

National Planning Policy Framework (NPPF) Consultation: CILT Submission

Question 12

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

We agree and consider this must include strategic freight and logistics facilities such as rail freight facilities and intermodal terminals. Joint Local Plans should be encouraged, particularly in areas where administrative boundaries are tightly drawn.

Question 13

Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?

Yes, strategic freight and logistics facilities - such as rail freight facilities and intermodal terminals – take a long time to evaluate, design and construct and are costly long life private sector assets with an extended payback period for investors. It is thus essential that the planning system enables such long term and ambitious planning.

Question 20

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

Use of brownfield land is welcome, but it is essential that critical strategic uses such as (current or future) rail terminals and wharves serving aggregates and metal recycling facilities are not viewed as expendable in the drive for more housing. Such activities are essential for urban areas and their residents and have to be located close to the point of consumption. Rail routes and waterways are fixed features of the landscape and such facilities have, by definition, to be located along them. Suitable sites are few and far between and must be preserved for these uses.

Question 21

Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?

We agree and would wish to see strategic freight and logistics facilities, such as rail freight facilities and intermodal terminals, included in strategic freight and logistics facilities such as rail freight facilities and intermodal terminals included in the list of activities in paragraph 155.

Question 23

Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

Yes

Question 25

Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

Yes. Principles should be in NPPF, with further guidance in PPGs

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?

We consider that Transport Land should become an additional category of safeguarded land to ensure that policies on Decarbonisation, Mobility, Modal Shift and Rail Freight Growth are not frustrated. With this proviso, we agree with the proposals.

Question 29

Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?

Yes

Question 30

Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

Yes

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 consider this must include strategic freight and logistics facilities such as rail freight facilities and intermodal terminals.

Question 62

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

Para 87b is especially important in stating the need for storage and distribution operations at a variety of scales and in suitably accessible locations. We would stress the need for different types of facilities in differing locations – large warehouses for National and Regional Distribution Centres (NDCs and RDCs) in key locations around the UK, plus smaller sites in urban areas for distribution of both bulk materials (notably construction materials for house building) and consumer goods. It is imperative that, to achieve, Government's

Decarbonisation, Modal Shift and Rail Freight Growth strategies, all such facilities should be rail (and/or water) connected.

With this proviso, we strongly support the changes proposed to paragraphs 86 b) and 87 of the existing NPPF.

Question 63

Are there other sectors you think need particular support via these changes? What are they and why?

We consider that ports and other waterway facilities should be included.

Question 64

Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?

We would support the inclusion of gigafactories, as these are large scale facilities akin to the uses already included. We are less convinced about data centres and laboratories, since these are more aligned in size and scale to general commercial developments. We very much support the inclusion of power supplies and grid connections in support of transport decarbonisation, notably to haulage depots, distribution centres and bus garages, as well as similar rail facilities and ports.

Question 66

Do you have any other suggestions relating to the proposals in this chapter?

We recommend strongly that certain transport and logistics facilities that currently fall below the scale thresholds should be capable (on request) of being directed into the NSIP consenting regime, notably smaller rail/intermodal terminals required to achieve Government's 75% rail freight growth target. Existing NSIP provisions have generally worked well in facilitating the delivery of large facilities, like Strategic Rail Freight Interchanges (SRFIs), but rail freight growth - and construction of large numbers of new homes together with new towns - is equally dependant on the provision of additional smaller, more compact facilities for receiving and processing aggregates and other materials. Bulk materials have a much greater density than consumer goods handled in warehouses and do not, therefore, require as much space. It is illogical to exclude bulk rail freight facilities from the NSIP regime simply on the grounds of area required for a given operation.

Question 67

Do you agree with the changes proposed to paragraph 100 of the existing NPPF?

Yes, very much including the provision of suitable public transport facilities and deliveries to residential and commercial properties. In addition, sites for construction materials being delivered, either on a permanent basis or temporarily, should be included.

Question 69

Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

Kerbside deliveries are a key part of the supply chain, both to commercial and residential properties. We would wish to see this emphasised and included in paragraph 114c. We consider the National Model Design Code is inadequate and fails to adequately cover freight, deliveries and servicing. With this proviso, we agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF. As a general point, Vision led' planning is fine if the pathway to achieving the vision is identified and funded. We need to avoid plans becoming idealistic and unachievable

Question 72

Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?

Yes

Question 73

Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

Yes

Question 75

Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?

Yes

Question 76

Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?

Yes

Question 78

In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

We would emphasise the need to encourage and facilitate electrification for rail freight and HGV charging infrastructure, with priority given to depots, distribution centres and intermodal terminals. Also included in this are ports and bus garages, which will also need a large power supply for charging vehicles and vessels.

Question 79

What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?

We consider carbon accounting needs to be used far more extensively to drive decarbonisation. Emissions reporting is already a common practice for many logistics business as a response to requirements from their customers and investors. The EU Corporate Sustainability Reporting Directive 2025 will make it mandatory for many EU businesses to report their Scope 3 emissions and the UK will have a similar Sustainability Disclosure Standard, issued by the Department for Business and Trade. In addition, the EU's Carbon Border Adjustment Mechanism (CBAM) requires emissions released in manufacturing and transport to be reported, starting with carbon intensive goods, with a Carbon Tax implemented from 2026. A UK CBAM is intended to be in place by 2027 to ensure imported products are subject to a carbon price comparable to that incurred by UK production. It is evident, therefore, that carbon accounting will be required in any event for many sectors and increasing its use in plan-making and planning decisions should become more straightforward.

Question 81

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

Rail transport generates around 75% less carbon per tonne mile than HGVs, even using diesel locomotives and carbon emissions drop close to zero when electric locomotives can be used. Other emissions, notably of particulates, are also very much lower with rail freight than HGVs. It follows that the planning regime should do everything possible to encourage and facilitate modal shift to rail (and water). Intermodal terminals and other rail freight facilities are a - often the - key component in achieving modal shift and a duty to facilitate and encourage modal shift of freight and logistics should be placed on planning authorities.

Question 82

Do you agree with removal of this text from the footnote?

Yes

Question 87

Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?

Yes – Local Plans must be kept up to date. Monitoring their success/failure should be pursued and penalties imposed if Local Authorities do not do so.