

Freight, Deliveries and Servicing

Would Policy T7, along with policies E4-E7, provide an effective strategic framework to ensure that suitable sites and infrastructure are provided for all types of freight, deliveries and servicing in an integrated and sustainable manner in all parts of London? In particular:

a) are all of the requirements of Policy T7 necessary to address the strategic priorities of London, or

b) do they extend to detailed matters that would be more appropriately dealt with through local plans or neighbourhood plans?

Policies T7 along with E4 - E7 do not provide a sufficiently adequate or innovative strategic framework for planning freight, deliveries and servicing. The promotion of an integrated approach to freight etc., together with enhanced water transport to which road freight should be shifted, both as a strategic aim and policy should be more explicitly stated. The Mayoral Transport Strategy has identified a number of issues, including that freight and delivery vehicles in particular have been increasing their number of trips and are expected to so continue unless proactively managed. Rationalisation is needed. There should be a network of consolidation hubs and managed distribution for the final leg of delivery. Wide area wide restrictions on goods vehicles (other than permit holders) would direct freight into consolidation freight hubs which would manage and rationalize distribution. A surcharge/levy on central London business deliveries could assist reducing congestion.

The Interim Report from the National Infrastructure Commission¹ highlights the negative implications of a lack of strategic policy in this area; in particular: ‘An absolute focus on increasing the supply of homes comes at the expense of a sustainable balance of land uses and supporting infrastructure. Gaps in planning policy and guidance give planners little understanding of why and how to plan for freight, leaving the needs of the freight system far down the priority list. Over time, a lack of holistic, freight-aware decisions will erode the capacity of the freight system to deliver the goods that communities and businesses want and need in the most sustainable way possible.’ And: ‘A recent upsurge in demand for last mile logistics space in London (triggered by population growth, increasing e-commerce activity, and demand for faster delivery times and shorter delivery windows) has coincided with a period of the release of industrial land for non-industrial land uses – most often housing. This was facilitated by a succession of pro-release policies in London planning policy. The limited supply of affordable, suitable premises in central locations means that logistics providers need to look further afield for the right solution.’

Policy E4 A 5) (‘land for sustainable transport functions’) seems to mix two worthy but separate issues: sufficient land for industry, logistics and servicing; and land for sustainable transport functions.

¹ NIC, December 2018 <https://www.nic.org.uk/wp-content/uploads/Future-of-Freight-Interim-Report-2.pdf>

Firstly, on the issue of land for freight, deliveries and servicing any new and upgraded 'intermodal freight interchanges', which reduce overall environmental impacts on residential areas and London as a whole, are supported, including between barges at river/canal wharfs, railway wagons in rail depots, delivery vehicles on London's roads and cargo bikes pedalled on a future widespread network of segregated cycle paths.

However, we remain unconvinced that London Plan policies demonstrate how co-operative innovation will be forced on the highly-competitive (i.e. 'non'co-perative) logistics industry, where every mode transfer, however desirable to Londoners, adds to its costs.

The Old Oak and Park Royal Development Corporation (OPDC), a Mayoral Development Corporation, has promoted a centralised logistics centre concept for the wholly new and massive Old Oak Common development and for the Park Royal Industrial estate, but has not yet brought forward practical proposals. A policy must be deliverable, or it is not credible.

The OPDC shows images of routine drone deliveries in its aspirational images, but they may be undesirable or rare in practice in the foreseeable future, and as unlikely to happen as the robot droid it shows waiting at an Old Oak Common bus stop.

The OPDC is planning to be a very low car-use development, with effectively no through roads in the Old Oak Common development, yet it is unable to explain how a delivery vehicle arriving at the western end of the development can make a delivery in the eastern end (and vice a versa), except by driving through Harlesden town centre's congested one-way system in Brent.

Secondly, on the issue of land for sustainable transport functions, regarding Policy E4 A 5), new and upgraded 'rail and bus infrastructure' is supported 'to support London's economic function' (as well as for other, social and environmental reasons, of course). However, such new use of land may well not be in proximity to areas of logistics, related uses and areas of economic activity.

Rail and bus interchanges have revitalised town centres like Harrow. But they also can be at faltering out-of-town shopping centres like Brent Cross; they can be proposed in new districts of London like Old Oak Common. However, there is also scope for safe enhanced bus interchanges around London where 24-hour supermarkets or out-of-hours commercial and industrial users provide enough visual oversight and there is always sufficient general activity for a feeling of security. This enhances public transport use for industrial and transport workers on shifts.

Policy E5B3: as expressed in its March 2018 response, Just Space is concerned that the Plan's drive for more efficient use of land and the reference of this Policy to Opportunity Areas and working with local authorities outside of London, together with Policy SD2 Collaboration in the Wider South East on scope for 'substitution' of industrial capacity, will lead to the dispersal of logistical facilities. Thus giving rise to longer delivery trips exacerbating inefficient use of land, congestion, loss of local jobs, disputed supply links and adverse environmental impacts, such as air pollution.

Policy T7 Freight, Servicing and Deliveries: National planning policy requires policies and measures that maximise sustainable transport solutions (NPPF29). The promotion of rail and canal for freight, and not just for construction related material, should be an integral part of this policy and rail links/heads and wharfs should be protected and enhanced.

It is not only rail heads that need safeguarding (see Policy T7C), there is an issue around railway sidings and other railway land that become redundant as needs change over the short term. The London Plan should safeguard them for eventual repurposing as parts of widened heavy and light rail or tram corridors or as additional railway depots. What is perceived to be redundant or surplus to present day requirements, may in the medium and long term periods be so required to enable the delivery of transport infrastructure that supports the sustainable functioning of London. At Old Oak what was envisaged by the OPDC to be surplus railway lands has since become the new Crossrail Depot.

Generally, Policy T7 should be more emphatic on planning for and the provision of consolidation centres to transfer loads to smaller 'last mile' vehicles with controls on access by HGVs. To avoid pre-empting the selection of consolidation centre(s) and lorry holding areas sites, there should be transparent objective site selection criteria to ensure the proper planning. This is because such facilities will have significant transport and environmental impacts, potentially beyond the vicinity. These, to include, but not exclusively, such considerations as: the reducing already high levels of air pollution and congestion on existing roads; minimising levels of noise, dust and vibration from delivery and servicing; proximity and ease of access from principal roads, rail and/or canal facilities.