

Transworth Rail comments

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

Section: [N/A](#)

We 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.

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

Section: [N/A](#)

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, sites between 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 SI10 Aggregates](#)

Section: [N/A](#)

We welcome Policy SI10's position that ' An adequate supply of aggregates to support construction in London will be achieved by (inter alia) importing aggregates to London by sustainable transport modes ' and that 'Development Plans should 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.' We agree that 'Existing and future wharf capacity is essential, especially for transporting marine-dredged aggregates, and should be protected in accordance with Policy SI15 Water transport. However, **equally important are railway depots** for importing crushed rock from other parts of the UK. Railheads are vital to the sustainable movement of aggregates and, particularly as rail provides far superior coverage across London than the river, **boroughs should protect them.**

Page: [Policy SI15 Water transport](#)

Section: [N/A](#)

We welcome Policies SI15 regarding the strategic role of London's waterways and the protection of wharves for freight and industrial use. **We would, however, recommend strongly that similar policies should be adopted for the protection and development of London's rail infrastructure for freight and logistics activity.** Whilst the river has a vital role to play, rail can offer much wider coverage across London boroughs and is a viable alternative to road for Fast Moving Consumer Goods, including chilled and frozen products (which already move by rail in the UK on a daily basis), for which water transport is not really a viable option.

Page: [Policy T7 Freight and servicing](#)

Section: [N/A](#)

We wholeheartedly support Policy T7 and it's recognition that 'An efficient freight network is necessary to support the function of the city. We welcome its endorsement of sustainable freight movement to reduce the impact on road congestion and air quality. We particularly welcome the commitment that 'Development proposals for new consolidation and distribution facilities should be supported provided that (inter alia) they deliver mode shift from road to rail or water'. **We would, however, oppose the provisos that this should be 'without adversely impacting passenger services (existing or planned) and without generating significant increases in street-based movements'.** Whilst we understand the views behind such sentiments, there may be instances where, for example, to achieve the optimum overall policy outcome (e.g. on air quality and road safety), it would be preferable to accept slightly lower off peak (note, not peak) passenger service frequencies. We believe it could constrain crucial developments and hinder the achievement of the Mayor's overall policy objectives if these provisos were included as 'tablets of stone'.