

Freight and logistics and the planning system: call for evidence

Introduction

Thank you for responding to our call for evidence on the effectiveness of planning and engagement with the freight and logistics sector.

Closing date is 6 October 2023.

View all the questions

This survey provides questions based on user choice, a [full copy of the questions is available \[opens in a new window\]](#).

Print or save a copy of your response

At the end of this questionnaire, you have the chance to either print or save a copy of your response for your records. This option appears after you press 'Submit your response'.

Save and continue option

You have an option to 'save and continue' your response at any time. If you do that you will be sent a link via email to allow you to continue your response where you left off.

It's very important that you enter your correct email address if you choose to save and continue. If you make a mistake in the email address, you won't receive the link you need to complete your response.

Accessibility statement

Read our [accessibility statement for SmartSurvey forms \[opens in a new window\]](#).

Confidentiality and data protection

The Department for Transport (DfT) and the Department for Levelling Up, Housing and Communities (DLUHC) as joint controllers are carrying out this consultation to gather evidence on the interaction between the freight and logistics sector and the planning system in England.

You can access [Our DfT online form and survey privacy notice \[opens in a new window\]](#) and [DHLUC's privacy notice \[opens in new window\]](#) for more information on how your personal data is processed in relation to this survey.

In addition to the information mentioned in the privacy statement we are additionally asking:

of individuals their previous sector experience
of organisations:

- your personal position in your organisation
- the description of the organisational type
- and for certain bodies, the employee size of your organisation

Personal details

1. Your (used for contact purposes only):

name?

email?

2. Are you responding: *

X on behalf of an organisation?

Organisation details

3. What is the name of your organisation?

4. What best describes your personal position in your organisation?

Chief Executive

Director

Senior Partner

Specialist

Engineer

Lawyer

Planner

X Another position:

5. What best describes your organisational type?

X Local or regional government body

Business size

6. What is the employee size of your organisation?

X 1 to 25 employees

26 to 50 employees

51 to 100 employees

101 to 250 employees

251 to 1,000 employees

Above 1,000 employees

Individual details

7. What sector or sectors do you have experience been in?

Planning

X Freight and logistics

X Another sector of work:

Strategic transport planning

Introduction

TfSE welcome this inquiry by the DfT and DLUHC into the relationship between the freight and logistics sector and the planning system, and specifically to assist Government understanding into where the planning system can appropriately support the freight and logistics sector, alongside the practical issues that arise within the system when planning the right infrastructure to do . We trust that our response to the questions posed below provide value to the DfT and DLUHC.

This is a draft officer response that will be presented to the TfSE Partnership Board on 30th October 2023 for them to agree. A further iteration may therefore follow.

TfSE is a sub-national transport body (STB) for the South East of England, bringing together leaders from across the local government, business and transport sectors to speak with one voice on our region's strategic transport needs. Since its inception in 2017, TfSE has quickly emerged as a powerful and effective partnership for our region. We have a 30-year transport strategy in place which carries real weight and influence and will shape government decisions about where, when and how to invest in our region to 2050. The Secretary of State has confirmed that they will have regard to our strategy in developing new policy. We work closely with the DfT to provide advice to the Secretary of State and our ambition is to become a statutory body with devolved powers over key strategic transport issues.

Our principal decision-making body, the Partnership Board, brings together representatives from our 16 constituent local transport authorities, five Local Enterprise Partnerships, district and borough authorities, protected landscapes, Highways England, Network Rail and Transport for London.

Strategic Investment Plan

Our Strategic Investment Plan (SIP) for South East England provides a framework for investment in strategic transport infrastructure, services, and regulatory interventions in the coming three decades. The plan provides a framework for delivering our Transport Strategy, which:

- is a blueprint for investment in the South East;
- shows how we will achieve our ambitions for the South East;
- is owned and delivered in partnership;
- is a regional plan with evidenced support, to which partners can link their own local strategies and plans – a golden thread that connects policy at all levels;

- provides a sequenced plan of multi-modal investment packages that are place based and outcome focused; and
- examines carbon emissions impacts as well as funding and financing options.

The plan presents a compelling case for action for investors, including government departments – notably the Treasury and DfT – as well as private sector investors. It is written for and on behalf of the South East's residents, communities, businesses and political representatives.

Freight, Logistics and Gateways Strategy

The TfSE area is the Gateway to UK Economy, with eight major ports including Dover, Thamesport, Southampton, Newhaven, Eurotunnel, Gatwick Airport, and although Heathrow airport and London Gateway are just outside our area they have a significant impact on the economic activity and roads and rail networks within it. Between them, our international gateways and transport networks move approx. 76 million tonnes of freight which is 16% of the UK.

We published our Freight, Logistics and Gateways Strategy in June 2022 through which we aim to address the challenges faced by the freight & logistics sector in our area, namely: road network congestion, decarbonisation including the need to encourage modal shift from road to rail; the potential for expansions at Heathrow, Gatwick, Dover and Southampton; lorry parking and driver welfare; the provision of freight infrastructure e.g. warehousing and distribution centres; and improving the public sector's knowledge of how the freight and logistics industry works to better address its needs. The Strategy lays out a series of key actions in the short, medium, and long term to mitigate these challenges between now and 2040 aiming to:

- Enable sustainable economic growth for the freight and logistics sector and across the TfSE area
- Ensure goods can be safely, reliably & efficiently delivered
- Minimise air pollution and carbon emissions
- Provide the evidence we need to make the case for more infrastructure investment in key areas, including that related to collaboration and innovation and
- Develop buy-in from all sectors of the freight industry and public sector to ensure improvements are delivered.

Our Approach

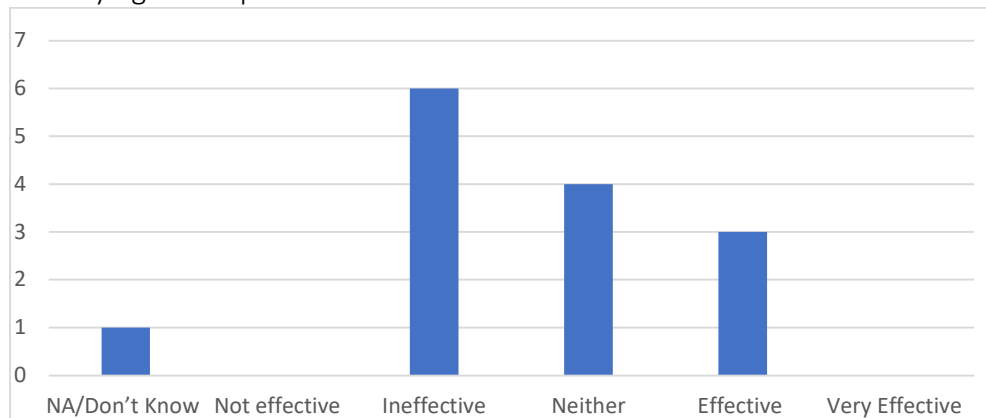
To inform and shape our response, we conducted an online 2-hour workshop on Wednesday the 13th of September with over 25 local authority (LA) planning and transport colleagues from across the region. This included representatives from Epsom and Ewell, Slough, Spelthorne, Ashford, Portsmouth, Southampton, Runnymede, Dartford, Hampshire, West Sussex, Woking, Lewes-Eastbourne, Elmbridge, Kent, Surrey, Swale, Wealden, Brighton and Hove and East Sussex. In addition to the workshop, we held three 1:1 discussions with LA representatives (Dartford Borough Council, Kent County Council, and Brighton and Hove City Council) on the 19th of September to ascertain more detailed information surrounding some of the questions. We have collated and presented our response to the Call for Evidence below.

Local plan making and land availability

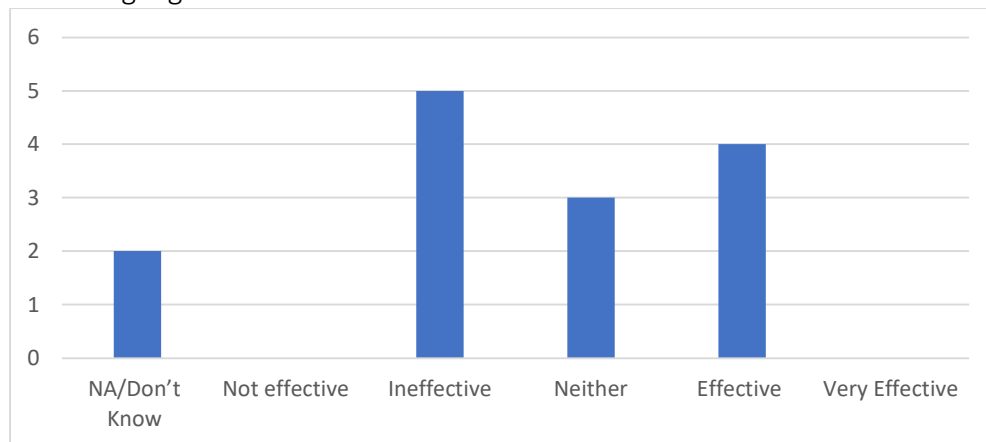
8. In your view, how effective are local plans at identifying development needs, and then allocating sites, for freight and logistics?

At our online workshop with LA planning and transport colleagues from across the region, we asked the two parts to the question separately:

Identifying development needs



Allocating logistics sites



9. Why do you think that and what evidence do you have for your viewpoint?

Identifying development needs:

With freight and logistics traffic being the result of multiple origins and multiple destinations, into, out of and through our region, Local Planning Authorities (LPA) and Local Transport Authorities (LTA) do not have easy access to data about freight flows to understand the freight and logistics needs within their area.

Through discussion, it appears that the lack of recognition comes from a lack of evidence base for commercial land use in general, and freight and logistics in particular. There is a lack of engagement between the freight and logistics sector and local authorities for a variety of reasons (see answers provided to questions 14 – 16), resulting in a limited understanding of the local needs of the sector. This can be complicated by land promoters, either the land owners/agents or property development companies, who often do not fully understand the infrastructure needs of new developments, and where potential freight and logistics occupiers are likely to be unknown at the Local Plan Planning stage.

To plan effectively local authorities need data. The freight sector holds data that could provide insights into their needs but are unable to share it due to commercial confidentiality. Collecting and interpreting specific local data is expensive to undertake and is likely to require investment over several years to provide a clear evidence base. Even if such data was collected, any resultant dataset may still be unclear as to longer-term freight and logistics needs as the freight and logistics industry is highly flexible and adapts rapidly to respond to customer needs and therefore the accuracy of this data may not remain consistent over time. Additionally, rapidly evolving technology, innovation and changes in delivery patterns post Covid-19 also make it difficult to obtain consistent and up-to-date data, unless it comes from a single source., For example, there is a lack of evidence to understand any demand for consolidation hubs within industrial estates or on existing or redundant retail sites.

Identifying development needs appears to be easier if a larger area is addressed, a good example of which is the Partnership for South Hampshire. The Partnership LPAs commissioned a study on forecast logistics land demand to inform a Statement of Common Ground between LPAs in the area which can be found [here](#). This study appears to be reasonable and suggested a fairly limited demand for 'big box' major distribution sites, and that identifying further land allocations particularly for large warehouses next to strategic road network (SRN) is a relatively minor part of subsequent work to develop a new spatial strategy to inform local plans across the area.

Allocating logistics sites:

Within the TfSE region there appears to be a better understanding of the allocation of freight and logistics sites. However, our discussions identified several reasons that can limit site allocation:

- The presence of the South Downs National Park and numerous AONBs limit available sites for many uses, including freight and logistics around the edges of coastal urban areas
- Many sites that come forward outside urban areas are deemed too small for freight and logistics requirements
- Logistics sites may be pushed out by higher value land uses (e.g. employment). This is particularly true within urban areas where last mile logistics hubs could reduce the impact of freight and logistics traffic
- The specific type of freight and logistics uses: e.g. HGV parking versus distribution centre sites versus waste transfer

- Limited sites are available next to the SRN and the capacity of highway infrastructure to any potential site may be very limited. This makes the allocation for alternative uses easier, e.g. residential, especially if housing requirements for the LPA are high relative to available land

To alleviate some of these issues LPAs suggested they may allocate mixed use sites, leaving it to the market to decide. Interestingly, Dartford Borough Council identified that brownfield areas and sites that already had outline planning permission had been easier to develop, as there had been less objection to the outline proposals and when detailed planning permission was sought, the Council could press harder for what it wanted due to the scarcity of similar sites available. One of the most recent example developments has been Amazon (planning reference DA/19/01515/FUL) where Amazon has provided an intensified bus service for staff to and from the site.

10. How, in your view, could the effectiveness of local plans at identifying development needs, and then allocating sites, for freight and logistics be improved?

The effectiveness appears to be improved if a larger area is addressed, or where the LTA & LPA collaborate more closely. The allocation of freight and logistic sites in liaison with the LTA will ensure consideration is given to road classification to access the site.

Currently, to fully understand the freight and logistics industry's needs requires the industry to engage in the plan-making process, something which seems to be lacking (see answers to q14 – 16). Better information could come from additional engagement between LPAs and the industry or through the availability of regional or national databases. Alternatively, a greater national or regional clarity on spatial need could improve the identification of freight and logistics development needs.

There is also a need for guidance on the methodology for articulating this need for freight and logistics developments and on what evidence should be available to the LPAs and/or evidence they should gather to judge the effectiveness of proposals. This would provide LPAs with the tools to recognise and plan for the right balance between 'big sheds' and 'last mile' facilities, and everything in between.

Finally, local plans need to consider freight and logistics requirements for all land uses, including residential, from a construction as well as occupation point of view.

11. Overall how effective are the national planning policy and associated practice guidance in supporting the needs of freight at the plan making stage?

Very effective

- Effective
- x Neither effective nor ineffective
- Ineffective
- Very ineffective
- Don't know
- Not applicable

We did not ask this question directly at our workshop, but the discussion provided some useful information, suggesting an overall view that it is neither wholly effective nor wholly ineffective.

12. Why do you think that and what evidence do you have for your viewpoint?

An ideal freight and logistics site would have easy access and good highway connectivity, and this is supported in national planning policy. However, there is an issue with policies pushing or rigidly requiring new sites to have direct access to the SRN, as it is arguably too high a bar given the land values and the viability of funding those links. For example, some proposed sites in Kent that are very close to the SRN but would require short local road journeys to a nearby junction have been refused (although there may have been other reasons behind the decision).

There is a shortage of land available as large areas of the region are designated as protected landscapes. In addition, many LPA and LTA areas within the TfSE region that host available sites near to existing highway and rail infrastructure are likely to be small and constrained. This makes the potential locations unsuitable as safe access is not possible.

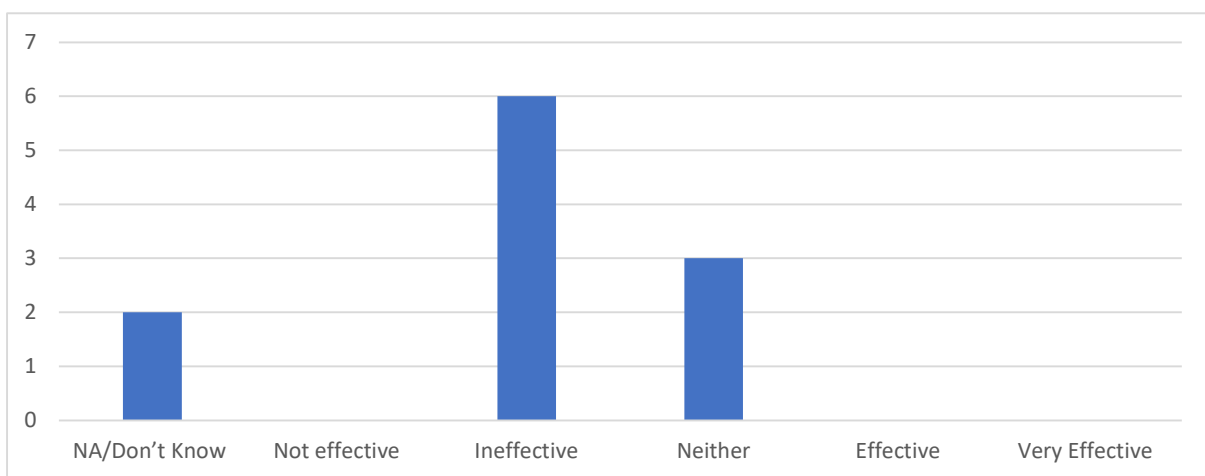
13. How, in your view, could the effectiveness of the national planning policy and associated practice guidance in supporting the needs of freight at the plan making stage be improved?

The NPPF currently provides very limited guidance on freight and logistics, proposing that new developments should “allow for the efficient delivery of goods”. However, the NPPF should encourage the local context for freight and logistics needs to be considered through the development of freight strategies as part of local transport plans (LTPs) and guidance on this should be provided. These strategies should cover larger freight movements to and through an LTA area, as well as the local delivery and servicing requirements. This would ensure that changes to last mile deliveries are given due consideration at a strategic level in the LTP and any Local Plans, and could link ‘Travel Hubs’ with delivery facilities, such as currently being developed in Southampton through the Transforming Cities Fund programme.

The NPPF currently states that policies and decisions should consider lorry parking, but it was suggested that it should be strengthened to “must consider lorry parking”, to encourage the provision of sufficient lorry parking to a suitable standard.

Local plan-making and land availability

14. How effective do you think is the engagement between industry and local authorities in the course of local plan-making?



15. Why do you think that and what evidence do you have for your viewpoint?

Engagement is currently ineffective between local authorities and the freight and logistics industry in the course of local plan-making. Engagement mechanisms for how the freight and logistics sector can input into the local planning process are unclear, resulting in inconsistent or late responses which impacts the extent that the results can inform local plan applications. When public consultations have been held, response from the industry has been limited due to a lack of LA awareness about who to engage with (e.g. due to the diversity of the sector potential freight operators are unknown or hard to identify). A low industry response rate to consultation could also be a result of misalignment between the freight and logistics industry planning and local plan making timeframes, as the industry is concerned on a short term site-by-site basis and day-to-day business, rather than the longer term wider strategic vision.

Engagement that does take place is predominately with the two biggest freight and logistics trade associations (Logistics UK and Road Haulage Association) rather than with individual local freight and logistics operators or the freight property sector. Additionally, as a private commercial activity, freight and logistics operators respond to their business customers, and (with a few exceptions for local ports or Business Improvement Districts) there is also limited engagement with local businesses. Ultimately, an association or forum of freight and logistics

companies, businesses with some knowledge of the local planning system and LPAs, would be beneficial, providing a means for LPAs to increase the levels of industry engagement.

Relationships with LPAs and the freight and logistics industry are much less well developed than with other sectors (e.g. public transport) which is further emphasised by a lack of resource and knowledge in the LPAs and, more widely, within LTAs. Other transport modes have been historically prioritised for capability or capacity funding; however limited opportunities have been presented for freight. Currently, no LPA or LTA has a dedicated freight officer, with freight issues only being considered on an ad hoc basis when it is absolutely necessary. In parallel, there is a lack of understanding about the demands from the freight and logistics industry, in relation to the road network, or clarity from the NPFF on typical sector needs at a strategic or local level. As a result of this, projects have taken a longer time to progress e.g. one LA was starting to trial sustainable last mile/local hubs projects but has been hindered by a lack of knowledge and experience, especially in the LPA, and a requirement to submit a full planning application.

Currently, not all LPAs have local plans that have policies addressing freight and logistics sites need and therefore there is a need for the industry to engage with and demonstrate how they can work with the LPAs in order to ensure that their needs are considered and to recognise the value of working with the public sector. It was acknowledged that site justifications for warehousing or freight and logistics facilities can be challenging as there can be reluctance from politicians to support what are perceived as low skilled jobs and negative local impacts, such as air quality issues and informal lorry parking.

There is a lack of a clear regional planning perspectives to coordinate and gather evidence, and to define the role of LTAs within the freight and logistics industry. Currently, LTAs participate in the engagement between the LPAs and the industry and therefore struggled to provide comments on this question.

16. How in your view, if at all, can this engagement be improved?

It was suggested that dedicated and targeted engagement could be conducted between local authorities and the freight and logistics industry, to better develop connections with representative freight bodies (e.g. Logistics UK, RHA and business groups), awareness of local issues and understanding of the needs of specific groups (e.g. cyclists). For example, Southampton has recently launched a new master planning forum which is focused on future growth aspirations in the city. The forum includes businesses such as the Port of Southampton (Associated British Ports) and Go! Southampton (the local Business Improvement District) who will both be important partners going forward.

Local authority engagement should ensure that freight and logistics representatives are engaged with as local strategies develop (e.g. local plans and LTPs). It was highlighted that representative freight and logistics bodies could be better resourced to respond to these engagement requests at a localised level, although it was acknowledged that competing

demands within organisations and their resources could hinder this. Alongside the master planning forum, Southampton has a Workplace Travel Network, which engages key businesses across the city on transport matters. Encouraging the inclusion of freight and logistics organisations into groups such as these would be a first step into their inclusion within local policy making.

17. How effective do you think planning currently is in supporting more efficient use of freight and logistics infrastructure?

TfSE has no comments to make in response to this question.

18. Why do you think that and what evidence do you have for your viewpoint?

N/a.

19. How, in your view, could the effectiveness of current planning be improved to better support more efficient use of freight and logistics infrastructure?

Some LTAs suggested that a regional understanding of existing freight and logistics infrastructure would be useful. Insights from the freight and logistics industry at the evidence gathering stage would also be very helpful here, not just when consulting on draft Local Plans

However, the largest response from both LPAs and LTAs was for a much greater understanding and awareness of the freight and logistics industry by officers. It is felt that existing planning degrees are very light on transport modules in general and freight in particular and more training for officers on freight and logistics issues would also be useful. Training was felt to be necessary for both development control and policy officers, and could be very helpful for Members.

A Good Practice Guide, with a range of practical and up to date case studies would also be welcomed.

Statutory local transport plans sub-national transport strategies

How, in your view, should freight and logistics be factored into statutory local transport plans and sub-national transport strategies?

There is general consensus that freight and logistics should be factored into local and sub-national transport strategies, with representatives welcoming the on-going development of sub-national or regional freight strategies. These can be used to identify preferred vehicular routes that can be applied within local plans, localised assessments to identify opportunities and constraints for the freight and logistics industry, and to ensure the regional perspective is communicated to the government so that planning policy can better address national and sub-national needs at a local level.

However, a key barrier to the industry's inclusion at present stems from several misalignments between the timelines and outputs of transport strategies and local plans including:

- LTPs and regional strategies do not need to identify or allocate sites
- Timeframes of the LPA local plan process and LTA's LTPs do not align which results in potentially outdated evidence bases being used with local plans. For instance, one LA highlighted that they were concerned as the LTA's new LTP would not be made available until after they had submitted their Town and Country Planning (Local Planning) Regulations (2012), Regulation 18 Local Plan which had used an evidence base from 2020. Therefore, when they come to submit their final local plan for Regulation 19, the evidence base may be significantly different.
- Local plan making does not yet appear to take account of carbon impacts which are increasingly driving LTPs.

These barriers are further emphasised by a lack of collaboration between some LTAs and LPAs, with limited willingness to share evidence bases and draft policies to support better alignment between local plans and LTPs. However, to ensure better representation of freight and logistics inclusion within local strategies, cross boundary collaboration between STBs, LAs, LPAs and LTAs could be improved to help mitigate political sensitivities and support increased communication and openness. Ideas included developing or improving strategic planning frameworks and joint LPA meetings with the relevant LTA.

It was highlighted that LTAs are currently not as well placed to advocate for the needs of the industry due to their policies carrying less weight than the overarching NPPF, and typically lacking 'skin in the game' as they do not operate or financially support initiatives. However, LTAs are well placed to set direction and to collaborate with LPAs to deliver consistent messaging to the freight and logistics sector. Freight and logistics needs and issues would therefore be more likely to be advocated for and included within transport strategy development as it was suggested that, at present, these issues are not often raised. This role is largely dependent on the political alignment between LTAs and LPAs, however this could be strengthened through encouraging collaboration as outlined above.

Several opportunities were also highlighted to maximise the impact of existing strategies including cross-boundary shared mobility hubs and strategic mobility interchanges (e.g. as

seen in the TfSE SIP) to encourage freight and logistics to be taken into account in all local planning.

Planning decision taking and the applications process

20. In your view which aspects of the existing planning decision making process work well?

The logistics developments that work well through the existing planning decision making are those for large warehouses located off of major trunk roads and located in unprotected areas. The system also works well if there is effective collaboration between the developers and the LPA, where the developers engage in constructive pre-application discussions at an early stage.

This provides evidence for our response on engagement (Q19), demonstrating that simple engagement on one site can assist in the decision making process. It also suggests that a wider engagement with the freight and logistics industry and increased knowledge on both sides (industry and local authorities), could improve strategic planning and the quality of future relevant planning decisions.

21. In your view which aspects of the existing planning decision making process do not work well?

In our workshop discussions, the length of time it takes to make planning decisions was seen as a key problem. This can be for a variety of reasons including, data availability, conformance to policy, and resident reaction.

Consultations, pre-application engagement, and continuous plan amendments can all delay the decision-making process. This is further exacerbated by the length of time any appeals may take.

Freight and logistics developments are usually in urban or sub-urban locations and need to be consistent with regeneration and environmental priorities and meet wider policy objectives. Allocating sites on the edge of an urban area in a Local Plan works in theory, but the scale of buildings proposed in outline planning applications can be vast and are then likely to be difficult to manage visually e.g. due to their impact to on the entrance to a nearby town.

Speculative land development schemes where the local community are not expecting it, often lack upfront public engagement. This can result in resistance from local residents due to perceived disruption and additional HGV traffic, and is likely to result in refusal by elected members and subsequent appeals. Applicants could do much more to engage with residents to explain the proposal and any measures to mitigate HGV traffic.

Trip generation and route information can aid in LTA consideration of the application. However, the existing publicly accessible data for freight traffic to and from general residential and commercial sites, and to and from freight and logistics specific sites, is limited to the

<https://www.trics.org/> database or requires trawling through known planning applications of similar developments elsewhere.

The lack of data availability on the freight impacts of a development can be critical. For example, if a freight operator is unwilling to provide sufficient data to support the decision-making process (claiming it is commercially sensitive) and the planning committee overturn a positive officer recommendation, the result may be a costly and drawn out appeal.

Land values for freight and logistics sites mean that some existing allocated sites for employment are under threat due to pressure for housing. As a result of these competing pressures, freight and logistics frequently seems to lose out to other land needs. At present, the freight and logistics industry and their customers (both businesses and residents, possibly represented through local organisations such as Business Improvement Districts) do not appear to be organised to currently challenge this, although this may be changing gradually with changing land values, post-pandemic.

Specific policy priorities

22. In your view how effective is the planning system at addressing the operational needs of the freight and logistics sector?

TfSE has no comments to make in response to this question.

23. Why do you think that and what evidence do you have for your viewpoint?

TfSE has no comments to make in response to this question.

24. How, in your view, could the effectiveness of the planning system be improved to better address the operational needs of the freight and logistics sector?

As stated in our response to Q19, the largest response from both LPAs and LTAs was for a much greater understanding and awareness of the freight and logistics industry by officers. It is felt that existing planning degrees are very light on transport modules in general and freight in particular and more training for officers in LHAs and LTAs on freight and logistics would also be useful, especially as it is a new and growing area of transport planning. Training was felt to be necessary for both development control and policy officers, and could be very helpful for elected members.

National Freight Network

25. How, in your view, could a National Freight Network be recognised and supported in planning?

TfSE has no comments to make in response to this question.

The decarbonisation of freight

26. How, in your view, can the planning system support our net zero ambition for freight and logistics?

The discussion identified a number of ways in which the planning system can support the net zero ambition for freight and logistics.

To support modal shift two key opportunities have been identified. The first relates to how the planning system can support zero emission last mile deliveries. For instance, the provision of delivery hubs in urban and rural areas could enable last mile deliveries via e-bikes and zero emission vehicles. The second opportunity relates to the planning approval process, and a consideration for how new logistics hubs can support access via sustainable modes of travel (e.g. bike or bus).

Ideas relating to micro consolidation, included ensuring that local consolidation facilities are provided as part of new developments; co-locating parcel collections with community facilities and/or supermarkets; and supporting the repurposing of redundant units to support micro consolidation are all under consideration. However, while the 2020 changes to land use classes have enabled some changes of use across the widened use class 'E', logistics use is often grouped as 'B2/B8' in new developments to maintain flexibility and maximise employment opportunities. Facilitating these new last-mile developments may require a further revision to the use classes or clear guidance to enable changes in land use that support the local area, for example microhubs for cargo bikes.

Zero emission vehicle charging HGV infrastructure was also proposed. Suggestions included the need for analysis to inform where charging infrastructure should be located, and a focus on hydrogen fuelling (not just EV) infrastructure.

There was also a number of proposals for the government to set national level standards (e.g. regarding HGV zero emission vehicles and charging infrastructure) and develop a national policy requirement to incorporate cycle provision when roads are upgraded where appropriate.

Driver parking and facilities

27. In your view what more could local plans and decisions do to facilitate the supply of more HGV parking and driver facilities?

While the South East has a high number of HGV parking facilities, [the DfT September 2022 National Survey of Lorry Parkng](#) identified a current shortfall of 1,132 overnight HGV parking spaces within the TfSE region on sites either on or near the Strategic Road Network. A recent draft report on lorry parking by AECOM for TfSE suggests the shortfall could be 1,528 overnight parking spaces on both the Srategic and Major Road Networks.

It was clear at our dicussions that not all LPAs were aware of this shortfall in lorry parking, or how to address the issue. What is clear is the need for a more strategic, cross boundary working to identify sites, especially around Heathrow and the M25. It was reported that this is a particular issue for authorities just outside the Ultra Low Emission Zone and its impact on demand for parking to accommodate non-compliant vehicles.

Issues were reported with competition for available land around existing motorway junctions. To create a lorry park with dedicated slip roads off the SRN would not be financially viable. Available land close to existing junctions off the SRN are often sold for storage, distribution or office uses which can afford these increased land values. LPAs prefer land uses that create large employment use, which a lorry park does not. This can lead to lorry parking sites being promoted in the Greenbelt where land values are much lower. However, it is much harder to achieve planning approval, an example of this was the rejection of the proposed motorway sevice area at Wrotham M26/M20 on the grounds that it was an inappropriate use of the green belt and Kent Downs AONB.

It was recognised that most existing industrial estates do not have provide facilities for drivers. Many freight and logistics vehicles will arrive early for delivery/collection at premises requiring the driver to take their mandatory rest period on the industrial estates, causing parking problems. Examples in Kent include Henwood in Ashford, Quarrywood in Aylesford and Eurolink in Sittingbourne.

The NPPF Paragraph 107 states 'Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.' However, this does not make specific comment on the provision of driver facilities i.e. toilets, showers etc. Planning is subjective and therefore down to the individual planning officers to account for this in their recommendations. Also, if provided it is then down to the company operating the sites once delivered as to whether they will allow vehicles to park overnight on their site. A local example of this in Medway Borough Council is the Amazon Distribution Centre at Hoo, which has caused lorry parking problems around the access roads to the site. Another example was cited where a parking site was recommended for rejection based on the exisiting local plan policy as the site was zoned for employment land, however, the site development was approved by the Planning Committee.

Discussion with LPAs suggested that planning guidance could be further updated to ensure that LPAs are making adequate provision through the local plan and site allocations process,

by working with the freight and logistics industry and the sector-specific property market (e.g. land owners and agents, specialist real estate companies, and property development companies) and statutory bodies. Design guidelines for Local Plan policies for industrial sites should also include parking and welfare facilities for drivers.

Strengthening the union

28. In your view how can planning policy in England help to support the freight and logistics sector across the whole of the UK?

TfSE has no comments to make in response to this question.

Additional evidence

29. What, if any, other evidence about freight and logistics and the planning system would you like to add?

File: {filename}

Choose File

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Comments:

TfSE has no comments to make in response to this question.

Final comments

30. Any other comments?

In summary, the discussions we have had with representatives from both the local transport authorities and local planning authorities in the TfSE area have highlighted a number of key issues related to freight and logistics and the planning system. The main findings from this work include the following:

- There is a lack of evidence available to local transport authorities and local planning authorities about the sectors overall requirements for land which makes it difficult for local authorities incorporate these requirements into their local plans. In addition, during the planning application stage, a lack of information about potential trip generation rates and vehicle routings can inhibit pre-application discussions.
- There is clear evidence of a lack of engagement between the freight and logistics sector and local authorities, resulting in a limited understanding of the needs of the sector which manifests itself in limited provision for these needs in local spatial and transport plans. This could be addressed through dedicated and targeted engagement between local authorities

and the freight and logistics industry, for example establishing local freight forums to facilitate this.

- It is evident that there is a need for more NPPF guidance on the methodology for articulating the need for freight and logistics developments and on the evidence that should be available to the LPAs and/or evidence they should gather to judge effectiveness of proposals. There was also a general consensus that freight and logistics should be included in local and sub-national transport strategies, with representatives welcoming the on-going development of sub-national or regional freight strategies. There should also be better coordination between the local spatial and local transport planning process, particularly in relation to their timing, and improved communication between local authority planning and transport officers when developing their respective plans.
- The current planning system works more effectively where there is meaningful engagement between the developers and the LPA. Wider engagement with the freight and logistics industry and increased knowledge on both sides (industry and local authorities) would improve strategic planning. The planning application process for freight and logistics sites works more effectively where developers engage in constructive pre-application discussions.
- With better guidance and more informed officers the planning system could support the government's net zero target better through, for example, allowing better provision of delivery hubs in urban and rural areas that enable last mile deliveries via e-bikes and zero emission vehicles. Also this should promote the need to give better consideration for how new logistics hubs can support access via sustainable modes of travel (e.g. bike or bus) at the planning approval stage.
- Regarding lorry parking and driver welfare facilities, it was not clear from the discussions that LPAs were aware of the lack of lorry parking sites, or how to address this. Some key issues were identified, for example, competition for available land around existing motorway and SRN junctions, with these often sold for 'higher value' storage, distribution or office uses. Again, lack of guidance was identified as part of the problem because the NPPF does not specify anything about the provision of driver welfare facilities at lorry parking sites.
- The biggest challenge during the discussion sessions was the lack of professional or on-the-job training for local authority officers on the needs of and issues faced by the freight and logistics sector.

To address some of the key issues raised above, TfSE would support improvements in both the NPPF and LTP guidance. The recently updated NPPF (published on 5th September 2023) provides only very limited guidance on freight and logistics. The NPPF strengthens the requirement for local planning authorities to take into account the regional transport strategies and local transport plans in relation to freight and other transport matters as this may provide beneficial outcomes for users, businesses and communities. It should also encourage the consideration of the local context for freight and logistics through the development of freight strategies as part of LTPs. These strategies should cover large freight flows and the wider regional requirements; movements from, to, and through an LTA area; the local delivery and servicing requirements for businesses and residents to support the local economy; and wider lorry parking guidance that includes the provision for driver welfare facilities.

The LTP guidance, which is under development, could also support the development of such strategies by outlining the freight issues local authorities need to consider in the development of their local plan and providing examples of possible solutions and appropriate actions and policies. LTP guidance should also promote more engagement with the freight and logistics industry and more collaboration between LPAs and LTAs to support the freight and logistics industry, and encourage safer, cleaner and more efficient delivery and servicing activity on our streets.

The guidance should certainly include consideration of rail connected sites and local logistics locations that have wider regional strategic importance; lorry parking and the provision of driver facilities; and the development of local logistics hubs and pick up and drop of sites (e.g. locker banks) to enable zero-emission deliveries.