

**From: Michael Payne, Cabinet Member for Highways and Transport
Barbara Cooper, Corporate Director for Growth, Environment
and Transport**

To: Environment and Transport Cabinet Committee

**Subject: Department for Transport (DfT) 48 tonne Intermodal Freight Trial
Consultation**

Classification: Unrestricted

Past Pathway of Paper: N/A

Future Pathway of Paper: N/A

Electoral Divisions: All

Summary:

The Department for Transport (DfT) recently consulted on a Heavier Intermodal Freight Trial, involving a maximum weight relaxation (from 44 tonnes to 48 tonnes) for domestic intermodal journeys on set routes to support rail freight.

This consultation provides the opportunity for Kent County Council (KCC) to build on the existing relationship it has nurtured with the DfT to ensure that any outcomes delivered by the proposed trial can benefit Kent. However, at this stage, any such proposed trial is not currently planned to be undertaken in Kent.

A draft officer response was submitted to the DfT before the deadline on 4th January 2021, which as agreed with the DfT, will be amended following consideration by this Committee and any recommendations it makes to the Cabinet Member for Highways and Transport.

The draft response outlines the existing problems Kent faces with the parking and movements of Heavy Goods Vehicles (HGVs) and recommends the rolling out of a suitable lorry control zone to properly regulate and monitor HGVs as part of the proposed trial.

The draft response also strongly opposes that local authorities should be expected to cover any of the costs of upgrading or strengthening assets for the trial, and suggests that local authorities have a guarantee of funding and/or advance funding to undertake this work.

Recommendation:

The Cabinet Committee is asked to consider and make recommendations to the Cabinet Member for Highways and Transport on the draft KCC response to the DfT Consultation on a 48 Tonne Intermodal Freight Trial.

1. Background

- 1.1 The Department for Transport (DfT) has recently consulted on a Heavier Intermodal Freight Trial, involving a maximum laden weight relaxation for 6-axle articulated lorries from 44 to 48 tonnes, for domestic intermodal journeys supporting rail freight.
- 1.2 The consultation was open from 9th November 2020 until 4th January 2021. A draft officer response was submitted before the deadline (attached as Appendix A to this report); however, as agreed with the DfT, it will be amended following consideration by this Environment and Transport Cabinet Committee and any recommendations it makes to the Cabinet Member for Highways and Transport.

1.3 This report provides a summary of the DfT Heavier Intermodal Freight Trial in Section 2, and summarises the draft Kent County Council (KCC) response in Section 3 which is attached in full as Appendix A.

2. Summary of the Heavier Intermodal Freight Trial Consultation

2.1 The standard maximum laden weight for 6-axle articulated lorries when used on public roads in Great Britain is 44 tonnes. Some organisations have identified that allowing 6-axle articulated lorries to be operated at 48 tonnes during domestic intermodal journeys would improve efficiency and support rail freight.

2.2 This could be permitted for repetitive container loads that travel along a set route. Increasing the load capacity for each lorry involved could reduce the number of lorry movements to service each train, with the operations liable to happen frequently, feeding into scheduled trains operating on one or more days a week.

2.3 The DfT has made some technical assessments and this consultation is about the possibility of a limited trial for this type of operation. The core of the proposal is for 6-axle articulated lorries run by specific operators to operate at 48 tonnes, while continuing to follow other existing rules, including maximum axle weights. These operations would:

- be restricted to specific routes
- likely be limited to a maximum journey length (proposed to be 50 miles)
- have to be part of domestic intermodal (road and rail) operation

2.4 Accommodating a trial within the existing load-bearing constraints of bridges and other infrastructure is not straightforward, and it may not be possible to include some otherwise useful routes. The design and state of the national stock of bridges and infrastructure rules out a wider consideration of allowing 48-tonne operation outside specified and authorised routes.

2.5 The DfT has conducted a preliminary technical assessment. This indicates:

- there might be significant public benefits if these operations help rail freight to a larger market share than would otherwise be the case
- that on routes where the road legs do not result in specific extra costs for relatively weak infrastructure, the quantified public benefits are likely to outweigh the costs and disadvantages

2.6 A real-world trial would provide a full and accurate picture of the costs and benefits of this proposal, along with highlighting other practical and commercial considerations. These results would allow a fully informed decision to be made around whether to roll the trial out further.

2.7 The proposal being consulted on is for a trial, lasting up to 4 years, of a number of routes, which will be cleared for specified operators to run 6-axle articulated lorries at a maximum laden weight of 48 tonnes, within all other applicable current regulations about weights and dimensions (including for

maximum axle weights). There would be a maximum length for any cleared route, proposed to be around 50 miles.

- 2.8 The operations would need to be part of an intermodal journey with a rail leg, both ends of which have to be within Great Britain, or one end of the journey in Great Britain and the freight travelling by rail through the Channel Tunnel (excluding the Euroshuttle, i.e. freight trains through the Channel Tunnel and not freight arriving via road to use the cross-channel rail shuttle service). The proposal would be suitable for road legs covered frequently between points of production or distribution and railheads.
- 2.9 The DfT states that, if the trial helps secure existing intermodal freight traffic or enables more, it might result in net public benefits, including those due to the reduction of road congestion; carbon emissions; pollution; noise; road safety risks; and those related to the rail legs of journeys.
- 2.10 The road legs of journeys would have a number of positive and negative effects, compared with the way they are delivered using the existing maximum laden weight of 44 tonnes. The trial would operate only on routes where infrastructure could accommodate the 48-tonne load. Even here, the extra loading may accelerate the need for significant maintenance work on specific structures or require specific assessments.
- 2.11 Besides costs related to specific structural assessments and strengthening, the road legs would be associated with some increases in roads and structural maintenance costs. Some costs are directly proportionate to vehicle weight; others vary in proportion to the power of 4 of vehicle weight.
- 2.12 The DfT assesses that these extra costs might be outweighed by public benefits arising from fewer lorry movements (including benefits related to congestion, carbon emissions, pollution and safety). Controls would be designed to support safe operation of the heavier lorries.
- 2.13 The DfT proposes to seek local highways authorities' views about proposed trial routes involving roads for which they are responsible. This would also check if there are any specific issues connected with bridges or infrastructure that would rule out certain routes or be associated with specific costs connected to structural assessments or strengthening.
- 2.14 The DfT is considering how costs to local authorities can be mitigated and minimised, including securing a contribution from a commitment from participating operators, and using existing DfT budgets to cover excess. It is suggested that participating operators could be asked to contribute up to 50% of local authority costs related to structural assessments or strengthening required as a result of the trial operations.
- 2.15 The DfT also proposes to allow local highway authorities to block routes being included on the trial if they result in excessive additional costs related to bridges and infrastructure being incurred during the trial. A threshold of such costs is likely to be between approximately £0.15 million and £0.5 million. These costs would need to be related to specific structural assessments and planned strengthening required by the trial, which would not be needed

otherwise. General maintenance costs due to increased wear due to heavier vehicles would not be included. Costs would need to be checked and agreed by the DfT before they result in a route not going ahead.

- 2.16 At this stage, the routes for the proposed trial have not been determined and there are not currently any planned routes in Kent. The consultation seeks views and evidence about whether in principle to have a trial, its likely effects and processes required to implement such a trial.
- 2.17 Commercial road transport operators interested in taking part in such a trial are invited to register their interest and provide information on some more detailed technical questions in the impact assessment. Bridge owners are invited to consider implications on their infrastructure and operation.
- 2.18 Secondary legislation is likely to be needed to allow the trial to take place. The consultation will inform whether such legislation is put forward and information gathered on potential operators interested in taking part in the trial.

3. Summary of the Draft KCC Response

- 3.1 The full draft response is provided as Appendix A and consists of a cover letter and a completed response form.
- 3.2 The cover letter thanks Government for recently granting KCC temporary enforcement powers to prevent Heavy Goods Vehicles (HGVs) parking inappropriately as part of the traffic management measures needed as a result of the UK's new relationship with the EU; and reiterates a request for similar powers over moving HGVs to prevent them from using unsuitable routes in Kent. It concludes by expressing a desire to build on the existing relationship to ensure that any outcomes delivered by the trial can benefit Kent.
- 3.3 The response form provides draft KCC officer responses to the eight main questions of the consultation. The response outlines the existing problems Kent faces with the parking and movements of HGVs and recommends the rolling out of a suitable lorry control zone to properly regulate and monitor HGVs as part of the proposed trial.
- 3.4 It makes the point that reducing HGVs on certain routes creates more capacity for future increases and highlights the maintenance disbenefit for road pavements and structures.
- 3.5 It acknowledges that the principles of the trial support the objective of delivering modal shift of freight from road to rail, in line with several KCC strategies, including the Freight Action Plan (2017), Kent Energy and Low Emissions Strategy (2020) and draft Rail Strategy for Kent (2021).
- 3.6 It expresses a preference that the trial is reduced from four to two years' duration, with a one-year review, provided that useful data could be obtained about both vehicle movements and highway asset condition.
- 3.7 The response strongly opposes that local authorities should be expected to cover any of the costs of upgrading or strengthening assets for the trial, and suggests that local authorities have a guarantee of funding and/or advance funding to undertake this work.

4. Conclusions

- 4.1 This consultation provides the opportunity for KCC to build on the existing relationship it has nurtured with the DfT to ensure that any outcomes delivered by the proposed trial can benefit Kent.
- 4.2 The KCC draft response makes a number of suggestions on the trial methodology and funding that would assist Kent in resolving its current issues with the parking and movements of HGVs.

5. Financial Implications

- 5.1 There are no financial implications to KCC in responding to this consultation, as the DfT proposes to allow local highway authorities to block routes being included on the trial if they result in excessive additional costs related to bridges and infrastructure being incurred during the trial.

6. Legal Implications

- 6.1 There are no legal implications to KCC in responding to this consultation.

7. Equalities Implications

- 7.1 There is no Equality Impact Assessment (EqIA) provided by the Government as part of the policy proposal.
- 7.2 It is therefore assumed that the Government will complete an EqIA on each proposed trial route.

8. General Data Protection Regulations (GDPR) Considerations

- 8.1 A Data Protection Impact Assessment is not required as this consultation response does not require the processing of personal data.

9. Other Corporate Implications

- 9.1 There are no other corporate implications to KCC in responding to this consultation.

10. Governance

- 10.1 The consultation response will be submitted by the Director of Highways, Transportation & Waste under the Officer Scheme of Delegations following prior consultation with the Cabinet Member for Highways & Transport.

11 Recommendation:

- 11.1 The Cabinet Committee is asked to consider and make recommendations to the Cabinet Member for Highways and Transport on the draft KCC response to the DfT Consultation on a 48 Tonne Intermodal Freight Trial.

12 Background Documents

12.1 DfT Heavier Intermodal Freight Trial Consultation Document:

<https://www.gov.uk/government/consultations/heavier-intermodal-freight-trial/48-tonne-intermodal-freight-trial-consultation-document>

12.2 Draft KCC Officer Response to DfT Heavier Intermodal Freight Trial Consultation: Appendix A.

13 Contact details

Report Author: Joseph Ratcliffe, Transport Strategy Manager 03000 413445 joseph.ratcliffe@kent.gov.uk		Relevant Director: Simon Jones, Director, Highways, Transportation and Waste 03000 411683 simon.jones@kent.gov.uk
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