

ORGANISATION	LONDON FIRST
ID	1588
MATTER	M63 FREIGHT, DELIVERIES AND SERVICING

M63. Would Policy T7, along with policies E4-E7, provide an effective strategic framework to ensure that suitable sites and infrastructure are provided for all types of freight, deliveries and servicing in an integrated and sustainable manner in all parts of London? In particular:

a) are all of the requirements of Policy T7 necessary to address the strategic priorities of London, or

1. London First strongly supports the overarching principle of forward planning for an efficient and sustainable freight network to support the commercial functions of the capital. However, Policy T7, as currently drafted and at over one page in length, represents another example of the draft Plan's inappropriate level of detail and prescriptiveness for a Spatial Development Strategy. For these reasons, we submit that Policy T7 fails the test set out in the Greater London Authority Act 1999 paragraph 334 (5), which states, "*The spatial development strategy must deal only with matters which are of strategic importance to Greater London*".
2. London First considers that T7 would be more effective if it focused on the strategic priorities for deliveries, servicing, and construction. The Mayor's Transport Strategy sets out specific targets in relation to each of these, and it is the responsibility of the Mayor and Transport for London (TfL) to take these forward, through means such as the forthcoming TfL Freight and Servicing Action Plan, rather than overly prescriptive *planning* policy in the Mayor's Spatial Development Strategy.
3. One such strategic priority is to ensure that T7 is intrinsically linked to Policies E4 to E7. Where reviews are undertaken of Strategic Industrial Locations (SIL), revisions to SIL boundaries that maintain industrial capacity, either through intensification of use or land swaps, should be explored where they provide the opportunity to enhance accessibility to rail and waterborne freight. Much of London's SIL land is based upon historic arrangements, which may not be the most sustainable solution to meet modern freight needs. London First supports the masterplanning approach to SIL set out in Policy E7, and it is submitted that

T7 should cross-reference to E7 to ensure that long-term sustainable freight solutions are planned for as part of the masterplanning process.

b) do they extend to detailed matters that would be more appropriately dealt with through local plans or neighbourhood plans?

1. As set out above Policy T7, as currently drafted, goes far beyond the remit of only dealing with matters which are of strategic importance to Greater London.
2. T7 includes detailed implementation matters that should be left to the boroughs in their transport strategies and Local Plans. For example, T7C should be reduced to include solely the opening sentence, which states, *“Development Plans should safeguard railheads unless it can be demonstrated that a railhead is no longer viable or capable of being made viable for rail-based freight-handling.”* The detailed criteria for assessing the viability of a railhead, which follow, do not need to be embedded within strategic planning policy and should therefore be deleted. T7E should also be deleted. It is not the purpose of T7 to set out the tests for the detailed assessments of planning applications.
3. Another example is the reference to Transport for London’s Fleet Operator Recognition Scheme (FORS) in the supporting text to T7 at paragraph 10.7.6 of the draft Plan. It is not the purpose of the planning system to manage issues such as FORS certification, which are legislated by alternative means.
4. As stated above, Policy T7 should provide strategic direction to the boroughs in terms of formulating their Local Plan policies, whilst allowing them the flexibility to tailor a sustainable freight strategy to their local needs and linked to their SIL masterplans to ensure a sustainable distribution of land uses and freight movement. It should cross-refer to the Mayor’s Transport Strategy, where appropriate, rather than replicate detail in the London Plan, which only seeks to overcomplicate and confuse the strategic planning themes. London First would support a more strategic approach.