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Association of International Courier & Express Services

AICES Response to the Draft New London Plan

Introduction

The Association of International Courier and Express Services (AICES) welcomes this opportunity to respond to the Mayor of London's Draft New London Plan.

AICES is the UK trade organisation for companies handling international express documents and package shipments. Our members provide door-to-door transport and deliveries of tracked next-day or time-definite shipments, including documents, parcels and merchandise goods. A recent study by Oxford Economics, found that in 2010, the express sector contributed £2.3 billion to UK GDP, and the sector facilitated £11 billion of UK exports a year. More than two-thirds of businesses reported that express services were vital or very important to their business overall and over 80% of UK businesses surveyed state that their businesses would be badly affected if international next-day delivery services were no longer available. London, in particular, relies heavily on express services because of the international nature of the business conducted in the Capital.

AICES welcomes the acknowledgement in the draft New London Plan consultation of the importance of considering the impact of policies on the efficiency of freight traffic which keeps London's businesses functioning. As stated in paragraph 10.7.1 "An efficient freight network is necessary to support the function of the city".

In order to meet the demands of London businesses for reliable and efficient express services, AICES members need a road network which enables predictable journey times and access to deliver and collect to meet time-sensitive deliveries. Congestion levels in London are a key concern since speed and reliability are absolutely crucial if London is to remain competitive in the international market place. AICES has the following specific points to relevant Policies set out in the consultation.

T7 – Freight and Servicing

AICES Members support the Mayor's objectives to reduce emissions in London and improve air quality. AICES strongly supports the proposal to improve the charging infrastructure both for electric and hydrogen fuel cell vehicles.

Our members take their environmental responsibilities seriously and programmes are in place to reduce carbon footprint and the environmental impact caused by express operations. Across the industry, express services make continual improvements to fuel efficiency and operate the minimum number of vehicles in London needed to deliver an effective service to customers through efficient network planning and consolidation at hub operations. A number of our Members already operate electric vehicles and hybrid vehicles and stop start engine technology, as well as innovative fuel alternatives such as LNG.

AICES believes that there should be regulatory incentives for those adhering to industry agreed standards for cleaner, quieter and safer deliveries in London. This approach would ensure that both vehicle specification and training are taken into consideration as well as other policy priorities for example around air quality. For example, compliant vehicles could be rewarded with: use of bus lanes; exemption or reduced rate for the Congestion Charge; exemptions from London Lorry Control Scheme routing requirements for out of hours delivery; grounds for reviewing loading and unloading restrictions and abatement orders depending on the nature of the delivery and vehicle.

Express services operations are crucial to London businesses and our delivery and collection times have to coincide with the business working day. Any specific restrictions on delivery vehicles in London during peak times would have an enormous impact on the express industry and London as a whole. Deliveries cannot easily be retimed outside of peak hours owing to local restrictions put in place and managed by the 33 different boroughs. Localised restrictions on delivery vehicles during peak hours would further constrain the window in which deliveries can be made. Specific restrictions on HGVs would also have a negative environmental impact since an HGV vehicle carries roughly 8 times the material of a van. The Express sector uses HGVs to transport goods arriving by air from growth markets early in the morning to a service centre in the city before distribution by courier vans to customers for example in the financial services, pharmaceutical, and engineering sectors before 9am.

Restrictions on delivery vehicles can also damage the business case for investing in alternative fuel vehicles. Vehicles which run on gas or electricity are significantly more expensive to purchase, and this investment is only worthwhile if the vehicles can be used on multiple shifts throughout the day. Removing the ability to use them in peak hours would therefore make it harder for operators “go green”.

Consolidation centres for certain types of deliveries can play a role in reducing traffic movements. However, with express services, the main integrators offer a door to door service, where customers can track their package throughout from collection to delivery and already have their own hub ‘consolidation’ centres. The nature of express services means a van needs to go into the City to collect packages so will also normally enter laden with deliveries. It would not be efficient to drop off deliveries at a hub and go into the centre of London empty. For express services, therefore, outer-City consolidation centres would not be an option that could be considered, although such centres could be considered by other sections of the logistics industry.

AICES members would welcome a review of night time delivery restrictions to examine extended hours for delivery and collection. The Mayor also needs to review with London boroughs the provision of loading bays to ease delivery and collections and greater consideration should also be given to the impact on freight when cycling routes are introduced.

T8 – Aviation

AICES welcomes the Mayor of London’s recognition of the importance of international express operations and specifically the statement in paragraph 10.8.10 that:

“Air freight plays an important role in supporting industry in London and the UK, and the provision of both bellyhold and dedicated freighter capacity should be an important consideration when plans for airport development in the south east of England are taken forward.”

AICES believes that it is important for the draft New London Plan to acknowledge that the UK has to adapt to changing global connectivity needs if London is to compete internationally. Maintaining an international network of aviation connections is vital to the UK economy as a whole, but particularly to London given the global nature of the business conducted in the City. The Department for Transport's demand forecasts suggest that without action all of London's airports could reach capacity as early as 2025. AICES therefore supports the decision to expand aviation capacity in the South East in line with the recommendations of the Independent Airports Commission and welcomes the Mayor's acknowledgement of the need to improve runway capacity in the South East.

The connectivity that Heathrow provides express services is essential as it gives access to routes and countries that are not directly served by cargo aircraft. Capacity constraints at Heathrow that limit the frequency and diversity of destinations served can impact on express services' ability to move material around the world as quickly and efficiently as customers require. Heathrow is important for express services both in terms of cargo flights and most particularly, bellyhold. The small number of flights that arrive into Heathrow in the early morning are long haul commercial passenger aircraft coming from strategically important international markets in the Far East, Asia and Africa. Express services have freight on all these movements which gets cleared and delivered into the UK same day of arrival. The bellyhold on these early morning flights offers a valuable addition to freight only flights, providing flexibility and efficiency which is particularly beneficial to London's businesses operating in the international market place.

AICES supports the Mayor of London's objective to ensure that surface access around Heathrow is sustainable with a focus on improving air quality and reducing emissions and congestion. Improvements to surface access around the airport would be beneficial to logistics operations irrespective of the construction of a third runway given current congestion. AICES would suggest that any measures proposed around Heathrow Airport should be in line with the ULEZ standards (Euro VI) that are scheduled to come into force in London and in line with the Government's Clean Air framework. A different standard applying around the airport would cause fragmentation for freight operators who could potentially have to comply with different vehicle specifications along the same route.

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