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Sent by email

12 November 2022

Dear Mr Collinson,

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

Logistics UK is one of the UK's largest business groups and the only one that provides a voice for the whole of the UK's logistics sector. Our role, on behalf of over 20,000 members, is to enhance the safety, efficiency and sustainability of freight movement throughout the supply chain, across all transport modes. Our members range from global businesses to national companies and regional and local SME businesses.

The logistics sector employs 2.56 million people in the UK, either directly or indirectly, accounting for 8% of the UK workforce and contributes £139 billion gross value added to the UK economy. Supply chain businesses across all modes demonstrated their importance to the economy and society throughout the COVID-19 pandemic. Teams were rightly recognised as key workers transporting essential goods, including food, medicine and construction materials to keep the country operating.

### **Driving economic growth**

As set out in the DfT's recently published *Future of Freight: A Long Term Plan*<sup>1</sup>, the Government is clear that the logistics and freight sector is central to the UK's most pressing national priorities, from building back after the pandemic, levelling up, and reducing greenhouse gas emissions. It is also a significantly growing industry - the number of people working in logistics has dramatically increased from 675,600 in 2012 to 1,250,000 in 2021<sup>2</sup>. It is therefore critical that the continued growth of the logistics sector is supported.

Logistics UK supports the proposed development of up to 100,000sqm of new, high-quality, logistics floorspace in the location adjacent to the Junction 10 of the M42 and that benefits from being rail-served by virtue of its proximity to Birmingham Intermodal Freight Terminal.

<sup>1</sup> Future of Freight: A Long Term Plan (DfT, June 2022)

<sup>2</sup> Logistics UK (June 2022) - <https://logistics.org.uk/media/press-releases/2022/june/logistics-plays-vital-role-to-levelling-up-agenda>

A development of this scale would help provide significant inward investment to the area and new employment opportunities, which the application documents suggest would comprise up to 1,295 net additional jobs and GVA of up to £104.2 million annually in perpetuity to the West Midlands economy.

### **Providing sufficient driver facilities**

Lorry parking is a priority issue for our members and the lack of suitable facilities at the roadside is often cited as one of the main reasons that people are hesitant to come and work as a professional driver, as well as by those deciding to leave the industry. By improving the facilities available, this will deliver better working conditions, helping to attract a larger and more diverse pool of talent, alongside improving public perception of the sector. Greater attention must be given to the chronic shortage of commercial vehicle parking spaces, on or close to, the Strategic Road Network. The need is for the provision of high-quality, safe and secure roadside facilities including showers, toilets and hot food.

The shortage of lorry parking facilities also impacts on local communities. HGV drivers by law must take a rest break of at least 45 minutes after a maximum of 4.5 hours of driving. They must also take legally mandated rest breaks overnight and at weekends. Failure to comply with Drivers Hours regulations is a serious road safety offence and can result in a driver losing their vocational entitlement to drive. If there are no facilities available where and when a driver needs to stop, this can result in them having little choice, but to park up in less suitable locations such as laybys or close to residential areas.

The Department for Transport (DfT) has recently published a survey<sup>3</sup> of commercial vehicle parking and concluded that the “provision of lorry parking at on-site facilities is nearly at critical level, having reached 83 per cent utilisation level across the network”. The West Midlands utilisation level was found to be 84%. This highlights the urgency of addressing the lack of adequate facilities that Logistics UK has been calling for, along with supportive measures such as addressing delays to planning applications and identification and options for sites on Government owned land.

Section 109 of the National Planning Policy Framework sets out that local planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.

Against this backdrop, Logistics UK is extremely supportive of the provision of a secure overnight lorry parking facility (of up to 150 spaces) and associated welfare facilities as part of the wider development proposals subject to application ref: PAP/2021/0663.

### **Supporting mode shift to maritime and rail**

Reducing greenhouse gas emissions and reaching net zero is a key priority for the sector. Promoting and harnessing modal shift from road to maritime and rail is vital to help achieve this.

Highly sustainable and rail-served sites, such as those subject to the development proposals, should be supported. In this case, it is noted that the site is rail-served by virtue of its proximity to BIFT with additional rail freight infrastructure at Hams Hall (c.8.7 miles).

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<sup>3</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1108154/national-survey-of-lorry-parking-2022-part-one.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1108154/national-survey-of-lorry-parking-2022-part-one.pdf)

An additional benefit of the proposed overnight lorry parking facility is that it would provide a significant quantum and higher quality of parking and welfare facilities in close proximity to two key intermodal rail hubs in the West Midlands region, further supporting modal shift.

**Conclusion**

Logistics UK supports the development proposals and I hope this feedback is useful as you consider the application.

Yours sincerely,



Deputy Director – Policy