



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

“The transformation of Oxford Street”.

15th December 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 road 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. It is essential that the number and area of loading and unloading sites is not reduced on current levels and that extra provision is made to cater for changed delivery patterns created by these proposals.
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 the transformation of Oxford Street, that will affect the road haulage sector.

General Comments

5. The RHA believes that the movement of freight is fundamental to the wellbeing of Londoners and their businesses - every journey matters for all road users, so the roads must accommodate the needs all road users whether personal or business.



The Road Haulage Association

6. The online Consultation survey does not give the road haulage sector the opportunity to respond to elements of the transformation of Oxford Street 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. We appreciate the accommodation that has already been designed in to facilitate the handling of goods into and out of the areas, but some concerns remain that we would like to be considered further.
8. The RHA has serious concern about the traffic flows along Wigmore Street to the north and Brook Street to the south; we are concerned that the displaced bus services from Oxford Street, will create additional congestion, due to the frequent stopping and starting from bus stops.
9. Road and junction layout and design; We need consideration to be taken of the additional space that Heavy Goods Vehicles require when using the roads and junctions affected by the proposed transformation, where the carriageway width is reduced by bus stops and loading bays.
10. Loading bays servicing Oxford Street could be improved with a waiting time of forty minutes, not the current twenty. This is to take account of the additional time taken to find addresses in the vicinity of Oxford Street when delivering to premises and unloading large goods vehicles.
11. Loading bays should be level and level with the pavement so that wheeled cages do not roll into the road.
12. Kerb side parking restrictions already burden operators and if there is a shift to more availability of kerb side parking for loading and unloading it would be welcome for operators and the shops they serve.
13. Deliveries to Public Houses need to have access to loading bays in the immediate vicinity of the cellar door, primarily for safety reasons.



The Road Haulage Association

14. Dedicated for the sole use of commercial vehicles, loading bays must be of sufficient number and size to service local shops and Home Deliveries to residential premises. To have laden HGV's and vans driving aimlessly whilst waiting for a vacant loading bay will add to congestion and cause unnecessary pollution.
15. Loading bays need to be useable for deliveries and collections all day, every day.
16. Failing to accommodate freight will 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.

15th December 2017

Tom Cotton.

Head of Licensing and Infrastructure Policy

Road Haulage Association

t.cotton@rha.uk.net