Chartered Institution of Highways and Transportation

Government Consultation

Freight, Logistics and the Planning System: Call for Evidence

October 2023

For any inquiries, please email technical@ciht.org.uk

Executive Summary

The Chartered Institution of Highways & Transportation (CIHT) welcomes the call by the Department for Levelling Up, Housing and Communities (DLUHC) and Department for Transport (DfT) for evidence on Freight, Logistics, and the Planning System. CIHT supports the current Future of Freight plan to move freight from road to rail and decarbonise the freight sector. In our response, CIHT highlights the potential challenges of last-mile deliveries and pressing needs of the sector that should be urgently addressed.

CIHT believes that the needs of freight and logistics should be better incorporated in Local Transport Plans, Local Plans, and in the National Planning Policy Framework. This requires a clear vision of how the national transport network is to be developed over the next few years – including maps (i.e., routes, National/Regional Distribution Centres), facilities, and strategic intermodal locations. There should be stronger government assistance to guide local authorities to forecast freight needs when considering their local transport plans and to clarify how to deal with cross-boundary issues, modal shift, and planning for distribution centres.

Response to the consultation

This response is based on the outcomes of a CIHT-hosted joint webinar[1] with the Chartered Institute of Logistics and Transport (CILT) and a survey[2] among CIHT, Royal Town Planning Institute (RTPI), Transport Planning Society (TPS) and some other professional institutions' members. The survey sought a broader perspective on issues around freight, the planning system, and logistics in England. Please see Appendix 1 for a full list of survey questions.

In this response we focus on the following questions from the consultation document:

1. How can planning policy in England help to support the freight and logistics sector across the whole of the UK?
2. How effective is the planning system at addressing the operational needs of the freight and logistics sector and how could this be improved?
3. How can the planning system support our net zero ambition for freight and logistics?
4. How should freight and logistics be factored into statutory local transport plans and sub-national transport strategies? How could a national freight network be recognised in national planning policy?

The survey identified a need for an evidence-based approach based on a better understanding of how a range of factors may shape freight movements. These include:

- A need, driven by Net Zero to shift cargo from air and road
- The impact of reduced investment in rail freight
- Competition for land availability and use
- Energy costs

Planning Policy in England

How can planning policy in England help to support the freight and logistics sector across the whole of the UK?

Based on the webinar and survey results, there are a number of important national needs or challenges in the freight and logistics sector that should be better reflected in planning policy and guidance. These include:

- Freight decarbonisation
- A modal shift away from roads and connectivity across modes

[1] 115 people registered for the CIHT/CILT webinar on 12 September 2023 and 73 joined on the day.
[2] 48 people participated in the survey.

- Improved resilience and reliability of the network
- More efficient logistics
- Improved sustainability and reliable last-mile deliveries
- Overcomplication and confusion of the current planning system

Respondents believed that it is important to improve Government guidance on planning policy and its role to support freight and logistics at all levels (i.e., national, regional, local) and coordination and communication between and within relevant government bodies.

How effective is the planning system at addressing the operational needs of the freight and logistics sector and how could this be improved?

Overall respondents reported that they find the current planning system for freight overcomplicated and confusing. Action to address this situation should include:

- Improved communication and coordination between different tiers of government bodies and with the freight sector
- Clarity on how cross-boundary matters will be managed
- Development of a methodology for local governments and authorities to forecast freight needs
- Comprehensive guidance on how local plans should address planning for freight, including improving logistics to promote multimodal, sustainable, and efficient deliveries

How can the planning system support our net zero ambition for freight and logistics?

Respondents believe that planning policy can help increase sustainable deliveries and achieve Net Zero by:

- introducing coherent policies to facilitate modal shift
- facilitating more multimodal hubs for different levels
- fostering transit-oriented development to reduce sprawl and allow for freight consolidation and fewer trips
- identifying sites suitable for rail freight distribution, EV charging, and last-mile delivery modes hubs

The planning system is vital in ensuring freight and logistics centres are strategically located to maximise access to them by sustainable transport modes. Survey

respondents believe it is crucial to proactively incorporate these large centres in Local Plans and Local Transport Plans. This would enable better links to the rail network, strategic road network and multimodal hubs. Ideally, any freight and logistics centres should be developed with safe and effective cycling and bus links to the nearest settlements. However, this would require major transport infrastructure development, investment, and enhanced monitoring system by the government.

How should freight and logistics be factored into statutory local transport plans and sub-national transport strategies? How could a national freight network be recognised in national planning policy?

Respondents believed that freight and logistics should be better incorporated in Local Transport Plans, Local Plans, and in the National Planning Policy Framework. This should include a clear vision of how the network is to be developed over the next few years – including maps, available facilities, and strategic intermodal locations. They also stated that there should be stronger government assistance to clarify how to deal with cross-boundary issues, modal shift, and planning for distribution centres when considering local plans and local transport plans, which should be reflected in the national policy guidance.

In the next section there is some additional data CIHT gathered on freight and logistics beyond questions of the consultation. The output includes challenges on freight, logistics, the COVID-19 impact, the decarbonisation of the sector, and last-mile delivery solutions.

Current Challenges of Freight

Webinar attendees identified several challenges that the freight sector currently faces.

Net Zero & Decarbonisation

The highest priority is the issue of carbon emissions and how the freight sector can be decarbonised to contribute to achieving Net Zero.

In this context concern was also raised about the lack of coordination between private freight and logistics companies which can result in empty running. In 2019, empty

HGVs travelled 5.737 million kilometres in the United Kingdom[3], contributing to carbon emissions and traffic congestion.

It is also challenging to find enough financial resources to develop sufficient rail capacity that would drive the decarbonisation of the sector and move a great deal of freight from roads. According to data[4] on freight, 85% of Great Britain's domestic freight was still moved on roads in 2020 despite £235 million[5] invested by the Government in enhancements of rail freight.

When asking the audience whether they believe Net Zero is achievable by 2050, we got very mixed responses:

- **43%** of webinar attendees believe that Net Zero in freight transport **is achievable by 2050,**
- **23%** said that it is definitely **not possible** before 2050 and
- Remaining **34%** were not sure

Participants at the joint workshop identified the following priorities to support freight decarbonisation:

- Encouraging modal shift from road to rail
- Electrification of the core rail freight network (focusing on the most frequently used routes to avoid unnecessary carbon intensive construction work)
- Incentivising improvements in logistics to discourage empty trucks being present on roads
- Incentivising deliveries to local hubs to reduce the demand for deliveries to individual properties
- Restricting heavy goods vehicles (HGVs) movement during peak periods

In the survey, when asked to rank options to decarbonise freight, the least popular option remained decarbonisation of the energy used for transport purposes (only 38% said it is very important), while the leading responses were:

- the importance of the modal shift from road to rail (72% supported it)
- improvement of vehicle occupancy and logistics (61%)
- a zero-emission last-mile delivery (56% chose it as a very important initiative).

[3] Domestic Road Freight Statistics, United Kingdom 2020 (publishing.service.gov.uk)
[4] Domestic freight share moved in Great Britain by mode 2008-2020 | Statista
[5] Future of Freight (publishing.service.gov.uk)

Understanding the impact of COVID 19

COVID-19 had a major impact on the freight sector, which is reflected in key data sets. Any assessment of future freight capacity needs to take into account this disruption and the difficulty of establishing a more stable assessment of current and future capacity.

More broadly, CIHT survey data shows that despite some positive impacts – for example, convenient and fast home delivery and more resources for facilities and improved logistics – COVID-19 had generated many negative consequences, including:

- An unprecedentedly increase in short trip deliveries (e.g., next day deliveries) with the concomitant increased impact on carbon emissions and congestion (not least from the increase in the number of half-empty vans). Respondents suggested that this growth of demand may need to be restricted for example by introducing more local pickup and drop-off local points to replace individual deliveries. Growing demand for delivery vehicles may also increase the risk of an increased number of poorly maintained vans on the road, which in turn may represent a risk to other road users.
- The increase in online shopping has continued to undermine the viability of town centres and significantly decreased high street shopping with potential implications for growth in unemployment.

Last-Mile Delivery Solutions

In the CIHT survey, respondents were asked to rank the last-mile delivery solutions for freight from the most efficient to the least efficient from the following list: cargo e-bikes, drones, light vans, automated robots, and 3D local printing instead of deliveries.

- The **most** efficient last-mile solutions were cargo e-bikes (72% chose it as their first choice) and light vans (28% chose as their first choice, 44% as their second choice)
- The **least** efficient – according to respondents' views – were automated robots (e.g., starship) – 67% chose them as their least efficient choice and drones (66% chose them as their 4^{th} or 5^{th} option)

Finally, the workshop session identified challenges facing different options for improving last mile delivery:

E-cargo bikes

- Inadequate carrying capacity of e-cargo bikes compared to light vans
- Not as good/useful in rural or remote areas
- Securing enough resources to train delivery riders to ensure the safe interaction of e-cargo bikes with other vehicles

Drones

- Weather conditions: drones cannot be operated in windy weather or when it rains, which means the delivery system will be severely disrupted
- Flight regulations and rules applicable to road safety in case a drone falls on the vehicle or a pedestrian. This needs DLUHC engagement and a proper integration of the planning system and Airspace Regulations (Civil Aviation Authority) with clear responsibilities for involved regulatory bodies.
- Privacy issues and permission to fly over private properties

Automated robots (e.g., starship):

- The most important question is their place on roads. Without designated lanes, there is a chance that these robots will operate on footways, causing problems to pedestrians and especially for vulnerable groups.
- Other counties like the US have already implemented these robots in their urban spaces and robots became the targets for vandals.
- It is not clear what will be the hub for these robots, who will address the issue if they hit pedestrians or cause a car accident and how frequently they will be used. There is a need for a robust planning policy if they are to be implemented.

Appendix 1: CIHT Survey Questions

1. Do you think existing planning policies and guidance (e.g., Future of Freight Plan, Rail Freight Strategy) on freight and logistics are clear, consistent and have their intended impact?
    - Yes
    - No
    - Not sure

    With a text box (why yes/why no)

2. What are the top 3 most important needs of the 'freight and logistics' sector at the moment that will impact on planning?
3. Which 2 key things do you believe will help planning authorities to better plan for freight and logistics? (Please specify whether you refer in your answer to the central government, local government or the industry itself)
4. In your opinion, what are the 2 most positive and most negative impacts of COVID-19 on freight and logistics?
5. In terms of policies, how should the freight and logistics network be better incorporated in local transport plans, Local Plans, and in the National Planning Policy Framework (i.e., should LTPs/LPs/NPPF have any specific policies or maps of facilities/network)?
6. Which policies should be included in planning policy to reinforce our net zero ambition for freight and logistics?
7. Please rank the options below for their importance to decarbonise freight:
    - Modal shift from road to rail
    - Zero-emission last mile delivery options (e.g., e-cargo bikes)
    - Decarbonising the energy used for transport (e.g., hydrogen, renewable electricity)
    - Improving vehicle occupancy and logistics (i.e., reducing numbers of empty vans that do only one way delivery)
    - Any other option (text box)

8. There are a number of last-mile solutions for freight. Please rank the solutions from the most efficient to the least efficient:

    Cargo e-bikes
    Drones
    Light Vans
    Local 3D Printing of certain goods
    Starship delivery (i.e., small, automated robot for delivery)

9. What are the 3 key actions that should be taken within the planning system when considering the location of freight and logistics distribution centres to maximise the access to them by sustainable transport modes?