

Mr J Brown  
Head of Planning  
North Warwickshire Borough Council  
Council House  
South Street  
Atherstone  
Warwickshire  
CV9 1DE

22nd November 2021

Dear Mr Brown,

I am writing to you in support of the proposals for an Overnight HGV Lorry and Coach 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 7,200 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 for Government, lobbying on issues that impact on the safe and efficient movement of goods by road across the UK. The UK has a shortage of more than 100,000 HGV drivers and there are very few female drivers. The shortage of HGV parking facilities across the UK has resulted in trucks 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.

It is an established fact that fatigue is a significant causation factor in many collisions. It is essential, from a road safety perspective, that drivers are able to have a good nights uninterrupted sleep. Also, to be 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, especially female drivers, feel safe. New drivers to the profession are unlikely to say if they feel threatened. We estimate there is a national shortage of 11,000 HGV parking spaces each night, the majority being in the Midlands and South East.

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 experience a slight

decline in some sectors, but which has subsequently recovered to exceed pre-pandemic levels.

The 2019 Highways England's Lorry Parking Demand Assessment highlights the lack of lorry parking in the West Midlands. The same issue was identified in the Department for Transport – National Survey of Lorry Parking, published in 2017 – the survey took place in 2016 – 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). Department for Transport deemed utilization as 'Critical' on reaching 85% utilization and 'Serious' between 70% and 84%. The 2017 figure will have now been exceeded and five years on from the survey, we consider will have breached 100%. Currently Road Freight volumes on the Strategic Road Network are running at 110% of pre-pandemic traffic volumes, so lorry parking is in even greater demand.

I was recently interviewed as part of Highways England's Roads Reform Evaluation. During this interview I was critical of the lack of progress in facilitating more lorry parking spaces, since the Lorry Parking Demand Assessment was published. We will continue to keep the pressure on National Highways to ensure drivers have proper, safe and adequate rest areas.

In response to evidence submitted by the RHA and others to the Ministry of Housing, Communities and Local Government (MHCLG), the National Planning Policy Framework July 2018 (NPPF2018) for the first time included support for the provision of adequate overnight lorry parking facilities and required Local Planning Authorities to take into account local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance (para. 107). This paragraph was taken forward in NPPF2019 and again in NPPF2021 (para. 109). 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 recent months 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.

The RHA fully supports Hodgetts Estates' proposals for an Overnight HGV Lorry and Coach Parking facility at Land north-east of Junction 10 M42 Motorway, North Warwickshire, which is located on the Strategic Road Network and 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 cannot be understated therefore.

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. Councils have a duty of care to ensure that drivers and their vehicles are able to park safely in the knowledge that they will be safe and not in conflict with local communities.

The lack of a choice of high quality secure lorry parking and driver facilities is one of main reasons for the existing national driver shortage, particularly in attracting new and female drivers. HGV drivers having difficulty in finding suitable parking is stressful and time consuming. Having more and better driver welfare facilities is essential to solving this crisis.

Yours sincerely,



Tom Cotton  
Policy – Infrastructure England and Wales  
RHA

