Department for Transport – Freight, logistics and the planning system: call for evidence

Submission by:

The Centre for Sustainable Road Freight (SRF)¹

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Question 1
In your view, how effective are local plans at identifying development needs, and then allocating sites, for freight and logistics and how could this be improved?

SRF response:
An SRF briefing report has identified that local plans and the employment studies that are used to inform them are not well suited to identifying freight transport and logistics land development needs, and then allocating sites for these purposes. In addition, freight transport and logistics land uses have often been viewed negatively by local planners and economic development officers based on rates of job creation per unit area and pay rates. However, automation in modern warehouses is creating many more professional and higher paid jobs (Allen and Piecyk, 2023a).

It has been argued by property consultants that local plans and supporting employment studies are, “backwards looking and projecting forward historic trends as a proxy for future demand. As a result, modern day growth drivers are not taken into account, for example: housing growth, online retailing growth, increasing UK freight volumes and the need for larger premises, all of which generate increased demand for I&L (industrial and logistics) land and floorspace” (BPF and Savills, 2022, p.19).

References
https://www.csrf.ac.uk/outputs/warehousing-in-the-uk-operations-planning-and-decarbonisation/

BPF and Savills (2022) Levelling Up - The Logic of Logistics, BPF.

Question 2
How effectively are the policies in the national planning policy (Chapter 6) and associated practice guidance applied by plan makers in supporting the needs of freight and how could this be improved?

SRF response:
Current National Planning Policy Framework (NPPF) and associated guidance does not provide the clarity of guidance about the strategic needs of freight transport and logistics that is required. Even where national guidance is provided in these documents it is typically not reflected in local planning authority documents and practice. The current local needs for freight transport and logistics land is not well supported by either these national or local documents (Allen and Piecyk, 2023a). The NPPF and national guidance requires amendments and additions to better advise and support these local planning documents (to help facilitate more consistent approaches at the local level) and freight and logistics operator needs.

Property consultants have proposed ways in which the UK Government could reform and improve Planning Policy Guidance (PPG) to help ensure that freight transport, warehousing and other industrial land requirements are better reflected by local planning authorities (Turley, 2017).
Question 3
How effective is engagement between industry and local authorities in the course of local plan making? How can this be improved?

**SRF response:**
Work carried out by SRF and also by the Central London Freight Quality Partnership (CLFQP) has shown that close working between local planning authorities and freight transport operators can result in much improved plans and on-the-ground actions for streetscape redesign in urban areas (such as in the Tottenham Court Road scheme led by Camden Council, The Oxford Street Scheme led by Westminster City Council, and the plans for freight transport operations in streets in the City of London (see Allen and Piecyk, 2022). However, such interactions between public and private sector organisations often takes place far too late in the planning, design and implementation process.

The CLFQP, London Industrial and Logistics Sounding Board (London ISLB) and other public-private freight transport partnerships in the UK and overseas have shown the scope for improved strategic planning and local plans with the opportunity to develop close working relationships and understanding between the relevant parties (Allen et al., 2010; Allen and Browne, 2016).

Many working in public-sector planning and transport roles at the national, regional and local levels have not studied freight transport and logistics as part of the engineering, planning, transport and other degree programmes. The freight and logistics industry also suffers from a poor image and is regularly misrepresented in the media and arts, further compounding this lack of appreciation and interest in it (Allen and Piecyk, 2023b). There is a lack of suitable training programmes in logistics and freight transport for civil servants and local planning and transport officers to enable them to better understand their role, economic and social importance and operations (Allen and Piecyk, forthcoming).

Freight Quality Partnerships were first promoted by the UK Government in the daughter document on Sustainable Distribution to the 1998 Transport White Paper (A new deal for transport: better for everyone). A guide to setting up and running Freight Quality Partnerships was published by the DfT as part of the Transport Energy Best Practice Programme in 2003, together with examples case studies of such partnerships (Department for Transport, 2003a, 2003b).
References

Allen, J. and Browne, M. (2016) Success factors of past initiatives and the role of public-private cooperation, Deliverable 2.3, report prepared for the CITYLAB Urban Freight project. https://westminsterresearch.westminster.ac.uk/download/dea9721038b182446128bf044984ed371a1bfdb8a5b5e04b5008ab0db1c34ce5/717562/CITYLAB%20Success%20factors%20of%20urban%20freight%20initiatives%20D2.3%202016.pdf


Question 4
How effectively does planning currently support more efficient use of established freight and logistics infrastructure and how could it better support existing infrastructure?

SRF response: 
Whilst efficient use of space on logistics sites is important and should be encourage, policies seeking intensification of logistics sites need to be carefully considered and designed. Efforts to intensify logistics sites can be especially problematic in the case of urban areas. As mentioned in response to question 7, the Mayor of London’s efforts to achieve a site plot ratio of 65% in the draft version of the 2021 London Plan led to much consternation within the logistics property industry and responses to his consultation noted that plot ratios for some urban logistics sites can be as low as 25% when yard space is critical to a logistics operation, and that 65% plot ratio would exclude many logistics and industrial activities that rely on operational yard space. CBRE carried out an analysis of the London Plan evidence base data
that showed that the most prevalent plot ratios for urban logistics sites in London were between 40%-60%. CBRE also reviewed 56 urban logistics developments in London. For these sites, the plot ratios ranged from 20-62%, and the mean and median average plot ratio were 45% and 43% respectively (SEGRO, 2019).

A report commissioned by the Greater London Authority into the intensification of logistics and industrial land in London devised a typology to indicate whether or not different activities in buildings of various sizes require yard space for their primary operations (i.e. in addition to the overall yard space loading / delivery needs that are pertinent to all industrial operators). The report stated that these occupiers need dedicated yard space, rather than shared yard (which is an option for most other occupiers) (We Made That et al., 2018).

In its written response, the London Industry and Logistics Sounding Board (ILSB) noted that its members had “significant concerns about the proposed 65% plot ratio as a tool for managing and monitoring industrial capacity, and the type and extent of new industrial development that this mechanism might deliver. The requirement to re-provide existing floorspace or 65% plot ratio in new industrial development would, in some cases, create inappropriately designed premises with insufficient yard capacity to cater for logistics vehicles and operational needs. Overall, we do not believe the 65% ratio to be justified” (London Industry and Logistics Sounding Board, 2019).

Therefore, whilst freight and logistics sites can sometimes be intensified to free up space for other uses, there are important constraints and limits to such intensification in practice. Freight and logistics sites often require relatively low plot ratios to accommodate vehicle ingress/egress and turning circles, as well as the need for outside facilities such as maintenance, fuelling, storage and vehicle parking requirements. Multi-storey logistics facilities, while promoted by some policymakers, especially for urban areas, are less efficient and far more costly than single storey buildings, and are therefore not popular with many operators. The sharing of freight and logistics sites with residential uses is not common due to the noise and operating hours of these operations. Instead, such efforts to intensity industrial sites by including residential use typically results in light industrial rather than freight and logistics uses, thereby further reducing the availability of land for the latter (Allen and Piecyk, forthcoming).

The London Plan is produced by the Mayor of London but has to be agreed and signed off by the UK Government. In June 2020, the UK Government requested the removal of this 'no net loss' policy from the Plan, stating that such a policy would prevent the meeting of housing targets in London, and wanting also to provide London boroughs with greater control to decide about the release and redevelopment of industrial land for this purpose. The UK Government requested that Paragraph 6.4.5 in the final published London Plan was changed. In the draft version it had read “Based upon this evidence, this Plan addresses the need to retain sufficient industrial, logistics and related capacity by seeking, as a general principle, no overall net loss of industrial floorspace capacity across London in designated SIL and LSIS”. In the final version published in 2021 this was changed to read “Based upon this evidence, this Plan addresses the need to provide sufficient industrial, logistics and related capacity through its policies”. So a much diluted ambition.

Then in December 2020, the then Secretary of State for Housing, Communities and Local Government requested further changes to this policy which resulted in further revisions to paragraph 6.4.8 and policies E4-E7 concerning industrial and logistics land. These revisions grant London boroughs with the potential to continue using protected industrial and logistics land for housing and the scope to substitute industrial and logistics land from built-up areas to outer London and beyond the Greater London boundary, despite the growing demand for storage and distribution land focusing on central and inner London (Allen and Piecyk, forthcoming).
Such intervention at such a late stage by national Government ministers in the development of Local Plans is unhelpful. In the specific case discussed, it has adversely affected the future provision of freight and logistics land in London.

Permitted Development Rights for housing can further reduce the provision of industrial and logistics land (land use class B and E) for sites under 500 square metres. To prevent this, local planning authorities could decide or be made to require the submission of a planning application for such change of use.

Some so-called ‘dark kitchens’ (where meals are prepared in response to online orders) that have opened in recent years have made use of the changes to land use classifications arguing that they fall into the new use class E(g)(iii). Since this reclassification of the Land Use Class classifications, it is possible to convert an existing building within Use Class E (such as a shop, office, café/restaurant) to a use within E(g)(iii) without the need for planning permission (as long as no external building works are necessary). However, if the dark kitchen is located near to residential property, then it may result in noise, traffic and smells which would mean that given its scale and impacts it should not be placed in the new use class E(g)(iii) and should instead be placed in the Sui Generis Use Class and that planning permission is required and planning conditions should be imposed on its building requirements and operations (Allen and Piecyk, forthcoming). A dark kitchen could also be considered to fall in use class A5 ‘Hot food takeaways’ (use for the sale of hot food for consumption off the premises - which since 2020 has been moved to the ‘Sui Generis’ use class and would therefore require a planning application). However, class A5 typically involves sales taking place onsite by visiting customers. Dark kitchens generate substantial numbers of vehicle movements (far higher than typical logistics sites) as well as noise and disturbance and operate from early morning to late evening seven days per week. Riders waiting for orders may have to wait outside which further contributes to noise, litter and other anti-social behaviour if waiting areas and toilet facilities are not provided on-site for their use. Therefore if located in close proximity to residential property, a lack of need for planning permission is inappropriate (Allen and Piecyk, forthcoming).

So-called grocery ‘dark stores’ (where online orders are picked and then dispatched to customers on an instant basis) are classified as Use Class B8 (storage and distribution). Therefore, a planning application is usually required to change a building from another Use Class to B8. However, providing the floor space of a property is less than 500 square metres, then the change of use from within Class B1 (business) or B2 (general industrial) to a use for any purpose falling within Class B8 (storage or distribution) is permitted development by virtue of Schedule 2, Part 3, Class I of the Town and Country Planning (Permitted Development) Order 2015 (as amended). Many such grocery dark stores are under 500 square metres and therefore have not required planning permission for change of use from offices and general industrial buildings to dark stores. Operators of dark stores have in some such instances applied for a CLEUD to confirm their use change of use of the building from Class B1 (business) or B2 (general industrial) for B8 purposes. However, the issuing of these is usually a formality. Like dark kitchens, such grocery dark stores also generate very high numbers of vehicle movements as well as noise and disturbance and also operate from early morning to late evening seven days per week. Therefore if located in close proximity to residential property, such a lack of need for planning permission is inappropriate (Allen and Piecyk, forthcoming).

In the case of a grocery dark store below 500 square metres it will also require an application to the local planning authority for a premises licence to sell alcohol, and its hours of operation and the local impact of its delivery operations can be regulated by licensing authorities through this means (Allen and Piecyk, forthcoming).
The French Government originally ruled that dark stores were shops, but following much criticism from urban authorities, member of the public and other organisations changed this decision so that dark stores will be designated as warehouses rather than retail shops. This new law, enacted in July 2023, provides urban planning authorities with more ability to act to prevent them gaining planning permission if they so wish, giving the far greater controls that already exist concerning planning permission for warehouses in France.

Further detail is required from the UK Government about the freight and logistics planning and development arrangements for Freeports and Investment Zones.

See also the response to question 7 about increasing the handling of vehicle arrivals and departures and reducing the impact of individual freight and logistics sites.

References


Question 5
How should freight and logistics be factored into statutory local transport plans and sub-national transport strategies?

SRF response:
There is clearly much scope for the relevant freight elements of sub-national transport strategies to be better reflected in and integrated into local transport plans so that transport and spatial policies are better aligned across authority boundaries and could thereby identify improvements to the local transport networks across such boundaries. This would require far closer working relationships between those responsible for these outputs in these various authorities and bodies both at the regional-local level, as well as between those in local planning authorities that serve large urban areas. It would also benefit from the inclusion of views and opinions of organisations that represent freight operators in such working relationships (see the example of the Central London Freight Quality Partnership in response to question 3, the Tyne and Wear Freight Quality Partnership and the London Freight Forum (organised by Transport for London)). Establishing such relationships is time-consuming as well as requiring funding and continuity. Given these requirements, experience with Freight
Quality Partnerships has shown that they are best organised by personnel in a public sector organisation or by an independent body such as a university or professional body. It is important to recognise that there will be competing interests among some of these parties, even among some local planning authorities, so consensus can be difficult to achieve and strong, long-term working relationships are required (Allen et al., 2010).

It should also be noted that sub-national transport strategies and local plans do not currently always contain a strong appreciation of the economic and social importance of freight and logistics in providing the goods and services that allow businesses and residents in local areas to function and flourish nor of the end-to-end supply chains on which local deliveries and collections are but a small part. In this light, it is important that freight and logistics strategies and policies are factored into consideration of active travel (as discussed in response to questions 8 and 10).

See also our response to other questions for further points relevant to this question.

**Question 6**
What aspects of the applications and decision taking process work well and what aspects do not work well?

**SRF response:**
SRF is not closely involved in specific planning applications for freight transport and other logistics facilities. However, delays in decisions-making concerning planning applications and the costs of resubmissions can be a burden and deterrent to planning applications for freight transport and logistics facilities (for road, rail, port and air modes). Such delays can also hinder the expansion of businesses and the efficiency of freight transport operations (Allen and Piecyk, 2023a).

Systems used by developers to forecast freight vehicle trip generation rates at new freight and logistics facilities often underestimate these movement, potentially resulting in local impacts when schemes are operational. Local planning application systems often fail to check these forecasts due to lack of funding, expertise and access to the necessary forecasting tools. New forecasting tools are required to reflect modern logistics systems and the trip rates associated with them and avoid the problems that can arise from miscalculations of these trip generation rates.

Local planning approval also needs to be more aware and informed of the building infrastructure design and logistics operations measures by which developers, building managers, occupiers can efficiently and sustainably manage goods collection and deliveries and which can be made part of the planning approval process to reduce operational impacts. Local planning authorities also require greater powers to encourage and compel the use of such approaches and the difficulties that can arise between placing such requirements on developers and then trying to enforce these with occupiers and tenants (Allen and Piecyk, forthcoming).

Local planning decisions are not keeping up with the freight and logistics facilities required by online shopping businesses (for parcels, grocery and on-demand meals). The planning system is failing to differentiate between and appreciate the freight efficiency and impacts of these various sectors of the online shopping industry. In addition, land use classifications (including changes made during the Covid pandemic) have resulted in some inappropriate facilities being developed for use as grocery ‘dark stores’ and meal preparation ‘dark kitchens’ given their proximity to urban residential property (Allen and Piecyk, forthcoming).
References

https://www.csrf.ac.uk/outputs/warehousing-in-the-uk-operations-planning-and-decarbonisation/


Question 7
How effective is the planning system at addressing the operational needs of the freight and logistics sector and how could this be improved? How could a national freight network be recognised in national planning policy?

SRF response:
There is a lack of understanding among some policy makers at local, regional and national levels about freight transport and logistics. This can result in too much focus on local vehicle activity without an appreciation of product supply chains and the totality of freight transport and logistics operations within them (including inter-regional, national and international operations).

Policymaker planning decisions can often work against the interests of the freight transport and logistics sector. This is due to factors including the limited geographical coverage of local planning decisions that by definition do not take account of the extent of freight and logistics operations and supply chains needed to serve businesses and residents in any given location, the pressure for residential housing (and the pressure applied by politicians and developers to deliver this), and long-standing (and not necessarily correct) views among policymakers about freight and logistics developments generating relatively few and poorly paid jobs per unit area compared with other commercial uses.

In some instances local planning authorities come under pressure not to safeguard land in Local Plans for freight and logistics from national politicians. For instance, as discussed in our response to question 4, in 2020 the Mayor of London was requested by the UK Government to remove from the London Plan its ‘no net loss’ policy for Strategic Industrial Locations and Locally Significant Industrial Sites which was intended to prevent its release and conversion to other uses including housing. The then Secretary of State for Housing, Communities and Local Government responsible requested its removal, stating that such a policy would prevent the meeting of housing targets in London, and wanting also to provide London boroughs with greater control to decide about the release and redevelopment of industrial land for this purpose. Further dilution of the Plan in relation to logistics and industrial land was requested by the UK Government before it approved it in 2021, including revisions that granted London boroughs with the potential to continue using protected industrial and logistics land for housing and the scope to substitute industrial and logistics land from built-up areas to outer London and beyond the Greater London boundary, despite the growing demand for storage and distribution land focusing on central and inner London. Such political intervention interferes with the provision of freight and logistics land where it is required by operators as well as
potentially increasing freight transport activity and its GHG emissions in serving urban areas, especially for delivery operations using LGVs and other smaller vehicles, and can restricts the potential to use electric vehicles.

While freight and logistics sites can sometimes be intensified to free up space for other uses, there are important constraints and limits to such intensification in practice. Freight and logistics sites often require relatively low plot ratios to accommodate vehicle ingress/egress and turning circles, as well as the need for outside facilities such as maintenance, fuelling, storage and vehicle parking requirements. Multi-storey logistics facilities, while promoted by some policymakers, especially for urban areas, are less efficient and far more costly than single storey buildings, and are therefore not popular with many operators. The sharing of freight and logistics sites with residential uses is not common due to the noise and operating hours of these operations. Instead, such efforts to intensity industrial sites by including residential use typically results in light industrial rather than freight and logistics uses, thereby further reducing the availability of land for the latter (Allen and Piecyk, forthcoming).

Changes in land use classifications has had some potentially unintended consequences in the case of grocery dark stores and dark stores serving online shopping sectors that are leading to adverse consequences for residents living in close proximity to them. These include substantial trip generation and other social and environmental impacts (Allen and Piecyk, forthcoming).

Current design research and guidance provides little information about freight transport and logistics operations and consideration of loading and unloading operations in residential and urban areas. Such guidance includes the 2018 UK Government commissioned, independent ‘Building Better, Building Beautiful Commission’ which produced a report on the design quality of homes and places; the 2007 and 2010 Manual for Streets; and parking guidance produced by professional transport bodies and organisations (which similarly, have had relatively little to say about on-street loading/unloading in terms of the needs of freight operations and provision of suitable facilities for this). This needs to be addressed, with such street and place design guides included coverage of freight transport considerations and how best to accommodate these in local street and place design (Allen and Piecyk, 2022).

The aim of creating a national freight and logistics network which takes account of end-to-end freight journeys and assists in understanding the relationship of cross-modal national freight journeys with the international supply chains with which they is connected is an important one. As the Future of Freight Plan has noted, such a national network perspective could be used to facilitate improved freight and logistics strategy, planning, infrastructure investment and operational decision-making. However, it is important to note that this is broadly similar to the aspirations of the 2008 UK Government Transport White Paper (Delivering a Sustainable Transport System and its accompanying logistics daughter document) which subsequently achieved little progress. This indicates the scale of the challenge and the need for a long-term approach and commitment to such an approach that is capable of withstanding the vagaries of government budget cuts and changes in administration. It is also important that work on such a national freight and logistics framework includes the involvement of all necessary UK government departments to cover both transport, land use and freight and logistics buildings considerations, as well as receiving the input of sub-national bodies and the freight industry from its outset.

References

Question 8

How can the planning system support our net zero ambition for freight and logistics?

**SRF response:**
According to UK Government official data road freight transport operations have performed least well compared with other transport modes in terms of GHG emissions since 1990. GHG emissions from LGV operations have risen substantially since 1990, while those from HGV operations remain virtually unchanged. This is despite improvements in engine efficiency and the shift towards the use of larger LGVs and larger, heavier HGVs in the UK parc. Fleet replacement cycles for HGVs, ships, rail locomotives and aircraft mean that fossil fuel powered vehicles being purchased now will remain in use for lengthy periods of time. Uncertainty about future net zero fuel sources, new fossil fuel vehicle phase out dates and concern about stranded assets mean that this situation will persist for a considerable period of time (Allen and Piecyk, forthcoming).

An Electric Road System (ERS) offers the greatest potential for reducing HGV electricity demand compared with using battery-electric heavy HGVs (which would require enormous increase in depots electricity supply and related costs and delays of achieving this) or hydrogen (due to expense of producing green hydrogen) (Ainalis et al., 2020). However, ERS would require government commitment and support to enable the construction of the infrastructure required for this solution to proceed.

There is currently a lack of strategic policy and supporting guidance to enable the infrastructure upgrades for goods vehicle depots, distribution centres and warehouses (and other buildings they operate to and from) for EV charging to take place at costs that are affordable to freight transport and logistics operators and within timescales that are realistic for these vehicle operators. National Government and its regulatory body Ofgem need to work with and develop regulations for National Grid, DNOs and other relevant bodies to ensure that EV charging at logistics facilities can take place at reasonable costs and in sensible timescales to make vehicle upgrades viable from an economic and operational perspective. This will also involve putting in place suitable planning policies to assist tenants of such buildings to gain permission for such upgrades from the owners and to ensure that punitive lease clauses cannot result in costly charges to tenants at the end of their leases to remove infrastructure tenants have funded to support freight and logistics decarbonisation and operational efficiency (Allen and Piecyk, 2023a).

There is currently a lack of policy regarding decarbonisation for new logistics and freight transport buildings (e.g. warehouse, distribution centres, depots etc.) through national policy or through the planning application system. Nor has there been government action on the decarbonisation of existing logistics and freight transport buildings (or other commercial buildings to and from which goods vehicles operate on a regular basis) (Allen and Piecyk, 2023a; Turley and the ILSB, 2023).

There is a lack of suitably strong national strategic support for additional rail freight interchanges and terminals as well as measures to prevent substantial delays to planning
applications for such facilities. This is also the case for inland waterways. Ports and airports require further government planning support in terms of decarbonising their fuel supplies to support visiting vehicles (ships and aircraft), ground handling equipment and to power operations at on-stie buildings (Decarbonising UK Freight Transport project, 2023).

There is a need for closer working between UK government departments on freight transport and logistics decarbonisation and supply chain resilience due to climate change risks (other than in public consultation work about planning and logistics resulting from the Future of Freight Plan between the Department for Transport and the Department for Levelling Up, Housing and Communities). Responsibility for freight decarbonisation has seemingly been largely left to the Department for Transport (based on the Transport Decarbonisation Plan and Future of Freight Plan both published by the Department for Transport). Other departments including the Treasury (HMT), the Department for Energy Security and Net Zero (DESNZ), the Department for Business and Trade (DBT), the Department for Environment, Food & Rural Affairs (Defra), the Department for Levelling Up, Housing and Communities, and the Cabinet Office have important roles and responsibilities in relation to freight and logistics decarbonisation (Allen and Piecyk, forthcoming).

The Department for Transport needs to improve data collection and analysis to understand road freight transport operations and those of other freight modes to better understand their operational efficiency and GHG emissions and use this data to closely monitor these. Department for Transport should work closely with other UK Government departments to ensure that data analysis concerning GHG emissions from freight transport and logistics buildings and the importation of goods are also included to ensure that consideration is taken of the entire supply chain for goods consumed in the UK (Allen and Piecyk, forthcoming).

Only a proportion of LGV operations are involved with goods delivery and collection (with servicing activity, commuting and private use also important trip purposes). The lack of data concerning LGV operations (for goods delivery and collection and service provision) severely affects the ability to estimate the relative importance of these varying LGV activities and the efficiency of these operations. Given the scale of LGV activity and its growth over recent decades, the UK Government should put far greater effort into achieving better understanding of the work carried out by these vehicles and the GHG emissions of their various uses (Allen and Piecyk, forthcoming).

Greater consideration needs to be paid by policymakers to SME freight and logistics operators to ensure that they are in a position to be able to upgrade their vehicle fleets and depots to net zero given the capital costs and the lack of finance arrangements that these businesses can access (Allen et al., 2023).

Rather than largely focus on the 2050 net-zero target and view zero-fuel vehicles as the main solution to achieving this, policymakers and other stakeholders should focus on the shorter-term in order to meet UK Government GHG emission reduction targets by 2035 and 2040 with respect to freight and logistics. Policymakers should encourage and work with businesses to implement the most viable short-term actions and measures which improve asset utilisation, operational efficiency, vehicle energy efficiency and make best use of transitional lower carbon vehicle fuels if GHG emissions from freight transport are to be reduced in the next 10-15 years in line with UK Government GHG reduction targets. Several transitional actions are currently available and are often attractive from a financial as well as a sustainability perspective and can improve the energy efficiency per unit of goods transported, handled or stored through measures. These include vehicle and building energy efficiency technology, vehicle and building maintenance, improvements in driver/worker behaviour, collaboration between supply chain partners, and better use of data in freight transport and logistics operations and supply chains (Allen and Piecyk, forthcoming).
In terms of online shopping and last-mile deliveries, policymakers need to become more familiar with the freight operations and efficiencies as well as the logistics buildings and infrastructure needs of the various sectors involved in this industry. This will help policymakers to improve planning guidance, local planning decisions and the direction of infrastructure support in relation to this industry. Microhubs, locker banks and pick-up and drop-off locations have a role to play in the decarbonisation of parcel last-mile deliveries, facilitating the use of electric vehicles including cargo bikes. However, policymakers need to become more familiar with customer and operator behaviour in order to ensure that decisions made are appropriate and effective (Allen and Piecyk, forthcoming).

It is important that in considering active travel (i.e. the encouragement of cycling and walking) and the infrastructure changes associated with this that policymakers at national, regional and local levels pay due care and attention to the road space and kerbside needs of freight vehicles in making deliveries and collection in urban areas. The vast majority of goods movements in urban areas will continue to be made by HGVs and LGVs for the foreseeable future and without such careful policy consideration the operational efficiency, cost and GHG emissions of these vehicles will potentially deteriorate (Allen and Piecyk, 2022).

**References**


**Question 9**
What more could local plans and decisions do to facilitate the supply of high-quality HGV parking and driver facilities?

**SRF response:**
SRF work has identified numerous recommendations for improving the understanding, planning and provision of overnight HGV parking facilities. It has also suggested ways in which freight vehicle driver and rider welfare could be improved more generally, including consideration of the toileting, washing, and waiting needs of those working in urban areas in the so-called ‘gig economy’ (see Allen and Piecyk, 2023c).

This includes various strands of research that are required to better understand HGV overnight parking to plan for future provision. This includes driver choice and behaviour, as well as facilities provided, pricing and occupancy rates at lorry parks. Further up-to-date understanding of who pays for the use of a lorry park, the method of payment, and the effect of this on driver parking location choice is also needed.

Better understanding is required by policymakers of the safety, security and traffic congestion impacts of HGV overnight parking in lay-bys and on-street in industrial estates to help enforcement agencies ensure that unsafe and inefficient practices are avoided at various locations and that drivers and other road users are not placed at undue risk.

Planning objections from local residents are often an important factor in the delay and rejection of planning applications for new and extended lorry parks. Research is needed to understand whether these objections by local residents are based on objective traffic safety risks or wider, more subjective, concerns about having goods vehicles travelling in their locality. Consideration is necessary as to whether in the case of strategically important lorry park infrastructure alternative national approaches to such planning applications are required.

Research is also required into whether HGV drivers are having to drive additional mileage to find overnight parking spaces (due to the shortage of them) and thereby adding to HGV mileage and its traffic, social and environmental impacts. Similarly, efforts to find overnight parking space or decisions by drivers to drive for less time than driver’s hours permit due to their concern about finding somewhere to park may be having impacts of the efficiency and operating costs of long-distance road freight transport. This could be resulting in the need for more HGVs to be operating on the roads and for more HGV mileage to be travelled than would be necessary if overnight parking space was more readily available.

The business model for lorry parks does not appear to have been working well for several decades. This is due to a number of factors including land acquisition costs, the redevelopment value of lorry park sites for other more valuable uses (such as residential development), major difficulties in obtaining planning permission for lorry parks and the cost of doing so, and the price that HGV drivers and the road freight industry is willing or able to pay for lorry park services (especially given the industry’s low profit margins). These issues
need to be addressed in joint efforts between the UK Government, local government, lorry park developers and operators, the users of lorry parks (road freight transport businesses and other businesses employing drivers and paying for drivers to use lorry parks), and insurers and shippers of goods.

Action taken by the UK Government and local authorities to impose Traffic Regulation Orders (TROs) on HGV overnight parking in lay-bys and on-street in industrial estates, whilst not at the same time increasing the provision of alternative facilities, is penalising drivers and road freight businesses with fines and operating disruption without resolving the overnight parking shortage. Such action in Kent and other regions under particular pressure with parking availability is likely to add to the HGV driver shortage, making driver retention and recruitment increasingly difficult (Piecyk and Allen, 2021).

The provision of more overnight HGV parking spaces in lorry parks will clearly require substantial funding and questions remain about how these costs are to be met. Based on the existing business model for lorry parks, it is unlikely that lorry park providers will want or be able to supply all the additional provision that audit surveys commissioned by Government have indicated is necessary. It is therefore important the national and local government and businesses discuss how this is to be afforded, and risks and benefits shared.

The UK Government should proceed with reforms to the existing planning framework as it has promised. However, these must go beyond minor word changes and vague sentences added to the National Planning Policy Framework (NPPF), the circular on the SRN and HGV parking provision and other guidance for local planning authorities in England to consider when dealing with planning applications for lorry parks as has happened in the past (and more recently in 2021 and 2022). There is no need for yet another assessment, survey or consultation. The difficulties and problems are clear. The Government should proceed now with recognising lorry parks as key national infrastructure assets and putting in place the measures and resources to support them and increase their capacity.

In order to “ensure that decisions for new driver facilities are not left to individual planning authorities” the Government should carry out wide ranging changes to NPPF, the circular on SRNs and lorry parks and guidance to local authorities informing them that lorry parks are key national infrastructure assets and that therefore planning applications for them must be treated as essential and necessary, with timely outcomes. NPPF and this guidance should set out the HGV parking capacity and facilities that should be made available. Alternatively, the Government could take direct responsibility for such planning applications given their national importance, making timely decisions that reflect this.

The updated Department for Transport circular on the Strategic Road Network has noted the need for more HGV parking space at lorry parks at certain times, and has stated that lorry parks cannot be closed unless it has been “clearly demonstrated that a need no longer exists” and that National Highways “will work with relevant local planning authorities to ensure that local plan allocations and planning application decisions address the shortage of HGV parking on or near to the SRN”. However, the means by which this will be achieved have not been explained in sufficient detail.

The UK Government should ensure that all its relevant departments with an input to lorry park provision (including the Department for Transport, and the Department for Levelling Up, Housing and Communities) are working closely together on necessary planning reform and it should put in place targets for the next 5 and 10 years for the provision of additional lorry park capacity that will be delivered, for overnight lorry park utilisation and for the proportion of all HGVs that park in lorry parks overnight (i.e. taking account of those vehicles parked in lay-bys and on-street in industrial estates), and then compare these targets with the results of the lorry
park audits it commissions. These lorry park audits should be commissioned more frequently than in the past (2011, 2017 and 2022) to check on progress.

The UK Government should also require regional transport bodies and local authorities to pay proper regard and attention to the need for lorry parks, including the identification of suitable sites for new lorry park provision close to industrial estates and away from residential areas. These should be identified in Local Plans.

New warehouse and distribution centres and logistics parks should have daytime and overnight HGV parking capacity and facilities included as a planning condition, with off-street space made available to vehicles making deliveries and collections that can arrive well in advance of their planned arrival times so that they do not miss these slots and incur commercial penalties. This requires the implementation of a new methodology for calculating HGV trip generation in planning applications for logistics developments (as it is usually underestimated leading to too little HGV parking/waiting space being designed in to development). Enforcement of such regulations with appropriate penalties for failure to do so would be required in order to ensure compliance.

In 2022, the UK Government announced that it “does not at this stage intend to set up a Government-Industry taskforce” to address these HGV parking problems and wider driver welfare issues despite being urged to do so by the Transport Select Committee. It referred instead to ‘working closely’ with Logistics UK, National Highways, the Chartered Institute of Logistics & Transport, Transport Focus and other industry stakeholders. The Government should reverse this decision and put in place such a public-private sector partnership to ensure that the changes made to the planning system for lorry parks and HGV parking will have their intended consequences.

The UK Government put in place a revised minimum standard requirement for security, toilets/showers, cooked hot food facilities, Wi-Fi and device charging availability, and provision for showers and washing facilities for female drivers at lorry parks in December 2022. These relatively minor changes made to the minimum requirements for lorry park facilities do not go far enough as they do not specify the quality of facilities required, only that certain facilities exist. Also, some drivers choose to use lorry parks with few facilities due to them being cheaper than those with more facilities. Therefore, the government needs to give more thought to requiring differing quality of facilities at various lorry parks, rather than simply requiring a basic minimum standard of facilities at all lorry parks. More thought needs to be given by Government as how to encourage the 34% of HGV drivers who were observed to park overnight in lay-bys and on-street in industrial estates in the 2022 audit to use lorry parks, and for some of these drivers the price of overnight lorry parks is the main reason they choose not to do so.

There is substantial scope to improve the capture and dissemination of HGV parking availability data. This should take the form of both the gathering of parking space data in lorry parks using cameras or sensor pads in parking bays, as well as the systematic provision of this data via mobile phone apps and variable message signs (VMS) at the roadside provided drivers with information about local parking space availability on the roads they are using. Such parking data gathering and dissemination would assist HGV drivers to find such space and prevent them from having to park in lay-bys and on-street in industrial estates. It would also reduce the additional mileage involved in drivers searching for a lorry park space, or the inefficiency (and associated vehicle fleet and vehicle kilometre impacts) of stopping driving sooner than necessary. There is an important role for national Government to work with private lorry park operators and local authorities in the acquisition and provision of this parking information to HGV drivers and their employers.
Opportunities to extend existing and introduce new networks in which freight transport operators and other businesses with suitable provision make their off-street parking space and facilities available (such as SNAP and the Transport Association) should be investigated and supported by policymakers. Government and trade associations should work together to identify further opportunities for and promote open and closed collaborative networks in which off-street HGV parking space is made available to other HGV operators and drivers to increase the capacity of parking facilities both quickly and relatively inexpensively.

References


Question 10
How can planning policy in England help to support the freight and logistics sector across the whole of the UK?

SRF response:
SRF research has identified the potential role that could be played by an Electric Road System (ERS) in providing the means for decarbonisation of the vast majority of long distance HGV journeys on the Strategic Road Network across the UK and serving warehouses, depots, factories in close proximity to it as well as other sites located in urban areas (Ainalis et al., 2020).

SRF work has also identified current shortcomings in strategic planning for freight transport and logistics at national, devolved administration, regional and local levels including the interactions between these levels of government. It has also provided suggested actions to help overcome these difficulties (Allen and Piecyk, forthcoming). These are discussed below.

There is a need for greater integration and effective inter-departmental working within UK government in order for improved national strategic planning and guidance for freight transport and logistics infrastructure, operational efficiency and decarbonisation to be achieved (including interactions between freight vehicles, terminals and modal transfer points (i.e. seaports, airports, rail terminals and river wharves) and buildings (warehouses, distribution centres, depots, hubs etc.) The Future of Freight Plan and Transport Decarbonisation Plan reflect little consideration of joint departmental working on these issues and many of these issues lie outside the control of the Department for Transport.

Devolved administrations and other tiers of government in the UK typically have a similar lack of integrated, effective inter-departmental working to that in the national UK government.

The corporate, collective memory in government departments is often poor due to lack of staff with deep, specialist knowledge and high staff turnover. Lack of specialists often leads to civil servants having few relationships outside the organisation with external experts. This can lead to poor selections by civil servants when accessing information, such as obtaining opinions and advice from lobbying and campaign groups, think tanks, and media organisations that lack robustness. This can adversely affect the quality of the advice that civil servants provide
to ministers and the strategy and policy formulation that ministers release. The same problem of churn of personnel has also been taking place among ministerial positions. Many politicians and civil servants in national government, even those in transport roles, often have little pre-existing knowledge about freight transport and logistics. Civil servants and politicians at all levels of government would benefit from training and education about the importance and functioning of freight transport and logistics operations and supply chain management.

The UK national government, devolved administrations, regional agencies and local authorities need to work closely together to avoid policy conflicts between different tiers of government. Given its resources and seniority, the UK national government needs to take the lead in terms of putting in place a coordinated structure and approach for inter-governmental working, making clear the roles of these other levels of government. Civil servants responsible for freight transport and logistics in UK national government need to take the lead in developing engagement with their counterparts in these other tiers of UK government.

The UK national government needs to be responsible for assisting with the on-going resourcing of freight transport GHG research, trials and implementations across all tiers of government in the country, as well as for putting in place multi-channel mechanisms for the sharing of policy objectives and information and learning between tiers of government.

There is also an important need for the UK Government and other tiers of government to work closely with the freight transport and logistics industry in order to develop its strategies and policies and devise workable solutions. This includes forming and fostering ties with freight and logistics operators, as well as manufacturers, retailers, wholesalers and other businesses using and operating freight transport and logistics operations.

There is also an important need for active travel policies at the national, regional and local level to be devised and designed with the needs of freight transport and logistics and hence loading and unloading (as well as servicing operations) taken account of. Policymakers at all tiers of government need to better understand road freight transport and logistics operations and the constraints within which they have to function (imposed by both customer requirements, policymaker regulations and the physical infrastructure available in space and time) in order to devise strategies and policies by which the efficiency and sustainability of these operations could be improved.

References

