



Response of the Road Haulage Association to Transport for London.

“New proposals to improve Air Quality”.

18 December 2016

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.

General Comments

2. Transport for London launched a consultation in October 2016 seeking views on the Mayors proposals to improve air quality in London.
3. Responses took the form of an online survey, titled “New proposals to improve Air Quality - Have your say on the introduction of a new Emissions Surcharge and ideas for improving Ultra Low Emission Zone”. The responses below are taken from the RHA online response to that survey.

Responses to the Questions

Part 1 - Emissions Surcharge

1. To what extent do you support or oppose the introduction of a new £10 Emissions Surcharge on the Congestion Charge to discourage the use of older, more polluting vehicles in central London to improve air quality and health?

RHA Response: Support

2. We are proposing that the Emissions Surcharge will start on 23 October 2017 as the earliest possible operational date for implementing the scheme. Do you agree with this implementation date?

RHA Response: Don't Know

3. Following the start of ULEZ in central London, to what extent do you support or oppose residents continuing to be liable for the Emission Surcharge, at the discounted rate of £1, during the ULEZ sunset period (for the first 3 years, while residents do not pay the ULEZ charge)?

RHA Response: Neither support nor oppose

4. To what extent do you support or oppose the exemption of historic tax class vehicles?

RHA Response: Neither support nor oppose

5. To what extent do you support or oppose the exemption of Showmans vehicles?

RHA Response: Neither support nor oppose

6. Do you support or oppose including L-Category vehicles (e.g. three wheeled vehicles and quadricycles) that currently pay the congestion charge?

RHA Response: Neither support nor oppose

7. Do you support or oppose including 9+ seater vehicles, such as coaches, buses and minibuses?

RHA Response: Support the inclusion of all 9+ seater vehicles

Part 2 - Bringing ULEZ forward to 2019

8. Do you support or oppose the idea of bringing forward the introduction of the central London ULEZ to 2019 to improve air quality and health?

RHA Response: Strongly oppose

Part 3 - Expanding ULEZ to inner London

9. Do you support the overall principle of expanding ULEZ (up to but not including) the North and South Circular roads for all vehicles?

RHA Response: No



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10. When do you think the expansion of ULEZ (up to but not including) the North and South Circular roads for all vehicles should be introduced? Please choose the year you think would be most appropriate.

RHA Response: I do not support the expansion of ULEZ

11. An expanded ULEZ will affect many more cars, vans and motorcycles. Do you think the daily charge for the ULEZ in inner London (between the Congestion Charge zone and the North and South Circular roads) should be the same or different to the current charge for the ULEZ in central London?

RHA Response: The daily charge should be the same for light vehicles at £12.50

Part 4 - Expanding ULEZ Londonwide

12. To what extent do you support or oppose the overall principle of expanding ULEZ London-wide for heavy vehicles?

RHA Response: Neither support nor oppose

13. When do you think the expansion of ULEZ London-wide for heavy vehicles should be introduced? Please choose the year that you think would be the most appropriate.

RHA Response: I do not support the expansion of ULEZ

Part 5 - Further comments

14. If you have any further comments about any of the proposals to improve air quality in London, please write these in the box below.

RHA Comments:

- i. We recognise the need to improve air quality for the benefit of Londoners. The cause of air quality problems are varied, including the failure of many vehicles to perform to their Euro emission standard in real world operation, the concentration of pollution due to tall buildings and the proliferation of pollution sources other than transport.
- ii. Measures to improve air quality should be costed, targeted on where they deliver most benefit, and should be proportionate. Air quality measures should optimise productivity and competitiveness wherever possible.

- iii. The mayor must be wary of measures that could favour large firms over small companies, either directly or in practical effect, and we have a number of concerns in that regard with the current proposals. London must be a place where quality companies of all sizes can flourish.
- iv. Euro VI diesel HGVs (and buses) perform in the real world to the low NOx emission level that the standard intended. They are described by TfL as ultra-low emission. We note that TfL's estimates show that the previous mayor's ULEZ 2020 plan will result in a halving in the proportion of road transport NOx generated by HGVs by 2020 compared with 2013, to: 11% in Greater London; and 8% in Central London.
- v. Under the previous mayor's ULEZ 2020 plan, TfL estimates that HGVs will contribute less than 2% of total NOx in Central London and 4% in Greater London. https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-2/user_uploads/consultation-information-document.pdf pages 22 and 23.) The industry will be well on the way to adopting Euro VI HGVs by 2019, and therefore achieving these low levels of pollution, without having an additional mandatory requirement.
- vi. Proposals to bring forward the introduction of the 2020 ULEZ for HGVs, and to widen the zone to include essentially the whole of London, are disproportionate and damaging to business; and they are uncoded.
- vii. We are mindful of the mayor's election commitment to understand and reflect business needs in his policies. Most firms have planned their business around the 2020 ULEZ and the impact of a change at this stage will be especially damaging in the current economic climate, in which transaction prices for new trucks, and leasing rates, are expected to rise sharply due to changes in the currency market and economic uncertainty.
- viii. Smaller haulage firms are likely to be disproportionately hard-hit. These firms typically buy their vehicles as their main asset. Significant numbers of firms will be weakened or go out of business, weakening the London economy.
- ix. We fear other unintended consequences if the ULEZ is brought forward or widened. One would be to give additional impetus to the trend to replace HGVs around 7.5 tonnes with larger numbers of vans - which at present perform less well against Euro standard in real-world operations - generating more congestion and increasing pollution.
- x. Changing the existing 2020 ULEZ plan for HGVs in this way would set a very bad precedent. Firms - of all sizes - must be able to have confidence that the decision of one mayor will not be over-turned at short notice by his successor without strong justification, and that justification appears to be lacking here. London must avoid getting a reputation for being an unpredictable or unreliable regulator.

- xi. No additional requirements should be imposed on HGVs that are not also imposed on cars, vans, taxis and buses. Were additional burdens to be imposed on HGVs, which the RHA opposes, then financial support should be available to operators, and especially to smaller haulage firms. We note that publicly-funded incentives are available to both bus and taxi operators.
- xii. Measures such as bringing forward the ULEZ standard, widening the area of application or investing beyond Euro 6/VI vehicles operating to standard in the real world, should they be introduced at all, should be focused on buses. Buses offer greatest benefit/cost, by a large margin - for example, they do eight times the distance/vehicle of HGVs in London. Also, commercial impact on operators is less problematic. Upgrading the bus fleet to newer, smoother-running vehicles has been shown elsewhere to attract more people to use buses.
- xiii. We note the NOx retrofit programme for London buses. We doubt that a similar programme is desirable or technically practical for HGVs. London buses have few variations in driveline, far fewer operators, higher vehicle values and longer potential life cycles. Bus operators can retrofit with more technical confidence and a better benefit/cost ratio in terms of air quality.
- xiv. We recognise the dilemma facing the mayor in relation to diesel vans and cars, which are not yet delivering to standard in terms of their NOx emissions in real world operation - in contrast to heavy duty diesels in HGVs and buses - although we understand that issue is likely to be resolved for all vehicles by 2019.
- xv. We are concerned that the high number of vans on London's roads may be thought by some to be freight vehicles. Some vans are - but the large majority are service vans and do not carry goods [for delivery to businesses or consumers]. At the same time, the potential of home delivery vans to replace cars must be recognised. In terms of air quality, a car going to and from shops is in effect a freight vehicle, just as much as a van delivering parcels or shopping, although this is rarely recognised by policy-makers.
- xvi. The mayor should encourage greater use of HGVs which, when used effectively, have the ability to replace a larger number of freight vans. A recent London Freight Forum meeting heard from local authority sources that we need more HGVs, to replace work done by vans. The productivity potential of lorries, which can replace up to 30 vans, is insufficiently recognised.
- xvii. We support efforts to promote the availability in the medium-term of hybrid diesel/electric HGVs and vans that are operationally and financially viable for urban transport. As with hybrid buses and cars that are currently available, they would have the benefit of greatly reducing the amount of time the engine spends running while stationary or at low speed.

- xviii. Methane has been proposed by some as a fuel for HGVs but we have strong reservations as to its suitability. It is far from clear that the taxpayer subsidies needed to make methane attractive can be justified in any part of the transport sector but it is less difficult to make the case for service buses than for HGVs. Bus engines run throughout the day, and increasingly at night, where people live and nowhere else. The impact on competition of promoting subsidised methane to bus operators is much less of an issue than in the HGV sector.
- xix. As a general observation on the consultation, we would like to have seen much more detailed assessment of the costs and benefits of proposed measures.
- xx. Greater emphasis should be given to improving traffic flow, rather than in the main proposing measures against vehicles. The deterioration in air quality in London, especially in central London, is caused in no small part by increased congestion caused by the policies of TfL and other infrastructure providers. Prince Michael of Kent, president of the RAC, has described road congestion as "disastrous and out of control", and he and others have called for a re-appraisal of cycle lanes.
- xxi. Increased congestion has had a particularly negative impact on the attractiveness of bus services, which are so important in terms of both the economy and reducing the number of cars on the road; and HGVs, which are highly efficient vehicles for the movements of goods and materials into and out of London. They have also impacted on freight and service vans, increasing both cost and pollution.
- xxii. London is a 24-hour city and London regulators need to facilitate more 24-hour freight transport. HGVs would be able to operate much more cleanly if the London Lorry Control Scheme were scrapped and there was greater freedom to deliver at night, avoiding costly and polluting congestion. This would also boost productivity and competitiveness and reduce overall congestion.
- xxiii. HGVs - which in this context we can call buses for freight - should have access to bus lanes at times when the impact on bus services would be minimal.
- xxiv. TfL has for many years talked of the need for collection and delivery provision to be included in planning consents for buildings but little progress has been made in this area. That needs to change, to reduce the impact of delivering vehicles.
- xxv. London's road infrastructure providers should make greater application of "big data" to improve traffic flow, providing all road users, but especially commercial users, with timely and useful information.
- xxvi. Mayor Khan has said that he seeks to reduce the number of large lorries on the city's roads, particularly at the busiest times. In that context, it is important that he recognises that HGVs are good - indeed essential - for London.



The Road Haulage Association

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