

Out-of-hours Deliveries in Central London

Final Report



Prepared for



by:



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Consultants' Statement

The views expressed within this report are those presented by stakeholders consulted during the study and of the consultant team, which undertook the project.

These are not necessarily the views of the Central London Freight Quality Partnership.

Similarly, the conclusions and recommendations presented within this report are those developed by the consultant project team.

Again, these are not necessarily endorsed by the Central London Freight Quality Partnership.

EXECUTIVE SUMMARY

This study was commissioned in November 2007 by the Central London Partnership, within the framework of the Central London Freight Quality Partnership, to investigate the issue of out-of-hours deliveries from a Central London, mixed-use perspective.

The key objectives of the project were to:

- Define the “market” of potentially interested sectors for implementing or increasing ‘out-of-hours’ delivery activity.
- Assess the level of awareness, existing use and potential for increasing ‘out-of-hours’ delivery activity
- Determine the drivers for operational change and the required changes to retail, transport and local authority practices required to accommodate increased use of ‘out-of-hours’ deliveries
- Determine factors to influence and encourage increased use of ‘out-of-hours’ delivery operations
- Identify potential barriers to greater uptake
- Identify locations/areas where an expansion of ‘out-of-hours’ deliveries would be suitable
- Make recommendations on the potential to pilot expanded ‘out-of-hours’ operations at specific sites, with named potential participants
- If applicable, make recommendations on further studies to be undertaken.

The term ‘Out-of-hours deliveries’ means not only deliveries made during periods of night-time restrictions, but also during other available non-restricted delivery windows, outside of normal opening hours.

Ultimately, this definition will have different meanings to individual businesses, depending on the nature of their operations. Off-peak hours will be different in a business area (for example in the City of London which is very lively during the day and quieter at night) than in a more predominant ‘leisure area’ (with pubs, restaurants, etc.), such as in Covent Garden or in the West End.

Primary aspects of this research involved gauging interest from public and private stakeholders and identifying potential sectors (including retail, hospitality and accommodation) and locations where out-of-hours delivery trials could take place. To narrow the focus of this remit, the client group decided that efforts should be focused on the Business Improvement Districts (BIDs).

Telephone and face-to-face interviews were used to discuss key aspects relating to out-of-hours deliveries with a range of private and public stakeholders: 22 businesses, 11 public organisations and 9 BIDs were consulted within the framework of this research.

Consultation offered an overview of the current delivery/servicing activities and current restrictions, as well as providing an indication of public and private sector views on the benefits and disbenefits of out-of-hours deliveries.

According to businesses and local authorities, out-of-hours deliveries allow:

- Operational advantages (reduction of disruption to normal trading conditions, more predictable journey times and projected arrival times for deliveries)
- Economic advantages (increased vehicle and driver productivity and fuel efficiency, improved customer service by having goods on shelves ready for opening)
- Traffic management advantages (easier and quicker access to delivery points using the road network at night, reduced congestion in and around stores at peak times, potentially safer deliveries due to reduced numbers of other road users)

A key finding from the study was that out-of-hours deliveries are already undertaken by many businesses within Central London, servicing premises where no planning or environmental health curfew restrictions currently exist.

There was general support from retailers and operators contacted during the study for relaxation of restrictions (planning and environmental health), to facilitate increased night-time delivery and servicing activity. There was also a view that this should be supported by a relaxation of the London Lorry Control Scheme (LLCS) to encourage rather than restrict night-time movements.

Two types of core delivery restrictions exist within Central London:

- Planning restrictions: imposed at the time of planning consent for development of premises. Delivery activity specific restrictions are often contained within a broader suite of restrictions on activities imposed. Historically these have been drawn from suggested restrictions contained within Planning Policy Guidance, developed and issued by central government.
- Environmental Health restrictions: normally in the form of Noise Abatement Notices, imposed at any given time, which are designed to preserve the quality of life of local residents.

In addition, the LLCS restricts the movements of goods vehicles greater than 18Tonnes maximum permissible weight within London, during the night and at weekends. LLCS is a permit scheme and requires the use of specified routes to accept premises. This means, in some cases, that the most direct access route cannot be used and a more circuitous route has to be taken to avoid key residential areas. The existence of this scheme has a potential impact on the effectiveness of 'out-of-hours' delivery activity within Central London, due to the possible need to travel further to reach the delivery destination than would be the case during the day.

In most cases, the reason why out-of-hours deliveries are prohibited in specific areas is noise-related. It has become clear that residents have significant influence over this issue, through their complaints to local Boroughs concerning disturbance during out-of-hours periods. In support of this, local authorities clearly express their core role of protecting the interests of their local residents.

A key finding of the study is that retailers who also operate their own goods transport in-house are likely to be more interested in 'out-of-hours' delivery activity than those who rely on supply chains controlled by third parties, including suppliers. These 'own account' operators/retailers can give their own drivers direct access to their own stores without concerns relating to store security. This is not generally the case for retailers using third parties to carry out deliveries and, therefore, their interest in the potential to increase 'out-of-hours' delivery activity (requiring store staff to be on site out of normal working hours) is more limited.

There is reluctance among some retailers and freight operators to change the profile of their delivery and servicing activity, preferring to continue to deliver during the daytime (including peak periods) and risking regular receipt of Penalty Charge Notices due to illegal loading/unloading, resulting from peak period competition for available loading/unloading bays.

In general, local authorities are keen to help facilitate increased out-of-hours delivery activity, provided noise emissions do not disturb local residents. In all likelihood, they see a requirement for dialogue to be based around industry-led solutions, such as driver training, on-site noise audits and remedial measures, vehicle specification and approved loading/unloading practice.

The key barriers potentially limiting 'out-of-hours deliveries' and the key measures necessary to mitigate some of these barriers and increase 'out-of-hours deliveries' in Central London have been identified:

- *Barrier:* Inevitable noise generated by loading and unloading operations. Even well managed 'out-of-hours' delivery operations will generate some noise, which is more audible, at night, against a quieter city background noise.
 - *Mitigation measures:* use of quieter equipment for 'out-of-hours' delivery operations (low noise vehicles, roller shutter doors, roll cages etc). Site-specific audit of facilities to accommodate 'out-of-hours' loading and unloading activity.
- *Barrier:* some goods are time-specific and need to be delivered within certain windows within the day.
 - *Mitigation measures:* improved co-operation between local authorities and businesses to review existing restrictions, particularly Environmental Health Department-imposed Noise Abatement Notices, as well as historic (and potentially no longer relevant) planning conditions.
- *Barrier:* lack of available staff to receive goods during non-trading times.
 - *Mitigation measures:* a variety of solutions for delivery of goods when no receiving staff are available (driver controlled deliveries, on-street airlockers etc).
- *Barrier:* security concerns, in terms of vehicle, driver and load safety at night and general store security.
 - *Mitigation measures:* Encouraging a strong partnership between the relevant local authorities, local businesses and the police, as well as dissemination of best practice and development of a portfolio of case study examples to

illustrate practical implementation measures, including a focus on safety and security, which work in a range of locations and situations.

The majority of stakeholders consulted during the study were in support of the development of a set of trials/pilot studies to assess, in practical terms, what could be done to increase 'out-of-hours' delivery activity.

Unfortunately, in most cases, the BIDs do not appear to be relevant areas, for the time being, to develop trials, as feedback has indicated that this issue is not a key priority at present. Many are keen to be kept informed of developments and, although unwilling to participate in pilot trials at this time, would potentially be willing to reconsider in the future.

Potential pilot participants were identified and confirmed through direct consultation:

- Commercial participant: Sainsbury's
- Local authority participants: London Boroughs of Camden, Islington and the City of Westminster.

Additional locations and potential commercial partners were identified by other local authorities. A subsequent list of potential stores has been developed and appears in the 'Recommendations' section of the report.

This list of potential trial sites could be investigated in further study work and subsequent trials could also be linked with other innovative urban freight initiatives, including consolidation centre feasibility study work (City of Westminster/Camden).

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1 INTRODUCTION & BACKGROUND

This research was commissioned by Central London Partnership (CLP) within the framework of the Central London Freight Quality Partnership (CLFQP), in November 2007.

1.1 The Central London Freight Quality Partnership

The CLFQP has been established by the Central London Partnership, with Transport for London, to facilitate urban freight distribution in the Central Boroughs of London (Camden, City of London Corporation, Islington, Royal Borough of Kensington & Chelsea, Lambeth, Southwark, and the City of Westminster).

It aims to bring together key stakeholders, including the Boroughs, freight operators, trade associations and other organisations, to consider local freight related issues and to help find local solutions to local freight transport problems.

Central London Partnership is the coordinator of the Central London Freight Quality Partnership.

Central London poses specific challenges for the efficient, economic, safe and sustainable movement of freight. The living heart of the capital is dependent on high quality delivery and servicing activity to ensure that residents and visitors have access to the goods they need at the right place, at the right time and in perfect condition. But this comes at a price and delivery activity within Central London has inevitable undesirable impacts in the form of noise, vehicle emissions, vibrations and visual intrusion.

As a retail, commercial and cultural hub, Central London attracts some 180,000 light goods vehicles and 60,000 heavy goods vehicles each day¹. As a result, a primary role of the Central London FQP is to identify and investigate measures to facilitate improvements in freight transport, ensuring the efficient movement of goods and services in Central London, whilst mitigating its adverse environmental and social impacts.

1.2 What is meant by 'Out-of-hours deliveries?'

For the purposes of this study, the term 'out-of-hours deliveries' means not only deliveries made during periods of night-time restrictions, but also during other available non-restricted delivery windows, outside of normal opening or operating hours.

'Out-of-hours' deliveries could potentially play a role in improving the efficiency, safety and sustainability of freight transport within London, through:

¹ Central London Freight Quality Partnership, 2007.

- Improved **productivity** (vehicles can access delivery points more quickly and easily in less congested traffic, resulting in better use of drivers' time and the potential for improved vehicle utilisation)
- **Environmental** benefits (vehicles spend less time sitting in traffic at peak periods, with engines idling, resulting in less fuel being consumed and less vehicle emissions being produced)
- **Social** benefits (less heavy vehicles on the road during normal daytime hours results in a range of improvements for local communities, including less visual intrusion, improved local amenity and reduced risk of accidents involving HGVs).

1.3 Project aim and Key project tasks

The fundamental aim of this study was to assess the potential for increasing 'out of hours' delivery activity within Central London.

The programme of work, agreed with the client group, included the following critical tasks:

- Assess the level of awareness, existing use and potential uptake amongst retailers, freight operators, local authorities and other interested stakeholders to understand the current and possible future role of 'out-of-hours' deliveries in operations,
- Identification of the locations/areas where an expansion of 'out-of-hours' deliveries would be suitable and analyse existing activity and understand the potential benefits and barriers, from the point of view of all parties concerned, relating to increased 'out-of-hours' delivery activity and a potential trial. This will involve site-specific assessments,
- Define the "market" of potentially interested sectors for implementing or increasing 'out-of-hours' delivery activity and potential pilots,
- Determine the drivers for operational change,
- Determine the required changes to retail, transport and local authority practices required to accommodate increased use of 'out-of-hours' deliveries,
- Determine factors to influence and encourage increased use of 'out-of-hours' delivery operations,
- Identify potential barriers to increased uptake,
- Make recommendations on the potential to pilot expanded 'out-of-hours' operations at specific sites, highlighting short and long term obstacles and suggesting measures to both mitigate these obstacles and help improve the economy, environment and quality of life,
- Make recommendations on further studies to be undertaken, including presentation of a timetable for a local pilot study.

The project commenced in November 2007 and was completed mid-February 2008.

2 METHODOLOGY

2.1 Agreed approach and Methods used

A methodology was proposed by TTR and validated by the client group at the start of the project.

The project client group consisted of Central London Partnership and Transport for London (Freight Unit).

The project officially started mid-November 2007 and was agreed to be finished mid-February 2008.

A kick-off meeting took place on November 9th 2007, providing focus on the exact scope of the project and the agreed programme of work.

Two update meetings took place on December 17th and January 21st to discuss progress with the consultation elements of the study.

An initial draft report was discussed at the second update meeting and a draft final report was submitted to Central London Partnership on February 11th for circulation to members for comment.

In order to focus the scope and boundaries of the project, it was decided by the client group that TTR should specifically focus consultation on stakeholders within or with an interest in the Business Improvement District (BID) areas of Central London. It was also agreed that other areas in Central London could also be considered if identified during the course of the research.

The methodology used to meet the requirements of the study was based on three main stages:

- **Initial Desk-based research**

There was a specific request from the client group to ensure that the desk based research element of the study remained focused and streamlined, avoiding researching and presenting excessive amounts of background information. The information obtained from the desk-based research was to deal with out-of-hours deliveries, night-time deliveries and out of peak hour deliveries.

Desk based research and literature review was expected simply to provide brief context for the final report.

- **Consultation with identified stakeholders and data analysis**

The main focus of the consultation consisted of questioning the key stakeholders within the study area, potentially with an interest in out-of-hours deliveries. A list of initial key contacts was provided by Central London Partnership and added to by TTR using its own contacts and others identified during the course of research.

Phone and face-to-face interviews were used to carry out primarily qualitative research to discuss out-of-hours deliveries with private and public stakeholders: 22 businesses, 11 public organisations and 9 BIDs were consulted within the framework of this research in order to clearly understand their views, aims and aspirations relating to 'out-of-hours' deliveries and what changes would need to be done to carry out further 'out-of-hours' delivery activity.

Consultation was carried out by TTR², using a semi-structured questionnaire³ to gauge the thoughts from key stakeholders and to try to identify potential hotspots and possible mixed-use locations suitable for 'out-of-hours' deliveries pilots.

The discussion guide developed by TTR to question stakeholders focused on the following key aspects:

- Where is the business located?
- What currently happens with deliveries?
- Would out-of-hours deliveries be useful?
- Why do out-of-hours deliveries not currently happen?
- What would need to change for out-of-hours deliveries to happen?
- Would the business be interested in being involved in a trial?

Responses to the consultation activity were analysed in detail to identify key issues, drivers and barriers and to assess which public and private stakeholders would potentially be suitable to participate in subsequent pilot studies.

- **Reporting and recommendations**

Following the analysis phase of the study, recommendations were developed and incorporated in a study report.

TTR presented an initial study report at the progress meeting on January 21st 2008 and then a draft final report was submitted on Monday 11th February 2008 for review and final sign off on Friday 15th February 2008.

2.2 The Nature of the Study area

The study area covers 7 boroughs in Central London: Camden, City of London Corporation, Islington, Royal Borough of Kensington & Chelsea, Lambeth, Southwark and the City of Westminster.

This area is very much the heart of Greater London, characterised by a high density of population and commercial activity.

It is an area with an important night-time economy (theatre, clubs, pubs, etc.) which needs to be considered when assessing the potential for increased night-time delivery activity.

² The consultation ran between November 26th 2007 and January 23rd 2008.

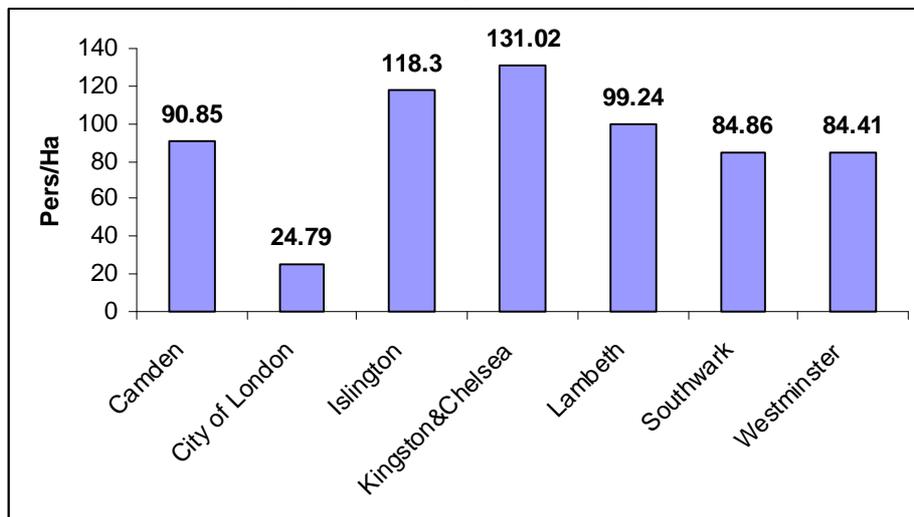
³ The discussion guide is contained within Appendix 3.

On the one hand, a local night-time economy is a positive, meaning night-time deliveries would be additional to an already existing background of night-time activity.

On the other hand, a local night-time economy can be a drawback for increased night-time deliveries due to the potential risks of delivery and servicing vehicle conflict with pedestrians and other road users. One of the general advantages of night-time deliveries carried out in locations without vibrant night-time economies is, quite simply, the lack of people on the streets when delivery and servicing is underway. This is not necessarily the case in certain locations within Central London.

An assessment of population density shows that some boroughs have a more important concentration of the population than others (Royal Borough of Kensington & Chelsea, Islington) while others, particularly the City of London, are more predominantly commercial, with less residents.

Figure 2.1: Density of population in the Central London boroughs (Residents per Hectare)

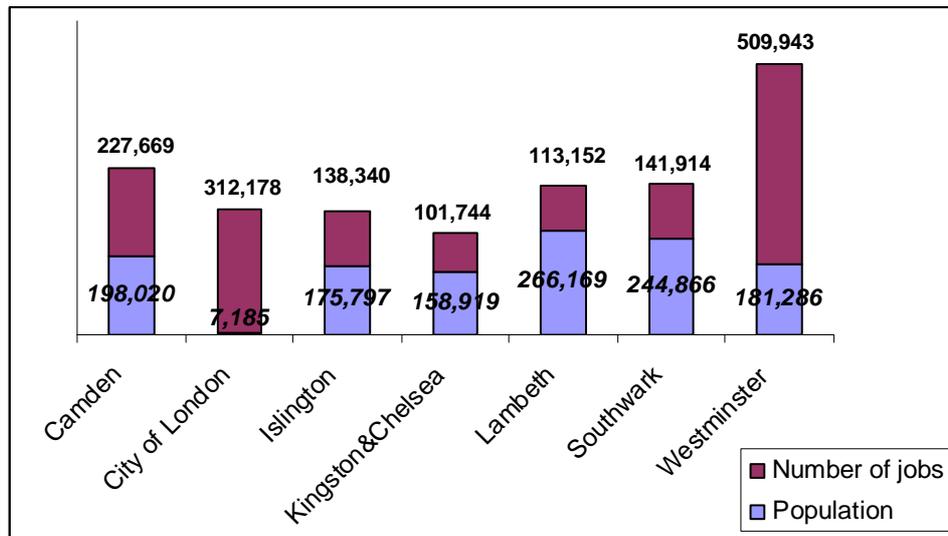


Data from the Office for National Statistics, 2001

The majority of employment in Central London is mainly concentrated in the boroughs of Camden, the City of London Corporation and in the City of Westminster.

We can also distinguish key residential areas, with a high density of residents and a comparatively reduced volume of employment.

Figure 2.2: Resident Population and Number of Jobs in the Central London Boroughs



Data from the Office for National Statistics, 2001

It is felt that this residential/commercial profiling could be of use when identifying potentially suitable locations for any subsequent out-of-hours delivery pilots.

On the one hand it would be logical to pursue pilot activity in Boroughs and at specific sites where residential use is less and commercial use is greater.

On the other hand, the purpose of pilots is to trial initiatives and, particularly with the impact of 'out-of-hours deliveries' being felt most strongly by local residents, an approach which attempts an 'out-of-hours' pilot in a heavily residential location in a dominantly residential Borough could lead to robust conclusions.

3 POLICY CONTEXT

One of the oldest applications on record of 'out of hours deliveries' was implemented in Ancient Rome when Julius Caesar introduced an edict banning commercial deliveries during the daytime⁴.

In London, an experiment of delivering within the city during 'out of peak' hours was conducted in 1968⁵. Little information was provided by this implementation but the fact still remains it indicated that loading and unloading operations during the off-peak hours were successful when:

- vehicle operators achieve scale economies when they deliver in the off-peak hours
- shippers and receivers derive a real benefit otherwise they would opt out and request daytime deliveries
- off-peak deliveries can also be beneficial from the societal point of view.

3.1 The European context – Noise Policy

In 1998, the European Commission mentioned in its Noise Policy that at night, more than 30% of the European population are exposed to noise levels exceeding 55dB(A). This includes all kinds of noise, not just from delivery and servicing activity and the estimated cost of damage is between £8.6bn and £25bn per year⁶.

In 2003, the European Commission developed a new framework for noise policy on the basis of shared responsibilities across the EU at national and local levels. This included measures to improve the accuracy and standardisation of data to help improve the coherency of different action.

After 20 years of EC environmental noise policy legislation and technological progress, the noise from individual cars has been reduced by 85% since 1970 and the noise from lorries by 90%⁷.

It is also worth mentioning that, in accordance with the Aarhus Convention, the European Commission requires member states to inform and consult the public on issues relating to noise exposure, its effects and the measures considered to be effective in addressing noise. Competent authorities are required to draw up action

⁴ Dessau calls it the "*Lex Iuliana Municipalis*" on the basis of references in Cicero's correspondence to a comprehensive law of Caesar's which dealt with municipal affairs.

⁵ Churchill JDC, 'Operation Moondrop: An experiment in out-of-hours goods delivery'. The Urban Movements of Goods, 1970.

⁶ This calculation mainly integrates the housing value lost, the average time spent away from one's home where noise can be a problem, the noise-energy emission, the impacts of the productivity at work for residents disturbed by noise, etc.

⁷ Future Noise policy, European Commission – Green paper, Brussels, 1996. This calculation mainly integrates the housing value lost, the average time spent away from one's home where noise can be a problem, the noise-energy emission, the impacts of the productivity at work for residents disturbed by noise, etc.

plans to reduce noise where necessary and maintain low noise levels, where they exist.

Noise is therefore a key issue, considered at the European level and processes exist to ensure Member States protect the interests of their residents and limit their exposure to excessive noise.

3.1.1 The National, Regional and Local contexts

At a local level, each individual borough decides on their own delivery curfews through planning and environmental health restrictions. Local planning and environmental health restrictions exist to protect residents from noise disturbance and in such cases loading and unloading activity is generally prohibited between 10pm and 7am.

Across London, these planning and environmental health restrictions limit the time of day that a retailer can take delivery of goods. Delivery curfews are usually put in place to prevent night-time noise disturbance to residents and are more common in London than elsewhere in the UK⁸. This reflects the fact that residents often live closer to retail stores in London than in other locations. These residents are, therefore, at greater risk of noise disturbance due to retailers' operations.

Throughout the Greater London area, in addition to the 'yellow lines' managed by local authorities, Red Routes, designed to keep key arterial routes clear of parked vehicles, have their own rules. Red routes carry approximately one third of London's traffic, every day, are managed by Transport for London and enforced by the Metropolitan Police.

In order to help local authorities facilitate night-time deliveries, the Department for Transport (DfT) published, in 2005, "*Delivering the goods: a guidance on delivery restrictions*", which aims to give support to local authorities to put in place delivery restrictions and to encourage subsequent responsible enforcement of restrictions.

Accompanying this guidance, "*Delivering the goods, a toolkit for improving night-time deliveries*" was published by the Freight Transport Association (FTA) which aims to assist in the set-up of pilot out-of-hours delivery trials, adhering to best practice, that would not adversely affect residents but would benefit the environment, help to relieve traffic congestion, improve safety and make operations more efficient.

Considering the potential advantages of night-time deliveries as well as the potential key barriers to 'out-of-hours deliveries', this toolkit highlights the importance of understanding the role of local authorities in protecting the interests of local residents.

From a pan-London perspective, Transport for London (TfL) spending priorities for 2006/07 indicated that *night-time deliveries* are one of the criteria for appraisal. TfL mentioned that proposals would be welcomed for trials at locations where night-time

⁸ British Retail Consortium, November 2001, *Delivery Curfew Survey Results*

deliveries could be undertaken, with a particular emphasis to be given to town centres, local centres and interchange locations.

The London Freight Plan⁹ (LFP), which was published by TfL in December 2007, encourages the development of the concept of out-of-hours deliveries within the Greater London area.

The LFP mentions, for example, that *'The delivery of fuel at night appears to have some significant benefits given the potentially hazardous nature of the product and the overall demand for road space'*.

The London Delivery and Servicing Plans (DSPs), key components of the LFP, will be used to increase availability and use of safe and legal loading facilities and to assess the potential, at specific sites, for out-of-hours deliveries.

3.1.2 The London Lorry Control Scheme

In Greater London, the London Lorry Control Scheme (LLCS) manages the movement of HGVs with a maximum permissible weight (MPW) in excess of 18 Tonnes along agreed routes where travel within the area of the control is kept to a minimum¹⁰. The scheme, which operates using permits, is managed by London Councils¹¹.

Any initiative wishing to increase the intensity of 'out-of-hours' delivery activity needs to be mindful of the potential impact of the LLCS, the potential effects on local residents and the realistic commercial implications for retailers and vehicle operators.

The LLCS can have an impact on night-time deliveries as it can mean additional mileage run to avoid a restricted route between two points, during the hours of the restriction, which would not otherwise be restricted during the day.

When consideration is given to the potential extra costs to be incurred by operators/retailers from measures deemed necessary to undertake night-time deliveries - special handling equipment, vehicle 'whisper' kits and training for delivery and receiving staff – there may be overall limited net commercial benefit in changing operations. This is particularly the case where an operator may have to travel additional mileage on a circuitous route to reach a delivery point at night, in accordance with the London Lorry Control Scheme, which would not be the route used during the day during normal operating conditions.

There is a view from the retail sector that London Councils could have a role to play in facilitating increased out-of-hours deliveries, given that they have the responsibility

⁹ The LFP supports the sustainable development of London and complements the freight proposals set out in the Mayor's Transport Strategy.

¹⁰ See the constraints imposed by the London Lorry Control Scheme in Appendix X.X.

¹¹ London Councils is the local government association for London, bringing together representatives of the 32 London boroughs and the City of London Corporation.

for administering and enforcing¹² (and ultimately, reviewing, revising or relaxing) the London Lorry Control Scheme. However, London Councils' view is that restrictions on night-time deliveries are still appropriate even if longer trips have to be made.

3.2 Environmental & economic contexts

3.2.1 Environmental impacts

According to the Department for Transport, it is predicted that by 2026, freight movements may grow by as much as 15%, with ever increasing demand for available road space.

It is widely recognised, within both government and industry, that the benefits of night-time deliveries could result in:

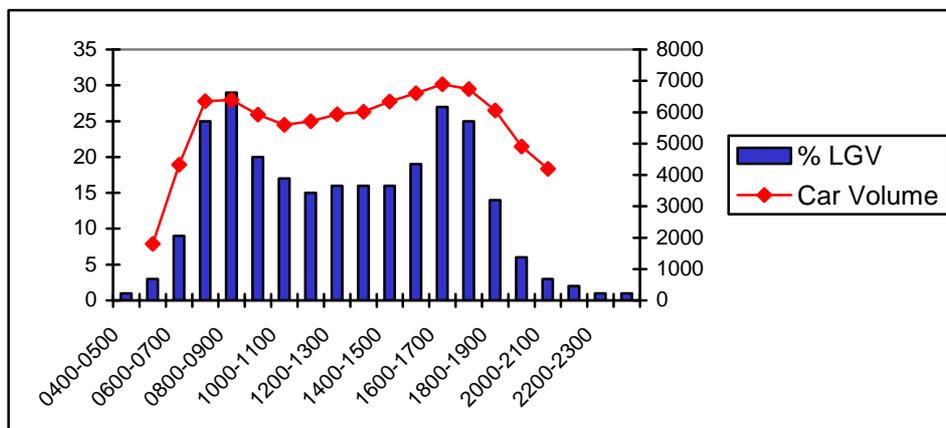
- Reduced congestion
- Reduced vehicle emissions and CO₂
- Improved use of transport network capacity
- Improved freight transport efficiency.

As a result, and in order to gain a better knowledge regarding night-time deliveries, a British Retail Consortium survey¹³ was carried out with selected major retailers (166 stores). Among them, 70 were subject to night-time deliveries curfews and only 14% of deliveries were currently made 'out of hours' (10pm to 7am).

In terms of environmental impacts, the survey showed that if 50% of restrictions were removed, then 150,000 vehicle miles would be saved, leading to 52,000 litres of fuel saved, a reduction of 140 tonnes of carbon dioxide and 45 kg of sulphur dioxide less.

It is worth noting that the peaks of Light Goods Vehicles (LGVs) and cars appear at rush hours; therefore, ideally, the use of LGVs would be spread throughout the day/night to diminish congestion and increase the drivers' quality of work and productivity.

Figure 3.1: LGV and Car Volumes throughout the day in Central London



Transport for London, 2007

¹² In 2007, London Councils employed a team of five officers to enforce the ban.

¹³ British Retail Consortium, Delivery curfew survey, 2005.

In earlier research, The University of Westminster¹⁴ confirmed the idea that relaxing time restrictions could also result in environmental benefits. Vehicles could travel at a more constant speed because of less congested roads, as well as potentially travelling shorter distances. These effects would reduce fuel consumption and carbon dioxide emissions.

3.2.2 Economical impacts

At a **European level**, an IVECO survey¹⁵ showed that the traffic flows of different relevant European cities have been analysed and that a reduction of over 2 minutes per km can be achieved by freight travelling during the night.

As a result, productivity can be improved, as the UK trial involving Wandsworth Council and Sainsbury's illustrates (section 3.3.3, page 15).

Fuel consumption could drop by between 2.1% to 4.2% compared with freight transport during the day.

In the **United Kingdom**, Marks & Spencer has confirmed during public presentations delivered through BESTUFS (Best Urban Freight Solutions) that it sees potential positive commercial impacts from 'out-of-hours deliveries' such as:

- reducing demands on backstore storage space
- offering staff improved flexibility of work
- improved use of equipment (including vehicles and handling units)
- overall operating cost reductions

In terms of logistics benefits, as figure 3.2 below shows, there is conflict between rush hours and planned delivery times, impacting on the productivity of vehicles, drivers and other staff.

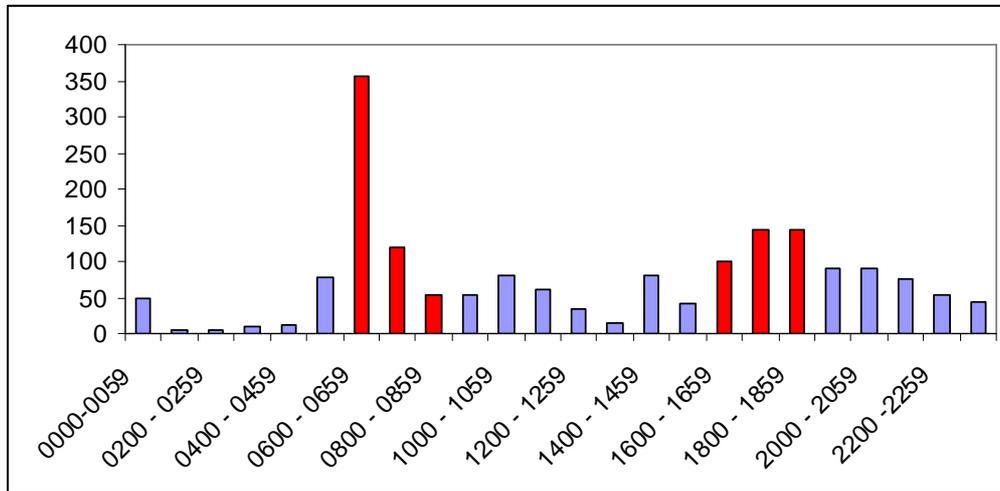
Marks & Spencer feel that increased 'out-of-hours deliveries could mean potentially less peak traffic and faster average road speeds; but also, from their own strategic perspective, they could potentially result in a reduction of their fleet size and improved fuel consumption¹⁶.

¹⁴ University of Westminster, Night-time delivery restrictions: a review, 2005.

¹⁵ Key results from an IVECO survey, 2002.

¹⁶ Presentation made by Mark-&-Spencer, BESTUFS workshop, Budapest, 2003.

**Figure 3.2: Weekly Delivery Time Profile to Marks & Spencer Stores
(in red, periods of congestion)**



M&S for BESTUFS, 2003

At a **London-wide level**, delivering during the peak hours (periods of congestion) has a direct impact on the time taken (and therefore the cost) to deliver. In 2000, the Department for Transport analysed the cost of congestion on the local economy. The study showed that in Central London, the dense roads and high concentration of traffic controls meant that, even at night, almost 25 per cent of time is spent at speeds less than 8 km/h. By comparison, during weekdays almost half the time is spent at less than 8 km/h and less than 10 per cent at speeds above 40 km/h. Although both daytime and night-time figures illustrate the impact of congestion on road speeds, there is a significant improvement (i.e. less time spent at a lower speed) at night.

Operationally, this could mean, subject to LLCS restrictions, that vehicles access delivery locations more quickly, carry out their necessary delivery/servicing activity and then become available for other tasks earlier than their daytime counterpart would.

This improved efficiency and the potential for increased vehicle utilisation and driver productivity could have a positive effect on overall operating costs, even taking into account the likely increased wages paid to staff for night-time working.

3.2.3 Social benefits

As mentioned in sections 3.2.1 and 3.2.2, 'out-of-hours deliveries' allow operations to take place when there is less congestion on roads and less pedestrian traffic on pavements. This has direct potential safety benefits in terms of reducing conflict with pedestrians and other road users, except, perhaps, in those areas of Central London with particularly vibrant night-time economies).

The potential social benefits of 'out-of-hours deliveries' could help the Mayor's commitment to improve road safety and to extend activities beyond traditional hours in suitable locations¹⁷. Indeed, the London Road Safety Unit aims by 2010¹⁸ to:

- reduce by 50% the number of people killed or seriously injured
- reduce by 50% the number of cyclists and pedestrians killed or seriously injured
- reduce by 40% the number of powered two-wheeler users killed or seriously injured.

Reductions in loading and unloading operations during daytime peak hours can allow improved access to premises for local residents and improve local amenity, through reduced visual intrusion caused by HGV presence and activity adjacent to residential locations.

Out-of-hours deliveries also offer the opportunity for greater availability of products within local retail outlets, due to improved servicing efficiency.

3.3 Best practice around Europe

Across Europe, research and trials have been undertaken, revealing the interest and enthusiasm from the public and private sectors for this issue.

3.3.1 General observation

In various cities across Europe, delivery and collection activities take place throughout the whole day and during the weekends. Similar to the UK, it is the noise generated by night-time deliveries which causes problems.

High noise levels are mainly caused by factors independent of direct vehicle operations, such as goods handling, the opening and closing of store doors etc.

However, technical innovation and behavioural solutions can be implemented, to reduce noise: measures include low noise vehicle specification or modification, use of quieter roll cages, education of drivers and staff.

Paris is one example of a city, which proactively encourages night-time deliveries. Indeed currently night-time deliveries are allowed in Central Paris between 10pm and 7am for all vehicles of less than 43m². The Mayor is planning to change those restrictions in order to only allow loading and unloading operations for quiet vehicles. At the moment, the City of Paris is working with private stakeholders and freight transport associations to define the concept of 'quiet vehicles' and indicators.

3.3.2 The Dutch case

In the Netherlands, the PIEK Programme coordinates involvement from businesses, local and national authorities to reduce noise from loading and unloading activities.

¹⁷ Greater London Authority, *Late Night London*, June 2002.

¹⁸ London Freight Plan, December 2007.

It focuses on 'out-of-hours deliveries', specifically relating to the key issue of noise disturbance for local residents.

The project started at the end of 1998 when the "Decree - Retail Trade Environmental Protection" came into effect.

This Dutch decree declares that the noise emissions generated when loading and unloading goods, specifically by trucks, between 7pm and 7am, must comply with strict standards and noise limits.

In 1999, the programme set out to address the critical technical aspects of night-time deliveries and began to subsidise acquisition of quiet vehicles and equipment.

The Dutch government strongly believed in tackling noise problems at the source. But it also felt it was essential to tackle these problems on a European level as it thought it unlikely that truck manufacturers would develop an ultra-low noise truck specifically for the Dutch market.

In 2001 it became clear that, from a technical standpoint, it was possible to meet stricter noise limits for goods vehicles.

To make vehicle and operational changes economically viable for operators, the Dutch Department of Environment agreed to support transport operators wishing to invest in quiet equipment, in the form of subsidies.

At the same time, because of the increased flexibility resulting from being able to deliver goods in the morning/late in the evening, a number of transport operators decided to invest in quiet vehicles.

The PIEK programme reports some significant potential benefits from operators deciding to invest in quiet equipment and, therefore, being permitted to perform urban operations during the evening/at night, including:

- If transport operators deliver between 7pm-7am on an average basis, they will save daily 1.5 hours time which would otherwise be spent in congestion,
- If a city decides to relax restrictions and encourage deliveries in the morning/at night, the projected number of fatal road accidents could be reduced,
- People living close to retail units should not suffer from sleep disturbance because night deliveries are only allowed with quiet equipment.

3.3.3 The British case

In the United Kingdom, a new quiet night-time delivery scheme was created in 2007 which was the result of collaboration between the Noise Abatement Society (NAS), the Dutch PIEK programme, the Freight Transport Association and Dublin University.

This project aimed to ensure that the general public would be fully protected from potential night-time disturbance of extended delivery hours.

In the UK, some previous trials failed because of a lack of control over quiet delivery practices, as well as from a lack of communication between the freight operators/retailers and local authorities.

As a result, an eight week trial was set up in the London Borough of Wandsworth (Sainsbury's Garret Lane Store, South London FQP area). Prior to the trial, the potential noise problems at the delivery point were identified and new equipment was introduced, fitted and paid for by the retailer/operator (Sainsbury's) both at the store and for those vehicles involved in the trial.

The Noise Abatement Society proposed a free 24-hour noise complaint line, the number for which was clearly displayed at many prominent places around the store involved in the trial, at the delivery points and on the sides of the participating vehicles. This allowed complaints from the public to be evaluated and acted upon immediately.

Wandsworth Council agreed to extend the relaxation in the night-time delivery restriction for a further four weeks in order to fully evaluate its effectiveness following installation of additional noise reduction equipment at the delivery point.

This trial was deemed a success due to positive communication and collaboration between the main stakeholders: Wandsworth Council Noise Team, the Noise Abatement Society and Sainsbury's Store Manager, staff and executives.

This '*Silent Approach*' scheme is a close partnership between Local Council, NAS and participating store/operator.

Results of Wandsworth trial Oct-Dec 2007 at Sainsbury's Garret Lane Store

- Reduction of 8-10Db of maximum noise unloading
- Lorry journey time reduced by 60 minutes on round trip.
- Driver hours saving of 2 hours per day equal to 700 hours per year = saving of £16,000 per year.
- Trial took 2 journeys off road during congested time of day = 700 vehicle journeys per year.
- CO2 reduction equates to over 2 tonnes reduction over 1 year.
- Saving of 700 litres of fuel (this figure may improve after full analysis is completed)
- Average night-time turnaround at delivery point = 78.6 minutes compared to 115.8 minutes during day.

Sales

- Average sales 2-3% above budget; during trial that rose to 5-6% above budget.
- Productivity gain on night-time activity during trial = 15%

- Product availability improved
- Customer feedback is reported as 'great' as produce is available from opening time. Also feedback about the in-store advertising of 'quiet delivery' is appreciated and interpreted as customer care.

Noise Abatement Society, 2008

These best practice case study examples from across Europe and within the UK illustrate that effective night-time delivery activity is achievable, under agreed guidelines, meeting the requirements of residents, local and national authorities, retailers and operators and can ultimately lead to significant financial and environmental benefits.

4 RESULTS OF CONSULTATION

Consultation with the main stakeholders was undertaken between the end of November 07 and mid-January 08.

The Christmas period had an observable impact on this work, as many stakeholders were busy, difficult to reach or unable to allocate time for interview.

This consultation aimed to gauge the interest from all stakeholders in 'out-of-hours deliveries' but also to:

- identify current restrictions
- identify what currently happens in their area and/or business sector,
- what they think about the concept of 'out-of-hours deliveries' (advantages and key barriers)
- what they would expect in the future regarding this issue.

The stakeholders contacted were:

- 9 Business Improvement Districts
- 22¹⁹ businesses were approached and consulted, including 17 retailers/freight operators and 5 industry associations
- 11 public sector organisations²⁰, including London Boroughs

Research for the identification of potential pilot locations has been done not only throughout the BID areas but also throughout Central London boroughs (Camden, City of London Corporation, Islington, Royal Borough of Kensington & Chelsea, Lambeth, Southwark, and the City of Westminster).

It is important to note that stakeholders highlighted the fact that the local context of Central London is very different to that of the rest of London and endorsed a bespoke approach for dealing with 'out-of-hours' deliveries within the heart of the capital.

4.1 The Business Improvement Districts

This research concerns the area of Central London and it was decided by the client group that particular focus should be made on the Business Improvement District (BID) areas.

Nine BIDs were approached:

- Angel BID
- Better Bankside

¹⁹ Alliance Boots, Borough Market, British Retail Consortium, Clean linen Service, Clipper Logistics Group, E-stop, FTA, Greggs Bakery, Holland & Barrett, IGD, John Lewis, London Forum of Amenities and Civic Societies, Sainsbury's, Superdrug & Savers, CSB Logistics, DHL Excel, Wincanton Logistics, Noise Abatement Society, Unichem, Thornton's plc., Fentiman Arm (restaurant), Hotel 87.

²⁰ City of London Corporation, French Embassy in the UK, Islington FQP, London 2012, London boroughs of Camden, City of Westminster, Kensington & Chelsea and Southwark, London Councils, London Development Agency, University of Westminster.

- Camden Town Unlimited
- Heart of London Business Alliance
- London Bridge
- New West End Company
- Paddington BID
- The Holborn Partnership
- Waterloo Quarter Business Alliance.

The decision was taken to approach the BIDs due to the fact that they have privileged links with the businesses in their area.

BIDs are public-private partnerships, in which property and business owners of a defined area elect to make a collective contribution to the development, marketing and promotion of their commercial district.

They were considered a good target audience for consultation and potential trials, as they are defined and coherent areas, following the same strategy of development.

Each BID was approached and more detailed face-to-face and telephone interviews were carried out with some.

For all of those BIDs interested in an increase in local 'out-of-hours' deliveries, a detailed analysis has been done, focusing on the following elements:

- Market segmentation of the BID area
- Background from the consultation with BID managers.
- Estimation of the potential for success of Out-of-hours deliveries and the detailed location of any potential pilot study.

It should be noted that, in terms of providing a detailed residential/commercial profile for each BID, this was not possible as information was only found to be available on a Borough level (as presented earlier in this report), rather than at a BID level.

4.1.1 BIDs potentially interested in 'out-of-hours' deliveries

4.1.1.1 *Angel BID*

(Borough of Islington)

Angel BID area is mainly composed of restaurants, pubs, offices and small businesses. The BID is, in principle, interested in the concept of local 'out-of-hours' deliveries. It was confirmed that, at this time, they would not consider being involved in a pilot study but would be happy to work with their local authority (Islington) on the issue in the future.

4.1.1.2 *New West End Company*

(City of Westminster)

The New West End Company covers the area of Bond Street, Oxford Street and Regent Street, which are the key shopping areas in Central London; the businesses in this area are predominantly retail outlets.

New West Company focuses on three main programmes: operations, environment and marketing.

It is recognised that delivery and servicing activity is crucial for the BID area and a clear strategy is essential.

The BID recognises the potential advantages of 'out-of-hours' deliveries, particularly in terms of less vehicles on the street at peak time and therefore less congestion.

However, in reality local businesses would need to be convinced about the benefits of out-of-hours deliveries (economic advantages would be the most powerful incentive).

Some of the bigger retailers and department stores might be interested in having 'out-of-hours' deliveries as they receive 2/3 deliveries per day (although they have not directly consulted these local members on this subject and no has approached them about this).

Different streets have different requirements (e.g. Regent Street and Bond Street are diversely different); as a result, different solutions would need to be found for the variety of goods transported. It is interesting to note that one landlord in the area²¹ was considering ways of improving freight deliveries and contemplated setting up a dedicated delivery operation for the area.

According to the BID manager, there is a need for a clear strategy covering freight operations.

It is interesting to note that the New West End Company would be interested, in principle, in being involved in a potential pilot but this activity would not specifically be within its current remit.

It was mentioned that they intended to recruit for a post in 2008 to work on delivery issues; the local 'out-of-hours' deliveries issue could be a part of the remit for the appointed person, particularly if conclusions from this research show a specific interest from retailers.

4.1.1.3 Waterloo Quarter Business Alliance

(Borough of Lambeth, there are current elections to expand the BID area into Southwark)

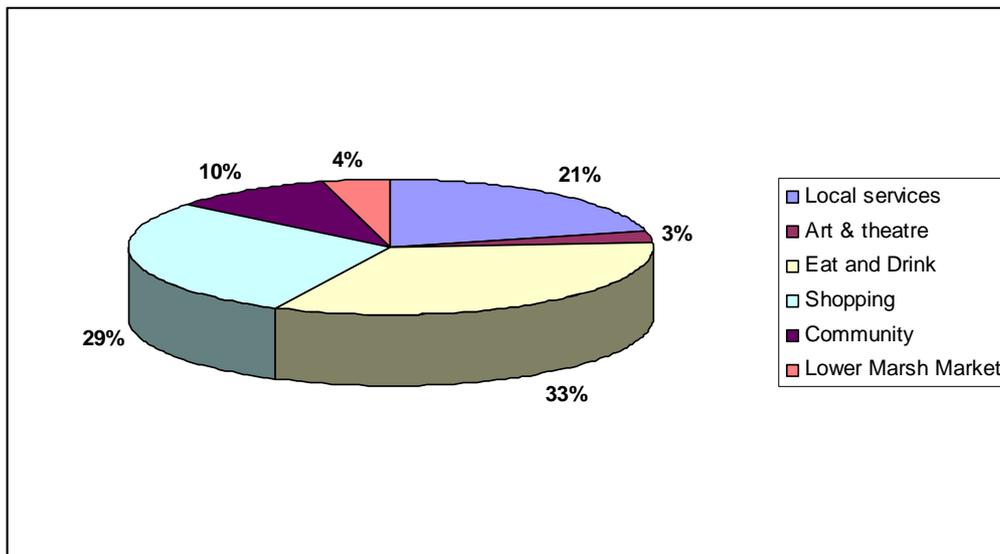
The majority of the BID area consists of restaurants, local services²² and shopping. These are predominantly small businesses and non-franchised.

According to the BID, it is quite difficult to gauge the interest of small businesses on an issue such as 'out-of-hours' deliveries, as they directly receive their goods from their suppliers without being involved in organising transport.

²¹ Crown and Steale.

²² By 'local services' it is meant all stores which do not sell goods but provide services (dry cleaner, solicitors...). Hotels and restaurants are included in the 'eat and drink' category.

Figure 4.1: Waterloo Quarter Business Alliance – Segmentation market



Data: Waterloo Quarter Business Alliance, 2007

An article on this CLFQP ‘out-of-hours’ delivery study was included in the BID January e-brief to member businesses and the BID Manager confirmed the issue would be discussed with a small selection of Waterloo Road businesses to gauge their interest.

The BID feels it unlikely that out-of-hours deliveries would develop an immediate interest among their members, as they are mainly small businesses and would be concerned about the potential staff costs involved in receiving goods out of normal operating hours and would be unwilling to provide suppliers/freight operators with store keys to enable ‘driver controlled deliveries’.

However, the BID would be interested in being involved only if there was an expressed interest from their members regarding this issue and if the results of this research were positive.

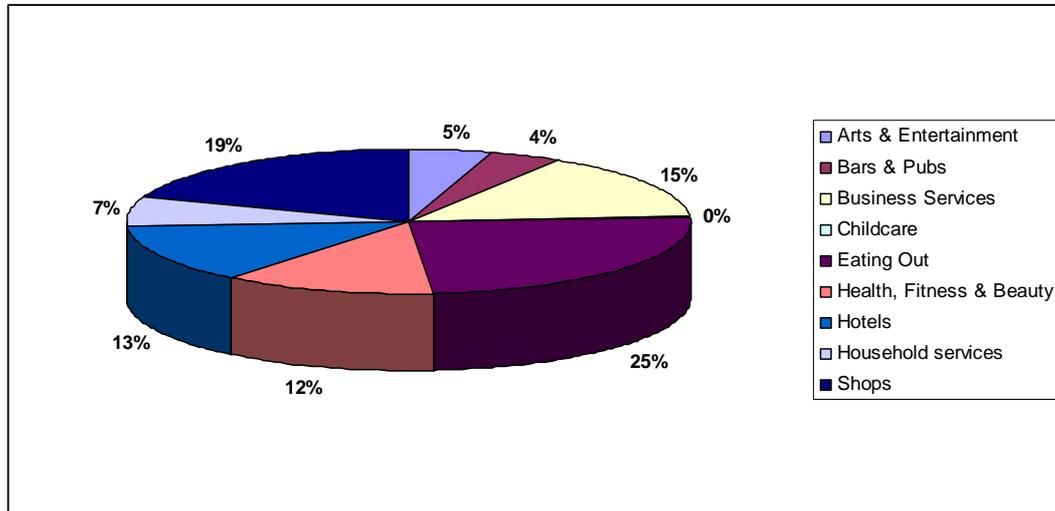
4.1.1.4 Paddington BID

(City of Westminster)

The composition of the Paddington BID, which covers a comparatively small area, is 350 businesses, 93 of which are hotels (including Hilton Metropole), 65 street cafes, restaurants, 14 pubs, 1 casino, and 114 shops/retails. The majority of these shops are small and independent, with very few big names.

This area is mainly considered a place where people come to eat and sleep and then use the transport network (via Paddington station, including travel to Heathrow airport).

Figure 4.2: Paddington BID – Segmentation market



Data: Paddington BID, 2007

Paddington BID is interested in an increase in ‘out-of-hours’ deliveries but is not keen to commit to participating in a pilot at this early stage.

The BID manager expressed interest in such a scheme but at the same time suggested that other issues are of much greater priority, such as the perceived negative impact of road pricing/congestion charging inside Central London.

According to Paddington BID, the concept of ‘out-of-hours’ deliveries is interesting, particularly if it is linked with new systems to deliver goods if no staff are available on site, in stores (such as driver controlled deliveries or external locker banks).

If concrete trials or implementation could take place in Central London, the benefits could be analysed and disseminated, generating interest from others and encouraging implementation within the BID area.

The BID manager explained that the City of Westminster was very keen on the idea and had tried to persuade businesses to take deliveries out-of-hours. He indicated that some businesses said that they did this but in reality this did not happen (including take-away chains and some breweries).

In general, Paddington BID think ‘out-of-hours’ delivery and servicing activity could work in their area, as there are limited residential zones (although a significant number of hotels, potentially concerned about disturbance to guests).

4.1.2 BIDs which expressed a medium/low interest regarding 'out-of-hours' deliveries.

Camden Town Unlimited, The Holborn Partnership, Heart of London Business Alliance, Better Bankside and London Bridge confirmed that they would like to discuss this issue with their local businesses first, to find out whether they would like to get involved.

Generally those BIDs mentioned an interest in the results of the study but they did not want to get involved at this time.

4.1.2.1 *The Heart of London Business Alliance*

The Heart of London Business Alliance (the area of Leicester Square) is mainly made up of franchises, with most outlets being related to leisure and night-time entertainment-bars, theatres, cinema, restaurants, opera etc.

According to the BID Manager, there are high volumes of pedestrians in this area at/after 11pm and in the early hours of the morning and, as such, it was unclear if out-of-hours delivery would be appropriate in this area.

After midday the area becomes a pedestrian zone, so delivery activity has an added complication.

The BID was unaware of any businesses that had operated or were interested in operating out-of-hours deliveries. It was suggested, however, that most deliveries in the area did take place early in the day, at around 7am.

In short, the interest from the borough is quite poor, unless there are concrete case studies, which show the real benefits of such a scheme.

4.2 Current restrictions in Central London

4.2.1 The Central London restrictions

At present, according to stakeholder responses, three main kinds of restrictions exist in London that limit night-time or early-morning deliveries. These are explored, in turn, below.

4.2.1.1 *Restrictions implemented by local authorities*

The imposition of delivery curfews by local authorities, normally through planning conditions or environmental health restrictions, on a store-by-store basis, is the **primary issue** affecting the potential to undertake 'out-of-hours' delivery activity.

These restrictions exist primarily to safeguard local residents from excessive noise during unsociable hours.

In a study²³, the British Retail Consortium mentioned that 29% of delivery time restrictions were due to environmental health reasons, 11% were due to planning reasons and 60% due to other reasons (including outlet self-imposed opening time restrictions, etc.)

Generally retailers working in Central London distinguish two sub-sets of restrictions:

- **Voluntary** restrictions (decided at local level): this could mean a good code of practice, outlining when deliveries should not be made. It could be a voluntary operational agreement with a local Borough or resident group. Voluntary restrictions can become imposed restrictions if members of the public complain about noise disturbance.
- **Imposed restrictions**, including the Environmental Health and Planning restrictions (as well as, to some degree, the London Lorry Control Scheme). These are formally applied, legally enforced restrictions that prevent delivery and servicing activity between specified hours.

In many cases, 'out-of-hours deliveries' are not permitted due to long-established planning restrictions, despite stores not being located in a residential area. This is perceived to be the result of local authorities using standard sets of restrictions, previously recommended by central government in Planning Policy Guidance, without considering the specific relevance to individual sites.

The complex nature of London's loading/unloading restrictions compounds the effects of existing planning restrictions. On certain roads in Central London, for example, there are loading/unloading restrictions which stipulate no deliveries between 6am to 9pm, while planning restrictions for individual stores on these streets state that no deliveries are permitted before 9.30am or after 11pm etc.

Both local authorities and businesses agree that it is fundamentally easier to change environmental health restrictions than planning restrictions, due to the fact that E&H restrictions (primarily Noise Abatement Notices in the case of night-time deliveries) are applied relevant to the local context at a given time, whereas planning conditions are decided when the development of a building or site receives consent.

According to a study managed by the British Retail Consortium²⁴, over 16 companies²⁵ in the United Kingdom highlighted that approximately 20% of their total 5,125 retail outlets were affected by delivery time restrictions.

There is also an issue relating to the current multi-use of loading bays at different times of the day. In some cases, loading bays can be dedicated to loading and unloading operations during the day, becoming taxi ranks or residential parking bays at night. This creates conflict for night-time delivery staff, who in the event that a

²³ British Retail Consortium (2005), *Delivery curfews*, London.

²⁴ British Retail Consortium, *Night-time delivery survey*, July 2001.

²⁵ They operated 5,125 outlets in the UK.

loading bay has become a taxi rank or resident bay, have to park further away and, out of necessity, sometimes on prohibited areas. As a result, PCNs are issued for parking offences, rather than explicitly for night-time delivery reasons.

4.2.1.2 Restrictions implemented on Red Routes

On Red Routes²⁶ there are also restrictions relating to loading and unloading at specific times. The general rule prohibits stopping adjacent to the pavement from 7am to 7pm, Monday to Saturday. Loading bays are provided at selected locations, where loading/unloading activities can take place from 10am to 4pm with a maximum time of 20 minutes permitted for the loading/unloading operation.

Outside of these hours, loading/unloading is only allowed in accordance with local restrictions.

During consultation, some retailers mentioned that 'red route boxes'²⁷ could cause difficulties. They stated that, in principle red route boxes are a very good idea but they were not always able to use them for deliveries because cars are parked in them, taking advantage of available (if unauthorised) space along red routes. Enforcement is therefore a key issue.

4.2.1.3 Restrictions linked to the London Lorry Control Scheme

A further set of external restrictions, potentially affecting the ability to carry out 'out-of-hours' deliveries, relate to the London Lorry Control Scheme.

The LLCS maps are used by retailers and freight operators to organise deliveries in accordance with approved routes. There is, however, no direct link between the LLCS map and any locally imposed restrictions or curfews, meaning delivery staff may be unsure of the exact locations of restricted stores and the exact timings of store-specific restrictions.

This multi-layering of restrictions (LLCS on top of timed on-street loading/unloading, on top of store-specific planning conditions/Environmental Health restrictions) collectively may contribute to an unclear picture for retailers/operators as to exactly what 'out-of-hours' delivery activity can legally be undertaken.

4.2.2 Stakeholders' views on night-time delivery restrictions

- Generally, retailers would like some relaxation of the current restrictions
- Some smaller retailers do not have a problem with existing night restrictions.

²⁶ In the UK, red routes are major roads in urban areas, on which stopping (even to load or unload a vehicle) is prohibited or only allowed during very restricted periods. The intention is to enhance the flow of commuter traffic. The routes are marked with red lines along the edges of the road.

²⁷ Loading bays on the Red Routes.

Firstly, the consultation highlighted that a distinction between large, medium and small retailers needs to be made to explain why all do not share a similar point of view.

Smaller retailers usually prefer deliveries to be made during office hours when staff are already being paid to be on site.

Larger retailers, however, are eager, in principle, to consider out-hours deliveries, which allow added benefits, such as stores being re-stocked ahead of opening times. This is particularly the case for stores selling perishable goods such as supermarkets.

- Planning restrictions

Generally, large retailers know exactly which restrictions apply to their stores.

Some, for example Sainsbury's, are able to distinguish between the different kinds of imposed restrictions such as:

- Environmental Health (EH) restrictions
- Planning conditions
- Local voluntary agreements
- Highways related traffic management restrictions

According to a majority of retailers consulted, when restrictions EH imposed Noise Abatement Notices, they generally try to challenge these by trying to find a compromise with the relevant boroughs.

Retailers also confirmed that, sometimes, they receive a Noise Abatement Notice that restricts deliveries which can be in conflict with other restrictions, such as traffic management related highways restrictions. In such case, retailers have been able to successfully appeal against the Noise Abatement Notice.

Lists of stores in Central London, where EH or planning restrictions could be challenged, has been provided by some retailers within the framework of this research. A table with the list of potential stores is provided in Section 5 '*Potential areas for pilots to help increase out-of-hours deliveries*'²⁸.

- Enforcement

Results from the consultation showed that for some retailers, that their main problem related to inadequate provision of parking/loading facilities and, in practical terms, very few parking/loading bays being available when deliveries needed to be carried out.

In some cases, parking/loading restrictions were deemed too harsh for efficient delivery 'out-of-hours'. Even in the early morning, there are instances where

²⁸ Figure 5.2 'Potential retail location where an OOHD trial could take place'.

operators and retailers receive Penalty Charge Notices (PCNs) from camera evidence and from traffic enforcement staff.

One operator reported delivering to Central London, at night, three times per week to service his own stores using his own vehicles. The driver and driver's mate must unload the vehicle, lock it, leave it unattended and then carry out a 'driver controlled delivery' into the store, placing new stock in the stock-room. The driver leaves a notice in the locked cab to explain delivery activity is underway but returns each night to find a PCN affixed to the vehicle.

Although the cost of the PCN is not insignificant, this added inconvenience does not discourage the operator from continuing night-time deliveries to this location.

For some retailers this is not an issue, as they do not control their own freight transport and it is their contracted operator who has to pay the PCN²⁹ issued.

In many reported cases, freight operators incorporate the risk of receiving PCNs in their calculations when pricing for Central London delivery contracts.

- Co-operation between local authorities and businesses

Some operators and retailers reported that they have tried to co-operate with the local authority in an attempt to get loading bays painted onto the road and to remove highways restrictions.

Correspondingly, some local authorities said agreements sometimes have been made directly with local businesses. For example, a large clothes retailer on Oxford Street does not have a specific loading bay, so making deliveries was very difficult for them. It was decided that they could unload/load at certain times on Oxford Street along the pavement earlier in the day. This type of local operator/retailer specific agreement could be decided on a case-by-case basis.

As an example of this co-operation, the City of Westminster has carried out some work to look at delivery patterns in the area. Most deliveries take place between 6am and 2pm, as after that time there are restrictions in place.

However, according to the City of Westminster, there was an initiative that allowed deliveries to take place between 6:30pm and 11am the next day, provided that the delivery did not take longer than 20 minutes. The operator would not receive a PCN and so, in some ways 'out-of-hours' deliveries can be considered to already take place in that location.

Regarding the potential to increase 'out-of-hours' deliveries during the Olympic Games, the London Organising Committee of the Olympic & Paralympics Games (LOCOG)³⁰ are still developing the overall logistics strategy but are aiming to have

²⁹ In rare instances, store or office managers prefer to reimburse the PCN issued to their freight operators as they urgently need to have their goods at specified times This case has been reported by the Freight Transport Association as occurring within the City of London area.

³⁰ LOCOG is responsible for preparing and staging the 2012 Games. They were consulted via the Olympic Delivery Authority (ODA) in January 2008.

as many 'off-hours' deliveries to venues as possible. This could provide a significant opportunity to increase volumes of 'out-of-hours' deliveries, bearing in mind that the Olympic Games will also have a direct impact on the demand for delivery and servicing activity within Central London, due to increased footfall and patronage.

4.3 Current delivery/servicing activity

A key finding from the study, supported by views from retailers, freight operators and local authorities, is that out-of-hours deliveries currently do happen on a regular basis in Central London.

- General current freight delivery practice

In Central London, goods are generally delivered at a variety of times, depending on the location of the store and the current restrictions in place.

In Inner London, deliveries usually take place before 8/9am but for some stores such as those located on Oxford Street, deliveries take place at 5am. These deliveries to some premises are made early due to the fact that freight operators or retailers prefer to avoid congestion later during the day.

For some fresh food providers (particularly bakeries) it is worth noting that deliveries are made before the shops open, as the produce has to be fresh and available in the morning (the produce is baked during the night). This is the main reason why deliveries are made in the early morning.

One bakery chain mentioned that their drivers deliver to stores on a daily basis and are required to deliver goods directly into stores. They deliver using 13.5 tonne rigid vehicles, which are divided into different compartments for different produce, including chilled goods, frozen goods and ambient cages.

Retailers with own account transport operations

Own account operators servicing their own retail outlets specified that many of their stores receive deliveries every single day. Some have attempted to deliver at night in specific locations (Borough Market, Notting Hill) but their experience was that trials failed due to local resident complaints.

Generally, when operating at night, own account retailers use two man crews, with store keys to deliver directly into the retail premises. They use a two man crew to offload the vehicle, lock it up, open the store and then deliver the product inside, leaving the vehicle unattended.

Some predominantly own account retailers who deliver to their own stores at night also have other store customers (franchisees) who carry a limited number of their product lines along with other general stock.

These customers, by and large, are not willing to receive deliveries at night, as other suppliers service their stores during daytime and they expect the same from the own account retailers who deliver small consignments perhaps once per week.

The additional fact that the customer franchisee is not willing to issue own store keys to the supplier driver means that their deliveries must be carried out during the day, reducing the overall effectiveness of the own account retailer's primary night-time delivery operation.

Specific delivery hotspots

Oxford Street and Covent Garden are considered particularly difficult locations for deliveries to stores 'out of hours' but for different reasons.

Oxford Street is considered a congested road with few possibilities to deliver via the rear of the stores.

Holland Park Avenue, the main road from Shepherds Bush to Oxford Street (also a bus priority Route) was also identified as a difficult 'out of hours' delivery location. In this area, there are strict parking controls in place and limited windows for delivery. In some cases, vehicles reportedly stop on-street for between 45 minutes to 1 hour causing congestion, disruption and problems for pedestrians.

In predominantly residential areas, such as in the Royal Borough of Kensington & Chelsea, boroughs mentioned problems with light and noise intrusion, resulting from vehicles carrying out deliveries. More affluent residents, reportedly, directly call a solicitor when the problem with delivery activity becomes significant.

Some larger retailers (Marks & Spencer, Sainsbury's, Tesco, etc.) tried out-of-hours deliveries in the past, in some specific areas within Central London (including Notting Hill Gate, Borough Market) but these failed due to complaints from local residents.

Some boroughs reported conflicts between delivery staff and bus drivers, as sometimes goods vehicles are parked on bus lanes. In some cases, larger loading bays are used both by buses and delivery vehicles.

Generally, small retailers do not see the benefit of out-of-hours deliveries for their own business. In most cases they deliver to their stores using their own vehicles or they receive goods from suppliers and third party carriers during the daytime.

The main drawback for smaller businesses is the need to have staff available to receive deliveries 'out-of-hours' and the resulting implications in terms of additional cost.

Few smaller businesses consulted during the survey would agree to use lockers in which goods could be put by delivery staff during the out-of-hours periods. The main reason for this was the perceived lack of security.

4.4 Advantages of Out-of-hours deliveries & key drivers

There is a general perception, from both the public and private sector, that 'out-of-hours' deliveries are most suitable for a small number of large retailers, such as Tesco or Sainsbury's. It is important, therefore, to consider the broader potential

benefits of ‘out-of-hours’ deliveries and their relevance to a range of operators and retailers.

4.4.1 Advantages in terms of tackling congestion and its impacts

Generally, the majority of freight operators consulted during the study indicated that they prefer to make deliveries during off-peak hours. They prefer out-of-hours deliveries because of reduced traffic congestion, no need for double parking and an increase in worker productivity because of faster deliveries.

However, interestingly, most of these companies do not currently perform off-peak deliveries because they are constrained by the operating hours of their customers who do not have staff available to accept deliveries during out-of-hours periods.

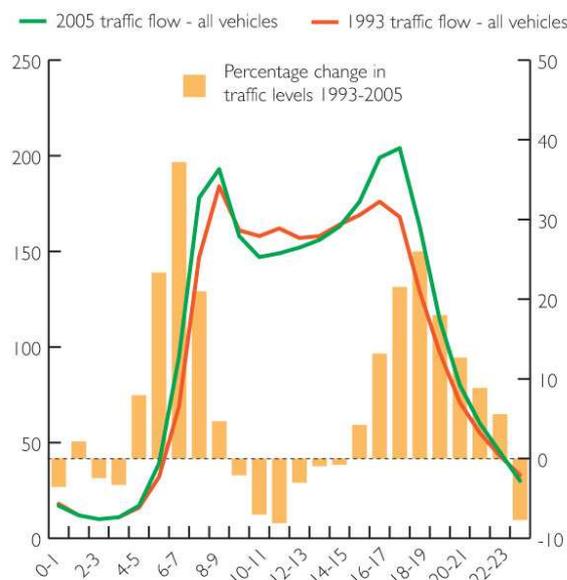
Congestion in London is perceived to be worse than elsewhere in the UK and demand for road space is high. In the view of operators and retailers, ‘out-of-hours’ deliveries can help to tackle this issue, by allowing vehicles to access their delivery point more easily and quickly, while helping to reduce overall congestion in and around stores at peak periods.

The figure below illustrates that congestion has greater peaks in the morning and at the end of the afternoon between 1993 and 2005.

This information shows that the peak hours have heightened activities and that it is becoming ever more complex for freight vehicles to circulate and then to stop along the pavement to load and unload (this is essentially the case on yellow lines, where loading and unloading activities are allowed for 20 minutes).

During this period, loading and unloading operations, although permitted, are in direct conflict with buses, cars, other road users and pedestrians.

Figure 4.3: Traffic flows in the United Kingdom



FTA, 2007

During consultation, retailers and freight operators both mentioned that an increase in out-of-hours deliveries could help them to avoid disruption to trading conditions and allow more predictable journey times.

It was clearly identified that a lack of efficiency results from loading and unloading activity during peak hours, with an increased risk to delivery staff due to the fact they have to manoeuvre more and are exposed to more traffic when delivering to Central London stores during daytime.

In the longer term, it is felt that an increase in 'out-of-hours' delivery activity could change wider 'logistics' behaviour. One retailer, for example, indicated that they had been carrying out trials on the south coast of England whereby frozen/chilled goods and ambient goods were delivered separately and at different times of the day.

Chilled and frozen goods (where the delivery vehicles are potentially noisier due to refrigeration equipment) are delivered in the evening (between 6pm-10pm) and ambient fresh goods/bread in plastic baskets are delivered using quieter vehicles in the morning, as usual (between 4am and 5am). In this way, rather than consolidating ambient fresh goods and chilled and frozen goods on the same vehicle, could still deliver fresh bread in the early morning but disturb residents less.

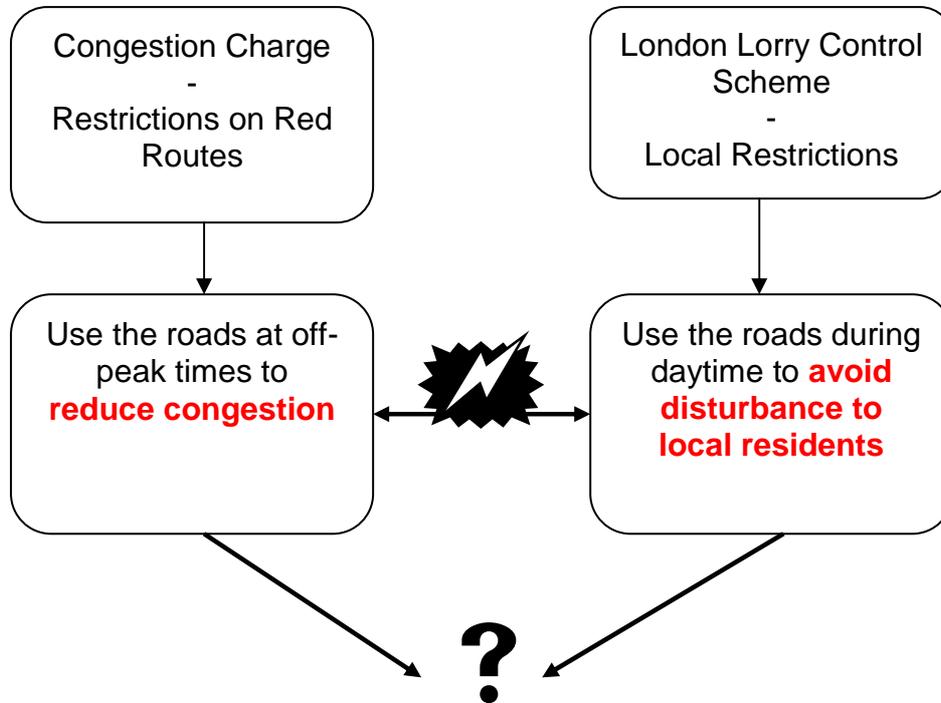
In relation to the LLCS, night-time delivery vehicles within London cannot always take the most direct route to their planned delivery point. The view from operators and retailers is that, if there is a real desire to reduce congestion during the day, then night-time goods vehicle movements should be encouraged, rather than restricted.

Out-of-hours deliveries are particularly seen as an opportunity by larger retailers and for those involved in selling perishable goods, who would like early-morning deliveries in order that they are able to fully stock their outlets ahead of opening and avoid morning peak periods for delivery and servicing activity.

Some businesses and, in fact, local authorities believe there is conflict between measures imposed by Transport for London (congestion charge, Low Emission Zone) and London Councils (LLCS) and the aspirations of local authorities in terms of sustainable transport policy. On the one hand 'out-of-hours' delivery activity seems logical in helping to achieve local Borough aspirations for sustainable transport, while on the other hand the LLCS could reroute night-time delivery vehicles on rounds that involve significantly greater fuel consumption, off-setting both the operational and environmental benefits of 'out-of-hours' delivery activity.

This conflict is never greater than when comparing the impact of the congestion charge (encouraging vehicles to avoid peak daytime periods) and red routes (permitting loading and unloading after 7pm) with the LLCS (restricting night-time movements) and individual planning and environmental health restrictions at specific locations (preventing night-time delivery and servicing activities). There is a feeling from some operators and retailers that restrictions (or financial disincentives) evident during the day are mirrored by movement or activity restrictions at night, leaving little available time for effective delivery and servicing activity, to ensure the continued prosperity of the capital.

According to representatives consulted from both the public and private sectors, there appears to be a direct conflict between TfL's approach and the aims of local authorities who want to protect their residents.



4.4.2 The meaning of 'Out-of-hours deliveries'

It is important to remember that 'out-of-hours' deliveries has different meanings, depending on the nature of each individual business.

Off-peak times to deliver to a retail store could be early morning or early evening. In the case of a restaurant or a pub, off-peak could be very early morning or during the afternoon.

The meaning of 'out-of-hours' delivery activity is also geographic. Street activities during traditional 'off-peak times', at night, are different in Kensington or in the City (essentially residential or offices) than in the West End (where the night-time economy is crucial).

As a result, it is essential to distinguish what exactly 'out-of-hours' is as regards the specific location and nature of individual stores.

4.4.3 Economic advantages

There are explicit links between the improvements of operational logistics efficiency and the economic advantages of 'out-of-hours' deliveries.

If a key part of a supply chain is better organised, such as the ‘final mile’ delivery activity into store, it allows the operator to reduce wasted time spent sitting, idling in congestion and frees up valuable assets – the vehicle and driver – for other activity.

Some freight operators, including retailers running own account operations mentioned that delivering during out-of-hours enabled them to “double shift” vehicles, essentially ‘sweating’ their vehicle assets and using them both during the day and at night for delivery and collection activity. This increases productivity and improves vehicle utilisation. Ultimately, these productivity and utilisation improvements could lead to reductions in fleet size.

‘Out-of-hours’ deliveries can also help to improve productivity and improve fuel efficiency, due to less time spent at slower speeds (if not actually) stationary with the vehicle engine idling, in peak hour traffic.

Large retailers, in particular, would significantly benefit from increased night-time deliveries, helping them to improve customer service by having goods on shelves before opening. Out-of-hours deliveries potentially allow supermarkets to have food ready on the shelves at 8am for the first customers. This means that products are where they should be, i.e. on the shelves, available to customers, with less food wastage.

It should be noted that, during consultation, some retailers could not get goods delivered to stores on Sundays because delivery curfews (planning conditions/environmental health restrictions) were set before the introduction of Sunday trading and had not been revised since.

Generally, retailers, logistics operators and local authorities felt strongly that the scheduling of both the LLCS and the various planning/environmental health curfews do not reflect the increasingly 24 hour nature of London’s economy.

According to restaurants questioned within the framework of this research, some restaurants owners (pubs serving food essentially) see a real benefit in receiving deliveries during their own ‘out-of-hours’ periods, which, in their case, means during the morning (after 9am, before 11am) when they have no clients on the premises.

However, for some pubs and restaurants, their preference would be to receive goods after their normal trading has finished for the evening. Many London restaurants are closed around 11pm/12 midnight and staff are available to receive goods at that time.

During the face-to-face interviews, restaurateurs expressed a clear view that boroughs, imposing local restrictions, had to recognise that a relationship exists between all links in the supply chain. As a result, if restaurants are willing to receive deliveries during the ‘out-of-hours’ periods, most suppliers and operators would be willing to accommodate, as they stand to gain from the increased productivity of activity during out-of-hours periods.

Some retailers also mention the importance of using ‘out-of-hours’ periods to undertake reverse logistics, including waste collection.

4.5 Key barriers to increase 'Out-of-hours deliveries'

4.5.1 'Legal' barriers

- Health and safety considerations

One of the main concerns with out-of-hours deliveries is the noise which disturbs local residents. More complaints are felt to be received by local authorities during the summer, when residents are more likely to have their windows open and hear delivery vehicles.

There was also felt to be a wider health and safety problem with some deliveries 'out of hours' in specific locations, particularly relating to potential risks to vehicles, crews and loads. Potential conflict with pedestrians late at night (many of whom may be drunk) was seen as an issue in certain locations, including Soho and the West End.

There could also be health and safety issues in terms of delivering into store, unattended or unsupervised and a minimum number of store staff might be required to be on hand. It was suggested, for example, that night-time delivery would not be advisable for a small jewellery shop or for other high value/desirable items into the city centre.

- Parking violation

According to freight operators and retailers, parking restrictions are a barrier to nighttime deliveries. It is felt that they should be relaxed, to allow better and easier access to stores. Operators often incur a PCN and frequently cannot stop near the store.

One issue mentioned by retailers was that, even where there is no local restriction to load and unload during the off-peak, the fact that they do not have on-street bays nearby to deliver to stores, leads to drivers inevitably receiving PCNs. As a result, the need for more facilities to allow easier on-street loading and unloading was highlighted as a key priority

In the opinion of operators, they do not see the purpose of imposing and enforcing restrictions at night, provided freight operators do not generate local disturbance.

Some operators recognise that parking fines are inevitable, predictable and undesirable expenditure, which can cost in the region of £15,000 to £18,000 per year for a company delivering to Central London.

4.5.2 Logistics barriers

It is inevitably difficult to change some things, which are directly linked with loading and unloading operations, even if all stakeholders recognise that solutions exist.

Noise from loading and unloading - such as from tyre scrub, brakes and transmission in low-speed manoeuvres, roller shutters, tailgates, trolleys and reversing signals, as

well as voices, music from cabs and fridge motors – can create annoyance, particularly at night, when background noise levels are lower.

Mitigation measures, to reduce operational noise, require investment and a fine balance has to be struck between the likely logistical benefits of 'increased 'out-of-hours' deliveries and the initial cost and ongoing maintenance requirements for operational changes necessary to carry out 'out-of-hours' activities.

Other costs associated with changes to existing supply chain operations can also be expensive. For example, the additional staff costs of employing drivers to work at night need to be taken into account when weighing up the overall financial calculations for the benefits of 'out-of-hours' activity.

4.5.3 'Staff' barriers

One of the main constraints to increased 'out-of-hours' delivery activity is the issue of how to receive goods at those 'out of normal trading hours' times.

To avoid the need to have to have someone on site to receive the delivery, some solutions exist like security airlocks or security boxes accessible only by the supplier and the retailer, which are at the interface between the street and the retail unit.

Driver controlled deliveries directly into store (using store keys) also remove the need for retail staff to be present.

However, many retailers may not wish to use these approaches as this could potentially increase receipt and despatch costs and raise security concerns for their premises if own staff are not present. In many cases, there is also no real incentive for retailers to receive goods 'out-of-hours', when they can merely specify their daytime delivery requirements to their suppliers and expect them to comply.

Many retailers will not permit third parties (i.e. transport operator or supplier) to access stores unsupervised by their own staff.

To make night collections and deliveries in urban areas possible for more distribution companies, negotiations between supply chain partners would be necessary.

Staff availability, costs and noise are the three key barriers, which became evident during consultation.

Some boroughs feel that out-of-hours delivery trials should be undertaken at offices where at least one member of staff is available at night.

4.5.4 Other barriers

Through consultation with hotels, the potential benefits of out-of-hours deliveries were acknowledged but concerns were expressed about noise disturbance for guests.

5 POTENTIAL AREAS FOR PILOTS TO HELP INCREASE 'OUT-OF-HOURS DELIVERIES'

Some stakeholders who were consulted (from both private and public sectors) would be eager to increase 'out-of-hours deliveries'.

Others highlighted some of the potential difficulties in increasing this activity.

A number of local authorities confirmed that, provided effective management practices and procedures were in place, they would be happy that increased 'out-of-hours' deliveries took place in their boroughs.

Other local authorities and Business Improvement Districts confirmed that they were not now ready to host pilots at this stage, preferring first to observe the results of this research and any subsequent trials.

Islington FQP mentioned that 'out-of-hours' deliveries were not an issue that Islington had ever worked on before but that it was something that they would support, in principle.

The concept had been discussed at some Freight Quality Partnership meetings and they had thought that it might be appropriate in some areas in Islington, including:

- The Angel area, which is considered the town centre. This is a lively area, that virtually operates 24 hours-a-day (hence delivery noise here would not be a significant issue as it is already quite lively in the evening),
- Farringdon area, with restaurants and bars. There are offices that are open during the day but it is not primarily a residential area
- Nag's head area of town centre as it is not particularly a residential area.

Islington FQP also indicated that they had not done any research themselves into which businesses would be interested in operating 'out-of-hours' deliveries but they have good relationships with businesses in the Angel area and could explore the issue in more detail, if necessary.

In addition, Islington mentioned that TESCO on Essex Rd would potentially be interested, as they had mentioned that they were unhappy with their current delivery system. It could be likely that other businesses would also want to be involved.

In **Borough Market**, they already operate some 'out-of-hours' deliveries for wholesalers.

Deliveries are carried out between 10pm and 1am every day, except from Saturday-Sunday. The wholesale market is much reduced in size these days, so it means that there are only about 10-15 lorries coming in each evening, with approximately 30% of these vehicles being large articulated vehicles and the remainder being smaller, around 12-15tonnes vehicles.

Apparently there are no particular problems carrying out deliveries at these times.

There have, on occasions, been complaints from local residents about noise but the area is not particularly residential in nature and people living in the area accept the existence of the market and its operations.

As a result, it is a real possibility that out-of-hours deliveries could be increased in this area. It would be especially interesting if retailers who started trials in the past could become engaged in renewed dialogue with the local authority.

Borough Market managers think that the central location of the market could be one of the many factors that has contributed to its decline over recent years. The central location has effectively made it harder for deliveries to be made and also harder for customers to access the site (congestion charge etc.).

As a comparison, the bigger markets such as New Spitalfields are on the outskirts of London, near motorway connections, so access is much easier; making the offer potentially more attractive to users.

Borough Market traders receive deliveries at various times of the day and some do open early in the morning. In Borough Market, there are no current plans to extend 'out-of-hours' deliveries, although the Borough Market manager does see the benefit of concept.

Sainsbury's sent a list of stores where 'out-of-hours' could happen to the project team. They have confirmed their willingness to participate in a pilot in Central London.

According to **Camden Council**, Covent Garden is a place with residents, lots of restaurants and a very busy night-time economy, due to the high number of people present on the streets.

Camden Council suggested that this area is representative of the variety of problems we are likely to meet in Central London and therefore suggested that trials in Covent Garden could be especially relevant.

Generally, in order to allow for the increase of out-of-hours deliveries, without generating more disturbance for residents, **some boroughs** proposed that the FORS (Freight Operation Recognition Scheme) scheme is linked in with 'out-of-hours' deliveries and incentives such as 'out-of-hours' deliveries could be offered to some organisations achieving the higher Silver and Gold standards.

Figure 5.1: Potential Retail Locations where an OOHD trial could take place

Store	Location	Delivery note	Store note
Sainsbury's Supermarket	Liverpool Road (Borough of Islington)		
Waitrose Supermarket (Nags Head Shopping Centre)	Holloway Road (Borough of Islington)		

Morrison's Supermarket (Nags Head Shopping Centre)	Holloway Road (Borough of Islington)		
Sainsbury's Upper Street	317-318 Upper Street (Borough of Islington)		
Sainsbury's Euston Tower	Unites 3&4 Euston Tower (Borough of Camden)	No delivery between Midday and 5pm	
Sainsbury's Paddington Station	116-126 Borough High Street (Borough of Southwark)	Station restrictions	Store does not have staff to unload backdoor until 11pm
Sainsbury's Westbourne Grove	88-94 Westbourne Grove (Royal Borough of Kensington & Chelsea)	Traffic restrictions – double Yellow lines	Traffic restriction: can only accept deliveries between 9pm and 6am
Sainsbury's Mid City Place	Unit 2, Mid City Place (Borough of Camden)	Management agreement and traffic issues	

Data from Sainsbury's and Islington Council, 2008

5 CONCLUSIONS AND RECOMMENDATIONS

The two-month consultation phase of the study provided a good opportunity for public and private stakeholders to express their views regarding an increase of 'out-of-hours' delivery activity in Central London.

One of the key findings is that 'out-of-hours' deliveries have different meanings, which depend on the nature of the businesses. Off-peak times to deliver to a retail store can be either early morning or later in the day, outside normal trading hours. In the case of a restaurant or pub, this 'out-of-peak time may be mid-afternoon.

The meaning of 'out-of-hours' deliveries is also partly dependent on geography. On-street activities during 'off-peak times', at night, are different in Kensington or the City of London (essentially residential or offices) than they are in the West End, where the night-time economy is more vibrant.

As a result, it is essential to distinguish effectively between the needs and expectations in terms of 'out-of-hours' deliveries of individual sectors and types of premises.

Generally public and private stakeholders interviewed within the framework of this research have shown that they considered 'out-of-hours' deliveries as an interesting concept which could work effectively in Central London, provided the quality of life of local residents is not disturbed by activities.

As a result, technical solutions have to be found to reduce noise due to loading and unloading operations (through the use of equipment like quiet roll cages, vehicle 'whisper' kits, etc.) as well as through education of delivery staff.

If noise is managed, it is apparent that a number of local authorities and businesses would welcome 24 hour delivery and servicing activities in Central London.

When looking at the detail, segmentations of goods and the nature of suitable businesses have to be analysed. Consultation clearly highlighted that:

- Retailers who also have control of the transport of their own goods are generally interested in an increase of the out-of-hours deliveries
- Retailers who are not in charge of the transport of their own goods are less interested due to security conditions (they generally do not want to pay their own staff to be on site to receive goods 'out-of-hours' and are reluctant to allow other staff (from delivery companies) to have easy, unsupervised access to their stores).
- Retailers are diverse in their requirements for deliveries. For example large retailers can often deal with night-time deliveries and may indeed prefer them. Most small or medium retailers want deliveries to occur during office hours, when staff are on site and already being paid. Early morning deliveries are necessary for perishable goods and less important for non-perishable goods.
- Local authorities are potentially co-operative, provided no additional noise is generated.

- If Business Improvement Districts could be a good area to start a trial the fact still remains they quite often do not consider 'urban freight' as a part of their competences. However some of them could be happy to participate to a trial if their members have expressed an interest and if the results from this consultation showed an relative interest from businesses for an increase 'out-of-hours'.

▪

Following consultation, it is possible to distinguish different levels of participation by stakeholders:

- The Boroughs of Islington, Camden and the City of Westminster would agree to be hosts for subsequent trials
- Sainsbury's would agree to be a participating operator/retailer for selected stores
- Many businesses and other local authorities are interested in being involved in a trial and/or interested in the results of other trials
- Some freight operators already operate out-of-hours to maximum capacity and do not see the benefits of being involved in subsequent trials

Recommendations

- There is a need to review Environmental Health restrictions relating to Noise Abatement Notices at commercial premises within Central London. Before updating restrictions it is extremely important to understand the current (i.e. modern day) logistics patterns of operators and balance these with the requirements of local residents and the needs of other public space users during the 'out-of-hours' time. The way forward would include encouraging and supporting businesses to review their times of delivery.
- There is a need to carry out a macro-study covering, in detail, individual boroughs, to explore in some detail what currently happens regarding local loading and unloading operations. This research should also provide additional information on the organisation of supply chains to understand why loading and unloading activities currently take place at specific times and in particular locations. This macro-study would help to fill in the existing 'knowledge gap' within Boroughs, relating to the issue of local urban freight activities.
- There is a potential need to integrate noise within the Low Emission Zone criteria. Even if it would be potentially difficult to enforce, the fact still remains that such a decision would give a more coherent message in terms of the relations between policies to tackle congestion centrally (TfL) and policies which avoid resident noise disturbance (Boroughs).
- Freight operators wishing to benefit from 'out-of-hours' delivery concessions should equip their vehicles with noise abatement technology and delivery staff should be trained appropriately.

- A series of 'out-of-hours' delivery trials, drawing on the locations specified in Table 5.1, would be beneficial to promote the concept and principles of out-of-hours deliveries in Central London
- A variety of pilots, covering different locations (predominantly residential, predominantly commercial and others) should be reported using a series of case studies, brought together in an 'out-of-hours' case study compendium document, providing real-life best practice examples of measures which actually worked at a range of locations.
- An OOHD trial could be linked to a consolidation centre trial to help optimise the environmental performance of the last mile delivery. Issues relating to the inherent complexities of multi-user site operations could be investigated in such a trial.

Ten Point Road Map for Operators/Retailers for 'Out-of-hours deliveries' Success

1. Read the toolkit developed by the Freight Transport Association, '*Delivering the goods: a toolkit for improving night-time deliveries*' and use it as an operational guideline.
2. Assess and understand current restrictions, distinguishing between planning and environmental health restrictions, in order to choose appropriate locations. Ideally select a variety of sites, with diverse needs, to help develop a 'portfolio' of pilot studies, to help better understand which measures worked at which locations.
3. Liaise with your local authority from the very start of the project, in order to explain your intentions to them and to ensure they are aware of the need for partnership working.
4. Similarly, liaise with your suppliers and/or your freight operators (if applicable) and other local businesses in order to explain your plans and to form appropriate partnerships.
5. In parallel with the two previous liaison steps, consider contacting the Noise Abatement Society (www.noiseabatementociety.com), which can potentially provide support your project and offer advice to limit/reduce the noise generated by loading and unloading operations.
6. Consider adopting the principles of the '*Silent Approach*', developed by the Noise Abatement Society, which focuses on collaboration between the public and the private sector stakeholders involved in such a project. This approach focuses on providing residents an opportunity to express their complaints if they exist or develop.
7. Monitor existing operational performance (fuel consumption, vehicle utilisation, driver and vehicle productivity and other operational Key Performance Indicators (KPIs), etc.) before the trial, to assess prior levels of operational efficiency.

8. Set an appropriate time limit for the trial, bearing in mind that the risk of receiving complaints from residents is higher during the spring/summer period (due to the fact that they often let their windows opened during the out-of-hours times). If possible, try to cover different operational trends (including trading peaks and troughs) within the same trial period, to help assess likely times of potential conflict.

9. Ensure adequate liaison takes place between the key partners (retailers, operators, suppliers, local authorities, potentially also residents) throughout the trial period.

10. Measure, on an ongoing basis (both during and for a period after the pilot), the benefits and difficulties of the trial (fuel consumption, delivery staff degree of satisfaction, estimation of the time/operating costs saved per day, as well as the volume and detail of local resident complaints). Use these KPIs to develop a 'business case' to determine the benefits, or otherwise, of pursuing an increase in 'out-of-hours' deliveries at each specific location.

(Optional). - Communicate and disseminate the results of the trial, as appropriate.

(Optional) - Freight operators and retailers should develop Corporate Community Plans, highlighting local corporate responsibilities and activities for engagement and interaction with the local community.

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- NICHES project (2006), *Inner-city night delivery: innovative approaches in city logistics*, European Commission.

APPENDIX

1. LIST OF THE STAKEHOLDERS CONTACTED

Companies	Position	Interviews
British Retail Consortium	Property policy executive	face-to-face
Unichem	Service Delivery manager	phone
Clean Linen Service	Transport Manager	phone
E-stop	Logistics Director	phone
Freight Transport Association	Regional Policy Manager	phone and face-to-face
Holland & Barrett	Transport Manager	phone
CSB Logistics		phone
DHL Exel	BAA subcontractor	phone
Alliance Boots	Public Policy Manager	face-to-face
Greggs Bakery	Responsible for deliveries - South-East England	phone
London Forum of Amenity and Civic Societies	Chair of Planning and Transport	phone
Noise Abatement Society	Director	phone
Sainsbury's	Environment Manager for Supply chain	phone and face-to-face
Superdrug and Savers	Transport Manager	phone
Thorntons plc	Transport & Warehousing Manager	phone
Wincanton Logistics	Depot Manager	phone
John Lewis	Deputy Head of Transport	phone
IGD	Strategy Director & Food Chain Centre Director	phone
Allied Bakeries	Logistics Manager	phone and face-to-face
Borough Market	Market Manager	phone
The Fentiman Arm (pub)	Waiter	face-to-face
Hotel 87	Waiter	Face-to-face
Public sector	Position	Interviews
French Embassy in the UK - Economic Dept	Economic Attaché	phone and face-to-face
City of London Corporation	Senior Policy Manager	face-to-face
City of London Corporation	Traffic Manager	face-to-face
Islington Freight Quality Partnership	Senior Transport planner	phone
London Borough of Camden	Principal Transport Planner	face-to-face
London Borough of Camden	Street Policy Manager	face-to-face
University of Westminster	Professor	face-to-face
London 2012	Statutory & Public Consultation Manager	phone
City of Westminster	Transport Policy officer	phone
London Development Agency	Head of Programme Management	phone

RB Kensington & Chelsea	Transport planner	phone
London Councils	Principal Transport Policy Officer	phone and face-to-face
London Borough of Southwark	Senior Transport Planner	Email
Business Improvement District	Position	Interviews
Angel BID	BID Director	phone
Better Bankside	Business Liaison Manager	phone
Camden Town Unlimited	Operation Manager	phone
Heart of London Business Alliance	Business Coordinator	phone
London Bridge	Business Liaison Manager	phone
New West End Company	Strategic Advisor	phone
		phone
Paddington BID	BID Manager	face-to-face
The Holborn Partnership	BID programmes Manager	phone
	Office Coordinator	phone
Waterloo Quarter Business Alliance	Director of operations	face-to-face

2. The London Lorry Control Scheme

London Lorry Control Scheme

Vehicles over 18 tonnes

If the vehicle is over 18 tonnes maximum permissible weight (MPW), the London Lorry Control Scheme requires the driver to obtain a permit before driving at night or weekends on many roads in London. The scheme operates Monday to Friday from 21:00 to 07:00, and from 13:00 on Saturday to 07:00 on Monday.

Vehicles below 18 tonnes

If the vehicle weighs less than 18 tonnes MPW, the driver does not need a permit to drive or make deliveries in London.

The London Lorry Control Scheme aims to improve the environment for Londoners by restricting the journeys and routes that goods vehicles over 18 tonnes MPW can make at night and during weekends.

3. Discussion Guide used for the consultation

Central London Freight Quality Partnership
‘Out-of-hours’ deliveries
Internal Project Team Discussion guide for
Businesses / Commercial activities

‘Out-of-hours’ deliveries can be considered to be those made not only during periods of night-time restrictions, but also during other available non-restricted delivery windows, outside of normal opening hours.

✓ Where is the business located?

Name	Company	Position

- Name of respondent? Position?
- Are decisions relating to the delivery of goods, and to stock-holding strategy, in relation to the business location, the responsibility of anyone else in the company? [for e.g.: a logistics director, a regional retail manager etc.; to whom does the respondent report on such matters?] Or is another company in charge of the transport of the goods? And who is the contact? (Own account? / Hire & Reward?)

- Name of company? Nature of business / Brief description of goods received?
- Is the business part of a larger precinct or shopping centre, or does it receive goods independently? Are there any other constraints on the extent to which the respondent / the company can make decisions in relation to logistics strategy and practice?
 [Prompt for any information on load factors of vehicles actually delivering to the site.]

What is the business Postcode / BID?

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- Location of unit [Obtain post code, if possible]?
- From where do incoming goods originate? [A single location (might be a regional consolidation location), or many origins?] Which inbound routes are mainly used? [Prompt for which main arterial roads are used.]

Are your store(s) located in a residential area?		
	Yes	<input type="checkbox"/>
	No	<input type="checkbox"/>
Please provide details above		

- Is the area where you are based more a commercial area / residential area / offices / a mix?

Is there a courtyard in your store where loading/unloading could be operated? Or are there rear access facilities?		
	Yes	<input type="checkbox"/>
Please provide details above		

	No	<input type="checkbox"/>	
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▪ This question aims to know if they can receive goods without disturbing other road users.

✓ Current deliveries servicing within the area

What time do you receive goods and how many times a day?			
	Morning	<input type="checkbox"/>	
	During the day	<input type="checkbox"/>	
	Evening	<input type="checkbox"/> →	
Please provide details here			
How regularly do you receive deliveries? Please provide details below			

- Frequency of deliveries: How key is current delivery frequency to your business
- Time window issues: In what time windows are goods currently received? [Are goods received 24 hours a day, 7 days a week? What are the local restrictions on delivery times?]
- To what extent is the timing of current deliveries crucial, and in what way?
- The potential for added-value advantages of receiving goods out-of-hours: How much space is currently taken up at your location with stock/reception of goods? [It would be useful to have an estimate of the percentage of available space that is taken up with stock.]. This question aims to know if they could receive goods when no employee is working.

From which location(s) are your goods / supplies delivered from?	

▪ How much staff resource is taken up with activities related to the control of the loading/unloading operations? [Again, an estimate of percentage?]

Do you receive goods / supplies:			
	independently	<input type="checkbox"/>	
	part of a larger precinct/shopping centre	<input type="checkbox"/>	
	Other	<input type="checkbox"/> →	
Please provide details above			
What is the nature of the goods you regularly receive?			
	Fresh goods	<input type="checkbox"/>	Please provide details above

	Frozen goods	<input type="checkbox"/>	
	Quick-perishable goods (vegetables, bread...)	<input type="checkbox"/>	
	Stationery	<input type="checkbox"/>	
	Brewery	<input type="checkbox"/>	
	Clothes	<input type="checkbox"/>	
	Chemist/pharmacy	<input type="checkbox"/>	
	Other	<input type="checkbox"/>	

- *Nature of goods: Are there any specific handling or docking requirements for deliveries, due to the nature of the goods, or the vehicles in which they are delivered? Are there any specific storage requirements for the goods?*
- *Are there any particular security requirements for the goods whilst they are in transit, or being stored, as a result of their nature or value?*
- *Are there restrictions as to the extent to which goods can be mixed in a consignment with other goods, either due to the nature of the goods, or the way in which they are packaged and/or transported?*

	What type of vehicles are your goods delivered in? (i.e. size of vehicle?, are they temperature controlled ?, are they specialised in any other way ?).

- *Type of vehicles used: Size(s) of vehicle, rigid / artic. Are vehicles required to be specialised in any way? [e.g. refrigerated / chilled / special compartments / special racking systems etc.]*

	In what type of units are your goods delivered? And in how many units normally? How many times a week do you receive these?		
	Roll cages	<input type="checkbox"/>	
	Pallets	<input type="checkbox"/>	
	Hanging racks	<input type="checkbox"/>	
	Other	<input type="checkbox"/>	

Please provide details above

	Is reverse logistics (i.e. waste disposal/recycling) incorporated into your delivery systems? And why?	
	Yes	<input type="checkbox"/>
	No	<input type="checkbox"/>

Please provide details above

- Reverse logistics considerations: To what extent is reverse logistics involved in your operation / your responsibility? [This might include returns, the return of pallets and packaging, the removal of waste, the recycling of waste etc.]
- What resources (i.e. time, space, staff) are expended on this activity on the retail premises? To what extent might 'out-of-hours deliveries' assist in improving the efficiency / reducing the cost of such activities? Are there any reasons why it would not be desirable to involve 'out-of-hours deliveries' in such activities?

✓ Current restrictions

What are the current restrictions (including planning or environmental health timed restrictions) to deliver to your store?	

- Do they have time restrictions to deliver? Is their store located on a Red Route? Yellow line? Are they authorized to receive goods at night (or 'out-of-hours')? Have they ever negotiated the local rules? Does their freight operator (or drivers from their company) have problems with the London Lorry Ban to access to the store? Etc.

✓ Business requirements in terms of 'Out-of-hours' deliveries

✓ What do the company think about increasing 'out-of-hours deliveries and could their views be influenced?

Do you have problems with delivery and servicing activity during <u>the day</u> ?		
	Yes	<input type="checkbox"/>
	No	<input type="checkbox"/>
Please provide details above		
Do you have problems with delivery and servicing activity during <u>the night</u> ?		
	Yes	<input type="checkbox"/>
	No	<input type="checkbox"/>
Please provide details above		

- Try to identify the problems, classify them and try to understand the reasons why they exist. If the interviewee says there is no problem, ask why he delivers at night (or not). If he delivers at night, try to know if he negotiated an arrangement with the local authorities etc. or if there is no restriction. In that case, prompt him to find out where in Central London his company encounters problems delivering at night and why.

Would you be interested in receiving goods <u>earlier</u> in the day? And why?		
	Yes	<input type="checkbox"/>
	No	<input type="checkbox"/>

Would you be interested in receiving goods <u>later</u> in the day? And why?		
	Yes	<input type="checkbox"/>

	No	<input type="checkbox"/>	
If 'Yes', why do 'out-of-hours' deliveries do not currently take place (key barriers)?			

- If "Yes", could you please indicate what periods of the day would be the most beneficial for you? And have you ever tried to ask to your freight operator to deliver to your stores out of the authorised hours? Could you benefit from having earlier/later deliveries? And why?
- If "Yes" at the 1st question: Prompt about the residential areas, if employees could receive goods 'out-of-hours', would they be ready to give keys of the store to delivery staff? Are they interested in receiving goods in lockers? What would be the impact of having 'out-of-hours' deliveries? The idea is to clearly define any existing restrictions and any other local issues that may be linked, as well as the extent of operational change required by retailers, operators and local authorities.

Do you think that delivery time restrictions or lorry bans should be changed?			
	Yes	<input type="checkbox"/>	Please provide details above
	No	<input type="checkbox"/>	
Do you have any specific requirements for any of your deliveries e.g. refrigeration, extra security which mean you currently avoid receiving goods 'Out-of-hours'?			
And what would be the key drivers to make the OOHD possible?			
	Yes	<input type="checkbox"/>	Please provide details above
	No	<input type="checkbox"/>	

- Do you have any policy or preference for the way in which goods are delivered, stored and moved? [e.g. roll cages .v. pallets, pallets of given size etc.]. What could influence, or not, the OOHD being put in place?

Is your company in a sustainable development process (including new processes about the loading and unloading activities)? Would you be interested by 'Out-of-hours' deliveries?			
	Yes	<input type="checkbox"/>	Please provide details above
	No	<input type="checkbox"/>	

- The profile of the sustainability agenda: [Find out, beforehand, what the company's policy is towards carbon emissions and sustainability, and the level of importance that such issues have.]
- To what extent is the reduction of emissions, and the wider issue of pollution, part of the remit for your job? [If the response is largely negative, prompt for information on who is instead responsible, in the company, for such issues.]
- To what extent is there pressure from (directors and management) higher up the company for you to reduce emissions? Generally speaking, in what order of priority would you place "Cost", "Service", "Emissions"?
- To what extent is there such pressure from other partners in the supply chain, from competitors, from customers etc? Is there any sign, either from within the company, or from outside, that this might change in the future? [Adopt the same line of enquiry in relation to visual intrusion, noise and congestion.]

Would you like that other businesses in your area are encouraged to receive goods during 'out-of-hours' periods? And please explain your views...		
	Yes	<input type="checkbox"/>
	No	<input type="checkbox"/>
Please provide details above		

Finally, could you please nominate someone in your company who might be able to provide us with more detailed information on the routing and scheduling of your deliveries? *(if necessary)*

Name:

Tel.:

Email:

Remember to say - Many thanks for your help
 Don't forget to give your contact details and links about the
 Central London FQP (www.centrallondonfqp.com)