



CILT(UK) Response to Welsh Government Scoping Document: Port and Maritime Freight and Logistics Plan

1. Introduction

The Chartered Institute of Logistics and Transport UK (CILT(UK)) is the pre-eminent independent professional body for individuals and organisations involved in logistics, transport, and supply chain management across the United Kingdom. CILT (UK) is the largest national council within CILT International, representing over 13,000 members in the UK and more than 33,000 professionals worldwide. Our membership spans all modes of transport and supply chain activities, including significant representation in the ports and maritime sector, with over 300 members based in Wales alone.

CILT(UK) is committed to supporting the Welsh Government's ambition to develop a robust, sustainable, and forward-looking Port and Maritime Freight and Logistics Plan. As the chartered body for the profession, we provide expert guidance, policy input, and professional development, ensuring our members are equipped to address the challenges and opportunities facing the sector. We welcome the opportunity to contribute our collective expertise and insights to help shape the future of maritime freight and logistics in Wales.

We are current core members of the tri-institute group with CIHT and ICE in Wales developing a programme of mainly online webinar events to help inform and upskill members of the three institutions in Wales on all transport related matters.

2. General Comments

CILT(UK) warmly welcomes the Welsh Government in bringing forward its proposal to develop and publish a freight and logistics plan and a port and maritime plan (joint). It has been a very long time since the last plan was published in May 2008 and a new plan is urgently needed by the sector – much has changed including the need for a decarbonisation roadmap, digitalisation, resilience of transport networks, artificial intelligence, and other legislation such as the Well Being of Future Generations Act to name but a few areas.

3. Specific Questions

- **Feed into this scoping document by inserting any projects you are currently working on which have a clear link or benefit to the existing scope and therefore needing to be taken into consideration**

Our members are involved in all the sectors covered by this scoping consultation document. It hasn't been possible to circulate this note in time to draw this out. However, we are aware of work being undertaken by the following forums which will have specific content that is relevant to the development of this plan.

- Freight and Logistics Policy Group
 - Rail Freight Forum
 - Ports and Maritime
 - Aviation Policy Group
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- **Can confirm whether you would like to be involved and kept in the loop about this strategy as you feel the current scope and publication of the strategy would assist with your own areas of work**

Yes, CILT would warmly welcome to be involved with this work – may be through an expert stakeholder panel as part of the consultant's engagement programme.

- **Can help us improve the scope. If there is a piece of work missing from the scope that could really benefit your organisation/business and is very much needed within the sector. We could discuss and consider adding this element into the scope**

CILT would like to add the following to the proposed scope document. This feedback is laid out using the same sections as set out in the scoping document.

4. Specific Feedback by Section

Context

CILT would recommend that the plan references the area of competence for Local Authorities in their role as Local Planning Authorities and Local Highway Authorities as well as the area of competence for the four corporate joint committees and the delivery of their regional transport plans which include a freight element. We would also recommend that the plan refers to non-devolved areas such as railway track infrastructure and safety and security of freight on the different networks for railways with British Transport Police and other modes with the Police.

This is important as supply chains for goods are even more cross border / boundary than is the case for people movements. This is especially the case with movements to / from England, the Republic of Ireland, other devolved nations of the United Kingdom and beyond through Ports and Airports.

CILT recognises that the plan should recognise that ports and logistics are commercial businesses that said there are significant opportunities to improve supply chains and the competitiveness of these companies and the wider economy by devoting greater attention to the critical infrastructure that supports the wider Welsh economy, society and environment. That said the Public Sector (not least the NHS) is both a significant user and generator of freight movements in Wales and this angle should also be adequately represented in this document.

On context – relationships to England, Scotland, Republic of Ireland should be referenced both at a national, regional and local levels. This is especially important as in transport there is a mix of devolved and non-devolved areas. Just like for passengers – boundaries should be as invisible as possible to the movement of freight.

Central to the context is the development of a freight mindset by the public sector to enable the critical success factors for the private sector to thrive in providing the essential movement of goods in, to and from Wales.

CILT would also note the absence of references to kerbside deliveries which by frequency account for 90% of deliveries.

On a broader policy front – not just in Transport but across Government and local authorities to recognise the role and value of freight and for it to be included as standard and not by exception in relevant decisions. For example, consideration by land use and transport planners of the availability and location of national, regional and local logistics premises and kerbside capacity during policy development, the design of new traffic schemes, and in permitting new developments with relevant planning conditions

Path to Net Zero

Unlike in the passenger universe, freight is mainly a private sector endeavour – as such the mindset for decarbonisation needs to reflect the realities of commercial operation and transition in an industry that is particularly capital intensive and in aviation, maritime and railway have assets which have multi-decade replacement cycles. The plan should cover all modes of transport. With respect to rail this should be integrated into the current industry processes – and integrated with the private sector in Wales to provide sufficient. Of particular concern is the road transport sector where to date much if not all the public discussion about charge points has been about cars – with little on the requirements for commercial vehicles.

Of most concern the proposed scope does little if any to address the major structural link with Land Use and the planning system both nationally, regionally and locally. The recent joint consultation undertaken by the Department of Transport and the Department of Communities Housing and Local Government is useful in this regard.

(The official title of the consultation was: ***“Freight, logistics and the planning system: call for evidence”*** published jointly by the Department for Transport (DfT) and the Department for Levelling Up, Housing and Communities (DLUHC)) which was published in July 2023 around seeking to identify understanding barriers, identifying opportunities and gathering evidence. Also tapping into the current refresh of the DfT Future of Freight – which was published in June 2022 would be relevant in this context including the National Freight Network (NFN) and freight modelling capability.

Definition and Data

On data we would suggest that the use of a specialised goods vehicle count be undertaken at key points across the Welsh Strategic Road Network to assess the value and type of goods which are passing key nodes on the network. Transport Scotland have used such an approach at several locations across the network including the A9 / A77 and A75 to name but three locations. Although relatively labour intensive such a survey will give a much more granular insight into the usage of the strategic road network by commercial vehicles.

Generally, freight data is commercial in confidence – that said – relevant questions between Government and commercial organisations involved in this activity could drive awareness of the process and structure an improved framework for the formal inclusion of this activity in the rural and urban streetscape.

Partnership

Under this heading nothing short of a fundamental reset of the relationship with freight and logistics is required particularly as to importance and value in the public sector and the role that the private sector plays in Wales. As part of this beyond the proposed freight council, a comprehensive programme of freight awareness in the public sector particularly elected members and officers in transport, planning and economic development is required including practical interventions such as site visits, briefings and webinars / expert panel inputs particularly to reach service users who may not be members of the two main trade bodies. The good news is that these types of interventions are not cutting edge are being used elsewhere and be applied quickly and without significant resource implications using the convening and co-ordination powers of the Welsh Government with its partners. This programme would be cross cutting across Government departments and local authorities and professional institutes including those in the planning sector.

We note the desire to support rail freight growth in Wales and would urge that Welsh Government to enhance the existing activity of Network Rail / GBR and others in this

regard by using its convening powers with demand generators of freight in Wales – including those who are new to rail freight particularly when major decision points in fleet renewal / location decisions etc come up when firms are more receptive to this questions. Again, this is relatively resource lite and a question of ensuring that dots are connected between industry, infrastructure providers and service providers at the appropriate time in respect of market development.

We note CJC's will be key in ensuring the plan is working with the RTP and would strongly urge that they are included in this skills / awareness / competency development as a matter critical urgency – this also applies to Welsh Government and the Corporate Joint Committees and other parts of the Public Sector in Wales.

National Resilience and Incident Response

This is an important area not least with climate change and extreme weather events impacting on the Welsh rail / road / marine networks. This should build on the existing legislative requirements and feed into the national resilience networks that were built up over the response to COVID 19. The role of strategic networks should extend to local authority roads to include bus / train / warehouse / manufacturing / supermarket and other critical infrastructure.

Innovation

Welsh Government should connect into the existing networks in this area including the work of Transport Innovate Groups and consider expanding the use of TfW Labs in this area outside of its current passenger focussed remit.

Future Considerations

Other topics in this area would include Artificial Intelligence, Land Use Planning and the relationship to goods movement and skills and awareness across Government, Local Authorities and the wider public sector.

5. Recommendations

To be developed during the study.

6. Offer of Support

CILT has a wide range of forums from which expertise can be shared with Welsh Government across all the areas referenced in this scoping document – including but not least – the Freight and Logistics Policy Group, Rail Freight Forum, Ports and

Maritime, Aviation and Bus and Coach Policy Group (for movement of goods) as well as the local CILT Cymru National Committee.

A practical example of this would be the provision of evidence into the required business cases – such as the case for tactical electrification of the south Wales main line on the steeply graded sections to support the use of dual / tri mode electric locomotives in hauling steel scrap / loaded coils to run heavier / faster and longer on this line as an interim to full electrification in future.

CILT can facilitate visits to a range of logistics sites, from ports to high streets, which may be helpful during option development, allowing Welsh Government officials to ask questions in an informal setting.

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