



# The Road Haulage Association

## **Road Haulage Association**

### **Response to Leeds - Specialist Heavy Goods Vehicles (Specialist Vehicles) Clean Air Zone exemptions**

**23<sup>rd</sup> August 2019**

#### **Summary of the consultation**

Leeds City Council are consulting on exemptions from Clean Air Zone charging for specialist types of Heavy Goods Vehicle. This follows earlier consultations on proposals for clean air zone charging in Leeds.

#### **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.
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 exemptions for specialist lorries.**

6. The RHA has opposed the way Clean Air Zones have been applied under the direction of Defra and the JAQU. We believe that fundamental mistakes were made early on and that the impact

on businesses, in particular SME haulage businesses, was grossly underestimated at best, and disregarded totally at worst.

7. As we have said in the past, phasing based on the standard economic life of a lorry (around 12 years) should have been the starting point for any CAZ interventions. That remains our view.
8. The RHA welcomes Leeds consideration of exemptions for specialist vehicles. One of our serious concerns has been the “one size fits all” approach which will result disproportionate impacts on some operators, so it is refreshing to see a more considered approach being taken. We thank Leeds City Council for acting in this area. We hope other cities follow Leeds leadership on this.
9. 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, this paper is our response.

## **RHA response to questions** (as per the online survey)

**Q 1 and 2 are introductory questions.**

### **Q 3. On what basis should the Council consider exemptions for Specialist Vehicles (HGVs)?**

Please select only the criteria that you think should apply (Survey list was “Cost to replace with Euro VI, Time driven on the road within the CAZ, Vehicle type / nature of operation, None of the above, Other (please specify):”

A. All of the factors identified have relevance when considering exemptions from CAZ penalties.

Some lorries of a specialist nature are punishingly expensive to replace. Margins are low in many sectors, and there are variable life cycles to consider too. So, the cost of replacement is a critical factor.

The time driven in the zone is also important – that relates directly to the vehicle type and the nature of the operations undertake. A lorry may be in the zone for a long period of time but drive very modest distances. Two examples spring to mind – household removal lorries and breakdown lorries, both can spend considerable time in a zone undertaking tasks other than driving. Making high charges for such activity when negligible mileage is involved and the activity requires presence in the zone makes no real sense from any environmental perspective.

There are also issues related to the people who commission the lorry in the first place. Heavy restrictions on vehicle choice imposed by CAZ charges means that there are few specialist vehicles to use in some cases without paying fines. A perfect example is a bus recovery breakdown vehicle – if a breakdown vehicle compliant with the zone is unavailable it will result in longer disruption while a compliant vehicle is sourced - it will be slower to remove the broken down bus.

It is of critical important to understand what contribution to emissions a given lorry activity makes in the zone and under what circumstances. That relates directly to the duties undertaken by the vehicle.

We feel it is simply silly to charge for some activities such as emergency services or gritting roads in winter.

It is also relevant to consider the Euro class of the vehicles in decision making. It may make sense to exempt a wide range of vehicle operations by using an earlier Euro standard rather than a blanket exemption. This may reassure policy makers that air quality is still a key objective. (For example, Euro IV and V breakdown vehicles could be exempted given the high cost of replacement, the insignificant mileage undertaken in the zone, and the benefits to air quality of the quicker removal of broken-down vehicles)

**Q 4. If you have chosen the option "Cost to Replace with Euro VI" please indicate the minimum threshold you think the Council should set:** (Survey list £200k to £230k, or £230k to £280k, or £280k to £350k, or £350k +)

A. The question is understandable, but to some extent is a red herring.

Identifying vehicles to exempt solely on the basis of replacement cost is inappropriate. What is appropriate is to look at the specialist vehicle types and to determine what activities to exempt from CAZ fines and on what basis. Some exemptions will be because of ultra-high replacement costs as per the suggested amount, but many will cost less than the suggested amount to replace and should still be exempted due to low use and disproportionate impact for the operators concerned or their customers. If there was an option "Other" on the survey we would have selected that.

**3. If you have selected "Time driven on the road" please indicate the threshold you think the council should accept:** (Survey choices were: Less than one hour per business day, Up to two hours per business day, Up to three hours per business day)

A. Time driven on the road in the zone is the more reasonable factor to consider rather than just all time "on the road". It would be appropriate to exempt all lorries that spend less than

an hour driving in the zone, however it is suspected that your intention is to limit this consideration to specialist vehicles.

Considering how long a lorry is driven in the zone over a period is reasonable when deciding what activities to exempt (like gritter lorries, it may be worth thinking of the whole vehicle activity not just in a day). Those vehicles that do predictable high mileage and active all day in the zone should not be selected for exemption, they are the very vehicles that need to be operated to the highest standards if you want to achieve the best air quality outcome.

**Q 6. If you have selected “Vehicle type/nature of operation ” please specify what type(s) you think should qualify as a Specialist Vehicle?** (The survey gives a list of lorries and activities for N2 and N3 lorry sizes.)

A. The following lorries and activities should be exempted. In all cases the vehicles we have selected do a limited mileage and/or undertake specialist work and/or are expensive to replace. We make no distinction between N2 and N3.

BREAKDOWN TRUCK, CESSPOOL EMPTIER, CONCRETE MIXER, FIRE ENGINE (include all emergency service and civil defence vehicles), GLASS CARRIER, GRITTING MACHINE, LINE PAINTER, LOW LOADER (includes some but not all abnormal loads – see notes below), MOBILE PLANT, MOBILE PUMP, ROAD STRIPPER, ROAD SURFACER, SNOW PLOUGH, TANKER, TAR SPRAYER, TELESCOPIC MATERIAL HANDLER, TIPPER, TOWER WAGON, and VINER/PICKER.

There are two types of concrete mixer – drum mixers and volumetric concrete mixers (that can be defined as mobile plant). For reasons of fair competition both should be exempt.

Some survey definitions are vague – we are unsure exactly what is meant. This includes SPECIAL MOBILE UNIT and SPECIAL PURPOSE.

We also note that the movement of abnormal loads is not properly considered. There is a very strong case to say that the movement these vehicles should be exempted from charges. A useful definition in this regard would be to exempt all vehicles that fall within “The Road Vehicles (Authorisation of Special Types (General) Order 2003” including all vehicles involved in the movement of Abnormal Indivisible Loads. These should be exempt of charges when having to enter the Leeds Clean Air Zone.

**Q 7. No comment**



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## **Recommendations**

The RHA recognises the need to improve air quality quickly. Exempting a range of specialist vehicles, the ones that have the longest life span, are most expensive to replace and travel limited mileage (and therefore contribute little to poor air quality) makes sense. In fact it makes no sense at all to expect these vehicles to pay when other vehicle types contribute far, far more to pollution and congestion.

We hope the Council considers the widest possible exemptions. The council may also wish to consider out or hours exemptions for all lorries between 19:00 and 07:00 every day.

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