



Hampshire
County Council

Hampshire County Council
Lane Rental Scheme

Consultation Summary

November 2025

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Consultation Approach

The Council undertook consultation on a lane rental scheme, in accordance with Government guidance¹, issued by the Department for Transport, which states *an authority needs to consult locally on proposals for schemes before finalising its bid ... and ...any local highway authority making an application to the Secretary of State to run a lane rental scheme will need to have carried out a full consultation on the draft scheme. Alongside the draft scheme, the consultation package should also include:*

- a list of the streets that will be included in the scheme;
- reasons for its designation as traffic sensitive street;
- the authority's cost-benefit analysis;
- the authority's proposed charging regime; and
- the authority's detailed evaluation plan

The consultation ran for a period of six weeks between Monday 21st July to Friday 29th August (inclusive) and included the following documents (refer to table below) for reference.

Hampshire Lane Rental Scheme (Consultation)	This document is the proposed lane rental scheme.
Hampshire Lane Rental Scheme – Schedule	This document is a table containing the streets to be designated as lane rental, including the timings of the designation and other relevant information. Maps showing the network spatially will also be published and made available online for reference.
Hampshire Lane Rental Scheme Consultation Overview	This document provides supporting information related to the proposed lane rental scheme and schedule.
Hampshire Lane Rental Scheme – Cost-Benefit Analysis	This document provides the economic assessment of the scheme, considering the costed benefit to society to introduce and operate a lane rental scheme.
Hampshire Lane Rental Scheme – Evaluation Plan	This document outlines a proposed approach and methodology to evaluate the scheme, once operational, to demonstrate the benefits are being realised.

These documents were emailed to all consultees and published to a Council webpage. An interactive map containing the proposed lane rental network and timings was also made available included the Schedule information at street level. Responses were received via email to a specific address created by the Council (lane.rental@hants.gov.uk).

¹ <https://www.gov.uk/government/publications/street-works-lane-rental/lane-rental-schemes-guidance-for-english-highway-authorities>

Consultation Summary

Responses received

The Council received responses from 24 individual Consultees (refer to table below) including members of the Public.

Hampshire County Council (Internal Teams)	Hampshire 2050 Hampshire County Council - Engineering Services & Highways Delivery Hampshire County Council - Transport Planning
Local Councils	Gosport Borough Council Rushmoor Borough Council Winchester Safety Advisory Group
Members of the Public	8 anonymised responders
Statutory Undertakers	CityFibre Openreach Portsmouth Water Scottish and Southern Electricity Networks SEJUG South East Water Southern Water
Transport Operators	Bluestar First Bus Stagecoach

As expected by the Council, the lane rental consultation reveals polarised positions on the introduction of a scheme from key stakeholder groups. Lane rental is welcomed by transport operators and some members of the public, cautiously supported by Hampshire councils, but strongly opposed by utility companies.

- Transport operators support lane rental strongest as they can see direct benefits to their customers.
- Statutory undertakers are overwhelmingly opposed, citing cost, safety, and governance burdens.
- Public opinion is split, with both strong support and strong criticism.
- Councils within Hampshire are supportive but cautious, highlighting amenity and displacement risks.
- Hampshire Council internal teams are divided in their position, whilst supportive of policy they are sceptical on the scheme operation.

Council response to the consultation

The Council therefore need to consider the responses to determine whether (a) the introduction of a lane rental scheme is viable; and (b) the proposed lane rental scheme, including the Schedule and supporting documents requires any change, to make it viable.

Many of the concerns raised by consultees are predicated on opinion and their viewpoint, with no quantifiable evidence, analysis or counter-factual argument. The Council can respond to these concerns with their own viewpoint, and in many instances can reference their own analysis, evidence or external sources, such as the findings from existing lane rental schemes.

Many of the views expressed relate to the perceived benefit or dis-benefit of the scheme to the organisation and their customers. These are often conflicting. For example, utility companies want to limit the streets where lane rental is applied and the timings, such as weekends, however transport operators would like to see more streets included, to cover their bus routes, and encourage lane rental at peak times and weekends.

Overall, this demonstrates the need for the Council to consider balance in their approach to introduce a lane rental scheme. As a general principle the Council will work with Promoters so that they can coordinate their works to lessen for any impact, avoiding any further disbenefits to society, such as from noise, and therefore avoid or lessen a charge. Due to the varied and sometimes complex nature of works, it is not possible to build specific scope within the lane rental scheme to cover all circumstances where a discount or waiver would apply, such as working at night or as a result of the technical composition of the street materials. Instead, published operational guidance will provide further definition on the application of the scheme and ways of working under this principle.

The table below provides a high-level overview of the legitimate challenges received from the consultation and related action. This has been delineated by key sections of the Scheme and supporting documents.

Hampshire Lane Rental Scheme (Consultation)	Comments related directly to the scope of the Scheme will be clarified and as necessary developed within the operational guidance. No changes to the lane rental scheme.
Hampshire Lane Rental Scheme – Schedule	In consideration to the consultation responses, the Council undertook a further review and applied changes to the sections of streets, such as side roads, lane rental timings, such as weekends, and cross-border streets. As a result the overall lane rental network reduced to 446 streets (from 524), 659 kilometres in length (from 764 kilometres), totalling 7.5% of the total network length (from 8.7%).
Hampshire Lane Rental Scheme Consultation Overview	Challenges received can be responded to with no further action.
Hampshire Lane Rental Scheme – Cost-Benefit Analysis	Challenges received can be responded to with no further action.
Hampshire Lane Rental Scheme – Evaluation Plan	No challenges and further action.

Summary of Responses

Members of the Public

Some members of the public welcomed the scheme, surprised it wasn't already in place, and saw it as a necessary tool to reduce disruption. Overall Public opinion is split — some strongly supportive, others highly sceptical, with recurring themes of cost pass-through, safety, and transparency.

Key themes

Cost concerns: Strong fear that charges will be passed on to consumers through higher utility bills or council taxes, effectively becoming a “stealth tax.”

Safety and quality risks: Worries that contractors will cut corners, compress schedules unsafely, or avoid proper curing/testing to dodge charges.

Administrative burden: Anticipated disputes over waivers, extensions, and charge accuracy.

Behavioural distortion: Risk of contractors working the system, for example splitting works or using premature closures.

Alternative suggestions: Preference for fines tied to overruns, or contract-based key performance indicators, such as profit at risk or bonus for early completion.

Trust and communication: Calls for better public-facing explanations of delays rather than punitive charging.

Transport Operators (Bus Companies)

Transport operators are strongly supportive overall as they view lane rental as a way to reduce disruption that disproportionately affects bus services. The operators would like to see a wider scope for lane rental and revenue reinvestment into public transport reliability.

Key themes

- **Bus routes:** Inclusion of all bus corridors, not just high-frequency routes, in scheme scope.
- **Charging periods:** Recognition of weekend and school-peak congestion in charging periods.
- **Bus operator costs:** Use of scheme revenue to offset bus operator costs, such as extra vehicles, diversions, or reliability measures.
- **Closures impact:** Concerns about short-notice closures and excessive advertised closure periods.

Statutory Undertakers (Utilities & Telecoms)

Statutory undertakers are united in opposition of lane rental framing it as a stealth tax that adds cost and complexity without reducing disruption.

Key themes

- **Cost pass-through:** Charges will inevitably be passed to customers, raising bills.
- **Safety risks and environmental impact:** Pressure to compress works could compromise safety, environmental compliance, and engineering standards.

- **Administrative burden:** Significant overhead in managing waivers, disputes, and governance.
- **Scope concerns:** Inclusion of non-traffic-sensitive streets questioned; traffic-sensitive designations seen as incomplete or outdated.
- **Charging structure:** Daily maximum charge (£2,500) viewed as blunt and revenue-driven; calls for hourly rates or longer emergency waivers.
- **Governance:** Preference for regional governance boards and stronger alignment with DfT guidance.

Hampshire District Councils

Hampshire Councils were supportive of lane rental in principle, but cautious in some areas of operation. Overall: District councils back the scheme's aims but stress the need for environmental safeguards and fair cost-sharing.

Key themes

- **Congestion:** Recognition of congestion impacts and support for stronger controls.
- **Environmental impacts:** Concerns about displacement to night/weekend works, creating noise and amenity issues.
- **Administration cost:** Requests for reimbursement of additional costs borne by district councils, such as environmental health enforcement.
- **Balanced approach:** Calls for hybrid approaches balancing traffic management with resident wellbeing.

Hampshire County Council (Internal Teams)

Hampshire County Council internal teams responses show a mixed position, depending on their internal role. There is support for the policy rationale, but operational arms (works promoter) raise practical concerns about implementation and duplication of existing powers.

Key themes

- **Support for policy:** Lane rental is aligned with Local Transport Plan 4 and wider policy goals, such as active travel and decarbonisation.
- **Use of revenue:** Recommend revenue use for walking/cycling improvements and regional coordination.
- **Operational impact:** Delivery teams: More sceptical, questioning duplication with existing permit scheme, safety risks, and consumer cost pass-through.

Response to Consultation Comments

The table below provides a distilled view of the key themes running through the consultation feedback on Hampshire's proposed Lane Rental Scheme. These themes have been into broad categories showing concerns and suggestions that converge across all the stakeholders. A Council response has been provided for each view.

Lane Rental Charges

Consultee Comment	Council Response
<p>Maximum daily charge</p> <p>Strong pushback on starting at the £2,500/day cap; many suggest lower caps, tiered “high/medium/low” bands, or hourly rates for short works.</p>	<p>As outlined in the supporting Consultation Overview and Cost-Benefit-Analysis the charge levels are fully justified compared to the costed impact of work to society on the lane rental network at peak times.</p> <p>On the streets selected for lane rental the work impact cost far exceeds the maximum charge of £2,500, therefore any charge bands would be disproportionate to the costed impact.</p> <p>No change to the lane rental scheme.</p>
<p>Proportionality</p> <p>Calls for charges to reflect actual disruption, with waivers or discounts for low-impact, non-excavation, or short-duration works.</p>	<p>The charging regime does reflect disruption on the proposed network at peak times. The Scheme offers inter-peak and off-peak periods in which shorter duration works can be undertaken.</p> <p>For longer duration works the Scheme offers discounts, up to 100% of the charge, with clearly defined criteria in addition to Council discretion.</p> <p>No change to lane rental scheme.</p>
<p>Major projects</p> <p>Requests for caps or exemptions for strategic infrastructure (e.g., fibre rollout, EV charging, government-backed schemes).</p>	<p>The Scheme does include the capability to cap, or limit, the total lane rental charge through a discount.</p> <p>The Council has considered setting rules to apply a limit, however these are deemed impractical to apply with a risk they would serve as a disincentive within the Scheme. The Council will however reconsider this after the Scheme has been operated for a period of time.</p> <p>No change to the lane rental scheme.</p>

Discounts, Waivers & Incentives

Consultee Comment	Council Response
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<p>Collaboration</p> <p>Desire for full waivers (not just 25% discounts) for specific works to encourage coordination.</p>	<p>All discounts can be applied to a maximum of 100%, i.e. no charge. It would be impractical to provide a list of specific works that would receive a discount, however Promoters are encouraged to contact the Council at the earliest opportunity to discuss their works and also any potential discounts, ideally to reduce the overall impact of the work.</p> <p>No change to the lane rental scheme.</p> <p>Operational guidance will contain more specific detail on this subject.</p>
<p>Innovation</p> <p>Clearer criteria and potentially higher discounts for innovative methods that reduce disruption.</p>	<p>The Council recognise that the term innovation could be considered as a new way of working or methodology. However, the Scheme is clear that this discount applies when a Promoter <i>has reduced the detrimental impact of their work, compared to a traditional works methodology</i>. Where a Promoter can quantify a change in approach which lessens the impact of the work a discount will be considered and applied.</p> <p>No change to the lane rental scheme.</p> <p>Operational guidance will contain more specific detail on this subject.</p>
<p>Emergency works</p> <p>Extend the waiver from “2 days” to a true 48-hour clock; avoid penalising unavoidable delays (e.g., curing times, regulatory testing).</p>	<p>The Council considered a 2-day initial waiver for Immediate works and more efficient and practical application than 48-hours. The Council also recognise that this provision is applied to all Immediate works and not just genuine emergency works as suggested in the guidance.</p> <p>In instances where there is any genuine unavoidable or unforeseen circumstance that impacts the duration of the work a Promoter can contact the Council to request a discount at the discretion of the Council.</p> <p>No change to the lane rental scheme.</p>

Timing & Scheduling

Consultee Comment

Council Response

<p>Traffic-sensitive periods</p> <p>Criticism of blanket “all-day” charging; calls for alignment with actual peak times and flexibility for off-peak windows.</p>	<p>The times selected are based on traffic flow profiles collected from various traffic counts points across Hampshire.</p> <p>The lane rental and traffic sensitive designation times were reconsidered based on comments made with consideration to working out-of-hours and at weekends. However, this does not detract from works inflating congestion at peak times on these sections of the network.</p>
<p>Weekend/bank holiday charging</p> <p>Many oppose weekend/bank holiday charging , citing safety, fatigue, and environmental noise impacts; request justification based on traffic data.</p>	<p>As outlined in the Consultation Overview, the Council has undertaken extensive analysis of the network across Hampshire to identify traffic flows, levels of congestion and related timings. Results of this analysis have been shared with interested parties for reference.</p> <p>The Council recognise that there are several factors that influence ways of working across different Promoters, which may include external influences such as Environmental Health and road composition. The Council does expect Promoters to undertake their work with due consideration to health and safety and environmental impact, both for their workers and the road user.</p> <p>As is the practice today, a Promoter can discuss any challenges they face to undertake work with the Council, to consider and agree effective mitigation.</p> <p>As also mentioned above, the Council is reviewed the traffic-sensitive network and lane rental charging periods.</p>
<p>Night work</p> <p>Concerns about noise, safety, and quality if works are pushed out of daytime hours.</p>	<p>Analysis shows that 19% (17% of duration) of works on the proposed lane rental network (2021 – 2023) were undertaken out-of-hours. This demonstrates existing arrangements can be used to ensure work is undertaken at less disruptive times without introducing other disbenefits. Need to consider the impact to residents vs road users.</p>

Current processes for works being undertaken out-of-hours, such as letter drops to residents in advance of work and limits to work methodology, i.e. noise, at specific times, will continue.

For any work on a lane rental street, should a Promoters find a situation where there is an external influence, such as a direction from Environmental Health, that limits their capability to avoid a charge then the Council will consider a waiver or discount.

Network Design & Traffic Sensitivity

Traffic-sensitivity Review

Strong feeling that the Traffic Sensitive Street (TSS) review should have been completed before the lane rental consultation.

The DfT guidance states *before consulting and before any submission to the DfT for approval, an authority must undertake a review of their traffic-sensitive street designations for the streets they propose to include in a lane rental scheme*. The term review is not defined in this guidance or legislation.

As part of the initial lane rental feasibility, the Council undertook a thorough review of the traffic-sensitivity designation for the proposed lane rental schemes. This ensured all the proposed streets had a suitable criterion, as per the regulations, and the timings related to observed traffic flow profiles.

For completeness, the Council served notice on the traffic-sensitivity designation changes on the streets proposed for lane rental in parallel with the lane rental scheme consultation.

The Council recognise that any streets that do not have a traffic-sensitivity designation cannot have a lane rental designation, however the risk is considered low due to the review undertaken prior to consultation.

The Council has reviewed traffic-sensitivity designations and lane rental charging periods.

<p>Accuracy</p> <p>Objections to inclusion of side roads, pedestrian precincts, or low-impact stretches; calls for adding missing key bus corridors.</p>	<p>The Council is limited by regulations, guidance (caps on total lane rental length) and traffic-data analysis to determine how best to apply the lane rental designations.</p> <p>The Council will be considering specific streets and sections of streets mentioned in the consultation comments and make any edits, as allowed, accordingly.</p>
<p>Boundary coordination</p> <p>Need for consistency with neighbouring authorities to avoid conflicting designations and timings.</p>	<p>The Council recognise the need to consider cross-boundary traffic movement and collaboration and consistency with neighbouring authorities, hence introducing a scheme adopted within the region.</p> <p>Changes have been applied to the timing for bordering streets following a review with Southampton City Council and other neighbours that operate lane rental schemes.</p>

Cost-Benefit Analysis & Transparency

Consultee Comment	Council Response
<p>Data quality</p> <p>Criticism of reliance on outdated cost figures and incomplete or inaccurate source data.</p>	<p>The cost-benefit-analysis (CBA) has been prepared using the latest Transport Appraisal Guidance. This requires discounting to convert future costs and benefits into consistent values, allowing for a fair comparison of options that have impacts over different time periods. The Guidance has very recently been updated changing the base year from 2010 to 2023, prior to the development of this CBA.</p> <p>The cost-benefit-analysis clearly states the period of data sources, which includes the most recent data where available.</p>

	<p>For existing lane rental scheme evaluations, as a source reference, the Council is limited to the content, granularity and timeframe for published reports. These evaluations do not include any data or option for further analysis, so the published results are used as a reference. Any observed lane rental scheme changes are considered appropriate to build assumptions.</p>
<p>Running costs</p> <p>Requests for a breakdown of the £987k/year operating cost and clarity on surplus revenue use.</p>	<p>The estimated costs are predominantly for additional employees (c.12) including overheads and other costs, for the administration of the scheme including coordination, onsite compliance inspections, the reconciliation and payment of lane rental charges and governance of surplus revenues.</p> <p>Additionally, the Council expects additional costs related to the annual lane rental scheme evaluation and ongoing analysis of the viability of the Scheme and Schedule.</p>
<p>Purpose</p> <p>Reassurance sought that the scheme is about congestion reduction, not revenue generation.</p>	<p>As outlined within the Consultation Overview, the lane rental scheme is not considered a revenue generating scheme.</p> <p>The Council has to consider the introduction of a lane rental scheme as a financial risk to the authority. Promoters can change their ways of working to avoid charges or receive a discounted charge, in addition to charges applied to the Councils own work contractors. Ultimately, the Council may operate a lane rental scheme at a loss, not a profit (surplus).</p> <p>Any profits received are to be used for purposes related to the benefits of the Scheme, so any revenues generated will ultimately lead to increased benefit to the road users and wider society.</p>

Environmental & Safety Impacts

Consultee Comment

Council Response

<p>Noise</p> <p>Risk of increased night-time works disturbing residents; calls for noise impact assessments and Environmental Health input.</p>	<p>The Council recognise there is a need to balance the impact of works to the road user and local residents.</p> <p>As previously mentioned, the current working processes to consider environmental health will continue and the Council can apply, waiver or discount lane rental charges to achieve the best outcome.</p>
<p>Fatigue & safety</p> <p>Concerns that compressed schedules or out-of-hours work could increase accident risk and reduce quality.</p>	<p>The Council expect Promoters to continue their responsibility for health and safety for their workers and the road user, whilst undertaking their work to required standards.</p> <p>In any instance a Promoter can request due consideration to working practices and environment, in relation to lane rental charges, should a conflict with commercial decisions impact their capability to work safely or to inadequate standards.</p> <p>Whilst this potential disbenefit of a lane rental scheme is recognised by the Council, there is no evidence from the evaluation of lane rental scheme in operation that this disbenefit is being realised.</p>
<p>Environmental constraints</p> <p>Need for waivers where environmental rules prevent out-of-hours work.</p>	<p>The Council agree with this sentiment, and as previously mentioned the principle to balance the impact to local residents and the road user will always be paramount.</p>

Administration & Governance

Consultee Comment	Council Response
<p>Bureaucracy</p> <p>Fear of added administration burden for both Promoters and the Council; with a preference for integrating lane rental into existing permit processes.</p>	<p>The existing permit scheme provides a foundation for a lane rental scheme and increased opportunity to reduce the impact of work which is clearly demonstrated by schemes already in operation in Kent, TfL and Surrey.</p>

	<p>A permit scheme applies similar principles to a lane rental scheme, however it does not contain the financial incentive, which clearly makes a difference in Promoter working behaviour.</p> <p>The administration of the Scheme will be aligned to the permit scheme as much as possible to ensure efficiency for both the Promoters and the Council.</p>
<p>Automatic application</p> <p>Discounts/waivers should be applied automatically, not via separate requests.</p>	<p>The waiver for Immediate works will be applied automatically by the Council.</p> <p>Due to the nature of discounts and the direct relationship to effective coordination, a Promoter will need to request a discount, with justification, for the Council to review and apply.</p> <p>Once the Scheme is operational, the Council will consider if waivers and discounts can be applied more efficiently.</p> <p>No change to the lane rental scheme.</p>
<p>Governance boards</p> <p>Support for regional boards to reduce duplication and resource strain.</p>	<p>The Council fully support the need for the most efficient use of resource, including for Promoters.</p> <p>Viable options for lane rental governance will be discussed with all representatives prior to the introduction of the Scheme.</p>

Public Perception & Communication

Consultee Comment	Council Response
<p>Cost pass-through</p> <p>Widespread belief that charges will be passed to consumers, effectively a “stealth tax”.</p>	<p>The Council recognise that some Promoters can pass on their costs to customers, which may include lane rental charges, amongst other fees and charges.</p> <p>The Council cannot comment on whether these, or any other costs, passed onto customers are fair and reasonable. However, the purpose of the cost-benefit-analysis is to determine whether the overall economic benefit of the Scheme to society is justified.</p>

	<p>This analysis determines that any increased cost to society as a result of a lane rental scheme will have a benefit, higher than the cost, and is therefore economically sound.</p>
<p>Behavioural risks</p> <p>Fear that the scheme will incentivise rushing, cutting corners, or avoiding certain works entirely.</p>	<p>The Council recognise that there are potential disbenefits as a result of Promoter behaviour changes under a lane rental scheme, however the viability of the Scheme should not be diminished as a result of these.</p> <p>The Council has to assume that Promoters will still undertake their statutory duties in compliance with legislation, including specifications, safety codes, and codes of practice, with due diligence.</p> <p>The Council will however monitor potential disbenefits as a result of the Scheme, as best they can, taking any action as required and available to them.</p>
<p>Transparency</p> <p>Calls for clear public communication related to works, such as reasons for delay, and the Scheme operation and governance, i.e. how revenue is spent.</p>	<p>The Council recognises the need and statutory duty for effective communication in relation to works and the operation of the Scheme.</p> <p>One of the expected benefits of a lane rental scheme is better coordination, which should lead to improved timing and accuracy of communications.</p> <p>As outlined in the Scheme and Evaluation Plan, the Council is committed to undertake and publish a periodic evaluation, which will contain the surplus revenues and <i>how this is spent</i>.</p>

Consultation Responses

The sections below contains the responses received from consultation, per organisation or individual responder, together with a document reference (where provided). For formatting purposes responses have been broken down into relevant paragraphs.

Bluestar (Transport Operator)

Hampshire Council Lane Rental Scheme Statutory Consultation

The represents the response of Go South Coast Ltd. trading as Bluestar, to the current statutory consultation regarding the introduction of a lane rental scheme pursuant to its powers under the New Roads and Streetworks Act 1991 (as amended) (“NRSWA”) and in support of the separate Network Management Duty binding on the Council under the Traffic Management Act 2004 (“TMA”).

Since February 2023, Bluestar operates, in effect, the entire commercial bus network within the City of Southampton, as well as routes that extend well beyond its boundaries to serve the vast majority of the City’s travel-to-work area within Hampshire. These extend to Winchester, across the Borough of Eastleigh, to Romsey and across the entire New Forest, where we are also the principal bus operator. This is an extensive and intense operation, run from a large operating centre at Portswood within the City of Southampton, and two other depots at Totton and Eastleigh in Hampshire. Modest amounts of mileage are supported by depots at Lymington and Salisbury, within the wider Go South Coast business. Years of vigorous investment in vehicles and service improvements – which are continuing – has seen bus patronage on many of our services grow in ways that defy wider trends. This is generally the case where we offer dense frequencies on the main corridors, early morning and late-night operation, and a comprehensive Sunday network and timetable.

We should note our continued appreciation for the strong support given by the County to bus operations. The recent Transforming City Fund-funded programme has led to substantial further improvements to bus stops, interchange and bus priority, focused within the County on the Waterside area and the corridor between Hithe, Totton and Southampton city centre, supplementing pre-existing measures and investments – for example in high quality bus stop flags and information displays.

All this offers in many regards, a strong basis on which to further develop and reinforce the bus service offer. This will be crucial to meet the needs of a growing population. Indeed it is important to stress that growth in housing and employment beyond the City’s boundaries is already committed at significant scale in neighbouring authorities, and that national policy is clear that this needs to accelerate to meet pressing and acute development needs. National policy expects immediate efforts to be taken to achieve these ends. New Local Plans in New

Forest District, Test Valley and Eastleigh are in preparation that envisage levels of development that are probably unprecedented in living memory. This will place further significant demands on the County's finite highways infrastructure capacity. The development process itself will present particular challenges to the management of highway works, as utility connection, reinforcement and s278 works are undertaken, all simultaneous with the typical pace of utility maintenance and renewals. Management of increased works activity on the highway therefore well justifies a more rigorous approach, that very clearly aligns incentives on all work undertakers to properly plan, coordinate and sequence highway works to minimise the amount and duration of disruption to traffic movement.

Need for the Scheme

As you will recognise, we have had a longstanding close interest in the way in which the Council discharges the "Network Management Duty" binding on it under the New Roads and Street Works Act 1991 ("NRSWA") and the Traffic Management Act 2004 ("TMA"). The effective discharge of the Duty by highway authorities to generally facilitate the expeditious movement of traffic within their areas has a direct bearing on our ability to provide attractive and reliable bus services.

In fact, because of the nature of scheduled bus operations that pass through areas affected by congestion and delay repeatedly - and in many cases frequently - often with limited or no ability to effectively reassign route. As a result, the impacts of disruption affect us more than any other stakeholder group of highways users.

This being the case, we urge the Council to make the fullest and most appropriate use of the powers at their disposal, as the law requires, recognising that different tools may be appropriate in different situations.

We recognise that works on the highway are unavoidable. Over the last 10 years specific circumstances have combined to lead to noticeably increased levels of disruption, delay and congestion increasing across the highway network. These include: [listed separately]

Substantial erosion of network resilience arising from traffic growth outpacing the limited capacity available in what in most parts of the county, is a network with little or no capacity headroom. This includes the local network, but importantly, serious deficiencies in the resilience of the national Strategic Roads Network ("SRN") operated by National Highways, and in particular the M27 and M271 around Southampton where even relatively modest unexpected disruption of longer-distance traffic has a disproportionate impact on local roads as traffic reassigns.

Increased frequency of works directly related to the delivery of high levels of committed development, both by utilities and by developers under s278 of the Highways Act 1980.

The duration of highways works extending owing to significant ongoing shortages of labour, and in some cases, materials and equipment. While issues with supply chain have eased in the last 12 months, this is less true of civil engineering establishment. The shortage of qualified high-voltage jointers, in particular, is creating especially serious difficulties in progressing electrical network works in a timely manner. We note that utilities now book planned works to include very substantial buffers, to allow them to direct and redirect scarce operative resource between jobs more flexibly. The result is that we increasingly see work-sites unattended for extended periods of time. The current system in many ways incentivises this behaviour, as there are only consequences for over-runs.

The increasing range and complexity of utility assets under the public highway. We are aware that works affecting fibre-optic cables are especially costly and sensitive. There has also apparently been an increase in broadband related works. It is notable that Southampton is one of relatively few cities nationally with a district heating network, around the City Centre, which there are aspirations to develop further.

Major investments are also being made in infrastructure to transform the highway network to make it more resilient and to make streets easier and safer to walk and cycle on.

Furthermore, Hampshire generally can expect to see a substantial increase in development activity. Housing needs are acute, and the County is economically relatively vibrant. However, the process of achieving this demands more works of all kinds in the public highway, over and above the usual process of repair, renewal and modernisation of Promoters' assets. As the City's population continues to grow, pressure on highways capacity is also rising and network resilience is already very challenged.

It is also clear that many highways and utilities assets are separately reaching the end of their economic lives. We have seen ongoing severe disruption on many key arterial routes in Southampton owing to the need to replace and reinforce 19th and early 20th century infrastructure, over the last decade. More recent structures on the highway, including bridges, are also reaching the point where significant maintenance and renewal works are needed. This has been most recently evidenced on the Cobden Bridge in Southampton, the complete closure of which in 2024 was extensively disruptive. By their nature the disruption arising from these is often severe and of very extended duration. While the Scheme will not be applicable to all these works, it does make it that much more essential that all appropriate actions are taken to minimise the length and severity of the duration of works by other Promoters.

All the indications are that these causative factors we outline above are unlikely to diminish.

Furthermore, looking forward, the need to substantially reinforce local and high voltage power distribution networks, in order to support a wider national transition to net-zero energy, could well result in a very much greater level of activity from Distribution Network Operators and iDNOs.

The resulting works inevitably cause disruption to the highway network, but the delays and disruption to bus passengers are greater than almost any other group faces. In recent years, as you know, we have had multiple and serious cases of delay and disruption reaching unacceptable levels.

The direct costs faced by bus operators as a result of disruption caused by highways works are material and substantial. There are numerous occasions where we have had to increase vehicle resource in the network to address disruption arising from planned roadworks, over and above the wider cost inflation that is already experienced owing to more general reductions in bus productivity across the City and beyond in Hampshire. Further to this, slower and more unreliable bus services generally suffer from falling patronage and revenue. This has a clear direct commercial impact, quite apart from the damage it causes to the wider policy ambition to secure a much higher use of public transport to meet climate, environmental and socio-economic policy goals.

Given the situation in Southampton, we therefore unequivocally welcome the decision to exercise the powers available to the Council under s.74/74A of the legislation. We consider that there is ample justification to do so, and that this could be expected to materially incentivise the utilities and development sector seeking to minimise the number and duration of road works.

Scheme Principles

The scheme is intended to allow the City Council as Local Highway Authority to charge organisations undertaking work (Promoters) for the time they occupy the busiest streets during peak hours. The objective of the scheme is to minimise traffic disruption and reduce congestion by incentivising work to be done outside of busy times or completed more quickly. Thus, the applicable statute requires that the scope and design of the scheme must be focused on the most sensitive parts of the network only; and to allow Promoters real opportunities to reduce or avoid exposure to charges by carrying out works in less disruptive ways.

The decision to pursue these powers, in essence, reflects a recognition on the part of the Council that [listed separately]

The cost of disruption from activities on the highway network on its users must be recognised.

Inconvenience to all people using a street must be minimised, but especially for people with particular accessibility requirements, and also other vulnerable road users such as people walking or cycling.

As we set out above, bus operators are disproportionately exposed to direct costs and reduced revenues from the effects of roadworks, especially at busy times.

We consider it well evident that our services can be significantly affected for longer periods of time than other highway users. Not only that, but many roads on which buses operate have especially limited resilience such that certain kinds of traffic management, such as multi-arm shuttle working at key junctions, cause extended delays to buses throughout the operating day.

We also share the Council's expectation that the scheme will directly influence the behaviour of works Promoters such that there will be: Organisational, process and wider institutional and officer/operative site behavioural changes that minimise the duration of occupation of the highway at the busiest locations at Traffic-Sensitive times. Reductions in the number and duration of works taking place during Traffic-Sensitive times; and Contributions towards maintaining or improving journey time reliability on the highway network.

With regard to this last point, given the clear and direct relationship between bus operating costs and significant works related disruption, one appropriate use of the funds raised through the Scheme should be towards helping to offset such costs where they are demonstrable, significant and ongoing as a result of a specific intervention or set of works; and that the existing bus reliability and journey time improvement budget in place and overseen through the Southampton City Bus Service Improvement Plan and associated Statutory Enhanced Partnership Board should be one beneficiary of these funds.

Scope of the Scheme

We recognise and agree that the Scheme needs to be directed to those parts of the networks and those times of day, when the cost and wider impacts of works are highest, and affect the largest number of users.

The scheme will impose some potentially significant extra costs on Promoters. While it is important that these charges should be sufficient to achieve necessary changes in behaviour, they will also bear on the economics of Promoters' activity and these should not be unduly or unnecessarily compromised.

With this in view, we note that evidence is clear that current Lane Rental Schemes in place elsewhere have secured substantial traffic management benefits, with no evidence that this suppresses or negatively influences necessary street works, to maintain and reinforce various utility networks. Rather, such schemes lead to more careful planning, scheduling and execution of works such that charges are minimised along with disruption to the operation of the highway.

With this background in view, the explanatory summary provides an excellent synopsis of the current position, and why the scheme scope is certainly now justified. In particular, the County is one of the most densely trafficked in England, with levels of congestion that are well above the wider south east and the country. It is especially pertinent to us, that the worst conditions are experienced in the south of the County, broadly approximating to our operating area; and that levels of congestion affect the overall connectivity – measured in journey time – very substantially, especially in the New Forest. Counter-intuitively, this disproportionately suppresses the attractiveness and relevance of bus services and helps fuel even higher car dependency. This is because travel behaviour places a high price on maintaining a level of control over journey time, and this control is seen as being offered by car use.

We agree that the Scheme should apply to all works, as defined in the Glossary, that require a permit under the relevant section of the OPS executed under: a NRSWA Section 50 licence; an agreement pursuant to Section 278 of the Highways Act 1980; an agreement pursuant to Section 106 of the Town and Country Planning Act 1990. While the latter two categories are apparently not automatically covered by the enabling legislation, the frequency and level of disruption caused are often at least as severe as works undertaken a S.50 License by Utilities. The interaction on a single route of works under a S.50 License with developer activity, for example, can be very severe indeed. At the very least bringing this other activity within scope of the Scheme will incentivise collaborative and better coordinated activity by all Promoters.

Scheme Extent

We note that the Scheme will cover 8.7% of the total highways network, being 764 km. We note that the scope of the Scheme has been informed by empirical data pursuant to government technical guidance. However, while recognising that in such an extensive County the overall proportion of the network likely to be appropriate for Lane Rental will be a rather smaller proportion than in dense urban contexts such as Southampton, this still seems rather low. The published map extent does not include key routes on which major inter-urban bus routes run. Furthermore, in towns such as Eastleigh, where we operate, but also in Basingstoke, Havant and the Blackwater Valley, where we do not, key suburban streets and distributor roads on which frequent bus services¹ operate, are not within the proposed scope.

This being the case, we do not believe that the proposed scheme fully or properly recognises the disruption streetworks and other activity on the Public Highway poses to bus operators.

1 4 or more buses each way per hour in the day time, as reflected in the Regulations on designation of traffic-sensitive locations.

Given the especially serious impact of highways works on bus services and passengers, all bus routes where more than 2 buses per hour pass in any one direction for more than 3 hours per day, should automatically be covered in the Schedule of Specified Locations.

This reflects the fact that even on some quieter suburban routes and rural roads, it is quite possible for the cumulative effects of multiple road works to compound with very serious impacts over extended periods.

This would be compatible with the statutory guidance² regarding designation of traffic sensitive streets, to the extent that, even though the bus frequency test is not met on its own, most of the problematic routes would be either: Ones where traffic flow exceeds 500 vehicle movement per hour (such as the A338 north of Ringwood); Is less than 6.5m wide (a very large proportion of roads served in the New Forest, for example)

We therefore urge the Council to amend its approach to the designation of traffic sensitive locations, with a view to better protecting bus services from disruption. This is entirely consistent, not only with the Regulations, but the County's own policies set out in its recently adopted Local Transport Plan, and its Bus Services Improvement Plan. These place great weight on the need to prioritise bus operations to make them faster and more reliable.

Days and Times Applicable

The scheme should be set up to maximise the duration of works that take place at the least disruptive times, and minimise the overall duration of works.

We recognise that the network under the control of the Council is as diverse in its characteristics as it is extensive. We welcome and applaud that a good deal of thought has been given to how roads and streets are categorised, to strike an appropriate balance between a scheme that is consistent and relatively easy to engage with, while limiting the chargeable periods to those where the impacts of Lane Rental are most likely to be materially beneficial.

While elsewhere in England, lane rental is not chargeable by Highways Authorities on Sundays or Bank Holidays parts of the Hampshire network, especially in the New Forest are exceptionally sensitive to disruption on weekends, and in the peak holiday season in particular. Other localities are also sensitive at weekends.

Therefore, we note and welcome that the Scheme will apply charges at all times that the data indicates that pressure is the highest on the network, including when appropriate on Sundays and Public Holidays. However it is also important to ensure that Promoters have a strong incentive to Sunday and Bank Holiday working, where it is less congested at those times, in order to support for 7-day/week working to significantly truncate overall programme lengths.

“Immediate Works”

This includes works defined by Section 52 of the New Roads and Street Works Act 1991 and include Immediate Emergency & Immediate Urgent works. i.e. The Street Works (Registers, Notices, Directions and Designations) (England) Regulations 2007 (regulations 14 and 16).

Such works are by their nature unplanned and not amenable to management and coordination by the Council. In our extensive and lengthy experience running bus services in the County, such works are prone to having some of the most serious impacts on traffic flow the network, and bus services in particular. This is usually because they interact with the effects of other planned activity on the highway at one or more locations. The greater number and frequency of such planned works makes the additional disruption caused by Immediate Works considerably more likely, and we believe that recent years have seen a substantial elevation of disruption to network operation as a direct result of Immediate Works for this reason.

Legislation rightly protects the prerogative of Statutory Undertaker to undertake highway works on this basis in the interests of public safety, if not service continuity. In so doing, it creates an unintended incentive to abuse this prerogative, however apparently innocuously, to suit the operational requirements of the Undertaking, especially in challenging circumstances. However, the effects on traffic flow and bus operations can be very severe indeed, and the longer these works continue the longer this disruption is suffered.

All truly emergency works should by their nature, be capable of execution within 48 hours. To the extent longer is needed the application of changes thereafter ought to incentivise appropriate levels of resourcing and the best possible execution practice.

Where such works expose more serious maintenance and renewal requirements, these should be progressed properly with appropriate project planning under the scheme, making it more likely the least disruptive programming and applicable appropriate traffic management procedures are considered and effected.

We therefore support the proposals that a 48-hour Charge-free period should apply to Immediate Works, and thereafter the Charges should apply.

Activity by the County as Local Highways Authority

As we state above, we agree that s106 and s278 activity (“road works”) should fall in scope.

We also welcome and applaud that the Council should apply the same incentives and disciplines to its own activities. In many cases the nature of these works would be likely to make them eligible for a waiver or discount, for example significant highways improvements.

However, the presumption should be that the changes apply with a view to “pricing” the level of disruption envisaged and allowing a transparent means of assessing whether the programme is appropriate in supporting the Council in achieving its Network Management Duty.

This would also incentivise s. 50 utilities activity to be programmed and undertaken in a more coordinated manner, where possible collaboratively, with the Council’s capital works programme.

Collaborative Works

It is very clear to us that some of the most serious disruption on a given bus route or route group is caused by un-coordinated works by multiple parties. It is particularly problematic when two sets of works take place on the same or closely-related sections within a short period of time, when a single programme, and possibly, a single project, might have effected the same outcomes. At times it is quite credible to suppose that this might have reduced direct delivery costs for each Promoter, or the Council itself, where its own road works are concerned.

Thus, we welcome and support the principle that collaborative works should attract a substantial discount. The Consultation indicates at 5.4.7 that a 25% minimum discount would be attracted by each collaborating Promoter.

We believe that a substantial discount is likely to be necessary to offer sufficient incentive to collaborate. We are not convinced that 25% is a suitable minimum level. In line with practice elsewhere, we would urge the Council to discount charges by no less than 50% to each of at least two collaborating Promoters, to help maximise the incentive on this kind of behaviour. This may be particularly useful and relevant to the Promoters of works involving broadband.

Major Infrastructure Improvements

It is right and rational that works that deliver significant highway infrastructure improvements, substantially extend/renew the longevity of an asset, or future proof a highway to protect it from being excavated again, should be considered for a discount or waiver. It is important that criteria exist that ensure such discounts or waivers reflect a suitably material benefit to Councils wider Network Management Duty.

We recognise and agree that many of the County Council's own works might be eligible for such charges and waivers. There may be an especially good case to seek to apply such a discount or waiver on capital schemes where the Lane Rental Tariff would otherwise substantially burden the costs and indeed the value-for-money of a scheme.

Aligning the discount/waiver scheme with that for collaborative works would be more likely to incentivise the programming of asset renewals and upgrades with major wider capital schemes, and we would strongly suggest that this is made clear in the final Lane Rental Scheme. This could also help facilitate the installation of sub-surface plant within major schemes that allow for much quicker and easier future access, and mitigate against damage to assets, such as multi-utility service ducts.

This is referenced in the consultation material at 5.4.4 as a 25% discount. Again we are concerned that this might be insufficient. Further for major capital schemes – such as installation of new bus lanes or other bus priority measures – it could start to burden the costs and thus both viability and value-for-money of the Council's own works, as well as that of other parties, for example developers delivering significant off-site highways mitigation schemes. We urge that a minimum rate of 50% is applicable in line with that for collaborative works.

It is essential that the impact on scheme viability for major improvements is considered fully in the Final Lane Rental Scheme. We are not convinced that the current evaluation does so.

Surplus Revenue Policy

The costs of disruption arising from road works fall disproportionately on bus operators, along with the practical disruption on our customers.

It is therefore just and reasonable that such costs should be ones that are eligible for reimbursement from surplus revenue from the Scheme. We note that at sections 7.2.2 "Surplus revenues (revenues from charges after deduction of reasonable costs) will be applied for purposes intended to reduce the disruption or other adverse effects arising as a result of street works."

While broad, this is clear. It demonstrably accords with the principles of the Scheme, which is that the direct costs of road works on other parties are recognised by the Scheme.

We note an open process of bid for funds is anticipated set out at section 7.2.4, through submission of a business case to a Lane Rental Scheme Governance Board. We welcome and support this in principle.

However, this is likely to be a retroactive process, and where the costs of roadworks on bus operators is concerned, there can be little sense that any sums will be available, nor when, or how much. We therefore urge that, at least, the County Council's Principal Public Transport Officer should sit on the Board, and that there is a presumption that a material proportion of the budget should be allocated to the Hampshire Enhanced Bus Partnership ("EBP")

to offset the additional costs on bus operators of specific roadworks, with transparent and robust evidence of such disruption and attendant costs presented to the Board as may be necessary from time to time.

A typical example of this would be to compensate bus operators for shuttle services which are necessary to be operated when roadworks make part of a route inaccessible. At present the cost of providing these services falls on the operator, with no budget being available to support this from the council or from the contractor performing the works and therefore operators have a difficult decision to balance cost against doing the right thing for customers whose journeys are already impacted by the works.

Another example would be to invest temporary extra peak vehicle and driver resources in services where a detriment to running time is anticipated as a result of material works. The EBP would need to agree some form of pro-rata tariff for this, based on additional bus operational hours demonstrably required, to avoid excessive negotiations between operators and the Council, but this should be relatively straightforward to achieve.

Concluding Comments

For the reasons set out above, Go South Coast Ltd. trading as Bluestar unequivocally endorse the County Council's decision to apply for these powers.

We conclude that, if implemented appropriately, there will be a direct positive impact on bus operations, whether considered in terms of reduction of the degree of disruption and its duration.

We are broadly in agreement with the proposed terms of the scheme. However, it is important that the Scheme Scope is wholly fit for purpose. In particular, we propose that all streets and roads where more than 2 buses per hour operate in any one direction, should automatically fall within the Scheme. This affords an appropriate balance between ensuring the scheme effectively supports reliable and efficient bus operations, without bringing an excessive large extensification of the Scheme.

In addition, we consider it important that the funds generated by the scheme are applicable to defraying what can be substantial additional costs to bus operators arising from otherwise unavoidable disruption.

As the County Council is separately seeking to greatly promote the quality, effectiveness and relevance of bus services to meet its wider transport policy goals, it is that much more important that all relevant and credibly effective measures are taken to support the effective discharge of the Network Management Duty.

CityFibre (Statutory Undertaker)

I am writing regarding Hampshire County Council's proposal to add a total of 524 streets to the Lane Rental scheme, including 29 non-traffic-sensitive roads.

Could you please provide the supporting evidence justifying the inclusion of these 29 non-traffic-sensitive streets? Specifically, any data showing increases in traffic volumes or changes in traffic patterns that have led to their consideration under the scheme would be highly valuable.

Understanding the underlying data will aid in assessing the potential impacts and benefits of this extension.

Additionally, I would like to propose the following waiver considerations for the Lane Rental scheme: (1) Government projects, such as BDUK and HS2, be granted a 3-day waiver from Lane Rental charges to support the efficient delivery of these critical infrastructure initiatives. (2) Any jobs not involving excavation or breaking up the road surface (e.g., test rodding, roping, or activities involving lifting of chambers for asset inspections) be granted a 1-day waiver, reflecting the lower impact these works have on road condition and traffic disruption.

First Bus (Transport Operator)

Our response is positive to any scheme to reduce the impact of congestion.

The local team would be able to provide any more specific insight on these locations.

Gosport Brough Council (Local Council)

Thank you for consulting Gosport Borough Council on the proposed Lane Rental scheme, we wish to make the following brief comments and observations.

We are very pleased that all the main routes within the Borough (Gosport and Lee-on-the-Solent) are covered by the scheme. As you will be aware the Borough suffers high levels of congestion, particularly in the peak periods, and we therefore welcome the proposals to afford the main routes graduated protection based on their status / traffic volumes, which I am sure will also be welcomed by our residents and businesses too.

Whilst there are also clear benefits in terms of reduced time to undertake works, we consider that this must not be of detriment to the quality of the work / highway re-instatement, nor to the amenity of residents if there is an increase in the amount of over-night / weekend working.

In due course we would be pleased to hear the outcome of the consultation.

Hampshire 2050 (Internal Team)

Policy

Minimising disruption to transport users from street works and highway activity is a key policy in Hampshire's Local Transport Plan 4 (LTP4). Hampshire 2050 supports support the scheme's implementation and agree with the principle that all future works should be included.

The Lane Rental policy should explicitly aim to reduce disruption for walking, wheeling, and cycling, in line with the Road User Utility Framework (RUUF).

While Section 278 developer works are currently excluded, these can cause significant disruption. We recommend exploring a similar rental mechanism via the licensing process.

The emerging Movement and Place framework, being developed by the H2050 Transport Policy team, is not yet mature enough to inform the current network but should shape future iterations.

Some parts of the network such as the Eclipse Bus Rapid Transit Route have not been included because their status is protected via other mechanisms. It would be useful to highlight which routes would have been in the scheme but have not been included because they are protected via other mechanisms on an accompanying map.

Walking, wheeling, and cycling. Night works may increase - consideration needs to be given to the impact of diversions during hours without street lighting, particularly for users with protected characteristics and those using active travel. There should be an exploration of incentives or discounts for works that improve walking, wheeling, and cycling infrastructure. There are alternative existing measures in place to manage the impact of street works on dedicated walking and cycling infrastructure; it would be useful for the policy to set out what these measures are.

Impact on schemes in the Gateway Process. Schemes already in Hampshire County Council's Gateway process should be exempt from lane rental charges. Adding costs will affect viability, offer little public benefit, and risk reputational damage with elected Members and the public. Future schemes can factor in lane rental costs from the outset, so their viability should remain unaffected.

Governance of grant funding. Future grant decisions will be made by a board including utilities and Hampshire County Council. We recommend that the H2050 Transport Policy team lead on establishing the terms of reference and support on an ongoing basis as chair or vice chair of the meetings. Clarification is needed on eligible grant expenditure – specifically status as capital or revenue. Many innovative schemes will be revenue in nature. Priority should be given to the County Council to cover costs of schemes that improve traffic flow, for including buses and active travel. Consideration should be given to up to 100 per cent discounts for County Council led schemes aimed at reducing congestion or improving alternatives to travelling by private car. Funding could also support training and guidance for operators to improve roadworks for active travel users - going beyond current practice to give more consideration to all forms of traffic and road users as per the HCC Road User Utility Framework.

Comments on proposed lane rental network

Movement and Place

HCC has set out in LTP4 its intention to develop a movement and place network. In due course this may require changes to the lane rental network. The process for changing the network should be clarified. In advance of the movement and place framework the following comments are made about the network as proposed.

Road removals

Some roads are in the proposed network because they carry high volumes of traffic. In some cases, such volumes are inappropriate when considered in light of the places the roads go through and their impact on people and the desire to reduce the impact of traffic. Considering this, we would suggest removing roads that fit this description. An example being the A336 (Netley Marsh to Cadnam). It has high flows but has a low movement purpose; may be redesigned to a lower standard road; has a parallel motorway that offers a better level of service without harming local communities; and is a candidate for reclassification to a B road.

Bus routes

Ensure key public transport corridors are included.

Lightly trafficked dual carriageways

Roads such as the A3090 (Romsey to A36), A31 (Four Marks to Farnham), and A30 (Hook to Basingstoke) may not warrant lane rental charges due to low disruption from single lane closures. Such roads have more capacity than is required and may not be adversely impacted by road works if only one lane is removed. If an organisation can show nil congestion detriment from the road works, they undertake then no charge should apply.

Missing routes

Consider adding key bus priority corridors not currently covered.

Devolution and LGR

Consideration should be given to delaying implementation to allow the new Mayor and Combined Authority to consider the case for a regional scheme. A regional scheme would likely have economies of scale in administration; have common standards; frameworks and policies; be better cognisant of boundary issues; and make it more efficient for utilities and work promoters to engage with the scheme.

Hampshire County Council - Engineering Services and Highway Delivery (Internal Team)

The permit scheme NCT's provide the Highway Authority control when road space is available and what TM is used so why is a permit scheme actually required? Have we challenged the government section that has insisted that LR be developed

These costs will be passed on to consumers via Council Tax, bill payers and House Buyers, is there a risk that this will be viewed as a stealth tax (especially by developers) and will almost certainly increase price inflation in the wider economy? If no difference in the number of works being carried out at TS times is observed will the scheme be ended?

3.3 doesn't include S171s or S184s? Arguably they would fall under 3.3.1i but then so does 3.3.1iii

3.4.3 – but what if the TM then restricts the carriageway to enable the footpath to be diverted similar to 3.4.4

I appreciate the Permit scheme will remain in place but is there any evidence to show if there is likely to be an increase in night works? This could be more disruptive for those living nearby.

Are there any safety concerns over Promoters opting for lane closures (£1,500 per day) when previously they may have gone for a full closure (£2,500 per day)?

I have noticed some routes only seem to be traffic sensitive at one end. For instance, Green Street (ID 494) and Forge Road (ID 315) are on the East end of the B3004 near Bordon but the west end near Alton has no restrictions. Why is this?

Private clients, in my case developers, may want to see a list of projects that tells them where the charges is being spent on. Will this be made available to HES to be able to send to querants?

If a scheme requires a number of different permits, some attracting LR some not, and assuming that Lane rental is linked to the permit, can the team confirm that the LR payment is made at the completion of each permit rather than for the whole job?

How and when will Streetworks confirm the LR charge sum for a particular permit? On Street manager approval?

Will DCO works be charged LR?

Hampshire County Council - Transport Planning (Internal Team)

Some minor comments on timing of lane rental:

Alencon Link – is a key sustainable travel interchange so would suggest that it should be a dark blue at least or even red as disruption would impact on bus / rail interchange.

A33 – the red all day lane rentals ends just south of Whitmarsh Lane, it might make sense to extend it north up to the Taylors Farm roundabout (Redlands Farm Avenue / Gaiger Avenue). Especially in light of the amount of development expected along that corridor over the next few years.

A339 – future proof it by extending the red all day lane rental further north to Rooksdown Lane to cover new development at North Manydown

Eastleigh. The lane rental for the B3354 is incompletely mapped – see below. Also remove the stretch of A334 once by-pass opens. Might want to include Wildern Lane in Hedge end for the morning and evening peak – Wildern Secondary school, shamblehurst primary, number 3 bus route and shows high lost link travel time on Trafficmaster data. Is there a reason why only part of Highbridge Road is included? I would have thought that any works along the northern section would have a similar impact to those on the southern section. East Hants. I would have expected the one-way system/route through Petersfield to be included (B2070, College St, Ramshill)

Fareham. Add section (everyday) of Redlands Lane between A27 and Henry Cort Way. This is a 'main inter-urban' bus route for the Eclipse services and others.

Gosport. Add Stoke Road as is Eclipse bus route. This is a high frequency 'main inter-urban' bus route for the Eclipse services and other bus services. Consider whether Eclipse route should be everyday timings.

Hart. Eversley Road/Reading in Eversley/Yateley has two short sections missing between included sections. Would appear to make sense to join these up. Should Ivley Road be subject to lane rental, feels a missing gap and an important part of the network

Havant. Add Solent Road between Brockhampton Road and Park Road South. This will provide a continuous route in the town centre between Harts Farm Way and A27/Park Road South roundabout. Solent Road gets very congested due to the retail parks which causes tail backs to A27 junction and in the town centre.

The A259 Havant Road section should start further west at the A27 Warblington/Emsworth Road and not at Blandings Way. As this is a 'main inter urban' bus route (service 700) suggest upgrade priority to red (6.30 to 1830) as this is a very traffic sensitive road and any road works creates tailbacks to A27 junction.

New Forest. The A338 between Ringwood and Fordingbridge (and northwards) should probably be included – it's the only part of the MRN that isn't subject to lane rental

Rushmoor. I think more of the high frequency bus corridors should be part of the lane rental e.g. Kingsmead in the town centre, Alexandra Road through North Camp, Queens Avenue (though as this is an MoD road maybe not possible).

Test Valley. A3057 heading south from Andover, the lane rental area only reaches the northern slip roads for the A303, I would have thought it should cover both parts of the junction.

A343 heading north out of Andover, I'm not sure this needs to extend as far, think it could probably terminate at the Saxon Way roundabout

North Way/Fuller Way in Andover. This is the only crossing of the railway east of the A343 (and the A343 crossing is a significant pinch-point). While only a local road, the impact of roadworks which remove the link from use would be significant.

Winchester. The full extent of the one-way system should be included e.g. High St, Upper St (B3404), Gladstone Street

Openreach (Statutory Undertaker)

Openreach appreciates the opportunity to respond to Hampshire Lane Rental Scheme proposals and thanks Hampshire for sharing them.

We have reviewed the documents submitted as part of this consultation and have set out below our key concerns and reasons for opposition.

Hampshire Lane Rental Scheme Document

5.3 Lane Rental Charge Categories

Openreach has concerns on Hampshire not using the 'High, Medium and Low ' charge banding system that many other highway authorities have used. Government guidance states each individual scheme must set out the level of charges that will be applied. Levels of charges set out in any proposed scheme will need to be fully justified in each case. It will not be sufficient for authorities simply to apply the maximum charge level without clear justification.

5.4.3 Major infrastructure improvement

This should be full discount as it would be improving the local area. In regards to Openreach, we would expect a full discount on any fibre builds, as we are upgrading the broadband in Hampshire for the wider benefit.

5.4.5 Collaboration. 'Any opportunity for two or more Promoters to collaborate in order to reduce the occupation of the highways is strongly encouraged. 5.4.7. Where two or more sets of works are carried out in collaboration concurrently, the lane rental charge will be discounted by a minimum of 25% for each Promoter during the period of collaboration. A full waiver for collaborative or joint works should be implemented in line with DfT guidance; without it, there is insufficient incentive to collaborate, and the scheme risks falling short of its objectives.

Discounts and waivers.

Could Hampshire clarify whether discounts and waivers will be applied automatically during the permit application process, or if undertakers will need to submit a separate request?

Operation and Evaluation of Hampshire's Permit Scheme

Openreach has been able to locate any evaluation reports for Hampshire's permit scheme 2021/22, has a evaluation report been done 22024/25?

Additionally, the current permit scheme documentation appears unchanged since 2022, despite updates to relevant legislation, codes of practice, and operational guidance. For authorities pursuing a lane rental scheme, it is essential to demonstrate that a robust and well-managed permit scheme is in place, supported by appropriate data and evidence. At present, Openreach does not believe sufficient evidence has been provided to confirm this.

Lane rental timings

Openreach is concerned that Hampshire has not appropriately aligned traffic sensitivity timings with the proposed lane rental charging periods. Of the streets proposed, 78 are subject to charges 'Everyday from 06:30 – 18:30' —representing nearly 18% of the scheme. This leaves limited scope or incentive to schedule works outside of chargeable hours. Greater flexibility is needed, particularly during off-peak windows between morning and evening peak periods, to facilitate more efficient delivery of works.

In the LRS Guidance for English authorities, one of the incentives to encourage promoters to minimise their exposure to lane rental charges is to make greater use of evening or weekend working. By charging lane rental on weekends this will discourage promoters to change working practices rather than encourage it.

Environmental impact

The scheme document appears to lack provisions for environmental considerations when scheduling out-of-hours works to avoid lane rental charges. A formal process should be established between the Hampshire StreetWorks and Environmental teams to ensure undertakers are not penalised if environmental constraints prevent out-of-hours completion, despite reasonable efforts. In such cases, Openreach would expect lane rental charges to be waived.

Could Hampshire please clarify the out-of-hours Environmental Health application process, including lead times and any waiver provisions for works that cannot be scheduled outside standard hours.

Given Openreach's outstanding concerns regarding the incomplete TSS review and the concerns addressed in this Lane Rental consultation. Openreach considers the proposed Lane Rental scheme incomplete and non-compliant with DfT lane rental guidance. Openreach respectfully requests that Hampshire County Council pause the consultation until all issues are resolved and agreed upon by the relevant stakeholders.

Portsmouth Water (Statutory Undertaker)

We are doing some pre-planning prior to LR coming into force. We have reviewed your list of traffic sensitive road and the below two are not on that list but we know these are busy road. Please can you confirm these won't become LR? Mitlon Road Cowplain; Hambledon Road Waterlooville

Anonymous Response 1 (Member of the Public)

I am writing in response to the consultation on Hampshire County Council's proposed Lane Rental Scheme. As a resident of Winchester with extensive experience in complex systems, government operations, private and public sector contracts and project delivery, I have reviewed the consultation documents with interest. While the objective of reducing disruption is understandable, I believe the proposed scheme may inadvertently undermine that goal. I offer the following observations for your consideration: [listed separately].

Behavioural Consequences.

The scheme incentivises time avoidance rather than quality and distorts how contractors assess and manage project risk. Contractors may compress schedules unsafely, avoid work on traffic-sensitive routes, or adopt low-quality methods to reduce charge exposure. The impact of these penalties is also price-sensitive: for smaller contractors, a £2,500 daily charge could represent a significant portion of a project's total value, potentially deterring participation entirely. For large contractors managing multiple frameworks, however, these penalties may be absorbed as a calculated cost of doing business—especially if they can cross-subsidise or anticipate the risk in their tendering. This could reduce market competitiveness and promote behaviours that prioritise penalty avoidance over long-term value or public benefit. These dynamics do not support the stated objective of building long-term network resilience.

Engineering Realities

Delays are not always waste. Engineering constraints such as concrete curing, settlement monitoring, utility testing, and mandated safety audits require time. Penalising adherence to these processes risks compromising technical standards and increasing future maintenance.

Administrative and Legal Costs

Introducing a financial penalty mechanism creates a new front of potential disputes—charging accuracy, waiver eligibility, justifications for extensions. The result may be increased legal and administrative overhead for both contractors and the council, eroding efficiency gains; resources better spent in technical oversight by both parties.

Impact on Resource Allocation Across Contracts

Large contractors typically manage multiple, concurrent projects and allocate resources flexibly across them to respond to shifting priorities, weather delays, supply chain disruptions, or emergencies. The Lane Rental Scheme, by introducing daily financial penalties at individual sites, risks distorting these wider delivery strategies. Depending on price sensitivity, contractors may be forced to prioritise works with the greatest exposure to charges, rather than those that pose the highest risk to the network or public. This undermines efficient, risk-informed resource allocation and penalises systemic interdependencies that are inherent to modern infrastructure delivery.

Communication, Not Coercion, Is Key.

Motorists, for example, are often frustrated not by the presence of unattended cones, but by the absence of explanation. A simple sign reading: “Concrete curing – Road reopens Thursday 12:00 – Early opening risks collapse” does far more to build public trust than a punitive charging regime. Public understanding improves dramatically when the ‘why’ is clear. Transparent communication should be central—not peripheral—to any disruption mitigation strategy.

Conclusion

In conclusion, while the Lane Rental Scheme is well-intentioned, I believe the accompanying Cost Benefit Analysis may be optimistic or omit relevant dimensions of risk and operational complexity. Furthermore, the positive experiences cited by other councils do not provide medium and long term data on the downstream effects of the scheme - data that may call its efficacy into question, particularly once set up and running costs are sunk. In sum, Lane Rental risks distorting behaviour, compromising technical integrity, and introducing significant administrative friction. A more effective approach would prioritise coordinated oversight, engineering-informed scheduling, and clear public communication.

Anonymous Response 2 (Member of the Public)

I fully support this proposal and am amazed that you don't already charge lane rental. Also please will you review the use of multi point temporary lights, many of which are completely unnecessary. Two way lights are often quite sufficient.

Anonymous Response 3 (Member of the Public)

Increased Costs for Consumers

Lane rental fees are often passed on to utility companies and then to consumers through increased service charges. The focus on generating revenue through lane rental could overshadow the primary goal of reducing disruption, potentially leading to higher costs for the public. The cost of lane rental, combined with other fees and charges, could make it uneconomical to carry out essential infrastructure projects like broadband or electric vehicle charging. So lane rental is just a revenue-raising scheme for the council to be paid for by Hampshire residents.

Balancing Efficiency and Safety

While lane rental aims to incentivize efficient work practices, there's a risk that companies might cut corners on safety or quality to avoid high fees. A defined framework is needed to ensure that repairs are completed to a good standard and that safety isn't compromised in the pursuit of efficiency. Authorities need to carefully balance the need for timely completion with the need for safe and high-quality work.

Administrative and Oversight Challenges

Implementing and managing lane rental schemes can be complex and require significant administrative effort from both local authorities and works promoters. Authorities need to clearly define the roads where lane rental applies, the specific timings for charges, and the framework for using the revenue generated. There's a need for transparent and accountable systems to oversee how lane rental funds are used and to ensure the scheme's effectiveness and fairness. An over-reliance on lane rental schemes could detract from other strategies for managing roadworks and reducing congestion.

Potential for Unintended Consequences

If not carefully managed, lane rental schemes could lead to a perception that the schemes are temporary, potentially discouraging long-term investment in behavioral changes by works promoters. There's a risk that the schemes might not achieve their intended impact if they are not consistently applied or if the charges are not proportionate to the disruption caused. The effectiveness of lane rental schemes depends on the extent to which works promoters adopt different working practices in response to the charges.

Anonymous Response 4 (Members of the Public)

Utility companies & their contractors are well versed in identifying opportunities within lane rental schemes to minimise their costs. Therefore, please ensure that the terms (& enforcement) of the scheme are clear concerning the management of works to minimise the practice of: dividing up works to avoid a full road closure cost (where this leads to longer, partial lane closures); & prematurely closing up works (avoiding overrun penalties or peak time costs), thereby needing a return in order to properly backfill & surface finish & causing additional traffic disruptions.

Operational guidance should also continue to promote joint working practices between companies where these can be programmed together to help minimise overall costs & disruptions. Where there is a case for sequential working, guidance might suggest submitting such evidence prior to approval of works & the application of lane rental charges.

Anonymous Response 5 (Member of the Public)

I think this is a bad idea, why because the cost will just be passed on to the consumer, higher prices, to think otherwise is short sighted as the Chancellor has already proved with the NI increase.

Fines are much harder to pass on as legitimate costs. Say for example all contractors gave you submit a plan and timescale, going over the timescale incurs a fine, the fine was be declared to customers and in accounts presented and must not effect consumer prices, I.e. they have to eat the fine in their margin. There should also be a feedback fine to the contractors customer so they can't just wash their hands of it sending the contractor broke, I.e. forcing a timescale they know the contractor can't make but not their problem. Make it their problem as well.

I know the thoughts will be extra revenue from lane rental but at then of the day that just ends up as another tax as it WILL be passed on in costs you can't stop it. Fines being passed on could be stopped. This needs a rethink.

Anonymous Response 6 (Member of the Public)

Just to let you know that we are in full agreement with your proposal and wish you good luck at bringing it into effect.

Anonymous Response 7 (Member of the Public)

I mainly reviewed the cost benefits paper as that is where the business case and proposals stack up or not. In my opinion the content presents several potential pitfalls. Firstly, the reliance on historical data from other lane rental schemes may not accurately predict outcomes in Hampshire due to differing local conditions, which could mislead stakeholders.

Secondly, the absence of detailed data on increased costs to promoters and the lack of quantification for certain outcomes, such as repeated works, raises concerns about transparency and completeness.

Additionally, the assumption that surplus funds will be effectively used to mitigate disruption is not substantiated, potentially masking the scheme's true financial implications. Lastly, the complexity of the terminology and methodology may obscure understanding for non-expert stakeholders, leading to confusion about the scheme's actual benefits and costs. This could hinder informed decision-making and public trust.

How will you be able to ensure that contractors don't just pass the cost of lane rental charges onto local councils or ultimately to the public through increased service fees or project costs. This practice is common in many industries where additional operational costs are incurred. If lane rental charges are viewed as a business expense, contractors might adjust their pricing models to account for these costs, potentially leading to higher overall expenses for the councils or taxpayers.

This could undermine the intended benefits of the lane rental scheme, as the financial burden may not be absorbed by the contractors but rather shifted to the local authorities or the public. Transparency in pricing and clear communication about how these costs are managed will be crucial to ensure that the scheme achieves its objectives without unintended financial consequences.

The same aims and outcomes could be achieved by having better written contracts or using an incentivised / added value contract KPI's I.e profit at risk after the agreed contract delivery date and or achieving additional profit for every day delivered early.

This will not require £100k set up fees nor a contractor to manage the scheme which will enable the additional funds to be available in the unlikely event that a contractor finishes early or meets the contracted KPI's for first time fix without returns within x or y.

Anonymous Response 8 (Member of the Public)

Hampshire Highways is one of the worst culprits in blocking lanes for needless lengths of time. So often your works can be seen without any activity for day after day, apart from temporary traffic lights, pointlessly holding up traffic. So are you going to charge yourselves for lane rental, futilely transferring money from one HCC account to another as a measure of the absurdity of this consultation?

Rushmoor Borough Council (Local Council)

Thank you for consulting Rushmoor Borough Council on Hampshire County Council's proposed Lane Rental Scheme and proposed changes to existing traffic sensitivity. We support the principle of the Scheme and have no further comments on the details of the proposal at this time.

Rushmoor Borough Council - Environmental Health (Local Council)

The proposal for a lane rental scheme includes a limited number of roads within the Borough. These roads are identified (amongst others in the County) as the most congested and critical parts of the network.

While we welcome the alleviation of congestion and the positive benefits that can bring locally, we are also concerned about displacement of works resulting in an increase in overnight work with noise that may affect local residents.

To this end we seek confirmation that this concern has been taken into consideration having regard to any evidence from the other recently introduced schemes. Furthermore, prior to commencing the scheme, appropriate management systems are implemented to, so far as is reasonably practicable, prevent noise impacts and minimise the impact where unavoidable. Any systems to manage noise should not place any further burden on Rushmoor Borough Council (and the other second tier authorities) and be funded and controlled by the Hampshire County Council.

In the event that additional costs are borne by the Rushmoor Borough Council as a result of the displacement of work to more noise sensitive times we seek that provision is made to reimburse those costs from the proceeds of the Lane Rental Scheme.

In any event we recommend that full details of all works falling within this category be notified to the Rushmoor Borough Council in advance of them being initiated.

SEJUG (Statutory Undertaker)

General

SEJUG believes that Lane Rental should not be introduced and that the existing 'well run' Hampshire CC Permit scheme enables Hampshire CC to control the timing of works by directing Utilities to conduct works at certain times, and for set durations. Along with s74 NRSWA, these are adequate to fulfil the Network Management Duty of Hampshire CC under the Traffic Management Act. A Lane Rental Scheme also make it harder for SEJUG members to deliver vital infrastructure services, and value for money for consumers.

Consultation Letter

The Hampshire CC Lane Rental Consultation letter states the following: "In addition, in accordance with Part 2 of the Schedule of the Street Works (Registers, Notices, Directions and Designations) (England) Regulations 2007 the Council will provide notice during this consultation for their intention to make changes to the designation for a street as traffic-sensitive for those streets being proposed for lane rental" The DfT/HAUC Co-ordination Code of practice s 5.4.2 states 'Authorities should review their existing designations before the end of 2023 to check if they have any streets designated under one of these three criteria and they should assess whether a traffic-sensitive designation should still apply to those streets.

It may be that one of the remaining criteria will continue for apply, for example, the street may carry more than eight buses an hour. However, if another criterion does not apply, the designation should be removed at the earliest opportunity so that access for street and road works is not unnecessarily restricted and traffic sensitive rates are not inadvertently charged as part of permit fees' SEJUG would like to ask Hampshire CC why the Traffic Sensitive Street Review was not completed before the end of 2023 as per the above DfT guidelines? This also applies to the additional Traffic Sensitive Street Review that Hampshire CC submitted on the 18th of July. SEJUG believes that it is reasonable to request that the Traffic Sensitive street review is carried out before a Lane Rental Scheme consultation takes place.

SEJUG is concerned that to carry out a full Traffic Sensitive Street review by its members is consultation is very time-consuming process and with the added burden of a Lane Rental consultation taking place at the same time. This places it's members under a severe challenge to meet the timescales for response to both consultations.

Consultation Overview Document

P5 – 'lane rental timings must allow Promoters real opportunities to reduce or avoid exposure to charges by carrying out works in less disruptive ways.' SEJUG fully support this comment.

P9 – SEJUG supports Hampshire CC proposing 8.7% of the total network length to be covered by Lane Rental, as this is in line with DfT current guidance which recommends between 5-10% be used with a maximum of 10%.

P16 – ‘In parallel with this consultation the Council will serve formal notice of their intention to make relevant changes to traffic-sensitivity designations for the lane rental network as set out in Part 2 of the Schedule of the Street Works’. SEJUG would like to re-iterate (as per the above comments) that this exercise should have been carried out pre-Lane Rental consultation (and in line with DfT Guidance).

Benefits of a Lane Rental Scheme – SEJUG would like to ask whether Fatigue Management, Environmental working restrictions and Regulatory timelines have been considered in the construction of the Consultation, as these will all have an impact on how SEJUG members can work within a Lane Rental Scheme? SEJUG is aware that the proposed Lane Rental Scheme will cause increased risk to Health and Safety (working out of hours), environmental breaches and challenges to duration of works. With this in mind, can Hampshire CC please confirm that COPA (1984) - Control of Pollution Act timings (8am-6pm Monday to Friday and 8am-1pm Saturday) have been considered during Scheme design, and that Hampshire CC has obtained their Environmental Departments consent & agreement for all noisy works to take place during the non-lane rental times on the Specified Streets.

SEJUG is also concerned about the benefit of “Work completed to specified standards first time, avoiding a return visit”, as this will result in works being carried out more quickly or out of hours in order to avoid charges, and could therefore impact the reinstatement quality, resulting in return visits.

SEJUG is concerned that Lane Rental charges will apply on weekends and bank holidays in some cases? SEJUG would like to see the justification for these cases.

The suite of documents confirms that as long as 2-way traffic flow is maintained, then Lane Rental charges will not apply. Can Hampshire CC when works are started outside of Lane Rental charge times and then are plated over to restore the highway to full public use that no charge will be applicable?

The Consultation Overview document states under “Lane Rental Charges” that “A successful lane rental scheme would result in all relevant work being undertaken outside of the designated peak times, and therefore no charges applied”. SEJUG members are unable to predict the number of faults/mains bursts/loss of service to their assets resulting in the need for immediate response and therefore avoidance of Lane Rental charges may not be possible if the works exceed 2 days.

Cost Benefit Analysis (CBA) Document

P2 – Outcomes – SEJUG would like to point out that the behavioural change mentioned in the table won’t result in a reduction in occupation for planned or unplanned works, but it could have the effect of increasing the duration of works to avoid Lane Rental charges.

P9 - Increased cost to Promoters to avoid or mitigate for charges, per peak work moved to off-peak (2024 prices) – range depicted on the table of between £200 - £350 seems extremely low and would not encompass all of the factors below that need to be taken into account. SEJUG would like to ask whether the following factors have been taken into account during the construction of the Lane Rental Scheme:- Extra cost / uplift for supply chain delivery of materials at weekend (e.g. tarmac); Logistics of disposal of spoil / muck away at weekends; Extra Management and Supervision to be employed at weekends; Extra support drivers will be required for grab lorries; Additional cost of opening suppliers at weekends; Further supplier and statutory undertaker resources required to manage incoming customer calls related to why works are being undertaken at weekends; If works cannot be completed to permanent reinstatement, then could be a cost of interim to permanent reinstatement at a later date.; Extra potential NRSWA Administrative staff to cover Permit / notice applications at the weekend.

P11 – ‘As the Lane Rental scheme operates alongside a permit scheme with shared or similar processes, the net additional administration cost for Promoters under a lane rental scheme is considered negligible and has not been quantified’. SEJUG suggests that the extra amount of Lane Rental charges that will need to be verified (over and above Permit costs) will have an administrative burden on SEJUG members.

SEJUG would like to ask whether the breakdown of the running cost of £987,000 per year to run can be supplied as not clearly stated within the CBA document.

As the proposed Scheme states that the scheme is “Very High Value For Money”, this suggests that revenue will be generated far exceeding costs. SEJUG asks that Hampshire CC confirm that the proposed Scheme is intended to reduce congestion and disruption on the Network and encourage Utilities and Hampshire CC works to be more efficient, and not an additional revenue stream by for the Authority.

SEJUG acknowledges that the CBA document recognises that the proposed Lane Rental Scheme will have an additional financial impact to its members but would like to flag up that Utility regulators deem Lane Rental as an allowable cost, thereby allowing additional costs incurred being ultimately passed back to Customers within the Hampshire CC Area, resulting in an increase in Bills.

Hampshire CC has quoted 2017 and 2018 prices when calculating the costs a Utility will need to consider - (DfT Lane Rental Impact Assessment which estimates average daily cost for all day working to be £250, and for out of hours working £350 (2017 prices), and DfT Lane Rental Impact Calculator tool which provides default estimates of a peak working cost of £500 and a 40% uplift for off-peak working giving an off-peak works cost of £700 (2018 prices)) – SEJUG would like to ask why more up to date figures were not used, as 2017/18 figures do not reflect current costs/wages/additional resources required when working out of hours.

Lane Rental Schedule

Please see comments below regarding several places along the indicated TSS routes that have been included as a Lane Rental designation but are clearly residential side roads or not part of the main carriageway. Please can Hampshire CC provide clarification of the TS status or confirmation that the relevant discrepancies below have been rectified before the Hampshire CC Lane Rental Scheme goes live and that these will be amended and removed from the TS & LR Schedule.

SEJUG does not agree with the designation of traffic sensitive streets (and therefore Lane Rental Streets) highlighted below:-

Southampton Road – USRN 26723626 (At the location depicted below) This small side road runs alongside the main Carriageway but is a separate area and should not be classified as TS. This is not a thoroughfare or main carriage way. Residential side road to main street please devolve from USRN or mark as non-TS, as this part of the USRN does not meet the requirements of TSS.

2. Marchwood Bypass - USRN 26719827 (At the location depicted below) Can you please confirm why there is an off shoot from the main carriageway at this location. Mapping does not match reality. Please confirm the TS status of these 2 offshoots, or remove from TS mapping.

3. London Road – USRN 2100026 (at the location depicted below) This small side road runs alongside the main Carriageway but is a separate area and should not be classified as TS. This is not a thoroughfare or main carriage way. Parking area to main carriageway please devolve from USRN or mark as non-TS as this part of the USRN does not meet the requirements of TSS.

4. Reading Road – USRN 16709894 (between A327 and B3272) Please confirm why this part of the USRN has been classed as Blue level TSS (Monday to Friday 06:30-18:30; Saturday 10:00-16:00; Sunday 10:00-16:00). Should the TS category of this part of the USRN be Green (Monday to Friday 06:30-09:30 & 16:00-18:30) due to the school and local A Road? Please clarify why this category has been chosen.

5. B3272 from Yateley North to Roundabout with A30 This has been designated as purple (Monday to Friday 06:30-09:30 & 16:00-18:30; Saturday 10:00-16:00; Sunday 10:00-16:00) when the other elements of the B3272 have been designated as Green (Monday to Friday 06:30-09:30 & 16:00-18:30). Can you please justify why this part of the carriageway needs to be traffic sensitive on a weekend, when other parts of this road are not, but seem to have the same configuration, traffic and footfall.

6. Draymans Way (USRN 12315795) This part of the road has a Purple designation (Monday to Friday 06:30-09:30 & 16:00-18:30; Saturday 10:00-16:00; Sunday 10:00-16:00) Can you please justify why this part of the road needs to be Traffic Sensitive at weekends and not just during the working week (it is not part of the main A road)? There is justification that may be considered to be Traffic Sensitive at peak times, but consideration that it should be designated Green (Monday to Friday 06:30-09:30 & 16:00-18:30) unless weekends can be justified.

7. Normandy Street (USRN 12314835) This small part of the road has a Purple designation (Monday to Friday 06:30 - 09:30 & 16:00-18:30; Saturday 10:00-16:00; Sunday 10:00-16:00) Can you please justify why this part of the road needs to be Traffic Sensitive at weekends and not just a working week. (only a small part has been classified) There is justification that this may be considered to be Traffic Sensitive at peak times, but consideration that it should be Green (Monday to Friday 06:30-09:30 & 16:00-18:30) unless weekends can be justified.

8. London Road (USRN17025825) (the Pedestrian Precinct in Waterlooville). The map indicates that this part of London Road is Traffic Sensitive - Monday to Friday 06:30-18:30; Saturday 10:00-16:00; Sunday 10:00-16:00. It states that it as 600> vehicles per hour and 8> busses per hour. This is a pedestrian precinct that has no access to vehicles unless delivery. Please clarify why this part of London Road has been classed as Lane Rental.

9. A32 from West Meon to A32 Junction. This small part of the A32 has a Purple designation (Monday to Friday 06:30 - 09:30 & 16:00-18:30; Saturday 10:00-16:00; Sunday 10:00-16:00) Can you please justify why this part of the road needs to be Traffic Sensitive at weekends and not just a working week. (only a small part of A32 has been classified) There is justification that this may be considered to be Traffic Sensitive at peak times, but consideration that it should be Green (Monday to Friday 06:30-09:30 & 16:00-18:30) unless weekends can be justified.

10. London Road (USRN 12316372) From Downwood Way to Drift Road. This part of London Road has a Blue designation (Monday to Friday 06:30-18:30; Saturday 10:00-16:00; Sunday 10:00-16:00) Can Hampshire CC please justify why this part of the road needs to be Traffic Sensitive at weekends and not just a working week. This part of London Road does not seem to justify the classification. This may be Traffic Sensitive at peak times, and consideration that it should be Green (Monday to Friday 06:30-09:30 & 16:00-18:30) unless weekends and full days can be justified.

11. West Street (USRN 14406563) Between Harper Way and Quay Street (Pedestrian Precinct). The map indicates that this part of West Street is classified as Green - Traffic Sensitive - Monday to Friday 06:30-09:30 & 16:00-18:30. Hampshire CC's map indicates that it has 8+ busses per hour. This is a pedestrian precinct, that has no access to vehicles unless delivery. Please clarify why this part of West Street has been classed as a Lane Rental area that will assist with congestion or disruption.

12. Ively Road (USRN 33100861) From A327 Roundabout to Kennels Lane Roundabout. As this part of Ively Road is not part of the A road and travels into an industrial office complex, so this does not justify the Blue Designation (Monday to Friday 06:30-18:30; Saturday 10:00-16:00; Sunday 10:00-16:00) however it may be considered Traffic sensitive at peak working time hours. Should this be a Green classification (Monday to Friday 06:30-09:30 & 16:00-18:30) for this part of Ively Road?

13. Brickhouse Hill (USRN 16709196). This has been annotated as part of Glaston Hill Road (USRN 167083858) on your map. This is either an incorrect mapping error, or you have missed the Glaston Hill Road part indicated as Traffic sensitive from your schedule. Can you confirm which is the relevant information.

Lane Rental Scheme Document

1.1.4 - "A lane rental scheme is designed to work in conjunction with a permit scheme to complement the powers provided within this scheme through a charging regime for works taking place on the most congested section of the network at peak times". SEJUG would like to ask whether Hampshire CC has considered enhancing or amending the Permit Scheme to increase charging on Traffic Sensitive Streets instead of implementing a Lane Rental Scheme (which will be an administrative burden on both Utilities and the Authority).

2.1.3 – As mentioned above, SEJUG would like to re-affirm that the Hampshire Lane Rental Scheme will not reduce the duration of Utility Streetworks that take place. It could actually have the effect of increasing the duration of works to avoid charges, which will of course contradict the very aim of a Lane Rental Scheme.

3.3.1 – ‘The Scheme applies to Specified Works that include ... works that require a permit under the Permit Scheme’. As 7.3.1 of the 2023 Co-ordination CoP slightly altered the definition of Works that must be carried out under a Permit (i.e. Specified Works), does 3.3.1 take this into account and mirror this definition?

3.4.3 – SEJUG fully supports that LR charges will not be imposed for works on the verge, footpath etc.

3.4.4 – Footway works – ‘...subject to the Scheme and charge if such works require any form of traffic control to be deployed on the carriageway’ – SEJUG suggests this should be clarified to incorporate that a charge will apply for footway works that impinge on the carriageway only when the works disrupt the flow of traffic in that section of the carriageway.

3.5.2 - “These times will be limited to when a street is designated as traffic sensitive, including weekends and Bank Holidays – except for Christmas Day and Boxing Day. The traffic sensitive times on a Bank Holiday will be the same as those for a Sunday at that location” . SEJUG would like to ask why, for example, Good Friday and Easter Sunday have not been included in this exemption (as Easter is also a major bank holiday). Can Hampshire CC please clarify?

5.1.2 - “Lane rental charges will only apply when there is either a Road Closure or a Lane Closure...”. As per 3.4.4 above SEJUG would like confirmation that Lane Rental charges will not apply if 2-way traffic flow is maintained (including works of ‘some carriageway incursion’ where flow is maintained).

5.3.2 – SEJUG would like to query why Hampshire CC are proposing to go straight to charging the maximum Lane Rental charge allowable at £2,500? Why could this not, for example be a maximum charge of £2,000, and further scales of lower charges for in line with the Kent Lane Rental Scheme? The DfT have just consulted on charging levels in their ‘Lane Rental Scheme Approval’ consultation and are asking whether they should ‘Specify in regulations or guidance that charging policies should not simply apply the maximum charge to all roads in the scheme’. Would it not make sense for Hampshire CC to adopt this before it is adopted in regs or guidance? Have Hampshire CC considered Lane Rental charges on an hourly basis, to encompass any short duration minor works that can be done in a few hours?

5.4.1 – Discounts – Will further qualification on exactly where discounts apply and how much the maximum discount will be, and in what cases, be fully explained in the future Operational Guidance (or added to the Scheme Document)?

SEJUG is concerned that the proposed Lane Rental scheme does not include any caps on major infrastructure improvements and only mentions a discount for Joint works. S27 of DfT Lane Rental Guidance document states ‘Lane rental charges should be used to incentivise work outside of peak times, they are waived for joint works, caps or discounts are put in place for major works to install and to replace apparatus so that these works are not unfairly penalised and delayed’. SEJUG believes this is required to encourage a behaviour change and Asset investment.

5.4.7 – Collaboration – A minimum of 25% is quoted, what would be the maximum, and in what circumstances would this apply? Can this be detailed in the Operational Guidance?

5.4.10 – Innovation - A minimum of 25% is quoted, what would be the maximum, and in what circumstances would this apply? Can this be detailed in the Operational Guidance?

5.5.1 – Please see SEJUG’s comments above under 5.3.2. Why are Hampshire County Council proposing to go straight to charging the maximum Lane Rental charge allowable at £2,500? It is recognised that within the SROH there are occasions where reinstatements will fail even though the SROH has been complied with, and its Performance requirements under Section 2 met. SEJUG is concerned that Lane Rental could drive non-compliance due to the limited non chargeable windows. SEJUG suggests remedial works be charged at the same level as the original works, as there are already financial processes and sanctions in place under the HAUC/DfT Inspections CoP.

7.2.3 - Surplus revenue governance – SEJUG has serious concerns about how resources will be freed up to attend another Governance Group. SEJUG members already sit the on KLRS Governance Board, the Surrey LR Board, and the WSLR Governance Board. East Sussex CC have recently gone live with Lane Rental, and Medway, Southampton CC, Portsmouth CC and Bracknell Forest are will all be going live with Lane Rental in the next year or so. SEJUG suggests a Regional Lane Rental Governance Group to encompass all Authorities in the SEHAUC Area.

8.2.2 – ‘In advance of the Scheme coming into effect and during the period of notice, the Council will operate a trial of the Scheme’. How long will the trial be? SEJUG suggest a 3-month time period where no Lane Rental charges will be levied.

Crossover works between differing Lane Rental Authorities has not been covered in the proposed Scheme document. With both Southampton CC and Portsmouth CC pursuing Lane Rental, how will Hampshire CC manage crossover works between these neighbouring Lane Rental Authorities? For example, works being carried out on a Road that encompass 2 adjacent LR Authorities and is designated Lane Rental for both Authorities. It would be unreasonable to levy 2 separate charges from both Authorities.

In the Consultation Overview Document, its clear that Hampshire CC are proposing to levy Lane Rental Charges on a Sunday on a number of streets. SEJUG does not support this proposal at all, as there should be enough opportunities to avoid LR in any scheme on any road. These opportunities should not only be out of hours due to the Environmental Health issue already flagged in the SEJUG response. SEJUG believes if Sundays are used for Lane Rental charging, this simply becomes a tax on Utility works.

Scottish and Southern Electricity Networks (Statutory Undertaker)

Please see below the Scottish and Southern Electricity Networks (SSEN) response to Hampshire County Councils (HCC) Lane Rental scheme Consultation. We have responded to the documents in the order they are presented within the Consultation. Please note that the documents presented cover repeated points of the Lane rental scheme and SSEN has responded in the order the issues are raised.

Scheme documents

Consultation Letter

HCC states the following in your consultation letter:

“In addition, in accordance with Part 2 of the Schedule of the Street Works (Registers, Notices, Directions and Designations) (England) Regulations 2007 the Council will provide notice during this consultation for their intention to make changes to the designation for a street as traffic-sensitive for those streets being proposed for lane rental”

The Code of practice for coordination section 5.4.2 states ‘Authorities should review their existing designations before the end of 2023 to check if they have any streets designated under one of these three criteria and they should assess whether a traffic-sensitive designation should still apply to those streets.

It may be that one of the remaining criteria will continue to apply, for example, the street may carry more than eight buses an hour. However, if another criterion does not apply, the designation should be removed at the earliest opportunity so that access for street and road works is not unnecessarily restricted and traffic sensitive rates are not inadvertently charged as part of permit fees’.

Section 1.1 defines the word ‘should’ ‘as the terms “should” or “should not” and “recommended” or “not recommended”, whilst not clear legislative requirements, nevertheless can have legal repercussions and therefore are expected practice. Deviation from this ought to be justified’. Can SSEN query why the Traffic Sensitive Street Review was not completed before the end of 2023 as per CoP guidelines?

SSEN are aware that you have submitted a Traffic Sensitive Street review (TSS) at the same time as this Lane Rental Consultation, however can HCC please confirm why the full traffic sensitive review was not carried out by HCC prior to the introduction of a Lane Rental Scheme consultation?

The Traffic Sensitive Street Review is required to ensure the selected streets/USRN's are appropriate. All USRN's included in a Lane Rental scheme must meet at least two of the listed statutory criteria for designating a street as Traffic Sensitive (TS). Any changes/additions to any street with regard to traffic sensitivity are required to be submitted for consultation before being amended in the gazetteer, therefore it is reasonable to request that this is completed prior to a Lane Rental Scheme consultation being submitted.

A full review, by a Utility of a TSS consultation is very time-consuming process and requires to be detailed, and thorough. Therefore, presenting both the TSS review and lane rental consultation at the same time, places a Utility under an increased challenge to meet the timelines stated for a detailed and thorough response on both consultations.

Consultation Overview Document

Within this document SSEN would like to query the following: “What are the expected benefits of a lane rental scheme?” “These benefits are realised through behavioural changes by Promoters, which would include: • work being completed outside of peak periods. • reduced length of time a work site is unnecessarily unoccupied. • work completed to specified standards first time, avoiding a return visit. • implementing measure to reopen the highway at busiest times during the work phase. • optimising operatives on site to reduce the duration of the work; and • improved planning, coordination and working methods, including collaboration with other Promoters. When considering the above stated benefits that can be received from a Lane Rental Scheme, can SSEN enquire if Fatigue Management, Environmental working restrictions and Regulatory timelines have been considered in the construction of the Consultation, as these have an impact on how SSEN as a utility can work. It is considered that the drive to achieve the above benefits of Lane Rental will impact all these issues and may cause increased risk, environmental breaches and challenges to timelines for SSEN to avoid lane rental charges.

Please confirm that HCC has ensured that the scheme is coherent with Control of Pollution Act times (8am-6pm Monday to Friday and 8am-1pm Saturday).

Please confirm that HCC has gained the environmental departments consent/agreement for all noisy works to take place during the non-lane rental times on the specified streets.

It is possible that the benefit stated of “Work completed to specified standards first time, avoiding a return visit” may be challenged, as the impetus of having to work more quickly or at times outside of lane rental hours in order to avoid charges, will impact quality of work and create more return visits.

SSEN would like to know why Lane Rental charges will apply on weekends and select bank holidays? Please provide the HCC calculations and measurements of traffic flows which justify charging lane rental on weekends.

In cases where works take place on a lane rental street but maintain normal traffic flows/lanes then SSEN consider that no charge should be applicable, even if there is some carriageway incursion. Please confirm that when works are started outside of Lane Rental time and then are plated over to restore the highway to full public use that no charge will be applicable.

The Consultation Overview quotes “The Street Works Lane Rental Evaluation published by the DfT (2015)” to detail the demonstration of the benefits of a Lane Rental Scheme using information from Transport for London, however the document does not state whether the benefits seen were from Utility based sites or HA based sites. As the HA works outnumber the Utility works, it may be inferred that the HA’s have adopted measures to avoid Lane Rental charges, but the Utilities either cannot or have not changed the ways of working. Can you provide the breakdown of work sites that have shown a benefit by workstream and Utility for transparency.

Are HHC aware that when TfL were looking to introduce lane rental, their studies acknowledged that working outside of normal hours would result in one additional death a year? It is SSENs position that any scheme which could involve additional deaths cannot and will not be considered as an acceptable risk and cannot be supported.

The Consultation Overview document states under “Lane Rental Charges”:

“A successful lane rental scheme would result in all relevant work being undertaken outside of the designated peak times, and therefore no charges applied”.

SSEN are unable to predict the number of faults/3rd party damage/loss of service etc on any of our assets. This means that SSEN do not have a choice on where these works will take place or when, especially in loss of service or fault situations. The possibility of these types of works being reduced or methods employed to avoid lane rental charges may not be possible.

Can SSEN question why you have a 2-day waiver for immediate/urgent works and not a 48hr waiver? This calculation will impact timings and gives a utility less time to complete works, when SSEN may have no control over when and where we will have to work. For example, if SSEN starts work on major power loss fault at 1800hrs on a lane rental street, (as discussed in the pre consultation forum - the day we start work is classified as Day 1 of the waiver regardless of time started) SSEN will have until 1900hrs the next day to resolve (get the power back on, fix the fault, fully reinstate) before charges are applicable, (25hrs NOT 48hrs) so this calculation seems not to be in context with the idea behind lane rental schemes.

The Consultation Overview states: “The Council will establish governance arrangements, including a Board comprising representatives from key Promoter sectors, to oversee the use of these surplus revenues in accordance with regulations and guidance.”

Has HCC considered having a joint governance board with other HA's? Due to the fact that SSEN has 29 HAs within its area of operations, there is not enough experienced resource within the company (or Sector) to place a representative on every Lane Rental Governance Board. Therefore, SSEN requests that HCC considers either a Regional Governance Board, or an offer of support to Utilities, to help provide financial assistance to provide a Governance Board member.

Cost Benefit Analysis (CBA) Document

In the Observations seen in the document, can the breakdown of HA work and Utility works be looked into to determine where the reduction in work duration and number of works has been identified? Have the Utilities involved with these Lane Rental schemes actually managed to change their working practice or has it mainly been HA works that have changed?

Can you breakdown why the scheme will cost £987,000 per year to run? This is not clearly stated within the CBA document.

It also states that the scheme is “Very High Value For Money”, indicating that a revenue will be generated far exceeding costs. Please confirm that this is intended to be a scheme to help reduce congestion, and disruption on the network and entice Utilities and HA works to be more efficient, rather than be seen as an additional revenue stream by the council.

SSEN are pleased to see that you have included within the CBA document that HCC understand that a Lane Rental Scheme has an additional financial impact to a Utility, even if we adhere to working outside of the timings stated:

“In addition to the costs of operating the lane rental scheme, it is important to recognise that Promoters will have to operate under the lane rental scheme and costs from them may include: • lane rental charges which represent a business cost to the promoter. • additional administration costs to administer lane rental scheme processes; and • costs related to changes in working practices to avoid lane rental charges, such as greater use of traffic management or working off-peak or at weekends.” However, does HCC realise that SSEN will have to fund the above by additional means, either adding it to its quotation process or raising the costs for its works. Costs incurred could ultimately be passed on to our customers. This can be construed as a “stealth tax” to get the public to fund local authorities network maintenance and cover budget shortfalls.

HCC has quoted using the following when calculating the costs a Utility will need to consider: DfT Lane Rental Impact Assessment which estimates average daily cost for all day working to be £250, and for out of hours working £350 (2017 prices). DfT Lane Rental Impact Calculator tool which provides default estimates of a peak working cost of £500 and a 40% uplift for off-peak working giving an off-peak works cost of £700 (2018 prices)

As both of these tools are over 9 years old in their calculations, SSEN ask why these were used when the Utility sector could have been consulted and provide more updated figures. HCC have initially offset this by stating that the £200 uplift in working Off peak (2018) can be calculated as £260 in current prices. However, SSEN challenge the calculation of that uplift, as it is not reflecting current costs/wages/additional resource required when working out of hours.

SSEN also wish to add that the assumption that works will be done outside of Lane Rental timings and will have shorter durations, seems a misnomer in any lane rental scheme. Working outside of normal working hours will result in a smaller window for physical activity and may involve multiple setting up and taking down of sites. This has increased risks attached, which may increase duration rather than decrease it. Also, with the manner in which we currently conduct our works, SSEN will be challenged to reduce its works to match Lane Rental constraints.

Evaluation Plan

SSEN have no major points to raise involving the Evaluation Plan.

Lane Rental Schedule

SSEN have submitted a response to the Traffic Sensitive Street Review consultation, and this should be read alongside this document to amend any required changes to the Schedule.

SSEN wish to thank HCC for adding the columns depicting whether it is the whole street or just a part of the USRN that is lane rental. However, will Street Manager be able to depict the differing parts of the USRN when entering the permit details on Street manager? How will this be determined to assist the promoters.

There are several locations that you have included within your Schedule that are part of a larger network and there is only a small section within your boundaries and that you have classified as Lane Rental. Has HCC consulted with your neighbouring HAs to match Traffic sensitive timings and designations for these locations? This is suggested to assist with consistency across boundaries and help Utilities avoid having differing Lane rental timings to adhere to, on the same stretch of Carriageway.

It can be seen by the Traffic Sensitive Review that several USRN's have been allocated a TSS designation to cover the whole USRN, when parts of the URSN do not meet TSS requirements or should be a lesser grade of Lane Rental category (E.G. - Classified as Blue - Monday to Friday 06:30-18:30; Saturday 10:00-16:00; Sunday 10:00-16:00 but should be classified as Green - Monday to Friday 06:30-09:30 & 16:00-18:30)

Several places along the indicated TSS routes have been included in the lane rental designation but are clearly residential side roads or not part of the main carriageway or pedestrian precincts. This will need to be amended on the schedule to ensure they are not classed as part of Lane Rental charges.

Lane Rental Document

There are aspects of the Lane rental document that have been covered in the above paragraphs depicting issues with the Overview/Consultation/Evaluation and Schedule document.

In Para 1.1.4 "A lane rental scheme is designed to work in conjunction with a permit scheme to complement the powers provided within this scheme through a charging regime for works taking place on the most congested section of the network at peak times". Has HCC considered enhancing or amending their already established Permit Scheme to effect the alleged benefits of charging more on a Traffic Sensitive Street instead of introducing/implementing a completely separate scheme, that involves a lot of additional administration for both HA and Promoter?

In Para 3.4.4 "Works in the footway that involve breaking up the street, or tunnelling or boring under it, will be subject to the Scheme and charge if such works require any form of traffic control to be deployed on the carriageway."

In para 3.5.2 "These times will be limited to when a street is designated as traffic sensitive, including weekends and Bank Holidays – except for Christmas Day and Boxing Day. The traffic sensitive times on a Bank Holiday will be the same as those for a Sunday at that location". SSEN has noted that Lane Rental charges will apply to streets included within the Schedule, every day including public holidays (apart from Christmas day and Boxing Day) however, Good Friday and Easter Sunday have not been included in this exemption. As Easter is also a major bank holiday, can it be established why these dates are not included in the exception by HCC?

In para 5.1.2 "Lane rental charges will only apply when there is either a Road Closure or a Lane Closure, where the term Lane Closure refers to any of the following; • any form of traffic control is deployed on the carriageway or, • any traffic management reduces the number of lanes of a carriageway which can be safely used or, • there is any impact which reduces the traffic flow capacity or operation of a junction. SSEN would like to see works on the footway which result in a traffic management type of 'some carriageway incursion' but maintain the traffic flows should not be charged or have at least a significant discount (e.g. 75%). Can SSEN request that this be considered as part of this scheme.

In para 5.3.1 “The Regulation allows for a prescribed charge, to a maximum of £2,500, which may be reduced or waived in particular cases (applied as a lane rental charge discount)”. SSEN question why HCC is charging the maximum Lane Rental charge allowable of £2,500? Could this not, for example, be a maximum charge of £2,000 (in line with the Kent Lane Rental Scheme)? The DfT have consulted on this in their ‘Lane Rental Scheme Approval’ consultation and are asking whether they should ‘Specify in regulations or guidance that charging policies should not simply apply the maximum charge to all roads in the scheme’. Going straight to £2,500 could be construed as revenue raising.

SSEN request that HCC consider Lane rental on an hourly basis, as there are works across most utilities which can (and are) completed within a couple of hours yet the charge is for a day. If there was an incentive to only be charged a lower rate for completing works in a short time period, it would encourage promoters to endeavour to meet that criteria and thus meet the thinking behind a Lane rental Scheme.

In para 5.5.1 “All works subject to a lane rental charge and for the purpose of rectifying a defective reinstatement may be subject to the maximum daily charge of £2,500”. SSEN would like to request for exceptions/waivers to certain works which are caused by 3rd party damage or incidental damage where this is not the responsibility of the Utility. SSEN consider that the charging of lane rental at full rate should only be applied to remedial works, to remedy a defect identified after the introduction of the scheme. SSEN consider that this will encourage improved first-time compliance. Any defects identified before the lane rental scheme is commenced should be based upon the location and timings of the works.

In Para 7.2.3 “To determine the appropriate use of surplus revenues, the Council will establish a Lane Rental Scheme Governance Board which will operate in accordance with any statutory guidance and will evaluate opportunities or requests for the application of these funds”. SSEN reiterate for HCC to consider having a joint governance board with other HA’s. SSEN has 29 HAs within its area of operations, and there is not enough experienced resource within the company (or Sector) to place a representative on every Lane Rental Governance Board. Therefore, SSEN again requests that HCC considers either a Regional Governance Board, or an offer of support to Utilities, to help provide financial assistance to provide a Governance Board member.

General comments

SSEN wish to remind HCC that we are unable to predict the number of faults/3rd party damage/loss of service etc on any of our assets which mean that SSEN does not have a choice on where works take place or often when, especially in loss of service or fault situations. The possibility of these type of works being reduced or worked on outside of Lane Rental timings is questionable.

SSEN would ask if HCC consulted with the environmental health department to ensure that they are content with the encouragement of noisy works taking place outside of normal hours? There is no mention of consultation with the environmental health department (EHO) within the documents, so can HCC clarify if the EHO accept noisy works outside of normal hours. Please confirm that these discussions have taken place and the EHO are happy with HCC forcing promoters to work after 8pm at night.

SSEN believe that there is requirement for the DfT and the Highways Authorities to understand how a Utility carries out its operational works. Utilities work to a government regulatory body that provides strict regulatory safety and operational guidelines and timelines for us to carry out our essential and emergency works, which may not fall in line with how a Lane Rental Scheme requires us to work.

Lane rental schemes seem to contradict this direction, by encouraging a Utility to either: a) Work outside of optimum working hours, which may impact safety and increase the risks involved. b) Increase pace to clear sites quicker (safety risk and may impact quality of work) or pay a financial penalty.

As previously stated, SSEN have noted that the HCC Lane rental scheme provides a 2 Day waiver for Immediate/Urgent works, however SSEN consider that most Utilities will find a challenge to meet that timeline. Utilities will be being penalised financially for adhering to our regulatory safety and operational timelines which may prolong some fault works. Exemptions and waivers should be more realistic in timelines for Immediate/Urgent works or provide opportunity to carry out Immediate/Urgent works in accordance with regulatory guidelines.

Please can HCC provide the calculations and measurements of traffic flows which justify charging lane rental on weekends. In the Lane Rental Guidance for English authorities, one of the incentives to encourage promoters to minimise their exposure to lane rental charges is to make greater use of evening or weekend working. Also applying a Lane rental charge at a weekend is likely to discourage promoters to change working practices rather than encourage.

SSEN asks if HCC has completed a feasibility study to ensure that electrical Immediate/Urgent works with excavation and reinstatement can be done within the timelines that lane rental is requesting? Differing sectors have differing timelines on works, assets are placed at differing depths and locations (as per regulatory guidelines) therefore will take increased time to resolve/reinstate.

This scheme does not include caps on major infrastructure improvements and only mentions a discount for joint works. Neither of which will encourage behaviour change or asset investment. This is not in keeping with DfT guidance as stated below

S27 of DfT lane rental guidance document states - Lane rental charges should be used to incentivise work outside of peak times, they are waived for joint works, caps or discounts are put in place for major works to install and to replace apparatus so that these works are not unfairly penalised and delayed.

SSEN cannot support any additional administrative burden being placed upon its operational staff/planners etc. The work to identify lane rental charges and any applicable exemptions is expected to be undertaken by HCC as part of the running of a lane rental scheme. Has HCC engaged with the Street Manager System to enable this information to be visible on the Street Manager planning and mapping facility?

How will HCC manage any crossover between differing lane rental schemes in a neighbouring HA? A utility has one piece of work to be completed and is it realistically correct to expect to receive multiple invoices from differing authorities, (running differing lane rental schemes) and paying 2 full Lane Rental Fees for that piece of work. SSEN request that HCC consider including this detail in the final Lane Rental Scheme documents.

SSEN would like HCC to consider, that it is recognised within the SROH that there are occasions where reinstatements will fail even though the specification has been followed. Which is why there is a performance requirement within Section 2 of the SROH, consequently these must be treated in the same way as the original works. By charging the highest rate possible, HCC seem to be penalising promoters for something outside of their control and will have created a financial and procedural remedy, for which there are already established processes and sanctions in place.

SSEN consider that the current permit scheme is more than sufficient in managing street and road works on HCC's network. Within the current permit scheme, your permitting officers have the powers to direct when works can take place on your most traffic sensitive areas and times. Introducing a lane rental scheme to effectively provide the same service, but at a greater cost to all promoters and its customers, does not seem appropriate when powers are already available to HCC to deal with the issues raised.

There is minimal evidence to support that lane rental reduces the potential impact of works, it may reduce the overall number of large-scale works, as planned infrastructure projects may be cancelled or delayed, as the cost (including Lane Rental Fees) will outweigh any agreed budget.

Due to the issues raised above and at the many forums on the subject, that SSEN has attended we are yet to be convinced that a lane rental scheme is anything more than a revenue generation mechanism. However, any legislative scheme (lane rental or permit) that impacts safety and operations on the Highways, needs careful consideration and attention before it is passed into legislation, as this will have far reaching impacts on Utilities and promoters.

South East Water (Statutory Undertaker)

Consultation Letter

The DfT/HAUC Co-ordination code of practice states that Traffic Sensitive designations should have been checked and assessed for validity using the criteria stated before the end of 2023. SEW would like to request confirmation of this taking place.

In addition to this, whilst SEW agree is it reasonable to request a traffic Sensitive street review prior to a Lane Rental Scheme consultation taking place, SEW believe that response to this review should be in hand and changes made before the Lane Rental consultation period starts rather than whilst it is taking place as both are time consuming and places extra pressure on the respondents to cover both documents in the time frame required. In addition to this such routes may need to be removed/changed according to the traffic sensitive response which wastes time for the Authority.

Consultation Overview

Whilst the whole document uses the Hampshire County Council logo SEW would like to raise awareness that the front cover of this document lists Hampshire City Council, which does not exist.

Pg 5 - Lane rental timings must allow promoter real opportunities to reduce or avoid exposure to charges by carrying out works in less disruptive ways . Whilst SEW agrees with this sentiment, promoters may not be subject to lane rental charges by working this way, uplift charges however often exceed lane rental charges when out of hours working is required. These charges are not recognised by Lane Rental scheme documents or this consultation.

Pg 6 - The expected benefits

SEW suggests that the word “financial incentive” is misleading and would like to ask how these incentives are recognised when the current “well run” permit scheme does not cost the same as the proposed lane rental scheme? SEW believe that permit conditions are a sufficient way to incentivise changes to the way and times planned works are carried out. To use Lane Rental charges in addition to the uplift charges undertakers are exposed to in order to work outside Traffic Sensitive times is pushing SU’s to increase customer bills and rush/avoid works on lane rental routes. Therefore there are no financial incentives or cost benefits for promoters to work this way.

In addition to this, if promoters are to implement the re-opening of the road at the busiest periods during the works phase, the duration will need to be extended over more out of hour times, usually within highly urban areas resulting in complaints from residents. Fatigue Management will also come into play in order to ensure continuity of the works. Environmental departments will also be required to agree to these works taking place during unsociable times. SEW would like to enquire as to whether Lane Rental charges will be avoided if the local EHO do not give permission in these circumstances?

Pg 7 - A lane rental scheme will also help to deliver a more protected and resilient network through the incentivised planning and undertaking of work, especially unplanned urgent and emergency works SEW believe this statement to be contradictory, unplanned/emergency works cannot be planned.

Pg 8 - SEW would like clarification on the statement related to unplanned works. Unplanned works in their nature do not start in the morning they can start at any time, this may mean that a promoter only has just over a day to complete works. SEW believe this should be 48 hours rather than 2 days to ensure promoters are able to complete works in a suitable timeframe which may include round the clock working.

SEW believe unavoidable delays should be documented within this consultation. Eg. concrete curing times. In order to ensure these are adhered to additional days would be required, this should not result in additional charges to the promoter.

Pg 9 - SEW supports the proposal of 8.7% of the total network to be covered by Lane Rental as this is in line with DfT guidance.

The Council will undertake the necessary steps to effect these traffic-designation changes well in advance of a lane rental scheme coming into effect SEW would like clarification on when this will happen.

Pg 15 - In parallel with the consultation the council will serve formal notice of their intention to make relevant changes to traffic sensitivity designations for the lane rental network as set out in Part 2 of the schedule of the Street works SEW would like to reiterate their above comments, this exercise should have been completed prior to this Lane Rental Consultation in order to be in line with DfT Guidance.

Pg16-17 - SEW is concerned that tourist/holiday traffic routes are included in the scheme. This is a clear contravention of the Traffic Sensitivity Review 2022 where such routes were removed

CBA document

SEW would like to query the data sources advised. KCC Lane Rental Scheme data covers only 10 months not 12 as stated, in addition to this the data source for Surrey Lane Rental Scheme is incorrect. Surrey Lane Rental didn’t commence until April 2021

Pg 5 - SEW believe that the CBA figures are flawed and quite possibly biased as the only impacts (both negative and positive) provided are based upon current lane rental scheme authorities data. There are no accurate figures provided to account for the extra charges incurred by promoters nor the impact of return visits due to the incentives directed by such schemes. Works are either rushed, avoided or not completed to a satisfactory standard in order to try and avoid such charges.

Pg 9 - There is no data detailing the measures used to ensure lane rental charges are avoided when works do take place and the costs incurred. These include extended hours worked, specialist machines brought in to complete reinstatements in a quicker time period (eg roadmender/hotboxes), material, personnel, Traffic Management and machinery supply all of which are charged at premium rates outside normal working hours. Residential complaints, Environmental Health applications for overnight working.

Pg 10 - SEW would like to inquire as to why data from 7-8 years ago is being used, these figures are very low against today's prices. Whilst the differential charge within the lower paragraph is higher SEW still believe these to be under estimated. Minimum wage alone has increased by over 55% since 2018.

SEW would like to advise that as Lane rental charges are seen to be avoidable charges they are therefore a business cost and such charges have to be passed onto our customers.

General

SEW are of the opinion that the HCC Lane Rental Scheme should not be introduced and that their current permit scheme whilst currently sufficient could be enhanced to improve the coordination of strategic route works.

There is no undeniable argument within the document to prove lane rental schemes reduce disruption, reduce complaints and cost less money, these issues are pushed further outwards to other parties i.e. customers, undertakers or promoters and residents. In addition to this, maintenance on already worn out assets located within proposed lane rental routes is being deferred in order to avoid lane rental charges.

Southern Water (Statutory Undertaker)

Southern Water General Comments:-

Southern Water undertake a number of essential streetworks on the Highway, such as laying new apparatus (water or sewer mains) or repairing their existing networks. Minimum dig technology on mains replacement programmes is used where possible (pipe bursting, slip lining) with open cut (excavationary works) being used only when necessary, so that disruption to customers is kept to a minimum.

The Water Industry Regulator, OFWAT requires efficient, effective, and economical delivery of 100% of all works, as well as a secure and reliable network. It is therefore not in the interest of Southern Water to carry out Street Works for any longer time than is necessary.

Due to the current state of the economy, Southern Water strongly believes that Lane Rental should not be introduced at this time (or at all), and that the existing 'well run' Hampshire CC Permit scheme enables Hampshire CC to control the timing of works by directing Southern Water to conduct works at certain times, and for set durations. Along with s74 NRSWA, these are adequate to fulfil the Network Management Duty of Hampshire CC under the Traffic Management Act. Lane Rental Schemes also make it harder for Southern Water to deliver vital infrastructure, Services, and value for money for consumers.

Southern Water believes that the Hampshire Lane Rental Scheme will not reduce the number or duration of Southern Water Streetworks that take place, as they are mainly Customer or Health & Safety driven and are of short duration with negligible disruption (i.e., cover & frame replacements, short duration works to the Water Distribution Network etc).

Southern Water agrees the proposed scheme may change the timing of works (i.e., delay them to outside of traffic sensitive times) but fears this will result in more customer complaints due to Southern Water suppliers having to work unsociable hours to avoid the charges. It may also have the effect of increasing the duration of works to avoid charges, which will of course contradict the very aim of a Lane Rental Scheme.

OFWAT also deem Lane Rental charges as an allowable cost, which means Lane Rental charges will ultimately be recharged back to Customers.

Southern Water Consultation Specific Comments:-

Southern Water fully support the SEJUG response to the Consultations.

Lane Rental Scheme (Draft Doc)

2.1.2 & 3.4.1. 'The lane rental scheme will only apply to a street that is publicly maintainable by or on behalf of the Council, which is a protected street or a traffic-sensitive street'. Southern Water would like to ask if the Traffic Sensitivity designations have been made in line with 5.4.2 of the Co-ordination CoP 2023 (backed by Regulation 16 of the 2007 noticing regulations), which states 'authorities should only make the designation during the periods when it is strictly necessary..... Designations should be reflective of the various network management needs, up to date traffic data, and be reviewed at least every three years.'?

2.1.3 – As mentioned above, the Hampshire Lane Rental Scheme will not reduce the duration of Southern Water Streetworks that take place. It could actually have the effect of increasing the duration of works to avoid charges, which will of course contradict the very aim of a Lane Rental Scheme.

3.3.1 – 'The Scheme applies to Specified Works that include ... works that require a permit under the Permit Scheme'. As 7.3.1 of the 2023 Co-ordination CoP slightly altered the definition of Works that must be carried out under a Permit (i.e. Specified Works), does 3.3.1 take this into account and mirror this definition?

3.4.3 – Southern Water supports that LR charges will not be imposed for works on the verge, footpath etc.

3.4.4 – Footway works – ‘.....subject to the Scheme and charge if such works require any form of traffic control to be deployed on the carriageway’ – should this not be clarified to incorporate that a charge will apply for footway works that impinge on the carriageway but only effect the flow of traffic in that section of the carriageway?

5.3.2 – Southern Water would like to query why Hampshire CC are proposing to go straight to charging the maximum Lane Rental charge allowable at £2,500? Why could this not, for example be a maximum charge of £2,000, and further scales of lower charges for in line with the Kent Lane Rental Scheme? The DfT have just consulted on charging levels in their ‘Lane Rental Scheme Approval’ consultation and are asking whether they should ‘Specify in regulations or guidance that charging policies should not simply apply the maximum charge to all roads in the scheme’. Would it not make sense for Hampshire CC to adopt this before it is adopted in regs or guidance?

5.4.1 – Discounts – Will further qualification on exactly where discounts apply and how much the maximum discount will be, and in what cases, be fully explained in the future Operational Guidance (or added to the Scheme Document)?

5.4.7 – Collaboration – A minimum of 25% is quoted, what would be the maximum, and in what circumstances would this apply? Can this be detailed in the Operational Guidance?

5.4.10 – Innovation - A minimum of 25% is quoted, what would be the maximum, and in what circumstances would this apply? Can this be detailed in the Operational Guidance?

5.5.1 – Again, why are Hampshire County Council proposing to go straight to charging the maximum Lane Rental charge allowable at £2,500? Please see comments under 5.3.2.

7.2.3 - Surplus revenue governance – Southern Water has serious concerns about how resources will be freed up to attend another Governance Group. Southern Water already represents the Water Sector on KLRS Governance Board, and SE Water represent the Water Sector on WSLR Governance Board. East Sussex CC will be going live with Lane Rental on 1st March 2025, which will need a Water Sector Rep to sit on the board. Southern Water suggests a Regional Lane Rental Governance Group to encompass all Authorities in the South East.

8.2.2 – ‘In advance of the Scheme coming into effect and during the period of notice, the Council will operate a trial of the Scheme’. How long will the trial be? Southern Water suggest a 3-month time period where no Lane Rental charges will be levied.

Cost Benefit Analysis

P2 – Outcomes – The behavioural change mentioned in the table won’t result in a reduction in occupation for planned or unplanned works, but it could have the effect of increasing the duration of works to avoid Lane Rental charges.

P9 - Increased cost to Promoters to avoid or mitigate for charges, per peak work moved to off-peak (2024 prices) – range depicted on the table of between £200 - £350 seems extremely low and would not encompass all of the factors below that need to be taken into account.

Southern Water suppliers have to take into account the following when working out of hours, and that there will be very little scope for avoiding these costs: Extra cost / uplift for supply chain delivery of materials at weekend (e.g. tarmac); Logistics of disposal of spoil / muckaway at weekends; Extra Management and Supervision to be employed at weekends; Extra support drivers will be required for grab lorries; Additional cost of opening suppliers at weekends; Further supplier and statutory undertaker resources required to manage incoming customer calls related to why works are being undertaken at weekends; If works cannot be completed to permanent reinstatement, then could be a cost of interim to permanent reinstatement at a later date Extra potential NRSWA Administrative staff to cover Permit / notice applications at the weekend.

P11 – ‘As the lane rental scheme operates alongside a permit scheme with shared or similar processes, the net additional administration cost for Promoters under a lane rental scheme is considered negligible and has not been quantified’. Don’t fully agree with this comment, as Permit costs are administrated by separate people in SW to administration of Lane Rental charges.

Consultation overview

P5 – ‘lane rental timings must allow Promoters real opportunities to reduce or avoid exposure to charges by carrying out works in less disruptive ways.’ Fully support this comment.

P9 – SW support Hampshire CC proposing 8.7% of the total network length to be covered by Lane Rental, as this is in line with DfT current guidance which recommends between 5-10% be used with a maximum of 10%.

P16 – ‘In parallel with this consultation the Council will serve formal notice of their intention to make relevant changes to traffic-sensitivity designations for the lane rental network as set out in Part 2 of the Schedule of the Street Works’ - Should this exercise not have been carried out pre-Lane Rental consultation (and in line with DfT Guidance)?

Lane Rental Scheme – Schedule

Southern Water fully supports SEJUG’s response with regards to the Lane Rental/ Traffic Sensitive Consultation.

Stagecoach (Passenger Transport Provider)

We broadly welcome the principle of a lane rental scheme as a mechanism to incentivise reducing the significant impact of disruption caused to passengers by roadworks. From a public transport perspective, having reliable journeys with consistent journey times is critical to encourage modal shift away from the private car and to continue to portray the use of public transport as the best choice.

Any interventions that minimise avoidable disruption to the road network have the potential to deliver significant benefits to public transport users, bus operators, and local communities.

Existing Challenges

Road closures and road works present significant challenges to our ability to provide a reliable and punctual bus service. These challenges fall into the following main categories:

- Immediate disruption to passenger journeys

- o Extended journey time for customers, in some cases customers will no longer be able to make use of the bus to complete their journey.
- o Bus stop closures & temporary bus stops cause uncertainty to customers.
- Accuracy of journey planning and real time passenger information
- o Data feeds need to be updated with accurate data to ensure that journey planning and real time tools need to be updated; data takes time to percolate through to third party systems such as Google maps, a real challenge for short notice closures.
- Internal change process
- o Driver duties are agreed with our Trade Union and are published to our drivers, any changes are subject to notice periods. Buses on our network tend to operate a mixture of routes, and roadworks on one route can cause knock delays on impacts to other services; this can be mitigated by rescheduling the buses for known roadworks; however, with short notice closures we do not have the opportunity to do this.
- Increased costs of providing the service
- o For significant closures, roadworks add additional significant additional extra bus and driver resource.

Comments on consultation

Excess Closure Periods

As mentioned above, it's critical for our ability to plan for changes and to communicate disruption to our customers that the duration of road works is known accurately in advance. Our network has recently experienced a number of occasions where road closures were advertised, however not taken up – however we had to plan and communicate as if they were. A recent closure of the A3090 at Pitt advertised 3 full weekend closures, however on some days this was only taken up for 3 hours and the road remained open outside of these times.

We note that in this consultation there does not appear to be a mechanism to disincentive such cases where roadworks are advertised but not taken up - we feel a fee for this would be appropriate.

Short Notice Roadworks

We appreciate that some road closures and road works are required in response to an emergency situation. However, we feel that there have been increasing examples of planned closures with short notice periods. This limits our ability to respond and communicate effectively with our customers and limits our ability to update data streams to ensure continuity of high-quality real-time passenger information and journey planning. We feel that a mechanism to incentivise longer notice periods, and to penalise short notice closures would add significant benefit to the scheme.

Increased Costs of public transport operation

In order to counter lengthy diversions or traffic delays, bus operators are likely to need to add extra bus and driver resource which adds significant cost; there are limited mechanisms to apply for compensation in such circumstances. We feel that revenue generated by this scheme should be allocated to offset the additional resource incurred and on other measures to encourage the use of public transport at times of road disruption - an added benefit being to reduce car usage during these times.

Limit of roads included in the scheme

We are of firm belief that all roads which are used by public bus routes should be included in this scheme. The criteria for a road to be included in the scheme on the grounds of bus route frequency would mean that a significant proportion of roads used by buses would not be included.

Hours of Operations

We note from the consultation that the scheme would operate at peak times only. The peak period as defined in the consultation documentation is from 16:00 Monday to Friday, however our data tells us that the peak period in terms of traffic congestion and customer numbers begins from 14:30; a 16:00 start would begin after school traffic has almost finished! Equally, there is no provision for the scheme to operate at weekends, which we find at certain times have equal, if not greater, journey times and patronage on our network.

We are happy to support with journey time data on this if helpful.

Winchester Safety Advisory Group (District Council)

Thank you for your consultation on the proposed Lane Rental Scheme. We have significant concerns about the scheme that is currently proposed. The cost-benefit analysis fails to assess all of the negative impacts of lane rental as required by the Government guidance because it does not address the noise impacts in any way.

For Winchester's District, the roads have been identified from a traffic perspective as daytime sensitive. If this proposal is adopted, it will push all works to routinely be scheduled overnight and this could have a very significant negative impact on the health of local communities from increased noise/ sleep disturbance, especially as the roads identified within the scheme are all highly populated with residential (noise-sensitive receptors).

We doubt that all works should be pushed entirely to night- time because there will be periods during the day/ locations when or where traffic impacts could be acceptable.

We believe that there should be a better hybrid proposal that addresses both traffic and noise impacts.

As part of the investigations, it is recommended that the County consider engaging a competent acoustic consultant to complete a noise impact assessment as part of this scheme to inform the final proposals.

List of Consultees

1310 Ltd	Department for Energy Security and Net Zero	Glide Business
Abovenet Comms	Department for Transport	Gosport Borough Council
Albion Water	DfT Road Statistics Division	Grayshott Gigabit
Aldermaston Coach Lines	Disability Rights UK	GTC Pipelines
Allpoints Fibre Networks Ltd	Disabled Persons Transport Advisory Committee	Guide Dogs For The Blind
AMK	Dorset County Council	Hants Ambulance
Hampshire County Council	Dorset Community Service	Hants Constabulary
Basingstoke Borough Council	E S Pipelines & E S Power	Hants Fire
Bluestar	East Hants District Council	Harlaxton Energy Networks
Bournemouth Christchurch and Poole Council	East Sussex County Council	Hart District Council
Bracknell Forest Council	Eastleigh BC	Harting Minibus
British Motor Cyclists' Federation	Eclipse Power Networks Ltd	Hartley Wintney Borough Council
Broughton and Mottisfont Borough Council	EE	Havant Borough Council
BRSK	Electricity Network Company Limited	HCC Emergency Planning
BSkyB Telecoms	Energy Assets Networks	Health & Safety Executive
Cadent Gas	Energy Assts pipelines	Horseman Coaches
Cellnex OT UK	Environment Agency	Hutchison 3G
City Fibre	Esso	Hyperoptic
City of London Telecomms	E-volve Solutions Ltd	Icosa Water
Coach Event Services	Fareham Borough Council	Independent Pipelines Ltd
Community First Company	Fibre & Wireless Networks	Indigo Pipelines & Power
Concept Solutions People	FibreNet	Internetty
Cornerstone Telecommunications Infrastructure Limited	First Hampshire & Dorset	Last Mile Asset Management
Could HQ Didcot Fibre Gp	Fulcrum	Last Mile Electricity
Cresta Coaches	Full Fibre	Leicester City Council
Damory	Gas Transportation Co.	London Borough of Harrow
	Gemini Travel	London Borough Of Waltham Forest
	Gigaclear	Lucketts
		Lumen Technologies Inc

Martlet	Royal Mail Property & Facilities Solutions	Veolia Water
Meon Valley Community Bus	Rushmoor Borough Council	Verizon
Morebus	Salisbury Reds	Virgin Media
MUA Gas & Elec	Secretary of State for Transport	Vodafone
National Express	Serverhouse Ltd	Wessex Internet
National Grid	SGN	Wessex Water
National Highways	Sky Telecommunications Services	West Berks Council
Neoscorp	South East Water	West Sussex County Council
Netomnia	South West Water	Whealers Travel
Network Rail	Southampton City Council	Wifinity Limited
Network Rail	Southern Water	Wiltshire Council
New Forest District Council	SSE	Winchester City Council
Newbury and District Council	SSE Telecoms	Wokingham Council
Nexfibre Networks Ltd	Stagecoach (South)	Xelabus
Nextgenaccess	Surrey County Council	Zzoomm Plc
NWP Street	Swish Fibre	
O2(UK) Ltd	Test Valley Borough Council	
OFCOM	Thames Valley	
OFGEM	Thames Water	
OFWAT	The AA	
Open Fibre Networks	The Road Haulage Association Ltd	
Openreach	Toob	
Optical Fibre Infrastructure Limited	Trooli	
Oxfordshire County Council	UK Power Distribution	
Persimmon Homes	UK Power Networks	
Portsmouth City Council	UKWIR	
Portsmouth Water	Unilink / Southern Vectis	
RAC Foundation	Unity First	
Reading Buses	Vattenfall	
RNIB (Royal Institute of Blind People)		