



# Draft Freight and Servicing Action Plan

## Appendix A

# The Freight and Servicing Context of Camden

February 2024



# Table of Contents

<b>1. Introduction</b>	<b>3</b>
<b>2. Context</b>	<b>3</b>
<b>3. Policy Context</b>	<b>6</b>
<b>4. Analysis of Freight In Camden</b>	<b>10</b>
<b>5. Challenges</b>	<b>19</b>

DRAFT



## 1. INTRODUCTION

- 1.1. This appendix complements Camden’s Freight and Servicing Action Plan. It provides a clear and in-depth discussion on the borough’s transport context: general background, policies, evidence, and challenges.

## 2. CONTEXT

- 2.1. There is significant demand for freight and servicing in Camden. The borough has a resident population of [216,900](#). Camden’s importance as a centre for employment, leisure, tourism, education, and healthcare means that significant numbers of people visit the borough every day, causing the daytime population to almost double to nearly half a million people – the second highest in London after Westminster.
- 2.2. Camden has several key entertainment destinations, including Theatreland, museums, as well as the attractions of Covent Garden, Camden Town, and the West End. Three major hospitals are located in Camden: University College London Hospital (UCLH), the Royal Free in Hampstead, and Great Ormond Street Hospital. There are also two universities: the London University and University College London.
- 2.3. Camden is also home to the [second highest](#) number of businesses in London (after Westminster), and the third highest in the UK. The majority (nearly 86%) of Camden’s businesses are small and independent, employing fewer than 10 employees and with many categorised as ‘sole traders.’ These generate a high number of smaller deliveries, adding to overall pressure on roads across the borough.
- 2.4. It is anticipated that demand for freight and servicing will continue to [increase](#) across London and in Camden, partly driven by population and job growth. The Borough’s population is predicted to grow by [4.4%](#) between 2023 and 2033 accompanied by an increase in employment. It is projected that Camden will add 60,000 jobs, an [increase by 15%](#), between 2021 and 2041. This suggests more deliveries, freight, and servicing, and increased pressure on the road network.
- 2.5. However, the demand for freight and servicing varies across the borough both by type and intensity and is influenced by a complex multi-modal transport network. While the north of the borough is mainly residential with large areas of green space, such as Hampstead Heath, Regent’s Park and Primrose Hill, there are also town centres and other key destinations. Local high streets at Camden Town, Kentish Town, Finchley Road, Hampstead, and Kilburn High Road require high levels of freight and servicing provision. The Royal Free Hospital, just south of Hampstead Heath, is another high-demand node for a range of goods and services, including medical supplies, most of which is likely to be time-critical.
- 2.6. The southern part of the borough sits in the economic heart of central London and is a key part of the Central Activities Zone (CAZ). This includes significant employment, commercial, and leisure complexes, such as those at King’s Cross,



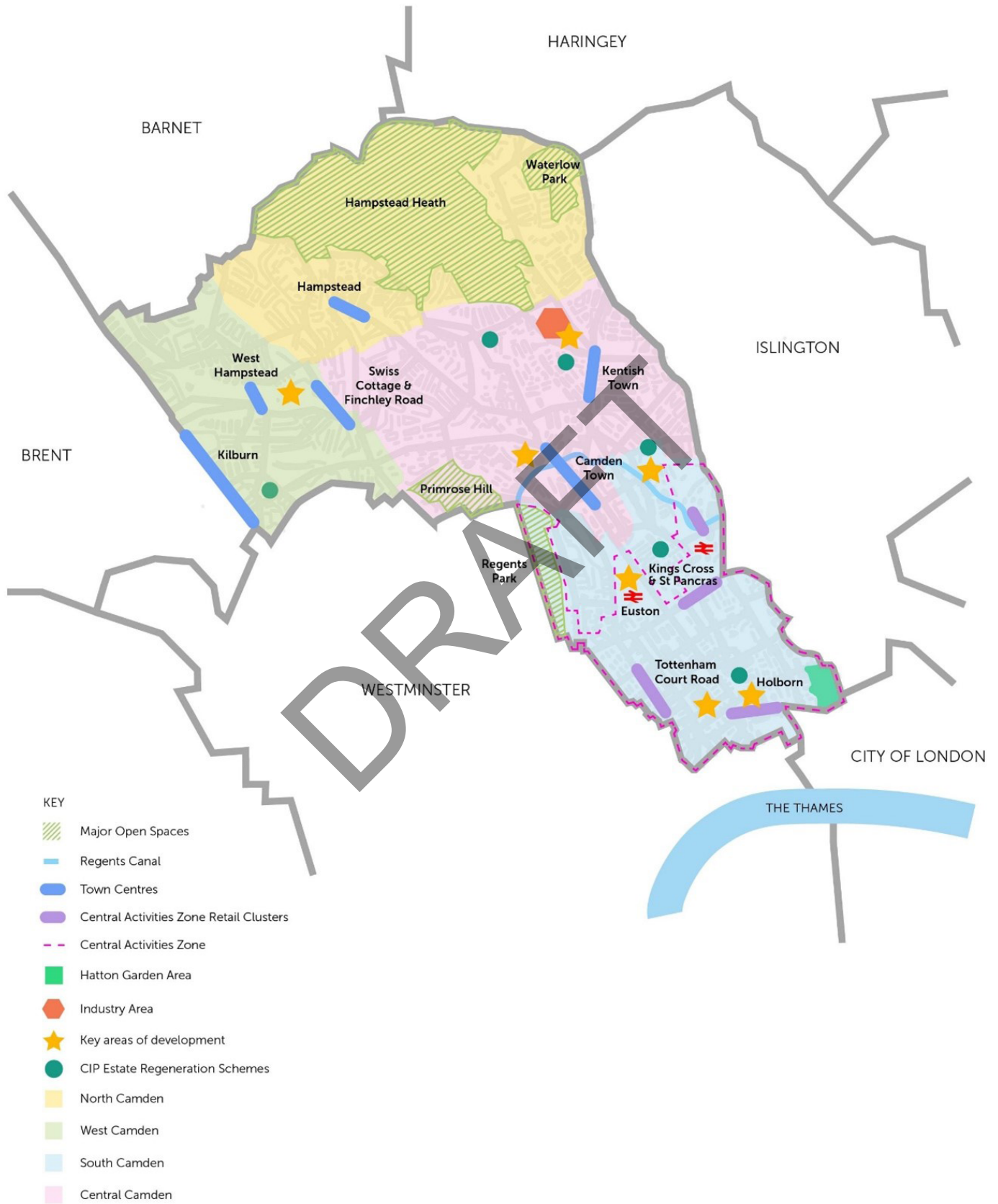
Holborn and Tottenham Court Road and West End.

- 2.7. Although demand for resident parking is lower in the south of the borough compared to the north due to lower car ownership, demand on kerb space is far more intensive and varied. Motorcycle bays, electric vehicle charging bays, dockless bike and e-scooter hire bays, car club bays, bus stops and stands, coach parking, paid for and disabled blue and green badge parking, on-carriageway cycle parking, and taxi ranks, to name a few, all compete for limited kerb space with loading and deliveries for the numerous shops and attractions along often narrow streets.
- 2.8. The 'knowledge quarter' is in the southern part of the borough too and encompasses University College London (UCL), the British Library, and the British Museum. University College Hospital and St. Pancras Hospital constitute additional key hubs for delivery and servicing activities in this area. There are other commercial hubs such as Farringdon and Hatton Garden.
- 2.9. The draft new Local Plan seeks to direct development to the growth areas around King's Cross, Euston, Tottenham Court Road, Holborn, West Hampstead, and Kentish Town and to the town centres of Camden Town, Finchley Rd/ Swiss Cottage, Kentish Town, Kilburn High Road, and West Hampstead. It also supports estate renewal schemes delivered through the Council's Community Investment Programme. The Plan allocates sites where development is expected to come forward to deliver new homes, jobs, open space, health and community facilities, leisure, retail and recreation opportunities, together with necessary infrastructure.

DRAFT



Figure 1: Land use and growth areas in Camden





- 2.10. There are many areas in the borough that have a thriving night-time economy, especially the West End and Camden Town, without defined 'off-peak period', when streets could be less busy.
- 2.11. Freight movements are also influenced by Camden's Road network: Camden's road hierarchy designates routes in the borough according to their strategic importance and traffic levels. Some of the most strategically important routes are managed directly by Transport for London (TfL) as 'red routes' (Transport for London Road Network – TLRN). Borough roads which carry high volumes of motor traffic are designated as being part of the Strategic Road Network (SRN). Freight traffic relies on such arterial routes to deliver to high streets which are themselves very busy with competing demands on the street.
- 2.12. Camden hosts one of London's key rail freight arteries; the North London line provides a route from east coast ports like London Gateway and Felixstowe and through London to the Midlands and the Southwest. However, there are no rail freight terminals within the borough. Rail freight has to be offloaded elsewhere and brought to the area by road. Existing rail freight facilities are located just beyond the boundaries of Camden, such as the Ferme Park yard in Hornsey or the Royal Mail's Princess Royal distribution centre at Stonebridge Park.
- 2.13. The recently completed Elizabeth Line is bringing thousands more people within reach of Central London and job and leisure opportunities on the alignment, particularly at Tottenham Court Road. And Euston is currently seeing the development of a new High Speed terminal station which is set to become an area of significant growth as the remodelled station will offer a new and wider range of housing and commercial/retail development.
- 2.14. The Regent's Canal passes through the middle of Camden and has access points to the river Thames at Limehouse in the east and Brentford in the west. However, the width of the canal and dimensions of locks restrict larger vessels from being used here, and at present only supports smaller deliveries.
- 2.15. Areas south of Euston Road fall into the Congestion Charge Zone (CCZ), while the entire Borough within the Ultra-Low Emission Zone (ULEZ) and Low Emission Zone (LEZ); both bring environmental benefits to the borough.

### 3. POLICY CONTEXT

#### National policies

- 3.1. The Department for Transport released the [Future of Freight: a long-term plan](#) in 2022 to identify a strategic direction and key priorities in the freight and logistics sector in collaboration with the industry. The plan aims to make the sector more efficient, reliable, resilient, environmentally sustainable, and valued by society. To that end, it highlights challenges and actions in five priority areas: national freight network, transition to net zero, planning, people & skills, and data & technology.



- 3.2. The Department for Transport released **Decarbonising Transport: Setting the Challenge** in 2020, followed by **Decarbonising Transport: A Better, Greener Britain** in 2021, to set out the scale of emission reductions needed to achieve the legally binding national carbon budgets. The most recent plan released in 2021 highlights commitments, actions, and timings for achieving multimodal decarbonisation in the transport sector, including delivering a zero-emission freight and logistics sector.
- 3.3. In 2020, the UK Government set out its **Gear Change strategy**, a national vision for walking and cycling. One of the key themes is 'better streets for cycling and people' to be achieved through reallocation of street space and rolling out 'Low Traffic Neighbourhood (LTN) and 'Mini-Holland' style schemes. This approach signals further pressure on freight vehicles as competition for limited carriageway and kerb space continues to rise while opportunities for access declines.

### Regional policies

- 3.4. **The 2021 London Plan** is a spatial development strategy which sets out long-term development plans for promoting economic and social development. This includes the development of thousands of new homes which will generate significant freight and servicing traffic both during construction and after to meet the increased demand for goods and services from the growing residential population.
- 3.5. **The Mayor's Transport Strategy (MTS) 2018** sets out an overarching aim to create Healthy Streets – streets where more people walk and cycle and use public transport. The aim is that 80% of all journeys in London will be made on foot, by bike, or public transport by 2041 along with a corresponding decrease in motor vehicle use to address pollution, carbon emissions, road danger, congestion and delays, inactivity and noise. This includes a strategic target to reduce the number of vehicle kilometres driven on London's roads and to reduce the number of freight vehicles entering the congestion charge zone in the morning peak.
- 3.6. The **Mayor's Healthy Streets approach 2017** sets out the following freight-related aims:
- To encourage a shift away from road vehicles and towards more 'space efficient' modes to tackle road congestion and guarantee reliable deliveries and servicing.
  - To minimise freight trips on the road network including through consolidation measures.
  - To develop new creative solutions for managing freight including more flexible use of London's streets.
- 3.7. **The Mayor's Freight and Servicing Action Plan 2019** sets targets for improving safety, cleanliness, and efficiency of servicing and freight across London. Across the city, it aims to reduce the number of lorries and vans entering central London in the morning peak by 10% by 2026, compared to 2016-17 levels. This



means 3,000 fewer servicing and freight vehicles entering the entire Congestion Charge Zone each morning peak. The Mayor's FSAP sets out a range of measures to encourage more sustainable and efficient freight including:

- A focus on raising awareness and knowledge sharing around the impact of deliveries to encourage consumer behaviour change.
- Provision of Efficient Delivery toolkits to help businesses, operators and other organisations implement best practice methods such as retiming deliveries and waste consolidation.
- Promotion of freight consolidation to support safe, clean, and efficient freight by funding demonstrator projects and upscaling instances of successful implementation.
- Working with boroughs to update access/loading regulations and finding ways to increase efficiency at the kerb side.
- Providing clear information and guidance on restriction and regulations for drivers and operators

## Local policies

**3.8. [The Camden Transport Strategy \(CTS\) 2019](#)** aims to deliver MTS objectives and targets. It similarly prioritises sustainable, healthy, active travel and a shift away from inessential motor vehicle driven trips in order to address the multiple transport challenges of pollution, carbon emissions, road danger, congestion and delays, and inactivity which, if left unchecked, will be exacerbated by growth. These aims are presented through seven key objectives:

- **Objective 1:** To transform our streets and places to enable an increase in walking and cycling.
- **Objective 2:** To reduce car ownership and use, and motor traffic levels in Camden.
- **Objective 3:** To deliver a sustainable transport system and streets that are accessible and inclusive for all.
- **Objective 4:** To substantially reduce all road casualties in Camden and progress towards zero killed and seriously injured (KSI) casualties.
- **Objective 5:** To reduce and mitigate the impact of transport-based emissions and noise in Camden.
- **Objective 6:** To deliver an efficient well-maintained highways network and kerb-side space that prioritises the sustainable movement of goods and people.
- **Objective 7:** To ensure economic growth and regeneration is supported by, and supports, a sustainable transport network.

3.8.1. The CTS also commits to developing a FSAP to identify measures to reduce freight/delivery trips by motorised vehicles and their negative impacts, working in partnership with Business Improvement Districts (BIDs) and landowners.

**3.9. [Camden Local Plan \(2017\)](#)** – sets out the Council's planning and strategic development policies over the plan period from 2016 to 2031. Policy T4 (Sustainable movement of goods and materials) specifies encouraging canal,





rail, and bicycle transport, protecting existing waterborne and rail freight traffic, and promoting freight consolidation facilities. At the time of writing this, a new local plan is being drafted for Camden. The new plan includes policy on promoting sustainable transport of goods, services, and materials, including supporting cycle freight, mode-shift to rail and water-based transport, freight consolidation, and updating planning requirements to better plan for deliveries and servicing in local neighbourhoods.

- 3.10. Camden's **We Make Camden Plan (2021)** aims to develop a strong, sustainable and inclusive local economy. This has clear implications for cultivating a sustainable and efficient freight system as the lifeblood of the local economy. It implies that freight and servicing should not only help to improve the quality of people's lives, meet Camden's needs for growth, help businesses thrive, but also be efficient, making the most sustainable use of limited resources, and help deliver our Clean Air Action Plan and Climate Action Plan.
- 3.11. The We Make Camden plan builds on the vision set out in **Our Camden (2025) Plan** that was originally developed in 2018. It emphasises the imperative for creating sustainable places, safe and open communities, as well as strong growth in jobs and housing provision.
- 3.12. **Camden's Climate Action Plan 2020–2025** sets out a vision for achieving net zero carbon by 2030. Transport accounts for nearly a quarter of London's greenhouse gas emissions and is the second biggest contributor to Carbon Dioxide (CO<sub>2</sub>). CO<sub>2</sub> is a key driver of the climate crisis and global heating, threatening human health and livelihoods through extreme weather incidents, such as heatwaves, drought, flooding as well as hindering access to clean water and food security. While London's greenhouse gas emissions have been falling, it is not enough to avoid the worst impacts of climate change. Camden declared a Climate Emergency in 2019 and convened a Citizen's Assembly to help prepare the CCAP, and key actions to address the emergency:
- New planning frameworks should be zero carbon. This means that carbon emissions from freight, servicing and construction activity in new developments need to be carefully considered.
  - Roll out of EV charging points creates more opportunities for electric-powered freight vehicles to be operated across the borough.
  - Closure of Camden High Street to traffic highlights challenges around maintaining efficient freight operations
- 3.13. Camden has recently published a new **Clean Air Action Plan 2022–26** in conjunction with a longer-term **Clean Air Strategy (2019–34)**. Air pollution is the largest environmental threat to public health in the UK. In response, in 2018, Camden became the first borough to adopt the World Health Organisation (WHO) air quality guidelines which, at that time, and set stricter targets for Particulate Matter (PM<sub>2.5</sub>) than UK legal limits. Since then, in 2021, WHO has revised its air quality guidelines with new lower limits for PM<sub>2.5</sub>, PM<sub>10</sub> and NO<sub>2</sub>. Camden has followed suite with a commitment to achieve these revised limits borough-wide by 2034 and which are reflected in the new Clean Air Action Plan and Strategy.



**3.14. The Camden Future High Streets Programme 2021** sets out steps to support the regeneration of our High Streets, and particularly a robust recovery from the pandemic. Target areas include creating sustainable and accessible high streets, incentivising active travel and reducing air pollution. Managing how servicing and freight vehicles move, load and unload in these spaces, as well as taking steps to curb air pollution from freight vehicles will be essential to delivering these outcomes.

## 4. ANALYSIS OF FREIGHT IN CAMDEN

- 4.1. Over [half a million](#) freight vehicles enter London every day; nearly 80,000 enter Camden (Camden screenlines 2019). Most of the HGV use is construction related: construction rates have increased by 46% in the last 5 years to provide the homes and jobs to support a growing population. It is likely that construction will continue around the growth areas (Figure 1) and HS2 works.
- 4.2. [About 80%](#) of all freight vehicles in London are LGVs; in Camden, this is over 85% (Camden screenlines 2022) and represents approximately 66,500 (average) vehicles a day between 2011 and 2019.
- 4.3. While the mode share of HGVs in Camden has remained relatively constant over the last decade at 3-4% of total traffic flow, mode share of LGVs has been rising steadily, reaching a peak in 2021, during the pandemic (Figure 2), when few other journeys were being made.
- 4.4. However, data on actual numbers of freight and servicing vehicles paints a very different picture, particularly for LGVs as shown in Figure 4. Actual numbers of both LGVs and HGVs have been declining in recent years and reached their lowest levels in 2021 – even as mode share reached its highest – and continued the previous pre-pandemic low in 2019.

**Figure 2: Freight and servicing vehicles mode share in Camden**

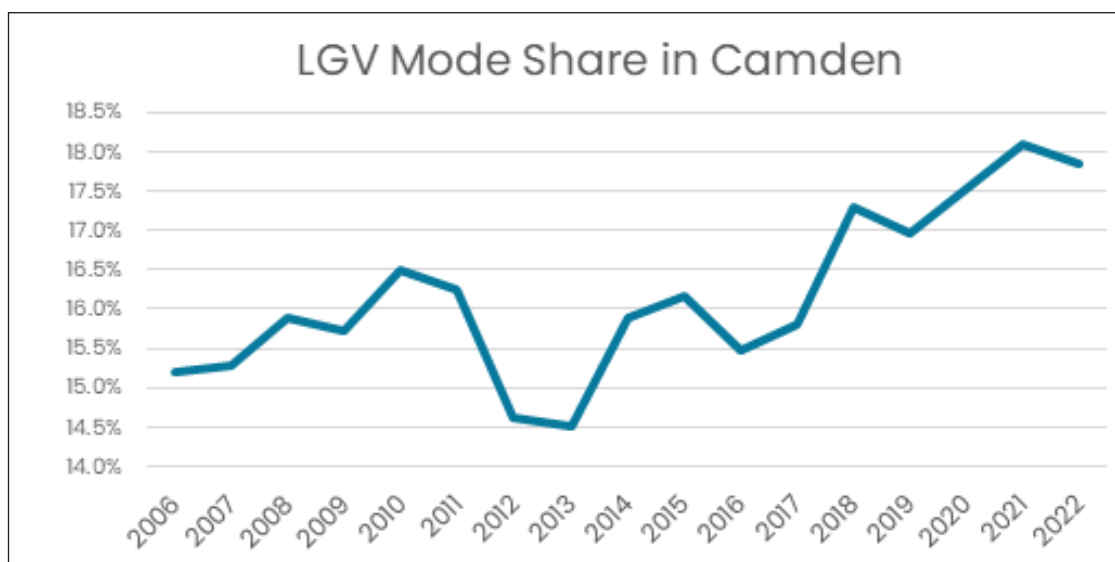




Figure 2: cont.

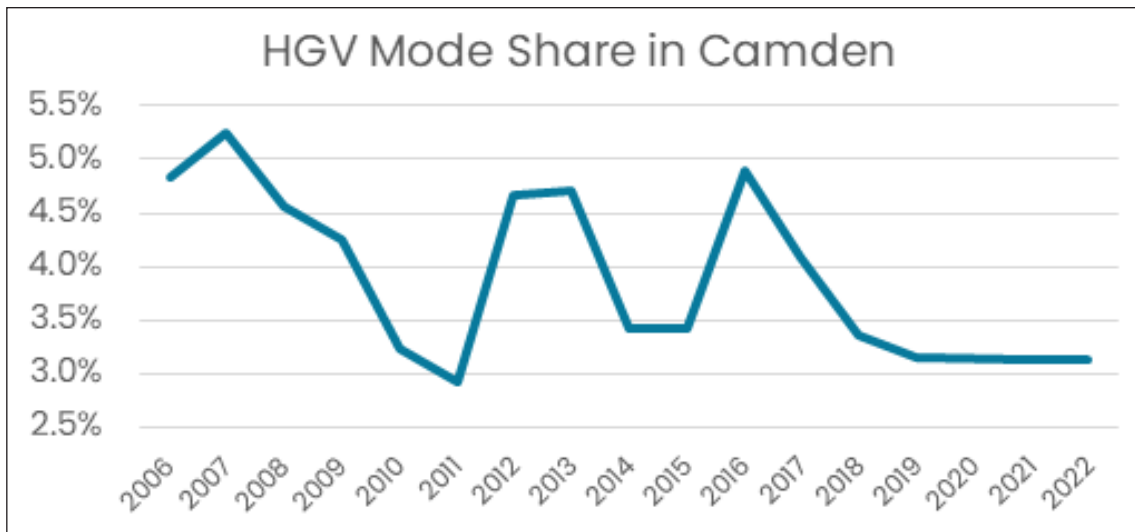


Figure 3: Mode share for HGVs and LGVs in Greater London, 2013 – 2020

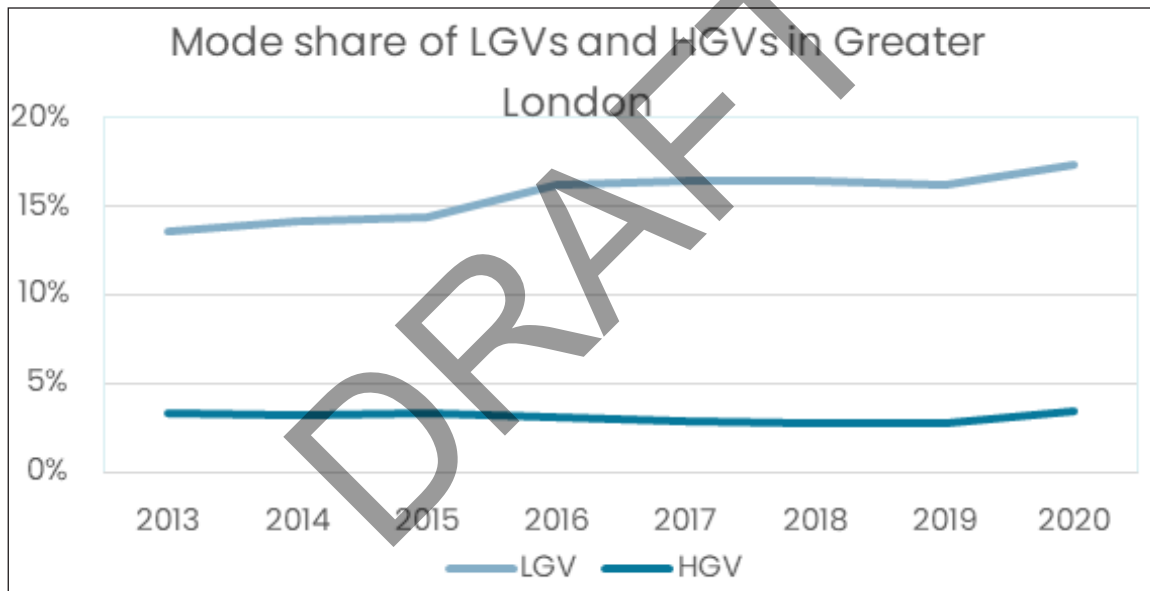


Figure 4: Camden LGV and HGV counts (annual screenlines, 2022)

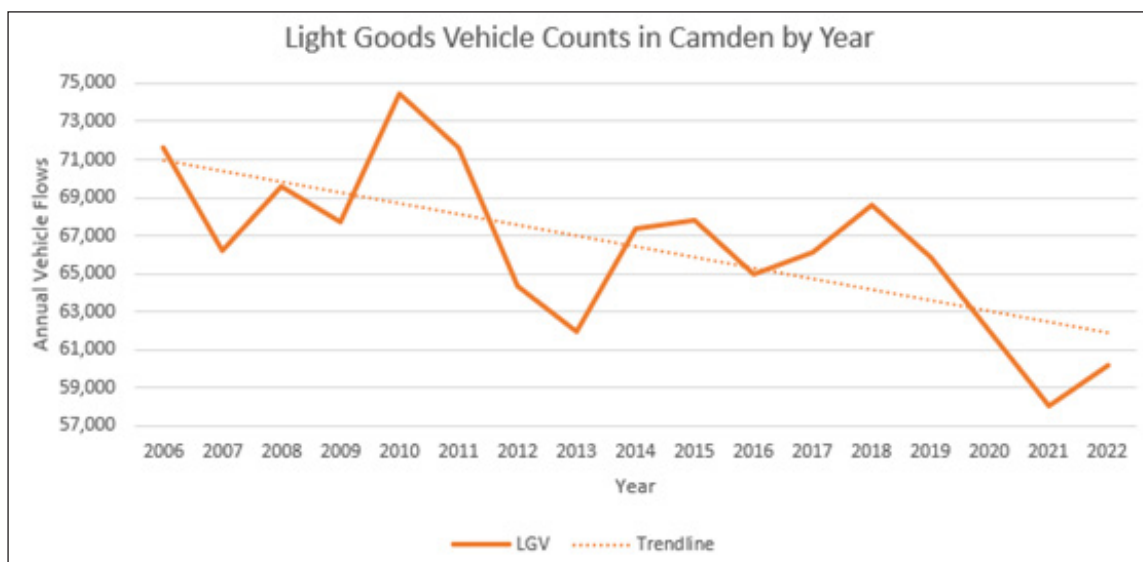




Figure 4: cont.

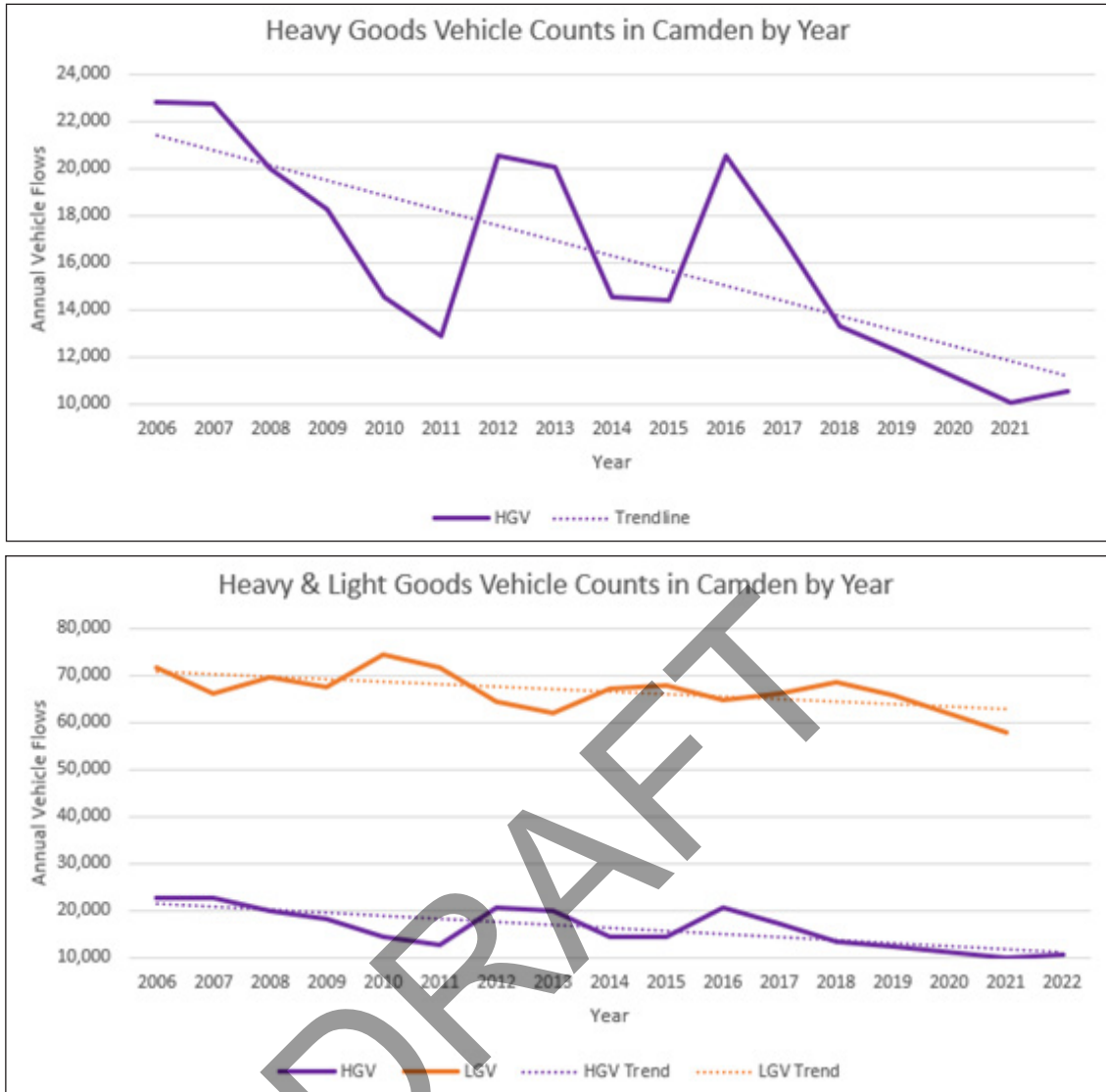
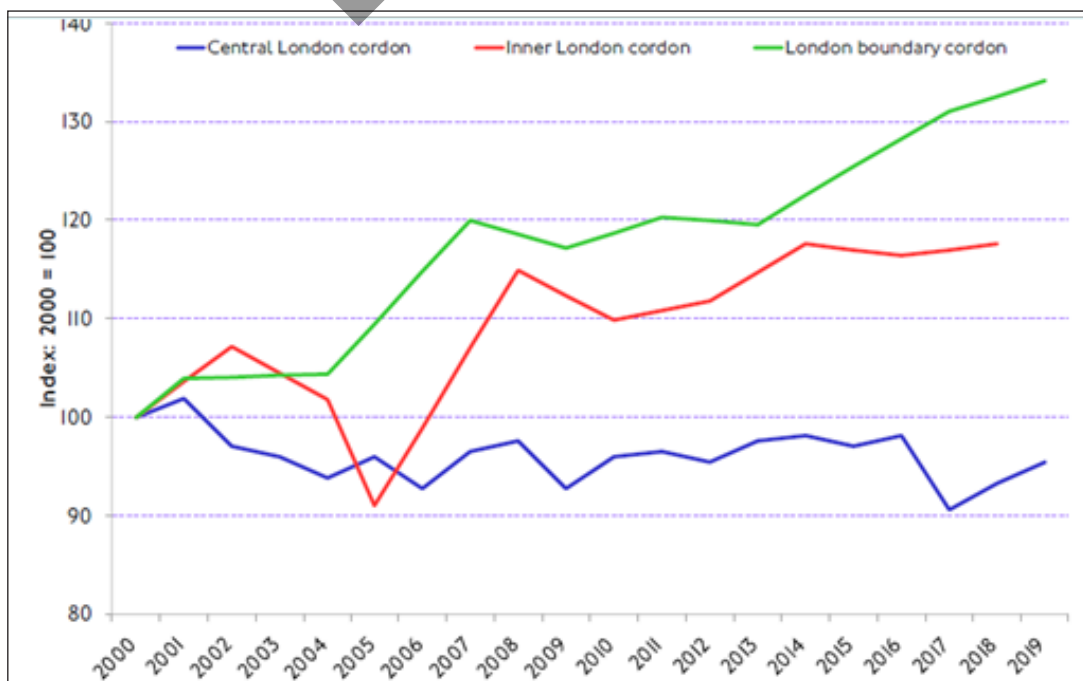


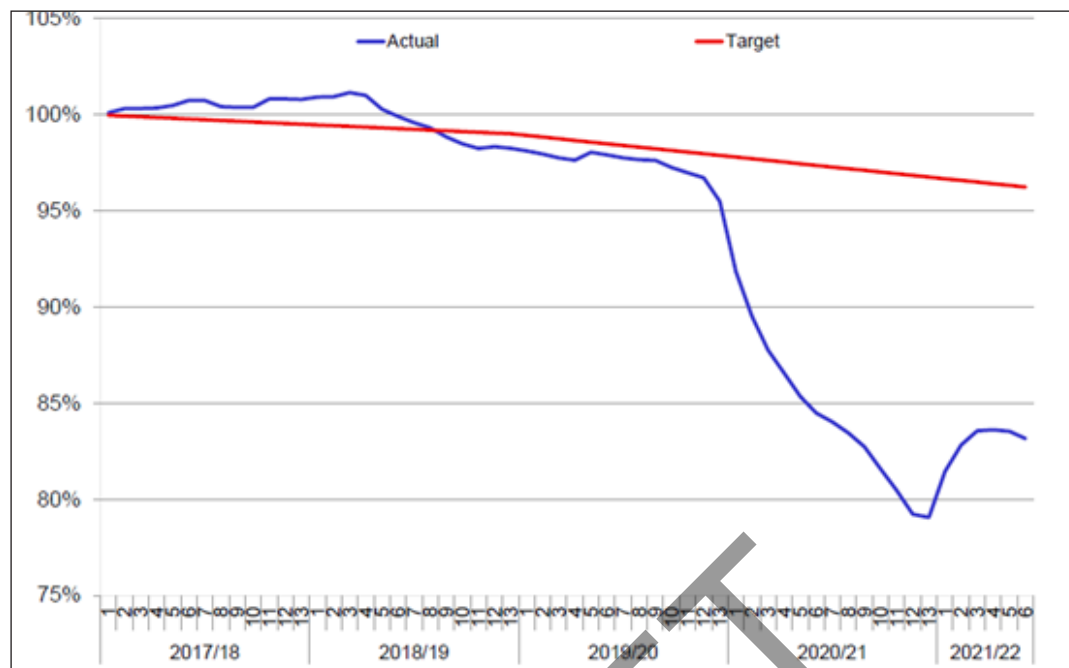
Figure 5: Daily number of LGVs across strategic London cordons 2000-19<sup>1</sup>



<sup>1</sup> Travel in London Report No 14, TfL 2021



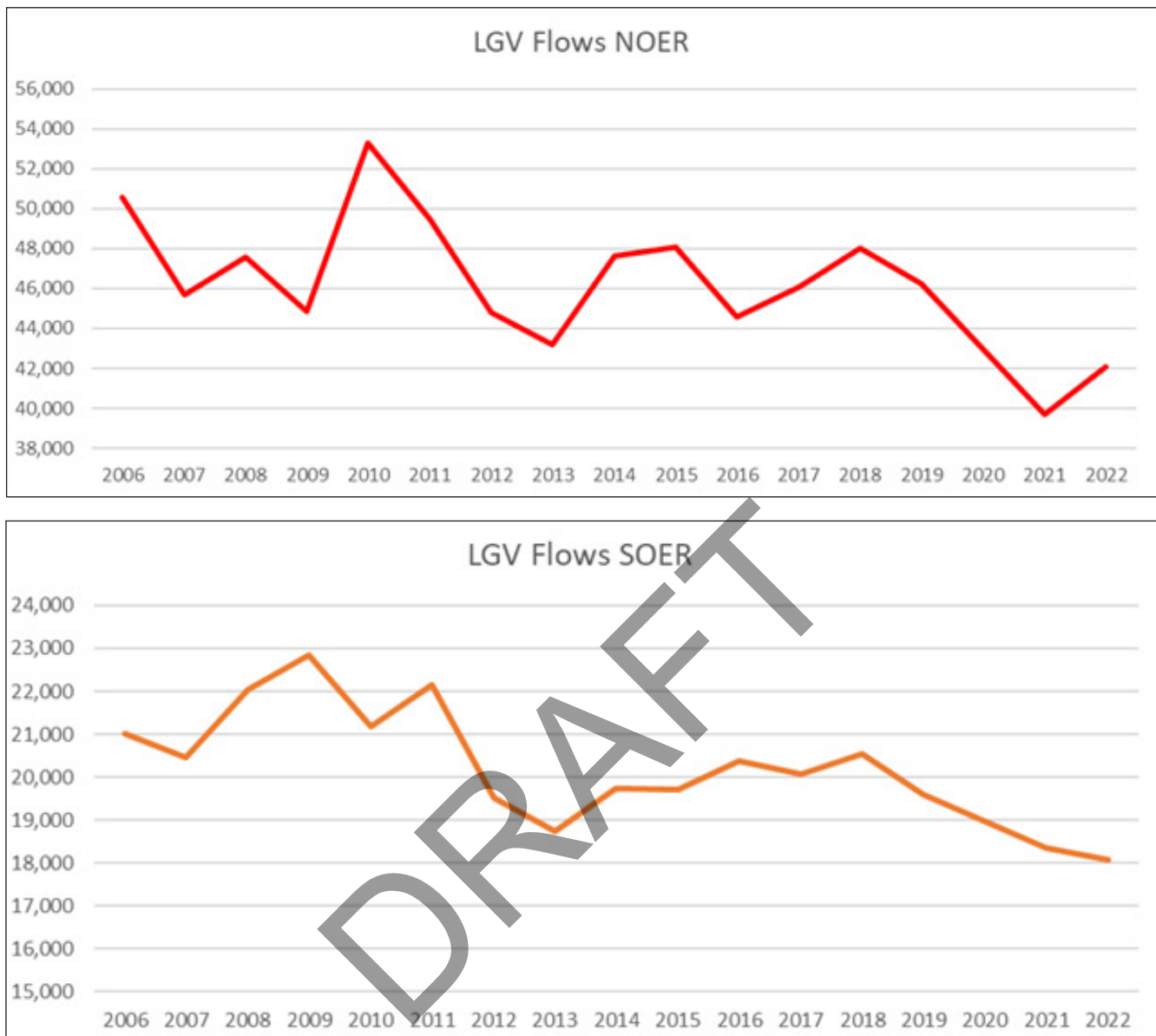
**Figure 6: Freight vehicles entering the Congestion Charge zone relative to 2016, 13-period moving average, 2017/18–2021/22<sup>2</sup>**



- 4.5. Similar downward trend can be seen in data for central London. Figures 4 to 6 show not only that LGV levels are much lower in Central London compared to Inner and Outer London, but also that there has been a downward trajectory in LGVs both in Camden and in Central London for some time. This is also reflected in more recent data for London from TfL (Figure 6), which shows that total freight levels also dropped off significantly in the Congestion Charge zone during 2020–21. While this graph shows data for all freight vehicles, as noted above, LGVs make up the largest proportion by far of all freight and servicing vehicles. So it can be assumed that LGVs reduced significantly during this time.
- 4.6. There was an uptick in both HGV and LGV vehicle volumes in 2022, but these are still far below pre-pandemic levels. While vehicle numbers present a clearer picture on freight trends in Camden (and London), mode share indicates that LGVs play an increasing role in congestion based on Passenger Car Units (PCUs).
- 4.7. Whilst in aggregate, LGV numbers have fallen across the borough, there is likely to be a big difference across the borough due to different land uses between the south and north of the borough. The analysis of Camden's screenline data demonstrates there is a differential in LGV use between the northern and southern parts, as shown in Figure 7. While the general trend is a decrease in LGVs both parts, the number of LGVs is much higher north of Euston Road compared to the south. Without detailed data on specific LGV use, it is difficult to draw robust conclusions on the reasons for this difference. It is possible that this differential may be due to a higher prevalence of e-commerce in residential areas in the north; however, this has to be considered within the context of other pressures such as ULEZ and the congestion charge, which act as a brake on motor traffic flows south of Euston Road.



**Figure 7: LGV traffic flow north and south of Euston Road**



**Morning peak freight flows**

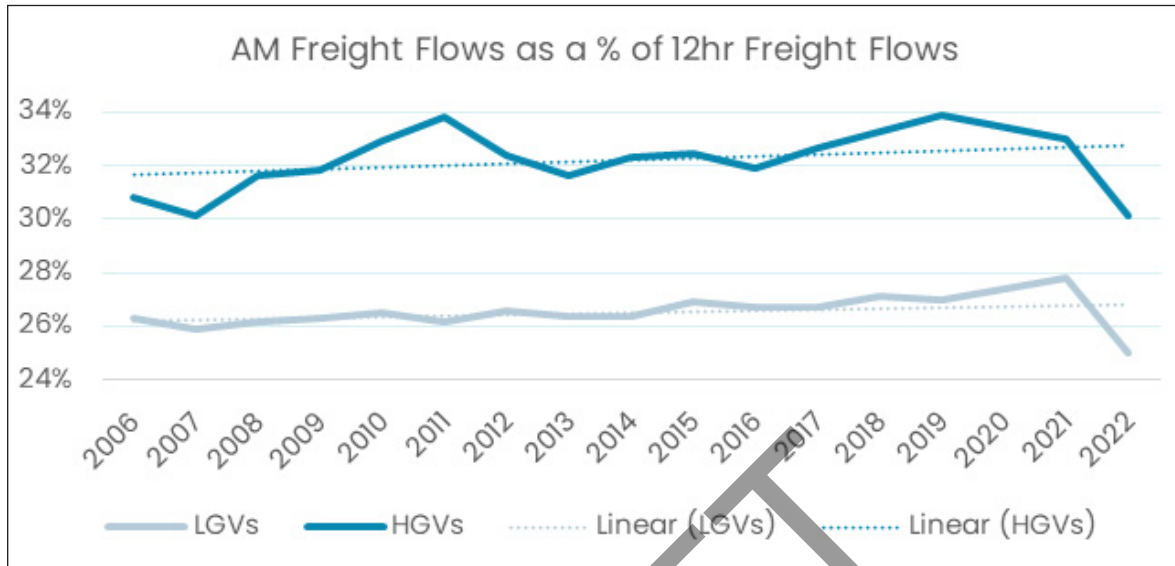
4.8. The Mayor of London has set a strategic target to reduce the number of freight vehicles entering the central congestion charge zone by 10% by 2026 based on a 2016 baseline. Approximately 27% of all freight vehicles enter Camden during the 7 am to 10 am morning peak (average of 2012–2022) in comparison to approximately 22% for Central London (TfL). It is important to note, however, that Camden data is based on 12-hour flows (7am to 7pm) compared to 24-hour flows for TfL analysis. Disaggregated data for LGVs and HGVs (Figure 8) shows that about 26% of LGV traffic and 32% of HGV traffic enters during the morning peak, although the latter represents far smaller numbers. Of interest is that the proportion of all freight traffic entering Camden in the morning peak has remained relatively constant over the last decade.

4.8.1. The peak of nearly 28% of all traffic flows in 2021 is likely to reflect the significant reduction of all types of other vehicles during pandemic lockdowns, particularly private car use as people stayed home. However, as



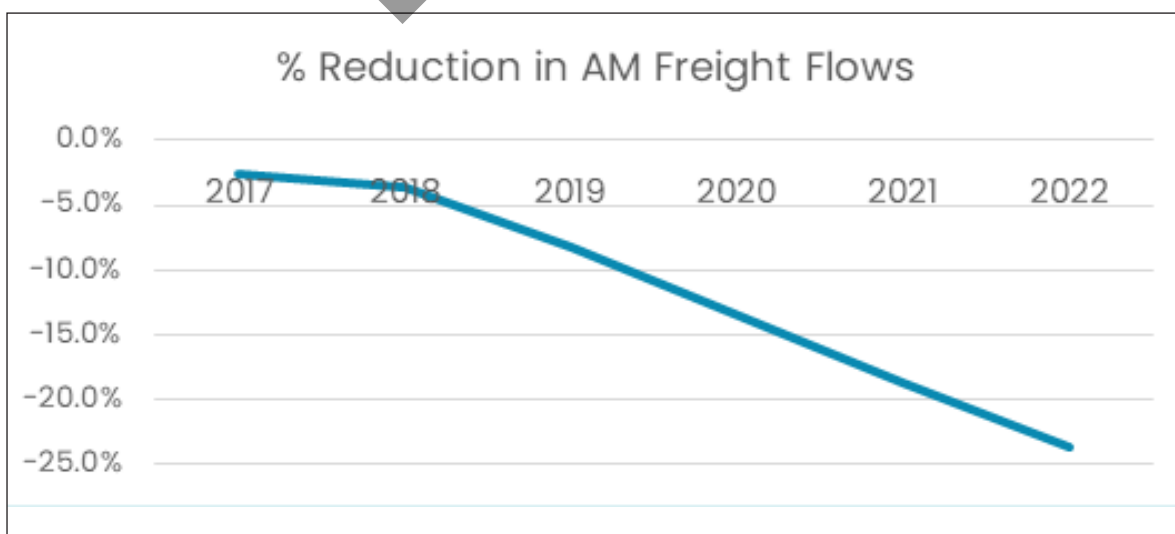
total traffic levels recovered in 2022, the proportion of LGVs in the morning peak decreased – also to its lowest proportion.

**Figure 8: Morning peak freight flows (7am to 10pm)**



4.9. In terms of actual numbers, despite an uptick in LGV and HGV numbers entering Camden in 2022 during the 12-hour period, LGVs entering Camden in the morning peak have decreased by over 23% since 2016 and reached their lowest levels in 2022 (Figure 9). Sustaining this trend over the long term is key to contributing to the Mayor’s target of 10% reduction by 2026.

**Figure 9: Percentage reduction in morning peak freight flows (7am to 10am)**





## Drivers of freight

- 4.10. Construction is a major factor when considering freight and servicing. Boroughs within the Congestion Charge Zone account for two thirds of all construction sites and about 80% of total build size. And while construction is mostly associated with HGVs, LGVs are also prominent in the sector: it is thought that for every HGV required for a construction site, 11 LGVs are needed too, particularly for construction servicing.
- 4.11. A TfL report (Key Drivers of Freight Demand, TfL 2019) notes that the main source of demand for freight and servicing in Central London is office space. For every 10% increase in office floor space, freight vehicle kilometres could increase by 6.3%. It is estimated (TfL, 2019) that between 200,000 and 400,000 office-based deliveries take place each day in London. TfL proposes that servicing of, and freight delivery to, offices is the least efficient freight-inducing land use, resulting from many uncoordinated services and deliveries along with difficulties of accessing delivery and loading bays. Improving the efficiency of freight and servicing to office space would have the single biggest impact on reducing freight kilometres driven through three key actions:
- Improved coordination
  - Routing and data sharing (see Mayor's FSAP)
  - Delivery and Servicing Plan Guidance to improve efficiency (examples include consolidation across companies sharing a building, mode shift for last-mile, and retiming of deliveries)
- 4.12. It may be assumed that the recent growth in e-commerce would result in increased number of LGVs and mileage on the road. However, as Figures 4 to 6 illustrate, this is not the case in Camden or central London. The data shows that e-commerce grew rapidly during the pandemic. For retail alone, online sales as a percentage of total retail sales jumped from 18% to 37% by January 2021 in London. However, contrastingly, LGV numbers fell dramatically in Camden and in central London. Although it is important to note that Camden locations outside the central congestion charge zone may have experienced comparatively much higher LGV flows than within the zone.
- 4.13. This is not to say that future LGV growth driven by e-commerce is not a challenge. First, population growth in itself drives demand for goods and services– both an increase in quantity and in variety. Additionally, the more recent shift in consumer preferences to online shopping, servicing (e.g. laundry services and dry cleaning) and shorter delivery times, naturally creates additional demand for LGV use and increased freight mileage. Freight growth, including increase in LGVs, is happening as more companies move online and race to maintain their competitive edge, offering next-day deliveries, free deliveries, and late cut off times to place orders. All of these tactics reduce opportunities for limiting freight movement and consolidation.
- 4.14. Returns of items bought online is another issue, as well as failed delivery rates (when deliveries cannot be completed), resulting in multiple delivery attempts. There is often no cost to the consumer to order multiple versions of an item and return the unwanted ones. Influencing both the supply and demand side





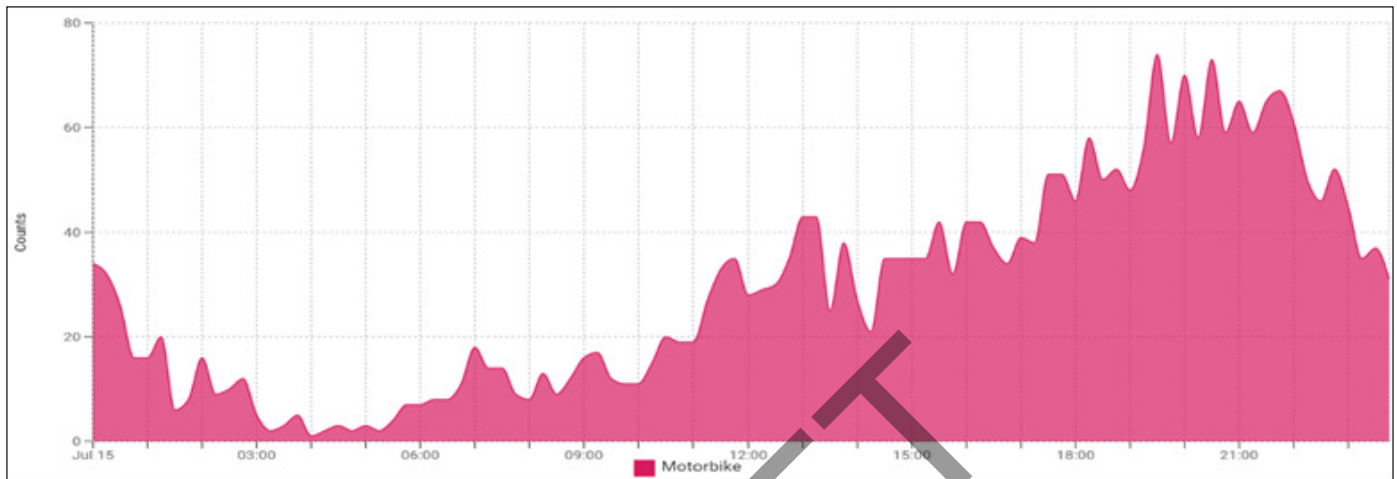
of e-commerce presents a significant challenge to improving freight and its contribution to CTS objectives.

- 4.15. At the same time, the parcel carrier sector is rapidly expanding with numerous new operators entering the market in the recent years to take advantage of the rise in e-commerce. This in turn is pushing the price of parcel delivery down as carriers offer 'free' or next-day deliveries to businesses to gain a competitive advantage. The increase in the number of vehicle journeys needed to support the sector in turn has increased pressure on the public highway – both in terms of traffic flow and congestion and demand for kerbside use. [Journey time reliability has decreased significantly](#) in recent years and it is worse in Central London. Lack of available kerbside space means that drivers have to park further away from delivery points, spending more time on foot to deliver.
- 4.16. As a result, carriers are finding it increasingly difficult to cover their costs – as their delivery prices to retailers decrease but operational costs increase. However, this does offer opportunities to influence parcel delivery to make it more efficient, including completing last-mile deliveries by cargo bike or foot portering. These options will become more attractive to carriers, especially if it helps them reduce their operational costs.
- 4.17. Food delivery companies grew significantly during the pandemic, delivering take-away meals through online platforms replacing traditional in-person collection. Even before the pandemic, in 2019, third-party food delivery platforms could be attributed to an additional [900,000 meals](#) (4% increase) purchased from restaurants. The evidence also shows that third-party platforms have significantly improved the economic position of the restaurant sector, increasing turnover and profits, and reshaping the supply chain. This means that not only are traditional outlets using such platforms to diversify and increase revenue streams, but it has also generated a new type of 'kitchen only' (or dark-kitchen) delivery-focused outlets, allowing existing restaurants to expand and reach new customers beyond their local area.
- 4.18. Most take-away meal deliveries are now made on P2Ws, and to a lesser extent on bicycles and e-bikes. P2Ws support the restaurant and hospitality industry, but also pose unique challenges to the street environment. P2Ws are vulnerable to road casualties, increasing overall road danger in the borough. They place additional demand on streets and kerbside space and contribute to motor vehicle emissions.
- 4.19. Automatic Traffic Counter (ATC) data shows that the trend for night-time P2W use has been increasing for some time: for example, late evening/night time motor cycle flows (between 7pm and 7am) increased by 80-110% between 2013 and 2019 at locations measured. More detailed data from our AI traffic monitoring sensors at specific locations around the borough shows that motorcycle use increases dramatically around 8pm onwards, primarily at high street corridors and town centres. For example, motorcycle flows on Kilburn High Road, Kentish Town Road and Haverstock Hill (Figures 10 and 11) all show the same pattern of significant increases in the evening, attributed to evening take-away food deliveries.

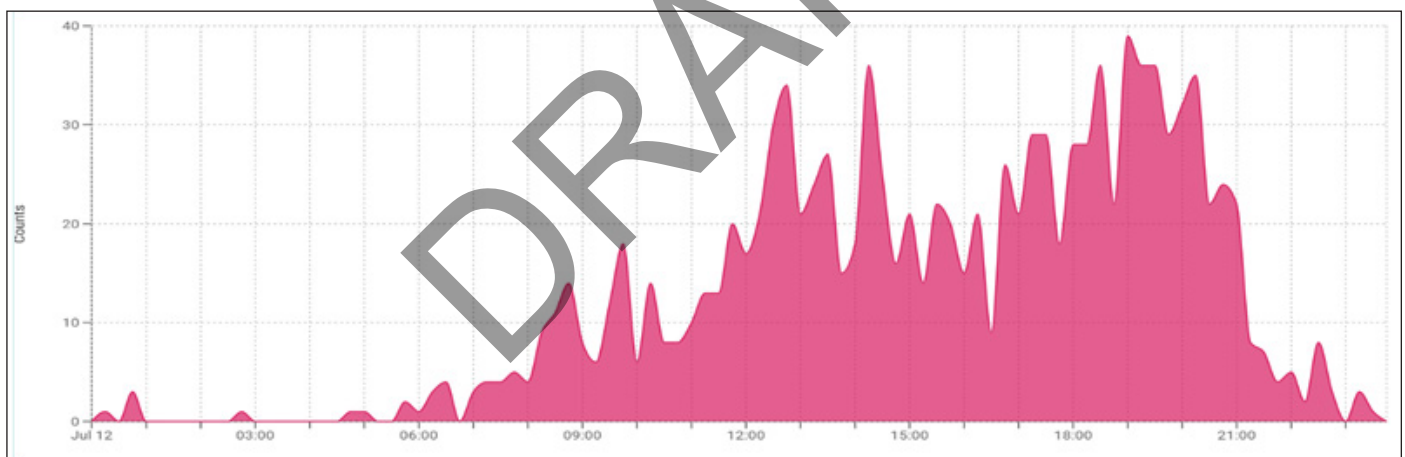


4.20. Similar to LGVs, data shows there are far greater volumes of motorcycles north of Euston Road which is more residential than south of Euston Road which is dominated by commercial and retail development (Figure 12). However, overall the numbers of P2Ws during the daytime and early evening has dropped significantly in the last decade (Figure 13) as captured in Camden’s screenline data covering just the 12-hour period, 7am–7pm.

**Figure 10: Motorcycle flows on Kilburn High Road (one day in July 2022)**



**Figure 11: Motorcycle flows on Haverstock Hill (one day in July 2022)**



**Figure 12: Motorcycle flows north and south of Euston Road (Camden screenline 2022)**

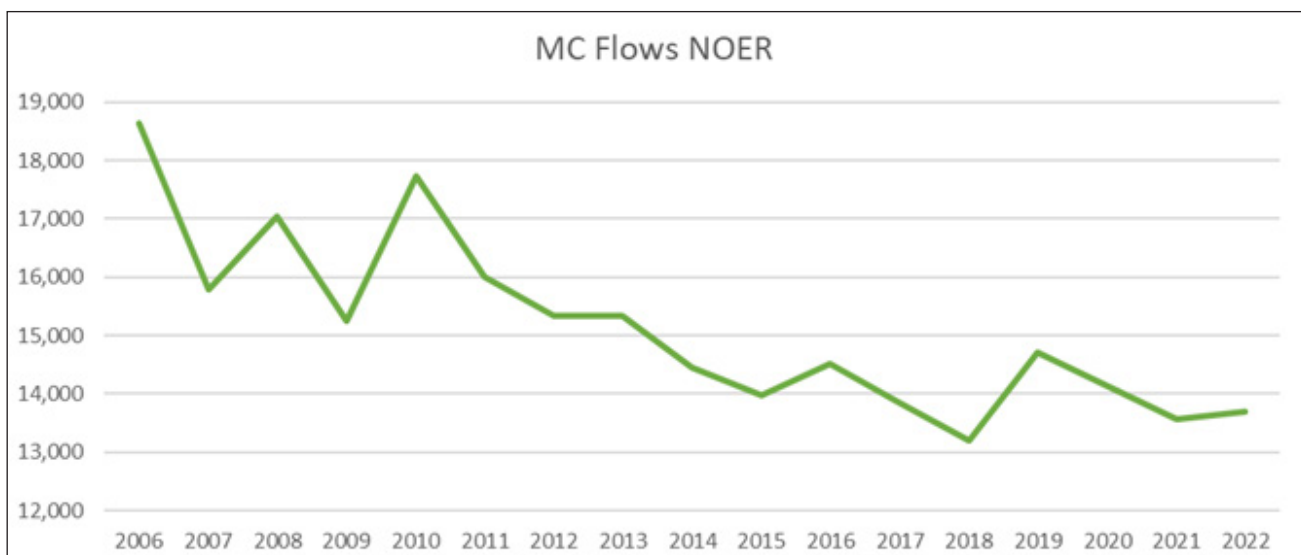




Figure 12: cont.

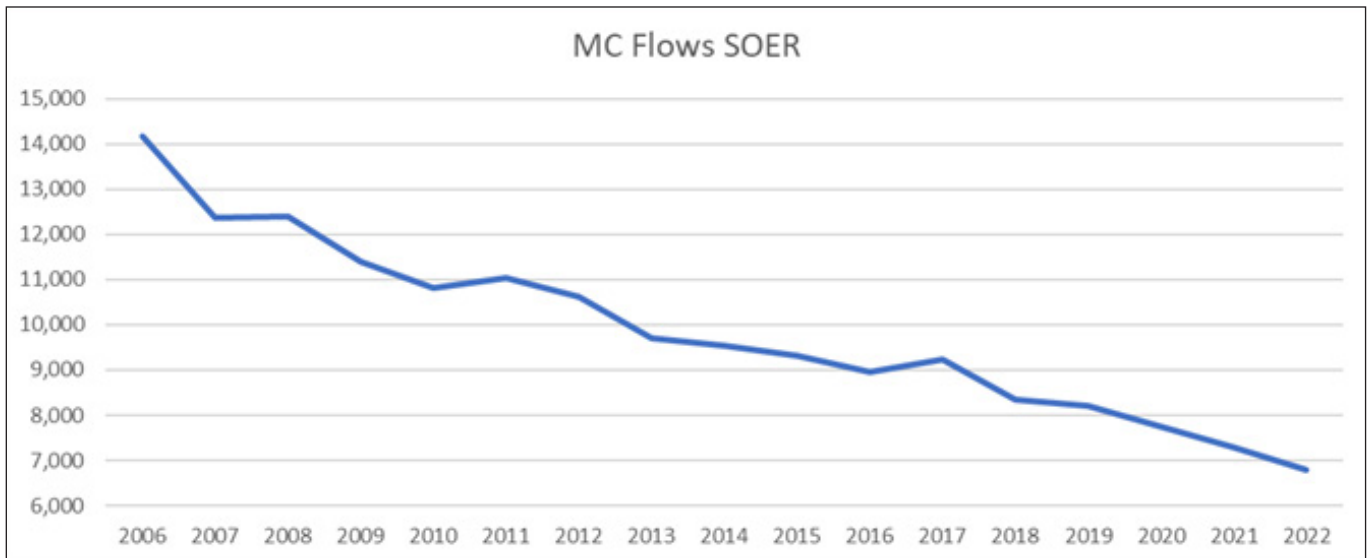
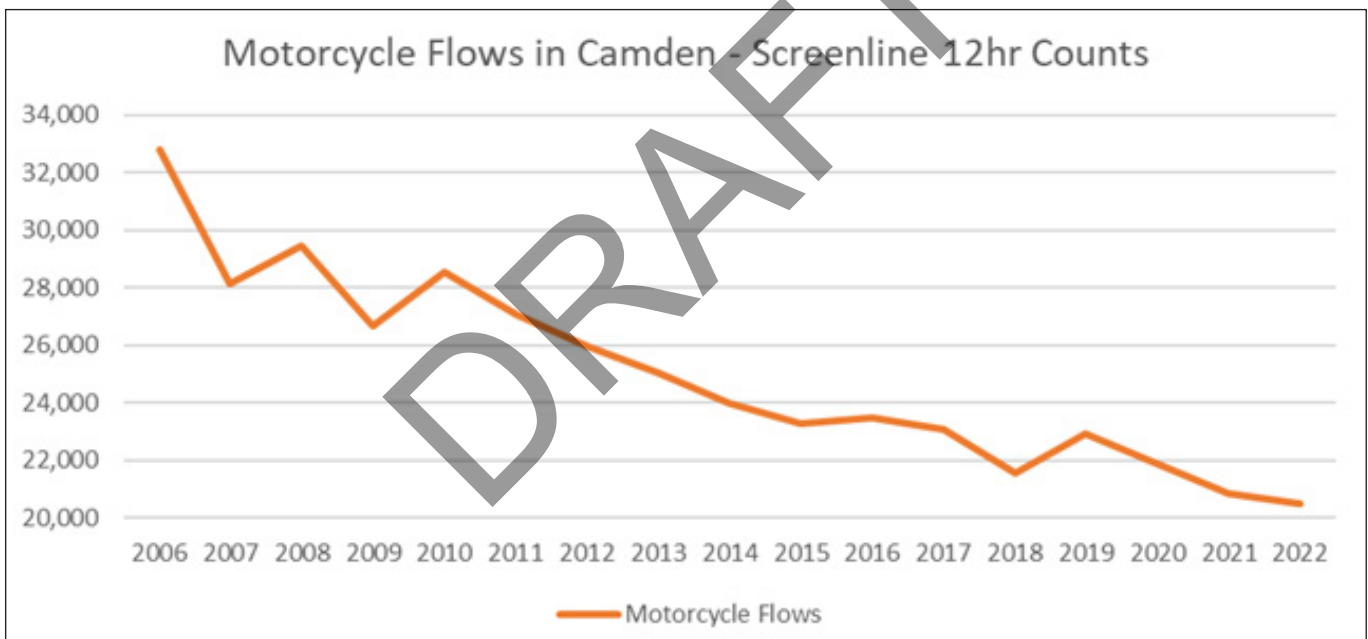


Figure 13: Motorcycle flows in Camden (Camden screenline 2022)



## 5. CHALLENGES

- 5.1. The freight and servicing sectors face multiple challenges, including intense competition for limited kerb space. This section seeks to understand the sector’s contribution to our wider transport challenges as set out in the CTS and other strategies and plans. This will help to identify points of intervention and measures which will deliver Camden’s transport objectives and targets.

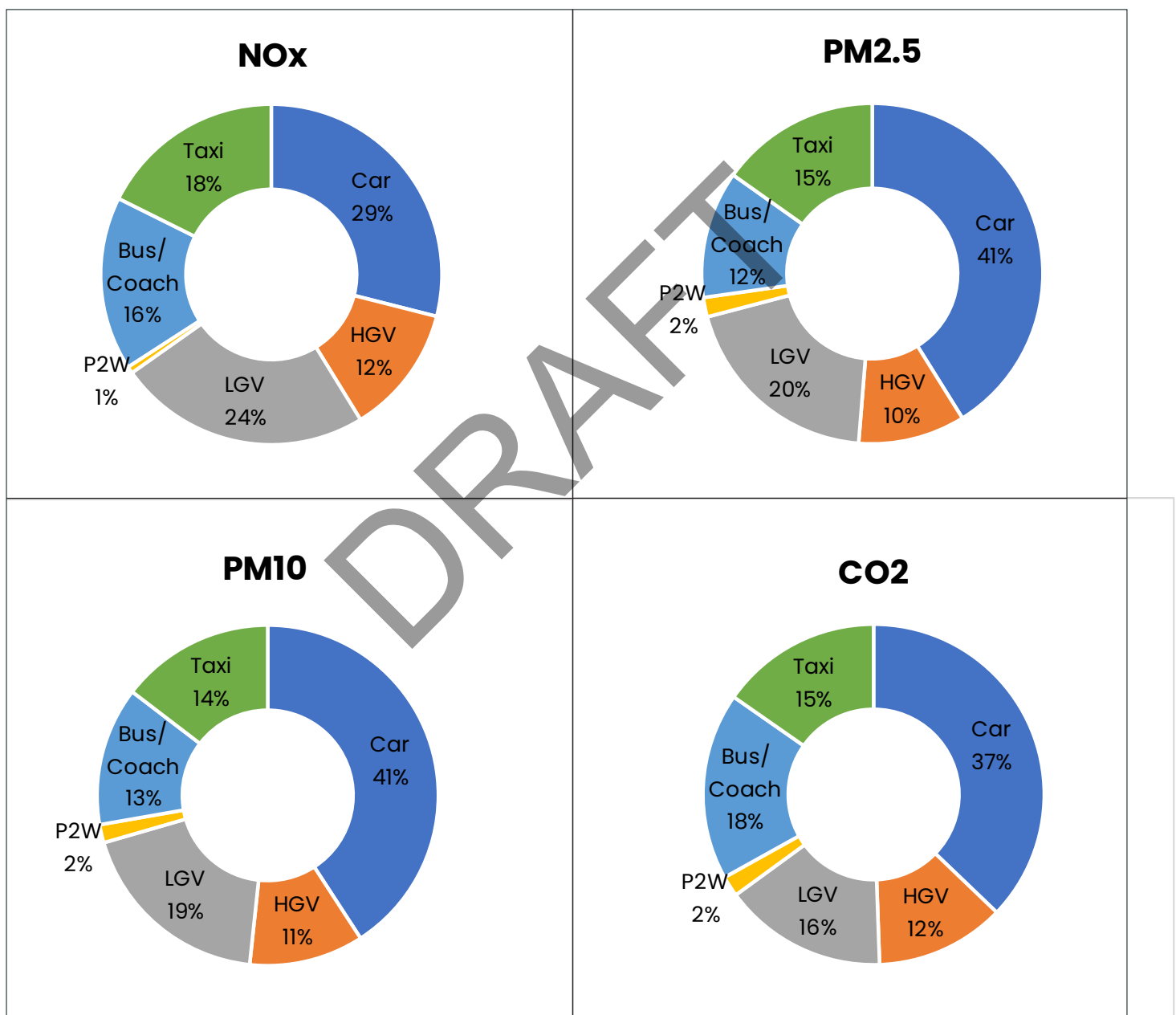
### Air Quality

- 5.2. Poor air quality, particularly from PMs, has dangerous public health implications, contributing to premature death. It is estimated that Camden saw between [99 and 109](#) deaths in 2019 that were attributable to air pollution.



- 5.3. CTS has a strategic target to reduce Nitrogen Oxide (NOx) emissions by 95% and Particulate Matter (PM10) emissions by 61% from road transport by 2041 (compared to 2013 data).
- 5.4. Together HGVs and LGVs contribute disproportionately to poor air quality in Camden (36% of NOx and 30% of PMs from road transport modes) as compared to their mode share. At 28% of total road transport emissions, they also contribute disproportionately to carbon emissions and climate change (Figure 14).

**Figure 14: Emissions from road transport modes<sup>3</sup>**



- 5.5. Managing emissions in the freight and servicing sector is, therefore, going to be key for improving overall air quality, health, and life chances of our population and meeting MTS and CTS emissions targets.

<sup>3</sup> LAEI 2019

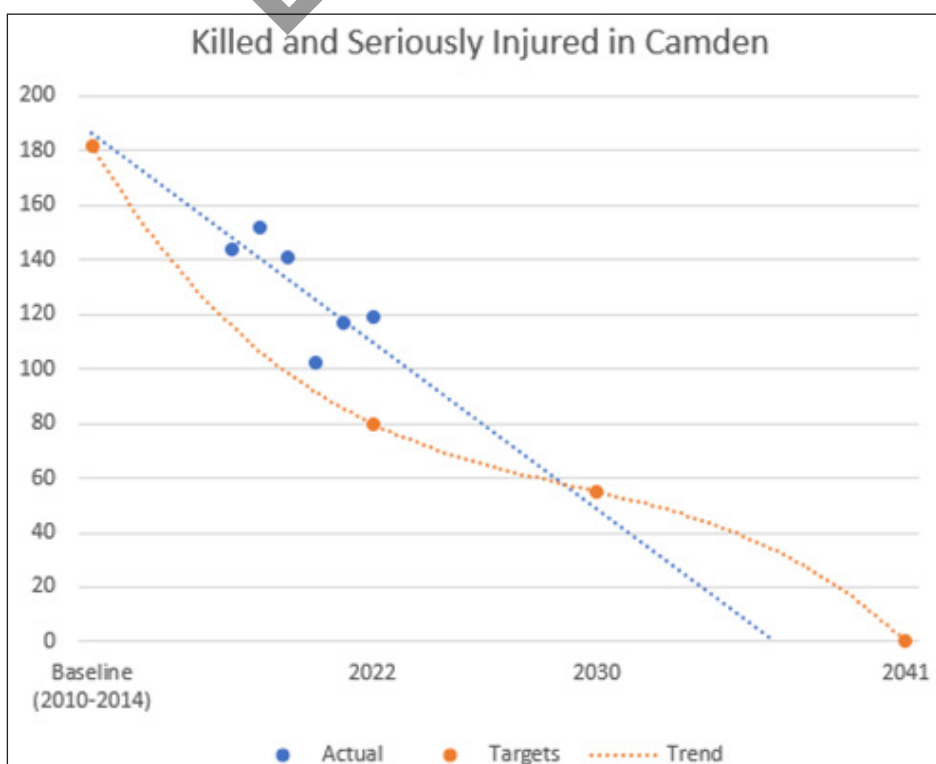


- 5.6. Camden [emission data](#) from London Local Air Quality Management (LLAQM) shows a broad downward trend in pollution concentrations across all pollutant types, with some areas performing better than others. Euston Road, Tottenham Court Road, and Camden Road were some of the areas with the highest pollution levels. Despite this, by 2020, concentrations across key locations were either just above or below target levels set by WHO, which may be due to reduced travel during COVID-19 pandemic. The NO2 concentrations have performed the best compared to WHO targets, while PM2.5 concentrations were the highest.
- 5.7. The contribution that P2W make to emissions in Camden, with an average of 4.4% (between 1.9 – 9.3% in different locations), is generally low as P2Ws comprise a small proportion of total vehicle flows. It is, however, important to note that ULEZ emission standards in London are more stringent for cars (Euro 4 for petrol and Euro 6 for diesel) as compared to motorcycles (Euro 3). As the freight and deliveries increasingly rely on P2Ws for shorter journeys, it is essential to keep tabs on emission contribution from motorcycles and identify opportunities to make these trips more efficient, reducing their contribution to air pollution and carbon emissions.

**Road danger**

- 5.8. Objective 4 of the CTS commits the Council to substantially reduce all road casualties in Camden and progress towards Vision Zero – zero Killed and Seriously Injured (KSI) casualties by 2041. Recent KSI data shows that Camden is on a downward trajectory for KSI and on course to meet this target longer term. However, current data (2022) shows we are well below our milestone interim targets, and the current trajectory shows we will remain so until about 2028 (Figure 15).

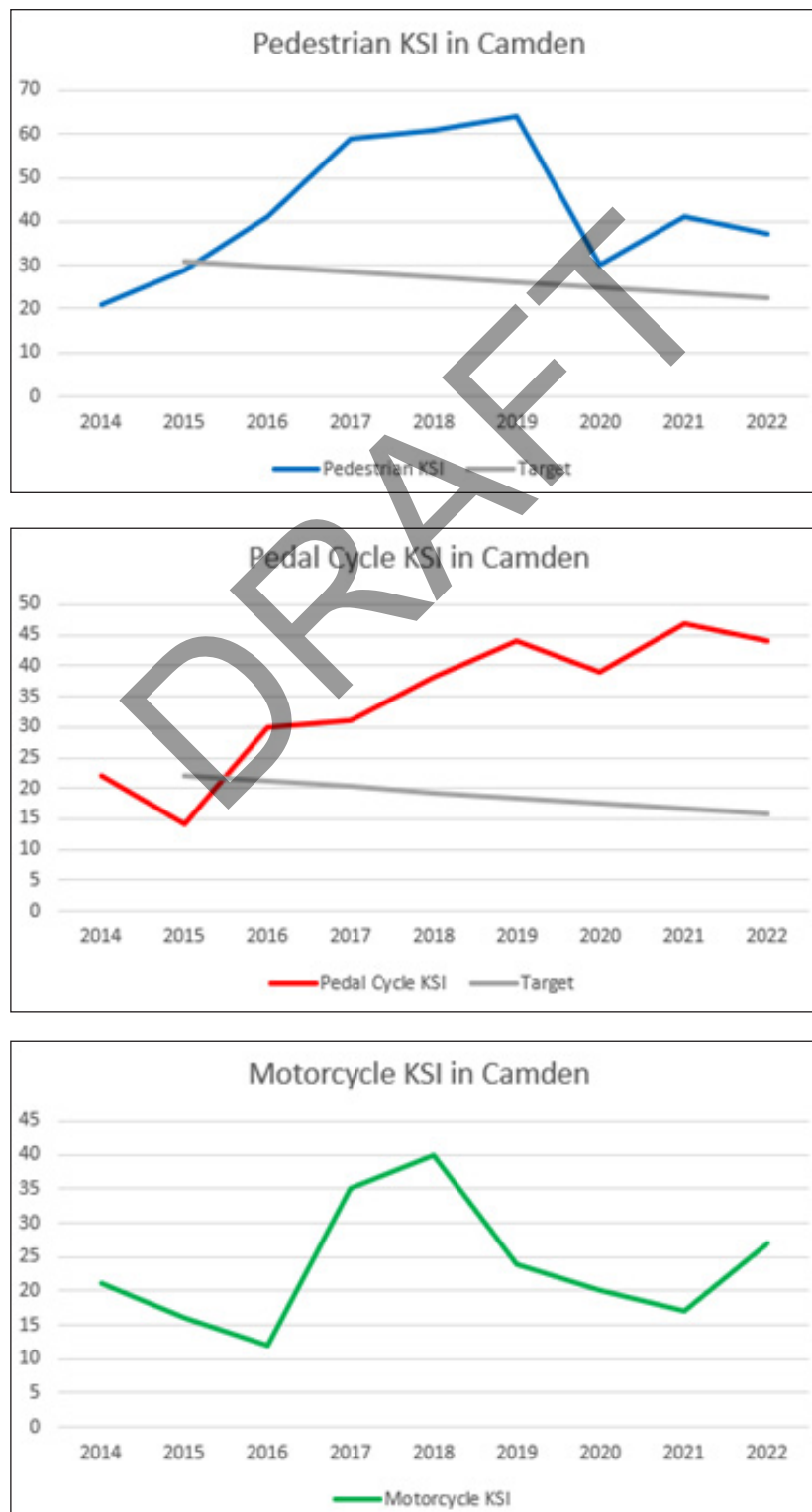
**Figure 15: KSI in Camden**





5.9. In particular, the KSI among pedestrians, cyclists, and motorcyclists are a concern. In recent years pedestrian KSIs have been increasing and reached a five year high in 2019. While they subsequently fell during the pandemic, in 2020, we are now seeing a small reversal and we need to ensure this does not increase further. Meanwhile KSIs among cyclists have been increasing since 2015, barring small decreases during the pandemic and, more recently, in 2022 (Figure 16). KSIs among motorcyclists were on a declining trend from 2018 to 2021. They, however, increased in 2022.

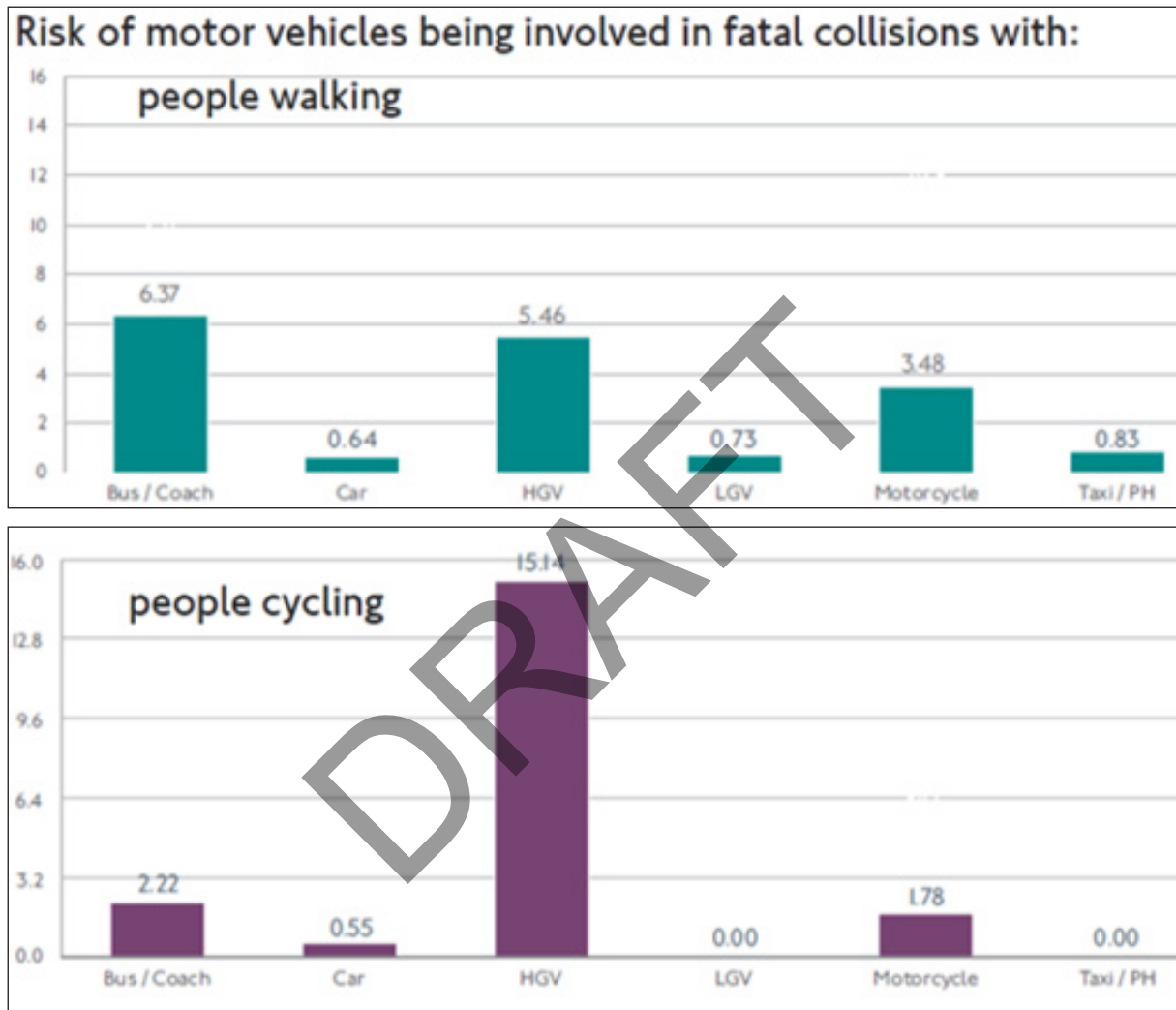
**Figure 16: Pedestrian and cyclist KSIs in Camden**



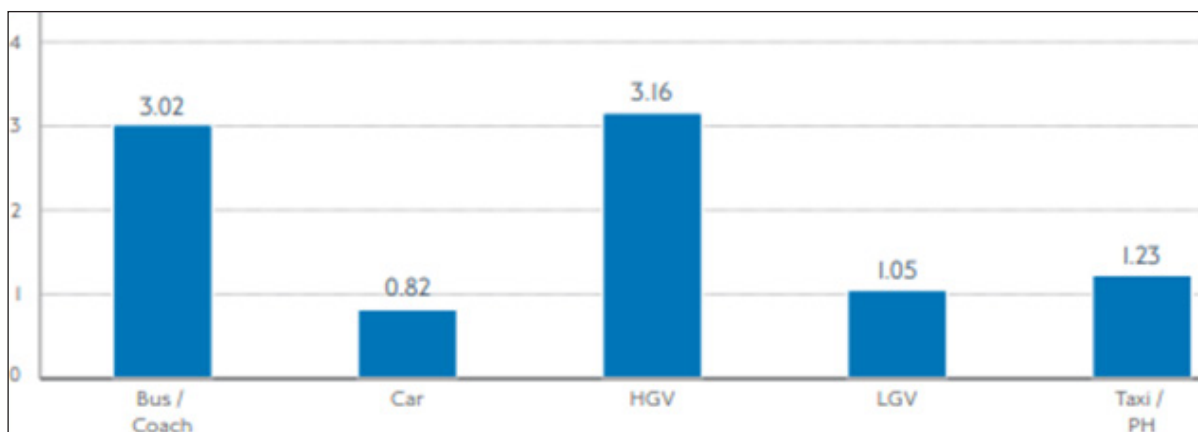


5.10. Data from the [Mayor’s Vision Zero Action Plan \(2018\)](#) shows that, across London, HGVs present the biggest fatality risk, relative to their mode share, to cyclists and motorcyclists and second biggest risk to pedestrians compared to other motor vehicles. HGVs therefore present a significant fatality risk to vulnerable road users (Figure 17 and 18).

**Figure 17: Risk of motor vehicles being involved in fatal collisions with people walking and cycling (2015-17)**



**Figure 18: Risk of motor vehicles being involved in fatal collisions with motor cyclists.<sup>4</sup>**

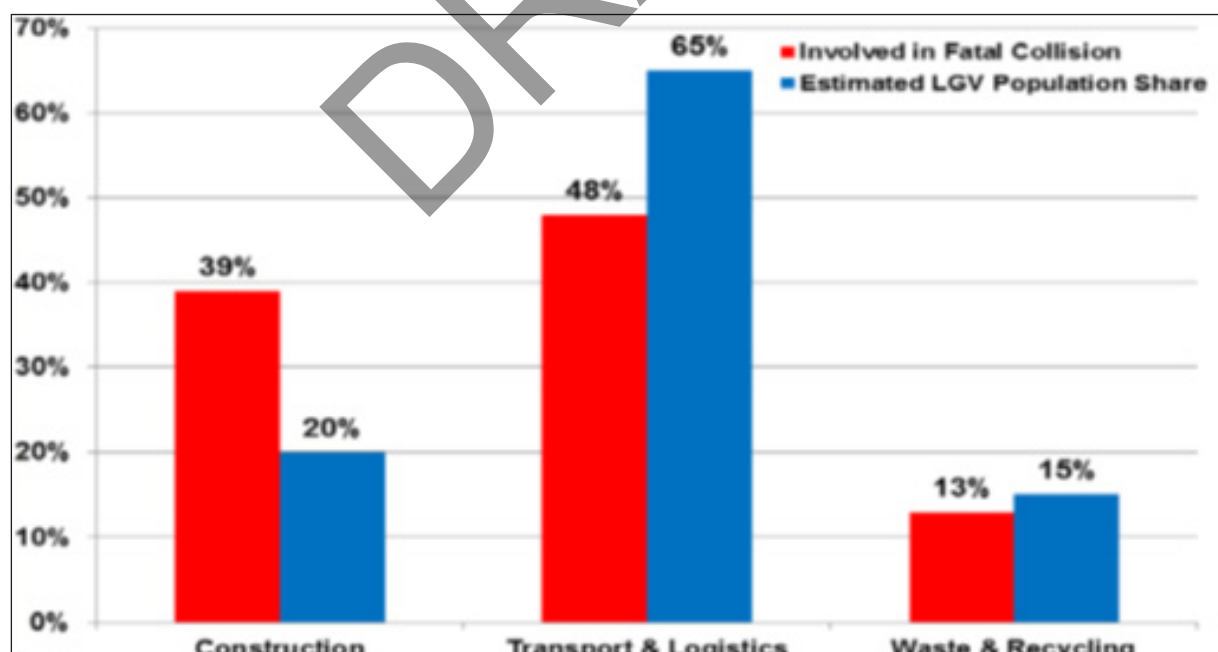


<sup>4</sup> Vision Zero Action Plan, TfL 2018



- 5.11. TfL’s analysis of the data shows that approximately half of the fatal collisions involving an HGV and a cyclist occurred when the vehicle was making a left-hand turn and while a significantly large number of the freight vehicles were travelling at less than 10mph. This suggests that inappropriate speed is not a major contributory factor in HGV collisions with cyclists. Moreover, most pedestrian fatal collisions occur in slow moving traffic, suggesting that HGVs using congested roads in areas with large numbers of pedestrians is a typical risk pattern. Reducing HGV traffic in areas and at times of high footfall and by using improved street and vehicle design, such as the Direct Vision Standard (DVS), are therefore key in addressing road risk.
- 5.12. Analysis by TfL of HGV collision data from 2012–17 shows that, of all HGVs, construction vehicles present the greatest risk (Figure 19). We will need to address this challenge around our growth areas where significant development is taking place. This includes the O2 development site on Finchley Road, the Regis Road growth area in Kentish Town, and all streets affected by HS2.
- 5.13. The KSI data from TfL shows that motorcycles present the greatest risk to pedestrians relative to their mode share (Figure 20). There is a more even spread across all vehicle types for KSIs involving cyclists (Figure 21). After buses and taxis, motorcycles and HGVs are disproportionately more involved in cyclist KSIs relative to their mode share. For motorcyclists, HGVs play a critical role in motorcyclist KSIs, but again only after buses and taxis (Figure 22).

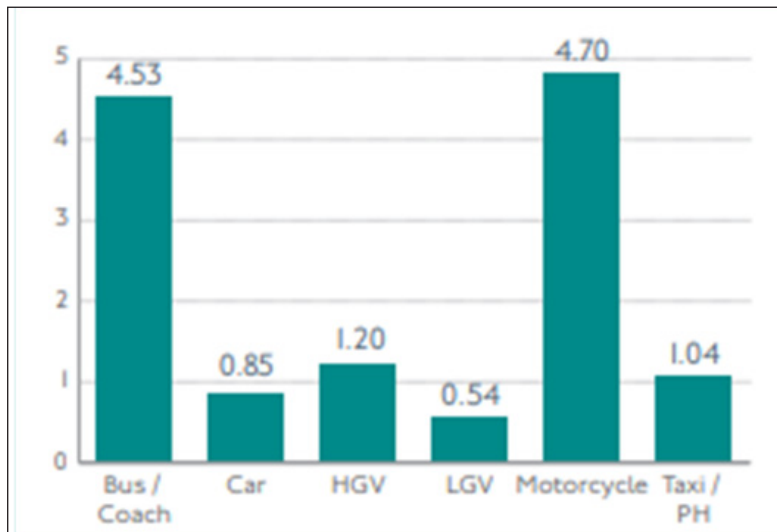
**Figure 19: Risk of fatal collisions involving HGVs by sector**



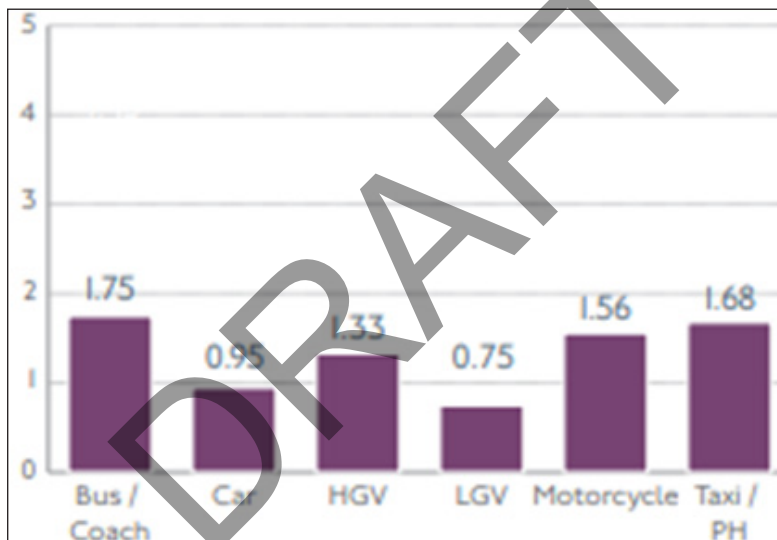




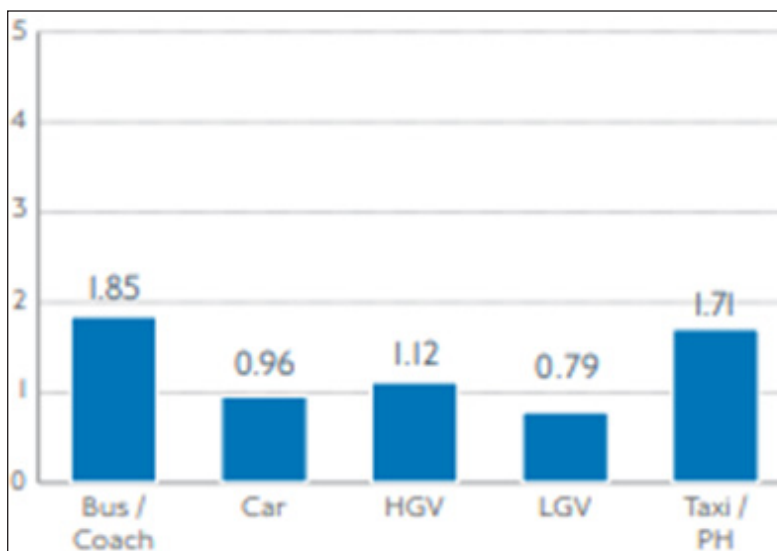
**Figure 20: Risk of motor vehicles being involved in a KSI for people walking<sup>5</sup>**



**Figure 21: Risk of motor vehicles being involved in a KSI for cyclists**



**Figure 22: Risk of motor vehicles being involved in a KSI for motorcyclists**





- 5.14. Speed is a significant contributory factor in KSIs, as also noted in the Mayor's Vision Zero Action Plan. It is a determining factor in the outcome of a collision with a higher likelihood of a KSI casualty when speeds are higher. To deal with the risk of speeding, Camden introduced a borough-wide 20mph speed limit on borough roads in 2013.
- 5.15. Of all modes, P2Ws most commonly break the speed limit in Camden. Of the 130 streets monitored, only 3 locations showed an average speed (all vehicles) above 24mph (for 24 hours). However, in 126 streets P2Ws were recorded to be exceeding 24mph, averaging 45% exceeding this speed. On 43 streets, more than 50% of motor cyclists were exceeding 24mph (even when the average daily speed was below 20mph).

### Congestion and access to the road network

- 5.16. Traffic dominance, growing congestion on London's streets, and subsequent delays, particularly to essential freight, undermine the capital's economy, the quality of the street environment, and the borough's ability to attract the investment to provide the homes and jobs of a growing population.
- 5.17. [Analysis undertaken by Inrix in 2022](#) shows that London ranked the worst for congestion out of 1000 major cities across 50 countries, including in Europe and the US. This includes the number of hours lost to traffic delays and last mile speeds, which amounts to 156 hours lost per year per driver, at an annual cost of £1,377 per driver. Moreover, it represents an increase of 5% in hours lost compared to pre-COVID levels, and a drop of speed to 10mph for last mile.
- 5.18. There are also costs to the city: traffic delays cost London around £5 billion a year, with over £2 billion of that to the freight industry itself. Delays in Central London, including in Camden, are the worst, particularly during the peak hours. This cost is likely to increase as population increases along with the associated demand for goods and services.
- 5.19. With increasing mode share of freight vehicles in the borough's (and London's) motor vehicle traffic, their contribution to congestion is increasing. The carriageway and the kerbside are limited resources. Tackling congestion now and ensuring effective functioning of the borough in the future requires planning and managing the network to prioritise essential users/uses and space-efficient modes.
- 5.20. Dominance of motor vehicle traffic and its associated impacts (road danger, pollution, etc.) can bear on the accessibility of our streets, deterring people from using the street on foot or by bike. Further, it could have an outsized impact on the independent mobility of children, older persons, and disabled people.



## Growth and land use

- 5.21. Camden's population is expected to grow to [226,500](#) people between 2023 and 2033, nearly 1000 additional people per year. Camden is home to the second highest number of businesses in London, after Westminster, and the third highest in the UK. As of March 2023, Camden has [38,420](#) businesses, a majority (86%) of which are small with fewer than 10 employees. The number of businesses increased by 60% since 2016, and the borough is expected to add 60,000 jobs between 2021 and 2041. Based on recent trends, commercial floor space is growing, and there is forecasted growth from large office developments.
- 5.22. The draft new Local Plan seeks to direct development to the growth areas around King's Cross, Euston, Tottenham Court Road, Holborn, West Hampstead, and Kentish Town and to the town centres of Camden Town, Finchley Rd/Swiss Cottage, Kentish Town, Kilburn High Road, and West Hampstead. The Plan allocates sites where development is expected to come forward to deliver new homes, jobs, open space, health and community facilities, leisure, retail and recreation opportunities, together with necessary infrastructure.
- 5.23. Growth and land use impacts freight and servicing in multiple ways. Construction projects, both current and future, to provide the needed homes and jobs will increase demand for freight and servicing both during the construction phases and after completion. A growing population also increases the demand for travel and mobility, placing additional pressure on the transport network and competing with other uses for road space.
- 5.24. Population and job growth have also resulted in scarcity of land and changing land use patterns, particularly the loss of industrial land primarily to housing, office, and retail. TfL estimates that 50% of industrial land in central London has disappeared since 2001. These large-scale changes to land use change the nature of demand on the street network, potentially increasing the need for freight, servicing, and storage spaces catering to these new developments.
- 5.25. The move to e-commerce has also resulted in a shift from traditional brick-and-mortar retail stores to large warehouse storage. It is [estimated](#) that online-only fulfilment uses three times as much warehouse logistics space as retail store-based fulfilment, with the latter splitting their storage between warehouse and store. The result is that more and more goods are stored out of London in more affordable areas, with longer and more frequent journeys to deliver goods in inner and central London. [TfL's data](#) shows that delivery trips to central London now average between 32–51 miles. This is further exacerbated by greater customer expectations of shorter timescales for delivery. Freight operators need land for storage and consolidation close to where goods and services need to be provided to be able to support sustainable last-mile deliveries. Bold steps are needed through the planning process to ensure mixed-use buildings in central London can provide space for storage and that it is not lost to higher value uses.



## Adapting to a changing street environment

- 5.26. Camden's streets are changing. Addressing poor air quality, climate change, road danger, congestion, and inactivity have been long-standing core principals of Camden's transport policies and our efforts to address them have gathered pace in recent years, particularly during the pandemic (see [Transport Strategy review](#) and [three-year Delivery Plan](#)). Nevertheless, many schemes that deliver the benefits of increased physical activity, public transport use and road safety, have an impact on access to the kerbside for motor vehicles, particularly on main roads, and journeys to reach side roads. These initiatives include the construction of protected cycle lanes, healthy street closures, and improving pedestrian sightlines at junction corners.
- 5.27. It is also worth noting that changing street environment may affect servicing differently from loading; whilst loading can take place from Single Yellow and Double Yellow lined kerb space, servicing vehicles are parked for longer periods and are not eligible to park in these kerbside spaces at any time.
- 5.28. High Street pavement space is in demand, with more cycle parking, trees and benches being provided to encourage active transport, whilst businesses are making more use of their private forecourts for displaying their goods, advertising, and seating. These are all considerations when considering how to accommodate cargo bike loading in busy pedestrian environments.
- 5.29. All this means that alternative and more efficient and sustainable alternatives ways of delivering goods and services need to be investigated, including reducing, re-moding, and retiming of the freight and servicing needs of Camden's residents and businesses.