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12 March 2009

NJUG response to Olympic Road Network consultation

As Chief Executive, I am writing on behalf of the National Joint Utilities Group (NJUG) in response to the Department for Transport's consultation on the Olympic Road Network (ORN). We are a trade association and industry group and are committed to supporting Government, the Olympic Delivery Authority and Transport for London in delivering a successful 2012 Olympic and Paralympic Games.

NJUG was formed in 1977 and is recognised as the only UK industry association representing utilities on street works issues. Our focus is on promoting: safety; the prevention of damage to underground assets; quality and sustainability of street works; sharing of best practice; self regulation; and a two-way working relationship with Government, local authorities, and other key stakeholders to minimise disruption.

NJUG's current members are Energy Networks Association (representing electricity and gas), Water UK (representing all water and wastewater companies), National Grid, BT, Virgin Media and THUS, a Cable and Wireless Business. Our associate members are Clancy Docwra, Skanska McNicholas, Balfour Beatty, Morrison, Morgan Est, NACAP, PJ Keary, First Intervention, Carillion, Enterprise and Laing O'Rourke. Including members through trade associations, NJUG represents thirty-eight utility companies.

Our members represent utilities in discussions with Government and other key stakeholders to seek to ensure that any legislative or regulatory proposals are fair, workable and do not affect the safe provision of our essential services or place unnecessary burdens on utilities or their customers.

NJUG has a record of working in partnership with Government and welcomes this opportunity to respond to such an important consultation. Our members have already been actively supporting the Olympic Delivery Authority (ODA) and Transport for London (TfL) on the Clearway 2012 project which is looking to co-ordinate utility and highway works to minimise disruption on the ORN network wherever possible, and so we welcome this opportunity to officially respond to the consultation. We are pleased to see the commitment of the Olympic Delivery Authority to "work with all those concerned to ensure that the temporary traffic management measures that may be needed on parts of the ORN are proportionate and achieve our objective." In particular, NJUG supports the commitment of the ODA to work closely with interested stakeholders on the detailed traffic management measures to be discussed at Stage 2 and we look forward to continuing to play a constructive part in those discussions. Early sight of, and clarity on the detail of both the route itself and necessary traffic management works, will enable NJUG and its members to play a full part in the co-ordinating of all necessary works, thereby minimising disruption on the ORN and roads surrounding it. Lessons learnt from NJUG's existing Advance Planning Pilots in London and elsewhere in the UK will be helpful in ensuring a focused and flexible approach by all.

Please find our response below, the content of which has been gathered from our membership through consultation. If you have any queries in regard to our response, please do not hesitate to get in contact.

Yours sincerely,

Richard W.

Richard Wakelen
CEO
National Joint Utilities Group Ltd

CC Richard Buckley, DfT
Nick Morris, TfL
Alison Clark, TfL

Question 1

The Government believes that the roads proposed as the Olympic Route Network (see maps at Annex D and list at Annex E) are the most appropriate roads to meet the set of four requirements, (ORN-Core, ORN-Venues, ORN-Alternative routes and ORN-Preferred training venues) as described on pages 17 and 18 of the consultation document.

Looking at the roads selected for each of the four categories of ORN, do you believe that any of the roads should not be included in the ORN? What are your reasons? To enable consistent analysis of responses, when referring to individual roads please make sure you use the unique reference number, road number, road name and from/to details as listed in Annex E.

NJUG does not have a view on the appropriateness of the ORN itself and it is for our member companies to comment on any concerns regarding the impact of the designated routes on their networks. We welcome sight of the proposed ORN and look forward to confirmation of the definitive list of streets post-consultation. Utilities are investing millions of pounds to ensure that London and indeed the rest of the UK has secure, reliable and safe essential services. Early clarity around the exact streets to be included in the ORN is vital if utilities are to be able to play their full part in co-ordinating planned works and assisting, wherever possible, in achieving a voluntary 'embargo' of planned works in the run-up to the Games. Any changes to programmes of works for gas, electricity and water will need to be agreed with the economic, safety and environmental regulators and initial joint discussions have already taken place, however we recommend that TfL and the ODA continue the dialogue with the regulators, and would be happy to support / attend such meetings to achieve early resolution of key issues. Equally, given utilities' statutory obligations and the length of time it takes to plan major works and procure the necessary materials, NJUG and its members will want to work with TfL and the ODA to identify all planned works, including major asset replacement works and any connections activity, in order to include them within an overall programme of works and minimise works during the run-up to the Games.

Finally, NJUG and its members are committed to working with ODA, TfL and London Boroughs to make the Olympics and Paralympics a success, building on the existing Advance Planning pilots in London and elsewhere in the UK. Large volumes of works are required between now and 2012 - utilities' agreed asset replacement programmes, large numbers of connection works associated with the urban regeneration of the east of London, Olympic site and associated works, TfL and London borough traffic management related works, as well as thousands of diversionary works associated with Crossrail, other major transport and urban regeneration developments. If collectively, we are to deliver this very significant volume of works to ensure that London / the UK is in the best possible position to deliver a successful 2012 Games, then there will need to be strong communication, co-ordination and co-operation and greater flexibility amongst all parties.

Question 2

If you believe that any of the roads selected should not be included, which roads do you believe would be more appropriate to meet the relevant requirement(s)? What are your reasons? To enable consistent analysis of responses, when referring to individual roads please make sure you state the road number, road name and from/to details.

Not applicable, see answer to Q1.

Question 3

The Olympic Delivery Authority will work with Transport for London and other key stakeholders to develop the detailed traffic management measures that will be used on certain parts of the ORN, to ensure the smooth flow of both Games Family and other traffic. Once the proposed measures have been identified, the Olympic Delivery

Authority will discuss the measures with those directly affected and other stakeholders who have an interest in the ORN.

Would you like to be contacted by the Olympic Delivery Authority or its ORN delivery partners in the future to discuss the detailed measures? If yes, please indicate your particular interests in the ORN and how you would like to be contacted.

Yes, NJUG would like to be contacted by the ODA/ORN delivery partners to discuss the detailed measures. We can be contacted via the address given in this response. As above, early sight of the detail of proposed traffic management plans will maximise the opportunity to co-ordinate all works, thereby minimising any resulting disruption, and the risk of utility works having to be undertaken after traffic management activities.

Question 4

A draft Impact Assessment for the Order designating the Olympic Route Network is at Annex F of the consultation document.

Do you have any comments on the section of the draft Impact Assessment describing the possible effects of the ORN?

NJUG has no specific comments on this section, but see answer to Q5.

Question 5

Do you have any other comments on the draft Impact Assessment?

The draft Impact Assessment refers to the selection of 'option b', but the options are listed as i,ii,iii and iv. We assume that it is option ii that has been selected, but would welcome confirmation. (Similarly, option iii makes a reference to Option 2, which we assume is option ii and Option iv makes a reference to Option 3, which we assume is Option iii.)

There has been no attempt to quantify the cost of the measures proposed. This is unsatisfactory as it suggests that there is no cost involved, whereas there are significant costs in terms of planning and implementation which should be set against the presumed benefits of operating an ORN. Also the section describing possible effects of the ORN predicts that 20% of journeys will be affected by the ORN. This one example represents a significant cost against which should be estimated the effectiveness of the proposed mitigation measures.

Utilities are incentivised to operate efficiently, with programmes of work agreed to deliver specific safety, environmental and reliability benefits. As above, whilst we are committed to working with ODA and TfL to minimise the impact of utility works on the ORN, changes to the programmes of works agreed with industry regulators may result in additional costs, which have not been quantified or referenced in the draft Impact Assessment, and so early detailed engagement with the utility regulators is advised.

Question 6

Are there any other significant considerations you believe need to be taken into account with regard to the ORN? If so, what are they?

The dynamic, day to day, needs of London's businesses must be fully taken into account.

The regulatory, commercial and safety constraints under which utilities operate must be understood and the ODA must obtain economic, safety and environmental regulator sign-on to any changes in priorities, with any additional costs funded.

We would also like to stress the importance of good communications with the public to explain, in advance, the requirements around the ORN, which must be undertaken by the ODA. This is essential, particularly as not all utility customers can be expected to understand the priority being given to the 'Olympic project'. Clearway 2012 has established a Communications Group to explore ways of communicating with the public to seek to ensure that customers along the route provide early notification of any anticipated new services, or upgrading of existing services, in order that this can be factored in to works on the ORN, However, despite best endeavours by all, changes of ownership or use may well result in requests for connection continuing up to, and even during the Games. Leadership by the ODA, supported by TfL, London Boroughs and utilities to agree and communicate a programme of works and the reasons for them is the best way to limit the risk of unplanned works.

As above, the interaction with other planned works, particularly the volume of traffic associated with the construction of the Olympic site itself, as well as other large projects such as Crossrail, Thames Gateway etc needs to be factored in.

Additionally, NJUG would suggest that all ORNs must be included on the NSG as soon as the Statutory Instrument is signed, so as to give the greatest opportunity to highlight the fact that a potential street to be worked on is now covered by the ODA requirements.