

Future of Freight
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Dear Department for Transport

Freight and logistics and the planning system: call for evidence

1. Introduction

This letter presents the Association of Directors of Environment, Economy, Planning & Transport's (ADEPT) evidence on freight and logistics and the planning system in England. It has been prepared in response to Department for Transport's (DfT) call for evidence on 4 July 2023.

Our evidence covers the following issues:

- local plan making and land availability
- the existing knowledge gap amongst planners and key decision makers
- planning decision taking and the applications process
- how the planning system can support specific policy priorities, including:
 - supporting supply chains
 - decarbonisation of freight
 - heavy goods vehicle (HGVs) driver parking facilities and welfare
- efficient use of established freight and logistics infrastructure
- factoring freight and logistics into statutory plans and strategies

2. Local plan making and land availability

Freight and logistics are largely overlooked in Local Plan documents. These documents principally focus on policies associated with where people will live and work and often do not consider the future demands for the movement of freight and other goods. This omission can lead to significant negative impacts later in the life cycle of local developments, when the need for freight and logistics inevitably grows beyond the infrastructure that has been planned and implemented.

Local Plans frequently identify the importance of key strategic transport routes for the movement of goods. However, any policies relating to the planning of freight and logistics are often limited to the safeguarding of sites for future strategic freight interchanges –

projects that often bypass normal planning requirements as they are designated as Nationally Significant Infrastructure Project (NSIP).

More detailed policies that support the growth of and better planning of wider infrastructure to support the freight and logistics sectors, and unlikely to be designated as a NSIP, are often absent. This means that opportunities for 'joined-up thinking' around futureproofing and combining infrastructure needs are also missed.

In terms of wider infrastructure requirements, Local Plans typically do not cover the allocation of land for uses such as freight facilities, warehousing, fuelling infrastructure and parking. To address this an allocation for these land uses could be provided on a pro rata basis against the amount of allocated employment land in the Local Plan. Furthermore, Local Plans typically do not assess the energy requirements for the freight and logistics sector.

Within London, Local Authorities can draw upon Transport for London (TfL)'s extensive guidance on planning for freight and logistics. However outside London, guidance is much more limited or non-existent. For local authorities outside of London, this is a significant barrier to planning for freight and logistics.

Planning for freight and logistics is also overlooked within regional strategy documents. In 2019 the Government sought to agree Local Industrial Strategies with all areas of England by 2020. These were intended to be long term strategies based on clear evidence and aligned to the national Industrial Strategy to help better coordinate economic policy at the local level and ensure greater collaboration across boundaries.

There is also a role for Sub National Transport Bodies, which, with the exception of Transport for the North, do not have a statutory role but can help set a framework for Local Transport Plans. For example, Midlands Connect has a Strategic Transport Plan which includes a section on freight. However, while some strategies refer to the freight and logistics sectors (e.g., Greater Manchester's Local Industrial Strategy and West Midlands Local Industrial Strategy) others make no reference at all (e.g., the Oxford-Cambridge Arc Local Industrial Strategies), leading to an inconsistent approach to planning for freight across the country. Freight operates on a regional and national basis, for example what happens in Dover with freight will have impacts on the Midlands, therefore regional and national planning for freight networks and facilities is required.

In terms of local plan making and land availability, is recommended that:

- There is an increased prioritisation of freight within Local Plans.
- Detailed policies are developed for allocating land for freight infrastructure.
- The energy needs of the freight and logistics sector are considered.
- A clear role is established for Sub National Transport Bodies and how planning for freight at regional level should feed into plan making and land availability at a local level.

3. Knowledge gap

There is a concern that limited knowledge about freight and logistics amongst planners and decision makers is resulting in a knowledge gap, which is contributing to freight and logistics issues being overlooked within local plan making. From an ADEPT perspective, it can be challenging to understand the needs of the freight sector in local settings due to operators ranging from small local firms to large multinational organisations. Furthermore, different

types of freight transportation (e.g., rail, air, maritime) have different requirements and needs.

Freight and logistics training for planners and key decision makers is currently limited, with courses instead focusing on operational training. Course providers such as the Chartered Institute for Logistics and Transport (CILT) offer courses to members and organisations such as the Construction Logistics and Community Safety (CLOCS) and Construction Logistics Planning (CLP) provide guidance on freight and logistics matters. However, the information they provide often has little coverage of matters relating to planning for freight and logistics – especially at a strategic level.

This knowledge gap will only increase, as there are limited opportunities for Local Highway Authorities to help address immediate and future skills shortages within the freight and logistics sector. However more generally, Local Authorities can support and promote Science Technology and Maths (STEM) subjects.

In terms of addressing the knowledge gaps, it is recommended that:

- Work is undertaken to improve communication between the freight and logistics sector and planners and decision makers, either through existing channels (e.g., Logistics UK) or via new working groups, trade bodies and organisations.
- Improved training relating to freight and logistics is made available to planners and decision makers, to increase understanding of the diverse requirements of the freight and logistics sector.
- Work is undertaken to address freight and logistics skill shortages. This could be achieved through support from Local Highway Authorities and the promotion of STEM subjects.

4. *Decision making*

The needs of freight and logistics sector are largely overlooked within the planning process and, where referenced at all, is often focused on the immediate localised impact of development (e.g., the serviceability of the site by HGVs or delivery vehicles). There is generally no consideration of the wider freight and logistics issues and how these could be improved.

There is a need for decision making to take place at a scale greater than local authority level and, whilst consideration of freight and logistics matters by Sub-National Transport Bodies within their strategic transport plans and strategies is beneficial, more needs to be done on making sure cross-boundary, joined up conversations on freight and logistics matters are happening between neighbouring authorities.

This lack of wider contextual consideration of freight and logistics is reflected in national planning policy and guidance. This tends to be very high level and does not focus on freight requirements. Where guidance does exist, it focuses on the immediate need, rather than examining the need for futureproofing in freight and logistic infrastructure planning. Planners and decision makers require further clarity and guidance on how to apply policy in the context of the future and emerging needs of the freight and logistics sector – particularly around matters such as autonomous delivery robots and the use of drone technologies. Often the regulations are absent/playing catch up with the new technologies that the freight and logistics sector wants to trial and implement.

In terms of addressing decision making, it is recommended that:

- Cross-boundary communication between local authorities on freight and logistics issues are improved.
- National planning policy on freight and logistics is expanded to place more emphasis on ensuring freight and logistics issues are considered a regional level. This is to ensure decision making considers medium and long term issues at a regional level and does not simply focus on the more immediate, short term, local impacts.

5. Supporting specific policy priorities

a. Supporting supply chains

The planning system does not reflect the operational needs of the freight and logistics sector. Without collaboration between local authorities, the right knowledge and good planning guidance there is little opportunity to foster a collaborative and holistic freight and logistics network across the UK. For example, supply chains often span multiple local authorities – each of which have their own planning objectives. This has the potential to complicate and hinder the efficiency of supply chains. Improved collaboration could support the creation and connectivity of regional hubs.

b. Decarbonisation of freight

The decarbonisation of freight has been successful in urban areas through the growth of cargo bikes, electric vans and light electric vehicles for last mile delivery trips. This success reflects the proposals set out in 'Gear Change' and is a good opportunity to build decarbonised freight and logistics options on an initially local scale.

It is key to the future of freight that the planning system and guidance prioritises a long-term vision of alternative fuel HGVs, which include electric and hydrogen. In part this progress requires improvements in zero emission technology for HGVs (e.g., truck battery sizes), but it is vital that this is supported by, in the case of electric, the necessary electric vehicle charging infrastructure on the strategic road network (SRN). Due to its efficiency over longer distances, the use of hydrogen has been promoted across the transport sector. As a part of this it is important that the impact of increased demand for electric vehicle charging on the National Grid is considered to ensure it does not inhibit the roll out of electric HGVs.

c. HGV parking facilities and driver welfare

At present there is a significant shortage of parking and welfare facilities for HGVs along major routes. This is resulting in significant impacts on the local highway network and local communities.

Guidance already exists for industry operators who want to apply for planning permission to develop new HGV parks and driver welfare facilities, but it is clear that the level of provision required is not being delivered fast enough or in the numbers/places needed. While the processes exist to provide new lorry parks, this is not currently linked to the quantum new developments generating HGV movements. The planning system must relate any increase in business/logistics/industrial land use to an increase in parking space for HGVs and driver welfare facilities.

Grant scheme funding can incentivise the private sector to develop such sites, not only to reap benefits such as improved facilities but also to bring additional jobs and economic benefits to the local areas.

Mechanisms need to be considered to encourage, speed up and reduce barriers to the introduction of new HGV parking and welfare facilities in areas where the private sector is not providing adequate facilities. Local authorities could support such development by allocating land via the Local Plan process for HGV parking .

Consideration should be given to incentivise/mandate the freight sector to use formal lorry parks, for instance through work with insurance providers. This would minimise the environmental and community impact caused by the significant volume of informal overnight HGV parking that takes place every night in inappropriate locations across the UK.

6. *Efficient use of established freight and logistics infrastructure*

Creativity, innovation, and planning reform is required to unlock the potential to plan for flexible, multi-use spaces that support freight and logistics needs but also provide additional opportunities. For instance, a bus depot could also be located near a storage and distribution centre, to enable both HGVs and buses to use the same electric vehicle charging infrastructure. However, for this to be successful, freight and logistics must be embedded into the planning system, to ensure that key opportunities for cross-pollination of infrastructure needs and developments can be identified and actioned.

As a part of this the use of delivery consolidation centres should be considered early in the planning process to help mitigate the impacts of the freight and logistics sector on sensitive land uses. Delivery processes could be staged across multiple consolidation centres to mitigate any adverse effects from freight movements (for example: traffic congestion, noise impacts and air quality impacts), with the first mile / last mile being undertaken by sustainable modes of transport (e.g., cargo bikes).

7. *Factoring freight and logistics into statutory plans and strategies*

More needs to be done to improve the disconnect between the freight and logistics sector and the strategies and statutory plans that form key parts of the planning process. It is important that new guidance on the preparation of Local Transport Plans (LTPs) places priority on the movement of freight and goods.

Changes to Local Transport Plan guidance would ensure Local Highway Authorities give more consideration and weighting to issues facing the freight and logistics sector. However, this needs to be backed up by the planning process and the Local Plan. Changes would also ensure that freight and logistics requirements are at the forefront of project plans, and that futureproofing opportunities are not missed at the planning stage. Plans at all levels, including local, sub-national and national, should also be agile enough to be adaptable considering emerging and disruptive technologies. Present examples include but are not limited to a shift to alternative propulsion methods (e.g., hydrogen, electric), drones, robot deliveries and Connected and Autonomous Vehicles (CAVs).

Freight and logistics working groups should also be considered. These should be setup to identify positive changes to the planning system that improves the disconnect between the freight and logistics sector and planning process. The working groups should include a mix

of stakeholders from central government, local government and the freight and logistics sector; ideally with knowledge of emerging and disruptive technologies.

The inclusion of freight and logistics representation into the sub-national transport strategies which omit this representation would also allow local authorities to maintain a sense of agency around freight and logistics in their regions, setting a framework and promoting interconnectedness between local plans and aspirations and the wider needs of the Strategic Road Network (SRN) The Midlands Connect sub-national transport strategy is an example of a transport plan which does include freight and logistics representation, to guide local authorities in this area.

8. Conclusions

It is clear from the evidence presented that there is a significant gap in the planning system around freight and logistics. The increasing need to factor in future opportunities for net zero across the SRN brings into sharp focus the limitations of the current system, but this is not the only pressing issue. Knowledge gaps within planning and highway authorities and inconsistent localised guidance has led to freight and logistics planning becoming fragmented and focused on immediate localised issues. This has led to significant knock-on challenges both in relation to the availability of HGV parking and driver welfare facilities and the efficient operation of the UK-wide supply chain.

These issues could be addressed through improved national planning policy and advice that supports a holistic and collaborative freight and logistics network, where future opportunities for sustainable freight and current need are addressed at the planning stage. This could provide new employment opportunities and yield economic benefits.

About ADEPT

ADEPT brings together directors from county, unitary, metropolitan and combined authorities, along with local enterprise partnerships, sub-national transport bodies and corporate partners drawn from key service sectors. ADEPT is a membership based, voluntary organisation with members across the country. Our primary role is to take the lead in transforming local authorities. We represent members' interests by proactively engaging central government on emerging policy and issues, and promoting initiatives aimed at influencing government policy.

Yours sincerely

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