



## **Executive summary**

### **About The United Kingdom Warehousing Association (UKWA)**

UKWA is Britain's leading trade organisation for the logistics sector, with more than 650 members.

UKWA members include warehousing and logistics providers as well as manufacturers, retailers, wholesalers and suppliers to the logistics industry.

#### **Our mission**

- protect and advance the interests of members
- support business development
- promote industry best practice

### **Special research commissioned in 2016 - Feeding London 2030 – Facing the logistical challenge**

Commissioned by UKWA and delivered by research specialists Global 78, Feeding London 2030 has been hailed by industry leaders as a timely and valuable source of data for all stakeholders in the food & beverage and food service supply chains. Challenges it examines in detail include:

- Increasingly congested urban environment.
- New consumer demands for food and drink.
- Demand for delivery frequencies, times and volumes.
- Changing Grocery Retail sector including convenience stores and home delivery.
- Hospitality and Food Service (Catering) sector scale, locations and unique demands.
- High dependency on vans in delivery vehicle fleets.



- Maintaining food hygiene and food safety.
- Handling food waste and other waste streams.

## **Introduction**

The UKWA welcomes the publication of the London Mayor's Draft London Plan and the opportunity to respond to it.

## **General comments**

The logistics sector is vital in ensuring not only that London remains economically competitive but also to make sure that its residents and businesses continue to have access to the range of goods and services that they need on a daily basis. Ensuring the sector can function efficiently and effectively is a key necessity to the efficient working of the capital's economy and the well-being of its residents.

According to the GLA's own evidence base, land for industry and logistics is being lost at three times the anticipated level of release in the current London Plan, a rate which is harmful and unsustainable. This is happening despite there being a policy in the current London Plan to ensure that London protects and retains the land it needs to for these key purposes. It is therefore essential that this draft London Plan ensures an adequate supply of appropriate land for the logistics and warehousing sectors is maintained in the appropriate locations and at affordable costs to prevent unsustainable losses of capacity. Where any losses occur these should be rebalanced through allocating new land in the right locations and at the right price to ensure London retains the warehousing and logistics capacity it needs to sustain London's residents and economic growth.

## **UKWA's key concerns are:**

- **There already is insufficient capacity for warehousing and logistics in the capital and the current ambition is only to maintain this by setting a target of 'no net loss' rather than providing for new capacity.**
- **Intensification of industrial land is not the silver bullet – and a more balanced approach should be taken to make sure we safe guard and where possible increase warehousing and logistic sites.**
- **There should be a stronger policy protection of warehouse and industrial uses particularly for non-designated industrial sites.**

- **The Plan should give a much stronger recognition for the need for open yard and storage space.** Policy E7 should recognise that yard space should be re-provided in new developments and should be a priority for new logistics sites.

**Comments on specific policies:**

Policies	UKWA's Comments
<b>Policy GG5</b> <b>Growing a good economy</b> To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:	
<b>GG5C</b> Plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.	UKWA welcomes this policy but would like to see this strengthened to stress the need for warehousing and logistic space which is vital to maintain London's economy and global competitiveness.
<b>Policy SD1</b> <b>Opportunity Areas</b>	
<b>SD1B</b> Boroughs, through Development Plans and decisions, should: <ol style="list-style-type: none"> <li>1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas</li> <li>2) Support development which creates employment opportunities and housing choices for Londoners</li> <li>3) Plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary</li> <li>4) Recognise that larger areas can define their own character and density</li> <li>5) Support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with 'Policy E4 Land for industry, logistics and services to support London's economic function', 'Policy E5 Strategic Industrial Locations (SIL)', 'Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support</li> </ol>	We welcome the recognition for there to be 'no net loss' of industrial floorspace and the plans approach to intensify industrial land uses to release capacity for further industrial and logistics uses, we are concerned that this will not meet the sectors needs and multi-storey developments will not be feasible or viable on many sites and therefore this is not a viable solution.  5) UKWA has major concerns that there is a mismatch in part B (5) of the need to maintain industrial capacity within SILs in OAS and the ability of the OAs to meet or exceed the plan's growth targets. This needs further clarification and safe guards

	<p>London's economic function'</p> <ol style="list-style-type: none"> <li>6) Meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12.</li> <li>7) Include ambitious transport mode share targets</li> <li>8) Support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with 'Policy SD10 Strategic and local regeneration'</li> <li>9) Ensure planning frameworks are subject to public and stakeholder consultation</li> <li>10) Work with the Mayor, local communities and other stakeholders to review appropriate locations and identify new Opportunity Areas. These should be distinct and significant locations that have capacity for at least 5,000 new jobs and/or 2,500 new homes.</li> </ol>	but in place.
<b>Policy SD4</b>	<b>The Central Activities Zone (CAZ)</b>	
<b>SD4M</b>	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.	This policy should require boroughs and stakeholders to identify and provide space for warehousing/consolidation/urban logistics space to enable last mile deliveries.
<b>Policy SD6</b>	<b>Town Centres</b>	
<b>SD6A</b>	<p>London's varied town centres and their vitality and viability should be promoted and enhanced as:</p> <ol style="list-style-type: none"> <li>1) Strong, resilient, accessible, inclusive and viable hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development.</li> <li>2) Locations for mixed-use or housing-led intensification and higher-density renewal, securing a high quality environment and complementing local character and heritage assets</li> </ol>	Missing from this is the provision for warehousing/consolidation/urban logistics space to enable last mile deliveries.

	<ol style="list-style-type: none"> <li>3) The structure for delivering sustainable access by walking, cycling and public transport to a competitive range of services and activities</li> <li>4) The main focus for Londoners' sense of place and local identity in the capital</li> <li>5) The primary locations for commercial activity beyond the CAZ and important contributors to the local as well as London-wide economy</li> </ol> <p>A key mechanism for building sustainable, healthy, walkable neighbourhoods with the Healthy Streets Approach embedded in their development and management</p>	
<b>Policy E4</b>	<b>Land for industry, logistics and services to support London's economic function</b>	
<b>E4A</b>	<p>A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be maintained. This should make provision for:</p> <ol style="list-style-type: none"> <li>1) Light and general industrial uses</li> <li>2) Storage and logistics/distribution including 'last mile' distribution close to central London and the Northern Isle of Dogs, consolidation centres and collection points</li> <li>3) Secondary materials and waste management</li> <li>4) Utilities infrastructure</li> <li>5) Land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure</li> <li>6) Wholesale markets</li> <li>7) Emerging industrial-related sectors</li> <li>8) Flexible (B1c/B2/B8) hybrid space to accommodate services that support the wider London economy and population</li> </ol> <p>Low-cost industrial and related space for micro, small and medium-sized enterprises (see also 'Policy E2 Low-cost business space') taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution (see 'Policy E7 Intensification, co-location and substitution of land for industry, logistics and</p>	<p>UKWA welcome this and strongly supports E4A</p>

	services to support London's economic function').	
E4B	<p>London's land and premises for industry, logistics and services falls into three categories:</p> <ol style="list-style-type: none"> <li>1) Strategic Industrial Locations (SIL) – see 'Policy E5 Strategic Industrial Locations (SIL)'</li> <li>2) Locally Significant Industrial Sites (LSIS) - see 'Policy E6 Locally Significant Industrial Sites'</li> </ol> <p>Non-Designated Industrial Sites – sites containing industrial and related functions that are not formally designated as SIL or LSIS in a Local Plan</p>	
E4C	<ol style="list-style-type: none"> <li>1) The retention and provision of industrial capacity across the three categories of industrial land set out in part B should be planned, monitored and managed, having regard to the industrial property market area and borough-level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS. Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution set out in 'Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function'.</li> </ol>	<p>The categorisations as set out in figure 6.1 and table 6.2 states that new industrial space should only be provided in a small number of locations including Enfield, Brent, Ealing, Sutton and Wandsworth and the OPDC. UKWA are extremely concerned by this and are of the view that the provision of additional industrial capacity must be encouraged and enabled across all the London Boroughs, through their development plan process. Intensification and co-locations should not be relied upon as the solution to deliver the additional capacity needed as we have serious concerns on there being enough suitable sites for this to happen. A new approach to finding new sites is needed and boroughs should be encouraged to find these new sites by new bold ways of thinking. Therefore we would like to see an additional point: the provision of new land is encouraged and managed through borough development plan processes.</p> <p>UKWA also would like to see how the 'no net loss' principle is going to be applied to the non-designated land as a number of warehousing units are in these areas.</p>
E4D	<p>The retention and provision of additional industrial capacity should be prioritised in locations that:</p> <ol style="list-style-type: none"> <li>1) Are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport</li> <li>2) Provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London's</li> </ol>	We support this measure.

	<p>economy and population</p> <p>3) Provide capacity for micro, small and medium-sized enterprises Are suitable for 'last mile' distribution services to support large-scale residential or mixed-use development subject to existing provision.</p>	
E4E	Any release of industrial capacity in line with part C should be focused in locations that are (or are planned to be) well-connected by public transport, walking and cycling and contribute to other planning priorities including housing (and particularly affordable housing), schools and other infrastructure.	We support this measure.
E4F	Efficient wholesale market functions should be retained to meet London's requirements whilst enabling opportunities to consolidate composite wholesale markets to meet long-term wholesaling needs.	
E4G	Boroughs should ensure that the need to retain sufficient industrial and logistics capacity is not undermined by permitted development rights by introducing Article 4 Directions where appropriate.	We support this measure.
E4H	Development proposals for large-scale (greater than 2,500 sqm GIA) industrial floorspace should consider the scope to provide smaller industrial units suitable for SMEs, in particular where there is a local shortage and demand for such space.	We support this measure.
<b>Policy E5</b>	<b>Strategic Industrial Locations (SIL)</b>	
E5A	<p>9) Strategic Industrial Locations (identified in Figure 6.2 and Table 6.3) should be managed proactively through a plan-led process to sustain them as London's main reservoirs of industrial, logistics and related capacity for uses that support the functioning of London's economy.</p>	<p>It is vital that sufficient, appropriately located and designed land for logistics and freight operations is made available across London. Whilst the intention to move to sustainable transport functions is understood, the delivery of this policy should not be undertaken until sufficient relevant infrastructure is in place. If there are shortfalls the result could be shortages or increased costs for supplying and servicing London.</p> <p>9) We welcome the proposal to ensure sufficient availability of low-cost industrial and related space for micro and small businesses. Finding appropriate, affordable</p>

		space is a continuous challenge for small and micro businesses.
ESB	<p>Boroughs, in their Development Plans, should:</p> <ol style="list-style-type: none"> <li>1) Define the detailed boundary of SILs in policies maps having regard to the scope for intensification, co-location and substitution (set out in 'Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function'), and use the adopted Local Plan SIL boundary as the basis for decision-making</li> <li>2) Develop local policies to protect and intensify the function of SILs and enhance their attractiveness and competitiveness (including access improvements and digital connectivity) for the functions set out in part C</li> <li>3) Explore opportunities to intensify and make more efficient use of land in SILs in Development Plan reviews and through Opportunity Area Planning Frameworks in collaboration with the GLA and other planning authorities within and outside London ('Policy E7 Intensifications, co-location and substitution of land for industry, logistics and services to support London's economic function').</li> </ol>	Intensification and co-locations are not the 'silver bullets' and other bolder measures are need to make sure there is sufficient land available. Also this policy doesn't recognise the need for continued investment in the infrastructure including power, water, high level digital connectivity and transport to support the continued success and growth of the SILs.
ESC	<p>Development proposals in SILs should be supported where the uses proposed fall within the broad industrial-type activities set out below:</p> <ol style="list-style-type: none"> <li>1) Light industrial (Use Class B1c)</li> <li>2) General industrial uses (Use Class B2)</li> <li>3) Storage and logistics/distribution uses (Use Class B8)</li> <li>4) Other industrial-type functions, services and activities not falling within the above Use Classes including secondary materials and waste management, utilities infrastructure, land for transport and wholesale markets</li> <li>5) Flexible B1c/B2/B8 premises suitable for occupation by SMEs</li> </ol> <p>Small-scale 'walk to' services for industrial occupiers such as workplace crèches or cafés.</p>	<p>Whilst the intention is for there to be no net loss of industrial floorspace capacity, we feel this is unambitious and could stifle economic growth across the capital. There has been over three times more industrial land lost than set down in the London-wide benchmark in the previous London Plan and around eight times more in central London Boroughs.</p> <p>There should be plans to increase availability of industrial land to ensure the capital can continue to be supplied and serviced throughout the term of this new London Plan.</p> <p>A lot of space will be under the threshold and will be down to Boroughs to monitor – we feel it is going to be difficult for the GLA to measure 'no net loss of space by 2041'</p> <p>Bolder solutions are needed to identify new industrial sites within OAs and in and</p>



		around town centres or other areas identified by the boroughs.
E5E	Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis. In line with Agent of Change principles ('Policy D12 Agent of Change') residential development adjacent to SILs should be designed to ensure that the industrial activities are not compromised or curtailed. Particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation in the residential development.	UKWA welcomes the Agent of Change principle but would like to see it go broader beyond just noise and recognise that issues including traffic, vehicle movements, vibrations, dust and odour are also taken into account. Also the principle needs to allow for expansion and transfer of occupancy.
Policy E7	<b>Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function</b>	
E7A	<p>Development Plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through:</p> <ol style="list-style-type: none"> <li>1) Development of mezzanines</li> <li>2) Introduction of small units</li> <li>3) Development of multi-storey schemes</li> <li>4) Addition of basements</li> </ol> <p>More efficient use of land through higher plot ratios having regard to operational requirements (including servicing) and mitigating impacts on the transport network where necessary</p>	<p>UKWA supports the overarching aim of this policy to encourage more effective and efficient use of land. We are concerned that these practices are as yet unproven in London and believe from both the developer and occupier's perspectives are unlikely to be achievable on many sites in London. There this policy will not deliver the volume or capacity that is envisaged by it. Intensification is only going to work in areas of high demand and cost of delivering the scheme can be sufficiently meet by the rents that would be needed.</p> <p>UKWA would also like to stress that intensification and co-location should be industry led and the right business case is made for this. New logistic and warehousing space to be given priority over the residential needs (UKWA has concerns where cross docking facilities are needed that they would not be compatible with residential demands).</p> <p>The policy should also recognise the need for open yard and storage space</p>
E7B	Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of the SILs could be intensified. Intensification should facilitate the consolidation of the identified SIL to support the delivery of	We support this measure.

	<p>residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process must meet the criteria set out in part E below and ensure that it does not undermine or compromise the integrity or effectiveness of the SIL in accommodating the industrial-type activities identified in part C of 'Policy E5 Strategic Industrial Locations (SIL)'. This approach should only be considered as part of a plan-led process of SIL intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated master planning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications.</p>	<p>It should be recognised that multi-storey developments maybe not deliver or be viable on all SIL sites and boroughs should be given more freedom to manage overall supply as long as there is no net loss and the sites are in the right commercial location.</p>
<p><b>E7C</b></p>	<p>3) Development Plans and planning frameworks should be proactive and consider whether certain logistics, industrial and related functions in selected parts of LSIS could be intensified and or co-located with residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process should meet the criteria set out in part E below. This approach should only be considered as part of a plan-led process of LSIS intensification and consolidation (and clearly defined in Development Plan policies maps) or as part of a co-ordinated master planning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications.</p>	<p>UKWA seeks clarification of the terms intensification and co-located does this mean mixed use developments or more intensive use for industrial and logistic use? Is the intensification intended to provide the capacity for introducing residential uses through co-location?</p> <p>Does co-location mean separation of logistics to residential uses or does it mean residential uses above logistics? There must be clear definitions to avoid any confusion during the life time of the plan.</p>
<p><b>E7D</b></p>	<p>Mixed-use or residential development proposals on Non-designated Industrial Sites will be supported where:</p> <ol style="list-style-type: none"> <li>1) There is no reasonable prospect of the site being used for the industrial and related purposes set out in part A of 'Policy E4 Land for industry, logistics and services to support London's economic function'; or</li> <li>2) It has been allocated in a Development Plan for residential or mixed-use development on the basis of part D.1; or</li> <li>3) Industrial, storage or distribution floorspace is provided as part of mixed-use intensification where this is feasible; or</li> <li>4) Suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and subject to relation support arrangements for existing businesses before the commencement of new development.</li> </ol>	<p>This process must be rigorous and fully evidence based.</p>

	<p>6) Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in parts E.2 to E.4 below.</p>	
E7E	<p>The processes set out in Parts B, C and D above must ensure that:</p> <ol style="list-style-type: none"> <li>1) The industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) or capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing</li> <li>2) 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 agreements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements</li> <li>3) The intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied</li> <li>4) Appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to:             <ol style="list-style-type: none"> <li>a) Safety and security (see 'Policy D10 Safety, security and resilience to emergency' and 'Policy D11 Fire safety')</li> <li>b) The layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict (see 'Policy T4 Assessing and mitigating transport impacts')</li> <li>c) Design quality, public realm, visual impact and amenity for residents (see 'Policy D1 London's form and characteristics', 'Policy D2 Delivering Good Design', 'Policy D3 Inclusive Design', 'Policy D4 Housing quality and standards', 'Policy D5 Accessible housing', 'Policy D6 Optimising housing density', 'Policy D7 Public realm' and 'Policy D8 Tall buildings')</li> <li>d) Vibration and noise (see 'Policy D13 noise')</li> </ol> </li> </ol> <p>Air quality, including dust, odour and emissions (see 'Policy S11 Improving air</p>	<p>This process must be rigorous and fully evidence based.</p>

	quality' and 'Policy SI2 Minimising greenhouse gas emissions').	
E7F	<p>Development Plans and planning frameworks should consider, in collaboration with neighbouring authorities within and outside London, the scope to facilitate the substitution of some of London's industrial capacity to related property markets elsewhere in London and beyond London's boundary where:</p> <ol style="list-style-type: none"> <li>1) This results in mutual advantage to collaboration partners inside and outside London and support a more efficient use of land</li> <li>2) Full regard is given to both the positive and negative impacts of substitution including impacts on servicing the economy inside and outside London, businesses and customers, labour markets and commuting, supply-chain and logistics, congestion, pollution and vehicle miles.</li> <li>3) A clearly-defined strategy for the substitution of future demand capacity and/or relocation arrangements where relevant, is in place to support this process.</li> </ol> <p>This approach should only be considered as part of a plan-led process of consolidation and intensification (and clearly defined in Development Plan policies maps) and not through ad hoc planning applications.</p>	The promotion of substitution of locating industrial and warehousing outside of London is very concerning to UKWA and could lead to more unsustainable travel patterns in London, with increased and longer journeys and the associated air quality implications. It would also lead to loss of employment in the capital and the economic benefits they bring to local boroughs.
Policy D12	<b>Agent of Change</b>	
D12A	The Agent of Change principle places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development.	UKWA welcomes the Agent of Change principle and sees it as fundamental to protecting existing and new logistics and warehousing uses in the capital and ensuring the continued existence. We would like to see this apply to other impacts as well as noise, such as smells and vehicle movements. Long term management of this needs to be taken into account including the transfer to new occupiers or if current occupiers wish to expand the existing premises or new usages and there should be safeguards in place to secure these activities to safeguard against potential complaints and actions.
D12B	Boroughs should ensure that planning decisions reflect the Agent of Change principle and take account of existing noise-generating uses in a sensitive manner	UKWA welcomes this. We would like to see this apply to other impacts as well as

	when new development, particularly residential, is proposed nearby.	noise, such as smells and vehicle movements.
D12C	<p>Development proposals should manage noise and other potential nuisances by:</p> <ol style="list-style-type: none"> <li>1) Ensuring good acoustic design to mitigate and minimise existing and potential impacts of noise generated by existing uses located in the area</li> <li>2) Exploring mitigations measures early in the design stage, with necessary and appropriate provisions secured through planning obligations</li> </ol> <p>Separating new noise-sensitive development where possible from existing noise-generating businesses through distance, screening, internal layout, sound-proofing and insulation, and other acoustic design measures.</p>	UKWA welcomes this. We would like to see this apply to other impacts as well as noise, such as smells and vehicle movements.
D12D	Development should be designed to ensure that established noise-generating venues remain viable and can continue or grow without unreasonable restrictions being placed on them.	UKWA welcomes this. We would like to see this apply to other impacts as well as noise, such as smells and vehicle movements.
D12E	New noise-generating development, such as industrial uses, music venues, pubs, rail infrastructure, schools and sporting venues proposed close to residential and other noise-sensitive development should put in place measures such as soundproofing to mitigate and manage any noise impacts for neighbouring residents and businesses.	UKWA welcomes this. We would like to see this apply to other impacts as well as noise, such as smells and vehicle movements.
D12F	Boroughs should refuse development proposals that have not clearly demonstrated how noise impacts will be mitigated and managed.	UKWA welcomes this. We would like to see this apply to other impacts as well as noise, such as smells and vehicle movements.
<b>Policy T7</b>	<b>Freight and servicing</b>	
T7A	<p>Opportunity Area Planning Frameworks, Area Action Plans and other area-based plans should include freight and servicing strategies. These should seek to:</p> <ol style="list-style-type: none"> <li>1) reduce freight trips to, from and within these areas</li> <li>2) coordinate the provision of infrastructure and facilities to manage freight and servicing at an area-wide level</li> </ol>	Despite paragraph 10.7.1 which notes that an efficient freight network is necessary to support the function of the city, Policy T7A is restrictive and does not facilitate the efficient operation of freight and servicing activities which are vital to London. Some of the other policies in this section seek to safeguard or provide for freight and servicing but the overall tone is of restriction and reduction but not efficiency.

	<p>3) seek to reduce emissions from freight, such as through sustainable last-mile schemes and the provision of rapid electric vehicle charging points for freight vehicles.</p> <p>Such strategies should be developed through policy or through the formulation of a masterplan for a planning application.</p>	The policies should also recognise the need for open yard and storage space
T7B	To support carbon-free travel from 2050, the provision of hydrogen refuelling stations and rapid electric vehicle charging points at logistics and industrial locations is supported.	UKWA supports this
T7C	Wharves and railheads involved in the distribution of aggregates should be safeguarded in line with 'Policy S19 Safeguarded waste sites', 'Policy S110 Aggregates' and 'Policy S15 Water infrastructure'.	Wharves and railheads should also be safeguarded for unit loads as well as aggregates.
T7D	Consolidation and distribution sites at all scales should be designed to enable 24-hour operation to encourage and support out-of-peak deliveries.	UKWA supports this.
T7E	<p>Development proposals for new consolidation and distribution facilities should be supported provided that they:</p> <ol style="list-style-type: none"> <li>1) deliver mode shift from road to rail or water without adversely impacting passenger services (existing or planned) and without generating significant increases in street-based movements</li> <li>2) reduce traffic volumes within London</li> <li>3) reduce emissions from freight and servicing trips</li> <li>4) enable sustainable last-mile movements, including by cycle and electric vehicle.</li> </ol>	<p>UKWA finds that is restrictive and does not facilitate the efficient operation of freight and servicing activities which are vital to London. Some of the other policies in this section seek to safeguard or provide for freight and servicing but the overall tone is of restriction and should be about increasing efficiency and collaboration.</p> <p>The policy should also recognise the need for open yard and storage space</p>
T7F	Development proposals should facilitate sustainable freight and servicing, including through the provision of adequate space for servicing and deliveries off-street. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of	UKWA supports this.

	developments.	
T7G	Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing.	UKWA supports this.
T7H	At large developments, facilities to enable micro-consolidation should be provided, with management arrangements set out in Delivery and Servicing Plans.	UKWA supports this.