



**Response of the Road Haulage Association to
Transport for London.**

**“Cycle Superhighway 9 from Kensington Olympia to
Brentford town centre”.**

27th October 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. In London all food is delivered by Heavy Goods Vehicles.
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 will continue to work with authorities in London to promote safer roads for the benefit of all road users and pedestrians. The removal of one lane at any point on the CS9 route will lead to increased journey times and result in higher pollution levels where this road width reduction takes place, the RHA considers this is undesirable.
4. We would like to thank Transport for London for the consultation and the meeting hosted with other stakeholders to discuss specific issues relating to CS9 that will affect the road haulage sector.

General Comments

5. The RHA believes every journey matters for all road users and roads need to work well for all road users.
6. The online Consultation survey does not give the road haulage sector the opportunity to respond to elements of CS9 that will adversely affect deliveries, in a wider context. Because of this the RHA is submitting views on this Consultation by way of General comments.
7. The RHA has serious concern about the impact of removing one lane from the carriageway for Cycle Superhighway 9 (CS9) in the vicinity of the section of the South Circular Road and Kew Bridge and the subsequent effect on traffic flow at this location. In the event of a breakdown, emergency roadworks, or collision, this will totally block this one lane section of road, causing total paralysis in this area. The consequence of this will be to sever London, north and south of the river Thames. As CS9 will mainly be used during the morning and evening peak hours, there could be the ability for all vehicle use outside peak hours.
8. In the area of Ealing Road to Kew Bridge the TfL model shows additional delays in the PM peak hour of 7 to 9 minutes respectively. Also Chiswick Roundabout to Goldhawk Road a further 7 minutes, this will create more congestion and pollution than currently exists.
9. Modelled delay time does not tell the full picture, with capability removed the network resilience is destroyed. Any issues, such as vehicle breakdowns, burst water mains, even planned road works will result in more significant delays for all road users.
10. We need consideration to be taken of the additional space that articulated Heavy Goods Vehicles require (2.6 metres wide and up to 18.55m long) when using the roads and junctions on CS9, where the carriageway width is reduced to 3 metres.
11. Loading bays along CS9 should have a waiting time of forty minutes, not the current twenty. This is to take account of the additional time taken when negotiating active cycle lanes and unloading articulated goods vehicles.



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12. Loading bays must be level and level with the pavement so that wheeled baskets do not roll into either the road, or CS9.
13. Kerb side parking restrictions already burden operators and if there is a possible shift to more availability of kerb side parking for loading and unloading it would be welcome.
14. Deliveries to Public Houses must have loading bays in the immediate vicinity of the cellar door.
15. Loading bays must be of sufficient size, previously described, dedicated for the sole use of commercial vehicles only and sufficient loading bays to service local shops. To have laden HGV's driving aimlessly whilst waiting for a vacant loading bay will add to congestion and cause unnecessary pollution.
16. Rumble strips, previously tested on cycle lanes, could be installed on the approaches to loading bays to warn cyclists of an impending loading bay hazard and to take appropriate action.
17. Home deliveries - Reminder that deliveries are not only for businesses, there are a large number of home deliveries made every day. Need to ensure that home deliveries are possible.
18. 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. 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. Food, construction, other retail, servicing offices, fuel and waste handling are all sectors dependent upon road haulage in London.

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