

Draft LONDON PLAN

Freight on Rail thanks TfL for the opportunity to comment on the Draft London Plan.

Freight on Rail, a partnership of the rail freight industry, the transport trade unions and Campaign for Better Transport, works to promote the economic, social and environmental benefits of rail freight to local, devolved and central Government.

Summary

Rail freight has an important role in supporting the Mayor's current and future aspirations for the capital by providing low emissions safer delivery of freight which greatly reduces road congestion and road infrastructure damage. So we welcome the draft London Plan's support for rail freight and its recognition of the importance of protecting key suitable road rail transfer sites, which are limited.

Currently rail delivers almost 50 per cent of aggregates into London and there is considerable demand for more rail freight services. In particular more rail freight terminals are needed to service this demand. Therefore, we would like to see existing and potential rail freight sites protected in line with the way wharves for water freight are protected.

Rail freight can and should have a big role in servicing housing projects within the capital as long as suitable sites, with good rail and road connections are available. That is why Barnet Council's approval in early February for a modern rail freight terminal on existing rail lands at Cricklewood, North London to service the £4.5 billion Brent Cross housing regeneration, was so important, as was TfL's support for the application. Without the rail terminal, building between 7000 -8000 apartments would not be viable as all these construction materials would have to be delivered by heavy goods vehicles (HGVs) with all the associated congestion, pollution and safety impacts.

In terms of retail goods, intermodal terminals and rail linked warehousing is important, such as the facilities at Barking, Tilbury and London Gateway.

Detailed comments

Policy SD2 P57 Wider collaboration in the wider South East

We support this policy in terms of the following text - and waste management (including the



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promotion of Circular Economies); wider needs for freight, logistics and port facilities; and scope for the substitution of business and industrial capacity where mutual benefits can be achieved.

Policy SD4 Central zone Page 67

We support this policy item M *Sufficient capacity for industry and logistics should be identified and protected, including last mile distribution, freight consolidation 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.

Policy E4 Land for industry, logistics and services to support London's economic function: Page 232

We strongly support this policy which gives explicit support for rail linked facilities in A5, D1 and crucially its policy which allows for 'no net loss' of industrial land

Additionally, we would like to see the provision for secondary materials and waste management (clause 3) Policy E4 also includes specific provision for '*minerals importation and processing/manufacturing*' capacity eg asphalt plants, concrete batching plants, at suitable industrial sites, reflecting the acknowledgement in para 9.10.5 that such sites may be particularly appropriate for 'depots' (taken as meaning a range of minerals operations – but the definition should be clarified).

Strategic Policy to transport T1 Page 402

Freight on Rail supports this policy with regard to paragraph 10.1.3 *The Mayor will work with partners to minimise servicing and delivery trips on the road network including through consolidation. He will promote efficient and sustainable essential freight functions, including by road, rail, water and, for shorter distances, bicycle.*

Policy T2 Healthy streets Page 403

Development plans should encourage modal shift to rail to encourage healthy streets in terms of emissions and safer streets. Rail is safer and will encourage more use of bicycles and walking

P407 Indicative list of transport schemes

Freight consolidation programme should state that consolidation programmes should be rail connected or rail serviceable where possible.

P409 Indicative list of transport schemes continued



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National Rail freight upgrades, especially to enable

freight to bypass London- this statement should be qualified to state that to enable freight from Haven ports to avoid London, as rail freight from Tilbury and London Gateway will always have to use London rail routes.

Policy T7 Freight and Servicing: Page 430

We strongly support the safeguarding wharves and railheads involved in distribution of aggregates (clause C) [the policy should refer to Policy SI15 rather than SI5].

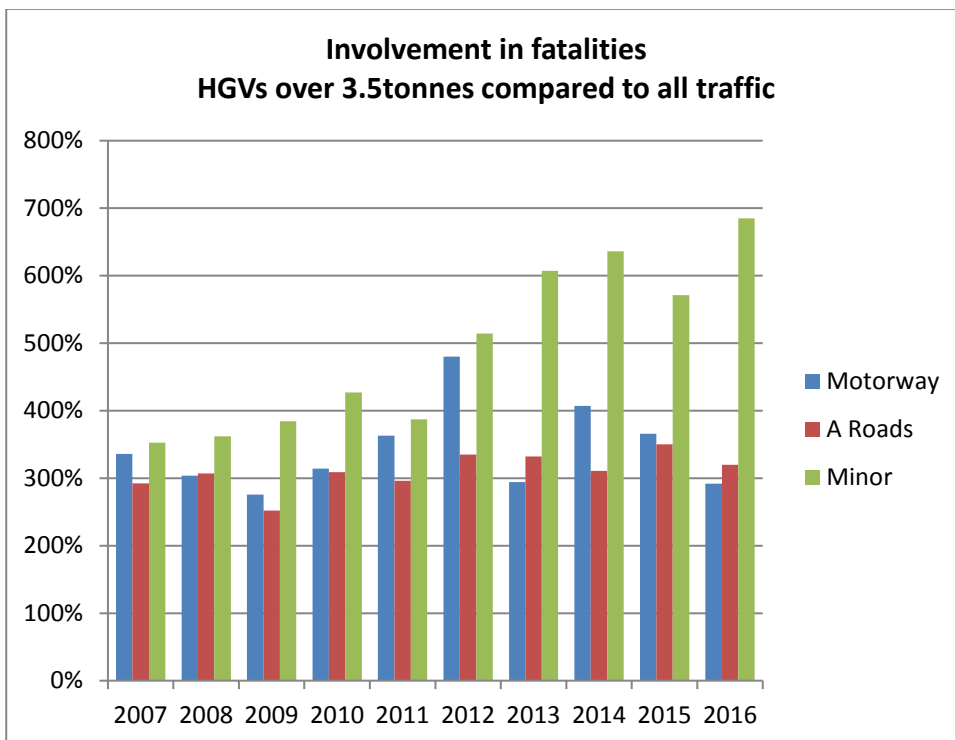
Page 431 Wharves and railheads involved in the distribution of aggregates should

be safeguarded in line with Policy SI9 Safeguarded waste sites, Policy

SI10 Aggregates and Policy SI5 Water infrastructure.

Page 432 10.7.1 An efficient freight network is necessary to support the function of the city. This policy seeks to facilitate sustainable freight movement in London through consolidation, modal shift.

10.7.3 The Mayor will work with all relevant partners to improve the safety and efficiency of freight. It should be noted that rail freight is safer than HGVs, especially in urban conditions as this table shows.



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We would strongly advise TfL to only allow 7ft longer semi-trailers which have dangerous extended tail swing and blind spot, on authorised designated routes within the capital on safety grounds.

<http://www.freightonrail.org.uk/7ftlongerHGVs.htm>

Page 523 Potential rail freight sites should be safeguarded in the way that wharves are protected.

Safeguarded wharves

A network of sites that have been safeguarded for cargo handling uses such as intraport or transshipment movements and freight-related purposes by Safeguarding Directions. Sites that are safeguarded are set out in the Safeguarded Wharves Review (2017/2018).

Policy D12 Agent of Change

We support the policy, which should be a valuable tool in ensuring that noise sensitive development does not unreasonably constrain or impact on operation of activities including transport, handling and processing of minerals, including rail depots as well as wharves. Appropriate mitigation must be carried out to limit the adverse impacts on neighbours.

Policy D13 Noise

We support the policy which should be a valuable tool in ensuring that noise sensitive development does not unreasonably constrain or impact on operation of activities including transport, handling and processing of minerals, including rail depots as well as wharves.

Policy SI10 Aggregates

We support the carrying forward of the apportionment for primary aggregates to 4 boroughs (from the existing London Plan), the provision for safeguarding of resources, recycling facilities, and wharves and rail depots. Continuing with the apportionment levels is justified given evidence of construction demand and increasing investment by industry in submitting planning applications within London. Maintaining the apportionment levels recognises that demand is likely to increase over the Plan period, particularly given planned levels of development and provides a positive context for consideration of applications. London currently imports 97% of primary aggregates but indigenous production is an important part of the mix of supply.

Furthermore, we support the requirement to maintain a landbank (as the apportionment) of permitted reserves throughout the Plan period, and recommend that some clarification is provided in terms of the overall tonnage that needs to be permitted over the Plan period (ie 0.7 million tonnes per annum x 25 = 17.5mt).



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We recommend that policy SI10 (clause D) is extended to also apply the 'Agent of Change' principle to safeguarding of rail depots and other minerals infrastructure (in line with NPPF) that is applied to wharves through Policy SI15. The designing-in of mitigation to 'agent of change' development at an early stage (particularly to reduce noise impacts) is equally important for rail depots as wharves.

We recommend that Clause D should also not solely relate to the 'environmental impact of aggregates' but also to 'ensure the steady, adequate and sustainable supply' (to properly reflect the purpose of the policy in enabling a 'reliable supply of construction materials referred to in para 9.10.1), and the safeguarding will be achieved in part through application of the Agent of Change principle.

Policy SI15 Water Transport

We support the encouragement of greater use of the river for freight transport, and to enable this, the safeguarding of wharves and wharf capacity from other types of development, and increased use/re-activation.

We support the 'Agent of Change' principle, that development adjacent to or opposite safeguarded wharves should be designed to minimise the potential for conflicts of use and disturbance (clauses G & H). This will be essential to ensure that potentially conflicting uses can co-exist, and has already been demonstrated at some developments within the Greenwich Millenium Village but less successfully elsewhere. The 'Agent of Change' principle also needs to apply to rail depots and other infrastructure as well as to wharves, as recommended in our comments on Policy SI10.

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