



Barker Review of Land Use Planning

Introduction

Freight Transport Association represents the freight transport interests of businesses throughout the UK. Its members range from small and medium size enterprises to multi-national public companies and are involved in all modes of transport. FTA members operate over 200,000 heavy goods vehicles, about half the UK fleet, responsible for 90% of freight moved by rail and 70% of goods shipped by sea and air. This unique multi modal mandate enables FTA to speak authoritatively on all aspects of freight based on the broader transport needs of industry in the economy.

The relationship between delivery of an efficient infrastructure for freight transport and the land use planning system in England is one of the key challenges for industry, which FTA believes impacts overall growth, productivity and prosperity of the economy. If implemented properly, a strong land use planning system can have a positive effect on the long-term sustainability of the economy.

The current system, however, is too slow and unresponsive with the existing policies and procedures of the current system resulting in lengthy delays in the delivery of new transport infrastructure. This negatively impacts productivity and stifles economic growth, creating unnecessary regulatory burdens and costs for businesses, and it is for this reason that the industry believes that the current system is in need of review.

It is imperative to businesses operating in England that the planning process is as streamlined and efficient as possible. FTA, therefore, supports the work of the *Barker Review of Land Use Planning* and welcomes the opportunity to provide the industry's views regarding planning policy and procedures to deliver economic growth and prosperity. Specifically, our response outlines the industry's views regarding:

- Regional planning;
- Transport infrastructure;
- Urban access; and
- Land use planning for airports.

Regional planning

An important problem the industry sees with the relationship between the planning system and transport infrastructure is the impact of the English regional land use planning process. Regionally we have seen the emergence of *Regional Spatial Strategies* with associated transport strategies and, where available, freight strategies. While these strategies all require Government approval there appears to be a lack of Government action to make carry the strategies through.

There is a need for more Government action to ensure that the strategies provide a forward planning framework for local authorities and reduce the "clash" of local aspirations that very often lead to uncertainty and delays in the planning process. For example Board decisions, as they relate to regional funding allocations, often encounter difficulties in setting priorities and this could be directly related to Board members local affiliations. If the *Regional Spatial Strategies* are what sets the framework there needs to be clear direction from Government that local authorities must work towards achieving a framework which will help to eliminate conflict in prioritisation and aid the overall planning process.

Transport infrastructure

Efficient freight transport that delivers to consumers and business is vital to the economy, and road transport plays a key role in achieving this by carrying approximately 83% of all domestic freight. The freight sector, however, has to rely on a transport network where it has no control, with congestion creating the biggest challenge and cost for the industry. Industry needs high quality, reliable transport infrastructure to remain competitive and generate economic growth. Transport infrastructure, however, is under pressure from rising traffic levels both on road and rail, which means journey times and the number of unplanned incidents of congestion are rising and reliability falling.

We take the opportunity of this Review to reiterate our views presented to the *Eddington Transport Study*. As pointed out in this study, modern logistics practices and efficient supply chain management lie at the heart of recent economic growth fuelled by consumer spending. Logistics allow universal availability of retail products with short lead times for replenishment and rapid availability of out of stock items whilst avoiding the high costs of inventory. Efficient logistics and freight distribution has also allowed the benefits of globalisation and outsourcing to be achieved by providing reliable links between new low cost centres of production and traditional consumer markets.

Inefficient freight transport constrains economic growth by adding to the overall costs of production and sale. A major source of additional cost is congestion manifested as a deterioration of journey time reliability. This results in more vehicles and inventory being required in supply chains, adding to the overall costs of doing business.

The critical issue for freight transport is the reliability of journey times. Round the clock availability of transport infrastructure networks and facilities, such as ports and services, is of increasing importance to enable activity to be transferred from the saturated peak to night times and weekends when overall traffic levels are lower. Industry also needs to be able to make its own informed decisions about modal choice, free from political interference. Identification of the optimal mix of modes within supply chains requires clarity and consistency of key performance indicators across all modes.

Transport is a secondary activity in the economy and its future intensity will be a product of multiple macroeconomic factors. Predicting future demand for freight transport requires the basic dynamics in society and the economy to be anticipated, as these will ultimately determine demand for goods and services, and hence the nature of logistics systems to meet that demand. Society is poor at acknowledging the link between its demand for goods and services and the activities that are required to provide them. Intolerance of goods vehicles in city centres, resistance to night time and weekend deliveries and complaints about numbers of goods vehicles on the roads are evidence of this phenomenon.

Future planning decisions must avoid the false impression that transport can somehow be controlled independently of the rest of the economy. Consumer demands are increasingly requiring the continuous replenishment of retail outlets, and this in turn requires deliveries at night and at weekends so as to avoid congested peak periods. For more freight to be carried by rail, to reduce road congestion, then sufficient capacity must be created to provide adequate rail services. For distribution activities to be carried out at night when infrastructure is less congested then social and employment legislation must be flexible enough to allow for these working arrangements. All these factors are important considerations for economic growth

and the planning system needs to be flexible and responsive to the changing priorities and demands of the economy.

The strategic road network forms the backbone of freight activity across England, and while it accounts for only 2.5% of all roads, it carries only two thirds of freight traffic and a third of all other traffic. The performance of this network is critical to an efficient supply chain and, therefore, key to maintaining economic competitiveness. This efficiency, however, cannot continue to depend on the coordination of policies and procedures among the dozens of different agencies and organisations. These bodies currently play a role in the operation of transport infrastructure the strategic network.

As external influences can constrain the planning process, industry's view is that Government needs to take control of road delivery and highway performance and provide leadership and vision, rather than seek consensus between a disparate groups of organisations. One consideration to aid in achieving this is the development of a transport hierarchy that seeks to make more sustainable and transparent decisions. This will create less debate in the planning process, requiring local planning policies to respect the hierarchy.

Industry needs a high quality, reliable transport infrastructure to remain competitive and generate economic growth. However, there has been a dramatic under investment in the road and rail networks over many decades, during which time the economy has grown steadily and people's mobility has increased. This has placed the transport infrastructure under strain. Journey times are increasing and the number of unplanned delays is rising. FTA believes that there is £12.4 billion of widening urgently needed widening on key motorway routes including the M1, M4, M6, M62, M60 and M25. At the Highways Agency's planned spending levels of £1.9 billion between 2005 and 2008 this is equivalent to 19 years of work to improve the industry's trade routes.

In addition to lack of funding, the current planning process hinders any development of new transport infrastructure or enhancements to the existing infrastructure. For example, the new M6 Toll Road was first considered in the early 1980s, however, was not opened until 2003/2004 due to the planning process. A lag of this length of time to open a new motorway without a doubt stifles economic growth and prosperity. Furthermore, new developments or improvements to existing infrastructure are also hindered by the timely process involved for approval of projects.

Urban access

Towns and cities are at the heart of a modern society, and to remain vibrant goods vehicles must be able to effectively service their shops, restaurants, pubs and bars, financial institutions, and other businesses. Overall, lorries represent less than 3% of traffic and less than 6% of largest goods vehicle traffic in urban areas. Furthermore, good vehicle traffic on urban main roads has decreased by 30% since 1992, whereas car traffic has fallen by only 1%.

Efficient deliveries are, however, hampered by delivery curfews and/or night-time restrictions. Some sites and businesses have curfews placed upon them as the result of *Environmental Health Orders* (e.g. noise levels) or because of planning issues caused by their location in residential areas. Often, the residential area was developed after the business was established, with subsequent local authority planning permission granted for housing developments. Subsequently incoming residents in the vicinity of existing businesses complain about noise and a delivery curfew or night-time restrictions are imposed, thus hindering deliveries.

A further issue for urban businesses is the need for good accessibility via the road network. When a retail business identifies a new site, one of the criteria that must be identified in the planning application is good accessibility via the road network. Often there are local resident objections to actual routing or subsequent local council Traffic Orders that will restrict access, via a prohibition on access to the roads or a ban on loading and unloading facilities. The lack of freight facilities at the delivery point is the most serious problem facing deliveries in large urban centres, in particular London. Limited kerb space is made worse by illegally parked cars and poor provision of loading and unloading bays. The system, as it currently operates, fails to properly take account the needs of delivery and service vehicles.

FTA recommends a need for comprehensive guidance from Government providing information and advice to businesses and planners regarding understanding planning constraints and proposing alternative solutions to Government on creating improvements that would benefit economic sustainability and growth.

Land use planning for ports

Another concern for the freight transport industry relates to the policies and procedures that exist for land use planning for ports. In particular, industry is concerned about the lack of regulation concerning land use around airports and the complexity of the regulatory process for sea ports.

In relation to airports, industry concerns relate specifically to the lack of regulation concerning land use around airports, which becomes problematic in the case of express carriers that operate primarily during the night, in order to meet the demands of customers.

In the current environment, residential expansion takes place in relative close proximity to existing airport structures, and results in increased costs for businesses as plans must be put in place to mitigate against noise. Any expense that is incurred by the airport authority is subsequently passed on to the business customers operating from the airport; businesses in turn pass these costs on to their end-user customers.

The United States, for example, has recognized that proper land use planning for airports requires an in-depth understanding of airport operations and how those operations affect, and are affected by, surrounding land use. This includes stringent government policies and state laws that vary across the US, according to whether airports are publicly or privately owned. Most states will require the development of *Airport Land Use Compatibility Plans*, which will typically include details of the anticipated growth of the airport during a 20 year period, and may set out specific height restrictions on buildings, specify use of land, and determine building standards within the planning area. Furthermore, the Federal Aviation Authority has developed guidance documents for land use planning, including the publication *Land Use Compatibility and Airports, a guide for effective land use planning*.

FTA recommends that Government develops guidance for local authorities around land use planning to ensure that expansion of residential buildings cannot continue in close proximity to existing airport terminals.

The concern for sea ports also relates to the regulation for expansion, however, it regards the complex nature of this regulation. The current process for expansion or new development is a lengthy process of extensive consultation that can take on average up to 12 months to complete. This process consists of extensive

administrative burdens that can prove to be costly to business, as often multiple reports and surveys are required to be completed and submitted to numerous different bodies, which may require slight differences in the same report across all these organisations. For example, an Environmental Impact Survey may be required by several different Government agencies or departments and each may require a different element or different standard to one particular element.

The industry does not suggest that the process should be less rigorous, however, to reduce the regulatory burden on business FTA recommends that the process needs to be more structured. There needs to be a common approach and standards, perhaps overseen by one Government body that disseminates the information to all agencies and departments that need to review the information. Reducing the duplication of materials required to be submitted by businesses to Government could reduce the unnecessary costs and delays associated with the planning process for sea ports.

Recommendations

In order to improve land use planning policy for England, the freight transport industry recommends Government consider:

Implementing a system that is more responsive to business needs and that can make decisions quickly

Reducing any unnecessary administrative burdens and costs for businesses

Implementing necessary action to ensure regional planning strategies provide a forward planning framework for local authorities and reduce competing local aspirations

Ensuring future planning decisions avoid the misconception that transport can be controlled independently from of the rest of the economy

Taking control of road delivery and highway performance, and providing leadership and vision rather than seeking consensus between numerous groups of organisations with competing needs

Developing a transport hierarchy that seeks to make more sustainable and transparent decisions and ensuring local planning policies respect this hierarchy

Developing and maintaining comprehensive guidance to provide information and advice for businesses and planners so that they can clearly understand planning constraints and propose alternative solutions to create improvements

Creating guidance for local authorities to ensure expansion of residential buildings does not continue in close proximity to existing airport terminals

Introducing more structure for processes related to sea port development to create a common approach and standards overseen by one Government body to ensure all necessary agencies and departments receive the same information