

# Staffordshire County Council

## Fibre Streetworks Toolkit: The Staffordshire Approach

March 2023



## Change Control

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# 1. Introduction

Staffordshire County Council recognises that digital connectivity is an enabler for us to become an innovative, ambitious and sustainable county, where everyone has the opportunity to prosper, be healthy and happy.

A key priority of Staffordshire County Council's [Strategic Plan 2022-26](#) is to improve digital connections and to use digital technology to connect, inform and support the people of Staffordshire. Our [Digital Infrastructure Strategic Framework \(DISF\)](#) sets out key objectives to accelerate delivery of gigabit capable technologies, maximising the opportunities and benefits for the businesses and residents of Staffordshire to enable the growth of our digital economy. To maximise the use of public sector assets, develop lucrative internal and external networks as well as contributing to and influencing policy to facilitate delivery and to reduce digital exclusion whilst supporting our climate change agenda.

This document is intended to act as a local supplement to the Street Works Toolkit for Fibre Deployment in England & Wales Version 2.0 with additional information about the requirements and expectations of Staffordshire County Council (SCC) as a Highway Authority.

The Department for Transport (DfT) and The Department for Science, Innovation and Technology (DSIT) have indicated they are looking to Highway Authorities and Utilities to assess this toolkit and select the recommendations that are best suited to their local circumstances. As such, Staffordshire County Council have endeavoured to clarify our expectations of fibre utilities and existing best practice we would like to see implemented on our highway network.

We believe that collaboration is key to a strong, cooperative working relationship between Staffordshire County Council and the various utilities looking to complete the widespread rollout the install and maintenance of fibre apparatus on the highway network.

By working together and engaging at every stage of the ultrafast broadband project rollout, we aim to build up an environment of trust and confidence in each other to work together in a fair and consistent manner that allows for flexibility where appropriate to do so.

Further information can be found in the [Street Works Toolkit](#).

## 2. Early Engagement

Staffordshire County Council would expect fibre utilities and any associated contractors to engage with us at the earliest opportunity prior to any network build planning. We would request that engagement occurs up to 6 months prior (or even sooner, if at all possible) to any civils works commencing with an outline of the following:

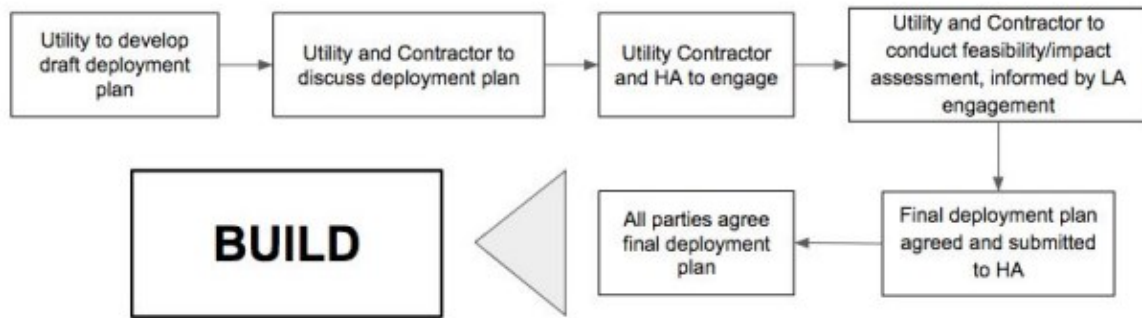
- Locality of the proposed work
- Duration of the proposed work
- Scale of the proposed work (how many properties/streets are likely to be affected)

This will allow Staffordshire County Council to assess the proposals and consider these against any other demands and considerations on the highway network. We will endeavour to provide guidance around the proposals presented to us and discuss how to achieve the delivery of the installation of assets whilst minimising the disruption this may cause to the public.

Your first points of contact that will need to be engaged with at Staffordshire County Council at the pre-build stage are listed below, once the programme is starting to be developed and details are confirmed, these will need to be communicated to the Traffic & Network Management Team where the appropriate area Coordination & Inspections Managers will assess the detailed proposals.

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## **How, What, When?**



## **HA-Utility information/issues to cover**

In addition to the information in the pre-build template agenda, Staffordshire County Council will also signpost the following:

- Political hotspots/challenging locations
- Any embargo periods and locations
- Where engagement with district/borough council planning departments is required

With regards to the utility providing evidence of past performance in Street Works, Staffordshire County Council may engage with the relevant Highway Authorities to verify this.

If the scope of works being proposed will put a significant strain on the Staffordshire County Council Traffic & Network Management Team, we would be looking to discuss the potential for additional funding to be considered by the utility.

With regards to good practice considerations Staffordshire County Council can clarify the following points:

***Fee Exemptions*** – SCC would not be looking to apply fee exemptions as standard for lower category streets/non-traffic sensitive streets and parking bays. However, we are open to discussing requests on an individual basis on occasion.

***Innovation Test Sites*** – This would need to be discussed with the Traffic & Network Managers and their representatives before any agreement could be made.

***Mobile Works*** - This is not currently a working method that SCC are looking to implement but this will be taken under consideration for future schemes.

**Works Inspections/Supervision** – SCC would be looking to agree a sample inspection volume with the utility and any inspections would be carried out in line with the NRSWA Code of Practice for Inspections. Poor performance could result in an increased inspection regime.

**Communications Strategy** – This would need to be discussed with SCC before being implemented and we would require the utility to provide us with copies of any communications that are going to be sent to residents and businesses to ensure the message being delivered aligns with the Highway Authority approach and standards.

**Handling of Reactive Works** – We would require a permit to be submitted 'with excavation' and reflecting the accurate Traffic Management being used on site. We do not believe these would typically warrant an Immediate category permit and would require this work to be planned in with the correct lead in time and an early start request submitted via works comment if the utility would like to commence works sooner. In the rare instance that the utility believes an immediate permit is warranted, a phone call is to be placed with one of the Traffic & Network Officers for the area, to discuss the circumstances further.

## **Continued Engagement**

Staffordshire County Council support the approach of regular communication and splitting this into 2 categories:

**Strategic** – To be arranged with Paul Chatwin & Idris Roberts, Lee Barnard & Hayley Fletcher.

**Operational** -To be arranged with the operational Traffic & Network Management Team.

## **'Dig Once'**

This is currently being explored within Staffordshire County Council but there are no current arrangements in place to proactively install ducting.

## **Utility Planning**

Staffordshire County Council are placing specific emphasis on the advice to approach us with honesty when things do not go to plan on site at the undertaker's earliest opportunity, so that we can work with the utility to find an agreeable and reasonable solution.

## **Going the extra mile**

Staffordshire County Council are willing to enter into discussions regarding this matter with the individual utility companies but would stress that this is heavily dependent on the level of cooperation displayed by the utility company if deviations from the NRSWA Code of Practice are being requested.

### **Inspections Regime**

Staffordshire County Council would be keen to discuss and agree a sample inspection target/regime with each individual promoter. This would be agreed before works commenced and would take into consideration the volume of expected permits and similar agreements that may have previously been made with other promoters to ensure parity as much as possible.

### **S.58 footway restrictions**

In order to support the implementation and rollout of the fibre network, SCC have committed to suspending our slurry sealing programme for the next 2 years. This will ensure any potential S.58 restriction blockers are reduced & removed wherever possible. However, for any existing In Force S.58 restrictions, please contact our Traffic & Network Inspections Manager for the relevant area to discuss potential access and reinstatement requirements.

### **Getting permission for the installation of broadband in or near to protected nature sites in England**

Staffordshire has several protected nature sites which can be identified [here](#). If your proposed work impacts any of these areas then engagement with Defra & Natural England as per [BDUK guidance](#).

### **Community Engagement & consultation**

Staffordshire County Council will require companies to engage with the communities that will be impacted and disrupted prior to work commencing on site. The level of engagement may differ dependant on location & scope of work which will be assessed by the relevant Coordination Managers and communicated accordingly. Methods that could be required include but are not restricted to: Advance Warning Signs, letter drops (the content of which is to be reviewed by SCC before circulation) and public engagement meetings.



### **3. Permitting, Noticing and Traffic Management**

Staffordshire County Council joined the already established West and Shires Permit Scheme on 1<sup>st</sup> April 2020.

The scheme is intended to be used as a tool to improve network management through more proactive control of roadworks. Our main request to fibre utility companies would be for open, timely and, above all, **honest** communication about programmes of works, delivery expectations and any issues encountered on site.

By complying with the above request, this will allow Staffordshire County Council to apply discretion and offer increased flexibility with regards to network access and permit management.

#### **Applying Section 74 regulations**

Works extensions are not likely to be denied or S74 overrun charges imposed as long as any site issues have been clearly communicated, at the time of identification, to our Traffic & Network Management Team along with any supporting evidence. Please do not leave extension requests until the last 1-2 days of the permit as these will likely attract S74s overrun fees and do not submit these through Street Manager without first consulting one of the Traffic & Network Officers for the relevant area.

#### **Traffic Management Considerations**

To avoid disconnects & miscommunications between the various planners, contractors, and our Traffic & Network Management Team, SCC would recommend that collaborative pre-site visit(s) are conducted before permits start to be submitted for assessment.

#### **Issues that arise in the permitting, noticing and traffic management processes:**

##### ***Variation of permit schemes across the country***

The WaSP scheme complies with the HAUC (England) Operational Guidance for Permit Schemes

##### ***Fees adding up***

Staffordshire County Council fees are not currently at the maximum allowable and are open to discussions with regards to applying discounted fees based on innovative approaches to ways of working that may be

presented to us and instances where collaborative working can be arranged. These must be discussed with the relevant area Traffic & Network Coordination Manager so these can be agreed and confirmed in writing.

### ***TTROs, parking bay discounts***

Again, open, timely and honest communication with regards to programmes of work and traffic management required could result in a reduction in TTROs/parking bay waivers being charged for but this must be discussed with the relevant area Traffic & Network Coordination Manager so these can be agreed and confirmed in writing.

### ***Other Planning Issues (e.g., parked vehicles)***

Arrangements to combat these issues can be made such as agreements for pre-coning to be done the day before and outside of the official permit duration dates but this must be discussed with the relevant area Traffic & Network Coordination Manager so these can be agreed and confirmed in writing.

### ***Road Closures***

Blanket road closure orders are not going to be considered within Staffordshire due to the lack of control and visibility these provide, along with the high demand for network space being realised. However, as per the point above about TTROs, some flexibility may be offered based upon discussions held with the relevant area Traffic & Network Coordination Manager.

### ***LAs overwhelmed by number of permit applications***

Staffordshire County Council plan to monitor permit volumes and may enter into discussion with the undertakers regarding this with the potential for dedicated resource being offered at the expense of the undertaker if this is deemed to be a concern.

### ***Forward planning notices and early starts***

Permits should always be submitted for a date that provides the correct legislative lead in time. If an early start is required, this will need to be requested in a separate Works Comment detailing the revised date being requested and the reason why. Our Traffic & Network Officers will provide an early start reference via a return Works Comment when granting/modifying the permit if the request is acceptable. The Permit Variation Application can then be submitted for the new dates. Failure to do this will result in the original permit application being refused for failure to provide the correct legislative lead in time.

### **Error corrections**

A Works Comment must be sent requesting a reference before any Error Correction is put through the permitting system. Failure to do so could result in an FPN and could erode the relationship of trust between Staffordshire County Council and the utility, it could also result in a Fixed Penalty Notice (FPN) being issued.

### **Works starts and Stops**

These must be submitted within 2 hours of the work commencing and being site cleared. Failure to do so could result in FPNs being issued.

### **Registrations**

These must be submitted within 10 working days of the date the reinstatement was completed on site. **Please note that the reinstatement date can differ from the site clear date.** Please ensure that the permit is work stopped with or without excavation correctly, first time, to reflect the circumstances on site. Whilst Street Manager allows this field to be amended after the works stop is submitted, this can result in an FPN for Incorrect Works Stop.

All types of reinstatement must be registered individually. For example, we would expect to see 1 site for any main trench work and a separate reinstatement site for each individual property connection/property box.

### **Rejected permits – Outright refusal vs. Permit Modification Requests**

Full refusals and Modifications Requests can be reduced, if not mostly avoided, by ensuring early and robust engagement with our Traffic & Network Management Team prior to permit submission.

### **Night Working**

This would need to be discussed on a case-by-case basis with the relevant area Traffic & Network Coordination Manager. Whilst there will be benefits at some locations, this may not be practical in others.

## **4. Physical Deployment and Reinstatements**

### ***Condition of the road surface prior to works***

Any concerns and agreements must be discussed with the relevant area Traffic & Network Inspections Manager so these can be agreed and confirmed in writing.

### ***Potential use of new material/technique***

Staffordshire County Council are happy to discuss and consider these prior to works commencing. Any 'real-life' examples from neighbouring authorities where these have been trialled successfully would greatly aid these considerations. These must be discussed with the relevant area Traffic & Network Inspections Manager so these can be agreed and confirmed in writing.

### ***Interpretations of the SROH***

These must always be primarily addressed to the relevant area Traffic & Network Inspector. If there is a difference of opinion this must then be taken to the relevant area Traffic & Network Inspections Manager. If this is still not resolved, then advice and input can be requested from other Highway Authorities that form part of the WaSP scheme and/or WM JAG and WM HAUC.

### ***Parking bay suspensions***

These queries can be addressed to the relevant area Traffic & Network Coordination Manager.

### ***Parking difficulties***

Any concerns can be addressed to the relevant area Traffic & Network Coordination & Inspections Managers and should, ideally, be identified in the pre-site meetings.

### ***Site Cleanliness***

The expectation is that all works sites are fully cleared of equipment and debris and fully returned to public use upon completion of work. Where sites need to be swept down, a programme of works for the sweeper machine may be appropriate and requested by the relevant Inspections and Coordination Managers.

## A balanced approach to fines

Staffordshire County Council may issue FPNs and S74 overrun charges for the following reasons:

- Road Markings - Depending on the length & type of road marking missing, this could result in a S74 fine, for very small sections we would seek to reach a local resolution of this being rectified within 48 hours of notification before consideration of a S74 overrun charge being enforced.
- Permit boards - If the number itself is incorrect and makes it difficult for the permit number to be identified an FPN may be issued.
- Pedestrian facility widths – Leniency may be applied depending on whether any complaints or observations of pedestrian difficulties are identified on site
- Working times – Leniency may be applied unless there is a firm deadline for work start and stop times which is not observed, this would be location dependant.
- Unimportant administrative errors – These should be identified and corrected before the permit is granted but leniency may be applied to any further modifications made and transactions submitted, depending on the impact of any errors made.

Please note that due to legislative changes being introduced on 1<sup>st</sup> April 2023, a S74 informal overrun warning will need to be issued at the point of notification but could be withdrawn at a later date if rectified promptly and good communication and cooperation is observed.

The warning will always contain the maximum legislative amount of the overrun fine in the text, but this is a starting point and Staffordshire County Council will always encourage mitigation discussions to ensure a proportionate and fair outcome for the disruption caused, including total withdrawal of the fine in some circumstances.

## **5. Contractors**

Staffordshire County Council would like to emphasise our support for the 'right first-time' approach that is stated in the Street Works Toolbox. We would advise and encourage that the contractors are involved in regular programme of works discussions between SCC and the fibre utility company, which will be established by our Traffic & Network Management Team.

Initially Programme of Works meetings will be held weekly, once SCC are confident that the programme is being delivered with minimal disruption and date changes etc, the frequency of these may reduce accordingly.

## 6. Glossary of Terms

**AoNB** – Area of Natural Beauty

**COP** – Code of Practice

**DSIT** – Department for Science, Innovation & Technology

**DfT** – Department for Transport

**ES** – Early Start

**EToN** – Electronic Transfer of Notices: The national electronic system for managing and planning street works. EToN is governed by the Department for Transport. This is in the process of being phased out and will be replaced by Street Manager, a central repository for all road and street works data

**FPN** – Fixed Penalty Notice

**GIS** – Geographic Information System

**HA** – Highway Authority

**LA** – Local Authority

**NRSA** – New Roads and Street Works Act 1991

**PMR** – Permit Modification Request

**SCC** – Staffordshire County Council

**SROH** – The Specification of the Reinstatement of Openings in the Highway

**SSSI** – Site of Specific Scientific Interest

**S74** – Section 74 overrun fine

**S58 restriction** - Protects a street from any planned street works following any major surfacing works

**TMA** – Traffic Management Act 2004

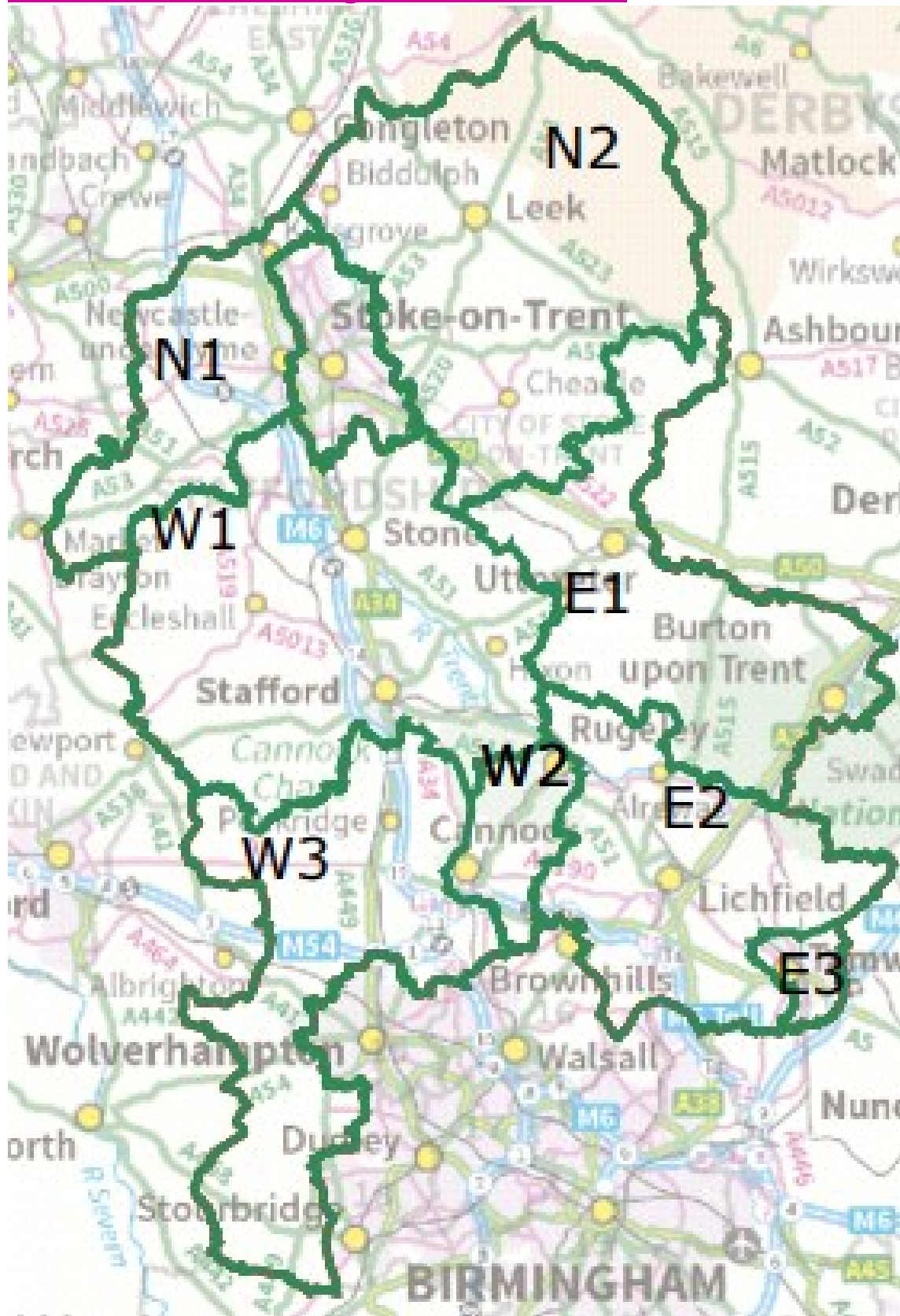
**TTRO** – Temporary Traffic Regulation Order

**T&NM** – Traffic & Network Management Team

**Utility** – Utility companies in the UK that deploy fibre including Openreach, Virgin Media, Gigaclear, CityFibre, TalkTalk and Hyperoptic (this is not an exhaustive list)

## 7. Annex A

### Traffic & Network Management Contact List





**Team email address to be used for ALL correspondence -**  
[trafficandnetwork@staffordshire.gov.uk](mailto:trafficandnetwork@staffordshire.gov.uk)

<b>Newcastle Under Lyme (N1) – 270 USRN prefix</b>			
Andy Oldham (AO)	Traffic & Network Coordination Manager	07890 402330	andy.oldham@staffordshire.gov.uk
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<b>Lichfield and Tamworth (E2 &amp; E3) - 234 and 394 USRN prefix</b>			
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## Works Comment Initials

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AR	Andrew Riach
BD	Bryan Delanchy
CB	Caleb Butler
CF	Caroline Floyd
CR	Chris Rose
CS	Chris Sargent
CM	Christina McKenzie
CC	Claire Collins
CLH	Claire Hasprey
CH	Craig Hardy
EH	Ella Hughes
EE	Emily Evans
EEC	Emma Carson
ELC	Emma Crutchley
GR	Gillian Rogers
GS	Gina Smith
HF	Hayley Fletcher
JM	James Morgan
JC	Jonathan Cooper
JL	Joe Lee
KS	Kat Staunton
KW	Kelly White
KB	Kenny Banks
LB	Laura Buckley
LW	Lauren Wright
LCB	Lee Barnard
MB	Mark Bone
MW	Matt Weaver
MFW	Meloney Foster-Whiteley
NJ	Neil Jones
RS	Robert Smith
SW	Sammie Williams
SP	Sandra Pepper
SM	Sarah Morris
SG	Stuart Green
TM	Tom Morris
TR	Tom Russell
ZS	Zoe Simmonds