



## **Response of the Road Haulage Association to National Infrastructure Commission.**

### **“Congestion, Capacity, Carbon: Priorities for national infrastructure”.**

**10<sup>th</sup> January 2018**

#### **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 National Infrastructure Commission for the consultation and the opportunity to comment on the issues raised.

#### **Responses to the Questions**

**Question 1. How does the UK maximise the opportunities for its infrastructure, and mitigate the risks, from Brexit?**

4. Freight is the lifeblood of the UK economy, regardless of mode, it moves 100% of everything! The UK must have a road infrastructure that is fit for purpose for the needs of the 21<sup>st</sup> Century society, not one that was fit for purpose in the 1950's. This requires consistent investment over time to ensure that networks provide sufficient reliable capacity for the distribution of goods. Freight distribution and the competitiveness of the UK economy need this.

**Question 2. How might an expert national infrastructure design panel best add value and support good design in UK infrastructure? What other measures could support these aims?**

5. A design panel might encourage better design for infrastructure so that new infrastructure – in particular, new roads – gains greater public acceptance. There is a lack of joined up thinking between Highways England and local authorities in their approach to infrastructure and other changes, be that road works management and speed, weight limits, congestion charges, bridge & toll charges or closure of layby's, all of which can change behaviour and force traffic onto alternative routes. This can increase costs and journey times for hauliers or create congestions on alternative routes that were previously problem free - unintended consequences occur if decisions are made unilaterally, they need to be co-ordinated.
6. There are also links to planning impacts. Sites that restrict access to rigid vehicles and opening hours increase the hourly volume of traffic. Often we find that night time activity is ruled out as a matter, when (as proven through the Olympics) this can be operated successfully and sensitively, speeding works and reducing congestion through the daytime when there are more cars, cyclists and pedestrians on the networks.
7. Logistics Park and other major site developments need incorporate proper break and overnight parking facilities for Heavy Goods Vehicles servicing these premises. There is a current deficit of 3500 overnight parking spaces in England and Wales – we need to design and plan lorry parking when large sites are developed.

**Question 3. How can the set of proposed metrics for infrastructure performance (set out in Annex A) be improved?**

8. Ensure accountability for system performance is clear to all parties.

**Question 4. Cost-benefit analysis too often focuses on producing too much detail about too few alternatives. What sort of tools would best ensure the full range of options are identified to inform the selection of future projects?**

9. Properly done, cost benefit analysis should assess the full range of options. Early public pre-consultation to describe the problem to be addressed will help in some cases.

**Question 5. What changes are needed to the regulatory framework or role of Government to ensure the UK invests for the long-term in globally competitive digital infrastructure?**

10. No comment

**Question 6. What are the implications for digital infrastructure of increasing fixed and mobile convergence? What are the relative merits of adding more fibre incrementally over time compared to pursuing a comprehensive fibre to the premises strategy?**

11. No comment

**Question 7. What are the key factors including planning, coordination and funding, which would encourage the commercial deployment of ubiquitous connectivity (including, but not only, in rural areas)? How can Government, Ofcom and the industry ensure this keeps pace with an increasingly digital society?**

12. No comment

**Question 8. How can the risks of 'system accidents' be mitigated when deploying smart infrastructure?**

13. No comment

**Question 9. What strategic plans for transport, housing and the urban environment are needed? How can they be developed to reflect the specific needs of different city regions?**

14. Safe, low carbon, motorised transport needs priority road investment as our modern society depend on road freight. Road freight also needs infrastructure investment in fit for purpose parking facilities to allow proper driver rest - so that they can work safely. Roads need to be congestion free, with reliable journey times. Much of the UK road network needs upgrading both on and off the Strategic Road Network, failure to provide capacity is undermining the competitiveness of the UK economy.



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15. Proposals can be developed for all cities and regions based on reducing congestion for road freight vehicles.

**Question 10. What sort of funding arrangements are needed for city transport and how far should they be focused on the areas with the greatest pressures from growth?**

16. The new funding for major roads is key, see the recent Department for Transport, “Proposals for the Creation of a Major Road Network Consultation”. Seeing how this funding arrangement is implemented will be vital to ensure an improved network is available for freight. It is important that and funding is not at the detriment of the Road Haulage sector by charging more to use the roads or enter cities. In urban areas there are no significant modal alternatives to road freight so it is vital that priority is given to ensuring road capacity for freight is maintained and grown.

**Question 11. How can the Section 106 and Community Infrastructure Levy regimes be improved to capture land and property value uplift efficiently and help fund infrastructure? Under what conditions are new mechanisms needed?**

17. Infrastructure must include proper lorry parking areas, including lay-bys, for driver breaks and overnight parking. Overnight facilities need to be safe, secure, on level hard standings, well lit and with properly serviced toilets, showers, food and recreational facilities. No mention has been made of S.278 Highways Act 1980 which gives better and appropriate funding streams for works. For example, a highway authority may, if they are satisfied it will be of benefit to the public, enter into an agreement with any person—
- (a) for the execution by the authority of any works which the authority are or may be authorised to execute, or
  - (b) for the execution by the authority of such works incorporating particular modifications, additions or features, or at a particular time or in a particular manner, on terms that that person pays the whole or such part of the cost of the works as may be specified in or determined in accordance with the agreement.

**Question 12 What mechanisms are needed to deliver infrastructure on time to facilitate the provision of good quality new housing?**

18. No comment.

**Question 13. What will the critical decision factors be for determining the future of the gas grid? What should the process for deciding its future role be and when do decisions need to be made?**

19. No comment.

**Question 14. What should be the ambition and timeline for greater energy efficiency in buildings? What combination of funding, incentives and regulation will be most effective for delivering this ambition?**

20. No comment

**Question 15. How could existing mechanisms to ensure low carbon electricity is delivered at the lowest cost be improved through:**

**Being technology neutral as far as possible**

**Avoiding the costs of being locked in to excessively long contracts**

**Treating smaller and larger generators equally**

**Participants paying the costs they impose on the system**

**Bringing forward the highest value smart grid solutions.**

21. No comment.

**Question 16. What are the critical decision factors for determining the role of new nuclear plants in the UK in scenarios where electricity either does, or does not, play a major role in the decarbonisation of heat? What would be the most cost effective way to bring forward new generation capacity? How important would it be for cost-effectiveness to have a fleet of nuclear plants?**

22. No Comment.

**Question 17. What are the critical decision factors for determining the role of carbon capture and storage in the UK in scenarios where electricity either does, or does not, play a major role in the decarbonisation of heat? What would be the most cost-effective way to bring it forward?**

23. No comment

**Question 18. How should the residual waste stream be separated and sorted amongst anaerobic digestion, energy from waste facilities and alternatives to maximise the benefits to society and minimise the environmental costs?**

24. No comment.

**Question 19. Could the packaging regulations be reformed to sharpen the incentives on producers to reduce packaging, without placing disproportionate costs on businesses or creating significant market distortions?**

25. No comment.

**Question 20. What changes to the design and use of the road would be needed to maximise the opportunities from connected and autonomous vehicles on:**

**Motorways and 'A' roads outside of cities?**

**Roads in the urban environment?**

**How should it be established which changes are socially acceptable and how could they be brought about?**

26. Technology needs to be safe and wireless. Conventional vehicles will exist for many years to come, so the transition needs to be progressive, gradual and able to rapidly adapt to new developments, which do not currently exist.

**Question 21.**

**a) What Government policies are needed to support the take-up of electric vehicles?**

**b) What is the role of Government in ensuring a rapid rollout of charging infrastructure?**

**c) What is the most cost-effective way of ensuring the electricity distribution network can cope?**

27. a) In the freight sector supporting the take up of electric vehicles is dependent on the development of technology. In the current circumstances we would recommend no new policies until technology options for HGV's becomes clear.

28. b) The question assumes that new charging infrastructure will be needed. What must be assessed first is the justification for new charging models. Any new charging system must be better than the system they replace.

29. c) No comment

**Question 22. How can the Government best replace fuel duty? How can any new system be designed in a way that is fair?**

30. The Government could introduce distance based taxation for all vehicles. Introduction for goods vehicles alone, as is currently being investigated, will not replace losses in fuel duty revenue. It should be noted that a decline in fuel duty from lorries will not happen as there is no non fossil fuel alternative at this time. Any shift to distance based road taxation must be revenue neutral for the freight sector.

**Question 23. What should be done to reduce the demand for water and how quickly can this have effect?**

31. No comment

**Question 24. What are the key factors that should be considered in taking decisions on new water supply infrastructure?**

32. No comment



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**Question 25. How can long-term plans for drainage and sewerage be put in place and what other priorities should be considered?**

33. No comment

**Question 26. What investment is needed to manage flood risk effectively over the next 10 to 30 years?**

34. No view.

**Question 27. What would be the most effective institutional means to fulfil the different functions currently undertaken by the European Investment Bank if the UK loses access? Is a new institution needed? Or could an expansion of existing programmes achieve the same objectives?**

35. No comment

**Question 28. How could a comprehensive analysis of the costs and benefits of private and public financing models for publicly funded infrastructure be undertaken? Where might there be new opportunities for privately financed models to improve delivery?**

36. No comment

10<sup>th</sup> January 2018

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