CILT(UK) response to Transport for London's consultation on the West London Orbital Railway

18th November 2026

1. Introduction and summary of response

The Chartered Institute of Logistics and Transport (CILT(UK)) welcomes investment in London's transport network and recognises the potential benefits of improved passenger connectivity across west and north-west London, particularly for disadvantaged areas like Harlesden. However, these benefits must not be delivered at the expense of the strategic rail freight network on which London, the South-East and the wider UK economy depend.

CILT(UK) has significant concerns that the proposed West London Orbital (WLO) service has not adequately demonstrated how existing and future freight requirements will be protected alongside the introduction of additional passenger services. In particular, the proposals for Acton Wells Junction do not provide sufficient confidence that the additional passenger services can be accommodated without adversely affecting freight capacity, reliability and future growth.

The railway infrastructure in this area is not simply an underused passenger railway waiting to be brought back into service. It forms part of a nationally significant freight network serving ports, construction supply chains, international trade and major distribution facilities. Its strategic importance will increase as new freight facilities become operational, international rail freight grows and London's construction programme generates continuing demand for aggregates.

CILT(UK)'s position is that TfL should not progress the WLO's current proposals until it has demonstrated, through a robust and independently scrutinised railway capacity assessment, how both existing and future freight requirements will be accommodated. If this cannot be achieved, TfL must reconsider the scheme's infrastructure design and service specification.

2. Acton Wells Junction: a nationally significant freight constraint

Acton Wells Junction is a critical part of the rail network and already represents a significant constraint on railway operations. Its importance extends well beyond the immediate WLO corridor.

The junction facilitates freight movements connecting the west of England, London's ports and terminals, and destinations across the wider national rail network. Examples include:

- Construction aggregates from the Mendip quarries: limestone and other aggregate products move by rail from the West Country to serve construction markets, including London and the South-East.
- Marine dredged sand: supplies from the Thames and associated marine aggregate operations support the construction industry and depend on effective freight rail connections.

- Port-related freight: rail services moving containers and other goods between London's ports, terminals and inland markets depend on sufficient capacity through the London rail network.

These are essential supply chains. Rail freight provides a means of moving large volumes of goods with fewer lorry movements on the strategic road network, supporting economic activity while helping to reduce congestion, emissions and road maintenance impacts.

The WLO consultation identifies Acton Wells Junction as one of the biggest constraints on the proposed route. TfL proposes increasing the number of tracks from two to four and constructing a new bridge over the Central line to accommodate the additional tracks.

CILT(UK) is concerned that these proposals do not adequately resolve the underlying conflict between passenger and freight movements. Additional tracks do not mean that the junction will have sufficient usable capacity, suitable train paths or operational flexibility to accommodate the proposed passenger frequency and freight services.

The key issue is how trains will move through the junction in practice. Conflicting movements, crossing paths, signalling constraints and the need to recover from disruption can all reduce the effective capacity of a railway junction. These issues must be assessed as part of the complete network, rather than by considering individual track sections in isolation.

CILT(UK) is particularly concerned that a fully grade-separated solution may not be achievable within the physical constraints of the site. If grade separation is not feasible, TfL must demonstrate how an alternative engineering solution would remove or sufficiently mitigate the conflicting movements. The current proposal must not be treated as an adequate solution because additional tracks are proposed.

CILT(UKJ)'s position is that Acton Wells Junction is a fundamental constraint that must be resolved before the WLO service specification can be considered deliverable. TfL should work with Network Rail, freight operating companies, freight customers and relevant industry bodies, such as the Rail Freight Group, to identify a technically credible solution that protects the strategic function of the junction.

3. Old Oak Common: Future growth and competing railway requirements

Old Oak Common is expected to become a major transport interchange and a focus for development, employment, and housing growth. The WLO is intended to improve passenger connectivity to this area, but the associated infrastructure must also be considered in the context of its wider railway and freight functions.

CILT(UK) is concerned that the cumulative impacts of the proposed WLO, development at Old Oak Common and other changes to the railway network have not been sufficiently demonstrated in the consultation material.

The assessment must consider how additional passenger services will interact with existing freight movements, future demand from terminals and ports, and the operational requirements of the wider railway. It must also consider how disruption or changes to one part of the network could affect services elsewhere.

The introduction of new passenger services should not inadvertently constrain the ability of Old Oak Common and surrounding areas to support the movement of goods, construction materials and other freight traffic required by London's future development.

A whole network assessment is essential. Infrastructure investment and railway timetables should be planned together to support both passenger connectivity and the efficient movement of freight.

4. London Gateway Port and the growth of container freight

London Gateway is one of the UK's largest container ports and has an increasingly important role in international trade and the movement of goods to and from London and the wider UK.

Rail is an important component of the port's distribution system. Container trains connect the port with inland terminals and distribution markets, reducing reliance on road haulage for long-distance freight movements. The capacity of the railway network to accommodate these services is therefore integral to the port's wider economic and environmental contribution.

The implications extend beyond the immediate port area. Rail freight services must be accommodated across the wider London network, including the routes and junctions through which trains travel to reach their destinations.

CILT(UK) is concerned that the WLO proposals risk introducing additional passenger movements into a network that must also accommodate growing port-related freight demand. Any reduction in available freight paths, restrictions on operating times or deterioration in service reliability could constrain the ability of rail to support future container growth.

This would be counterproductive at a time when national transport policy seeks to increase the proportion of freight moved by rail and make better use of existing rail infrastructure.

TfL must therefore assess the WLO against realistic forecasts for London Gateway's rail freight demand, including the potential for additional services, changes in operating patterns and the network capacity needed to serve inland markets.

5. Barking Eurohub and international rail freight growth

The future development of Barking Eurohub reinforces the need for a strategic, forward-looking assessment of freight capacity across London.

Network Rail's plans for Barking Eurohub to become Britain's gateway for European rail freight include redevelopment as an international intermodal freight facility, supporting the growth of rail freight services through the Channel Tunnel. The development is intended to accommodate longer continental freight trains and increase the terminal's capacity.

These plans create an opportunity to expand international rail freight services between the UK and continental Europe. Freight arriving through the Channel Tunnel via HS1 could serve London and the South-East by rail, providing an alternative to road transport for suitable flows of containers and other intermodal traffic.

However, delivering these benefits requires more than investment in the terminal itself. The railway network must provide sufficient capacity for freight trains to reach the facility, connect with the wider network and operate reliably alongside passenger services.

As Barking Eurohub develops, demand for international rail freight paths is likely to increase. The planning assumptions used to assess the WLO must reflect this prospective growth, rather than treating today's freight volumes as a fixed ceiling.

CILT(UK) is concerned that developing new international freight capacity at Barking while simultaneously introducing additional passenger services elsewhere on the network, without a coordinated assessment of their combined effects, risks undermining the value of both investments.

TfL must work with Network Rail and the organisations responsible for Barking Eurohub to understand the anticipated service pattern, routing requirements, train lengths and future demand. These requirements must inform the WLO's infrastructure design and timetable.

6. Construction aggregates and housing delivery across London and the South-East

The WLO proposals must also be assessed against the scale of planned housing and infrastructure development across London and the South-East, particularly major construction programmes in South London.

These developments require substantial quantities of aggregates, including sand, gravel and limestone. Rail freight can transport these materials in bulk, reducing the number of heavy goods vehicles required to serve construction sites and supporting more sustainable construction supply chains.

The movement of aggregates is particularly sensitive to railway capacity and operating constraints. Freight trains must be able to travel from production and marine aggregate facilities to suitable terminals and unloading locations, often within defined operating windows. The reliability of these services is important to maintaining construction schedules and controlling costs.

If additional passenger services reduce the availability or flexibility of freight paths, the consequences could extend beyond the immediate WLO corridor. They could affect the ability to supply construction materials to major development areas, increase pressure on road haulage and undermine efforts to manage congestion and emissions in urban areas.

The WLO should therefore be assessed against forecast construction demand and the freight capacity required to support London's housing and infrastructure programme. This assessment should include aggregate flows from the Mendip quarries and marine-dredged sources, alongside other significant freight movements.

It would be short sighted to facilitate new passenger journeys while inadvertently restricting the movement of materials required to deliver the housing and infrastructure that London needs.

7. The need for a comprehensive freight capacity assessment

CILT(UK) considers that the current consultation has not provided sufficient evidence to demonstrate that the proposed WLO service can be accommodated without unacceptable consequences for existing and future freight operations.

Before proceeding further, TfL should commission and publish a comprehensive capacity and operational assessment, undertaken jointly with Network Rail and informed by freight operators and customers.

8. CILT(UK)'s recommendations

CILT(UK) recommends that TfL:

1. Pause further development of the current WLO infrastructure proposals until the impact on existing and future freight services has been properly assessed.

2. Treat Acton Wells Junction as a strategic freight constraint requiring a robust engineering solution, rather than assuming that additional tracks alone will resolve the problem.
3. Work with Network Rail and the passenger and freight sectors to develop and test alternative infrastructure and timetable options.
4. Incorporate the planned development of Barking Eurohub, forecast growth in London Gateway rail freight and the requirements of London's construction supply chains into the scheme's demand and capacity modelling.
5. Publish the evidence demonstrating how existing freight services, future freight growth and disruption resilience would be protected.
6. Reconsider the proposed service specification, infrastructure design or alignment if the necessary freight capacity cannot be delivered.

9. Conclusion

CILT(UK) recognises the potential value of improved passenger connectivity across west London, particularly for disadvantaged areas like Harlesden. However, a new passenger service cannot be considered in isolation from the existing railway network and its nationally significant freight function.

Acton Wells Junction is a critical constraint. The proposed introduction of additional passenger services, combined with future growth at London Gateway, the development of Barking Eurohub. International rail freight through the Channel Tunnel and – crucially - the continuing need to supply construction aggregates to London and the South-East, creates a compelling case for a much more comprehensive assessment of the scheme.

The current proposals have not demonstrated that these competing requirements can be accommodated satisfactorily. In particular, the proposed track additions do not, on their own, resolve CILT(UK)'s concerns about junction conflicts, effective capacity and the long-term ability of the railway to support freight growth.

CILT(UK) therefore considers that the WLO proposals, in their current form, are not sufficiently developed to demonstrate that they can be delivered without unacceptable consequences for rail freight.

TfL must return to the engineering and operational problem, work collaboratively with Network Rail and the freight sector, and develop a solution that protects both passenger and freight objectives. If a technically credible solution cannot be identified with the current scheme, TfL must reconsider its proposals, rather than proceed on the assumption that the freight network can accommodate the additional services.

The objective should be a railway that supports London's passenger needs while retaining the capacity to move goods efficiently, supply construction materials, serve ports and terminals, facilitate international trade and deliver the wider economic and environmental benefits of rail freight.

CILT(UK) would welcome further engagement with TfL and Network Rail to help identify a workable solution that recognises the strategic importance of rail freight to London and the UK economy.

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