

Consultation on the possibility of allowing an increase in the length of articulated lorries (DFT-2011-06)

The London Forum of Amenity and Civic Societies speaks for over a hundred local societies across London with more than 100,000 members. In what follows we only refer to those questions where we have relevant comments.

Q1. Do you agree that the research has identified the correct sectors that would be engaged in the introduction of high-volume semi-trailers? (See Report Section 4.4, page 20). If not, how and why would other sectors be engaged?

The issue of longer lorries will concern and have an impact on many local communities and the wider public, and they should therefore be fully engaged in this consultation. Furthermore, failure to maintain sufficient public confidence in the nature of freight operations is likely to lead to demands for increased restrictions and thus increased costs for the freight industry.

Q4. The research concludes that the greatest benefit derives from allowing increases of up to 2.05 metres in semi-trailer length (Section 6.3, pp 35-39). **Do you agree with this assessment?** If not, please give your reasons including supporting evidence. If there is particular data in the Impact Assessment that you disagree with please supply us with evidence to update our assessment.

The document fails to make the case because of a wholly inadequate assessment of a range of externalities, in particular the failure to make any allowance for infrastructure costs or for additional tonne-km induced by the reduction in direct operating costs (and consequential impact on safety, emissions and congestion). If the increase in length were nonetheless to go ahead, then we regard it as essential that there should be simultaneous implementation of various other measures designed to reduce accidents involving HGVs, both to maintain public confidence and because the costs of such improvements could be met from the reduced operator costs of the longer lorries. The combination would be seen as a balanced package.

Q8. Are there any other costs or benefits that we have not identified of introducing high-volume semi-trailers? Can you provide evidence on their magnitude to individual companies or to the industry as a whole?

Yes, increased infrastructure costs (see Qu 16).

Q16. The Impact Assessment assumes (see Summary tables) that there will not be a need for significant changes to road infrastructure from the introduction of high-volume semitrailers, as the overall length would not exceed that of a rigid truck / drawbar trailer combination already allowed on the UK's roads. **Do you agree that this is a valid assumption? If not, please give your reasons: eg are there**

potential constraints with loading bays? or at lorry parking facilities?

We regard it as wholly incredible that increasing the proportion of longer length HGVs from around 2% to nearly 50% (para 113-115 of the cost benefit analysis) will have no impact on infrastructure costs. The layout required to keep infrastructure damage to reasonable levels must surely change, so in addition to any increase in actual damage, these must include the costs to local authorities of assessing and implementing modifications both to the infrastructure and to the measures needed to prevent longer HGVs using inappropriate roads.

Q23. If the proposed modifications to articulated lorry and semitrailer length are permitted (either in a trial or through amendment of existing legislation), **what is a reasonable estimation of the time that would be needed** to enable industry to make the appropriate investment and acquire new vehicles?

Especially given the need for assessment and implementation of modifications to infrastructure and signage, we believe that the absolute minimum would be 2 years. This would also give time for the development of improved steering technology, so that levels of performance could be maintained.

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