



Response of the Road Haulage Association to the DEFRA

“Improving air quality: national plan for tackling nitrogen dioxide in our towns and cities”

15 June 2017

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Background about the RHA

1. The RHA is the leading trade association representing road haulage and distribution companies, which operate HGVs as profit centres. Our 7,000 members, operating near to 100,000 HGVs, range from single-truck firms to those with thousands of vehicles. These companies provide essential services on which the people and businesses of the UK depend.
2. We proactively encourage a spirit of entrepreneurship, compliance, profitability, safety and social responsibility. We do so through a range of advice, representation and services, including training.
3. We would like to thank the Department for Environment Food & Rural Affairs for the consultation and the opportunity to comment on the issues raised.
4. In addition to answering the questions directly we have added further comments on related issues where we feel these are relevant.

Responses to the Consultation Questions

Question 1. How satisfied are you that the proposed measures set out in this consultation will address the problem of nitrogen dioxide as quickly as possible?

RHA Response:- Dissatisfied

This question does not consider the impacts the proposed measures will have on the businesses and people who will be expected to adapt – the issue of proportionality on those impacted by restrictions must be considered.

As emissions from freight are improving rapidly, the RHA is urging caution in applying widespread Clean Air Zones to Heavy Goods Vehicles (HGVs) in the UK. The RHA’s concern is



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based on the very limited impact some area-wide measures applied to HGV's will have on improving health and local air quality, and the very high cost that will be incurred as a result of too quickly introduced restrictions.

While air quality is improving, the RHA recognises that there is a need to deal with local air quality issues that impact on people's health.

Clean Air Zones need to be based on a local understanding of the nature of "hot spots" and sources of pollution, they must focus carefully on local conditions to be effective. According to TfL, in London in 2013 HGVs were the source of 10% of NOx emissions. Buses and coaches accounted for 13%, Diesel cars 14%, Aviation 8% - Domestic and Commercial gas accounted for 19% of NOx emissions. Between 2013 and the end of 2016 the NOx emissions from the GB fleet of HGV's has fallen by about a third.

It is important that authorities implementing Clean Air Zones understand the impacts that will occur on freight movements made by HGVs in proposed zones.

We welcome some of the points raised in the proposals, such as the need to tighten controls on Van use and tougher emissions standards on machinery. We also believe this should be taken further, there needs to be consideration of tighter emissions standards on commercial and domestic gas equipment which we believe accounts for greater nitrogen dioxide emissions than transportation.

If poorly executed, Clean Air Zones will add significant costs to local businesses and consumers, will put some businesses in financial peril, and may not materially improve health or local air quality.

A recent Times article (13/06/2017) clearly pointed out that London workplaces contribute over 42% of emissions in the London area.

Question 2. What do you consider to be the most appropriate way for local authorities in England to determine the arrangements for a Clean Air Zone, and the measures that should apply within it? What factors should local authorities consider when assessing impacts on businesses?

RHA Response:- The RHA believes Clean Air Zone proposals need to focus on areas of greatest public health risk and policy makers should understand the impact of their proposals on people and businesses.

As has been demonstrated in London and elsewhere, the focus should be on clearly defined areas of high pollution, this is usually where buses and taxis are subjected to high levels of congestion.

The RHA suggests that direct Local Authority action:

- a. Should focus on vehicles creating the most pollution in pollution “hot spots”, in particular the worst performing buses and taxis – (an example of a positive approach is the London “low emission bus zones” which requires Euro VI buses are used in known pollution “hot spots” in London).
- b. Should reduce congestion in key areas of high pollution through better traffic management, smarter vehicle routing and improved roadworks management.
- c. Should encourage use of the road network outside peak periods.

Many new Clean Air Zones are considering limiting the type of large vehicle (by Euro standard) entering the Clean Air Zone, banning all but Euro VI HGVs and buses. The RHA understands the motivation for this approach, but the early banning of modern Euro V vehicles in particular will impose costs on businesses and consumers that will be grossly excessive.

Local authorities must consider the impacts local area restrictions will have on haulage companies who are delivering the food and other goods we all need.

Having assessed this approach the RHA is suggesting a notice period of at least 18 months for restrictions and fines, and a phasing of restrictions in Clean Air Zones so the vehicles with highest emissions are removed first, an example for “hot spot” areas could be;

- a. To the end of 2018, only restrict Euro III or earlier HGVs and Buses,
- b. From the end of 2019, only restrict Euro IV or earlier HGVs and Buses,
- c. From 2023 restrict to Euro VI HGVs and Buses.

We suggest that Local Clean Air Zone schemes consider exemptions for certain specialist vehicle activities. Examples could include gritting, snow ploughing, emergency vehicles and recovery vehicles – these are limited activities where vehicle replacement costs are very high and the air quality impact is negligible in areas where Clean Air Zones are being considered.

The above approach will encourage the retirement of the oldest, most polluting HGV’s while minimising the negative impacts of change businesses and consumers. Local Clean Air Zones

also need to consider other emission sources. Focusing heavily on goods vehicles without addressing other transport and non-transport sources of pollution will undermine meaningful improvement to air quality where it is needed.

The proposed measures set out in the consultation with regards to Charging schemes – will add significant financial burden to an industry that is already struggling if phasing is not done. Retro-fitting for Heavy Goods Vehicles is of uncertain value in clean air zones and will be costly.

Question 3. How can government best target any funding to support local communities to cut air pollution? What options should the Government consider further, and what criteria should it use to assess them?

Are there other measures which could be implemented at a local level, represent value for money, and that could have a direct and rapid impact on air quality? Examples could include targeted investment in local infrastructure projects.

How can government best target any funding to mitigate the impact of certain measures to improve air quality, on local businesses, residents and those travelling into towns and cities to work? Examples could include targeted scrappage schemes, for both cars and vans, as well as support for retrofitting initiatives.

How could mitigation schemes be designed in order to maximise value for money, target support where it is most needed, reduce complexity and minimise scope for fraud?

RHA Response:- Infrastructure network investment is needed in areas where there are pollution hot spots. This could make a significant difference in some locations. Smoothing traffic flows to avoid acceleration and deceleration and minimising congestion should be priorities. Targeted scrappage schemes may have a role to play in some circumstances – particularly with local buses. Care will need to be taken when introducing scrappage schemes to ensure that support given does not undermine competition or the investments already made by many companies in modern vehicles.

Big Data is available from telematics businesses and this should be used in conjunction with the above

Some funding should be aimed at assessing the emissions from workplaces, other machinery and domestic equipment.

Question 4. How best can governments work with local communities to monitor local interventions and evaluate their impact?

RHA Response:- As stated in question 8 with a phased scheme to meet Euro VI which is highly efficient and Impacts in identified hot spots should be monitored over time.

Question 5. Which vehicles should be prioritised for government-funded retrofit schemes?

RHA Response:- Retrofit may have a role to play with HGV's, but given the limited amount of time most individual HGV's will spend in clean air zones it is likely that retrofit will experience a greater take-up in the bus sector.

Question 6. What type of environmental and other information should be made available to help consumers choose which cars to buy?

RHA Response:- Information that they can trust.

Question 7. How could the Government further support innovative technological solutions and localised measures to improve air quality?

RHA Response:- Localised measures should focus on eliminating "hot spots" by improving traffic management where congestion is a problem.

Question 8. Do you have any other comments on the draft UK Air Quality Plan for tackling nitrogen dioxide?

RHA Response:- Euro VI has been the emission standard for HGVs since the beginning of 2014. The life of the most intensively used HGVs is about 10 years. For specialist and lightly used vehicles the life span of the lorry can be much longer.

Euro VI emission standards for HGVs and buses should not be confused with the Euro 6 standards used in car and van emission testing. Euro VI engines fitted to HGVs (and buses) have been tested and shown to perform to standard in real-world operation – in contrast to Euro 6 diesel engines fitted to cars and vans. Transport for London uses Euro VI HGVs and buses as the standard for its ultra-low emission zone.



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Between the introduction of Euro VI in 2014 and the end of 2016, the RHA has assessed that the NOx emissions across Great Britain from HGVs reduced by about a third. This improvement will continue over coming years. By 2019, at current replacement rates, we estimate that two-thirds of road haulage will be undertaken by Euro VI vehicles.

However, Euro V HGV's will still be on our roads in significant numbers until 2023 at least. Euro V was the standard for HGV's and busses between 2009 and 2013. Given the 10+ year life span of these vehicles it is excessive for them to be included in any wide spread restrictions before 2023. To do so will collapse residual values of these vehicles, will undermine small businesses in particular and will result in increased costs that will be passed on to consumers. Further, we do not believe that leaving Euro V HGV's out of clean air zones restrictions will have a materially negative impact on air quality when compared to including them in clean air zone restrictions. Any proposal to include Euro V HGV's in Clean Air Zone restrictions before 2023 must directly assess the air quality benefit of the inclusion of these vehicles.

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