



Response of the Road Haulage Association to the DfT

“Regulatory changes to support the take-up of alternatively-fuelled light commercial vehicles”

13/10/2017

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 Transport, 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 Questions

Q1: Can you explain and quantify any benefits (e.g. economic, environmental) that the proposed policy would bring?

A: Vans have been proliferating the Road Haulage sector for many years now a move away from Diesel and Petrol will benefit Air Quality.

Allowing the payload to be maintained for alternative fuelled vehicles will ensure congestion will not increase.

Q2: Can you explain and quantify any disadvantages (e.g. economic, environmental) that the proposed policy would bring?

A: Congestion is one of the biggest causes of emissions we will see an opposite effect and an increase in emissions if more vans are allowed on the roads due to this derogation.

Should the derogation be allowed then it is important that no one Van manufacturer or Operator is allowed an unfair advantage in GVW and a common payload should be adopted.

Q3: What are your views on the safety implications of the proposed policy, including drivers of alternatively-fuelled vehicles at 4,250kg no longer being within the scope for taking the Driver Certificate of Professional Competence (DCPC)?

A: The driver CPC has increased the knowledge base of all those drivers who have to undertake it; we have seen an increase in skills due to the requirement for DCPC. If any vehicle is carrying goods for a commercial purpose then the drivers should receive relevant training, rather than allow them a derogation to not be trained, the DfT should review whether all van drivers should undertake DCPC. Currently drivers of commercial vehicles who have to complete DCPC in most cases undertake training in driver's hours rules, the importance of not over loading and load security of the vehicle, the implications of vulnerable road users etc. These drivers although driving smaller vehicles still need to know this information.

Q4: What are your views (e.g. economic, environmental, safety) on vehicles meeting the proposed derogation being excluded from towing a trailer (of any weight or size)?

A: We agree on this point

Q5: What percentage of operators do you estimate will take advantage of the extra weight allowances for vehicles with alternative fuel technologies?

A: No Comment

Q6: If we proceed with removing the general exemption from operator licensing for electric vehicles, should we exempt alternatively-fuelled goods vehicles with a gross vehicle weight not exceeding 4,250kg and used for own-account haulage? If not, please provide details. Supporting evidence is welcomed.

A: As previously stated there must be a level playing field for all operations with no one having an unfair advantage over others.

Q7: Do you envisage any difficulties with the proposed approach to the MOT testing of electrically-powered vans? If so, please provide details.

A: No

Comments and general observations:

5. The RHA believe that all Vans should be annually MOT Tested from new.



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6. We further believe that Van operators should have a controller with industry knowledge in the operation.
7. All van drivers (including those allowed under this derogation) should carry out driver CPC training.

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