

The John Lewis Partnership London Plan consultation Response March 2018

The John Lewis Partnership welcomes the opportunity to respond to the Mayor's draft London Plan. The contents of this response are predominantly focussed on freight, as this has been submitted from a transport perspective.

Summary and key recommendations

- **The principle of 'no net loss of industrial floorspace capacity' does not go far enough.** Too much logistics and industrial land has been lost over the years. London's growing population will increase demand for deliveries and servicing activity and therefore land needs to be in place to support this. The principle of 'No net loss of industrial *floorspace*' is not the same as the same as 'no net loss of *land*' and relies too much on intensification. For logistics, open land and vehicle storage areas are required. In addition, it only applies to *designated* industrial land which is just 64 per cent of industrial land meaning that 36 per cent is at risk. The base level of industrial land is low already, but capacity needs to be in the right geographical area.
- **Assist fleets with shifting to alternatively fuelled vehicles** by facilitating the provision of refuelling and recharging infrastructure and incentives to enable the right market conditions for uptake.
- **The London Plan should include a requirement to construct new lorry parking facilities for drivers to take their legally mandated breaks during the day and overnight.**
- **New developments should be designed and managed so that deliveries can be received outside of peak hours** and if necessary in the evening or night-time without causing unacceptable nuisance to residents.
- **Provide ample kerbside loading/unloading facilities to enable deliveries to be made efficiently, safely and legally.** Large new developments or change of use should trigger an area-wide review of the signs and lines and every high street should have a periodic review at least every five years to ensure that the facilities are still fit for purpose.
- **Provide a new network of river crossings in East London** including the Silvertown Tunnel and crossings at Belvedere and Gallions Reach to reduce congestion and unlock growth opportunities.
- **The appointment of a Freight Commissioner for London** to deliver a strategic vision for freight.
- **Boroughs should be encouraged to identify low density retail sites for higher density mixed use intensification schemes and to support such development** above shops, as discussed in policy SD8. We also support the emphasis on design in delivering high density flexible schemes.

Additional comments

Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function *page 246* **Intensification**

While we support intensification and efficient use of land, planning policy also needs to ensure that there is sufficient access and land available for logistics operations to underpin London's economic activity. The approach proposed in the draft Plan does not work for many logistics operations. However, there may be opportunities here for other industrial uses and there should be clear examples and case studies of where this works and where it is less appropriate.

Co-location

Where there are mixed use developments, these ideally should be industrial developer-led to ensure that they are developed in a way that supports both mixed residential and industrial use, to support good growth.. he plan needs to be specific about which uses can be co-located and which cannot.

Substitution

Land will always have a higher value for residential over industrial/logistics uses, therefore it is important that all avenues are explored before any release for other purposes.

Policy SI3 Energy Infrastructure page 329

This policy recognises that electricity demand is expected to increase due to several factors including the increased take up of electric vehicles. Fleets operating electric vehicles require overnight charging for multiple vehicles. With many electricity substations at or near to capacity in a number of areas across the capital, this is likely to require investment in the network. However, that cost should not fall on companies which are already paying significant additional capital costs for vehicles over fossil fuel equivalents and will make the business case for investment in cleaner vehicles unviable.

For larger vehicles, where gas is a more viable alternative to diesel, appropriate refuelling infrastructure is essential. However, such vehicles come at a significant cost premium, so other incentives such as exemptions from the Congestion Charge and the London Lorry Control Scheme (gas vehicles are significantly quieter) would help enable their uptake.

Policy T2 Healthy Streets page 403

The John Lewis Partnership supports the overall aim of this policy. However there should be recognition of the important role that freight and deliveries play in the capital, not just in terms of servicing businesses, but also residents. If Londoners are to be encouraged to not use cars or to be more reliant on public transport, they will be even more dependent on the freight industry. Section 10.2.5 should be reworded to say that 'the Mayor will *continue* to work with the freight industry, its customers and London's boroughs to develop creative solutions to managing freight and deliveries. This is in recognition of the good work that has already taken place and continues. The John Lewis Partnership is always looking to optimise efficiency in its deliveries, both in terms of greener technology and delivery consolidation. The role that the Mayor, TfL and the boroughs can play is in supplying the right support for this, such as reforming the London Lorry Control Scheme, reviewing night-time delivery restrictions and ensuring appropriate kerbside access is available at the times of day required.

Policy T3 Transport capacity, connectivity and safeguarding page 406

East London River Crossings

The John Lewis Partnership welcomes the recognition of good transport connectivity. In particular we support the inclusion of East London River Crossings in the plan. Cross-river road connectivity in East London is extremely poor in comparison to West London. The Blackwall & Rotherhithe Tunnels are key entry points for Partnership deliveries into the capital's network.

These locations are unreliable and the regular congestion around it means the local area suffers particularly from poor air quality. East London is also one of the major growth areas in the capital for new housing and jobs. But to ensure its success, it needs the infrastructure to underpin it. We fully support the proposals for a new crossing at Silvertown as well as plans for additional crossings further east at Gallions Reach and Belvedere to create a network of river crossings. This will spread the traffic wishing to cross the river, leading to shorter and more efficient journeys and lightening the burden on local communities.

However, user charging should take into consideration the value of the trip, so essential deliveries and servicing activity should not be made to shoulder the costs.

Policy T5 Cycling *page 414*

London's roads are currently undergoing huge changes with the reallocation of road space to cyclists and the development of the new stretches of segregated and non-segregated cycling infrastructure. The John Lewis Partnership supports this approach in principle, both the intention to engineer the roads to improve safety for cyclists, as well as to encourage more people to switch from private cars to bikes. However, it is essential that the correct balance is achieved between the needs of different road users so that best use is made of limited road space to benefit London overall.

Plans for any new segregated routes must consider access to the kerbside for deliveries and servicing activity and potential increases in journey times. Ensuring that these routes are well planned and that freight needs are considered from the outset is essential to ensure that all road users can be accommodated safely and comfortably on London's streets.

We urge the Mayor to ensure that all future schemes are well planned and take account of freight, delivery and servicing needs from the outset so that effective mitigation can be introduced against congestion and increasing emissions from changes to journey routes, as any works are undertaken.

Policy T7 Freight and servicing *page 430*

As with Policy T2, the overall view relating to freight and deliveries needs consideration. There should be recognition of the vital role that deliveries and servicing plays in people's everyday lives, for John Lewis and Waitrose deliveries to our stores, work and home addresses. The freight industry including John Lewis operates its vehicle fleet on tight margins and delivery windows and is always looking to optimise efficiency. The role that the Mayor, TfL and the boroughs can play is in supplying the right policy support such as reforming the London Lorry Control Scheme, reviewing night-time delivery restrictions and ensuring appropriate kerbside access is available at the times of day required.

Section 10.7.2 states that 'lorries and vans are often less than half full'.

Much of the van traffic on London's roads is engaged in servicing activity rather than deliveries and will therefore not be full to capacity with goods as that is not the main use of the vehicle. Many trips will be multi-drop and therefore it will be impossible for them to be full at all times. For example, John Lewis home delivery vehicles will always start their journeys full and the load will diminish as deliveries are carried out. Waitrose and John Lewis distribution vehicles will again start with a full load, and after delivery will often bring loads back from stores for example empty goods cages and stock. This is not to say that there is no opportunity for greater efficiencies, but the wording of this section needs to be reviewed.

Consolidation and distribution centres

Many operators will already have heavily consolidated deliveries as part of their supply chain; retail is a good example of this. The John Lewis Partnership has regional distribution and delivery centres in North, South & West London, Kent & Berkshire.

'Consolidation centres' can play a role in controlling and potentially reducing the number of freight vehicle movements into urban centres in certain circumstances. However, they should be targeted at vehicles which are not full to capacity rather than breaking up fully consolidated loads, as this could lead to more vehicles on the road, not fewer. In addition, consolidation centres would not work for time-critical deliveries such as fresh produce express mail and parcels.

The question of funding is also important as adding another link to the supply chain will incur cost, so it is likely that there will need to be some ongoing public funding.

Consolidation centres only work if they are in the optimum strategic position. The lack of industrial land due to rising land values in London is pushing distribution sites out of the

capital, leading to longer journeys and also an increase in vehicle movements. This is because EU Drivers' Hours rules limit the number of hours a driver can drive, effectively governing the length of a shift. In addition, companies have customer service levels to meet, so if journeys take longer to complete, then logistics firms are likely to react by increasing the numbers of vehicles they deploy, adding to costs, emissions and congestion.

Retiming

To enable more deliveries to be retimed, the John Lewis Partnership urges the Mayor to work with boroughs to review night-time delivery restrictions; with London Councils on their review of the London Lorry Control Scheme; and with businesses to procure goods and services in a way that minimises freight movements, particularly at peak times.

Direct vision

The plan refers to the use of vehicles with increased direct vision (on page 233 and under the list of transport schemes on page 408). Standards for HGVs should be set at a national or international level as manufacturers design vehicles for a European market not by individual cities. This could lead to London becoming a niche market for the manufacturers, increasing the costs of new vehicles.

There must be a clear evidence base for new standards, otherwise we cannot be sure that the additional investment required will actually lead to improved safety. Whilst increasing direct vision has a role to play, it is not the most effective way of addressing safety issues and technical developments will mitigate the requirement for improved direct vision. Often cameras and mirrors will give drivers a view that no amount of direct vision will be able to replace, this can also incorporate ongoing driver safety training. The John Lewis Partnership welcomes the announcement by TfL in September 2017 recognising that a more holistic approach should be adopted for the scheme to be introduced in 2020. However, the details of what the new 'safe system' will look like and how the permit scheme will be administered are far from certain and the delays in confirming which vehicles will be affected is significantly disrupting operators planning to achieve the ULEZ requirements in 2019.

Freight Commissioner

Until the end of last year, Transport for London had one of the most established and experienced freight teams in the world. However, now freight is embedded across TfL rather than sitting in one distinct team. Whilst this may have benefits in terms of ensuring that freight is considered in every aspect of TfL's work, there is also a concern that it may be diluted. The appointment of a Freight Commissioner for London to create a vision for enabling efficient logistics and to develop a world-class freight and logistics environment in the capital would bring significant benefits. A Commissioner, working directly under the Mayor, would help ensure the effective implementation of the London Plan and the Mayor's Transport Strategy for freight.

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