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Dear Sir / Madam,

Heavier, 48-tonne, intermodal freight trial

Railfuture is Britain's leading, longest-established, national independent voluntary organisation campaigning exclusively for a better railway across a bigger network for passenger and freight users, to support economic (housing and productivity) growth, environmental improvement and better-connected communities.

We seek to influence decision makers at local, regional and national levels to implement pro-rail policies in transport and development planning.

Railfuture's aims and supporting activities include to increase the volume and proportion of goods moved by rail in Britain. We recognise that in order to prosper, rail freight must be seen as part of the wider freight and logistics network, and we work with like-minded organisations such as the Rail Freight Group and with local authorities to help make beneficial change happen. We believe firmly that freight movements should operate in a sustainable way, minimising environmental impacts and to that end policies and practice should encourage and enable progressive modal shift of freight from road and air to rail.

Please find below our responses to your consultation questions.

Yours faithfully,

Roger Blake BA, MRTPI (Rtd), MTPS
Railfuture
Director for Infrastructure & Networks, national Board

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Question 1

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

We support the proposal for a trial to go ahead, restricted to repetitive intermodal journeys with a rail leg, and a restriction that any road leg be no more than 50 miles. There should be strict monitoring and reporting requirements.

We note, as does the Rail Freight Group, that the current proposals would not permit general circulation. We associate ourselves with the RFG's observation that the previous increase to 44 tonnes for journeys to railheads was permitted for all vehicles within 5 years, and that this must not be repeated with this proposal for an increase for rail to 48 tonnes.

Question 2

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

We are unable to offer an informed comment on the relative merits of this.

Question 3

Is 50 miles the right maximum distance for any road leg? If not, should the distance be shorter, longer or should there be no distance limit?

Yes, 'up to 50 miles' is an appropriate distance, but only on surveyed, designated and signed-off routes. These routes must be put into the public domain. There definitely should not be a "no distance limit".

As more strategic railfreight hubs are developed the distance travelled to any one end-user will shorten. The Department should continue to work with interested and affected parties seeking ways to encourage the development of such terminals in areas where so far they do not exist, for example in Devon and Cornwall, East Anglia and the London region.

Question 4

Is 4 years the right duration for a trial? If not, should it be shorter or longer?

The proposed trial period is fairly short particularly as the impact assessments suggest the decision might be taken after only two years. Given the number of potential railfreight terminals from which suitable routes will have to be assessed, a longer period may well be needed in order to be able to do the exercise with the necessary rigour and transparency.

Question 5

Does the impact assessment consider the main likely effects of a trial sufficiently?

We trust that the necessary assessments will be carried out with due diligence. We do however draw attention to some potential Unintended Consequences in our response to Question 8 below.

Are there any additional effects or impacts that you think have not been reflected.

The trial of rail-borne containers being loaded up to 48 tonnes should, we believe, enable existing railfreight customers being retained, and new customers being encouraged to make the modal shift to railfreight.

At all seaports, containers weighing over 44 tonnes should automatically be consigned to rail. Severe penalties should be applied to port operators and hauliers which allow overweight containers onto the public highway. There is not clarity concerning this latter point in the Consultation.

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?

We are unable to contribute any comment on this.

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 £0.15 million and £0.5 million 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?

We concur with the proposals in the consultation upon which these questions are based.

We note that since this consultation was launched in November 2020 the House of Commons Transport Committee in December 2020 launched an inquiry into zero emission vehicles and road pricing. As and when any 'pay-as-you-drive' system is introduced then inclusion of vehicle weight could serve as a behaviour-influencing and enforcing factor.

Question 8

Do you have any further comments?

Unintended Consequences

We concur with your summary "*for the public interest, this proposal seeks to encourage a modal shift from road to rail and supports intermodal journeys. By removing lorries from the road or reducing the distances they travel, it aims to lead to lower emissions and reduced congestion, and may marginally ease the shortage of available HGV drivers.*"

However, public scepticism remains, as quoted here from a Cambridge local newspaper: "*....But there is little our local authorities can do to prevent such vehicles using unsuitable roads or streets. These long or heavy vehicles damage our roads and endanger people. Originally 44-tonne lorries were only permitted to move containers from a 'railhead' to a local destination. Now they can go almost anywhere. The rule of thumb is that the damaging power of an axle load is proportional to the fourth power of an axle load. A 6-axle, 48t lorry will do around twice the damage of a 40t one. It would take five 4-axle 24t lorries to do the damage of a single 6-axle 48t one. Even the cost of strengthening required local authority bridges can be enormous. We need more capacity and more electrification of our railways, to carry containers from Felixstowe and hence keep them off the A14.*"

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We are assuming that this consultation refers to containers even though the Consultation makes limited reference to them. This point must be given greater clarity as a 15% increase in HGV weight could, theoretically, open up the possibility of them using a rail-served stone terminal loading to 48 tonnes for onward delivery. We reiterate that although this is clearly not the intention of this trial, this aspect needs to be more clearly defined in the main body of the report.

To that effect, we endorse this note from the Rail Freight Group:

“Our members are however concerned to ensure that by supporting an increase in road weight for rail, we do not ‘open the door’ to a generalised increase for road freight. Analysis undertaken by MDS Transmodal demonstrates that a generalised increase could undermine forecast growth in many market sectors including intermodal. Although we fully understand that the current proposals would not permit general circulation, the previous increase to 44t for journeys to railheads was permitted for all vehicles within 5 years, and it is imperative that this is not repeated with any increase for rail to 48 tonnes.”

Eurotunnel

The proposal specifically excludes Channel Tunnel Euroshuttle trains, which is to be welcomed. However, the Channel Tunnel operators have in the past attempted to set up trans-shipment depots on the Kent side of the Channel either within or close to the Folkestone terminal to transfer from continental rail wagons to HGVs within the UK. The Channel Tunnel exclusion needs to be tightened to prevent this happening. One possible solution would be to insert a clause that the UK rail leg must be, say, double the length of any single road leg for the trip to qualify. We are cautious as in the past the best thought-up plans were circumvented; for example, traffic from Scotland to Europe qualified for the original 44 tonnes exemption even though it was only loaded to rail at Didcot.