

Katie Scuoler Senior Associate

katie.scuoler@dentons.com D +44 20 7246 7386 M +44 7825 715685 Dentons UK and Middle East LLP One Fleet Place London EC4M 7WS United Kingdom DX 242

dentons.com

BY POST AND EMAIL

EiP Secretariat GLA (Post Point 18) City Hall The Queen's Walk London SE1 2AA

FAO: Carmel Edwards

Our ref: KJES/RYP/019793.09053

5 April 2019

Dear Carmel

Draft London Plan – Matter 63 Freight, deliveries and servicing Respondent number 2156: Sainsbury's Supermarkets Ltd

We act for Sainsbury's Supermarkets Ltd.

The GLA acknowledged during the Matter 63 hearing session on Tuesday 19 March that amendments would be required to draft Policy T7.

In order to assist the examination process, we enclose suggested amendments to PolicyT7 (shown highlighted in yellow and underlined) which are intended to reflect the modifications raised in the session by various parties, including the GLA.

We would be grateful if you could share a copy of the enclosed attached with the GLA and the Examiners.

Yours sincerely

Katie Scuoler Senior Associate

Dentons UK and Middle East LLP

Policy T7 Freight and Deliveries, servicing and construction

- A Development Plans, Opportunity Area Planning Frameworks, Area Action Plans and other area-based plans should include freight and servicing strategies.

 These should seek to:
 - 1) reduce freight trips to, from and within these areas
 - coordinate the provision of infrastructure and facilities to manage freight and servicing at an area-wide level
 - seek to reduce noise and emissions from freight, such as through sustainable last-mile schemes and the provision of rapid electric vehicle charging points for freight vehicles.

Such strategies should be developed through policy or through the formulation of a masterplan for a planning application.

- B To support carbon-free travel from 2050, the provision of hydrogen refuelling stations and rapid electric vehicle charging points at logistics and industrial locations is supported.
- Wharves and railheads involved in the distribution of aggregates should be safeguarded in line with Policy SI9 Safeguarded waste sites, Policy SI10 Aggregates and Policy SI5 Water infrastructure. Development Plans should safeguard railheads unless it can be demonstrated that a railhead is no longer viable or capable of being made viable for rail-based freight-handling. The factors to consider in assessing the viability of a railhead include:
 - Planning history, environmental impact and its relationship to surrounding land use context – recognising that the agent of change principle will apply
 - Location, proximity to the strategic road network and existing/potential markets
 - Existing and potential contribution the railhead can make towards catering for freight movements by non-road modes
 - The location and availability of capacity at alternate railheads, in light of current and projected capacity and market demands.
- D Consolidation and distribution sites at all scales should be designed to enable 24-hour operation to encourage and support out-of-peak deliveries where appropriate having regard to the locality and nature of the operations.
- Development proposals for new consolidation and distribution facilities should be supported. Proposals should seek wherever feasible to provided that they:
 - 1) deliver mode shift from road to rail or water without adversely impacting passenger services (existing or planned) and without generating significant increases in street-based movements;
 - 2) reduce traffic volumes within London;
 - 3) reduce noise and emissions from freight and servicing trips; and/or

- 4) enable sustainable last-mile movements, including by cycle and electric vehicle.
- Povelopment proposals should facilitate sustainable freight deliveries and servicing, and should ensure appropriate arrangements for including through the provision of adequate space for servicing, storage and deliveries off-street. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.
- G Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night time <a href="https://www.where.org/where.org
- H At large developments, facilities to enable micro-consolidation should be provided, with management arrangements set out in Delivery and Servicing Plans.
- Development proposals must consider the use of rail/water for the transportation of material and adopt appropriate construction site design standards to that enable the use of safer, lower trucks with increased levels of direct vision on waste and landfill sites, tip sites, transfer stations and construction sites.
- IA The construction phase of development should prioritise and maintain inclusive, safe access for people walking or cycling at all times