

## LONDON INDUSTRY AND LOGISTICS SOUNDING BOARD

### WRITTEN STATEMENT FOR M63 – FREIGHT, DELIVERIES AND SERVICING

#### Introduction

These representations are submitted on behalf of the London Industry and Logistics Sounding Board (ILSB) and represent the collective thoughts and views of key representatives of the industrial and logistics sector, including operators, developers, occupiers, London Boroughs, research groups and statutory bodies.

When considering the response to industrial and logistics matters within the Draft London Plan, it is of paramount importance to recognise the structural shifts that have occurred within the urban logistics sector in recent years, particularly the rise of e-commerce and the ever-increasing demand for last-mile deliveries to service the growing population across London.

This statement sets out the ILSB's response to M63 and the questions raised by the Inspectors.

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***M63. 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?***

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- I) We support the overarching principle of a strategic policy which ensures an efficient and sustainable freight network to support the commercial functioning of London. However, Policy T7 is considered to be far more detailed than is appropriate, and proposes a level of prescriptiveness which goes beyond the scope of a Spatial Development Strategy. Accordingly, Policy T7 is considered to fail the test set out in the Greater London Authority Act 1999 paragraph 334 (5), which states, “*The spatial development strategy must deal only with matters which are of strategic importance to Greater London*”.
  - II) By way of example, the revised wording of the draft plan now references the Fleet Operator Recognition Scheme (FORS). Much of the requirements of FORS will be overtaken by the Direct Vision Standard and Safety Permit Scheme which becomes a requirement for all HGVs over 12 tonnes from October 2020. The London Plan should deal with matters of strategic importance and not seek to provide prescriptive measures which are more appropriately dealt with through supplementary guidance or Local Plans.
  - III) We consider that Policy T7 would be more effective if it focused on the strategic priorities for deliveries, servicing, and construction. It is the role of the Mayor's Transport Strategy to set specific targets in relation to these functions and is firmly the responsibility of the Mayor and Transport for London (TfL) to progress such matters through detailed guidance, for example through such means as the emerging TfL Freight Action Plan, rather than overly prescriptive planning policy in the Mayor's Spatial Development Strategy.
  - IV) Instead of concentrating on these more detailed matters, we strongly believe that the London Plan should ensure that the objectives of Policy T7 are aligned and cross referenced with the policy approach set out by Policies E4-E7, which sets out the planning strategy for managing the supply

and location of land and premises for industrial and logistics uses. The location and supply of logistics space is highly relevant to improving the efficiency and integration of freight, deliveries and servicing in London. For instance, as a general principle, the closer last mile hubs are to consumers, the more efficiently goods can be distributed at this stage of the supply chain. Not only can this spatial proximity generate benefits in terms of minimising the number and/or distance of freight trips required to distribute goods, it also allows more sustainable modes of transport to be considered which rely on short distance journeys – e.g. cycles and electric vehicles. Achieving these efficiency and sustainability benefits will not be possible without ensuring there is sufficient land supply for logistics facilities in the right locations, which will be managed under the policy approach set out by E4-E7.