

Appendix 2 – Internal Workshop Notes

Freight & Servicing SPD Internal Consultation Workshop Notes 23rd August 2017

Attendees

Eddie Jackson [EJ]	Strategic Transportation
Bruce McVean [BM]	Strategic Transportation
Tom Parker [TP]	Strategic Transportation
Lizzy Morgan [LM]	Strategic Transportation
Iain Simmons [IS]	City Transportation
Craig Stansfield [CS]	Transport Planning
Rory McMullan [RM]	Road Danger Reduction
Peter Shadbolt [PS]	Planning Policy
John Harte [JH]	Planning Policy
Janet Laban [JL]	Planning Policy
Melanie Charalambous [MC]	Public Realm
Kelly Wilson [KW]	Air Quality
Siobhan Marshall [SM]	Environmental Health
Aldo Strydom [AS]	Major Projects

1 - Do you agree with the overall vision and aims of the SPD?		
Name	Comment	Response
JL	a) Consider environmental impacts in the vision, rather than just referencing streets. b) Is there scope for a more traditional 'environmental, social, economic' approach to the aims and vision? c) Do we need to ensure that the aims show impacts and benefits beyond the City boundaries – there will be London wide impacts?	<ul style="list-style-type: none"> Removed word 'streets' from vision. The aim and vision structure is intended to be consistent with TfL's communications on freight management. Text added to para 55 to emphasise positive impacts beyond the City boundary. Text updated to include MTS vision zero and zero emission aims.

	d) Could we have a vision zero/zero emissions statement. Stronger, and aligns with MTS and current thinking with air quality and pollution narratives.	
BM	e) Could also consider including 'people' rather than just streets f) TfL language for the 'match' aim is clunky – could plainer English be used here for clarity? g) Could be a better reflection of the vision in the aims - demand and minimising can be used across both where possible	<ul style="list-style-type: none"> Removed word 'streets' from vision to include the human aspect of the City. Language aims to be consistent with TfL messaging. Matching demand to capacity indicates that not all freight trips should take place out of hours, but capacity constraints require sensible use of the street space. Wording of aims slightly updated to better reflect vision
MC	h) Congestion and road danger reduction are not referenced consistently between the aims and the vision i) Could be a better reflection of the vision in the aims – use of the same wordings such as flourish. j) Is mitigate the right word? Should it be reduce? k) Two aims are much larger than the third – could this be addressed?	<ul style="list-style-type: none"> Wording of aims slightly updated to better reflect vision The '3 Ms' structure and content is consistent with TfL messaging; 'mitigate' reflects the fact that some negative impacts of freight are inevitable, but that these can be managed.
PS	l) The current SPD focuses on controlling current development but it does not cover existing development. It can be applied to some changes that may arise in existing buildings requiring new applications but s73 applications mean that a new development may be governed by older planning regulations – this SPD would not apply in this instance. m) Enforcement through planning of noise disturbance is difficult if it is individuals (drivers/delivery personnel etc) causing the noise.	<ul style="list-style-type: none"> Noted – the SPD is one of a range of workstreams aimed at reducing the impacts of freight and servicing. Agreed that planning enforcement is not always appropriate. Noise disturbances may be enforced through Environmental Health.
RM	n) Generally satisfied with the vision and aims. Deliveries, commuters and servicing vehicles usually share the	<ul style="list-style-type: none"> Noted. The SPD aims to strike the balance between off-peak deliveries where possible, and reducing noise in sensitive

	road at the same peak times. Retiming deliveries so deliveries are carried out at different times seems like a good solution, but acknowledge the possible tension between road danger reduction and reducing noise disturbance.	locations overnight.
KW	o) What is the relationship between the SPD and the City of London Delivery and Servicing Guidance?	<ul style="list-style-type: none"> The DSP Guidance provides supporting information on the practical introduction of a DSP, including template documents and sample actions.
2 - Do you think that the measures proposed are appropriate? How will they affect your team and work area?		
Minimise Freight and Servicing Trips		
MC	a) Good mix of measures to meet the aim. b) Campaigns around each measure could be useful to help take up and encourage these measures from existing businesses	<ul style="list-style-type: none"> A campaign level of detail is not yet developed, but several workstreams will support the adoption of measures outlined in the SPD.
JL	c) There is on-going work to enforce these measures where they are part of planning conditions d) Can these measures be brought in as part of the pre-application process? e) Waste measures can also include digesters for food waste – but this could be out of scope for this document f) Use of the river significantly reduces lorry movements. There is a review of Walbrook Wharf's use at present which may show scope for increased use that can link in to this work. Swan Lane pier could also be reviewed as part of future Local Plan reviews.	<ul style="list-style-type: none"> Enforcement will be an important part of ensuring effective introductions of DSPs. Early engagement with the City Corporation on what a DSP should cover is encouraged. Text added to para 61 on early engagement. Para 68 updated to note compostable material in line with Local Plan DM17.1. Noted – use of Walbrook Wharf is encouraged.
BM	g) We need to be careful with phrasing. Personal deliveries are worded with residents and employees in the same group. We can encourage click and collect for residents but limiting deliveries to residences isn't	<ul style="list-style-type: none"> Para 65 text updated to remove reference to residents.

	correct.	
CS	h) Limiting servicing vehicles and movements is very difficult but highly aspirational. There needs to be some good policies and suggestions to back this up	<ul style="list-style-type: none"> Agreed – the development of the new Local Plan and Transport Strategy will support the direction of the SPD.
Match Demand to Network Capacity		
JL	i) Are there security issues associated with moving goods movements to night? Also, is this more difficult for certain goods types such as perishables? j) Routing preferences need to extend beyond the City boundaries k) Is matching the network capacity what businesses want or just what the City wants? l) Is booking software readily available for businesses to use? m) Make sure servicing is as well captured as deliveries as part of the network capacity measures n) Can waste management be heavily encouraged as part of the SPD? It can be built into a circular economy narrative for the businesses	<ul style="list-style-type: none"> Security and perishable goods issues must be dealt with on a case-by-case basis. It is possible that off-peak delivery may improve some security aspects as high-value or perishable goods can be moved more quickly. Route management for all stages of the journey are noted in para 72. Matching demand to network capacity has benefits for the City, businesses and the freight industry. Responses to this consultation demonstrate support. The DSP Guidance (linked in appendix) contains links to available software. Para 68 on waste management - wording strengthened.
MC	o) Before 7 for retiming is good. Beer deliveries as well as food deliveries could be reasonably moved to these times where possible. There are still off peak conflicts – it is very busy at all times in the City.	<ul style="list-style-type: none"> Agreed – appropriate timings will vary from sector to sector and in different areas of the City.
BM	p) Could there be a hierarchy of options? Overnight retiming where possible, and out of peak otherwise q) Would a map beneficial for developers as part of producing their DSP with regard to identifying best routes?	<ul style="list-style-type: none"> To retain flexibility, the SPD does not suggest a formal hierarchy of options but makes clear (para 71) that daytime deliveries should follow consideration of out of hours options. A map showing preferred routes may be included in the DSP.
CS	r) Clarification is needed on what entails a best routing – what is the safest could mean the worst for the	<ul style="list-style-type: none"> In line with TfL's CLP guidance, routing for heavy vehicles should be based on the Strategic Road Network which is more

	<p>environment</p> <p>s) Existing route preferences are for the TLRN and SRN. Would that still be the way forward in the context of this SPD?</p> <p>t) Booking systems have proven to be a very useful addition for businesses of various sizes – those with off street loading facilities as well as those who require their deliveries to be made on street</p> <p>u) Regular servicing could be built into the booking systems</p> <p>v) Waste returns can be incorporated into a consolidation methodology</p>	<p>suitable for heavy vehicles, and most appropriate for motor traffic. Para 72 updated to reflect this.</p> <ul style="list-style-type: none"> • Para 71 notes that servicing trips should be included in the booking system. • Para 67 on waste returns updated to note the link with a consolidation strategy.
Mitigate the Impact of Freight Trips		
JL	<p>w) Deliveries and servicing need to be more equal – servicing isn't as clearly picked up here</p> <p>x) As before, could there be a hierarchy of measures here?</p>	<ul style="list-style-type: none"> • 'servicing' added to vision statement. • To retain flexibility, the SPD avoids a formal hierarchy of measures. The City is encouraging the most effective forms of mitigation through other workstreams.
CS	<p>y) Pedestrian and PT space impacts of re-modelling – what would the impacts be to rail and footway capacities?</p> <p>z) What counts as considerate loading? Is there guidance for this? There could be conflicts between resident and business requirements</p> <p>aa) How does this fit in with the other measures? Can they be linked?</p> <p>bb) DSPs can be difficult to enforce – could we add that DSPs need to be part of a S106 agreement?</p>	<ul style="list-style-type: none"> • The impacts on footways of freight and servicing re-modelling from motor vehicles is unclear at present, as the level of change, and impact of technology amongst other things is still unclear. Text added to para 76 on monitoring activity at street level. • 'Considerate loading' does not have specific guidance, but kerbside activity will be looked at as part of the transport strategy. • Enforcement will be an important element of the SPD, and additional resources will be allocated to improve adherence to DSPs.
MC	<p>cc) PT travel isn't clearly noted, could it be added in?</p> <p>dd) There needs to definitely be an emphasis on noise as</p>	<ul style="list-style-type: none"> • Public transport may be an alternative mode, particularly for servicing trips. Text added to 'Mitigate' section to reflect this.

	part of considerate loading	
BM	<p>ee) Is there a chance to look at out of hours rail deliveries here or is this out of scope of what the SPD can deliver?</p> <p>ff) Is innovative technology in scope of this document?</p>	<ul style="list-style-type: none"> • Out of hours rail deliveries may be part of the solution for some deliveries, but typically requires bespoke infrastructure to enable the potential. • Innovative technology may have a role to play, especially in mitigating the impact of freight and servicing trips. Role of technology is mentioned in para 13-15 of the SPD.
General		
KW	gg) Could the website or SPD point to guidance, case studies or best practice regarding the content of the SPD, for example delivery consolidation; this list could be updated periodically.	<ul style="list-style-type: none"> • The supporting DSP Guidance in appendix B contains links to best practice guides from TfL and other sources.
RM	hh) We should also explore the potential of a procurement club to help businesses consider their options.	<ul style="list-style-type: none"> • This is being explored.
SM	ii) The SPD mentions the benefits of click and collect. However, could this lead to a shift of the problem to other areas and introducing noise in areas of the City where there wasn't?	<ul style="list-style-type: none"> • Click and Collect can provide benefits by rationalising the number of drop offs in the City, and encouraging City workers to use collection points near home – reducing the need for deliveries in the most congested parts of London.
KW	<p>jj) Education will be valuable in raising awareness regarding the cumulative impact of multiple deliveries on air quality in the city.</p> <p>kk) The SPD / Guidance could acknowledge the need for driver training and education for air quality and noise mitigation, for example switching off engines when parked.</p>	<ul style="list-style-type: none"> • Education of individuals will be important in raising awareness but this is beyond the scope of the SPD. • Driver training will be important, and forms part of the City's No Idling campaign, and is included in the FORS standards.
RM	ll) Do we know the extent of the problem of personal deliveries?	<ul style="list-style-type: none"> • It is very difficult to establish a precise number of personal deliveries to work – the number varies significantly between organisations. The City Corporation is promoting Click & Collect locations close to people's homes to encourage use of alternatives to deliveries to work.

3 – Are resources available to ensure the measures are enforced?		
JL	a) S106s need to be sorted earlier as part of the planning process to get the measures in and enforceable	<ul style="list-style-type: none"> This will be fed back to the Development Planning team.
CS	b) We do not have much resource. Additionally, a lot can be lost in the planning processes as they're often unenforceable. DSPs are more aspirational than reality in many cases. c) Agree that s106 agreements need to be arranged earlier. Pre apps are fundamental for the need to get this information in the planning process early, as well as help inform the building infrastructure for delivering the measures d) It is hard to be proactive as delivery issues do not generate significant complaints from businesses or developers	<ul style="list-style-type: none"> Acknowledged. Additional resources to support the production and enforcement of high quality DSPs are planned (section 7) Comment on pre-apps noted. Will be fed back to Development Planning. Acknowledged. The negative impact of delivery and servicing on the City is not always clear to the business or individual receiving the goods or services.
BM	e) The structures themselves and the expected deliveries need to be mentioned	<ul style="list-style-type: none"> The physical design of loading bays are set out in the Standard Highway and Servicing Requirements (appendix C)
MC	f) Campaigns are important for existing developments. Monitoring isn't mentioned enough. Section 7 seems to indicate that the City Corporation will be employing someone specifically to monitor planning conditions? g) Section 7 could be stronger.	<ul style="list-style-type: none"> Additional resource is planned for the enforcement of DSPs. This will help ensure that the programme of monitoring set out in a DSP is adhered to.
JH	h) Enforcement and monitoring is difficult, especially with larger developments. There is some reliance on the goodwill of the developer to fulfil planning conditions.	<ul style="list-style-type: none"> Acknowledged. The need to enforce appropriately will be fed back to the Development Planning team.
KW	i) The City Corporation has a published Enforcement Plan –should this be referenced in s7?	<ul style="list-style-type: none"> Section 7 updated
RM	j) Adherence to planning conditions needs to come from the buy-in of senior staff, as well as City Corporation	<ul style="list-style-type: none"> Acknowledged. The City Corporation is working with several City business through the City Freight Forum to ensure buy-in

	Members.	from senior staff.
PS	<p>k) Some enforcement may come from reactions – people can report some obvious breaches of planning control.</p> <p>l) Need to bear in mind that the SPD isn't a policy document. The SPD could explore enforcement options for example; a public reporting service if a building fails to act on their planning conditions.</p>	<ul style="list-style-type: none"> Acknowledged. The Enforcement Plan sets out the reporting process.
4 - Is there anything not covered in the SPD that you think should be included?		
JL	a) Security issues have changed. CoLP security review of proposals would be useful. This could be a security impact assessment or similar.	<ul style="list-style-type: none"> Security issues will vary from site to site, and security aspects should be assessed with the City of London Police on a case by case basis.
BM	b) Increase the references and potential measures regarding servicing.	<ul style="list-style-type: none"> Most measures are relevant to deliveries and servicing trips. Servicing added to vision statement to strengthen this aspect.
MC	c) Is there an opportunity for area based policies? Would this need a change to the Local Plan first?	<ul style="list-style-type: none"> Area-based policies are a possible next step in managing deliveries and servicing, but are beyond the scope of this version of the SPD and would require additional policy development.

5 - Post-workshop comment

	Comment	Response
CS	a) Data on peaks of freight traffic, pedestrian and cycle flows suggest that to reduce co-incidence of pedestrian/cycle peaks and freight traffic, 'servicing-free' periods (para 71) should be re-defined. Specifying a lunchtime servicing-free period would create a small window for essential daytime deliveries and cycle & pedestrian numbers are lower than in the traditional peaks. The AM and PM peaks should also be reconsidered to ensure that servicing avoids peak pedestrian and cycle flow periods.	This is acknowledged, and the comment from CPA (comment 15.16) raises a similar issue. On review of the data, the proposed lunchtime restriction has been removed, and AM peak restriction is brought forward to 6.30 – 9.30am (para 71 and glossary). This better covers the peak of pedestrian and cycle use on City streets, and provides a longer daytime off-peak period for servicing.

