



DB Cargo (UK) Limited
Ground Floor McBeath House
310 Goswell Road
London EC1V 7LW

Richard Clarke
Head of Transport Policy, Access &
Regulation



2 March 2018

Dear Sir / Madam,

DB Cargo UK Ltd Comments on draft New London Plan

1. This letter contains the response by DB Cargo (UK) Limited (“DB Cargo”) to the consultation on the draft New London Plan. DB Cargo confirms that it is content for this response to be published.
2. DB Cargo is the largest rail freight operator in the UK and is a wholly owned subsidiary of Deutsche Bahn, the second largest mobility and logistics group in the world. DB Cargo operates over 5,000 trains per month in the UK conveying everything from cereals to aggregates, consumer products to biomass and petroleum to steel. DB Cargo employs over 2,200 people, providing freight, infrastructure, rail support and charter passenger services within the UK and freight services to and from continental Europe via the Channel Tunnel.
3. DB Cargo in common with other rail freight operators is a wholly private sector activity receiving no material direct government support in the UK. In this respect, rail freight is different to passenger rail as it has a very different, less direct relationship with Governments, funders and other devolved bodies. In a heavily-capital intensive industry, DB Cargo owns and operates its own assets, including depots and rolling stock, and has invested heavily in new locomotives, wagons and facilities over the years since UK privatisation.
4. As the UK’s largest rail freight operator, and given the importance of rail freight to supporting the sustainable growth to London, DB Cargo UK Ltd believe it is important that they are involved in the Examination of the draft New London Plan.



2/15

Yours sincerely,



Head of Transport Policy, Access & Regulation

...



DB Cargo UK Consultation Response to Draft London Plan

DB Cargo UK Ltd (DB Cargo) welcomes the opportunity to comment on the Draft New London Plan (the Plan) and would be keen to contribute further in relation to development of rail freight policy, including participation at the Examination. As the UK's largest freight operator, and owner of a number of strategic rail freight assets in London, it is essential that DB Cargo are involved in the Examination process.

DB Cargo is the largest rail freight operator in the UK and is a wholly owned subsidiary of Deutsche Bahn, the second largest mobility and logistics group in the world. DB Cargo operates on average 5,000 trains per month in the UK conveying everything from cereals to aggregates, consumer products to biomass and petroleum to steel. DB Cargo employs over 2,200 people, providing freight, infrastructure, rail support and charter passenger services within the UK and freight services to and from continental Europe via the Channel Tunnel. DB Cargo also provides a range of logistics, supply chain and associated services, including warehousing and terminal management.

DB Cargo owns and operates a significant number of strategic rail freight assets at various locations throughout the city as set out in **Appendix 1**.

This includes the Eurohub facility at Barking which provides access to European and worldwide markets via the HS1 rail link and the excellent connections to the wider UK rail Network. There is also significant potential for residential development in the vicinity of Eurohub, including enabling the more efficient configuration of rail freight facilities. The proximity of this residential development with the rail freight facilities would facilitate the highly sustainable transportation of construction materials to the development site. This site also has significant potential as a major hub for London for inward trans-shipment of aggregates and construction material, and for the necessary recycling, processing and onward transportation of construction waste. This will be strategically important in supporting the ambitious growth and regeneration strategy for London set out in the Plan.

DB Cargo are also promoter of the proposed aggregates and construction facility at Cricklewood to support building at scale as part of the Brent Cross Cricklewood Opportunity Area.

The Economic and Environmental Benefits of Rail Freight

The efficient movement of freight is critical to London's economy and London is particularly reliant on the movement of goods by rail. The rail freight industry has an essential role in supporting the construction industry (40%¹ of aggregates are currently brought in by rail), supplying businesses and customers, and enabling the movement of waste. Construction in London would not be able to take place effectively without supply

¹ Minerals products Association and Rail Freight Group, Why is Rail Freight vital for Housing and Construction? (2016)



chains for key materials and mineral products². Due to significant development pressure across the city, wharves and rail depots are under threat, and once lost, will not be replaced. The loss of these strategic assets will have implications for mineral supply and distribution, and the economy for London as a whole. It would also jeopardize the ability to supply London construction markets in the most sustainable manner³.

The London Plan sets the policy framework for ambitious levels of growth in the form of new homes and jobs, requiring significant investment in supporting infrastructure. These levels of development and growth will place additional demands for movement of goods and materials.

The Plan is underpinned by the concept of 'Good Growth'. It acknowledges the challenges in delivering the anticipated levels of growth in a way which is environmentally sustainable, but also sets ambitious targets for London as a zero-carbon city by 2050, as well as objectives for London to be a healthier city with less congested and polluted streets. The environmental benefits of rail freight are clear and compelling. Reducing HGV movements has clear benefits in reducing road congestion, improving road safety and improving air quality.

40 per cent⁴ of aggregates in London are now moved by rail, and demand for more rail freight services and facilities is growing. The latest data available shows that in Q3 of 2017-18 UK construction related rail freight recorded its highest Q3 on record with 1.1 billion net tonne kilometres this quarter, an increase on 2016-17 Q3⁵. The Mineral Products Association estimate that each rail freight train carrying construction material into London can carry enough material to build the equivalent of 30 homes and remove 75 HGVs from London's road network.

As rail freight produces 76% less CO2 emissions than the equivalent HGV journey, increasing rail freight in London will contribute significantly to meeting London and UK carbon reduction targets⁶. More specifically, 50% of DB Cargo's fleet benefits from Stop-Start Technology, which has a number of positive impacts on air quality improvement, noise reduction and community amenity. In turn, the fleet is particularly well-placed to transport aggregates into London city. The rail freight industry therefore has an important role to play in supporting London's economy, delivering sustainable growth and supporting the Mayor's objectives for London.

In particular, the Plan's strategy for growth and regeneration of London will require the sustainable transportation and processing of construction materials and waste. In

² Mineral Products Association – Safeguarding London's Wharves and Rail Depots for future prosperity and sustainability

³ Mineral Products Association – Safeguarding London's Wharves and Rail Depots for future prosperity and sustainability

⁴ Minerals products Association and Rail Freight Group, Why is Rail Freight vital for Housing and Construction? (2016)

⁵ Freight Rail Usage, 2017-18 Q3 Statistical Release, ORR / National Statistics, 1 March 2018

⁶ Minerals products Association and Rail Freight Group, Why is Rail Freight vital for Housing and Construction? (2016)



particular there is a need for a suitable network of rail-freight facilities, and co-located facilities for processing, recycling and storage of aggregates and construction waste.

The Policy Framework for Rail Freight

As the strategic spatial plan for London, the London Plan has a key role in supporting the rail freight sector and setting the policy framework to support development and address some of the challenges faced by the sector. The key principles are highlighted below and specific suggested changes to policy are outlined in the table below. It should also be acknowledged that alongside planning policy, there are parallel environmental and permitting frameworks in place, such as the Environmental Agency regulations. In relation to rail freight, it is therefore of crucial importance that proportionate planning conditions should be considered within this wider context.

If rail freight is to prosper, it is essential that there is a sufficient supply of rail linked sites and facilities, and a network of terminals and strategic interchanges and which can operate flexibly. This needs to include the capability to undertake viably the handling, storage and processing of aggregates and construction materials and waste. This is important to avoid double-handling, extra journeys, and extra sensitive lorry miles, in line with the wider sustainability objectives of the Plan.

A large number of DB Cargo rail freight assets are located in Opportunity Areas and Strategic Areas for Regeneration. Whilst this development activity constitutes an opportunity, it also brings challenges in safeguarding sites. There is a need to enable future investment in, and operation of, rail-freight sites and co-located facilities for the processing, recycling and storage of aggregates and construction waste. The London Plan needs to give clear guidance to boroughs on how to manage adjacent developments and ensure that rail freight facilities and co-located processing, recycling and storage facilities are not subject to disproportionate planning requirements which compromise their viability.

The Minerals Product Association states that “in spite of strong national and local planning policies safeguarding wharves and rail depots, these policies are not always implemented effectively. This can lead to incompatible development close to wharf and rail locations which can put pressure on and limit the operation of these facilities. Proposed new housing development adjacent to wharves and rail depots, if poorly designed, can generate complaints from residents about noise and site activities. This can in turn lead to constraints on the use of the wharves and rail depots. In some cases planning authorities and developers wish to end site safeguarding and build on wharf or rail depot sites. Wharves and rail depots can generate noise and dust and include areas for material storage and processing. They sometimes need to operate for 24 hours. If wharf and rail depots sites are lost, either through design or ignorance, we will lose our ability to supply London construction markets in the most sustainable manner forever⁷.”

⁷ Mineral Products in London, Safeguarding London's Wharves and Rail Depots for Future Prosperity and Sustainability, Minerals Products Association, p. 5



Rail connected land sites are also being lost for housing and other non-rail uses. If this takes place in an un-planned way, this will restrict the rail freight industry's ability to operate efficiently, and once lost, it is extremely unlikely that such land could be brought back into rail freight use. However, there is also a need for some flexibility to enable existing sites to be reconfigured, potentially on smaller footprints, as rail freight markets and operations change.

The London Plan has a very strong policy framework for protecting riparian wharves and promoting the use of waterways for freight transport. DB Cargo consider that the Plan should also give specific policy support for the safeguarding of rail freight facilities, and protecting existing and possible future rail linked sites including from inappropriate adjacent development. This should provide some flexibility, recognising that rail freight markets change, and it is possible to configure rail-freight facilities more efficiently as technological and operational advances.

The absence of suitable rail linked warehousing in London means that opportunities to use rail services more extensively to deliver goods to the city cannot be developed as expected. The London Plan should also support the development of strategic rail freight interchanges, and necessary co-located processing, recycling and storage facilities. This is a strategic issue and one which we would expect the London Plan to address. The table below sets out suggested amendments to policies and supporting text in order to provide the supportive policy framework necessary to develop the rail freight industry to support the wider growth ambitions of the London Plan.

**Table 1: Comments and Suggested Policy amendments to the Plan**

Policy Ref	SD1 - Opportunity Areas
DB Cargo comment/suggested changes to Policy	<p>SD1 sets out policies to guide development in all Opportunity Areas. The policy states that Boroughs should set ambitious transport mode share targets for these areas.</p> <p>However, it is considered that the policy should also recognise the importance of maximising opportunities to support the transportation of construction materials, waste and other commodities by rail in these areas of significant development activity.</p> <p>DB Cargo also consider that there should be supporting text on specific Opportunity Areas highlighting where there are strategic rail freight assets that should be supported and enhanced, or where there is significant potential for new facilities. This should include enabling viable co-located processing, recycling and storage facilities.</p> <p>In particular this includes the Eurohub facility in Barking Riverside (London Riverside Opportunity Area). This considerable scope at this location for vertical integration with complementary industrial uses including processing and recycling of construction waste. This will lead to greater efficiencies and further reduction in HGV trips. The benefits this will bring in supporting the wider regeneration and scale of construction in this area should be highlighted in policy.</p> <p>In addition, as part of a significant Opportunity Area, there is considerable scope for residential intensification at Barking Riverside as freight markets change by facilitating reconfiguration of rail freight facilities onto more efficient footprints whilst maintaining a viable facility with equivalent volume and capacity. This allows efficient use of land and release for other uses (whilst maintaining a viable facility) in a prime development location.</p>



Policy Ref	SD2 - Collaboration in the Wider South East
DB Cargo comment/suggested changes to Policy	<p>DB Cargo supports the recognition in this policy of the need for a strategic approach to planning for freight and for the Mayor to work collaboratively with authorities in the wider SE on this issue.</p> <p>DB Cargo suggests that this policy should recognise the particular challenges associated with rail freight which need to be overcome- cross boundary benefits, longer term planning, requires more capital investment in infrastructure.</p> <p>Enabling the viable processing and recycling of construction waste at rail freight facilities in London is in line with the Plan objectives to increase recycling in London.</p>
Policy Ref	SD4 - The Central Activities Zone
DB Cargo comment/suggested changes to Policy	<p>DB Cargo supports the recognition in this policy that sufficient capacity for industry and logistics should be identified and protected, including last mile distribution, freight consolidation, processing and other related service functions within or close to the CAZ and Northern Isle of Dogs to support the needs of businesses and activities within these areas.</p> <p>DB Cargo consider that it should be made clear that consolidation centres should be rail served wherever possible.</p>



Policy Ref	E4 - Land for industry, logistics and services to support London's economic function
DB Cargo comment/suggested changes to Policy	<p>DB Cargo support recognition in Part A of this policy that a sufficient supply of land and premises should be maintained in different parts of London to meet current and future demands for industrial and related functions. There is also recognition that this should include storage and logistics/distribution and land for sustainable transport functions including intermodal freight interchanges with the capability to provide co-located processing, recycling and storage of construction material and waste. DB Cargo consider that the policy should also make reference to the benefits of vertical integration of co-located associated industrial activities.</p> <p>DB Cargo also strongly support recognition in Part D states that the retention and provision of additional industrial capacity should be prioritised in locations which have good access to the strategic road network and/or have potential for the transport of goods by rail and or water transport. The policy should also highlight potential for vertical integration with other processes such as waste processing and recycling and transport of construction waste and the efficiency and environmental benefits this brings.</p> <p>However, DB Cargo consider that this policy should be amended to give greater prominence to the need to secure supply of land and facilities specifically to support rail freight. It should also state that the retention and provision of industrial land with good access to rail and/or water should be given particularly high priority.</p>



Policy Ref	E7 - Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function
DB comment/suggested changes to Policy	<p>DB Cargo supports the fact that the policy seeks to ensure that the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements, and days/hours of operation.</p> <p>However, DB Cargo consider that the policy does not go far enough in protecting rail freight facilities; these should be mentioned specifically to ensure that residential/mixed use development in these areas does not undermine the viability of facilities and necessary co-located activities. The policy should have clearer guidance on the value of rail freight facilities and how to manage potentially sensitive uses in the proximity of rail freight facilities (e.g. the need to avoid onerous planning conditions which undermine the viability of facilities).</p> <p>The policy gives a lot of discretion to Boroughs to decide how/where currently protect industrial land will be released for residential development. The London Plan give therefore give a clearer steer about the strategic importance of rail freight facilities and the need to protect them.</p> <p>The policy should also highlight the benefits of co-location of processing, storage and recycling to achieve more efficient vertical integration of processes.</p>
Policy Ref	SI15 - Water Transport
DB Cargo comment/suggested changes to Policy	<p>The Policy states that development proposals to facilitate an increase in the amount of freight transported by river should be supported.</p> <p>DB Cargo consider that water transport is recognised as one of the most sustainable modes for freight but the Plan does not give specific support for rail freight. A specific policy for support and development of rail freight and associated operations should be formulated.</p>



Policy Ref	T1 - Strategic approach to transport
DB Cargo comment/suggested changes to Policy	<p>Supporting text to T1 (10.1.3) states that the Mayor will work with partners to minimise servicing and delivery trips on the road network including through freight consolidation. It also states that the Mayor will promote efficient and sustainable essential freight functions, including by road, rail, water and, for shorter distances, bicycle.</p> <p>Given the need to plan the rail freight network strategically DB Cargo consider that Policy itself should make specific reference to rail freight, and the important role of co-located facilities for processing, recycling and storage of construction material and waste, rather than this being referenced in supporting text.</p>
Policy Ref	T2 - Healthy Streets
DB Cargo comment/suggested changes to Policy	<p>DB Cargo supports the principle of Healthy Streets and the reference to the need to plan for <i>sensitively designed freight facilities to support this</i>.</p> <p>Para 10.2.3 also acknowledges that the Healthy Streets Approach <i>requires better management of freight</i> so the impact of moving goods and delivering services on London's streets is lessened.</p> <p>DB Cargo also welcomes the statement that the Mayor will work with the freight industry, its customers and London's boroughs to develop <i>more creative solutions to managing freight and deliveries</i>.</p> <p>DB Cargo consider that the policy and supporting text should give much more prominence to the role of rail freight, and maximising the operational efficiency of rail freight transfer activity, in reducing HGV trips (a single train can replace 75 HGV journeys) and improving air quality and safety and achieving the Mayor's objectives in relation to Healthy Streets. The opening section of this consultation response provides some key statistics in relation to the environmental benefits of rail freight which the supporting text should reflect. In general, the Plan does not say enough about the environmental benefits of rail freight and co-located facilities for processing, recycling and storage of construction materials and waste and it considered that the London Plan should have a clearer and more supportive position on this.</p>

...



Policy Ref	T7 - Freight and Servicing
	<p>DB Cargo support reference in Part A to requiring Opportunity Area Planning Frameworks, Area Action Plans and other area-based plans to include freight and servicing strategies. These should <i>coordinate the provision of infrastructure and facilities to manage freight and servicing at an area-wide level</i>. This should include co-located facilities for processing, recycling and storage of construction materials and waste. However, DB Cargo consider that the wording should be amended to be clearer that it is about increasing efficiency of the system in order to reduce trips.</p> <p>DB Cargo also strongly support reference in Part C to the need to safeguard wharves and railheads involved in the distribution of aggregates <i>in line with</i> Policy SI9 Safeguarded waste sites, Policy SI10 Aggregates and Policy SI5 Water infrastructure. The policy should also recognise the potential to combine processing and recycling of aggregates and waste and in doing so create a more efficient logistics system which reduces HGV movements on the roads.</p> <p>DB Cargo also support Part E which states that development proposals for new consolidation and distribution facilities should be supported provided subject to a range of criteria including that they should deliver mode shift <i>from road to rail or water</i>.</p> <p>However DB would question the reference to adversely impacting passenger services (existing or planned). There needs to be a balanced approach to the prioritisation of rail capacity that recognises the environmental and economic advantages of rail freight in the off-peak. The London Plan should also recognise there are often operational reasons (e.g. planned maintenance) why it is not feasible for rail freight to operate at night.</p> <p>DB Cargo also consider that this part of the policy should make reference to particularly strong support for proposals which integrate transportation, storage, processing and recycling of aggregates and waste and other related industrial activities.</p> <p>Part F should include more explicit reference to the role of rail freight in reducing the local impacts of construction activity by reducing lorry movements.</p>

...



	<p>DB Cargo support the reference in supporting text for the identification and protection of new sites for load consolidation at a range of scales in central, inner and outer London to aid sustainable last-mile consolidation. However, it should be made clear that sites with rail access will be favored.</p> <p>DB Cargo consider that safeguarding rail freight facilities should be covered by a separate dedicated policy which would give greater prominence to the importance of these facilities and need to retain them. DB Cargo would be pleased to assist in developing this policy with the London Plan team and through the Examination process.</p>
Policy Ref	S19 - Safeguarded waste sites
DB Cargo comment/suggested changes to Policy	<p>DB Cargo supports the statement that existing waste sites should be safeguarded and retained in waste management use and that the loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London that must at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost.</p> <p>DB Cargo consider that the policy should make particular reference to the value of waste and recycling sites with rail access and the need to protect these. There should also be more specific proposals on how conflicts with sensitive uses should be dealt with by Boroughs to avoid undermining the operation of sites and necessary co-located facilities.</p>



Policy Ref	SI8 - Waste capacity and net waste self sufficiency
DB Cargo suggested changes to Policy	<p>DB Cargo support the requirement for development proposals for new waste sites or to increase the capacity of existing sites to be evaluated against a range of criteria, including: the transport and environmental impacts of all vehicle movements related to the proposal. It also states <i>the use of rail and waterway networks to transport waste</i> should be supported.</p> <p>However, DB Cargo consider that the wording should be amended to make clear that proposals for waste sites with direct access to the rail network will be positively supported and prioritised. The wording should also support the provision of co-located facilities for processing, recycling and storage of construction materials and waste to avoid double-handling and unnecessary transportation.</p>
Policy Ref	SI10 – Aggregates
DB Cargo comment/suggested changes to Policy	<p>DB Cargo supports the requirement for an adequate supply of aggregates to support construction in London to be achieved, and the reference to importing aggregates to London by <i>sustainable transport modes</i>.</p> <p>DB Cargo also supports the requirement for all Mineral Planning Authorities in London to identify and safeguard aggregate resources in Development Plans, including aggregate recycling facilities.</p> <p>DB Cargo also supports the requirement for Development Plans to safeguard wharves and/or railheads with existing or potential capacity for aggregate distribution and/or processing to minimise the movement of aggregates by road and maximise the movement of aggregates by sustainable modes.</p> <p>DB Cargo support the reference in supporting text 9.10.4 to the importance of railway depots for importing crushed rock from other parts of the UK and recognition that Railheads are vital to the sustainable movement of aggregates and boroughs should protect them.</p> <p>However, DB Cargo consider that these references should be included in Policy SI10, rather than in supporting text.</p>



Appendix 1: DB Cargo rail freight assets, London

Rail freight assets
Acton Yard
Barking Eurohub
Barking Ripple Lane
Bow East
Bramdean Sidings
Hither Green
Cricklewood
Langley Sidings
Neasden South Sidings
St. Pancras
Southall West Sidings
Wembley Yard
Willesden Euroterminal