EXPLANATORY MEMORANDUM TO

THE TRAFFIC SIGNS (AMENDMENT) REGULATIONS AND GENERAL DIRECTIONS 2011

2011 No. 1040

1. This explanatory memorandum has been prepared by the Department for Transport and is laid before Parliament by Command of Her Majesty.

This memorandum contains information for the Joint Committee on Statutory Instruments.

2. Purpose of the instrument

2.1 This instrument amends the Traffic Signs Regulations and General Directions 2002 (S.I. 2002/3113). The main purpose is to allow the provision of pedestrian crossing facilities (red and green men and push buttons) with portable traffic lights of the type used at road works.

2.2 Minor related amendments are also made to update references to technical standards.

3. Matters of special interest to the Joint Committee on Statutory Instruments

3.1 None

4. Legislative Context

4.1 Current regulations (the Traffic Signs Regulations and General Directions 2002) do not permit the type of portable traffic lights used at road works to be used with pedestrian signals to create a portable pedestrian crossing facility.

4.2 The Government has made a commitment to the European Commission to change this. This instrument meets that commitment by amending the legislation to permit these signals to be used together.

5. Territorial Extent and Application

5.1 This instrument applies to Great Britain.

6. European Convention on Human Rights

As the instrument is subject to negative resolution procedure and does not amend primary legislation, no statement is required.

7. Policy background

- ***What is being done and why***

7.1 The Road Traffic Regulation Act 1984 allows the Secretary of State to make regulations as to the size, colour and type of traffic signs (section 64) and to give directions as to where they may be placed (section 65). This instrument provides for a portable pedestrian crossing facility and prescribes the signs and signals to be used. It also gives directions as to the placing of the signs and signals to make up the crossing.

7.2 Previously, pedestrian signals could be placed only with full-height traffic lights. This requirement is set out in the Traffic Signs Regulations and General Directions 2002, and could only be changed by amendment to those regulations.

7.3 Allowing the use of portable pedestrian crossing facilities by special authorisation was considered. But the Department concluded that, even if this were possible, it would be impractical as we anticipate that the facilities may be used widely and at short notice.

7.4 Direction 56 of the Traffic Signs Regulations and General Directions 2002 requires the control equipment for use at the new portable pedestrian crossing facility to be of a type approved by the Secretary of State. This will mean, in practice, that the equipment will have to comply with technical specifications drawn up by the Highways Agency. As the use of portable traffic lights at portable pedestrian crossings is not currently permitted, there is no existing suitable technical specification against which to measure the control equipment to be used at the crossing. New technical specifications have therefore been drawn up to accompany these new regulations.

7.5 There is little public interest in this. None of the consultation responses received was from the general public.

7.6 The changes are not politically or legally important.

- ***Consolidation***

7.7 A consolidation has not been done in the present amending instrument because the Department for Transport plans to carry out a major revision of traffic signs secondary legislation as a result of the Traffic Signs Policy Review currently under way. That review is expected to finish in 2011. The Department plans to incorporate amendments made following the review into a consolidation of the Traffic Signs Regulations and General Directions 2002.

8. Consultation outcome

8.1 A full 12-week public consultation was carried out between 17 September and 24 December 2009. The draft instrument consulted on contained other proposed amendments that did not relate to portable pedestrian

crossing facilities. After the consultation, the Department decided to separate out the amendments relating to the portable pedestrian crossing facilities. This meant that they could be progressed more quickly.

8.2 Those consulted included: local authority chief executives and traffic managers, Welsh and Scottish local authority chief executives, chief fire officers, the Government offices, the Welsh Assembly Government, the Scottish Executive, representatives of suppliers and manufacturers, and representatives of utility companies.

8.3 137 responses were received. 36 related to the proposals on portable pedestrian crossing facilities. Those 36 were either neutral or in favour of the principle of permitting portable pedestrian crossing facilities, but commented on specific technical points in the amendments. We have addressed these in the final version of the instrument.

8.4 More detail can be found in the Consultation Report, a copy of which has been placed on the Department's website http://www.dft.gov.uk.

9. Guidance

9.1 The only guidance the Department will be issuing will be technical. It will cover the design and operation of portable pedestrian crossing facilities. It will be aimed at those installing and operating the equipment on the street.

9.2 The Department does not plan to issue guidance in relation to the amendments themselves.

10. Impact

10.1 There is no adverse impact on business, charities or voluntary bodies. The amendments are permissive; suppliers can choose whether to develop and market portable pedestrian crossing equipment.

10.2 There is no adverse impact on the public sector. This is for the same reasons as those mentioned at 10.1 above.

10.3 An impact assessment is attached to this memorandum.

11. Regulating small business

11.1 The legislation applies to small business.

11.2 There is no need to minimise the impact on small business because there is no adverse impact. This is for the reasons given at 10.1 above.

11.3 The basis for the final decision that no action needs to be taken to assist small business is that the amendments are permissive: they assist small business by giving it the choice mentioned at 10.1 above.

11.4 Representatives of small businesses with a professional interest in traffic signing were consulted as part of the public consultation on the draft proposals.

12. Monitoring & review

12.1 The Department has no plans for formal monitoring and review of how the new provisions are working. But the Department will be kept informally updated by the industry on how the provisions are working in practice.

12.2 If any issues with the legislation are identified, the Traffic Signs Policy Review mentioned in paragraph 7.7 above will give us the opportunity to make any changes that may be necessary.

13. Contact

Sally Dutton at the Department for Transport tel: 020 7 944 2917 or email: sally.dutton@dft.gsi.gov.uk can answer any queries regarding the instrument.

Title:	Impact Assessment (IA)
Impact Assessment for the Traffic Signs (Amendment) Regulations and General Directions 2010 **Lead department or agency:** Department for Transport **Other departments or agencies:** N/A	**IA No:** DFT00007 **Date:** 12/11/2010 **Stage:** Enactment **Source of intervention:** Domestic **Type of measure:** Secondary legislation **Contact for enquiries:** Sally Dutton, sally.dutton@dft.gsi.gov.uk 0207 944 2917

Summary: Intervention and Options

What is the problem under consideration? Why is government intervention necessary?

The UK regulatory framework currently does not allow portable pedestrian crossing equipment, used in other European countries, to be used here. This has created a barrier to trade. Government intervention is necessary as this area is regulated by the Traffic Signs Regulations and General Directions.

What are the policy objectives and the intended effects?

The policy objective is to remove the current barrier to trade by permitting the use of portable pedestrian crossings. The intended effect is to open up the market for this equipment.

What policy options have been considered? Please justify preferred option (further details in Evidence Base)

i) Do nothing: this option was discounted as the Department has already received an Article 226 letter on this matter from the European Commission, in October 2008 (this is the first stage in infraction proceedings).
ii) Allow portable pedestrian crossing equipment to be used without regulatory change or with special authorisation: this was discounted as it was outside the legal powers granted to the Secretary of State in TSRGD.
iii) Make the changes as part of the wider Traffi c Signs Policy Review: this was discounted as the Review is not likely to result in any regulatory change before 2012. This is too late as infraction proceedings must be dealt with urgently.
iv) Amend the Traffic Signs Regulations and General Directions 2002. This is the only option that allows us to permit the use of portable pedestrian crossings and address any barrier-to-trade issues.

When will the policy be reviewed to establish its impact and the extent to which the policy objectives have been achieved?	It will be reviewed 04/2013
Are there arrangements in place that will allow a systematic collection of monitoring information for future policy review?	No

SELECT SIGNATORY Sign-off For enactment stage Impact Assessments:

I have read the Impact Assessment and I am satisfied that (a) it represents a fair and reasonable view of the expected costs, benefits and impact of the policy, and (b) the benefits justify the costs.

Signed by the responsible Minister: Norman Baker..... Date: 30th March 2011.....

Summary: Analysis and Evidence

Policy Option 1

Description:

Price Base Year 2010	PV Base Year 2010	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: N/A	**High:** N/A	**Best Estimate: N/A**

COSTS (£m)	Total Transition (Constant Price)	Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	N/A		N/A	**N/A**
High	N/A		N/A	**N/A**
Best Estimate	N/A		N/A	**N/A**

Description and scale of key monetised costs by 'main affected groups'

None.

Other key non-monetised costs by 'main affected groups'

It is anticipated that there may be some additional costs to local authorities or utilities if they choose to purchase or hire this equipment. However, as the changes are permissive and do not impose any requirements to purchase or use this equipment, the private costs to these bodies should be outweighed by the private benefits they received. There may be some concerns about road safety, but it is unclear what impact this may have and therefore they cannot be quantified at this time.

BENEFITS (£m)	Total Transition (Constant Price)	Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	N/A		N/A	**N/A**
High	N/A		N/A	**N/A**
Best Estimate	N/A		N/A	**N/A**

Description and scale of key monetised benefits by 'main affected groups'

None.

Other key non-monetised benefits by 'main affected groups'

Local authorities and utility companies/contractors are the main users of this type of equipment. These changes should open up a new market for pedestrian crossing equipment. However, it is not possible at the moment to gauge the extent of this.

It is assumed that if local authorities/utilities choose to purchase or hire this equipment, this is because they derive some private benefit from doing so, which will outweigh the private cost of purchase.

Key assumptions/sensitivities/risks **Discount rate (%)** 0

There may be some road safety concerns with the use of the new equipment, but this will be mitigated by new DfT operational guidance. These concerns will be monitored through the Post-Implementation Review. The level of demand for this equipment cannot be quantified at present. In consultation, only 22 local traffic authorities commented on the proposals. No comments were received from utility companies, and manufacturers' and suppliers' representatives did not indicate strong support for the proposals. Given this, we anticipate demand will be small.

Impact on admin burden (AB) (£m):			Impact on policy cost savings (£m):	In scope
New AB: N/A	**AB savings:** N/A	**Net:** N/A	**Policy cost savings:** N/A	No

Enforcement, Implementation and Wider Impacts

What is the geographic coverage of the policy/option?			Great Britain		
From what date will the policy be implemented?			31/01/2011		
Which organisation(s) will enforce the policy?			Highway and traffic authorities		
What is the annual change in enforcement cost (£m)?			None		
Does enforcement comply with Hampton principles?			Yes		
Does implementation go beyond minimum EU requirements?			N/A		
What is the CO_2 equivalent change in greenhouse gas emissions? (Million tonnes CO_2 equivalent)			**Traded:** None	**Non-traded:** None	
Does the proposal have an impact on competition?			No		
What proportion (%) of Total PV costs/benefits is directly attributable to primary legislation, if applicable?			**Costs:** N/A	**Benefits:** N/A	
Annual cost (£m) per organisation (excl. Transition) (Constant Price)	**Micro** N/A	**< 20** N/A	**Small** N/A	**Medium** N/A	**Large** N/A
Are any of these organisations exempt?	No	No	No	No	No

Specific Impact Tests: Checklist

Set out in the table below where information on any SITs undertaken as part of the analysis of the policy options can be found in the evidence base. For guidance on how to complete each test, double-click on the link for the guidance provided by the relevant department.

Please note this checklist is not intended to list each and every statutory consideration that departments should take into account when deciding which policy option to follow. It is the responsibility of departments to make sure that their duties are complied with.

Does your policy option/proposal have an impact on…?	**Impact**	**Page ref within IA**
Statutory equality duties[1] Statutory Equality Duties Impact Test guidance	No	6,7
Economic impacts		
Competition Competition Assessment Impact Test guidance	No	6
Small firms Small Firms Impact Test guidance	No	6
Environmental impacts		
Greenhouse gas assessment Greenhouse Gas Assessment Impact Test guidance	No	6
Wider environmental issues Wider Environmental Issues Impact Test guidance	No	6
Social impacts		
Health and well-being Health and Well-being Impact Test guidance	No	7
Human rights Human Rights Impact Test guidance	No	7
Justice system Justice Impact Test guidance	No	7
Rural proofing Rural Proofing Impact Test guidance	No	7
Sustainable development Sustainable Development Impact Test guidance	No	6

[1] Race, disability and gender Impact assessments are statutory requirements for relevant policies. Equality statutory requirements will be expanded 2011, once the Equality Bill comes into force. Statutory equality duties part of the Equality Bill apply to GB only. The Toolkit provides advice on statutory equality duties for public authorities with a remit in Northern Ireland.

Evidence Base (for summary sheets) – Notes

Use this space to set out the relevant references, evidence, analysis and detailed narrative from which you have generated your policy options or proposal. Please fill in **References** section.

References

Include the links to relevant legislation and publications, such as public impact assessment of earlier stages (e.g. Consultation, Final, Enactment).

No.	Legislation or publication
1	http://www.dft.gov.uk/consultations/archive/2009/trafficsignsamendmentregs/
2	http://www.legislation.gov.uk/uksi/2002/3113/contents/made
3	http://www.legislation.gov.uk/ukpga/1984/27/contents
4	

+ Add another row

Evidence Base

Ensure that the information in this section provides clear evidence of the information provided in the summary pages of this form (recommended maximum of 30 pages). Complete the **Annual profile of monetised costs and benefits** (transition and recurring) below over the life of the preferred policy (use the spreadsheet attached if the period is longer than 10 years).

The spreadsheet also contains an emission changes table that you will need to fill in if your measure has an impact on greenhouse gas emissions.

Annual profile of monetised costs and benefits* - (£m) constant prices

	Y_0	Y_1	Y_2	Y_3	Y_4	Y_5	Y_6	Y_7	Y_8	Y_9
Transition costs										
Annual recurring cost										
Total annual costs										
Transition benefits										
Annual recurring benefits										
Total annual benefits										

* For non-monetised benefits please see summary pages and main evidence base section



Microsoft Office
Excel Worksheet

Evidence Base (for summary sheets)

Problem under consideration and rationale for intervention

Portable traffic lights are those used at road works and street works to control vehicle traffic. They are slightly smaller than permanent traffic lights, and are usually mounted on tripods or small trolleys, but operate in the same way and have the same meanings. Their size, colour and operating sequence are regulated by the Traffic Signs Regulations and General Directions 2002, as are all traffic signs, signals and road markings in GB (Northern Ireland have their own Traffic Signs Regulations).

Our current regulatory framework creates a barrier to trade by prohibiting the use in the UK of portable pedestrian crossing equipment used in other countries. Under the current Traffic Signs Regulations and General Directions, portable signals can only be used at road works to control vehicles as the combination of vehicle signals (Red/amber/green) and pedestrian signals (red/green figure) is not permitted. The Traffic Signs Regulations and General Directions 2002 must be amended if we are to allow this combination to be used.

In 2005 a UK manufacturer complained to the European Commission (EC) that this created a barrier to trade as this equipment was in use in other member states. Following this, the EC decided that the UK was in breach of Articles 28 to 30 of the EC Treaty. The Department received an Article 226 letter from the EC in October 2008. Article 226 letters are the first stage of infraction proceedings and are issued by the EC in cases where they consider a member state has failed to fulfil its obligations under the Treaty.

The objective of this SI is to remove this barrier-to-trade infraction case by permitting the use of portable pedestrian crossings. This will create a 'level playing field' for all manufacturers.

Background

By virtue of section 64 of the Road Traffic Regulation Act 1984 traffic signs for use in Great Britain (including traffic signals and road markings) must either conform to the standards set mainly in the Traffic Signs Regulations and General Directions 2002 (TSRGD) or be specially authorised by the Secretary of State (or appropriate devolved administration); authorisation would occur, for instance, where a local need is not met by the regulations. As TSRGD is secondary legislation, the necessary changes must be made by further secondary legislation.

Traffic signs are strictly regulated to ensure national consistency of traffic sign design and use, to maximise road user understanding. Clear and consistent traffic signing and signalling plays a key role in achieving effective traffic management, while contributing to increased road safety.

TSRGD sets out requirements for size, colour, type, and operating sequence for traffic lights, including portable ones. They also set out permitted combinations of signal heads – for example, pedestrian signals to be placed with vehicle signals, and so on. The amendments to TSRGD are concerned with allowing the combination of signals, signs and markings needed to make a portable pedestrian crossing.

The controller driving the signals is also required by TSRGD to be of a ‘type approved by the Secretary of State’. This is the responsibility of the Highways Agency, who issue technical specifications covering minimum safety-critical performance requirements that a manufacturer must meet. Any manufacturer, from the UK or EU, must seek type approval to the relevant specification from the Highways Agency before the equipment can be used legally on the highway. This regime covers all control equipment at present, and will include the new portable pedestrian crossing controllers.

The HA are currently drafting new specifications to cover portable pedestrian crossing controllers, and we have been working with them and the EC on this. These include a mutual recognition clause, to cover EU specifications/standards equivalent to UK ones.

As these specifications are 'technical regulations' within the meaning of the EC's Technical Directive, we need to ensure that they meet the principle of Mutual Recognition - that goods can move freely between EU member states. We should not impose national requirements over and above those of other EU states without evidence that this is justified for UK use. To do so could be considered to be a barrier to trade, as in this case. The Government must now intervene to ensure that this barrier to trade is reduced.

Policy Options Considered

Four options were considered:

i) Maintain our current position (do nothing). This was discounted as it risks further infraction proceedings from the Commission, as we would need to provide scientific research or evidence that our position is justified, which we do not have.

ii) Allow portable pedestrian crossings to be used without regulatory change or with special authorisation. This was discounted as legal advice was that this would be beyond the powers given to the Secretary of State in TSRGD.

iii) Make the necessary changes as part of the wider revision of TSRGD that will come out of the Traffic Signs Policy Review. However, this is not due to produce any regulatory change until 2012 at the earliest, which is too long a timeframe as infraction proceedings need to dealt with as quickly as possible.

iv) Amend the Traffic Signs Regulations and General Directions 2002 to permit the use of portable pedestrian crossings.

Option iv) is the only one that allows us to achieve the objective of prescribing the use of portable pedestrian crossings. As such, this is the only option that has been considered further.

Costs and Benefits of chosen option

Benefits

If local authorities/contractors choose to use these facilities, they may provide benefits to pedestrians by providing places to cross at road works or where an existing permanent crossing has had to be taken out of service. It will also be possible to provide a temporary facility at, say, a large sporting event or festival, which may provide benefits to large numbers of pedestrians attending such events. However, it is not possible to quantify these benefits. As explained below, we anticipate the level of demand for such equipment will be small, and therefore the benefits deriving from their availability may also be expected to be small.

It is possible that the introduction of such equipment could benefit the market for pedestrian crossing equipment, opening up new opportunities and increasing competition. However, we do not have sufficient information on this market or of likely demand for the new equipment, to make a judgement on what impact there may be.

In the public consultation, only 22 local traffic authorities commented on this proposal. Of that 22, 16 were in favour. However, this is too small a sample to draw definitive conclusions from, given that there are about 180 local traffic authorities in England, Scotland and Wales. Representatives of utility companies also commented on portable signals generally, but did not express any opinion on the proposals for portable pedestrian crossings.

Representatives of suppliers and manufacturers of portable signals also commented, and although accepting of the principle of providing portable pedestrian crossings, were concerned about possible safety issues in deployment.

Given the above, we anticipate likely demand will be small.

Costs

There would be costs to those local authorities or utility companies who chose to buy or hire this equipment. Given that this amendment does not impose any requirement to purchase, it is assumed that if local authorities were to choose to make use of this equipment, they would have judged that the benefits to them of doing so outweighed any costs they may incur.

It is possible that the introduction of this equipment could lead to a reduction in safety. This equipment has not been permitted until now due to safety concerns. However, we have no data to support this view and therefore do not know of the likelihood or possible magnitude of this cost. This is discussed further in the risks section below.

Risks and Assumptions

There are some concerns about safety of this equipment. Historically, we have not allowed its use as we felt it was unsafe. However, we have no data to support this view, or quantify the level of risk, because they were not permitted and so we could not assess their performance. This is something we will assess at post-implementation review stage.

Traffic authorities are the only bodies, apart from the police, who have the powers under section 65 of RTRA 1984 to 'cause or permit' any sign or traffic signal to be used. This includes portable pedestrian crossings. They have a duty to ensure that any such equipment is fit for purpose and deployed in a safe manner. We will be producing design and operational guidance for local authorities and contractors in parallel with the regulatory changes. This should help manage potential risks associated with the use of portable pedestrian crossings.

Wider Impacts

Enforcement, sanctions and monitoring

There is no formal enforcement, sanctions or monitoring of traffic signs in Great Britain. Both the Highways Agency and local highway authorities are responsible for their roads and for complying with TSRGD. This will remain the case after the amendment regulations come into force.

Competition Assessment

The Road Traffic Regulation Act 1984 requires traffic signs to be of the size, colour and type specified in regulations, mainly TSRGD. These regulations do not preclude any manufacturer from producing compliant traffic signs. Therefore we do not consider that there are any competition issues arising from the proposals.

The changes will open up the market to new products as portable signal controlled pedestrian facilities have not previously been permitted. There is an opportunity for the traffic signal industry to develop and market new equipment, but it has not been possible to quantify how likely this is to be taken up at present.

Small Firms Impact Test

These changes do not introduce any new requirements - they are enabling changes only. Therefore there will be no compulsory costs to small firms.

Representatives of those small businesses with a professional interest in traffic signing were consulted as part of the 12-week public consultation on the draft proposals. They did not raise any concerns about possible impacts on them.

Legal Aid

The proposed amendment regulations will not introduce new criminal sanctions or civil penalties.

Sustainable development

The Department does not consider that the proposed amendment regulations will have an impact on sustainable development principles.

Carbon Assessment

The Department does not consider that these regulations will affect the level of greenhouse gas emissions.

Other Environment

The Department does not consider these regulations will have an adverse environmental impact.

Health Impact Assessment

There are some concerns about the safety of this equipment. However, it has not been possible to quantify this as its use has not been permitted until now. This is one of the areas we will look at as part of the PIR.

Race Equality

There will be no impact on race equality.

Disability Equality

Under the Disability Discrimination Act 1995, it is unlawful for a public authority to discriminate against a disabled person in carrying out its functions. We do not consider that these regulations will discriminate against disabled people as the purpose of traffic signs is to provide the requisite information in order for them (and others) safely to navigate their journey. There are no disability related issues in these proposals.

Gender Equality

There will be no impact on gender equality.

Human Rights

There will be no impact on human rights.

Rural proofing

The proposed amendment regulations should not impact on rural communities unfairly.

Equality Groups

I confirm that these proposals have been screened for their likely impact (positive or adverse) on the equality groups and where required, an Equality Impact Assessment has been completed.

Summary and Preferred Option

It has not been possible to quantify the costs or benefits associated with these changes due to lack of data. However, both costs and benefits are likely to be small. We have put in place measures to help mitigate the safety concerns, and believe that overall, the benefits may outweigh the costs.

Taking all this into account, option iv) in the summary table is the preferred option.

Annexes

Annex 1 should be used to set out the Post Implementation Review Plan as detailed below. Further annexes may be added where the Specific Impact Tests yield information relevant to an overall understanding of policy options.

Annex 1: Post Implementation Review (PIR) Plan

A PIR should be undertaken, usually three to five years after implementation of the policy, but exceptionally a longer period may be more appropriate. A PIR should examine the extent to which the implemented regulations have achieved their objectives, assess their costs and benefits and identify whether they are having any unintended consequences. Please set out the PIR Plan as detailed below. If there is no plan to do a PIR please provide reasons below.

Basis of the review: [The basis of the review could be statutory (forming part of the legislation), it could be to review existing policy or there could be a political commitment to review]; Review policy and legislative change to permit use of portable pedestrian facilities.
Review objective: [Is it intended as a proportionate check that regulation is operating as expected to tackle the problem of concern?; or as a wider exploration of the policy approach taken?; or as a link from policy objective to outcome?] To assess levels of use of portable pedestrian facilities and identify any problems.
Review approach and rationale: [e.g. describe here the review approach (in-depth evaluation, scope review of monitoring data, scan of stakeholder views, etc.) and the rationale that made choosing such an approach] We plan to carry out research to look at issues including: 1) extent of use of portable pedestrian facilities 2) views of stakeholders on changes 3) research into technical performance of equipment, 4) assessment of any impact on road user safety.
Baseline: [The current (baseline) position against which the change introduced by the legislation can be measured] Currently these facilities are not permitted, so the baseline is 0.
Success criteria: [Criteria showing achievement of the policy objectives as set out in the final impact assessment; criteria for modifying or replacing the policy if it does not achieve its objectives] In the short term, success is limited to whether the EC accepts that these changes remove the perceived barrier to trade, and closes the infraction case. In the longer term, if any issues are identified from the research that indicate the legislative change is not succeeding, or is causing problems, we will have an opportunity to address these as part of the outcome of the Traffic Signs Policy Review.
Monitoring information arrangements: [Provide further details of the planned/existing arrangements in place that will allow a systematic collection systematic collection of monitoring information for future policy review] We will use our existing links with local authorities, utility companies and other stakeholders to obtain information on the use and performance of these facilities.
Reasons for not planning a PIR: [If there is no plan to do a PIR please provide reasons here] N/A

Add annexes here.