



The Chartered
Institute of Logistics
and Transport

‘Heavier Intermodal Freight Trial’: A CILT Response to the DfT Consultation

January 2021

Introduction

The Chartered Institute of Logistics and Transport (CILT) is a professional institution embracing all transport modes whose members are engaged in the provision of transport services for both passengers and freight, the management of logistics and the supply chain, transport planning, government and administration. Our principal concern is that transport policies and procedures should be effective and efficient, based on objective analysis of the issues and practical experience, and that good practice should be widely disseminated and adopted. The Institute has a number of specialist forums, a nationwide structure of locally based groups and a Public Policies Committee which considers the broad canvass of transport policy.

CILT is pleased to respond to this consultation. The matter has been discussed at its Rail Freight Forum and Freight & Logistics Policy Group, following which a specific meeting was held involving representatives from both bodies and other relevant participants. This response reflects the conclusions of that meeting

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 principle of a trial on the basis set out in the consultation document and agree that 50 miles is a reasonable range.

We consider that specific monitoring and detailed reporting requirements are an essential aspect of the trial, to ensure it is running safely and to allow for post-trial evaluation. By their very nature, the proposed 48t intermodal operations must be assessed, implemented and evaluated in a route, operator and possibly vehicle and driver specific manner. It is thus essential that detailed monitoring, audit and review of 48t operations take place, using GPS tracking, ANPR cameras and dynamic weighbridges.

With the entirely justified concerns about bridge capacity and condition, highlighted again very recently, compliance is vital and only highly reputable road operators with the necessary monitoring and management systems, vehicle fleets and driver training programmes should be permitted to operate at 48t. We believe that only companies with an OCRS Green rating should be allowed to participate. The consequences of non-compliance have very serious public safety implications and multiple daily bridge bashes demonstrate that operator compliance is often poor and rule violation widespread.

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 cannot identify any domestic waterborne intermodal flows and, given the nature of coastal shipping and inland waterway transport, do not consider that any are likely. That said, we would have no problem with such waterborne domestic intermodal operations being included if the opportunity arose. It should not apply to conventional shipping cargoes.

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?

As indicated above, we believe 50 miles is a reasonable range. A significant proportion of key locations are much closer than this to intermodal terminals, but there are a number of important production and distribution centres somewhat further afield and the proposed range would allow these locations to be included in the trial.

We consider that extending the range beyond 50 miles would create serious problems with assessment of routes and enforcement. It would also expose a greater number of bridges to the additional load of 48t vehicles, increasing highway maintenance, repair and renewal costs substantially. Because of this, we agree completely that 48t for intermodal moves should be confined to a limited number of relatively high-volume regular routes.

Question 4

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

We agree that 4 years with a possible 2-year extension is reasonable period for the trial.

Question 5

Does the [impact assessment](#) consider the main likely effects of a trial sufficiently? Are there any additional effects or impacts that you think have not been reflected?

The key aspect of this trial in our view is removal of the payload penalty that intermodal movements currently suffer and the creation of a level playing field with all-road moves. The equalisation of payload at c.28.5 tonnes is the key feature, not 48t glw *per se*, and is fully consistent with HMG policy imperatives on modal switch and decarbonisation. The length of road trunk hauls avoided by modal switch to intermodal rail means that the reduction in carbon emissions and improvement in air quality would be substantial.

As noted in the Impact Assessment, due to the high weights and distances involved, road trunking is a very hard mode to decarbonise and we consider that equalisation of payload for domestic intermodal moves could materially assist in decarbonising long haul freight in the UK. We also agree that it would result in net public benefits, including the reduction of road congestion, pollution, noise and road safety risks.

The main criteria for judging success or failure of the trial are, thus, what increase of domestic intermodal has been generated by 48t and how much carbon has been saved as a result. It is also essential to establish what costs have been incurred, most obviously in respect of highway bridge costs but also more generally. Other data that needs to be captured and evaluated includes the number of rule violations that occurred during the trial, with specific explanations from the operator concerned about why their control systems failed. We consider it essential that all such data should be published periodically during the course of the trial (probably quarterly) as well as at/towards the end of the trial.

Such are the potential safety risks from bridge failure that we believe any infringement without clear and justified explanation should result in enforcement action and loss of licence if the offence was repeated. We believe that 48t drivers should be specially trained and monitored and that granting of licences should be confined to operators with Green OCRS compliance.

We consider the route planning and application process is akin to, and should be part of, the well-established Special Types General Order (STGO) process for exceptional/indivisible loads. This would have the benefit of using an existing framework and approval techniques. We envisage a new STGO/R category for Rail moves, with vehicles suitably badged.

Such local 48t operations would be well-suited to trials of battery HGVs and, in due course, this could produce a near zero-carbon trunking operation from origin to destination. We see benefits in making 48t conditional upon using battery (or other) zero carbon vehicles in due course and, for the moment, consider that it should apply to vehicles meeting the latest environmental standards and/or using low carbon fuels such as biodiesel.

We believe that using increasingly scarce HGV drivers on local work from railheads, on which a driver can often make 3 or 4 trips a day, is a far more productive use of a scarce asset than sitting behind the wheel on a single 8/10-hour trunk haul. Increasing the amount of freight moved by rail intermodal would thus help address the HGV driver shortage and productivity. It would also address the understandable lifestyle resistance from potential new entrants to doing 60-70 hours a week trunking and sleeping in cabs. Applicants now want to do 8/9 hours and get home for the night - local work from intermodal terminals would allow them to do this.

It is also clear from evidence presented by colleagues in road haulage that intermodal, with trunk haulage by rail, is a more viable business model than long distance road trunking. Several report that the haulage industry is 'on its knees' and facing fundamental challenges with trunking, which makes little or no money. Without significant changes, UK plc could see a serious loss of logistics capability due to inadequate margins and lack of HGV drivers. We therefore see the encouragement of intermodal rail as a critical objective for the economy.

Brexit and Deep Sea port congestion demonstrate clearly the impact of disruption to supply chains in key sectors of the economy and it is not hard to visualise what the impact of insufficient domestic trunk haulage capacity could be.

Much stronger environmental emphasis amongst the public and policy makers is now very evident and is becoming considerably more important in the commercial world. There is growing customer interest in their carbon footprint, albeit cost is still paramount with many companies, particularly in difficult economic times with Covid and Brexit. Mandatory carbon reporting from 2023 and TCFD will give added weight to the corporate imperative to reduce carbon footprints and using low/zero carbon modes of transport within the supply chain. We suggest that intermodal terminals and associated road moves could be considered 'carbon critical infrastructure'.

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?

In the very limited time available to respond on this major issue (effectively just 6 weeks allowing for the Christmas/New Year break) it has not been possible to study the Impact Assessment in any detail. We are happy to do so after 4th January if this would be helpful.

We are in broad agreement with proposals for the trial, although we see no need for a broad geographic spread across the UK – the market should decide where 48t for domestic intermodal moves would be most appropriate and there should be no attempt to control or influence where the trials occur.

We see no compelling need for a counterfactual group of operators who continue with the current maximum weight limits. The operators taking part in the trial can provide data on what would have occurred without the 48t capability and this could be independently audited.

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 agree that a local authority should be able to veto a trial route if it can demonstrate this would incur excessive costs related to assessment and strengthening of specific structures. The right of veto should, however, be confined to this issue and any other issues should be addressed through their existing powers. HMG, TS or WG should have the option to provide additional funding to a local authority to enable it to avoid incurring excessive costs. If this was exercised, we believe it should remove the right of veto for that application.

We are not expert in the field of local authority finances, but suggest that the above provisions might apply above £50k for application costs and £100k for physical work to the highway.

We consider that a small contribution to evaluation costs from participating operators – say £10k per route – is not unreasonable, but that operators should not be required to contribute to the cost of physical work to the highway. We consider it unlikely that many, if any, applications will be made if a higher level of contribution was required.

Do you have any further comments?

We remain deeply concerned about the potential for ‘scope creep’ of 48t to all HGVs, as occurred in 1993 with 44t, which will almost certainly be the subject of lobbying from some quarters. It is crystal clear to us that this would be strongly contrary to the policy imperatives of decarbonisation and modal shift, making the legal obligation of Net Zero 2050 very much harder to achieve.

We believe it is therefore imperative that Ministers give clear and unequivocal assurances that the trial of 48t for short distance, tightly controlled, intermodal moves will under no circumstances lead to the adoption of 48t for general haulage. Without this assurance, we believe that there would rightly be extremely vocal opposition to the trial from the public and MPs, which could scupper the trial.

Overall, we believe that the key to a successful trial of 48t vehicles for intermodal use is dependent on visibility of operator proposals, the route assessment process, additional highway costs, control measures and compliance, plus – critically - its impact on rail freight growth, modal switch and carbon emissions. Clear numerical data to evidence the results is vital. Such data is also essential to inform the policy debate around decarbonisation and modal shift, together with associated issues such as the cost of bridge strengthening and remedial highway work.

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