



London Borough of Lewisham

Consultation Report

Lane Rental



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London Borough of Lewisham Lane Rental Scheme.
Reducing disruption on the borough road network



London Borough Lane Rental Scheme. Reducing Disruption on the Borough Road

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Executive Summary

The London Borough of Lewisham seeks to introduce a Lane Rental Scheme on a proportion of its road network in accordance with the Street Works (Charges for Operational Occupation of the Highway) (England) Regulations 2012 (the Lane Rental Regulations) made under Section 74A of the New Roads and Street Works Act.

The Council seek to introduce a Lane Rental scheme to achieve better control of road works and street works which take place on its network, with a core objective of reducing disruption to the most sensitive parts of the network, at the most sensitive times.

The Scheme seeks to limit the amount of disruption to the road network by encouraging the undertaking of works at the least disruptive time for road users, and the early completion of works. The Council is committed to providing clean and green spaces, strong, healthy, and safe communities, more and better homes and an economy that works for everyone. Traffic congestion affects economic productivity, people's health, and the environment.

The proposal to operate a lane rental scheme supports the London Mayor's election manifesto pledge to expand lane rental across London.

Since the summer of 2023, a number of London boroughs have been working in partnerships and formed The London Borough Lane Rental Strategy Group, which consists of representatives from Transport for London, the London Boroughs of Enfield, Merton, Camden Lambeth, and the Royal Borough of Kensington and Chelsea. The primary objective of the group was to establish a pan-London framework for operating lane rental on borough roads, together with a standardised approach for defining lane rental networks, applicable charges, and the times when charges would apply should works be undertaken at peak travelling periods. The pan-London framework was produced in consultation with all London boroughs on key policy areas and was shared with utility companies and the Department for Transport for feedback. The proposed Lewisham scheme aligns with the Transport for London Lane rental scheme. Lewisham will form part of the tranche three London borough Lane Rental group, which subscribes to the pan-London approach and the set of rules that has been developed by the Lane Rental Strategy Group.

By December 2025 the Department for Transport approved all four tranche one London borough scheme applications, which sets an established precedent for other London boroughs considering Lane Rental applications.

While it has been confirmed that boroughs need to progress with individual applications and consultation, which Lewisham has done, the Scheme document remains consistent with the pan-London approach in its entirety.

Consultation

To seek the views of stakeholders, the London Borough of Lewisham undertook a 4-week period of consultation, from **Wednesday 25 February** until **Wednesday 25 March 2026**. In accordance with DfT guidance, the consultation was preceded by a traffic sensitive review relating to the proposed Lane Rental streets, with notification provided to stakeholders on **17 October 2025**. The outcome of the review was provided to respondents on **18 December** and **19 December 2025**.

We received three responses to the consultation, including one from an electricity network operator, one from a water company and one from the Greater London Authority. The following themes were raised throughout the responses received:

- The charge free period for immediate works.
- The categorisation of footways and cycle tracks.
- The use of Street Manager terminology.
- Categorisation of Major Infrastructure Works.
- The Cost Benefit Analysis.
- Waivers and exemptions.
- Waivers for collaborative works.
- The application of revenues.

We have listed all the consultation comments received, along with our responses, in section 4 of this document.

Next Steps

Having considered every comment raised by respondents to the consultation and following discussion with the members of the London Borough Lane Rental Strategy Group and Tranche three London Borough Lane Rental working group, we have decided to amend the proposals consulted on to:

- Waive charges for all collaborative work.

The responses made clear that consultees felt that collaborative works should be further incentivised by ensuring that the scheme made commitment to a full waiver for such works.

Summary of other points considered

Having considered the other themes, points and comments raised, the London Borough of Lewisham believe that:

- The Scheme provides sufficient opportunity for charges to be avoided.
- The Scheme incentivises genuine immediate emergency works to be expedited on the lane rental network.

- The London Borough Lane Scheme Operational Guidance published in March 2026 provides the clarity requested by the consultees.
- The governance of scheme funds will be in accordance with the regulations. A further benefit of the pan-London approach to lane rental is the ability to utilise the established governance group, structure and processes implemented by Transport for London. This will assist the governance group members with their availability and ensure that the experience of its members is utilised with a fair and transparent process for the management and allocation of scheme funds. We will work in partnership with TfL and other London Lane Rental authorities to explore the prospect of a pan-London Lane Rental governance committee.

In accordance with the Devolution and Community Empowerment Act we will now submit an application to implement a lane rental scheme to the Mayor of London. The Mayor of London will need to consider whether to grant our application. We will include a copy of this Consultation Report with our application. We will update our website with the outcome of the Mayor of London's consideration of our application as soon as it is announced to us. We will also write to all those individuals and organisations who replied to the consultation.

1. About the Proposals

Introduction

- 1.1. Lewisham Council is committed to keeping transport in the borough efficient and safe as outlined in the Council's [transport strategy](#). A lane rental scheme would help reduce congestion caused by roadworks, contributing to a cleaner, greener and safer borough.
- 1.2. The London Borough of Lewisham Lane Rental Scheme seeks to limit the amount of disruption to the road network by encouraging the undertaking of works at the least disruptive time for road users, and the early completion of works.
- 1.3. The Scheme is designed to limit the carrying out of works at specified locations by applying a daily charge, if a designated street is occupied by works during specified days and times. A charge will not apply if works take place outside of the specified days and times. Lane rental charges are proposed to apply at locations making up 14% of the Lewisham Road Network. Charges will apply daily and are banded depending on the sensitivity of the location to congestion. The low band is proposed to be charged at £1,000 per day, the medium band at £1,500 per day and the high band at £2,500 per day. At the widest extent charges can apply from 07:00 to 19:00. This encourages companies to undertake their works at quieter times.
- 1.4. We will use the proceeds from lane rental charges to administer the scheme, reinvest a 50 per cent portion of the surplus back into highway maintenance (if regulated), and fund a range of projects which aim to reduce the adverse effects caused by roadworks with the remaining surplus revenue generated.

2. About the Consultation

Purpose

2.1. The objectives of the consultation were:

- To give stakeholders and the public information about the proposals and how to respond.
- To understand any issues that might affect the proposal of which we were not previously aware of.
- To understand concerns and objections.

In planning our consultation, we paid regards to the latest version of the document 'Lane Rental Schemes: Guidance for English Highway Authorities.'

Who we consulted

2.2. The consultation was open to anyone who had a view they wished us to consider although we specifically invited a range of stakeholder organisations to respond.

Dates and duration

2.3. The consultation ran for 4 weeks from **Wednesday 25 February** until **Wednesday 25 March 2026**.

Methods of responding

2.4. Respondents were asked to submit their comments in writing, via post or email.

Consultation materials

2.5. The Lane Rental scheme was advertised on a dedicated Lewisham Council website: [Lewisham Council - Lewisham lane rental consultation](#) and also via emails sent out directly to stakeholders that were deemed as having an interest in the proposal. These included all statutory undertakers that currently operate in the borough. The following materials were published:

- The consultation letter
- The proposed Lewisham Lane Rental Scheme Document
- The proposed Lewisham Lane Rental Network Maps
- The proposed Schedule of Locations
- The supporting Cost Benefit Document
- The Evaluation Plan

2.6. An interactive map of the proposed Lane Rental Network was also made available on the dedicated Lane Rental website.

Meetings with Stakeholders

- 2.7. Throughout the development of the proposed Scheme, Lewisham has met with and sought the views of stakeholders, including Transport for London, other London Boroughs, London Councils, the Department for Transport and representatives of utility companies.

Analysis of consultation responses

- 2.8. All consultation responses were read and analysed in detail. Every comment and suggestion from respondents were reviewed to identify common themes.

3. About the Respondents

Who responded

- 3.1. We received three responses to the consultation, one from a gas and electricity network operator, one from a water company and one from the Greater London Authority.

The responding stakeholders were as follows:

- UK Power Networks
- Thames Water
- Greater London Authority

4. Responses to consultation comments

TABLE OF CONSULTATION COMMENTS FROM UK POWER NETWORKS

Number	Theme	Comment	Lewisham Response
1	Cost Benefit Document	Section 5.1.2 - Why has Lewisham deviated away from the DfT recommendation of a 48-hour period?	Comment noted. DfT's guidance states: In respect of genuine emergency (not immediate) works that must be carried out during the charging period to avoid significant danger to public safety or significant property damage, schemes will be expected to provide a charge-free period to enable the emergency to be dealt with and the road reopened to traffic. The scheme aligns with the established arrangements that are in place as part of the Transport for London Lane Rental Scheme, operating since 2012, which has demonstrated that 97 per cent of all emergency works undertaken on the lane rental network do not incur a charge. This justifies that the 24-hour free period drives the desired behavior, and the DfT have now approved the first tranche of London borough Lane Rental schemes that have also adopted this approach. The London Borough of Lewisham Scheme aligns with this to ensure consistency across London.
2	Cost Benefit Document	5.3 - Information required on Permit Applications	Comment noted.

3	Cost Benefit Document	5.3.2 NCT02a is not classified as a mandatory condition, therefore this should be removed from the scheme.	This provision is consistent with section 5.2 of TfL's approved Lane Rental scheme. The national conditions guidance document sets out the mandatory and non-mandatory conditions. NCT02a is not a mandatory condition within the context of the permit scheme, however, for the purpose of a Lane Rental Scheme it is an appropriate condition to be applied and therefore it will be applied. The scheme document already clarifies the conditions will be imposed rather than mandated.
4	Cost Benefit Document	Please clarify when you mention the maximum band if you are referring to £2,500? - UKPN would like to clarify that only the maximum rate of the area occupied should be charged.	The maximum band refers to the 'High Charge' in the Lewisham Lane Rental Scheme. This is set to £2,500.
5	Cost Benefit Document	UKPN believes allowances should remain within the scheme to allow for retrospective waivers on planned works. Circumstances outside the control of the promoter may occur that could provide an opportunity for a waiver. Please confirm this can be added into the scheme document? For all options of reduced charges, in essence "Waivers", can Lewisham please detail what percentage of reduction will be applied to each example? Can Lewisham please confirm that for works on the same USRN, whereby the works are undertaken at the same time and cross into another borough, that a waiver will be included in that the maximum charge	Detailed guidance on waivers and reductions was published in March 2026. Waiver requests shall be treated on a case-by-case basis and the outcome recorded to ensure draft charges are raised specific to the circumstance.

		is equivalent to the maximum charge allocated to that street.	
6	Scheme Document	Transitional arrangements for Major schemes should have an extended period of at least 3-months. This is because projects or customers may have committed already to these schemes and a period of 28 days does not incorporate the permitting timescales.	Lewisham recognises that some major schemes may already be in development at the point of scheme implementation. However, the proposed transitional period has been set to provide a clear and consistent commencement date while ensuring the scheme can begin delivering its intended network management benefits without unnecessary delay. A 28-day transition period is considered proportionate and aligns with standard implementation practice for London Lane Rental schemes, providing promoters with advance notice to review planned works and make reasonable adjustments where required.
7	TSS	Please confirm when the last traffic sensitive consultation was undertaken. Please confirm why TSS have now moved from working days to calendar days.	The evidence to support the designation of Traffic Sensitive Streets is not required as part of the consultation but can be provided to the London Mayor as part of the final Lane Rental submission if requested.
8	Cost Benefit Document	LB of Lewisham are planning for 14.0% for LR coverage. This is outside the DFT's target of 5-10%.	The algorithm applied is based upon a 15% coverage pan London, with some boroughs having a higher or lower percentage than others. Lewisham's coverage is based upon this model, less a further reduction for roads which Lewisham deemed as unsuitable, producing a finalised network extent of 14.0%. Lewisham believes the Lane Rental scheme network extent is robustly justified with data including an evaluation of the Traffic Sensitive Streets review and London Permit Scheme evaluation.

9	Cost Benefit Document	Many of the specified timings force the promoter to be working out of hours. If these are the only times Lewisham is allowing work to take place, please confirm that permits will be granted for these works and not unjustly refused? With this in mind, can Lewisham 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 Lewisham has obtained their Environmental Departments consent & agreement for all noisy works to take place during the non-lane rental times on the Specified Streets.	The Lane Rental scheme does not negate the requirement for a Section 61 Agreement under the Control of Pollution Act 1974 and responsibility will continue to rest with the works promoters.
10	Cost Benefit Document	What has Lewisham done to educate its constituent members that if they need work done on a LR route that it will cost them many thousands of pounds more in the future than it does now?	The London Borough Lane Rental scheme is designed to allow for works to be completed outside of chargeable hours, or to completed without delay where charges cannot be avoided. The calculations shown in Table 7 in 7.3 have been derived from the standard method of measurement used to calculate all other schemes. Lewisham has briefed the lead member for Environment about the implications of Lane Rental as well as the overall benefits of the scheme.
11	Cost Benefit Document	The time bands provided do not provide sufficient time for work to take place. A time band of 5 hours (low and medium) on weekdays is not sufficient to undertake any substantial work. Even worse are the	The time bands are similar to TfL's scheme, which has been in operation since 2012 and has demonstrated 83 per cent of utility works has avoided a charge.

		timings on high category roads that force promoters to work out of hours therefore the statement that it will limit noise impacts is completely opposite! Therefore, this simply confirms why this is a penalty for all parties involved.	
12	Cost Benefit Document	What are Lewisham's proposals for how the Governance Board will be managed and run?	The initial participating boroughs will utilise the existing TFL Governance Board Framework. This arrangement will be periodically reviewed. As more London boroughs join the scheme, new arrangements will be established in consultation with relevant stakeholders.

TABLE OF CONSULTATION COMMENTS FROM THAMES WATER

Number	Theme	Comment	Lewisham response
1	Scheme Document	LB Lewisham is also under a duty to follow the Lane Rental Schemes Guidance for English Highway Authorities issued by the Department for Transport on 3 April 2025 ('the Guidance'). TWUL considers, as set out below, that this guidance has not been followed and that LB Lewisham has not put forward any clear or cogent reasons why the guidance should be departed from.	We can confirm that Lewisham has developed its Lane Rental scheme in line with the most recent guidance and advice provided by Transport for London (TfL), who are currently leading on all London applications. TfL continues to work closely with the Department for Transport (DfT) and receive regular updates on the latest national guidance, including the Lane Rental Bidding Guidance issued in April 2025. Our scheme has therefore been prepared in accordance with this most up-to-date advice, with four other London boroughs receiving DfT approval for their schemes.

2	LOPs	Please provide TWUL with the evaluation reports for the operation of the permit scheme that demonstrates that the permit fees were proportionate and record the circumstances in which discounts were made available to TWUL.	All of the evaluation reports have been completed in line with regulation 16a, copies of which will be made available on the Lewisham website and submitted to the Mayor of London as part of our application.
3	Scheme Document	Please explain why your scheme does not allow for caps for major works. TWUL has a substantial programme of lengthy capital works, the viability of which are put into question through any disproportionate Lane Rental Charges.	Section 7.3.1 of the Scheme Document makes provision for charges to be reduced for Major Infrastructure Improvements, which is detailed further in the London Borough Lane Rental Scheme Operational Guidance published in March 2026.
4	Scheme Document	Please explain why, contrary to the Guidance, you propose a trial period of only 4 weeks, as opposed to the recommended 3 months.	Lewisham will comply with the DfT's guidance and provide stakeholders with a 12-weeks' notice period of our intention to commence the scheme. There is no recommended trial period stated in the national guidance. Other approved Lane Rental London boroughs have reported very little utility engagement with the trial process, which is likely to be duplicated on multiple occasions providing stakeholders with familiar trial conditions.
5	Scheme Document	The Scheme Document only states that 'consideration' will be given to reductions. It is discretionary, not definitive.	Agreed.
6	Scheme Document	The Scheme Document does not provide details of any incentives for high-quality performance, including right first-time reinstatements. For example, there are no rebates offered if reinstatements are resilient and do not need further repair within a set period of time.	Operational Guidance has been published for London Borough Lane Rental schemes. There are currently no discounts provisioned for high-quality performance, with reinstatements expected to be compliant over the course of the guarantee period.

7	Scheme Document	The Scheme Document does not address circumstances in which lane rental costs are unavoidable. TWUL's statutory undertakings involve the physical transmission of millions of gallons of clean and foul water each day, through aging infrastructure. Around 70% of TWUL's street works are reacting to a problem – for example a blocked sewer, often because of customer misuse, or a leak on a water main. These would not fall within the limited definition of 'an emergency' within the scheme, but would be works where lane rental costs would be unavoidable. A telecommunications or electricity undertaker is much more likely to be conducting planned installations for which reductions would be possible.	Comment noted. Lewisham recognises that a proportion of utility works are reactive in nature and cannot always be planned in advance. However, the Lewisham Lane Rental Scheme is intended to reduce the disruption caused by works rather than the number of works undertaken. Charges are applied based on the location and timing of works on the highway network. DfT's guidance states: In respect of genuine emergency (not immediate) works that must be carried out during the charging period to avoid significant danger to public safety or significant property damage, schemes will be expected to provide a charge-free period to enable the emergency to be dealt with and the road reopened to traffic. It is suggested the water sectors specific circumstances are addressed with those responsible for Lane Rental scheme policy.
8	Scheme Document	TWUL is concerned that a Lane Rental Charges Scheme that does not account for the reactive nature of its day to day work would mean that charges would be disproportionately borne by TWUL and ultimately its customers.	Comments noted, however the proposed Scheme represents 14.0% of the borough network where works can be adjusted as demonstrated in other existing and successful Lane Rental Schemes such as on the Transport for London road network. The other 86% of roads can be worked on as per existing practices. The London Borough Lane Rental scheme is designed to allow for works to be completed outside of chargeable hours, or completed without delay where charges cannot be avoided.

9	Scheme Document	There is no detail as to how reductions or waivers would operate and are all discretionary, in any event.	London Borough Lane Rental Scheme Operational Guidance was published in March 2026, which sets out a range of scenarios where reductions or waivers could apply.
10	Cost Benefit Document	Please demonstrate how the CBA took into account how design of the scheme, factoring in TWUL's limited capacity to reduce exposure to charges.	Lewisham followed DfT Lane Rental Guidance in full, undertaking due diligence on street selection, traffic sensitivity, and charging structures. Our cost-benefit analysis, prepared using DfT methodology, provides a proportionate assessment of the scheme's impacts. The opportunity to avoid charges is similar to TfL's scheme, which has been in operation since 2012 and has demonstrated 83 per cent of utility works has avoided a charge. The cost benefit analysis does not distinguish between specific utility sector operations.
11	TSS	During the statutory consultation period for the Traffic Sensitive Designation, TWUL requested the data and reports to support the designation, but none was forthcoming. Please provide the data and any reports showing that Geoplace guidance was adopted whilst conducting the traffic sensitive streets review.	This is not a requirement at the consultation stage but will be provided to the Mayor of London as part of the Lane Rental submission.
12	Scheme Document	Please demonstrate, through the provision of appropriate data and analysis, that only the most critical part of the street network has been targeted, again with reference to the suggested 5-10% threshold.	This is not a requirement at the consultation stage but will be provided to the Mayor of London as part of the Lane Rental submission. It should be noted the cost benefit analysis was conducted in the same way as the four other London borough schemes the DfT has already approved, three of which are above 10 per cent threshold referenced.

13	Scheme Document	Please explain why you have allowed an exemption of only 24 hours and not adopted 48 hours as recommended by the Guidance.	The scheme aligns with the established arrangements that are in place as part of the Transport for London Lane Rental Scheme, operating since 2012, which has demonstrated that 97% of all emergency works undertaken on the lane rental network do not incur a charge. This justifies that the 24-hour free period drives the desired behaviour, and the DfT have now approved the first tranche of London borough Lane Rental schemes that have also adopted this approach. The Lewisham Scheme aligns with this to ensure consistency across London.
14	General Comment	TWUL reiterates the observations made above about the reactive nature of its day to day street works and notes the overall principle that charges 'must be genuinely avoidable'.	Comment noted.
15	Cost Benefit Document	Please explain the justification for charging the maximum £2,500.	To ensure consistency with the TfL Lane Rental model and all other operational Lane Rental Schemes, we propose setting the maximum daily charge at £2,500, in line with the highest charge permitted by regulations.
16	Scheme Document	TWUL reiterates that the proposed scheme does not set out clear and transparent discounts – it only states that consideration will be given to a reduction.	Detailed guidance on waivers and reductions for London borough Lane Rental schemes was published in March 2026.
17	General Comment	The Scheme is silent as to whether reduced charges should apply when alternative arrangements are prohibited by another Local Authority Department – for example, the Environment Health department preventing nighttime works. This is particularly relevant to TWUL, as accessing its assets requires the deepest excavations.	The Lane Rental scheme does not negate the requirement for a Section 61 Agreement under the Control of Pollution Act 1974 and responsibility will continue to rest with the works promoters

		They are therefore likely to be noisier than that of other undertakers.	
18	General Comment	The proposed immediate implementation of scheme after the commencement date, with a limited 28-day transitional period, does not take this into account. Any charges that are unavoidably incurred by TWUL will inevitably reduce the funds available for environmental improvements to its network. TWUL has a set budget to undertake works in the Greater London area over the next 5 years, much of which is allocated to improve river water quality in the Thames basin. The budgeting of substantial capital projects involves detailed procurement procedures and are determined long in advance, in consultation with Ofwat.	Comment noted.
19	Cost Benefit Document	LB Lewisham has not included an essential document within the consultation pack– a full cost benefit analysis (not just a document stating one will be sent off to the DfT when making the application.	The DfT cost–benefit analysis form is not required at the consultation stage. Although it forms part of our formal application to the Mayor of London, DfT guidance confirms that the completed form does not need to be included in the public consultation materials. We have followed DfT Lane Guidance in full, undertaking due diligence on street selection, traffic sensitivity, and charging structures. Our cost–benefit analysis, prepared using DfT methodology, provides a proportionate assessment of the scheme’s impacts. This approach is consistent with other London borough consultations that have received DfT approval.

			However, a supporting cost benefit document was provided with the consultation pack.
20	General Comment	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 will be cancelled or delayed as the cost becomes prohibitive if lane rental costs are applicable. We are unable to predict the number of leaks/3rd party damage/sewer blockages etc. on any of our assets which means that we do not have a choice on where works take place or often when, especially in loss of service or burst situations – so the possibility of these type of works being reduced is questionable.	Comment noted.
21	LOPs	As per page 9 of the DfT lane rental bidding guidance (April 2025), for LB Lewisham to apply for a lane rental scheme it must be demonstrated that LB Lewisham has a well-run permit scheme. This includes the provision of all appropriate permit scheme reports. Please confirm the location of all permit scheme evaluation reports for LB Lewisham. We have been unable to locate any report on your website.	Please refer to point number 2.
22	General Comment	Thames Water believe that the current permit scheme should be more than sufficient in managing street and road works on LB Lewisham's network. Within the	Comment noted.

		current permit scheme, your permitting officers have the powers to direct when works can take place on your most sensitive areas and times. Introducing a Lane Rental scheme to effectively provide the same service but at a greater cost to any promoter and its customers does not seem appropriate when powers are already available to LB Lewisham.	
23	Scheme Document	There appears to be no mention of a governance group to be set up to monitor and evaluate the scheme as expected. Thames Water and the guidance expects that any lane rental scheme establishes joint working arrangements for deciding how surplus revenues are spent within their permit scheme document.	The initial participating boroughs will utilise the existing TFL Governance Board Framework. This arrangement will be periodically reviewed. As more London Boroughs join the scheme, new joint arrangements will be established under which both the highway authority and works promoters are actively consulted on how surplus funds are applied and demonstrate the governance arrangements that will be put in place to ensure compliance with the legislation.
24	Scheme Document	Please confirm that LB Lewisham has ensured that the scheme is coherent with Control of Pollution Act times (8am-6pm Monday to Friday and 8am-1pm Saturday).	Please refer to point 17.
25	Scheme Document	Please confirm that LB Lewisham has gained the environmental departments consent/agreement for all noisy works to take place during the non lane rental times on the specified streets.	Please refer to point 17.
26	General Comment	Has LB Lewisham completed a feasibility study to ensure that works with excavation and reinstatement can be done within the times that lane rental is not applicable?	Lewisham have not completed any feasibility studies relating to an undertaker's work methodology and practices. However, it is understood from TfL's monitoring report that ~86% of London's water sector works have managed to avoid incurring charges.

27	Scheme Document	Thames Water objects to the inclusion of footways in the scheme. Regulation 4 (5) of the regulations states that: - Charges do not apply to street works — (a) in a verge. (b) in a traffic-sensitive street, other than at a traffic-sensitive time. (c) in the footway of a traffic-sensitive street, at a traffic-sensitive time, so long as the street works do not involve breaking up the street, or tunnelling or boring under it.	Lewisham has not proposed the inclusion of footways to be designated as Lane Rental. However, Lewisham will follow all guidance in relation to updating its Lane Rental Scheme in the future.
28	General Comment	Has the selection of LB Lewisham proposed specified streets and times considered the H&S/welfare of workers as working at nighttime is more dangerous & has a significant financial impact – setting non lane rental times to be only between 10pm and 6am do not offer any practical times for works to be done. When TfL were looking into introducing lane rental, their studies acknowledged that working outside normal hours would result in one additional death a year. Thames Water believes that no death should be an acceptable risk (as per 2.1.4).	The proposed network leaves just over 85% of Lewisham's road network available to be worked on during the day subject to permit approvals. As stated earlier in this document, at the widest extent charges can apply are from 07:00 to 19:00. This encourages companies to undertake their works at quieter times. Under the Health and Safety at Work Act 1974, undertakers must carry out adequate risk assessments to identify potential hazards and implement measures to mitigate them.
29	General Comment	Has LB Lewisham given any consideration on different impacts faced by differing utility types? - the water network tends to be the deepest in the highway, whereas telco network is shallow and mainly in the footway.	Please refer to point 27.
30	Scheme Document	The lane rental scheme will apply to every day including public holidays apart from Christmas day. As Easter is also a religious	Lewisham has attempted to align with the TfL Scheme as closely as possible regarding non-chargeable days over the festive period. It is however noted that Boxing Day and

		holiday why is that not also included in the exception?	Easter bank holiday, despite the latter being a religious holiday, has increases in traffic movement in the borough, as well as other bank holidays except for Christmas day. The proposed approach aligns with other London boroughs who have received Lane Rental scheme approval.
31	Cost Benefit Document	We would like to know why LR charges will apply on weekends. Which streets will these apply to, and what is the justification for this? Please provide the calculations and data-led measurements of traffic flows which justify charging lane rental on weekends.	Lewisham do not wish to incentivise weekend working when there are other viable opportunities to work outside of peak times. This is consistent with the approach applied by TfL and Lewisham believe it will assist in encouraging works to be completed expediently.
32	Scheme Document	It is a reasonable expectation that to avoid lane rental charges an organisation may choose to prioritise routine maintenance or upgrade work in areas or streets where lane rental does not apply and the infrastructure in Lane Rental areas may be penalised as the utility will likely wait until the asset fails rather than meet the cost of maintenance due to prohibitive lane rental charges. This will result in reduced investment which could lead to more impactful emergency activities.	Lewisham does not consider that the scheme will discourage necessary maintenance or investment in infrastructure located on lane rental streets. Lane rental is intended to influence how and when works are undertaken, rather than whether essential maintenance takes place. The charging structure encourages promoters to plan works more efficiently, reduce occupation durations and consider undertaking works outside charging periods where practicable, rather than defer required activity.
33	Scheme Document	Please confirm how LB Lewisham will manage any crossover between differing lane rental schemes.	Waivers should be sought in such scenarios, and Lewisham will work with their neighbouring authorities and stakeholders in order to treat promoters fairly. This shall be included within the waiver guidance document that will be published, notwithstanding regulations only allow an approved authority to levy charges for the streets within their authority designated as Lane Rental.

34	TSS	Page 16/17 of the DfT lane rental bidding guidance (April 2025) states that the authority must have evidence to support the selection of streets (or parts of streets) for the scheme, the evidence will show that works in the highway of the selected streets cause the highest levels of disruption and require the greatest efforts to sooth the traffic flow. Please provide this evidence for the consultees to review.	The evidence to support the selection of streets is not required as part of the consultation but can be submitted to the DfT as part of the final Lane Rental submission if requested. It should be noted that the methodology used to determine the Lane rental network is consistent with other London boroughs that have received DfT approval to operate schemes.
35	General Comment	We cannot support any additional administrative burden being placed upon our operational staff/planners etc, the work to identify lane rental charges and any applicable exemptions is expected to be undertaken by LB Lewisham as part of the running of a lane rental scheme. Selecting a particular LR designation on any PAA/PA/change request indicates that works are impacting said designation, so times are irrelevant. No assumptions are necessary if the LR designation is selected then it is applicable, if it is not selected then the charges are not applicable. All collaborative works will be clearly identified in Street Manager so relevant waivers can automatically be applied by LB Lewisham.	Comment noted.
36	General Comment	This scheme does not include caps on major infrastructure improvements and only mentions a possibility of a waiver for joint works. By not offering either of these	Comment noted. Operational Guidance has been published for London Borough Lane Rental schemes, which sets out

		exemptions will not encourage behaviour change or asset investment. Consideration should be given to setting a limit of what LR charges would be applied to major schemes, possibly dependant on the scale or length of the project and the benefit that the works will bring to the community.	discounts/waivers for major infrastructure improvement works.
37	General Comment	Thames Water believes 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 immediate works. Lane rental schemes contradict these by encouraging us to either: Work outside of optimum working hours, which may impact safety and increase the risks involved, increase pace to clear sites quicker (safety risk and may impact quality of work) or pay a financial penalty. Most Lane rental schemes provide a 24hr or a 48hr waiver for immediate works, which most utilities will find a challenge to meet; thus, we are being penalised financially for adhering to our regulatory safety and operational timelines. Exemptions and waivers should be more realistic in timelines for immediate works or	Please refer to point 16.

		provide opportunity to carry out immediate works in accordance with regulatory guidelines.	
38	Cost Benefit Document	For defective reinstatement works, why are you proposing to go straight to charging the maximum Lane Rental charge allowable at £2,500?	Please refer to point 15.
39	General Comment	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. We are concerned that Lane Rental could drive non-compliance due to the limited non chargeable windows.	Lewisham recognises that reinstatement failures may occur even where works have been completed in accordance with the Specification for the Reinstatement of Openings in Highways. The scheme is not intended to encourage noncompliance or compromise quality. Promoters are expected to undertake works safely and to the required standard, and lane rental should not influence decisions that would adversely affect reinstatement performance.
40	General Comment	There should be no charge when works are carried out and full traffic flows are maintained. There should be recognition that a promoter has amended behaviour in order to minimise the disruption caused by works. Without an exemption/discount being offered for this type of action where is the encouragement to change behaviours?	All works that occur on a Lane Rental designated roads will be charged under the scheme to ensure consistency for all promoters.
41	General Comment	Strategically important and National Infrastructure capital schemes should be exempt of Lane Rental where there are clearly long-time benefits for residents, businesses, customers and the travelling public.	Operational Guidance has been published for London Borough Lane Rental schemes, which sets out discounts/waivers for major infrastructure improvement works, such as national infrastructure capital schemes. Lane Rental charges will not apply to works where traffic management does not exist.

		Works which are plated/collapsed down to minimise disruption should be incentivised with at least a 50% discount.	
42	General Comment	Works on the footway which result in a traffic management type of 'some way incursion' and maintain the traffic flows should not incur a charge at all.	Carriageway incursion is chargeable under the London Borough Lane Rental scheme framework.
43	General Comment	Works on behalf on the fire brigade to maintain/repair fire hydrants should not attract a lane rental charge as this work protects lives.	The nature of these works are generally short in duration, and should therefore be planned to be undertaken outside of Lane Rental chargeable hours.
44	General Comment	There should be a discount offered to utilities who must undertake works utilising more time-consuming construction methods instigated because of a HA request or by HA design, for example, if composite or rigid concrete curing is required.	The London Borough Lane Rental scheme Operational guidance states consideration to reduce or waive charges may be given for other circumstances not covered by the scenarios provided above.
45	General Comment	All applications and required information need to be in line with the DfT Street Manager system' and any associated API's. Anything else is over-bureaucratic and creates an unnecessary addition administrative burden on promoters.	Comment noted.
46	General Comment	There are many streets on the proposed list of streets which are not classified as traffic sensitive – or have been amended to expend the timings of existent TS times. Please provide the data that LB Lewisham has used to determine that the	The evidence to support the selection of streets is not required as part of the consultation or the traffic sensitive notification.

		timings that currently exist need to be extended.	
47	TSS	LB Lewisham have indicated that lane rental will apply to 14.1% of the network. What evidence does LB Lewisham have to justify this extent and why was this evidence not provided in the consultation pack or with the Traffic Sensitive review which was recently issued by LB Lewisham. The importance of this evidence is significant to all utilities as the proper assessment must be made to ensure that any charges we incur are justified and evidenced. All costs will eventually be paid for by your residents, our customers & UK PLC in general and we must be able to demonstrate that all charges are justified.	The algorithm applied is based upon a 15% coverage pan London, with some boroughs having a higher or lower percentage than others. Lewisham's coverage is based upon this model, less a further reduction for roads which Lewisham deemed as unsuitable, producing a finalised network extent of 14.0%. Lewisham believe the Lane Rental scheme network extent is robustly justified with data including an evaluation of the Traffic Sensitive Streets review and London Permit Scheme evaluation.
48	Scheme Document	How are the objectives going to be measured/evaluated & evidenced?	The evaluation plan is available on the dedicated Lewisham Lane Rental webpage: Lewisham - Lewisham lane rental consultation
49	Scheme Document	4.5.2 Please confirm that any 'tidal' record is visible on Street Manager as if it is not visible promoters will not be able to identify these.	Lewisham has not proposed any tidal charges as part of its scheme.
50	Scheme Document	4.6.1 Thames Water objects to the inclusion of footways in the scheme.	Please refer to point 27.
51	Scheme Document	5.1.2 Thames Water objects to the exclusion of immediate urgent works from a lane rental free period. LB Lewisham should include all immediate activities in this	Comment noted. DfT's guidance states: In respect of genuine emergency (not immediate) works that must be carried out during the

		section like all other schemes both in operation and in consultation. LB Lewisham seems to be penalising us for faults which are out of our control. Lane rental should be an hourly or half day basis as there are works across most utilities which can (and are) completed within a couple of hours yet the charge is for a full day. If there was an incentive to only be charged a lower rate for completing works in a shorter time period it would encourage promoters to endeavour to meet that criteria.	charging period to avoid significant danger to public safety or significant property damage, schemes will be expected to provide a charge-free period to enable the emergency to be dealt with and the road reopened to traffic. There is no specific timing field(s) that allow for planned works durations to be calculated on an hourly basis.
52	Scheme Document	5.2.4 Very unclear paragraph could simply say, if works encroach on all areas, then the highest charge will apply.	Comment noted.
53	Scheme Document	5.2.7. Please confirm that any 'tidal' record is visible on Street Manager as if it is not visible promoters will not be able to identify these. Many promoters have planners working in different area of the country other than the area they are planning work in – no local knowledge of area or streets, so there is a large dependence upon the information being visible in Street Manager.	Please refer to point 49 above.
54	Scheme Document	5.2.8 And a works promoter can challenge back – What has this got to do with a lane rental scheme? It is not necessary to duplicate existing rules already documented elsewhere. 5.2.9 What has this got to do with a lane rental scheme? It is not necessary to	Comment noted.

		duplicate existing rules documented elsewhere.	
55	Scheme Document	5.2.10 We object to footway being included in the table of charges. Regulations do not allow footways to be included in a lane rental scheme and therefore any references to footways need to be removed. If regulation change in the future to allow footway charging the scheme should be varied at that time.	Please refer to point 27.
56	Scheme Document	5.3.1 We cannot support any additional administrative burden being placed upon our operational staff/planners etc, the work to identify lane rental charges and any applicable exemptions is expected to be undertaken by LB Lewisham as part of the running of a lane rental scheme. 5.4.2 We cannot support any additional administrative burden being placed upon our operational staff/planners etc, the work to identify lane rental charges and applicable exemptions is expected to be undertaken by LB Lewisham as part of the administration of a lane rental scheme.	Comment noted.
57	Scheme Document	5.3.2 The mandatory conditions specified in the 'Statutory guidance for highway authorities - permit scheme national conditions' do not include NCT02a. A lane rental scheme must not conflict with existing statutory guidance or legislation.	This provision is consistent with section 5.2 of TfL's approved Lane Rental scheme. The national conditions guidance document sets out the mandatory and non-mandatory conditions. NCT02a is not a mandatory condition within the context of the permit scheme, however, for the purpose of a Lane Rental Scheme it is an appropriate condition to be applied and therefore it will be

			applied. The scheme document already clarifies the condition will be imposed rather than mandated.
58	Scheme Document	5.5.1 It is recognised within the SROH that there are occasions where reinstatements will fail even though the specification has been followed which is the reason for the performance requirements in section 2, consequently these must be treated in the same way as the original works.	Please refer to point 39.
59	Scheme Document	6.1.1 The lane rental scheme will apply to every day including public holidays apart from Christmas day. As Easter is also a religious holiday why is that not also included in the exception.	Please refer to point 30 above.
60	Scheme Document	6.1.2 Exemptions or discounts should be included for works for road purposes carried out by a promoter on behalf of the authority as these will be recharged to the authority e.g. consequential damage works.	Lane rental charges apply based on the impact of works on the highway network rather than the funding or recharge arrangements. For this reason, exemptions or discounts are not proposed for works undertaken on behalf of the authority, as the objective of the scheme is to minimise disruption irrespective of the commissioning body.
61	Scheme Document	6.1.3. <i>'The Promoter must record the appropriate charge exemption in the PA & works clear/closed notices'</i> . The works stop/start notifications can only hold a date and time in Street Manager, there is no free text field for anything else. There is nowhere on Street Manager in the permit application process to record exemptions/waivers etc. All applications and subsequent notifications must be in line with the DfT Street Manager system and any associated API's. Anything	Comment noted. The arrangements are in accordance with the approved Transport for London Lane Rental Scheme and the approved London borough schemes.

		else is over-bureaucratic and creates an unnecessary addition administrative burden on promoters. Selecting a particular LR designation on any PAA/PA indicates that works are impacting said designation, so times are irrelevant. No assumptions are necessary if the LR designation is selected then it is applicable, if it is not selected then the charges are not applicable. Has LB Lewisham considered the use of the existing Lane rental Assessment functionality in Street Manager?	
62	Scheme Document	6.2 Thames Water objects to the use of 'genuine immediate activities'. We, as utilities, must meet the requirements of NRSWA 1991 regarding burden of proof. Using this term is very subjective and could be seen as accusatory which we do not believe was LB Lewisham's intention.	Comment noted.
63	Scheme Document	6.3.1 This is tantamount to coercion. The non-payment of any invoice is a civil matter not a TMA/NRSWA matter.	Comment noted.
64	Scheme Document	7.3.1. On page 7/8 of the 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.	The scheme has been developed in accordance with Department for Transport lane rental guidance, which allows authorities discretion in how incentives, caps and discounts are applied, provided the overall objective of reducing disruption is met. The guidance does not require specific caps or discounts for major works to be included in all schemes.

		This paragraph does not reflect the DfT guidance, and we would expect LB Lewisham to include details of what level of cap or discounts would be applied to major infrastructure works.	
65	Scheme Document	7.4.1. We do not believe that this condition could not practically be met by any works promoter and as such should be reworded or removed.	Comment noted.
66	Scheme Document	7.5.1. Any unexpected costs incurred as a result of HA instructions to leave and return later should be able to recoup from the lane rental surplus fund.	Comment noted.
67	General Comment	The scheme does not seem to recognise or encourage promoters who have tried to minimise the disruption by closing in the works during TS times.	Comment noted. Works that do not require any form of traffic management during Lane Rental operational hours will not be chargeable
68	Scheme Document	9.2.1 The transition rules in other schemes introduced were quite different to this proposal, allowing any major works which had a granted PAA before the lane rental scheme was introduced to not be charged LR if works started within the first 3 months of the scheme being 'live'. This will make sure that these works will not be subject to additional charges which potentially could be unknown at the time of planning.	Comment noted.
69	Scheme Document	10.1.2. Why is this document not available as part of this consultation?	The document is not required as part of the Lane Rental Consultation. Accompanying documents will be made available subject to a decision on the Lane Rental implementation.

70	Scheme Document	10.1.5 What is this system and how will it be managed to ensure fairness? What will the process be?	As stated in the policy, Lewisham, will have a fair and open system to consider representations. The process will be similar to the TfL representation process and take into consideration all the points made by works promoters against the schemes policy and guidelines.
71	General Comment	Any dispute should go to the regional HAUC before being referred to HAUC England. Any related costs should be met by the lane rental surplus fund.	Comment noted.
72	Scheme Document	11. This sanction duplicates existing guidance/rules that are already present elsewhere. It is not needed in a lane rental scheme.	Comment noted.
73	Scheme Document	12.1.1 The cost of promoter resources required to attend governance meetings should be met from the surplus funds.	Comment noted.
74	Scheme Document	12.1.3 the document does not comply with the requirements of the Regulations in that it is very clear in the regs that surplus funds from the scheme can only be used to fund measures that seek to reduce the effects and disruption caused by Street works.	This document has been developed in accordance with DfT Lane rental guidance and current regulations.
75	Scheme Document	13.1.3. All variations to the scheme regardless of significance must be consulted upon before introducing changes.	Comment noted.
76	Scheme Document	14. Please include the periodicity of the evaluation reports. Confirm that these will be prepared and published as per the DfT LR guidance and what measures are going to included, how they will be measured,	Please refer to point 2.

		what the initial benchmarks are, etc – which would normally be included in an evaluation plan.	
77	Cost Benefit Document	This document is not a full cost benefit analysis and even quotes in section 6 that the cost benefit analysis form will be filled in and sent to the DFT when submitting the application. It is that document that we require to review and assess.	Please refer to point 19.
78	Cost Benefit Document	1.5 This section does not comply with existing legislation and mentions surplus to be spent on potholes, until amended/new legislation is in place, this document must comply with the correct regulations.	Comment noted. The scheme will comply with all regulations applicable at the time the scheme is operational.
79	Cost Benefit Document	1.9 The mentioned DFT consultation, which may or may not result in changes the current regulations – is not relevant until any changes are confirmed/introduced so LB Lewisham must comply with the existing regulations.	Comment noted.
80	Cost Benefit Document	1.12 Due to the inclusion of weekends and bank holidays in the proposed scheme, there is little scope for promoters to carry out essential works without incurring a lane rental charge. This will therefore discourage any change of practice rather than encourage changes.	Comment noted.
81	Cost Benefit Document	3.1 How has the algorithm been derived as it is hard to understand what this algorithm does. This whole section does not	The algorithm applied by Transport for London categorises streets as low, medium or high. The algorithm combines vehicle movements (PCU flows) and vehicle occupancy to

		refer to LB Lewisham at all. Sure, the scheme and this document should be specific to LB Lewisham rather than generic. There is also no mention that this algorithm only 'runs' on the TS streets in Lewisham as only streets that are correctly recorded as TS can be included in a lane rental scheme.	account for areas with reduced physical capacity and those with a high number of people travelling through them. Unplanned works are also included to incorporate the likelihood of works taking place in each location. In summary, the algorithm is sensitivity based with works on the most disruptive Lane Rental locations receiving a higher charge. It is not possible to apply lane rental to a street that does not meet the traffic sensitive criteria.
82	Cost Benefit Document	3.3 The last sentence seems to indicate that there are more buses in Lewisham than there are in central London which does not seem correct. Could the evidence of this be provided, or at least an internet link that we could go and review the details.	To clarify, the comparison is between borough roads and Transport for London's road network, which is 550km, whereas the total extent of London's bus route network is 18,523km.
83	Cost Benefit Document	3.7 what criteria is being used to determine 'higher' traffic sensitivity?	The algorithm applied by Transport for London categorises streets as low, medium or high. The algorithm combines vehicle movements (PCU flows) and vehicle occupancy to account for areas with reduced physical capacity and those with a high number of people travelling through them. Unplanned works are also included to incorporate the likelihood of works taking place in each location. In summary, the algorithm is sensitivity based with works on the most disruptive Lane Rental locations receiving a higher charge. It is not possible to apply lane rental to a street that does not meet the traffic sensitive criteria.
84	Cost Benefit Document	3.10 Thames Water objects to the inclusion of footways in the scheme.	Please refer to point 27.
85	Cost Benefit Document	3.12 If the data is not available to evidence the requirement for charges on any of the footways listed here then they must not be included in the scheme. Using	Please refer to point 27.

		estimates without any backing evidence cannot be justified. Thames Water strongly objects to these unjustifiable charges.	
86	Cost Benefit Document	4.1 which study estimated the increase in the overall amount of delay on greater London roads. Can this be provided?	This can be sourced from INRIX data.
87	Cost Benefit Document	4.3 this is a description of the approach not how the approach has been calculated. How are the charge bands (low middle high) calculated? what is the criteria to meet LB Lewisham has used to determine which band a particular location 'fits'.	Please refer to point 83.
88	Cost Benefit Document	Table after 4.5. This table must not include a column for footways as legislation does not allow charges on footways. If legislation changes to allow the inclusion of footways, the scheme can be varied to include it. Thames Water objects strongly to the inclusion of footways in any charging regime.	Please refer to point 27, although there are no legal barriers to applying footway charges if a corresponding traffic sensitive designation is proven.
89	Cost Benefit Document	4.6 This is not a data led approach as it includes estimates.	Comment noted.
90	Cost Benefit Document	5. Notwithstanding our objection to the inclusion of weekends in the scheme above, the decision to have a chargeable time on Sundays up to 7pm seems to not reflect the fact that most businesses close at 4pm so there will naturally be a lull, yet this is not accounted for in this table.	Lewisham has set charging times to reflect overall network sensitivity and congestion patterns rather than individual business opening hours.
91	Cost Benefit Document	5.4 Thames Water cannot accept that this scheme provides an increased ability to reduce exposure to charges. The inclusion	Please refer to point 31.

		of weekend and bank holidays, and the chargeable hours will lead to more works attracting charges rather than less.	
92	Cost Benefit Document	How has the cost to promoters been calculated? Thames Water has undertaken a potential liability exercise based upon all the works we undertook on the specific USRN's that have been proposed over a 12-month period and our forecast LR charges liability, excluding the significant costs of actually undertaking the works outside of normal hours (e.g. premium labour rates, material and equipment availability etc.) is more than you have quoted for the whole utility sector. Our calculation is based on the works completed on the proposed LR streets over a 12-month period from [insert to and from dates] and calculated what we would have incurred if the lane rental scheme was in place at that time. Our calculation shows that we could have incurred £2,112,500. We would like to challenge your calculation and request you provide the details of how you have reached this conclusion as this is vital in constructing a proper cost benefit analysis.	Please refer to point 19.

TABLE OF CONSULTATION COMMENTS FROM GREATER LONDON AUTHORITY

Number	Theme	Comment	Lewisham response
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1	General	The Mayor welcomes Lewisham's ambition to introduce a Lane Rental scheme and contribute towards realising the Mayor's manifesto pledge to "Drastically reduce disruption on our roads by working with TfL and councils to extend the lane rental scheme to borough roads and reduce disruption to London's road network." Lane Rental schemes are a key tool to help improve journeys, particularly at peak times, on London's most traffic sensitive streets, whilst helping to reduce the disruption to Londoners and businesses as a result of streetworks. Implementation of a Lane Rental scheme on strategic roads will encourage utilities to seek to limit the impact of their streetworks and engage in collaborative delivery. It is hoped that this will in turn lead to a reduction in disruption and congestion across the capital, a London-wide priority for the Mayor and London's boroughs. It is however essential to maintain consistency when implementing Lane Rental schemes across different highway authorities who manage London's road network. Adoption of the London Borough Lane Rental Scheme (LBLRS) - agreed by the London borough strategic working group - will therefore be critical. Standardising the	Lewisham, as part of its Sustainable Transport Strategy committed to exploring Lane Rental as an option to further incentivise improved working on its road network. Lane Rental is a proven way to reduce congestion caused by roadworks on its most sensitive routes. This aligns with the Mayor's manifesto pledge to create a pan-London Lane Rental scheme which will promote consistency in its application which is also supported by Lewisham. Recommendations around the 100% waiver for collaborative works and the integration of the ICS monitoring and evaluation tool are noted.
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		schemes will help provide clarity to industry, ensuring utilities and statutory undertakers have clear and consistent rules and regulations in place. The Mayor also encourages Lewisham to adopt the forthcoming pan-London Lane Rental Governance plan. This will ensure standardised best-practice and allow boroughs to work in tandem, thus reducing risk and maximising benefits of Lane Rental. Independent Lane Rental Governance plans risk inconsistencies across highway authorities and industry partners on the Mayor of London's London Infrastructure Group (LIG) have expressed the clear need for a uniform approach. We therefore support replicating the consistent scope, methodology, permitting and waiver system that currently operates across TfL's Lane Rental Scheme (TLRS). We endorse Lewisham's alignment with the pan-London approach and call for the inclusion of 100% waivers for collaborative working. improve collaboration, the GLA have identified two recommendations that we encourage Lewisham to adopt:	
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		1) maintaining the 100 per cent charge discount for collaborative streetworks, which is in place on the TLRs; 49 The London Borough of Lewisham Lane Rental Scheme – Consultation Report 2) integrating the GLA's Monitoring and Evaluation Tool to validate collaborative streetwork projects and track the impacts of collaborative delivery. Lastly, the Mayor of London looks forward to continuing to work with the Lewisham and other highway authorities to establish best practice to administer Lane Rental schemes and surplus funding across Greater London. Recommendations: Introducing a 100% Collaborative Streetworks Fee Waiver: Our analysis indicates that collaborative streetwork projects deployed as part of the Dig-Once Approach have saved over three years of disruption in London, increasing resident wellbeing by the equivalent of £7 million and ensuring businesses avoided over £1 million in lost revenue. Waivers have played a significant role in incentivising delivery of these benefits to London residents, and we would therefore strongly	
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		encourage Lewisham's Lane Rental scheme to replicate such conditions. The full TLRS waiver granted for collaborative streetworks on the Transport for London Road Network (TLRN) has been instrumental to fostering collaborative streetworks and reducing the number of days of disruption caused by streetworks. By waiving the full cost of Lane Rental when streetworks are delivered for collaborative delivery, the TLRS incentivises collaborative working and 50 The London Borough of Lewisham Lane Rental Scheme – Consultation Report effectively encourages utility companies to enter collaborative arrangements. Without a 100 per cent fee waiver, Lewisham risks losing out on the benefits of collaboration. The Mayor's Infrastructure Coordination Service (ICS) has deployed the Dig-Once Approach and demonstrated that cost can be one of the key barriers to collaboration. Successful collaborative streetwork projects often require increased planning and additional resources. Considering this, the ICS views a fee waiver of anything below 100% as too low, as it would likely not make a significant difference to utilities' calculations and lead to the resultant reduction in streetworks delivered	
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		collaboratively. The ICS' engagement across the industry indicates that partial waivers are insufficient to offset the additional costs utilities face in pursuing collaboration, especially in strategic locations involving mains rehabilitation programmes. Moreover, utility companies operate under stringent regulatory parameters, driven by cost and value for money considerations. In turn, utilities' mains replacement programmes are sensitive to costs, which often leads to prioritisation of less expensive repairs and improvements. Given these pressures, the ICS' experience has shown that utilities are unlikely to enter collaborative arrangements unless relevant Lane Rental costs are waived. Integrating Monitoring and Evaluation to Measure the Impact of Lane Rental for collaborative streetworks: Evaluating the performance of collaborative streetwork projects is key to developing best practice. Tracking results and capturing lessons learnt help to refine Dig-Once efforts across industry and is key to scaling and embedding collaboration as a business-as-usual approach. For this reason, we recommend requesting all statutory undertakers use the GLA's Monitoring & Evaluation (M&E) tool as part of any	
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		application for waivers based on collaborative working. The M&E tool allows users to quantify and monetise the disruption saved across several key metrics, including: • Days of disruption saved; • Value of Journey time saved to road users; • Increase in local residents' wellbeing experienced from fewer days of disruption; • Business losses avoided by local businesses; • Carbon emissions and air pollution savings. We recommend incorporating the GLA's M&E tool as part of the process when securing the collaborative working waiver. The ICS is willing to provide further information and training on the tool to Lewisham as well as support with tracking results arising from the collaborative working.	
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