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

Summary

- Logistics UK supports the NPPF's shift to a clearer, rules-based framework and seeks explicit recognition of freight and logistics as critical national infrastructure underpinning growth, jobs and supply chain resilience.
- Logistics UK welcomes the strengthening of Policy E3 and urges firm national safeguards for existing logistics land.
- Logistics UK backs the embedding of logistics in plan-making by requiring Spatial Development Strategies and local plans to assess cross-boundary freight needs, identify and allocate strategic sites/corridors and prioritise locations with strong network connectivity.
- There is a clear need to prioritise enabling infrastructure for decarbonisation and resilience, including planning for grid capacity and zero-emission refuelling/charging, and to tackle the lorry parking shortfall through robust need assessments and clear delivery mechanisms.

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.

Consultation response

Summary

Logistics UK welcomes this comprehensive revision to the National Planning Policy Framework (NPPF) and supports the government's objectives to make planning policy clearer, more rules-based, and better aligned with growth priorities. The logistics sector, which contributes £170 billion to the UK economy and employs 2.7 million people, requires explicit recognition and protection within national planning policy to function effectively as critical national infrastructure.

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

Whilst we strongly support many proposed changes, - particularly enhanced support for freight and logistics development (Policy E3), strengthened cross-boundary cooperation, and the permanent presumption in favour of suitably located development - fundamental gaps remain. Most critically, the consultation fails to mandate adequate protection for existing logistics sites and infrastructure.

Detailed Responses to Consultation Questions

Chapter 1: Introduction

Question 5: *Do you agree with the proposed approach to simplifying terminology where weight is intended to be applied?*

Strongly agree. Standardising on "substantial" throughout improves clarity and reduces confusion arising from varied terminology. This aligns with the broader objective of creating more rules-based, predictable policy.

Chapter 2: Plan-making Policies

Question 6: *Do you agree with the role, purpose and content of Spatial Development Strategies set out in Policy PM1?*

Partly agree. Whilst we support the introduction of Spatial Development Strategies to address cross-boundary issues, Policy PM1 must explicitly require these strategies to:

- Assess and plan for logistics and freight infrastructure needs.
- Identify key freight routes, hubs and intermodal facilities.
- Consider future freight flows and connectivity requirements.
- Safeguard strategic logistics land.

The logistics sector operates across administrative boundaries; effective cross-boundary planning is therefore critical to maintaining a coherent national logistics network. Without these explicit requirements, logistics risks being treated as an afterthought.

Question 7: *Do you agree that alterations should be made to Spatial Development Strategies at least every 5 years?*

Partly agree. Five-year reviews are appropriate to maintain relevance, but alterations should be required where significant changes in freight demand or logistics infrastructure requirements occur, regardless of the five-year cycle. Infrastructure-led growth, particularly for logistics, may require more frequent updates.

Questions 11-13: *Preventing duplication of national decision-making policies (PM6), initiating plan-making (PM7), and evidence preparation (PM8)*

Strongly agree with preventing unnecessary duplication, though this must not prevent plans from addressing local circumstances that are specific to the logistics sector. We support streamlined evidence preparation but emphasise that evidence on logistics needs, including freight flow assessments, site requirements and infrastructure capacity, must be adequately resourced and should be prepared with industry input.

Question 12: *Do you agree with the approach to initiating plan-making in PM7?*

Strongly agree. The 30-month timeframe and use of project initiation documents should help accelerate plan preparation. However, this must be accompanied by adequate resources and expertise within local planning authorities to assess logistics requirements competently.

Question 14: *Do you agree with the approach to identifying land for development in PM9?*

Partly agree. PM9 should explicitly reference the need to identify land for logistics and freight infrastructure as part of meeting overall development needs, not merely housing. The procedural principles for site assessment should include criteria specifically relevant to logistics developments, including access to strategic road and rail networks, compatibility with surrounding land uses, availability of utilities and energy infrastructure, and capacity for future expansion.

Question 15: *Cross-boundary cooperation (PM10 and PM11)*

Strongly agree. Logistics operations frequently span multiple local authority areas. Strengthened expectations for cross-boundary cooperation are essential. However, implementation requires:

- Clear guidance on assessing sub-regional and regional logistics needs.
- Requirements for authorities to engage with logistics operators and trade bodies where appropriate.
- Formal mechanisms for resolving cross-boundary disagreements affecting strategic logistics sites.

Question 16-17: *Developer contributions (PM12)*

Partly agree. Greater certainty on expected contributions is welcome. However, Policy PM12 must recognise that logistics developments generate different impacts and requirements compared to residential schemes. Contributions should focus on:

- Highway improvements addressing freight vehicle movements.
- Sustainable transport infrastructure for employee access.
- Grid connections and energy infrastructure.
- Not penalising logistics developments for solving existing infrastructure deficiencies that benefit wider areas.

Question 18: *Setting standards (PM13)*

Strongly agree with preventing duplication of building regulations standards. However, we oppose any local energy efficiency standards that would increase costs and complexity for logistics buildings, which operate on tight margins. Standardised national requirements enable the construction sector to deploy energy-efficient technologies at scale more effectively than varied local requirements.

Questions 19-20: *Examining plans (PM14, PM15)*

Partly agree. The revised soundness tests should explicitly require examination of whether plans:

- Adequately assess logistics needs and allocate sufficient land.
- Protect existing strategic logistics sites.
- Address freight infrastructure requirements.
- Consider logistics in cross-boundary strategies.

Without these explicit requirements, examination may fail to address systematic failures to plan effectively for logistics.

Chapter 3: Decision-making Policies

Questions 21, 24: *Preparing and determining development proposals (DM1, DM3)*

Strongly agree with proportionate approaches, particularly for small and medium development. Pre-application engagement requirements should reflect the nature of development; logistics developments serving identified strategic needs should benefit from streamlined processes.

Questions 22-23: *Information requirements (DM2)*

Strongly agree that validation requirements must be proportionate. For logistics developments, transport assessments can often be the most significant requirement. These should be scaled appropriately - minor logistics developments should not require the same level of transport assessment as major schemes.

We support a regulatory approach to information requirements related to national decision-making policies, provided this creates genuine consistency and does not add unnecessary bureaucracy.

Questions 25-28: *Development viability (DM5) and Section 106A/73*

Partly agree. Viability assessments for logistics developments must recognise sector-specific characteristics:

- Lower development values compared to residential or commercial office uses.
- Tight operating margins.
- Long development timescales for strategic sites.
- Essential nature of logistics sites as economic infrastructure.

The benchmark land value approach must account for logistics land being valued as industrial/employment land, not just agricultural or existing use value.

Regarding Section 106A and Section 73, logistics developers rarely seek to reduce obligations post-consent. The key issues are delays in infrastructure delivery by third parties and changing technology requirements (e.g. grid capacity for EV charging). The process for modifying obligations should allow pragmatic responses to these circumstances without protracted renegotiation.

Question 30: *Relationship with other regulatory regimes (DM7)*

Strongly agree. This clarification is essential. Planning decisions should focus on land-use acceptability; detailed operational matters covered by environmental permits, HSE regulations, and traffic regulations should not be duplicated. This is particularly important for logistics where multiple regulatory regimes often apply.

Questions 31-32: *Intentional unauthorised development (DM8)*

Strongly agree. Strengthened approach to intentional unauthorised development is welcome and should help protect the integrity of the planning system. This is particularly relevant where logistics sites face pressure for alternative uses offering higher land values. Retrospective applications following demolition of logistics facilities should face substantial hurdles.

Chapter 4: Achieving Sustainable Development

Questions 34-35: *Spatial strategy and settlements definition (S2)*

Partly agree. Clear spatial strategies and settlement boundaries are welcome. However, the definition of settlements must not inadvertently exclude appropriate locations for logistics development, which sometimes requires locations outside traditional settlement boundaries due to land requirements and transport connectivity needs.

The policy framework must recognise that some forms of strategic logistics infrastructure serving wide areas legitimately require locations determined by network connectivity rather than settlement hierarchy.

Question 36: *Presumption in favour of sustainable development (S3)*

Partly agree. The revised presumption provides welcome clarity. However, it must be accompanied by clear recognition in policies S4 and S5 that logistics infrastructure constitutes sustainable development where it:

- Serves identified strategic needs.
- Has good access to transport networks.
- Supports economic growth.
- Is appropriately designed and mitigated.

Question 37: *Development within settlements (S4)*

Partly agree. The default "yes" to suitably located development within settlements is welcome and should support smaller-scale logistics facilities serving local needs. However, larger strategic logistics facilities often cannot locate within settlements due to land requirements, vehicle access needs and wider market considerations.

We particularly welcome the reappearance of brownfield passport provisions within Policy S4. Expediting permissions with simplified approvals for urban brownfield land is essential for protecting and expanding logistics spaces to meet the demands of e-commerce and digital service delivery. The growth of online retail and rapid delivery services requires a network of urban consolidation centres, micro-fulfilment facilities and last-mile delivery hubs located close to consumers.

The brownfield passport approach delivers multiple benefits beyond simply unlocking housing. For logistics, it enables:

- Development of urban logistics facilities that reduce vehicle mileage by locating closer to end consumers.
- Support for low-carbon last-mile delivery methods including e-cargo bikes, walkers and electric vans operating from local consolidation points.
- Creation of employment opportunities in local communities through warehousing and delivery operations.
- Decarbonisation of supply chains by reducing the distance goods travel and enabling modal shift to active travel for final delivery.

However, it is critical that brownfield passport provisions do not inadvertently prioritise residential development over logistics uses on suitable urban sites. The policy should explicitly recognise that logistics facilities on urban brownfield land constitute appropriate development supporting sustainable growth, particularly where they serve local and regional distribution needs.

Policy S4 must also not create bias against logistics developments on suitable non-brownfield land within settlement boundaries where brownfield sites are unsuitable or unavailable for logistics use due to configuration, access or contamination issues.

Questions 38-40: *Development outside settlements (S5)*

Partly disagree. Whilst S5 appropriately restricts development outside settlements, the categories of acceptable development must explicitly include:

- Strategic logistics infrastructure serving regional or national networks.
- Freight intermodal terminals.
- Lorry parking facilities.
- Infrastructure supporting freight decarbonisation (EV charging hubs, hydrogen refuelling).

The current draft's focus on development being "well-related to an existing settlement" is inappropriate for strategic logistics infrastructure, which must often locate according to transport network connectivity rather than settlement proximity.

The proposed policy around railway stations (S5(2)(i)) should explicitly recognise freight rail facilities and intermodal terminals, not just housing and mixed-use development.

Chapter 5: Meeting the Challenge of Climate Change

Questions 42-47: *Climate change policies (CC1-CC3)*

Partly agree. The enhanced focus on climate adaptation is welcome. However, climate policies must explicitly recognise:

- The logistics sector's critical role in decarbonisation requiring substantial infrastructure investment, particularly to reflect the increased weight and potential future reviews of dimensions regarding zero-emission vehicles to ensure infrastructure remains fit for current and future purpose and operationally efficient
- The need for grid connections and energy infrastructure for electrified logistics operations.
- The importance of protecting existing and potential logistics sites to enable modal shift from road to rail/water.
- The role of efficient logistics networks in reducing transport emissions.

Policy CC2 should give substantial weight to logistics developments that facilitate modal shift, reduce empty running or improve supply chain efficiency. The reference to "promoting sustainable transport" must encompass freight, not solely passenger transport.

Climate resilience policies (CC3) should recognise that logistics infrastructure resilience is essential for supply chain security. Disruption to key logistics sites can have cascading national economic impacts.

Chapter 6: Delivering a Sufficient Supply of Homes

We do not provide detailed comments on housing policies except where these intersect with logistics considerations:

Build-out and large-scale development (HO13): The focus on build-out is welcome. However, major residential developments must adequately plan for logistics infrastructure including last-mile delivery facilities and construction logistics. Planning frameworks for strategic sites should explicitly address freight access and servicing requirements.

Chapter 7: Building a Strong, Effective Economy

Question 84: *Providing conditions for long-term economic growth (E1)*

Strongly agree. Explicit references to Industrial Strategy Zones, AI Growth Zones, and the Industrial Strategy are welcome. However, logistics must receive equivalent explicit recognition. E1 should reference:

- The role of logistics as critical enabling infrastructure for all economic sectors.
- The overall UK logistics network.
- Strategic freight corridors and intermodal facilities.
- Economic importance of efficient supply chains.

The requirement for flexibility in allocated sites is particularly important for logistics, where changing supply chain patterns and technology requirements necessitate adaptable planning frameworks.

Question 85: *Meeting the need for business land and premises (E2)*

Strongly agree. This represents a significant improvement. Giving substantial weight to economic benefits of commercial development is essential and should help counter a housing-first bias that would undermine logistics development.

The specific reference to "improvements in freight and logistics" is particularly welcome. However, E2 should more explicitly state that:

- Logistics developments that enable improvements to identified network requirements should be supported.
- Evidence of unmet logistics need can be demonstrated through market signals including low vacancy rates, increasing land values and operator demand.

- Locational requirements for logistics include transport network access, not just settlement proximity.

Question 86: *Freight and logistics (E3)*

Strongly agree. Policy E3 is the most significant improvement in this consultation for the logistics sector. A dedicated national decision-making policy for freight and logistics is essential and long overdue.

However, E3 requires strengthening:

Explicit recognition of importance: E3 should state that logistics infrastructure is critical to supply chain resilience and economic growth, deserving substantial weight in decision-making.

Protection of existing sites: E3 must include requirements that:

- Proposals resulting in loss of logistics sites should be refused unless replacement provision is made or demonstrable absence of need can be proven.
- The agent of change principle applies: new development near logistics sites must mitigate conflicts.
- Sequential test applies to redevelopment of logistics sites for alternative uses.

Infrastructure considerations: E3 should explicitly reference:

- Need for grid connections and energy infrastructure.
- Importance of rail freight connectivity.
- Requirements for lorry parking and driver facilities.
- Surface water management reflecting large impermeable areas.

Question 87: *Rural business development (E4)*

Partly agree. E4's requirement that rural development "use previously developed land and sites that are physically well-related to existing development" is inappropriately restrictive for some logistics facilities, particularly those serving agricultural supply chains, which may require rural locations with good transport connectivity but are distant from settlements.

Chapter 8: Ensuring Vitality of Town Centres

Questions 90-92: *Sequential test (TC3-TC4)*

Partly agree. The sequential test should be retained for traditional retail and leisure uses. However, it should not apply to logistics and distribution facilities serving wider catchments than individual town centres. These facilities must locate according to transport network access and strategic distribution patterns, not settlement hierarchy.

Chapter 10: Securing Clean Energy and Water

Questions 96-99: *Energy and water infrastructure (W1-W4)*

Strongly agree. Policies W1-W4 represent crucial improvements. The logistics sector's decarbonisation requires enormous energy infrastructure investment, with the Department for Transport's Freight Energy Forum determining that the energy demand for road logistics alone is an estimated 32 terawatt hours of additional energy demand annually by 2050.

Policy W1 should explicitly reference logistics as a major energy infrastructure user requiring early consideration in development plans. Spatial Development Strategies must assess energy and grid requirements for logistics developments and planned transport decarbonisation.

Policy W2 and W3 should recognise that:

- Large-scale renewable energy generation associated with logistics sites (e.g., solar farms powering distribution centres) supports net zero objectives.

- Battery storage facilities co-located with logistics operations can provide grid services.
- EV charging and hydrogen refuelling infrastructure for freight vehicles constitutes nationally significant infrastructure.

Policy W4 should note that logistics developments may require substantial water infrastructure for welfare facilities (particularly where employing large numbers) and for some specialist operations. Early engagement with water companies is essential.

Chapter 15: Promoting Sustainable Transport

We welcome the vision-led approach and movement away from "predict and provide" for highways. However, this must not result in undersupply of transport infrastructure for freight. Freight transport infrastructure serves economic need rather than induced demand and inadequate capacity directly constrains supply chain efficiency and economic growth.

Planning policies must distinguish between passenger car dependency (which “predict and provide” can exacerbate) and freight vehicle access requirements (which are derived from economic activity and cannot be managed through demand suppression).

Chapter 16: Promoting Healthy Communities

Lorry parking must be recognised as essential community infrastructure supporting driver welfare and road safety. The chronic shortage of parking creates serious safety and welfare concerns.

Planning policies should:

- Require major residential and employment developments to consider impacts on local lorry parking demand.
- Support lorry parking proposals where appropriately located.
- Enable dual use of sites (e.g., coach parking, event parking) to improve viability.
- Require unused public sector land with suitable transport connectivity to be considered for lorry parking.

Gaps in the revised NPPF

Inadequate protection for logistics sites

The draft Framework contains limited protection for strategic logistics sites. Sites suitable for logistics face pressure for conversion to higher-value uses (particularly housing), yet their loss undermines the national logistics network and results in less efficient supply chains.

Recommendation: Insert new national decision-making policy requiring:

- Refusal of proposals involving loss of logistics sites unless robust evidence demonstrates absence of need or replacement provision is secured.
- Application of agent of change principle.
- Sequential approach to redevelopment of logistics land.

Insufficient integration of decarbonisation requirements

While energy policies are improved, the Framework does not adequately recognise the scale of infrastructure investment required for logistics decarbonisation. The sector faces transition to zero-emission vehicles, requiring wholesale transformation of refuelling/recharging infrastructure and energy supply.

Recommendation:

- Spatial Development Strategies must be required to assess and plan for logistics decarbonisation infrastructure.
- Policy should establish that EV charging and hydrogen refuelling facilities for freight vehicles constitute infrastructure of strategic importance.

- Grid connection requirements for logistics operations must be addressed as strategic infrastructure.

Lorry parking crisis not adequately addressed

Despite references to lorry parking in the consultation narrative, the actual policy provisions remain weak. Policy E3 mentions "parking provision" but without sufficient prescription to lead to a meaningful change in the level or quality of delivery.

Recommendation: Insert specific requirements that:

- Planning authorities must maintain assessments of lorry parking capacity and need.
- National Infrastructure Projects and route upgrades must assess and provide lorry parking.
- Revised service area standards must require increased lorry parking with improved security.
- Duty exists to consider unused public land for lorry parking where suitably located.

Conclusion

This consultation represents a significant opportunity to rectify many of the issues faced by those seeking to develop logistics infrastructure. The inclusion of Policy E3 demonstrates the government's recognition of the sector's importance. However, without adequate protection for logistics sites, and explicit integration of logistics into Spatial Development Strategies, the Framework will fall short in relation to supporting more efficient national supply chains.

The government's growth mission cannot be achieved without efficient logistics. Planning policy must recognise and support this reality through clear, specific requirements.

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