Draft Transport Noise Action Plan (TNAP)

30 January 2026

About Logistics UK

Logistics UK is one of the country's largest business groups, and the only trade association which represents all of logistics. Our mission is to support, shape and stand up for a safe, sustainable and efficient logistics sector. Our membership of more than 22,000 includes global, national and regional businesses and SMEs spanning road, rail, inland waterways, sea and air as well as the customers of freight services, such as retailers and manufacturers. We deliver services, representation and thought leadership, helping members and policymakers to seize new opportunities for the sector and the economy as a whole, right across the country.

The logistics sector

Nothing moves without logistics. The sector employs 8% of the UK workforce in good jobs with strong career progression, contributes £170 billion in GVA each year, and underpins the resilience of the everyday economy.

Logistics plans and coordinates the movement and storage of the goods that businesses, public services and households rely on – using ports, airports, roads, railways, waterways, warehouses and smart digital systems to tie it all together.

With the right policies, logistics can drive up UK growth by £8 billion a year.[1] However, rising costs, red tape and poor infrastructure are holding the sector back – putting firms out of business, fuelling inflation, and undermining productivity and supply chain resilience. As a result, the UK has fallen from 4th to 19th in the World Bank Logistics Performance Index over the decade to 2023.

1: Do you consider there has been anything left out of the Transport Noise Action Plan?

While the TNAP provides a comprehensive overview of the impacts of transport noise, the plan would benefit from a stronger acknowledgement of the critical economic role of freight transport and the need to carefully balance noise management with maintaining the efficiency of Scotland's strategic logistics corridors. Freight movements on routes such as the M6/A74(M), West Coast Mainline and key port access roads are essential to national supply chain resilience and to Scotland's economy. A noise strategy should therefore ensure that any interventions do not inadvertently reduce freight capacity or compromise the reliable flow of goods across Scotland.

In addition, the TNAP is weighted towards reducing transport noise at source but gives comparatively less consideration to land use planning and mitigation of existing noise environments. Greater emphasis should be placed on applying planning principles to prevent sensitive land uses,such as housing,being located adjacent to long-established logistics sites, including ports, rail terminals, trunk roads, depots and industrial facilities. This aligns with good practice around futureproofing strategic infrastructure and avoiding unnecessary conflicts between freight operations and new development.

Finally, the plan should explicitly recognise that in many places, damaged road surfaces contribute more to noise than freight vehicles themselves. A robust and proactive approach to road maintenance would support both noise reduction and network efficiency, consistent with the TNAP's emphasis on managing noise across the transport system.

[1] Logistics Delivering a solution to the UK's productivity puzzle, Oxford Economics, 2023

2: Is there anything you consider should be discussed at the Transport Noise Action Plan Steering Group during the next 5 year cycle for Round 5?

The Steering Group should ensure systematic and early engagement with the freight and logistics sector so that noise interventions do not unintentionally reduce network capacity, restrict access to vital routes, or undermine the efficiency of freight operations.

Given Scotland's freight decarbonisation pathway, the Group should also consider how noise policies interact with the introduction of heavier zero emission HGVs, which may have different acoustic profiles and operational requirements compared with existing fleets.

In addition, future discussions should assess how road maintenance practices, resurfacing standards and material specifications influence noise generation, ensuring alignment with quieter surface research referenced in the TNAP.

3: Do you have any views on the long term opportunities to better address Scotland's needs for managing transport noise?

There is a strong long-term opportunity to align noise policy with Scotland's freight decarbonisation and net zero transport strategies. Logistics UK recommends that the TNAP embed the Agent of Change principle – ensuring that new developments near strategic freight corridors or sites are responsible for mitigating their own exposure to existing noise. This would safeguard critical infrastructure that is vital for Scotland's economy.

The long-term approach should also prioritise high quality road surfaces, as poor condition surfaces significantly amplify noise from all vehicle types. Improved and consistent resurfacing programmes would deliver durable noise reduction without compromising freight efficiency, and supports a systemwide, evidence based approach.

4: Are there any other comments you wish to provide in relation to transport noise or the Transport Noise Action Plan?

Logistics UK supports an evidence based and proportionate approach that balances environmental objectives with the operational needs of freight transport. To achieve effective, practical interventions, freight operators should be engaged during the assessment and prioritisation of Candidate Noise Management Areas (CNMAs), ensuring that solutions reflect local network realities and deliver best value.

It is also important to recognise that certain noise focused interventions designed for standard road vehicles—such as quieter tyres—may not be suitable for specialist or heavy duty vehicles, including those operating in quarries, construction, forestry or other offroad environments. The TNAP should therefore incorporate a flexibility framework acknowledging the diversity of vehicle types and operational contexts.

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