

Consultation on amendments to permissible vehicle weights and dimensions, including to incentivise cleaner fuel technologies, and other associated proposals

Summary of Responses

November 2017

Introduction

On 15 November 2016, the Department for Infrastructure (the Department) conducted a public consultation on amendments to permissible vehicle weights and dimensions, including to incentivise cleaner fuel technologies, and other associated proposals which ran for 8 weeks from 15 November 2016 to 10 January 2017. The consultation sought views from stakeholders, including organisations or individuals that have an interest or directly involved in road haulage and road and passenger transport.

The consultation was published on the DfI website and a copy of the consultation can be viewed and downloaded at:

<https://www.infrastructure-ni.gov.uk/consultations/consultation-incentivising-cleaner-fuel-technologies-implementing-amendments-general-circulation>

Responses received

There were 2 responses received to this consultation from the following stakeholders:

1. Road Haulage Association (RHA)
2. Freight Transport Association (FTA)

The consultation concerns the transposition of EU Directive 2015/719 and, as Northern Ireland is part of the UK Member State, it is important to note that the Department for Transport (DfT) issued their consultation separately on this matter between 22 September and 2 November 2016, and received 27 responses. The majority of responses to the DfT consultation came from organisations either directly involved in road haulage or in alternative fuels. Some others were received from universities, private individuals or other transport sectors.

In the consultation, the Department consulted on options to allow an increase of up to a maximum of 1 tonne gross vehicle weight for certain vehicles using alternative fuel technologies and allow an extra 1.5 tonnes for all two-axle buses to operate either:

- Option 1: in international traffic only (as per the requirements of the Directive);
or
- Option 2: in both purely domestic traffic as well as international traffic.

The Department's preferred policy option is option 2.

Below is the list of questions asked in the consultation

1	Which option, 1 or 2, do you prefer? Please explain your answer.
2a	Please provide any details and any evidence on the anticipated benefits (e.g. economic, environmental, congestion, safety) that: i) Option 1 would bring ii) Option 2 would bring
2b	Please provide any details and any evidence on the anticipated costs (e.g. economic, environmental, congestion, safety) that: i) Option 1 would bring ii) Option 2 would bring
3	Please provide any evidence on the impact on fuel consumption and fleet running costs. So, for example, if a fleet switched from diesel to electric or gas vehicles. i) Option 1 ii) Option 2
4	How do you think there will be an impact on small firms? i) For option 1 ii) For option 2
5	How many haulage operators do you think will take advantage of extra weight allowances for vehicles with alternative fuel technologies? i) For option 1 ii) For option 2
6	How many bus operators do you think will take advantage of extra weight allowances for 3 axle buses with alternative fuel technologies? i) For option 1 ii) For option 2
7	How many bus operators do you think will take advantage of the extra weight allowance for 2 axle buses and use part of this extra weight allowance for alternative fuel technologies? i) For option 1 ii) For option 2
8	Article 10f of the Directive states that a shipper must give a statement of weight to the haulier who is transporting their container or swap body. Do you believe that this is best achieved as we have set out in the consultation document? If not, is there a better way of doing this?
9	Do you believe there will be any monetised costs or benefits from this new provision?
10	Will formalising the Commission's clarification of the carriage of 45 foot containers bring about any monetised costs or benefits?

11	Will there be any costs or benefits from allowing the extra 2 tonnes in weight (from 40 tonnes to 42 tonnes) for articulated vehicles comprising a two-axle tractor unit drawing a three-axle semi-trailer as part of an intermodal transport operation?
12	What percentage of operators do you believe will use these provision in question 11 for intermodal journeys?
13	Do you agree with the proposed approach of amending the Construction and Use regulations to permit use of hydrogen, natural gas and biomethane fuelled vehicles that have been type approved to relevant EU gas fuel system safety standards?
14	What are the estimated benefits for users of these vehicles in administrative time saving through not having to apply for VSOs?
15	Should the Construction and Use amendments also remove the need for VSOs for post registration converted vehicles (provided the fuel system components have been approved to EU gas fuel system safety standards and installed correctly)?

Detailed Summary of Responses

Options

Transpose the requirements of the Directive into national law to allow an increase of up to a maximum of 1 tonne gross vehicle weight for certain vehicles using alternative fuel technologies and allow an extra 1.5 tonnes for all two-axle buses to operate:

Option 1: in international traffic only.

Option 2: in both purely domestic traffic as well as international traffic.

Our preferred policy option is option 2

Q1 – Which option, 1 or 2, do you prefer? Please explain your answer.

Both respondents to the Department's consultation favoured Option 2 as the preferred option for implementation.

Respondents favoured option 2 largely because they believed this option will encourage uptake of alternatively fuelled vehicles, assist in carbon emission reduction, contribute to UK greenhouse gas emission targets, reduce air pollution and contribute to the development of new fuel technologies.

It should be noted that the majority of respondents to the DfT consultation favoured Option 2; no respondents preferred Option 1, and one stated that they welcomed both provisions.

Q2a – Please provide any details and any evidence on the anticipated benefits (e.g. economic, environmental, congestion, safety) that:

i) Option 1 would bring

ii) Option 2 would bring

Question 2a.i. received no responses. For Question 2a.ii, respondents were supportive of option 2 because this measure would allow operators to use the full payload of the vehicle and would give consistency across the board to operators internationally and domestically. It was highlighted that option one (allowing weight and dimension increases for international haulage only) would give international hauliers a competitive advantage over domestic hauliers. Therefore, in terms of parity and equity, allowing both domestic and international operators to avail of the weight and dimension increases was the preferred option.

One respondent expressed concerns over the wider costs operating a greater number of alternatively fuelled vehicles will have on the national grid. Currently

alternatively fuelled vehicles are only capable of operating at lower weights and as such could potentially cause an increase to congestion in our cities. However, respondents to the DfT consultation felt it may reduce traffic congestion because quieter engines should allow for more night deliveries.

Q2b – Please provide any details and any evidence on the anticipated costs (e.g. economic, environmental, congestion, safety) that:

i) Option 1 would bring

ii) Option 2 would bring

Question 2b.i. received no responses. For Question 2b.ii, respondents believed there would be significant general costs for this option. The costs that were proposed were related to the cost of upgrading vehicles to alternative fuels which would be passed to the consumer.

It should be noted that responses to the DfT consultation highlighted increased costs of road repair due to the additional weight of vehicles.

Q3 – Please provide any evidence on the impact on fuel consumption and fleet running costs. So, for example, if a fleet switched from diesel to electric or gas vehicles.

i) Option 1

ii) Option 2

Question 3.i. received no responses. For Question 3.ii, responses showed some estimates for monetary savings that could be achieved for operators who switch from diesel or petrol to an alternative fuel technology. These were mostly based on the fact that alternative fuels cost less than diesel or petrol. One respondent advised that fuel represents approximately 20 – 30% of total operating costs for commercial goods vehicles and that the approximate saving in using biomethane in contrast to diesel is around 30%.

Although respondents believed that operators would experience a reduction in fuel bills, they felt that there is an issue in the lack of refuelling infrastructure for alternative fuels such as biomethane in Northern Ireland.

Q4 – How do you think there will be an impact on small firms?

i) For option 1

ii) For option 2

Question 4.i. received no responses. For Question 4.ii, responses indicated that option 2 would help to advance the use of alternative fuels and low carbon technologies among small firms. Impacts given included greater flexibility for small

firms, more incentives to adopt low carbon technologies, and better infrastructure making it easier for small firms to access alternative fuel technology.

However, it was also mentioned that Government still needs to provide further support via legislation, funding and incentives to operators to adopt alternative fuels and low carbon technologies as, an extra tonne of weight alone will not be enough to kick start the market for smaller companies.

It was also noted that smaller hauliers would struggle to find the capital investment needed to fund alternatively fuelled vehicles, particularly hydrogen fuelled, therefore the positive impacts of option 2 for small firms could in fact be quite limited compared with those for larger hauliers.

Q5 – How many haulage operators do you think will take advantage of extra weight allowances for vehicles with alternative fuel technologies?

i) For option 1

ii) For option 2

Question 5.i. received no responses. For Question 5.ii., responses to the question in the consultation which concerned percentages of haulage operators expected to take advantage of the extra weight allowances found it difficult to quantify the uptake without knowing first of all the economic advantages of switching to alternative fuels in Northern Ireland which will be determined by availability of vehicles and the infrastructure to fuel them.

However, figures were provided showing that there are 1,540 Standard International operator licences, 374 Standard National licences and 3,816 Restricted Operator Licences in Northern Ireland giving a total 5,730 operators who could potentially avail of the additional weight limit.

Q6 – How many bus operators do you think will take advantage of extra weight allowances for 3 axle buses with alternative fuel technologies?

i) For option 1

ii) For option 2

Q7 – How many bus operators do you think will take advantage of the extra weight allowance for 2 axle buses and use part of this extra weight allowance for alternative fuel technologies?

i) For option 1

ii) For option 2

The questions in the consultation which concerned percentages of bus operators (of both 2 and 3 axle buses) expected to take advantage of the extra weight allowances received no responses. However the public consultation was issued to members of

the Department's Bus Forum which includes representatives from Translink, the Federation of Passenger Transport Northern Ireland (FPTNI) and Quinn's Coach Hire.

Q8 – Article 10f of the Directive states that a shipper must give a statement of weight to the haulier who is transporting their container or swap body. Do you believe that this is best achieved as we have set out in the consultation document? If not, is there a better way of doing this?

Q9 – Do you believe there will be any monetised costs or benefits from this new provision?

One respondent was supportive of the Department's proposal in relation to the shipper's statement of weight whilst the other respondent was concerned about the lack of detail provided by the Department on the proposed shipper statement of weight within the consultation.

Both respondents realised the benefits from this measure in that there would be a greater understanding and more transparent system in monitoring the weight of containers which should safeguard against the risk of overweight vehicles and the potential of vehicle downtime and fines.

Q10 – Will formalising the Commission's clarification of the carriage of 45 foot containers bring about any monetised costs or benefits?

Respondents did not highlight any costs arising from this measure. They considered that benefits would include increased flexibility in utilising fleets and that this measure would ensure legal compliance for operators.

Q11 – Will there be any costs or benefits from allowing the extra 2 tonnes in weight (from 40 tonnes to 42 tonnes) for articulated vehicles comprising a two-axle tractor unit drawing a three-axle semi-trailer as part of an intermodal transport operation?

Q12 – What percentage of operators do you believe will use these provision in question 11 for intermodal journeys?

Respondents felt that the extension of provisions to allow 42 tonnes (2+3) on intermodal journeys would benefit fleet operations. However, it was highlighted that this particular technology is currently not used widely enough in Northern Ireland to be able to answer this question. It was indicated that many hauliers here use a 3+3 combination.

One respondent felt that the percentage will be minimal as most use 3+3 combinations however the change would give greater flexibility to operators in fleet usage going forward. The other respondent deemed that the percentage of operators who use these provisions will be dependent on the cost of the technology, reliability and the supporting infrastructure across the road network.

Responses to the DfT consultation stated that the costs of allowing these vehicles to carry an extra 2 tonnes in weight, would include the cost of retraining staff, the allocation of resources to switch some goods from motor vehicles to trucks, and minimal road repair from the extra weight.

Q13 – Do you agree with the proposed approach of amending the Construction and Use regulations to permit use of hydrogen, natural gas and biomethane fuelled vehicles that have been type approved to relevant EU gas fuel system safety standards?

Q14 – What are the estimated benefits for users of these vehicles in administrative time saving through not having to apply for VSOs?

Respondents agreed that removing the VSO requirement for alternative fuels would also help to remove a barrier to uptake of greener fuels.

Q15 – Should the Construction and Use amendments also remove the need for VSOs for post registration converted vehicles (provided the fuel system components have been approved to EU gas fuel system safety standards and installed correctly)?

Respondents were supportive of this measure.

Other comments on consultation

Responses highlighted what needed to be considered to increase the take up of alternative fuels and low carbon in the freight industry:

- Lack of wider availability of Euro VI for gas HGVs from manufacturers
- Greater support for national refuelling infrastructure and vehicle grants from the Office for Low Emission Vehicles (OLEV) which was highlighted as a significant barrier for Northern Ireland.
- The duty differential for road fuel gas for a ten year period until 2024 needs to continue after Treasury's review in 2018

- Upgrading biomethane for use as a transport fuel rather than incentivising producers to inject into the grid for electricity and heating when other alternatives are available
- Recognition of Green Gas Certificates for transport carbon reporting

Responses also suggested any weight increase should be extended to diesel efficient Euro VI engines, given that these vehicles are very environmentally friendly and are far more efficient, reliable and financially viable than alternatively fuelled vehicles at this moment in time.

Department's response

The Department notes the points raised in the consultation however they fall outside the scope of the Directive which could be deemed as gold plating.

The Department also believes it should not be over prescriptive in its transposition for the proposed shipper statement of weight in order to reduce the risk of gold plating and therefore being subject to a proportionate fine from the EU Commission.

The Directive creates a requirement for shippers to provide a statement of weight to hauliers to prevent them from carrying heavier loads than which they are legally able. The purpose is to provide reassurance to hauliers that the container/swap body does not exceed maximum legal weight capacity, and to clarify legal responsibilities in the event of roadside inspection.

The Department has issued guidance on the implementation of the Directive at the link below:

<https://www.infrastructure-ni.gov.uk/publications/motor-vehicles-authorised-weight-and-construction-and-use-amendment-regulations-northern-ireland>

The Department will proceed with the transposition of EU Directive 2015/719 into domestic legislation as soon as practically possible.