Overnight Parking and Facilities Reform Proposals from RHA

18 May 2022

Good rest and parking facilities for all commercial vehicle drivers reflect a wellplanned, advanced, and compassionate economy. What we have now is inadequate, there is not enough and too many facilities are not good quality.

The RHA is campaigning for sufficient world-class parking facilities for commercial drivers that provide for their safety, security and welfare. Providing more and improved lorry, van and coach parking will boost UK productivity by addressing the commercial driver shortage and is a visible expression of the investment by Government and industry in this vital workforce.

Industry can do the "heavy lifting" required to fund new overnight parking facilities. However, industry needs a fit-for-purpose planning framework with improved guidance for facility developers that can support this essential investment.

This paper addresses the problems associated with the lack of lorry parking facilities. There are different (often related) issues with facilities for commercial van and coach operations. These issues will be addressed in a future paper.

The Planning Problem

There has been a long-term market failure to provide safe, secure overnight lorry parking facilities for drivers in the UK.

The industry can, and has tried, to provide and fund the parking and welfare facilities required. Regrettably, our experience is that parking plans are met with hostility, with inconsistent reasons given for rejection. This must change.

To address the market failure, planning needs to change. The current National Planning Policy Framework used by councils to grant lorry parking planning permission is not fit for purpose. Currently, it says

"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.¹

¹ Page 31, paragraph 109 -<u>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005</u> <u>759/NPPF_July_2021.pdf</u>

RHA

Planning Reform – the RHA Proposal

The National Planning Policy Framework must go much further. The current framework text should be changed to read as follows:

Planning policies and decisions should recognise the necessity of providing adequate safe and secure overnight lorry parking facilities, taking into account:

- a) local, regional and overall demand for lorry parking to meet all overnight lorry parking needs;
- b) the facilities and welfare provision needs of drivers;
- c) the need to minimise distance travelled by lorries when analysing a location, keeping local, regional and national needs in mind when making decisions;
- d) the requirements of all users of the Strategic Road Network and Primary Route Network;
- e) the benefits locally and regionally of reducing impacts of lorry parking in locations that lack proper facilities;
- f) the logistics needs and requirements of businesses, residents and stakeholders in nearby towns and areas; and
- g) the likely demand for overnight charging of electric lorries needed to meet climate change goals.

Proposals for new or expanded distribution centres and large multi-user business parks should make provision for sufficient overnight lorry parking for their anticipated use either on site or at identified locations.

This will require local authorities to take and maintain a proactive approach to assessing supply and demand for lorry parking facilities to solve the shortage locally, regionally and on the Strategic Road Network.

The scale of the problem

Our assessment is that there is a national shortage of around 11,000 overnight lorry parking places ². Allowing insufficient, sub-standard and often unsafe lorry parking to continue unaddressed is not acceptable.

We welcome the Government's announcement that it has commissioned a review of lorry parking and it is supporting that with a £32.5 million fund to improve existing lorry parking facilities. We also welcome the Government's further announcement that there is another £20 million being used as part of the National Highways' users and communities fund.

However, while welcome and helpful, public money is not the main requirement as industry can provide most of the necessary investment. Instead, what is needed is a fit-for-purpose planning system which addresses the current market failure in lorry parking provision, that is what is required to unlock the private investment needed.

Lorry parking, good for everyone

Plentiful well-sited overnight lorry parking reduces vehicle mileage on our roads, eliminates "nuisance" lorry parking for residents, reduces noise impacts, helps to fight vehicle crime and is better for drivers and employers.

Whilst laybys are essential and often used by drivers to take their mandatory driving time breaks during a working shift, they are not suitable for overnight rests due to the general lack of hygiene facilities and security.

To attract, retain and improve the diversity of drivers in the sector, drivers need to see the investment and commitment by Government and industry in the facilities they use and in recognition of the vital work they do.

Good driver facilities reflect the respect of a society and the dignity of a workforce, recognised by Ministers as economic enablers and key workers during the COVID-19 pandemic.

Lorry drivers are required by law to take mandatory breaks during their working shift and have minimum specified rests overnight. Compliance with these rules are enforced through tachographs fitted in lorry cabs that record driving and rest periods. Good lorry parking supports road safety by ensuring high quality and safe rest for drivers.

Secure driver facilities help keep crime rates lower. Drivers and their vehicles in insecure locations are targets of organised criminals. Secure commercial vehicle parking facilities are a less attractive target for organised and opportunistic criminals.

Greater provision of good quality overnight parking will reduce litter and noise disruption in areas where lorries currently park overnight without proper facilities. The current situation is unacceptable and can be resolved with the appropriate investment in formal lorry parking facilities.

Well planned and located commercial vehicle parking facilities will also assist with accommodating the demands arising from the electrification of vehicles as part of the Government's Net Zero ambitions. To accommodate the electrification plans, a charging network will be required. Commercial vehicle parking facilities can form an essential part of this charging network.

² Details of the RHA estimate can be found in annex 2. This RHA estimate if for Great Britain and is based on published 2017 – 2019 estimates for England. It excludes lay-by parking. The Department for Transport is working to update earlier assessments.

Support the RHA Facilities Campaign

RHA has launched a driver facilities petition which can be found here.³

The petition urges the UK Government to:

- Introduce a task force to review all existing driver facilities and work with industry, operators and local authorities on a long-term solution.
- Amend the planning guidance to local authorities to urge them to approve appropriate plans for new parking and facilities.
- Increase Government funding provided to improve the number of safe and secure driver facilities and parking spaces.

Summary

Road haulage exists to serve the demand created by its customers, ultimately that demand is driven by the end consumer – you and me.

It is the haulage customer who determines what level of service they need, and the price point they are willing to pay for that service.

To that end, the UK economy depends on goods vehicles existing in all areas to meet all market needs cost-effectively, efficiently, and sustainably.

The RHA strongly believes that improved driver facilities are consistent with the Government's "Levelling Up" objective to boost "productivity, pay, jobs, and living standards by growing the private sector".

The benefits of the proposed improvement to the planning system by the RHA would be immense for the haulage industry, the operators and developers of lorry parking, local residents and the drivers who need to park safely and securely.

> Tom Cornwell t.cornwell@rha.uk.net RHA 18 May 2022

³ <u>https://www.rha.uk.net/Campaigns/Facilities/Facilities-Petition</u>

Annex 1 – Standards for overnight lorry parking

Below is a summary of some of the key issues high quality overnight lorry parking providers need to address. (It is not an exhaustive list).

Toilets and showers

Toilets need to be clean, hygienic, fit for purpose and readily available. Separate female facilities need to be provided and be in sufficient numbers.

Security

High quality security is key to keeping drivers safe and preventing attacks on drivers, cargo and vehicles. Security at commercial vehicle parking locations should include adequate fencing, CCTV, active security personnel and Police rapid response where appropriate.

Environment

The environmental affect must be considered.

Noise needs to be minimised and mitigated. Commercial vehicle parking sites should provide electric points for fridge trailers/vehicles to reduce the need for engine use and associated noise pollution. Eventually, we will need to see Battery Electric Vehicle charging points and hydrogen refuelling for lorries which will form part of the national infrastructure for the decarbonisation of the logistics industry.

Refreshments

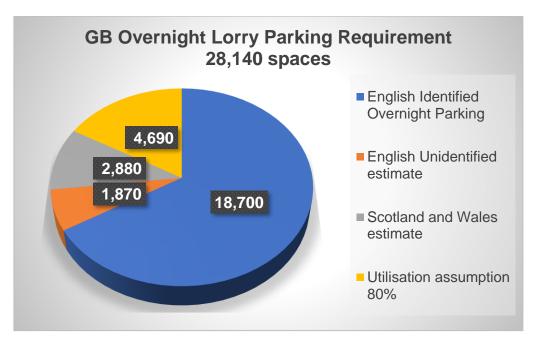
Food and refreshments need to be readily available that also focus on the health of the driver. Healthy food choices and freshly cooked meals need to be available 24/7 for drivers.

<u>Access</u>

Access to and from the road network should be designed to ensure that queuing on public roads is minimised and that the access on and off the parking site meets standards appropriate for the road being used to enter and leave the site.

Annex 2 - RHA estimation of the parking shortage

The below graphics illustrate the shortage and requirement estimates of GB overnight lorry parking.





Source: Base data from Department for Transport National Survey of Lorry Parking 2017. This survey is currently being updated and RHA will update statistics accordingly.

GB Overnight Lorry Parking Requirement – RHA Estimate.

"English identified overnight parking". The study used as the basis for our estimate measured overnight lorry parking in formal lorry parking facilities, in lay-bys and on industrial estates. That was calculated in the study to be 18,700 lorries that were parked in such locations overnight.

"English Unidentified overnight parking". The "identified" demand for parking in the study did not include parking on normal roads, parking informally off-road (parks and other public spaces) or parking on-site at private company premises. We do not have formal evidence for the scale of that parking, we know it exists so we have estimated (based on informal feedback) that such parking adds 10% to the demand for overnight parking. (more study is needed to create an accurate figure for this).

"Scotland and Wales estimate" This is a simple extrapolation of the English numbers to reflect the number of lorries based in Scotland and Wales.

"Utilisation Assumption" Running all sites at 100% is impossible. Seasonal variations, location issues, disruptions, peak days and a range of factors mean that there needs to be more places than there are lorries. We believe an average 80% utilisation is the highest average utilisation that is reasonable for a dynamic, competitive and secure system.

Therefore the total number of overnight lorry parking spaces needed in GB is estimated at around 28,140 spaces.

Overnight Parking Available and Shortfall – RHA Estimate

The parking study identified 15,012 overnight parking spaces available – in England.

That was extrapolated to include Scotland and Wales, giving a total of 17,114 spaces in Great Britain.

We have estimated the need is 28,140 overnight lorry parking spaces.

Therefore, the estimated shortfall in Great Britain is 11,026 spaces.

It should be noting that the DfT is conducting a fresh study in 2022 that will update estimates of demand and shortage.