

Response of the Road Haulage Association to the Greater London Authority consultation.

“The London Plan”.

1st March 2018

Summary

1. The Greater London Authority is consulting on the new London Plan. Under the legislation establishing the Greater London Authority (**GLA**), the Mayor is required to publish a Spatial Development Strategy (**SDS**) and keep it under review.
2. The SDS is known as the London Plan. As the overall strategic plan for London, it sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.
3. This London Plan runs from 2019 to 2041. The date has been chosen to provide a longer-term view of London’s development to inform decision making. However, some of the more detailed elements of the Plan, such as the housing targets are set only for the first ten years of the Plan.
4. The RHA has confined our response to Road Haulage aspects.

Background about the RHA

5. 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 and London depend.
6. 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.
7. We would like to thank the Greater London Authority for the consultation and the opportunity to comment on the issues raised.

General Comments

8. The RHA is disappointed about the lack of meaningful consideration that has been given to freight. The tone regarding freight throughout is negative, focusing



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on the perceived problems for others in respect of freight, it totally fails to consider the legitimate and essential needs of freight operators and their customers.

9. Efficiency will improve when traffic congestion is reduced.
10. The safety of all road users is paramount. Drivers of Heavy Goods Vehicles are the most highly trained drivers, after emergency service vehicles. HGV drivers undergo periodic medicals and have legislated rest periods which are overseen by Driver Vehicle Standards Agency and regulated by Traffic Commissioners.
11. The London Plan and Integrated Impact Assessment appears to have made an assumption that pollution levels will be exacerbated due to the increased demand for road freight. This assumption appears to be incorrectly based on operating pre Euro VI engine HGV's, which have been replaced progressively since 2014.
12. This road haulage sector supplies London with almost everything Londoners consume, without this supply chain, there would be no food, medicines or other consumables for the welfare and wellbeing of Londoners.
13. It is unrealistic to think that substantial quantities of construction materials, furniture, white goods, food and other bulky and heavy goods can be delivered to site efficiently by any other vehicle than a heavy goods vehicle.
14. Authorities need to realise it would take twenty or more transit sized vans to carry the load of a 44 tonne articulated vehicle. Van are not subject to drivers hours regulations, or other safety related legislation and will increase congestion. Anti-lorry measure and restrictions will add to congestion instead of creating traffic free flow.
15. No mention is made about lorry parking facilities, driver rest, or toilet facilities, where drivers take their mandatory break, daily and weekly rest periods. Special Types Goods Order load movements also need to move large infrastructure loads throughout London, there is no mention of how these load movements will be accommodated. There is an identified national shortage of lorry parking facilities and this vital part of the infrastructure has not been mentioned, or even considered. There is no mention of alternative fuel supplies, or charging facilities for electric commercial vehicles. Infrastructure of this type could be funded by S.106 planning agreements.
16. Chapter 6 Economy - The RHA welcomes Policy E4 Land for industry, logistics and services to support London's economic function. A sufficient supply of land and

premises in different parts of London to meet current and future demands for industrial and related functions should be maintained.

17. Chapter 10 Transport - Table 10.1 provided indicative list of over 30 transport schemes. Road freight by HGV's forms part of 5 of these schemes;
- i. Freight consolidation programme (Medium Cost);
 - ii. Freight fleet emissions reductions (Low Cost);
 - iii. Road Pricing; next generation charging (Medium/High Cost);
 - iv. ULEZ London-wide for buses, coaches and HGVs (Low Cost);
 - v. Vision Zero (safer road user behaviours through education, engagement and enforcement, and improved vehicle safety including banning most dangerous HGVs/HGV Direct Vision) (Low Cost).

These may be low cost to implement from a London Authorities perspective, but will create a massive cost for the haulage sector and the London economy. Costs for business will come from compliance with London regulatory requirements and operators purchasing articulated and ridged vehicles to comply with new standards (Direct Vision Standards may cost billions).

18. The operating life of a Heavy Goods Vehicle is about twelve years. Any changes to vehicle specifications must be carefully thought out and planned to take into account the twelve year HGV life cycle.
19. Low emission vehicles do not solve traffic congestion problems, free flowing traffic does.
20. At 10.7.1 the plan seeks to promote “consolidation, modal shift and deliveries at different times of the day and night”. The RHA believes that just one of those 3 policies will have a meaningful impact on freight movements, that is delivery at different time.
21. At 10.7.2 reference is made to lorries and vans operating “at congested times of the day”. For lorries part of the reason for this is that draconian, bureaucratic and out of date LLCS restrictions from the 1980's are in place that limits the economic use of lorries on the road network before 07:00 every day and at weekends. The haulage industry has worked on re-timing deliveries with some success. But this is hampered by the inappropriate limitations imposed on freight movements. It is the policies within London that prevent this now.
22. 10.7.2 also inappropriately mixes up the operations of vans and lorries. This shows a fundamental ignorance about how logistics and supply chains work. The attack on the sector for freight vehicles being “less half full” also demonstrates a lack of understanding – we do not suggest that trains have to be full all the time or in both directions. We do not expect every car to have 5 occupants all the

time either, or buses to be full on every journey. Freight vehicles cannot be full at all times, waste collection vehicles start empty and fill up and fuel tankers start full and finish empty. It should be recognised that for a freight operator, the objective is to meet the customers needs in the best way possible (safely and cost effectively)

23. The promotion of consolidation and distribution centres at the edge of London may have some merit, but the scope for journey reduction will be limited by the extra costs incurred by adding links into supply chains and the likelihood that there will be no support for operating costs. Land limitations will remain a significant issue.
24. Consolidation and distribution centres also only work for some sectors, there are a number of sectors where it does not and will not ever work, these include supermarket deliveries, high value goods, most pharmaceuticals, hazardous materials and products where cross contamination can occur. High Street consolidation centres will be a limited and costly solution at best.
25. The RHA welcomes the recognition of the importance of kerbside deliveries at 10.7.3, particular emphasis must be placed on providing adequate time for stopping and unloading at small high street based business premises that do not have off street loading and unloading facilities.
26. Expectations regarding modal shift (10.7.4) need to be realistic. Water freight on the Thames has been under used for several decades and does provide an opportunity in some circumstances. Rail is often network and site constrained. Modal shift will be very expensive in most cases and we would not expect it to have any impact at all on the growth of van use in the city.
27. Modal shift objectives will still need to consider the final mile delivery when modal shift is possible. The economic growth desired by the Mayor will be stifled unless proper consideration and provision is given to the need for road freight movement.
28. The economic growth desired by the Mayor will be stifled unless proper provision is made to meet the needs for road freight movement.

Suggestions to improve freight provision

29. The RHA believes that London's road space use can be improved which will lead to greater efficiency. Suggestions include;



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- Allowing HGV's to use bus lanes, this will free other road space, relieve congestion and improve air quality. (Bus lanes in Muswell Hill and Nine Elms have been successfully used in this way for many years).
- Missed deliveries (10.7.5) could be avoided by office deliveries, these would ensure the product is delivered first time and avoid the return to base and second delivery journey. This concept is supported by research carried out in 2017 by Prof Alan Braithwaite.
- The London Lorry Control Scheme was introduced in 1986 and is not fit for purpose. It adds mileage and emissions or operators choose to use smaller vehicles adding to congestion. At the very least the time window should be changed to allow unrestricted movements before midnight and after 05:00 on Monday to Saturday and movements after 08:00 to 20:00 on Sundays.
- The re-timing project has been successful and this needs to continue with TfL, Boroughs, Noise Abatement Society and the Mayor all working together.
- Any changes to vehicle specifications must be carefully thought out and planned to take into account the twelve year HGV life cycle.
- Priority given to faster roadworks and returning networks to full use after disruption.
- Ensuring that there is sufficient provision for lorry parking on new commercial developments.

Final Comments

30. Without road freight, supermarket shelves would be empty and the London economy would cease to function. We see that road freight is taken for granted by policy makers, the time has arrived where road freight must be prioritised and provided for as part of London's critical infrastructure.
33. Road freight must be embraced and facilitated, not hindered, so that the population of London has the commodities it needs to sustain the growth the Mayor seeks.

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