

Ross Poulton

From: Neil Sime <neil.sime@victa-railfreight.com>
Sent: 01 March 2018 14:08
To: Londonplan
Subject: DRAFT NEW LONDON PLAN

'Dear Sirs,

Victa Railfreight is a licensed rail Freight Operating Company with extensive operations in and around London. We carry out work at many of the Capital's rail aggregates terminals and are also involved with the supply chain for consumer goods into London through our work with Direct Rail Services on behalf of Stobart Rail and Tesco. Victa also supports a wide range of companies in developing their logistics strategy and operations so is thus well placed to comment on the New London Plan with regard to industrial and logistics land, particularly looking forward to a sustainable supply chain for London in the decades to come.

Policy E4 'Land for industry, logistics and services to support London's economic function' stating that provision should be made for 'land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure' is welcome, as is the statement 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'

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

This land use strategy is vital, as one of the best 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 train (possibly electrically-hauled in the future) to intermodal terminals on the edge of the city, such as 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 believe an 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.

It may also be possible for the air space above some intermodal terminals to 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 scope for other such applications along the main rail corridors into London. It would 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, and based on our experience, we would suggest that the following locations meet the criteria and should be identified for rail intermodal use:

1. Southall
2. Old Oak Common/Wormwood Scrubs
3. Greenford
4. Park Royal
5. Willesden Junction
6. Neasden
7. Cricklewood
8. Hornsey/Wood Green
9. Edmonton adj North Circular
10. Lea Valley, various sites from Leyton to Waltham Abbey
11. Bow/Stratford adj A102
12. Dagenham
13. Charlton adj Angerstein Wharf
14. Hither Green
15. Deptford

16. Clapham North/Nine Elms

17. Norwood/Selhurst

18. Tolworth

19. Feltham

20. South Acton/Gunnersbury

This is not a comprehensive list but gives an idea of the locations that should be identified for modal interchange and carry a presumption in favour of such use. They vary in size, capability and distance from central London but could all perform a crucial role in decarbonising and reducing emissions from freight and logistics across London.

Yours faithfully,



'To provide trained & empowered people to safely & efficiently deliver services that encourage sustainable growth & continuous improvement of our business & the railfreight sector in the UK'

Neil Sime
Managing Director
Office : 01622 690978 Fax : 01622 692096 Mobile : 07850 514000
email : neil.sime@victa-railfreight.com

The information in this e-mail and any files transmitted with it are confidential and may be legally privileged. It is intended solely for the stated addressee. Access to this e-mail by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful. If you have received this e-mail in error please notify Victa Railfreight Ltd on 01622 690978. Thank you.

This message has been scanned for viruses by the Greater London Authority.

Click [here](#) to report this email as spam.