

Bromley Market Square

Site Survey Analysis



Prepared by



on behalf of:



Version 1.0 April 2007

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Prepared by



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Project Number	N/06/327
Version	1.0
Date	April 2007
File location	
Last edited	
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“In supporting sustainable freight facilities in London Policy adds reference to TfL’s Freight Plan and indicates support for freight consolidation centres and that there is need for a number of small freight facilities within the urban area”

**Draft further alteration to the London Plan, 2006
(Representation for the London Borough of Bromley)**

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1 METHODOLOGY

The research was carried out in the following way:

- Photographs taken on site visits.
- Initial site visit to gain awareness of issues and discussion with the Bromley parking services manager (7th November 2006).
- Business profile (23rd November 2006).
- Morning delivery observations (7.30am - 10.30am on 23rd November 2006).
- Afternoon delivery observations (4.00pm - 5.30pm on 27th November 2006).
- Retail Surveys (23rd December 2006 and January 2007).
- Forum (28th February 2007)

The site visits provided the opportunity to look at the freight traffic generators in the area in question such as supermarkets, restaurants, take-aways, etc. The business profile was carried out in order to better understand the affect that businesses have on freight movement.

Throughout the project close links have been established with different Borough officers. Indeed, Borough officers from the London Borough of Bromley were consulted as to their views and opinions concerning the provision of loading and unloading within the Borough. Representatives in Parking Services, Transport Planning, the Town Centre Manager and the local Chamber of Commerce were all invited to comment on hot-spots within the Borough that they deemed to have sufficient problems with loading and unloading that warranted funding to investigate possible solutions.

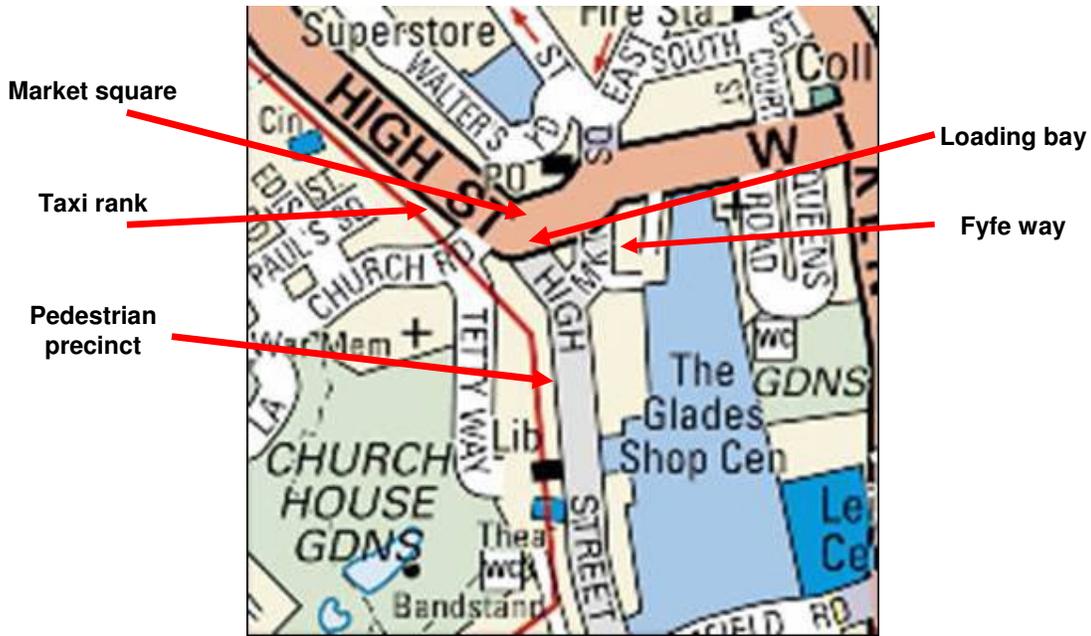
Further consultation was also carried out to investigate the incidence of Penalty Charge Notices (PCNs) that have been recorded to further justify the sites that were proposed by the relevant stakeholders.

2 THE LOCATION

2.1 General presentation

Bromley is the largest London Borough and one of the most affluent. The main economic activities centre on clothing retail. The town has a large shopping and retail area including a pedestrianised High Street and The Glades shopping centre. It is one of the ten major metropolitan centres identified in the London Plan. There are two railway stations providing connections to the City and West End. There is also a main shopping centre (The Glades) that has direct access to the pedestrian precinct. Bromley town centre boasts one of the most popular shopping venues in the South East. It provides year-round access to a wide range of specialist shops together with popular chain stores.

Figure 2.1: Description of the site



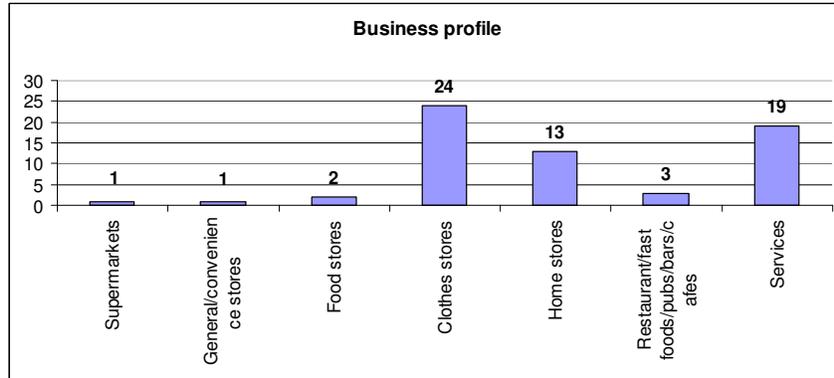
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Market square is a large pedestrian precinct covering 2 streets. In general the traffic in the town is quiet and there are not traffic jams, just short-time congestion due to the number of cars/buses/delivery vehicles which are parked on the Market Square. The main congestion problem is found in the area that is the focus of this report.

As it can be seen, there is a mix of uses of the area, between 2 bus stations, one loading bay, one taxi rank, a transit road and the entrance of the pedestrian precinct. As a result, this area functions with different uses and types of business stakeholder.

2.2 Business profile

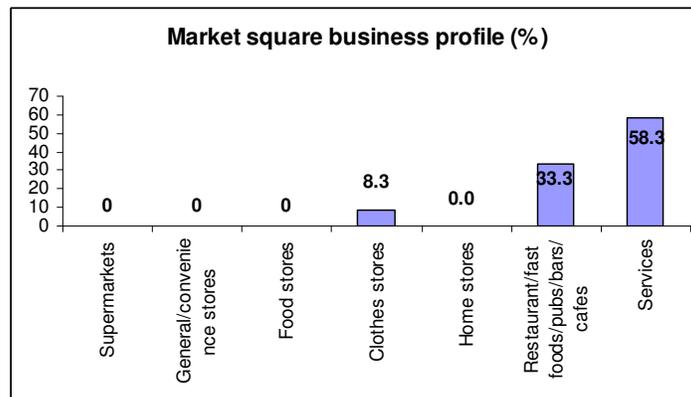
Figure 2.2: Business profile



The pedestrian High Street, with its weekly Farmer’s Market and range of coordinated events, is complemented by The Glades Shopping Centre. As a result, the High Street is mainly composed of medium to high value retail.

However, there is also a degree of non-retail business activity here. As a result, it creates a contrast between the transit and local business activities.

Figure 2.3: Market square business profile



The shops located on Market square are very different from those located on the High Street. Indeed, it provides more services and/or take-aways. This is significant because it means that many car drivers want to stop at the parking bay to go to the cash machine or to buy food from take away outlets. For them, the loading bay is very useful.

Among the main shops on High Street and Market Square:

- More than 50% of the shops in that part of Market square / High Street are made up of “**food businesses**” (including pubs, restaurants and take-aways). These businesses receive fresh food everyday and they often have various suppliers and shippers. They have on

average 20-40 suppliers but only two or three freight transporters operate for them. Deliveries are made throughout the day.

In addition, it can be observed that freight operators use different types of vehicles, depending on the type of goods being delivered. For example, soft drinks, beer and food are delivered by temperature controlled delivery vehicle. Deliveries to restaurants are often made from different types of delivery vehicles (from vans up to 7.5T vehicles) and beer is one of the most difficult goods to deliver (no pallets or parcels, but kegs which can only be transported one by one).

- **“Services¹”** form a significant number of businesses located on High Street. Indeed, even if they do not receive a lot of deliveries (with the exception of the hairdresser) they frequently receive parcels or stationery etc. As a result, during peak hours it is very difficult for couriers to find an area to park even for a short period of time. Compared to other goods deliveries, parcels deliveries are made in a very short time (between 3 and 5 minutes per delivery) and couriers cannot afford to waste times finding a place to park which is far from the delivery point. The time spent finding a place to park to deliver must not be longer than the delivery time. However, the restrictions applied in that area cause a number of problems for those types of deliveries.

“Services” on average receive 2 or 3 deliveries per week, but it depends on the number of employees². There is a big difference between the different types of service (up to 6 deliveries a day for some hairdressers and 1 delivery a week for some solicitors).

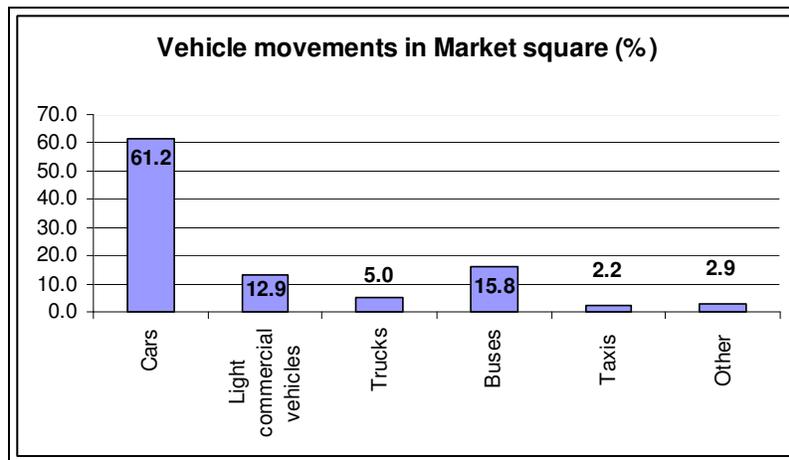
- **“Clothes shops”** are very important on High Street. These types of shops have a specific supply chain. They often receive clothes once or twice a day from large vehicles. In addition, from the truck to the shop, deliverymen sometimes need space to transport clothes.

2.3 Vehicle movements

The part of High Street located between Market place and The Glades is an area reserved for pedestrians and vehicle access is totally forbidden. On Market Square, an on-street observation (8.30am - 9.30am) shows that the road is a transit road with a high number of cars.

¹ Services include all businesses whose main activity is not dedicated to the selling of goods (such as solicitors, hairdressers, etc.).

² According to respondents in the on-street survey.

Figure 2.4: Vehicle movements in Market Square

There is no loading/unloading permitted on either side of the delivery bay. Other than clothes shops, the type of retail outlets vary greatly and vehicles deliver at different times of the day. However, the busiest loading period is in the morning (between 8am and 9am). Primarily commercial vehicles deliver to the High Street.

There have been no recent accidents recorded in this area.

According to retailers, there are on average 2 deliveries a day per shop and the average delivery time is nearly **28 minutes**. On-street observations showed that the time to load and unload was nearly **14.4 minutes**. Between 8am and 11am on a Thursday, 16 deliveries in total were observed.

Loading and unloading usually takes place on Monday, Tuesday and Friday, in the morning and for lunch.

2.4 Types of vehicles

The table below shows that it is mainly small vehicles that use the loading bays. The presence of refrigerated vehicles can be explained by the high number of restaurants on the site.

Table 2.1 Vehicles using the loading bays

Vehicles	Number
Vans + transit vans	12
2 axles up to 7.5T	3
3 axles	1

In summary:

- Clothes and services make up nearly 70% of the shops. Different kinds of trucks are used to deliver goods.

- There are, on average 1.7 deliveries a day per shop and the average time to load / unload is nearly 28 minutes (according to the retailers) with a big gap between services / clothes shops and food businesses.
- There are lots of services so there are lots of couriers who use Market place for a short period of time.
- The time spent to deliver on the two loading bays located on Market Square is 14 minutes.
- Market place is a busy place where conflict develops between cars and freight vehicles in circulation.

3 LOADING / UNLOADING RESTRICTIONS

3.1 Restrictions

Figure 3.1: Locations of restricted areas



No vehicles are permitted in the pedestrian precinct except for market vehicles on Fridays. There is only one loading bay on Market Square, which at night (between 10pm and 3 am) is designated for use by taxis. Indeed, between those times, no stopping is allowed except for taxis (night-time deliveries are prohibited). Taxis operate on Thursday, Friday and Saturday evenings.

In the rest of the area, it is not possible to load and unload due to:

- 2 bus stops;
- One taxi rank located at the North of the entrance of the pedestrian precinct;
- Elsewhere, there are zigzags or bollards which make it impossible to load or unload.

As a result, all loading and unloading operations should take place on the loading bay located at the entrance of the pedestrian zone on the northern side of the market square. This loading bay is next to a bus stop and is nearly 5 metres long.

Behind the shops on the western side of Market Square, is Tetty Way, a double yellow lined road which can be used for deliveries to shops with rear access. Behind the shops to the eastern side of Market Square, Fyfe Way is a double yellow lined road which can be used for deliveries to shops with rear access. Behind some of the shops there are parking bays that can be used to load and unload.

3.2 The road signage / prohibition to access

Figure 3.2: Road markings / bollards



The first picture shows the signage on the loading bay: the dual use of this parking area may confuse people who want to use it. The second picture shows the entrance to High Street (pedestrian precinct): the bollards prevent any vehicles from accessing the zone. As a result, deliverymen have to use the loading bay located at the entrance to the zone. This bay is mostly used by retailers / deliverymen who cannot receive goods via the back of their shops.

3.3 Deliveries behind the shops and restrictions

Figure 3.3: Entrance to delivery zone / loading bay sign



Since High Street is totally dedicated to pedestrians and business activities, there must be solutions for retailers to receive goods in good conditions. On the eastern side of High Street, the big shopping centre “The Glades” allows retailers on that side of the street to share loading bays. Retailers rarely use the Market Square loading bay if they can receive goods from the back of their shops.

On the eastern side of High Street, it is possible for retailers to receive goods from the back of their shops. Indeed, the first picture shows the entrance of the “delivery zone”. Retailers such as WHSmith, Mothercare, Primark, etc. use these loading bays without any problems. However some small retailers cannot use these loading bays and deliverymen have to stop at

Market Square. It is a “*big problem*” for them and some of them would welcome the opening of High Street in the morning for deliveries (this point is raised later on).

At the back of the shops there is a double yellow line, which means that enforcement is carried out by the Borough. There is specific restriction notification signage applied by the landlord at the entrance of the private loading bay located at the back of the shops; however there is no council notification of this restriction to the same effect:

Figure 3.4: “Loading bay is in constant use until 9pm, each evening vehicles will be clamped” (private signage)



Figure 3.5: The taxi rank on High Street



A taxi rank is located on northern part of High Street. There are 2 taxi ranks in the area, one for night and the other for the day. The signage indicates that “the standing shall be on the West side of the High Street commencing on the roadway 1 metre north of the door to 200/202 High Street and continuing southwards for 11.5 metres (...). This standing between the hours 22.00 and 3.00 will operate as a feeder rank to taxi standing No 5517 in Market Square, Bromley”.

It is not uncommon for deliverymen to park their vehicle in that area when the loading bay is busy.

3.4 Enforcement

The Borough uses CCTV to enforce the area and issues PCNs. 23 traffic assistants are dedicated to on-street enforcement in the borough, but only six in the centre of Bromley who concentrate on certain hot spots.

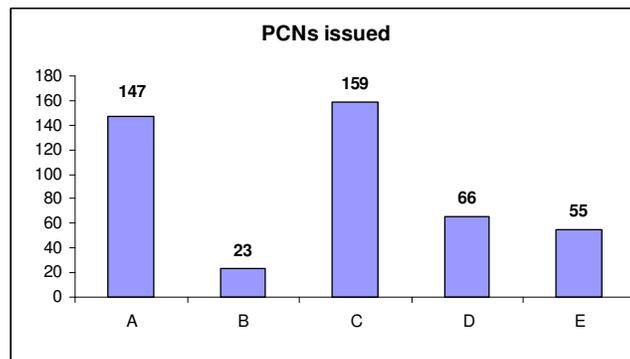
The delivery bay is dedicated to loading vehicles from 3am to 10pm and then to taxis from 10pm to 3am. Deliveries are allowed to last a maximum of 30 minutes. No return is permitted within 1 hour. Cars are accepted as delivery vehicles but are sometimes difficult to distinguish from illegal parkers in CCTV. For manual enforcement no formal observation period is in force in the area

There are very few appeals due to the CCTV evidence. People predominantly use the bays in order to use the cash points, purchase refreshments or another activity that takes only a few minutes. However, given that this is very common, the bay can be occupied the whole day by people parked there illegally.

It is not uncommon for a PCN to be issued by mistake, for example if delivery staff are in the process of delivering to a store on the other side of the square which takes a longer than average time, are moving stock around in the back of their vehicle or are in an unmarked delivery vehicle and the CCTV footage cannot see if loading/unloading is taking place and. This circumstance could be avoided by having more on-street enforcement to further investigate situations.

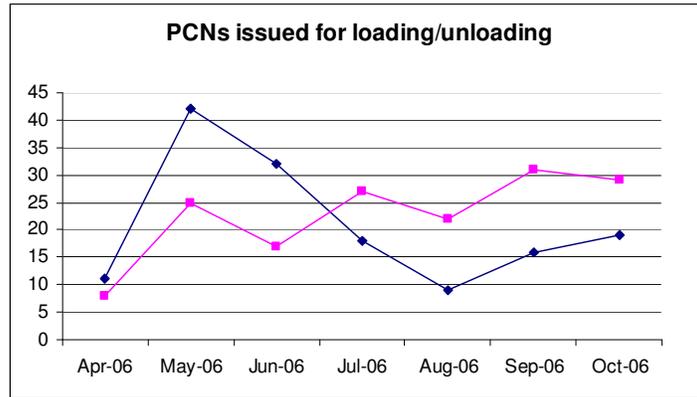
PCNs are issued with an £80 fine for an illegally parked vehicle but if paid within 14 days, this amount is halved. Money from fines is filtered into public transport, essentially the “Freedom Pass”, which is the Borough’s concessionary pass for pensioners and young and disabled people.

Figure 3.6: PCNs issued



On the diagram above, letters B and C represent vehicles parked or loading/unloading in a restricted street where waiting and loading/unloading restrictions are in force (B) and the vehicles parked in a loading place during restricted hours without loading. Statistics show that the majority of PCNs issued on Bromley Market square is linked to deliveries. The figure below shows the development in the number of PCNs issued:

Figure 3.7: PCNs issued for loading / unloading

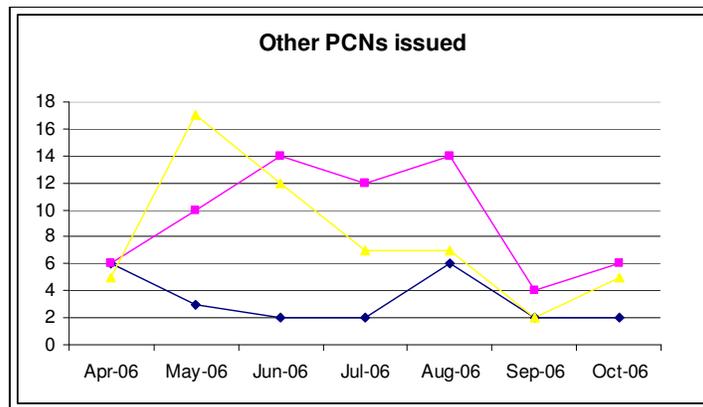


(pink) vehicles parked or loading/unloading in a restricted street where waiting and loading/unloading restrictions are in force.

(blue): vehicles parked in a loading place during restricted hours without loading.

In the diagram above, it is possible to see that the majority of PCNs are issued to vehicles that are parked without loading or unloading. Even though the diagram represents a short period, the fact remains that increasingly more vehicles park on the loading bay without being in operation. As a consequence it means that it is becoming increasingly difficult for deliverymen to use the loading bay because most of the time it is occupied illegally by other vehicles, mainly cars.

Figure 3.8: Other PCNs issued



(pink): vehicles parked more than 50cm from the edge of the carriageway and not within a designated parking place.

(yellow): vehicles parked for longer than the time permitted.

(blue): vehicles not parked correctly within the markings of the bay or space.

Contrary to the PCNs issued for the illegal use of the parking bay, the number of PCNs for illegally parking (without being directly linked to loading and unloading) is decreasing and is minimal in comparison to the number of PCNs issued for loading and unloading.

In summary:

- The loading bay is often illegally used by drivers to make a quick stop (to go to the cash machine).
- Some retailers would welcome the opening of High Street in morning for deliveries.
- CCTV footage allows a good enforcement of the area. Indeed, there are very few appeals due to the CCTV evidence.
- More than 50% of PCNs issued on the site are due to loading and unloading.
- Some deliveries can take more than 20 minutes.

4 OBSERVATIONS / HOTSPOTS

4.1 The loading bay

Figure 4.1: Typical use of the loading bay / car with hazard lights on



The first picture shows the typical use of the loading bay, a mixture of freight vehicles in operation and cars drivers who park for just 2 - 5 minutes (as shown in the second picture). Indeed, some drivers know it is illegal to park in this bay so they put on their hazard lights so as to 'justify' using it for a short period of time.

Observations also reveal that the current location and size of the loading bay is not ideal.

A sign warning that there is CCTV enforcement is required as the restriction signage is not very prominent cluttered and as a result regularly disregarded. A single yellow line on the delivery bay was removed after an adjudicator ruled that bays and lines should not be combined. This however gave a false impression to the public that it was a free parking bay. As a result, the Borough would like to change the location of the bus stop to install it where there is the current taxi rank, but it seems to be not a good idea according to Transport for London.

Figure 4.2: Car unable to leave the bay



During peak hours, there are a greater number of conflicts between car drivers, freight vehicles and public transport vehicles. In the picture above, it is difficult for the car to leave the bay, which stops potential delivery drivers from finding another place to load or unload.

4.2 Conflicts in the use: the transportation of money

Figure 4.3: Security van and guard



As it has been previously reported, there are a lot of banks at the entrance of the pedestrian precinct. The presence of the banks raises two issues:

- Security guards need to cross the road without protection which can be unsafe for the transporter.
- When the loading bay is busy, there is no place to park which means that the security guards have to park elsewhere. This increases the risk for security guards and people.

4.3 Use of the side-road for loading and unloading

Figure 4.4: Use of pallets and roll cages



Even if the loading bay were in a strategic location (at the entrance of the pedestrian precinct), there would still be problems between delivery drivers and pedestrians. On-street observations showed that most of the time, the loading bay was used to deliver goods which were then transported from the vehicle to store in pallets or roll cages.

Figure 4.4: shows that in this case the delivery driver does not encounter any problems transporting the pallets from the shop to his truck parked at the loading bay, but it is worth

noting the space taken up on the pavement by the pallet. This could be problematic when the street is crowded.

Another point that needs to be mentioned appears partially on the second picture. The roll cage contains food for a caterer based at the entrance to High Street. In order to carry out this delivery, the deliveryman needs to park on the loading bay and thereafter use the pavement which takes him close to the bus stations where people are waiting for the bus. In this case, there is the potential for conflict between the people waiting and the delivery driver.

4.4 Double parked due to occupied loading bay

Figure 4.5: Examples of double parking



The vehicle parked in the loading bay blocks another truck (bigger) to park. As a consequence, the bigger vehicle is obliged to double-park which creates problems for vehicles coming in from behind it. Indeed, if the road were busier, this situation would have created congestion. The delivery driver reveals that he cannot do anything else because he has to deliver goods to a pub which is at the entrance of the pedestrian precinct and there is no other place elsewhere. The driver mentioned that he has received lots of PCNs and cannot understand why parking attendants do not understand why he is double-parked.

Figure 4.6: Delivery vehicle forced to double park



In summary:

- During peak hours, there are a greater number of conflicts between car drivers, freight vehicles and public transport vehicles.
- There are a lot of banks at the entrance of the pedestrian precinct, which increases the risk for security guards and people.
- During the peak hours, conflicts can be raised between pedestrians and deliverymen using trolley.
- Some retailers complain because sometimes they are illegally parked because the loading bay is illegally used by cars. As a result, they receive a PCN while they have not other solutions. However, some of them prefer to park on the taxi rank when the loading bay is not accessible.

5 LOCAL STAKEHOLDERS' FEELINGS

In order to have a better knowledge and understanding of the site, retailers and deliverymen were asked a series of questions. In total 10 retailers and 2 delivery drivers were interviewed on different days and at different times of the day. The main ideas are detailed below:

- The retailers' responses regarding the problems that they or deliverymen may have vary greatly. Indeed, retailers who are able share loading bays at Glades or on Tetty Way have no problems with deliveries. For the others, it is quite far for them to deliver from the loading bay to the shops on High Street. It is also difficult when it is crowded.
- Some retailers would like to see the pedestrian street open to vehicles early in the morning to facilitate deliveries.

One deliveryman was questioned whilst delivering. He confirmed that is a "nightmare" to deliver goods using the loading bay. He stated that it was often used by cars (often only for a few minutes) and as a result, he has been obliged to double-park. In these situations he has been issued with PCNs but he claimed he had no alternative option.

Another deliveryman preferred to park his vehicle at the taxi rank and walk with his pallet to Fyfe Way because the "loading bay is never usable for loading / unloading".

- There should be better and greater communication with the parking attendants.
- Delivery drivers questioned think that the real problem does not appear when they load or unload, but whilst in transit on the M25 motorway.

6 RECOMMENDATIONS

The site visited illustrated the very local problem and the Borough would like to find sustainable solutions in order to facilitate urban freight distribution and reduce conflict and congestion in this specific area. It is for these reasons that the Borough is interested in creating better communication between the main urban freight stakeholders.

- Creation of a “5 minutes bay”, close to the taxi rank

During the forum, everybody agreed that one of the main problems was caused by cars parked for a short time on the loading bay. People at the forum also it would not be appropriate/workable to totally forbid cars from stopping for a very short time (due to the presence of the banks, take-aways, etc.).

Consequently it is suggested that a bay allowing “5 minutes parking” could be created between the entrance of Church Road and the taxi rank. Specific signage could be used on the road mark clearly the difference between the taxi rank and the new bay.

- Use private parking on Tetty Way

Some retailers share loading bays located in the private car park which can be entered from Tetty Way. The problem is that it is a private car park and some retailers based on High Street do not have an access to it. It could therefore be practical to negotiate wider access to a loading bay inside this car-park which could be used by all retailers. Indeed, as the loading bay located on Market square is shared by plenty of transport operators, this new one could be shared by different retailers when they need to load / unload or freight companies.

- Better communication with parking enforcers

Some retailers complained there was not enough parking enforcement on High Street and sometimes when parking attendants patrolled, they did not take into account or understand the difficulties encountered by some deliverymen trying to carry out their deliveries. Indeed when the street is busy, there are few parking options available. Moreover, during peak hours, since there is no loading bay, where loading and unloading are allowed, is often used by cars. The document produced by the FTA and the RHA “Loading / unloading code of practice” may be very useful for parking attendants and it could be widely disseminated to them.

In summary:

- Creation of a “5 minutes bay”, close to the taxi rank
- Use private parking on Tetty Way
- Better communication with parking enforcers

ANNEX A

Bromley Legal Loading Initiative Forum **February 28th 2007 – Bromley Civic Centre**

Present:

Benjamin Stephens, Interim Parking Services Manager, *Bromley Council*

Dave Chilver, Head of Traffic Engineering, *Bromley Council*

Allen Herve, CCTV Manager, *Bromley Council*

Arnaud Lagrange, Senior consultant, *TTR*

The forum

The forum took place February 28th at the Bromley Civic Centre. All retailers located on High Street, and some in Market Square were invited, but none of them came.

The aim of the forum was to provide an opportunity for us to provide a background to the Legal Loading Initiative project within the South London FQP www.southlondonfqp.com and what has been observed from delivery vehicle observation work on Market Square, assistance with PCN data and the consultation that has been done with retailers and the messages that have been communicated to TTR as a result of this consultation. Problems and issues have been discussed, and a range of solutions and recommendations has been considered towards the end of the forum.

After a presentation of the SLFQP made by TTR and a presentation of the observations / questionnaires to different stakeholders, recommendations have been proposed by TTR and discussed by all the attendees of the forum.

The forum was also an opportunity to watch extracts from CCTV footage and to observe illegal situations.

This note is a summary of the different ideas discussed and validated by the attendees.

Overview of the observations made during the on-street survey

i. general presentation of the site

The pedestrian High Street is mainly composed by medium/high-value retails. Primarily commercial vehicles deliver to the High Street.

Market Square is in a same times a transit road and a “business” road with different sorts of shops and services. As a result, it creates a contrast between the transit and the local business activities.

Indeed, shops located on Market square are different in comparison with those located on High Street: more services or take-aways are on Market Square. This observation is very important because lots of car drivers want to stop on the parking bay just to go to the cash machine or to buy food to take away. For them, the loading bay is very “useful”.

There have been no known recent accidents on this section.

On Market Square, there is only one loading bay which is used by taxis for the night (between 10pm to 3 am). Indeed, between those times, no stopping is allowed except for taxis (night-time deliveries are prohibited). Taxis operate on Thursday, Friday and Saturday evenings. A taxi rank is located on the North of High Street. As a result, there are 2 taxi ranks for the area.

As a result, all loading and unloading operations take place on the loading bay located at the entrance of the pedestrian zone on the North side of the market square. This bay is next to a bus stop. The loading bay measures nearly 5 meters long.

Indeed, as the High Street is totally dedicated to pedestrians and business activities, solutions had to exist for retailers to they receive goods in good conditions.

On the West side of the High Street, the big shopping centre “The Glades” allows to retailers located on that side to share loading bays. Deliverymen use the pavement to transport pallets from the loading bay to the shops. It can be difficult for them when the street is crowded.

ii. enforcement

The Borough uses CCTV to enforce the area and issue PCNs. However, in some cases, deliverymen are in the process of delivering to a store on the other side of the square which takes longer to do, are sorting out goods in the back of the vehicle or are in an unmarked delivery vehicle and the CCTV cannot see if loading/unloading is taking place and therefore issues a PCN by mistake. This could be avoided by having more on street enforcement that could investigate these situations further.

Signage warning that CCTV enforcement is in place on the delivery bay is needed as the restriction signage is not very prominent, cluttered and is regularly disregarded.

PCNs statistics show that the main part of the PCNs issued on the Bromley Market square is link with deliveries. Major parts of them are issued due to vehicles which are parked without loading or unloading.

During the peak hours, conflicts become more and more important between car drivers, freight vehicles and public transports. In the picture above, it is difficult for the car to leave the bay, which forces further deliverymen to find another place to load or unload.

Due to the illegal use of the loading for short times, sometimes deliverymen in operation have to double-park which creates congestion / unsafe situation on the Market Square.

Overview of the remarks made by different stakeholders
10 retailers have been questioned and 2 deliverymen.

The retailers’ responses about the problems that deliverymen - or themselves - can meet are very fluctuant. Indeed, retailers who can share loading bays from the Glades or from Tetty Way have no problems with deliveries. For the other ones, it is a long way to go from the loading bay to the shops on High Street and sometimes difficult when it is crowded.

Some retailers would like to open the street early morning for facilitate deliveries. Indeed, even if they think that the fact that the street is pedestrian, if it was opened on the morning it would make easier the work of the deliverymen.

One deliveryman has been questioned while he was operating. He affirmed that it is a “nightmare” to deliver goods using the loading bay. Indeed, it is often used by cars (even for few minutes) and as a result, he is obliged to double-park. The problem in that situation is that PCNs have been issued to him while he did not have other alternatives.

One another preferred to park his vehicle on the taxi rank and to by foot with his pallet till Fyfe Way because the “loading bay is never usable for loading / unloading”.

A better communication should be done to the parking attendants.

Deliverymen questioned think that the real problem does not appear when they load or unload, but on the M25.

Recommendations arising from the forum

- Creation a “5 minutes bay” close to the taxi rank

During the forum, everybody agreed on the fact that one of the main problems came from the cars which are parked for a short time on the loading bay. People of the forum also agreed with the fact that it could be not relevant to totally forbid the short stops for cars (due to the presence of the banks, take-aways, etc.).

As a result, a “5 minutes park” could be created between the entrance of Church Road and the taxi rank. A specific signage could be used on the road to make the difference between the taxi rank and that new bay.

- Use the private parking from Tetty Way

Some retailers share loading bays located in the private car park which entrance is from Tetty Way. The problem is that it is only private parking and some retailers based on High Street do not have an access to it. As a result it could be relevant to create a “public loading bay” which could be used by all retailers inside this car park. Indeed, as the loading bay located on Market square is shared by plenty of transport operators, this new one could be shared by different retailers when they need to load / unload or freight companies.

- Better communication for parking enforcers

Some retailers complained they was not enough parking enforcement on High Street / Market Square and when sometimes, when parking attendants operated, they did not think to understand the difficulties that some deliverymen met to deliver goods. Indeed, when the street is busy, there are no plenty of solutions to park their vehicles. Moreover, during the peak hours, as there is not loading bay, areas where loading and unloading is allowed, is often used by cars.

The document made written by the FTA and the RHA, which is called “Loading / unloading code of practice” may be very useful for parking attendants and it could be disseminate to them.