

## **RHA general comments ahead of the Public Accounts Committee inquiry into the effectiveness of the Welsh Government's approach to the maintenance and enhancement of the trunk road network**

As the leading trade association for the road haulage industry the RHA is keen to contribute to the Public Account Committee's consideration of effectiveness of the Welsh Government's approach to the maintenance and enhancement of the trunk road network.

The road haulage and logistics sector provides much employment in Wales and through its collections and deliveries of essential goods supports the wider business community, as well as the public sector and the general public.

Now is a crucial time for the haulage and logistics sector, with the economy recovering, but the forthcoming General Election meaning that there is uncertainty in the business community about which economic policies will be pursued, but also what policies will be adopted at a UK level concerning infrastructure development and the funding of roads.

The RHA well works with the Highways Agency, soon to be Highways England. We keep abreast of the Agency's strategy and plans for improving and maintaining the road network it oversees, through roads building, dualling of some roads, as well as its programme of introducing smart motorways, and related technology that helps smooth the flow of traffic and alleviate congestion as well as improving road safety. We welcome much of what the Highways Agency has done, while reserving the right to challenge the Agency on certain issues. In the same spirit, we are pleased that a strategic review of the management of the trunk road network in Wales is now underway and look forward to constructive engagement with as the Public Accounts Committee considers maintenance and enhancement of the trunk road network.

We are not commenting in terms of any formal analysis of the costs and benefits of spending particular sums of money, but have taken a more general approach of pinpointing which schemes we think are worth pursuing in terms of value for money, as well as the best use of resources to support the economy in Wales.

The RHA has been involved with the work of the Freight Task and Finish Group and we are delighted that many of the issues we have raised in this work has been taken on board.

In our view the National Transport Plan does demonstrate a good level of understanding of the issues faced by the road haulage industry in Wales, although there are some issues of detail that we would like to be taken on board. We will address these below.

However first we would like to turn to the content of the National Transport Plan and say that, we welcome the recognition in the National Transport Plan that transport is at the heart of life in Wales, with all other services dependent on it in one way or another, and we agree with the statement at 3.4.1 that "Freight transport is an essential part of a thriving economy and of people's everyday life. It is dominated by the private sector – businesses moving goods and materials for other businesses, but it relies on infrastructure that is often provided, managed and maintained by the public sector, be it at national or local level."

We also note and agree with the passages from 3.2.17 to 3.2.19 of the consultation document that, “The nature of the trunk road network in Wales is such that it provides critical connectivity for many communities, including in rural areas and deprived communities.....An efficient, effective trunk and motorway network has an important role to play in supporting the Welsh economy enabling access across Wales and cross-border for people and freight. It helps businesses to be competitive, reducing transport costs, allowing speedy and reliable movement of goods and products and access to a labour force. Delays on the network and unreliability in journey times, affects productivity and reduces access to markets. Congestion can increase emissions from transport and schemes that reduce congestion can reduce this and improve local air quality. Similarly the network has an important role to play in enabling people to access services.

A key driver for investing in new major enhancements to the trunk and motorway network is to stimulate the economy.”

Given all of these assertions we trust that the views of the RHA as the leading trade association for the hire-and-reward sector of the haulage industry will be given due weight.

Below are set out a list of issues that, in the view of the RHA, should be factored into the National Transport Plan, and which affect whether the spending priorities of the Welsh government to the trunk road network will prove to be efficient and cost effective, and in the long term will boost the economy in Wales.

### **Congestion and road capacity**

Members of the RHA have expressed concern about congestion and lack of capacity on certain routes, given that hauliers make many of the longer journeys on the trunk road network in Wales and so have a keen interest in any efforts to that seeks to improve routes and increase capacity. Commercial vehicles also make many local deliveries moving goods over shorter distances on the “last mile” or “last leg” deliveries.”

Our members report unreliable journey times and traffic congestion, particularly during rush hour, as being common on the existing M4, and so we have already supported plans to redevelop the M4 Corridor around Newport by building a new section of 3-lane motorway to the south of Newport. It is our view that the road cannot cope well with current traffic levels, and so future growth in traffic will present serious capacity problems if no action is taken.

The RHA has supported the introduction of a variable speed limit system in 2011 of the M4 between Junctions 24 and 28 to improve traffic flow in the short term. We note that the system has resulted in a reduction in accidents and welcome this trend. However in the view of the RHA the building of a new road would address capacity and safety concerns more fully.

We would hope that as part of the review of the operation of the trunk route network, efforts are made to identify congestion hot-spots as well as the rat-run routes that are used by trucks when main roads are too busy, so that any new infrastructure development can act to relieve existing problems.

Dealing with and minimising congestion can help reduce carbon emissions and air pollution.

### **Consolidation centres and freight parks**

Planners need to think about whether and where it is appropriate to create freight consolidation centres close to urban areas that allow large trucks coming off the motorway system to deliver goods, which are then taken on to their ultimate destination by smaller commercial vehicles. If properly planned, such centres can work well.

However we would not like to see significant numbers of local depots close to accommodate one exclusive freight consolidation centre as this might negatively affect the diversity and flexibility of provision within the area.

### **Lorry parking and loading**

We would also like to see planners take more seriously the need for provision of secure lorry parking sites, particularly near interchanges and major retail or industrial sites. At present, there is a shortage of sites, creating issues in terms of security of load and driver and road safety.

It is essential that drivers should have easy access on long journeys to refreshments and bathroom facilities. If such facilities are not available, then drivers may stop at inappropriate locations that cause inconvenience to local residents and other road users.

The tachograph rules require drivers to take regular rest breaks and so the development of comprehensive facilities can only be of benefit to the haulage industry and local residents alike.

The lack of secure facilities also means that drivers and their loads are at greater risk of crime, as high value loads have to be parked at the roadside. With the planned closure of facilities such as public toilets across the country, due to local authority spending cuts, the situation is likely to get worse.

We urge you to insist that such parking areas have bathroom facilities incorporated which visiting truck drivers are allowed to use. Unfortunately it is the case that even after long journeys some customers refuse to allow HGV drivers to use staff toilets. Such an attitude leads to discomfort and inconvenience for drivers who may then use lay-bys or other inappropriate sites to relieve themselves.

We would also like to emphasise that as well as parking facilities, trucks need loading and unloading provision at high street shopping centres for example, and any lack of adequate provision can also cause difficulties for other traffic, pedestrians and for the shop owners being served by hauliers.

### **Delivery Restrictions/Quiet deliveries**

We would ask that consideration is given to the lifting of any night-time delivery restrictions that force truck operators to use the roads at the most congested times. If vehicles can deliver to retail premises and depots in off-peak hours then trucks will not be on the roads at the busiest periods and so there should be air pollution reduction and carbon saving, as well as road safety benefits. The Noise Abatement Society ran a number of quiet delivery trials in 2009/11, which demonstrated that such initiatives could work very well. Details of the scheme can be found by clicking on the link.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/4007/quiet-deliveries-demo-scheme-final-project-report.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/4007/quiet-deliveries-demo-scheme-final-project-report.pdf)

The Department for Transport has produced quiet deliveries good practice guidance for local authorities, as well as hauliers, which you can find by going to the link below.

<https://www.gov.uk/government/publications/quiet-deliveries-demonstration-scheme>

### **Freight Priority Lanes**

We would ask that a study is made of introducing priority freight lanes in the area. Freight priority lanes also called “no car”, “high-occupancy vehicle” or “essential-user” lanes permit trucks to use bus lanes at certain times of day, which increases capacity for other road users in normal traffic, at the same time as ensuring that lorries carrying essentials do not become snarled-up in heavy traffic. Where congestion is an issue, particularly in the proximity of retail and commercial premises, some councils have agreed to include goods vehicles amongst priority road-users. We would like to emphasise that priority lanes help to ease congestion, reduce emissions, and make freight delivery more efficient.

### **Segregated cycling infrastructure**

We acknowledge that the existing roads infrastructure in Wales has not been designed to accommodate cycling as an integral and significant part of the transport system. We would welcome moves to make standard the consideration of the needs of cyclists as a part of the roads design process.

We understand that in countries where more people cycle routinely, it is common to have cycle routes completely segregated from other road traffic. The RHA would support the allocation of resources to the development of viable networks of cycle routes that are separated from motorised traffic.

### **Traffic management, Signage and Intelligent Transport Systems**

We hope that new road development in Wales will make use of the most up-to-date technology for traffic management.

We know that that inappropriate routing of traffic, including HGVs, through some areas is a problem. We suggest that technology now offers many ways in which all traffic can be successfully managed. However investment in intelligent transport systems, proper signage, traffic light sequencing technology, as well as major investment in town centre by-pass routes is needed before these benefits can be realised.

We would like to see proposals included to upgrade IT systems in order to provide improved real time travel information. Hauliers have themselves already embraced the use of intelligent transport technologies which help in the efficient running of their businesses.

We would also like to say that the positioning of road signs is important. Good signage helps drivers to find correct places to park and load, but also to avoid the risk of trucks, for example, hitting low bridges because signs are in the wrong place or because the bridge sign gives insufficient notice for the driver to divert before approaching the bridge. Bridge strikes can result in massive disruption whilst the driver tries to turn the vehicle round or gets stuck.

### **Multi-modal goods transport**

We would ask any new transport authority to bear in mind that regardless of which transport mode is used, road will remain an essential component of any future road haulage strategy, since trucks usually undertake “last mile” or as the National Transport Plan says “last-leg” deliveries once goods are unloaded from rail, air or water freight terminuses.