

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

21 December 2022

Dear Mr Collinson,

PAP/2021/0663 - Land North East of Junction 10 M42, North Warwickshire

I am writing to you in support of the proposals in planning application ref: PAP/2021/0663 which include an Overnight HGV Lorry Parking Facility at the site known as Land north-east of Junction 10 M42 motorway, in North Warwickshire, currently being advanced by Hodgetts Estates.

The RHA represents more than 8,500 members who operate more than half of the UK HGV fleet, as well as coach operators and van users. We liaise with the profession and represent its interests to Government, lobbying on issues that impact on the safe and efficient movement of goods by road across the UK.

The shortage of HGV parking facilities across the UK has resulted in drivers having nowhere that is safe and secure to take their mandatory breaks and rest. This is also an inhibitor to attracting new drivers and female drivers to the industry. The legislation around drivers' hours and rest periods is rigorously enforced by the Driver and Vehicle Standards Agency and the Police. The Traffic Commissioner regulates this area.

Furthermore, it is essential from a road safety perspective that drivers are able to have a good night's uninterrupted sleep. In addition, drivers should feel safe in the knowledge that they, their vehicle and load will not be vulnerable to criminal activity. It is vital therefore that secure gated and fenced facilities are made available close to the Strategic Road Network, so that all drivers feel safe. We estimate there is a national shortage of 11,000 HGV parking spaces each night and our recently released policy paper evidences this. We attach further underlying detail and the measures the Government is putting in place to address HGV parking shortage in Annex A.

Road Freight supplies 98% of everything consumed in the UK. All food, medicine and other essential products are delivered by Road Freight. During the pandemic in 2020 and 2021 traffic volumes generally fell, the exception was Road Freight which experienced a slight decline in some sectors, but which has subsequently recovered to exceed pre-pandemic levels.

PAP/2021/0663

Given the measures now in place to address the shortage of HGV parking spaces, the RHA fully supports Hodgetts Estates' proposals for an Overnight HGV Lorry Parking facility at Land north-east of Junction 10 M42 Motorway, North Warwickshire.

This is located on the Strategic Road Network (M42 motorway and A5 trunk road); routes heavily used by HGVs for the movement of goods and freight. The A5 in particular is one of the Midlands' most important east-west road corridors, connecting businesses with ports, airports, rail freight interchanges and motorways, allowing them to access major UK and international markets.

The route connects the M1 and M6 and intersects with the M42 and M69, four of the region's busiest motorways. The A5 also sits at the heart of the so-called "Logistics Golden Triangle". The importance of appropriate lorry parking facilities on this road corridor and in this particular location cannot be understated therefore.

Furthermore, the RHA welcomes the quality of design, security features and capacity provision of the proposals and the extensive range of design parameters included in the submitted Design Guide are supported. It is understood that implementing these design parameters would mean the scheme adheres to Level 1 TAPA accreditation requirements and EU SSTPA Platinum accreditation requirements, which would create an exemplar facility of national significance.

I am sure you will agree that failure to provide correct lorry parking facilities results in HGVs being parked in locations unsuited for vehicles of this size, resulting in conflict with local communities, which is why parking is so very important. We believe councils have a responsibility to ensure that drivers and their vehicles are able to park in the knowledge that they will be safe and not in conflict with local communities.

Yours sincerely,



Annex A – Background evidence to support the need for HGV parking facilities

Quantifying the need

The 2019 Highways England Lorry Parking Demand Assessment highlights the lack of lorry parking in the West Midlands. The same issue was identified by the Department for Transport – firstly in the National Survey of Lorry Parking¹, published in 2017, which identified a utilisation of 87% in the West Midlands and 72% in the East Midlands (Table 5.1). The situation at Tamworth Services was even more acute, with a utilization rate of 92% noted at the time (Table 5.47). DfT deemed the situation as ‘Critical’ on reaching 85% utilisation and ‘Serious’ between 70% and 84%.

The latest iteration of the National Survey of Lorry Parking² published in September 2022 confirms that, nationwide, provision of lorry parking at on-site facilities remains at a nearly critical level (83% utilisation across the network, compared with 76% in 2017) (Figure E1). Furthermore, 7,318 vehicles were observed parking in off-site locations (laybys and industrial estates) - a 2% increase from the 2017 figure (Table E3).

Regionally, at 84% utilisation (Figure E13), the West Midlands is at the very top of the ‘serious’ category with 23 of the 36 on-site parking facilities observed found to be at either serious (6) or critical (17) utilisation (Figure E12). Neighbouring East Midlands is at 92% utilisation.

The proven lack of adequate rest facilities creates safety and welfare issues for HGV drivers, where stops often have to be made at inappropriate locations. We are aware this creates knock-on issues for local authorities across the country, particularly in areas of high road freight activity in and around the main motorway corridors and markets, such as Warwickshire. Local authorities often have to deal with the consequences of HGVs parking within residential areas, industrial estates and lay-bys. This can include crime and security arising from theft from the vehicles, but also community complaints and environmental issues.

Policy and Legislation

In the Written Ministerial Statement ‘*Planning reforms for lorry parking*’³, published in November 2021, the Secretary of State again reiterated the need for the planning system to play its part in meeting the needs of hauliers and addressing current deficiencies. We welcome that the WMS outlined a commitment to implementing policy change to fully reflect the importance of providing logistics and freight.

¹ DfT 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 DfT National Survey of Lorry Parking 2022 (Part One) - <https://www.gov.uk/government/publications/national-survey-of-lorry-parking-part-one-2022>

³ The Rt Hon Grant Schapps, Written Ministerial Statement (8 November 2021) - https://www.gov.uk/government/speeches/planning-reforms-for-lorry-parking?utm_medium=email&utm_campaign=govuk-notifications&utm_source=7afd55ca-5ea5-48a8-8a41-f94cdcc2ca51&utm_content=daily

One such pledge was to update the Highways Circular 02/2013, building upon the Written Ministerial Statement. The draft revisions to the DfT Circular 02/2013⁴, published in July 2022, place a clear obligation on National Highways to work with relevant local planning authorities to ensure that planning application decisions address the shortage of HGV parking on or near to the SRN, such as the M42 and A5 where the proposals would be located, and support the case to address unmet demand. We note the HGV Parking Facility Need Assessment (November 2021), submitted on behalf of Hodgetts Estates, incorporates the results of a parking beat survey which demonstrates the existing unmet demand for HGV parking in the vicinity of the application site.

At a local planning policy level, the recently published North Warwickshire Local Plan September 2021 provides further policy support for such facilities, at Policy LP34 Parking.

At a national level, various letters and statements have been issued by Government in over the past two years (some of which are referenced above) regarding the national shortage of HGV drivers and measures to attract existing drivers back to work and over the medium term, attract new drivers to address the shortfall. In all of these, the clear message is that Government will work towards improving the quantity and quality of overnight facilities and access to facilities during the day. Furthermore, that the industry must play its part to improve working conditions for drivers and, in this regard, industry-led action, such as that now being brought forward by Hodgetts Estates, will be supported.

In response to the overwhelming need to address the chronic issues facing the freight industry, the DfT published the *Future of Freight: A Long Term Plan*⁵ in June 2022.

The Future of Freight Plan is the UK Government's and industry's joint response to the challenges facing the sector. The Plan recognises that the industry is private sector funded and operated, but that public sector transport and infrastructure investment and local government positive planning support are essential to successful freight movement, which itself is essential to the UK economy and all our lives.

The Future of Freight Plan sets out a number of challenges that changes to the planning system can address, including "*How the requirement for HGV parking can be better facilitated within the planning system, particularly at freight sites such as distribution and logistics centres...*".

The importance of the freight sector nationally adds to the weight that must be given to the Future of Freight Plan. The plan gives clear weight and guidance to local planning authorities (LPAs) in considering freight and logistics development at application stage.

⁴ DfT draft revisions to Circular 02/2013: The strategic road network and the delivery of sustainable development (C02/2013) - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1093964/circular-02-2013-update.pdf

⁵ DfT Future of Freight: A Long Term Plan (June 2022) - <https://www.gov.uk/government/publications/future-of-freight-plan>