



The Road Haulage Association

Road Haulage Association

Response to the Bristol Clean Air Zone options consultation

12th August 2019

Summary of the consultation

Bristol City Council is consulting on two proposed Clean Air Zone options. It is not clear when the council proposes to start implementing the zone. The options are complex and distinct (Option 1 applies, or Option 2 applies).

The two options are:

Option 1:

A - non-compliant (Euro V and older) lorries charged £100 each day. The charges to apply 24 hours a day, seven days a week (Other vehicle charges are Taxis £9, Vans £9, Buses and Coaches £100 - private cars will not be charged).

B - HGV weight restrictions in localised areas in the city centre: Rupert Street, Baldwin Street, Park Row/Upper Maudlin Street, Marlborough Street and Lewins Mead. To operate 24 hours a day, seven days a week. (In effect this is a total ban for lorries on those streets)

C – A ban on private diesel cars on Upper Maudlin Street and Park Row (from St James Barton roundabout to Park Street) to operate between 7.00am and 3.00pm every day. If a diesel car is driven in the ban area, a fine (unspecified as yet) would be issued.

D – Other Bus and local traffic measures and a scrappage scheme for diesel cars “based on criteria to be determined following this consultation”.

Option 2:

A ban on all private diesel cars from driving in a central zone from 7.00am to 3.00pm, seven days a week. Other measures, including a scrappage scheme, could also be included.

Background about the RHA

1. The RHA is the leading trade association representing road haulage and distribution companies, which operate HGVs commercially. Our 7,200 members operate near to 250,000 HGVs out of 10,000 Operating Centres. The members range in size from single-truck firms to those with thousands of vehicles.



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2. These companies provide the people and businesses of the UK with the goods upon which we all depend. From food and clothing through to medicines, car parts and construction material.
3. Without lorries delivering good our shops would have empty shelves. It is also worth noting that lorries are the most efficient vehicles for collecting and delivering goods for the overwhelming majority of freight movements.
4. We proactively encourage a spirit of entrepreneurialism, compliance, profitability, safety and social responsibility. We do so through a range of services, such as advice, representation, and training.
5. We work alongside policymakers and haulage companies to identify ways to move freight more efficiently at a lower cost based on our widespread knowledge and expertise in the area.

General comments about the Bristol Plans

6. The RHA has fundamental concerns about the imposition of Clean Air Zones in the way demanded by the Central Government and implemented in cities such as Bristol.
7. In simple terms, the RHA believes the blanket charging of all pre-Euro VI lorries £100 per day to enter a Clean Air Zone maximises negative impacts for businesses, especially SME businesses, and often will not do the best for air quality. Option 1 with very low charges for vans and high charges for all pre-Euro VI lorries is an example of this, we believe the proposed plans will significantly increase the use of vans.
8. The survey is difficult for a trade body to respond to, given that many questions are focussed towards residents or private vehicle user responses. We have followed the questions where we can in this consultation response. We have not responded to the electronic survey itself as it does not allow a proper response.
9. The two distinct and separate options do not appear to be effectively balanced against the requirements set out by the Central Government. **We have a very low level of confidence that either option will be taken forward in a way close to that described. If other hybrid options are developed based on these two options, or any other options are brought forward, we would expect to have a further consultation based on any new proposals.**
10. Our confidence is further undermined by the statement in the technical notes which says “Because of how close together these dates are, more technical modelling on each option (known as sensitivity tests) is needed to reach a definite view on which option would reach compliance in the shortest possible time”.

11. The consultation statement about an HGV “Weight restriction” misrepresents the proposal – all HGVs operate over 3.5 tonnes so all HGVs are proposed to be banned in “Rupert Street, Baldwin Street, Park Row/Upper Maudlin Street, Marlborough Street and Lewins Mead”. 24 hours a day, seven days a week. The below screenshot from the council web site illustrates the issue.



12. Banning HGVs from these roads will prevent construction and demolition on all these roads. Access to the hospital will be restricted and local businesses will be forced to use many more small vans for collection and deliveries across a wide area – not just on those streets.

13. A charging clean air zone has never been a ‘magic solution’ to address poor air quality. Many local authorities have concluded that the operating cost of a charging clean air zone can higher than the income generated. Many local authorities have failed to secure the funding they need to mitigate the negative impacts of a charging clean air zone.

RHA response to questions (as per the online survey)

Q 1. How concerned are you about the impacts of poor air quality in Bristol on your health and the health of your family?

A. Very concerned

2. How do you think Option 1 Clean Air Zone (private cars not charged) would affect you? (Please tick all that apply)

A. There was an option “Other” on the survey which we would have selected.

The RHA is not responding as an individual company, we are responding based on the impact across the road haulage sector.

Different operators will be impacted in different ways. The Euro VI only standard with heavy charges of £100 per day will have a massive impact on many haulage companies servicing the city.

Around 42% of lorries in GB will be Euro V or earlier at the end of 2020. Mostly in the hands of SME businesses. They have already had the value of their existing lorries dramatically reduced by the threat of charging Clean Air Zones. They will have a choice – pay to pollute or refuse to trade in Bristol or upgrade to a new lorry at their own cost.

It will also be the case that businesses adjacent to the zone will be impacted as the zone will prevent lorries from accessing some local garages and other businesses.

3. How do you think Option 2 Diesel car ban would affect you? (Please tick all that apply)

A. No direct impact on lorry operators.

4. To improve air quality to legal standards, we have to reduce pollution from road traffic.

For each of the options, we want to know if you think it is a good way to improve air quality in Bristol. Please say if you agree or disagree with each of the following statements (you can tell us that you agree with both options, disagree with both options or agree with one option and disagree with the other).

A. The question is inappropriate in this consultation in this way as it requires technical knowledge about the topic that even the consultation itself acknowledges is unknown at this time.

5. Please tell us why you agree or disagree with each option.

A. Please see the response to question 4.

6. Please tell us if there are small changes to the boundary of the proposed Option 1 zone which you think we should make:

A. Our concerns relate to the way the Clean Air Zone is implemented in general - as a blanket single charge level for all pre-Euro VI lorries. We oppose the banning of HGVs from the

selected streets under option 1 as this will disproportionately impact HGV operators and the businesses that depend on them – not just in the streets operating the ban, but more widely in the city.

7. Please tell us if there are small changes to the boundary of the proposed Option 2 zone which you think we should make

A. As per Question 6. We oppose the banning of HGVs from the selected streets under option 1 if it were to be applied under option 2. This will disproportionately impact HGV operators and the businesses that depend on them – not just in the streets operating the ban, but more widely in the city.

8. Please tell us if you think the following groups should pay no charge or receive a discount or pay the full charge to drive an older, more polluting (non-compliant) vehicle in the Option 1 Clean Air Zone.

A. Our comments relate to HGV proposals only. The entire concept on the Clean Air Zone as applied to HGVs is flawed. Offering piecemeal discounts or waivers for some selected local operators will be good for them but will distort competition. The location of the base of the operator should not be a factor. (The same would apply for vans that also operate in a commercially competitive environment).

9. Which of the following additional changes do you think are needed to make the Clean Air Zone and diesel car ban successful?

Please tick up to four which you think would be most important for Option 1 Clean Air Zone (private cars not charged) and four which you think would be most important for Option 2 diesel car ban.

A. No comment.

10. If you have any other comments or suggestions about the Traffic Clean Air Zone proposals, please tell us here.

A. The RHA has outlined views about Clean Air Zones and highlighted flaws in the demands of the Central Government. We suggest that policymakers in Bristol review our paper outlining the benefits of a phased approach to Clean Air Zones. This can be accessed at <https://www.rha.uk.net/getmedia/e34a84a9-73f7-40dc-a286-3f616fa61f2f/180706-CAZ-Alternative-V3.pdf.aspx>



11. What is your full postcode, e.g. BS9 3JZ?

A. We represent haulage operators nationally, including Bristol.

12. How do you normally travel for most of your journeys in Bristol?

A. N/A

13. Which of the following best describes you (please tick all that apply)

A. Other - Trade Body representing operators of HGVs.

14. to 24. Personal responder questions – Not applicable to a trade body response.

The RHA's arguments against introducing a £100 charge for heavy goods vehicles

We are highlighting the following arguments against this policy:

A. There is no Retrofit

The UK Government authority on clean air - JAQU – assumed that lorry operators would have an option to upgrade HGVs to Euro VI from earlier Euro standards. Ignoring the advice from the RHA and others they based the impacts of their proposals on such systems being available. They are not available for any standard lorry types at all.

Retrofit has been shown to be commercially undeliverable even though there are over 100,000 Euro V lorries as a potential market. In addition, for technical reasons, an upgrade retrofit to Euro VI cannot be available for a single lorry in less than 1 year.

In effect, retrofit as outlined by the Government's Joint Air Quality Unit does not, and will not exist.

B. Charging all per Euro VI lorries the same makes no sense

Broadly speaking a Euro III lorry emits two and a half times the NOx of a Euro V lorry. Charging them the same is irrational – encouraging the replacement of older Euro III lorries with far cleaner Euro V lorries will be lower cost for operators and will result in air quality improvements.

It does not require active management – just differential charging (such as £50 for Euro III and £9 for Euro V).

C. The take-up rate for Euro 6 HGVs is already high and contribution to pollution is low

Data published by the National Atmospheric Emissions Inventory (NAEI) and Department for Transport show that HGVs contribution to roadside NO_x emissions has decreased from 30.10% to 13.24% between 2010 and 2016 (Please see Figure 1). The downward trend is expected to continue as older vehicles are being replaced by cleaner Euro 6 vehicles.

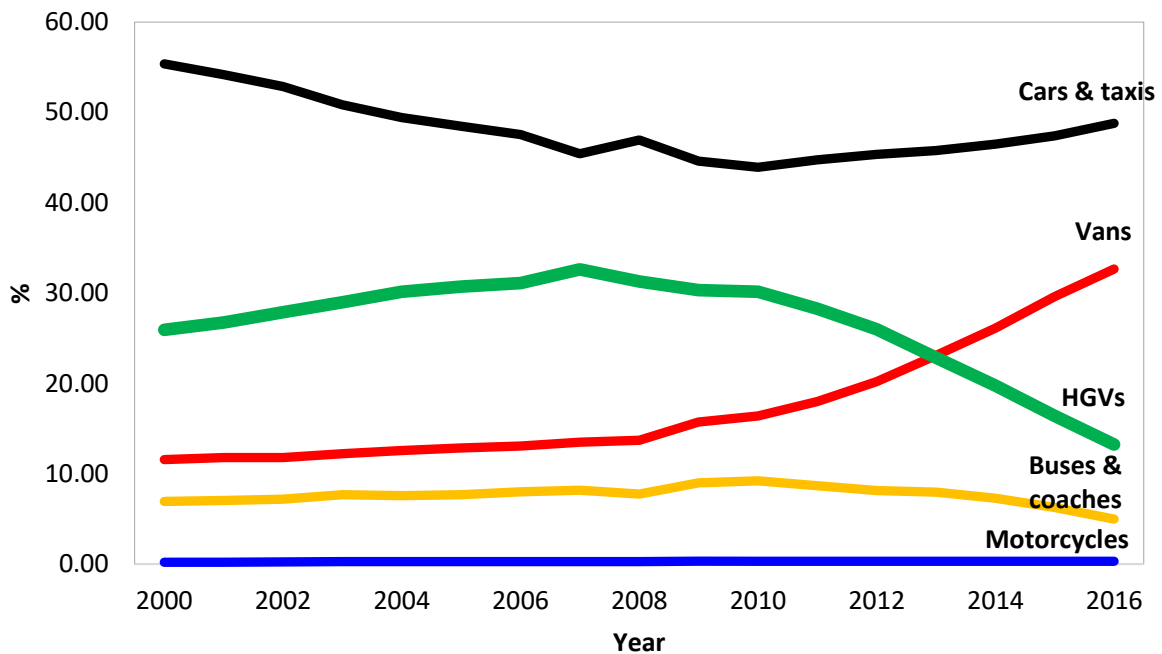


Figure 1: NO_x emissions of the United Kingdom by travel mode between 2000 and 2016, Data source: The Department for Transport.

D. Implications for SME businesses and small operators in and around Bristol

The implications of increased operational cost as a result of a clean air zone charge for HGVs and the banning from several key city centre roads will vary from operator to operator. However, small operators with a low-profit-margin are more likely to be affected by clean air zone charging policies as they often have older “second user” vehicles. We carried out a short survey among our members and asked, “Will you enter clean air zones if you have to pay a fee?”. The survey results show that

most of the operators (78.33%) were unwilling to enter charging clean air zones ($n = 60$). In support of this argument, we refer to the following as stated in the Strategic Case, page 69:

“small businesses operating to tight margins and low-income sole traders may struggle to afford to upgrade their vehicles or pay the charge”.

E. Increase in van use in Bristol

The clean air zone charge proposed for HGVs is out of all proportion to that proposed for vans. Many operations will shift to using several vans to replace a single HGV. One 44-tonne HGV has a capacity equivalent to 12 large vans of up to 3.5-tonne capacity. The replacing of HGVs with vans will cause more congestion and eventually cause more air pollution within the clean air zone.

F. Bristol losing the vitality as an economic hub

Haulage operators and the support businesses impacted by the zone may either go out of business or decide to move out of the clean air zone. This will directly undermine the economic activity in the zone.

According to a study conducted by Oxford University (Whitehead, 2002):

“if a scheme results in fewer trips to a charged area, its economic and social vitality may be reduced. In the longer term, if the investment is redirected from a charged area to its uncharged periphery where there are no charges, the core area may in time lose its importance as a hub of retail activity.”

Recommendations

The RHA recognises the need to improve air quality quickly. Our concerns about the current plans are that the effectiveness could be improved, and the economic impact reduced, through using the tools at the disposal of the Council in a much better way.

We would urge to clearly consider the negative impacts of the charging CAZ on haulage operators, local environment and the economy as illustrated above and consider the following suggestions:

1. Phase charging across the HGV Euro classes. Under option 1 do not charge Euro V lorries any more than the van charge. (This approach will minimise the switch to vans).
2. To exempt all HGVs from the charging in the clean air zone during off-peak hours;
3. To provide easy to apply financial support for haulage operators to replace their non-compliant HGVs;
4. Do not ban HGVs from any of the proposed banned roads under option 1; and
5. Use other non-charging measures to reduce NO₂ emissions, such as:



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- Encouraging out of hours deliveries;
- improving road management;
- allowing freight vehicles to use selected bus lanes (where safe and where they have a provable benefit for air quality; and
- improving public transport to reduce car use.

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Duncan Buchanan

Policy Director – England and Wales,

Fahmida Khandokar

Policy Analyst and Researcher

Road Haulage Association

f.khandokar@rha.uk.net