

Ms Kate Barker  
Barker Review of Land Use Planning  
4/E1  
1 Horseguard's Road  
London SW1A 2HQ

12-18 Hoxton Street, London N1 6NG  
Tel: 020 8241 9982  
email: philippa@freightonrail.org.uk  
website: www.freightonrail.org.uk

45

22nd September 2006

Dear Ms Barker

### Transport Planning and Transport Infrastructure

Freight on Rail would like to comment on delays in planning transport infrastructure, which was a theme in your interim report.

We believe that many of the problems with delay in implementing infrastructure, especially transport, can be traced back to lack of a clear national dimension to spatial strategy. A national over-arching spatial plan informs both regional, via the Regional Spatial Strategies, and local policy, via Local Development Frameworks.

The lack of a substantial spatial framework at national level has severe implications for transport:

- a) There is no framework for defining and prioritising transport projects of national or international significance;
- b) Regional policy needs strong national guidance.
- c) Funding priorities are led mainly by scheme level appraisal of value for money. This means that national priorities are an output rather than an input to the regional pattern of expenditure;
- d) It leads to inconsistent decisions and long drawn out planning inquiries.

Taking the recent examples of port expansion, the lack of any overarching policy framework meant that the issues of need for projects had to be fought out repeatedly; only after three recent major inquiries into port expansion plans has the Government committed itself to producing a ports policy.

White Papers can provide clarity on national needs and should provide a context within which local and national needs can be weighed up. A national policy framework can also help to rule out some proposals at an early stage.

A current example where more national guidance and analysis is needed is over rail freight terminals, with significant proposals being advanced by private developers. In the absence of national policy, these decisions will be decided by local interests with national policy considerations coming only after potentially lengthy inquiries and then only a case-by-case basis. The L.I.F.E. public inquiry was long-winded and costly for the industry and failed largely due to lack of national and regional policy. It also discouraged prospects for developing similar schemes as the private sector was hesitant about taking forward similar rail freight interchange projects.



RAIL FREIGHT GROUP

Railfreight



Freightliner



Setting the right national regional and local planning framework for rail freight is crucial and that is why Freight on Rail, a partnership of the rail freight industry, the transport trade unions and Transport 2000, was set up to work with regional and local authorities to get the right spatial planning policies in place. To make provision for rail freight, authorities need to identify and protect existing and disused sites, lines and sidings with potential as suitable interchange locations. In particular, planning permission for rail interchanges, without which rail freight will find it more difficult to increase, will not be secured unless the right policies are enshrined in the spatial planning framework at national, regional and local levels and the national and regional benefits of rail freight spelt out.

National rail freight planning guidance is needed if strategic rail freight sites are to be protected for this use, otherwise these sites will loose out in the market-place to housing and retail. The lack of a rail agency now makes detailed rail freight planning guidance all the more crucial to protect strategic sites and routes. This policy document would give authoritative guidance on strategic rail freight interests for planners at local, regional and national levels. It will aid in the preparation of planning strategies at

- Regional levels i.e. Regional Spatial, Transport & Freight Strategies
- At local levels i.e. Local Development Frameworks, Unitary Development Plans and Local Transport Plans
- At Public Inquiries and Examinations in Public, a role previously performed by the SRA.

Without the support of the SRA, the freight railhead site at Cricklewood, which is a national strategic site, could have been allocated to housing to the exclusion of rail.

The lack of a rail agency has severe implications in planning terms for the railways as it means that there is no rail representation at Public Inquiries and Examinations in Public. In the case of roads the Highways Agency represents road interests at Public Inquiries and EIPs. The Highways Agency also has regional representatives who comment on Regional Spatial Strategies and Local Development Frameworks in a proactive way in contrast to the railways which can only be reactive in planning terms by and large.

### **PPG13 Protection of transport lands identified in Local Plans**

PPG13 is important in the context of protecting rail lands at a local level. This ability to protect sites at a local level is dependent on national and regional policy which enables authorities to justify protecting transport lands.

The judgment in the case of Mansard County Homes Ltd v Surrey Heath Council (Feb 2002 see our web site for full details) shows councils countrywide that they can protect disused railway land for future potential railway use, even where there is no immediate evidence of future possible use. This ruling means that authorities can protect railway sites and routes.

In summary, planning and funding need to work together so that mode share is funded and can be delivered. We believe there is a need for defined national regional and local policies so that there is certainty for developers, rail industry and authorities if planning inquiries are to be streamlined.

Yours sincerely  
Philippa Edmunds  
Campaigner



**Please address correspondence 4 Beresford Avenue, East Twickenham, TW1 2PY**

AMICUS joined Freight on Rail in July 2006