

London Plan Guidance: Industrial Land and Uses Consultation

Submission by the Chartered Institute of Logistics and Transport UK

The Chartered Institute of Logistics and Transport UK (CILT) is a non-political institute that provides insight into pivotal decisions and policies. Our responses emanate from the extensive collective knowledge and expertise of industry experts from CILT's members and focus on delivering prosperity for the United Kingdom. We would be very happy for you to engage with us if there are any answers to your questions that you may wish to develop.

Response:

We welcome the opportunity to contribute to the debate on Industrial Land in London, as we have done on previous occasions.

Whilst we regret the loss of industrial land in London, we appreciate the need for additional housing in the capital and the pressure from the Secretary of State to use brownfield land for this purpose. We support intensification and co-location as ways of making better use of a reduced industrial land footprint and consider there is significant scope for this, particularly with micro logistics hubs for efficient, sustainable final delivery to private and business addresses across central London.

However, we are concerned that all Industrial Land appears to be treated in the same way and are clear that there needs to be a distinction between different types of industrial use. In particular, we would draw a distinction between uses which are necessarily locationally constrained and those which are not. The former are essentially activities that need to be, or would benefit greatly from being, alongside the main rail routes into the capital and/or along the Thames.

Most obviously, these include terminals for importing aggregates into London and associated processing activity, such as ready mix concrete manufacture, which has to be located close to the point of use. It also includes the converse movement of domestic and commercial waste materials out of the capital, notably construction and building waste and, increasingly, scrap metal for use in electric arc steel production in South Wales and the North East.

As well as these bulk materials, there is considerable potential for sustainable delivery of consumer goods into London, which is critical to its citizens' quality of life. This will most likely be in small (20'/6m) intermodal units, loaded at rail-connected distribution centres in the Midlands and conveyed by electric train to compact suburban modal transfer points, where they would be transferred to small electric lorries for final delivery to stores and micro logistics hubs in the city. We would not see warehousing being a critical component of such sites, although there is scope for intensification and co-location as discussed below.

Clearly, such intermodal and bulk terminals have - by definition - to be located along main rail lines, or the river, at points where there is reasonable road access for onward delivery. We consider that

such locations should be classed and treated differently from the generality of brownfield sites, since they are unique and vital for the creation of sustainable supply chains into and out of London. In the absence of such supply chain innovation there is no credible alternative to continuing with existing HGV-based transport operations, with the associated emissions, congestion, hazard for cyclists/pedestrians and visual intrusion.

We strongly advocate intensive use of such critical sites - the air space above the rail terminal can be used for related logistics activity or unrelated light industrial/service activity. An excellent example of what can be achieved in this regard can be seen just outside Paddington, where the Ladbroke Grove bus garage is located above an aggregates terminal/concrete plant. Paris has shown how a rail connected intermodal logistics facility can be located below other urban activities.

It is not difficult to conceive a sequential land use strategy, where a bus garage or builders merchant is relocated to the air space above a rail terminal and the sites they previously occupied are released for (high density) residential development. Social, economic, environmental, health and political imperatives could all be achieved by such a strategy.

We have compiled a list of critical sites around London for intermodal facilities and would be happy to share this with the GLA Industrial Land planning team, along with discussing the proposed strategy further.'

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