Proposed reforms to the National Planning Policy Framework and other changes to the planning system

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Summary

- Logistics UK welcomes the increased recognition of the importance of our sector in the revised National Planning Policy Framework (NPPF), however there are areas in which this could be strengthened further.
- The NPPF is a critical part of the planning system, but it must be supported by effective policies at national and local levels to create a supportive planning environment for logistics.
- Logistics must not just be considered as a sector in its own right, but as critical infrastructure for all developments and planning decisions.
- Any changes to planning fees must be justified, transparent and bring real improvements to the efficacy of the system.

About Logistics UK

Logistics UK is one of the country's largest business groups, supporting, shaping and standing up for safe and efficient logistics. We are the only organisation representing the entire logistics sector.

We represent a sector delivering an increasingly innovative, productive and sustainable system of essential national infrastructure. This system ensures the availability of the products that households, businesses and public services rely on every day, and is supporting the UK's transformation for the future. Our membership of over 21,000 includes global, national and regional businesses and SMEs spanning the road, rail, sea and air industries as well as the buyers of freight services, such as retailers and manufacturers.

Overall response to consultation

There is a widespread view among the logistics sector that the planning system is not universally effective at recognising the importance of logistics to local and national supply chains, allocating sites for further development and protecting existing sites and infrastructure.

At a national level, the NPPF has not previously been strong enough in affording these protections, which has led to this discontent, while there also exists a substantial degree of disconnect between the various strategic and operational levels of the national and local planning system. While the current NPPF both recognises the importance of sustainable transport, including freight, and encourages local authorities to identify sites for logistics, the implementation of these aims at a local level is often inconsistent and conditional on local authorities' support for, and understanding of, the freight and logistics sector.

There are also substantial gaps in the suite of national policies that should guide planning for logistics. The lack of a National Policy Statement for airports is one such example and has contributed to delays and indecision surrounding the expansion and re-opening of airports for freight use. Similarly, as Logistics UK has noted elsewhere, the Government

does not have a clear and defined set of strategic objectives for the UK transport network, which leads to short term and inefficient infrastructure planning[1].

To improve this situation, the Government needs to progress the development of a National Freight Network as committed to in Future of Freight. This network must identify the key routes, hubs and nodes for freight movements, as well as setting out how transport and energy infrastructure needs to adapt to meet economic and decarbonisation ambitions. Alongside this, Government must then establish a strong statement within national planning policy about the economic importance of the freight sector and set out a clearer requirement for local plans to provide sufficient land allocations for warehousing and logistics.

The proposed wording for the revised NPPF goes some way towards this, but as is set out later in this submission, there are areas where strong wording in support of logistics is needed. A revised NPPF should sit alongside a suite of policies that both cover and support integration between all logistics modes. A presumption in support of logistics developments, providing certain criteria are met, would provide certainty for the sector and help to speed up the planning process.

There must also be a greater degree of consistency in the application of the NPPF and associated guidance at a national level. Logistics UK members operating across a number of different planning authorities have reported wildly differing approaches when it comes to considering applications for new logistics sites. While there will always be a need for a degree of local determination in the planning system, this currently fails to give adequate consideration to the broader economic benefits of logistics developments.

The provision of safe, clean, and secure lorry parking and driver roadside facilities is an essential requirement for the logistics industry. While there has been some progress in recognising and beginning to address this issue, there is still much to do in order to address the substantial shortage in parking and facilities, with changes to the planning system central to this.

Lorry parks and traffic are viewed negatively by communities and there are a number of barriers to commercial delivery of lorry parking. The main issue identified by external reviews has been that of planning, which mirrors the feedback Logistics UK has heard from its members. This can be a result of local objection to applications and is reflected in a low number of approvals by local planning authorities. The time for a planning decision to be reached on a site can also be protracted and expensive. These planning barriers are preventing investment.

These findings must be acted upon, including addressing failures in the planning system and more dual use of sites to encourage investment. This should include a duty for unused land in public ownership to be considered for lorry parking where it is suitably connected to the transport network, alongside certainty and longevity on leases for truck stop tenant operators on public sector land. At the same time, the government must encourage planning authorities to implement existing guidance for providing adequate lorry parking.

At a national level, it must be mandated that the planning process for National Infrastructure Projects and route network upgrades includes a requirement to review the need for lorry parking facilities within the development, and to provide sufficient capacity. In granting permission for new or improved service areas there must be a requirement for an increased number of parking spaces, alongside improved security and standards for lorry parking, with this to be prescribed in revised Government guidance.

Therefore Logistics UK does not feel that the proposed changes to the relevant wording in the NPPF go far enough. Instead of focusing solely on the potential negative externalities caused by a lack of lorry parking, there instead must be a greater emphasis on the duty on planning authorities to provide a safe working environments for drivers.

We also urge the government to give serious consideration to the work of the industry-led, DfT Task and Finish Group on the issue of lorry parking, of which Logistics UK is a member. The group will be making a separate and detailed response to the consideration and Logistics UK endorses its recommendations.

[1] https://committees.parliament.uk/writtenevidence/123281/html/

Responses to specific questions

Question 5
Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?

Logistics UK agrees with this change in focus, as it aligns with the need for well-planned, efficient logistics infrastructure that supports the flow of goods and services across the country. A greater emphasis on spatial visions in local plans can help ensure that logistics considerations are integrated into the early stages of development planning. This integration is essential to avoid future conflicts between residential and industrial uses, and to ensure that logistics networks can operate effectively within high-density areas and new communities.

As the sector evolves in response to technological developments and changing consumer demands, it is vital that design codes are flexible enough to accommodate innovations in logistics, such as the requirement for electric vehicle charging infrastructure, autonomous delivery systems and other sustainable last-mile delivery solutions. Therefore, we support the move towards design codes that not only align with spatial visions but also demonstrate engagement with, and an understanding of, the changing nature of logistics. However, this is caveated with the need to ensure that any high-density developments are supported by new infrastructure that is of sufficient quality and capacity to enable the logistics flows these communities will rely on.

Question 6
Do you agree that the presumption in favour of sustainable development should be amended as proposed?

The proposed amendment appears to offer a more nuanced approach to sustainable development. The logistics sector is fundamental to the UK economy, enabling the timely and efficient movement of goods and services. However, the sector also recognises the importance of reducing environmental impacts and contributing to the UK's broader sustainability goals.

In relation to industrial developments, it is essential that critical economic activities, including logistics, can continue to function while also meeting high standards of environmental stewardship. The proposed changes must support a planning system that is agile and responsive to the needs of both the economy and the environment, particularly in relation to logistics infrastructure. This includes considerations for reducing carbon emissions, enhancing energy efficiency and integrating sustainable transport options to reduce congestion.

Any amendment to the presumption should allow for a balanced assessment of the benefits of proposed developments, considering the economic and social value they bring alongside their environmental impact. This balance is vital for ensuring that logistics operations, which are essential for maintaining supply chains and supporting businesses and consumers, are not unduly constrained by overly rigid sustainability criteria.

Question 12
Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

Given the interconnected nature of the logistics sector, which often operates across multiple local authority areas and regions, effective cooperation on cross-boundary and strategic planning matters is essential to ensure that businesses are not stymied by a patchwork of differing policies and approaches.

Logistics UK agrees that the NPPF should be amended to further support and enhance effective cooperation on these issues. Cross-boundary and strategic planning are essential for creating a cohesive and efficient logistics network that can support the smooth movement of goods and services throughout the UK. Effective cooperation ensures that infrastructure projects, transport links and logistics hubs are planned and developed in a coordinated manner, reducing the risk of bottlenecks, inefficiencies and conflicts between neighbouring areas.

Strategic planning on a larger scale is crucial for addressing broader challenges such as decarbonisation, technological innovation and changes in consumer behaviour, all of which impact the logistics sector. By fostering better collaboration across boundaries, the amended NPPF must ensure that logistics is given due prominence within regional strategies and that land which could be best utilised for economically important logistics sites and infrastructure is protected.

Question 20
Do you agree that we should make the proposed changes set out in paragraph 124c, as a first step towards brownfield passports?

We understand the need to optimise the use of land, particularly in urban areas where brownfield sites offer significant potential for development. The logistics sector is increasingly focused on finding innovative ways to utilise land efficiently, especially in areas close to urban centres where demand for logistics infrastructure is high, or where consolidation on the outskirts of towns and cities is operationally effective.

For the logistics sector, brownfield sites often present opportunities to develop strategically located hubs that can enhance the efficiency of supply chains and reduce last-mile delivery times. Streamlining the planning process for these sites could unlock new opportunities for logistics facilities in areas where they are most needed, supporting both economic growth and sustainability goals. Logistics UK agrees with the proposed changes set out in paragraph 124c as a first step towards the introduction of brownfield passports. However it is critical that these are not just seen as a tool for pushing through new housing developments, but are instead used to bring forward all economically important sites in line with local and regional economic needs.

It is also important that these changes are implemented in a way that ensures brownfield sites are viable for development and that any challenges, such as site remediation or access issues, are adequately addressed. A balanced approach that considers both the potential benefits and the challenges associated with developing brownfield land will be crucial to the success of this initiative.

Question 28
Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?

There is a need for a balanced and strategic approach to land use planning that ensures land is released in the right places to support sustainable development. The logistics sector relies heavily on the availability of suitable land in strategic, well-connected locations to maintain and enhance the efficiency of supply chains across the country.

Logistics UK agrees that the proposals, which prioritise the release of previously developed and grey belt land while allowing local planning authorities to focus on the most sustainable development locations, are a positive step forward. This approach aligns with the industry's commitment to sustainable development and efficient land use, particularly in areas where logistics infrastructure can be developed or enhanced without encroaching on greenfield sites.

By identifying previously developed and grey belt land first, the proposals help to minimise the environmental impact of new developments and make better use of land that has already been utilised. This is particularly important for the logistics sector, where proximity to urban centres, transport networks, and consumer markets is critical for efficient operations. However, there is a need for a flexible approach in relation to allocating land for logistics. This flexibility is crucial for addressing the diverse requirements of the logistics sector, which may vary significantly depending on local conditions such as infrastructure availability, market demand, and environmental considerations. A holistic view of the of logistics developments is needed to ensure that the wider economic, social and environment benefits are weighed against often highly localised impacts.

Question 31
Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?

We appreciate the government's focus on ensuring that land use policies are adaptable to meet the evolving economic and development needs of the country. The logistics sector, being integral to the functioning of the UK economy, requires access to land in strategic locations that support efficient supply chain operations and allow for future growth.

Logistics UK supports the proposals to allow the release of grey belt land to meet commercial and other development needs through both plan-making and decision-making processes. The use of grey belt land, which often includes areas that are less environmentally sensitive than green belt land, provides an opportunity to develop critical infrastructure without the significant environmental trade-offs associated with greenfield sites.

However, the release of grey belt land should be carefully managed to ensure that it is done in a way that truly meets commercial needs and recognises there are many reasons why such sites may not be suitable or optimal for logistics. The triggers for releasing grey belt land should be clearly defined, transparent, and linked to robust criteria that assess both the need for development and the suitability of the land in question.

For the logistics sector, the availability of grey belt land in strategic locations, such as near transport hubs, major roads, and urban centres, can significantly enhance operational efficiency. Therefore, it is important that the triggers for land release consider factors such as connectivity, accessibility and proximity to existing logistics networks. Additionally, any release of grey belt land should be accompanied by appropriate infrastructure investment to ensure that new developments are well-integrated into the broader logistics network.

Question 62
Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?

Paragraphs 86 b) and 87 of the existing NPPF are particularly relevant to the logistics sector, as they pertain to the planning and development of economic infrastructure, including logistics facilities.

Logistics UK agrees with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF. The proposed amendments appear to better align with the needs of the logistics sector by providing clearer guidance on the planning and development of facilities that support economic growth. In particular, the changes seem to emphasise the importance of considering the locational requirements of different sectors, including logistics, which often rely on proximity to major transport routes, urban centres, and other key infrastructure.

The proposed changes to paragraph 86 b) acknowledge the importance of ensuring that policies are flexible enough to accommodate the varying needs of different economic sectors. This flexibility is crucial for the logistics industry, which operates in a dynamic environment where factors such as technology, consumer behaviour, and global supply chain trends can rapidly evolve.

Similarly, the amendments to paragraph 87 reinforce the need for planning policies to support the development of infrastructure that is essential to economic growth. For the logistics sector, this includes the provision of appropriately located sites that are accessible and well-connected to existing transport networks. By recognising these requirements, the proposed changes help ensure that the planning system supports the efficient movement of goods, which is vital for both businesses and consumers.

Question 81
Do you have any other comments on actions that can be taken through planning to address climate change?

Planning policies have a major role to play in addressing climate change, particularly in sectors like logistics that have a significant environmental footprint. The logistics industry is committed to reducing its carbon emissions and supporting

the UK's broader sustainability goals. To that end, we believe that several additional actions can be taken through planning to further address climate change.

Planning policies could incentivise the development of logistics hubs and distribution centres that prioritise sustainability through more supportive decision making. This could also include providing signposting and advice to improve applications for facilities that incorporate renewable energy sources, energy-efficient buildings, and sustainable materials.

Planning policies should also facilitate the development of infrastructure that supports a shift from road transport to lower-emission modes such as rail and waterways. Land must be identified and protected to enable the development of intermodal freight terminals and improved connectivity between different modes of transport. In urban settings, there should also be greater protection afforded to wharves and water access which could be used for water-borne freight.

Local authorities should be encouraged to work with the logistics industry to assess the feasibility of establishing urban consolidation centres where goods can be aggregated before final delivery. This can reduce the number of vehicles on the road, decrease congestion, and lower emissions in urban areas. Similarly a supportive planning environment could promote the development of micro-hubs within urban areas, allowing for last-mile delivery using low-emission methods such as cargo bikes or electric vans. This would help reduce the environmental impact of deliveries in densely populated areas.

Question 96
Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?

We understand the need for a well-funded and efficient planning system that can effectively manage the increasing demands of development across the country. However, the question of whether planning fees should be increased beyond cost recovery to fund wider planning services requires careful consideration, particularly from the perspective of the logistics sector.

Logistics UK believes that while it is important to ensure that planning services are adequately funded, any increase in planning fees beyond cost recovery must be justified, transparent, and proportionate to the benefits it delivers. Here are key considerations:

- Clear justification: Any proposal to increase planning fees beyond cost recovery should be accompanied by a clear and detailed justification of how the additional funds will be used to enhance planning services. It is crucial that businesses and applicants understand where their fees are going and what additional benefits they can expect.
- Performance metrics: There should be clear performance metrics tied to any fee increases, ensuring that the additional funding translates into tangible improvements in the planning process, such as faster decision-making times, enhanced service quality, and better support for complex applications.
- Impact on viability: Higher planning fees can impact the financial viability of development projects, particularly for logistics businesses that often operate on tight margins. It is important to ensure that fee increases do not disproportionately burden developers, particularly in areas where logistics facilities are needed to support economic growth.
- Balanced approach: Any fee increase should be balanced against the potential impact on investment and development activity. Logistics UK advocates for a measured approach that considers the economic implications for the logistics sector and ensures that fee increases do not deter essential infrastructure development.
- Targeted funding: If planning fees are increased beyond cost recovery, it is important that the additional funds are used to address specific areas where improvements are most needed. This could include enhancing strategic planning capacity, supporting sustainable development initiatives, or improving public engagement in the planning process.

- Fair distribution: Consideration should be given to how the funds are distributed across different areas and sectors. Logistics UK would support a system where additional revenue generated from increased fees is reinvested in a way that benefits the broader planning system, including the timely delivery of infrastructure and support for sustainable logistics development.
- Engaging stakeholders: Before any decision is made to increase planning fees beyond cost recovery, it is essential to engage with stakeholders, including the logistics sector, to understand their concerns and ensure that the implications are fully considered.
- Phased implementation: If fee increases are deemed necessary, a phased approach could help mitigate the immediate financial impact on developers and allow time for the planning system to demonstrate the benefits of the additional funding.

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