

London Councils' Transport & Environment Committee

Thursday 13 June 2019

Supplementary Agenda

2:30pm in the Conference Suite, London Councils, 59½ Southwark Street, London SE1 0AL

Labour Group: Meeting Room 4 at 1.30pm

Conservative Group: Meeting Room 1 at 1.30pm

Liberal Democrat Group: Meeting Room 8 at 1.30pm

Contact Officer: Alan Edwards **Tel:** 020 7934 9911
Email: Alan.e@londoncouncils.gov.uk

Supplementary Agenda Papers		
-	Revised agenda that replaces the previous agenda	
5	Membership of London Councils' TEC for 2019/20	
7	Revised Nominations to Outside Bodies 2019/20 (replaces previous report)	
14	Dockless Bike Scheme Londonwide Draft Byelaw	
17	Local Implementation Plan funding formula review – Addendum table	
18	Safe Speeds Review for London Update	
19	Direct Vision Standard for Heavy Goods Vehicles	
21	Royal Borough of Greenwich CCTV Enforcement Approval	

London Councils' Transport and Environment Committee

Annual General Meeting

Thursday 13 June 2019

2.30pm in the Conference Suite, London Councils, 59½ Southwark Street, London, SE1 0AL

Labour Group: Meeting Room 4 at 1.30pm (1st Floor)

Conservative Group: Meeting Room 1 at 1.30pm (1st Floor)

Liberal Democrat Group: Meeting Room 8 at 1.30pm (4th Floor)

Contact Officer: Alan Edwards

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Part One: AGM Items	
1	Apologies for Absence and Announcement of Deputies
2	Declarations of Interests*
3	Election of Chair
4	Election of Vice Chairs (To elect three vice chairs of the Committee for the Municipal Year 2019/20)
5	Membership of London Councils' Transport & Environment Committee 2019/20
6	Appointment of the TEC Executive Sub Committee for 2019/20
7	TEC Nominations to Outside Bodies for 2019/20
8	TEC AGM Minutes of 15 June 2018 (for noting – previously agreed)
9	Constitutional Matters

10	Papers for London Councils' Committee Meetings	
Part Two: Items of Business		
11	TEC Priorities for 2019/20	
12	Chair's Report	
13	Re-appointment of Environment & Traffic Adjudicators	
14	Dockless Bike Scheme Londonwide Draft Byelaw	
15	Flooding Investment in London	
16	New London Borough of Wandsworth Byelaws – Setting Penalty Levels	
17	Local Implementation Plans (LIPs) Funding Formula Review	
18	Safe Speeds Review for London - Update	
19	Direct Vision Standard for Heavy Goods Vehicles	
20	Freedom Pass Progress Report	
21	Royal Borough of Greenwich CCTV Enforcement Approval	
22	Dates of TEC and TEC Executive Sub Committee Meeting Dates for 2019/20	
23	Item Issued under the TEC Urgency Procedure: Safe Speeds for London Steering Group	
24	Minutes of the TEC Main Meeting held on 21 March 2019 (for agreeing)	
Part Three: Exclusion of the Press & Public (Exempt) TEC will be invited by the Chair to agree to the removal of the press and public since the following items of business are closed to the public pursuant to Part 5 and Schedule 12A of the Local Government Act 1972 (as amended): Paragraph 3 – Information relating to the financial and business affairs of any particular person (including the authority holding that information), it being considered that the public interest in maintaining the exemption outweighs the public interest in disclosing it.		
E1	Exempt Minutes from the TEC Main Meeting held on 21 March 2019	
E2	Taxicard Contract Update	

Declarations of Interest

* If you are present at a meeting of London Councils' or any of its associated joint committees or their sub-committees and you have a disclosable pecuniary interest* relating to any business that is or will be considered at the meeting you must not:

- participate in any discussion of the business at the meeting, or if you become aware of your disclosable pecuniary interest during the meeting, participate further in any discussion of the business, or
- participate in any vote taken on the matter at the meeting.

These prohibitions apply to any form of participation, including speaking as a member of the public.

It is a matter for each member to decide whether they should leave the room while an item that they have an interest in is being discussed. In arriving at a decision as to whether to leave the room they may wish to have regard to their home authority's code of conduct and/or the Seven (Nolan) Principles of Public Life.

*as defined by the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012

If you have any queries regarding this agenda or are unable to attend this meeting, please contact:

Alan Edwards

Governance Manager

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London Councils' Transport and Environment Committee

Membership of London Councils' TEC 2019/20

Item No: 05

Report by:	Alan Edwards	Job title:	Governance Manager
Date:	13 June 2019		
Contact Officer:	Alan Edwards		
Telephone:	020 7934 9911	Email:	Alan.e@londoncouncils.gov.uk

Summary: This report sets out the latest details of the Committee's Membership for 2019/20. All 32 borough nominations, the City of London and Transport for London have now been confirmed. It was agreed that the TEC membership would be reported at the AGM.

Recommendation: The Committee is recommended:

- to note the membership of London Councils' TEC for 2019/20.

Borough Representation for the Municipal Year 2019/20

Barking & Dagenham	Main Rep: Cllr Syed Ghani Deputy: Cllr Cameron Geddes
Barnet	Main Rep: Cllr Dean Cohen Deputies: Cllr Peter Zinkin Cllr Alan Schneiderman Cllr Geof Cooke Cllr Laithe Jajeh
Bexley	Main Rep: Cllr Peter Craske Deputies: Cllr Alex Sawyer Cllr Melvin Seymour
Brent	<i>Main Rep: Cllr Krupa Sheth</i> Deputies: Cllr Shama Tatler Cllr Krupesh Hirani Cllr Tom Miller Cllr Amer Agha
Bromley	Main Rep: Cllr William Huntington-Thresher Deputies: Cllr Will Rowlands Cllr Will Harmer Cllr Kieran Terry Cllr Colin Hitchens
Camden	Main Rep: Cllr Adam Harrison Deputies: Cllr Danny Beales Cllr Meric Apak Cllr Richard Olszewski
City of London Corporation	<i>Main Rep: Alastair Moss</i> Deputies: Cllr Christopher Haywood Cllr Jeremy Simons Cllr Keith Bottomley
Croydon	Main Rep: Cllr Stuart King Deputies: Cllr Paul Scott
Ealing	Main Rep: Cllr Julian Bell Deputies: None Given

Enfield	<i>Main Rep: Cllr Guney Dogan</i> Deputies: Cllr Ian Barnes Cllr Chris Bond
Greenwich	Main Rep: Cllr Denise Scott-McDonald Deputies: Cllr Sizwe James Cllr Gary Parker
Hackney	<i>Main Rep: Cllr Jon Burke</i> Deputies: Cllr Guy Nicholson
Hammersmith & Fulham	Main Rep: Cllr Wesley Harcourt Deputy: Cllr David Morton
Haringey	Main Rep: Cllr Kirsten Hearn Deputies: Cllr Seema Chandwani Cllr Matthew White
Harrow	Main Rep: Cllr Varsha Parma Deputies: Cllr Jerry Miles Cllr Chloe Smith
Havering	Main Rep: Cllr Osman Dervish Deputies: Cllr Jason Frost Cllr Viddy Persaud Cllr Robert Benham Cllr Roger Ramsey
Hillingdon	Main Rep: Cllr Keith Burrows Deputies: None Given
Hounslow	Main Rep: Cllr Hanif Khan Deputies: Cllr Guy Lambert Cllr Candice Atterton Cllr Samia Chaudhary
Islington	Main Rep: Cllr Claudia Webbe Deputies: Cllr Roulin Khondoker Cllr Phil Graham

	Cllr Tricia Clarke
Kensington & Chelsea	<i>Main Rep: Cllr Johnny Thalassites</i> Deputies: Cllr Cem Kemahli Cllr Malcolm Spalding
Kingston	Main Rep: Cllr Hilary Gander Deputies: Cllr Liz Green Cllr Malcolm Self Cllr Alison Holt Cllr Tim Cobbett
Lambeth	Main Rep: Cllr Claire Holland Deputies: Cllr Nigel Haselden
Lewisham	Main Rep: Cllr Brenda Dacres Deputies: Cllr Sophie McGeevor
Merton	Main Rep: Cllr Martin Whelton Deputies: Cllr Kelly Braund
Newham	Main Rep: <i>Zulfiqar Ali</i> Deputies: <i>James Asser</i> <i>Mas Patel</i>
Redbridge	Main Rep: Cllr John Howard Deputies: Cllr Sheila Bain Cllr Kam Rai Cllr Jas Athwal Cllr Linda Huggett
Richmond	Main Rep: Cllr Alexander Ehmann Deputies: Martin Elengorn
Southwark	Main Rep: Cllr Richard Livingstone Deputies: Cllr Johnson Situ
Sutton	Main Rep: Cllr Manuel Abellan Deputies: Cllr Ben Andrew Cllr Hanna Zuchowska
Tower Hamlets	Main Rep: Cllr David Edgar

	Deputies: Cllr Rachel Blake Cllr Dan Tomlinson
Waltham Forest	Main Rep: Cllr Clyde Loakes Deputies: Cllr Naheed Asghar Cllr Grace Williams
Wandsworth	Main Rep: Cllr Richard Field Deputies: Cllr Paul Ellis Cllr Guy Humphries
Westminster	Main Rep: Cllr Tim Mitchell Deputies: Cllr Richard Elcho
Transport for London	Main Rep: Alex Williams Deputy: Heather Preen

Red *italics* indicates a new lead TEC representative.

Legal Implications for London Councils

1. There are no legal implications for London Councils.

Equalities Implications for London Councils

2. There are no specific equalities implications for London Councils.

Financial Implications for London Councils

3. There are no specific financial implications to London Councils.

Background Papers

None.

London Councils' Transport and Environment Committee

Nominations to Outside Bodies 2019/20

Item No: 07

Report by: Alan Edwards

Job title: Governance Manager

Date: 13 June 2019

Contact Officer: Alan Edwards

Telephone: 020 7934 9911

Email: Alan.e@londoncouncils.gov.uk

Summary:

This report seeks the Committee's nominations to various outside bodies which relate to the work of the Committee for 2019/20.

All nominations to outside bodies are made by the London Councils' Leaders Committee which has delegated this function to an Appointments Panel comprising of the Executive Officers. The Appointments Panel further delegated the task to the Chief Executive of London Councils, within agreed guidelines including consultation with the chair of the relevant London Councils member body, in this case the Chairman of London Councils' Transport & Environment Committee. The list of approved nominations will then go before London Councils Executive Officers sitting as the Appointments Panel for ratification.

Recommendations

The Committee is asked to agree names to be passed on to the Chief Executive of London Councils, for appointment to outside bodies.

1. Member Level Appointments to Outside Bodies

There are several outside bodies which have member-level representation from London Councils. All nominations to outside bodies are made by the London Councils Leaders' Committee which has delegated this function to an Appointments Panel comprising the Executive Officers of London Councils. The Appointments Panel further delegated the task to the Chief Executive of London Councils, within agreed guidelines including consultation with the chair of the relevant London Councils member body, in this case the Chair of London Councils' TEC. The list of approved nominations will then go before London Councils' Executive Officers, sitting as the Appointments Panel for ratification. This report seeks the guidance of London Councils' TEC in agreeing which names are to be passed on to the Chief Executive for appointment to the bodies listed below.

2. Bodies Seeking Nominations

The following bodies have sought member nominations from London Councils in the field of transport and the environment:

(a) **Heathrow Airport Consultative Committee (HACC)**

The HACC is a statutory "watchdog" for Heathrow Airport which reviews all matters of interest to stakeholders in London relating to Heathrow Airport, including surface access, employment and safety and operational issues. Meetings are held at Heathrow every two months. London Councils is asked to make one nomination per year, plus one deputy.

The TEC member for 2018/19 was Councillor Steve Curran (LB Hounslow). Vacancy for Deputy will need to be filled for 2019/20 (Conservative).

The HACC have requested that TEC select a representative from a borough that is not in the general vicinity of Heathrow Airport, for 2019/20, as these boroughs are already represented on the HACC in their own right.

(b) **Thames Regional Flood & Coastal Committee (Thames RFCC)**

The Thames Regional Flood & Coastal Committee (Thames RFCC) was established by the Environment Agency (EA) under the Flood and Water Management Act 2010. It brings together members appointed by Lead Local Flood Authorities (LLFAs) and independent members with relevant experience to ensure there are coherent plans for identifying and managing flood risks, to ensure investment is value for money and efficient, and provide links between the EA and LLFAs

Borough membership of the Committee (7 borough members) is made through London Councils' TEC. Nominations are made on a yearly basis, and deputies for each region are required. The Thames RFCC meets quarterly. The 7 areas are listed below.

Group	Boroughs	Rationale and characteristics
West	Hillingdon, Hounslow, Ealing, Brent, Harrow, Barnet (Conservative)	Virtually all of the Brent, Crane and Pinn catchments are contained within these boroughs
South West	Richmond upon Thames, Kingston upon Thames, Sutton, Merton, Wandsworth, Croydon	All of the Hogsmill, Beverley Brook, Wandle and Graveney catchments are contained within these boroughs

	<i>(Party to be confirmed at the TEC meeting)</i>	
South East	Bromley, Lewisham, Greenwich, Bexley <i>(Labour)</i>	Virtually all of the Ravensbourne catchment is within these boroughs
North East	Havering, Barking and Dagenham, Redbridge <i>(Labour)</i>	These boroughs comprise the parts of the Roding, Beam and Ingrebourne catchments that flow through London
Central North	Hammersmith and Fulham, Kensington and Chelsea, City of Westminster, City, Camden, Islington <i>(Party to be confirmed at the TEC meeting)</i>	Most of the risks within these boroughs are from surface water flooding (or from Thames tidal flooding managed by the Environment Agency).
Central South	Lambeth, Southwark <i>(Labour)</i>	Most of the risks within these boroughs are from surface water flooding (or from Thames tidal flooding managed by the Environment Agency).
North	Hackney, Tower Hamlets, Haringey, Enfield, Waltham Forest, Newham <i>(Labour)</i>	The River Lee and its tributaries are largely within these boroughs

The representatives to the Thames RFCC for last year (2018/19) for each of the seven groups are listed below:

- North West: Cllr Peter Zinkin – LB Barnet (Conservative)
- South West: Cllr Martin Elengorn – LB Richmond (Liberal Democrat)
- South East: Cllr Denise Scott-McDonald – LB Greenwich (Labour)
- North East: Cllr Syed Ghani – LB Barking & Dagenham (Labour)
- Central North: Cllr Wesley Harecourt – LB Hammersmith & Fulham (Labour)
- Central South: Cllr Richard Livingstone - LB Southwark (Labour), and
- North: Cllr Daniel Anderson – LB Enfield (Labour)

Nominations were now being sought for the Thames RFCC for 2019/20

(c) The London Sustainable Development Commission (LSDC)

The LSDC works to develop a coherent approach to sustainable development throughout London, not only to improve the quality of life of Londoners today and for generations to come but also to reduce London's footprint on the rest of the UK and the world. Nomination is sought to ensure the views of London boroughs are represented on the Commission and the work they are undertaking, including the setting of performance indicators. Meetings take place every quarter and nominations are made on an annual basis

Councillor Claudia Webbe (LB Islington) was the TEC representative on the LSDC for 2018/19. Members are asked to nominate a new Labour TEC representative on the LSDC for 2019/20, or to re-appoint Councillor Webbe.

(d) Urban Design London (UDL)

The UDL aims to help practitioners create and maintain well-designed, good quality places. It does this through events, training, networking and online advice. Nominations take place on an annual basis. The UDL meets 3 to 4 times per year.

Daniel Moylan and Councillor Nigel Haselden (LB Lambeth) were previously nominated to this body in 2018/19 and would like to be reappointed. Nominations to the UDL to be reported at the TEC AGM meeting.

(e) London City Airport Consultative Committee (LCACC)

The London City Airport Consultative Committee (LCACC) was set up by London City Airport in 1986 as a consultative body whose membership represents users of the airport, local authorities in whose area the airport is situated or whose area is in the neighbourhood of the airport and other organisations representing local communities. Its primary function is to serve as an organised forum in which the Airport can inform its stakeholders of current issues and seek their feedback. It meets four times a year.

The membership includes representatives from the boroughs most directly affected by the Airport's operations namely Newham (three members as required by the Airport's S106 planning agreement), Tower Hamlets, Greenwich, Bexley and Barking and Dagenham. Changes by National Air Traffic Services to flight paths in the Terminal Control North area mean that residents of other boroughs are also affected by the Airport's operations, particularly those in Waltham Forest, Redbridge and Havering. In January 2010, the LCACC invited London Councils to nominate a representative from one of these boroughs to represent all three of them on the Committee. The LCACC meets four times a year and nominations are on an annual basis.

The TEC member for 2018/19 was Councillor John Howard (LB Redbridge), for a one-year period. The Committee may wish to nominate the TEC member from LB Havering, who's turn it is to represent TEC at the LCACC for 2019/20.

(f) London Waste & Recycling Board (LWARB)

The Greater London Authority (GLA) Act 2007 provided the legal framework for the establishment of a statutory Board to facilitate waste management across London – the London Waste and Recycling Board (LWARB). The objective of the Board is to promote and encourage the production of less waste, an increase in the proportion of waste that is re-used or recycled, and the use of methods which are more beneficial to the environment.

Appointments to the Board are for 4 years (renewable once) running from 12th August 2016 to 11th August 2020. The London Councils' appointments to the Board from 2016 to 2020 are:

Councillor Feryal Demirci (LB Hackney)
Councillor Bassam Mahfouz (LB Ealing)
Councillor Ian Wingfield (LB Southwark)
Councillor Guy Senior (LB Wandsworth)
Barbara Anderson (Independent)
Melville Haggard (Independent)

No new nominations are needed to LWARB until 11 August 2020.

(g) London Cycling Campaign (LCC) Policy Forum

On the request of TEC, the LCC policy Forum has included a representative from TEC since September 2012.

Members of this Forum are voted in, which is why the TEC representative is a non-voting member. The Policy Forum meets quarterly and reviews and develops LCC's policy positions and priority issues. Nominations are on an annual basis

Councillor Feryal Demirci (LB Hackney) was the TEC representative for 2018/19. Councillor Demirci is no longer the TEC member for LB Hackney so another Labour nomination will now be required

(h) The Thames & London Waterways Forum

Two existing groups, the Mayor's River Concordat and London Waterways Commission, were merged in May 2017 to centralize all river transport and waterways discussions, and bring all key stakeholders together in one forum.

The new group supports the relevant goals set out in the Mayor's Transport Strategy, London Plan and London Environment Strategy, as well as the Port of London Authority's Thames Vision, which the Mayor supports.

Councillor Denise Scott-McDonald (RB Greenwich), Councillor Nick Draper (LB Merton) and Peter Craske (LB Bexley) were the previous representatives for TEC in 2018/19. There was also one vacant Labour position on the Forum. The Committee is now asked to nominate two Labour members to the Forum and one Conservative member for 2019/20

(i) London Fuel Poverty Partnership

In May 2018 the Mayor established the London Fuel Poverty Partnership to deliver his Fuel Poverty Action Plan. The partnership brings together stakeholders from sectors including local government, social housing, landlords, tenants, health, social care, academic, charities, energy suppliers and the energy efficiency industry. The group aims to not only assist the Mayor in delivering fuel poverty support but also works across support services to identify households living in fuel poverty, so they can get the support they need. The Partnership encourages all sectors and organisations to play their part and its members act as advocates for improvements in policy and delivery.

Alongside London Councils the Association of Local Energy Officers (ALEO) London and the London Association of Directors of Adult Social Services (London ADASS) are represented. The Partnership meets three times a year.

The Partnership is co-chaired by Shirley Rodrigues, Deputy Mayor for Environment & Energy, and Debbie Weekes-Bernard, Deputy Mayor for Social Integration, Social Mobility and Community Engagement.

Cllr Claudia Webbe was TEC's nominee in 2018/19 and would like to continue in this role.

3. Financial Implications

There are no financial implications.

4. Legal Implications

There are no legal implications.

5. Equalities Implications

There are no significant equalities implications from this report.

Background Papers:

Short Title of Document	Date	File Location	Contact Officer	Exempt Info Para under Schedule 12A
TEC AGM Mins	June 2013	London Councils/ K-Drive/ Committees/TEC /June 2013	Alan Edwards	N/A

London Councils' Transport and Environment Committee

Dockless Bicycles – Londonwide Byelaw

Item No: 14

Report by: Mike Beevor

Job title: Senior Policy Manager, TfL

Date: 13 June 2019

Contact Officer: Katharina Winbeck

Telephone: 020 7934 9945

Email: Katharina.winbeck@londoncouncils.gov.uk

Summary:

This report updates TEC on the proposed pan-London parking byelaw for the regulation of dockless bicycle hire schemes in London. The report asks TEC to agree to start the process of amending the TEC agreement to delegate the boroughs' functions relating to making the pan-London byelaw to TEC.

Recommendations: Members are asked to:

1. Note the report
2. Agree to consult on and seek written agreement from all London local authorities and TfL to amend the LC TEC agreement as outlined in paragraph 10.

Overview

1. TEC has previously agreed that the correct future approach for dockless bike sharing is to move away from the status quo, where Boroughs reach individual agreements with specific operators, and instead move to borderless operations throughout Greater London.
2. Controlling bike fleets would be achieved by Boroughs using existing powers to designate parking places for dockless bikes, and (following the necessary delegation of powers and subject to the byelaw making procedures) TEC promoting a pan-London bye-law on Boroughs' behalf to prohibit bike operators from parking dockless bikes other than at approved parking places.
3. At the TEC meeting on 21 March, the Committee was informed that dockless bike operators had been briefed on the outline approach, and discussions between TfL, London Councils and Borough Officers were under way to ensure the draft bylaw provided the right controls, and sufficient scope to enable boroughs to retain control of how schemes were managed locally.

Dockless market update

4. There are currently several dockless bike operators working in London, or about to launch:
 - Mobike continues to provide pedal bikes, mostly in Central and Inner London;
 - Lime provides e-bikes through agreements with several London Boroughs and at selected Thameslink rail stations;
 - JUMP launched its first e-bikes in May in Islington and will presumably expand;
 - Freebike & Beryl have been chosen by the City for a 6-month trial beginning this month; and
 - Youon have yet to launch but have been in contact with boroughs with regard to launching a fleet of pedal bikes.

As such there is likely to be an ongoing need to manage dockless bike sharing schemes, and boroughs' concerns regarding the impacts of inconsiderate parking of dockless bikes remain - including the impacts on the comfort and convenience of other highway users.

Byelaw Update

5. A draft byelaw has now been shared with borough officers, and detailed discussions have been held on its precise wording. While these discussions have yet to conclude, in headline terms, the draft text:
 - Defines several terms used in the draft Byelaw currently undefined in legislation (e.g. a dockless operator);
 - States that the byelaw applies throughout Greater London;
 - Sets out minimum safety standards for bikes;
 - Requires all bikes to be chipped to ensure their whereabouts can always be tracked;
 - Requires all bikes to be left (whether by dockless operators or their customers) only in places agreed by the relevant local authority, and makes it an offence for dockless operators to place or allow their bikes to be parked anywhere other than at a location agreed by the local authority; and
 - Sets a penalty for a dockless operator committing the offence.
6. The drafted wording covers dockless bikes and e-bikes and could apply to electric kick scooters or other micromobility vehicles. Local issues, such as how many or how few parking places to approve and where they should be located, are all left for individual

authorities to decide depending on their local circumstances. It is envisaged that approved spaces would not be exclusive to specific operators, but would be open to other dockless companies, to facilitate journeys across borough boundaries. Points of detail on the final wording are now being considered, and several additional areas of work are being developed, for the byelaw to give rise to a viable operational framework for dockless bike sharing in London.

7. The additional work, which is to be developed in partnership with borough officers, will cover:
- Preparation of guidance on how enforcement will be undertaken and managed;
 - The collection, management and provision of data that informs dockless customers and other highway users where you can and can't park dockless vehicles;
 - Proposed procedures for designating or approving parking spaces; and
 - How boroughs may charge operators for the use of the parking spaces they make available.

TfL is also keeping officials in central Government informed on progress.

Amending the TEC Agreement

8. TEC resolutions to date together with detailed feedback received from borough officers indicates broad consensus regarding the proposed pan-London approach and the Byelaw proposal in principle.
9. It is not considered practicable for the same Byelaw to be made, by 33 London boroughs. The making of one Byelaw across all the London boroughs would be more appropriate and would require each of the 33 London local authorities participating in the TEC joint committee arrangements to delegate the exercise of additional functions to the joint committee, which requires the TEC constitution (Governing Agreement, dated 13 December 2001 (as amended)) to be varied.
10. An appropriate amendment would be by way of an addition to the Part 3(D) Functions, inserting a new paragraph 2(c) as follows:

“(c)(i) the making of byelaws under section 235 of the Local Government Act 1972 (and, in respect of the City of London Corporation, under section 39 of the City of London (Various Powers) Act 1961) for the purpose of regulating dockless vehicles on the highway and/or public places (including by making it an offence for a dockless vehicle operator to cause or permit their dockless vehicle to be left on the highway or public place other than in an approved location), including taking all related steps to promote, make, amend and revoke any such byelaw.

(c)(ii) The exercise of powers under Section 1 of the Localism Act 2011 for the purposes of giving effect to (i) above, including but not limited to oversight and management of the arrangements (but excluding prosecution or other enforcement)

- a. Amendments to Part 3(D) are not minor variations for the purposes of Clause 15 of the LCTEC Governing Agreement, but are made by the procedure set out in Paragraph 3(D) 1 of the LCTEC Agreement which provides an alternative process for delegating the exercise of functions to the joint committee without requiring a separate formal variation agreement to be agreed by each authority before the delegation to the joint committee is effective. The procedure was adopted under an earlier formal variation to the Governing Agreement with the consent of all the

London local authorities and TfL and provides that the functions may be delegated by each London local authority to operate under the existing terms of the Governing Agreement “subject to consultation with the Participating Councils and the written agreement of each Participating Council”. (An updated copy of any amended Part 3(D) must also be provided). Past experience shows that gaining consent in this way from all London local authorities can take time. It is therefore proposed that the process commence now.

Proposal and Next Steps

11. The full wording of the byelaw has not yet been finalised, and the work mentioned above (that is to be undertaken in partnership with borough officers) is ongoing.
12. The draft byelaw will need to be consulted upon and will need to include
 - (i) the draft byelaw
 - (ii) an assessment of the regulatory burden and whether it is proportionate, informed by consultation with affected persons; and
 - (iii) a statement assessing the impacts of the proposal and the proportionality of the regulatory burden.
13. It is proposed that in addition to the process of delegation of powers proposed in this report, a further report is made to TEC in October for
 - (i) Approval of the final wording of the draft byelaw;
 - (ii) Delegated authority for the regulatory burden and impact assessments to be finalised by officers;
 - (iii) Authority to seek Ministerial approval of the byelaw (and in relation to a byelaw made pursuant to power delegated by the City of London Corporation, Ministerial confirmation of the byelaw); and
 - (iv) Authority to commence stakeholder consultation.

Borough officers and legal teams will be given sight of the proposed final documents prior to TEC being asked to agree the above, but it is nevertheless recommended that the consultation phase of the delegation process commence now, given the potential time required.

Recommendations: The Committee is asked to:

1. Note the report
2. Agree to consult on and seek written agreement from all London local authorities and TfL to amend the LCTEC agreement as outlined in paragraph 10.

Financial implications for London Councils

14. To be discussed in light of any further legal support that may be required.

Legal implications for London Councils

15. All implications are contained in the body of the report.

Equalities implications for London Councils

16. Addressing inappropriate parking of dockless bikes on the highway in a manner which causes inconvenience or disruption to highway users would help meet the needs of all highway users, particularly those who are blind or partially sighted and those who require wider available footways such as for wheelchairs or buggies.

London Councils' Transport & Environment Committee

Local Implementation Plan funding formula review – Addendum table showing the 2019/20 allocations per borough for current, Option 1&2

Item no:17
(addendum)

Report by:	Alex Williams	Job title:	Director of City Planning
Date:	13 June 2019		
Contact Officer:	Paulius Mackela		
Telephone:	020 7934 9829	Email:	paulius.mackela@londoncouncils.gov.uk

Borough name	2019/20 allocation (£ms)	2019/20 allocation (%s)	1. Current with updated data (£ms)	1. Current with updated data (%s)	2. Initial alternative (LIP working group) (£ms)	2. Initial alternative (LIP working group) (%s)
Inner	26.8	42%	27.8	44%	26.3	42%
Outer	36.2	58%	35.2	56%	36.7	58%
Barking & Dagenham	1.38	2.2%	1.50	2.4%	1.53	2.4%
Barnet	2.97	4.7%	2.80	4.5%	2.80	4.4%
Bexley	1.36	2.2%	1.32	2.1%	1.70	2.7%
Brent	2.15	3.4%	2.19	3.5%	2.14	3.4%
Bromley	2.08	3.3%	2.06	3.3%	2.26	3.6%
Camden	2.03	3.2%	2.07	3.3%	1.88	3.0%
City of London	0.87	1.4%	0.78	1.2%	0.55	0.9%
Croydon	2.36	3.7%	2.39	3.8%	2.54	4.0%
Ealing	2.64	4.2%	2.59	4.1%	2.35	3.7%
Enfield	2.58	4.1%	2.59	4.1%	2.41	3.8%
Greenwich	1.94	3.1%	1.98	3.1%	2.00	3.2%
Hackney	1.77	2.8%	1.97	3.1%	1.80	2.9%
Hammersmith & Fulham	1.50	2.4%	1.50	2.4%	1.52	2.4%
Haringey	1.90	3.0%	1.86	3.0%	1.88	3.0%
Harrow	1.29	2.0%	1.22	1.9%	1.58	2.5%
Havering	1.92	3.0%	1.79	2.8%	1.94	3.1%
Hillingdon	2.37	3.8%	2.23	3.5%	2.08	3.3%
Hounslow	2.27	3.6%	2.22	3.5%	2.03	3.2%
Islington	1.66	2.6%	1.67	2.7%	1.65	2.6%
Kensington & Chelsea	1.46	2.3%	1.52	2.4%	1.37	2.2%

Borough name	2019/20 allocation (£ms)	2019/20 allocation (%s)	1. Current with updated data (£ms)	1. Current with updated data (%s)	2. Initial alternative (LIP working group) (£ms)	2. Initial alternative (LIP working group) (%s)
Inner	26.8	42%	27.8	44%	26.3	42%
Outer	36.2	58%	35.2	56%	36.7	58%
Kingston upon Thames	1.21	1.9%	1.01	1.6%	1.25	2.0%
Lambeth	2.28	3.6%	2.36	3.8%	2.35	3.7%
Lewisham	1.94	3.1%	2.03	3.2%	2.07	3.3%
Merton	1.31	2.1%	1.24	2.0%	1.44	2.3%
Newham	2.06	3.3%	2.18	3.5%	2.23	3.5%
Redbridge	2.08	3.3%	2.03	3.2%	2.02	3.2%
Richmond upon Thames	1.46	2.3%	1.21	1.9%	1.41	2.2%
Southwark	2.05	3.3%	2.20	3.5%	2.28	3.6%
Sutton	1.06	1.7%	1.03	1.6%	1.42	2.3%
Tower Hamlets	2.18	3.5%	2.39	3.8%	2.17	3.4%
Waltham Forest	1.83	2.9%	1.83	2.9%	1.83	2.9%
Wandsworth	2.05	3.3%	2.04	3.2%	2.17	3.5%
Westminster	3.03	4.8%	3.21	5.1%	2.36	3.8%

London Councils' Transport & Environment Committee

Safe Speeds Review for London – Item No: 18 Update

Report by: Andrew Luck **Job title:** Transport Manager
Date: 13 June 2019
Contact Officer: Andrew Luck
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Summary: This report provides a further update on current activities examining the speed enforcement process in London and outlines future proposals following the Committee's firm commitment in March 2019 to explore the feasibility of boroughs enforcing speed limits on their roads.

Recommendations:

The Committee is asked:

- a) to note the contents of the report; and
- b) approve the estimated £12,000 (+ VAT) from TEC's research budget to seek legal Counsel advice.

Background

1. On 21 March 2019 London Councils presented an update report to TEC outlining the progress to date and the future proposed work on the issues impacting the current levels of speed restriction enforcement in London. Previously TEC Members had indicated that they had concerns about the adequacy of the current level of speed restriction enforcement and the limitations with the criteria for deploying enforcement cameras and personnel on roads where speeding issues were known. Members had felt that the perceived lack of enforcement was impacting their ability to deliver the aims of the Mayor's Transport Strategy in reducing vehicle speed and the ambitions of 'Vision Zero for London'.

2. The report outlined a number of future initiatives for improving engagement with boroughs including the examination as to whether boroughs could play a more active role in the enforcement of speed restrictions, including possible total or partial decriminalisation; an assessment of existing speed camera criteria that would seek to improve coverage and move to a more flexible risk based methodology; the production of a lower speeds toolkit that outlines in detail the traffic management and streetscape measures that can be undertaken to lower speed; a knowledge sharing platform to learn from boroughs about their experiences of introducing 20mph zones; and a borough engagement programme regarding the implementation of 20mph zones on the TLRN.
3. It was clear from some Members at the meeting on 21 March, that future enhanced borough powers including decriminalisation of speed restriction enforcement needed to be explored comprehensively as a matter of high priority. There was a feeling that existing enforcement levels were not sufficient enough to act as a deterrent for speeding motorists and instances of speeding (especially in residential areas where levels of enforcement is low) was having a significant impact on road safety.
4. Following discussions at the TEC meeting on 21 March, a number of actions points for follow up work were identified. These will be discussed in this report and included:
 - A further TEC update in June 2019
 - A note that the education element as to the reason that 20mph zones were being implemented was being neglected
 - Agreement to set up a TEC working (Steering Group) to help inform the work on speed limit enforcement and 20mph zones
 - Note that the TEC reserve budget could be used to pilot a possible (dummy) trial enforcing speed limits in London boroughs.

Current Activity

Steering Group

5. Following the TEC meeting in March, it was agreed that a Steering Group should be established with political representation to provide detailed input into the Safe Speeds Review for London, its enhancement and the potential future role of boroughs and TEC. The Steering Group would also provide oversight of the review and the work of the officer Working Group. The Steering Group consisting of nominated representatives of the Transport and Environment Committee was established under the Urgency Procedure as outlined in the consultation report of 14 May 2019. The full Terms of Reference for the Steering Group can be seen in Appendix A. The first meeting of the Steering Group is being organised and is hoped to be held in June.

Legal Advice

6. The TEC report of 21 March outlined the current legislative limitations with respect to boroughs taking a more active role in the enforcement of speed restrictions in London. Advice that both London Councils and TfL received from

their own legal teams indicated that currently there is no legislative basis for the decriminalisation of speed enforcement and any existing powers that could enable boroughs to prosecute criminal cases are limited and untested. Legal advice also indicates that there is no legislative basis for boroughs to offer, or to raise revenue from, diversionary/awareness courses.

7. In order to better understand how authorities may enforce speed limits on the roads that they are responsible for, London Councils is engaging with its legal advisors to draft instructions to seek legal counsel view on the current legislative constraints and what statutory changes would need to be made to allow for full or partial decriminalisation. This will include an exploration to determine whether it is possible to retain dual criminal and decriminalised regimes to allow for borough enforcement of minor contraventions for example, and the Police to retain the power to prosecute the more serious offences. This will also examine the possible role in authorities running speed awareness courses.
8. There will also be consideration given to the differences between TLRN and non-TLRN roads and the implications of a borough choosing not to take up a potential future option to enforce speeding and whether the police would retain responsibility in this circumstance.
9. London Councils will also seek a legal view as to whether authorities have any existing powers, for example, using section 222 of the Local Government Act 1972, to prosecute criminal cases such as speed offences. Counsel advice will also be sought to establish whether it is possible to conduct a trial or pilot of possible decriminalisation or devolved powers without a requirement to change existing legislation. If so, London Councils' officers will seek to work with interested boroughs and other key stakeholders to achieve this. If this is not possible then any pilot may only be an evidence gathering exercise but one that may add value to future lobbying in this area.
10. A set of questions will be considered at the first meeting of the Steering Group before instructing counsel, hopefully by the end of June.

Communications

11. Engagement with key stakeholders about the possible changes to the way speed is enforced in London is vital to ensure all that all expert views are captured and considered. London Councils and TfL have a planned meeting on June 24 2019 with key road safety stakeholders including Brake, 20's Plenty and Road Peace. The aim of this meeting is to present and discuss the plans for the Safe Speeds Review for London, including possible decriminalisation, which will help inform the discussion and the direction of the work.
12. One of the key considerations outlined by TEC Members was the importance of building an education element into any communication programming by outlining the reason that speed limits are in place, why they are set at the level they are and the positive impact that compliance has on road safety. Discussions held with officers at the Working Groups also identified this as an issue where there was agreement that whilst enforcement is important to improving compliance, it is not the only tool that can be used. Any enforcement needs to be complemented by enhanced public communications outlining the benefits of speed management and why it is important such controls are in place. This has been noted and

enhanced communications on all levels should feature in future speed management plans.

Working Groups

13. To date, London Councils and TfL have held three Working Group meetings with borough officer representatives and the Metropolitan Police.
14. The initial high level 'kick off' meeting was held on 13 March 2019 and provided an opportunity to outline and discuss the planned work areas with officers and the issues surrounding speed limit enforcement in general. The first sessions set the scene within a vision zero context and discussed the future approach of the Working Group, also establishing the participants for these groups that will examine the areas of focus in more detail. There followed two workshop sessions, the first seeking borough officer views of TfL's Lower Speeds Toolkit and the second seeking opinion on the existing speed camera criteria and the proposals for a revision of this criteria.
15. On 8 April 2019 London Councils and TfL held two more detailed Working Group meetings at London Councils' offices with borough representatives and the Metropolitan Police examining Safety Camera Criteria and Speed Enforcement.
16. The Safety Camera Criteria meeting outlined the current criteria for determining the deployment of speed cameras which takes a reactionary approach based on the number of recorded collisions involving injury and the plans to move to a more proactive 'risk based' approach. To do this, TfL identified that they required borough co-operation to undertake analysis of the possible approaches to camera site selection and prioritisation. This included the identification of datasets and models that could be utilised in this methodology and any associated constraints; the determination of road characteristics that identify locations with a high risk of speeding; determining a technique to prioritise deployments at identified locations; and setting out options for a 'tool' that incorporates this methodology. The aim of this to deliver a list of prioritised locations for safety camera deployment.
17. Boroughs indicated that they were broadly supportive of this approach and were keen to support TfL in this work. There were concerns that the pressure on finances could still limit the actual number of cameras and these limitations may not see substantial difference in the sites ultimately chosen. There was support for cameras that could be redeployed around the network, thus increasing coverage and providing more of a deterrent. Ultimate support will depend on the final documentation, but it is important that boroughs are involved in this process.
18. At the interactive session on Speed Enforcement TfL and the MPS outlined current levels of speed enforcement which attendees agreed were higher than perceived levels.
19. The working group highlighted a number of issues with the current speed enforcement process that review is looking to address. The four main points identified at the meeting were:
 - Attendees were unaware of current levels of speed enforcement activity.

- There was little vocal support for the full decriminalisation of speed enforcement at the meeting however some attendees were keen to consider how local authorities could support the police within the scope of existing legislation.
 - Most attendees wanted additional contact with the police regarding community concern locations and visibility of current activity. Many officers were unaware of who to contact in the Roads and Transport Policing Command (RTPC). An improvement in communications was a key issue for boroughs.
 - The TfL/MPS plans for increasing speed enforcement levels were well received and provided reassurance to boroughs but they wanted to ensure that this would lead to an increase in enforcement on residential roads.
 - It was identified that TfL need to be notified when safety cameras are taken out of service due to the resurfacing of borough roads as this will prevent their enforcement.
20. As well as these issues, borough officers also identified that current resources meant that implementing compliant 20mph zones by design only was difficult; enforcement activity needs to be considered as a key part of wider compliance measures; enhanced data sharing about speed compliance is required; there needs to be greater visibility and transparency of police enforcement; the possibility of re-introducing the London Safety Camera Partnership or similar group to discuss these issues needs to be explored (although it was agreed that the speed enforcement working group can perform a similar function and provide a forum at which we can discuss these issues with boroughs).
21. The recurring factor of these discussions was that current communications levels between boroughs, TfL and the police with regards to speed enforcement in general needs to improve. There is a key commitment to improve communications across the board to provide more transparency and a structured process for boroughs to feed in intelligence and request police enforcement to deal with community concerns.
22. Further Working Group meetings are planned for June and July and details of these will be fed back to TEC at the next meeting.

Proposed changes to speed enforcement activity

23. Following the initial working group meetings outlined in the previous section London Councils have worked with TfL and MPS to consider how best to respond to the issues raised. TfL and the MPS have committed to the following actions:
- Work with boroughs, suppliers and other stakeholders to develop a policy and a process by which boroughs can fund the installation and maintenance of additional speed cameras at locations of their choice.
 - Implementation of a process by which Boroughs can report intelligence about poor road user behaviour. This will be considered and fed into the RTPC intelligence and tasking process, ensuring that borough concerns are considered and dealt with appropriately.

- Identification of a series of local police contacts who can act as points of contact for speed related issues. These will be locally based officers with specific knowledge of borough issues and traffic policing and who are well placed to respond to speed related concerns. This has already been actioned.
 - Identification of a strategic contact within the RTPC to act as a senior single point of contact for strategic road danger issues. This will be at Inspector level. This has already been actioned.
24. The above actions are in addition to the planned increase in speed enforcement activity which will result in an increase in the number of offences processed from 160k to 1 million per annum. This will be delivered through an increase in safety camera enforcement activity as well as an increase in on-street activity and mobile speed enforcement equipment. This will be supported by an effective communications strategy to amplify the deterrent effect of the police enforcement.

Financial Implications

25. The majority of the review work will be completed using exiting London Councils' resources. However, it is estimated that the cost of seeking legal Counsel opinion will be £12,000 (+VAT) and this can be met from the TEC annual research budget of £40,000. There are no other financial implications at this stage for London Councils, London boroughs or TfL.

Legal Implications

26. There are no legal implications at this stage. However, there may be future legal implications to be considered by TEC in the future depending on the outcome of the review.

Equalities Implications

27. There are no equalities implications at this stage.

Recommendations

The Committee is asked:

- c) to note the contents of the report; and
- d) approve the estimated £12,000 (+ VAT) from TEC's research budget to seek legal Counsel advice.

Appendix A

Safe Speeds for London – Steering Group Terms of Reference

Appendix A

Safe Speeds Review for London - Steering Group Terms of Reference

Background

Following concerns raised by London local authorities regarding the adequacy of speed enforcement in London, and the limitations in the criteria for the deployment of speed enforcement cameras and police enforcement activity, London Councils' Transport and Environment Committee (TEC) agreed to review what more can be done to improve speed compliance in London, including the feasibility of boroughs of having enforcement powers.

Aim

Enhancing the enforcement of speed limits to achieve better speed compliance and improve road safety for everyone. To consider the potential role of boroughs and TEC in achieving that aim.

Role

To provide detailed input into a review of speed limit enforcement ("safe speeds review"), its enhancement, and the potential role of boroughs and TEC. To provide oversight to the safe speeds review and the work of the officer Working Group.

Membership

The steering group shall comprise elected Members and officers representing TEC, London Councils, TfL and Metropolitan Police, as follows:

Member representation:

Five drawn from the Labour Party;
Two from the Conservative Party; and
One from the Liberal Democrat Party.

Officer representation:

One from London Councils;
One from TfL; and
One from the MET Police.

The Steering Group shall be chaired by the Chair of TEC.

Each political group and organisation shall confirm their nominated members of the steering group ahead of the inaugural meeting.

Other officers from each of the partner organisations and wider stakeholder groups including the GLA will attend from time to time as advisors, observers or presenters, as necessary.

Attendance

Meetings will be held at London Council's offices at 591/2 Southwark Street, SE1 0AL.

The frequency, date and timings of meetings shall be discussed and agreed as required but will last no more than 2 hours and are not likely to be more frequent than every four weeks.

If a designated member is unable to attend, they should endeavour to nominate a representative in advance.

The quorum shall be one third of the membership.

Attendance via telephone or video link facility will be accommodated where necessary and if room facilities allow.

Working Group

An officer working group chaired by London Councils has been established with representatives from London Councils, TfL, GLA, individual boroughs and the MET Police. The working group will meet more frequently than the steering group to carry out much of the detailed work of the review.

Governance and Reporting

Formal TEC approval will be sought for the establishment of the Steering Group and its terms of reference.

The Steering Group will not incur or instruct officers to incur any expenditure or use excessive time without prior authority.

The steering group will provide regular updates to TEC and will obtain TEC authority for all decisions.

The working group will be steered by and report progress to the Steering Group.

London Councils' Transport and Environment Committee

Direct Vision Standard for Heavy Goods Vehicles

Item No: 19

Report by: Spencer Palmer **Job title:** Director, Transport & Mobility
Date: 13 June 2019
Contact Officer: Spencer Palmer, Director, Transport & Mobility
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Summary:	This report is an update on the Phase 2c consultation on the proposed London HGV Safety Permit Scheme (Scheme) to reduce road danger in London, which included a statutory consultation on a traffic order ("the Amendment Order") to implement the Scheme under the Committee's traffic regulation order powers.
Recommendations:	<p>Members are asked to:</p> <ol style="list-style-type: none"> 1. Consider the responses from the Phase 2c consultation detailed in this report, together with comments, and at Appendix G; 2. Agree to continue with the process to make the Amendment Order; 3. Note the position regarding the identified potential objections described in paragraph 18; 4. Agree not to hold a public inquiry before making the Amendment Order and authorise the Director Transport & Mobility to cancel the provisional public inquiry arrangements 5. If TEC is satisfied of the merits, agree to make the Amendment Order and delegate to the Director Transport &

	<p>Mobility authority to publish notice of making;</p> <p>6. Note the position regarding Barnet LBC participating in the Scheme and the LLCS.</p>
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Overview

1. The Direct Vision Standard (DVS) has been developed in order to address the high number of collisions involving HGVs and people walking and cycling in London¹. Using a star system, the DVS rates HGVs from zero (lowest) to five (highest) stars, based on how much a driver can see directly through their HGV cab windows. It is proposed to implement the Standard for HGVs over 12 tonnes (gvw) by the “HGV Safety Permit Scheme” (“Scheme”).
2. From 26 October 2020, it is proposed all HGVs of over 12 tonnes (gvw) would be required to obtain a permit (HGV Safety Permit) to operate in Greater London and those vehicles that do not meet the minimum DVS standard (one star or un-rated until 26 October 2024 and three stars or un-rated after that date) will be required to fit additional safety measures to increase its safety for other road users. It is proposed that the Scheme is implemented by making changes to the Greater London (Restriction of Goods Vehicles) Traffic Order 1985 (“the 1985 Order”) under which the London Lorry Control Scheme (LLCS) currently operates. This is done by the Greater London (Restriction of Goods Vehicles) Traffic Order 1985 (Amendment) Order 2019 (“Amendment Order” at **Appendix A1**) for which statutory notices of proposals/ intent were published on 26 April 2019.
3. This is the seventh time the DVS and Scheme have been reported to TEC. The last report in March 2019 outlined preparation for the Phase 2c consultation, TfL’s request to use the 1985 Order to implement the scheme and an update on the Phase 2b consultation. The Committee also considered the Amendment Order’s changes to the 1985 Order, and the other “deposit documents” that form part of the Scheme: a Statement of Reasons for making the Order, the Combined LLCS & HSP Policy Statement (**Appendix C**), HGV Safety Permit Conditions (**Appendix D**) and Safe System’ vehicle safety measures (**Appendix F**).
4. This report updates the Committee on the following:
 - Phase 2c consultation responses, including identified potential objections which have since been withdrawn or clarified as comments rather objections; and

¹ In 2017, 29 per cent of pedestrian and 60 per cent of cyclist fatalities involved a HGV, despite HGV usage only making up four per cent of road miles in London.

- Proposed next steps including the making of the Amendment Order.
5. The Committee is asked to consider the consultation responses and the merits of proceeding with the scheme. In light of that consideration, the Committee's formal approval is sought to continue with the process seeking to make the Amendment Order. There were four representations on which clarity was sought. Those respondents have been contacted to seek clarity as to the nature of the representations, and all four have clarified in writing that their representations are not objections or in the case of one, have withdrawn their objection.
 6. Officers do not consider that holding a public inquiry in the absence of objections will add anything significant to the information already obtained and previously reported to the Committee for the purpose of proceeding with the Scheme.
 7. There are three potential scenarios described at paragraphs 22 to 24 below depending on whether it is decided a public inquiry is to be held. These paragraphs set out delegations to the Director Transport & Mobility depending on the circumstances described.
 - If no inquiry is held then the Committee is asked to make the Amendment Order and delegate to the Director Transport & Mobility authority to cancel the provisional arrangements made for a public inquiry and publish notice of making of the Amendment Order.
 - In the event a public inquiry is held and the Inspector in their report raises no objection, or makes only recommendations for non-material modifications to the Amendment Order and/ or Scheme Documents, to delegate to the Director Transport & Mobility power to approve the making of the Amendment Order. (In either scenario officers would proceed to publish statutory notice of making.)
 - Any different conclusion from the public inquiry will result in a report to the Committee's October 2019 meeting seeking instructions on how to proceed. Further information is provided below.

Background

8. Four phases of policy consultation have been held to help develop a scheme proportionate to the problem of HGV and cyclist and pedestrian safety. The recent Phase 2c consultation (April 26 – May 23 2019) consulted on the final Scheme proposals and the Amendment Order to the 1985 Order. Under the proposals, it would be unlawful to operate a HGV over 12 tonnes (unless exempt) in Greater London without a HGV Safety Permit issued under the

Scheme. Permits will be free of charge and available electronically via an online permit application portal. (**Appendix E: Permit Application Process**).

9. The proposed Scheme would be delivered in three phases:

- **October 2019:** The permit scheme will go live, allowing permit applications to be made on a voluntary basis for 12 months².
- **26 October 2020:** Scheme enforcement begins - all HGVs over 12 tonnes would require a HGV Safety Permit to operate in London and those rated zero star (or un-rated) would be required to demonstrate compliance with a 'safe system' of additional vehicle safety measures (**Appendix F**). Only vehicles not meeting the minimum DVS star rating threshold and not complying with the Safe System would be banned. Scheme enforcement will be done by issue of Penalty Charge Notices (PCNs) utilising the TfL ANPR camera network and on-street enforcement.
- **26 October 2024:** HGV Safety Permit requirement retained and **three stars** set as the minimum DVS threshold. Zero, one and two star HGVs must demonstrate compliance with a revised or progressive "Safe System"³ requirements. A consultation on the revised Safe System will take place in 2022 to allow a reasonable period for adjustments.

Implementation of the HGV Safety Permit Scheme

10. TfL and the London local authorities (through their delegated authority to TEC) propose using their traffic regulation powers to implement the Scheme under highway safety traffic order powers⁴ to make it unlawful (1) to operate a HGV over 12 tonnes (gvw) in Greater London without a HGV Safety Permit from 26 October 2020 or (2) to breach permit conditions where they are imposed including conditions imposing the Safe System where the minimum DVS requirement is not met. Using the 1985 Order allows the Scheme to be introduced on a London-wide basis covering both the TLRN and borough roads and to have de-criminalised enforcement by PCN at two levels (£500 for operators and £130 for drivers). Recipients of PCNs would have the right (subject to TEC approval) to appeal to the Environment and

² The HGV Safety Permits of vehicles rated zero star or un-rated (subject to the Safe System Conditions) will expire at the end of 25 October 2024; those rated one or two star will expire at the end of 25 October 2024; and those rated three, four or five star will expire at the end of 27 October 2030 or ten years after the application date if granted later than 28 October 2020 (whichever is the later).

³ The progressive safe system will include advances in proven safety technology not available in 2020

⁴ Sections 6 and 1(1) of the Road Traffic Regulation Act 1984 (as amended)

Traffic Adjudicators at London Tribunals. The operational enforcement of the Scheme would start on 26 October 2020 to allow a reasonable pre-compliance period and to align with the higher emissions standards under the Low Emission Zone (LEZ) for heavy vehicles on that same date.

11. The imposition of the basic requirement to obtain a HGV Safety Permit involves making changes to the 1985 Order, under which the LLCS is legally established and operates.⁵ The Committee has previously endorsed this approach in principle, subject to the outcome of the recent Phase 2c consultation. The order making and approval process is set out in the Local Authorities Traffic Orders (Procedure) (England and Wales) Regulations 1996 (“1996 Regulations”).
12. At its last meeting the Committee approved the promotion of the Amendment Order at **Appendix A1** on the basis of the changes it proposed making to the text of the 1985 Order shown at **Appendix A2** (based on current proposals). The major change is to incorporate the Scheme: inserting into Article 3(a)(i) a prohibition on HGVs over 12 tonne operating in London without a permit (HGV Safety Permit) issued under Article 4(1). This follows the same approach as with the LLCS. The Committee also approved the Statement of Reasons at **Appendix B**. The Committee appointed TfL to undertake the Phase 2c consultation, including the statutory consultation on the Amendment Order under the 1996 Regulations, on its behalf and to make provisional arrangements for a public inquiry if there were objections.
13. The 1985 Order as changed by the Amendment Order also refers to:
 - **A Policy Statement:** this sets out the policy basis for issuing permits, including the new HGV Safety Permit. A copy the Combined LLCS & HSP Policy Statement is at **Appendix C**. The policy considerations relating to the LLCS are unchanged. Those for the Scheme state that a minimum DVS rating is to be regarded as the appropriate level of direct vision necessary to operate a HGV safely in Greater London without requiring additional safety (Safe System) measures to be fitted to the vehicle. This is one star (or un-rated) until 26 October 2024 and three stars from that date.
 - **Permit Conditions:** set out any conditions subject to which a permit is to be issued. Here, the conditions for a HGV Safety Permit are sufficiently different to the LLCS to justify its own set of conditions, modelled closely on the LLCS conditions. A copy of the proposed HGV Safety Permit Conditions is at **Appendix D**.

⁵This would ensure synergies through a single instrument for HGV operating standards in London, covering both environmental and highway safety issues

The above, together with the Safe System measures (**Appendix F**), form the “Scheme Documents”.

Progress to date

Phase 2c consultation including notice of proposals/ intent

14. The Phase 2c consultation ran for four weeks from 26 April to midnight on 23 May 2019.

Statutory notices of proposals/ intent were published in the London Gazette and Evening Standard. It stated that all objections and other representations to the Amendment Order and/ or proposed Scheme must be made in writing and (in the case of objections to the Amendment Order) must specify the grounds on which they are made. It also stated that a public inquiry in connection with the Amendment Order and Scheme would be held (on 9 July) if objections within regulation 9(3) of the 1996 Regulations were made and not withdrawn (see below), subject to the Committee’s consideration of responses and confirmation as to whether a public inquiry would be held.

Phase 2c consultation responses

15. A total of 25 responses to the Phase 2c consultation and statutory notice were received. They are overall in favour of the Scheme as presented. A copy of the full responses can be found at **Appendix G**, anonymised to protect personal data, unless they are a stakeholder. Key positive comments included:

- I support improving safety for vulnerable road users.
- Increasing the use of direct vision and safety systems seems like a sensible approach
- I think lorries should be made safer.
- I support these proposals. I think it is very important to ensure London is dominated by walking, cycling and public transport rather than by HGVs.
- We welcome the introduction of the Direct Vision Standard applied from October 2020 as a first step towards making safer lorries the ‘norm’ in London.

16. TfL officers’ responses are shown below to the key negative comments received:

TfL is only focusing on vehicle safety	We are committed to reducing road danger, by working in partnership with the police, London boroughs and stakeholders to achieve the Vision Zero ambition of creating a road network free from death and serious injury by 2041. This includes the widespread introduction of lower speed limits, investing in safer junctions (representing a £54 million
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	investment over the next five years), removing the most dangerous HGVs from London's roads and supporting boroughs to transform their roads with funding such as the multi-million pound Liveable Neighbourhoods scheme.
Safe System - Suggest the audible alerts and sensors are removed -Include repeater indicator lights	<p>In developing the Scheme proposals, a Safe System Advisory Group was set up with representatives from pedestrian and cycling groups, industry trade associations, vehicle manufacturers and government organisations to expand and inform the detail of the Safe System and the measures and the principles behind setting, testing and maintaining the system. This advisory group set out criteria that the safe system measures should be aligned with industry best-practice, readily available on the market place and not cost prohibitive. As repeater indicator lights do not meet the above criteria, we have not included them as a requirement for the 2020 safe system proposal. However, this is something we will review and consider during the 2022 progressive safe system consultation.</p> <p>The requirements of the 2020 Safe System (including audible alerts and sensors) align with existing industry best practice and safety schemes, including FORS and CLOCS.</p>
Concern hire and foreign vehicles will not be aware of the Scheme	<p>Ensuring a level playing field for all vehicle operators is of paramount importance to us, this includes ensuring that the scheme is adequately communicated to all operators, including hire and foreign based vehicles. We have been working with the British Vehicle Rental and Leasing Association to ensure that operators renting or leasing their vehicle are aware of the London HGV Safety Permit requirements.</p> <p>Later this year we will launch our marketing awareness campaign for the Scheme which will provide information on how to comply and apply for a Permit. As well as a UK focused campaign, there will be a campaign</p>

	<p>focussing on informing non-UK based operators. The campaign will include a range of activities, including:</p> <ul style="list-style-type: none"> • Publication of Scheme details on the Urban Access Regulations in Europe portal • Articles in European Freight media • Communication via European Freight Trade Associations and stakeholders • Marketing at prominent locations for non-UK HGVs, e.g. ports and Eurotunnel
Regulation should be set at national/international level	<p>While we would also like to see the DVS set at a European and National level within the regulations governing the design and safety of HGVs, there is a particular problem in London with HGV and pedestrian and cyclist safety which is why we are taking action now. We are confident there are no other cities in the world working on a DVS for HGVs, but to further reduce the risk of competing standards, we have and will continue to involve manufacturers, the Department for Transport and the European Commission and the United Nations Economic Commission for Europe (UNECE) with the aim of influencing and aligning regulations.</p>
Progressive Safe System – more certainty needed	<p>In response to concerns from the freight industry, we have committed to consulting on the progressive safe system in 2022, which is two years ahead of the planned strengthening of the HGV Safety Permit Scheme in 2024.</p>
Concerns over capacity in the hire market for compliant vehicles	<p>For hire vehicles, either the lease company or the hirer can request a DVS rating and apply for the HGV safety permit. We will continue to work with the British Vehicle Rental and Leasing Association to communicate the London HGV Safety Permit requirements to the hire and leasing industry.</p>

17. In light of responses received, officers recommend that the process seeking to make the Amendment Order is continued, and officers do not recommend that any changes are made to the overall Scheme as presented for consultation, including the Amendment Order or other Scheme Documents.

Requirement for a public Inquiry

18. A public inquiry must, be held if the effect of the Amendment Order is;
- (1) to prohibit the loading or unloading of vehicles or vehicles of any class in a road on any day of the week at all times – which is the case here as a result requirement to obtain a HGV Safety Permit to be able to operate a HGV over 12 tonnes in Greater London -
 - And
 - (2) an objection has been made to the Amendment Order (other than one which the order making authority is satisfied is frivolous or irrelevant) and is not withdrawn.

Identified potential objections

19. Four representations which could potentially amount to statutory objections to the Scheme and/ or Amendment Order under regulation 9(3) were identified. These are from the Road Haulage Association (RHA), Freight Transport Association (FTA) and two Transport Operators as set out above and in full at **Appendix G**. Those respondents have been contacted to seek clarity as to the nature of the representations and they have clarified in writing that their representations are not objections or in one case, withdrawn their objection.
20. Officers are of the view that there are no responses which amount to a statutory objection and therefore the legal requirement for a public inquiry is not triggered. Leading Counsel has confirmed this view.

Discretion to hold a public inquiry

21. The Committee has a general discretion to hold a public inquiry in connection with the Scheme, its related Amendment Order and other Scheme Documents, irrespective of whether a formal objection is made.

Public inquiry arrangements and process

22. In anticipation of potential objections or if the Committee decided to exercise their discretion to hold a public inquiry, arrangements were made for an inquiry to be held on 9 July 2019 before an Inspector nominated by the Planning Inspectorate. The notice of proposals/ intent published on 26 April 2019 gave details of the inquiry, including venue, and asked for any written representations for the inquiry to be sent to TfL and/ or London Councils, marked for the Inspector's attention.
23. If a public inquiry is held the inquiry would normally hear representations from or on behalf of the order making authority (London Councils and TfL), any objectors or others wanting to make representations, after which the inquiry will close and the Inspector will prepare a report.

24. The Committee must consider the Inspector's report and any recommendations/suggested amendments before deciding whether or not to formally make the Amendment Order and approve the other Scheme Documents. The Inspector's report is not binding but must be given appropriate consideration and weight by the Committee.
25. If in light of the report the Committee decided to approve the making of the Amendment Order (with or without modifications) then a statutory notice of making is published. This notice triggers a six week period within which a statutory challenge to the making of the Order can be lodged in the High Court by any person on grounds that it is not within relevant powers or that any requirements of the relevant statutory procedures have not been complied with.
26. Officers do not consider that holding a public inquiry in the absence of objections will add anything significant to the information already obtained and reported to the Committee for the purpose of proceeding with the Scheme. Four rounds of public and stakeholder consultations have been held to date as the DVS itself and the Scheme has been developed in response to consultation feedback and engagement with vehicle manufacturers, construction and haulage industry operator representatives and safety groups, amongst others.

Delegations to Director Transport & Mobility

27. Subject to paragraph 28 below, in the event a public inquiry is not held, then the Committee is asked to approve the making of the Amendment Order at **Appendix A1** and related Scheme Documents at **Appendices C to F**, having considered the representations from the Phase 2c consultation set out in this report and the merits of proceeding with the scheme. In this situation the Committee is also asked to authorise the Director Transport & Mobility to cancel the public inquiry and to proceed to publish statutory notice of making in the Evening Standard and London Gazette.
28. Subject to the paragraph 29 below, in the event a public inquiry is held and in his report the Inspector raises no objection, or makes only recommendations for **[non-material]** modifications to the Scheme generally, Amendment Order and/ or Scheme Documents, then the Committee is asked to delegate to the Director Transport & Mobility power to approve the making the Amendment Order and Scheme Documents above (including power to make non-material modifications to them in accordance with any changes recommended by the Inspector). In this situation the Committee is also asked to authorise the Director Transport &

Mobility to make and approve the Amendment Order and related Scheme Documents (including as modified) and to proceed to publish statutory notice of making in the Evening Standard and London Gazette.

29. However, if a public inquiry is held and the Inspector's report recommends either (1) not proceeding with the Scheme and/ or (2) the making of the material modifications to the Scheme, Amendment Order or other Scheme Documents then no action will be taken by the Director Transport & Mobility under the above delegations. Instead, a report will be brought to the Committee's October 2019 meeting to consider the Inspector's report and recommendations and to take instructions from the Committee on how to proceed.

Barnet

30. The London borough of Barnet left the LLCS in 1996 and did so by passing its own traffic regulation order to take it out of the ambit of the 1985 Order that originally established the LLCS. Barnet has agreed to be part of the HSP Scheme and the LLCS. TfL and London Councils are working with Barnet officers to allow the authority to come back under the jurisdiction of the 1985 Order. The Amendment Order is therefore drafted so that it comes into effect in Barnet when made.

Next steps

31. If endorsed by TEC, TfL will work closely with London Councils to finalise the implementation of the Scheme.
32. A report on progress will be brought to the October TEC meeting.

Recommendations

Members are asked to:

1. Consider the responses from the Phase 2c consultation detailed in this report, together with comments, and at **Appendix G**;
2. Agree to continue with the process to make the Amendment Order
3. Note the position regarding the identified potential objections described in paragraph 18
4. Agree not to hold a public inquiry before making the Amendment Order and authorise the Director Transport & Mobility to cancel the provisional public inquiry arrangements
5. If TEC is satisfied of the merits, agree to make the Amendment Order and delegate to the Director Transport & Mobility authority to publish notice of making.
6. Note the position regarding Barnet LBC participating in the Scheme and the LLCS

Financial Implications

The proposed Scheme would be developed with no implementation, operational or future costs to TEC or the London boroughs. TfL will bear all costs involved in the Scheme both now and in the future, including any legal or litigation costs, the holding of a public inquiry, and Barnet re-joining the LLCS, and any signage costs.

Equalities Implications

There are currently no equalities implications arising from the recommendations. A full Integrated Impact Assessment (IIA), including an equalities impact assessment, was published as part of the Phase 2a consultation and an updated IIA was included in the Phase 2c consultation.

Background Information

- Information on the DVS and HSP Scheme proposal: www.tfl.gov.uk/direct-vision-standard
- Phase 1 consultation: <https://consultations.tfl.gov.uk/roads/direct-vision-standard-phase-1/>
- Phase 2a consultation: <https://consultations.tfl.gov.uk/roads/direct-vision-standards-phase-2/>
- Phase 2b consultation: <https://consultations.tfl.gov.uk/roads/direct-vision-standard-phase2b/>
- Phase 2c consultation: <https://consultations.tfl.gov.uk/roads/direct-vision-standard-phase2c/>

Appendix A1: Greater London (Restriction of Goods Vehicles) Traffic Order 1985 (Amendment) Order 2019 (“Amendment Order”)

Appendix A2: Amended 1985 Order (shown with changes by the above)

Appendix B: Statement of Reasons for the Amendment Order

Appendix C: Combined LLCS and HGV Safety Permit Policy Statement

Appendix D: HGV Safety Permit Conditions

Appendix E: HGV Safety Permit application process

Appendix F: Safe System measures

Appendix G: Summary of Responses to Phase 2c consultation

GREATER LONDON COUNCIL TRAFFIC MANAGEMENT ORDER

1985 No. 343

The Greater London (Restriction of Goods Vehicles) Traffic Order 1985

Made 15 July 1985

Coming into operation 16 December 1985

As amended to January 2010 by 9 Amendment Orders

The Greater London Council (hereinafter called 'the Council'), after consulting the Commissioner of City of London Police, the Commissioner of Police of the Metropolis, the Common Council of the City of London, and the Councils of all the London Boroughs, in exercise of the powers conferred by section 6 of the Road Traffic Regulation Act 1984, and of all other powers thereunto enabling hereby make the following Order:-

1. This Order shall come into operation on 16 December 1985 and may be cited as the Greater London (Restriction of Goods Vehicles) Traffic Order 1985.
- 2.— (1) In this Order:—
 - "Blackwall Tunnel Northern Approach" has the same meaning as in the Tower Hamlets (Prescribed Routes) (No. 5) Traffic Order 1979;
 - "East Cross Route" has the same meaning as in the Hackney and Tower Hamlets (Various Prohibitions and Restrictions) (No. 1) Traffic Order 1979;
 - "Enactment" means any enactment, whether public, general or local, and includes any order, byelaw, rule, regulation, scheme or other instrument having effect by virtue of an enactment and any reference in this Order to any enactment shall be construed as a reference to that enactment as amended, applied, consolidated, re-enacted by or as having effect by virtue of any subsequent enactment;
 - "Highway Maintainable at the Public Expense" has the same meaning as in section 329(1) of the Highways Act 1980;
 - "Permission" means a permission granted by or on behalf of the Council under the provisions of Articles 5 or 6 hereof which exempts a vehicle from the prohibition imposed by this Order;
 - "Prescribed Hours" means the times
 - i) between midnight and 7.00am and between 9.00pm and midnight on Mondays to Fridays inclusive;
 - ii) between midnight and 7.00am and between 1.00pm and midnight on Saturdays; and
 - iii) at any time on Sundays;
 - "Restricted Street" means any highway maintainable at the public expense or length of such highway in Greater London not being a street of length of street specified in the Schedule to this Order;
 - "Goods Vehicles" and "Maximum Gross Weight" have the same meaning as in the Traffic Signs Regulations and General Directions 1981.
- (2) Any reference in this Order to a policy statement shall be construed as a reference to a statement published by or on behalf of the Council of the Council's policy on the granting of permission, being the policy which applies at the time when the Council is considering the grant of a permission under the provisions of this Order.
- (3) The prohibition imposed by this Order is in addition to and not in derogation of any restriction, prohibition or requirement imposed by any other enactment and any exception or exemption is without prejudice to the provisions of any other enactment.
- 3.— (a) Subject to Article 4 hereof, no person shall use, drive or cause or permit to be driven any goods vehicle exceeding 18 tonnes maximum gross weight in any restricted street during the prescribed hours.

- (b) In any proceedings relating to paragraph (a) above where it is shown that either:
 - (i) A person was the registered keeper of a vehicle at any date; or
 - (ii) A person was a hirer or hire purchaser or lessee or conditional purchaser or owner of a vehicle at any date

it shall be presumed that that person was the user of the vehicle at that date unless that person shows on the balance of probabilities that he was not the user of the said vehicle at the said date and for the avoidance of doubt the existence or otherwise of any such agreement as mentioned in (ii) above shall not of itself mean that the registered keeper is not also a user of that vehicle.

4. Nothing in Article 3 of this Order shall apply:—

- (a) in relation to any goods vehicle being driven by any person in a restricted street during the prescribed hours in respect of which a permission has been granted by the Council pursuant to Articles 5 and 6 below provided that:—
 - (ii) any conditions subject to which the permission is granted are complied with; or
- (b) to any vehicle whose use on roads is authorised by the Motor Vehicles (Authorisation of Special Types) General Order 1979 provided that all conditions subject to which its use is authorised are complied with; or
- (c) to any vehicle being used for fire brigade, ambulance or police purposes; or
- (d) to any vehicle to which paragraph (c) above does not apply and which or whose load is required for the purposes of dealing with any actual or apprehended emergency affecting the safety of persons or property, or
- (e) to anything done with the permission or at the direction of a police constable in uniform or to any vehicle whose use on roads is authorised by the Commissioner of Police of the Metropolis within the Metropolitan Police District or by or on behalf of the Commissioner of Police for the City of London within the City of London; or
- (f) to any person who causes any vehicle to proceed in any restricted street or length thereof in accordance with any prohibition, restriction or requirement indicated by traffic signs placed pursuant to Section 66 or Section 67 of the Road Traffic Regulation Act 1984.

5. Subject to Articles 6 and 7 below, the Council upon application being made to them in the form hereinafter provided may, having regard to:

- (i) its duty to secure the expeditious and safe movement of traffic so far as is practicable having regard to:
 - (a) the desirability of securing and maintaining reasonable access to premises;
 - (b) the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restriction the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
 - (c) the importance of facilitating the passage of public service vehicles and or securing the safety and convenience of persons using or desiring to use such vehicles;
 - (d) any other matters appearing to the Council to be relevant; and
 - (ii) such lawful considerations of policy as may be set out in a policy statement
- grant a permission to enable a vehicle exceeding 18 tonnes maximum gross weight to be driven in any restricted street during the prescribed hours.

- 6.—
- (1) Such persons as may be within a class provided for in a policy statement may apply to the Council for the grant of a permission referred to in Article 5 above and any such application shall be made on a form issued by and obtainable from the Council and shall include the particulars and information required by such form to be supplied.
 - (2) On receipt of an application duly made under this provision the Council, upon being satisfied that a permission should be granted to the applicant, shall record that permission and notify the applicant accordingly.
 - (3) The notification referred to in Article 6(2) above shall be a written schedule in such form as may from time to time be prescribed by the Council and shall include the following:
 - (a) the registration mark of the vehicle in respect of which the permission has been granted;

- (b) the duration of the permission and the expiry date;
 - (c) the conditions to which the permission is subject.
- (4) If it appears to the Council that the vehicle in respect of which a permission has been granted has not been used in accordance with any condition to which the grant of the permission was made subject, the following provisions shall apply:–
- (a) the Council may by notice in writing served on the holder of a permission inform the holder that the Council is considering the revocation of the permission but, before deciding whether or not to revoke it, the Council will take into consideration any representations received by them from the holder within twenty-one days of the notice;
 - (b) at the expiration of the said twenty-one days the Council may, after considering any representations received from the holder, decide to revoke the permission.
 - (c) the Council shall thereupon serve notice on the holder informing him that the permission has been revoked.
 - (d) any notice required to be served under the provisions of this paragraph may be served by recorded delivery service on the holder at the address shown by the holder on the application form for a permission or at the address most recently notified by the holder to the Council or at the holder's last place of business.
7. The Council may grant a permission either unconditionally or subject to such lawful conditions as the Council may think fit.

GREATER LONDON COUNCIL

TRAFFIC MANAGEMENT ORDER

1985 No. 343

The Greater London (Restriction of Goods Vehicles) Traffic Order 1985

Made 15 July 1985

Coming into operation 16 December 1985

As amended to [DATE][2019] by 10 Amendment Orders

The Greater London Council (hereinafter called 'the Council')¹, with the authority and consent of Transport for London (as the traffic authority for GLA Roads and GLA Side Roads in Greater London), and after consulting Transport for London, the Commissioner of City of London Police, the Commissioner of Police of the Metropolis, the Common Council of the City of London, and the Councils of all the London Boroughs, in exercise of the powers conferred by section 6 of the Road Traffic Regulation Act 1984, and of all other powers thereunto enabling, makes the following Order:-

1. This Order shall come into operation on 16 December 1985 and may be cited as the Greater London (Restriction of Goods Vehicles) Traffic Order 1985.

2.– (1) In this Order:-

“Blackwall Tunnel Northern Approach” has the same meaning as in the Tower Hamlets (Prescribed Routes) (No. 5) Traffic Order 1979;

“East Cross Route” has the same meaning as in the Hackney and Tower Hamlets (Various Prohibitions and Restrictions) (No. 1) Traffic Order 1979;

“Enactment” means any enactment, whether public, general or local, and includes any order, byelaw, rule, regulation, scheme or other instrument having effect by virtue of an enactment and any reference in this Order to any enactment shall be construed as a reference to that enactment as amended, applied, consolidated, re-enacted by or as having effect by virtue of any subsequent enactment;

“Excluded Route Network” means any restricted street or length of such a street specified in the Schedule to this Order;

¹ See the Explanatory Note at the end of the Order as to how the London Councils Transport and Environment Committee operates Greater London (Restriction of Goods Vehicles) Traffic Order 1985 since the abolition of the Greater London Council which originally made it.

"Highway maintainable at the public expense" has the same meaning as in section 329(1) of the Highways Act 1980;

"HGV Safety Permit" means a permit granted by or on behalf of the Council under the provisions of Articles 5 or 6 hereof which exempts a vehicle or a class of vehicles from the prohibition imposed by Article 3 (a) (i) of this Order;

"London Lorry Control Scheme (LLCS) Permit" means a permit granted by or on behalf of the Council under the provisions of Articles 5 or 6 hereof which exempts a vehicle or a class of vehicles from the prohibition imposed by Article 3 (a) (ii) of this Order;

~~"Permit Permission" (unless otherwise stated) refers to a HGV Safety Permit and/ or a LLCS Permit means a permission granted by or on behalf of the Council under the provisions of Articles 5 or 6 hereof which exempts a vehicle from the prohibition imposed by this Order;~~

"prescribed hours" means the times

- i) between midnight and 7.00am and between 9.00pm and midnight on Mondays to Fridays inclusive;
- ii) between midnight and 7.00am and between 1.00pm and midnight on Saturdays; and
- iii) at any time on Sundays;

"restricted street" means any highway maintainable at the public expense or length of such highway in Greater London ~~not being a street or length of a street specified in the Schedule to this Order~~ (whether or not the highway is a GLA Road or a GLA Side Road as defined by section 142(1) of the Road Traffic Regulation Act 1984);

"Goods Vehicles" and "Maximum Gross Weight" have the same meaning as in the Traffic Signs Regulations and General Directions 1984 2016;

- (2) Any reference in this Order to a policy statement shall be construed as a reference to a statement published by or on behalf of the Council of their policy on the granting of HGV Safety Permits and/ or LLCS Permits ~~permission~~, being the policy which applies at the time when they are considering the grant of such a ~~permission~~ permit under the provisions of this Order (and different policy statements may be approved as regards each type of permit).

(2A) Any reference in this Order to a class of goods vehicles is a reference to a class defined or described by reference to any characteristics of the vehicles or to any other circumstances whatsoever.

(2B) Any permit, permit-conditions, policy statement, application form or other record or document referred to in Articles 5 to 7 of this Order may be in hardcopy or electronic form and may be published on the internet on a website authorised for that purpose.

2(C) Any reference to an address (including business address) of any applicant for or holder of a permit includes any email address supplied by that person.

- (3) The prohibitions imposed by this Order are in addition to and not in derogation of any restriction, prohibition or requirement imposed by any other enactment and any exception or exemption is without prejudice to the provisions of any other enactment.

- 3.– (a) Subject to Article 4 hereof, no person shall use, drive or cause or permit to be driven any goods vehicle -
- (i) exceeding 12 tonnes maximum gross weight in any restricted street at any time from 26 October 2020; or
 - (ii) exceeding 18 tonnes maximum gross weight in any restricted street not part of the Excluded Route Network during the prescribed hours.
- (b) In any proceedings relating to paragraph (a) above where it is shown that either:
- (i) A person was the registered keeper of a vehicle at any date; or
 - (ii) A person was a hirer or hire purchaser or lessee or conditional purchaser or owner of a vehicle at any date

it shall be presumed that that person was the user of the vehicle at that date unless that person shows on the balance of probabilities that he was not the user of the said vehicle at the said date and for the avoidance of doubt the existence or otherwise of any such agreement as mentioned in (ii) above shall not of itself mean that the registered keeper is not also a user of that vehicle.

4. Nothing in Article 3 of this Order shall apply:–

- (a) in relation to any goods vehicle being driven by any person in a restricted street ~~during the prescribed hours~~ in respect of which a permit ~~permission~~ has been granted by the Council pursuant to Articles 5 and 6 below provided that:–
 - (ii) any conditions subject to which the permit ~~permission~~ is granted are complied with; or
- (b) to any vehicle whose use on roads is authorised by the Motor Vehicles (Authorisation of Special Types) General Order 1979 provided that all conditions subject to which its use is authorised are complied with; or
- (c) to any vehicle being used for fire brigade, ambulance or police purposes; or
- (d) to any vehicle to which paragraph (c) above does not apply and which or whose load is required for the purposes of dealing with any actual or apprehended emergency affecting the safety of persons or property, or
- (e) to anything done with the permission or at the direction of a police constable in uniform or to any vehicle whose use on roads is authorised by the Commissioner of Police of the Metropolis within the Metropolitan Police District or by or on behalf of the Commissioner of Police for the City of London within the City of London; or
- (f) to any person who causes any vehicle to proceed in any restricted street or length thereof in accordance with any prohibition, restriction or requirement indicated by traffic signs placed pursuant to Section 66 or Section 67 of the Road Traffic Regulation Act 1984

(g) where the Council otherwise grant a general or specific exemption.

5. Subject to Articles 6 and 7 below, the Council upon application being made to them in the form hereinafter provided or otherwise, may, having regard to:

(i) ~~it's~~ the duty to secure the expeditious convenient and safe movement of vehicular and other traffic (including pedestrians) so far as is practicable having regard to:

- (a) the desirability of securing and maintaining reasonable access to premises;
- (b) the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restriction the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
- (c) the importance of facilitating the passage of public service vehicles and or securing the safety and convenience of persons using or desiring to use such vehicles;

(d) any other matters appearing to the Council to be relevant; and

(ii) such lawful considerations of policy as may be set out in a policy statement;

grant a HGV Safety Permit and/ or a LLCS Permit (as appropriate) ~~permission~~ to enable a vehicle or a class of vehicles ~~exceeding 18 tonnes maximum gross weight~~ to be driven in any restricted street ~~during the prescribed hours~~ without contravention (as applicable) of the prohibitions imposed under Articles 3(a)(i) and 3(a)(ii) above.

6.– (1) Such persons as may be within a class provided for in a policy statement may apply to the Council for the grant of a HGV Safety Permit and/ or a LLCS Permit (as appropriate) ~~permission~~ referred to in Article 5 above and any such application shall be made on a form issued by and obtainable from the Council and shall include the particulars and information required by such form to be supplied.

(2) On receipt of an application duly made under this provision the Council, upon being satisfied that a permit ~~permission~~ should be granted to the applicant, shall record that permit ~~permission~~ and notify the applicant accordingly.

(3) The notification referred to in Article 6(2) above shall be a written schedule in such form as may from time to time be prescribed by the Council and shall include the following:

- (a) the type of permit, the registration mark of the vehicle in respect of which the permit ~~permission~~ has been granted;
- (b) the duration of the permit ~~permission~~ and the expiry date;
- (c) the conditions to which the permit ~~permission~~ is subject (if any).

(4) If it appears to the Council that the vehicle in respect of which a permit (being a HGV Safety Permit and/ or a LLCS Permit) ~~permission~~ has been granted has not been used in accordance with any condition to which the grant of the permit ~~permission~~ was made subject, the following provisions shall apply:–

- (a) the Council may by notice in writing served on the holder of a permit ~~permission~~ inform the holder that they are ~~is~~ considering the suspension (including the length of

the proposed suspension) or revocation of the permit(s) ~~permission~~ but, before deciding whether or not to suspend or revoke it, they will take into consideration any representations received by them from the holder within twenty-one days of the notice;

- (b) at the expiration of the said twenty-one days the Council may, after considering any representations received from the holder, decide to suspend or revoke the permit ~~permission~~.
- (c) the Council shall thereupon serve notice on the holder informing him that the permit ~~permission~~ has been suspended for such period set out in the notice or has been revoked.
- (d) notwithstanding sub-paragraphs (a) to (c) above, if the Council are of the opinion that the interests of public safety require that the suspension of a HGV Safety Permit and/or LLCS Permit is to have immediate effect, and they include a statement of that opinion and the reasons for it in the notice of suspension, then the suspension of the permit shall take effect when the notice is served on the holder of the permit.
- (e) any notice required to be served under the provisions of this paragraph may be served by recorded delivery service on the holder at the address shown by the holder on the application form for a permit ~~permission~~ or at the address most recently notified by the holder to the Council or at the holder's last place of business.

7. The Council may grant a permit ~~permission~~ either unconditionally or subject to such lawful conditions as the Council may think fit.

SCHEDULE

Excluded Route Network

[INSERT]

EXPLANATORY NOTE

The Greater London Council ("the GLC") made the Greater London (Restriction of Goods Vehicles) Traffic Order 1985 ("the 1985 Order") under section 6 of the Road Traffic Regulation Act 1984 ("the 1984 Act") for the purposes of establishing the London Lorry Control Scheme in Greater London.

The GLC was abolished on 31 March 1986 and its functions under section 6 of the 1984 Act were exercisable from 1 April 1986 by each of the thirty-two London Borough Councils ("the 32 Boroughs") and the Common Council of the City of London ("the City of London") as individual traffic authorities under that Act in respect of roads within their areas.

From 3 July 2000 Transport for London ("TfL") became the traffic authority for GLA Roads and GLA Side Roads in Greater London and the 32 Boroughs and the City of London remained the traffic authorities for all other roads within their areas (other than trunk roads for which the Secretary of State for Transport is the traffic authority) in accordance with section 121A of the 1984 Act.

The Transport and Environment Council of London Councils ("the Committee") is a joint Council of the 32 Boroughs, the City of London and TfL (collectively called "the Traffic Authorities"), which have agreed and authorised the Committee to discharge their functions under section 6 of the 1984 Act in respect of the 1985 Order (as amended). In exercise of the powers delegated to it by the Traffic Authorities the Committee may from time to time amend the 1985 Order under section 6 of the 1984 Act.

Appendix B Statement of Reasons

Road Traffic Regulation Act 1984, section 6

The Greater London (Restriction of Goods Vehicles) Traffic Order 1985 (Amendment) Order 2019

London HGV Safety Permit Scheme

DRAFT STATEMENT OF REASONS

The London Councils' Transport and Environment Committee ("the Committee") has resolved to make an order amending the Greater London (Restriction of Goods Vehicles) Traffic Order 1985 ("the Order") for the purpose of improving the safety of vulnerable road users through the implementation of the London HGV Safety Permit Scheme ("the Scheme").

The Scheme, implemented by the Order, will require all heavy goods vehicles ("HGVs") over 12 tonnes to be issued with an HGV Safety Permit ("Permit") in order to drive on any road in Greater London after 26 October 2020. Permits will be granted according to a rating system based on a Direct Vision Standard ("DVS").

The DVS has been developed in order to address the high number of collisions in London involving HGVs and vulnerable road users (predominantly pedestrians, cyclists and motorcyclists); it measures a driver's direct view through the windows of an HGV cab. This is communicated as a star rating from zero (poor) to five (excellent) which indicates the level of risk to vulnerable road users near to the vehicle. The appropriate minimum acceptable DVS rating to operate a HGV over 12 tonnes in London, having regard to the potential dangers posed to vulnerable road users, is one star (from 26 October 2020) and three stars (from 26 October 2024).

Permits will be granted for HGVs to which the Order applies on application. Vehicles not meeting the minimum DVS star rating or which are un-rated under the DVS will be granted a Permit that is subject to the "Safe System Conditions".

The Safe Systems Conditions that will apply until 26 October 2024 to HGVs not meeting the minimum one star rating, or which are un-rated under the DVS, will require the fitting of the following additional measures to increase the vehicle's safety as regards vulnerable road users: (i) the use of indirect vision equipment (cameras, mirrors and sensors), (ii) the use of warning measures (audible and pictorial) and (iii) the fitting of appropriate side under-run protection (where practicable, sideguards). Driver training is recommended and will be promoted, but will not be mandatory. The measures to be required by the Safe Systems Conditions that will apply to HGVs not meeting the minimum three star rating, or which are unrated under the DVS, after 26 October 2024 will form part of a review and further consultation in due course.

Certain types of HGVs, such as emergency service vehicles and road sweepers, will be exempt from the need for a Permit and/or from certain of the Safe Systems Conditions by virtue of Article 4 of the Order and an exemptions policy. A policy statement has been published with the proposed amended Order.

Applications for Permits will be free. Contraventions of the Order or of the conditions of a Permit will be enforced by issuing civil penalty charge notices.

The documents that are published with the Order are:

- Consultation document on the final proposals for the London HGV Safety Permit Scheme (Phase 2c)
- Draft policy statement, including exemptions policy, for granting HGV Safety Permits (combined with the policy for granting permits under the existing London Lorry Control Scheme);
- Draft HGV Safety Permit conditions (standard conditions and Safe Systems Conditions);
- An Integrated Impact Assessment of the Phase 2c consultation proposals;
- Draft guidance note to operators on the permitting process;
- Draft enforcement policy;
- Response to/feedback from the Phase 2b consultation on the Scheme
- Copy of the Greater London (Restriction of Goods Vehicles) Traffic Order 1985 (Amendment) Order 2019;
- Map of roads affected by the above Order
- Copy of the Greater London (Restriction of Goods Vehicles) Traffic Order 1985 (as if amended by the above Order without modification).

The Committee promotes the amendments to the Order in accordance with section 6(1) of the Road Traffic Regulation Act 1984 (“the 1984 Act”) having regard to the matters specified in section 122(2) of the 1984 Act and section 39(3) of the Road Traffic Act 1988.

In particular, the DVS scheme is promoted to avoid danger to persons or other traffic using the roads in Greater London or for preventing the likelihood of such danger arising. London has a disproportionate problem with collisions between HGVs and vulnerable road users. The amendments to the Order will prevent or reduce the likelihood of accidents occurring where vehicles have a low degree of direct vision. Evidence indicates this factor has a material impact on the driver’s awareness of the presence of vulnerable road users and the reaction time available to avoid collisions. The Scheme will also contribute to the Mayor of London’s “Vision Zero” aim to eliminate deaths and serious injuries from London’s streets by 2041.

The proposals have been the subject of three periods of pre-Order consultation: phase 1 (January-April 2017), phase 2a (November 2017-January 2018) and phase 2b (January-February 2019). In approving the amendments to the Order and the associated documents, the Committee has had regard to the responses received.

In particular, the Committee considers that the proposals are a proportionate way of addressing a serious issue that arises on London’s roads. The additional cost to drivers and businesses is anticipated to be low. The permitting process will be accessible, transparent and free to use. Overall, the DVS scheme will make London’s streets safer and more attractive places to be, including for cyclists and other vulnerable road users.

LONDON COUNCILS TRANSPORT AND ENVIRONMENT COMMITTEE

LONDON LORRY CONTROL SCHEME

AND

LONDON HGV SAFETY STANDARD PERMIT SCHEME

POLICY STATEMENT ON THE ISSUE OF PERMITS

1. INTRODUCTION

- 1.1 The following explanatory statement of policy has been approved by London Councils Transport and Environment Committee ("the Committee") to provide guidance for operators of vehicles affected by the Greater London (Restriction of Goods Vehicles) Traffic Order 1985 ("the Traffic Order"). The Traffic Order establishes the London Lorry Control Scheme ("LLCS") which has been in operation since 1985. It was amended in [DATE] 2019 to introduce the requirements of the London HGV Safety Standard Permit Scheme. Both schemes are described below. This Policy Statement covers both Schemes.

London Lorry Control Scheme Permits

- 1.2 The intention of the London Lorry Control Scheme is to improve the environment for Londoners by reducing disturbance from heavy goods vehicles (HGVs) at night-time and weekends. This improvement will be achieved in two ways:
- by preventing lorries (HGVs) **over 18 tonnes (gvw)** from travelling on restricted roads during the controlled hours¹ unless they have a legitimate business which requires them to be there;
 - by ensuring that lorries which are on those roads cause as little disturbance as possible by requiring them to have a LLCS Permit with conditions ("LLCS Conditions") that require they are operated quietly and in a manner that reduces their detrimental environmental impact.
- 1.3 All roads in Greater London are now "restricted roads" for the purposes of the LLCS and an "excluded road" is a road to which the LLCS restrictions do not apply. The "Excluded Route Network" (ERN) is the network of excluded roads, as set out in the Schedule to the Traffic Order.
- 1.4 LLCS Permits are administered by the London Councils Lorry Control Administration Section.

London HGV Safety Permits

- 1.5 The intention of the HGV Safety Permit ("HSP") Scheme is to reduce the number of people killed and seriously injured on London's roads by improving the safety of HGVs **over 12 tonnes (gvw)** operating in Greater London. Using a star system, the Direct Vision Standard (DVS) rates HGVs from zero (lowest) to five (highest) stars, based on how much a driver can see directly through their HGV cab windows in relation to vulnerable road users, such as cyclists and pedestrians in the area of greatest collision risk around the vehicle.
- 1.6 This highway safety improvement will be achieved by:
- requiring all HGVs exceeding 12 tonnes to obtain a permit ("HGV Safety Permit") to operate in Greater London from 28 October 2020;
 - granting HGV Safety Permits to all vehicles rated One Star or above under DVS; and
 - imposing Safe System Conditions on the HGV Safety Permits of those vehicles rated Zero Star or unrated under the DVS. These Safe System Conditions require the vehicle to be fitted with additional equipment to improve its safety for other road users.
- 1.7 All roads in Greater London are covered by the HSP Scheme as "restricted roads". No roads are excluded and so there is no ERN where this Scheme is concerned.

¹ The "Controlled Hours" for the LLCS Scheme are: (1) **Mondays to Fridays:** midnight and 7.00am and between 9.00pm and midnight (2) **Saturdays:** between midnight and 7.00am and between 1.00pm and midnight and (3) **Sundays:** all day.

- 1.8 HGV Safety Permits are administered by [such body appointed by the Committee from time to time].

Interaction between the two schemes

- 1.9 All HGVs exceeding 12 tonnes (gvw) require a HGV Safety Permit to operate on any road in Greater London issued subject to "HGV Safety Permit Conditions", including the Safe System Conditions where applicable.
- 1.10 All HGVs rated Zero Star, or which are un-rated under the DVS, must operate in accordance with the Safe System Conditions and fit additional safety equipment; those HGVs rated One Star and above can be operated without such additional equipment.
- 1.11 All HGVs exceeding 18 tonnes (gvw) intending to drive on roads off the ERN during controlled hours require a LLCS Permit, issued subject to LLCS Conditions.
- 1.12 In this document a "Permit" refers to either a LLCS Permit or HGV Safety Permit, as appropriate, and "Conditions" to the LLCS Conditions or HGV Safety Permit Conditions.

2. PERMIT APPLICATIONS

- 2.1 An applicant may apply for a LLCS Permit and/or HGV Safety Permit for a vehicle which he or she proposes to use in circumstances affected by either Scheme and which is or will be under his or her control. If the applicant is not the owner of the vehicle, he or she must show that he or she is able ~~has the consent of the owner~~ to make the application and is able to ensure that Conditions attached to any permit that may be issued are complied with.

3. CONSIDERATIONS FOR THE ISSUE OF LLCS PERMITS AND HGV SAFETY PERMITS

- 3.1 The following matters will be taken into account in considering an application for a LLCS Permit or HGV Safety Permit (and the imposition of any Conditions attached thereto).
- 3.1.1 The statutory duties on Transport for London and London Boroughs as traffic authorities under the **Road Traffic Regulation Act 1984, Section 122 (1) and (2)** to secure the expeditious, safe and convenient movement of vehicular and other traffic including pedestrians, so far as is practicable, having regard to:
- the need for securing and maintaining reasonable access to premises;
 - the effect of the use of roads by heavy commercial vehicles on the amenities of any locality concerned;
 - the national air quality strategy;
 - the need to assist public transport and its passengers;
- 3.1.3 **Road Traffic Regulation Act 1984, Section 6:** the purposes of controlling or regulating vehicular traffic as mentioned in section 6(1) of that Act, in particular those relating to highway safety and air quality mentioned in section 1 (1) (a), (c), (d) and (g):
- avoiding danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising;
 - facilitating the passage on the road or any other road of any class of traffic (including pedestrians);
 - preventing the use of the road by vehicular traffic of a kind which, or its use by vehicular traffic in a manner which, is unsuitable having regard to the existing character of the road or adjoining property;
 - the purposes specified in paragraphs (a) to (c) of subsection (1) of section 87 of the Environment Act 1995 (air quality); and
- 3.1.5 **Road Traffic Act 1988, Section 39(3):** the duty, in the light of studies into accidents arising out of the use of vehicles, to take such measures, including those taken in the exercise of its powers for controlling, protecting or assisting the movement of traffic on roads, as appears to it to be appropriate to prevent accidents;
- 3.1.6 Any other matters appearing relevant.

4. POLICIES ON GRANTING LLCS PERMITS

- 4.1 In particular (but without prejudice to above the generality of the above) the following considerations will be taken into account when deciding whether to grant an application for a LLCS Permit:
- the circumstances of the applicant's needs for a LLCS Permit;

- the environmental circumstances of the roads on which the vehicle is to be used and the extent to which the ERN, i.e. roads with no night-time and weekend controls, can satisfy the applicant's requirements;
 - the financial, commercial, professional, industrial, employment and other consequences likely to result from the issue or refusal of a Permit;
 - the characteristics of the vehicles;
 - any special efforts made to reduce the environmental impact of the applicant's vehicle;
 - the practicability of and time required for adapting the applicant's operations;
 - the possibility of using other less environmentally damaging modes of transport
- 4.2 The following explanation (including some examples to illustrate some of the considerations) is intended to provide further guidance for operators of vehicles which are affected by the LLCS.
- 4.3 The most important criterion in deciding whether or not to grant a LLCS Permit is the applicant's need for it. First and foremost it is the Committee's policy to ensure that only vehicles undertaking necessary business in London should be permitted to use restricted roads.
- 4.4 The environmental circumstances of a road are relevant, for example where premises are linked to the ERN by a road which has no residential development, and which has not been identified by the Committee as an excluded road. Permits may be issued until the road concerned can conveniently be included in a supplementary order.
- 4.5 Another relevant consideration is when the continued viability of a firm may be affected by the LLCS. Permits may be granted while further consideration is given to finding an appropriate solution on a more permanent basis.
- 4.6 Certain companies already display a high degree of environmental awareness, involving such matters as driver training, or the use of vehicles which make less environmental impact. Matters such as these will be given due consideration. In other cases it would be reasonable to expect applicants to modify existing vehicles or choose more environmentally suitable vehicles when new purchases are made. Guidance will be available to applicants when they apply for exemption Permits.
- 4.7 It is the Committee's policy to seek the highest legally specifiable standards for vehicles in respect of which LLCS Permits are issued to ensure that they have the minimum adverse effect on the environment.
- 4.8 Where LLCS Condition 5 applies to an LLCS Permit, vehicles must minimise their use of roads away from the ERN unless a special routing agreement is made with LLCS Administration Section. Such a routing agreement will only be made if:
- the applicant, in proposing a route, can demonstrate that the alternative route results in reduced overall environmental impact, particularly in terms of noise effect on residential properties adjacent to the route; and
 - the holder is granted a LLCS Permit lasting at least three months.
- 4.9 Each case will be considered on its merits.
- 4.10 LLCS Permits will be specific to an applicant and a vehicle and will not be transferable to any other person or vehicle.

POLICIES ON GRANTING HGV SAFETY PERMITS

5. The primary purpose of the HGV Safety Permit Scheme is to increase the safety of vehicles and reduce the chances of collisions with vulnerable road users by encouraging the use of vehicles with increased driver direct vision. The Direct Vision Standard will identify those vehicles with unacceptably poor levels of direct vision to operate safely in Greater London and require those below a minimum acceptable rating to fit additional safety equipment to maximise safety as regards vulnerable road users.
- From 26 October 2020 it will be a requirement for all HGVs exceeding 12 tonnes entering Greater London to have been granted a HGV Safety Permit.
 - Taking into account (amongst other matters) the current composition of the 12 tonnes+ HGV fleet in Greater London, the supply of "good" rated vehicles, the economic and operational impacts on HGV operators, the introduction by manufacturers of good rated HGVs into the supply chain, it is considered an initial minimum standard of One Star is appropriate for the first four years of the Scheme.
 - Those vehicles rated One Star DVS until 26 October 2024 are considered "good" in terms of their DVS rating.
 - Taking those matters into account the minimum standard will increase to Three Stars from 26 October 2024.

- Vehicles not meeting the above minimum DVS requirements must mitigate the potential harm they pose to vulnerable road users by fitting the additional safety equipment detailed in the Safe System Conditions. It is a legal requirement to comply with the Safe System Conditions.
- The Safe System Conditions will be revised and consulted ahead of 2024 in order to consider any new appropriate technological developments
- Other conditions may be imposed on any HGV of irrespective the vehicle's DVS rating, as considered appropriate.

5.1 The Committee has determined that the appropriate minimum acceptable DVS threshold to operate a 12 tonnes or over HGV safely on roads in Greater London ("minimum DVS rating") having regard to the potential dangers posed to vulnerable road users is:

- One Star until 26 October 2024; and
- Three Stars from 26 October 2024.

5.2 Where an application is made for a HGV Safety Permit, a permit will be granted to:

- an HGV meeting the minimum DVS star rating, without the Safe System Conditions being attached;
- a vehicle not meeting the minimum DVS rating or which is un-rated will only be granted a HGV Safety Permit subject to the Safe System Conditions being attached.

5.3 HGV Safety Permits will be specific to an applicant and a vehicle and will not be transferable to any other person or vehicle.

6. DURATION OF PERMITS

6.1 The duration of LLCS Permits may be for such a period as seems reasonable in all the relevant circumstances. All LLCS Permits will automatically cease to be valid once the particular vehicle is no longer in the ownership of or under the control of the applicant and the applicant must inform the LLCS Administration Section of this immediately in writing.

6.2 The duration of a HGV Safety Permit will depend on whether the vehicle met the minimum DVS requirement or if it was granted subject to the Safe System Conditions:

- The Permits of Vehicles rated Zero Star or which are un-rated under the DVS (granted subject to the Safe System Conditions) will expire at the end of 27 October 2024;
- The Permits of Vehicles rated One or Two Star will expire at the end of 27 October 2024; and
- The Permits of Vehicles rated Three, Four or Five Star will expire at the end of 27 October 2030 or ten years after the application date if granted later than 28 October 2020 (whichever is the later).

7. APPEALS

7.1 If an applicant is refused a Permit or it is granted with Conditions unacceptable to the applicant, he or she is entitled to appeal. Similarly, users whose Permits are revoked or suspended may appeal.

7.2 Appeals regarding LLCS Permits must be made through the official London Councils complaints procedure. A temporary short-term exemption LLCS Permit may be issued, if considered appropriate, pending the outcome of an appeal against a refusal to issue or the revocation of the permit

7.3 Appeals regarding HGV Safety Permits must be made through the official complaints procedure of the body appointed by the Committee to administer the HGV Safety Permit Scheme.

8. IMPLEMENTATION

8.1 It is expected that all applicants will use their best endeavours to implement not only the letter but also the spirit of the Traffic Order and the Conditions attached to Permits. To assist in ensuring that the Order and Conditions are implemented London Councils and TfL will employ officers whose duty it will be to advise, assist and check on the operation of vehicles. All applicants for Permits are expected to co-operate with these officers in the reasonable exercise of their duties and, if necessary, to comply with Conditions attached to the LLCS or HGV Safety Permit.

8.2 Failure to comply with Permit Conditions may result in the revocation or suspension of that Permit; suspension may be immediate where there is a danger to public safety. The applicant's past record of compliance generally will be a relevant consideration when future applications are considered.

GREATER LONDON (RESTRICTION OF GOODS VEHICLES) TRAFFIC ORDER 1985

LONDON HGV SAFETY PERMIT SCHEME

CONDITIONS ATTACHED A HGV SAFETY PERMIT

The following conditions were approved on [DATE] by London Councils Transport & Environment Committee to apply to all HGV Safety Permits granted under article 4(a) of the London HGV Safety Permit Scheme provisions of the Greater London (Restriction of Goods Vehicles) Traffic Order 1985 (“Traffic Order”, as amended).

Notes:

- A. An HGV Safety Permit is required before an HGV exceeding 12 tonnes (gvw) (“the Vehicle”) is operated¹ on any public road² in Greater London
- B. The HGV Safety Permit of any Vehicle not meeting the “minimum Direct Vision Standard (DVS) requirement” star rating (One Star or un-rated until 27 October 2024 and Three Stars after that date) or which is un-rated under the DVS will be granted subject to the Safe System Conditions set out in Condition 8 below. (The measures included in the Safe System will be reviewed in 2024; any new measures to be included in the System will be confirmed prior to 28 October 2024 following consultation.)
- C. In these Conditions, unless stated otherwise, the word “applicant” shall be taken to mean both (1) the applicant for the HGV Safety Permit and, if different from the applicant, (2) the person to whom the HGV Safety Permit is granted or driver of the Vehicle in respect of which a HGV Safety Permit is granted.
- D. An HGV Safety Permit is valid under the Traffic Order³ for all public roads in Greater London for the duration of the Permit.
- E. Failure to comply with these Conditions may result in the revocation or suspension of the HGV Safety Permit. Suspension may be immediate if it is considered in the interests of public safety. It is a contravention of the Traffic Order to operate the Vehicle on any public road in Greater London while its HGV Safety Permit is suspended.
- F. It is a contravention of the Traffic Order to either (1) fail to obtain a HGV Safety Permit for a Vehicle prior to operating on any public road in Greater London, including when the Permit has been suspended or (2) operate the Vehicle in contravention of these Conditions (including the Safe System Conditions where they apply). A Penalty Charge Notice may be issued to operators/ hauliers for £550 and £130 for drivers (reduced by half if paid within 14 days).

General Conditions applying to all HGV Safety Permits

- 1. The applicant shall operate the vehicle for which the HGV Safety Permit is issued in compliance with the requirements/ measures set out in these Conditions.

¹ Article 3(a) of the Traffic Order refers to the Vehicle being “used or driven (or caused or permitted to be driven”.

² This is any highway or length of highway maintainable at public expense, in Greater London; referred to as the “restricted roads” in the Traffic Order

³ Articles 3(a)(i) and 4(1) of the Traffic Order.

2. The applicant and the driver of the Vehicle shall co-operate in assisting any authorised officer of [London Councils and/ or of Transport for London⁴] in the reasonable exercise of his/her duties in checking whether the vehicle has been modified and/or is being operated in accordance with the Conditions.
3. An applicant shall bring to the attention of the driver of the Vehicle all Conditions subject to which this HGV Safety Permit has been issued. However, this does not remove the applicant's responsibility for compliance with these Conditions.
4. The HGV Safety Permit is granted to the applicant for the specified vehicle and is not transferable. The permit will automatically cease to be valid if the vehicle ceases to be under the control of the applicant and it shall then be the duty of the applicant to inform Transport for London of this immediately in writing to **[insert appropriate email address]**.
5. The duration of a HGV Safety Permit will depend on whether the vehicle met the minimum DVS requirement or if it was granted subject to the Safe System Conditions:
 - The Permits of Vehicles rated Zero Star or un-rated under the DVS (subject to the Safe System Conditions) will expire at the end of 27 October 2024;
 - The Permits of Vehicles rated One or Two Star will expire at the end of 27 October 2024; and
 - The Permits of Vehicles rated Three, Four or Five Star will expire at the end of 27 October 2030 or ten years after the application date if granted later than 28 October 2020 (whichever is the later).
6. No vehicle may be operated on any public road in Greater London during any time while its HGV Safety Permit is suspended.
7. The applicant shall ensure that all modifications, and any existing features fitted to the Vehicle to reduce its environmental impact and/ or increase its potential safety as regards other road users, including those required by Condition 8 below are:
 - maintained and kept in proper working order at all times; and
 - operated properly and appropriately in accordance with manufacturers' instructions.

Safe System Conditions where a vehicle does not meet the minimum DVS star rating

8. The applicant shall carry out and complete modifications to the Vehicle so as to comply with the measures set out in the Schedule (Safe System Measures) within the period specified subject to any further conditions, restrictions or limitations or exemptions indicated.

⁴ As appointed by the Committee in due course.

SCHEDULE

SAFE SYSTEM MEASURES

Appendix E: HGV Safety Permit application process

A permit scheme (HGV Safety Permit) allows a vehicle to be assessed for its direct vision performance as part of the permit application process. Permits are also a proportionate, cost effective and practical way of implementing safety improvements (“safe system” measures) on the most potentially dangerous 12 tonnes+ HGVs without operators having to replace vehicles prematurely.

The HGV Safety permit will be free of charge and electronic. Fleet operators of vehicles requiring a permit will be able to apply via an online permit application portal.

Star ratings are unique to the make, model and specific configuration of the vehicle. For this reason, operators must contact¹ their vehicle manufacturer(s) and provide the vehicle chassis number to request a star rating.

The vehicle manufacturer will advise fleet operators of the star rating of the vehicle and at the same time will inform TfL who will add the rating to a database.

If a vehicle manufacturer is unable to provide a rating for a vehicle model operators will still be able to apply for a permit by demonstrating the vehicle has been fitted with a safe system.

Once star ratings have been obtained and safe system requirements met where necessary (zero star or ‘unrated’ vehicles), operators can apply for a HGV Safety Permit for a vehicle, or fleet of vehicles, via TfL’s permit application portal.

¹

Appendix F: Safe System

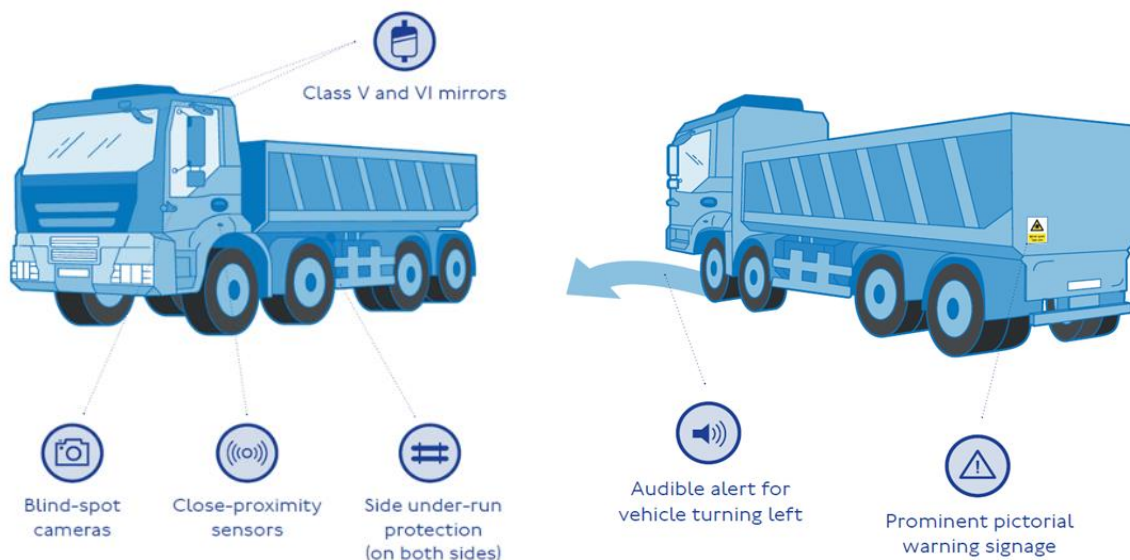
The proposed Safe System is a series of vehicle safety measures which aim to improve the overall safety of an HGV. It will be a condition of the HGV Safety Permit that the measures required by the Safe System are fitted, maintained and kept in proper working order at all times, and operated in accordance with manufacturers' instructions.

Areas covered include:

- Blind spot elimination and minimisation
- Warning of intended manoeuvre
- Minimising physical impact of a hazard
- Driver safety training (highly recommended, but not mandatory)

The Safe System will be reviewed ahead of 2024 to take into account any additional technology or safety equipment not available in 2020.

Contravention of the Safe System requirements may result in suspension (including immediate suspension where public safety concerns) or revocation and the issue of a Penalty Charge Notice against the vehicle operator or driver.



Appendix G: DVS and HGV Safety Permit Scheme - Phase 2C consultation responses

If you have any comments on the final proposals for the HGV Safety Permit Scheme please set them out in the box below. If you wish to object to the Amendment Order please clearly specify your grounds for doing so. - Comments		Responding as
1.	strongly support	A local resident, Employed locally, A visitor to the area, A commuter to the area
2.	At last something is being done. We need to concentrate on mechanical safety and emission safety though.	A local resident
3.	I support them	A local resident A local business owner, Employed locally
4.	I support improving safety for vulnerable road users. Increasing the use of direct vision and safety systems seems like a sensible approach	A local resident
5.	I think lorries should be made safer. I think cyclists should be protected from dangerous drivers of lorries.	A visitor to the area
6.	This will not work, it relies on a false premise that a driver can access all points of vision at all times. with DVS, 6 mirrors, 2 screens and checks over shoulder, looking ahead you give a driver 10 places to look, a driver only has one pair of eyes. and to complete all 10 vision points will take 5 seconds (assuming .5 of a second for a proper focused and effective glance) and if you think the streetscape will remain static through 5 seconds of observation in other views you are mistaken. This is naivety at its worst	Employed locally
7.	I support these proposals. I think it is very important to ensure London is dominated by walking, cycling and public transport rather than by HGVs. Although concerns about cost to operators are mentioned, I think any operator unable to invest in safety deserves to go out of business.	A local resident, Employed locally

Appendix G: DVS and HGV Safety Permit Scheme - Phase 2C consultation responses

8.	<p>I'd like to make you aware that I'm launching a product that enhances the drivers Direct Vision and retrofits to the vast majority of vehicles.</p> <p>I'm working with the universities and TRL (Transport Research Lab) to assess and endorse. I'd appreciate if this information could be passed onto the appropriate person. I've got a great deal of interest from FORS, Clocs, RoSPA , RHA, FTA etc.</p>	A local business owner
9.	No objections to any safety measures	Ex vehicle inspector
10.	Strongly support final proposals.	A commuter to the area
11.	I agree on this scheme. It will not only make our roads safer it'll make people's lives safer.	Not local but interested in the scheme
12.	<p>There should be no exemptions, if a vehicle is to be driven on public roads it should be safe. If its not safe it should not be on the road, is that not the point? Its not ok to injure or kill why is this so hard or tfl to get?</p> <p>As a minimum vehicles must have direct vision if they dont, thats a fundamental fail. Do not allow on the road</p>	A local resident
13.	<p>This is the wrong approach to take in my opinion. The Govt., and TFL need to join up with Tesla or similar companies and introduce fully A.I lorries which require no driver at all. If there is a driver in the cab there will be deaths and injuries period!</p> <p>Also, if you join up with Tesla you guys can make the vehicles electric as well. There will then be no need for costly enforcement.</p> <p>You guys need to do a U turn on this policy before it's to late.</p>	A visitor to the area, A commuter to the area
14.	I object to the whole scheme as it is yet another burden on hauliers which is only necessary because some cyclists are absolute morons and have no idea of the highway code and how to keep themselves safe on the road. They ride around on	Road user

Appendix G: DVS and HGV Safety Permit Scheme - Phase 2C consultation responses

	the roads for no purpose other than 'having fun' and inconveniencing other road users, including pedestrians when the roads are blocked and they decide to use the pavements or don't bother to stop at zebra crossings. When we were kids we were told not to play in the roads but apparently this is now ok if you are a middle aged man with a penchant for lycra.	
15.	The Mineral Products Association supports the proposals set out in the consultation. The proposals are broadly consistent with CLOCS requirements which are well understood in the construction industry and supply chains in London. The process for applying for permits are reasonable and proportionate.	A local resident, Employed locally, A representative of an industry trade association
16.	No Objections	Utility Operator
17.	I believe that the safe system equipment should be standardised and subsidised as the cost varies greatly and most providers only know FORS. also the enforcement officers may not be able to distinguish if specific conditions are met. Also outfitting 23 lorries as I am currently responsible for it represents a significant expense. Could Hauliers currently registered with the London Lorry Control be granted a permit whilst undertaking a scheme that within a specified time frame all lorries on the fleet will be fitted with the safe system. This allows the spreading of the cost and minimises downtime.	Employed locally
18.	SMMT have no further comments to those already provided in our responses to the Phase 2a and 2b consultations.	Trade Association

Appendix G: DVS and HGV Safety Permit Scheme - Phase 2C consultation responses

19.	<p>About us</p> <ul style="list-style-type: none">• Royal Mail takes its safety, health and environmental responsibilities very seriously.• We are proud to deliver the six-days-a-week, one-price-goes-anywhere Universal Service Obligation under the Postal Services Act 2011.• Royal Mail employs 143,000 people in its core UK business; 1 in 192 jobs in the UK is with Royal Mail Group.• We operate a national fleet of c. 48,000 vehicles. This is one of the largest commercial fleets in the UK.• We deliver to every address in the country. This requires driving into the Greater London Authority boundary. <p>Bearing in mind the vital role Royal Mail plays in delivering letters and parcels across Greater London, Royal Mail has three comments on these final proposals:</p> <p>1) Royal Mail is concerned about the lack of specification detail available ahead of 2022. This means we may, unknowingly, purchase non-compliant vehicles given the specification of the Progressive Safe System will not be available until 2022. These measures could therefore negatively affect our fleet planning with the potential for significant, avoidable cost implications.</p> <p>TfL's response to the 2b consultation states "we cannot define the detailed components of this system now. However, any new equipment or technology proposed for the Progressive Safe System must be retrofittable to HGVs, industry recognised and readily available on the market at the time. We have committed to consulting on the Progressive Safe System in 2022."</p> <p>This leaves a very small window to retrofit the required systems. This has been recognised by TfL in Appendix 13 of the consultation when it acknowledges that fleet-owning</p>	A local business owner
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Appendix G: DVS and HGV Safety Permit Scheme - Phase 2C consultation responses

organisations require clear and detailed specification standards before they can confidently invest in the most effective measures to retrofit fleet that does not meet the necessary safety star rating and train drivers.

As an organisation with a large fleet, Royal Mail needs as much lead in time as possible to make the required changes. We ask for more information on TfL's timelines and next steps. We recommend the process is expedited and the specification details are published well in advance of 2022.

2) Royal Mail is not confident from discussions with our suppliers that the market will have the capacity and capability to meet the needs which will result from this policy change. We are also concerned that there is not sufficient capacity in the hire market to meet the needs as our vehicles will be off the road receiving their retrofitting. We will have to use the hire market during this period to ensure we continue to meet our Universal Service Obligations.

Royal Mail recommends that TfL undertake relevant market research – or if already undertaken, publishes the results – to assess the retrofitting and hire market capacities before this new policy comes into force.

3) Royal Mail recommends that once the vehicle is deemed compliant, it should then be compliant for the remainder of its life. The V5 should be updated to ensure this is recognised as compliant to avoid confusion.

Appendix G: DVS and HGV Safety Permit Scheme - Phase 2C consultation responses

20.	<p data-bbox="322 193 680 225">Freight Trade Association</p> <p data-bbox="322 261 2002 325">Direct Vision Standard phase 2c consultation on further Scheme proposals and statutory Traffic Regulation Order – FTA response 23 May 2019 About FTA</p> <p data-bbox="322 362 2029 533">The Freight Transport Association (FTA) is one of Britain’s largest trade associations, and uniquely provides a voice for the entirety of the UK’s logistics sector. Its role, on behalf of over 17,000 members, is to enhance the safety, efficiency and sustainability of freight movement across the supply chain, regardless of transport mode. FTA members operate over 200,000 goods vehicles - almost half the UK fleet - and some one million liveried vans. In addition, they consign over 90 per cent of the freight moved by rail and over 70 per cent of sea and air freight.</p> <p data-bbox="322 533 2002 596">FTA’s mission is to make logistics safer and more efficient. We seek to ensure that our members can supply our towns and cities with the goods they require every day, whilst reducing any social impacts with regard to air pollution and road safety.</p> <p data-bbox="322 633 672 665">Response to consultation</p> <ul data-bbox="322 665 2029 1383" style="list-style-type: none"><li data-bbox="322 665 2029 804">▪ FTA objects in principle to the Amendment of The Greater London (Restriction of Goods Vehicles) Traffic Order 1985 (to extend its scope from the London Lorry Control Scheme to include the HGV safety permit scheme) on the grounds that we do not believe the introduction of a Direct Vision Standard and Safety Permit Scheme is the most effective way of improving road safety. However, if the scheme is to proceed, we do not have specific objections to the amended wording of the TRO.<li data-bbox="322 820 2029 959">▪ FTA supports the Mayor’s ‘Vision-Zero’ approach to fatalities and serious injuries on London’s roads. However, FTA has always been opposed in principle to vehicle design being set at a local level. This as a minimum is the role of national government and should ideally be set by UN or European level bodies. The creation of a Direct Vision Standard will create a niche market for the manufacturers which will increase prices of trucks in London.<li data-bbox="322 975 2029 1114">▪ FTA calls on the Mayor to move away from a narrow focus on direct vision and a safe system which is backed up by inconclusive research and to focus in the short term on vehicle compliance with existing regulation and in the medium to long term on supporting industry and manufacturers in the development and adoption of technological solutions currently underway which could prove to be a step change in this agenda.<li data-bbox="322 1129 2029 1299">▪ Notwithstanding the above position, if the current proposals are pursued, FTA suggests that TfL strongly considers only requiring new vehicles to comply with the HGV Safety Permit System in the first instance with a sensibly deferred timeline for existing vehicles. Operators are already procuring vehicles which will be on the road in 2020 and 2024 and have therefore already purchased cameras, sensors and other safety equipment in good faith without knowing either the star rating for the vehicle or the components that will be accepted as part of the safe system.<li data-bbox="322 1315 2029 1383">▪ Whilst cameras and mirrors clearly provide an alternative to direct vision, audible alarms do not. Given the lack of statistical evidence on the effectiveness of audible alarms and sensors, FTA suggests that the requirements for the fitment of these items are
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	<p>removed from safe system requirement.</p> <ul style="list-style-type: none"> ▪ It should be noted that FTA has been working closely with TfL throughout the development of the Direct Vision Standard and it is encouraging that many of our suggestions have been taken on board as the plans have progressed. ▪ FTA and our members remain committed to working with TfL to drive forward the safety agenda. We call for a clear, evidence-based road map that can deliver tangible improvements to safety as well as enable certainty for fleet procurement.
21.	<p>Road Haulage Association</p> <p>Response of the Road Haulage Association to Transport for London.</p> <p>“Phase 2c Policy Consultation document”. 22nd May 2019.</p> <p>Summary of the Consultation</p> <p>1. Transport for London (TfL) are consulting on Phase 2c of the Direct Vision Standard (DVS) proposals which are planned to be introduced in 2020. This will affect all operators of vehicles weighing more than 12 tonnes and operating in London. Proposals include penalties for both operators and drivers, who fail to comply with the proposed regulation.</p> <p>Background about the RHA</p> <p>2. The RHA is the leading trade association representing road haulage and distribution companies, which operate HGVs as profit centres. Our 7,200 members, operating near to 250,000 HGVs out of 10,000 Operating Centres, these range from single-truck firms to those with thousands of vehicles. These companies provide essential services on which the people and businesses of the UK depend.</p> <p>3. We proactively encourage a spirit of entrepreneurship, compliance, profitability, safety and social responsibility. We do so through a range of advice, representation and services, including training.</p> <p>4. We would like to thank Transport for London for the consultation and the opportunity to comment on the issues raised.</p> <p>5. In addition to answering the questions directly we have added further comments on related issues where we feel these are relevant.</p> <p>General Comments</p> <p>6. The RHA and its members are active supporters of road safety. It is apparent to the RHA that existing road safety measures have improved the safety of HGV operations in London and that TfL are not dealing with the real cause of fatalities on London roads.</p> <p>7. The RHA has engaged with this process since its inception. The RHA believes that vehicle standards should not be set locally –</p>

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the appropriate level for determining vehicle standards it nationally or internationally.

8. The RHA is in favour of improved safety standards, including in this area. Well thought through standards at national or international level have been promoted to Government by the RHA and others, but have been rejected by current ministers.

9. We have also been concerned since the inception of this project that TfL have focussed almost exclusively on one aspect – the physical nature of lorries, and have failed to examine and holistically assess the causation of collisions on London roads. TfL have largely ignored behavioural and infrastructure issues throughout.

10. The RHA believes that locally mandated vehicle standards are complex, expensive and result in often ineffective or inappropriate measures being introduced.

11. The RHA also believes that locally based permit or registration schemes as proposed in this case undermine good quality national regulation. There is a danger that other local authorities will demand their own additional registration or permit schemes, leading to a patchwork of regulation and standards that will be difficult and expensive to comply with.

Response to the Questions

Question; If you have any comments on the final proposals for the HGV Safety Permit Scheme please set them out below. If you wish to object to the Amendment Order please clearly specify your grounds for doing so.

12. The RHA reiterates the lack of benefit from this scheme. In that the Benefit Cost Ratio benefit/cost ratio for the Scheme (Option 5) ranges from 0.140 to 0.168. Source - Phase 2a Policy Consultation document https://consultations.tfl.gov.uk/roads/direct-vision-standards-phase-2/user_uploads/1-phase-2a-policy-consultation-document.pdf If a BCR is less than 1, the project's costs outweigh the benefits and it should not be considered.

13. The RHA has previously raised the issue of drivers and PCN. We note that drivers will only receive a PCN in the event of exceptional circumstances.

14. The “safe system” requirement for audible warnings will create noise nuisance, because of the number of vehicles fitted with this type of warning device, other road users will become oblivious to the noise.

15. Despite the effectiveness of visual warning devices, TfL are not advocating repeater indicators in side marker / obligatory lights. These are a highly effective visible means of warning other road users of the drivers intention to turn.

Final Comments

16. The National Infrastructure Commission published an interim report into the Future of Freight and refers to “Freight blindness”. Stating, “This report has demonstrated that both government and local authorities often have little understanding of why and how to plan for freight, leaving the needs of the freight system far down the priority list. This has resulted in policy makers or planners being unable to take account of, or plan effectively for, the needs of freight.” The RHA considers that the proposed TfL measures fall into this category. This is further evidenced by the BCR ratio.

17. Hire and foreign based vehicles could enter the TfL area totally unaware of this parochial scheme. Standards must be set nationally and be agreed internationally, not by TfL officials.

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22.	<p>London Cycling Campaign London Cycling Campaign response to the Direct Vision Standard (DVS) phase 2c consultation May 2019</p> <p>About the London Cycling Campaign London Cycling Campaign (LCC) is a charity with 20,000 supporters of whom 12,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.</p> <p>Introduction LCC has a long-standing concern about lorry safety, and the charity has mounted many campaigns in the past to address this, as well as worked directly with the industry to improve standards. Accordingly, LCC welcomes the opportunity to respond to the final (phase 2c) Direct Vision Standard consultation. We consider the recently developed DVS, and the replacement of more hazardous vehicles with safer ones, to be a vital element of reducing road danger in London and also meeting the Mayor's Vision Zero target of eliminating fatal and serious road collisions in London by 2041. We would like the safety permit system to lead to the highest standard DVS vehicles becoming the standard type on London roads, in line with the commitment of Mayor Sadiq Khan to 'the safest lorry types become (ing) the norm on London's streets.' We also want TfL to ensure, through regulation and enforcement, that any interim 'mitigating measures' for trucks that don't currently meet the required star grading are of sufficiently high quality standard to reliably provide the visual and audio information drivers need to reduce road danger.</p> <p>We note, and welcome, the recent progress made at European Union level on approving the new EU General Road Safety regulations that require the manufacture of heavy good vehicles with far improved direct vision as of 2023 (the deadline for new lorry models) and 2027 (the deadline for all new lorries). We trust that this measure will help increase the selection of such safer vehicles available for purchase.</p> <p>Collisions with lorries are the single biggest source of cyclist deaths in London (approx. 50%) and a major factor in pedestrian deaths (approx. 20%). LCC therefore strongly supports the Mayor's initiative to ensure that the most dangerous lorries (those with the worst direct vision) are kept off London's streets to protect both those walking and cycling. We note that one of the public promises the Mayor made to LCC members and supporters, ahead of being elected, was to make 'direct vision' lorries (ones with far fewer 'blind spots') "the norm" on London's streets.</p> <p>Specific comments We welcome the introduction of the Direct Vision Standard applied from October 2020 as a first step towards making safer lorries the 'norm' in London.</p>
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We note that a higher DVS standard will be set in 2024 and we trust that the additional revised safe system measures will further enhance road safety, ahead of all vehicles meeting the required direct vision standard.

We are disappointed that driver training, in line with the government –approved Safer Urban Driving module, is not part of the mandatory requirements under the safe systems scheme. We do however welcome the TfL commitment call on the Department for Transport “to make Safe Urban Driving a compulsory part of the Driver Certificate of Professional Competence ” and we trust this commitment will be acted upon.

We trust that the freight and construction industries will support the current DVS proposals to reduce road danger in London, and will also work towards the goal of only using vehicles of the highest DVS standard in the capital.

Previous comments and TfL response to issues raised

We note that several of LCC’s constructive comments in response to the last consultation were not addressed in the Response to Issues Raised document. In particular we note that it would be useful if data was gathered on the progress of the DVS standard and shared where relevant.

In the appendix below we therefore we repeat the consultation comments we provided to the earlier consultation on DVS.
Appendix 1

1. To what extent do you agree or disagree with our proposed process for obtaining a vehicle star rating?

We strongly support the process for obtaining a vehicle star rating.

Where relevant, applicants should be advised of the advantages of purchasing vehicles with higher ratings and given details of highly rated vehicles.

The system could be enhanced by facilitating access to data on vehicle permits and ratings issued in London, subject to data protection, to developers, planning authorities and highway authorities. This would enable these organisations to assess the transition to the safest lorries and help them meet their internal targets for road danger reduction.

2. To what extent do you agree or disagree with our proposals for the permit application process?

It is not clear if the application process will check the operator licences and what steps would be taken if this licence were to be revoked or not renewed. A process for the withdrawal of safety permits is required.

Some operators may decide to upgrade to star graded vehicles during the period to 2024. If this occurs it would be useful to note the data to assess progress towards making safer lorries the norm.

3. To what extent do you agree or disagree with our proposed safe system mitigating measures - for example cameras and mirrors.

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	<p>We agree with the need for mitigating measures in the period of transition to vehicles with five star direct vision on London roads. We note that earlier estimates of half of 'in-scope' vehicles being assessed as zero star have now been reduced in the more detailed study for TfL to less than 30%.</p> <p>The proposed measures could be improved and enhanced.</p> <p>The quality standard of some of the measures, notably cameras and audible/visual alert systems for drivers, must be defined more precisely so that fleet operators do not purchase ineffective systems that could give drivers misleading signals about the proximity of pedestrians and cyclists. Installing cameras and alert systems must contribute to reducing road danger and not be a box-ticking exercise. We note that the FORS Silver minimum requirements specified in the FORS document: "FORS Vehicle safety equipment guide – supports the FORS Standard version 5" could serve as the minimum for the mitigating measures requirements.</p> <p>Given that a camera system must be fitted under the mitigating measures scheme, the addition of a requirement for a rear facing camera would help reduce the chance of a collision when reversing and enable the driver to see approaching vehicles. We note that this is already a requirement for FORS Silver grade members.</p> <p>The advice to provide driver training in Safer Urban Driving (SUD) needs to become a mandatory requirement of the permit scheme for all operators that are London-based or frequent suppliers to London locations. This should already be the case for all firms that are registered for FORS Silver grade or CLOCS champions.</p> <p>While SUD may be difficult to enforce in thousands of cases, a single declaration of providing SUD to all drivers by the fleet operator (or, alternatively, proof of FORS Silver or CLOCS membership (which require SUD training)) could be accepted for the purpose of issuing a permit and drivers would then need to demonstrate having completed such training, which is entered on their Certificate of Professional Competence (CPC) training document, if stopped for a roadside check. Since such training can form part of every driver's required CPC training it is both cost and time effective.</p> <p>The TfL permit scheme must define a clear path for wide-spread adoption of lorries with good direct vision in London (in addition to any safe system mitigating measures). TfL should reflect the Mayor's commitment, cited above, "that the safest lorry types become the norm on London's streets."</p> <p>A potential strategy for some fleet operators to meet 2020 DVS requirements is to select N3 (on-road HGVs) lorries, as opposed to N3G (off-road HGVs) for use on London roads. N3G vehicles are over-represented among HGVs in cyclist fatalities and have worse direct vision than equivalent N3 vehicles. N3G vehicles should be identified as part of the DVS permit system so that research can be conducted on the reasons for their significant over-representation in the fatality statistics.</p> <p>The 'safe system' mitigating measures for N3G vehicles used on London roads should include operator registration at FORS silver grade and/or CLOCS champion status.</p>
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	<p>The 2024 deadline should be sufficient to enable enough landfill sites to cater for LEC (low entry cabs) or N3 lorries and for London operators to switch to such sites. Therefore, as of the 2024 three star deadline, N3G vehicles that are zero graded should either be excluded from London or, where exceptional circumstances are shown by FORS Silver or CLOCS registered operators , restricted to chargeable day permits under the DVS scheme.</p> <p>TfL must lobby to ensure N3G vehicles are registered with the DVLA.</p> <p>4. To what extent do you agree or disagree with our proposals for how we enforce the scheme and how appeals will be dealt with? We support the enforcement system but would like to see verifiable electronic documentation issued to permit holders so that they can demonstrate to clients and local authorities that they comply with the DVS. This may serve as an incentive to compliance. As noted above, a process for the withdrawal of permits and regrading of permits needs to be developed as part of the enforcement system.</p>
23.	<p>UPS</p> <p>UPS Response to Draft Direct Vision Standard Proposal – Phase 2C</p> <p style="text-align: right;"><i>May 2019</i></p> <p>On behalf of UPS, I would like to submit the following response to the Direct Vision Standard (DVS) Consultation Phase 2C.</p> <p>Introduction</p> <p>UPS is one of the world's largest logistics companies, playing a vital role in the collection, warehousing and delivery of goods. Our UK operation includes more than 50 operating facilities, approximately 8,000 employees and a fleet of more than 2,200 vehicles. UPS provides critical national and international time sensitive delivery services for businesses of all sizes and the express sector contributed £2.3bn to UK GDP in 2010, and transports £11bn of UK exports a year.</p> <p>Commitment to Health and Safety</p> <p>UPS is committed to the health and safety of its own employees and vehicles as well as other road users. Meeting our service responsibilities to customers requires a deep-seated commitment to the health, safety, and well-being of our people. We invest every year in wellness coaching and health and safety training with UPS employees globally receiving more than 10 million combined hours of safety training each year. We continue to implement on-road safety training and vehicle technology to help reduce vehicle accidents. We maintain our vehicles with our own fully trained technicians wherever possible. We are fully committed to ensuring UPS vehicles are maintained to the very highest standards of safety and compliance at all times. All of our London based vehicles are FORS accredited and have cyclist warning stickers on the nearside rear of vehicle and a left turn signal audible warning.</p>

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	<p>In 2017, UPS opened a bespoke driver training centre in the UK, UPS Integrad, in Burton-upon-Trent. This facility has been specifically designed to offer comprehensive training on safe driving and customer service methods. The Integrad training encompasses a mixture of 3-D computer simulations, webcast learning modules, and traditional classroom instruction – ensuring drivers are practiced in road safety and prepared to offer industry-leading customer service. In 2018, UPS invested over 43,000 hours of training on new drivers from this facility (which is prior to undertaking any CPC training).</p> <p>DVS Proposal – Phase 2c</p> <p>UPS supports the Mayor's aim to eradicate all deaths and serious injuries caused by road collisions by 2041. UPS also supports the response from the Freight Transport Association (FTA). Whilst we are happy to see that previous feedback from ourselves and the industry has been listened to, we still do have several concerns. First, as a company that operates not just in London or the UK, but across Europe (and globally), we feel that safety standards should not be set purely at a city or even country level but should be set at an EU or international level. Currently, manufacturers are not producing vehicles to the specifications outlined so operators may incur costs to retrofit vehicles to the specifications and may not be able to meet current timelines. If London implements bespoke safety measures, this will create a niche market for manufacturers and drive up prices for operators. With over 2,000 vehicles operating in the UK (and over 14,000 in Europe), we would support consistency of standards across the UK and Europe.</p> <p>Progressive Safe System</p> <p>We welcome the confirmation that a further consultation will be carried out on the progressive safe system in 2022 but would suggest a deferred timeline for the introduction of any changes to the system. Vehicles that we purchase today will still be in service beyond 2024 and whilst equipment can be retrofitted, it is always better for these to be stipulated from the beginning on new vehicles. Whilst we understand that with advancements in technology and other safety methods, the safe system scheme needs to continue to advance and be updated, we would argue that when measures are tightened up from 2024, these should only involve new vehicles and should not require additional investment to existing vehicles that have already been outfitted with safety equipment. As such, we would urge TfL to consider the progressive safe system and any new requirements to only apply to new vehicles purchased from 2024.</p>
24.	<p>Volvo</p> <p>Volvo Group Response- Direct Vision Standard Phase 2c Policy Consultation</p> <p>Please find attached the Volvo Group response to the latest Phase 2c consultation; this is a combined response, with reference to Volvo Trucks and Renault Trucks.</p> <p>The main concerns with regard to this consultation is the timing given there are still many open processes in terms of administering, validation and compliance.</p>

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Changes from Consultation Phase 2b:

We welcome the amendment made to the in-cab monitor requirements which has removed the need for the monitor/s to be positioned near the cab mirrors or window ledge, the nearside traffic situation at junctions is so dynamic in terms of relative acceleration that the best position for the screen for nearside view is close to the driver.

We also agree with the removal of the requirement for operators to detail their driving training plans when applying for the permit. Given that this is not a requirement within the scheme and can be catered for by the provisions already in place for Driver CPC.

October 2019 – Permit Application Opening

The permit application system is set to go live in October this year. Will the guidelines for what is required from those investing in safety systems to meet the Safe System be clear by this date?

Given the size of the vehicle parc servicing London, there is a large retrofit market that will require fitment for the mandatory day on 26th October 2020. Our experience suggests many operators are anticipating using the safe permit solution to operating vehicles after this date, so are concerned that there may be supply issues approaching this date.

Validation and Certification: For Direct Vision

From the first phases of the consultation in which the star rating protocol was defined, manufacturers have self-certified their ratings according to a protocol not a standard.

- How will the standard be implemented and overseen? This needs to be determined as soon as possible to allow manufacturers to rate their vehicles and the vehicle parc.
- What organisation will be responsible for the standard and ratings compliance at the time of introduction?
- What will the validation and compliance process entail?
- What is the timing for this?
- What is the process to certify star ratings for new models? Compiling the test report and registering this with the responsible organisation?

Non-Disclosure Agreement and Data Sharing

The truck manufacturers need some clarity on the status of the non-disclosure agreement and data sharing relating to how we transfer vehicle rating data to TfL. There was a discussion on this and the possibility via a website or portal.

Physical Permit Certificate

It is important for customers to have a physical record of their compliance with the DVS. We believe that there would be value in having an on-vehicle 'identifier' for the scheme (as for FORS). This would reassure agency drivers driving an unfamiliar vehicle into London reducing the risk of non-compliance and being charged £130 for driving a vehicle without the correct permit. This may also be a good PR message to promote the scheme to other road user groups.

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	<p>Safe System Minimum Requirements and Type Approval</p> <p>Will there be a minimum specification demand in place for the equipment required in the Safe System? This should cover issues such as camera quality, monitor screen resolution and minimum viewing angles. To meet the requirement operators are being asked to retrofit, so agreed standards on the system and installation are required. To prevent misuse of the System or misinterpretation of the expected specification, operators need to be guided by a defined standard.</p> <p>Any safety system approved and type approved by a vehicle manufacturer will meet Electromagnetic Compatibility demands and related directives about vision or sensors. We would expect that such a system would be compliant with any DVS Safe System specification. Note these components are currently fitted post registration in compliance with current EC or UK legislation.</p> <p>DVS and the HGV Safety Permit:</p> <p>Great care needs to be taken in communication of all elements of the Direct Vision Standard, 'Safe Scheme' and the HGV Safety Permit. There is already considerable confusion. Our latest interpretation is that the HGV Safety Permit is the scheme, and the DVS is one way to meet this scheme, as is the Safe System.</p> <p>Euro V Vehicle Ratings:</p> <p>At the time of writing we have yet to receive any more information on the Group Euro V star ratings. We have the table from TfL showing the minimum and maximum rating which some of our Euro V vehicles can reach, but have insufficient data to allow us to directly calculate the rating of individual chassis of this emission standard.</p> <p>As a Group, we are concerned that the current timeline retains significant elements of risk which make it harder to achieve the desired objectives of improving safety for all road users.</p>
25.	<p>Rospa</p> <p>Introduction</p> <p>Earlier this year, Transport for London consulted on the final scheme proposals for their Heavy Goods Vehicle Safety Permit Scheme, including the application process, safe system requirements and enforcement of the scheme.</p> <p>RoSPA's response to this consultation can be found at: https://www.rospa.com/rospaweb/docs/advice-services/road-safety/consultations/2019/consultation-response-to-direct-vision-standard-tfl-2019.pdf</p> <p>The proposed scheme is applicable to HGVs weighing over 12 tonnes gross vehicle weight operating in or entering Greater London. It is proposed that permits will be available on a voluntary basis from October 2019 with enforcement of the scheme beginning in October 2020.</p> <p>Based on the responses to the earlier consultation, Transport for London have made a number of amendments to their proposals. These changes include the clarification of safe system requirements, driver training requirements and how permits will be issued. There are also details on appeal where a permit application is refused. Finally, information is provided on how the scheme will be</p>

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enforced and the appeals process regarding any penalty charge notice issued under the scheme.

Transport for London are now consulting on the proposed scheme changes and the proposal that the scheme will be implemented by using an existing Traffic Regulation Order (TRO) in connection with the London Lorry Control Scheme operated by London Councils. They are also consulting on the order to make the necessary changes to the TRO to accommodate the new HGV Safety Permit Scheme alongside the London Lorry Control Scheme.

This is the response of the Royal Society for the Prevention of Accidents (RoSPA) to Transport for London's consultation on the Heavy Goods Vehicle Permit Scheme. It has been produced following consultation with RoSPA's National Road Safety Committee. RoSPA have no objection to this response being reproduced or attributed.

Updated proposals on the HGV Safety Permit Scheme

London has a particular problem with HGV collisions involving people walking and cycling, compared to other cities and the UK as a whole. Between 2015 and 2017, HGVs were involved in 25% of pedestrian and 63% of cyclist fatalities despite only making up 4% of miles driven in London. Commonly cited causes of accidents involving HGVs include 'failed to look properly' and 'vehicle blind spot'. Therefore, RoSPA welcome the introduction of a direct vision scheme, as we believe it will create safer vehicles, safer urban environments and has the potential to make those walking, cycling and travelling by motorcycle in London feel safer. Having a direct vision scheme rating for HGVs will also inform purchasing and leasing options for the operator, allowing them to select vehicles that are more suitable for working in busy and built up environments.

The updated proposals include clearer guidance on the requirements of the Safe System mitigating measures. Under the proposed scheme, from October 2020, zero-star rated vehicles or un-rated HGVs will be banned unless they can demonstrate that they can comply with safe system mitigating measures. These vehicle safety measures, which can be fitted at or after the point of manufacture, are designed to reduce the risks HGVs present to vulnerable road users, such as pedestrians, cyclists and motorcyclists.

The consultation document clearly sets out the vehicle equipment required to obtain a permit. This includes measures to improve indirect vision, such as mirrors, sensors and camera monitoring, warnings to notify other road users of the vehicle's intended manoeuvre via audible warnings and warning stickers and measures such as side under-run protection (unless proven impractical or impossible) to minimise physical impact of a hazard.

There is an estimated maximum cost of around £2,000 per vehicle to fit equipment to comply with all safe system requirements if not already fitted. The document notes that many operators will be at or near this level, meaning the cost to them will be considerably less. It is also important to note the emotional and financial costs of a HGV being involved in a collision with a pedestrian, cyclist or motorcyclist are much higher than the cost of installing safe system mitigating measures. Costs include the pain and devastation for people affected by a collision that could have been avoided, alongside financial costs to the operator such as disruption to the

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	<p>business, loss of the use of vehicle and driver and reputational damage.</p> <p>RoSPA agree with these safe system mitigating measure requirements, as fitting this technology and equipment to all HGVs operating in or entering Greater London has the potential to reduce the number of close-proximity blind spot collisions and should a collision occur, measures such as under-run protection can minimise the probability and severity of under-run collisions with vulnerable road users. The scheme could result in reduced road fatalities and serious injuries and increased levels of active travel such as walking and cycling as a result of people feeling safer on London's roads.</p> <p>The document proposes that for vehicles rated below three stars, permits will expire in 2024. From 2024, zero, one and two star vehicles will be required to demonstrate compliance with the updated progressive safe system, which will incorporate new technology available at that time. New permits will then be issued for these vehicles with progressive safe system conditions attached. A commitment to consult on the progressive safe system in 2022 ahead of its introduction in 2024 is welcomed by RoSPA.</p> <p>Based on technology available at the time, stakeholders and members of the public can help to inform the new standard of safe system technology and equipment that will need to be fitted to vehicles for them to obtain a permit to enter and operate in Greater London. It will also allow adequate time for operators and fleet managers to plan their fleets. We are pleased that vehicles adhering to the progressive safe system will continue to be able to operate in London, as the life cycle of a truck is far longer than a conventional car.</p> <p>The new consultation document clarifies that driver training, while highly recommended, will not be a mandatory requirement for obtaining a permit. A list of providers will be included on the permit application portal. RoSPA believe that ideally, all drivers should have some driver training to encourage the highest standards of safe driving. We are disappointed that this will not be a mandatory requirement, as training encourages drivers to have the knowledge, skills and attitude to recognise, assess, manage and reduce the risks that their vehicle poses to vulnerable road users. However, we do recognise that this may not have been possible and enforceable in practice. We would still like to see operators asked to demonstrate their system or plan in place to train all drivers in vulnerable road user safety and the use and limitations of supplementary safety equipment when applying for a permit. RoSPA agree with the calls made by TfL for the Department for Transport to make safe urban driving a compulsory part of the Driver Certificate of Professional Competence.</p> <p>The document also clarifies that for HGVs that meet the minimum Direct Vision Scheme rating of one star in 2020, a permit will be issued automatically after completing the online application. This will be logged on the Transport for London database to ensure that penalty charge notices are not issued against the vehicle registration mark when the scheme enforcement goes live. For those who do not meet these standards and are required to fit the Safe System, permits will be issued within 28 days following the approval of a Safe System evidence pack. Once enforcement of the scheme begins in October 2020, the turn-around period will be shortened. RoSPA agrees that the process of applying for a permit for single or multiple vehicles has been clearly outlined in the consultation</p>
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Appendix G: DVS and HGV Safety Permit Scheme - Phase 2C consultation responses

document. It is also clear the number of years for which a permit will be valid, based on the DVS star rating for the vehicle. RoSPA are also pleased that the website can be translated for foreign operators, allowing vehicles from abroad to join the scheme. Support must be offered to foreign operators to allow them to complete the application form and be able to continue to operate in London if their vehicles are compliant with the scheme, or have safe system mitigating measures fitted.

Further guidance on the enforcement process for the scheme has also been included. The scheme is fully enforceable, whereby the absence of a permit or a vehicle not operating in compliance with safe system permit conditions becomes a contravention for which a penalty charge notice can be issued. TfL propose enforcing the scheme using both fixed and mobile automatic number plate recognition cameras, for which the existing network of automatic number plate recognition cameras will be used. No new signage is expected to be required as the signage used for the original Safer Lorry Scheme will be used for the new scheme. TfL also plan to work in partnership with the police and DVSA to deliver targeted enforcement activity including road side compliance checks to focus on the most non-compliant and dangerous drivers, vehicles and operators.

Finally, details have been provided on the appeals process regarding any penalty charge notice issued under the scheme. RoSPA agree with both the enforcement approach that TfL propose to use and the appeals process, as it is not feasible for the Police to be expected to enforce the scheme.

Traffic Regulation Order Amendments

It is proposed that the scheme is implemented by a traffic regulation order, and the document includes a statutory consultation on the Amendment Order that does this. RoSPA understand that it has been proposed that the Greater London (Restriction of Goods Vehicles) Traffic Order 1985 should be changed to incorporate the HGV Safety Permit Scheme, alongside the London Lorry Control Scheme. This would involve inserting into Article 3(a)(i) a prohibition on HGVs over 12 tonnes operating in London without a HGV Safety Permit issued under Article 4(l) in accordance with an approved policy statement. RoSPA agree that this would be a sensible approach as it makes the permit scheme easily enforceable. This is because it is already decriminalised and therefore has no requirement for police or DVSA resource, although TfL do plan to involve these partners in some roadside compliance checks and targeted enforcement for the most dangerous drivers, vehicles and operators. RoSPA also believes that the two levels of non-compliance for operators and drivers will be a more effective deterrent than a £50 fixed penalty notice.

RoSPA have no further comments to make on the consultation process, other than to thank Transport for London for the opportunity to comment on their proposals. We have no objection to our response being reproduced or attributed.

London Councils Transport and Environment Committee

Royal Borough of Greenwich CCTV Item No: 21 Enforcement Approval

Report by: Andrew Luck **Job title:** Transport Manager
Date: 13 June 2019
Contact Officer: Andrew Luck
Telephone: 020 7934 9646 **Email:** Andrew.luck@londoncouncils.gov.uk

Summary: This report seeks approval for the Royal Borough of Greenwich to commence CCTV enforcement of parking contraventions under the Traffic Management Act 2004, bus lane contraventions under the London Local Authorities Act 1996 and moving traffic contraventions under the London Local Authorities and Transport for London Act 2003.

Recommendations: The Committee is asked to:

- agree that permission be given to the Royal Borough of Greenwich to enforce parking, bus lane and moving traffic contraventions using CCTV.

Background

1. London Councils' Transport and Environment Committee (TEC) is responsible for the approval of applications from London local authorities that wish to commence CCTV enforcement.
2. CCTV enforcement of parking restrictions commenced in August 2001 under the provisions set out in the London Local Authorities Act 2000, which built on the Road Traffic Act 1991. Both these Acts have now been repealed with respect to parking enforcement and replaced by the Traffic Management Act 2004 and regulations thereunder.
3. Currently, all London local authorities enforce parking restrictions by CCTV except the Royal Borough of Greenwich, the Royal Borough of Kensington & Chelsea and the London Borough of Lewisham.
4. Since 2015, CCTV enforcement of parking restrictions has been limited by amendments to the Traffic Management Act 2004 regulations to the following areas:
 - a bus lane

- a bus stop clearway or bus stand clearway
 - a restricted area outside of a school
 - red routes.
5. CCTV enforcement of bus lane restrictions is performed under the provisions set out in the London Local Authorities Act 1996.
 6. Currently all London local authorities have TEC agreement to enforce bus lane restrictions by CCTV except the Royal Borough of Greenwich and the Royal Borough of Kensington & Chelsea.
 7. The London Local Authorities and Transport for London Act 2003 allows London authorities to take on the civil enforcement of certain moving vehicle contraventions. TEC agreed on 21 July 2005 that the pilot scheme was complete and authorities that wished to take on the powers should apply to the Committee for approval to commence.
 8. Currently, all London local authorities enforce moving traffic restrictions by CCTV except the London Borough of Bromley, the Royal Borough of Greenwich and the Royal Borough of Kensington & Chelsea.
 9. Transport for London also enforces parking, bus lane and moving traffic contraventions by CCTV, but does not require the Committee's approval to do so.

Application to Commence CCTV Enforcement by the Royal Borough of Greenwich

10. A traffic authority cannot choose which contraventions to enforce; they must take on responsibility for all the contraventions across the whole of the authority's area. The key steps for boroughs planning to adopt the powers are:
 - Liaise with the police regarding transfer of enforcement
 - Produce an inventory of all locations where the prohibitions, restrictions and instructions to vehicles can be found
 - Review all prohibitions and restrictions to make sure they are appropriate
 - Review all related signs and markings to make sure they are in good condition
 - Obtain council resolution to take on the powers
 - Advertise the passing of the resolution and date set, in a local newspaper and in the London Gazette
 - Identify the enforcement regime and capacity
 - Determine enforcement priorities
 - Apply to London Councils TEC for approval to take on the powers
 - Carry out local publicity and an awareness campaign
11. An application to commence enforcement of parking, bus lane and moving traffic contraventions has been received from the Royal Borough of Greenwich (Appendix A), which is proposing to commence enforcement from 1 December 2019. Appendix A also includes a list of current moving traffic locations by contravention in the borough, a list of current bus lane locations in the borough, and a list of school locations in the borough where contravention code 48 (stopped in a restricted area outside a school, a hospital or a fire, police or ambulance station when prohibited) may be enforced by CCTV.

12. Appendix A also contains model Penalty Charge Notices for CCTV parking enforcement, bus lane enforcement and moving traffic enforcement.
13. Members are recommended to approve the application for enforcement using CCTV from the Royal Borough of Greenwich as the authority has followed the key steps outlined in paragraph 10 and the application meets the criteria set down by the Committee.

Financial Implications

14. There are no financial implications to London Councils arising from this report.

Legal Implications

15. There are no legal implications to London Councils arising from this report.

Equalities Implications

16. There are no equalities implications to London Councils arising from this report.
17. In implementing CCTV enforcement, it is important that authorities consider the implications for people with disabilities. Vehicles displaying Blue Badges are exempt from certain parking regulations and it is vital that Penalty Charge Notices are not issued to these vehicles where exemptions apply.

Recommendations

18. The Committee is asked to:
 - agree that permission be given to the Royal Borough of Greenwich to enforce parking, bus lane and moving traffic contraventions using CCTV.

Appendices

19. Appendix A contains the application to commence enforcement of parking, bus lane and moving traffic contraventions from the Royal Borough of Greenwich

APPENDIX A

Contact: Graham Nash
Tel: 020 8921 2268
graham.nash@royalgreenwich.gov.uk



Mr Spencer Palmer
Director Transport and Mobility
London Councils
59 Southwark Street
LONDON SE1 0AL

31 May 2019

Parking Services
Directorate of Regeneration,
Enterprise & Skills
The Woolwich Centre
5th Floor
35 Wellington Street
London SE18 6HQ

Dear Mr Palmer,

Application for approval to commence CCTV enforcement of moving traffic, bus lane and parking contraventions in the Royal Borough of Greenwich

Please accept this letter as formal application to commence CCTV enforcement of moving traffic, bus lane and parking contraventions with effect from 1 December 2019.

I have attached inventories of those locations within the borough where moving traffic, bus lane and parking contraventions could be enforced

I can confirm that any CCTV monitoring operations will take place in a controlled environment and will be carried out in accordance with the Code of Practice

Also enclosed with this application are sample penalty charge notices which will be issued for moving traffic, bus lane and parking contraventions

If you have any queries regarding this application please contact me direct

Yours sincerely,

A handwritten signature in blue ink that reads "Pippa Hack".

Pippa Hack
Director - Regeneration, Enterprise & Skills

Appendix I – List of Moving Traffic Locations by Contravention

Contravention Code 31 – Entering and stopping in a box junction when prohibited

Location	Traffic Order
Baker Rd junction with Shooters Hill	Not Applicable
Blackwall Lane 50mtrs beyond junction with Tunnel Ave	Not Applicable
Blackwall Lane junction with Salutation road	Not Applicable
Blackwall Lane junction with Telcon Way	Not Applicable
Blackwall Lane junction with Tunnel Ave	Not Applicable
Charlton Church Lane junction with Troughton Rd	Not Applicable
Creek Road junction with Glaisher St	Not Applicable
Peartree Way junction A1020/A102	Not Applicable
Pettman Crescent junction Western Way	Not Applicable
Plumstead Common junction with Bloomfield Rd	Not Applicable
Westcombe Hill junction with Vanbrugh Park Rd	Not Applicable
Wickham Lane junction with Oakmere road	Not Applicable
Woolwich Rd junction with Vanbrugh Hill & Blackwall Lane	Not Applicable

Contravention Code 32 – Failing to drive in the direction shown by the arrow on blue sign

Location	Directional instruction	Traffic Order	Year
Admaston Rd	Directional south to north on that length of Admaston Road that extends between Palmerston Crescent and Plumstead Common Road;	24	2006
Aldeburgh Street	Directional Sth - Nth only in that length of Aldeburgh Street that extends between its junction with Fearon Street and its junction with the east to west arm of Aldeburgh Street	26	2001
Anchor & Hope Lane	At Junction with Woolwich Rd proceed left only	4	1999
Ashburnam Place,	Directional East - West only in Ashburnham Place, between its junction with Greenwich South Street and its junction with the western kerb-line of Langdale Road	69	1999
Blackwall Lane	When travelling north-eastward in Blackwall Lane, at junction with the A102 southbound exit slip road ahead only	46	2004
Blackwall Lane	At Junction with Blackwall lane ahead only into Tunnel Lane	51	2013
Bloomfield Road	Directional north – south only from Crescent Rd	41	1999
Burrage Place	Directional west - east only	21	2005
Campfield Road	Directional north east -south west only	65	1999
Collington St	One direction - Sth west - Nth west from Hoskins St to Lassell St	50	2012
Colomb Street	Directional north west - south east only from junction with Pelton road to junction	80	1999

	with Trafalgar Rd		
Combedale Rd	One direction south - north between Westerdale Rd & Westcombe Hill	50	2012
Denham Street	Directional northerly only from Woolwich Road	72	2016
Devonshire Drive	Directional south east - north-west from Greenwich High Rd to Egerton Drive	69	1999
Edge Hill	One way only from junction with Herbert Rd/Plumstead Common	41	1999
Egerton Drive	Directional south – north only 13.5mtres from junction with Greenwich High Rd	69	1999
Ennis Road	Directional north east - south west only in Ennis Rd between its junction with Upton Road and its junction with Tuam road	4	2002
Fearon Street	Directional east - west only from junction with Aldeburgh St	26	2001
Granite Street	Directional west – east only	28	2004
Greenwich Church Street	One direction South West - North East only between Nelson Rd & College approach	25	2011
Halstow Rd	Directional turn left into Chevening Rd prior to junction of Halstow Rd and Woolwich Rd	72	2016
Horncastle Rd	At junction with Alnwick Rd directional South West - Nth East only	17	1999
Hyde Vale	Left only at Junction with Blackheath Hill	46	1998
Love Lane	Travel North West - South West only	66	2013

Nelson Road	Travel North East - South West only	25	2011
Penmon Rd	One way only from Eynsham Rd	38	2018
Perpins Road	Directional One way only from junction with Alderwood Rd to junction with Restons Crescent	11A	2007
Porcupine Close,	Directional south east – north west only in that length of the south east to north west arm of Porcupine Close, which extends between its junction with the north-east to south-west arm of Porcupine Close and its junction with Court Road,	76	2000
Red Lion Lane	Directional south - north from junction with Shooters Hill to junction with Constitution Rise	55	2000
Sandy Hill Road	Directional south – north only in that length of Sandy Hill Road that extends between Plumstead Common Road and Bignell Rd	41	1999
Spray Street	Directional west - east for 21mtrs from junction with Woolwich New Rd	3	2009
St. Johns Park	Directional only - westerly between 28-40 St Johns Park to the south east kerbline of Stratheden and the Sth west kerbline of St Johns Park north of St Johns Park church	24	2018
Tamar Street	At Junction with Woolwich Church Street travel west - east only	2	1996
Tuam Road	Directional west - east only from Ennis Road	4	2002
Vanbrugh Terrace	Left turn only at junction with	15	1999

	Shooters Hill Rd		
Waterside Close	Travel anticlockwise only between 50 - 111 Waterside Close	45	2015
West Parkside	When travelling North West at junction with Southern Way ahead only into West Parkside	4	2009
West Parkside	When travelling South East at junction with Pilot Busway ahead only into West Parkside	4	2009
Whitworth Street	Directional south east - north west only in Whitworth St from Trafalgar Rd	80	1999
Woodland Grove	One way - westerly only	44	2018

Contravention Code 50 - Performing a banned turn

Location	Prohibition	Traffic Order	Year
A102 - Carriageway - South side Island site 2 junction with Blackwall Lane	No right turn	51	2013
A102 - exit slip road North side of Island site 1 junction with Blackwall Lane	No left turn	51	2013
A102 -Carriageway North side Island site 3 junction with Blackwall Lane	No right turn	51	2013
A102 -Carriageway North side Island sites 4 junction with Blackwall Lane	No left turn	51	2013
Beresford Street	No U turn in Beresford when travelling from Warren Lane towards	27	2007

	Junction with Macbean Street		
Blackwall Lane	No right turn from Blackwall Lane to the A102 northbound exit slip road	46	2004
Blackwall Lane	No left turn onto South bound carriage way A102 Tunnel South approach when travelling south-westward in Blackwall Lane from the roundabout situated at the junctions of Bugsby's Way, John Harrison Way and Millennium Way	17	2007
Blackwall lane carriageway, west side of Island site5 junction with A102 slip Rd	No right turn	51	2013
Blackwall Lane in South westerly direction from roundabout at jnc with Bugsby Way and John Harrison Way	No right turn on reaching junction with slip road leading to south bound carriageway of A102	26	2009
Charlton Church lane	No right turn at Junction with Woolwich Road	71	2014
Combedale Rd	No right no right turn at junction with Westerdale Rd	50	2012
Commercial Way	No right turn when entering Commercial Way from entrance/exit situated on north west side of Commercial Way 50mtrs south west of the Bugsby Way	3	2019
Creek Rd	No right turn at junction with MacMillan St	10	1997
Edmund Halley Way	No U turn once entered from Millenium Way	26	2009
Greenwich Church St	No right turn at junction	25	2011

	with College Approach		
Nightingale Place	No U-turn on reaching junction with Ha Ha Road, Woolwich Common & Woolwich New Rd	16	1999
Old School Close	No right turn at Junction of Old School Close & Millenium Way	56	2018
Peartree Way	No right turn at junction with Commercial Way	11	2019
Plumstead Road	No U turn travelling on Plumstead Road at junction with Arsenal Way and Burrage Rd in either direction	14	1987
Powis St	No left turn into Beresford Square	11	2013
Rochester Way	No U turns in either direction at junction with Glenesk Road	8	1988
Rochester Way	No U turns in either direction at jnc with Crookston Rd	268	1973
Southern Way	No right turn from Bugsby Way	16	2007
Stratheden Road	No U turn if travelling south westerly between 17/19 – 27/29 Stratheden Rd	24	2018
Thomas Street	No right turn Junction with Wellington St	27	1991
Tunnel Ave	No U turn between 212-14 Tunnel Ave and Peterboat Close	4	2019
Vincent Rd	No right turn at junction with Woolwich New Rd	37	2010
Westcombe Hill	No right turn at junction with Westerdale Rd	50	2012

Westcombe Hill	No left turn where carriageway links north east side Westcombe Hill to south west Side Blackwall tunnel south approach	50	2012
Wilmount Street	No right turn at junction with Woolwich New Rd	46	2009
Woolwich Church St	No U turn at Jnc with Kingsman Street	28	1988
Woolwich New Rd	No left turn if travelling northwards in at junctions of Beresford Street / Plumstead Road,	66	2018
Woolwich New Rd - Nth-eastern arm	No right turn into Tesco car park	98	2012
Woolwich Road	No right turn into Charlton Lane	96	1999
Woolwich Road	No U turn if travelling west in Woolwich Rd when vehicle reaches centre carriageway Island site opposite Ichthus New Life Church	14	2014

Contravention Code 51 – Failing to comply with no entry restriction

Location	Prohibition	Traffic Order	Year
Admaston Rd	No entry from Plumstead Common	24	2006
Aldeburgh Street	No entry from Fearon St	26	2001
Ashburnham Place	No entry into that section of Ashburnham Place that lies between Langdale road and Greenwich Sth Street	69	1999

Baker Rd	No entry into left hand slip road at junction with Shooters Hill	24	2002
Blackwall Lane	No entry through central reservation gap at junction with Tunnel Avenue to vehicles travelling westbound	52	2018
Bloomfield Road	No entry into Bloomfield Rd from Bloomfield Rd at junction with Raglan Rd	41	1999
Brookhill Rd	No entry at junction with Anglesea Rd	98	2012
Bugsby's Way	No entry into Southern Way at junction with Bugsbys way and Commercial Way	20	2007
Burrage Place	No entry from Burrage Rd	21	2005
Campfield Rd	No entry from Churchbury Road	65	1999
Camrose Street	No entry into that section of Camrose St Manton Road and Myrtledene Road	53	2018
Castile Road	No entry from Monk Street	27	1991
Collington St	No entry from Lassell Street	50	2012
Colomb Street	No entry from Trafalgar Rd	80	1999
Combedale Rd	No entry into that section of Combedale Rd that lies beyond junction with Westcombe Hill.	50	2012
Commerell Street	No entry in that section of Commerell that runs between the north-eastern kerb-line of Pelton Road and the party wall of Nos. 31 and	53	2018

	37 Commerell Street		
Cookhill Road	No Entry	53	2018
Denham Street	No entry from Tunnel Ave	72	2016
Devonshire Drive	No entry into Devonshire Drive from Greenwich High Rd	69	1999
Edge Hill	No entry from Herbert Rd	41	1999
Edmund Halley Way	No entry into Peninsula Busway	20	2007
Egerton Drive	No entry into Egerton Drive from Greenwich High Rd	69	1999
Ennis Road	No entry from Upton Rd	4	2002
Fearon Street	No entry from Peartree Way	26	2001
Frederick Place	No entry from Frederick Place at junctions with Crescent Rd & Sandyhill Rd	21	2005
Grangehill Road	No entry into the section of Grangehill Rd that runs between Earlshall Road and Craigton Road/Elibank Road	53	2018
Granite Street	No entry from Rockmount Rd	28	2004
Greens End	No entry from Thomas St or Wellington St	37	2010
Griffin Rd	No entry from Plumstead High St	17	2010
Halstow Rd	No entry into Halstow Rd from Halstow Rd at junction with Chevening Rd	72	2016
Horncastle Rd	No entry into Horncastle	17	1999

	Rd from Alnwick Rd		
King William Walk	No entry into College Approach	25	2011
King William Walk	No entry into King William Walk at junction with Nelson Rd & Romney Rd	25	2011
Love Lane	No entry from Thomas Street	37	2010
Macbean St	No entry between Powis St and Creton St	18	2010
Maze Hill	No entry into Park Vista	6	1998
Millennium Way	No entry into the central reservation gap at junction of millennium Way and Old School Close;	56	2018
Mottingham Road	No entry into Mottingham Rd service road at Jnc of Mottingham Rd and 205 Mottingham Rd	14	1995
Mycenae Road	No entry from Vanbrugh Park	6	2001
Nevada Street	No entry from King William Walk	25	2011
Old Woolwich Rd	No entry from Park Row	25	2011
Penmon Rd	No entry at Finchale Rd	38	2018
Perpins Road	No entry from Restons Crescent	11A	2007
Porcupine Close	No entry from Court Rd	76	2000
Red Lion Lane	No entry to Red Lion Lane from Red Lion Lane at junction with Constitution Rise	55	2000
Red Lion Lane	No entry into the south section of red Lion Lane	5	2011

	at junction with entrance to Shooters Hill Post 16 Campus		
Romney Rd	No entry into King William Walk at junction of Nelson Rd	25	2011
Romney Rd	No entry into King William Walk south east of junction of Nelson Rd & Romney Rd	25	2011
Sandy Hill Road	No entry into Sandyhill Rd from Sandyhill Rd at junction with Bignell Rd	41	1999
Spray St	No entry into section of Spray St that starts 21mtrs from junction with Woolwich New Rd	37	2010
St. Johns Park	No entry from Stratheden Rd	24	2018
St. Johns Park	No entry to St Johns from St Johns at location adjacent to 40 St Johns Park	24	2018
Tamar Street	No entry on to Woolwich Church St	2	1996
Tuam Road	No entry from Erindale	4	2002
Tunnel Ave	No entry into section Tunnel Ave which lies 70metres north-west of the junction with Morden Wharf Road	18	1996
Vanbrugh Park	No entry into Vanbrugh Park at junction with Charlton Way and Beaconsfield Rd	7	2001
West Parkside	No entry into Peninsula Busway or Southern Way	20	2007
West Parkside	No entry at junction with River Way and Edmund Halley Way	26	2009

Westcombe Hill	No entry into that section of Westcombe Hill which leads to southern Blackwall Tunnel Approach	50	2012
Whitworth Street	No entry from Pelton Rd	80	1999
Woodland Grove	No entry from Earlswood St	44	2018

Contravention Code 52 – Failing to comply with a prohibition on certain types of vehicles

Location	Prohibition	Traffic Order	Year
Ashburnham Place junction with Greenwich South Street	7.5t weight restriction	3	1992
Calderwood Street	7.5t weight restriction	69	2014
Catherine Grove junction with Blackheath Rd	7.5t weight restriction	3	1992
Devonshire Drive junction with Greenwich South Street	7.5t weight restriction	3	1992
Haimo Road	18t weight restriction	53	2018
Halstow Rd	2.1m width restriction	50	2017
Kidbrooke Park Road	2.1m width restriction	3	1990
Langdale Rd junction with Greenwich High Rd	7.5t weight restriction	3	1992
Lindsell Street	17t restriction at junction with Plumbridge St	5	1993
Maidenstone Hill	7.5t weight restriction	17	2019
Maxey Rd	7.5t weight restriction	64	2016
Romney Rd	7.5t weight restriction	42	1998
West Parkside	2.1m width restriction	52	2010

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Contravention Code 53 – Failing to comply with a restriction on vehicles entering a pedestrian zone

Location	Prohibition	Traffic Order	Year
Hare Street	Failing to comply with a restriction on vehicles entering a pedestrian zone	18	2010
Powis St	Failing to comply with a restriction on vehicles entering a pedestrian zone	18	2010
Powis St	Failing to comply with a restriction on vehicles entering a pedestrian zone	14	1996
Powis St	Failing to comply with a restriction on vehicles entering a pedestrian zone	18	2010
Vincent Rd	Failing to comply with a restriction on vehicles entering a pedestrian zone	37	2010
Woolwich New Rd	Failing to comply with a restriction on vehicles entering a pedestrian zone	37	2010

Appendix 2 – Bus Lane Locations

Contravention code 34 – Being in a bus lane

Location	Lane Dimensions	Operational Times	Exemptions	Traffic Order & Year
Anchor and Hope Lane, - southward with flow lane	From a point 143.00 metres north of its junction with Woolwich Rd extending to that	At any time	Local buses & Taxi	50 – 2001
Blackwall Lane – northward with flow lane	From a point 9.50 metres south-west of a point opposite the northern wall of Greenwich Town Social Club, Blackwall Lane to a point 73.00 metres north of the northern kerb-line of the vehicular access way leading to Lawrence Trading Estate, Blackwall Lane.	7am-7pm Mon-Sun	Bus, Taxi, Cycle, Coach	47 – 2004
Blackwall Lane - northward with flow lane	the west side, from a point 16.00 metres north of the north-eastern kerb-line of the A102 northbound on-slip from Blackwall Lane extending north-eastward for a distance of 65.00 metres.	At any time	Buses	47 – 2004
Blackwall Lane -	the east side,	7am-7pm Mon-	Bus, Taxi, Cycle,	47 – 2004

southward with flow lane	from a point 53.50 metres north of the northern kerb-line of vehicular access way leading to Lawrence Trading Estate, Blackwall Lane to a point 14.00 metres north-east of a point opposite the northern wall of Greenwich Town Social Club, Blackwall Lane	Sun	Coach	
Bugsby Way - north westward with flow lane	south west side 10m Nth western kerb line of sainsbury access road to 20m north west opposite Holiday Inn Hotel	At any time	Bus, Taxi, Cycle,	70 – 2014
Bugsby Way - Westward with flow lane	Sth side 9m west of western kerb line of Gallions Rd then westward for 117m	At any time	Buses, Cycles.	70 – 2014
Bugsby Way - Westward with flow lane	south side 45m east of eastern kerbline of Gallions Rd then eastward for 50m	At any time	Buses, Cycles.	70 – 2014
Central Way - north eastward	north west side for 178m from point 50m from northern kerbline of Barnham Drive	At any time	Local Buses, Taxis, Cycles	20 - 2014
Central Way - north eastward	north west side for 21m from point 62m from north eastern	At any time	Local Buses, Taxis, Cycles	20 - 2014

	kerb line Twin Tumps Way			
Central Way - north eastward	north west side for 106m from point 106m from north eastern kerb line Twin Tumps Way	At any time	Local Buses, Taxis, Cycles	20 - 2014
Central Way - north eastward	north west side for 92m from point 41.5m from north eastern kerb line of Thamesmere Drive	At any time	Local Buses, Taxis, Cycles	20 - 2014
Central Way - north eastward	north west side for 108m from point 185m from north eastern kerb line of Thamesmere Drive	At any time	Local Buses, Taxis, Cycles	20 - 2014
Central Way - northward	westside 197m from No. 93 Newmarsh Rd	At any time	Local Buses, Taxis, Cycles	20 - 2014
Central Way - southward	east side for 257m from point 60m south of the southern kerbline of Birchdene Drive	At any time	Local Buses, Taxis, Cycles	20 - 2014
Central Way - south westward	south east side for 155m from point opposite 301/312 & 701/712 Lansbury Court	At any time	Local Buses, Taxis, Cycles	20 - 2014
Central Way - south westward	south east side for 180m from point 62m south west of the south western kerbline of Oriole way	At any time	Local Buses, Taxis, Cycles	20 - 2014

Central Way - south westward	south east side for 180m from point 34m south west of the south western kerbline of Hutchins Rd	At any time	Local Buses, Taxis, Cycles	20 - 2014
Charlton Church Lane - Nth westward with Flow lane	south west side from point 26m Nth west of point opposite party wall of 25/27 Charlton Church Lane to 45m south east of south eastern kerbline of Woolwich Rd	At any time	Local Buses	70 – 2014
Creek Rd westward with flow lane	The south side from a point 40.00 metres east of the eastern kerb-line of Copperas Street to a point 60.00 metres west of the western kerb-line of Copperas Street	7am-7pm Mon - Sun	Bus, Taxi, Cycle	8 – 2004
Creek Road - Eastward with flow lane	the north side, from a point 15.50 metres east of the eastern kerb-line of Deptford Church St to a point 69.00 metres west of a point opposite the party wall of Nos. 165 and 167 Creek Rd	7am - 7pm Mon - Sun	Bus, Taxi, Cycle, Coach	8 – 2004
Creek Road - Eastward with flow lane	the north side, from a point 2.00 metres west of a point opposite the western wall of No. 163	7am - 7pm Mon - Sun	Bus, Taxi, Cycle,	8 - 2004

	Creek Rd to a point 44.00 metres west of the western kerb-line of Norman Road			
Creek Road - Eastward with flow lane	the north side, from the eastern kerb-line of Norway St to a point 18.00 metres west of the western kerb-line of Welland Street	7am - 7pm Mon - Sun	Bus, Taxi, Cycle,	8 - 2004
Creek Road eastward with flow lane	the north side, from a point 81.00 metres east of Gonson St to 18mtrs west of Welland St	7am - 7pm Mon - Sun	Bus, Taxi, Cycle,	50 - 2001
Creek Road westward with flow lane	the south side from a point 37.50 metres west of Creekside to boundary with LB Lewisham	7am-7pm Mon-Sun	Bus, Taxi, Cycle,	8 - 2004
Greenwich Hlgh Road - north eastward with flow lane	the north-west side, from a point 34mtrs Nth East from the north-eastern kerb-line of Prince of Orange Lane to a point 1m north-east of a point opposite the party wall of Nos. 221 and 223 Greenwich Hlgh Rd	7am - 10am & 4pm - 7pm Mon - Fri & 10am-4pm Sat & Sun	Bus, taxi, Cycle, Coach	40 - 2003
Greenwich Hlgh Road - Nth Eastward with flow lane	the north-west side. from a point 28 metres south-west of a point	7am - 10am & 4pm - 7pm Mon - Fri & 10am-4pm Sat & Sun	Bus, Taxi, Cycle, Coach	40 - 2003

	opposite the party wall of Nos. 275 and 277 Greenwich High Road to a point 27 metres north-east of the south western kerb-line of Stockwell Street			
Pear tree Way - south bound with flow	West side of the southbound carriageway in Pear tree Way, between a point 13.3 metres north and 90.7 metres north of the northernmost kerb-line of Commercial Way	At any time	Buses only	12 - 2019
Plumstead Rd - Eastward with flow lane	Nth side from a point 10mtrs west of a point opposite the western flank wall of Woolwich college extending eastward for 193mtrs	At any time	Bus, Taxi, Cycle	45 - 2016
Plumstead Rd - Westward with flow lane	South & south west side from a point 24mtrs north west of party wall 155/156 Plumstead Rd to a point 68mtrs east of the south east kerb-line of Burrage Rd	At any time	Bus, Taxi, Cycle	45 - 2016
Plumstead Rd - Westward with flow lane	From the western kerb-line of Burrage Rd to a point 137 mtrs west of that kerb-line	7am-7pm Mon - Sat	Bus, Taxi, Cycle	45 - 2016

Plumstead Road Eastward with flow lane	the north side from a point 32.00 metres east of a point opposite the western flank wall of Nos. 1-36 Gill Court, Plumstead Road extending eastward for a distance of 357m	At any time	Bus, Taxi, Cycle	3 - 2004
Romney Road - south westward with flow lane	the south-east side, from a point 75 metres south- west of the south-western kerbline of Park Row to a point 11mtrs north- east of a point opposite the north-eastern kerbline of the south eastern most entrance to the former Dreadnought Seaman's Hospital, King William Walk	7am - 7pm Mon - Sun	Bus, taxi, Cycle, Coach	40 - 2003
Shooters Hill - north westward with flow lane	south-west side, between a point opposite the north-western kerb-line of Red Lion Lane and a point 67.00mtrs south-east of the south-eastern kerb-line of Well Hall Road	7am - 10am Mon- Fri	Bus, Local Bus, Taxi, Cycle	50 - 2001
Trafalgar Road - north eastward with flow lane	north west side from a point opposite the party wall of Nos 125 and 127 Trafalgar Road to	3pm-7pm Mon- Sun	Buses taxi, cycle	12 - 2004

	a point 25m north-east of a point opposite the party wall of Nos. 155/157 and 159 Trafalgar Road			
Trafalgar Road - north eastward with flow lane	north west side from a point opposite the party wall of Nos 184 and 186 -188 Trafalgar Road to a point 25mtrs north-east of a point opposite the party wall of Nos. 189 and 191 Trafalgar Rd	10am -7pm Mon-Sun	Bus taxi cycle	12 - 2004
Trafalgar Road - north eastward with flow lane	the north-west side from the north-eastern kerb-line of Eastney Street to the south-western kerb-line of the access road leading to the rear of Palliser House, Trafalgar Rd	3pm-7pm Mon-Sun	Bus taxi cycle	12 - 2004
Well Hall Road - south westward with flow lane	the north-east side, from a point opposite the party wall of Nos. 12 and 14 Well Hall Road and a point opposite the north-western boundary of No. 62 Well Hall Road	4pm-7pm Mon-Fri	Bus taxi cycle	50 - 2001
Westcombe Hill north eastward	Length of carriageway that links the north east side of the south eastbound	At any time	Local bus	51 - 2012

	carriageway to the south west side of the Blackwall tunnel southern approach Nth bound exit slip road			
Westcombe Hill north westward contra flow	The south west side of the northern kerbline of Westerdale Rd to a point 61m east of the eastern kerbline of Combedale rd	At any time	Local bus	51 - 2012
Woolwich New Rd - Sth Westward with flow lane	the south east side, from the south-western kerb kerbline of Gunner Lane south-westward for a distance of 65.00 metres	At any time	Bus, Dial a Ride, Taxi	50- 2001
Woolwich Rd - westward with flow	the south side, from a point 41metres east of the eastern kerbline of Armitage Road to a point opposite the party wall of Nos. 25 and 27 Woolwich Rd	7am-7pm Mon-Sat	Buses, Local buses, Taxi, Cycles	50 - 2001

Appendix 3 - CCTV Parking - List of School Locations.

Code 48 - Stopped in a restricted area outside a school, a hospital or a fire, police or ambulance station when prohibited

NB - Where school has more than one enforceable entrance there will be multiple locations listed

School	Location
Alderwood Nursery	Alderwood Rd
Horn Park school	Alnwick Road
Greenacres Primary	Altash Way
St Patricks school	Ancona Rd
St Thomas More school	Appleton Rd
Eltham Primary	Archery Rd
Windrush Primary	Austen Close
Rockliffe Manor	Bassant Rd
Montbelle Primary	Beanshaw
Hawksmoor school	Bentham Rd
Nightingale Primary	Bloomfield Rd
Boxgrove Primary	Boxgrove Rd
South Rise Primary school	Brewery Rd
Fossdene Primary	Calydon Rd
Bannock Burn Primary & Nursery	Camrose St
Bannockburn primary	Ceres Rd
Pound Park nursery	Charlton Lane
St Josephs school	Commerell St
De Lucy Primary	Cookhill Rd
Halley Academy	Correli Rd

Gordon primary school	Craigton Rd
St Peters primary	Crescent Rd
Abbey wood nursery	Dahlia Rd
Deansfield Primary	Dairsie Rd
Ealdham Primary & nursery	Ealdham Square
Waterside primary	Earl Rise
Gordon primary school	Earlshall Road
Notre Dame Primary	Eglinton Road
Eltham Hill school	Eltham Hill
Greenslade Primary	Erindale
Thomas a' Beckett Senior school	Eynsham Drive
St Pauls Academy	Finchale Road
Timbercroft Primary	Flaxton Road
Fossdene Primary	Fossdene Rd
Cardwell Primary	Frances St
Alexander McCloud school	Fuchsia Street
Conway Primary	Gallosson Road
Plumcroft Primary	Genesta Road
Rockliffe Manor	Gilbourne Road
Deansfield Primary	Glenesk Road
St Marys school	Glenure Road
Gordon primary school	Grangehill Road
Haimo Primary	Haimo Rd
Halstow school	Halstow Road
Kidbroke Park Primary	Hargood Rd
Henwick Primary	Henwick Road

John Roan (upper)	Highmore Road
Colfes school	Horn Park Lane
Charlton Manor Primary	Hornfair Road
Bishop John Robinson school	Hoveton Road
Wyborne primary	Ivor Grove
St Mary Magdalene primary	Kingsman St
Invicta primary	Invicta Road
Woodhill Primary	Lyford St
Bannock Burn Primary & Nursery	Manton Rd
Cherry Orchard school	Marlborough Lane
John Roan Upper	Maze Hill
Rachel McMillan Nursery	McMillan Street
Brooklands Primary	Medebourne Close
Middle Park Primary	Middle Park Ave
Millenium Primary	Millenium Way
Montbelle Primary	Miverton Way
Wingfield Primary	Moorehead Way
Thomas a' Beckett primary school	Mottisfont Road
Greenwich Steiner school	Mycenae Rd
Newhaven School	Nesbit Road,
Newhaven School	Newhaven Gardens
Charlton Manor Primary	Nigeria Road,
Plumcroft Primary	Nithdale Rd
Willow Dene school	Oakmere Road
St Mary Magdalene school	Old Dover Road

Plumstead Manor school	Old Mill Rd
Meridian primary	Old Woolwich Road
Eltham primary	Orangery Lane
Eglinton Primary	Paget Rise
Plumcroft Primary	Plum Lane
Pound Park Nursery	Pound Park Road
Thorntree Primary	Pound Park Road
Gallions Mount Primary	Purrett Road
Foxfield school	Raglan Road
Alderwood School	Rainham Close
James Woolfe primary	Randall Place
Cherry Orchard	Rectory Field Crescent
Mulgrave Primary	Rectory Place
Mulgrave Primary	Rectory Place
Shooters Hill 6th form	Red Lion Lane
Alderwood primary	Restons Crescent
Waterside Primary	Robert St
Eltham primary	Roper St
Maze Hill Annex	Royal Hill
Holy Family Primary	Ryan Close
Foxfield school	Sandbach Place
Nightingale Primary	Sandy Hill Road
Sherington School	Sherington Road
St Olaves school	Southwood Road
St Margarets Primary	St. Margaret's Grove

Pointer School	Stratheden Road
Cherry Orchard school	The Glade
Thorntree Primary	Thorntree Road
Timbercroft Primary	Timbercroft Lane
John Roan (lower)	Vanbrugh Park Road West
Fossdene Primary	Victoria Way
John Roan (lower)	Westcombe Park Road
Heronsgate Primary	Whinchat Road
Eglinton Primary	Whitworth Road
Henwick primary	Winchcomb Gardens
Woodhill Primary	Woodhill
Sherington School	Wyndcliff Road

PENALTY CHARGE NOTICE (PCN)

Traffic Management Act 2004



«address»

PCN number:

«pcnno»

Date of the notice (date on which this notice was posted):

«todaysdateonly»

DO NOT IGNORE THIS NOTICE

As the registered owner/keeper/hirer, you are legally responsible for dealing with this notice. Do not pass this notice to the driver. This PCN has been served by post on the basis of a record produced by an approved device.

Contravention details

Vehicle registration mark:

«vrm»

Contravention date & time:

«issdateonly» «isstimeonly»

Location:

«streetname»

Contravention:

«contraventioncode» - «contraventiondescription»

The Royal Borough of Greenwich believes that a penalty charge issued by camera operator «shouldernumber» is payable with respect to the above vehicle for the above alleged contravention.

Images of the alleged contravention are printed on the last page of this notice.

What should you do?

You should take one of the following actions not later than the last day of the period of 28 days beginning with the date of service of this notice:

- 1) Make payment; or
- 2) Make representations.

Any representations made outside the period of 28 days beginning with the date of service of this notice may be disregarded.

1) Making payment

The amount of the penalty charge is £«fullamount» and should be paid not later than the last day of the period of 28 days beginning with the date on which this PCN is served.

However, the penalty charge is reduced by 50% to £«discountamount» if paid not later than the last day of the period of 21 days beginning with the date on which this PCN is served.

Please see the enclosed sheet "How to pay" for payment options.

Please do not make payment if you want to make representations against this penalty charge, as payment may be regarded as an acceptance of liability. See "Making representations" for details of what to do if you think that the PCN should not have been issued.

Details on how to make a representation are printed overleaf.

2) Making representations

«pcnno»

You may make representations to the council against this penalty charge if one or more of the following grounds apply and/or there are compelling reasons why, in the particular circumstances of the case, the council should cancel the penalty charge and refund any sum paid to it on account of the penalty charge. You should send your representation to the council with sufficient evidence to support your case (where applicable):

On line: www.royalgreenwich.gov.uk and follow the on-line instructions

By Post to: Parking Services, Royal Borough of Greenwich, PO Box 22152, London SE18 6WN

Please tick one or more of the following grounds if they apply:

- ☐ **The alleged contravention did not occur** – please explain why you think no contravention took place.
- ☐ **I was not the owner of the vehicle at the time** – if you sold the vehicle before the date of the contravention or bought it after the date, you must tell us the name and address of the person who bought it from you or sold it to you, if known. Please supply evidence of the sale / purchase (e.g. a sales receipt).
- ☐ **The vehicle had been permitted to remain at rest in the place in question by a person who was in control of the vehicle without the consent of the owner** – please attach evidence (e.g. police crime report, insurance claim).
- ☐ **We are a hire firm and the vehicle in question was at that material time hired under a hiring agreement; and the person hiring it has signed a statement accepting liability** – please supply a copy of the signed agreement including the name and address of the hirer.
- ☐ **The penalty charge exceeded the amount applicable in the circumstances of the case** – if you think you are being asked to pay more than you should legally pay.
- ☐ **The traffic order was invalid** – if you believe the parking restriction in question was invalid or illegal.
- ☐ **There has been procedural impropriety on the part of the enforcement authority** – please describe the alleged impropriety.
- ☐ **The penalty charge has already been paid in full or has been paid at the reduced amount within the specified period** – please provide details verifying that the payment was made before the PCN had been served.

Please enter details of your representations:

(...please continue on another sheet if necessary)

I confirm that the above and/or attached information is correct to the best of my knowledge. I understand that making a false statement may result in prosecution and a possible fine of up to £5,000.

Signature:	Name (BLOCK CAPITALS):
Date:	Position in company (if applicable):

What happens next?

If you pay the required amount in full, the case will be closed.

If you make representations, we will write to you with our decision within the period of 56 days beginning with the date on which we receive your representations. If we accept your representations, we will cancel the penalty and send you a letter of confirmation. If we do not accept them, you will have a period of 28 days beginning with the date of service of the notice of rejection to pay the penalty charge or appeal against our decision to an independent adjudicator at the Environment & Traffic Adjudicators service. The adjudicator will then reconsider the case and make a decision based on

the evidence provided. We will tell you how to do this when we write to you.

If after the last day of the period of 28 days beginning with the date of service of this notice neither payment nor representations are received, the council may increase the charge by 50% to £«ccamount» and may serve a charge certificate (at which time any representations made against the penalty charge may be disregarded).

How to pay

Online: – Please go to www.royalgreenwich.gov.uk and follow the on-line instructions

By Post: Complete the payment slip below and make cheque/postal order payable to Royal Borough of Greenwich for the full amount due and return both payment slip and payment to **Parking Services, Royal Borough of Greenwich, PO Box 4773, London SE18 6YD.**

Please do not send post-dated cheques, as they will not be accepted. Do not send cash through the post. Unstamped envelopes will not be delivered.

In person: By cash, postal order, cheque or debit/credit card at Royal Greenwich cash offices.

By Telephone - credit/debit cards: On an automated payment line, 24 hours 7days a week, on 0300 332 0202

Please do not make payment if you want to challenge this Penalty Charge

Further information

Online

For further information please visit www.royalgreenwich.gov.uk

By Telephone

Please call us on 0208 921 4339 - 9am-5pm Monday – Friday.

✂-----DETACH HERE-----

Payment slip

PCN number:

«pcnno»

Vehicle registration mark:

«vrm»

Payment type (please tick):

☐ Cheque ☐ Postal order ☐ Bank draft

Title..... First name(s)..... Surname.....

Address.....

.....

Postcode..... Daytime telephone number.....

DATA PROTECTION INFORMATION

Personal data has been collected by Royal Borough of Greenwich in order to serve this Penalty Charge Notice and enforce parking contraventions under the Traffic Management Act 2004. As we believe a contravention has occurred, your personal data may be

collected, processed, shared and retained in order to carry out the performance of a public task and fulfil our legal obligations in the following ways:

- To request details of the registered keeper of the vehicle from the DVLA or the person/ company we believe to be the owner of the vehicle in order to pursue a Penalty Charge Notice
- Shared with third parties for appeals and enforcement. London Councils, London Tribunals, Northgate Public Services (UK) Limited, The Traffic Enforcement Centre and our contracted Enforcement Agents and Cashless Parking Provider.
- Shared with the police or security organisations to prevent or detect crime.
- Shared with other local authorities and other government agencies in connection with investigation to help prevent unlawful activity and fraud.
- Data will be stored for a period of 6 years or as long as cases remain outstanding.

What are your Data Rights

In relation to the personal data which we may hold about you, you have the right to be:

- Informed about the collection and use of your personal data
- Right to request access
- Ask for errors to be corrected
- Restrict how your information is used
- Object to how it is processed
- Request that your data is deleted.

Under Data Protection law we must verify your identity and explain to you our reasons if we do not agree to carry out your request.

Contact and Further Information

If you would like more information about how we use your data, please read our Privacy Policy by visiting the Royal Greenwich website or copy the following URL into the browser address window: https://www.royalgreenwich.gov.uk/directory_record/520484/parking
Data protection questions can be made via telephone on 020 8921 2383, by email to data.protection@royalgreenwich.gov.uk or in writing to Corporate Data Guardian, The Woolwich Centre, Third Floor, 35 Wellington Street, London SE18 6HQ

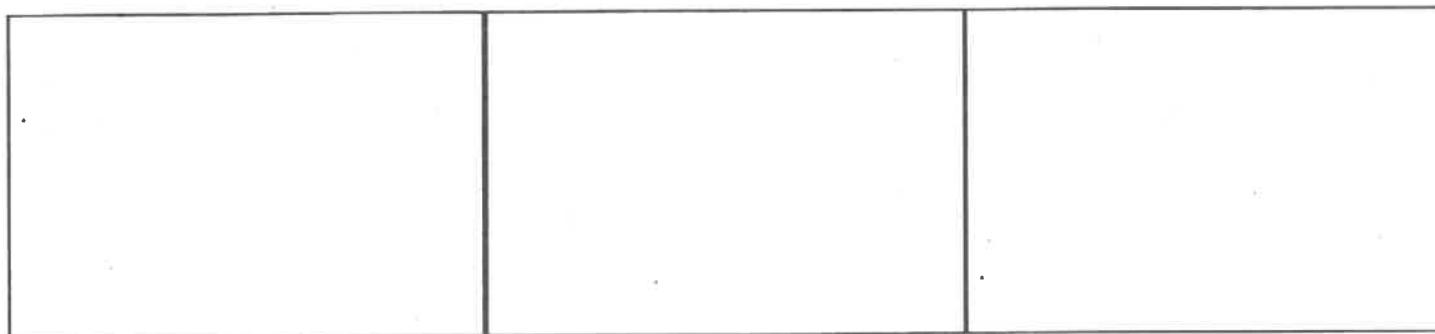
You have the right to complain to the Information Commissioner's Office at www.ICO.org.uk.

Evidence

«pcnno»

«vrm»

Below are photographic images taken from the record of the contravention produced by an approved device pursuant to which this penalty charge was imposed:



You can view the record (evidence) of the contravention or additional images at the following website www.royalgreenwich.gov.uk/pcn you will need the penalty charge notice number and vehicle registration mark to do this.

The recipient of this penalty charge notice may request, by notice in writing to: **Parking Services, Royal Borough of Greenwich, PO Box 22152, London SE18 6WN** or by email to: parking@royalgreenwich.gov.uk (please ensure you quote the penalty charge notice number and vehicle registration mark)

a) to make available one of its offices specified by you, free of charge and at a time during normal office hours (9am to 5pm, Monday to Friday), for viewing by you or by your representative, the record of the contravention produced by the approved device pursuant to which the penalty charge was imposed; or

b) to provide you, free of charge, with such still images from that record as, in the authority's opinion, establish the contravention.

If you make such a request, the Royal Borough of Greenwich shall comply within a reasonable time. **However, please note that requesting a viewing or more images, does not place the penalty charge on hold.**

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PENALTY CHARGE NOTICE (PCN)

Road Traffic Regulation Act 1984 (as amended)
London Local Authorities Act 1996 (as amended)



«address»

PCN number:

«pcnno»

Date of this notice:

«todaysdateonly»

DO NOT IGNORE THIS NOTICE

As the registered owner/keeper/hirer, you are legally responsible for dealing with this notice. Do not pass this notice to the driver.

Contravention details

Vehicle registration mark:

«vrm»

Contravention date & time:

«issdateonly» «isstimeonly»

Location:

«streetname»

Contravention:

«contraventioncode» - «contraventiondescription»

The Royal Borough of Greenwich believes that a penalty charge issued by camera operator «shouldernumber» is payable with respect to the above vehicle for the above alleged contravention.

Images of the alleged contravention are printed overleaf.

What should you do?

You should take one of the following actions before the end of the period of 28 days beginning with the date of this notice:

- 1) Make payment; or
- 2) Make a challenge.

If the penalty charge is not paid before the end of the period of 28 days beginning with the date of this notice, an enforcement notice may be served by the council on the person who appears to them to be the owner of the vehicle. The enforcement notice will allow formal representations on the following grounds:

- The recipient was not the owner at the time (*liability cannot be transferred if hired for less than six months*)
- The vehicle was taken without the owner's consent
- The contravention did not occur
- The police are already taking action

1) Making payment

The amount of the penalty charge is £«fullamount» and should be paid before the end of the period of 28 days beginning with the date of this notice.

However, the penalty charge is reduced by 50% to £«discountamount» if paid before the end of the period of 14 days beginning with the date of this notice.

Please see the enclosed sheet "How to pay" for payment options.

2) How to challenge

«pcnno»

If you do not believe this penalty charge should have been issued, you should write to us with any supporting evidence by post or on-line:

On line: www.royalgreenwich.gov.uk and follow the on-line instructions

By Post to: Parking Services, Royal Borough of Greenwich, PO Box 22152, London SE18 6WN

If you write to us within 14 days of the date of this notice and we do not accept your challenge, we will give you another 14 days in which to pay the discounted amount.

Evidence

«vrm»

Below are photographic images taken from the record of the contravention produced by a fixed camera.

If you or a representative would like to view the record (evidence) of the contravention or additional images you can do this at the following website www.royalgreenwich.gov.uk/pcn you will need the penalty charge notice number and vehicle registration mark to do this.

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How to pay

Online: – Please go to www.royalgreenwich.gov.uk and follow the on-line instructions

By Post: Complete the payment slip below and make cheque/postal order payable to Royal Borough of Greenwich for the full amount due and return both payment slip and payment to **Parking Services, Royal Borough of Greenwich, PO Box 4773, London SE18 6YD**

Please do not send post-dated cheques as they will not be accepted. Do not send cash through the post. Unstamped envelopes will not be delivered.

In person: By cash, postal order, cheque or debit/credit card at Royal Greenwich cash offices.

By Telephone - credit/debit cards: On an automated payment line, 24 hours 7days a week, on 0300 332 0202

Please do not make payment if you want to challenge this Penalty Charge

Further information

Online

For further information please visit www.royalgreenwich.gov.uk

By Telephone

Please call us on 0208 921 4339 - 9am-5pm Monday - Friday.

DATA PROTECTION INFORMATION

Personal data has been collected by Royal Borough of Greenwich in order to serve this Penalty Charge Notice and enforce contraventions under the Road Traffic Regulation Act 1984 (as amended) & London Local Authorities Act 1996 (as amended). As we believe a contravention has occurred, your personal data may be collected, processed, shared and retained in order to carry out the performance of a public task and fulfil our legal obligations in the following ways:

- To request details of the registered keeper of the vehicle from the DVLA or the person/ company we believe to be the owner of the vehicle in order to pursue a Penalty Charge Notice
- Shared with third parties for appeals and enforcement. London Councils, London Tribunals, Northgate Public Services (UK) Limited, The Traffic Enforcement Centre and our contracted Enforcement Agents and Cashless Parking Provider.
- Shared with the police or security organisations to prevent or detect crime.
- Shared with other local authorities and other government agencies in connection with investigation to help prevent unlawful activity and fraud.
- Data will be stored for a period of 6 years or as long as cases remain outstanding.

What are your Data Rights

In relation to the personal data which we may hold about you, you have the right to be:

- Informed about the collection and use of your personal data
- Right to request access
- Ask for errors to be corrected
- Restrict how your information is used
- Object to how it is processed
- Request that your data is deleted.

Under Data Protection law we must verify your identity and explain to you our reasons if we do not agree to carry out your request.

Contact and Further Information

If you would like more information about how we use your data, please read our Privacy Policy by visiting the Royal Greenwich website or copy the following URL into the browser address window: https://www.royalgreenwich.gov.uk/directory_record/520484/parking
Data protection questions can be made via telephone on 020 8921 2383, by email to data.protection@royalgreenwich.gov.uk or in writing to Corporate Data Guardian, The Woolwich Centre, Third Floor, 35 Wellington Street, London SE18 6HQ

You have the right to complain to the Information Commissioner's Office at www.ICO.org.uk.

✂-----DETACH HERE-----✂

Payment slip

PCN number:

«pcnno»

Vehicle registration mark:

«vrm»

Payment type (*please tick*):

☐ Cheque ☐ Postal order ☐ Bank draft

Title..... First name(s)..... Surname.....

Address.....

.....

Postcode..... Daytime telephone number.....

PENALTY CHARGE NOTICE (PCN)

London Local Authorities and Transport for London Act 2003



«address»

PCN number:

«pcnno»

Date of this notice:

«todaysdateonly»

DO NOT IGNORE THIS NOTICE

As the registered owner/keeper/hirer, you are legally responsible for dealing with this notice. Do not pass this notice to the driver.

Contravention details

Vehicle registration mark:

«vrm»

Contravention date & time:

«issdateonly» «isstimeonly»

Location:

«streetname»

Contravention:

«contraventioncode» - «contraventiondescription»

The Royal Borough of Greenwich believes that a penalty charge issued by camera operator «shouldernumber» is payable with respect to the above vehicle for the above alleged contravention.

Images of the alleged contravention are printed on the last page of this notice.

What should you do?

You should take one of the following actions:

- 1) Make payment before the end of the period of 28 days beginning with the date of this notice; or
- 2) Make representations before the end of the period of 28 days beginning with the date of service of this notice.

Any representations received after the period of 28 days beginning with the date service of this notice may be disregarded.

1) Making payment

The amount of the penalty charge is £«fullamount» and should be paid before the end of the period of 28 days beginning with the date of this notice.

However, the penalty charge is reduced by 50% to £«discountamount» if paid before the end of the period of 14 days beginning with the date of this notice.

Please see the enclosed sheet "How to pay" for payment options.

2) Making representations

«pcnno»

If you believe you have good reason not to pay the charge, you should write to us explaining why. You should ensure the council receives your representations before the end of the period of 28 days beginning with the date of service of this notice. Please indicate on which grounds you wish to make representations by ticking the appropriate box below. Give details supporting your representations in the space provided below and send it along with supporting evidence (where applicable) to:

On line: www.royalgreenwich.gov.uk and follow the on-line instructions

By Post to: Parking Services, Royal Borough of Greenwich, PO Box 22152, London SE18 6WN

Please tick one or more of the following grounds if they apply:

- ☐ **I was not the owner of the vehicle at the time of the contravention** – if you sold the vehicle before or bought the vehicle after the date of the contravention, supply the full name and address of the person/company whom you bought it from or sold it to, together with the date of exchange. Also supply whatever evidence of the sale you may have (such as a sales invoice/cancellation of insurance etc.).
- ☐ **There was no contravention of an order or failure to comply with an indication on a sign** – please give an explanation of why you think the contravention did not take place.
- ☐ **The vehicle was being used without my consent** – provide details of the police crime reference number or insurance claim.
- ☐ **We are a hire company and the hirer had signed a statement accepting liability** – supply a copy of the signed agreement and the name and address of the hirer in the space below.
- ☐ **The penalty charge exceeded the amount applicable in the circumstances of the case** – tick this box if you think you are being asked to pay more than you should legally pay and give your reasons below.

If your reason does not fall into any of the above categories, you should still write to us with as much information and supporting documents as possible. Although there are specific legal grounds for making representations, we will consider exercising our discretion and may cancel the penalty charge if there are suitable mitigating circumstances (i.e. if we believe that there is a good enough reason).

Please enter details of your representations:

(...please continue on another sheet if necessary)

I confirm that the above and/or attached information is correct to the best of my knowledge. I understand that making a false statement may result in prosecution and a possible fine of up to £5,000.

Signature:	Name (BLOCK CAPITALS):
Date:	Position in company (if applicable):

What happens next?

After we have considered your representations we will write to you with our decision. If we accept your representations, we will cancel the penalty charge. If we do not accept them, you will have a further 28 days to either pay the charge or to appeal against our decision to an independent adjudicator at the Environment & Traffic Adjudicators Service. We will tell you how to do this when we write to you.

If you do not pay before the end of the period of 28 days beginning with the date of this notice or make representations before the end of the period of 28 days beginning with the date of service of this notice, the charge may increase to £«ccamount» and the council may serve a charge certificate. It will then be too late to challenge the penalty.

How to pay

Online: – Please go to www.royalgreenwich.gov.uk and follow the on-line instructions

By Post: Complete the payment slip below and make cheque/postal order payable to Royal Borough of Greenwich for the full amount due and return both payment slip and payment to **Parking Services, Royal Borough of Greenwich, PO Box 4773, London SE18 6YD.**

Please do not send post-dated cheques, as they will not be accepted. Do not send cash through the post. Unstamped envelopes will not be delivered.

In person: By cash, postal order, cheque or debit/credit card at Royal Greenwich cash offices.

By Telephone - credit/debit cards: On an automated payment line, 24 hours 7days a week, on 0300 332 0202

Please do not make payment if you want to challenge this Penalty Charge

Further information

Online

For further information please visit www.royalgreenwich.gov.uk

By Telephone

Please call us on 0208 921 4339 - 9am-5pm Monday - Friday.

✂-----DETACH HERE-----✂

Payment slip

PCN number:

«pcnno»

Vehicle registration mark:

«vrm»

Payment type (please tick):

☐ Cheque ☐ Postal order ☐ Bank draft

Title..... First name(s)..... Surname.....

Address.....

Postcode..... Daytime telephone number.....

DATA PROTECTION INFORMATION

Personal data has been collected by Royal Borough of Greenwich in order to serve this Penalty Charge Notice and enforce parking contraventions under the London Local Authorities and Transport for London Act 2003. As we believe a contravention has occurred, your personal data may be collected, processed, shared and retained in order to carry out the performance of a public task and fulfil our legal obligations in the following ways:

- To request details of the registered keeper of the vehicle from the DVLA or the person/ company we believe to be the owner of the vehicle in order to pursue a Penalty Charge Notice
- Shared with third parties for appeals and enforcement. London Councils, London Tribunals, Northgate Public Services (UK) Limited, The Traffic Enforcement Centre and our contracted Enforcement Agents and Cashless Parking Provider.
- Shared with the police or security organisations to prevent or detect crime.
- Shared with other local authorities and other government agencies in connection with investigation to help

prevent unlawful activity and fraud.

- Data will be stored for a period of 6 years or as long as cases remain outstanding.

What are your Data Rights

In relation to the personal data which we may hold about you, you have the right to be:

- Informed about the collection and use of your personal data
- Right to request access
- Ask for errors to be corrected
- Restrict how your information is used
- Object to how it is processed
- Request that your data is deleted.

Under Data Protection law we must verify your identity and explain to you our reasons if we do not agree to carry out your request.

Contact and Further Information

If you would like more information about how we use your data, please read our Privacy Policy by visiting the Royal Greenwich website or copy the following URL into the browser address window: https://www.royalgreenwich.gov.uk/directory_record/520484/parking

Data protection questions can be made via telephone on 020 8921 2383, by email to data.protection@royalgreenwich.gov.uk or in writing to Corporate Data Guardian, The Woolwich Centre, Third Floor, 35 Wellington Street, London SE18 6HQ

You have the right to complain to the Information Commissioner's Office at www.ICO.org.uk.

Evidence

«pcnno»

«vrm»

Below are photographic images taken from the record of the contravention produced by a fixed camera.

If you or a representative would like to view the record (evidence) of the contravention or additional images you can do this at the following website www.royalgreenwich.gov.uk/pcn you will need the penalty charge notice number and vehicle registration mark to do this.

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