



Response of the Road Haulage Association to Transport for London.

“Consultation on Mayor’s Transport Strategy”.

2 October 2017

Background about the RHA

1. The Road Transport Industry is a dynamic, business critical sector upon which the UK economy depends. The Road Haulage Association (RHA) is the UK trade association dedicated to the needs of UK road transport operators. It is the voice of the road haulage profession, a champion of its interests and a respected partner to the broader logistics community.
2. We represent approximately 7,000 member companies who commercially operate near to 100,000 lorries nationally and internationally. Companies range in size from those working with a single truck to those with thousands of vehicles.
3. Largely taken for granted, these companies provide an essential service on which the people and businesses of the UK depend. The food we eat, the clothes we wear, the houses we live in, and the places where we work all depend upon road haulage working to get goods to where they need to be.
4. We would like to thank the Mayor for the opportunity to comment on his draft transport strategy. The Road Haulage Association submitted the following answers to the questions posed by the consultation in the online survey.

General Comments

5. The RHA and its members are active supporters of health, safety and welfare in the Road Haulage Sector. We believe that the road network must work for pedestrians and be fit for purpose for all road users - including cyclists, motor cyclists, cars, vans as well as the freight traffic that provides the lifeblood for consumers and commerce.
6. We are keen on exploring alternative traffic management systems for our member’s vehicles and see the London road network as key to enabling the sector to be able to operate efficiently and productively.
7. We will continue to work with authorities in London to promote safer roads for the benefit of all road users and pedestrians.

8. We believe the Mayors Transport Strategy needs to better take into account the requirements of the road freight sector and its customers than is the case in the current draft. Failing to accommodate freight will undermine road safety and add unnecessary costs that will have to be met by the people and businesses of London.
9. The competitiveness and productivity of London depends on having a road system that supplies efficient and predictable movement of goods (and people). To minimise the environmental costs associated with the transporting of goods it is essential that road haulage operators are able to use the most productive and efficient vehicles for the goods to be moved.
10. The Road Haulage Association would like to make several general observations regarding the draft Transport Strategy.
 - The Draft Strategy does not sufficiently consider the need to move goods in efficient, productive and predictable ways,
 - There is insufficient attention paid to the needs for curb space to allow goods to be collected efficiently and in ways that minimise the impacts on other road users,
 - The Draft Strategy does not ensure that the carriageway widths in London are able to meet the needs of freight vehicles (especially at and near junctions),
 - The Draft Strategy does not consider the needs of the vehicle drivers – commercial lorry drivers work in a stressful and difficult environment and they are required to take statutory rest breaks that require parking facilities,
 - There is no attention paid to human behaviour issues and how these impact on modal choice and safety issues,
 - The Draft Strategy fails to look outside London – the impacts of what the Mayor is proposing will extend nationally and internationally,
 - The Draft appears to be trying to drive motorised mobility off the roads through a combination of new taxation, regulation and the increase of congestion through road space reallocation.
11. The Road Haulage Association recommends that the Mayor's strategy needs to;
 - Recognise that sufficient road space is needed to accommodate freight movements,
 - Recognise that large goods vehicles are getting cleaner (as new vehicles replace old ones) without additional regulatory intervention - measures to phase out Euro V vehicles earlier are not appropriate,
 - Recognise that new in-vehicle technological provides an opportunity to support road safety. (Forcing the scrapping of tens of thousands of lorries through Direct Vision Standards (including bans on Euro VI lorries) will result in massive costs for the people and businesses of London and the whole UK,

- Recognise the impacts on businesses that work both in London and elsewhere.

Responses to the Questions

Section 1. – THE CHALLENGE

Question 1. *London faces a number of growing challenges to the sustainability of its transport system. To re-examine the way people move about the city in the context of these challenges, it is important that they have been correctly identified.*

Please provide your views on the challenges outlined in the strategy, and describe any others you think should be considered.

RHA Comments;

For London to continue its position of being one of the most entrepreneurial, international and outward-looking cities in the world there will be a continued need for free flowing traffic with minimised congestion. The road haulage sector will be required to grow to accommodate the additional trips required each day by 2041. Road freight transport will be key to unlocking the potential of London and its growing population, modal shift if it happens at all will not make a substantial reduction in the amount of road freight transport required. The Mayor needs to consider that;

- London is a challenging environment for heavy goods vehicles and road haulage operations.
- Congestion results in long and unreliable transit times in the city.
- Parking to get access to businesses is often inadequate to meet the needs of people and businesses and results in many fines adding to the overall cost of haulage.
- The London Lorry Control Scheme restricts economic movements of large goods vehicles – they are subject to close control on routing (which are often uneconomic) before 07.00 and after 21.00 during the week. (Restrictions apply from Saturday at 13.00 through to Monday morning).
- Lane widths can be narrow for large vehicles to negotiate.
- London has high levels of demand for freight to service the needs of people and businesses.
- Food, construction, other retail, servicing offices, fuel and waste handling are all sectors dependent upon road haulage in London.
- With the suggested increase in population expected over the next 25 years then the need for more and efficient services will be required, this needs to be included in any planning for future traffic routing

Section 2. – THE VISION

Question 2. *The Mayor’s vision is to create a future London that is not only home to more people, but is a better place for all of those people to live and work in. The aim is that, by 2041, 80% of Londoners’ trips will be made on foot, by cycle or using public transport.*

To what extent do you support or oppose this proposed vision and its central aim?

RHA Response - Neither agree or disagree

Question 3. *To support this vision, the strategy proposes to pursue the following further aims:*

To what extent do you agree or disagree with the aims set out in this chapter?

- *By 2041, for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day.*
- *For no one to be killed in, or by, a London bus by 2030, and for deaths and serious injuries from all road collisions to be eliminated from our streets by 2041.*
- *For all buses to be zero emission by 2037, for all new road vehicles driven in London to be zero emission by 2040, and for London’s entire transport system to be zero emission by 2050.*

RHA Response - Neither agree or disagree

- *By 2041, to reduce traffic volumes by about 6 million vehicle kilometres per day, including reductions in freight traffic at peak times, to help keep streets operating efficiently for essential business and the public*

RHA Response - Strongly disagree

- *To open Crossrail 2 by 2033*
- *To create a London suburban metro by the late 2020s, with suburban rail services being devolved to the Mayor*



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- *To improve the overall accessibility of the transport system including, by 2041, halving the average additional time taken to make a public transport journey on the step-free network compared to the full network*
- *To apply the principles of good growth*

RHA Response - Neither agree or disagree

RHA Comment on Section 2;

The purpose of roads is to move the all traffic that is needed for businesses and people. Given the growth in London and the increased demand that this will create for freight, the target and aims look unrealistic. There are opportunities to spread freight movements so peak time traffic is moderated, but that will require changes to the London Lorry Control Scheme to allow goods vehicles to move freely earlier and later than is now permitted..

We agree that there can be benefits in reducing car dependency and increasing active and sustainable travel, however this cannot be at the detriment of the infrastructure that allows the logistics sector to feed, house and resupply the increase in population of 2.2 million people, the servicing of the 1. 2 million new jobs and the construction of the more than 1 million new homes the city needs by 2041.

Any reduction in congestion would be welcome. The road network, including the provision of parking, needs meet the needs of pedestrians and all road users - including cyclists, motor cyclists, car drivers, van drivers and large freight vehicle users.

The move to cleaner vehicles is happening as older vehicles are naturally replaced by cleaner ones. It is vital that changes to the fleet are not forced inappropriately by London regulation in such a way that the change will unnecessarily undermine the competitiveness and productivity of the city.

Especially for operators of small lorry fleets (and single owner – operators) measures requiring them to upgrade their vehicle early will impose a significant financial impact upon them. This will lead to an increase in prices of the goods they carry. TfL'S own information estimates that for HGV operators within the construction sector, around half of the new costs would be absorbed by businesses, this is probably true in the short-term but in the long-term we have doubts that the sector will absorb all the costs suggested. This industry market is competitive, passing on short-term cost increases may be not be feasible for some of the many small businesses operating in the area, and may lead to some firms exiting the market.

Section 3. – HEALTHY STREETS AND HEALTHY PEOPLE

Question 4. *Policy 1 and proposals 1-8 set out the Mayor’s draft plans for improving walking and cycling environments (see pages 46 to 58).*

To what extent do you agree or disagree that these plans would achieve an improved environment for walking and cycling?

RHA Response - Neither agree or disagree

Comments on Question 4.

The proposals may improve the environment for the selected groups. But roads need to still function as the providers of mobility for motorised traffic. London need the goods that are moved by road. We believe that taking capacity away from the primary function of the roads (motorised vehicles) through the re-allocation of road space will increase congestion. The proposals fail to take account of the needs of motorised vehicles and are unbalanced.

We also point out that causing increased congestion will have serious stress and health implications for road users, but in particular for drivers who have no choice such as lorry drivers. A further contribution to stress levels will be the proposed narrowing of road carriageways - this can make them less safe and will add to stress of all road users, but particularly for drivers of large vehicles.

Question 5. *Policy 2 and proposals 9-11 set out the Mayor’s draft plans to reduce road danger and improve personal safety and security (see pages 62 to 67).*

To what extent do you agree or disagree that these plans would reduce road danger and improve personal safety and security?

RHA Response - Neither agree or disagree

RHA Comments on Question 5.

Direct Vision Standards proposals have so far failed to take account of the causation of collisions, the approach to date has been very simplistic. Any standard needs to take account of all relevant factors that cause road danger so that the causes can be addressed in the most effective way – including the adoption of new technology, driver training and the consideration of behavioural factors.

Question 6. *Policy 3 and proposals 12-14 set out the Mayor's draft plans to ensure that crime and the fear of crime remain low on London's streets and transport system (see pages 68 to 69).*

To what extent do you agree or disagree that these plans would ensure that crime and the fear of crime remain low on London's streets and transport system?

RHA Response - Neither agree or disagree

Question 7. *Policy 4 and proposals 15-17 set out the Mayor's draft plans to prioritise space-efficient modes of transport to tackle congestion and improve the efficiency of streets for essential traffic, including freight (see pages 70 to 78).*

To what extent do you agree or disagree that these plans would tackle congestion and improve the efficiency of streets?

RHA Response - Strongly disagree

RHA Comments on Question 7.

Consolidation centres are unproven as effective on a widespread basis. Proposal 15 lacks credibility without sufficient funding from TfL. The proposal to ban personal deliveries at work places may be counter-productive by inducing less efficient delivery models.

Developing "London Lorry Standards" will make the regulatory environment much more complex for the sector. Lorry standards are best set at international level – this allows operators to make investments in the best new vehicles over the longer term. The Mayors ongoing input at national and international levels in relation to vehicle standards is welcome.

Modal shift to rail for freight in London that will substitute for road freight journeys is not credible, sites for new rail freight interchanges in London do not exist and final deliveries would still have to be done by road.

Question 8. *Proposals 18 and 19 set out the Mayor's proposed approach to road user charging (see pages 81 to 83).*

To what extent do you agree or disagree with the proposed approach to road user charging?

RHA Response - Strongly disagree

RHA Comments on Question 8

Road user charging is a form of price rationing through a new tax. It will hit all users who have to still use the road network in motorised vehicles. All freight will have to pay, and this extra taxation will undermine the competitiveness of the city. To date TfL have not provided information on how much it expects to raise from new charging regimes (ULEZ charges and DVS Permit fees). We would hope any final strategy and the final consultations on changes to ULEZ and Direct Vision Standards will be clear about this.

It is worth noting that the burden of any road user charging scheme usually falls most heavily on the poorest road users (the ones with the oldest vehicles where the cost of using them is a higher proportion of their income) – these users will be the ones who will be priced off the network.

***Question 9.** Proposals 20 and 21 set out the Mayor’s proposed approach to localised traffic reduction strategies (see page 83).*

To what extent do you agree or disagree with this approach?

RHA Response - Strongly disagree

RHA Comments on Question 9.

Local road charging schemes will add complexity to freight operations. It may well encourage diversion to longer routes, with the consequence of adding to air quality, congestion and productivity problems.

***Question 10.** Policies 5 and 6 and proposals 22-40 set out the Mayor’s draft plans to reduce emissions from road and rail transport, and other sources, to help London become a zero carbon city (see pages 86 to 103).*

To what extent do you agree or disagree that these plans would help London become a zero carbon city?

RHA Response - Strongly disagree

RHA comments on Question 10.

The question as posed is a leading one – and it does not deal with the issues raised in all the proposals.

The strategy for air quality needs to take account of the changes that are already happening. It is unclear how much will be raised by ULEZ taxes, given that impacts will be very short term, the costs

may not justify the current planned phasing. The RHA has suggested that changes for newer vehicles should be phased over a longer period than is currently planned – we do note that the application of the proposed expanded ULEZ to only allow Euro VI lorries is subject to further consultation.

The targeting of local air quality hot spots is welcome. It should be noted that congestion is a major contributory factor in poor air quality hot spots.

The move to zero carbon is dependent upon technological change. The Transport Strategy should acknowledge this by keeping interventions under review as new solutions develop nationally and internationally.

Question 11. *Policies 7 and 8 and proposals 41-47 set out the Mayor's draft plans to protect the natural and built environment, to ensure transport resilience to climate change, and to minimise transport-related noise and vibration (see pages 104 to 111).*

To what extent do you agree or disagree that these plans would achieve this?

RHA Response - Partially agree

RHA comments on Question 11.

The RHA welcomes the opportunity to continue to work on noise issues. Much can be gained through training and best practice initiatives.

Section 4. – A GOOD PUBLIC TRANSPORT EXPERIENCE

Questions 12 to 17.

RHA Response - Neither agree or disagree

Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.

RHA comments on Section 4. (questions 12 to 17)

We have nothing significant to add to the draft Transport Strategy on section 4 other than any improvements made to the Public Transport Experience should not be to the detriment of the commercial road freight sector who will have an increasing demand on their services.

Kerb side parking restrictions already burden operators and if there is a possible shift to more availability of kerb side parking for loading unloading then we would welcome any discussion or improvement.

Section 5. – NEW HOMES AND JOBS

Question 18, 19 and 20.

RHA Response - Neither agree or disagree

RHA Comments on Section 5. (Questions 18 to 20)

Section 5 of the draft Mayors Transport Strategy states that land will be required to build 50,000 new homes per annum until 2041, along with the numerous major construction plans and redevelopment of TFL owned land. This alone will generate hundreds of thousands of heavy vehicle movements.

Rail and tube stations as places to build high density mixed use places is fine for walking, cycling and public transport but these stations tend to be in extremely built up areas that resupply vehicles struggle to access and park to load or unload –provision needs to be made for this.

We welcome the planning process idea of ensuring delivery and servicing plans, the opportunity to be able to deliver in off peak times is of great benefit to everyone – a real win – win opportunity exists if wider delivery and collection windows can be facilitated. What we should always ensure is that the sector has time to adapt to the requirements and not penalise operators who are unable to meet short deadlines to upgrade equipment.

The consolidation centre strategy is one we have concerns about as this approach has not successfully been implemented on a wide area basis in a large area like London. Access to and from consolidation centres will need to be congestion free, and proper facilities for visiting service vehicle drivers will be essential. The cost for the Mayor and Transport for London could be very high, the cost to the productivity and competitiveness of London could be also be high.

We welcome the idea of Opportunity Areas as these will reduce the need for multiple deliveries, as long as access to parking and facilities for visiting service vehicle drivers is also planned.

Section 6. – DELIVERING THE VISION

Question 21. Policy 21 and proposals 97 to 101 set out the Mayor’s proposed approach to responding to changing technology, including new transport services, such as connected and autonomous vehicles (see pages 256 to 262).

To what extent do you agree or disagree with this proposed approach?

RHA Response - Neither agree or disagree

Question 22. *Policy 22 and proposal 102 set out the Mayor's proposed approach to ensuring that London's transport system is adequately and fairly funded to deliver the aims of the strategy (see pages 265 to 269).*

To what extent do you agree or disagree with this proposed approach?

RHA Response - Strongly disagree

Question 23. *Policies 23 and 24 and proposal 103 set out the proposed approach the boroughs will take to deliver the strategy locally, and the Mayor's approach to monitoring and reporting the outcomes of the strategy (see pages 275 to 283).*

To what extent do you agree or disagree with this proposed approach?

RHA Response - Strongly disagree

RHA Comments on Section 6 (questions 21 to 23);

The haulage sector is subject to widespread and changeable requirements based on legislative and other non-legislative regulation. It is a heavily regulated sector – as is right given the responsibility placed upon it.

It is already having to pay higher taxation on fuel than in any other European country. The sector will be dealing with increased costs due to the Mayors plan for new lorry direct vision standards, and the fleet upgrades required for the ULEZ for London. On top of this will be new requirements from other air quality plans across the UK.

It is the responsibility of all regulators to be aware of the impacts on those regulated, not only from their own individual actions, but also by being aware of the wider regulatory environment. The breakdown of single cohesive regulation on a nation and international basis will be very costly for the road haulage sector and ultimately to consumers and businesses.

The move to bring forward the ULEZ is unwelcome and has a direct impact on all who live within London and the boroughs as excessive costs will pass back to the consumer. Haulage operators have accepted the need for change and had planned for the introduction of the ULEZ in late 2020, bringing this forward to 2019 for all non Euro VI lorries is seen by many as a means to start paying for the increased spending requirements of the Mayor.



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We hope that further devolved borough accounting will not see further charges made in the boroughs to freight movements – to do so will further break down the cohesive environment that goods vehicle operators have to work in.

24). Are there any other comments you would like to make on the draft Mayor's Transport Strategy?

Comments relating to this question are in the "General Comments" section at the beginning of this document.

25). We have commissioned an Integrated Impact Assessment (IIA) on the draft Mayor's Transport Strategy. The IIA evaluates the social, economic, environmental, health, community safety and equality consequences of the MTS's proposed policies in order to ensure they are fully considered and addressed. The IIA has assessed the draft MTS as a whole; detailed assessment of specific schemes will be undertaken at a more appropriate level, such as assessment of Local Implementation Plans (LIPs) or at planning consent stage (where applicable).

RHA Comments

We welcome that more detailed impact assessments will be done on individual measures. This IIA, with 400 pages or so of detail, does not engage meaningfully with stakeholders because it falls between the detail of a scheme IIA and the generalities of a long term strategy. It is unwieldy.

We would welcome your views on the impacts that have been identified and whether you feel anything is missing?

The detail needs to be thoroughly assessed for the individual measures. Working with the Mayor and TfL on the detail for individual measures will be a priority for the Road Haulage Association.

Comments relating to the impacts on some of the core measures have been made elsewhere in this response to the consultation.