



Executive summary

About The United Kingdom Warehousing Association (UKWA)

UKWA is Britain's leading trade organisation for the logistics sector, with more than 650 members.

UKWA members include warehousing and logistics providers as well as manufacturers, retailers, wholesalers and suppliers to the logistics industry.

Our mission

- protect and advance the interests of members
- support business development
- promote industry best practice

Special research commissioned in 2016 - Feeding London 2030 – Facing the logistical challenge

Commissioned by UKWA and delivered by research specialists Global 78, Feeding London 2030 has been hailed by industry leaders as a timely and valuable source of data for all stakeholders in the food & beverage and food service supply chains. Challenges it examines in detail include:

- Increasingly congested urban environment.
- New consumer demands for food and drink.
- Demand for delivery frequencies, times and volumes.
- Changing Grocery Retail sector including convenience stores and home delivery.
- Hospitality and Food Service (Catering) sector scale, locations and unique demands.
- High dependency on vans in delivery vehicle fleets.
- Maintaining food hygiene and food safety.
- Handling food waste and other waste streams.

UKWA response to the London DMTS 2017



Introduction

The UKWA welcomes the publication of the London Mayor's Draft Transport Strategy and its objective. However, after careful reviewing our members have some areas of concern. There is insufficient detail and little about the resources required to implement the plan. Without significant amendments UKWA consider that there are real risks of unintended consequences that will inhibit rather than enhance London's economic growth and quality of life. Our comments are made in a positive and constructive way to help refine the MTS into a strategy that works for all Londoners. As the professional body representing the 3PLs and the warehousing and distribution sectors it is our duty to point out the issues as we see them and offer constructive input which we hope will contribute to achieving the Mayor's objectives wherever practical.

UKWA supports much of the Mayor's transport vision in general terms. We are however concerned that the transport networks, despite substantial investment, will struggle to keep up with the challenges posed by growth.

The DMTS gives insufficient consideration to the impact of policies on the efficient delivery of essential goods and services and there are some significant inconsistencies between proposals. There is no coherent policy to address the increased demand for freight supplies as the London population increases. London needs a freight strategy and this is not obvious in the DMTS, the movement of goods around a city enables the supply chain to function for a multitude of sectors and is therefore integral to London's "productivity" as a city and its success on the world stage.

UKWA is extremely concerned that there is a failure to adequately integrate freight transport policies with land use planning. The London Mayor's powers mean he is well placed to facilitate this connection which is vital for our members.

Freight demand is not just driven by population growth, but also by the change in consumer buying habits. Today, the UK already has the largest e-commerce sector in Europe. Estimated to be equivalent to £60 billion and 17% of total retail trade in 2016. This sector grew by 16% in 2015 and is projected to continue growing as the country becomes more digitally enabled.



UKWA does not believe it reasonable or realistic for operators to comply with the ULEZ and a direct vision standard at this time given the level of investment required from operators and the lead times from manufacturers for the delivery of new vehicles. UKWA does support the introduction of higher standards by the industry but until the standard is set and manufacturers are ready, we emphasise that the focus should be on behaviour change and education.

The focus on controlling freight vehicle movement rather than efficient supply chains creates economic and supply risks

Whilst we appreciate that freight is part of the overall transport system we do not believe enough consideration has been given to logistics and supply chains and a comprehensive freight strategy doesn't seem to be behind the proposals. The policies are focused almost exclusively on prescribing the type of vehicle used to move goods, the amount of vehicles on the road and the timing of deliveries, rather than facilitating an efficient logistics and supply chain network. This approach fails to capture a collaborative approach working with the freight and logistics sectors to facilitate London's prosperity and may indeed result in unintended consequences, potentially including higher traffic volumes, higher costs, risk shortages of essential commodities and will constraint economic growth of London.

The DMTS proposes a 10% reduction in morning peak road freight (van and lorry) traffic by 2026 with a view to reducing congestion. There doesn't seem to be an understanding of how the freight sector operates developing solutions continuously to respond to the requirements of the businesses and residents the industry supplies both in timing of deliveries and efficient cost. The traditional definitions of the logistics sector and freight fail to capture all logistics activity today. In addition, such a reduction is significantly greater than any achieved by a range of successful initiatives in recent years. The goals are unrealistic against the background of increasing demand for goods and services as the population grows and there doesn't seem to be in the proposal an allowance for the increase that will occur as the population rises. It is estimated that households spend an average of £5,000 on furnishing and decorating supplies to 'make a house feel like a home' when they move. So as London continues to deliver new homes to provide places to live for the growing population, so too will it need to provide a logistics response to furnishing those homes – moving products from warehouses and distribution centres to housing developments across the capital.

One of the headline solutions proposed is that many freight journeys could be eliminated by consolidation centres. Whilst these can have a significant impact they 'one of a number of solution. The proposal does not reflect the fact that freight is not one entity but encompasses a vast and diverse amount of vehicles and consumer and sectoral requirements. Vehicles are not often interchangeable between functions and sectors served. In addition, the major retailers and some areas i.e. Regent Street are already consolidating as far as practical before entering London where it makes business sense.



A key lesson TfL seems to be overlooking is the success of the Olympics when it finally started to engage with and work with everyone involved in the freight sector, from operators of local service vehicles to distributors of goods to transporters of bulk cargo. It is in all interests to design effective logistic and supply chain solutions that keep the city supplied and also contribute to wider social and economic objectives. Resurrecting this is not in the DMTS and in fact we are seeing the freight sector becoming more marginalised within TfL since the new restructuring.

The proposal to shift freight to river transport does not include arrangements to safeguard wharves or for bespoke docking requirements. Nor does it include any assessment of whether local roads are adequate for moving freight from the river to destination, or consider the restrictions of the London Lorry Control Scheme. Strong support from the Mayor, particularly protecting landing sites and access inland in an environment of highly competitive land prices and an adversarial planning system, will be essential to realising this proposal. There is no such commitment from the Mayor in the DMTS.

The proposal to shift freight from road to rail does not include any assessment of the railways' ability to manage the variety loads distributed within London, or consider whether there are potential rail heads adequate for transfer of goods to road for the 'last mile'. There are also policies which conflict, notably restricting rail freight at night. With rail freight movements in the capital largely bound for destinations outside London, any restriction would have a very severe impact on national logistics and distribution chains. The alternative proposed in the DMTS of freight being routed around London would require upgrades to the route to Nuneaton in the Midlands which are unfunded and we don't believe support by the DfT Also this risks harm to the success of the London ports of the London Gateway and Tilbury which could drive more freight to their rival ports on the south and east coasts adding to more road base journeys coming into London.

Furthermore, land use proposals to replace distribution space with housing, alongside plans for the pedestrianised high streets, will lead to further restrictions on freight deliveries and with the pressure to give more priority to walking and cycling will alter the nature of the freight deliveries in London completely and this has not been accounted for. There is a clear risk that it will lead to freight traffic fragmenting rather than consolidating and greater additional business costs making London even dearer to do operate in.



UKWA believes there must be an alternative perspective on freight movement than the current one, where greater emphasis is placed on delivering benefits by maximising the efficiency of supply chains.

These could include:

- Prioritising industrial land use in the London Plan
- Considering the case for permitting zero emission electric freight vehicle to share bus priorities informed by detailed analysis of the freight movements and their purpose
- Investigating the use of off-peak capacity at passenger railway stations to move handling units such as roll cages or totes on trolleys
- Safeguarding existing freight facilities
- Examining a permit scheme to allow for better management of kerb space for deliveries as part of controlled parking zones
- Much better and collaborative engagement with the freight and logistic operators to find solutions – building on lessons from the London Olympics more carrots and less stick.

Congestion Charging and changing behaviour

A consistent temporal pattern across all cordons suggests that freight operators lack discretion to shift trip times to avoid the congestion charge, as their schedule is driven by customer needs. Drivers of HGVs 3.5 tonnes and above are subject to drivers' hours restrictions meaning they must leave central London to take a break unless they have a place to park. LGVs may show a different pattern because they are less constrained in this regard.

Inbound light goods traffic peaked at 7:00, when the congestion charge starts, meaning many were not able to avoid the charge. Many of these vehicles, especially vans, are likely operated by small business tradespeople (e.g. electricians, plumbers, and builders) whose working hours match those of peak-hour commuters. LGVs (vans) are often parked at residential addresses overnight and used for commuting to work and home.

Based on the data available, it cannot be concluded that operators responded to the CCZ by re-timing trips. This aligns with other research showing that pricing has little influence on freight trip timing, because delivery/pickup times are set by the customer. A recent survey of freight operators found that 69% reported they cannot change their schedule due to customer requirements [16]. Among operators that have been able to shift deliveries to night hours, the CCZ is not likely the driver of change. Large



retail operators with staff working during the night (e.g. Sainsbury, John Lewis) are most able to take advantage of these benefits of out of hours deliveries, and best able to avoid the congestion charge, because their sites receive full vehicle loads and are subject to dedicated logistics operations.

UKWA would welcome a more holistic, dynamic, demand-based charging system that helps change behaviour but also supports the competitiveness of businesses serving London, we need to keep London open for business.

In Conclusion

The Draft Mayor's Transport Strategy sets commendable objectives. However, we believe that a number of important proposals lack sufficient levers to contribute fully to the key targets set and that in some cases the approach should be totally reconsidered.

The conflicts between a number of policies raise issues over whether they can be implemented effectively especially freight on rail and water. We are concerned as to whether the potential consequences of some proposals have been fully thought through and whether some of the ambitious targets are realistic or even desirable if they involve unacceptable trade-offs being made.

UKWA believes the final strategy should reflect the principles of a **complementary transport system where the needs of all that support London's economy are taken into account** especially that the freight and logistics sectors are better recognised and the is proactive measures taken to protect and secure the relevant industrial land needed to make the DMTS happen. Urban logistics in London is a dynamic, growing sector that provides critical support for a wide variety of other sectors that are important to London's economic performance and ultimately competitiveness.

Something else that has been overlooked in the DMTS is **the employment that the freight sector brings to London**. 76,100 people are employed in the sector in London and this grew by 6,800 employees between 2011 and 2014. These activities are carried out by 6,105 businesses in London. However this figure does not include retail companies which operate their own urban logistics activities.

So damaging the logistics sectors also puts at risk employment:

UKWA response to the London DMTS 2017



- Road freight has the most businesses – supporting 2,555 businesses and 7,300 jobs
- Warehousing and storage has a smaller number of businesses but has a high ratio of jobs per business – 365 businesses and 12,900 jobs,
- Other transportation support activities has the second largest number of employees of the sub-sector – 1,075 businesses and 15,600 jobs
- Postal and courier services have the most employees of the sub-sector – 1,720 businesses and 32,800 employees.

Greater activity in the housing market also drives capital expenditure on dwellings (for example it is estimated that households spend an average of £5,000 on furnishing and decorating supplies to ‘make a house feel like a home’ when they move in). So as London continues to deliver new homes to provide places to live for the growing population, so too will it need to provide a logistics and supply chain response to furnishing those homes – moving products from warehouses and distribution centres to housing developments across the capital.

Reducing Freight Movements

Vehicle kilometres travelled (VKT) could be more effectively reduced by encouraging spatial efficiencies that reduce and shorten trips through London by looking at the location of logistics centres. Logistic companies would prefer to bring freight into central London in bulk with large vehicles at night and then deploy small vehicles for short trips, preferably electric vehicles. Such bundling and centralisation would reduce the number of LGVs on roads throughout London during peak hours and also VKT and emissions from those vehicles. The constraint that operators face in this context is availability of suitable warehouse space in central locations where land values are very high. Freight depot locations are determined mainly by land market values and local planning permission. In most urban areas, as land values rise in the centre, industrial uses are pushed further and further out. Over the period 1998-2008, warehouse floor space was rapidly disappearing in most Inner London boroughs, especially those partly within the CCZ (e.g. 82% in the City of London, 51% in Westminster). Meanwhile, warehouse growth was strong in many Outer London boroughs (e.g. 34% in Enfield, 21% in Havering). Policies protecting some central urban locations for logistics might be more effective than pricing in reducing VKT. For instance, if a company with a fleet of 100 vehicles relocated from a central location to a suburban depot 10 kilometres away, that could add up to 500,000 extra annual VKT (assuming 20 round-trip kilometres x 100 vehicles x 250 working days). Allowing freight depots to be continuously pushed to the periphery of the urban area works against sustainability and VKT reduction policies.



Responses to proposals

Proposal 2

The Mayor, through TfL, will work with the central London boroughs to transform the experience of the walking and cycling environment in central London by reducing the dominance of vehicular traffic, including by transforming Oxford Street and looking urgently at changes to Parliament Square.

The Mayor has expressed the aim to reduce am peak road freight by 10% by 2041. Reductions in am peak road freight of this order were achieved during the London 2012 Olympics and Paralympics but this was for a relatively short, defined period of time and was supported with substantial awareness raising and training resources, together with relaxations of existing time restrictions on specific buildings by local authorities. To achieve reductions in am peak freight traffic on the scale here on an on-going basis will require the allocation of significant efforts and resources, the long-term support of London's boroughs, changes to existing delivery time restrictions imposed on buildings and kerbsides and innovations and uptake in urban freight operations and technology.

Given that the reason for such a reduction in am peak road traffic is to improve the experience of the walking and cycling environment, consideration should also be given to facilitate the greatest use possible of these modes for freight transport, particularly last mile deliveries.

Proposal 3

The Mayor, through TfL and the boroughs, will deliver a London wide network of cycle routes, with new routes and improved infrastructure to tackle barriers to cycling. The Mayor's aim is for 70 per cent of Londoners to live within 400 metres of a high-quality, safe cycle route by 2041.

The planning and design of an extended network of cycle routes should take account of the freight transport needs of businesses and residents located on these cycle routes from the outset, to avoid unintended negative operational impacts on these operations that are vital to London's economy and the smooth functioning of London's businesses. Lessons can be learned in this respect from the cycle routes already implemented and the consequences of not considering freight transport



impacts early on in this process.

Without such consideration at the outset of new cycle route planning, those businesses and residents located on these routes are liable to experience deterioration in the provision of goods and services to them and the personnel providing these goods and services are liable to experience inconvenience and delay. It is important to find suitable compromises between the need for cycle routes and the freight transport requirements of these locations from the outset of such schemes to avoid unnecessary inconvenience and service interference.

This planning is especially important in the case of goods and service transport that involves the delivery of heavy, bulky goods and the provision of services that require the use of heavy equipment, tools and parts.

As explained above freight transport has important but often overlooked walking and cycling components. All goods and service transport requires the driver / service provider to carry out the last stage of their journey on foot.

In the case of heavy, bulky products the driver will aim to minimise this distance as much as possible by parking the vehicle as close to the point of delivery as possible. But in the case of lighter, smaller freight such as parcels, and service tasks, the driver/provider will typically cover substantial distances on foot in London (8 km/day for the average parcel carrier). The Mayor's efforts to ease and improve walking and cycling in London should therefore take account of the walking and cycling needs of goods and service transport.

Proposal 5

The Mayor, through TfL and the boroughs, will make it easier for people to walk and cycle in London by:

- a) Maintaining, expanding and improving 'Legible London' pedestrian wayfinding maps and ensuring that on-street cycle network signage is clear and consistent.
- b) Using new data to develop and improve online journey planning and navigation tools that will make walking and cycling trips the most easy journeys to plan.



Proposal 15

The Mayor, through TfL and the boroughs, will work with business and the freight industry to improve the efficiency and safety of freight and servicing in London by:

- a) Developing tailored and targeted approaches to address the unique challenges faced by the individual sectors such as food and construction deliveries.
- b) Planning a strategic consolidation and distribution network, including a review of funding requirements, and protecting industrial land through the London Plan.
- c) Encouraging London's businesses, starting with

Business Improvement Districts, to work together to use their procurement power to reduce or re-time their deliveries and servicing trips to avoid traffic congestion.

- d) Ensuring that all London is within a 30-minute drive of a construction consolidation centre and encouraging their use through Construction Logistics Plans and the planning process.
- e) Encouraging businesses in central London to ban personal deliveries, and extending the network of collection points in order to reduce the overall number of work place personal deliveries.
- f) Working with Business Improvement Districts to promote waste and recycling consolidation, using the waste consolidation toolkit.
- g) Developing a 'London lorry standard' to simplify the regulatory environment for HGVs operating in London

The Mayor should continue and build on the existing efforts by TfL to improve the efficiency of freight transport operations in London. This includes continuing to pursue existing consolidation and retiming work with freight operators, shippers and receivers wherever practicable and work to bring about cleaner and safer goods vehicles and vehicle operations in London in conjunction with operators using carrots not sticks. It should also involve continuing to identify and implement suitable freight routeing solutions, provide adequate freight infrastructure (at the kerbside, off-street and in terms of drivers' rest areas) and seek opportunities for modal shift for operational support, technology development, and infrastructure improvements. A key area that requires far more attention than in the past is the issue of land use and freight transport, and the role it can play in helping to achieve efficient, sustainable freight transport operations – this ranges from strategic design-making and safeguarding of logistics land in London that can help to reduce vehicle mileages and hence freight activity becoming ever-more intensive, through to the provision of appropriate road freight infrastructure on the road and at the kerbside that helps meet the demand as efficiently and sustainably as possible, through to improving freight trip generation assessment capabilities in TfL and the boroughs.

Consolidation can be achieved in many different ways and at many different locations in the urban supply chain. There is a hierarchy of consolidation facilities based on different urban locations that can serve different types of goods flows. These locations can be used to support a variety of different consolidation approaches including: Urban Consolidation Centres, micro-consolidation centres and mobile depots, kerbside



consolidation using portering systems and internal logistics/concierge systems and collective procurement to achieve consolidation in large multi-tenanted buildings. In addition, through operational collaboration, freight transport operators are already facilitating goods consolidation upstream in their supply chains so as to reduce vehicle trip generation prior to its last-leg despatch to/within the urban area. Much consolidation of goods already takes place in freight operations.

The reduction of on-site storage space in retail stores and offices over time, as a result of rising land values, has led to smaller, more frequent deliveries and thereby more intensive freight transport systems. Other factors that have resulted in less sustainable freight transport systems in London include the relative price of freight transport compared to other logistics costs, together with the under-pricing of delivery services by ecommerce retailers in their effort to gain market share (with many offering 'free' delivery), resulting in the imposition of external costs on the road network, society and environment.

Consumers' desire for the ever-faster response times offered by ecommerce retailers is also leading to a rapid growth in less sustainable freight transport.

The lack of availability and affordability of logistics land in London, especially in central and inner urban areas, is also leading to a reduction in the sustainability of some freight transport operations. The Mayor should take urgent steps to investigate these sources of freight transport intensification that threaten to undo good work carried out to improve freight sustainability, and



then take appropriate action to limit their impact and growth.

The Mayor's Draft Transport Strategy makes no reference to the potential concept of the Mayor/TfL to creating a new post for a Freight Commissioner for London. This role we believe is vital necessary to deliver the required (and growing) quantity of goods and services that will be required by business and households in London.

Proposal 15 also states the Mayor's ambition to reduce the number of personal deliveries to workplaces. However UKWA are unaware of the necessary research having been carried out to demonstrate that this is definitely the most sustainable and efficient solution to the problem of online shopping. There is a need to study the range of ecommerce delivery systems (to home, to locker bank, to collection point, and where these should be located – near home or work – and to workplace either direct or to nominated carrier for final movement in a consolidated load) before it is possible to determine the best solution.

Policy 19

The Mayor, through TfL and the boroughs, will ensure that new homes and jobs in London are delivered in line with the transport principles of 'good growth' for current and future Londoners by using transport to:

- a) create high-density, mixed-use places, and
- b) unlock growth potential in underdeveloped parts of the city.

It is necessary that the Mayor and TfL gain a better understanding of freight vehicle trip generation rates associated with different land uses and business types in order to gain insight into suitable forms of mixed use development, and to ensure that in mixed use developments the need for goods vehicle activity is adequately allowed for and protected (i.e. vehicle numbers and timing of vehicle activities). We urge the Mayor, through TfL to work with logistics providers to better understand freight activity through this method going forward.



Proposal 77

The Mayor, through TfL and the boroughs, will seek to ensure that delivery and servicing plans facilitate off-peak deliveries using quiet technology, and the use of more sustainable modes of delivery, including cargo bikes and electric vehicles where practicable. Large-scale developments and area-wide plans should include a local consolidation strategy (consisting of measures such as shared procurement for consumables, coordinated waste and recycling collection, timetabled deliveries, 'click and collect' for residents and flexible loading bays). TfL will work with boroughs and other stakeholders to pilot ambitious plans in Opportunity Areas and around major developments such as High Speed Two (HS2) to reduce the impact of construction and freight-related trips.

In the case of the Mayor's proposal of achieving off-peak retiming of freight transport operations, this will need to be considered carefully in relation to mixed use developments with a residential component.

As pointed out above, improved knowledge and information concerning freight vehicle trip generation is essential to the Mayor for both planning decisions concerning individual sites and major brownfield development areas. Such insight would ensure that the freight vehicle trip generation associated with such developments can be accommodated by the local road network and also that the off-street freight facilities required to accommodate the freight trip generation associated with these sites is designed into these new sites and developments.

Delivery and Servicing Plans have an important role to play in helping to bring about more sustainable and efficient freight transport operations but will require more effective monitoring and enforcement actions and powers than they have at present if this is to be achieved – and this has both resource implications and planning power/punitive power requirements.

Although the Mayor has a stated aim to retime some am peak road freight traffic, there is currently much pressure for rapid replenishment. In order to achieve his retiming aspirations, the Mayor needs to obtain greater understanding of the necessity of lead time requirements for goods. The level of freight transport retiming that was achieved during the London 2012 Olympics and Paralympics will be difficult to repeat again without relaxation of some existing regulations, and co-operation of boroughs and freight and supply chain



partners and possibly compulsion.

Proposal 91

The Mayor, through TfL, will consider when surplus transport land becomes available, its accessibility to the transport network and its potential for the development of sustainable, affordable housing. Any capital receipts generated from the sale of TfL surplus land shall be allocated to TfL's transport investment programme.

Achieving more efficient and sustainable freight transport through consolidation will require greater use of micro-consolidation centres (as recognised by the Mayor in the draft in the MTS). However, in order to achieve the provision of such micro-consolidation centres to serve central and inner London it will be necessary for the public sector (the Mayor, boroughs etc.) to make available to freight transport operators affordable land for such use (as the profitability of the freight sector is such that it cannot compete for this land with other business sectors including residential housing developers). The Mayor therefore has an important role to play in ensuring the provision of available, affordable land for such use.

Policy 21

The Mayor, through TfL, will manage new transport services in London so that they support the Healthy Streets Approach, guided by the following principles:

- a) Supporting mode shift away from car travel: new transport services should not encourage more car journeys, especially where there are good walking, cycling or public transport options.
- b) Complementing the public transport system: new services should help more people who would otherwise complete their journey by car to access the public transport network, while not reducing walking and cycling to and from stops and stations. They should also provide a means of travel in areas where public transport connectivity is currently poor (especially in outer London).

Policy 21 currently contains no goods transport dimension in terms of the use of kerbside by these vehicles to achieve efficient freight operations.

Policy 21 also includes no mention of the potential for virtual loading bay systems to better utilise freight operations at the kerbside and avoid the circulation and double parking/waiting that can otherwise occur when no kerbside space is available.

- c) Opening travel to all: new services should be accessible to all Londoners and should not contribute to the creation of social, economic or digital divides in which some Londoners would have better travel options than others.
- d) Cleaning London's air: new services should prioritise ultra-low and zero emission vehicles to reduce emissions of carbon dioxide, nitrogen oxides and particulate matter in London and enable faster switching to cleaner technologies.
- e) Creating a safe, attractive environment on our streets:

new services and technology should help create a safer, quieter and more pleasant environment on London's streets, where it is more attractive to walk or cycle, and should not lead to existing active trips being made by non-active modes. There must always be an emphasis on the safety of passengers, pedestrians, cyclists and other road users.

f) Using space efficiently: new services must make efficient use of road and kerb space, be appropriate for the area of London in which they operate, and share data where possible to enable improved monitoring, operating and planning of the transport network.

Proposal 101

The Mayor, through TfL and working with the DfT and other stakeholders, will adopt an appropriate mix of policy and regulation to ensure connected and autonomous vehicles develop and are used in a way consistent with the policies and proposals of this strategy.

Despite the future implementation of autonomous freight vehicles, these will only be capable of reaching the kerbside. They will not be able to carry out the final leg of the delivery from vehicle to receiver (often inside a building, upstairs etc.) Robots will continue to be prohibitively expensive for carrying out these functions for many years even if the technology were to permit it. This final leg of the urban delivery in London will



therefore still require the use of people to carry it out for many decades to come.

Proposal 102

The Mayor, through TfL and working with Government, will fund the delivery of the strategy by:

- a) Maximising any available efficiencies, subsidising services at appropriate levels and ensuring that value for money is otherwise achieved from the existing and planned transport network.
- b) Seeking to ensure a sustained level of funding from fares, Business Rate Retention and other existing sources of income.
- c) Seeking additional taxes, powers or other similar mechanisms, including Vehicle Excise Duty in London, to create a fairer way of funding the delivery of transport schemes and services, to better capture and conserve the benefits they create and to enable the delivery of the transport and community benefits that the pursuit of this strategy will bring to London, the Wider South East and the UK as a whole.

To achieve consolidation in the provision of goods and services and thereby reduce the current intensity of road freight transport in London as envisaged in the draft MTS, the Mayor will need to work with the freight transport industry to ensure that the costs and benefits of such freight consolidation operations are not financial prohibitive. Otherwise, as previous research into innovative freight consolidation schemes has shown, these schemes will fail to function in a business environment despite their efficiency and transport sustainability potential they offer.