



NATIONAL VEHICLE CRIME
INTELLIGENCE SERVICE

Mr A Collinson
North Warwickshire Borough Council
Council House
South Street
Atherstone
Warwickshire
CV9 1DE

10th June 2022

Dear Mr Collinson,

Planning Application Ref: PAP/2021/0663 – Land North East of Junction 10 M42, North Warwickshire

On behalf of The National Vehicle Crime Intelligence Service (NaVCIS), I write in relation to the above planning application to set out NaVCIS' support for Hodgetts Estates' proposed development at Land North East of Junction 10 of the M42 Motorway, North Warwickshire ('the site').

NaVCIS

NaVCIS is a national policing unit that bridges the gap between policing and industry. We work hard to disrupt criminality and protect communities from the harm caused by serious, organised crime - in this instance particularly the area of freight and cargo crime.

The NaVCIS Freight team is a highly-valued partner to the haulage industry, which suffers huge financial losses each year as a result of cargo crime.

We advise and support police forces, the freight sector and the Home Office in combatting Freight crime and our data informs the (NCA produced) National Strategic Threat assessment.

Impacts of cargo crime on the UK economy

Cargo crime is estimated to cost the industry hundreds of millions of pounds each year. Based on 2019 data, it was estimated that the true overall cost to the UK economy from freight and cargo crime is over £724 million a year.

In 2021, there were 4,434 reports of HGV crime to NaVCIS and 70% of the lorries attacked were parked on roads, laybys and Motorway Service Areas (MSAs).

Freight and cargo are crucial to our national infrastructure; blockages or thefts in the supply chain can have a significant impact. Highly desirable cargos are targeted by organised criminal gangs, costing the UK millions in terms of the impact to producers, transporters and consumers. As such, the team's role is to target crime that affects road haulage and freight transport in the UK.

There are a number of fundamental issues that influence the extent of cargo crime in the UK:

- The provision of lorry parking is a national issue in terms of insufficient capacity and quality¹.
- A lack of understanding of the differences between 'safe' lorry parking and 'secured' lorry parking, and the limited provision of secured parking facilities.
 - 'Safe' lorry parking provision would be akin to parking provision found in a typical MSA.
 - 'Secured' lorry parking has active security measures that we deem will be effective against the determined criminals involved.
 - The majority of lorry parking provision across the UK is not considered 'secured'.
- Furthermore, in terms of lorry parking facilities in the UK, there are very limited lorry parking facilities that are accredited by the following:
 - Transported Asset Protection Association (TAPA) Parking Security Requirements².
 - British Parking Association ParkMark Scheme (ParkMark)³.
 - EU SSTPA Secure Parking Standards⁴.
 - For reference, there are only two TAPA accredited lorry parking facilities in the entire UK – Formula Services, Ellesmere Port and The Red Lion Truckstop at J16 of the M1, Northampton.

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NaVCIS strongly supports Hodgetts Estates' proposals for a 150 space secured overnight lorry parking facility, for the following reasons:

- From a quantitative perspective, the site is uniquely located on Junction 10 M42 (north to south) and with direct access onto the A5 trunk road (east to west) and is within the Midlands area bounded by the M1, M6 and M42 known as the 'Golden Triangle' which is the key hub for logistics activity in the UK. The specific location is identified as having a critical undersupply of lorry parking provision, which is one of the identified key factors that encourages cargo crime in the UK.
- From a qualitative perspective, because there is insufficient parking provision both locally and within the UK there is a lack of competition between parking facilities (provision of parking facilities is largely left to private enterprise in the UK, unlike in the EU where it is subsidised by the authorities) and, as such, there is very little requirement or need from operators of existing parking facilities to improve and make secure their

¹ National Survey of Lorry Parking 2017 – https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/723349/national-survey-of-lorry-parking-report.pdf

² Transported Asset Protection Association (TAPA) Parking Security Requirements - <https://tapaemea.org/standards-trainings/parking-facility-security-requirements/>

³ ParkMark Safer Parking Scheme - <https://www.parkmark.co.uk/about-the-safer-parking-scheme>

⁴ EU SSTPA Secure Parking Standards - <https://op.europa.eu/en/publication-detail/-/publication/d89d1818-4f81-11e9-a8ed-01aa75ed71a1>



current facilities on offer, leading to a stock of generally poor quality and inadequately secured facilities across the UK. Consequently, there is a need for exemplar sites such as the one proposed to significantly raise the standard of parking facilities in terms of design quality and security to encourage competition and investment into existing facilities. Without new secure and well designed facilities such as this it is unlikely that there will be sufficient impetus for operators to improve and invest in existing facilities which are running at overcapacity.

- We welcome the quality of design, security features, and capacity provision of this scheme and it is noted that a range of design measures and parameters are included as part of the Design Guide.
- The design measures, if implemented, would adhere to Level 1 TAPA accreditation requirements and also the EU SSTPA Platinum accreditation requirements, which is extremely encouraging and NaVCIS commends such aspirations.
- At TAPA accredited facilities, it is extremely rare that cargo crime incidents are reported due to increased security measures compared with a “safe” facility (such as a typical MSA) or a “secured” facility without TAPA standards, where criminals would be more likely to target over a TAPA accredited facility as a result of reduced security measures.

As such, the proposals present a unique opportunity to bring forward an exemplar secured overnight lorry parking facility that will significantly raise the bar of quality of overnight lorry parking in the West Midlands, whilst also providing a substantial amount of parking in a secured facility with potentially multiple security accreditations.

The enhanced security measures provided by the facility will in turn deter cargo crime in the area, saving local police forces potentially significant amounts of time and allow already constrained resources to be allocated elsewhere - resources that would otherwise have to be utilised to investigate cargo crime and criminal activity associated with inappropriately parked lorries.

NaVCIS looks forward to engaging with Hodgetts Estates going forward and we trust that you take these comments into account in the consideration of the planning application.

Yours Sincerely,



Head of Unit, National Vehicle Crime Intelligence Service