London Plan – Air Quality Neutral Guidance

25 February 2022

About Logistics UK

Logistics UK is one of the UK's largest business groups and the only one providing a voice for the entirety of the UK's logistics sector. Our role, on behalf of over 19,000 members, is to enhance the safety, efficiency and sustainability of freight movement throughout the supply chain, across all transport modes. Logistics UK members operate over 200,000 goods vehicles - almost half the UK fleet - and some one million liveried vans. In addition, they consign over 90 per cent of the freight moved by rail and over 70 per cent of sea and air freight.

Logistics UK has only recently been made aware of the London Plan consultation on Air Quality Neutral (AQN) guidance which closes on 27 February 2022. The draft guidance creates some potentially significant issues for the logistics/industrial sector in London. We have been granted an extension to the consultation deadline to provide a fuller, more considered submission. This is a holding response to register our concerns with the proposals. In the meantime, we propose that an extraordinary meeting of the Industrial and Logistics Sounding Board is held to present the draft guidance to members and obtain feedback which can contribute to the consultation process.

The draft guidance applies a benchmark trip rate to new B2 and B8 developments. Whilst it does not include trips generated by deliveries and servicing or by heavy vehicle movements, it does set a benchmark for cars and light van movements likely to be generated by customers or employees. We would like to see the evidence base supporting the benchmark trip rates for B8 (industrial, storage and distribution developments), as we have concerns that these rates would not allow for the reasonable operation of these land uses. This would significantly impact on warehousing, which is often located in areas poorly served by public transport and where employees' shifts may not fit with the operating hours of public transport provision.

Whilst the principle of 'no net loss of industrial and logistics land' was directed to be removed from the London Plan by the previous Secretary of State, this should remain an ambition for the next London Plan. In the meantime, Supplementary Planning Guidance should not create policies which discourage the development of distribution and warehousing development. Ensuring logistics land is provided in the right strategic locations to serve the capital is essential for efficient logistics and to enable the industry to achieve Net Zero.

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