

Consultation Response: Freight, logistics and the planning system: call for evidence

Closes: 6 October 2023

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?

In response to this question, you may want to think about:

- **how this varies between different local planning authorities**
- **whether the location of allocated sites appropriately meets the needs of the sector, particularly in terms of good accessibility to the transport network**
- **any feedback you may have received following the submission of a site through a call for sites process**
- **what site constraints typically prevent development of land for freight and logistics infrastructure**
- **the extent to which local plans focus on warehouse and distribution infrastructure provision at the expense of other infrastructure and operational considerations required by the freight sector**
- **the level of data, information and evidence available to local planning authorities to determine the supply and demand needs for space**
- **any feedback you may have received when promoting sites for allocation in plans**

Is there anything else that you consider relevant?

The effectiveness of local plans for identify development needs and allocating sites depends on the evidence base sitting behind policies. The PPG currently provides some guidance for LPAs and consultants carrying out their Employment Land Review (ELR) however this is currently combined with assessments of housing land availability (see PPG section [Housing and economic land availability assessment](#)).

Therefore, the degree of focus on employment and industrial floorspace requirements in such studies may vary, and consequently the detail on freight and logistics as a sub-sector of class B8 Storage and Distribution may also vary. Therefore, providing more guidance on how to prepare evidence for this sector would be of use, including servicing and rest facilities. The geographical scale at which evidence is collated should also be considered, as freight and logistics is a strategic matter best dealt with at a regional or national level.

Some LPAs prepare optional evidence base to support a tailored approach to employment policies and allocations within their local plans, such as through commissioning related economic strategies or surveys to fully understand the local

economy. Whilst this is optional the degree of coverage, and thus scope of policies will also differ. Therefore, policies can be found sound without having very detailed or locally specific context to support particular sectors or sectors of growth or opportunity.

With regard to land allocations for freight and logistics, the LPAs are often largely restricted to sites which have been submitted to them through Call for Sites processes, which may not be the most suitable location for such uses. The ELR should assess existing parcels of employment land in relation to their suitability and access to the strategic road or rail networks, with a view to understanding their quality and function. However, this picture may well be better completed across the whole of the LPAs area (regardless of whether sites are already or have been put forward for such development) and integrated across a regional or national level. Regional assessments of the most suitable and appropriate locations for such freight and logistics uses would be very helpful for each LPA, to translate and build upon in their respective evidence base. Sub-national transport bodies such as Transport for the South East (TfSE) are well placed to advise on this in partnership with local highway and transport authorities. Better engagement and collaboration with TfSE would be helpful to achieve this.

Question 2

How effectively are the policies in [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?

In response to this question, you may wish to think about:

- **whether existing planning policies and guidance are clear, consistent and have their intended impact**
- **how the needs case for freight and logistics is being considered at a local level, particularly where that case has regional or national significance**
- **the effect on the freight and logistics sector in relation to its efficiency, reliability, resilience and environmental sustainability**

Is there anything else that you consider relevant?

The policies in the NPPF (Chapter 6) and the PPG are not very detailed or comprehensive when it comes to non-residential uses, and do not adequately distinguish between freight and logistics and other employment land requirements. Further direction on how to effectively plan for these uses would be helpful.

Alike residential freight and logistics should be directed towards the most appropriate location which needs to be done at a higher than local level. Planners and policy-makers should therefore be given the tools within the planning system to support the most appropriate use for the location, regardless of the uses put forward by the land-promoter. Otherwise, with a focus on housing delivery the most sustainable and

appropriate sites for freight and logistics could end up being put forward for residential. However, it is also understood that the land values for freight and logistics have increased rapidly in a short space of time, in some cases outstripping that of residential. This will have an influence on the take-up of land for such uses but should also be planned for in a sustainable way, but reinforces the need for uses to be planned for at a strategic level.

Question 3

How effective is engagement between industry and local authorities in the course of local plan making? How can this be improved?

In response to this question, you may want to think about:

- **the effectiveness of demonstrating the in-principle need for freight and logistics, particularly at the regional or strategic scale**
- **options that exist to enable developers and planning authorities to better understand these needs**
- **examples of where local plans have successfully planned for the needs of freight and logistics including what they did and why it worked**
- **whether local planning authorities have access to clear guidance and training for officers on planning requirements for freight and logistics**

Is there anything else that you consider relevant?

Given the focus of call-for-sites processes on housing delivery the engagement between local planning authorities and promoters of land for freight and logistics is more limited.

A stronger emphasis on evidence-base gathering (particularly at a regional or strategic level) would facilitate better relationships between both parties. This would also enhance local planning authority skills in these areas.

Question 4

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

In response to this question, you may want to think about:

- **making sites more space efficient, supporting innovation of site usage, policy or planning conditions required to densify operations and challenges to deliver this**
- **the effectiveness of permitted development rights supporting the industry**

- **how easy has it been to achieve consent for change of use or densification of sites to facilitate freight and logistics operations**
- **the use of design codes in driving intensification and in accommodating appropriate compatible uses**
- **the role scale of development, function and consolidation of functions can play**
- **whether there are any circumstances where development could be located nearer than currently allowed to more sensitive use classes including residential**

Is there anything else that you consider relevant?

It is understood that due to rising land values for freight and logistics it is only now becoming viable to promote the intensification of freight and logistics uses. This would not normally be included as a typology for testing with the local plan viability assessment. Again, the focus of national planning policy has typically been on housing delivery, so a broadening of focus and an understanding of the wider context could enable more innovative thought. The NPPF does already promote the most effective use of land, but again mainly from a housing delivery perspective. This could be expanded to specifically include freight and logistics, and other non-residential uses.

It is understood that within London planning policies have been successful in delivering intensified employment uses alongside residential development. The incentive for landowners and developers is often the enhanced land value of residential when considering brownfield redevelopment options. However, for freight and logistics if no residential is to be delivered, and typically land is in much more abundant supply there is no specific incentive to intensify existing operations within the same location, normally opting for site expansion. Therefore, some further financial incentives may be required to bring forward such innovation on existing sites.

Question 5

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

In response to this question, you may want to think about:

- **how our sub-national transport bodies, transport authorities and local planning authorities can better align transport and spatial planning across authority boundaries to identify improvements to the local transport networks that support the seamless movement of goods**

Is there anything else that you consider relevant?

It is important that there is effective co-operation between all tiers of regional and local government in preparing plans and strategies, which should be aligned in terms of transport policy related schemes and land use.

TfSE has a Freight, Logistics and Gateways Strategy which identifies 'Increase Provision of Logistics Land and Property' as a strategic action. The related Strategic Investment Plan identifies related investment priorities. Local transport and highway authorities lead engagement with TfSE.

Kent County Council is in the process of preparing a new Local Transport Plan for Kent (LTP5). It is expected that any regional policy and sector requirements are expressed clearly at a county level in this plan, so emerging Local Plans can take any area specific/spatial requirements into consideration. It is understood that sector specific proposals such as rail/freight interchange, warehousing and servicing facilities can be controversial to deliver through the planning process. Issues can include the location, scale and related impacts of development proposals e.g. hours of operation, noise and traffic.

As above, the most effective means of understanding freight and logistics requirements and opportunities should be at the regional and county level, rather than local authority level.

Planning decision taking and the applications process

Alongside concerns about the need for proper consideration of freight and logistics in the plan making process of local planning authorities, there were also concerns raised during the future of freight engagement about the decision taking and planning application processes of local planning authorities.

Supporting the freight and logistics sector to deliver efficient, reliable, resilient and sustainable supply chains, requires access to the right type of sites in the right places.

If the planning system is to support freight and logistics sites there must be clear and consistent application of planning policy and guidance in the granting of permission to use sites, with the process by which planning authorities take their decisions being well understood and navigable by the sector.

The questions in this section relate to decision taking and seek to gather evidence on experiences of application and best practice for planning decisions involving freight and logistics developments.

Question 6

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

In response to this question, you may want to think about:

- **where planning applications were the subject of pre-application advice**
- **capacity and capability of local decision taking, particularly in reference to understanding of freight and logistics**
- **reasons for refusal**
- **perceptions of the planning application stage in terms of proportion of applications that are approved and refused**
- **examples of aborted applications or development**
- **appraisal of the quality of planning applications for freight and logistics submitted**

Is there anything else that you consider relevant?

Applications which have gone through the pre application will generally get a better result. It is important to have early engagement with local stakeholders. Regional guidance is imperative for the decision-making process because of the nature of this type of application.

The council currently has an application for HGV truckstop in the Green Belt and adjacent to AONB. No pre application was received on this case and the application is raising challenging issues which could have been dealt with at pre application stage. This is the first application of this type received in recent memory.

Questions relating to specific policy priorities

Supporting supply chains

The FoF is clear that the government recognises the crucial role played by the freight and logistics sector in supporting every supply chain into, across and out of the country. The FoF plan sets out how the national freight and logistics network is a part of a larger global system and how the domestic network ranges from large international gateways and warehousing and distribution hubs to residential delivery.

Planning is not the only lever available to enhance the freight and logistics network in England, but it is an important one. This section focuses on how planning can support supply chains.

Here local plan making and decision taking remain important – for example, facilitating last-mile delivery – but there is also a strong interest in understanding how to align the planning system with the needs of the freight and logistics sector at a regional and national level.

The government also committed, in the FoF, to identify a national freight network. We will work to develop a fuller understanding of the domestic freight network across road, rail, maritime, aviation, inland waterway and warehouse infrastructure.

This will start with developing a stronger data and strategic picture of the network before exploring how this could be consolidated into a national freight network. With this process, we want to understand the role a national freight network could have in the planning system.

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?

In response to this question, you may want to think about:

- **what are the priorities for improvement and what would need to change for those improvements to be realised?**
- **national, regional and local needs of the freight and logistics network and system**
- **how a national freight network could be recognised in national planning policy and the role the planning system could play to safeguard but also enhance key freight corridors and nodes in England**
- **the impact of the location of modal interchanges and distribution and storage hubs of different sizes within the freight and logistics network and system**
- **diversification, expansion, intensification of freight and logistics sites and operating restrictions – tension between efficiency and environmental impact**
- **the provision of land for freight and logistics in housing, office and retail developments including kerbside, delivery drop, and distribution hubs and the potential role for design guidance, nationally prescribed standards or standard conditions**
- **role of spatial and transport planning and local authorities in supporting adoption of innovative technology and operating models to grow and level up the economy**
- **mode specific regulation and guidance**
- **impact of freeports**

Is there anything else that you consider relevant?

Refer to answers to questions 1 to 6 above.

The decarbonisation of freight

The [Transport decarbonisation plan](#) sets the strategic direction with 78 commitments to put transport, including freight and logistics on an ambitious path to net zero by 2050.

The FoF prioritises the provision of net zero energy infrastructure and supporting modal shift by increasing the proportion of freight moved by rail, including the use of urban rail freight interchanges and other sustainable modes, such as cargo bikes, light rail and inland waterways.

The FoF also references urban and peri-urban freight consolidation centres, building on the commitment in [Gear Change](#). Achieving net zero in freight will require infrastructure and maybe facilitated by land use or operational changes.

Question 8

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

In response to this question, you may want to think about:

- how national planning policy and local plans and decisions can facilitate modal shift to low-carbon transport modes in urban, suburban and rural areas, including modal interchange, for example, rail freight interchanges
- how national planning policy and local plans and decisions can support the provision of zero emission energy infrastructure including charge points for, for example, large goods vehicle (LGVs) and heavy goods vehicles (HGVs) at freight facilities
- issues that impact specific modes including inland waterway and coastal shipping and air freight
- last-mile delivery including provision of consolidation centres, co-location of logistics and other land uses (for example, micro consolidation and distribution hubs operating from car parks) and mobile e-cargo bike stations
- how can distribution centres be located in more locations accessible by and connected to sustainable transport modes including public transport and the provision of cycle facilities

Is there anything else that you consider relevant?

These matters should be considered within the 15/20 minute neighbourhood principles. A re-focussing of town centre policy to support other ancillary uses rather than housing would be beneficial.

HGV driver parking facilities and welfare

The government is committed to ensuring the planning system plays its part to meet the needs of hauliers and addressing current deficiencies, including the allocation of land for lorry parking.

We recently published [DfT Circular 01 2022: strategic road network and the delivery of sustainable development](#), which explains how National Highways will engage with the planning system and addressing the requirements for roadside facilities, including HGV driver services. Nevertheless, there is more we can do.

Question 9

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

As above this should be dealt with strategically at a national or regional level.

In response to this question, you may want to think about:

- how the need for new and higher quality, more secure facilities (including adequate food, accommodation, toilet and shower facilities for men and women) can be conveyed to plan-makers and decision-takers and secured in the places they are needed
- how better HGV parking and driver welfare facilities can be delivered through the planning system at freight sites such as modal interchanges, distribution and logistics centres
- recognising the need for HGV parking facilities to be located close to the strategic road network or key road networks, what would help HGV parking facilities be better integrated into their surroundings and more acceptable to nearby local communities – how could these be encouraged through planning measures?
- how existing infrastructure (for example, vacant hardstanding land) can be better used through the planning system to accommodate HGV parking and what would unlock these sites

Is there anything else that you consider relevant?

A strengthening of the evidence base around freight and logistics could also include assessment of ancillary uses to support the effective operation of such uses.

Strengthening the Union

As a geographically distributed employer, the freight and logistics sector drives economic activity across the UK and contributes to both levelling up our economy and strengthening the Union. Government recognises that our national freight and logistics network is not constrained by internal borders – relying on all parts of the UK to be able to function effectively.

The following question seeks to identify opportunities in which the planning system in England can help to support the movement of freight across the UK and the delivery of shared infrastructure priorities of England, Scotland, Wales and Northern Ireland.

Question 10

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

In response to this question, you may want to think about:

- **the interconnectivity of the freight and logistics network across the whole of the UK**
- **any examples of planning policy drawn from England and the devolved administrations that impact upon freight, whether positively or negatively**
- **is there anything else that you consider relevant?**

No comment.