

# Written evidence submitted by Logistics UK to the Planning and Infrastructure Bill Committee (PIB52)

## Summary

- This Bill represents a significant opportunity to improve the efficiency of the planning system. To maximise economic benefits, the Bill must ensure that logistics development is not an afterthought but a core part of strategic planning. We want to see:
- Logistics embedded into strategic planning – The Bill must require authorities to assess logistics needs and allocate land for logistics infrastructure, not only housing.
- Infrastructure approvals accelerated – Faster consenting and limits on judicial review are vital to unlock investment in logistics infrastructure, and the energy infrastructure it requires.
- Logistics planned for in cross-boundary strategies – Spatial Development Strategies must integrate logistics to support a national, intermodal network serving homes, businesses, and decarbonisation goals.
- Lorry parking and land shortages tackled – The Bill should safeguard space for logistics and mandate provision for lorry parking in new infrastructure developments.
- Balanced and sustainable environmental reforms – The Nature Restoration Levy and other environmental measures are positive but must not hinder logistics growth where developments demonstrate net gains.

## About Logistics UK

1. Logistics UK is one of the country's largest business groups, and the only trade association which represents all of logistics. Our mission is to support, shape and stand up for a safe, sustainable and efficient logistics sector. Our membership of more than 20,000 includes global, national and regional businesses and SMEs spanning road, rail, inland waterways, sea and air as well as the customers of freight services, such as retailers and manufacturers. We deliver services, representation and thought leadership, helping members and policymakers to seize new opportunities for the sector and the economy as a whole, right across the country.

## About the logistics sector

2. Logistics underpins our economy and is fundamental to our way of life. It supplies our hospitals, schools, factories, construction sites, shops and homes with everything they need, everywhere, every day – nothing moves without it. The efficiency of logistics and the productivity of the economy are completely intertwined. Due to this relationship, Oxford Economics found in 2023 that getting the policy and infrastructure environment right for logistics would unlock up to £8 billion a year in productivity-led growth. However, we are not currently going in the right direction. The UK fell from 4th to 19th place in the World Bank Logistics Performance index over the past decade, largely as a result of border friction and underinvestment in transport corridors.
3. Logistics is a major sector in its own right. It contributes £185 billion to the economy each year (12% of UK non-financial GVA), is one of the UK's largest employers, providing good jobs with strong career progression – 2.7 million people (8% of the UK workforce) are employed in logistics roles, and its key hubs provide a catalyst for further growth and investment, helping places to thrive.

## **Logistics UK evidence to Planning and Infrastructure Bill Committee**

4. This Bill represents a significant opportunity to improve the efficiency of the planning system. To maximise economic benefits, the Bill must ensure that logistics development is not an afterthought but a core part of strategic planning.
5. To boost the UK's growth and productivity, our sector needs well-located logistics sites and upgraded transport and energy infrastructure, and the ability to invest in those sites – the transport and storage sector attracted £17 billion in investment in 2023. In addition, the provisions in the Bill must ensure that housebuilding and business expansion are complemented by the ability to develop suitable logistics sites, enabling communities and businesses to be efficiently and sustainably serviced.
6. We welcome the government's recent reforms to the National Planning Policy Framework (NPPF), which have strengthened the recognition of logistics as critical to economic growth and supply chain resilience. The revised NPPF's increased emphasis on freight and logistics infrastructure is a positive step forward. However, further action is needed to ensure that the planning system fully supports the development of well-located logistics sites, enables investment in transport and energy infrastructure, and integrates logistics into strategic planning decisions.

**The government has given the following objectives for the Bill and, below, we have set out what the logistics sector requires to enable these to be met.**

### **Delivering a faster and more certain consenting process for critical infrastructure**

7. Logistics UK strongly supports reforms to streamline planning and reduce delays in infrastructure development. The current system is inefficient and inconsistent, leading to increased costs for logistics operations. The Bill's proposals to modernise Nationally Significant Infrastructure Project (NSIP) consultation requirements and reduce opportunities for judicial review are welcome, as they will help accelerate critical logistics infrastructure projects. However, greater coordination is needed between national infrastructure providers across different transport modes to enable the growth of intermodal facilities.
8. Additionally, the planning system must support logistics infrastructure critical for decarbonisation, including electric vehicle charging points and renewable energy generation. Another longstanding issue is the shortage of safe and secure lorry parking facilities. Planning reforms must mandate the inclusion of lorry parking in new infrastructure developments and encourage the use of public land for this purpose.
9. Furthermore, to prevent the long, drawn-out approval processes that have plagued major infrastructure schemes, the Bill ought to go further in limiting the scope of judicial review, particularly post-approval. This would ensure all interested parties, including objectors, engage in the application process and that issues are resolved far earlier, with the remainder of the process setting a clear path towards the delivery of the scheme.

### **Introducing a more strategic approach to nature recovery**

10. We support the government's focus on nature recovery but emphasise the need for a balanced approach that does not introduce additional bureaucracy or delays to the planning process. The introduction of a Nature Restoration Fund must be carefully managed to ensure it facilitates, rather than obstructs, sustainable logistics development. Logistics infrastructure is essential for maintaining supply chains and should not be seen as conflicting with environmental objectives.

### **Improving certainty and decision-making in the planning system**

11. The planning process is widely seen as slow, opaque, and under-resourced. Delays in securing planning approvals increase costs for businesses and deter investment. Logistics UK welcomes reforms to ensure planning committees operate efficiently, maximise the use of professional planners, and improve the resourcing of local planning authorities. These measures are essential for supporting logistics developments that are critical to economic resilience and growth.

### **Unlocking land and securing public value for large-scale investment**

12. We support the release of previously developed and grey belt land for logistics infrastructure. However, we are concerned that a presumption toward housing development on brownfield land could undermine logistics growth and lead to communities lacking the core infrastructure they need to thrive. It is essential that the planning system safeguards land allocated for logistics and ensures that housing growth does not come at the expense of economic infrastructure.

13. We urge the government to revisit the idea of Brownfield Passports, which could help accelerate the development of strategic logistics sites. These would provide pre-approved planning conditions for brownfield developments, reducing delays and uncertainty. Brownfield Passports are not mentioned in the Bill, and we urge the government to reconsider this decision, rather than pursuing a non-legislative route for Brownfield Passports.

### **Introducing effective new mechanisms for cross-boundary strategic planning**

14. The logistics sector operates across the UK rather than being contained within individual administrative boundaries. Effective cross-boundary planning is therefore critical to maintaining a coherent national logistics network. We welcome the Bill's proposals for sub-regional Spatial Development Strategies, which should enable better coordination between local authorities. However, greater emphasis is needed on ensuring that logistics considerations are integrated into these strategies to facilitate the development of a resilient and efficient logistics network.

### **Specific changes we would like to see to the Bill**

#### **15. Strengthen requirements for logistics site allocation**

- Bill reference: Part 2, Chapter 2 – Spatial development strategies.
- Proposed change: Add a requirement for strategic planning authorities to explicitly assess and plan for logistics needs, including allocating sufficient land for logistics infrastructure in local plans and development strategies.
- Why: Currently, the Bill does not compel authorities to factor logistics into land-use planning with enough weight. This would help counter the housing-first bias and ensure balanced development.

#### **16. Mandate inclusion of logistics requirements and infrastructure in Spatial Development Strategies**

- Bill reference: Section 47 – Spatial Development Strategies.
- Proposed change: Include a statutory requirement for Spatial Development Strategies to consider future freight flows and intermodal connectivity, and to safeguard strategic logistics land for logistics sites and infrastructure (e.g. distribution parks, rail freight terminals).
- Why: Ensures logistics is not treated as an afterthought and supports joined-up cross-boundary planning.

#### **17. Require lorry parking in major infrastructure applications**

- Bill reference: Part 1, Chapter 1 – Nationally Significant Infrastructure Projects.
- Proposed change: Introduce a new clause requiring NSIP applications for road or industrial infrastructure to assess and provide for safe and secure lorry parking, especially where freight traffic is expected to increase.
- Why: There is a chronic shortage of lorry parking. The Bill should embed solutions into future infrastructure delivery.

#### **18. Treat EV charging and renewable energy logistics infrastructure as NSIPs**

- Bill reference: Sections 1–3 – NSIP Scope and Disapplication of Consent Requirements.
- Proposed change: Amend the NSIP regime to include large-scale EV charging hubs and hydrogen refuelling stations as eligible for NSIP status; and clarify that renewable energy generation/storage linked to logistics operations can qualify as infrastructure of national significance.
- Why: Decarbonisation of logistics depends on the rollout of such energy infrastructure, which is often delayed under local planning.

#### **19. Exempt strategic logistics sites from the Nature Restoration Levy where developments demonstrate net environmental gains**

- Bill reference: Part 3 – Development and Nature Recovery.

- Proposed change: Add a clause under Sections 61–70 allowing for exemptions, discounts, or fast-track processes under the Nature Restoration Levy where developments demonstrate net environmental gains (e.g. biodiversity net gain through the development of brownfield land).
- Why: Prevents the levy from becoming a barrier to sustainable logistics development and ensures proportionate implementation.

## 20. Reinstate and legislate for “Brownfield Passports”

- Bill reference: Could be added under Part 2 or Part 5 (Compulsory Purchase).
- Proposed change: Introduce a new clause creating a statutory framework for Brownfield Passports, providing pre-approved planning frameworks for certain classes of logistics development, binding timelines for determination, and incentives for developments that repurpose grey or previously developed land.
- Why: Unlocks strategic sites faster, reduces uncertainty, and supports investment in infrastructure close to where it’s needed.

## 21. Logistics-integrated guidance and timetables for NSIP reviews

- Bill reference: Section 1 – National Policy Statements.
- Proposed change: Include logistics infrastructure as a priority area in the National Policy Statement (NPS) review timetable and mandate guidance to ensure freight and logistics needs are reflected in all relevant NPS updates.
- Why: Ensures central government policy reflects logistics as a foundational pillar of infrastructure and growth.

## 22. Reform the DCO and judicial review process for NSIPs

- Bill reference: Could be added under Part 1, Chapter 1 - Infrastructure.
- Proposed change: Include a provision that allows Development Consent Orders (DCOs) for projects designated as critical national priorities to be approved by Parliament via a provisional order confirmation bill immediately after being issued by the relevant Secretary of State. This established procedure would ensure that the resulting Acts of Parliament – into which the DCOs would be incorporated – are protected from judicial review. DCOs should also consolidate all necessary permissions, rather than requiring parallel applications.
- Why: Limits the potential for post-consent judicial review and therefore speeds up delivery once a DCO has been made.

23. **Conclusion:** This Bill represents a significant opportunity to improve the efficiency of the planning system. However, to maximise economic benefits, the Bill must ensure that logistics development is not an afterthought but a core part of strategic planning. We urge policymakers to support reforms that enable faster infrastructure approvals, protect land for logistics, and integrate planning strategies across local authority boundaries.

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