

# Gazeley UK Ltd. comments

Page: [Policy E4 Land for industry, logistics and services to support London's economic function](#)

Section: [N/A](#)

Gazeley welcome Policy E4 'Land for industry, logistics and services to support London's economic function' statement that provision should be made for 'land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure' and that 'The retention and provision of additional industrial capacity should be prioritised in locations that are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport'

We believe, however, that planning policy should go further and recognise that land along the river and along the main rail routes into London is a precious commodity and that, where it is - or can be - linked to the strategic road network for onward distribution, there should be a presumption in favour of transport and logistics use. By definition, modal transfer from these low-carbon modes to (electrically-powered) road vehicles for final delivery can only take place along the key water and rail arteries.

Such a land use strategy is crucial, since we believe that one of the most attractive options for reducing emissions from logistics activity in London (consistent with Policy SI1) is to convey freight, both consumer goods and bulk materials, from source or distribution centre by electrically-hauled train to intermodal terminals on the edge of the city (e.g. Willesden or Cricklewood), from where it could be delivered by electrically powered lorries to final destination, be it a store, online shopping collection point or construction site. The limited operating range of electric lorries is less of a constraint with such short distance deliveries and this model would avoid the cost and time penalties associated with consolidation centres. The reverse logistics of roll cages, packaging materials and recycling/waste can use the same intermodal terminals, containers and trains on the return leg (consistent with Policy SI8).

We recommend that a criteria-based evaluation should be undertaken to identify which sites should be earmarked for these crucial modal transfer activities and that there should then be a presumption in favour of such development at these sites. The principle criteria should be that a rail connection to the site could be provided and that it is, or could be, connected to the urban road network for the final leg of the delivery.

In many cases the air space above an intermodal terminal can be used for other purposes and thus the footprint need not be 'sterilised' - this principle is already in use in France, with a recently-commissioned modal transfer facility in Paris, and is fully consistent with the Intensification proposal in Policy E7. Within London, the air space above a rail-fed concrete plant at Westbourne Park is largely occupied by a TfL bus garage and we believe there is considerable scope to create further such applications along the main rail corridors into London. It may not be sensible for residential development to be co-located with a modal transfer facility, but industrial, commercial and logistics land uses would be suitable for co-location and could be transferred from other sites, which would thus be freed up for housing.

In line with our comments on Policy E4, we have carried out a 'first pass' analysis using the suggested criteria and have identified a number of new locations for rail-road modal transfer activity - note these are additional to sites that are already in such use. The new sites we propose for inclusion in Table 6.3 and Figure 6.2 are:

1. Southall linked to the A3005
2. Old Oak Common/Wormwood Scrubs linking to the A219
3. Greenford linked to the A4127
4. Park Royal
5. Willesden Junction, linked to the A406/B4492/A4000
6. Neasden, linked to the A406/B4557
7. Cricklewood, linked to the A5/A406
8. Hornsey/Wood Green, linked to the A504/B138/A1080

9. Edmonton, linked to A406
10. Lea Valley, Leyton to Waltham Abbey, using A1055/A110/A406/A503/A104/A106
11. Bow/Stratford, linked to A102
12. Dagenham, linked to A13
13. Charlton, linked to A206/A102
14. Hither Green, linked to A205/A2212
15. Deptford, linked to B207
16. Selhurst/Norwood, linked to A213
17. Clapham North/Nine Elms, linked to A3036/B224/A3216/A3205
18. Tolworth, linked to A240/A3
19. Feltham, linked to A312/A314
20. Wandsworth, linked to A3209/A3205
21. South Acton/Gunnersbury, linked to A406/A315

This list is not intended to be exhaustive, but to give an indication of the locations that should be identified for modal interchange and accorded a presumption in favour of such use. They range in size, capability and distance from central London but, by linking rail and electric road vehicles, could each perform a crucial role in decarbonising and reducing emissions from freight and logistics across London.

Page: [Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function](#)

Section: N/A

Gazeley supports the intensified use of industrial land and the introduction of mixed uses providing that the primary industrial uses are not compromised. The industrial uses should remain the primary and prominent use and the introduction of alternative uses must have the ability of being complementary.

Creative and innovative thinking as to how industrial and residential uses can co-exist is to be encouraged but not at the expense of any net loss of industrial floorspace.

Page: [Policy E6 Locally Significant Industrial Sites](#)

Section: N/A

As with SIL, LSIS should be afforded protection from uses outside of the B use classes. Policy E6 needs to go further to offer protection for LSIS. Once these sites are lost to competing uses such as residential (where land values are significantly higher) they are lost forever and the ability to service and meet London's economic function will be displaced further away from where consumer demand exists. This inevitably will increase delivery times, which increases congestion and results in environmental harm. Additional costs associated with delays etc. will be passed on to consumers.

Page: [Policy E5 Strategic Industrial Locations \(SIL\)](#)

Section: [N/A](#)

Policy E5 needs to clearly and strongly protect against the loss of Strategic Industrial Locations (SIL). In order for London continue to grow, thrive and function the ability to service and support existing and future residential development needs to be maintained. The only way this can be achieved is ceasing the continued loss of industrial land for alternative uses such as a residential. As the population of London becomes more reliant on e-retailing to meet consumer needs, the industrial infrastructure required to support this demand must be protected. SIL allocations need to be protected at all costs.

Gazeley supports the intensification of SIL however individual Local Authorities must not see intensification as a substitute for allocating new fit for purpose industrial land required to meet London's needs. The identified SIL are already densely developed and often comprise a multitude of landownerships consequently limited opportunities exist for intensification. Where intensification is achievable on a windfall basis this should be recognised as being in addition to identifying new industrial land to meet employment land targets.