

Department for Transport 48 tonne intermodal freight trial consultation

Cycling Scotland submission December 2020

Question 1 – Should a trial of 48 tonnes maximum laden weight on specific routes for domestic intermodal routes in principle be permitted?

We are firmly opposed to a trial of 48 tonnes maximum laden weight on specific routes. Increasing the permitted weight from 44 to 48 tonnes will have significant negative safety implications, particularly for vulnerable road users like people cycling. Heavy goods vehicles are a significant risk to people cycling on the road, at their current weight and size. This risk will be amplified and further increased with heavier vehicles.

The accompanying impact assessment document in paragraph 26 states “...*this trial will not be able to give a definitive answer on how safe operation of 48 tonne HGVs for intermodal freight generally would be*”¹. The document goes on to further state in paragraph 77 “*the vehicles would be carrying higher weights... and could likely increase the frequency/severity of accidents generated from their usage*”². This is problematic and clearly highlights a significant level of risk and safety concern remains for heavier vehicles, which is unacceptable. As the trial will not be able to prove that 48 tonne HGVs can be operated safely, the increased weight capacity should not be permitted in any circumstances.

Permitting heavier vehicles also has significant costs for the public purse, with bridges and other road infrastructure requiring significant upgrades to be able to accommodate the heavier vehicles. In particular, there are many roads in rural Scotland that would not be able to cope with heavier vehicles, resulting in significant negative consequences for safety, the local and immediate surrounding area, and broader environmental impacts.

The consultation document does not provide any information on what the specific (or designated) routes for the trial(s) will be, how these routes will be determined and what factors will be used in assessing the suitability of routes. This should be clearly outlined.

Question 2 – Should a trial be restricted to intermodal journeys with a rail leg or also include journeys with a water leg?

N/A

Question 3 - Is 50 miles the right maximum distance for any road leg? If no, should the distance be shorter, longer, no distance limit?

N/A

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/933312/48-Tonne-Intermodal-Freight-Trial-Impact-Assessment.pdf

² Ibid, paragraph 77

Question 4 – Is four years the right duration for a trial? If no, should it be shorter or longer?

As previously stated, the accompanying impact assessment document outlines that the trial(s) cannot prove and evidence that heavier vehicles can be operated safely. This being the case, the duration of the trial is inconsequential, as trial(s) should not be permitted in the first instance.

Question 5 - Does the attached impact assessment consider the main likely effects of a trial sufficiently? Are there any additional effects / impacts that you think have not been reflected?

The impact assessment does account for and acknowledge that each kilometre driven in a heavier HGV may have negative safety consequences for “people, structures and infrastructure”. Despite this, however, it does not account for the impact/effect of a trial on the safety of people cycling and other vulnerable road users. The significant negative impacts for people cycling are not mentioned anywhere in the impact assessment and is a major omission.

Question 6 - Do you have any views on the potential trial designs discussed in the impact assessment, or suggestions of alternative ways to source counterfactual data?

N/A

Question 7 - Should a local authority be able to block the introduction of routes if a trial route would incur excessive costs related to assessment and strengthening of specific structures? Is between £0.15m and £0.5m a suitable level for excessive costs? Should Local Authorities be able to seek financial contributions for such costs of up to 50% from participating operators?

Local authorities should be able to ban the heavier HGVs on their entire road network. In Scotland, the trunk road network is operated and maintained by Transport Scotland, with local authorities having responsibility for all other roads in their respective area(s). We note the consultation document states infrastructure issues, such as those with bridges and road surfaces, are more likely on local authority roads. In this regard, local authorities should be able to ban heavier vehicles on their roads.

There is already a major shortfall in maintenance of local roads, estimated at around £1.8bn by Audit Scotland, and this should be addressed first before any trial like this is even considered.

A possible compromise would be to restrict these heavier vehicles to motorways and the trunk road network, which are recognised in the consultation as being more suitable to accommodate heavier vehicles.

It is local roads, operated and maintained by local authorities, that are the roads most frequently/commonly used by people cycling for short everyday journeys. In this regard, such vehicles should be able to be banned from using local road networks. In our recent response to the Scottish Government’s consultation on Scotland’s Road Safety Framework to 2030, we argue that a key aspiration for improving road safety should be to pursue the principle

that HGVs and bikes should not have to share the same road space³. This means managing HGVs on roads that people are cycling on (and people are walking on), during times they are likely to be cycling and ensuring there is separate, appropriate space for cycling. As a minimum, the trial must ensure that the specific routes do not include roads that are frequently used by people cycling.

Question 8 – Do you have any further comments?

Any analysis needs to take into account the climate change impact of this move, as the comparator should be of moving the same amount of freight by rail (or, where relevant, water), than by road.

Cycling Scotland runs a training course for HGV drivers called Practical Cycle Awareness Training (PCAT) which allows drivers of large vehicles to step into the shoes of more vulnerable road users, including those on bikes, on foot and those with disabilities to provide them with a greater understanding of their needs⁴. Similar courses, such as Safe Urban Driving, are offered in England. In line with the proposed trial and the known safety risk of HGVs to people cycling, and other vulnerable road users, we would like to see PCAT and similar training courses being rolled out for all HGV drivers, with a particular focus on drivers who use routes that are used regularly by people cycling. This should not simply be restricted to the specific routes proposed for the trial.

³ <https://www.cycling.scot/mediaLibrary/other/english/8631.pdf>

⁴ <https://www.cycling.scot/what-we-do/training/practical-cycle-awareness-training>