



Transport Action Network

Response to:

**Longer semi-trailer trial
consultation**

Introduction

Transport Action Network (TAN) would like to express its concern at the way that the impact of longer semi-trailers (LSTs) on local communities is being downplayed while the supposed economic benefits are overstated. As the consultation acknowledges not all impacts have been costed, resulting in overinflated 'benefits' for all options. However, this ignores the fact that [HGVs only pay around one third of their costs for using the roads](#) and the impact these longer lorries risks further externalising their costs on already cash-strapped local authorities and their communities.

We also find the argument for the need of LSTs because of a driver shortage as unconvincing, given the recent rises in unemployment which is only likely to increase as lockdown continues and more businesses fail. In addition, many firms are now having to relocate to the EU in order to continue to trade, or give up exporting altogether, so it is likely that there could also be a drop in freight movement going forward due to Brexit alongside other factors such as the fall in GDP and population projections.

The need for a properly monitored and independent trial

We are strongly against the widespread use of 15.65m longer semi-trailers (LSTs) – total lorry length of 18.55m. The trial should continue until it is due to end in 2027 with the collection of proper, independent and verifiable evidence as to the impact of these longer lorries on our roads and communities. Only then should an informed decision be taken on their future role.

Relying on operators to report any incidences is not going to lead to a true level of understanding of any impacts of LSTs as it is not in their interests to do so. They may also not be aware of the full level of damage they do given the significant blind spot when these lorries are turning. This is another reason for independent monitoring and a proper study of the full impacts of LSTs.

Nothing within this consultation reassures us about these concerns and as such this current consultation is flawed being reliant on potentially misleading information.

Capturing the true economic costs

The analysis presented in the consultation has a very low level of non-business costs, which underlines our concern that the true costs of LSTs on local communities are not being properly assessed. There are a number of costs linked to the greater use of LSTs which do not appear to have been captured, including:

- increase impact on buildings, including strikes and vibration
- damage to pavement due to tire scrub and overrunning of kerbs
- damage to street furniture

- impact on active travel – directly due to increase in perceived road danger and indirectly due to the need to redesign junctions to accommodate these larger vehicles (see below)
- impact of heavier lorries on road maintenance before the proposed weight increase to 48 tonnes.

Alongside the underreporting of economic costs, which the consultation acknowledges to some extent, there is also a concern that the economic benefits have been inflated to make this proposal appear more attractive. However, the error runs deeper than that as the true cost of operating lorries on the roads is not factored in either. Far better economic outcomes might be achieved by charging HGVs the true cost of operating on our roads leading to a major switch to rail freight, reducing congestion, pollution and road danger in the process. This would likely to reduce the levels of empty running and likely reduce the perceived benefits of LSTs being claimed here.

Heavier lorries have more impact

If the proposal to increase the maximum permissible lorry weight to 48 tonnes is approved alongside longer trailers, it could mean that more lorries are operating at higher weights on our roads which will lead to much higher damage and maintenance costs. The two consultations should have been combined and run as one so that the cumulative impacts of the two proposals could be properly considered and assessed.

Increasing permissible lorry weight from 44 tonnes to 48 tonnes alone leads to a 42% increase in damage per lorry as governed by the ‘fourth power rule’ which is referenced on page 6 of the [CD224 ‘Traffic Assessment’](#) (March 2020).

We do not believe longer trailers and heavier lorries should be allowed on our roads until they start paying for the true costs of using them. Currently HGVs pay less than [a third of the external costs they place on society](#) giving them an unfair advantage over rail freight. This is likely to increase with heavier lorries.

Impact on local communities

Operating in urban areas these longer lorries risk impacting on local communities in several ways:

1. Requiring junctions to be widened (with larger flares) to accommodate these longer vehicles to reduce their outswing of nearly 3m ([see diagram on page 2 of Campaign for Better Transport briefing](#)). Wider, flared junctions will disadvantage people walking and cycling as follows:
 - a. Increasing the pedestrian crossing distance or pushing the crossing away from the junction, off the ‘desire’ line, increasing delay and inconvenience

- b. Increasing traffic speeds as larger radii encourage higher speeds at junctions which are normally the most dangerous place on the road network, putting all users at risk
 - c. Reducing pavement space and widths, making the urban environment less attractive and undermining public realm
2. Causing more road damage due to likely weight increases of lorries (due to greater capacity) with only a minor reduction in overall lorry miles, when local roads are already in a poor state of repair with [a huge maintenance backlog](#), including for [bridges](#). Cyclists are particularly at risk from potholes which can also cause damage to motor vehicles.
3. Causing damage to street furniture and people walking on pavements due to the outswing of the rear of the LST which is around 3m, when street furniture is only set back 0.45m and pavements are often only 2m wide, sometimes less.
4. Pose a risk on the carriageway to people cycling and driving who may not anticipate the huge outswing and are likely to be in the LST driver's blind spot.

Existing semi-trailers already pose a significant risk on the roads with [HGVs involved in many crashes](#) and responsible for many deaths and injuries to vulnerable road users.

Minimising impacts

It should be a requirement for all LSTs that they are fitted with Sat Navs designed for HGV use so that the risk of them using less suitable roads is reduced, even if not eliminated. It should also be an offence to use a sat nav for a car or light van to prevent them being swapped over.

Bridge bashing is a major issue due to lorry drivers being routed down unsuitable roads and misjudging their size. There are [5 bridge strikes every day](#), around 2,000 every year, causing delays and costs to railways in particular. Alongside this there is also damage done to rural lanes, many of which are unsuitable for anything other than occasional HGV use for access purposes. While LSTs are clearly not responsible for all these issues, they will be involved in some and their wider use would likely increase these costs, unless there is strong regulation to ensure that they are only routed on suitable roads.

Conclusion

We do not believe that the trial should be ended just yet as there is insufficient evidence to allow this. Instead, it should be continued with proper monitoring and evaluation carried out until 2027. The impact of charging HGVs the true cost of their operating on UK roads should also be examined first as it is likely to lead to far greater benefits, reducing empty running,

reducing HGV movements, as hauliers switch to rail, and reducing carbon emissions and community impact.

However, should the DfT permit wider use of 15.65m semi-trailers on a permanent basis it should be on the basis of heavier regulation as outlined in option 2. Local highways authorities must be given wider and more effective powers to restrict the use of LSTs when these are not on the Strategic Road Network (SRN) and the police given the capacity and resources to enforce these regulations.

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Transport Action Network provides free support to people and groups pressing for more sustainable transport in their area and opposing cuts to bus services, damaging road schemes and large unsustainable developments

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