

DECISION-MAKER:	CABINET
SUBJECT:	Lane Rental Scheme
DATE OF DECISION:	25th March 2025
REPORT OF:	COUNCILLOR KEOGH CABINET MEMBER FOR ENVIRONMENT & TRANSPORT

<u>CONTACT DETAILS</u>			
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STATEMENT OF CONFIDENTIALITY
N/a

BRIEF SUMMARY
<p>Formal approval is being sought to progress an application to the Department for Transport ('DfT') seeking to have a Lane Rental scheme in the city, following stakeholder consultation on the proposed scheme between 24th January 2025 – 6th March 2025. In summary, Lane Rental is a scheme introduced to help further manage the impact of works on the highway network on some of the busiest roads at the busiest times, seeking to reduce delays for residents & businesses.</p> <p>This report and its appendices explore the feasibility of having a scheme in the city and potential benefits, as well as the feedback to the consultation from interested stakeholders & residents.</p>

RECOMMENDATIONS:	
(i)	It is recommended that Southampton City Council (SCC) submit a Lane Rental Scheme application to the DfT for their review in April 2025 (tranche 1).
(ii)	Subject to the outcome of the application to the DfT, to delegate the authority to the Director of Transport & Planning, following consultation with the Cabinet Member for Environment & Transport, Executive Director of Enabling Services (s.151 Officer) and Director of Legal & Governance to take all decisions and actions necessary to implement any DfT approved scheme.

REASONS FOR REPORT RECOMMENDATIONS	
1.	The introduction of a Lane Rental scheme in the city would offer a wider benefit to the city, residents and businesses by reducing the impact of works on the highway network and support easing congestion on the city's busiest roads. Lane Rental schemes are intended to focus on congested, strategic routes that are already classed as traffic sensitive. The

	<p>Lane Rental scheme would sit alongside the existing permit scheme and would add an additional layer of management of works taking place on the network.</p>
2.	<p>All utility, developer, private and Highway Authority works on a Lane Rental Road will attract a daily charge, which will go into a fund. It can then be used to cover the cost of setting up and running the Lane Rental scheme in the first instance- i.e. a Lane Rental scheme should be self-funded.</p> <p>Any remaining surplus funds can be used for schemes or innovation that reduce congestion and most recently the DfT has announced at least 50% of surplus funds can be used for highway maintenance purposes – pothole repairs or resurfacing. DfT have made an interim update to guidance on this. The amendment to the 2012 regulations that will implement this decision will be made later in 2025. On this basis there is an expectation of further DfT guidance on how surplus funds are allocated must be fully documented and reported on, so cannot be treated as another source of general-purpose revenue.</p>
3.	<p>The implementation of a Lane Rental scheme would allow the Council to charge any works promoter carrying out any registerable works in the street for the time those works occupy the highway, in a bid to reduce the amount of time traffic is disrupted whilst works are being carried out. It is anticipated a Lane Rental scheme would incentivise the completion of works in an efficient and expeditious manner, thereby reducing the disruption from the works on the network.</p>
4.	<p>In order to implement a Lane Rental scheme in the city, a detailed application must be submitted to the DfT for their approval and for the legal order to be made.</p> <p>In October 2024, the DfT announced that they would be accepting applications twice a year as follows and so on.</p> <ul style="list-style-type: none"> • Tranche 1: all bids sent to the DfT between now and 1 April 2025 will be assessed as a group between May-July 2025 • Tranche 2: any bids sent by 1 October 2025 will be assessed as a group between November 2025-January 2026 <p>An application submission as part of Tranche 1 applications in April would allow for the DfT to assess the application in 2025. The Lane Rental scheme forms part of the Parking & Traffic Management Transformation Programme, with potential savings being aligned with the roll out of a scheme. Details of the Transformation savings targets can be found under Financial Implications below.</p>
5.	<p>Significant work has been undertaken with a consultant to analyse a variety of data sets (traffic data, permit data, congestion data, bus route data) to understand the type of works, durations, timing of works as well as traffic data, including flows and congestion hotspots. Subsequent analysis has then allowed for modelling works to be undertaken to create an initial draft network for Lane Rental to be applicable to, as well as potential timings for that to be applicable as well. Outputs have been reviewed and refined further as part of an iterative process to refine the network extents and the applicable timings. It is worth noting, there were considerably more roads identified from the initial outputs than we were able to include in the final draft. The finalised draft network and analysis has then been used to which form part of the consultation to stakeholders and the public, ahead of the application to the DfT.</p>
6.	<p>The proposed Lane Rental network covers some of the key city centre routes and bus interchanges, it is hoped the proposed scheme can help improve journey times for more sustainable modes of transport such as bus patronage, cyclists.</p>

7.	Lane Rental would be applicable to any SCC or Highway works carried out on the proposed network.
8	The application for Lane Rental would be scrutinised by the DfT and the decision whether to approve can only be given by the DfT following their application review.
ALTERNATIVE OPTIONS CONSIDERED AND REJECTED	
9	<p>Do nothing: Non progression of Lane Rental scheme.</p> <ul style="list-style-type: none"> • Data analysis and Cost Benefit Analysis clearly show there is both a need in terms of the delays felt across the city's roads and a benefit to seeking to improve this for the wider public. • Adverse public perception of congestion and road works – a key issue within the city.
10	<p>Further consideration: Delayed submission of application to the DfT</p> <ul style="list-style-type: none"> • Further review of the network and submission in October 2025 (tranche 2). • Project has moved at pace to try and meet the tranche one deadline for DfT approval. • Realistically in terms of the proposed Lane Rental network it is not recommended to reduce this and dilute the potential effect it could have on the network.
DETAIL (Including consultation carried out)	
11	<ul style="list-style-type: none"> • See Appendix 1 report detailing feasibility study of having a Lane Rental scheme operational in the city. • See Appendix 2 report on Cost Benefit Analysis (CBA) of Lane Rental Scheme in the city. • See Members Room Document 1 outlining the Consultation responses and documents. • See Members Room Document 2 further reading & weblinks to other Authorities with a live Lane Rental scheme. • See Members Room Document 3 - ESIA
12	<p>Statistics: In 2023 over 12,000 works were undertaken across Southampton, which resulted in a combined occupation of the highway of over 42,000 days (115 years). This means on average a work started every 45 minutes in Southampton. Of these works, 62% were on the carriageway of which 70% have a direct impact to traffic flow.</p> <p>Analysis of the congestion across Southampton using the DfT's published data shows that Southampton's network experiences levels of congestion exceeding 100 seconds per vehicle per mile (spvpm) on locally managed A roads. This is more than double the national average of 44 spvpm.</p> <p>Further details on analysis can be found in Appendices 1 & 2 which look at the feasibility of the scheme and the wider benefits to society.</p>
13	<p>Lane Rental Network Proposal: 19.4% of the network has been identified to form part of the proposed Lane Rental network, with the vast majority making up our A Roads/ Principal Roads and some of the key City Centre routes. These equate to 109 streets and 114.5km of the 591 km of the overall network.</p> <p>This is a higher percentage than the 5-10% network of some of the neighbouring County Council authorities and recommended by the DfT. As one of the first unitary authorities, our application will be backed up with the data analysis undertaken to demonstrate why the network has been selected, following significant data analysis. The Council will be amongst the first unitary authorities to apply, so there is a risk the higher percentage</p>

	<p>network we are seeking could be rejected if the DfT continue to work on the basis of other larger County Council schemes they have previously approved.</p> <p>It is worth noting that the data analysis highlighted significantly more roads for inclusion in the scheme. It is acknowledged that it would not be realistic to apply Lane Rental to all the busier routes in the city, as it would become untenable for not only utility works but also for our own highway works to take place without charge.</p> <p>Various iterations and reviews to reduce the extent of the network have been undertaken to reduce it to its current size. Reducing it significantly more would dilute its efficacy and main purpose; it would also become unfeasible to run the scheme with the set up and ongoing running costs anticipated if it reduced considerably.</p> <p>Should the application to have Lane Rental be successful, it will continue to be a live project so will likely evolve over time as part of the scheme evaluation process, however it is worth noting any changes (or revocation) would need to be at the approval of the DfT before the Order could be revised and another made or rescinded entirely.</p> <p>A map & schedule of locations can be found in Appendix 4 and can also be found in the Feasibility Study in Appendix 1.</p>
14	<p>Consultation:</p> <p>Appendix 3 contains full details of the responses received as part of the 6-week consultation which ran from the 24th January 2025 to the 6th March 2025. It also tabulates the Council's responses to those comments, concerns and make any clarifications where possible and includes graphics of the response types. At closure of the consultation there had been 116 online responses and detailed responses submitted by email as well, totalling 170 overall comments received by the Council for the proposed scheme.</p> <p>A summary of some of the key themes raised are as follows from the general public:</p> <ul style="list-style-type: none"> • Overnight disruptions • Negative impact on local businesses • Positive Feedback • Cost Implications to Suppliers/Businesses • Cost Implications to Residents • Querying who the scheme applies to • General Comments & Suggestions • Misinterpretation of scheme • Current co-ordination of works • Quality of work • Consideration to cyclists <p>Utility specific comments:</p> <ul style="list-style-type: none"> • Traffic Sensitivity Review • Percentage of network – higher than DfT's previous approvals • Footway works – impacting carriageway and incurring a charge • Calculation of chargeable days after the 2nd day • Why maximum charges are being sought • Collaboration discounts queried • Attendance from utility reps at any surplus funding boards- staffing time, costs etc • Feedback on consultation- when will that happen? • How improvements are documented by other Lane Rental authorities and whether it is split between internal works or those of utilities. • Concerns over timings

	<ul style="list-style-type: none"> • Discounts offered <p>Workshops for interested stakeholders and utility companies were run on the 3rd March and 4th March 2025 to give people the opportunity to ask any questions and for any comments & questions on the scheme to be made. The utility session was well attended and many of the questions were more operational in nature, as well as comments already raised in the SEJUG, SSE, BT Openreach and Southern Water responses. Appendix 3 covers some of the keys themes in more detail.</p>
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RESOURCE IMPLICATIONS

Capital/Revenue

15	See Appendix 2 Cost Benefit Analysis (CBA) for headline figures for estimated set up and running costs, indicative income per year.
16	Any potential surplus charges are indicative and subject to DfT guidance on how they can be allocated. Details of these are listed in Appendix 1 but a summary is listed for ease on page 7 below.
17	Potential increase in scheme costs for any SCC works (Highways, Street Lighting, Trees, City Services)
18	<p>Whilst there are some clear positives in terms of surplus funding being potentially used for re-investing in highway related projects, it is hoped that through behavioural changes in how works are planned and executed, that congestion in the city can be minimised and as such Lane Rental income would also reflect that over time. Outline figures have been incrementally reduced to reflect this scenario.</p> <p>With that in mind, there are no guarantees on the level of likely funds generated. Analysis has been over a 3 years of works data, which has seen significant investment in both the Roads Programme and Transport & TCF works, both of which would have contributed to congestion in the short term and generation of significant Lane Rental fees, so this needs to be taken into account when looking at the analysis and the figures generated by the initial outputs (see Appendix 1, page 24).</p> <p>The figures should be taken as high-level indicative figures only and are likely to be subject to change. It is also worth noting, they have been calculated on the basis of the 19.4% network attracting charges. If the size of the network were to reduce significantly, there would be a knock-on effect on charge levels.</p> <p>A Lane Rental scheme can charge all works promoters a rental fee for occupation of the highway (up to £2,500 / day, including weekends and bank holidays). <u>The fee is applicable to all works promoters, including the Council's own works.</u></p> <p>Fees are set as a maximum by the DfT and can be set by the local authority in line with their analysis of how the scheme would run. Analysis has determined, we would seek to charge £2,500 for a road closure and £1,500 for a road closure/temporary signal.</p> <p>SCC Projects: Capital</p> <p>The finalised budget for the Roads Programme budget for 2025/26 was confirmed as £4.75m for Highways, Transport (including LEVI) £13.85m and Streetlighting £2.58M.</p> <p>Given the last few years of elevated funding particularly for Transport works, such as Transforming Cities Fund (TCF) projects this needs to be taken into account as part of</p>

the analysis undertaken, it should be noted this is unlikely to be at a similar level in future years and therefore would directly impact any incoming Lane Rental funds as well as additional funds needed to pay Lane Rental fees for any Highway Authority works.

The calculations within the Cost Benefit Analysis (CBA) and the Feasibility Study in Appendix 2 & 1 are more refined and should be considered as a more realistic reflection of possible scheme costs. There are a series of graphs in Appendix 1, pages 23-25 detailing potential income from a scheme.

The implications of having a Lane Rental scheme on our own Highways Authority works is not insignificant, particularly for major works (see Appendix 1) which is evident in the high-level analysis completed to date. As such this will need to be considered and catered for within the project costs upfront, particularly with any long duration works.

Whilst figures are by no means insignificant, in line with other Local Authorities, we are anticipating offering discounts for particular types of works (i.e. Major works, collaborative working) and some types of works will non chargeable, which would mean the below figures would be reduced depending on the works.

Whilst this would be mitigated to some extent by the potential discount offered to particular work types, it is nevertheless a cost that needs to be included within the scheme upfront.

It is not possible at this stage to predict likely forward costs for internal works, these will depend on the type of works, duration, location etc for that financial year. From the analysis undertaken of previous years' works, a summary was created to show the split across the work types between 2021 – 2023, with major schemes picking up the bulk of charges.

Use of surplus funds: Capital/Revenue

As mentioned above, the Lane Rental scheme should be self-funding in its operation and administration, with the remaining funds going into a ring-fenced budget to be used in accordance with DfT guidance. As the DfT announced at the end of 2024, at least 50% of surplus funds can be used for highway maintenance. Further guidance on this aspect will be release by the DfT, later in 2025.

With regard to the remaining surplus funds, participating organisations can then bid for funding from this budget to fund works designed to minimise traffic disruption. We are required to report on how funding has been shared, so there is an expectation from the DfT that these are not just Local Authority initiatives and all proposals are considered. As such a stakeholder committee, made up of representatives from works promoters (utility companies and the Council) must be set up to oversee the management of the Lane Rental scheme funds and annual accounts must be published to show transparency of how any surplus funds are allocated. There are examples of how other Local Authorities or Transport for London ('TfL') have funding available to projects available online. TfL in particular allocate funds to a broad variety of projects.

Funds can either be used for either capital or revenue projects.

For example:

- Innovation in disruption-saving techniques

- Installing pipe 'subways' to make accessing apparatus easier
- Improvement of apparatus records
- Measures to reduce noise, hazards or disruption from works
- Mitigation measures for major works projects.
- Highway capacity improvement or congestion reducing schemes including upgrading and improving signalled junctions etc.

SCC proposed Lane Rental Charges & potential discount levels

Road Closure (per day)	£2,500 per day
Lane Closure/ Temporary Traffic Signals (per day)	£1,500 per day
First two days of Immediate work (100%)	
Major infrastructure work (50%)	
Long duration with high charge (50%)	
Work with collaboration (75%)	
Work under 6 hours (75%)	
Work with NCT2a (75%)	
Work not impacting carriageway traffic flow (100%)	

As mentioned above, a Lane Rental scheme would run alongside the existing permit scheme and the requirements of NRSWA Section 74, regarding overrunning works. Accordingly works on a route that forms part of the Lane Rental scheme will still need to pay permit fees (albeit reduced), penalties arising from non-compliances and any overrun charges in addition to the Lane Rental fee. The DfT also announced in December 2024 that S74 fees would be doubled and also would be applicable to weekend working.

Surplus funds- other authorities.

Any surplus funds generated by the Lane Rental Scheme are heavily ringfenced by DfT guidance on how they can be allocated and not as general revenue. These are how other local authorities/TfL Lane Rental Scheme income streams & innovation allocations. In light of the DfT announcement on the use of at least 50% for highway maintenance, these may shift in due course. **See Appendix 4 for links to other Local Authority reports on how funding has been allocated to projects.**

Year	Transformation savings target	Estimated running costs	Estimated Income (Future years reduced by 20% each year)	Estimated surplus funds	Estimated 50% of funds for highway maintenance purposes
2024/25	£0	Nil	Nil	Nil	Nil
2025/26	£25,000	£260,000	£315,800 (Part year)	£55,800	£28,000
2026/27	£75,000	£275,000	£758,000	£483,000	£275,000
2027/28	£100,000	£290,000	£606,400	£316,400	£158,200

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Table 1 – estimated potential Lane Rental Scheme income & Transformation savings targets

Historic works used to determine behavioural changes for the quantification of scheme benefits were also used to estimate the income from lane rental charges. For each work, a charge was estimated using the work location, traffic control and duration (with associated work timings).

Similar behavioural changes were applied to the initial estimated lane rental charges, also considering observations on the proportion of work with charge in those Authorities operating lane rental schemes. This allowed further adjustment to identify works and days where lane rental charges would be avoided or discounted. Using this analysis, a potential income from charges was estimated at £758,000 per year.

If the scheme were to be reviewed, approved, subject to trial and formal notice, it could go live in November 2025, so it would be subject to 5 months of charges, so the income projection has been adjusted to reflect that partial year in 2025/26.

It is likely we would anticipate seeing a drop in chargeable works as the scheme potentially drives behavioural changes in how works are programmed and undertaken, the above figures are indicative due to the variable nature of works and should be treated as such. 20% decrease on an annual basis has been applied to the 'Estimated Income' in Table 1 above.

Transformation Project – savings targets

The Lane Rental project sits within the Parking and Traffic Management Transformation Programme. Savings are listed in Table 1.

Lane Rental income is revenue income and as such can be used to fund either revenue or capital expenditure in line with any DfT guidance. Built into the Parking and Traffic Management Transformation Programme are revenue saving targets associated with the implementation of Lane Rental.

These savings will be realised by applying some of the surplus generated to fund revenue expenditure that is currently funded from general fund budget allocations. The application of the funding needs to meet the relevant criteria for the appropriate use of the Lane Rental surplus and therefore it is anticipated that the savings will be achieved primarily through part funding revenue highways maintenance costs through the Highways Service Partnership (HSP) such as pothole repairs. There are other possible options around the City Watch contract and potential monitoring of works through CCTV, along with potentially funding relevant staffing time.

Operational costs & Consultancy costs:

Operational Costs:

3 FTE additional staff and some alterations to existing permitting team staffing are expected to be needed to cover the extra tasks involved, including financial management, works coordination, monitoring and regulation, scheme management and representation on the stakeholders' committee/board for managing funds. It is anticipated these

	<p>amendments would be in the region of £190,000, plus set up costs of around £75,000 on an annual basis, an uplift has been added for running costs for staffing, systems etc.</p> <p>A minor allowance for internal SCC staff would also need to be made as well, especially with the set-up of and running of the committee. We are anticipating the committee would be run alongside Hampshire County Council and Portsmouth City Council as neighbouring authorities. With the current exploration of devolution of Hampshire & Solent in the coming years, this is likely to change to reflect any emerging new structure of the authorities, but this cannot be confirmed at this time.</p> <p>Additional time and costs in staff may be needed to develop initiatives to minimise disruption, thereby reducing Lane Rental charges, these would need to be borne by the scheme. The funding of Lane Rental scheme staff will be wholly self-funded by the scheme.</p> <p>Consultancy Costs:</p> <p>Consultancy costs have been £34,000 to date and have been funded from existing resources. Subject to the DfT application review, there would be additional costs as part of set up and running of the scheme, these could be funded by the surplus funds generated by the Lane Rental scheme.</p> <p>Cost Benefit Analysis (CBA)</p> <p>As part of the application and consultation of the proposed scheme, a CBA (Appendix 2) has been prepared to understand the wider benefit of the scheme. This also includes an estimation of the potential realistic income of £758,000 annually. As outlined in the Feasibility Report, estimated income could range from £1m to £2m from the analysis undertaken on historic works. Figures should be treated as indicative, due to the variable nature of works, such as a behavioural change, type of works – i.e. emergency works that result in longer term works, slippage of major works and budget availability.</p> <p>The analysis looks at the longer-term project over a 10-year period for the scheme and the potential benefit. The summary analysis suggests a Lane Rental scheme in the city, would provide a benefit to cost ratio (BCR) rating of Very High Value for Money. See Appendix 2 for full details.</p>
<u>Property/Other</u>	
19	Not applicable
LEGAL IMPLICATIONS	
<u>Statutory power to undertake proposals in the report:</u>	
20	<p>Primary legislation for running a Lane Rental scheme comes from Section 74A of the New Roads and Street Works Act 1991 (NRSWA). The relevant regulations are the Street Works (Charges for Occupation of the Highway) (England) Regulations 2012.</p> <p>If the application is successful, the legal order required to run the Lane Rental scheme will be produced by the Secretary of State.</p>

Other Legal Implications:

21 The Lane Rental scheme proposal has been undertaken having regard to the requirements of the Equality Act 2010, in particular s149, the Public Sector Equality Duty. A copy of the Equality and Safety Impact Assessment form in Appendix 5

RISK MANAGEMENT IMPLICATIONS

22 DfT rejects the application and requests a much smaller network – this would dilute the impact the scheme would have in reality and potentially would make having a scheme unfeasible in terms of running costs. The most recent update from the DfT (February 2025) has been *‘The DfT expects lane rental to cover between 5% and 10% of an authority’s network where it is being operated by an individual authority, or an individual authority within a joint scheme (so 5% to 10% each for each authority within a joint scheme). This is 5%-10% of the total length of streets that are maintainable at public expense in an authority’s area. To note, this range will vary for each scheme and should not be seen as either a minimum or a maximum target.’*

23 Subject to DfT approval, the scheme may not see the predicted level of income, figures are indicative and likely subject to variation.

24 The impact of the scheme does not ease congestion to the levels expected. The DfT would expect to see an annual report on the monitoring of the scheme, covering a broad number of aspects such as the tracking of the number of works, duration and timings of those works and impact on the carriageway. Appendix 4a is an example of the Surrey CC report and it explores the impact having a scheme has on network behaviours and the knock effect of having a live scheme, such as less works taking place, collaborative working and reduced durations. As works can often vary from one year to another, there are a number of factors for consideration in how that improvement could be seen.

25 DfT guidance due later in 2025 on how the 50% of surplus funds can be used – this may impact how future years of surplus funding can be used by SCC.

26 Environmental Health Implications: Potential disruption for residents, a Lane Rental scheme is likely to generate additional out-of-hours works and night works as works promoters strive to avoid or reduce Lane Rental charges. This could potentially see an increase in noise complaints to the Environmental Health team. Additional liaison will be essential to monitor how this works in reality.

27 Solent and Hampshire area move towards Devolution Priority Programme (DPP) and the impact on any Lane Rental scheme, unknown at this stage.

POLICY FRAMEWORK IMPLICATIONS

28 **Green City Plan 2030** – This project will support the below aim.

- Reducing emissions across the city by easing congestion and standing traffic.

29 **Connected Southampton Transport Strategy.**
Lane Rental will support various aspects outlined in the strategy cornerstones, such as:

- Improving public transport connectivity and priority into Southampton,
- Maintaining reliable and efficient access to the Port, Airport, Economic Drivers & City Centre
- A Successful Southampton – using transport improvements to support the

	<p>sustainable economic growth of Southampton by preparing, investing and maximising how already congested transport system operates, so it becomes connected, innovative, and resilient, providing connections to where people want to go enabling people and goods to get around easily.</p> <ul style="list-style-type: none"> • A System for Everyone - making Southampton an attractive and liveable place to improve the people's quality of life, so that everyone is safe, and has inclusive access to transport regardless of their circumstances. • A Better Way to Travel - supporting people in changing the way they move around the city, by widening their travel choices so they can get around actively and healthily and travel moves towards becoming 'zero emission'.
30	<p>Clean Air Strategy (2019-2025)</p> <p>Lane Rental would help support the Council's commitment to improving air quality in the city by reducing congestion.</p> <ul style="list-style-type: none"> • Reducing emissions and air pollution now will have lifelong, lasting benefits for the city's population, remove barriers to further economic development and make the city a more attractive place to work, live and visit. Improvements in air quality can deliver ongoing improvements in public health and wellbeing.
31	<p>Adapt grow thrive Transformation programme</p> <ul style="list-style-type: none"> • Implementation of the project could contribute towards budget savings needing to be achieved by the Council

KEY DECISION?	Yes
WARDS/COMMUNITIES AFFECTED:	ALL
<u>SUPPORTING DOCUMENTATION</u>	
Appendices	
1.	Feasibility Study Report
2.	Cost Benefit Analysis report
Documents In Members' Rooms	
1.	Consultation responses – Summary of
2.	Further reading & weblinks
3.	ESIA
Equality Impact Assessment	
Do the implications/subject of the report require an Equality and Safety Impact Assessment (ESIA) to be carried out.	Yes
Data Protection Impact Assessment	
Do the implications/subject of the report require a Data Protection Impact Assessment (DPIA) to be carried out.	No
Other Background Documents	
Other Background documents available for inspection at:	

Title of Background Paper(s)	Relevant Paragraph of the Access to Information Procedure Rules / Schedule 12A allowing document to be Exempt/Confidential (if applicable)	
1.		
2.		