

CONTENTS

Page No

1	INTRODUCTION TO STUDY	1
1.1	Project aim	1
1.2	Project approach	1
2.	THE KEY INITIATIVES OF THE CLFQP	2
2.1	Acting as a vehicle to bring industry and local government	
	together	2
2.2	Raising the profile of the freight industry	3
2.3	Responding on a holistic basis to consultation exercises	4
2.4	London Loading/Unloading Code of Practice	4
2.5	PCNs and "Hotspots"	6
2.6	The software initiative to allow PCN issuing software to	
	identify PCNs issued to commercial vehicles	8
2.7	The Tottenham Court Road initiative	10
2.8	The wide range of initiatives that the CLFQP has been involved in	12

1. INTRODUCTION TO STUDY

This study looks at certain aspects of the working of the Central London Freight Quality Partnership (CLFQP). The report was commissioned by Professor Michael Browne, Chair of the CLFQP.

1.1 Project aim

This study is concerned solely with identifying and summarising the key initiatives directly instigated by CLFQP; those funded through the CLFQP but where there was limited involvement of the wider membership of the CLFQP; and initiatives in which CLFQP had an involvement through its members/participants.

1.2 Project approach

This project was undertaken by reviewing the papers held on file by the CLFQP and by discussion with the Chair, some members of the CLFQP and the current and former members of the Secretariat. From this review of papers and discussions, the key initiatives that would be the subject of detailed examination were agreed with the Chair.

2. THE KEY INITIATIVES OF THE CLFQP

Research into the working of the CLFQP has revealed the large number of wide-ranging and varied initiatives that the CLFQP has been involved with during its existence.

In essence, there are 3 main types of initiative that the CLFQP has engaged in:-

- Those directly instigated by CLFQP (For example, research into the scope for out of hours deliveries).
- Those funded through CLFQP but where there was limited involvement of the wider membership of the CLFQP (For example, (a) the software initiative to allow Penalty Charge Notice (PCN) issuing software to identify PCNs issued to commercial vehicles and (b) the re-design of Tottenham Court Road by Camden Council to improve loading and unloading).
- Initiatives in which CLFQP has an involvement through its members/participants. (For example, the Brewery Logistics Group (BLG) and Westminster Council initiative about PCNs in which a post to investigate ways to reduce PCNs was jointly funded by the BLG and Westminster).

But, in addition, there is another role that the CLFQP has played which is of paramount importance. This concerns the trust that the CLFQP has been able to engender through public and private sector engagement and through the dialogue that has ensued, the better understanding and awareness of freight and servicing issues that has been created amongst all the CLFQP's participants. This is a major success story for the CLFQP.

The remainder of this section looks in more detail at this role, together with other key roles that the CLFQP has played. It also looks in detail at four key initiatives in which the CLFQP has been involved and highlights a number of other wide ranging and diverse projects that have included CLFQP involvement.

2.1 Acting as a vehicle to bring industry and local government together

Delivering and servicing is vital to the capital's economy and there can be little doubt that when the CLFQP was formed, there was a degree of misunderstanding between industry and local authorities about the loading and unloading needs of delivery drivers.

It is clear that the CLFQP has played a pivotal role in helping to overcome these mis-understandings and any mistrust this engendered. The CLFQP has enabled a wide ranging circle of stakeholders - urban authorities, businesses, freight operators, environmental groups, the local community and other interested parties - to come together to work in partnership to address specific freight transport problems. Indeed, CLFQP events have provided potentially good starting points for pilots, projects and initiatives. It is easy to downplay, and not fully appreciate, the benefits that can accrue from stakeholders with very different views in the freight and servicing fields coming together to discuss problems. Industry is sometimes not good at communicating with local authorities (and vice versa) and the CLFQP has greatly assisted with improving these communications. Face to face discussions can help to build relationships and help develop a much better common understanding and awareness between stakeholders of the views of other parties. Once these views are properly understood by each side, common objectives become clear that make it is far easier to move forward and seek mutually acceptable ways to address the issues that have been identified.

The CLFQP has provided the means to create this dialogue and so create the trust between the public and private sectors that is necessary to move forward. It is very evident from the continued good attendance at CLFQP meetings that members still value the opportunity to come together to exchange information, experiences and initiate projects regarding urban freight transport. (Indeed, it is understood that there is better attendance by operators and businesses at CLFQP meetings than at other Freight Quality Partnership meetings). Given the high level of seniority of members within their parent organisation, attendance would undoubtedly diminish if members did not consider that their time was being well-spent.

2.2 Raising the profile of the freight industry

Freight transport has traditionally not been very high on the agenda of many local authorities, in part because it is a complex industry to engage with, but also because historically authorities have never had any direct responsibilities in this field. But freight is important and matters to everyone. Indeed, everything in our shops, offices, factories and homes has been transported at some stage. So the efficient movement of freight is important to the UK's economic wellbeing.

The CLFQP, through acting as a central conduit for freight related activity in central London, has played a key role in raising the profile of the freight industry. It has, through building links with local authorities, been influential in ensuring that the needs of the industry are more closely considered by local authorities and that authorities develop a package of strategic and practical solutions in conjunction with the freight industry to find local solutions to local problems. This has resulted in proactive engagement in freight issues rather than a responsive "enforcement" based approach.

This effective dialogue, which opens the right channels, is as important as the delivery of physical projects and again it is easy to downplay the role that the CLFQP has played here. Having an organisation that has a respected public profile gives the freight industry another means of encouraging and creating innovative solutions for delivery and movement of goods within central London. It has also set a framework within which those in the freight industry and the boroughs can positively channel their energies to finding solutions of mutual benefit to themselves and the central London community. The more

effectively and positively energy can be channeled in pursuing these solutions, the better.

2.3 Responding on a holistic basis to consultation exercises

Individual responses to consultation exercises are usually made from a particular position and merely offer confirmation of a narrow perspective. So a response from an organisation like the CLFQP – comprising a membership of both public (local authorities & TfL) and private organisations (businesses & freight operators) – can sometimes be of greater value to the consulting authority as a more rounded, authoritative response can be expected.

The CLFQP has responded to a number of consultation exercises since its inception. These include consultations on additional parking charges and other traffic penalties; the London Low Emission zones; Part 6 of the Traffic Management Act 2004; and responses to Transport Select Committee investigations into Taxes and Charges on Road Users and Freight.

2.4 London Loading/Unloading Code of Practice

2.4.1 Problem identified

With limited road space and many competing demands on that space, there were clear difficulties in ensuring that appropriate loading/unloading arrangements were available in central London. These difficulties were being exacerbated with drivers ignoring the rules, incorrect enforcement and inconsistent communication between traffic authorities and delivery companies.

The end result was that delivery vehicles operating in and around central London were experiencing large-scale difficulties and incurring high volumes of parking fines. Indeed, some FTA members were citing costs in excess of £1 million in fines, just for delivering to stores, restaurants, banks and bars in the capital. As well as reflecting a negative impact on congestion and imposing an enforcement resource cost, such costs inevitably are passed on to customers and act as a direct drag on London's economy.

The costs to businesses of managing the large number of PCNs that were being issued were also becoming a growing problem. Indeed, more and more businesses began to find it cost effective to employ staff solely to administer PCNs.

2.4.2 Measures taken to overcome problem

In order to try to address this problem, it was decided that the best way to proceed was by means of a co-ordinated partnership approach, involving major business and industry groups/organisations, traffic authorities and parking enforcement authorities. The initial work was led by the Brewery Logistics Group and pre-dates the launch of the CLFQP. One of the key outputs from this partnership was the production of a London Loading/Unloading Code of Practice.

The Code of Practice was designed to set out commonly agreed principles intended to improve communication, make the system work as best as it could, reduce the impact of traffic, reduce the number of invalid parking fines issued and reduce the number of appeals submitted, thus saving all groups time and resources. One of the key sections of the code was specific guidance for delivery staff, parking attendants and traffic authorities. A revised version of the Code issued in May 2008 also contained guidance on Closed Circuit Television enforcement.

The Code of Practice is designed as an all encompassing document, aimed at encouraging best practice from all the parties involved in the loading and unloading of vehicles. One of its key strengths is that it does not point the finger of blame but instead stresses that everyone has a role to play and that by working together, the parties can make the system work as best as it can.

Although the FTA were in the lead in driving this initiative forward, the CLFQP made it possible, firstly by bringing together members to help work on the drafts and then by



commenting on the drafts at both Steering and Working Group meetings.

The CLFQP also subsequently played a key role in disseminating the Code of Practice widely. Members came forward with a number of suggestions of organisations that could be contacted to publicise and use the Code.

2.4.3 Outcome

Although it is difficult to prove statistically, it is extremely likely that the Code will have played a role in helping to reduce the number of parking fines issued to drivers engaged in loading and unloading (although there are obviously other factors in play here such as increases in loading times and the seminars and guidance available to members of the Freight Operator Recognition Scheme). This will have brought attendant benefits in reduced congestion and enforcement activity.

The nature of the Code has also meant that it has been widely welcomed across all parties. The document is incorporated into training programmes for civil enforcement officers and drivers alike. In addition, the success of the Code in London led to a national Code of Practice being introduced. This has been of particular value to local authorities outside of London taking up their own civil enforcement powers, as the Code has ensured that such authorities do not start from scratch in drawing up procedures to control loading and unloading, thus alleviating the danger of the same mistakes being made again that had occurred previously in London.

2.5 PCNs and "Hotspots"

2.5.1 Problem Identified

As highlighted in paragraph 2.4.1, delivery vehicles operating in and around central London were experiencing large-scale difficulties and incurring high volumes of parking fines. But an investigation into the parking fines that were being issued showed that there were certain areas where delivery drivers were incurring the most fines. Unsurprisingly, in the CLFQP area, most of these districts were concentrated in the City of Westminster and the London Borough of Camden – areas with the greatest commercial activity where many retail, restaurant and business interests are to be found.

2.5.2 Measures taken to overcome problem

Since its inception, the CLFQP had discussed at its meetings the need to be able to identify "hotspots" where the most penalty fines were issued, so that once these areas were highlighted, operators and enforcement authorities could work together to manage loading and unloading activity better.

To find out what the position was in Westminster, the authority and Tradeteam carried out a "hotspot" review and circulated the findings to the CLFQP. Having ascertained that there was a problem in certain areas, a Business Account Manager was appointed within the City of Westminster Council (part funded originally by the Brewery Logistics Group, then by the FTA) to look specifically at the difficulties commercial vehicle drivers faced when undertaking kerbside deliveries. The study investigated the areas where most parking fines had been issued (and the time of day that the fines had been issued). The work was focussed on the Health & Safety issues surrounding loading and unloading.

This process proved very successful. The Business Account Manager spent time out on the road with delivery drivers to ascertain at first hand the difficulties they faced when loading and unloading; she also spent time with the civil enforcement officers to learn their perspective on the issue; and discussions were held with senior company officials about the problems that were being encountered and possible remedies.

Armed with the results of the exercise – which showed that many of the problems arose as a result of driver misunderstanding of the rules – it was possible to move towards overcoming these problems.

2.5.3 Outcome

One of the key developments that came from this work was the publication of an FTA guide entitled "Delivery Assessments – Best Practice". The guide provides advice on how authorities should analyse and record their PCN data and how this PCN analysis can be used to identify "hotspots" where the most PCNs are issued. It then sets out a path that should be followed to reduce the number of PCNs issued in these "hotspots".

Data provided by the FTA in their report "Delivering in London: PCN report", which showed where FTA members were incurring the most parking fines, would seem to bear out the benefits of such approaches being carried out. Indeed, the progress made speaks for itself.



City of Westminster

	2007/8	2008/9	Out of the Top Ten:
1.	Regent Street	Regent Street	Berkeley Street from 3
		non-mover	
2.	Berkeley Street	The Strand	Jermyn Street from 4
		new entry	
3.	Cavendish Square	Kingly Street	St Martin's Lane ↓ from 5
_		new entry	
4.	Jermyn Street	Wardour Street	Dean Street from 7
		new entry	
5.	St Martin's Lane	Charing Cross Road	Oxford Street from 9
		↑ from 6	
6.	Charing Cross Road	Baker Street	St Alban's Street
		new entry	
7.	Dean Street	Great Marlborough St	
		↑ from 8	
8.	Great Marlborough St	Cavendish Square	
		I from 3	
9.	Oxford Street	Piccadilly	
		new entry	
10.	St Alban's Street	Brewer Street	
		new entry	

London Borough of Camden

	2007/8	2008/9	Out of the Top Ten:
1.	Charing Cross Road	Shaftesbury Avenue	Whitfield Street
		↑ from 7	
2.	Tottenham Court Rd	Charing Cross Road	
		↓ from 1	
3.	Southampton Row	High Holborn	
		↑ from 6	
4.	Lambs Conduit St	Southampton Row	
		All for an O	
_		↓ from 3	
5.	Kentish Town Road	Tottenham Court Road	
		✓ from 2	
6.	High Halbara		
0.	High Holborn	Kingsway	
		↑ from 8	
7.	Shaftesbury Avenue	Kilburn High Road	
1.	Shallesbury Avenue	Ributti High Road	
		↑ from 9	
8.	Kingsway	Lambs Conduit Street	
0.	Kingsway	Lambs Conduit Street	
		✓ from 4	
9.	Kilburn High Road	Kentish Town Road	
		↓ from 5	
10.	Whitfield Street	Theobalds Road	
		new entry	

Thus the initiative has shown that by identifying priority "hotspots" and adjacent businesses, developing loading plans and assessing if demand and business needs can be met legally, it is possible to reduce the number of parking fines issued in a particular area.

2.6 The software initiative to allow PCN issuing software to identify PCNs issued to commercial vehicles

2.6.1 Problem identified

The difficulties experienced by businesses and delivery drivers in loading and unloading have been at the core of the CLFQP's work since its inception. As the CLFQP advanced its work in this area, it was realised that whilst all boroughs had the ability to analyse parking data by offence code, in most boroughs there was no capacity to separate out PCNs issued to commercial vehicles and private individuals. Without this capacity, meaningful data could not be provided that would enable both operators and enforcement authorities to better manage loading and unloading activity, leading to a reduction in the number of PCNs issued.

2.6.2 Measures taken to overcome problem

It was a primary aim of the TfL Freight Unit to get boroughs to upgrade their parking software so that civil enforcement officers across London could capture data relating to the types of vehicles that they were ticketing. Using this information, it would be possible to identify those areas where delivery vehicles receive large numbers of PCNs – "hotspots" – and thereby focus project work on these areas to improve facilities for deliveries where practicable and where funding allowed.

TfL applies a vehicle type flag on the database to all PCNs issued on the TfL Road Network (TLRN). In discussion with TfL, Camden adopted a coding frame very similar to that used by TfL and upgraded their software and implemented data capture at the end of 2008/9. Camden produced instructions to Civil Enforcement Officers to enable them to identify vehicle type. (The classification for delivery vehicles includes small vans (below 3.5 tonnes), large vans (over 3.5 and below 7.5 tonnes), rigid lorries and articulation lorries). Camden and TfL distributed these notes to other boroughs to encourage similar coding frames for other authorities in London.

This issue was one that the CLFQP discussed at its meetings on a number of occasions as it strove to get the parking software upgraded. However, with TfL engaging directly with Lambeth (as well as Camden), it was agreed that the CLFQP would engage with the City of London, Islington, Kensington & Chelsea and Southwark on the issue. (Westminster were trialling their own data capture system).

In 2010, Kensington & Chelsea upgraded their PCN software and now have the provision to identify the freight PCN flag on their system. However, the City of London has not been able to progress this matter within their new system and are looking to achieve "vehicle capture" by asking their Civil Enforcement Officers for the classification of vehicles at the time the PCN is issued. (Unfortunately, the reporting in their system is not yet at a stage where this would be a reportable field).

2.6.3 Outcome

The TfL Freight Unit tabled a report to London Councils' Transport and Environment Committee on 3 March 2009 recommending that boroughs upgrade their PCN software to include vehicle classification. Progress in this matter has been slower than hoped – during this study it has been suggested that further progress in this area is limited by lack of funding from TfL on freight matters due to current economic circumstances and somewhat hindered by the dissolution of TfL's Freight Unit. It is also unclear whether in those authorities that have the technology, the information "captured" is being put to the best use. But as all authorities eventually move both to using the software, and then utilising its findings, boroughs will have a powerful tool to identify problem areas and develop appropriate solutions.

2.7 The Tottenham Court Road initiative

2.7.1 Problem identified

Tottenham Court Road is a major road in central London that runs north of Oxford Street up to the Euston Road. It is a busy, vibrant and significant shopping street, best known for its high concentration of electronics shops, particularly in the southern half (Oxford Street end) and home furnishing stores in the northern half (Warren Street end). The road is wholly within Camden.

In this location, as elsewhere, local waiting and loading restrictions and the mix of bays, including loading bays, had developed incrementally. However, loading requirements change over time and if arrangements do not reflect current needs, loading and unloading activity may take place in contravention of local restrictions, leading to a relatively high number of parking fines being issued.

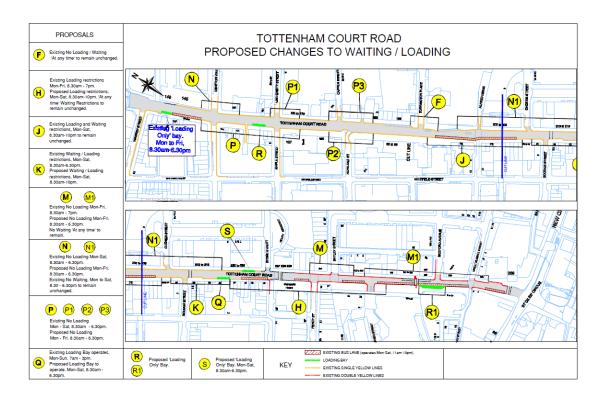
Camden Council had conducted a rolling programme of waiting and loading reviews across Camden's town centres. These locations and main roads were places where relatively high concentrations of PCNs tended to be issued, and despite the absence of detailed information about vehicle types (paragraph 2.6), the Council was aware that Tottenham Court Road was likely to be a PCN "hotspot" for deliveries. This reflects the data in the FTA's "Delivering in London: PCN report" (see table in paragraph 2.5.3).

2.7.2 Measures taken to overcome problem

In order to encourage loading and unloading to take place legally and safely, Camden Council carried out a review in 2007 of the waiting/loading and parking controls in Tottenham Court Road (where traffic moves northbound) and in Gower Street and Bloomsbury Street (the gyratory for southbound traffic).

The purpose of the review was to rebalance arrangements so as to better meet current needs. In undertaking the review, Camden also aimed to simplify the waiting and loading arrangements, thus making them easier to understand. The review also aimed to introduce additional loading bays where possible.

A widespread consultation was subsequently undertaken. This included seeking views from all properties within the consultation area, local and statutory groups, Emergency Services, Ward Councillors & Westminster City Council.



Extract from consultation document

Throughout the process, the CLFQP was updated and kept informed by Camden Council on the outcome of the consultation and the proposed changes. This was important as it enabled the CLFQP to understand the development process, helping to place it in a position to be able to offer useful guidance to other authorities attempting to improve loading and unloading facilities at other specific locations.

2.7.3 Outcome

Following the consultation, the Council agreed to simplify waiting and yellow line loading arrangement times and also introduced three additional loading bays. The Council also produced a very informative leaflet containing information on waiting and loading restrictions on both parts of the gyratory system, loading bays and the location of pay and display bays for customers of local businesses. The leaflet also provides information on how to understand the signs and road markings on the street.

Further details of Camden's waiting and loading reviews are included in the council's Annual Parking and Enforcement Reports (<u>www.camden.gov.uk/pep</u>). The council's parking and loading leaflets can be downloaded from www.<u>camden.gov.uk/wheretopark</u>.

Following these changes, the FTA reported that Tottenham Court Road had dropped from 2nd place to 5th in terms of the number of parking fines issued to its members in Camden. Camden's database of PCN information also shows that PCN numbers fell.

The advantage of a project like this is that once a *design exemplar* has been established, this design can be rolled out to other areas that experience high levels of freight activity.

2.8 The wide range of initiatives that the CLFQP has been involved in

Since its inception, the CLFQP has been involved in a large number of wideranging and diverse initiatives. These have varied from commissioning a major study into Out-of-hours delivery through to querying credit card surcharges imposed in one London borough for the payment of PCNs by credit card.

These initiatives include:-

Camden "Clean Air through Green Fleets" initiative. The CLFQP was asked to Chair the Camden "Clean Air Through Green Fleets" conference. The successful event comprised various presentations on the topic of the freight transport industry's role in improving London's air quality.

Consolidation. The CLFQP has worked to raise awareness of the Consolidation projects taking place in the UK and has taken a particular interest in the Regent Street Consolidation Centre initiative.

Credit Card Surcharges in Camden. When Camden council started to apply a payment surcharge of 1.3% to all credit card transactions, and this charge was applied to payment of PCNs relating to loading and unloading, the issue was taken up by the CLFQP.

Cycle freight. The CLFQP was involved in setting up and evaluating a pilot cycle freight delivery scheme where Office Depot has been operating 3 cargocycles to deliver paper supplies to offices in the EC1-4 postal districts. It has also been involved in another pilot project that involved delivery of Borough market traders' produce into local cafes and restaurants.

Delivery and Servicing Plans. The CLFQP has been involved in discussions over the production of a number of Delivery and Servicing Plans, most notably the Church Street area in Westminster.

Differential Charging. When differential charging for PCNs was introduced, the CLFQP drew attention the fact that more higher level band penalties were being issued to commercial vehicles than lower band penalties. It highlighted the matter in its response to the Transport Select Committee investigations into Taxes and Charges on Road Users and Freight.

Electronic Freight Mapping. The CLFQP was involved in a project to build on existing LIP funded electronic freight mapping work in Islington and Hackney. **Intelligent Transport Systems and urban freight and servicing.** The CLFQP has held a number of discussions on how telematics could be used to benefit freight operations. These discussions have covered wide ranging issues such as how telematics could be used to manage usage of loading bays through to track and trace systems.

Olympic Route Network. For the last 2 years, the CLFQP has been discussing with the Olympic Delivery Authority and other relevant authorities the difficulties that the establishment of the Olympic Route Network will have on the freight and commercial vehicle sector.

Out of hours Delivery. The CLFQP commissioned a survey to investigate the issues of out-of-hours deliveries from a central London, mixed use perspective and has sought to build on the report's findings by finding a willing borough partner to identify an area to study.

The 40 minute rule. The CLFQP highlighted the discrepancies in the methods of observation authorities were undertaking before issuing a PCN. Discussions held with borough enforcement authorities indicated that this appeared to be due to historical practice. The CLFQP subsequently worked with the boroughs and London Councils to foster a more consistent approach across the boroughs.

Traffic Congestion in Oxford Street, Regent Street and Bond Street. The CLFQP has provided members to take part in the investigation into traffic congestion in the above areas of the West End.

Waiting and Loading Studies. The CLFQP has worked with local authorities in a number of areas as they undertake delivery and loading studies. Recent projects include the Hampstead Town Centre Waiting and Loading Study and the Chalk Farm Road Parking and Loading Plan.

Website. The CLFQP contributed towards the development of the TfL Freight Information Portal through keeping an internet activity diary for 2 weeks. Information contained in the diaries highlighted sources of freight and servicing information which was of use to the industry.

It should be noted that the above list is a far from definitive list of all the projects that the CLFQP has been involved in and merely gives a flavour of the diverse and wide-ranging issues that the CLFQP has worked on. Such diversity of theme not only improves the 'freight' dialogue in central London, it is also a valuable source of information and helps to maintain private sector involvement.

Further information on the CLFQP:

http://www.londonsfqps.co.uk/FQPs/CentralLondonFQP.aspx

Contact:

Dennis T Lynch Central London Freight Quality Partnership C/o Transport Studies Unit University of Westminster 35 Marylebone Road London NW1 5LS

T: 020 7911 5000 F: 020 7911 5057 M: 0791 7544411

E: lynchd@westminster.ac.uk