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Dear Ian,

Consultation on the Revised London Permit scheme for Road Works and Street Works (LoPS)

Thank you for consulting London First on the proposed permit scheme. You may know that London First is an influential business membership organisation, with the mission to make London the best city in the world in which to do business. We represent 300 of the capital's leading employers in key sectors such as financial and business services, property, transport, ICT, creative industries, hospitality and retail, collectively accounting for approximately a quarter of the capital's GDP.

One of the key issues for our members is road congestion and hence the contribution that road works make to it. We have campaigned for some time now for better coordination and execution of road works and early implementation of the permit scheme. We are delighted, therefore, that 18 London boroughs and TfL have signed up to the proposed scheme and that it may be up and running by the end of the year.

We hope that the scheme will be successful in reducing delays and congestion and that it will be equitably administered. Although supportive about the general principles of the scheme, we have some comments on the scope and management of it. We set these out below:

- We believe that the conditions such as traffic management plans, specified working hours in traffic sensitive times and places, which can be included in permits will certainly help tackle congestion. Although not necessarily subject of this consultation, we fear that the lack of buy-in from the remaining 15 highway authorities can dilute the positive impact of the permit scheme, as well as creating a dual system for the utility companies. This situation can undermine the permit system and it is important that the Mayor and the London Councils work towards a London-wide scheme.

- We do not have sufficient information on the readiness of the participating boroughs, TfL and the utility companies to embrace the new system. If the electronic notification and processing systems are not in place when the scheme is introduced, the permit scheme will obviously be weakened. In our view, this would be a significant setback for London and efforts to tackle congestion. We urge the LoPS managers to take this concern seriously and ensure that the required systems are in place before the scheme is activated, or consider initially running trials with the highway authorities equipped for the permit system.
- In addition, we believe that the lead-in time should be long enough for the new system to bed in. Two to three months seem a more reasonable period for this purpose.
- As the CBA for the permit scheme indicates that congestion due to street works and road works are equal, it is important that permits for highway works are treated on par with utility works and permit conditions are enforced equitably. It is expected that Works Task Force or Assets Task Force will be monitoring the performance of highway authorities' own works.
- We appreciate that there will be occasions when permit conditions need to be varied. It is in everybody's interest that variations, in particular those relating to the duration of works, are kept to a minimum, so that one of the tenets of the permit system, the enforcement of realistic timescales for the completion of works, is not abused. There would be exceptions of course, such as emergency works.
- Our major concern is the management of the process by the permit authorities and the utility companies. This will be a demanding regime, as all parties will have to put in better planning and monitoring systems and resources. The CBA report indicates that the additional cost of permit scheme to each local highway authority, including own works, vary from £0.5m to £1.5m pa, and almost £3m for TfL. How can we be confident that in the current economic climate these monies will be available to run the system? The participating permit authorities have to clearly demonstrate that this cost is in their business plans. Similarly the utility companies will need to find at least another £18m to comply with the permitting scheme. These are estimates at this stage but once the scheme is in operation, costs to both sides have to be monitored, and if needed, the scheme amended, to make it economically more viable.
- The introduction of the permit scheme is a good time to make better use of LondonWorks, so that it is much more than a register of works. Such a powerful and potentially unifying tool should be used for the co-ordination and monitoring of all road works actively, to avoid parallel working and conflicting activities in neighbouring boroughs. We would like to discuss this with you and TfL after the consultation.
- We understand that this will be a common permit scheme, each authority applying the common rules on their roads. Is there an intention that there will be a lead borough, even on a rotational basis, which would oversee the operation of the scheme and become the depository of comments on the scheme? This would be similar to Hammersmith and Fulham's role in the coordination of this consultation. It

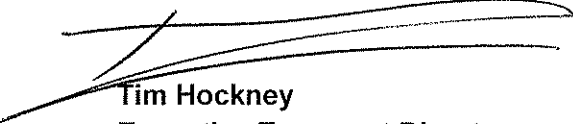
is proposed to set up a number of task forces reporting to the operational committee on the monitoring of the scheme, but we are concerned that the whole monitoring regime could become bureaucratic and unworkable. The publication of the monitoring results in each authority's Network Management Duty reports would still not bridge the gap created by the lack of a coordinating body.

- Finally, in your proposals for committees and task forces to be set up for the monitoring of LoPS, there seems to be no communication lines with external stakeholders. As a business organisation we would like to see a mechanism, on the lines of a task force, set up to collect and transmit business views on the performance of the permit scheme.

In summary, we are supportive of the permitting scheme but feel that there are a number of fundamental issues that require further attention.

We would be pleased to hear from you on these points.

Yours sincerely,



Tim Hockney
Executive Transport Director
London First