



# London Lorry Control Scheme **Review** 2017

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**LONDON  
COUNCILS**

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# Introduction



London is the largest city in Western Europe with a population of more than 8.6 million (2015) that is expected to increase to 10 million by 2031. This will create significant additional demand for passenger and freight transport on what is already a highly congested road network.

The success of London as a lively, prosperous and diverse city is dependent on many factors and the effective management of freight is a key element in ensuring that London continues to grow as a major business, tourist attraction and residential centre.

One such method of controlling freight movement is the London Lorry Control Scheme (LLCS).

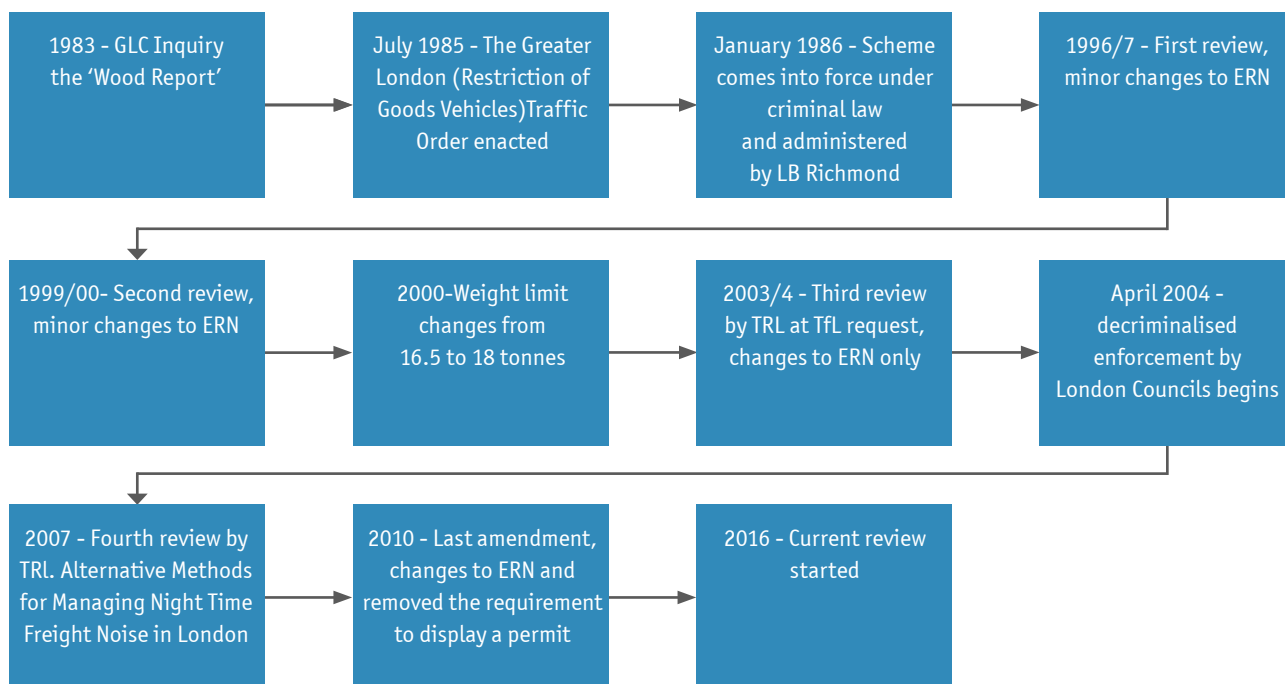
This report outlines the historical background to the introduction of the LLCS in 1986, why the scheme exists and how it currently operates in London. The report goes on to explain the reasons why London Councils is undertaking a comprehensive review of the scheme and how this will be achieved. It identifies the views and issues raised by key stakeholders during the review and how the scheme may be updated to meet the expanding needs of London as a modern 21st century city.

The report includes a series of recommendations based on the evidence collected from a number of meetings, workshops and surveys involving the stakeholders.



# Background to the London Lorry Control Scheme

Figure 1: Outline history of the scheme



In 1983, as a result of persistent complaints from Londoners about the disturbance caused by larger Heavy Goods Vehicles (HGVs) at night times and weekends, the Greater London Council (GLC) set up an independent inquiry into the 'Effects of Bans on Heavy Lorries in London'. The subsequent report, often referred to as the 'Wood Report' concluded that:

- London was exceptionally exposed to traffic noise (with the heaviest lorries being the noisiest)
- Most night time and weekend lorry movements were by the heaviest and noisiest vehicles
- Existing local bans were difficult to enforce and where they were effective, only served to transfer the issues into adjoining, neighbouring areas
- Lorries should be made quieter

A ban (or control) would be more likely to succeed if controlled by some form of exemption system.

The GLC acted on the evidence provided in the Wood Report and in 1985 made the Greater London (Restriction of Goods Vehicles) Traffic Management Order (TMO) which was implemented in January 1986.

This TMO has been the subject of several minor revisions since 1985 and the current version can be seen in Appendix 1.

In 1986, under criminal law, the 'London Lorry Control Scheme' was implemented and the London Borough of Richmond administered the enforcement of it, on behalf of London.

The LLCS is an environmental measure designed to protect the residents of London against the disturbance caused by HGVs at certain times. As well as minimising the environmental impact of HGVs, especially in

densely populated residential areas, the scheme aims to reduce unnecessary through traffic, while ensuring that London's economic activity continues.

The principle behind the scheme was that HGVs could have full access to roads known as the 'Excluded Road Network' (ERN) at any time without obtaining a 'permission' to do so. However, other roads known as 'restricted roads' were restricted during the hours of the scheme (evenings and weekends). Freight operators required a permit (now a permission) to use these restricted roads and were committed to using the ERN as much as possible, only leaving this at the closest point to their destination (see Appendix 2 for a map of the LLCS area).

The criteria for defining an excluded road is not just based on strategic routes but also on roads that are of a non-strategic (residential) nature, facilitating movement to and around industrial and commercial areas. Such routes must be physically and environmentally suitable for HGVs.

The ERN has been reviewed periodically since 1985 in order to take account of changes, such as new roads and developments, as well as to take account of the Greater London Authority Act 1999 which had the effect of de-trunking all trunk roads in London. The last update of the ERN took place in 2010.

Originally, when the TMO was created, the HGV weight limit had been set at 16.5 tonnes (T) maximum gross weight (MGW). However, in 2000 this was revised to 18T MGW to take account of vehicle design and legislative changes.

For practical enforcement purposes, 18T (MGW) is also the maximum weight for two axle HGVs (which are not covered by the scheme), allowing effective and identifiable enforcement of any HGV that has three axles or more.

The hours of operation for LLCS controls are:

- Monday – Friday 9pm to 7am (including 9pm Friday night to 7am Saturday morning)
- Saturday – 1pm to 7am Monday morning
- Normal restrictions apply during public and bank holidays.

In April 2004, enforcement of the scheme was decriminalised under the London Local Authorities and Transport for London (LLA & TfL) Act 2003 and London Councils assumed responsibility on behalf of the Transport and Environment Committee (TEC), a joint committee of the 32 London Boroughs, the City of London (CoL) and Transport for London (TfL).

# The scheme as it is today

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The LLCS has been in operation for over 30 years and has operated under decriminalised enforcement for the last 13 years.

Currently, the scheme covers the whole of the Greater London area so that all ‘non-London’ traffic is diverted onto the M25. The exception to this is the London Borough of Barnet where the scheme does not apply. LB Barnet was removed from the provisions of the TMO following an amendment order in 1996. This was largely due to the local introduction of a significant network of 7.5 tonne weight restrictions within Barnet, which they believed at the time reduced the requirement to be a member of the LLCS.

The administration of both the permissions and enforcement process is undertaken by London Councils as a function of TEC’s delegated authority from the London boroughs and London-wide enforcement of the scheme is contracted out to a civil enforcement service provider, who employs a dedicated team of on-street Enforcement Officers (EOs).

As part of the back office administration service, it should be noted that London Councils also offer free routing advice to the operators on request via phone and email.

## a. The permission

Since 2010, London Councils have been issuing ‘virtual’ permissions instead of physical permits which are valid for three years.

The permission can be obtained free of charge by completing an online application form on London Councils’ website. Each individual vehicle that is registered to the scheme, provided that the vehicle operator evidences a requirement to use restricted roads and can demonstrate an understanding of the scheme will be granted a permission.

A permission will not be issued if the journey on restricted roads is not essential in the course of necessary business.

Once registered, the vehicle operator has access to London Councils’ Permissions Database of Registered Vehicles and using a personal login, they are able to add and delete vehicles as and when required.

## b. Permission conditions

There is a requirement for vehicle operators as part of the ‘permission conditions’ that they must minimise the use of restricted roads, only leaving the ERN at the closest point to their destination. Vehicle operators with essential business on restricted roads who have obtained a permission must agree to these conditions (see Appendix 3 for the permission conditions).

## c. Enforcement

The LLCS is enforced under the LLA & TfL Act 2003 much the same way as moving traffic contraventions are enforced in London; however there are two main differences:

- Penalty Charge Notices (PCNs) can be issued to both the vehicle operator and the driver. These are currently £550 for the operator and £130 for the driver (discounted by 50% if paid within 14 days)

- Vehicles with permission that are observed by the EOs on restricted roads may receive an 'Enquiry Letter' (EF119) requesting justification for leaving the ERN. If the evidence does not support a requirement to be at the observed location, then London Councils may issue a PCN

Since 2014, the scheme has been self-financing, meaning there are no additional costs for boroughs with respect to the administration and enforcement of the scheme.

#### d. Key facts and statistics

Statistical analysis of the data from 2015/16 indicates the following:

- **3,900** vehicle operators are registered with the scheme
- **68,000** vehicle registration marks are registered on the LLCS permissions database
- EOs observed and logged **14,459** vehicles in potential breach of the terms and conditions of the scheme
- London Councils issued **10,052** EF119s to permitted vehicle operators in relation to the observations outlined above
- London Councils issued **5,138** PCNs to vehicle operators
- **898** PCNs were issued to drivers during the same period
- The payment rate of PCNs issued during 2015/16 stands at **69%**
- In 2015/16 gross 'revenue' from PCNs totalled **£1,065,885**

Location	PCNs issued
Southwark Bridge Road SE1	62
Camden Road NW1	55
Grosvenor Road SW1	44
Farnborough Way BR6	42
City Road EC1	41
Harlington Road West J/W Staines Road TW14	37
Blackheath Road SE10	36
Craven Park NW10	36
New Cross Road SE14	36
Bushey Road (j/w Grand Drive)	34
West Cromwell Road j/w Earls Court Road SW5	34
Pagnell Street J/W Edward Street SE14	32
Camden Road N7	31
Shooters Hill Road SE10	31
Southwark Street SE1	28
Woolwich Common SE18	28
Bushey Road j/w Martin Way	27
Lea Bridge Road	27
Gravel Hill Bexley Kent	26
Faggs Road j/w Hatton Green	26

Figure 2: Permission Applications 2015/16

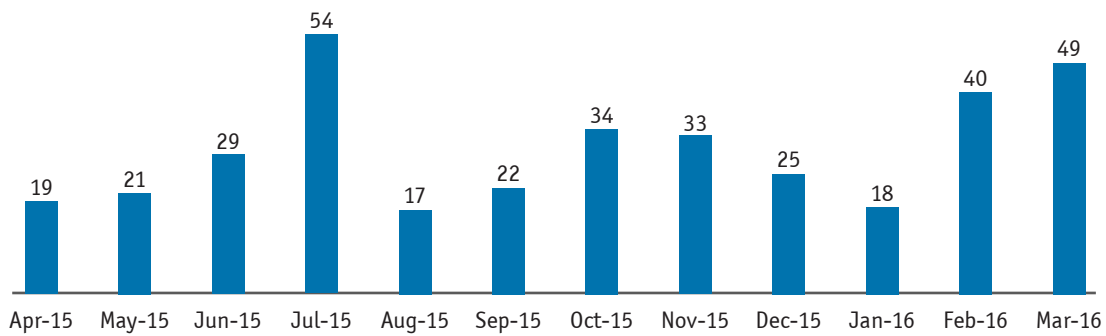
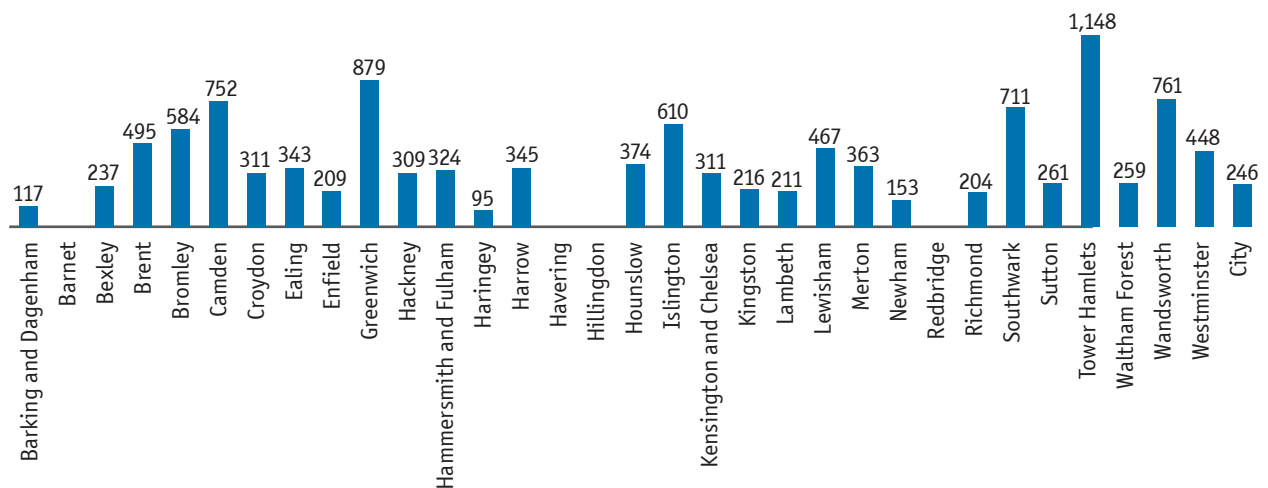


Figure 3: Observations by borough 2015/16



Total: 11,743





Figure 4: **Order for Recovery 2015/16**

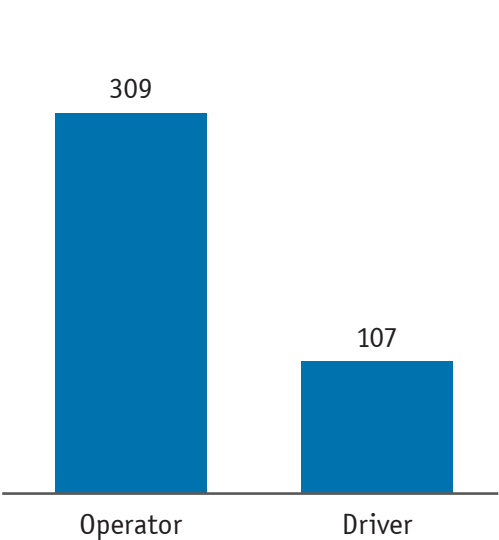


Figure 5: **Warrant Issue 2015/16**

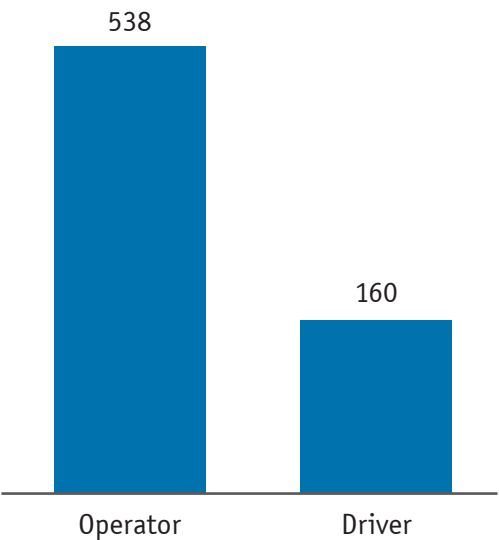


Figure 6: **PCN issue 2015/16**

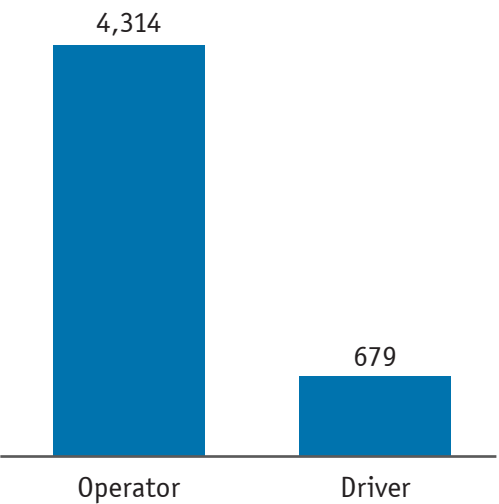
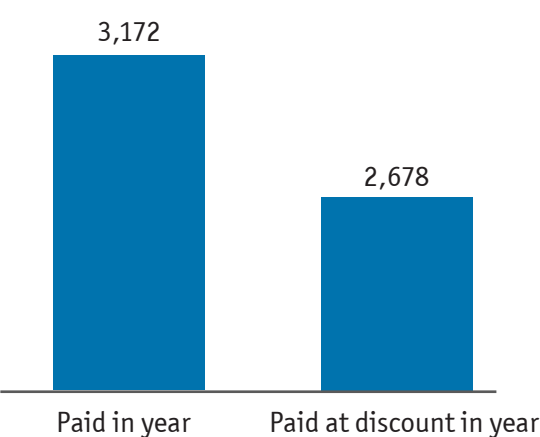


Figure 7: **PCN paid 2015/16**



# Reasons for the Review of the LLCS

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In the 30 years of its operation, there has not been a large scale review assessing whether the scheme, in its current form is fit for purpose and therefore continues to meet the needs of Londoners.

In December 2015, TEC agreed London Councils should form a Working Group to review the LLCS, its purpose and the impact it has on delivering goods and services in London. Any review would also analyse the initial objectives of the scheme to establish whether these are still relevant in a 24 hour city, such as London is today.

Boroughs have confirmed that the scheme is an effective way of controlling freight movement and would like to see it remain. Abandoning the scheme altogether would see an increase in unnecessary freight traffic that has no purpose to be in London at night times and weekends which would add to noise pollution and congestion. Boroughs have also indicated that it in the absence of a co-ordinated London wide scheme, it is likely that there would be a significant increase in local restrictions. This could result in a variety of uncoordinated measures that would be more confusing and even more restrictive for operators without providing the consistency in approach required in managing freight movements across London.

The main reasons for the review are identified as follows:

## **a. Assess the effectiveness of the scheme**

Since London Councils have not undertaken a comprehensive review of the scheme to date, it is important to assess the extent to which the LLCS continues to achieve its aims in controlling freight movement in London, whilst delivering Londoners a better quality of life with respect to quieter night time and weekend deliveries.

We need to ascertain what impact the scheme has had on the freight industry and businesses in London and consider whether it is a significant barrier in facilitating the ambitions of encouraging more off peak deliveries across the city. It is also important to understand how the scheme fits in with other existing controls such as the Low Emissions Zone (LEZ) and Safer Lorry Scheme (SLS), and what impacts it has with respect to air quality, congestion and road traffic safety in our city.

## **b. Consider and address concerns**

It is important to listen to the views of all key stakeholders including those from the freight industry, residents groups, London boroughs and businesses. London Councils are aware that the freight industry has long viewed the LLCS as an unnecessary inconvenience to their members, which has an impact on operating costs, time and nature of deliveries in London.

To undertake effective analysis we need to fully comprehend the nature of these concerns and their impact, and consider what measures can be taken to mitigate these without having a negative impact on London residents. It is also important to address the concerns of boroughs who work on behalf of their residents, to assess what concerns they have over existing freight movements and how any revisions to the scheme may impact this and potentially lead to an increase in more localised restrictions.

## **c. Propose amendments and future actions**

A key aim of the review was to develop recommendations for change and improvement. Many of these will be short term measures, such as improving customer engagement, which can be implemented relatively quickly without the need for further research.

Other, perhaps more fundamental recommendations looking at the rules of the scheme 'on-street' will require further engagement, consultation and research, (details of these recommendations are contained in later sections of this report).

#### **d. Raise awareness**

By improving awareness of both the LLCS and the importance of road freight to service London, we expect to achieve a greater understanding from all parties interacting with the scheme. This should improve compliance and increase public awareness. Key questions include:

- What is the current understanding of the scheme?
- Do vehicle operators in London know what the scheme is, how it works and who administers it?
- Are the public aware that there is a scheme in London that controls the movement of HGV traffic during 'unsociable' hours?
- Do the public know the importance of freight movement in ensuring that the goods and services that they demand are delivered when they want them?

#### **e. Improve compliance**

The key element with any scheme which sets out to control behaviour by use of a penal enforcement regime is to maximise compliance. Current understanding of the compliance levels is not clear therefore, more research is needed on existing compliance levels and how these can be improved.

Data on the routes that are currently taken, volumes of traffic subject to the scheme and how the LLCS impacts the decisions the freight operators take, is vital in ensuring that any recommendations made regarding the future of the scheme are the right ones.

#### **f. Better control of freight in London**

Freight deliveries are essential in ensuring that the demand for goods and services in London can be met. It is important that this can be undertaken with minimum disruption to all parties. Freight in London needs to be managed effectively and efficiently, maximising delivery windows and taking advantage of out of hour deliveries where possible, to free up space during peak times on a congested network.

Analysis of how the LLCS impacts deliveries and how it fits in with existing freight management schemes needs to be considered.

In order to add focus to the review, London Councils established a Steering Group and a larger Working Group made up of key stakeholders to discuss the operational details of the scheme. Both the Steering Group and Working Group are chaired by London Councils.

# The Steering Group

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The Steering Group provided a strategic overview of the aims of the review, setting out timescales, reporting structure and strategy. It was made up of the following members:

- London Councils
- Transport for London
- Greater London Authority
- City of Westminster
- London Borough of Croydon

The first Steering Group meeting took place on 24 October 2016 and agreed a set of Terms of Reference for the review (see Appendix 4). The group met bi-monthly at London Councils' offices.

The Steering Group agreed that the review needed to cover the following aspects:

## **The hours of operation**

- Are these fit for purpose?
- Is there evidence available regarding traffic flow, freight movement and delivery times that suggest that this could change or does this need to be gathered?
- Do we need case studies to evidence this?

## **Current weight limits or enforcement methodology**

- Is this weight limit fit for purpose?
- Are there opportunities in enforcing in a different way depending on the information we are able to gather e.g. vehicle noise levels from DVLA which could be independent of weight limits?
- Currently the scheme does not cover two axle 'skip lorries' which are possibly the noisiest vehicles on the road.
- Could there be a way to capture such vehicles?

## **ERN update**

The ERN has not been reviewed since 2010, so this needs to happen as a matter of course. Road layouts have changed, new roads have been introduced and others removed from major arterial routes.

- Should the current ERN be re-assessed in accordance with local decision making procedures?

## **On-street enforcement**

- Is the use of dedicated on-street EOs the best way to enforce the scheme?
- Could the use of CCTV and Automatic Number Plate Recognition (ANPR) assist London Councils in ensuring improved compliance as part of a range of enforcement activities?

## **Fine levels**

- Are the current fine levels fit for purpose?
- Is there an appetite for change or would any proposed change be met with opposition from Central Government?

## **Signs**

- Are the current signs fit for purpose and at the correct locations?
- Would any future amendments to the scheme require wholesale and costly amendments to existing signs?
- Are signs important to drivers?
- Could the scheme be signed differently, therefore reducing the need for signs at numerous locations and reducing street clutter?
- Could the scheme be administered without the requirements of on-street signs?

## **Improving communications and understanding of the scheme**

- Should we be publicising the scheme more, if so, how?
- Should we meet regularly with operators to explain restrictions and routing?
- What are the barriers?

Previous face to face meetings with vehicle operators has resulted in improvements in compliance.

## **Permission Conditions**

These need to be reviewed as part of an LLCS review.

- Are they fit for purpose?
- Should we be using more of the conditions we have but do not currently enforce?
- Should we enforce against permissions that we do not currently enforce against?
- Should more permissions be added?

## **Vehicle exemptions**

- Are the current exemptions in the TMO fit for purpose?
- Should the scheme apply to operators using the quietest vehicles, how can this be certified?
- Should there be any other vehicle exemptions added to the TMO?

## **Routing**

- Should London Councils provide routes for all operators as a matter of course?
- Should London Councils provide specific routes for specific journeys?
- Is there a way (for free) that operators can get a route without direct contact with LLCS staff that is owned and maintained by London Councils, perhaps in partnership with another agency?



## **Apps**

- In collaboration with technology partners, should London Councils produce an 'App' with interactive maps of the LLCS which can display details of compliant routes in real time to operators?
- Could this form part of satellite navigation systems?

## **Administration of the scheme**

- Could this be made more efficient and simpler?
- Could the current administrative burden on both London Councils and vehicle operators be reduced e.g. the current enquiry letter process?
- Is the current permission duration of three years still acceptable?
- Is there scope to increase or decrease it?

## **Flexibility in routing**

London Councils is aware of the pressures on operators and will often take a flexible approach when routing if the 'detour' distance in making a compliant journey is substantial

- Should this continue and be formally documented as part of any review?
- Are the considerations for 'special routing' still applicable?

## **Cost of a revised TMO**

Any revision to the TMO requires a public consultation and significant resources to complete, as well as publication of the revision in local papers at an approximate cost of £15,000.

For example:

### **Hours of operation**

*Are these fit for purpose?*

*Is there evidence available regarding traffic flow, freight movement and delivery times that suggest that this could change or does this need to be gathered?*

*Do we need case studies to evidence this?*

### **Current weight limits or enforcement methodology**

*Is the weight limit fit for purpose?*

*Are there opportunities in enforcing in a different way depending on the information we are able to gather e.g. vehicle noise levels from DVLA which could be independent of weight limits?*

*Currently the scheme does not cover two axle 'skip lorries' which are possibly the noisiest vehicles on the road.*

*Could there be a way to capture such vehicles?*

# The Working Group



**North Sub-Regional  
Partnership**

- London Councils
- Transport for London (TfL)
- London Borough of Camden
- London Chamber of Commerce
- Federation of Small Businesses (FSB)
- Freight Transport Association (FTA)
- Road Haulage Association (RHA)
- British Beer and Pub Association
- Mineral Products Association
- Noise Abatement Society
- London First
- Campaign for Better Transport
- Residents Groups Representation
- WestTrans
- South London Partnership
- Central London Freight Quality Partnership
- North Sub-Regional

The main aim for the Working Group was to discuss and explore the different areas within the scope of the review as outlined by the Steering Group and the Terms of Reference in more detail. Four Working Group meetings were held, each focusing on an identified area:

### **1. Effectiveness of the scheme**

- Awareness (wider public, residents and operators)
- Noise management
- Compliance levels and other performance measures
- Integration with other schemes and initiatives

### **2. Restrictions**

- Extent of ERN and restricted roads
- 18T weight limit
- Hours of operation
- Permissions
- Exemptions

### **3. Enforcement**

- Enforcement practice and methods
- Signage
- PCNs, Representations and Appeals
- Awareness and publicity

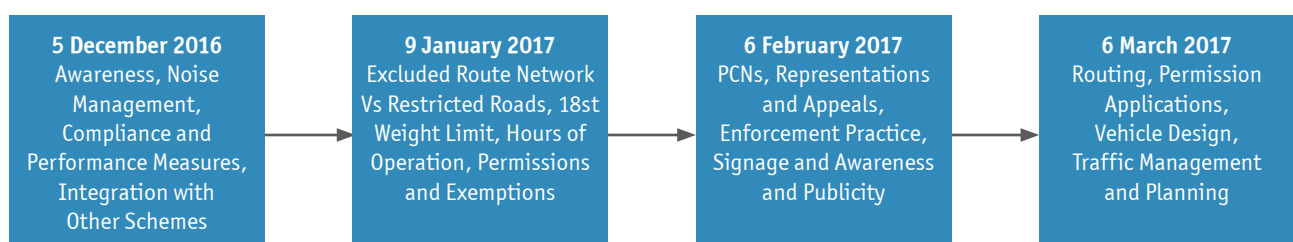
### **4. Technology**

- Routing
- Permissions
- Vehicle design
- Traffic management and planning

In each of these key areas discussions outlined:

- What are the issues?
- What evidence and data is available so that the issues can be understood with more clarity?
- What are the possible solutions or actions we can consider taking?

Figure 8: shows the dates of the meetings and the items covered.



The results of these discussions with the Working Group can be seen on page 23.

# Operator engagement

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One of the initial recommendations put forward by freight and industry representatives at the Working Group meetings was that more widespread, considered engagement was required with the industry as a whole. There was a general feeling that operators may not be fully informed and engaged with the review unless they were given a platform to share their views.

Members of the Working Group and Steering Group agreed that this would also be beneficial in providing quantitative and qualitative data at a sufficient level to acquire a better understanding of the issues faced by the industry and their freight movements in London in relation to the scheme.

London Councils engaged with operators in two ways: By way of an online survey asking specific questions about the scheme, with the results of the questionnaire steering an Operators Workshop dedicated to the LLCS review. Subsequently, London Councils also presented details of the review and preliminary findings at the TfL Freight Forum on 31 March 2017.

## Operator Survey

In February 2017, London Councils released an online survey for the freight industry. London Councils contacted in excess of 3,500 hauliers from our permissions database. Member organisations of the Working Group also contacted their members to participate by completing the survey, which assisted with reaching other operators that may not regularly come into London.

The survey included the completion of some general data gathering regarding travel behaviour, as well as questions on the understanding of the scheme and some of the issues that they believe have impacted their business.

The operator survey questions can be found in Appendix 5

The results of the survey are analysed within the relevant section of this report and can be found on page,

## Operator Workshop Day

On 9 March 2017, London Councils held an operator workshop day at the Kia Oval in London, designed to maximise engagement with the freight industry. The well attended event included over 70 representatives from such sectors as: retail, construction, distribution logistics and manufacturing. The workshop was chaired by the Freight Transport Association's Head of Policy for London, Natalie Chapman supported by a panel consisting of:

- Spencer Palmer, Director of Transport, London Councils
- Duncan Buchanan, Deputy Policy Director, Road Haulage Association
- Gloria Elliott, Chief Executive, Noise Abatement Society
- Denise Beedell, Development Manager – Greater London, Federation of Small Businesses

A number of presentations from key stakeholders were featured throughout the day on the following aspects:

- **London Councils:** Spencer Palmer, Director of Transport and Mobility - Background to the LLCS, purpose of the review and workshop, and operator survey results summary

- **Noise Abatement Society:** Lisa Lavia, Managing Director - The impact of transient noise levels in London
- **Ashfords:** Robert Belton, Director - Retiming deliveries in London

The main focus of the day was broken down into three interactive break-out sessions seeking views from the industry on the following areas of the LLCS:

- **Session 1:** LLCS weight limit and the hours of control.
- **Session 2:** The nature of the ERN and LLCS signage
- **Session 3:** The administration process and enforcement of the LLCS

The aim of these sessions was to encourage small group discussions and capture feedback on the issues and impact of the LLCS, putting forward suggestions on what amendments could be made to the scheme to mitigate these issues in the future.

Following the group discussions, to promote a healthy debate, the views from each group were presented to the panel.

Feedback from operators indicated that they welcomed the engagement opportunity and felt it was both useful and informative. The information gathered from the workshop endorsed the results of the operator's survey and provided first-hand experience of the effects of the LLCS on the freight industry. Details captured from the day can be seen on page 31.



# Borough engagement

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Following the comprehensive engagement with the freight industry, London Councils undertook further engagement with boroughs. The current LLCS has significant impacts for boroughs with respect to night time and weekend freight movements, deliveries and how they manage their own networks. Boroughs have a responsibility to their residents in terms of safety and environmental impacts such as noise and air quality. They will often be the first point of contact to receive complaints regarding any undue noise from HGVs during the controlled hours of the scheme and therefore, the responsibility lies with them to manage this accordingly.

London Councils administers the LLCS on behalf of the boroughs, so any review must include significant representation from them. Any proposed changes to the scheme will have an impact on residents and borough highways. Ultimately, through London Councils TEC, boroughs will determine whether to accept any recommendations following this review.

Thus far, London Councils has engaged with boroughs in two ways: In May 2017 an online survey was released asking specific questions about the scheme and the effect it has on residents. We also ran a London Freight Borough Officer Liaison Group (BOLG) workshop.

## Borough Survey

In May 2017, London Councils launched an online borough survey asking a number of questions relating to the current LLCS. The survey was sent to all borough stakeholder departments that would have an interest in the LLCS, including Parking Managers, Highways, Environmental and Planning departments, as well as those specifically dealing with freight. London Councils requested that all of these departments liaised with each other to provide a single set of responses from each borough to avoid any potential conflicting information.

The questions asked can be seen in Appendix (6)

The results of the survey are analysed within the relevant section of this report on page,

## London Freight Borough Officer Liaison Group (BOLG) workshop

On 12 May 2017, London Councils held a borough workshop to look at the borough and residents aspects of the LLCS review and to seek further feedback from boroughs in the two following areas:

- The effectiveness of the scheme
- Options for change and improvement

The session was attended by 17 boroughs and proved a useful exercise in capturing the views and issues boroughs face with respect to freight noise.

London Councils presented the reasons for undertaking a review of the scheme, the operator's survey results and a preliminary set of review recommendations based on the engagement so far.

Full details of the results of this workshop engagement can be seen on page 47.

## Future engagement with residents

London Councils is aware that there will need to be significant engagement with residents and is committed to future consultations. London Councils took the decision not to undertake further resident engagement at this time, as it is believed it would be more beneficial to present a full set of recommendations once discussions with the freight industry and boroughs had taken place. This is considered the preferred approach, rather than asking residents to comment on and understand the subject without relative context.

Resident's knowledge of the LLCS may be limited, as they often only come into contact with the scheme and its existence when there are underlying issues with respect to freight movement in their local area. That, coupled with the relative difficulty in engaging with such a widespread section of people, also contributed to the decision not to do this at this time.

There was resident group representation on the Working Group and the feedback provided has fed into the documented outcomes of these meetings.

Following further collaboration with boroughs, London Councils will seek future engagement via borough resident's networks and websites. This is likely to include attending local meetings and providing further information in the local media.

# Results of the engagement with key stakeholders

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The following section will outline comments and possible solutions following stakeholder engagement.

## a) Working Group meetings

The Working Group meetings focussed on the four key areas previously highlighted. These discussions fed into the final set of recommendations described later in this report and also focussed the engagement with vehicle operators and boroughs for both the surveys and individual workshops. A summary of these discussions are outlined below.

### Meeting 1: Effectiveness of the Scheme

#### Awareness

The Working Group highlighted that the lack of knowledge regarding the branding, identity and ownership of the scheme needs to be addressed with consideration given to rebranding and relaunching the scheme.

It was identified that operators and businesses that may be new to London or have limited interaction with the scheme could be better informed. The purpose of the scheme should be better promoted to advise residents and businesses of the impacts of noise pollution, congestion and air quality. It is considered that significant improvements can be made with a communications strategy by developing the LLCS website information, utilising borough and freight websites by adding URL links, dispatching public surveys and working in partnership with TfL to ensure collaborative working in line with their retiming deliveries programme.

#### Noise management

The issue of noise is not restricted to commercial vehicles; therefore more could be done to create a 'noise standard' with the intent of capturing unsociable noise levels from all vehicles. Aspects such as driver awareness and training, which already take place under the Fleet Operator Recognition Scheme (FORS) could be expanded to include more details on the LLCS. The effects of traffic calming, poorly maintained road surfaces and infrastructure, alongside badly maintained vehicles and inappropriate vehicle design should not be underestimated in creating undesirable noise pollution. Further data surveys and research into noise pollution should take place, as well as the provision of improved advice and guidance.

#### Compliance performance measures

The lack of compliance data in relation to night time and weekend freight movement needs to be addressed. What effects does an increase in mileage and time have on the freight industry and conversely, what are the effects of non-compliance on residents? What proportion of vehicles 'short cut' through London as a matter of convenience and what proportion of vehicles contravene the regulations for no reason? Improved research and the monitoring of data is key to create a better understanding of vehicle movement and could help tailor enforcement where it is needed.

#### Integration with other schemes and initiatives

How does the existing scheme integrate with the Low Emissions Zone (LEZ), Safer Lorry Scheme (SLS), FORS and Construction Logistics and Community Safety (CLOCS)? Is there scope to combine such schemes more effectively in the future? The relationship with retiming deliveries (which may be affected by the scheme) needs to be understood better, as does the interaction with existing parking, construction and planning regulations. The scheme will need to interact further with consolidation centres and changing business and transport requirements.

## **Meeting 2: Restrictions**

### **ERN vs Restricted Roads**

The terminology of 'ERN' and 'restricted roads' could be improved to encourage a better understanding, as currently both are seen as negative descriptions and open to confusion. This could be achieved by rebranding and relaunching the scheme. There have only been minor changes to the ERN since 1985, therefore it needs to be assessed in its entirety to reflect the needs of a dynamic 24 hour city.

Information relating to the conditions of the scheme and the associated TMO could be better publicised. Visibility of the restriction map could be improved, with the possible inclusion of interactive mapping as a route planning tool with live travel information.

Signs advising of the scheme need to be assessed and improved to provide more reassurance to drivers. Further information is needed regarding the impacts of the current restrictions (such as the impact of longer journey time for operators and drivers taking compliant routes), as well as better communications with boroughs and operators on kerbside access for loading, including the rules regarding 'multi-drop' deliveries on restricted roads.

### **18 tonne weight limit**

Research into the current 18T weight limit needs to be undertaken to see if this measure of control is fit for purpose and whether it should be increased, decreased or remain the same. Is the three axle determination of weight acceptable when newer vehicle models are said to be quieter than vehicles currently not subject to the scheme? It is suggested that the setting of a noise standard for vehicles encompassing all aspects (airborne noise, transient noise, on board equipment) should be examined as a possible future enforcement measure. The feasibility of offering exemptions to the quietest vehicles should be explored to form part of the permission conditions.

### **Hours of operation**

The current hours of operation, especially at weekends, are possibly outdated and would benefit from a review, to lessen the impact at peak morning times and to facilitate evening deliveries in a modern city, the start and finishing hours of control could be relaxed.

### **Permissions**

Operators apply for permission online; however there is room for this service to be improved and made more efficient. There is an opinion that operators are penalised too harshly for failing to add a vehicle to the database, so a 'standard' policy could be introduced where a warning is given for a first 'offence'. Improvements to operator engagement and an improved website should help facilitate this. The administrative burden surrounding the EF119 process should be reviewed, as should the scope for special routing and exemptions for vehicles undertaking emergency works.

## **Meeting 3: Enforcement**

### **Enforcement practice and methods**

With the limited coverage provided by five dedicated on-street EO's, other options for enforcement could be considered, such as exploring the use of camera technology.

### **PCNs, Representations and Appeals**

The bureaucratic nature of PCN processing and response times to incoming correspondence relating to the EF119 process could be improved. Enhancements to routing guidance and mapping tools would speed up the process and make it more efficient to administer the scheme for London Councils and affected operators. An online evidence submission portal would make the engagement process much more efficient and effective.

## **Signs**

A review of the signs needs to take place. It was noted that some may not be located where they should be, others not in place at all and several existing signs are depicting the previous weight restriction of 16.5T. It was suggested that the signs be branded to visually identify the LLCS and made clearer, to inform drivers that they are entering a restricted road. The signs are not directional and are often located where it is impossible to make a detour once observed. Could investigations take place as to whether the LLCS could be enforced without the current volume of signs? Should there be directional warning signs? Should the signs be repositioned at different points of entry (e.g. borough or scheme boundaries)?

## **Awareness**

Please refer to the section on awareness from Meeting 1.

## **Meeting 4: Technology**

### **Routing**

There is a lack of routing options available to operators and often routes have to be manually planned, which is time consuming and costly. London Councils should consider providing a dedicated electronic routing tool using an 'open data' platform to encourage providers of satellite navigation systems the opportunity to develop LLCS compliant products. Any routing tool should be coherent and fairly priced, if charges were to be applied.

### **Permissions application**

The current permissions application process needs to be updated as previously outlined, to make it more efficient and easier to use. The current set of permission conditions and TMO need to be revised to reflect the current situation with respect to enforcement and possible future exemptions.

### **Vehicle design**

The LLCS should take into consideration the changes in vehicle design with respect to air quality and noise. These should be clearly defined in the terms and conditions of the scheme. Currently there is no set of noise standards for vehicle movement which need to be developed if we are to see major changes in how the scheme operates.

Electric Freight Vehicles (EFVs) are considered to be quieter and should be a possible exemption from the scheme. As yet there are limitations on such vehicles to cater for loads of over 18T but technology is improving all the time. Boroughs and manufacturers need to engage in the future to improve vehicle models and the provision of charging infrastructure.

### **Traffic management**

How does the LLCS sit with other traffic management schemes? Investigations need to take place as to the routing impact of traffic lights, traffic calming and the current standard of road surfaces.

## **b) Operator Survey**

The survey was sent to over 3,500 freight operators using existing contacts from London Councils permissions database, as well as contacts held by TfL, FTA, RHA and FSB to maximise the publicity.

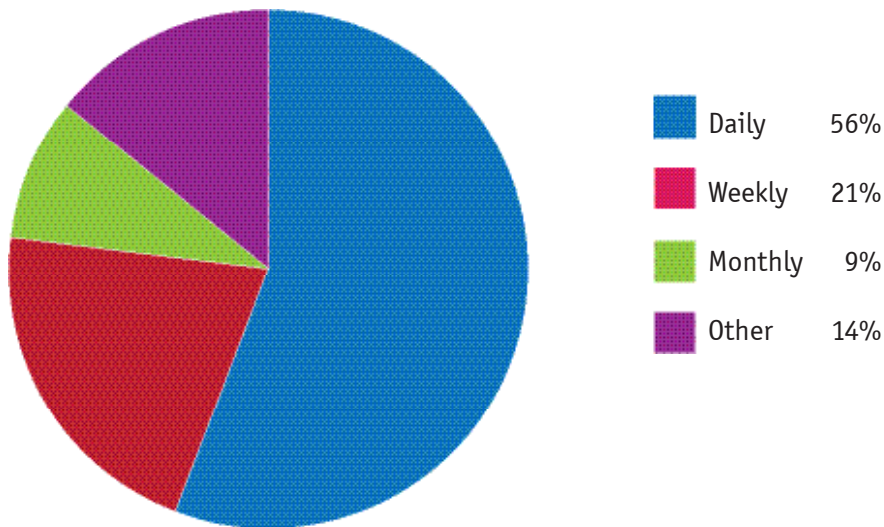
London Councils received **635** responses to the online operator survey. The breakdown of responses is as follows:

### **Q1. How many vehicles over 18T maximum gross weight (MGW) do you have?**

Responses from operators ranged from those that have one vehicle to those that have a significant and ever changing fleet of over 900 vehicles.

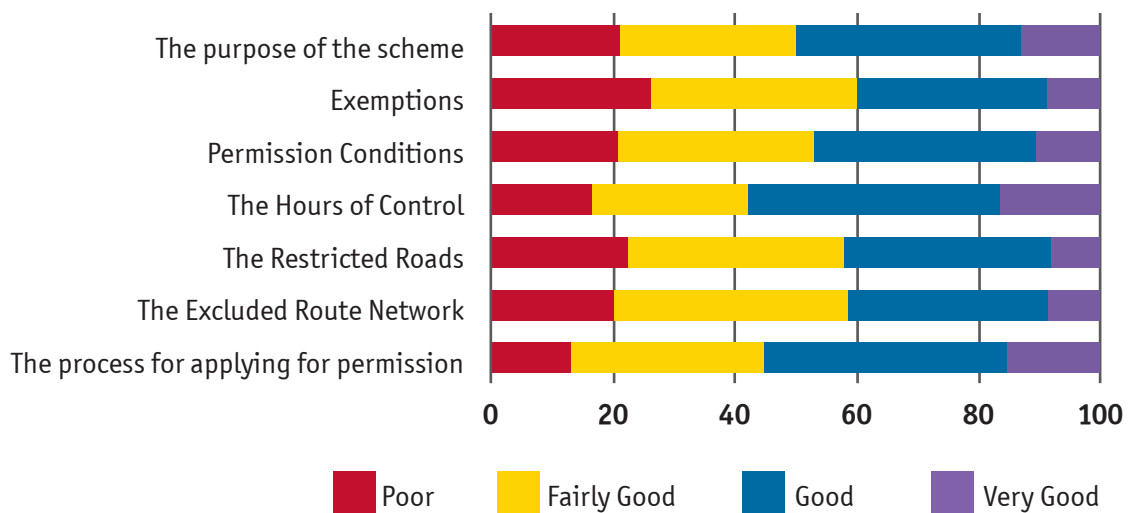


**Q2. Which of the following best describes how frequently you carry out deliveries/collections with vehicles over 18T (MGW) in London at any time of the day or night?**



This chart indicates that the majority of vehicle operators are entering London and potentially coming into contact with the LLCS on a daily basis. The vast majority come into London on a regular basis and would therefore need to plan their delivery and routing schedules in advance and in accordance with the requirements of the scheme.

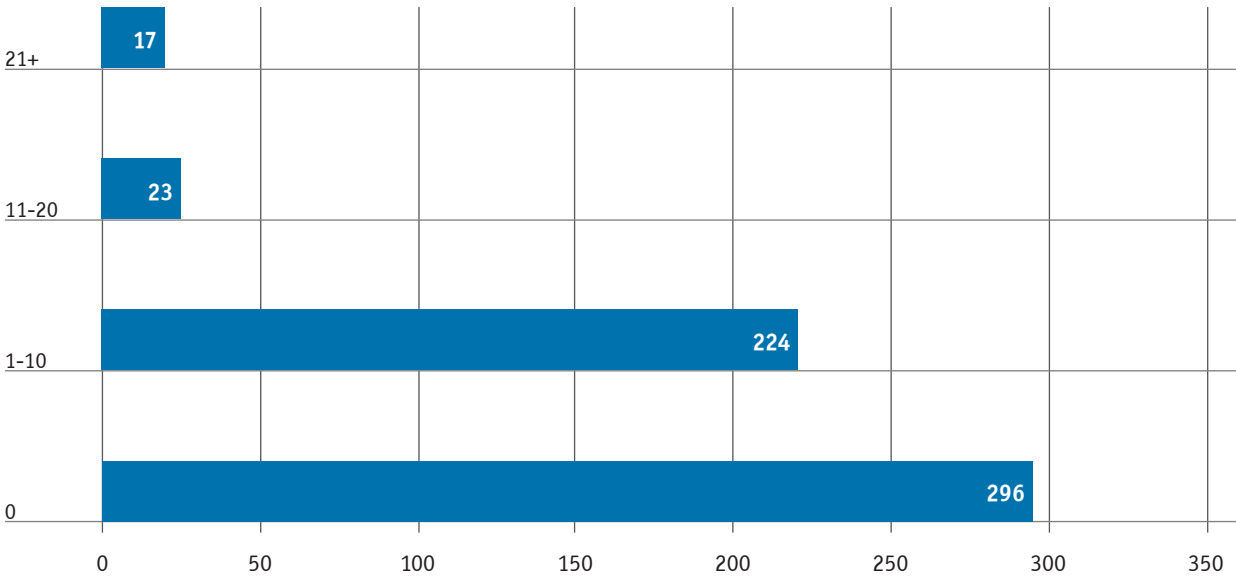
**Q3. How would you rate your understanding of the following aspects of the London Lorry Control**



	Poor	Fairly Good	Good	Very Good
The process for applying for Permission	13.32	31.62	39.61	15.45
The Excluded Route Network	20.43	35.13	35.66	8.78
The Restricted Roads	22.68	35.36	33.75	8.21
The Hours of Control	16.58	25.67	41.35	16.4
Permission Conditions	20.79	32.26	36.2	10.75
Exemptions	26.26	33.81	31.12	8.81
The purpose of the Scheme	21.43	28.57	36.96	13.04

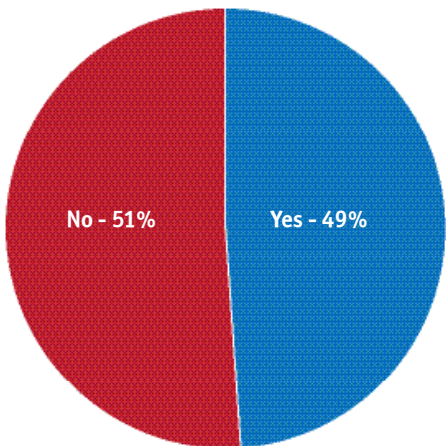
The overall response to this question indicates that to a large degree, the understanding of the LLCS by vehicle operators is good. However on average, in all aspects questioned, 20% of respondents indicated that their knowledge is poor. This raises concerns with respect to compliance. To address this further, a communications strategy needs to be put in place with respect to publicising the scheme, providing clearer guidelines on how and why the scheme operates and what the conditions of travel are.

**Q4. How many London Lorry Control Penalty Charge Notices (PCNs) have you/your business received during the last 12 months?**



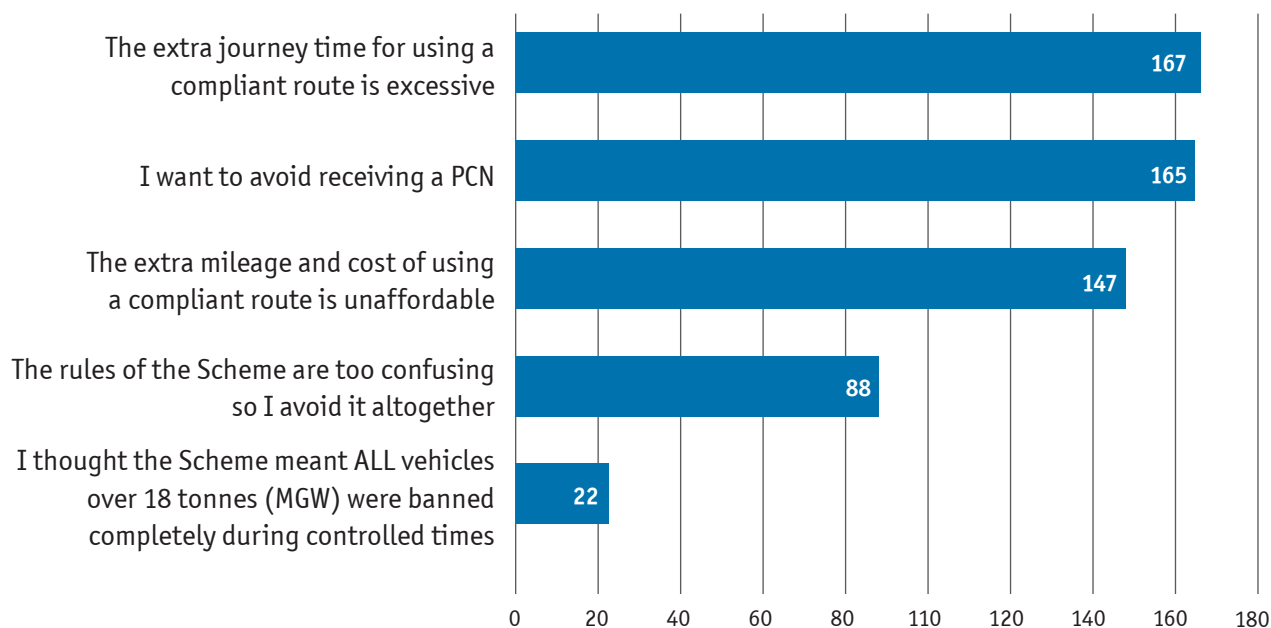
It is encouraging that the majority of operators have not received any PCNs in the 12 month period leading up to the survey. This shows that there is a significant understanding of the scheme and an indication of reasonable compliance levels. Consideration needs to be given to the small but significant number of operators receiving multiple PCNs. With these, it is possible that either the rules and regulations of the scheme have not been understood, or potentially the threat of receiving a fine does not outweigh the commercial benefits of non-compliance. In any event, London Councils need to increase publicity of the scheme to reinforce understanding of the terms and conditions and engage directly with operators that are receiving multiple PCNs to establish how improvements can be made in the future.

**Q5. Has the scheme ever discouraged you from carrying out deliveries/collections during the**



Responses to question 5 indicated that a small majority of vehicle operators had not been discouraged from delivering during the hours of the scheme. However, a significant minority of 49% indicated that they were discouraged and therefore have issues about the operation of the scheme and the ability to fulfil their obligations during the hours of control. London Councils welcome an industry step-change in the increase of out of hour's deliveries and the possible benefits they can have in terms of decreased congestion during peak hours and reduced conflict with other vulnerable road users.

**Q6. In what ways has the scheme discouraged you? (Tick all that apply)**



A total of 262 respondents answered this question, with 373 choosing not to. This may be encouraging in that most respondents are not discouraged. Nevertheless the 262 that did answer did often tick a multiple number of reasons.

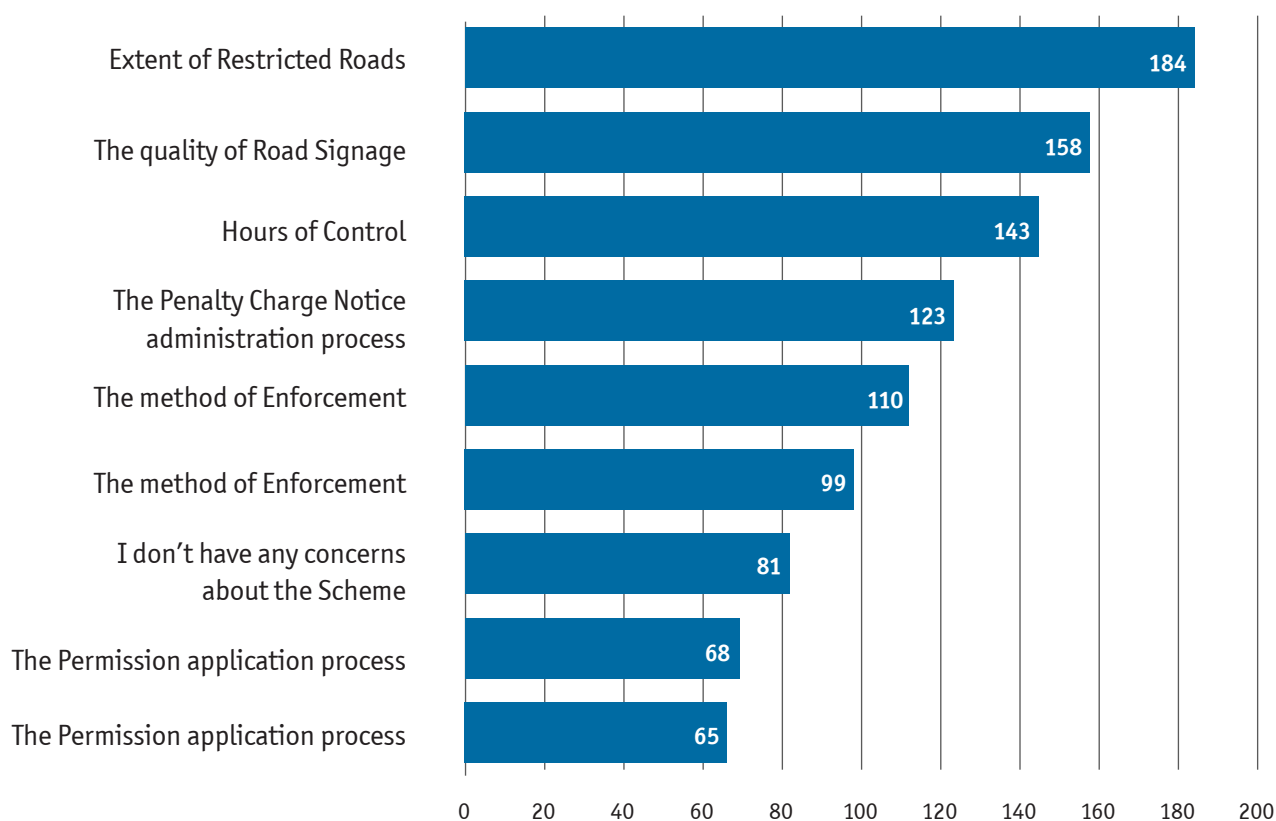
Over 160 respondents indicated that they believe the extra journey time in using a compliant route is excessive. In some circumstances, maximising the use of the ERN during the hours of the scheme adds additional time onto the journey in comparison to the routes undertaken when the scheme is not in operation. Whether this prevents operators undertaking deliveries using compliant routes during the controlled hours of the scheme requires further investigation. Journeys carried out at night time when the road network is less busy should be quicker than travelling shorter distances during the day when roads are more congested.

The operators responses show that the schemes restrictions increase their journey times, adding mileage and cost to the businesses. London Councils is flexible in their approach when reviewing operator journeys and endeavours to minimise 'excessive' distances as much as possible. A 'common sense' approach to routing, depending upon the origin and destination of any vehicle movement, is always taken. Whilst it is not in the interest of London to reduce or increase journey distances drastically, there are rules to the scheme and these must be followed.

Over 160 respondents also indicated that they were discouraged from making journeys during the operational hours of the scheme to avoid receiving a PCN. This could be taken to indicate that the current PCN levels are set at the correct level to discourage non-compliance. Improved communications and information on the current LLCS could alleviate some of the fears and possible myths that operators have and would help assist them when planning their delivery schedules. Any future proposals as to the nature of the scheme moving forward should look to reduce discouragement.

Over 80 respondents indicated that the scheme is too confusing and therefore is avoided altogether, whilst just over 20 indicated that they thought the scheme was a total ‘ban’ on vehicles over 18T. It is clear from these responses that London Councils can do more to educate and inform operators of the conditions and rules of the scheme.

**Q7. Which aspect(s) of the scheme are of most concern to you/your organisation?  
(Tick all that apply)**



From the 635 responses, 374 answered this question. Those that did respond indicated that they had concerns in a number of areas providing London Councils with useful information.

The main concern was the extent of the restricted roads and the current balance between this and the ERN. The general feeling is that the ERN should be expanded, perhaps covering the full extent of major arterial roads in London. London Councils is aware that the ERN needs to be reviewed to reflect some network changes since the last revision. Such a review would need to involve full public consultation.

The second biggest concern was the quality of the on-street signs. It was felt that some were missing, in a poor condition, not accurate or in the wrong locations. It was suggested that more advance warning signs should be provided, as often it is too late for a driver to amend their route upon observing a sign. A full review of existing signing would help establish where improvements might be needed.

Over 140 respondents cited the hours of control as an issue, (the current times when the scheme is in force has been highlighted earlier in this report). The freight industry feels that the timings are too restrictive and should be amended to reflect the current nature of working patterns in our modern 24 hour city.

The PCN administration process was also a large concern for operators. This is largely down to the EF119 process where operators with a permission are asked to provide evidence to support their use of the restricted roads. Many operators believe this is too time consuming and often unnecessary, especially if they are proven to be repeatedly on a compliant route. It should be noted that the statutory process cannot be followed unless London Councils are able to determine whether a contravention has actually occurred, this is borne out by the evidence submitted by the registered haulier after the vehicle has been observed. Streamlining and updating of the back office administration process could make it more efficient for all users.

Over 60 respondents cited the permission administration process as an issue and suggests the need for enhancements in this area also.

Over 100 operators indicated that the method of enforcement is of concern to them. The issue of on-street EOs, using contemporaneous note books and lack of CCTV or photographic evidence confirming a contravention has been raised on a number of occasions in operator representations. The use of CCTV and ANPR enforcement may bring more consistency and accuracy to enforcement process.

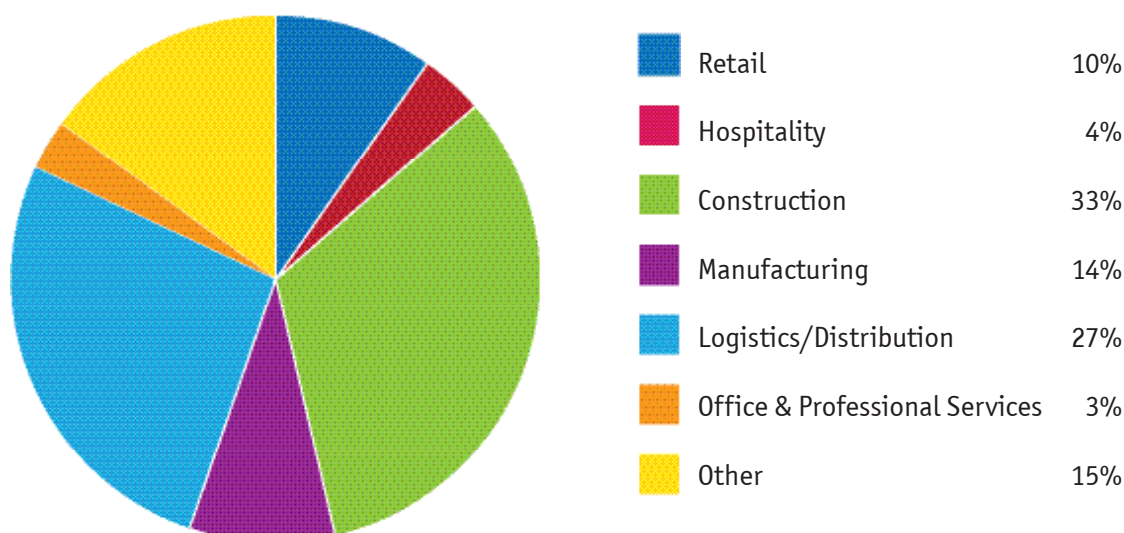
The over 18T (MGW) weight restriction was also highlighted as a concern. The weight limit was originally applied to easily identify vehicles with three axles or more within the overweight category. However, many operators do not think that this 'cut off' mark accurately reflects the real position with regards to vehicle noise. Is there a better way to determine vehicle noise that could be used to capture noisy vehicles and not just noisy HGVs?

Just over 60 operators indicated that the three year permission for a vehicle was an issue.

Prior to 2010, operators were obliged to re-register their vehicles once a year and a physical permit would be issued to attach to the windscreen of each vehicle. London Councils introduced a three year virtual permission to reduce administration and costs. There is scope to review this and coupled with any improvements to the permission administration process, this may relieve some of the administrative burden for both London Councils and vehicle operators.

Finally, just over 80 respondents indicated that they did not have any concerns over the scheme. This may mean that they do not undertake deliveries during the hours of control so do not come into contact with the LLCS or that the LLCS does not restrict the journeys that they have to make.

**Q8. Which best describes the nature of the organisations or businesses that you deliver to/collect from?**





The chart above indicates that responses were received from a broad cross section of freight operators indicating that the communications regarding both the review and survey reached the intended audience and the level of response was positive.

### c) Operator Workshop Day

Discussions from the operator workshop day focussed on three breakout sessions. This section of the report will focus on the discussions in each of these sessions in turn. The main focus of the sessions was to seek views from the industry on the following areas of the LLCS:

#### Session 1: LLCS weight limit and hours of control

Two aspects were identified in the Working Group discussions as of importance and concern to vehicle operators:

- The current LLCS weight limit restriction of over 18T – whether this is fit for purpose or should be amended?
- The current hours of control – are these too restrictive, should they be increased or decreased?

Information gathered in session 1 is outlined below.

Issues	Evidence	Possible solution/action
Should the scheme be enforced on the basis of vehicle weight?	The restriction often causes split loads i.e. using two or more vehicles rather than one	18T is too low and should be increased
The scheme should be enforced on noise levels	Not all vehicles create the same noise regardless of their weight	Type of vehicle should be taken into account not just its weight
The scheme is lorry focussed, why not other vehicles that are just as noisy	Lorries under 18T and cars and motorcycles are equally as noisy.	Controls on the basis of noise should take into account all vehicle types
No account is taken with respect to exceptional circumstances during planned events	N/A	Lift restricted areas during times
What is the noise difference between a 16T/18T and 32T/44T	Modern vehicles are quieter than they were 30 years ago	Set a noise level standard and use that for enforcement
Restrictions cause diversions into housing/built-up areas	Restricting the use of major roads that are not ERN shifts vehicle movement onto smaller roads	Increasing the weight limit and expanding the ERN would reduce the use of smaller roads
18T vs. 44T - no difference in noise	Newer vehicles are far quieter than older vehicles	N/A
The weight limit is too low	More drops on larger vehicles = less smaller vehicles	Increase the weight limit to 44T
The weight limit is too low	N/A	Increase the weight limit to 32T

Abnormal loads - CoL Police restrictions (7am - 7pm). Not allowed to travel in the City after 7am but LLCS restricts movement in before 7am.	CoL Police restrictions	Latest 6am curfew if required to circumnavigate A406/A41 (+20-30 miles) instead of 3-4 miles on A13
Euro 6 has increased vehicle size to 26T	N/A	Fuel type should have exemptions
Weight limits need to be reviewed	Standard noise has reduced as per European requirements	Either weight needs to increase or enforcement undertaken on the basis of noise
Buses are as noisy as trucks, if not more	N/A	Same rules should apply to all types of vehicles
Why are some routes restricted and not others?	N/A	
No noise level testing in place	Lack of standards and testing in London for noise	Route soundscape testing (area based)
City of London - different loads/restrictions	N/A	Take other schemes into account
2019 - ULEZ will be introduced	N/A	Take ULEZ into account

Evidence gathered in this session clearly indicates that the freight operators are concerned that the scheme is both enforced by a weight limit and that it is set too low (18T). Many attendees suggested that the weight should be increased to either 32T or 44T to reflect the servicing and delivery requirements of a city such as London. One of the main factors for this is that modern vehicles over 18T can be quieter than those under 18T which are not subject to the scheme. Therefore, many believe the design of the vehicle and the load being carried should be taken into account when enforcing the LLCS and not simply the weight.

Many operators also indicated that the scheme encourages them to use smaller two axle vehicles which are under 18T rather than larger vehicles to avoid contravening the scheme. This can result in increased operating costs and more vehicle journeys of a night time, which could have negative environmental impacts on both noise and air pollution.

A number of attendees felt that the controls should operate on the basis of vehicle noise rather than weight limits to ensure that all vehicles that are having an environmental impact (including buses, cars and motorcycles) are also subject to the scheme and not just HGVs. A noise standard should be developed and explored as part of an enforcement solution to facilitate this.

Respondents also felt that other schemes such as LEZ and the SLS should be linked to the LLCS to provide a single set of rules for London. This could be operated centrally and would improve engagement with the sector, reduce costs and assist with a better understanding of all of the restrictions.

## Hours of Control

Issues	Evidence	Possible solution/action
The worst time to deliver in London is between 7am and 9pm	Congestion is greater and conflict with other road users is heightened during these hours.	The scheme should finish at 6am and start at 10pm seven days a week.
Change the hours of control	Less Light Goods Vehicle (LGV) congestion	The scheme should operate 11pm-6am including Saturdays
A review of the hours needs to take place	The controls are too restrictive for freight operation in a 24 hour city	11pm -6am seven days a week.
Exemptions are needed for out of hours work	Grab and Tipper lorries are generally over 18T and need to carry the quantity of materials needed efficiently	There should be greater use of exemptions and closer working with particular sectors
Increased pressure on drivers during the hours of the scheme	N/A	Time slots should be allocated for individual business needs
Some collections need to be undertaken out of hours e.g. waste collection	N/A	Amend the requirements depending on the type of industry
The freight industry needs to meet the demands of a 24 hour city.	There are increasing freight movements to supply this demand and meet the expectations of Londoners	The LLCS needs to be updated to facilitate such deliveries and meet expectations
Sunday deliveries should be allowed	In many sectors the shops and businesses are open on a Sunday and therefore need to be serviced	There should be a relaxation of Sunday controls
Legal requirements regarding tachograph breaks	N/A	Remove tachograph rules

In general, operators felt that the current hours of control were too restrictive and should be reduced. The exact detail of what any revised hours should be varied. However, there was consistency in the opinion that the controls should start later in the evening and end earlier in the morning. There were also a significant number of suggestions to relax the controls during the weekend, potentially to match the controls during the week.

Many operators highlighted that there is an expectation from residents and businesses to receive their goods and services when they want them. Some believe the restrictions of the LLCS mean that it is increasingly difficult for the industry to meet these demands.

Operators also emphasised that some of the business requirements specific to their sector (such as waste management and construction) mean that a 'one size fits all' scheme impacts their ability to carry out their work. It was also felt that the LLCS could engage more with other sectors and more exemptions should be included within the TMO for different circumstances (e.g. those dealing with emergencies).

## Session 2: The nature of the ERN and LLCS signage

The second session focussed on round table discussions identified by the Working Group.

- The ERN and restricted roads – whether they are currently fit for purpose or whether amendments should be made and how could the administration process be improved to increase compliance?
- Signage – are signs in the right place, are they clear and well maintained and are they required?

Information gathered in session 2 is outlined below:

### The Current ERN

Issues	Evidence	Possible solution/action
Restricted roads mean that operators are driving more miles, working longer hours and causing increased emissions	Certain routes can divert a driver significant distances (e.g. Bow to Kings Cross)	The ERN should be reviewed to reduce instances of significant addition to journey times and miles. Perhaps with a through London route
A review of restricted roads is required as and when the profile of areas change	Some areas have changed significantly so the need for the restriction is now unnecessary	Full consultation and review of the network
No information or updates on temporary restrictions such as road closures and diversions	N/A	Updates via email or on a live map should be available
Access to information on restricted roads needs to be automatic in real time	N/A	Produce an app/map with LLCS restrictions that can be linked to satellite navigation systems
All major 'A' roads and previous 'trunk roads' are not necessarily part of the ERN	N/A	This should be reviewed so these major roads do form part of the ERN
There does not seem to be a general rule for what is the ERN and what is restricted	It is unclear as to what the rules and reasons are with respect to the current network	More information and engagement is necessary
No allowances for roadworks or broken down vehicles	When enforcing, these aspects are often not taken into account	A common sense approach should be used here when enforcing
Lack of communication on how to get an exemption	Information on website is not clear as to how this subject may be approached	Better communication avenues including an updated website
Creates 'bottlenecks' on ERN	Vehicles are often all using the same routes creating noise and congestion	The availability of more 'A routes' could alleviate this issue
There is a lack of information as to why a road is restricted	N/A	More information and engagement is necessary

A significant number of operators felt that despite a review of the network in 2010, the ERN and restricted road network needed to be revised to bring it up to date with the current road usage requirements. Many indicated that whilst the ERN maps a significant number of the major arterial routes in and out of London, it does not include all of them and possibly should. This could assist with better routing, reduce driver hours, minimise costs and improve the balance of freight journeys by routing away from bottleneck junctions and roads.

Operators identified the need for real-time routing information to allow detailed planning before a journey and to provide drivers with a tool they can confidently use during the journey. This would benefit drivers in the event of temporary restrictions, such as diversions and road closures or when there are road works which could have significant impacts on their ability to use the ERN. The creation of an 'app' or an interactive mapping tool that feeds into a satellite navigation system, would relieve some of the pressure for drivers, having a positive impact and influence on compliance and behaviour change.

A number of operators noted that the scheme increased their costs, mileage and journey times when attempting to comply with the rules. More consideration could be given when routing vehicles to reduce these impacts and should be reflected by any changes made to the ERN. Several operators believe this could occur without a negative impact on residents.

Some operators suggested that there is a lack of cohesive information on the criteria for restricted roads. There should be more information widely available in the public domain. Guidelines for rules and regulations, exemptions and special routing arrangements need to be improved on London Councils' website to assist operators with general planning and any exceptional circumstances.

## LLCS Signs

Issues	Evidence	Possible solution/action
More prominent signage is required as the current signs can be confusing when driving	Signs can often be lost in other street clutter as they look like any other sign	Signs should have a unique colour code or perhaps contain recognisable branding to make them more noticeable.
Forward planning for signs with a countdown to the restricted zone and advanced warning signs	Drivers have often entered the restricted area by the time they observe the sign	More advanced warning signs and a new system of signing like the LEZ or SLS.
Promotion of the scheme is needed to raise awareness	Lack of knowledge of the scheme	Branding of scheme and revised communication program to help with understanding and improving compliance
The signs need to be simpler as they contain too much information	All signs have weight limit and hours displayed	Assess whether the scheme could be signed differently
Signs are often missing in the most important areas	Many roads have missing signs or signs that have been poorly maintained	A full review of signs to ensure that they are clear and in the right place at all key locations
Updates on new signs in areas are not given in advance	N/A	Communication in advance of new restrictions

Signs create street clutter	Signs are often on top of other signs or surrounded by signs advising of other restrictions	Could the scheme be enforced without the use of signs?
Size of the signs and poor lighting	Many signs are small and have not had lighting maintenance	Review of signs and maintenance plan
Communication needs to be more positive i.e. there should be a focus on where you can go rather than where you cannot	N/A	Assess the feasibility of amending the signs to take this into account
Information on alternative routes is needed.	No information given	Electronic updates and mapping tools could assist with this
Lack of signs around bridges and tunnels for height restrictions	Tulse Hill A205 is one such area	Engage with operators and highways authorities to ensure that all required signs are in situ.
International drivers are unaware of the scheme	N/A	Signs in multiple languages or details of the scheme made available to foreign drivers

It was clear from this session on signs that many felt the current provision was not sufficient. They indicated that drivers often use them when undertaking their journeys and that some are inaccurate or out of date.

A number of operators suggested that the signs need to be more prominent and carry specific LLCS branding, making them easier to detect, whilst promoting awareness of the scheme. Some operators requested more use of advanced warning signs, as often a driver will only see a sign once they have entered the restricted area, by which time it may be too late to avoid the restricted road.

It was felt that London Councils should undertake a full and comprehensive review of the extent of the current signs to establish the condition and appropriateness of each sign, whether the sign needs to be repaired, replaced or repositioned. Some operators felt the signs were not necessary in some locations and simply added to the street clutter. Consideration should be given to the volume of signs advising of different restrictions (such as parking controlled hour restriction) and signs located in the same vicinity, almost creating signage 'overload'. The requirement for drivers to read and understand all of the differing signs whilst driving can be difficult and distracting. Any reduction of street clutter would be welcomed.

Some operators indicated that if there was a more appropriate way to advise of the LLCS, perhaps using mapping and routing technology, then the requirement for on-street signs could diminish as the primary source of notification. This option would need to be explored in more detail.

### Session 3: The administration process and enforcement of the LLCS

- The third session focussed on round table discussions identified by the Working Group. The administration process and how this affects compliance – Is this too cumbersome and bureaucratic for operators, could the use of technology improve compliance?
- Enforcement of the LLCS – Is the current enforcement practice adequate in providing consistent and effective enforcement of the scheme? Would the use of technology help in this process and improve compliance? Is the back office process effective in communicating the rules of the scheme and could this be made more efficient?

Information gathered in session 3 is outlined below:

## Administration of the LLCS

Issues	Evidence	Possible solution/action
Inconsistency with correspondence on PCNs and EF119s (Enquiry Letters)	Sometimes the evidence is deemed acceptable whilst on other occasions it is not	More consistency in approach and improved public awareness of guidelines
The website is not user friendly and easy to navigate	Difficult to find the information required and liaise with the correct person	Improved website with more details of the scheme
There is no approved mapping and routing tool provided by London Councils	The current routing tool provided by 'PIE Mapping' is thought to be expensive and not fully linked to London Councils processes	Development of an online mapping and routing tool that is managed and controlled by London Councils
There are delays in receiving responses to queries and investigations	Some responses arrive after important deadlines meaning that the opportunity to pay the reduced rate has elapsed	More use of email where possible and reduce current minor backlogs
There are no live updates on road closures	No information on diversions and temporary restrictions	Daily email to operators and enhanced links with other networks to provide more detailed information
Lack of marketing of the scheme for operators outside of London	Many operators outside of London are unaware of the scheme	Improve communications and make better use of existing networks
Lack of detail on PCN rejection letters	N/A	Clearer explanations on what went wrong and how this should be rectified
Appeals process is difficult to understand	N/A	Improved information on the appeals process and electronic submissions
Renewal of permissions every three years is unnecessary	The move to the three year permission from an annual permission was welcomed but could this not be longer?	Increase permission life to five years to reduce administrative burden
The permissions process should be simplified and operators should not be penalised for making simple mistakes	N/A	Review the current system and launch enhancements to make the process easier.



The administration process is still largely paper based and should be brought up to date.	Some aspects of communication still require the sending of paper records	Within statutory limits, utilise technology and the use of electronic media as much as possible.
There should be a focus on persistent offenders?	Operators are penalised for a first offence	Some leniency for first offenders e.g. a warning letter with a focus on those persistently not complying
Lack of telephone support from the LLCS administration team	Often difficult to contact the office and a lack of flexibility	Improved contact points and a clear indication of LLCS policies online
Driver and operator notifications are often sent to the incorrect recipient	N/A	Improved back office reconciliation
There is a lack of communication regarding the official policy on PCNs for both the operator and driver, and this process needs to be clearer	N/A	Clear publication of policies and explanation in responses
Administration errors i.e. incorrect enquiries from London Councils	Queries are often sent to operators complying with the scheme	Develop an automatic white list and improve the management of the EF119 process

It was clear that the operators believe that improvements could be made to the administration process.

Many operators agreed that the current permission life of three years could be extended to five years to reduce the administrative burden of managing this process for both operators and London Councils. The process of adding and removing vehicles should be made easier with an exploration of providing an electronic warning message for each vehicle whose permission is about to expire. This could assist with compliance and reduce the frequency of PCNs issued to operators where permits have expired.

Operators indicated that London Councils should explore acquiring a mapping/routing tool to improve operator and driver confidence in their journey planning. A readily available tool of this nature would assist with compliance.

Where possible, London Councils should provide operators and drivers with the ability to correspond with the administration team on all aspects of the administration process, including permission applications, general correspondence, representations and appeals. There should be an electronic, interactive hub or portal made available.

Many operators vocalised that they often had to respond unnecessarily to EF119s, when their vehicles were already on compliant routes. Whilst the LLCS administration team will often check on a vehicle route, there was a feeling that all too often there are persistent requests for evidence for the same location. London Councils could look to manage a 'white list' process electronically to reduce the administrative burden for all users.

Operators felt that there were often delays in response times for correspondence. It was also suggested that

London Councils should do more to deal with operators who persistently flout the terms and conditions of the scheme on a regular basis. More could be done to improve compliance; ensuring operators have the necessary tools to adhere to the scheme rules.

In line with some of the issues raised in previous discussions, there was an underlying feeling that London Councils should promote the scheme more, regarding its rules and regulations and advise on what should be done to avoid the risk of receiving a PCN. In addition to this, London Councils should seek to improve all communications links using the engagement mechanisms made with all stakeholders and utilising a variety of networks.

## Enforcement of the LLCS

Issues	Evidence	Possible Solution/action
The difficulty in under taking ad hoc out of hours work at short notice and arranging this with the LLCS in time	Some work is arranged at short notice and may be of an emergency nature so it is key to be able to discuss this	Improved routing tools and contact points that would make this process easier and possible exemptions for emergency work
Enforcement should be undertaken by cameras to provide consistency and detailed evidence of possible contraventions	No current CCTV and photographic footage	London Councils should explore the use of ANPR and CCTV to provide consistent levels of enforcement and evidence of contravention
There is inconsistencies in receiving PCNs	Operators will often take a route without any issues for months and then suddenly receive a PCN or EF119	Consistency with enforcement and engagement with operators.
Delays in communication with respect to EF119s and PCNs	N/A	All opportunities to use electronic notification such as email should be made and all letters logged electronically to speed up the process
Lack of data on compliance and information of key enforcement locations where compliance is an issue	N/A	More research and data gathering is required utilising existing networks and undertaking specific LLCS research
Appeals process is inconsistent and takes too long	N/A	Improve electronic communications and ensure appeals are valid in the first place.

There were a number of issues highlighted at the discussions surrounding both the on-street enforcement methodology and the back office processes.

Some operators believed that the enforcement process should take advantage of the current technology available, utilising CCTV and ANPR where appropriate. This would provide footage of any potential

contravention and therefore video and photographic evidence would also deliver more consistency in the enforcement approach which was also identified as an issue.

The lack of data on compliance of the scheme especially around key locations was also emphasised as an issue. By utilising the data that any use of CCTV and ANPR will provide, together with regular surveys and research into compliance, London Councils could improve on the data available.

Also of concern, were some of the inconsistencies and delays with the back office process, in many cases, surrounding the perceived 'arbitrary' issue of PCNs or EF119s to vehicles taking regular routes. London Councils could address this issue by utilising enhanced electronic white list technology as part of an improved case management system, which will also bring efficiencies in dealing with correspondence.

Improvements in routing tools and communications avenues with London Councils should assist operators with notification of ad-hoc short notice journeys.

#### d) Borough Survey

The borough survey was sent to all 32 London Boroughs and the City of London to gauge their views of the LLCS and those of their residents.

Using several points of contact including highways and transportation departments, environmental teams and those dealing with freight, London Councils requested a singular response from each borough.

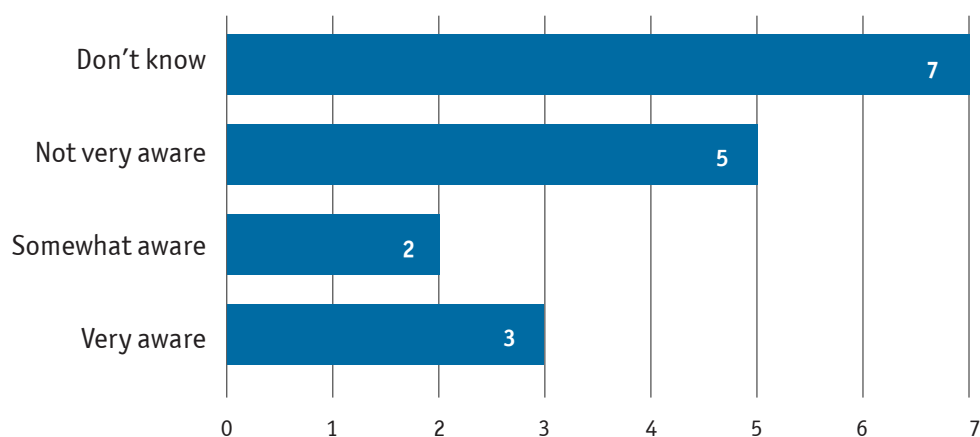
London Councils received 17 borough responses to survey. The breakdown of responses is contained below:

##### Q1. Which borough do you represent?

The following boroughs responded to the survey in full:

LB Bexley	LB Islington
LB Brent	RB Kensington and Chelsea
LB Bromley	LB Lambeth
LB Camden	City of London
LB Croydon	LB Merton
LB Enfield	LB Redbridge
RB Greenwich	LB Southwark
LB Harrow	City of Westminster
LB Hounslow	

##### Q2. How aware are your residents of the London Lorry Control Scheme?



The majority of responses to this question indicated that boroughs' residents either did not know or they believed that they were not very aware of the scheme. This implies that publicity of the existence of scheme could be improved.

It is likely that residents only become aware of the scheme if they are directly affected by freight movements and the impact the noise would have on them. Most residential areas will not have been impacted by noise pollution, due both their geographical location and to the enforcement of the scheme; it is likely therefore that this is why a lack of awareness can be explained.

Whilst London Councils administers and enforces the scheme on behalf of boroughs, there is no regular engagement with them surrounding the day to day running of the scheme, compliance levels and often, the only contact is when the borough receives a complaint. It is important, going forward, to increase engagement and utilise borough networks to provide more information of how the scheme is performing.

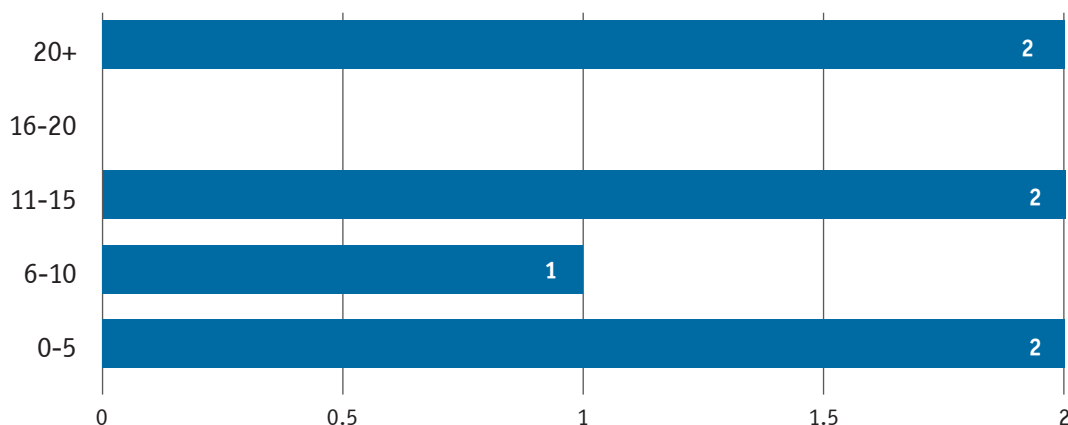
### **Q3. Have you received any noise complaints in your borough relating to HGVs during the hours of control in the last 12 months?**

Seven boroughs indicated that they have received complaints during the last three months with the majority of others indicating that they did not know.

Of those that indicated complaints had been received the following was noted:

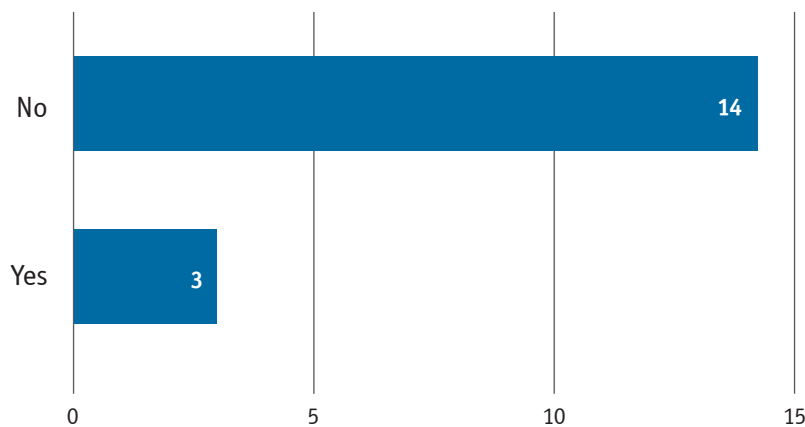
- *'There has been a rise in 'rat-running' during the hours of the operation of the scheme, as well as peak hours. The most common is associated with drivers following satellite navigation systems which has also caused issues with construction traffic not following designated routes to sites' (Southwark).*
- *'We receive complaints re delivery and construction traffic but these are not necessarily associated with movements relating to the LLCS as these are unknown' (Camden).*

### **Q4. How many complaints have you received in the last 12 months?**



There was a split between the seven boroughs who indicated that they had received complaints. Two boroughs noted receiving over 20 complaints and LB Southwark recorded a total of 118 complaints. These and other records of complaints that boroughs have received do not necessarily relate to the LLCS but also include noise at the point of delivery and engine idling. It would be beneficial to work closer with boroughs in the future, in order to respond and manage such complaints in more detail. This would also help to improve the data collection and enforcement practice.

**Q5. Are there any roads within your jurisdiction that you want to be re-assessed for inclusion or removal from the Excluded Route Network (ERN)?**



Three boroughs responded indicating that they believed a reassessment of the ERN is required. However, the vast majority demonstrated that it is currently fit for purpose and changes should not be made.

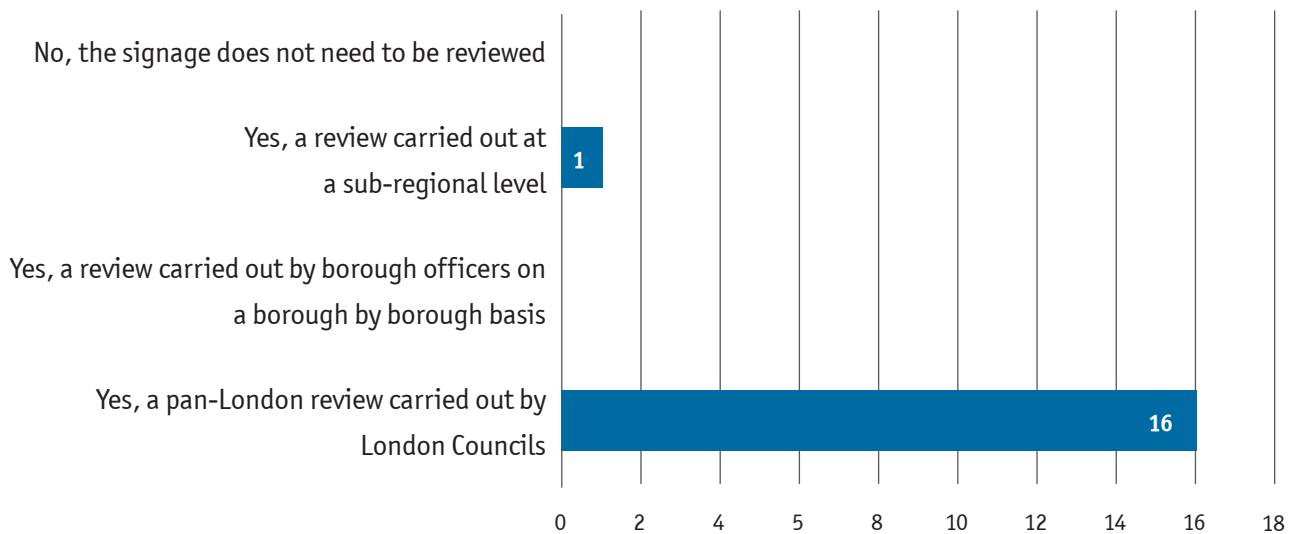
Whilst these comments are noted, London Councils is aware that the road network has undergone several changes since the last review in 2010 and will engage with boroughs and TfL to assess the suitability of the current network.

**Q6. Please specify the route(s) that need to be reviewed and reason for them to be included/removed from the ERN.**

No borough expressly indicated routes and areas that they believed were applicable but we received the following comments:

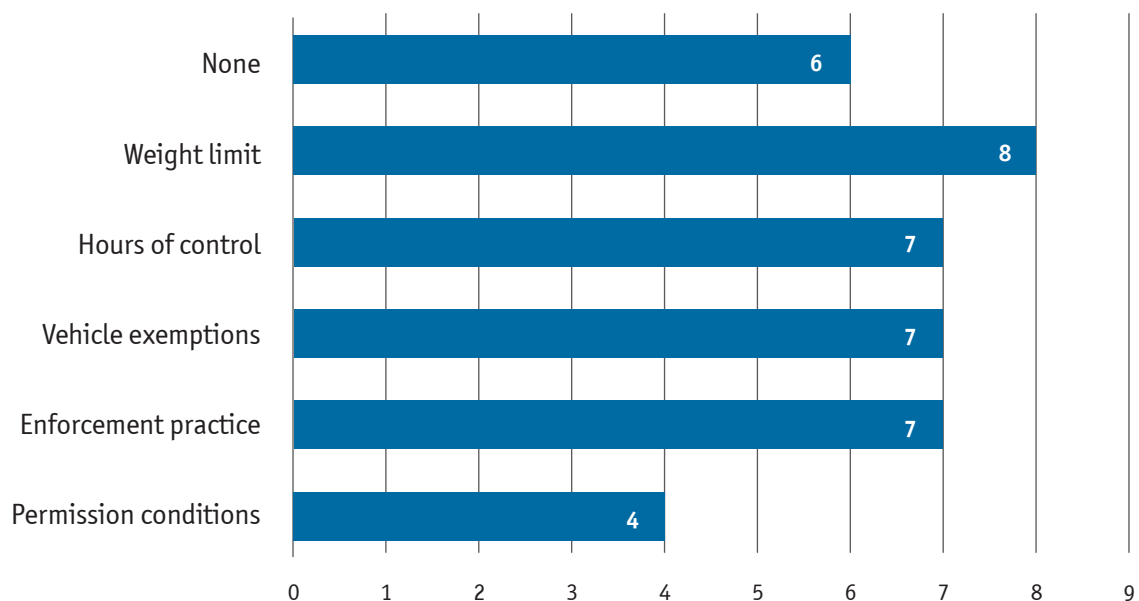
- *'We believe this has not happened for eight years, so should be carried out' (Bexley)*
- *'Many roads are changing from industrial/commercial to mixed use/residential so a review would be timely' (Southwark)*
- *'We would be interested in doing this' (Croydon)*

**Q7. Do you believe that there should be a review of the scheme's road signage?**



All of the boroughs responding, believed that a signing review would be beneficial with 16 out of 17 indicating that it should be a pan-London review, carried out by London Councils. Confirmation that boroughs are supportive of this is welcoming, as engagement with them when undertaking this work is key. There is an importance in having a London-wide signage strategy for the LLCS, with due consideration to the erection and maintenance of signs.

**Q8. Are there any aspects of the London Lorry Control Scheme that could be changed to better suit the needs of your authority while still considering the impact on your local residents and businesses? Q9. If so which aspects? Q10. Why should these aspects be changed?**



There were multiple responses to this question from boroughs so each area will be detailed in turn.

## **Weight Limit**

Eight boroughs indicated that the weight limit should be reviewed, providing some of the following comments:

- 'The 18 tonne weight limit is not fit for purpose and poor proxy for noise impacts. Some smaller vehicles are noisier (e.g. skip lorries) and should be controlled. A moving vehicle noise standard would be desirable' (Camden)
- 'There is scope for the weight limit to be lowered below 18T to include skip lorries. Noise standards are more important than weight standards'. (Brent)
- 'Consider noise measures as well' (Lambeth)
- 'Many complaints focus on smaller (7T) vehicles using streets as a cut-through. If more deliveries using these are going to occur, then we need a tighter enforcement regime, (Merton)
- 'The current weight limit should remain but supplemented by tipper and skip lorries at any weight' (Westminster)
- 'The size of the HGV is as much of an issue as weight; we would like research into the weight and size of vehicles and their need to come into London. There may be alternative solutions in keeping the largest trucks out of Central London e.g. freight distribution centres' (Islington)
- 'Given that research indicates that noise levels between 18 and 44T are negligible, this distinction is now irrelevant' (Redbridge)

## **Hours of Control**

Seven authorities highlighted the hours of control as something that needs to be reviewed. Some comments are contained below:

- 'Should the evening window be widened to 10pm? This would allow more off peak evening deliveries' (Brent)
- 'Extend the hours of control' (Lambeth)
- 'Consideration should be given to PIEK type regulation (peak noise measurements during loading and unloading), so that operators using quiet vehicles and practices can deliver at any time. Existing local authority noise management powers should be sufficient to manage this.' (Redbridge)
- 'These could be liberalised to include Saturday and Sunday in view of retiming' (Camden)
- 'Perhaps in line with retiming of deliveries' (Croydon)
- 'We would not object to it starting at 10pm rather than 9pm' (Kensington and Chelsea)

## **Vehicle Exemptions**

Seven authorities highlighted vehicle exemptions as something that should be considered as part of a future review. Some comments are contained below.

- 'Consideration should be given to exclude electric vehicles' (Camden)
- 'Cleaner and quieter vehicles should be considered for an exemption' (Lambeth)
- 'Exemptions should be considered for electric and plug-in hybrid HGVs and the latest Euro 6 with quiet technology' (Brent)
- 'No tipper or skip lorries should be granted exemption on account of the noise they make' (Westminster)
- 'Make exemptions more difficult and are monitored to make sure they comply with the conditions of exemption' (Islington)



## Enforcement Practice

Seven authorities highlighted this as an area for future work. Some comments are outlined below:

- 'More work is needed to understand the level of activity and compliance and we are planning surveys to understand the types of contraventions. There are advantages to using local enforcement of the LLCS including CCTV' (Islington)
- 'Continue on-street activity, with the additional use of CCTV and ANPR especially at key junctions' (Westminster)
- 'A comprehensive review with key stakeholders is required. Air quality rather than noise is more important and is no longer a justified measure of enforcement' (Redbridge)
- 'Enforcement should use ANPR technology this would assist with compliance and make processing more efficient. It could also help to liberalise weekend deliveries for some sectors'. (Camden)

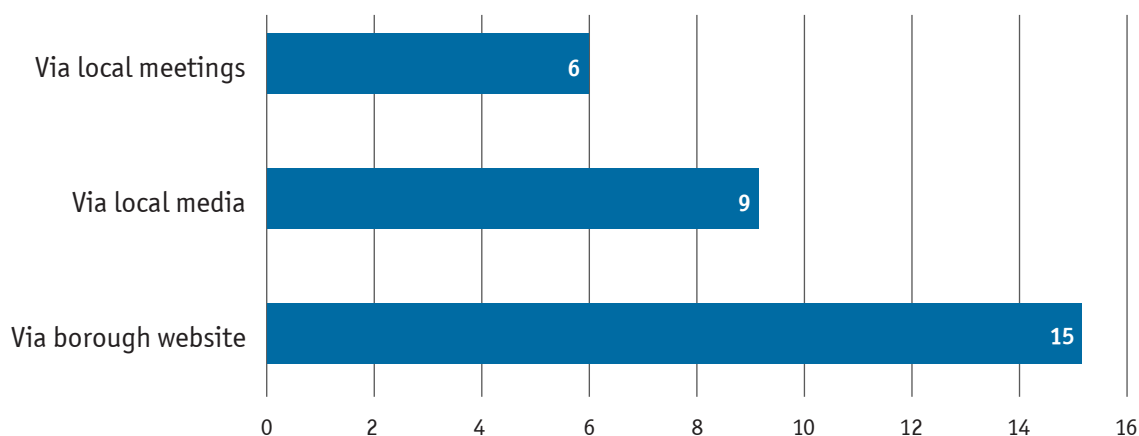
## Permission Conditions

Four authorities highlighted this as an area for future focus. Some comments are outlined below.

- 'More information on this is required to help hauliers understand the scheme better and improve compliance' (Lambeth)
- 'Routing should minimise distances to mitigate the impact on air quality'. (Redbridge)
- 'These should cover LEZ, the proposed Direct Vision Standard (DVS) and other relevant pan London schemes' (Camden)

A total of six authorities indicated that no changes should be made to the scheme. Whether this indicates that they believe that the current operation and terms of conditions of the LLCS are fit for purpose or that borough engagement with the scheme operationally, is so minimal that they have no involvement is not known. Nevertheless, London Councils will be looking to interact on a much greater level with boroughs.

## Q11. How can London Councils best facilitate communications with your residents about future changes to the scheme?



London Councils is committed to further engagement with residents regarding any potential future changes to the LLCS.

Borough responses were supportive of wider public engagement making use of our borough networks.

Improving the LLCS communication links with borough websites and the networks is highlighted as a suitable way of increasing the ability to publicise any potential changes to the scheme. Engagement with local media and presenting details at local meetings were also felt by some boroughs as important ways of increasing awareness of the scheme.

Comments from boroughs included:

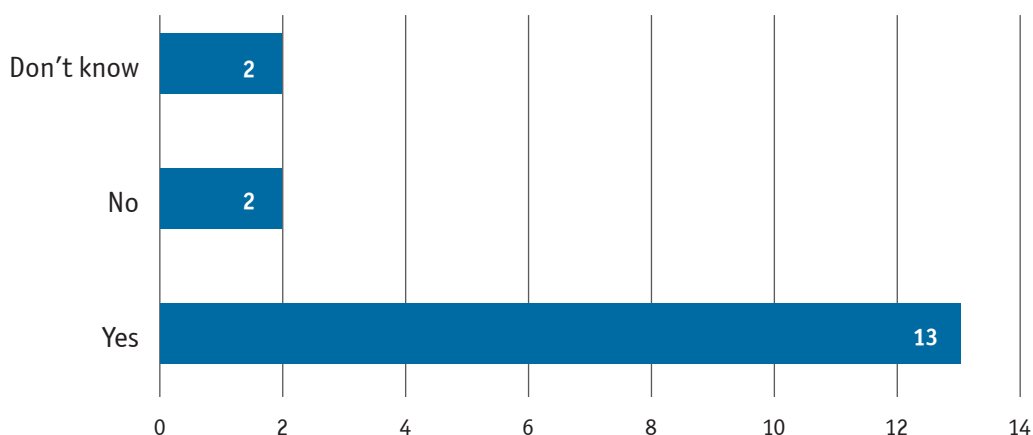
- 'It would be useful to engage with boroughs' communication teams to outline a local strategy' – Islington
- 'Most residents would not look at publications relating to the LLCS, so it may be better to approach Councillors. Targeting meetings and forums in areas where freight movement impacts are greatest would also be useful'. – Hounslow
- 'The Westminster Reporter magazine goes to every household so that would be a good medium'. – Westminster
- 'Greater use of Twitter' – Merton
- 'An engagement plan for liaising with residents is key, using a variety of channels' – Camden
- 'Utilise residents association email lists' – Kensington and Chelsea

#### **Q12. Does your borough keep a detailed inventory of the location and condition of LLCS signs on your network?**

The vast majority of boroughs were unable to confirm whether they currently held a detailed inventory of the location or condition of LLCS signs. The exceptions to this were Hounslow, Kensington and Chelsea and Westminster.

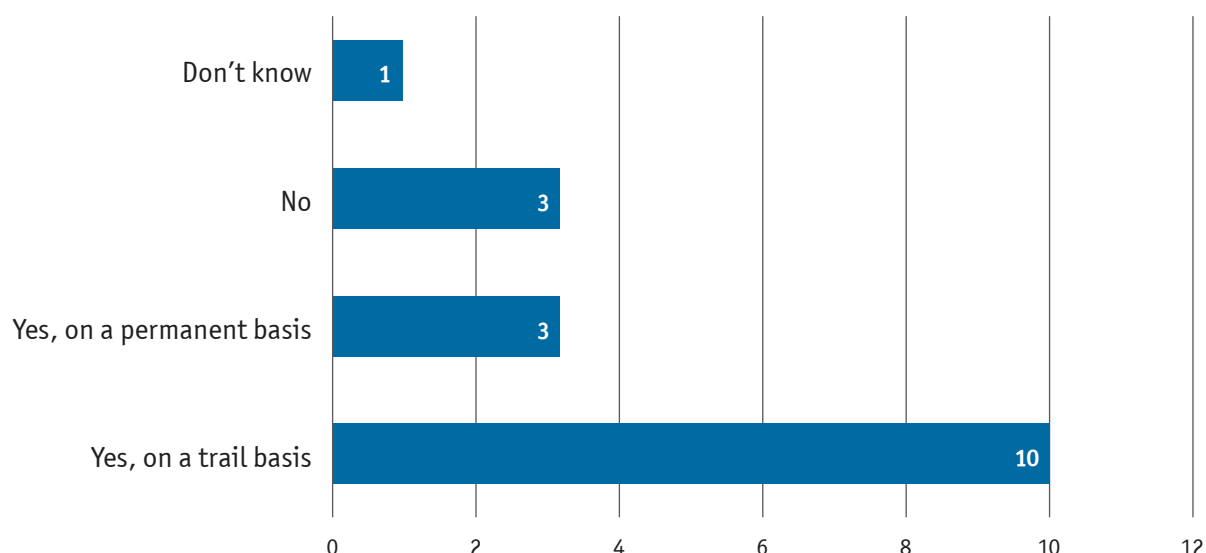
It is clear therefore, that work needs to be undertaken to produce an inventory of signs as highlighted in Question 7. London Councils working collaboratively with boroughs would be best placed to create and document the inventory.

#### **Q13. Would you consider sharing access to any of your existing CCTV camera for the purposes of enforcing the LLCS?**



The vast majority of boroughs were supportive of sharing their CCTV network. This option will be explored more fully, taking into account key locations where incidents of non-compliance are more likely to occur. Those that were not supportive either did not have a CCTV network (Kensington and Chelsea) or believed that their operations were already at full capacity (Camden). Two boroughs were not in a position to confirm either way.

**Q14. Would you consider allowing London Councils, via a third party, to install CCTV/ANPR cameras on your network?**



Once again, the majority of boroughs were supportive of the potential installation of CCTV/ANPR on their networks for a trial period or on a more permanent basis.

London Council could investigate options to pilot ANPR and CCTV for the future enforcement of the LLCS. There is also scope to develop a noise monitoring model, which could be undertaken with CCTV/ANPR capability.

**e) London Freight Borough Officer Liaison Group (BOLG) Workshop**

The BOLG workshop was held on the 12 May 2017 comprising of two workshop discussions which focused on the following key areas:

- The Effectiveness of the scheme
  - What are your/your resident's major concerns about HGV movements?
  - How effective is the LLCS in addressing these views and concerns, and what local controls would be required in its absence?
  - What level of awareness is there locally of the scheme and how much do you think this matters?
- Options for change and improvement
  - Extent of the scheme – excluded and restricted roads
  - Weight restriction and the hours of control
  - Enforcement and signing

Results from these discussions can be seen in the tables below

## Session 1 The Effectiveness of the scheme

### What are your/your resident's major concerns about HGV movements?

Issues	Evidence	Possible Solutions
HGVs using residential roads as 'rat runs' at all times during the day and night	The complaints received confirm this but more research is needed into such activity	Improved data and research and the development of LLCS routing and mapping tools
Night time complaints of noise on and off the ERN	The complaints received confirm this but more research is needed into such activity	Impact studies and improved data
High level of noise from construction vehicles both around sites and travelling to and from them.	Difficult to know without data provision	Improve data and review hours of control and weight limits and continued working with the sector e.g. CLOCS
Noise pollution from all types of vehicles including those not subject to the scheme e.g. buses and skip lorries	More data and research including surveys on the problem is required	More research and the development of a noise standard to capture this activity
Noise pollution at point of delivery and driver behaviour when loading and unloading	Complaints from residents is higher in this area	More data required and continued work with operators to encourage positive behaviour (e.g. FORS)
Drivers parking up in unsuitable areas having rest breaks prior to commencement of control to avoid non compliance	Complaints from residents	More operator engagement from boroughs and a review of the hours of the scheme
Physical vibrations felt from the movement of HGVs	Complaints from residents	More research and surveys in affected areas to ascertain the nature of the problem
Too many HGVs adding to congestion	Increased freight movement and deliveries of both Light Goods Vehicles (LGV) and HGV creating congestion	Work with TfL's retiming deliveries program and undertake more research into freight movements
Restricted roads are often not suitable and too narrow for HGV movement	N/A	Assess ERN and restricted road network. Local controls could be an option where appropriate.
Speed humps and tables and the condition of the road surface add to the noise pollution	Complaints regarding noise as vehicles have to navigate over poor surface and traffic management controls	Assess ERN and restricted road network. Boroughs to assess these controls.

The scheme is operated without a noise standard	N/A	Investigation into the development of a noise standard
There should be more vulnerable road user awareness	N/A	Continued engagement through freight schemes such as FORS and CLOCS and improved communications
What impact does the scheme have on air quality and emissions?	N/A	More research and data is required on the effect of freight and specifically the impact of the LLCS
More clarity from London Councils on what the scheme does and is used to control	N/A	Improved communications
Specific local delivery arrangements mean there is a lack of flexibility with regards to vehicle movements	Planning controls and a desire to undertake deliveries within 'office hours' remains a factor	Work with TfL's retiming deliveries program and undertake more research into freight movements
Possible lower number of complaints regarding HGV movements compared with LGV movements may suggest compliance is good and the scheme works	N/A	Further research into compliance and the impact of the scheme

The concerns that boroughs and their residents have regarding freight movements are different from the freight sector. Engagement with the boroughs indicated that they and their residents do believe that there continue to be issues with respect to freight movements and the noise created, both during the hours of control and more generally when the scheme is not in operation. The majority of this focussed on the use of unsuitable residential roads that may have an uneven surface or have traffic calming measures, which add to the impact of transient noise and vibrations.

Some boroughs noted that the noise is not necessarily the result of larger HGVs but can be attributed to buses, skip lorries and motorcycles. Therefore, the scope of developing a noise standard would be welcomed, alongside investigating the feasibility of either increasing or decreasing the weight limit.

Boroughs also highlighted issues relating to noise at the point of delivery and idling vehicles waiting to access sites or taking rest breaks. Whilst these are not a direct result of the scheme, it is possible that a review of the scheme hours and further engagement with freight management schemes such as FORS and CLOCS could reduce this impact.

It is clear from a significant number of the issues raised that more communication and clarity about what the scheme sets out to achieve is key to this review. Further research and data collection for freight movements and how the scheme impacts on deliveries, are vital in assessing how the scheme functions now and how it can be improved for future enforcement purposes.

There were positive comments from boroughs indicating how effective the scheme is at controlling HGV movement and reducing the impact of noise for London residents. This is explored in more detail in the following section.

## How effective is the LLCS in addressing these views and concerns and what local controls would

Issues	Evidence	Possible Solutions
The scheme is effective but more data is required to assess the full impact	Compliance appears to be high and complaints are low	More research and data into the effectiveness of the scheme
Level of public complaints is small which suggest that the scheme is effective	Compliance appears to be high and complaints are low	More research and data into the effectiveness of the scheme and freight movements in general
Without the scheme there would be a requirement for more local restrictions which would involve a planning cost and enforcement capability per borough	Boroughs could create a cost based analysis to determine any financial implications and requirement of individual local restrictions	LLCS needs to remain in place but a review is necessary
More local weight, height and width restrictions would have an increased impact for operators	It is likely that the network would be more restricted	LLCS needs to remain in place but a review is necessary
Without the LLCS, controls would be fragmented which would have an impact on vehicle movements and effective enforcement	An approach that is not co-ordinated could lead to a 'hotchpotch' of restrictions if individual boroughs create more controls	LLCS needs to remain in place but a review is necessary
What controls are in place to deal with persistent evaders?	N/A	London Councils to review terms of conditions and increase operator engagement
Are the current fine levels enough of a deterrent?	New additional parking charges consultation would provide appetite for this	An increased penalty may be a bigger deterrent and could be explored

Boroughs stated that they believed the scheme was an effective method of the control of freight movement in London. It reduced the instances of complaints of noise pollution and should remain in place. However, they did indicate that more data and research into the effectiveness of the scheme needs to take place to assess the impacts of the LLCS now and form the basis of how the scheme could be improved in the future.

The majority of boroughs agreed that more local controls including weight and width restrictions would be implemented if the scheme no longer existed. This would create more costs to boroughs in assessing, implementing and enforcing any new restrictions and undoubtedly lead to a fragmented and incoherent network. This would inevitably be more restrictive and costly for freight operators too.

More engagement with operators to improve compliance was again suggested as was a review of the fine level.

## What level of awareness is there locally of the scheme and how much do you think this matters?

Issues	Evidence	Possible Solutions
Unless directly affected by HGV noise, awareness of the scheme may be minimal. Is this important?	The public only tend to complain when they have an issue	Increase engagement with boroughs and their networks including residents' committees and Councillors
Residents do not know who to contact in the event of a disruption and are unaware that any action can be taken	N/A	Improve public awareness, communicate better with boroughs and update the LLCS website
Residents are unsure of how the scheme operates and the impact it has on their own noise experience	N/A	Improve public awareness, communicate better with boroughs and update the LLCS website
Increased public awareness could lead to more complaints	If more people know how to deal with noise then complaints could increase	Ensure that avenues are open to engage with complainants and tailor enforcement accordingly

Boroughs indicated that that Londoners' awareness of the scheme is minimal, often only becoming familiar with it if they are directly affected by noise and over activity of HGVs. Most boroughs felt that this was not necessarily a bad thing but agreed that improved engagement and focussed communications would help. This would also highlight boroughs' concerns about freight disruption and help to inform that controls are in place.

It was agreed that any public engagement is likely to improve awareness of the scheme but may lead to increased level of complaints. London Councils would therefore need to ensure that processes are in place to deal any such increase swiftly and effectively.

## Session 2- Options for change/improvement

### Extent of the Scheme - excluded and restricted roads

Issues	Evidence	Possible Solutions
The current road network is fit for purpose and the ERN should not decrease	N/A	There should be no changes to the ERN and restricted road network
The ERN may need to be updated in line with improved/changed road layout and use in line with improvements and remodelling of the highway	Some roads have changed whilst others have different priorities	Consultation with authorities to examine the current network and assess the future network requirements.



The ERN should reflect the current TLRN and should include all major 'trunk roads'	Simpler for operators and the public to understand	Consultation with authorities to examine the current network and assess the network
If network changes are required more could be made of temporary traffic orders, giving more flexibility.	Would improve compliance where temporary restrictions are in place	London Councils should assess the feasibility of doing this and how it could operate
There should be more integration with other schemes	With schemes such as the SLS and LEZ is there scope for a Lorry Scheme for London?	London Councils should assess the feasibility of doing this and how it could operate
Routing requirements should be simplified	More data required	Improved routing tools and improved data on routing and the additional journey times for operators
Idling and breaking noise at traffic lights	Vehicles are often at their noisiest when slowing down, speeding up or breaking.	Could traffic light priority be given to HGVs at night?

Views during this session were mixed, with some boroughs stating that the current network should not be amended whilst others indicating that some updates are necessary.

The ERN was last updated in 2010 and has been amended on a number of occasions since the scheme was introduced in 1986. As part of any future work that London Councils will be undertaking, there will need to be further engagement with key stakeholders and a public consultation to ensure that the current network is fit for purpose. We are aware that changes to road layouts that have already been implemented will require this, as well as changes in land use. It has been suggested that the ERN should follow the TLRN (which it already does to a large extent) and possibly the major 'A' roads into London. This will need to be explored in detail.

Boroughs also indicated that there should be flexibility to allow for temporary traffic orders to be used on the ERN, for example, where there are changes to land use or road layouts that have an impact on the ERN and restricted road networks. This could be explored in more detail.

Further research into the integration of vehicle management schemes such as the LLCS, LEZ and SLS was highlighted by the boroughs as something that should be examined. If there are clear benefits for residents and hauliers, improving understanding and compliance of all associated controls in London then serious consideration should be given.

## Weight restriction and the hours of control

Issues	Evidence	Possible Solutions
The weight restriction should be reduced to 7.5T	Some of the noisier vehicles are below 18T, so what data quantifies an 18T limit?	Further research and an expansion of the scheme for smaller vehicles. Possible exemptions for the highest Euro standard vehicles and electric vehicles
The weight limit should be reduced to include vehicles currently not subject to the scheme such as smaller refrigerated units and skip lorries	Some of the noisiest vehicles are not subject to the scheme so should be included	Further research and data collection into decreasing the weight limit with possible piloting of changes
Even if the weight limit was reduced, it does not mean that larger quieter vehicles are suitable for restricted roads	N/A	Exploration into this
Noise should form part of the enforcement process	More data required	Research into creating a noise standard and the current ability to enforce this
Industry sees the LLCS as a barrier for re-timing deliveries	Many operators have stated that they are put-off due to the hours of the scheme	Engagement with the sector and further collation and analysis of data that could support measures to reduce the impact
Could the hours of the scheme be extended to allow extra delivery time of an evening	Does not cater for the demand for local deliveries and range available	Further research into the effects of any change and the creation of pilots could provide the data to support this.
The hours of control of an evening should be extended to 10pm	Does not cater for the demand for local deliveries and range available	Further research into the effects of any change and the creation of pilots could provide the data to support this.
The hours of control should be extended from 11pm to 6am or 12pm to 5am in line with noise enforcement legislation	Busy 24 hours cities with sufficient ambient noise require an extended period of non-controlled hours	Further research into the effects of any change and the creation of pilots could provide the data to support this.
Changes of controlled hours should occur on a Saturday, but be kept on a Sunday	Saturdays are now a busy working day and should not have an afternoon restriction	Further research into the effects of any change and the creation of pilots could provide the data to support this.

The hours of control at a weekend should be in line with the rest of the scheme	Significant deliveries need to happen of a weekend to cater for public demand	Further research into the effects of any change and the creation of pilots could provide the data to support this.
Safety and congestion is more important to people than noise pollution	Competition for road space with vulnerable users should be minimised at peak times	Research into how can the scheme be improved to address all environmental and safety concerns
What would the impact be on air quality if changes are made to the hours of control	Improved data required	Further research into travel distances, freight volumes in London if hours are reduced
A hierarchy system should be introduced allowing vehicles that have to operate during the hours of the scheme, have the ability to do so.	N/A	Feasibility study into a range of exemptions depending on the type of journey and reason

The results of the borough discussions were at odds with the freight industry discussions. The majority of boroughs indicated that any changes made to the weight restriction should be a reduction to 7.5T, rather than increasing the weight. This would mean that more vehicles would be subject to the scheme's rules. It was felt that the newest, cleanest and quietest vehicles proven to be compliant with the latest Euro standards and electric vehicles could be included in the exemptions, which could make the scheme less restrictive for operators.

With respect to the hours of control, the consensus was that these could be reduced to facilitate a larger delivery window. This is in-line with the views of the freight industry. There were some differences of opinion as to the extent of any change between boroughs ranging from the following:

- A small extension of one hour in the evening to 10pm
- On extension of three hours in the evening to 12pm
- An additional hour in the evening and a reduction of one hour in the morning (10pm -6am)
- An additional two hours in the evening and a reduction of two hours in the morning (11pm -5am)
- A change of restrictions on a Saturday to bring it in-line with week day hours of control
- Keep the scheme operational all day Sunday
- Bring the same hours of control every day of the week (no additional weekend hours)

London Councils should assess and undertake research into these recommendations and could look to pilot any changes to enable analysis of the effects.

## Enforcement and signing

Issues	Evidence	Possible Solutions
Enforcement should be undertaken to include CCTV and ANPR	Has a positive effect on compliance, provides evidence and means that enforcement is consistent. Cameras also assist with data collection	London Councils should examine the use of CCTV and ANPR working with boroughs and the LLCS enforcement contractor
Enforcement should be based on an environmental noise standard.	N/A	Work with borough officers and industry to help develop a noise standard and assess whether enforcement using this is possible
There are too many enforcement schemes for freight operators in London	N/A	Assess the scope of establishing a single set of rules for freight movements in London
What does ineffective compliance look like?	Lack of data on compliance	Improved data, HGV tracking to provide hotspots and real time routing to assist operators
Street clutter	Too many signs at multiple locations often in conflict with other restrictions	A signing review and possible rebranded signage on the boundaries of the scheme
Poor condition of existing signs	Some signs are incomplete, poorly maintained and not at the right location	Full review of existing signage and an update when any revised on-street rules of the scheme are implemented

Boroughs agreed with the operators that in addition to the current on-street enforcement methodology, the LLCS should consider using CCTV and ANPR. Not only will this boost coverage and ensure that there is a more consistent approach to enforcement, it will provide valuable data on freight movements and compliance where cameras are deployed.

There were further comments on the use of a noise standard as a basis for enforcement, as well as the linking of the LLCS to other enforcement schemes.

An analysis of current signs needs to be carried out, with a review of the requirement of them to reduce street clutter and maintenance costs.

# Possible Solutions and Recommendations

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Following the substantial engagement with the Working Group, freight industry and boroughs, all comments have been analysed to form a series of recommendations.

These recommendations were presented to a joint meeting of the Steering Group and Working Group members for comment and discussion on 24 May 2017 and were later agreed by London Councils Transport and Environment Committee on 15 June 2017 - <http://www.londoncouncils.gov.uk/node/31932>

The recommendations focus on the following key areas:

- Awareness and Communication
- Technology
- Enforcement
- Administration

Each of the recommendations are described below in detail and outline the proposed timescales for implementation:.

- Short-term: 0 – 6 Months
- Mid-term: 6-18 Months
- Long-term: 18+ Months

It should be noted that there are identifiable aspects of the current LLCS that can be amended relatively quickly. These include the communications and awareness of the scheme and back office administration process that do not impact the current terms and conditions of the scheme.

To change the LLCS objectives and TMO will take a longer period of time and will require further research, investigation and impact analysis to ensure that any agreed proposals will meet the needs of Londoners and allow the freight industry to continue to fulfil their important role for London. These have therefore been identified as mid or long term recommendations.

Each recommendation has been given a code to help with identification and assist with future planning and project management.

## **a) Communication, Awareness and Understanding of the Scheme**

### **Issue 1**

A lack of understanding of the scheme by both the public and freight operators

### **Recommendation 1**

#### **Rebranding and promoting the scheme:**

It was clear from all discussion groups and survey results that awareness and understanding of the LLCS, its aims and how it achieves them were not well publicised and could be clearer.

London Councils propose a re-branding of the scheme and the introduction of an LLCS logo, with an emphasis on clearer and more focussed promotion.

By improving understanding of the scheme and establishing a closer relationship with our key stakeholders, we would hope to achieve better compliance. We propose to engage more with London boroughs to include links and details of the scheme through their websites and wider networks. Improved public understanding may result in increased complaints and public queries in the short term but improvements in the information provided should mitigate much of this.

We will also look at redefining the ERN and restricted roads within the terms of conditions of the scheme, which was highlighted as being confusing by some stakeholders. These are currently both negative descriptions so the ERN could be amended using more positive terminology that would emphasise that their use is permitted.

With the exception of redefining the ERN, which may need changes to the TMO depending on how this is undertaken, this is something that can be achieved in the short term and we will look to commence implementation of these changes as soon as approval is received.

**Timescale:** Short-term (but ongoing to advise of any future changes to the scheme).

## **Recommendation 2**

### **Wider Industry Engagement with URL links to other transport websites**

One of the issues highlighted during industry engagement was the lack of knowledge of the LLCS from operators outside of London who seldom do business in London. It is often these operators that get caught out by the scheme due to a lack of understanding of the rules and regulations.

London Councils will widen engagement with the freight sector to promote the scheme in London, nationally and in Europe using existing freight and business networks. Improvements on a national and European level should provide operators with the information that they need to plan and undertake their work more effectively and help them avoid non-compliance. Engaging with Europe should also help in reducing incidents of non-compliance which has been highlighted as a problem by UK operators.

This is something that can be achieved in the short term and we will look to commence implementation of these changes as soon as approval is received.

**Timescale:** Short-term

## **Recommendation 3**

### **LLCS Website Review**

The freight industry indicated that whilst the current LLCS website does contain useful information, this often is not clear or easy to find, whilst the website itself can be difficult to navigate.

As part of the re-branding exercise, London Councils will review the LLCS website, improving both the quality and type of information that is contained. The rules and regulations of the scheme will be made clearer, as will the current exemptions and details of special routing regulations. Improved information on how to contact London Councils for both operators and the public who have a query will be made available.

The current extent of the network needs to be clearer. We will engage with specialists to produce a revised interactive LLCS map that clearly shows the extent of the ERN and restricted road network.

The website will provide better operator advice and guidance of how to avoid a PCN, with a list of frequently

asked questions (FAQs) which should go some way to improve understanding of the scheme.

This is something that can be achieved in the short term and we will look to commence implementation of these changes as soon as approval is received.

**Timescale:** Short-term

## **Recommendation 4**

### **Single Portal**

During working group discussions it was highlighted that it would be advantageous for freight operators to be able to access a single portal for all schemes and controls affecting the freight industry in London. This should include the terms and conditions for the various schemes and link to the permissions database for the LLCS.

London Councils will liaise with TfL regarding the feasibility of linking existing networks within a single portal to make it easier for operators to find out about all the rules and regulations in one location via a single portal. This would need to be managed carefully so as not to confuse freight operators and drivers

**Timescale:** Long- term

## **b) Technology**

### **Issue 2**

Interactive online routing tool is unavailable

### **Recommendation**

It was highlighted by operators that an interactive LLCS map and routing tool provided by London Councils that could be downloaded as an app and incorporated into satellite navigation systems would be beneficial to freight operators, especially if it could route 'multi drop' options.

London Councils will engage with specialists to explore the options of developing an interactive map and online routing tool that would provide real time information. We would use an 'open data' format, allowing the information to be used by any interested technological app providers.

The costs, time, complexity would need to be explored. This would be long term recommendation but would give confidence to the industry when undertaking deliveries during the controlled hours of the scheme and could have a substantive effect on compliance.

The Working Group indicated that many operators would not object to a fair and consistent charge for real time routing information and would probably prefer to pay London Councils as the Administrator of the scheme rather than a third party. Any proposals for charging, perhaps by introducing a grading system would be explored in accordance with the total costs of providing such a tool.

Initial engagement with the technology industry will take place in the short -term; however the provision of such a tool if the decision to proceed with this proposal was granted will take longer.

**Timescale:** Short term for the initial engagement. Mid-Term for any works



### Issue 3

No vehicle noise standard

#### Recommendation

Both the survey and workshop engagement with operators and boroughs indicated that the LLCS is in place to reduce night time and weekend noise pollution but does not enforce on the basis of noise. It should be noted that whilst noise pollution is the basis of the scheme's existence, it is also a way of controlling freight movement on unsuitable residential areas. Nevertheless, investigations in developing a noise standard and at least in part enforcing the scheme on the actual basis of noise pollution rather than HGV weight should be explored, as this could potentially increase the scope of the scheme to capture all noisy vehicles.

London Councils will investigate the development of a noise standard that will apply not just to engine noise, but to more general noise such as transit conditions, airborne vibrations, tyre noise and road condition.

Working with industry and key stakeholders including the Noise Abatement Society, we will look to establish whether an effective on-street measure for noise is available or can be developed with a view to piloting such technology in a real life environment.

We are proposing to engage with other agencies and cities within the UK to see if they are supportive of this with a view to working collaboratively to improve efficiency. Once a noise standard has been developed and can be enforced on-street, we will look at possible exemptions to the scheme for the quietest vehicles including electric freight vehicles (EFVs).

The scope to link travelling noise to the whole delivery process could also be explored as part of the scheme conditions, although this would, in principle, change the objectives.

Initial work on developing both the standard and possible enforcement methodology will take place in the mid-term. However, it is realistic that any actual delivery will be in the longer term.

**Timescale:** Mid-Term to Long Term

### Issue 4

Limited enforcement practice

#### Recommendation

Current enforcement is outsourced to a civil enforcement contractor and undertaken by five Enforcement Officers on-street. It was highlighted in all the stakeholder engagement activities, that this could be improved to provide a more efficient and up to date enforcement regime.

London Councils will look to develop an ANPR solution with our enforcement contractor and case management system provider to see if this is an appropriate and suitable method of enforcing the LLCS.

We will pilot and evaluate the use of CCTV and ANPR to enforce the LLCS in key areas, whilst liaising with boroughs to see if it is feasible to enter into a CCTV camera sharing arrangement.

ANPR can be used to achieve a more consistent and widespread approach to enforcement and provides the

opportunity to collate enforcement data on non-compliance. London Councils will look to use this data to monitor traffic flows and congestion, as well as compliance levels to assist with future research into the effectiveness of the scheme.

Discussions with current contractors and boroughs will take place in the short term; with pilots for enforcement using camera technology being mid-term.

## **Issue 5**

HGV design standards

### **Recommendation**

With the improvements in HGV design and engine and brake noise since the scheme was introduced in 1986, it was felt that the requirements of the LLCS should be reviewed in light of this.

London Councils will investigate HGV design to establish a list of possible exemptions for operators with fleets of the quietest vehicles including EVs. This would be advantageous as many of the quietest vehicles are also the newest which would also have benefits on vehicle emissions.

We will liaise with the Department for Transport and relevant agencies about current and future HGV design standards.

This will be a long-term objective

**Timescale:** Long term

## **c) Enforcement**

### **Issue 6**

Excluded Route Network (ERN) and restricted roads

### **Recommendation**

Engagement with boroughs and freight industry resulted in differences about the extent of any review of the ERN. Nevertheless with a changing road network in London, it is important to assess whether the extent of the current ERN is fit for purpose.

London Councils is planning to review the ERN and restricted road network to take account of any changes to the road layout and recent development activity. This will be undertaken by way of a public consultation and engagement with boroughs and TfL with respect to the roads on their networks.

It has been suggested that the ERN should follow the TLRN more closely and we will examine the feasibility of doing this. We will also explore the possibility aligning the ERN with the 'A' road and previous 'trunk road' network to see if this could improve freight movement and congestion without impacting on residents.

We have been made aware that the extent of any current and future ERN needs to be made clearer and we will be reviewing mapping information in line with this recommendation.

We will also examine whether changes can be made to the ERN to take temporary restrictions and road

closures into account. Whilst this would require changes to the workings of the TMO which may be difficult, the future use of real time electronic mapping could make communication with freight operators easier if managed efficiently, improving compliance. However, this may be easier to achieve by sending an advisory bulletin and not enforcing in areas where such a restriction is in place which in essence is what is undertaken currently.

London Councils will explore the feasibility of wider integration of the LLCS with other existing controls such as the SLS or proposed Direct Vision Standard. We are currently in dialogue with TfL and are keen to explore whether a single permissions based scheme, perhaps with one interface creating a 'freight scheme for London' would be beneficial. A single portal may be welcomed by the freight industry and could improve compliance but this would need to be managed carefully if implemented.

Whilst we are looking to review the ERN as part of the future development of the scheme, this will be a long-term goal. Any agreed changes would result in amendment to the TMO and the requirement to have a public consultation.

**Timescale:** Long-term

## Issue 7

Condition and extent of signs

### Recommendation

It was clear from discussions that the current network and condition of signs could be improved.

London Councils will be embarking on a full review of the signs across London to establish a number of factors:

- The condition of existing signs
- Whether the signs are in the right place
- Whether signs are missing
- Whether the signs contain correct information
- Whether more advanced warning signs would help with compliance

As part of this review, London Councils will also investigate whether the extent of the LLCS could be signed differently, perhaps on the boundaries of London. This would require fewer signs, reducing costs and also help to minimise street clutter.

We will also explore options of not having on-street LLCS signs although this may prove difficult for communications and enforcement purposes.

It is unlikely that we would embark on the detailed replacement of signs until the full extent of future work is understood, as aspects such as the weight limit and hours of control may change. However, if any such review clearly indicates that replacement signs are needed at key locations then we would look at doing this earlier.

**Timescale:** Mid-term for the review, long-term for any wholesale implementation.

## Issue 8

### Hours of control

#### Recommendation

This was keenly discussed in all meetings and there was a general agreement between boroughs and the freight sector that these should be reviewed to reflect the changing way freight is delivered to meet the demands of a 24 hour city such as London. Interestingly, there was little appetite for increasing the hours. However there were a range of suggestions as to how the hours should be amended including:

- a one hour extension in the evening to 10pm
- An extension of three hours in the evening to 12pm
- An additional hour in the evening and a reduction of one hour in the morning (10pm -6am)
- An additional two hours in the evening and a reduction of two hours in the morning (11pm -5am)
- A change of restrictions on a Saturday to bring it in line with week day hours of control
- 11pm – 6am including Saturdays
- 11pm - 6am seven days a week.
- Keep the scheme operation all day Sunday
- The same hours of control every day of the week (no additional weekend hours)

London Councils is committed as part of an ongoing review of the LLCS, to investigate and research changes to the hours of control. More data is required into the implications of any change.

We will explore all of the options and look at the possibility of piloting any revised hours of control and monitor the impacts on both residents and freight movement as part of the review.

We will also look at whether different hours of control are suitable for different sectors depending on their needs.

Due to the research and future work needed to examine the impacts of any change and amendments to the TMO and signs, this is a long-term ambition.

**Timescale:** Long-Term

## Issue 9

### Current 18T weight limit

#### Recommendation

Should the current weight limit be reduced or increased and is weight the best way of enforcing the scheme?

London Councils is committed to reviewing the weight limit and will be conducting further investigations and pilots of the impacts of amending the weight restriction. We will also be investigating the feasibility of creating a noise standard as a possible future method of control and enforcement.

Further work will assess whether any weight limit should increase or decrease as opinion between the freight industry and boroughs was split on this issue.

Possible amendments to any weight limit were outlined as follows:

- The weight limit should be reduced to 7.5T
- The weight limit should be reduced to capture current HGVs not subject to the scheme
- The weight limit should be increased to 32 T
- The weight limit should be increased to 44 T
- There should be no weight limit, only controls on noise
- The weight limit should remain at over 18 T.

Any changes to the weight limit will affect the way enforcement is carried out. Research will need to take place into enforcement methods if weight limit revisions are made. This could involve changes to back office systems linking to DVLA data available on individual vehicle weights and types and the more comprehensive use of electronic white lists.

Due to the further research into the weight limit this will be a long term recommendation.

**Timescale:** Long-term

## Issue 10

Vehicle exemption limitations

### Recommendation

The possibility of reviewing the exemptions on the basis of noise control and the nature of work undertaken was discussed the Working Group meetings.

As part of the ongoing review into the scheme, London Councils will be assessing the current list of exempted vehicles and examining whether future exemptions on the basis of noise for those operators using the quietest vehicles would be suitable. With the increase in EFVs, London Councils will also be assessing an exemption for these vehicles that would usually be subject to the conditions of the scheme.

London Councils will also examine whether exemptions should be expanded to cover emergency works that are time-critical i.e. burst water mains pipes. This would need to be evidenced appropriately by an operator. We will also look at the process regarding short-notice routing applications made outside of office hours to see whether it is feasible for a dispensation to be given until a correct route is advised. Future developments of a real time interactive routing tool may negate the need for a specific action on this.

It is clear that more information on exemptions is required and these will be covered via the improvements in our communications work and vehicle standards research.

Due to possible changes to the TMO the final work on this is likely to be long-term but consideration of changes will be made in the mid-term.

**Timescale:** Mid to long-term

## Issue 11

Enforcement of foreign registered vehicles

### Recommendation

Both boroughs and freight operators asked what LLCS does to enforce against foreign registered HGVs that are contravening the scheme, as many vehicles of this type on London's roads are not registered in the UK.

The current European DVLA equivalent data is not available in the UK, so it is difficult to enforce against foreign vehicles when issuing postal PCNs for a moving traffic contravention.

However, London Councils will engage with European debt collection agencies to see if there is any possibility of working with them to collect outstanding penalties. Whilst these agencies do not have any legal jurisdiction, engagement with operators can often lead to resolution and improved compliance.

We are also hopeful that promoting the scheme to European freight networks will have a positive effect on compliance.

Engagement on this should be relatively straight forward so we will be exploring this in the short-term

**Timescale:** Short-term

## c) Administration

## Issue 12

Online portal limitations and representations submission process

### Recommendation

Many operators felt that interaction with London Councils surrounding permission application and administration processes are limited, with many indicating that the current paper based process of submitting representations is inefficient and time consuming.

London Councils will be developing a new interactive portal that will allow operators to do the following:

- Apply for permissions
- Manage and update their fleets
- Submit representations and other correspondence online
- Check outstanding PCNs

This should help improve the service that we provide operators, and speed up the process for operators engaging and complying with the scheme.

We will implement this once the new system has been introduced.

**Timescale:** Short-term

## Issue 13

Permission rules, conditions of use and duration

### Recommendation

Through the engagement process with operators during the review, it was felt that the current set of permission rules and the three year validity of the permission are unnecessary.

London Councils will review the current permission rules to ascertain whether they are fit for purpose. Whilst assessing this, London Councils will examine whether some of the permission conditions currently not enforced should be or whether they should be removed from the conditions altogether. Consideration will also be given to the scope of adding further conditions to the scheme.

With respect to the three year permission renewal process, London Councils will be recommending that this is increased to five years. This should lessen the administrative burden for all parties and reduce the instances of PCNs being issued when operators forget to renew vehicle details on the permissions database.

**Timescale:** Short-term

## Issue 14

Bureaucratic and unnecessary EF119 process (pre-PCN enquiry letters)

### Recommendation

Freight operators felt that they often had to engage with the EF119 process, even when the vehicle was undertaking a regular journey on an approved route. Which they find unnecessary and time consuming.

The EF119 process was introduced to avoid sending out unnecessary PCNs for vehicles with a permission that had been observed in an area where the activity was not known.

London Councils will be creating an electronic, automatic EF119 process, together with an automated white list that is linked to the database, flagging vehicles on approved routes electronically. Whilst we may check on journeys periodically to establish whether a vehicle is in breach of the terms and conditions of the scheme. This updated process should significantly reduce the incidents of repeated EF119s.

We are proposing to introduce this as part of the new case management system, and will be delivered this in the short-term.

**Timescale:** Short-term

## Issue 15

Routing guidance

### Recommendation

This has already been explored but it is worth noting as part of the administration process, that the idea of developing a real time online routing tool that is interactive and can be used in conjunction with apps and satellite navigation systems is something that we are keen to develop.

London Councils currently provide free routing advice when requested but it would be beneficial to all of those interacting with the scheme if this was made more efficient.

**Timescale:** Mid-term

## Issue 16

Representation response time

### Recommendation

Many operators felt that the response time in dealing with representations is too slow and has an impact on their administrative functions. It was also mistakenly felt that this often had an impact on their ability to pay at the reduced rate within the prescribed deadlines.

Whilst London Councils believes that any delay caused by our administration process should not have an impact on payment timeframes, we believe that more could be achieved to speed up the process.

The new case management system should assist with response times to representations and will allow us to prioritise work more efficiently. We are confident that this will reduce backlog and that it should go some way in alleviating this concern.

The implementation of the new system is imminent, so operators should see changes in the short term.

**Timescales:** Short-Term

## Issue 17.

Limited compliance data

### Recommendation

Whilst London-wide data on freight movement and activity has improved substantially over the last few years following research undertaken by TfL, knowledge and data gathering into the effects of the LLCS, including compliance is limited.

London Councils have been well supported by the freight industry and its networks whilst undertaking this review and we propose to utilise these links in the future to carry out regular surveys and reports into the effects of the scheme.

We will also be monitoring on-street activity more closely and plan to utilise CCTV and ANPR technologies deployed for enforcement purposes to help provide much needed data on freight movement and compliance of the LLCS.

We will be looking to feedback information on the scheme's performance to key stakeholders on a more regular basis.

**Timescale:** Mid-term



# Conclusion

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The recommendations outlined above were approved by London Councils' Transport and Environment Committee (TEC) on 15 June 2017. Details of this high level report can be seen on the following link: <http://www.londoncouncils.gov.uk/node/31932>

London Councils is committed to fully explore the recommendations and solutions, outlined within the stipulated timescales. The delivery of the review recommendations has started, but is in the early stages and there will be significant work and engagement with key stakeholders to help realise the ambitions of the review. London Councils will be developing plans for specific proposals and conducting further research, collating data for the purposes of future analysis where necessary, whilst continuing to utilise the effective communication channels that have been created with key stakeholders during the review process.

It is important that the residents of London can continue with their day-to-day life, without the negative impacts of freight movement and the disturbance that the transient noise it can create, therefore we will consider options on how to communicate the recommendations through wider engagement with residents and residents groups.

It is equally important for the freight industry to service the needs of Londoners. The importance of freight in creating a thriving city is often forgotten and should not be understated.

London Councils has also committed to continue to engage with the Working Group as the review continues, allowing assistance and feedback on details of any further research, projects and pilots.

The current scheme does not ban movement and deliveries during the hours of the scheme it simply aims to control them. It is hoped that this review and the recommendations which are taken forward in the future will get the balance right and provide a night time and weekend freight management scheme that is both progressive and fit for purpose.

London Councils would like to thank all of those who gave their valuable time and expertise to help carry out this review. We are especially grateful to the working and steering group members listed in this report but also to every single person who took the time to respond to our consultations and attend our engagement events.

# Appendix 1

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## GREATER LONDON COUNCIL TRAFFIC MANAGEMENT ORDER

1985 No. 343

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### **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**

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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.

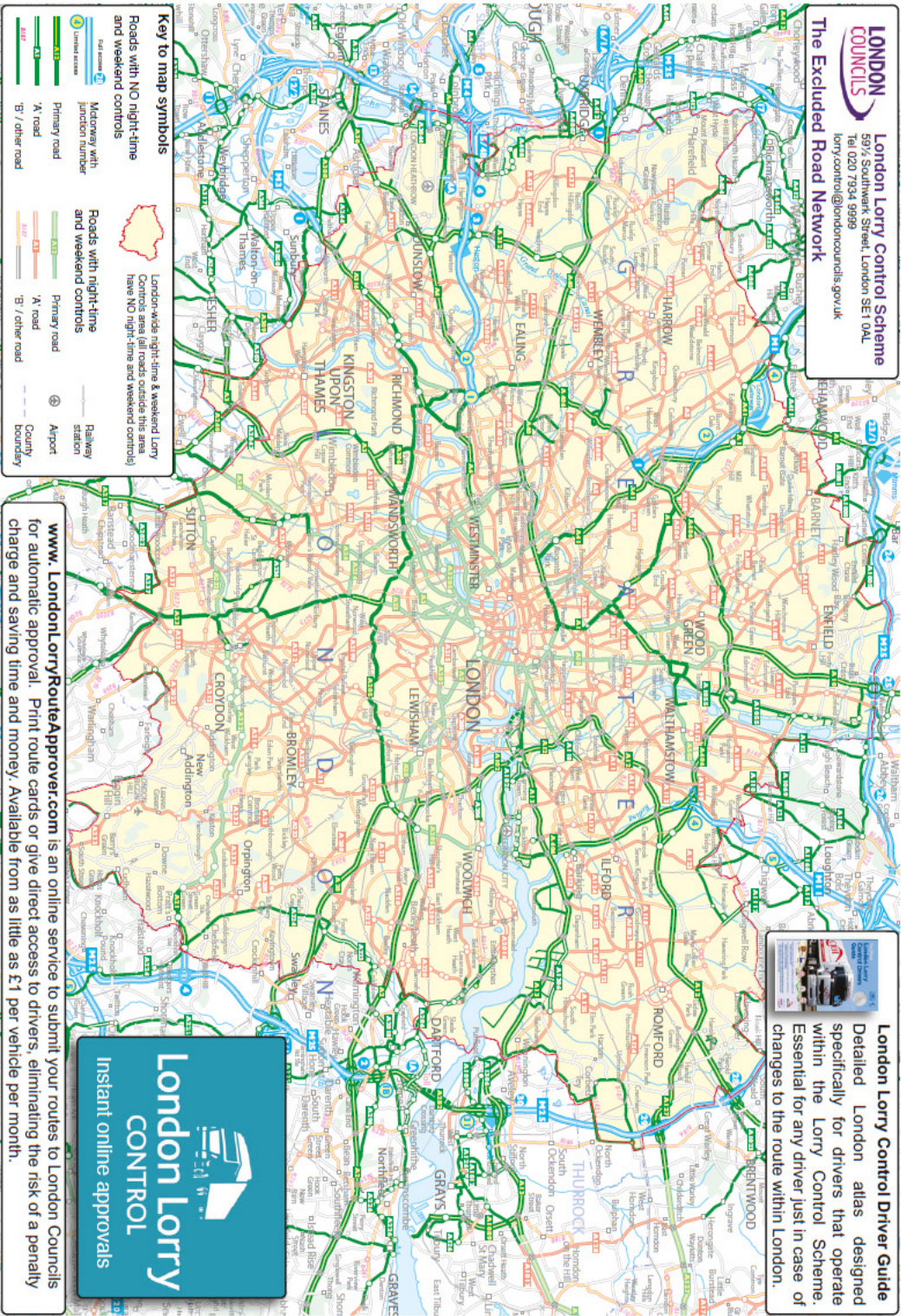
(d) any notice required to be served under the provisions of this paragraph may be served by recorded delivery service on the holder at the address shown by the holder on the application form for a permission or at the address most recently notified by the holder to the Council or at the holder's last place of business.

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



# Appendix 2

## The Excluded Route Network



# Appendix 3

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## London Lorry Control Scheme Permission Conditions

### Notes

- A. In these Conditions, unless stated otherwise, the word “applicant” shall be taken to mean both the applicant for the Permission and, if different from the applicant, the person to whom the Permission is granted and the driver of a vehicle in respect of which a Permission is granted.
- B. The Permission is valid for the areas of the London Boroughs participating in the Scheme as indicated on the current London Councils London Lorry Control Scheme map. This area is referred to as the “Permission Area”.
- C. A “restricted road” is a road to which the Traffic Order applies and an “excluded road” is a road in the Permission Area to which the Traffic Order restrictions do not apply.
- D. Failure to comply with the Conditions may result in the revocation or suspension of the Permission.
- 1. The applicant shall operate the vehicle for which the Permission is issued in compliance with the measures set out in these Conditions.
- 2. The applicant shall carry out modifications to the vehicle for which the Permission is issued so as to comply with the measures set out in the Schedule accompanying the Permission. The modifications shall be completed within the period specified in the Schedule. The applicant shall ensure that all such modifications, and any existing features fitted to the vehicle which reduces its environmental impact are kept in proper working order at all times.
- 3. The Permission is granted to the applicant for the specified vehicle and is not transferable. The Permission 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 the London Councils Lorry Control Administration section of this immediately in writing.
- 4. The applicant and the driver of the vehicle shall maximise the use of the M25 or other suitable routes outside the Permission Area as an alternative to using roads in the Permission Area. The applicant and the driver of the vehicle shall ensure that the vehicle shall not be driven on restricted roads in the Permission Area during the controlled period, unless:
  - (a) it is undertaking a necessary journey in the Permission Area and:
    - (i) the next planned stopping place is only accessible by a restricted road or roads in the Permission Area where the vehicle is to be loaded or unloaded, or repaired or parked either in a vehicle off-street parking place or on another parking place specifically designated as a commercial vehicle parking place by a Highway Authority; or
    - (ii) the previous planned stopping place was only accessible by a restricted road or roads in the Permission Area where the vehicle was loaded or unloaded or repaired or was parked either in a vehicle off-street parking place or on another parking place specifically designated as a commercial vehicle parking place by a Highway Authority; or
  - (b) the vehicle is being driven on the restricted road because of a local temporary traffic regulation order or diversion or at the direction of a police officer in uniform.
- 5. The applicant and driver of the vehicle shall ensure that, during the controlled period, if it is essential that the vehicle uses roads in the Permission Area, the vehicle minimises the use of restricted roads **unless a**

**route is specifically agreed with the London Councils Lorry Control Administration section.** To this end, the applicant and the driver of the vehicle shall ensure that the vehicle:

- (a) does not leave the excluded roads until as near as practicable to the planned stopping place in the Permission Area; and
- (b) takes the shortest practicable route from a planned stopping place either to the nearest excluded road or to the next planned stopping place if this results in the vehicle being driven a shorter distance in total on restricted roads.

**If a specific route has been agreed with the London Councils Lorry Control Administration section, the applicant and the driver shall ensure that the vehicle follows the agreed route.**

- 6. The applicant shall ensure that the driver using the vehicle in the Permission Area during the controlled period has with him a document or documents showing clearly the planned stopping places within the Permission Area. These shall be shown by the driver to any authorised officer of the Committee on request. For a period of four weeks after a vehicle journey is made the applicant must be capable of substantiating the need for a vehicle being on a restricted road at any particular time and place. Documentary evidence shall be produced on request to any authorised officer of the Committee to substantiate such a vehicle journey.
- 7. The London Councils Lorry Control Administration Section shall be notified by the applicant of any material change in operating practices specified on the application form or in any accompanying correspondence which could affect the conditions under which the Permission is granted.
- 8. To eliminate avoidable noise, and reduce avoidable environmental intrusion the applicant and driver shall, so far as is practicable, ensure that all loads and equipment carried in or on the vehicle are firmly secured (and if necessary padded) and the vehicle parts and equipment including chains, tailgates and doors are maintained in good order and properly used.
- 9. Every practical effort shall be made by the applicant and driver to minimise the noise of refrigeration equipment particularly when the vehicle is parked. Half power switching shall be used as much as possible.
- 10. By the date specified in the Schedule the applicant shall reduce the noise emission from the vehicle as specified in the Schedule.

(Note: requirements for vehicle noise emission reduction will be guided by the current EU standard from time to time).

- 11. By the date specified in the Schedule the applicant shall minimise the noise emitted by the air brake system by fitting equipment, or its equivalent, specified in the Schedule.
- 12. The applicant shall implement driver training procedures and fleet management techniques which will have the effect of achieving significant environmental improvements.

(Note: Guidance Note No.2 gives guidance on some measures that have been identified as contributing to improved performance).

- 13. The applicant and the driver of the vehicle shall co-operate in assisting any authorised officer of the Committee 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.
- 14. In the event that any Permission is revoked or suspended it is the duty of the applicant to inform the London Councils Lorry Control Administration Section of this immediately in writing.



15. An applicant shall bring to the attention of the driver of the vehicle all Conditions subject to which a permit has been issued. However, nothing in the preceding part of this Condition removes the applicant's responsibility for compliance with Conditions.

These Conditions were adopted by the London Councils, Transport and Environment Committee, formerly known as the Transport Committee for London, on 31/3/2000. They apply to all permits issued, or permissions granted as the case may be, after that date.



## Appendix 4

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### London Lorry Control Scheme Review Steering Group Terms of Reference 2016

#### Context

Transport for London (TfL) predict that London's population is set to increase by almost two million by 2031, which will equate to an additional five million road trips on top of the 26 million that already take place, with 90% of all goods movement in London taking place by road, every day. Therefore, it is essential that London maintains a healthy road network not just for the economy but for its population.

The London Lorry Control Scheme (LLCS) restricts the movement of heavy goods vehicles over 18 tonnes maximum gross weight, at night and at weekends on specific roads on London's road network. The scheme has been in place since 1985 under the Greater London (Restriction of Goods Vehicles) Traffic Order 1985, LLA & TfL Act 2003. The scheme is in place to help minimise noise pollution in residential areas during unsociable hours through restricted use of these roads.

On 10 December 2015, London Councils' Transport Environment Committee (TEC) agreed that the Freight Borough Officer Liaison Group (BOLG) would form a separate working group to discuss the implications of the LLCS and to consider any requirements for amending the scheme.

#### Purpose and Aims

The review will seek to assess the effectiveness of the scheme, including consideration of its impact on the freight industry, business and the benefits to London's residents. It will look at the management of freight, evaluate how the scheme can assist with the reduction of congestion and ensure noise pollution continues to be kept to a minimum in residential areas during unsociable hours.

It will cover routing, signage, hours of operation, extent of restrictions, enforcement, permissions and exemptions, taking account of technological advances in HGV design, as well as traffic management and planning techniques.

The review will aim to ensure that the scheme continues to provide essential environmental benefits and protection for Londoners as it has done for over 30 years and will make sure the scheme plays an integrated role with other existing and emerging freight and environmental management initiatives being led by the Mayor and Boroughs.

Other specific aims include:

- Provide a forum for discussing the impacts, benefits and possible improvements to the scheme
- To gather information and data to help inform the review and future management of the scheme
- Consider changes to current arrangements in relation to routing, signing, hours of operation, restrictions, enforcement practice, application process, weight limits, exemptions, charging, administration, publicity, communication and the Traffic Regulation Order
- Make recommendations for TEC about possible changes to the scheme and any further work that may be necessary
- Work collaboratively with a wide range of stakeholders to ensure a range of views is considered and any publicity and communications are clear and consistent

## **Steering and Working Group**

A Steering Group will be in place to provide a strategic overview of the aims of the review, setting out timescales, reporting structure and strategy. Alongside the Steering Group, the operational detail will be carried out by a wider Working Group, with both groups having representation from borough and TfL officers.

## **Membership**

The Steering Group and Working Group will be chaired by London Councils and include relevant GLA, borough and TfL officers.

The Working Group will also include representation from a range of transport user groups, small business groups and road user/resident groups. The final membership of the Working Group will be agreed by the Steering Group.

Members will be expected to commit to and act as ambassadors and expert representatives of their authority or sector, actively contributing to the achievement of the group's aims within meetings and in their daily roles.

## **Meetings**

The Steering Group is expected to meet bi-monthly. The first meeting will be held in October 2016.

The Working Group is expected to meet monthly. The first meeting will be held in December 2016.

Meetings will take place at the London Councils offices at 59½ Southwark Street, London SE1 0AL.

Meetings will last no more than 2.5 hours.

## **Governance and Reporting**

Updates and progress reports will be presented to London Councils TEC, the London Freight Borough Officer Liaison group and any other relevant governing bodies within the timescales as set out by each organisation.

## **Resources and Support**

London Councils TEC has agreed a budget of £50,000 in 2016/17 to support the review and an equal sum is proposed for 2017/18.

# Appendix 5

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## Operator Survey Questions

- How many vehicles over 18 tonnes maximum gross weight (MGW) do you have?
- Which of the following best describes how frequently you carry out deliveries/collections with vehicles over 18 tonnes (MGW) in London at any time of the day or night?
  - Daily
  - Weekly
  - Monthly
  - Other
- How would you rate your understanding of the following aspects of the London Lorry Control Scheme?
  - The process for applying for permission
  - The Excluded Route Network,
  - The restricted roads,
  - The hours of control,
  - Permission conditions,
  - Exemptions,
  - The purpose of the scheme
- How many London Lorry Control Penalty Charge Notices (PCNs) have you/your business received during the last 12 months?
  - 0
  - 1-10
  - 11-20
  - 21+
- Has the scheme ever discouraged you from carrying out deliveries/collections during the controlled hours? (Yes, No)
- In what ways has the scheme discouraged you? Tick all that apply
  - I thought the scheme meant all vehicles over 18T (MGW) were banned completely during controlled times
  - I want to avoid receiving a PCN
  - The rules of the scheme are too confusing so I avoid it altogether.
  - The extra journey time for using a compliant route is excessive.
  - The extra mileage and cost of using a compliant route is unaffordable.
- Which aspect(s) of the scheme are of most concern to you/your organisation? Tick all that apply
  - Duration of permission (currently three years)
  - The permission application process
  - Hours of control
  - Extent of restricted roads
  - The 18T (MGW) limit
  - The quality of road signage
  - The method of enforcement
  - The penalty charge notice administration process,
  - I don't have any concerns about the scheme

- Which best describes the nature of the organisations or businesses that you deliver to/collect from?
  - Retail,
  - Hospitality
  - Construction
  - Manufacturing
  - Logistics/distribution
  - Office and professional services
  - Other (please specify)
- Would you be interested in attending an Operators' Workshop to discuss your concerns? (Yes, No)

# Appendix 6

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## Borough Survey Questions

- Which borough do you represent?
- How aware are your residents of the London Lorry Control Scheme?
  - Very aware
  - Somewhat aware
  - Not very aware
  - Don't know
- Have you received any noise complaints in your borough relating to HGVs during the hours of control in the last 12 months?
  - Yes
  - No
  - Don't know
- How many complaints have you received in the last 12 months?
  - 0-5
  - 6-10
  - 11-15
  - 16-20
  - 20+
- Are there any roads within your jurisdiction that you want to be re-assessed for inclusion or removal from the Excluded Route Network (ERN)? (Yes, No)

Please specify the route(s) that need to be reviewed and reason for them to be included/removed from the ERN.

- Do you believe that there should be a review of the scheme's road signage?
  - Yes, a pan-London review carried out by London Councils
  - Yes, a review carried out by borough officers on a borough by borough basis
  - Yes, a review carried out at a sub-regional level
  - No, the signage does not need to be reviewed
- Are there any aspects of the London Lorry Control Scheme that could be changed to better suit the needs of your authority while still considering the impact on your local residents and businesses? (Yes, No)
- Which of the following aspects of the London Lorry Control Scheme could be changed?
  - Hours of control
  - Permission conditions
  - Vehicle exemptions
  - Weight limit
  - Enforcement practice

Please briefly explain why and how?

- How can London Councils best facilitate communications with your residents about potential changes to the scheme?
  - Via borough website
  - Via local media
  - Via local meetings
- Does your borough retain a detailed inventory of the location and condition of London Lorry Control Scheme signs on your network? (Yes, No)
- Would you consider sharing access to any of your existing CCTV cameras for the purposes of enforcing the London Lorry Control Scheme? (Yes, No)
- Would you consider allowing London Councils, via a third party, to install CCTV/ANPR cameras on your network? (Yes, No)

# Glossary of Terms

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ANPR	Automatic Number Plate Recognition
CCTV	Closed Circuit Television
CLOCS	Construction Logistics and Community Safety
CoL	City of London
DVLA	Driver and Vehicle Licensing Agency
DVS	Direct Vision Standard
EF119	Enquiry Letter
EFV	Electric Freight Vehicles
EO	Enforcement Officer
ERN	Excluded Route Network
FAQs	Frequently Asked Questions
FORS	Fleet Operator Recognition Scheme
FSB	Federation Of Small Businesses
FTA	Freight Transport Association
GLC	Greater London Council
HGV	Heavy Goods Vehicle
LB	London Borough
LEZ	Low Emission Zone
LLA & TfL Act	London Local Authorities and Transport for London Act
LLCS	London Lorry Control Scheme
MGW	Maximum Gross Weight
PCN	Penalty Charge Notice
RHA	Road Haulage Association
SLS	Safer Lorry Scheme
TEC	Transport and Environment Committee
TfL	Transport for London
TMO	Traffic Management Order
TRL	Transport Research Laboratory

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