



The Road Haulage Association

Response of the Road Haulage Association to the Scottish Government.

“Building Scotland’s Low Emission Zones”.

24/11/2017

Background about the RHA

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.

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.

We would like to thank The Scottish Government for the consultation and the opportunity to comment on the issues raised.

Responses to the Questions

**Question 1. Do you support the principle of LEZs to help improve Scottish air quality?
Please be as specific as possible in your reasoning.**

The RHA believes that the sole principal of LEZs should be to help improve Scottish air quality and these must focus on areas of greatest risk to public health. Research in London & Glasgow show that these areas are often clearly defined areas where buses and taxis are subjected to high levels of congestion.

Question 2. Do you agree that the primary objective of LEZs should be to support the achievement of Scottish Air Quality Objectives? If not, why not?

Yes. LEZs should be used to support the achievement of Scottish Air Quality Objectives however they must be used in tandem with other measures and focus on areas with the poorest air quality.

Question 3a. Do you agree with the proposed minimum mandatory Euro emission criteria for Scottish LEZs?

No. The RHA does not agree with the proposed Euro emission criteria for Scottish LEZs. By early 2019 it is expected that 52% of Great Britain's HGV fleet will meet Euro VI emission standards. To set Euro VI emission standard from the outset would be unrealistic for many haulage operators in the UK. The RHA would far rather see a phased, more considered approach to allow time for companies to upgrade their fleets and reach Euro VI standard. For example, a suggested starting point for any phasing could be to start with the minimum standard of Euro IV, then have Euro V as the minimum standard from 2021 & then have Euro VI as the minimum standard from 2024.

Question 3b. Do you agree with the proposal to use the NMF modelling in tandem with the NLEF appraisal to identify the vehicle types for inclusion within a LEZ?

Yes. Modelling plays a vital role in ensuring any LEZ is targeted to achieve reductions to Air Quality in the areas that it is needed most.

Question 3c. Should emission sources from construction machinery and/or large or small van refrigerated units be included in the LEZ scope, and if so should their inclusion be immediate or after a period of time?

These vehicles and pieces of machinery are out with the remit of the RHA and so we have no strong views on their inclusion.

However, we do feel that all sources of pollution should be addressed based on enforceable standards. Any standards applied will also need to take account of the economic life of the equipment used and the intensity of that use. You may find it appropriate to exclude some machinery that is seldom used from scope (e.g. emergency backup generators).

Question 4. What are your views on adopting a national road access restriction scheme for LEZs across different classes of vehicles?

The RHA would prefer the use of a national road access restriction scheme, but this must be accompanied by the phased implementation by euro classes.

Question 5. What are your views on the proposed LEZ hours of operation, in particular whether local authorities should be able to decide on LEZ hours of operation for their own LEZs?

The RHA believes that “out-of-hours” deliveries should be encouraged and have the potential to improve congestion and therefore air quality and ultimately the quality of life. If a phased approach to introducing an LEZ and the varying Euro emission standards is preferred by the Scottish Government, then the RHA would have no preference as to the hours of operation of an LEZ. However, if the hours of operation become a factor a consistent approach must be taken across LA boundaries in Scotland.

Question 6. What are your views on Automatic Number Plate Recognition enforcement of LEZs?

The RHA believes that ANPR enforcement of LEZs offers the most resource effective and accurate method of enforcement.

Question 7a. What exemptions should be applied to allow LEZs to operate robustly? Please be as specific as possible in your reasoning.

The RHA believes that exemptions should be given for certain specialist vehicle activities. For example these could include gritting, snow ploughing, emergency vehicles & recovery vehicles. These are limited activities where vehicle replacement costs are very high and the air quality impact is negligible.

Question 7b. Should exemptions be consistent across all Scottish local authorities?

Yes. The RHA believes that consistency of standards across Local Authorities is crucial to the success of Low Emission Zones.

Question 8. What are your views on LEZ lead-in times and sunset periods for vehicle types shown in Table 2?

The RHA agrees with the principal of sunset periods & lead in times. Both offer business time to adapt business practice, upgrade vehicle fleets and become compliant with LEZ standards with the lowest financial penalty while achieving the greatest air quality improvements at the time of “go-live”.

Question 9. What are your views about retrofitting technology and an Engine Retrofitting Centre to upgrade commercial vehicles to cleaner engines, in order to meet the minimum mandatory Euro emission criteria for Scottish LEZs?

Retrofitting of commercial vehicles is fiercely expensive and actually may not provide the full benefit of the latest technology. Any proposal for retrofit should be fully funded. The cost should not be borne by the business and their customers. With appropriate phasing it is unlikely that retrofit will be an effective option.

Question 10. How can the Scottish Government best target any funding to support LEZ implementation?

Ideally any funding should be focussed on infrastructure improvements to reduce congestion in air quality hot spots and to smooth traffic flow. Any funding given to encourage the uptake of Low Emissions Vehicles within the Road Haulage industry, similar to that provided through the Green Bus Fund would also be warmly received and utilised.

Question 11. What criteria should the Scottish Government use to measure and assess LEZ effectiveness?

The RHA agrees that the existing data monitoring points, stations & those utilised by the NMF are a good method to monitor the effectiveness of an LEZ. However these methods currently only measure tail pipe emissions. The RHA and its members believe it could be more accurate to measure the amount of NOx per tonne carried by HGV, rather than just the HGV itself. Monitoring any reduction in congestion as a result of traffic management measures, as well as an LEZ could also be a contributing factor.

Question 12. What information should the Scottish Government provide to vehicle owners before a LEZ is put in place, during a lead-in time and once LEZ enforcement starts?

It is crucial operators of HGVs are aware of when an LEZ will commence, what times it is operational, geographically where it is operational, what vehicle classes are effected and how they will be penalised financially. It is also critical that all LEZ's work in the same way – with the same operating hours and with the same vehicle standards throughout Scotland.

Question 13. What actions should local or central government consider in tandem with LEZs to address air pollution?

Reducing congestion is critical in improving air quality in city centres. Operating HGVs at slow speeds, in stop start traffic is the least efficient way to do so. Through effective coordination of road works, better vehicle routing & encouraging out of hour's deliveries you can reduce congestion and improve the flow of traffic.

The road haulage industry would like to make better use of out of hour's deliveries which offer economic benefits to hauliers, retailers & residents as well as environmental benefits for all concerned however current city centre restrictions make it very difficult to do so.

We also believe that it would be in the interest of all road users for The Scottish Government to advocate HGV's using bus lanes at all times of the day. This would ease congestion; allow goods to be delivered on time, in the most efficient method possible, keeping the supply chain moving.

Question 14. How can LEZs help to tackle climate change, by reducing CO2 emissions in tandem with air pollution emissions?

This is difficult with the current vehicle technologies in the heavy goods sector. It may be prudent to defer decisions in this area and review in 4 or 5 years when the availability of further options might be clearer.



Question 15. What measures (including LEZs) would make a difference in addressing both road congestion and air pollution emissions at the same time?

Effective coordination of roadworks, better traffic management, vehicle routing and encouraging the use of roads out of peak times, for example by using “priority lanes” for freight movements.

Question 16. Do you have any other comments that you would like to add on the Scottish Government’s proposals for LEZs?

Low Emission Zones offer an effective tool to improve Air Quality in city centres which everyone would like to see achieved. However these must not be implemented to the detriment of industry, particularly the road haulage industry who physically keeps Scotland’s economy moving. Between the introduction of Euro VI in 2014 and the end of 2016, the RHA estimates that the NOx emissions across Great Britain from HGVs have reduced by about a third. This improvement will continue over coming years.

Authorities must not lose sight of 1) the important role the Road Haulage industry plays in our City Centres and 2) the improvements the industry have already made, and will continue to make in order to operate in an efficient and environmentally friendly manner.

A phased implementation of any LEZ is crucial to ensure the competitiveness of the road haulage industry, our economy continues to thrive and Scottish Air Quality targets are met.

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