

## Appendix 1 - Freight and Servicing SPD Consultation Report

### List of Respondents

Comment Ref.	Organisation	Name
1	Cambridge Heath and London Fields Rail Users	Ray King
2	Resident	Richard Latto
3	Resident	Gerald Hine
4	Environment Agency	Scott Hawkins
5	Historic England	Richard Parish
6	Resident	David Coleman
7	Port of London Authority	Michael Atkins
8	City of London – DBE Major Projects [Internal]	Leah Coburn
9	Resident	Jane Northcote
10	Barbican Association	Helen Kay
11	Freight Traffic Control 2050 project academic team	Professor Tom Cherrett et al
12	GLA & TfL	Juliemma McLoughlin
13	City Access Advisor	Lydia Morley
14	Cross River Partnership (CRP)	Susannah Wilkes
15	City Property Association	Charles Begley
16	Road Haulage Association	Chrys Rampley

For brevity, longer responses have been summarised in this document. Full responses are available on request.

Ref	Comment (Summarised comments indicated with *)	City Corporation Response
1.1	The City of London should encourage moves to get more freight carried by rail. Although rail cannot deliver to final destinations in the City, there are several terminus stations in the City and even more close by.	Noted
1.2	Measures to encourage use of freight deliveries to those terminus stations would help to reduce overall road traffic. Rail franchisees should be encouraged to carry freight in passenger trains.	Noted
1.3	In the City itself, many deliveries are small packages which could easily be delivered by cycle (including from rail stations). Many European cities allow cycling contra-flow along one-way streets. This would make life easier for cycle couriers and cycle commuters.	The City encourages cycle freight, already permits contraflow cycling on most one way streets.
1.4	The network of bus routes in the City is extensive and buses could also be used to deliver packages to the majority of addresses in the City.	This is acknowledged, although the carrying capacity of an individual on a public bus is unlikely to be competitive for most deliveries.
1.5	The City should aim to reduce car traffic (currently 26% of total traffic) to nil. There are plenty of public transport and taxi alternatives for both able-bodied and mobility-impaired pedestrians in the City. This would reduce pollution levels and create a more pleasant environment for cyclists and pedestrians.	The elimination of car traffic is beyond the scope of this SPD.  The City Corporation intends to produce a long term transport strategy in the next two years where policies of traffic reduction will be considered in detail.
1.6	More of the City's narrow streets should be restricted to cycle and pedestrian use only.	Noted. This is beyond the scope of the SPD, but policies on managing the use of City streets will be considered in the forthcoming transport strategy.
1.7	Light goods vehicles (currently 18% of total traffic) should be encouraged by physical and fiscal measures to operate as electric vehicles (non-polluting at the point of use). An early date should be fixed to ban petrol and diesel-engined light goods vehicles from the City.	Noted. The SPD encourages the use of low and zero emission vehicles through procurement, and electric vehicle charging points installed in loading bays and car parks should be suitable for commercial electric

		<p>vehicles (para 73).</p> <p>Banning petrol/diesel LGVs is beyond the scope of the SPD, but policies on managing the use of City streets will be considered in the forthcoming transport strategy.</p>
2.1	<p>Waste disposal in Cloth Fair, where I live, is not satisfactory. Domestic collection is fine and the electric vehicles are excellent. The only problem is that transient residents are often not aware of the system, leaving rubbish out at odd times and in the wrong bags.</p>	<p>This comment has been passed to the Cleansing team.</p>
2.2	<p>However commercial collection is more problematic. There are something eight different vehicles collecting the rubbish each. (Several Long Lane and West Smithfield establishments have their rubbish collected via Cloth Fair.) Because they are competing on price, they often use large old polluting diesel vehicles to collect wheelie bins. They arrive at all times of day - sometimes in the middle of the night and their collection technique, obviously under time pressure, is messy and noisy. To save time they sometimes reverse the wrong way down the one way straight. The noise and pollution are particularly bad in the narrow parts of the street making it impossible to leave windows open.</p>	<p>This comment has been passed to Environmental Health.</p>
3.1	<p>There is scant mention about freight in respect of City residents. Many more deliveries are being made to home addresses, especially in respect of online food shopping. This is likely to grow exponentially as the number of residential properties increases in the Square Mile. This emphasises the need for such deliveries to be by electric vehicles, and it is noticeable that such deliveries are often now made in electric vehicles, and are largely ahead of deliveries to heavy industrial commercial concerns.</p>	<p>Noted</p>
3.2	<p>There needs to be a dramatic decrease in building development. Over the last decade this sector has increased markedly, and most construction lorries are large, noisy and air polluting. This must be addressed urgently, but unfortunately the next decade seems to be likely more and more of the same.</p>	<p>Noted.</p> <p>The City of London is the world's leading international business centre, and is constantly evolving to ensure that there is sufficient and high quality building stock for current and future business needs.</p>

		Construction Logistics Plans are required for all major development in the City, requiring construction sites to minimise the impact of works on residents and businesses. The City of London Air Quality Strategy sets out the City Corporation's position on minimising the impact of construction work on pollution.
3.3	Because so many deliveries to private residents are directly personal, I would be against central holding areas. As many of these are via Royal Mail, would it not be against their regulations that post should normally be delivered direct to the addressee's door?	Para 92 of the SPD refers to central delivery points – this is intended to be for parcel deliveries with the aim of avoiding failed deliveries if the recipient is not at home. Re-worded to clarify this.
3.4	There needs to be greater development towards miniaturisation of electric vehicle batteries, which are both capable of saving vehicle space, and providing longer distances between charging. This has been done in other sectors such as mobile telephony: I see no reason not to believe that it will come about with vehicular traffic.	Noted. This is beyond the scope of the SPD, but the City Corporation encourages the development of technology that will facilitate cleaner, more efficient freight.
4.1	**We have reviewed the SPD and support the aim of the SPD to reduce the amount of freight movement within the City and the encouragement to use low emission vehicles to improve air quality.	Noted.
4.2	The SPD should acknowledge the potential impacts that increased boat movement in the River Thames may have on biodiversity and on the flood defences.	Para 66 updated to require operators to work with the EA and PLA to minimise biodiversity and flood defence impacts.
5.1	**We have reviewed these documents against the National Planning Policy Framework (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.	Noted
5.2	**Historic England responded to the SEA Scoping consultation on 1st June 2017, considering the document to be thorough and supporting the inclusion of cultural heritage within the SEA. We note the conclusion that the selected option will have minor positive uncertain effects on the	Comments are noted.  Monitoring of the impacts will primarily be done through the Delivery and Servicing Plan

	<p>historic environment.</p> <p>We would consider the measures set out in the proposed SPD are most likely to have environmental benefits through the reduction the movement of freight and services and associated road traffic. Whilst it is hard to quantify or predict the likely impacts on heritage assets measures which reduce unnecessary travel and pollution are most likely to be beneficial. Additionally the impacts of development on the historic environment will be assessed and controlled through the large number of Local Plan policies that protect the historic environment. As such we do not consider it necessary to comment in detail. We would however encourage the City to consider how the impacts of changes to routes and volumes of freight and servicing can be monitored.</p>	<p>requirements, but it is acknowledged that attributing network-wide changes (eg a drop in traffic volumes on a particular street) to a particular intervention will be difficult. As the SPD applies to new developments, the DSP monitoring must show that the impact of the development on the transport network is within the tolerances of the planning consent.</p>
5.3	<p>Finally, it must be noted that this advice is based on the information provided by you and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently relate to this or later versions of the Guidance, Appraisals and Management Plans, and which may have adverse effects on the environment.</p>	<p>Noted.</p>
6.1	<p>I support the strategy. Deliveries and other servicing are having an increasing impact on the City environment.</p>	<p>Noted</p>
6.2	<p>The potential conflict between the interests of businesses and residents, especially in relation to night-time and early morning noise, is well acknowledged.</p>	<p>Noted. The SPD aims to strike an appropriate balance between maintaining residential amenity, and allowing deliveries at off peak times in some locations.</p>
6.3	<p>In particular, I support paragraphs 70-72 and 99 which recognise that simply asking businesses to commit to quiet operation outside normal working hours is not enough. Securing a quiet environment is 20% policy; 80% operational management. Promoting ambitious DSPs, encouraging, cajoling and ultimately enforcing agreements is an essential role for the City.</p>	<p>Noted. The enforcement of the Delivery and Servicing Plans will be a fundamental part of improving freight and servicing in the City.</p>
6.4	<p>I am very glad to see a specific reference to waste bottle collections (87). It is staggering how audible they are across the City.</p>	<p>Noted.</p>

6.5	I would like to have seen mention of talking vehicles ("this vehicle is turning left" repeated endlessly while it waits in a queue). They are growing in popularity (including among the City's own fleet) and having an increasingly negative noise impact on the City environment. Is there hard evidence that they reduce accidents? With a possible exception for bin lorries, I would like to see them banned.	Turning alarms on larger vehicles are increasingly a requirement to reduce danger for pedestrians and cyclists, to whom left-turning vehicles present a significant danger. Excessive noise from vehicle alarms associated with particular premises can be reported to the City Corporation's Pollution Control Team for investigation.
6.6	At a strategic level, I would like to see more ambition in the approach to consolidation (64). If last mile delivery on foot cannot be made to work in the City, where could it? Do we not have a sector specific consolidation centre in Smithfield with all the infrastructure needed? The introduction of electric hand carts to the City streets would also have an excellent traffic calming effect.	The SPD is a guidance document which cannot introduce a requirement of consolidation within the current policy framework, but aims to encourage new developments to reduce the impact of freight movement on the transport network, air quality and noise. The use of hand carts would be one way in which this could take place.
7.1	**The PLA is the Statutory Harbour Authority for the Tidal Thames between Teddington and the Thames Estuary. The PLAs functions also include for promotion of the use of the river as an important strategic transport corridor to London.	Noted.
7.2	Generally, the PLA support the aims of the SPD, particularly the aspiration to encourage the use of low emission river transport for goods and services, this aligns with the Thames Vision document, which encourages the uptake of new and green technologies to reduce the environmental impact of river transport.	Noted
7.3	The PLA also supports the encouragement of waste management companies to make use of the safeguarded Walbrook Wharf, to increase the amount of waterborne freight/materials to/from this site. However we believe that this should go further, and that the increased use of Walbrook Wharf for more than just transporting waste should also be strongly encouraged. The PLA would welcome a discussion on the capacity of Walbrook Wharf, and any opportunities to increase capacity here, for a	Updated para 66 to reference other logistics uses.

	wider range of freight/materials. This is supported by the PLAs Thames Vision document, which aims to see more goods and materials routinely moved between wharves on the river, taking over 400,000 lorry trips off the regions roads by 2035.	
7.4	The PLA would also like to work with the City of London to understand what uses might be possible with a re-instated Swan Lane Pier, which is supported in the City of London's Thames Strategy SPD to be reinstated for passenger or freight use.	This offer is welcomed, and has been passed to the City Surveyor(????) to take forward.
8.1	Background – para 2: note the new economic document for the city on the intranet. Some of these figures might need to be revised.	This data comes from GLA, rather than City Economic Development Office
8.2	Page 12 – para 44 – isn't the RDR plan being revised this year?	The RDR plan is being revised in 2018. Added text to reflect this.
8.3	Page 12 – para 45 – minor typo 'sets out'.	Corrected
8.4	Page 15 – para 60 – should this read for new developments? This would not affect a large % of deliveries into the City over say a 5 year period (i.e new development must only contribute a small % overall).	The SPD will affect new development and alterations to existing buildings that require planning consent.
8.5	Page 15 – para 64 – Is it worth setting taretts for consolidation – ie reduce to 10% of deliveries pre consolidation?	The SPD aims to retain flexibility in the approaches for managing deliveries. Consolidation is likely to be a part of this for some sites, but may not be suitable for all development, so a target may not be appropriate.
8.6	Page 15 – para 66 – can this be enforced by planning condition for new developments? It would be good to see as part of this, or other Strategic work, an understanding of actual vehicle numbers generated by offices and hotels. Often in planning applications this is based on that Trips? Database which I don't believe is particularly accurate.	Data collection on trips generated by particular sites is not always robust, but improved monitoring and enforcement of DSPs through this SPD will improve understanding of typical trip generation.
9.1	I am a resident of the City of London and recognise the problems you list at the beginning of this document. I am very glad to see progress towards addressing congestion, pollution, and road traffic danger, and all measures to declutter the streets are welcome. Many of the City's roads are narrow, and we share the space. This document is an admirable basis	Noted

	<p>by which to manage this difficult problem.</p> <p>The Vision and Aims are laudable, and I'm glad that the City aspires to reduce the number of freight and delivery vehicles.</p>	
9.2	<p>It is disappointing, however, that the vision and aims are described in purely relative terms. By 'relative terms' I mean that they are stated in terms of "reduce" or "minimise". There are no clear objectives, and no measurements are specified in the document. A business in the City could assert that they <i>already</i> "minimise" freight and delivery trips: they can then safely ignore the rest of the document.</p> <p>I would like to see the Vision expressed in measurable terms. If it is a Vision, it should be truly ambitious and visionary. For example a Vision could be that, ultimately, there will be <i>no</i> polluting delivery vehicles in the City of London during the day. This is a real vision which would motivate businesses to take action.</p> <p>For Aims, I would be interested to see some measurable objectives. As stated in the document, the aims are described in terms like "maximise", "minimise" and "reduce". (56, 57, 58) It is not possible to measure whether these aims have been achieved or not. Could we have some measurable aims? How many motorised delivery vehicles are there per day now? How many do we want to see in 1 year's time? What proportion of these are non-polluting?</p>	<p>The SPD is a planning guidance document that supports the City's Local Plan. The document aims to guide developers to make planning applications that are acceptable to the City, but does not apply to buildings that are not going through the planning process.</p> <p>The City Corporation will be producing a Transport Strategy which is likely to set out clearer objectives and aims in the way described.</p>
9.3	<p>The useful and important policies described (62,64,67 and others) are all in terms of "to be encouraged" or "should be considered". It is easy for businesses to ignore these encouragements, given the greater demands placed on them by their shareholders and regulators. I would feel more optimistic about this document if there was a greater level of compulsion.</p>	<p>The SPD's status as a guidance document means that it provides more detail on existing policies in the City's Local Plan. The Local Plan is currently under revision, and will consider policies on freight and servicing.</p>
9.4	<p>In particular I would like to see the use of Direct Vision vehicles (74) made compulsory, for the safety of pedestrians and cyclists.</p> <p>The statement on "micro-consolidation" (64) should be more ambitious</p>	<p>While the City Corporation can encourage the use of vehicles that adhere to the Direct Vision standard, it is not possible to compel</p>

	<p>and have a greater element of compulsion. It currently says:  <i>"A system of 'micro-consolidation' within the City which enables the use of last mile deliveries by foot, cycle or zero emission van could be considered."</i> The City can have more ambition than that. It's only a square mile, so surely we can have a policy to mandate the use of electric handcarts, or bicycles, for the many small packages that are currently carried by van. This would also lead suppliers to reduce packaging.</p>	<p>organisations to use these vehicles.</p> <p>The SPD must consider all types of building in the City, and while micro-consolidation is likely to be part of the solution for some businesses, it may not be suitable for all deliveries.</p>
9.5	<p>No mention is made in the document of the use of smart technology to help suppliers and businesses make good use of public streets. Using GPS, digital mapping and data, in the future it might be possible for the City to notify suppliers about current roadworks and blocked streets, and even about congested streets and recommended routes. This would prevent delivery vehicles circulating looking for parking spaces.</p> <p>It might also be worth the City collaborating more closely with the suppliers of drivers' maps (GoogleMaps, TomTom etc) so as to enable drivers to get to the correct destination by the shortest possible route. I know that there is currently a problem because Tesco delivery drivers phone me, frustrated by unexpected route closures. Further use of smart technology could guide suppliers to make efficient use of parking spaces, make use of empty space in other vehicles, co-ordinate with last-mile delivery systems of bikes and hand-carts, and only enter the City when the route to their destination is clear.</p>	<p>Text added to para 72 on use of intelligent route planning.</p>
9.6	<p>Number plate recognition systems could also be used by enforcement officers in the City to verify if businesses are adhering to their commitments.</p>	<p>The monitoring techniques for DSPs will be based on the individual site. ANPR technology may form part of this.</p>
9.7	<p>A common nuisance is delivery vehicles parking on footways or using footways for temporary storage of their deliveries. This routinely occurs outside Tesco on Aldersgate, for example. This is addressed tangentially in the document (35, reference to Policy DM 16.5 Parking and servicing standards). Clearly it is very difficult for suppliers to conform to those standards. Smart technology might help - to guide them to available spaces. Other measures are evidently also needed, including</p>	<p>A ban on pavement parking exists throughout London. In the City, pavement parking can be reported via the Parking Helpline. Other Highway obstructions can be reported via the Contact Centre.</p> <p>A City-wide review of parking will form part of</p>

	enforcement (99).	the forthcoming transport strategy.
9.8	<p>The delivery vehicle problem is exacerbated by roadworks and construction works. These important and necessary developments often take up huge amounts of roadway which they don't always use efficiently. For example currently in Aldersgate chunks of empty roadway are condoned off.</p> <p>So perhaps a feature of strategic transportation would be collaboration between construction works and road works and delivery vehicles, so that the areas of road and footway appropriated by construction workers could be used by others, especially during non-working hours.</p>	<p>Street works carried out by the City Corporation, utility companies and developers aim to cause as little disruption as possible to the street network. It may not always be immediately clear why parts of the carriageway are cordoned off, but the City employs inspectors whose job it is to inspect the works to ensure that sites are safe, works are to time and meet permit conditions.</p>
9.9	<p>No consideration was given in the document to the prospect of using the railways for freight, including Crossrail and the underground railways.</p> <p>For example:</p> <ul style="list-style-type: none"> <li>- Tube trains are often partially empty off peak hours and at night. Could this spare capacity be used for freight?</li> <li>- Crossrail will likewise have spare capacity off peak</li> <li>- there are other underground railways in London, and unused stations. The postal railway has been opened up as a tourist attraction. Would it be possible to use this and other underground rail links, currently used and unused, for shifting freight.</li> <li>- overground railways can also be used to bring freight into London, and also, potentially to remove waste, building materials, packaging, and other items.</li> </ul>	<p>Text added to para 73 to refer to rail.</p>
10.1	<p>Comments in italics from the Barbican Association to some points in the document:-</p> <p>65. Agreements to prohibit personal deliveries to workplaces, especially those associated with online shopping, are strongly encouraged.</p> <p><i>And 79. Mentions prohibition but how will this be monitored in so many work places? And 76. States that monitoring will usually take place through the DSP. Is this enough? What exactly is being prohibited? We suggest a reference to an active policy of promoting click and collect hubs. One</i></p>	<p>A DSP forms part of the planning consent, so building managers are obliged to comply with the monitoring requirements.</p> <p>Prohibition of personal deliveries to work is one tool that may be employed to reduce vehicle movements associated with a development, but occupiers cannot be compelled to do this. The City Corporation is promoting a Click and Collect website to</p>

	<i>Canada Square reportedly received 450 a day back in 2015 likely to be many more now and other companies are offering workplace deliveries as a perk so strong statements are required to bring about change. Val Shawcross at TfL recently announced plans to ban the practice.</i>	encourage people to have personal deliveries sent to collection hubs near their home, rather than to work.
10.2	<p>70. Unless there are restrictions regarding noise or other considerations at the premises, evening, night time or weekend delivery and servicing should be the default outside residential areas.</p> <p><i>Suggest adding - Restrictions need to be in place in the buffer streets around the densely residential Barbican Estate. We suggest these streets are named to make it clear. Silk Street, Moor Lane, Moorfields, Fore Street, Wood Street (west), Aldersgate Street, corner where Silk Street, Chiswell Street, and Whitecross Street meet.</i></p>	The Barbican, Golden Lane and surrounding streets are defined as residential areas in the Local Plan (Figure X) and would therefore overnight servicing is unlikely to be appropriate in these areas, with the focus of DSPs on reducing and re-moding deliveries as appropriate.
10.3	<p>72. The London Lorry Control Scheme controls the movement of larger goods vehicles taking place at night and at weekends. A similar approach <u>may be suitable</u> for route planning of smaller goods vehicles to reduce the noise impact on residential amenity.</p> <p><i>'May be suitable' is this language strong enough to protect residential amenity? Suggest replacing with 'should be devised'.</i></p>	<p>Para 72 text updated</p> <p>The LLCS has some advantages in routeing away from residential areas, but is not necessarily the best approach for reducing noise.</p>
10.4	<p>75. 'The promotion of a no idling policy is encouraged'.</p> <p><i>This needs to be strengthened. Idling engines are a City byelaw offence, punishable by fixed penalty notice.[see also 87] and we suggest that 'is encouraged' be replaced by 'is enforced' and reference made to the punishable offence. All that work on the switching off/clean air initiative showed that there are very few cases when engines need to be left on (refrigeration), idling is not necessary for charging of phones and i-Pads which is the frequent excuse from drivers.</i></p>	Para 75 text updated to strengthen wording.
10.5	87. Particular care should be taken with regard to more noisy deliveries/servicing e.g. waste bottle collections, to avoid disturbance to	Para 93 text updated to refer to quiet servicing.

	<p>nearby residents. DSPs should employ quiet delivery agreements to reduce noise and disturbance on-street. Engines should be turned off unless absolutely necessary for deliveries to reduce noise and air pollution.</p> <p>93. Where servicing of a building is carried out by a management agent, a commitment to carry out routine servicing out of hours where possible is encouraged and consolidation of any required deliveries is encouraged.</p> <p><i>Please add that "out of hours" should not include night time, early mornings, late evenings, or weekends in residential areas in order to protect residential amenity.</i></p>	
10.6	<p><i>Please add a section on "the final few metres" of any delivery. Much really irritating noise (to residents, office workers, pedestrians) comes from hand pushed carts carrying materials from lorries to buildings along walkways and pavements even in the early hours of the morning, which are of noisy metal construction and with ill fitting wheels.</i></p> <p><i>An insistence on high quality trolleys with pneumatic rubber tyres and quiet construction materials would help reduce the noise at the last leg of the delivery.</i></p>	<p>A key part of any quiet delivery agreement will include the 'last metre' transfer from vehicle to building and may include a requirement for quiet trolleys or similar. Adherence to the quiet delivery agreement would form part of a DSP.</p>
11.1	<p><b>**</b>The Freight Traffic Control Programme is an Engineering and Physical Sciences Research Council (EPSRC) funded project investigating the impacts of freight journeys, and evaluate methods to improve efficiencies in the freight sector.</p>	<p>Noted.</p>
11.2	<p>Whilst we support the points made in the Consultation Draft, it would have more impact going forward if the requirements were made more stringent, so that rather than offering guidance and recommendations which are 'strongly encouraged', 'should be considered' etc. these were made compulsory with monitoring and enforcement. Without a greater degree of compulsion, the longer term impact of the document on the sustainability of freight and servicing operations in the City of London remains uncertain, with companies that wish to ignore the recommendations being free to do so in most cases (unless subject to a</p>	<p>Noted. The SPD, as a guidance document cannot introduce policies to compel particular delivery and servicing activities, but can direct developers to provide acceptable DSPs, which should contain commitments to reduce and mitigate the impact of freight on the transport network, air quality and road danger.</p>

	<p>compulsory Delivery and Servicing Plan (DSP) or Construction Logistics Plan (CLP).</p>	
<p>11.3</p>	<p><b>**Research into the parcel sector shows that walking is an intrinsic part of the job of delivery personnel, with drivers spending more time walking than driving, and walking on average 5 miles per vehicle journey.</b></p> <p>Our research suggests that new methods of delivery, including revised vehicle routeing, portering (ie a third party delivering goods on foot) micro-consolidation and mobile depots could all reduce the impact of freight on the City, but would require the City Corporation to facilitate by providing infrastructure or space on-street.</p> <p>A key area requiring attention is the role of land use in encouraging efficient freight transport. This may include safeguarding land for logistics, providing appropriate infrastructure on the road and kerbside, and improving trip generation capabilities to assess future impacts.</p> <p>Consolidation can ensure that the same quantity of goods and services are provided but with less freight activity. Different types of consolidation can suit different needs.</p> <p>Freight transport operators can collaborate to consolidate last-mile despatch in urban areas. It should be noted that much consolidation of goods already takes place in many sectors.</p> <p>Factors affecting intensification of freight activity in London include:  A reduction in storage space in office and retail development as a result of rising land values.  Under-pricing of delivery services as a means of gaining market share.  Customer demand for fast response times.  Lack of availability of land for logistics, especially in central and inner London.</p>	<p>A City-wide review of parking will form part of the forthcoming transport strategy. This will include looking at all street uses including the potential for servicing space on street.</p> <p>Separate workstreams looking at the potential for City-led micro-consolidation are ongoing.</p>

	<p>The Corporation should take urgent steps to investigate these sources of freight transport intensification that threaten to undo good work carried out to improve freight sustainability, and then take appropriate action to limit their impact and growth.</p> <p>Many of the ideas outlined above will require engagement with a wider range of freight partners than those businesses receiving goods and services. These include freight transport operators, service providers, shippers, and retailers.</p> <p>There is also an important role that the Corporation can take in advising and educating those working and living in the City of London about the impact of the freight transport and delivery decisions that they take when ordering and purchasing goods and services, and promoting changes in these people's behaviour in order to reduce freight transport intensity and its undesirable impacts.</p> <p>It is also important that the Corporation thinks beyond the intensity and sustainability of freight and servicing operations provided to buildings in the City of London. As many trips originate outside the City, the Corporation should consider the potential negative impacts on other boroughs. This issue could be addressed through closer working between the Corporation and London boroughs to improve the traffic and environmental sustainability of freight and service transport across the whole of London, rather than individually within their own political and geographical boundaries.</p>	<p>The City Corporation has undertaken research looking at the causes and effects of freight intensification. While many aspects – particularly consumer demand and delivery pricing tactics – are beyond the City's control, the SPD does address aspects such as storage space on site.</p> <p>This SPD and the supporting Delivery and Servicing Plan guidance aims to encourage businesses and individuals to consider the impact of delivery and servicing techniques through procurement and purchasing. Work to date suggests that few organisations or individuals consider delivery method when ordering goods. Initiatives such as the Click and Collect website currently being promoted by the City can help change behaviour in these areas.</p>
11.4	<p>Paragraph 63: the requirement to achieve freight consolidation should perhaps come before the discussion of using out-of-town consolidation centres, as out-of-town consolidation centres are simply one means by which the consolidation of goods can be achieved, and will not be suitable for all supply chains and product types. Further relevant</p>	<p>Text added to para 62 to refer to emphasise that procurement-led management is a form of consolidation.</p> <p>Out-of-town reworded as 'out of central</p>

	<p>publications about urban consolidation centres and their associated operational issues can be provided if desired.</p> <p>The use of the term 'out-of-town' in relation to consolidation centres may be somewhat misleading given that at the start of the paragraph it is stated that the consolidation centre should be in Greater London.</p>	London'
11.5	<p>**Paragraph 64: The organisation producing the DSP may well not be aware of the specific routing to be used [from a micro-consolidation centre], as this will be decided by a freight operator once the scheme is in existence – so may not be appropriate to request as part of the DSP submission. Also, the vehicle type to be used may not be known at the time of writing the DSP – the key point should be the requirement of the use of cleaner vehicles. Obtaining suitable sites for micro-consolidation is likely to prove challenging in the City of London given the limited land available and its cost.</p>	Para 64 updated to require the DSP to commit to clean, safe, efficient vehicles, and efficient routing rather than specify these details upfront.
11.6	<p>Paragraph 65 (and 79): In terms of personal deliveries to workplaces, the FTC 2050 academic team are unaware of the necessary research having been carried out to demonstrate that this is definitively the most sustainable and efficient solution to the problem of online shopping. There is a need to study the range of ecommerce delivery systems (to home, to locker bank, to collection point, and where these should be located – near home or work – and to workplace either direct or to nominated carrier for final movement in a consolidated load) before it is possible to determine the best solution.</p>	<p>Acknowledged. Personal deliveries to places of work will be considered as part of the delivery and servicing of the premises.</p> <p>The promotion of click and collect options for deliveries to be deposited outside the City – particularly at public transport hubs is likely to form part of the solution for some businesses.</p>
11.7	<p>Paragraph 67: The reduction of on-site storage space in retail stores and offices over time, as a result of rising land values, has led to smaller, more frequent deliveries and thereby more intensive freight transport systems. Therefore the provision of adequate on-site storage space for goods is a positive step. However, is greater compulsion than encouragement possible and could the Corporation play a role in providing shared storage space?</p>	<p>Para 67 reworded to strengthen the need for storage on-site.</p> <p>The provision of shared storage space for smaller businesses is not currently being considered by the City Corporation, but may form part of a future workstream.</p>
11.8	<p>Paragraph 70: Does the Corporation therefore have a 'quiet delivery agreement' and what does a 'commitment to minimise noise and pollution impacts' mean in practice? It would be useful if these points</p>	The City Corporation generally uses the TfL Code of Practice for Quieter Deliveries as a basis for agreements. This can be used as the

	<p>were clarified in the Guidance.</p> <p>As commented on in relation to paragraph 64, it is likely to be difficult for the developer to know details of delivery and servicing timings and their management to minimise noise impacts at the point of submitting the DSP.</p>	<p>basis of a quiet delivery agreement, and should be updated as required to ensure that it addresses the main sources of noise.</p> <p>Para 70 text updated to specify a commitment rather than details of delivery timings/noise reduction.</p>
11.9	<p>Paragraphs 71-74: It is not clear what powers, if any, the Corporation can use to ensure/enforce these preferred delivery times and booking systems. The same is true for vehicle routing guidance (72); vehicle selection (73); and vehicle and driving standards (74).</p>	<p>The main tool available for enforcement is the DSP, and monitoring and enforcement will be key (see comment in 11.11)</p> <p>Monitoring will require evidence of booking records, vehicle type and routing as specified in the DSP. Some aspects, particularly around vehicle management and driver behaviour may be evidenced by FORS or similar accreditation.</p>
11.10	<p>Paragraph 75: It would be useful to include guidance on measures to 'ensure that the movement and safety of pedestrians, cyclists and other road users is not adversely affected and there is no adverse impact on the amenity of nearby residents' if they are available. In terms of engine-idling – is any restriction/enforcement possible?</p>	<p>Additional detail on highway obstruction added to para 75.</p> <p>The City Corporation has the ability to issue Fixed Penalty Notices to drivers who refuse to switch off their engine while stationary.</p>
11.11	<p>Paragraph 76: At present, the monitoring and enforcement of DSPs in London is weak. The Corporation could take a lead in insisting on the submission of monitoring reports, and the enforcement of infringements of DSP agreements in London.</p>	<p>Agreed. As set out in section 7, additional resource is being made available for enforcement of DSPs.</p>
11.12	<p>Paragraphs 77-83: The Corporation could consider applying a requirement to consolidate deliveries of goods inward to small and medium sized office developments as well as larger ones – again this would lead the way in London and nationally.</p> <p>Compulsory internal logistics/concierge systems should be considered by the Corporation for large multi-tenanted (and single tenanted) buildings without plans for such operations. This would remove the need for delivery drivers to travel upstairs and goods lifts to make deliveries to tenants inside</p>	<p>While physical consolidation is likely to be suitable for many buildings, the City recognises that for some organisations, other methods of reducing the number and impact of delivery and servicing trips may be more suitable.</p> <p>Text added to para 83 section to</p>

	the building, while their vehicles occupy kerbside or off-street space and affect road vehicle traffic flow. Instead, these drivers would make their deliveries to staff employed by the building in the loading bay/door, thereby allowing the drivers to depart quickly and free up parking space for other road users.	recommend internal logistics systems
11.13	Paragraphs 84-94: Considerations concerning compulsory internal logistics/concierge systems should also be given by the Corporation for retail operations, the hotel and hospitality sector, residential and student accommodation. Similar consideration should be given to any other larger buildings that currently require drivers to penetrate the building to find the consignee and make deliveries including public sector buildings, healthcare facilities and educational establishments.	Text added to para 83 section to recommend internal logistics systems
11.14	Paragraphs 95-98: The Corporation needs to ensure that adequate monitoring and enforcement of Construction Logistics Plans (CLP) takes place.	<p>All construction site activities are regularly monitored by the City's Highways Team, as part of our Considerate Contractors Scheme. Any activities within the public highway are licenced (e.g. hoardings, scaffolds, pit lanes, road/lane closures), and the need for such provisions should be included within the CLP. Failure to follow the procedures stated in the CLP, or agreed as a condition of issuing the licence, could result in the licence being rescinded and the Developer being referred to Planning Enforcement for a breach under Section 187 A of the Town and Country Planning Act 1990.</p> <p>In reality, this is not required as early engagement with the Highways Team is positively encouraged, to assist in developing the CLP, liaison with adjoining businesses, reviewing potential conflicts, agreeing changes and maintaining that contact</p>

		throughout the construction period.
11.15	Paragraph 99: As explained in responses to paragraphs 76 and 95-98, the Corporation of London could take a lead in London, and nationally, in insisting on the submission of DSP and CLP monitoring reports, and the enforcement of infringements of DSP and CLP agreements. In addition, the Corporation should consider the application of DSPs and CLPs to smaller sites subject to development, as well as to existing buildings.	Noted. As set out in section 7 the City Corporation is allocating resources to enforcement. The requirement for DSPs at smaller sites will be considered in the Local Plan review.
12.1	<p>**Overall the Mayor and TfL welcome this document and strongly support the Vision and Aims expressed within it. The Mayor welcomes the content in the draft SPD as it aims to reduce air and noise pollution, and congestion within the City of London. Officers at the GLA and TfL looks forward to further positive engagement with the City of London to promote the SPD in the coming years.</p> <p>Notwithstanding the above the Mayor has some minor additional detailed comments:</p>	Noted.
12.2	Information on the new Direct Vision Standard for HGVs should be included in the Policy section and at Appendix C. TfL is developing proposals for a HGV safety standard permit scheme which we will consult on soon. Further information is available at <a href="https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/direct-vision-in-heavy-goods-vehicles">https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/direct-vision-in-heavy-goods-vehicles</a>	Included in Appendix C
12.3	<p>The document states Construction Logistics Plans (CLPs) will be required in the City" for all major developments, where a development will have a significant impact on the transport network during construction..."</p> <p>How a "significant impact on the transport network" is interpreted and defined in practice as developments come forward will therefore be of crucial importance. TfL reminds the City that public transport and highway capacity issues, especially on the TLRN, and improving the safety of all road users, particularly vulnerable road users like pedestrians and cyclists, are key strategic priorities for the Mayor and TfL. TfL will therefore expect continued support and co-operation from the City in relation to</p>	Noted. The City Corporation will continue to work closely with TfL on development impact on the transport networks, and uses the TfL CLP guidance for developments within the Square Mile.

	developments that may have significant impact in these areas, all of which should produce and adhere to CLPs following the new TfL Best Practice guidance.	
12.4	TfL Freight and Strategy colleagues have suggested further detail should perhaps be provided in the document on how the City will monitor the success of the plan and enforce its proposed measures, to make it even more robust and effective.	Monitoring on a site-by-site basis will primarily be done through the DSP. Text added to para 76 to clarify this as the main form of monitoring. Enforcement detail is to be developed, so no additional detail added at this time.
12.5	TfL supports the proposal to limit personal workplace deliveries. TfL Planning is promoting the same approach in other dense and rapidly growing parts of London.	Noted.
13.1	-It is pleasing that consideration has been given to both air and noise pollution as these are critical for people with respiratory and hearing impairments respectively.	Noted
13.2	-Great consideration should be given to the impact of new technologies prior to their introduction to the City. It is requested that the Access Team are consulted when (or if) the need arises.	Noted. The SPD does not introduce new technologies itself, but the Access Team will be consulted on the emerging Transport Strategy.
13.3	-We reiterate the importance of enforcement, for example on-street loading can restrict the width of footways, block access to drop kerbs and restrict the line of sight for pedestrians.	Noted. Enforcement of loading conditions in planning consents and DSPs will be improved as set out in section 7.
14.1	CRP supports the overall vision of the SPD (54, p.14) – to “reduce the number of freight and delivery vehicles and their environmental impact on the City’s streets, particularly at peak times, whilst still allowing the City to flourish and avoiding negative impacts beyond the City’s boundaries.” As a vision it links closely to the aims of the draft Mayor’s Transport Strategy.  CRP supports the aims set out in the draft SPD and we believe that these could be used as a framework to monitor the design and success of delivery and service plans.  CRP is well-positioned to assist in delivering several aspects of the SPD.	Noted.

14.2	<p>**CRP has extensive experience in co-ordinating and reducing freight and servicing trips, including co-ordinating the 'West End Buyers Club' preferred suppliers scheme.</p> <p>The City of London Corporation could look at a similar model that meets the procurement and delivery needs of businesses in the square mile.</p>	<p>The City Corporation is actively engaging with businesses on the feasibility of developing this sort of scheme, and welcomes the input from CRP on this work.</p>
14.3	<p>**CRP has experience in helping to establish consolidation centres, for example Camden Consolidation Centre, and whilst it is good that the draft SPD supports them in principle, it should be acknowledged that the successful implementation and utilisation requires the location being appropriately near to the final delivery destination, with financial or in-kind support from statutory partners such as local authorities to ensure long-term viability and support from businesses.</p>	<p>The City Corporation is examining opportunities for providing space for consolidation within and outside the City. The need for support to ensure the viability of consolidation centres is noted, and the City will work with partners to maximise the potential of these schemes.</p>
14.4	<p>To help businesses reduce the number of personal deliveries at workplaces, CRP has developed the behaviour change 'Click. Collect. Clean Air.' This programme is built around an interactive online guide (<a href="http://www.clickcollect.london">www.clickcollect.london</a>) to the various 'click and collect' options available to people near their homes. The City of London Corporation is currently using this in-house and could look to extend this to developers and businesses within the square mile.</p>	<p>The City Corporation is actively promoting this website to external stakeholders and the general public to encourage deliveries to be taken at collection points near home.</p>
14.5	<p>As acknowledged by the draft SPD, new development should seek to facilitate out of hours deliveries where possible. The City benefits in this regard by having low residential densities compared to neighbouring London boroughs which have greater need to restrict delivery hours. Dedicated space for servicing vehicles and for storage of a range of goods within the confines of the development should be sought. Where this is not possible, DSPs should specify delivery protocols that minimise noise and other disruption through the use of technological on-vehicle solutions such as white noise alarms and quiet roll cages.</p>	<p>Agreed. While the City does have defined residential areas which may not be suitable for night time servicing, where there is less sensitivity, quiet deliveries taking place out of hours should be encouraged.</p>
14.6	<p>It is important that the potential impact of freight trips is acknowledged and appropriate routes with suitable vehicles are employed.</p>	<p>Agreed. The SPD notes this importance.</p>
14.7	<p>Through the West End Buyers Club CRP has experience of selecting preferred suppliers using a number of different criteria, including around</p>	<p>Noted. The City Corporation will continue to liaise with CRP on identifying suitable</p>

	reduced emissions vehicles and alternative modes. We recognise the value of such criteria in improving local air quality and contributing to businesses' Corporate Social Responsibility policies.	suppliers.
14.8	CRP has been the lead partner in a transnational 4.5 year feasibility project, FREVUE ( <a href="http://www.frevue.eu">www.frevue.eu</a> ) which as tested and proven the viability of fully electric freight vehicles across a range of vehicle classes and uses. The lessons learnt should encourage the uptake of electric vehicles by suppliers, further reducing the negative externalities of deliveries and servicing caused by engine noise and tailpipe emissions.	Noted.
14.9	**The benefits of a DSP should be highlighted in the guidance to reduce the need for monitoring by the City Corporation. Businesses and buildings that use a DSP effectively and as a live document can realise efficiency savings and therefore it is in their interest to maintain a level of compliance that exceeds the statutory requirements as set out in the SPD.	Text added to para 60 to emphasise benefits of a good DSP.
14.10	<p>**While it is important to consider, plan and implement DSPs throughout the development process, many actions, particularly related to procurement are relevant for tenants after a development is complete. The City of London Corporation should ensure that guidance, best practice advice and support is available to these businesses to ensure that practices are implemented well beyond the design and build stage.</p> <p>CRP has experience working with large and small businesses across multiple sectors (office, hospitality, retail, events) to encourage and support positive change.</p>	Agreed. The SPD is supported by DSP guidance and several workstreams to provide advice and support to businesses wishing to manage their deliveries and servicing.
15.1	The CPA welcomes the opportunity to respond to the draft SPD and is broadly supportive of its objectives and direction of travel. With the City of London becoming ever-busier and accommodating more and more people, it is important that the balance is redressed in terms of providing space for people, against motorised road vehicles. Delivery vehicles make up a significant proportion of City traffic, but the overall operation lacks efficiency. Therefore, the CPA acknowledges that more needs to be done in terms of reducing the overall number of delivery vehicles along with improving efficiency. However, it is important the finalised SPG builds in	<p>This is acknowledged. Section 4 of the SPD sets out potential measures for managing deliveries and servicing, but recognises that the level of management and appropriate measures will vary between developments.</p> <p>Text in the introduction to section 4 updated to clarify that the measures are suggested methods that can support an application.</p>

	<p>flexibility and focuses on “the outcome” (rather than specific measures), to allow a managed transition to reduced delivery and servicing movements, to ensure that the City of London maintains its competitive edge.</p>	
15.2	<p>**The over-riding theme of the draft SPD is consolidating deliveries made to new developments in the City, which can (with a well thought-out and implemented strategy) yield significant benefits through the reduction of delivery vehicles, and vehicle distance travelled on the streets of London.</p> <p>The CPA welcomes the implementation of measures which will drive down the number of motorised vehicles on the streets of the City of London, but seeks to ensure the draft SPG is not prescriptive in terms of the use of consolidation centres (and other such measures), rather that the desired outcome is the main objective as opposed to consolidation per se. It is important the finalised SPG provides sufficient support to “virtual consolidation”, rather than just physical consolidation centres, which is difficult to achieve even for the very largest developments in isolation.</p> <p>Consolidation relies on economies of scale, and requires significant investment in land, as well as double-handling of the product.</p> <p>The required investment cannot be generated on a building-by-building basis unless in keeping with a strategic approach. In order to use consolidation to address the challenges in the City, economies of scale must be maximised. A consolidation strategy should be co-ordinated by an overseeing authority to maximise success.</p> <p>The City Corporation should consider forming a partnership with an existing consolidation provider rather than setting developers the arduous task of devising a physical consolidation strategy on an individual building basis. A partnership approach could provide a go-to company to assist developers and landowners in developing a strategy, and maximise economies of scale.</p>	<p>The use of physical consolidation centres is just one way in which the aim of minimising freight trips to premises in the City can be achieved. Para 62 highlights smart or joint procurement methods as one way of achieving the effects of consolidation without necessarily using a consolidation centre.</p> <p>The draft Mayor's Transport Strategy proposes a strategic consolidation and distribution network across London which will maximise economies of scale for business.</p> <p>The City Corporation is currently exploring partnerships with existing providers for its own deliveries, and organisations within the City</p>

	<p>The City Corporation should be mindful that until the challenges of handling perishable goods through a consolidation centre can be understood and addressed, food and drink should not be handled through a consolidation centre.</p> <p>The CPA considers that the delivery process can be made more efficient through other consolidated delivery measures described in the draft SPD. This includes virtual consolidation, where multi-tenanted buildings, or neighbouring buildings could source deliveries from single suppliers for all tenants, i.e. preferred suppliers (notwithstanding coordination issues with the latter).</p> <p>The SPD should recognise the differing challenges between single and multi-tenanted offices – single tenanted buildings will naturally generate fewer deliveries as there is little or no duplication.</p> <p>There should be clarity as to the threshold levels the City of London Corporation would require for consolidation (either virtual or physical) to form part of the Delivery and Servicing Plan of a building. The CPA suggests a guiding matrix suggesting appropriate strategies would be beneficial, distinguishing between single/multi occupier, large/small buildings etc.</p>	<p>are encouraged to do the same. The City Corporation aims to support businesses to consolidate their deliveries, but recognises the differing needs of each business, so single consolidation arrangement provided by the City Corporation is unlikely to suit a large number of businesses.</p> <p>The challenges of physical consolidation of perishable goods are acknowledged, but facilities such as refrigerated micro-consolidation centres do exist. Alternative methods of managing deliveries may be more suitable for perishable goods.</p> <p>Text added to para 83 on multi-tenanted offices.</p> <p>The SPD does not require consolidation, but aims for the number of deliveries and their impact to be minimised while still allowing the City to flourish. Deliveries may be managed in several ways as outlined in section 4 of the SPD.</p>
15.3	<p>Paragraph 3 should more clearly explain the other documents referred to and provide headlines from these documents, clarify the weight that should be given to these documents and whether the SPD should take precedence.</p>	<p>Short description of each document added to Appendix C.</p>
15.4	<p>Paragraph 17 should refer to relevant sections of the Mayor's Transport Strategy, and provide a summary of their intent and how the SPD and the Mayor's Transport Strategy are consistent with each other.</p>	<p>Para 25 provides more detail on the direction of the MTS.</p>
15.5	<p>Paragraph 25 could be made clearer through an explanation of the emerging themes of the Mayor's Transport Strategy. The reference to</p>	<p>More detail added to para 25.</p>

	consolidation centres needs to be placed in context, and more generally the SPD should be looking to reduce the impact of deliveries and make them more efficient – this should not always necessarily be through physical consolidation centres.	
15.6	Paragraphs 37-49 would benefit from a brief further explanation of these other documents, including current status, date of publication and timescales for review.	The SPD links to several policies and strategies across the City Corporation. In the interest of keeping this document as short as possible, the relevant parts of these documents are signposted in the text, along with key dates. Full documents are available on the City Corporation website.
15.7	Paragraph 37 – It would be beneficial to combine or set out in an appendix to the SPD the Delivery and Servicing Guidance mentioned, and clarify the status of the guidance following publication of the final SPD.	The DSP guidance is included as appendix B. Reference to appendix B added
15.8	Paragraph 50 describes the area-wide ban of delivery vehicles over 7.5 tonnes, unless they are delivering in the area; it would be helpful to include a plan of the ban area.	Text and image added to clarify this.
15.9	Paragraph 54 describes the over-riding vision of the draft SPD, which is generally supported, particularly that the SPD should be designed to promote a flexible approach in reducing the number and impact of delivery and servicing vehicles on the streets of the City of London.	Noted.
15.10	Paragraph 58 – The idea of promoting 'quiet evening or night time deliveries' is commendable, but in addition to the comments made in relation to paragraph 71 below, it must be acknowledged that background noise levels are lower at these times, so delivery vehicles and associated activities are likely to be perceived to generate a greater amount of noise.	Quiet deliveries can enable deliveries to take place in the evenings and overnight in some areas. Limiting the level of disturbance to residents is a vital part of overnight deliveries, so it is not proposed that out of hours servicing takes place in residential areas.
15.11	Paragraph 62 – The CPA commends the 'smart and joint procurement' approach, but further clarification should be provided on exactly what this means. The principle of single suppliers being encouraged in multi-tenanted buildings will be effective in reducing delivery vehicle numbers, whilst a similar approach for neighbouring buildings will equally deliver benefits. This can all be achieved without the capital investment,	Para 62 updated with additional detail on smart procurement.

	operational costs and double handling element of consolidation. An approach of a single supplier winning contracts to supply a local group of buildings could be effective as part of 'smart and joint procurement', with the potential to also yield the benefit of larger economies of scale and through the associated purchasing power.	
15.12	Paragraphs 63 & 64 – The CPA believes the principle behind consolidation centres is sound, but the City of London should be mindful of the implementation costs and additional delivery time (to allow for the 'double-handling' of goods) and allow a flexible approach to developing strategies to drive down the number of delivery vehicles. The additional challenge of temperature controlled, perishable deliveries (i.e. food and drink) should be acknowledged, and as such, these goods should be excluded from consolidation requirements until the systems are operating smoothly. The benefits of consolidated deliveries (not necessarily linked to a centre) or "virtual consolidation" should be acknowledged within the SPD; it is important to recognise the efficiencies that can be achieved through coordinating deliveries through single suppliers.	The potential cost implications of physical consolidation are acknowledged, but will vary between organisations and sectors. Delivery movements may be managed through other means, such as smart procurement.
15.13	The CPA wishes to highlight that consolidation centre planning obligations may make developments less attractive than the competition in neighbouring boroughs (or neighbouring existing buildings in the City of London) where consolidation is not a requirement. It is important that the City keeps its competitive edge and therefore the measures be applied flexibly, and the focus must be on "the outcome", rather than the measures, which should not narrowly fixate on physical consolidation centres, but instead holistically consider consolidated deliveries and associated virtual consolidation initiatives.	The SPD does not make the use of consolidation centre a requirement, but may be one practical method of minimising delivery trips to a site.
15.14	Paragraph 67 describes an aspiration for small buildings (with little or no ability to hold larger bulk deliveries) to form partnerships with neighbouring large buildings on the premise that they would be able to hold larger quantities of stock. This will be extremely challenging and is unlikely to be deliverable. Large building loading bays, and any stock holding areas are designed and sized for that building alone, and there is unlikely to be capacity for other buildings. Then there are also the issues with security of	A lack of available storage space can be a barrier for smaller buildings aiming to reduce the frequency of non-perishable goods deliveries. Sharing storage space with nearby buildings – perhaps as part of a joint procurement agreement for some goods – may offer some buildings a way of minimising

	deliveries and complexities with claims for lost product. The idea of building facilities management teams holding stock on behalf of other buildings is unrealistic. It is important that the finalised SPG sets out only realistic and viable measures.	deliveries without needing to allocate storage space within the building.  Text added to para 67
15.15	Paragraph 70 builds on the theme of evening, night time and weekend deliveries. Whilst the draft SPD acknowledges that nearby residences should be respected, and over-night deliveries are not likely to be appropriate at those times, the SPD should go further in allowing the relaxation of permitted day-time delivery windows. The SPD should also clarify what is meant by the term 'quiet delivery agreement'.	Quiet Delivery agreements are set out in more detail in the DSP guidance. Reference added.
15.16	Paragraph 71 describes very limited delivery windows which would apply in locations where over-night deliveries are not possible. Additionally, removing deliveries from a total of eight peak hours during the day risks creating visible peaks of delivery vehicles on London's streets during the interpeak periods (10:00-12:00, 14:00-16:00 and after 19:00) –the only hours where deliveries would be permitted. The resultant small delivery windows of 10:00-12:00, 14:00-16:00 and 19:00-22:00 are too restrictive and should be relaxed where over-night deliveries are not possible. Confining deliveries to these dramatically reduced delivery windows may increase the requirement for a larger number of loading bays. There equally needs to be appreciation for the additional costs that over-night deliveries will incur on medium and small sized developments, which will include additional staffing costs, out of hours transportation (for staff), and suppliers ability to deliver during those hours, that may simply make out of hours deliveries unviable.	On review of data the lunchtime restriction has been removed from the SPD, and definition of AM peak changed to 6.30-9.30am, expanding the interpeak period where deliveries and servicing should take place and providing a greater incentive for deliveries to be carried out off-peak.
15.17	Paragraph 76 mentions monitoring; it is presumed that this would be through existing Travel Plan and Delivery and Servicing Plan arrangements. This should be clarified as further monitoring requirements would cause concern.	Monitoring would be through existing DSP/CLP arrangements.
15.18	Paragraph 78 again mentions 'joint procurement' arrangements, but for neighbouring buildings; whilst the principle of this is supported, there are coordination challenges and the CPA would have significant concerns if anything more than 'encouragement' towards this was included in the	Noted. This paragraph encourages joint procurement where possible.

	final SPD. This may often not be deliverable.	
15.19	Paragraph 80 builds on the theme described at paragraph 67. Similar concerns apply here. In addition, moving deliveries to out-of-hours times will be challenging enough in itself with compressing deliveries into reduced windows, putting further pressure on the management of space, even within the largest of buildings. With the compression of deliveries to over-night in large buildings, it is extremely unlikely that there would be sufficient capacity to accommodate further deliveries for neighbouring buildings.	Text added to para 67.
15.20	Paragraph 81 suggests a voluntary code mandating consolidation for medium-sized offices. The SPD should clarify how a medium sized office is defined, whilst the City of London should look to provide the overall coordination for this; it is difficult to see how it could be delivered without strategic coordination.	Text added to para 81 defining medium sized business.
15.21	Paragraphs 83-94 discuss arrangements for retail, hotel and residential land use, and whilst these land-uses are less significant in the City of London, similar concerns as outlined above will apply.	Noted. The delivery and servicing patterns of retail/hotel/residential land uses are very different to office development. The potential measures outlines are likely to complement these more developed supply chain.
15.22	There should also be initiatives for reducing the number of waste management vehicle through consolidating waste collection contracts, i.e. preferred suppliers.	Commercial waste management is run by private firms so preferred supplier schemes may be part of a joint procurement arrangement. Text added to para 62.
16.1	<p>**The RHA are keen to explore alternative traffic management systems for members' vehicles, and see the London road network as key to enabling the sector to be able to operate efficiently and productively.</p> <p>The need to transport freight to, from, and within and where appropriate through the City of London has important implications for the Capital's prosperity and the quality of life enjoyed by residents, works and visitors.</p> <p>Competition for space requires a sensitive balance to be reached. A</p>	Noted.

	<p>world-class city relies on first-class efficient and reliable freight transport, but also has to be a place where people want to live, work and visit.</p> <p>Meeting the needs of customers is a necessary condition for success in any competitive market economy. Customers have dictated that the lorry provides the majority of freight transport as it closely meets customer needs.</p> <p>Achieving an efficient and sustainable distribution system for goods and services is one of the greatest challenges and calls for a collaborative partnership approach.</p>	
16.2	<p>**We welcome the planning process of requiring delivery and servicing plans, and the opportunity to deliver off peak is favourable to our sector. Requirement timelines should ensure that the sector has the chance to adapt to new requirements, and that the technology and infrastructure are capable of meeting demand. We worry that the national grid will not be able to cope with electric vehicle demand.</p>	<p>The SPD supports the roll-out of new technology through the provision of appropriate commercial vehicle charging infrastructure in loading bays. The SPD will be revised as required in the future to ensure that it keeps pace with changing technology.</p>
16.3	<p>**The consolidation centre strategy is one we support as long as access to and from is congestion free and proper facilities for visiting service vehicle drivers are planned. These tend to work best where there is a controlling interest, for example Heathrow Terminal Five.</p>	<p>Noted. The Mayors Transport Strategy proposes a network of consolidation centres, and the City Corporation is working with existing providers to establish whether existing schemes can be expanded.</p>
16.4	<p>**The planning system should be used to minimise the impact of freight operations. The opportunity to deliver off-peak is welcomed, but the concept conflicts with the London Lorry Control Scheme.</p>	<p>The impact on overnight loading of the London Lorry Control Scheme is acknowledged, however this affects only the largest vehicles, which make up a small percentage of deliveries in the City. Text added to para 70 to acknowledge LLCS.</p>
16.5	<p>**Freight planning should be considered at all stages of the development process to ensure that all implications are considered. Freight must be considered alongside the movement of people, especially avoiding conflict with pedestrians and cyclists.</p>	<p>Agreed. The City Corporation encourages early engagement on DSPs to account for planned schemes.</p>
16.6	<p>Accurate information on legal delivery locations and access to an</p>	<p>The City provides a weekly bulletin on street</p>

	<p>effective real-time journey planner would help to reduce inefficiencies. A coordinated approach to systems and restrictions affecting freight operations would be of benefit to London. We believe more “carrot and less stick” is required to encourage take up of new technology. For example installation of noise-reducing equipment could be granted exemption from the London lorry Control Scheme. We do not believe that technology will be in place in time to meet the requirements imposed on introduction of EV’S.</p>	<p>closures and works that may affect deliveries which can help with journey planning. A parking review will take place as part of the forthcoming transport strategy work. The LLCS is administered by London Councils and is currently being reviewed. This will cover noise standards of larger vehicles.</p>
16.7	<p>**Noise from lorries is often highly localised, and can be confined to small areas, or particular junctions. Dissatisfaction with noise from lorries may be used as an excuse for dislike of other aspects of lorries. If this is true, any reductions in lorry noise are not likely to lead to commensurate increases in satisfaction.</p>	<p>Noted.</p>
16.8	<p>The day-to-day servicing of ordinary shops by even modestly sized lorries can cause disruption to traffic, or damage to pavements when lorries park wholly or partly on them in order to unload. Few supermarkets and shops have facilities; people living nearby are likely to resent the intrusion, inconvenience and traffic disruption.</p>	<p>Noted. Through reduction of freight traffic, the SPD aims to reduce this disruption.</p>
16.9	<p>One area that seems to be missing from the document is engineering mitigation, particularly around soundscape and the built environment. Quieter road surface has a contribution to make. Smoothing out road humps will reduce noise emissions as vehicles no longer slow down and then speed up again. Maintaining the conditions of the road surface is just as important.</p>	<p>Road surfacing work is carried out regularly, and the City typically resurfaces 15-20 streets per year.</p> <p>There are no road humps on City streets except raised courtesy crossings where speeds are already low.</p>
16.10	<p>Any move to bring forward the ULEZ is unwelcome and has a direct impact on all who live within London and the boroughs as costs in the end are passed back to the consumer.</p> <p>Haulage sector operators had accepted the need for change (although not wanted) and had planned for the introduction of the ULEZ in 2021 bringing this forward to 2019 is seen as a means to start paying for the increased requirements of the MTS.</p>	<p>The City Corporation supports the early introduction of the Ultra Low Emission Zone in 2019 to address the poor air quality in the City.</p> <p>The ULEZ and its details are being developed by the Mayor of London, rather than the City Corporation.</p>

	<p>Any reduction in congestion is welcome, but again if this is at a detriment to the Road Haulage sector by early implementation of the ULEZ or by not listening to the debate around phasing euro IV and v engines out. We would also hope to see allowances made for specialist older vehicles by not having to pay the charges associated with the ULEZ when introduced.</p> <p>For operators of small HGV fleets, and single owner - operators, transport measures requiring them to upgrade their vehicle could pose a significant financial impact and could lead to an increase in retail prices of the goods they carry.</p>	
16.11	<p>The Plan's success relies on organisations with an interest and / or remit in freight working together in collaborative partnership to co-ordinate their roles and responsibilities in identifying and delivering the Plan.</p> <p>London is a challenging environment for heavy goods vehicles and road haulage operations. With the suggested increase in population expected over the next 25 years then the need for more and efficient services will be required and needs to be included in any planning for future traffic routing</p> <p>It is essential to understand fully the issues facing freight transport in the City of London which can only be achieved by actively engaging with a wide cross-section of stakeholders from the public and private sectors. However, what operators know and take for granted is often not understood by those making policy or developing schemes. This highlights the need for effective communication. Accordingly, the Plan has to promote working-together and shared understanding.</p>	<p>Noted. The SPD aims to clearly set out the City Corporation's expectations around freight and servicing to reduce uncertainty and allow successful planning applications. The City Corporation is also pursuing several other workstreams and working with the industry through the Member-led freight forum.</p>