

I welcome Policy E4 'Land for industry, logistics and services to support London's economic function' statement that provision should be made for 'land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure' and that 'The retention and provision of additional industrial capacity should be prioritised in locations that are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport'

I strongly recommend that planning policy should go further and recognise that land along the main rail routes into London is a precious commodity and that, where sites are, or can be, linked to the strategic road network for onward distribution, there should be a presumption in favour of transport and logistics use. By definition, modal transfer from low-carbon rail delivery to (electrically-powered) road vehicles for final delivery can only take place along the key rail arteries.

I believe that one of the most attractive, and easier, options for reducing emissions from logistics activity in London (consistent with Policy SI1) is to convey freight, both consumer goods and bulk materials, from source or distribution centre by electrically-hauled train to intermodal terminals on the edge of the city (e.g. Willesden or Cricklewood), from where it could be delivered by electrically powered lorries to final destination. The limited operating range of electric lorries is less of a constraint with such short distance "final mile" deliveries and this model would avoid the cost and time penalties associated with consolidation centres. The reverse logistics of roll cages, packaging materials and recycling/waste can use the same intermodal terminals, containers and trains on the return leg (consistent with Policy SI8).

I recommend that a criteria-based evaluation should be undertaken to identify sites to be earmarked for these crucial modal transfer activities and that there should then be a presumption in favour of such development at these sites. The principal criteria should be that a rail connection to the site could be provided and that it is, or could be, connected to the urban road network for the final leg of the delivery.

In many cases the air space above an intermodal terminal can be used for other purposes and thus the footprint need not be 'sterilised' - this has been demonstrated by a recently-commissioned modal transfer facility in Paris, and is fully consistent with the Intensification proposal in Policy E7. Within London, the air space above a rail-fed concrete plant at Westbourne Park is largely occupied by a TfL bus garage and there is considerable scope to create further such applications along the main rail corridors into London.

In line with my comments on Policy E4, colleagues in the rail freight industry have carried out a 'first pass' analysis using the suggested criteria, and have identified a number of new locations for rail-road modal transfer activity- note these are additional to sites that are already in use for intermodal transfer. The new sites proposed for inclusion in Table 6.3 and Figure 6.2 are:

1. Southall linked to the A3005
2. Old Oak Common/Wormwood Scrubs linking to the A219
3. Greenford linked to the A4127
4. Park Royal

5. Willesden Junction, linked to the A406/B4492/A4000
6. Neasden, linked to the A406/B4557
7. Cricklewood, linked to the A5/A406
8. Hornsey/Wood Green, linked to the A504/B138/A1080
9. Edmonton, linked to A406
10. Lea Valley, Leyton to Waltham Abbey, using A1055/A110/A406/A503/A104/A106
11. Bow/Stratford, linked to A102
12. Dagenham, linked to A13
13. Charlton, linked to A206/A102
14. Hither Green, linked to A205/A2212
15. Deptford, linked to B207
16. Selhurst/Norwood, linked to A213
17. Clapham North/Nine Elms, linked to A3036/B224/A3216/A3205
18. Tolworth, linked to A240/A3
19. Feltham, linked to A312/A314
20. Wandsworth, linked to A3209/A3205
21. South Acton/Gunnersbury, linked to A406/A315

This list is not intended to be exhaustive, but to give an indication of the locations that should be identified for modal interchange and accorded a presumption in favour of such use. They range in size, capability and distance from central London but, by linking rail and electric road vehicles, could each perform a crucial role in decarbonising and reducing emissions from freight and logistics across London.'

Yours sincerely,

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