

Written Statement for the London Plan Examination in Public – Matter 63

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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?

1. INTRODUCTION

1.1. Yes, Policies T7 and E4-E7 provide an effective strategic framework for ensuring suitable sites and infrastructure for sustainable deliveries, servicing and construction across London. In particular, Policy T7 is necessary to ensure freight movements are co-ordinated and planned for, and that activities relating to freight become safer, cleaner and more efficient¹ as London grows.

2. THE ROLE OF FREIGHT IN A GROWING LONDON

2.1. Sustainable freight movements are essential to London's economy and Londoners' day-to-day lives. As London grows to 10.8m by 2041, it will become increasingly important to ensure that freight activities are carried out as safely, cleanly and efficiently as possible, while continuing to support a well functioning city. Over the last 25 years, the distance travelled by freight vehicles in London has increased by approximately 39 per cent, compared to population growth of 28 per cent.² This underlines some of the challenges that might arise due to population growth without a suitable policy framework in place, even before changing consumer preferences and business practices are taken into account.

2.2. The Mayor's Transport Strategy (MTS) sets out TfL's overall approach to freight in this context. In particular, the MTS promotes a reduction in distance travelled by freight trips and sets a target to reduce the volume of lorries and vans entering central London by 10 per cent by 2026. In the coming months we will be publishing a Freight and Servicing Action Plan, which will provide more detail on the measures that can be taken to realise the vision contained in the MTS. This approach aims to:

- ensure that freight and servicing needs are considered at an early stage in development proposals to reduce the number of vehicles required, improve the efficiency of last mile deliveries and shape design to minimise conflicts with people walking or cycling. We will provide guidance on retiming trips, quieter deliveries and

¹ Efficiency is used in this statement to refer to carrying out the same function (e.g. delivering the same volume of goods) using fewer vehicle kilometres, particularly during peak congestion hours. This could be achieved for instance by reducing missed deliveries, retiming deliveries or consolidating goods into fewer, fuller vehicles.

² Department for Transport annual vehicle kilometres (1993-2017) and GLA London Datastore population growth.

other similar measures, which will help embed good freight practices in scheme design;

- secure lower emissions by reducing the number of deliveries through co-ordinated area action plans, provision for electric and other ultra-low emission vehicles, use of cycle and pedestrian freight, and compliance with the Ultra Low Emission Zone;
- take opportunities to shift freight from road to London's river, canal and rail networks, including by delivering consolidation facilities near wharves and railheads;
- support London's 24-hour economy and move freight away from the most congested routes and times by following examples in Europe of off-peak deliveries (enabled through appropriate noise and other mitigation);
- carefully manage and plan for the freight activities generated by new development (including provision of micro distribution), particularly in congested areas.

2.3. Policy T7 plays a vital role in supporting these initiatives and ensuring sustainable and reliable freight movements in London, as set out in the following two sections.

3. SAFE, CLEAN AND EFFICIENT FREIGHT

3.1 The last decade has seen the volume of van traffic in London increase considerably³ and we expect London-wide levels to continue to grow. This has increased pressure on space for deliveries and servicing, particularly at the kerbside. It is therefore important for development proposals to incorporate the space, facilities and access required for deliveries and servicing to be carried out, including on-site/off-highway where appropriate. Policy T7 requires adequate provision at each site, supported by a Delivery and Servicing Plan (DSP) and assessed on a case-by-case basis. Beyond this, Policy T7 also ensures that the freight movements generated by new development are sustainable and, in particular, have a reduced impact on congestion, emissions and road danger as London grows.

3.2 The growth in van traffic also places heightened importance on ensuring that deliveries and servicing are carried out as efficiently as possible, including moving more activity outside of peak traffic hours. Policy T7 supports more efficient freight movements associated with new development through reduced overall vehicle kilometres. It does this by:

- requiring co-ordination of freight infrastructure and facilities in area-based plans;
- supporting freight by rail and water (including through the safeguarding of railheads);
- supporting new consolidation and distribution facilities where they can reduce traffic volumes, noise and emissions from freight;
- enabling off-peak deliveries and reducing repeat trips from missed deliveries.

³ Figure 7.8, Travel in London Report 11

- 3.3 Across Greater London, road transport is responsible for half of the main air pollutants⁴, including nitrogen oxides and particulate matter. Policy T7 will support reduced air pollutants from freight, such as through facilitating zero-emission last mile solutions and electric vehicle charging. This will also enable lower greenhouse gas emissions and support London's transition to Zero Carbon by 2050.
- 3.4 Freight vehicles, particularly Heavy Goods Vehicles (HGVs), disproportionately contribute to road danger for vulnerable road users. HGVs generally make up less than five per cent⁵ of vehicle kilometres in London, but between 2015 and 2017, HGVs were involved in 23 per cent of pedestrian and 63 per cent of cyclist fatalities.⁶ Policy T7 supports reduced road danger from freight vehicles, including through the use of safer trucks with higher levels of driver vision, and the requirement for Construction and Logistics Plans (CLPs) which identify opportunities to reduce the impact of construction vehicles, including the risk of casualties. DSPs and site design can also minimise potential conflicts between freight vehicles and people walking or cycling once the development is operational.
- 3.5 This approach is complemented by policies E4-E7 of the Plan. These policies support making freight more efficient by ensuring sufficient sites to enable freight trips to serve destinations within London without travelling significant distances. They also support intensified use of land which can help accommodate increased demand as the city grows in the context of a limited supply of land for all uses. Industrial sites in a variety of locations across all boroughs can also encourage more trips to be made by sustainable modes and/or over shorter distances. Industrial land is key element of freight's role in making London a function as a city, and the Plan provides a robust strategic framework for ensuring this. However, the impacts of associated vehicle movements on road danger, emissions and congestion are significant enough to also require Policy T7 to design facilities that can manage demand on the road network and adequately mitigate impacts.

4. ADDRESSING STRATEGIC PRIORITIES AND THE ROLE OF LOCAL PLANS

- 4.1. We believe that all parts of Policy T7 are justified and necessary to address the strategic priorities of London. The policy plays an important role in reducing road danger, emissions and congestion in support of the Good Growth policies, especially creating a healthy city (GG3) and growing a good economy (GG5). London's road, rail and water networks cross administrative boundaries and the number and type of delivery or servicing trips serving a development can have considerable impact on areas in adjacent boroughs, both in terms of the economic activity it generates and the road danger, noise, emissions and congestion generated by moving freight vehicles. A consistent, strategic approach defined in the London Plan is therefore required. This is particularly important given the role of freight in a functioning city, and its social, economic and environmental costs, which are felt more widely than any one borough. Operators also work across borough boundaries and benefit from a level of consistency across different areas of London.
- 4.2. Through setting out strategic requirements in the London Plan, Policy T7 can ensure freight across London becomes safer, cleaner and more efficient. However, planning at

⁴ Healthy Streets for London, page 23

⁵ Vision Zero Action Plan, TfL 2018

⁶ Stats-19, Department for Transport, 2017

a more local level also plays a vital role. As such, Policy T7 requires planning to take a proactive approach to freight through Development Plans, Opportunity Area Planning Frameworks, Area Action Plans and other area-based plans. These can set out how freight provision can be best delivered given the strategic aims of the policy and local circumstances. This approach allows these strategic outcomes to be achieved flexibly as the industry and consumer preferences change over time to reflect changing circumstances.

- 4.3. Furthermore, there are a number of aspects of freight provision which must be considered at a detailed level, either on a site-by-site basis or across a local area if provision is being co-ordinated. The Plan does not preclude this from taking place, nor Development Plans providing further direction on how more sustainable freight and sufficient sites and infrastructure should be secured.

5 CONCLUSION

- 5.1 The draft Plan provides a robust and necessary strategic framework for freight in London that ensures sufficient facilities and clear requirements for reducing the impact on road danger, emissions and congestion. We consider all parts of the policy to be necessary to address strategic priorities for London, while allowing for significant and appropriate flexibility at the local level for how this is achieved.