London Plan – consultation on draft Air Quality Neutral guidance

25 March 2022

Summary

- Logistics UK is concerned that the Benchmark Trip Rate (BTR) for B8 (storage and distribution) underestimates the required number of trips by employees. Logistics sites and designations/allocations are often located in areas which are poorly served by public transport and where employees' shifts may not fit with the operating hours of any public transport provision.
- The BTR for B8 uses in both inner and outer London are challenging. This is likely to push B8 developments out of London, increasing stem mileage for onward deliveries into central London and as a result potentially increasing the number of van movements as productivity is reduced.
- Due to the relatively low BTR for B8, compared to other land uses, it is unlikely that AQN will be achieved by mitigation. Therefore, logistics developments are likely to face significant offsetting charges.

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.

About the consultation

Logistics UK was only made aware of the London Plan consultation on Air Quality Neutral (AQN) guidance shortly before the consultation closed on 27 February 2022. We were disappointed by the lack of engagement with the logistics industry as the draft guidance creates some potentially significant issues for the logistics/industrial sector in London. Without thorough analysis of the draft guidance, the implications it may have on the provision of industrial and logistics land in the capital is unclear, therefore the consultation was missed by many large logistics operators with dedicated expertise for monitoring these initiatives. The Greater London Authority (GLA) is a member of the core group of the London Industrial and Logistics Sounding Board (ILSB) whose remit is to engage with the logistics industry and industrial/logistics landowners and developers. It was particularly disappointing, given that this forum exists, that that there was no specific engagement with the ILSB and that the group was not notified nor indeed specifically consulted with about this guidance.

Logistics UK submitted a holding response to the consultation ahead of the 27 February 2022 deadline and thanks the GLA for granting a four-week extension to enable us to provide a fuller, more considered submission. This extension has been crucial to enable us to obtain feedback from our members to inform our response.

Whist the consultation seeks views on various aspects of the AQN Guidance, including building emissions, Logistics UK's submission will focus solely on section 3 - Transport Emissions Benchmark (TEB).

Response to consultation

Logistics UK seeks to ensure that our industry can continue to supply businesses and consumers with the goods they require every day whilst reducing any social impacts – including carbon dioxide (CO_2) emissions and air pollution. The logistics industry wishes to play a positive role in helping reduce emissions. To achieve this, Logistics needs a planning system that supports green growth. 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 sites. 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.

1. To what extent do you agree or disagree with the methodology set out for meeting the Transport Emissions Benchmark?

The draft guidance applies a Benchmark Trip Rate (BTR) to new B2 (industrial) and B8 (storage and distribution) 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 and is therefore likely to heavily impact on viability of developments. The benchmarks are challenging for B2 and extremely challenging for B8 developments to be Air Quality Neutral.

Logistics UK believes the B2 and B8 trips data should be reviewed. We would like to see the evidence base supporting the BTR for B8, as we have concerns that these rates would not allow for the reasonable operation of these land uses. This would significantly impact on warehousing. It is important for the guidance to reflect that these buildings operate 24-hours a day and are often located in areas which are poorly served by public transport and where employees' shifts may not fit with the operating hours of any public transport provision. For B8 uses, there is no BTR for the Central Activities Zone (CAZ), an allowance of up to 1.4 trips per year/m^2 for inner London and 5.8 trips per year m/^{2} for outer London. This compares to 3.9 and 16.3 respectively for inner and outer London for B2 (industrial land).

The BTR for B8 in both inner and outer London are challenging and doesn't include trips from customers who may drive to collect parcels. This is likely to push B8 developments out of London, increasing stem mileage for onward deliveries into central London and as a result potentially increasing the number of van movements as productivity is reduced. The guidance provides a much more generous allowance for private vehicle trips by customers in retail, hot food takeaway and leisure rather than by staff for employment uses, in logistics, industrial or office.

One parcels company has recently opened a new distribution site in inner London. It is poorly served by public transport and if the inner London BTR of just 1.4 trips per year/m^2 were applied, it would only allow for trips for around a quarter of employees. If customers using it as a collection point were also included, the BTR would only fulfil a fifth of potential trips.

Due to the relatively low BTR for B8, compared to other land uses, it is unlikely that AQN will be achieved by mitigation. Therefore, logistics developments are likely to face significant offsetting charges. This is further compounded by the fact that London is adopting a 30-year period, with a 2% annual uplift, compared to a standard term of 10-years where planning authorities apply this process outside of the capital. With the UK ending the sale of new petrol and diesel cars and vans by 2030, today's TEB may not be an appropriate baseline going forward. Logistics UK would like to understand the rationale for this approach, given the Mayor's appreciation of the need to safeguard industrial and logistics land in the capital and what the revenues raised in offsetting charges will be used for.

2. Do you have any additional comments on the Transport Emissions Benchmark, including the use of TRICS data to calculate the new proposed benchmarks?

The BTRs are based on data from TRAVL (Trip Rate Assessment Valid for London) and are defined for different land uses and different areas of London. However, this provides a generic zoning system (CAZ, inner and outer London) rather than the suitability or sustainability of a location.

3. ***If you disagree with the use of TRICS data, please specify what data the Transport Emissions Benchmarks should be based on?***

Logistics UK thinks that the Public Transport Accessibility Level (PTAL) may be more appropriate for setting BTRs as it is a measure which rates locations by distance from frequent public transport services. The GLA could also review recent B2 and B8 developments to obtain actual trip numbers to help inform the benchmark.

Areas where further clarity is required

- One-way trips vs two-way trips are not explicitly determined within the guidance. An employee going to work would require a two-way trip.
- There is no detail within the guidance explaining how mitigations can achieve AQN. This is left to the discretion of Environmental Health Officers.
- Section 4.1.5 of the draft guidance states that' *the TEB only estimates car or light van trips generated by the development occupiers. These trips are likely to be generated by residents, customers or employees. The TEB*

does not include trips generated by deliveries and servicing, taxis or heavy vehicle movements from non-occupiers. Assessment of these trips should be captured in the wider air quality impact assessment where one is required.' This section must be strengthened to clarify that *all* trips generated by deliveries and servicing, taxis or heavy vehicle movements from non-occupiers *and occupiers* are not included in the TEB. Where the site is used for distribution, this could lead to local interpretation of the rules and bring delivery vehicles based at the site into scope of the TEB.

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