

## **London Lorry Control Scheme (LLCS) Review – FTA Position**

FTA was pleased to see a full review of the London Lorry Control Scheme (LLCS) announced in December 2016. With the scheme being set up more than 30 years before, we wanted to see fundamental reform of the scheme to reflect the very different way London operates to way it did in 1985.

However, we have been frustrated by the lack of progress by London Councils, despite the Mayor's Transport Strategy highlighting the need for substantial changes and cross-party support from the London Assembly's Transport Committee.

Whilst the scheme does not technically ban HGVs from using the capital's roads at night and at weekends, the complexity of the LLCS, along with the often lengthy detours required and hefty fines if you get it wrong (£550 for the operator and £130 for the driver), means that many simply avoid London's roads during the operational hours of the scheme. This leads to a greater concentration of traffic during the day and, in particular, in the morning peak.

The LLCS is also a blanket restriction on HGVs over 18 tonnes. This has nothing to do with how noisy or quiet they may be, it is because goods vehicles over 18 tonnes operate on at least three axles making enforcement easier.

Key areas for our members are:

**Operational hours** – the current hours of operation (Monday - Friday: 9pm - 7am; Weekends: from 1pm Saturday until 7am Monday morning) push large vehicles on to the roads just at the time the morning peak of commuters, including cyclists and pedestrians, begins. FTA wants to see the hours changed to allow for large vehicles, to enter London to make their deliveries and be able to leave before the morning peak starts. Ideally, we would want to see access from 5:00am to allow time for deliveries to be made and vehicles to leave delivery destinations.

The amount of access in the evenings and at weekends is also something we would want to see increased to recognise 21<sup>st</sup> century lifestyles and acknowledge that London is a 24/7 city, open for business 7 days a week. Since the introduction of Sunday Trading Laws in 1994, individuals expect to make purchases throughout the weekend. Being able to supply local businesses throughout the weekend, will ensure customers can find the goods in their local shops, without the need to travel further distances to obtain the items they require.

**Review of the restricted roads** – Under the LLCS, the capital's roads are divided up into two categories: 'restricted roads' and the 'Exempt Route Network (ERN)'. All of central London's roads are restricted and the ERN is determined by the proximity of residential properties to the route rather than whether a road looks or feels like an appropriate route for HGVs. If an operator wishes to use any of the restricted roads, they must have a permit and during the controlled hours of the scheme, goods vehicles with permission must travel along the ERN to the closest point of their destination. The journey must be completed by using the shortest distance along restricted roads. This often leads to significant detours and the extra mileage leads to additional fuel consumption, driving time, cost and emissions.

**Exemptions for quieter vehicles** – modern vehicles are significantly quieter today than they were in the 1980s. In addition, gas powered vehicles are especially quiet, and well suited to urban environments. However, there are considerable costs for operators moving to gas powered fleets. Exemptions for these types of vehicles would help build the business case and encourage operators to move to these vehicles for city deliveries.

**Larger vehicles help reduce vehicle movements** – big is not always bad; moreover, ensuring the right size vehicle is used on the right roads at the right time is more important. Removing and reducing restrictions on large vehicles where possible will mean that fewer vehicles will be on the roads and reducing emissions, and will help to improve congestion and air quality.

**Streamline administration of the scheme** – the LLCS is still operated using physical observations and there is confusion about exactly what paperwork is required as evidence for making legitimate deliveries to premises on the excluded road network. Too much of the system is geared towards controlling lorries rather than enabling them to comply with the objectives of the scheme to reduce noise nuisance to residents.

We believe that significant changes to the LLCS, in particular rolling back the operational hours to finish earlier in the morning will enable more deliveries to take place pre-7am reducing the number of HGVs on the capital's roads when there are large volumes of vulnerable road users sharing the same space, and this would lead to safer and more liveable roads.