



**The Chartered
Institute of Logistics
and Transport**

Draft Future of Freight Plan

Comments from The Chartered Institute of Logistics and Transport

March 7th 2022

Overview

We welcome the ongoing close relationship with the DfT team leading the Future of Freight strategy, an initiative we strongly endorse and value the engagement which stems from it, which we hope will continue. As the strategy has evolved, we have highlighted the need to focus not just on freight but on supply chains.

Often several definitions are used interchangeably when discussing the movement of goods, and it is important to consider how we use these correctly to deliver the greatest benefit if we are to focus on optimising infrastructure, transition to Net Zero, attract people and develop skills, manage disruption through increase supply chain resilience and assist in the levelling up agenda. For clarity:

- Transport relates to the carrying of goods or people from one place to another, by road, rail, air or sea.
- Freight refers to the goods that are carried whether these are finished products, raw materials or work in progress.
- Logistics means the positioning of resources at the right time, in the right quantity, at the right costs and in the right quality.

These are products or derived demands which are in response to the needs of supply chains. Supply chains encompass the management of upstream and downstream relationships (from source to consumption) between suppliers, distributors and customers to achieve greater customer value added at less cost. It is supply chains that are fundamental to our future as these are the drivers that determine the routes and distances travelled (recognising that not all products and raw materials are available everywhere), the packaging utilised, the frequency of movement, modes of transport utilised and , the number of nodes and their activities (e.g. warehousing, processing, manufacturing etc.) and it is the combined effect of changes in technologies, processes and networks that will enable these to address the objectives of the future strategy.

What follows, given timescales, is a practical response to the draft Future of Freight Plan, written as a critical friend. We hope our comments are clear, however if you have any questions or would like to discuss the matters raised further, we would be happy to meet.

Overarching comments by section:

Section 3 on the importance of freight comes before the sections on the 'approach and purpose' and 'document structure'. It would be helpful if this section provided the policy context (which it does), the factual context through some facts and figures (which it does in part) and raise the range of challenges facing sustainable freight in the UK (i.e. why is the document being produced). However,

it only mentions decarbonisation briefly, with nothing on the range of other challenges the industry faces (e.g. rapid changes in technology, low profitability/lack of money to invest, customer behaviour through home delivery expansion, the complexity of increasing and disconnected regulations) or any understanding of the economics (wage inflation, skills shortage, and customer behaviour).

Raising the Status of Freight Within Central Government: a clear cross-modal approach from the DfT is very welcome, but this must include other departments, especially DLUHC. However, there is an over-emphasis on the Freight Council effectively 'policing' the government which the Council has no powers to do and would be inappropriate. There is no mention of executive agencies, such as the Driver and Vehicle Standards Agency, or the role of the Traffic Commissioners or operator licensing critical to HGV operations or the range of licenses (e.g. restricted licencing) which reduce the potential for logistics efficiency. There is also no recognition of the range of other regulations that impose restrictions on freight activity, such as land use planning controls or highway authority controls critical to last-mile delivery.

Infrastructure: the link between transport activity and land use planning could be made more clearly. As a result the desire expressed in 'where do we need to be' is unlikely to be satisfied. There is no mention of increasing the stock of logistics land or of safeguarding key assets or the shift of traditionally high street land use (retail and restaurants) moving to industrial and logistics land use (warehousing and dark kitchens). Critically, there is no recognition of the need for logistics land and premises in towns and cities to enable local decarbonised deliveries, or of any freight routes into and around major urban centres to link into the strategic national routes.

Transition to Net Zero: The approach mirrors the TDP and relies heavily on technology, which can have unintended consequences. The 'how do we get there' section doesn't fully recognise the link between transport activity and land use planning or suggest action to rectify this.

People and skills: there is brief mention of Civil Service Learning (9.1.52) but a key gap exists in the knowledge of freight and logistics in regional and local government who are responsible for the majority of highway and land use planning decisions. This is not addressed in a meaningful way, and the level of resourcing in these authorities does not exist to enable this to be improved without national government intervention.

Resilience: A clear ownership of resilience planning is required from government to address the significant potential disruption highlighted from climate change and geo-political tensions, on top of the evolution of customer behaviour.

Levelling up: it is difficult to see any 'strong foundations', as the plan does not address current highway regulations or application of planning policy.

Data and technology: mixing tech with data fails to address either area very well.

- **Tech:** The list of government funding/projects is interesting but the lack of results demonstrates the limits of technology. UK PLC is currently throwing money at this with little to show for it.
- **Data:** little direction is demonstrated as to how the government will obtain data from private companies and freight movements to populate the 'data exchange'.

Detailed comments:

Para 3.14 the different modes have inconsistent economic indicators (enterprises v jobs)

Para 3.18 mentions the largest and most important hubs [are] 'industrial heartlands and coastal towns'. This wording should be made more specific, many coastal towns are ex-tourist hubs, and it is specifically the smaller ports that have suffered (e.g. Kings Lynn/Newhaven).

In section 4 'Raising the Status of Freight Within Central Government' there is no mention of executive agencies, such as the Driver and Vehicle Standards Agency or the role of the Traffic Commissioners or operator licensing.

Para 4.4 final bullet is overly positive - authorisation of new rail freight schemes has virtually ground to a halt since the Hendy Review in 2015 and funding of a Strategic Freight Network was not perpetuated in Control Period 6 (2019-2024). The only significant enhancements that have taken place in the last few years were authorised prior to the Review and it is clear that things are going to get even harder in the next few years, due to Treasury policy. DfT is more supportive than they have been for many years, but treasury remains resistant.

Para 4.7 - BEIS is one notable omission from the list of Departments. Logistics serves business, is key to industrial strategy and a decarbonised energy supply will be critical to future logistics, so should be included. Similarly, the Home Office and the role of Border Force and customs and excise paperwork for imports and exports should be added.

Para 4.10 FC Remit - fine, but unless HMT are prepared the necessary funds, especially for infrastructure, the FC will be little more than a talking shop, independent co-Chair or not. Without full inter-departmental participation "overcoming the siloed approach", "supply chain focussed work streams" are a fiction. The BPDG model for cross-departmental engagement as recommended at the CILT 2017 Round Tables (at DfT's request) have proved very successful with their stakeholder steering groups.

Para 4.11 FC membership - starts to look unwieldy. Given the critical importance of infrastructure, Great British Railways and National Highways should be members, not relegated to the Delivery Groups.

Para 4.14/4.15 - CILT should be included, as the professional institute for freight and logistics, and DfT should not rely solely on Logistics UK for input.

Para 4.17 Measuring Success - raising awareness amongst the public and across Whitehall is insufficient. KPIs should include supply chain efficiency, infrastructure delays (road and rail) and carbon emitted - i.e. the things that matter to UK plc and sustainability. In fairness, this is mentioned in square brackets at the end.

para. 5.1.4 Portsmouth port is owned and operated by Portsmouth City council.

Para 5.1.4 - again, overly positive at least as far as rail is concerned. UK Government has not invested in rail freight terminals for over a decade, since the Freight Facilities Grant was suspended in England and unfunded in Wales, with only Scotland retaining - and using to good effect. It's reinstatement elsewhere would be a key step in encouraging the private sector to invest and provide excellent value for taxpayers as FFG usually represents a minor proportion of the total investment.

Para 5.1.6 - Southampton to Golden Triangle is important and the NH/NR study was valuable, but Felixstowe to Golden Triangle is much more important and a parallel study of the A14 corridor is

urgently needed. Air freight is not addressed suitably. The graphic defining passenger v freight aircraft movements by airport not understanding the key LHR role of approaching 1.5 million tonnes p a through belly-hold freight. True, later on it is addressed in Section 10, but then fails to understand the role of cross Channel trucked air cargo transshipment. The influence of EU in our transport planning in all modes need greater prominence: irrespective of the political drivers as we have always stressed, supply chains have both ends with multi-modal middles which can neither ignore EU ongoing relevant legislation and codes of practice nor with RoW.

Para 5.1.1 (note numbering error - this s/be 5.1.9 - and the error continues in subsequent paras) - misses the key point that much the biggest component of domestic freight handled at ports is North Sea oil being shipped to UK refineries for processing. In tonnage terms, the next largest component is coastwise movements of refined petroleum products to distribution facilities at ports, including some small ports like Inverness and Plymouth. There are also significant tonnages of aggregates moved by coastal shipping, e.g. from Scottish quarries to the South East, and of sea-dredged material. Only then do we get to RoRo ferries to Northern Ireland, plus offshore islands. Feeder movements around the coast are tiny - a few vessels a week - as most feeders operate from Northern European ports, notably Rotterdam.

Para 5.1.7 - more is indeed needed on 'non-container rail cargo'. Consumer goods - a good proxy for intermodal - make up 40% of rail tonne-kms, construction materials (mostly aggregates) 30%, with other bulk materials (steel, petroleum, minerals, biomass, waste) accounting for the remaining 30%.

Para 5.1.8 - the CP5 SFN Fund was very productive, but was not perpetuated in CP6 and CP7 is as yet unknown. Without a SFN Fund, authorisation of new freight infrastructure investment has virtually ground to a halt. The RNEP process has been very poor for freight and is used by Treasury as a regulator of spending, not the means of determining the best value projects as it was portrayed.

Para 5.1.9 - Williams-Shapps certainly highlighted the importance of rail freight, but it is incorrect to say it has been a beneficiary, as nothing tangible has yet emerged and the specific recommendations - like electrification - are stalled due to Treasury support for development expenditure, let alone 'spades in the ground'.

Re targets, the level of modal shift we've assessed as feasible (38% of HGV tonne-kms, 15% of HGV tonnes) can be achieved with a 5% CAGR between now and 2050. As the current organic growth rate is c.3% p.a., this does not seem unduly challenging and we've proposed a stretch target of 7.5% for the first 10 years. This would make some early inroads into HGV carbon emissions in the face of the IPCC 'Code Red' warning and is, coincidentally, the target that Transport Scotland set some years ago for rail freight north of the Border.

Para 5.1.11/12 - IRP does deliver freight provision on Trans Pennine but doesn't do much for freight elsewhere. Retaining Inter City trains to Yorkshire and the North East on ECML, instead of diverting them to HS2, means that this electrified trunk route we'd expected to be available for freight will now be full with passenger trains. MML electrification excludes the route taken by most freight trains, via Corby and Totton rather than Leicester and Derby.

Paras 5.1.10-16 on Cross Modal Freight are welcome but need funding and coherent action to deliver - which is currently lacking.

Road Freight 5.1.13 to 5.1.22: The RIS have been important, but the current situation is not specified correctly. Road freight provides the most flexibility of movements from origin to destination and there are a variety of ways of moving it – HGV, van, bike, etc. The issues for road freight are the

increasing distance between these O&Ds, the capacity and characteristics of the network between the O&Ds, and the journey time reliability.

5.1.23 Strategic Freight Network: In order to achieve net zero and in response to future developments in consumer behaviour between now and 2050 it is highly likely that supply chain networks will change over time. As an example, the dependence of NDCs based in close proximity to the demand centre of gravity for the UK (the Golden Triangle) and proximity to road and air parcel hubs may well change as companies consider the potential to include more localised distribution centres (and potentially the use of micro hubs).

Determining the current SRN is relatively straightforward but the key and missing element in the plan is what is then done with that information and to what purpose. The inclusion of facilities for drivers both en-route and at pick up-drop off points is key for future planning as is the inclusions of SRFIs allowing modal switch and increased movement of freight by rail from/to ports and major stocking locations.

Paras 5.1.17-36 set out the objectives very well but a coherent, funded delivery plan is a *sine qua non*. Without it, implementation will be challenging.

Air Freight 5.1 to 5.9: The pre-pandemic information seems to be appropriate and there is mention of the impacts of the pandemic, but no description of these impacts nor a range of possible scenarios that may need to be planned for.

Para 6.6 HVO - hydro-treated vegetable oil is an excellent LCF and is favoured for use in rail freight diesel locos in advance of electrification. It is currently too expensive and it needs Government incentives to encourage its use.

Para 6.1.2 - the funding allocated to mode shift grants is small and yet they are much the most effective means of incentivising modal switch and decarbonisation to tackle the Climate Emergency. If Government is serious about decarbonising freight and logistics, a doubling or trebling of the grant budget would produce a rapid and effective response from businesses. The current budget is substantially over-subscribed and there are many companies who would like to switch modes to save carbon, but are unable to do so because the grant budget is grossly inadequate.

Para. 6.1.6 the complexity of freight flows between origins and destinations means that 'underground solutions' will not be developed without high levels of public funding as significant freight volumes of a consistent size/shape/weight do not currently exist.

Drones have not been 'proven' for logistics. Drone flights have been made to the Isle of Wight, but the successful demonstration was of an ICE drone between airfields which required human intervention at both ends. Research is continuing using an electric drone to transport chemotherapy from point to point, to reduce the need for human interaction. However, the current costs of the drone, energy use, and safety systems suggest the cost/benefit of drones will remain fairly niche for some time to come.

Paras 6.1.7-9 - eVans and cargo bikes certainly have a role, but this needs to be kept in context. The biggest freight volume movements into an urban area are food and drink (mostly via supermarket supply chains), construction materials and fuel, although the latter will presumably diminish as we decarbonise. Small vehicles are not relevant to these volume supply chains and other technologies - such as smaller (6-8m) intermodal units, moved by electric rail from a DC to the urban area for final delivery by battery truck - are one possible solution. The same applies to movements of waste out of cities - it's a bulk freight operation, for which vans and bikes are irrelevant.

Para. 6.1.8 The DfT should undertake independent research into the use of dynamic kerbside systems as these claims are unproven. The majority of kerbside in towns and cities and all kerbside in rural areas is currently free to use to any delivery vehicle and the impact of pricing a free asset needs to be understood. It is also unclear how this would 'reduce high-carbon delivery traffic' as 6.1.9 is urging the use of cargo bikes and electric vans, and even 37t battery electric HGVs are now being trialled. The future challenge in urban areas is likely to come from congestion, air quality (PMs from tyres and brakes) and road safety, and anything that reduces the likelihood of 'right vehicle/right time' must be counterproductive.

Para. 6.1.7 and 6.1.9 Currently the cargobike sector is not regulated and not all of the vehicles are roadworthy. Many businesses are seeking to profit without the necessary management of their riders for road safety or having any insurance.

6.1.10 needs to recognise that air quality will move from NOx/CO2 to PMs from tyres and brakes.

Para 6.1.21-25 - 37t pure battery artics with a range of c.100 miles entered service in Dec 2021. This capability is transformational, as 61% of HGV tonnes lifted move less than 100km, meaning that such journeys can be completed out-and-back on one charge. Further improvement in battery technology and charging systems means suggests that 150km on one charge is not too far off and this would cater for 74% of HGV tonnes. Adding the 15% of HGV tonnes that are well suited to modal switch to rail takes us to 90% of all HGV tonnes that can be moved with existing - or soon to be feasible - technology. This suggests that untried novel options like hydrogen and the e-Highway are unlikely to be justified.

Para 6.1.27 is misleading. Around 2/3rds of the 2000-mile core freight network is already electrified and wiring another 750-800 route miles would allow c.95% of rail freight to be electrically hauled. This proportion is likely to rise further, as modal switch will occur mostly on the main routes which are already electrified or would be wired under the proposed freight electrification programme. Critical to note that this involves wiring less than 15% of the full TDNS electrification strategy and would also benefit passenger services operating on the same routes.

Para 6.1.33 - 6.1.3 (numbering issue) - dodges the key point from industry that Government needs to display leadership, clarity and consistency in its decarbonisation strategy, with early funding of 'no regrets' investments like rail freight electrification, for which it is extremely unlikely that a credible alternative will emerge.

Para 6.1.29 - as noted above, the current MSRS budget is inadequate, so maintaining it at this level is hopeless if key policy objectives are to be achieved.

Paras 6.1.30- 34 - fine, but unless followed by Treasury-approved funding for implementation will achieve nothing.

6.1.34 Measuring Success: Assessing emissions of CO2/tonne kilometre are valid measures for assessing reductions in the UK but two factors need to be considered:

- Is the assessment based on tail pipe emissions or on a "well to wheels basis"? The latter is more valid from a holistic perspective particularly given for example concerns over the potential generation of hydrogen as a fuel source
- Should overall supply chain impact not be taken into consideration rather than assessment purely within the borders of the UK? Achieving net zero will require changes in supply chain

networks and consideration of how product is sourced, manufactured and moved into the UK is also a key element to be taken into consideration.

Para. 9.1.3 It is incorrect to say that HGV drivers make up 79% of logistics workforce. This statistic is not referenced but it is likely that this number is out-weighted by the number of van drivers, bike riders, warehouse operatives for picking and packing, 'back-door' reception staff at delivery points, in addition to the workers in rail, aviation and ports. This statistic is repeated in para 9.1.8

para. 9.1.16 progress is being made in HGV drivers, but very little activity is occurring in the rest of the industry.

Paras 9.1.10-23 – a challenge for attracting the next generation to HGV driving is tramping. The younger generation, not unreasonably, want to get home each night to see family and friends. Living, eating and sleeping in a cab for days on end is no longer socially acceptable and a new model of trunking has to be found. Part of the solution is likely to be modal switch of trunking to rail, with HGV day drivers delivering intermodal units on the final leg. The tactical point addressed are appropriate but won't change the fundamentals.

Para. 10.1.3 to 10.1.5: the phrase "the freight and logistics sector is a resilient one" is misleading. Logistics operators deliver day-in, day-out through sun, wind or snow, as that is what they are paid to do. The sector also needs to keep going to keep the nation fed but that does not make it resilient. Supply chain owners (often the retailers and manufacturers) reliance on JIT has been to reduce the costs to their businesses of holding inventory. In recent years there was an awareness of the potential for customer service issues of this approach, leading to near-shoring of more manufacturing, but the pandemic caught everyone out. Brexit is also turning 10.1.5e on its head – importing more often is now becoming much more expensive and unreliable, and the full impacts, especially in Northern Ireland have not yet been felt.

10.1.17 - consumer behaviours will continue to evolve. Rural challenges should be highlighted. P72 is good on the role and content of NPPF recognising the importance of providing adequate overnight lorry parking facilities taking into account any local shortages. But National Highways play a role in incorporating realistic HGV traffic loads from new high density B8 developments into highway resilience planning, central to Planning Circular 02/2013 update 2022, p74.

Para 10.1.8 - 2 extra paths on the Felixstowe and 100 HGVs a day off the road is hardly the issue. The key strategic need is to double parts of the largely single track Felixstowe branch and/or take off the very lightly used passenger service for most of the day. Similarly double the 4.5 miles of single track between Soham and Ely - the equivalent of having one lane for all the traffic on the A14, in both directions. This would give 20+ extra paths and 1000+ HGVs a day off the road - it would also create more capacity in London by allowing some trains which are currently routed via the Capital to be diverted via the cross-country route. The capacity thus created will be needed for additional intermodal trains from London Gateway and Tilbury2, as well extra bulk services for aggregates etc.

levelling up: (no para. Numbers)

We would suggest that we don't have strong foundations to build on. The plan recognises freight operates across Local Authority boundaries but there's nothing on local EV charging facilities, and more critically, the plan does not seem to understand or address the current highway regulations or application of planning policy.

Some of this is attributable to the knowledge gap of freight and logistics in regional and local government, which means that, despite NPPF, very few LAs recognise the current impact of freight

on employment or transport and none of them recognise the seismic shift occurring in consumer behaviour and the inadequacies of the current land use planning classifications.

Over 80% of delivery activity probably occurs on the kerbside and the current application of highway regulations and controls is patchy at best. Pockets of good practice exist, but there is little understanding of freight parking and loading activity, with Royal Mail vans parking overnight on double yellow lines (which they are not allowed to do) and marked loading bays being too narrow to accommodate an HGV or not enforced sufficiently.

How do we get there:

- There needs to be recognition that a consolidation centre is a warehouse by another name
- The 'Manual for Streets and National Model Design Code' could easily be delivered as the TfL streetscape guidance incorporates a lot of good practice
- Again, there is the reliance on the Freight Council to 'police' progress

Chapter 6 - needs to put location of major DCs (NDC and RDC) front and centre. If we are to decarbonise freight and logistics, DCs over (say) 500k sqft will need to be on rail-connected sites and proposals for major new distribution parks at non rail-connectable locations need to be ruled out by planning policy guidelines. What we build now and over the next 5 years will take us well beyond 2050, so has to be consistent with Net Zero 2050, yet major new DC complexes without rail connection are being proposed and permitted. Clear cross-departmental leadership is required as a matter of urgency.

12.1.3 need to recognise the current limits of technology. Current applications of autonomous vehicles are on private land and autonomous vehicles are likely to be un-useable in urban settings due to the lack of journey time reliability.

See comments for underground systems and drones under 6.1.6

No recognition of improvements in packaging, or noise abatement or 3-d printing?

12.1.7 end users have a lot more information now, but there is no attempt in this plan to address behaviour change that could also help to "improve efficiency, reduce congestion and emissions of operators [For example]."

12.1.8 A knowledge exchange portal would ideally cover both industry and local authorities, to maximise change in the shortest possible time.

12.1.10 On data, the critical question is how will the government obtain data from private commercial companies if the freight is not crossing the border?

Chapter 8 - good, but needs explicit Treasury endorsement and acceptance of the funding required, starting forthwith no-regrets 'low hanging fruit' investments.

Recommended Case Study:

Response to Section 6 of DfT Future of Freight Plan as example of best practice.

CILT is supportive of the statements set out in Section 6 of the Future of Freight Plan. The following text has been extracted from P72- 75 as a lead-in to an example of best practice: a planned B8 road/rail interchange development at Hinkley by Tritax Big Box currently running through the planning process.

Tritax presented this development at CILT's HGV parking and driver welfare round table organised on behalf of DfT on 27.01.22 as an example of a current planning application for an up to date intermodal interchange incorporating road and rail accessible storage and consolidation accommodation designed to maximise the potential of sustainable storage and handling technologies and incorporating HGV parking and driver overlay facilities as original features in the design. It is an example of the industrial development industry working within the spirit of the NPPF. It is to be recommended.

The links to this development are included at the end of the following excerpts.

"Local planning policies and decisions are expected to help create the conditions in which businesses can invest, expand and adapt. The NPPF makes clear that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of industries, and for storage and distribution operations at a variety of scales and in suitably accessible locations. Planning policies should also provide for large scale transport facilities, located in areas of need, which include interchanges for rail freight. The NPPF also makes clear we already expect planning policies and decisions to recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages.

As previously described, the freight sector relies on different modes of transport to move goods and this means the planning system needs to make land available for the receipt, storage, processing, interchange and distribution of goods. We need a supply chain network that is secure, predictable, reliable and resilient with no link in that chain overlooked, including the need to provide the right high-quality facilities and infrastructure required to support freight and logistics workers. Local planning and highways authorities have a crucial role to play in planning for delivery of the right infrastructure, where it is needed and at the right time, to support the sector.

The suite of transport National Policy Statements set out the need and strategic planning policy for National Significant Infrastructure Projects (NSIPs), recognise the importance of our ports, roads and rail network in the movement of freight including, where applicable, in delivering modal shift through provision of strategic rail freight interchanges. We are reviewing the National Networks National Policy Statement (NNNPS) to ensure that it remains fit for purpose in supporting the Government's commitments for appropriate development of infrastructure for road, rail, and strategic rail freight interchanges.

The planning system needs to ensure that sufficient land is being made available for freight uses and that it responds to the changing needs of the freight and logistics sector such as how to plan for future vehicle technologies. This has come into sharp focus in the last couple of years as we responded to the pandemic, to driver shortages and to our departure from the European Union.

There are several reasons for this. In some cases, local planning authorities are not actively planning for freight and Industry is not engaging early enough in the planning process. Without this, the

critical need to identify, safeguard and prioritise the land needed for these uses will not be clearly understood. In addition, sites that support freight activities like ports, lorry parks, refuelling stations and infrastructure, as well as distribution centres often require large amounts of land and need to be strategically located near transport links. They operate across local authority boundaries and use the local and national transport networks to move goods which impacts other road users and local communities.

At the heart of the Government's ambitions for an improved planning system is more usage of sustainable transport modes and a decarbonised transport network.

Setting a clear and unambiguous case for the end-to-end needs of freight and logistics that can be taken account of in all stages of plan-making and decision taking: we will take forward work to review and where appropriate amend planning practise guidance to better support freight and logistics.

The existing NNNPS reflects the important role our strategic road and rail network has in supporting the needs of freight. Through the current review of the NNNPS we will consider the growing importance of major freight schemes to our economy, particularly the increasingly important role of strategic rail freight interchanges (SRFIs) and the interdependencies between different transport hubs along the supply chain.

Planning Circular 02/2013: We will consult on and publish an updated Planning Circular later in 2022 including higher standards for roadside facilities on the strategic road network so that we can provide better facilities for HGV drivers. This will build upon the Written Ministerial Statement published with the Department for Levelling Up, Housing and Communities, which made clear that in preparing local plans and deciding planning applications, the specific locational requirements of different industrial sectors should be recognised and addressed by local planning authorities.

National Policy Statements: The existing NNNPS reflects the important role our strategic road and rail network has in supporting the needs of freight. Through the current review of the NNNPS we will consider the growing importance of major freight schemes to our economy, particularly the increasingly important role of strategic rail freight interchanges (SRFIs) and the interdependencies between different transport hubs along the supply chain."

<https://consult.hinckleynrfi.co.uk/#home>

<https://tritaxsymmetry.com/wp-content/uploads/2019/08/Hinckley-Masterplan-5905-249-scaled.jpg>

Submitted by:

Daniel Parker-Klein

Director of Policy and Communications

The Chartered Institute of Logistics and Transport

Daniel.parker-klein@ciltuk.org.uk

07894 620655

March 2022