



## **Response of the Road Haulage Association to the Commons Transport Committee.**

### **Urban Congestion Inquiry**

**9 December 2016**

#### **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.

#### **Key Issues**

3. Ensuring road safety is a key driver within the Road Haulage Association membership. It is a sector that invests heavily in training drivers to work safely. This is supported by rigorous safety rules that apply to how companies are run and how vehicles are used.
4. Infrastructure, how it is designed and how it is used, has a direct impact on the safety of road users.
5. Congestion in urban areas is also a major concern at the current time. At current levels, it undermines the competitiveness and productivity of the UK economy.
6. Congestion is punishingly wasteful for everyone, it increases local air pollution, increases driver stress, results in more vehicles having to use the roads to deliver goods, makes bus and other journeys unreliable and increases conflicts between different road users. The allocation of road capacity needs to take account of the needs of all people and businesses in urban areas. This allocation should be evidence based wherever possible and needs to be comprehensive in taking account of the needs of the community as a whole.

7. The RHA often sees policies implemented that result in unintended consequences that have a negative impact in areas outside of the policy issue being addressed. On many occasions we do not believe that infrastructure providers are rigorous enough in considering these things as they tend to narrowly focus on just the core policy issue in hand.
8. An example is speed bumps. As well as slowing traffic they increase vehicle emissions, increase noise and vibration for residents, slow ambulances and busses, and, are expensive to maintain for local authorities. Our contention is that if the negative consequences to all people and businesses, to all modes of transport, were fully understood before implementation there may well fewer better designed, better placed speed bumps.

## **Issues of interest to the Committee**

### **Bus Priority Measures (including bus lanes)**

9. We recognise the benefits of bus lanes in urban areas. When done well they improve the urban environment by speeding bus travel. It is also good use of the road space for bicycles, motorbikes and licenced taxis to use the lanes. However, we do observe that there are some potential improvements that should be evaluated.
10. Bus lanes are often inconsistent in the times when they are active and that the range of times can be confusing for other road users. We believe that there should be no 24 hour bus lanes. Some bus lanes should be opened up for use by Heavy Goods Vehicles. An example where this should be considered is the “red route” network in London.
11. An initiative that may make bus travel significantly more attractive would be the provision of wifi on urban bus networks. This is provided in some areas, however, the offer is not widespread. (This will need to be considered alongside an assessment of 5G mobile network provision).
12. There is a bus lane safety and design issue relating to vehicles that are turning left into side roads across bus lanes. The RHA would like to see space within the bus lane allocated for the use of left turning vehicles, our estimate is that 20m (about the length of a cricket pitch) would make turning left off a road with a bus lane much safer for all road users. (please see Figure 1 below for illustration).

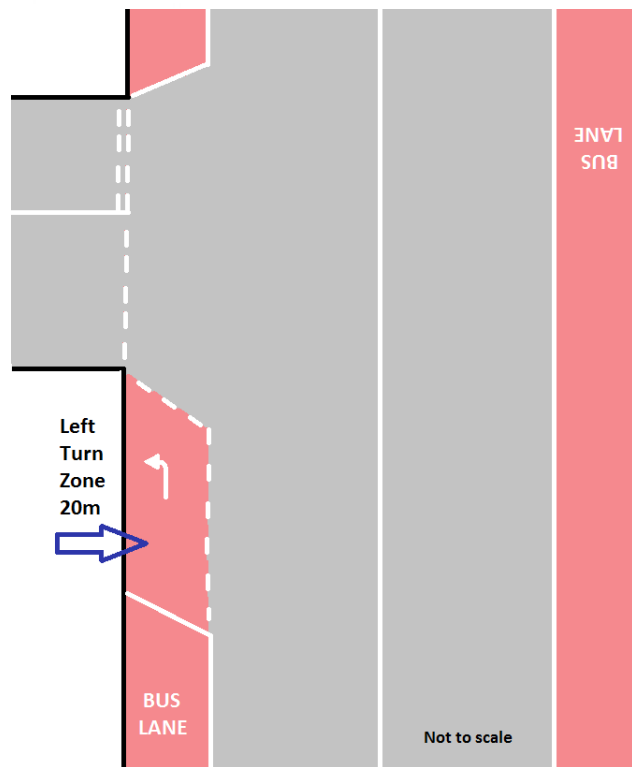


Figure 1, Left turn zone in bus lane.

## Local road pricing, including lessons from the London congestion charge and low emissions zones.

13. It should be noted that EURO VI emission standards have been in place for all heavy duty vehicles since 2014. EURO VI standards for heavy vehicles should not be mixed up with the EURO 6 standards for cars and vans. The Euro VI standard is recognised as effective in real world operation, even to the extent that TfL categorises them as Ultra Low Emission. This is because the test standard was changed at Euro VI.
14. As the fleet renews over coming years, policy makers need to ensure that they do not waste money on low emission zone systems for trucks when few road haulage vehicles will not be at the highest standard available by 2024. The challenge remains for Euro 6 diesel cars and vans, which (in contrast with the equivalent trucks and buses) are not yet operating to standard in real world conditions.
15. The RHA believes that the focus for environmental improvement should be on the vehicles that are most heavily used in urban areas where people are living. Accelerating the uptake of ultra low emission buses and taxis will have the greatest impact on local air quality as they are so heavily used. In London, buses do eight times more miles per vehicle per year than HGVs.
16. There is an almost total lack of on-road enforcement of any emission standards. There is a reliance on the MOT to provide some provide some assurance. The

removal of diesel particulate filters from EURO 5 diesel cars is a known problem, but the extent is not known. It is suggested that on road enforcement is considered, perhaps focussed on known hot spots, to detect DPF removal.

17. There is also a difficulty in ensuring that non-UK road haulage operators comply with low emission and congestion zones. It is not always possible to find out from authorities what the level of compliance is, nor how many fines are avoided. There should be more transparency on this issue.

## **Cycling and walking infrastructure**

18. It is important that pedestrians, cyclists and bus users feel safe and secure when they travel around urban areas. Good infrastructure helps with this.
19. However, initiatives and investments need to ensure that they do not make congestion unnecessarily worse. All schemes need to be rigorously evaluated to make sure that other road users can still use networks. There have been examples where the needs of other road users have been ignored – where access for people and business has been limited in gross and excessive ways.

## **Technological innovations such as intelligent transport systems and telematics**

20. The UK can make substantial gains through the greater application of intelligent transport systems (ITS) and telematics by infrastructure providers and road users, especially goods vehicle operators. This is true throughout the road network, not least in urban areas. The potential benefits are relevant to the concerns of central government the Department for Transport (carbon), DEFRA (air quality) and BEIS (productivity), and there are parallel benefits to devolved and municipal authorities.
21. The potential of ITS appears to be insufficiently recognised by government. Much more could be done, for example in the re-phasing of traffic lights to reduce delays, to provision of information on current hold-ups and the provision of information on the extent of future anticipated delays.
22. Operational pressures on goods vehicle operators is intense, to get collections and deliveries made within the service requirements of customers and the regulatory restrictions imposed by infrastructure and planning authorities. Satnav systems already bring significant benefits for individual drivers of all vehicles in congested urban areas. The problems with regard to HGV satnavs are recognised but nonetheless they still make a positive contribution, especially for distribution vehicles making multiple deliveries. Their intelligent use should be encouraged.
23. Telematics provide a means of monitoring and managing costs, driving style, routeing and loading efficiency and other factors that were unavailable to operators

until recently. The industry is starting to adopt the available technology but could do a lot more. There is no market failure but the industry could be doing far more than it is. There is a mis-conception that larger operators are already using telematics effectively: some are, but plenty of larger, as well as smaller firms are not.

24. The RHA is urging government to help fund a programme to accelerate the uptake and effective use of telematics through an education, awareness and training programme that would cost little but bring gains of interest to several government departments. The programme could be tailored to smaller operators but many larger operators would also benefit. A great deal could be achieved with £1 million, within the context of making UK goods vehicle operators and their suppliers world leaders in the application of advanced digital technology.

### **Managing disruption to local communities and businesses during construction and operation (including construction and operating costs).**

25. There is a real problem effectively managing network disruption. There is appalling congestion caused by disruptions at times. It appears that infrastructure providers do not care about the congestion and delays they cause.
26. The impact on road users needs to be a much higher priority when developing schemes. It appears that infrastructure providers focus on the simple cost of construction rather than the whole impact of their proposals. This issue applies to new schemes, upgrades which seem to drag on, and to routine repair.
27. It is recognised that it can be difficult to manage unexpected incidents that occur without notice. Even so, infrastructure providers do have a responsibility to try and ensure disruption is kept to a minimum and they should be more effective than they are now in doing this. Keeping networks functioning with the minimum of congestion needs to be a higher priority than it is now.
28. Planned works on the road network often take far longer than they should. Advance notice of disruption is essential.
29. Infrastructure providers need to take account of the cost of congestion, the wider impacts on road users, not just the cost of the construction. Speed of work vital.

### **The safety of road users, particularly cyclists and pedestrians**

30. The safety of all road users is recognised by everyone as a vital responsibility, particularly the safety of vulnerable road users.
31. Probably the biggest single safety factor is the road user behaviour. We need to ensure that road users have a clear expectation about how they and other road users are expected to behave when using networks. Driver and rider standards are

critical to this. Ongoing training is already compulsory for HGV drivers and the sector recognises that there needs to be a permanent commitment to this.

32. Improved public information for cyclists and pedestrians will help, currently there is little information and advice given to pedestrians in particular, this should be corrected, perhaps aiming at bus users initially.
33. On curb side infrastructure there has been a noticeable improvement in recent years, in particular the reduction in roadside clutter at some junctions. However, there needs to be an ongoing commitment from infrastructure providers in ensuring that the infrastructure design does not import extra risk for road users or collapse road capacity.

## **Other Urban Issues**

34. Some junctions and access restrictions result excessive fines for road users. We contend that the high level of fines in some cases indicates that there is a network design issue. Long vehicles such as busses and lorries can be in the position where the infrastructure is so poorly designed that a fine will be inevitable for a significant part of a day.
35. We would like to see an obligation on infrastructure providers to redesign any junction or access restriction at sites where fines generate an income over £100,000 pa as we believe this indicates an infrastructure failure, not a disregard of the restriction or a compliance failure.

## **Final Comments**

36. The safety of road users goes hand in hand with the infrastructure provision, the behaviour of those using the network and the design of vehicles. All these areas need to be addressed. The area that can be of the greatest impact at a local level is when dealing with how people behave when they interact with infrastructure they meet as they move around. Dealing with vehicle design is something that needs to be addressed in the long-term at a national and international level.

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