

Future of Freight
Logistics and Borders
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**Department: Planning &
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Via email only to freightandplanningcfe@dft.gov.uk

Response to Freight, Logistics and the Planning System: Call for Evidence

Dear Future of Freight team,

Thank you for giving us the opportunity to respond to your Call for Evidence. Transport for London (TfL) has a dedicated team of freight specialists who liaise closely with the freight industry and have an excellent understanding of how freight issues are addressed within the planning system. TfL are leading the way in the production of freight guidance and standards to ensure that freight can be moved across London in a safe, clean and efficient way.

In line with the Mayor of London's target for London to be a Net Zero city by 2030, support for a sustainable and efficient freight sector is considered essential to London's continued economic success. Sustainability should be integral to freight planning and decision making. This includes building sustainability and decarbonisation objectives into the whole logistics supply chain and providing a planning framework that supports sustainable solutions.

Consideration of land use requirements for freight

London is the largest city in the UK and it is essential that freight and logistics sites are located close to their markets to ensure businesses and residents can be served as sustainably as possible. Government policy should support that the appropriate demand for freight and logistics is met, and Local Plans should specifically show how and where to meet this demand. However, given the land constraints in urban areas, building in the concept of demand management is also important to drive efficiency and innovation. Unless adequate, well-located re-provision is made, land needed for freight and logistics should not be lost to other uses.

Consideration of the way in which freight is carried

More efficient and less resource intensive methods of transporting freight should be used wherever possible to reduce emissions and pressure on scarce road space, for example pipeline, water and rail for bulk loads over long distances and active travel for last mile, using consolidation centres for transfer. Promoting sustainable freight may require financial incentives in the short-term but it also requires a planning framework that protects necessary sustainable freight uses and facilities. It is essential that the freight sector (and new entrants to the sector) can plan, invest, innovate and develop ways of operating that supports zero carbon goals.

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Consideration of how freight customers and employees travel

This includes not just thinking about how goods are transported, but also how workers in the freight and servicing industry travel to their place of work, and the choices made by individual customers to meet their delivery requirements. The planning system should guide the freight and distribution sector towards those choices that align with wider policy aims on zero carbon and do not just focus on short-term efficiencies for individual businesses or consumers.

Appendix 1 provides responses to the specific questions in the Call for Evidence. We would be happy to discuss the issues raised above further and as well as initiatives trialled in London.

Yours faithfully



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Appendix 1 - Detailed Response to Freight, Logistics and the Planning System: Call for Evidence

Question 1

In your view, how effective are local plans at identifying development needs, and then allocating sites, for freight and logistics and how could this be improved?

Question 2

How effective are the policies in national planning policy (Chapter 6) and associated practice guidance applied by plan makers in supporting the needs of freight and how could this be improved?

TfL/GLA response

Background context:

- In London, the London Plan provides a strategic framework for local plans and includes policies on the protection and allocation of Strategic Industrial Land including sites used for freight and logistics given their industrial nature and use class (largely B8). The London Plan designates Strategic Industrial Locations (SIL) (Policy E5) and promotes the designation of Locally Significant Industrial Sites (LSIS) (Policy E6). It also promotes protection for land used for transport purposes including rail and wharf sites which are important for sustainable freight (see London Plan policies T7 and SI15). But SIL and LSIS areas are suitable locations to meet other needs as well, for example for waste apportionment.
- Local Plans in London are required to be in conformity with the London Plan (see evidence).
- The TfL Freight and Servicing Action Plan set out in greater detail how TfL and the GLA will work towards achieving relevant targets and objectives in the MTS (see evidence).

Current situation:

- London has lost 18% of land in industrial use between 2001 and 2020 according to the GLA's Industrial Land Supply study (see evidence).
- Demand for freight and logistics uses appears to increase, partly driven by e-commerce. But industrial demand is often not broken down into different types or use classes as part of the local plan evidence. Local industrial policies and site allocations also tend to not differentiate between industrial uses. Local planning authorities may provide industrial land to meet their demand that is largely suitable for light industrial uses but less for B8 uses such as freight and logistics despite significant demand.
- Industrial developers are finding and developing sites for B8 freight/logistics uses within London. However, there is increasing competition from other uses such as data centres, which are generally classed as B8, and these might be considered less controversial in some locations, as they tend to generate far fewer vehicle

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movements and therefore less impact on the local road network, which paradoxically reduces the need for them to be in industrial locations

- We have seen increased development pressure on sites used for freight and logistics, particularly in high value areas. The loss of logistics land in Park Royal in west London, London Riverside in east London and elsewhere within the capital, is pushing logistics operators further out of London. At the same time London's population is forecast to grow from 8.9 million in 2018 to up to 10.1 million by 2040 (TfL Strategic Analysis, 2023).
- A growing population increases the demand for freight (deliveries, development, servicing). It also increases the need for more housing to meet identified growth. In this context it can be difficult for freight operators, including particularly the ones incorporating more sustainable modes, such as cargo bikes, electric vans, water and rail into their operations, to secure and retain suitable sites due to competition for land. However, a site has recently been secured for a logistics centre at Kingdom Street, Paddington showing that a creative solution can be successful even in areas of high land values (see evidence – case study).

This could be improved by:

- Evidence should more clearly differentiate between the need for different industrial uses including freight and logistics, with some consolidation centres serving a wider area. On that basis local plans and site allocations should positively plan for this use class and specific use (i.e. B8 but with significant transport requirements) to meet demand. A specific use class for freight and logistics could be considered to prevent required land being eroded by competing B8 uses.
- Helping local planning authorities have better visibility of, and data about, the locations of freight infrastructure (as a specific subset of strategic industrial land) at a national level, including any gaps in the network and in relation to strategic routes, flows and capacity. This could feed into the evidence base for Local Plans.
- Building the concept of demand management into freight planning is needed at the national level. Pressures for land will only continue to grow if, for example, the volume of deliveries continues to grow unabated. Behaviour change is needed both for consumers and for the sectors making deliveries. This can include looking for solutions to reduce freight vehicle trips associated with repeated attempts at delivery when people are not home, for example by promoting parcel lockers in developments which could serve the occupiers of the development and also as a delivery hub for the local community.
- The negative externalities from traffic generation on the road network should be recognised and minimised / mitigated.
- When site allocations are proposed for existing well located freight sites, the allocation should take this into account. In some cases, industrial intensification may be possible or co-location of freight with other uses including residential (see evidence – London Plan Policy E7). In other cases, an enhanced freight facility may be better provided on an alternative site, but the onus should be on the developer to ensure continuity of essential freight operations and that any alternative provision does not add significantly to freight miles travelled.

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- Specifically in central London and larger town centres, stronger policies in local plans are needed to support the design and integration of micro consolidation and local delivery hubs served by small electric vehicles and cargo bikes into new developments.
- The Local Plan ‘call for sites’ process should include a specific request for sites that could enable sustainable modes of freight such as cargo bikes that will need access to make deliveries via the kerbside.
- Local plans and design codes should be informed by kerbside strategies, which should be encouraged to make most efficient use of this finite and high demand space (see evidence – kerbside strategy). Sustainable freight operations that are quieter and cleaner, such as zero emission vans, smaller distribution hubs and cargo bikes may be easier to co-locate with residential use/development than some of the more traditional types of operation.
- Chapter 6 of the NPPF does not mention freight specifically, only ‘storage and distribution operations’ which is logistics/warehouses. This section of the NPPF could be more specific and aimed at encouraging sustainable movement of freight and deliveries.
- The NPPF should encourage more effective safeguarding of, and provision for freight and industrial land in local plans to meet identified demand and provide protection for those sites that are best able to support sustainable freight eg sites for electric bus garages which share many of the characteristics of sites that are well placed for freight transfer or consolidation including last mile hubs in central areas. At the same time there may need to be the release of sites historically used for freight but are no longer suitable where residential development might be more appropriate.
- The modal shift from road-based freight to rail and water freight should be pro-actively supported (see example case study on Bexley Riverside Energy Park)
- It should be recognised that there are also a range of other needs including support for small businesses and start-ups that require a mix of unit sizes or affordable workspace, where this is identified as part of the local evidence base.

Evidence, specific examples, links

- [The London Plan | London City Hall](#) Policies:
 - E4-E7 – address the need to meet industrial land demand, industrial designations as well as industrial intensification, co-location and substitution to facilitate land use efficiency and consolidation.
 - SI15 addresses the safeguarding of wharves for waterborne freight
 - T7 addresses the protection of railheads through local plans
- [Freight and Servicing Action Plan](#)
- [London Industrial Land Supply Study - London Datastore](#)
- see also [Centre for London | Making Space: Accommodating London’s industrial future](#) (2022), which highlights the scale of loss of industrial floorspace and recommendations to address this.

- Case study: Kingdom Street, Paddington site Westminster City Council planning application reference 22/08571/FULL. This used vacant railway land known as the 'Crossrail Box' adjacent to Paddington Station, for an urban logistics and distribution hub. Encouraging the use of smaller unused parcels of urban land for distribution centres in this way could help to serve the expanding population's needs, but may need help from planning policy on design, locations, viability and financial considerations.
- [Kerbside strategy from Lambeth.](#)
- Case study: The Bexley Riverside Energy Park: The GLA, TfL and LB Bexley negotiated 75 % of waste to be transported through an existing jetty at the Park rather than by road, given that the infrastructure was in place and had the capacity to accommodate increased waste transfer by river.

Question 3

How effective is engagement between industry and local authorities in the course of local plan-making? How can this be improved?

TfL/GLA response

Background context:

- In our experience, there is a lack of engagement by the industry with the local planning process, in particular when compared to the level of engagement from housebuilders and mainstream commercial developers such as supermarkets.

This could be improved by:

- Encouraging greater engagement from freight operators in the local plans process. This could be done by including a short new NPPF paragraph that gives them a hook into plan-making, e.g. 'Planning policies should recognise and seek to address the development needs of freight and logistics infrastructure to support a sustainable and right-sized freight / logistics industry' and then encourage the freight sector, particularly more sustainability-driven operators, or a representative group to engage in local plan-making to make sure they are contributing the evidence needed to inform effective policy making.
- Some sites can best be considered at a strategic level such as rail freight sites. If a site provides regional strategic infrastructure, it should be considered on that basis which will require planning across Local Planning Authority boundaries and recognition of the wider economic benefits of freight. The London Plan and sub-regional plans elsewhere provide a mechanism to identify and provide for strategic freight transport requirements, but they will also need to be translated into Local Plans.
- Groupings/boards that support collaboration across the sector (see evidence – Industrial and Logistics Sounding Board)

Evidence, specific examples, links:

- Industrial and Logistics Sounding Board: Jointly with Business London, CBRE and SEGRO the GLA is managing this Board to bring together key stakeholders with

an interest in industrial and logistics development including local planning authorities to jointly consider how to address relevant challenges. The Board was originally set up to support the preparation of the London Plan and is now focusing on its implementation. The decarbonisation of freight is one of its current workstreams.

Question 4

How effectively does planning currently support efficient use of established freight and logistics infrastructure? How could it better support existing infrastructure?

TfL/GLA response

This could be improved by:

- Increased awareness and application of the agent of change principle (NPPF para 187) when new developments are proposed close to existing freight sites (see also evidence – London Plan Policy D13). Often the main barrier to efficient use of infrastructure is noise and amenity conflicts with neighbouring developments, including where the latter has come to an area where freight uses are already established (see evidence – case studies at Angerstein Wharf, Bow Goods Yard and Wandsworth Town).
- Better guidance for mixed use developments including co-location of freight with other uses where appropriate, promotion of logistics hotels where packages can arrive and be stored before distribution to residents, consolidation centres, last mile hubs, provision for cargo bikes and embedding sustainable methods of delivery and servicing into planning decision making – currently these are relatively poorly understood and often not implemented effectively in practice by developers. This could be supported by e.g. proof of concept, perhaps with some initial support for pilot projects and dissemination of best practice. London is well placed as a test bed for some of these concepts (see evidence – case studies at City of London and Centre for London research).
- The reuse of surplus, under-used or poorly located car parking for freight should be encouraged. There could also be greater freedom to allow a temporary use of land within a site for making deliveries such as a temporary loading bay.
- Better protection for rail, water and road freight infrastructure to transport goods. In London rail heads/terminal benefit from local protection promoted by the London Plan (Policy T7) while safeguarded wharves provide strategic protection for water freight (Policy SI15). However, some wharves are nevertheless at risk of residential development given their attractive waterfront locations.

Evidence, specific examples, links:

- London Plan Policy D13: The agent of change principle includes detail on mitigation through development proposals.
- Case study: The operator of a site at Angerstein Wharf in Greenwich claimed that if their operating hours were reduced by one hour, they would need to reduce operations by one train a day which in turn would lead to an additional 1,000 extra Heavy Goods Vehicle trips a day. However, there was strong local support for such a planning condition to restrict hours of operation and it is difficult to test the

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operator's assertions, meaning decision making is tricky and compromise is almost always necessary.

- Case study: Network Rail proposals for housing close to the railhead at Bow Goods Yard (see Site Allocation SA4.5 in [London Legacy Development Corporation Local Plan 2020 – 2036](#) and corresponding [Sites Report November 2018](#)).
- Case study: LB Wandsworth proposals to downgrade SIL near rail infrastructure at Wandsworth Town – [see section on Battersea Design and Technology Quarter](#)
- Case study: City of London requiring large schemes to have an off-site consolidation centre (eg [Sustainable Deliveries at 22 Bishopsgate to Lower Emissions \(twinfm.com\)](#))
- Case study: City of London providing space for Amazon for an urban logistics operation ([City of London Corporation teams up with Amazon to cut delivery vehicles and improve air quality](#))
- Case study: British Land converted the unused Crossrail basement box into a logistics centre for approx. 13 lorries in with everything out by cargo bike [British Land secures planning for 120,000 sq ft net zero urban logistics hub serving central London with low carbon deliveries | British Land](#)
- [Centre for London | Worth the Weight: Making London's deliveries greener and smarter](#) (2021)

Question 5

How should freight and logistics be factored into statutory Local Transport Plans and sub-national transport strategies?

TfL/GLA response

Background context:

- The Mayor's Transport Strategy and London boroughs' Local Implementation Plans aim to prioritise freight use ahead of private vehicle use when allocating scarce road space. They also promote accredited road safety schemes to ensure that safety and sustainability are integral to freight operations. Some of these voluntary schemes such as the Fleet Operator Recognition Scheme (FORS) and Construction Logistics and Community Safety (CLOCS) (see evidence) could be replicated in in Local Transport Plans and sub-national transport strategies beyond London. Making sure that road freight can operate safely and responsibly, and are seen to be doing so, could be an important means of increasing positive perceptions of freight to local residents.
- The planning system has a role to play in encouraging engagement across administrative boundaries, given that logistics networks go beyond these boundaries.

Evidence, specific examples, links:

- Voluntary schemes:
 - [Fleet Operator Recognition Scheme](#)

- [Construction Logistics and Community Safety](#)

Question 6

What aspects of the applications and decision-taking process work well and what aspects do not work well?

TfL/GLA response

Background context:

- In London, TfL is a statutory consultee on applications referred to the Mayor of London and seeks through its pre application advice service to protect important freight and logistics sites and embed sustainable freight practices.

Current issues:

- Sites without on-site servicing can lead to negative externalities once a development is complete such as vans parking at inappropriate locations to make deliveries.
- Opportunities may be missed to consolidate freight movement and deliveries across several sites because there is no method of enforcing co-operation between developers. Collaboration between freight operators could be promoted through the National Freight Network.
- Speculative applications for change of use of existing freight sites may not be resisted even where the site is important for continued freight use unless it is specifically protected through the Local Plan.

This could be improved by:

- Prioritising on site servicing needs including provision for cargo bikes, electric vehicle charging ahead of general car parking, and making this expectation clear in the NPPF that servicing should take precedence over car parking.
- Requiring, monitoring and enforcing Delivery and Servicing Plans that prioritise use of active travel for last mile deliveries and collection, following London's example (see evidence).
- Protecting space for shared use facilities and consolidation of loads in strategic development areas (Opportunity Areas in London) (see evidence – case study).
- Requiring a transport assessment or statement to demonstrate how any loss of freight capacity is mitigated through provision of alternative facilities.

Evidence, specific examples, links:

- [Delivery and Servicing Plans and Construction Logistics Plans](#)
- Case study: [Freight consolidation study in the Isle of Dogs Opportunity Area](#)
- Studies such as this offer an opportunity to centralise freight planning at the local level rather than leaving operations open to inefficient competition which can lead to additional trips to deliver the same level of service to an area. Greater

recognition of the merits of planning for and controlling freight is needed among both the sector and planners/occupants of new developments.

Question 7

How effective is the planning system at addressing the operational needs of the freight and logistics sector and how could this be improved? How could a national freight network be recognised in national planning policy?

TfL/GLA response

This could be improved by:

- The NPPF providing formal recognition to the National Freight Network as something to take account of and to use in the local plan evidence base. There is currently a lack of accessible data sources on where available land for freight is, the most important existing sites that should be protected, potential future sites that could be allocated for sustainable freight use and land that could be redeveloped without having an impact on important freight networks. Collating and regularly updating this information in a single source, taking account of the impact of future trends and technology in the freight sector could be a useful function for a National Freight Network.

Question 8

How can the planning system support our net zero ambition for freight and logistics?

TfL/GLA response

Background context:

- Need to ensure that freight and logistics infrastructure is close enough to markets it serves to make use of low and zero carbon transport modes.

This could be improved by:

- Analysis of the impacts of different forms and scales of freight transport and research into the measures that could be adopted to reduce those impacts and work towards net zero. The planning system through site allocations and appropriate policies should provide support for the development and expansion of net zero carbon freight transport including cargo bikes as well as electric/hydrogen vans and lorries while also seeking to ensure that the future of freight operations is right sized rather than seeking continuous expansion.
- Sites that could support more sustainable freight movement could be specifically allocated for that use e.g. rail sidings with capacity to develop into rail freight sites, wharves or piers to maximise their use for freight, provision to consolidate vehicle loads or in central areas micro consolidation to enable last mile deliveries and collection by cargo bike or on foot.
- Existing freight sites that are redeveloped or potential new freight sites could be required through transport assessments to demonstrate how net zero carbon targets will be achieved. Dissemination of best practice and support for pilot

projects and monitoring will help to bring down the costs of compliance and incentivise freight operators.

- The London Plan requires all operational parking and servicing areas to be provided with live (as opposed to passive) charging infrastructure. This requirement could be extended beyond London, and national policies on electric vehicles charging could require provision for electric vans and in future alternative fuels for HGVs. It is noted that the electricity needs of the charging infrastructure for electric vehicle fleets of freight operators has to be planned for.
- Currently paragraph 109 of the NPPF addresses lorry parking, but it could go further in requiring sites to cater for the specific needs of future zero emission technology for these vehicles. This includes charging facilities, dimensions of the charging bay, whether there is enough space for largest vehicles to enter and leave the space to charge, the side of the vehicle that receives the charge as well as safety measures (lighting, security cameras, fire safety). The latter is a particular concern in terms of accommodating electric vehicles within developments and mean that additional space is needed.

Question 9

What more could local plans and decisions do to facilitate the supply of high-quality HGV parking and driver facilities?

TfL/GLA response

- There could be more consideration of HGV parking provision in urban areas and on the urban boundary, utilising under-used car parks and vacant areas of hardstanding near to main roads for example, but would need to be careful that this does not encourage development of new sites near to residential streets or sensitive land uses. This could involve sharing of sites with alternative daytime uses in locations which are served by the strategic road network to provide overnight lorry parking. It could also involve conversion of surplus car parking to provide an element of HGV parking and drivers' facilities such as high-quality bathroom, shower and changing spaces.

Question 10

How can planning policy in England help to support the freight and logistics sector across the whole of the UK?

TfL/GLA response

- Sufficient space for freight and logistics should be provided through local plans and site allocations, including the retention of existing industrial sites.
- In built up areas schemes over a certain size should include space for urban logistics.
- Also, the efficient distribution of deliveries in built up areas is often by cycle as it is faster and does not contribute as significantly to congestion as other vehicles. Government needs to consider the wider infrastructure needs to support this such as segregated cycle lanes and modal filters, i.e. the infrastructure on route rather than just at pick up and drop off.