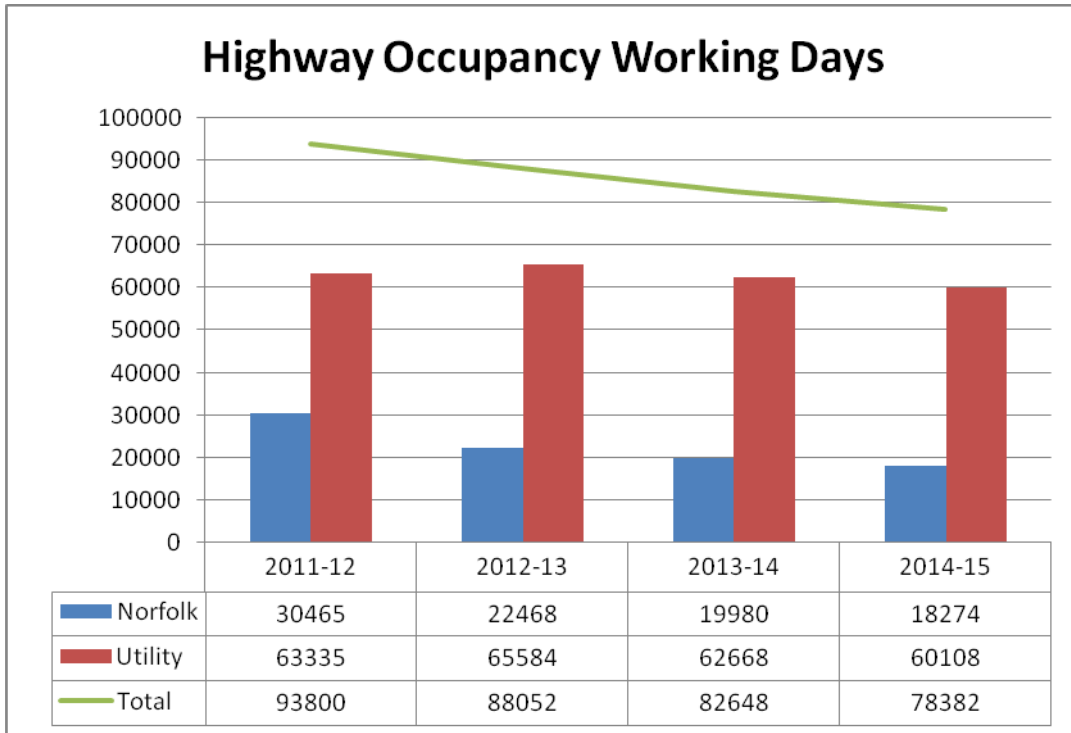


Table 4.3

- 4.4.5 The above table indicates the number of working days where internal and external works took place in the highway. The overall occupancy of the road network is falling over time.
- 4.4.6 The apparent fall in duration and overall occupancy of the road network cannot be directly attributed to the Norfolk Permit Scheme. However, the early indications appear positive.

#### 4.5 Collaborative Working

- 4.5.1 KPI7 indicates a lower than anticipated level of collaborative working. This good practice is rewarded with a fee not applying to the permits required by the parties involved.
- 4.5.2 It is incorrect to assume that such rewards only relate to trench sharing. The Norfolk Permit Scheme extends the definition of collaborative working to those works which share just the traffic management, or to those works which are deliberately timed to coincide with another promoter in that street or route providing that the timing brings benefit to the public.
- 4.5.3 To help promote this good practice Norfolk has not applied the part concession identified in S15.6.1.h.i of the scheme. Instead a full refund is given and not a part refund as originally intended.

4.5.4 It is unclear as to why the results appear low. More work is required to investigate possible explanations:-

- Are the works being recorded correctly in accordance with in the Eton Technical Specification.
- Are there fewer opportunities to work collaboratively than originally anticipated.
- Are promoters not engaging with this good practice.

4.5.5 This will be considered in more detail in the second year and reported in the second annual report.

#### 4.6 KPIs 8 and 9, Reinstatements and Coring Results

4.6.1 Together, these measures identify the quantity of reinstatement completed correctly and during the first visit to site. This reduces the need for a return visit to site, the overall duration required to complete the works and minimises the impact of those works on both the road network and the environment.

4.6.2 The historical data from the previous two years indicate that in the year leading up to the permit scheme going live and within the first year of the scheme there has been an improvement to the number of first time permanent reinstatements and to the way the reinstatements are completed.

4.6.3 However, only five promoters qualified under both of these measures in this first year. Although this was fewer than had been anticipated it is noted that some promoters had only narrowly missed meeting one or both of the targets.

4.6.4 The targets for the second year of operating the Norfolk Permit Scheme should change from 85% to 85.5% for KPPI 8 First Time Permanent Reinstatements and from 10% to 9.5% for the Coring Results. Norfolk County Council feels that making the targets more difficult to achieve will do little to encourage promoters to adopt this good practice, especially as some had come quite close. The target levels for KPIs 8 and 9 shall therefore remain at the year one levels of 85% and 10% for year two of the scheme.

#### 4.7 Annual Report Timing

4.7.1 This annual report is required at the end of the first year of operating the permit scheme. An annual report is required each year for the first three years and then every third year thereafter.

4.7.2 The anniversary of the Norfolk Permit Scheme falls on the 6 May. KPIs 8 and 9 specifically relate to the financial year between 1 April and the 31 March. The resulting concession from these measures also specifically relates to the financial year.

4.7.3 The definition of the year relating to the concession was given by the external promoters at one of the Permit Forums which were held to help develop the scheme.

4.7.4 It is proposed that future annual reports align to the financial year. Although that would result in a small overlap of data recorded in years one and two it will provide more meaningful data in alignment of the finances of external promoters and supply chain contracts.

#### 4.8 Use of Conditions

4.8.1 There appears to be inconsistencies in how and when certain condition types are needed. This may have increased the number of conditions being attached to applications and increased the administration of both the promoter and permit authority.

4.8.2 Norfolk will work with the Anglian Region to help agree a single interpretation of the use of the National Condition Texts.

4.8.3 Once a unified approach has been developed Norfolk will help identify incorrect usage to promoters with a higher than average ratio of conditions used to applications made. The aim is for future conditions to bring more value to the permit application and to the public.

#### 4.9 S81 Defective Apparatus

4.9.1 It is felt that the overall number of repairs completed on time has improved.

4.9.2 To enable a better production of statistics on this area Norfolk will adopt the national process for the issuing of electronic S81 defects from 1 Aug 15.

4.9.3 The Norfolk Permit Scheme set a target for the S81 related repairs to be completed within 21 calendar days of the S81 notice being issued. This trigger would fall by one calendar day each subsequent year for seven years. In the second year of the Norfolk permit Scheme the trigger level will fall to 20 calendar days in the hope that this drives a continued improvement to performance.