



## **Unite submission to Department for Transport Consultation on the Possibility of Allowing an Increase in the Length of Articulated Lorries**

### **1. Introduction**

- 1.1 This submission is by Unite the Union. Unite is the UK's largest trade union with over 1.5 million members across the private and public sectors. The union's members work in a range of industries including manufacturing, financial services, print, media, construction, local government, food, agriculture, education, health, not for profit and the transport sector.
- 1.2 Unite the Union's current membership in our Road Transport Commercial, Logistics and Retail Distribution section, is 66,000. Unite is the largest trade union representing drivers, engineers, administrative staff, inspectors and managers employed in the UK transport industry, with the vast majority of organised workers in the sector in Unite.
- 1.3 Unite has obtained the views of our members through our lay member committees at national and regional level. Therefore Unite is in a unique position to submit a response to the Department for Transport consultation on the 'Possibility of Allowing an Increase in the Length of Articulated Lorries'.
- 1.4 Unite has chosen not to respond to this consultation via the suggested format because it was felt that this would not allow the opportunity to express our opposition to the proposal based within the constraints of the questions asked which seem to be more about implementation of the proposal rather than an assessment of its actual need.

## 2. Need for extra capacity has not been proven

2.1 Unite is somewhat perplexed that the Government is even considering this proposal to allow an increase in the length of articulated lorries because the need for extra capacity has not been proven.

2.2 The Department for Transport's (DfT) own statistics show that at best capacity is stagnant with the latest statistics demonstrating that the percentage of empty running articulated lorries was 27.6% in 2009, which has hardly moved in 10 years since 1999 when it was 26.8%.<sup>1</sup>

Road Freight Statistics 2009

Table 1.12: Percentage empty running and lading factors<sup>1</sup> by vehicle type, annual 1999-2009

Vehicle type and size (gvw tonnes)	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009
<b>Percentage empty running</b>											
<b>Rigid vehicles</b>											
Over 3.5 to 7.5	25.5	24.3	25.1	24.3	26.3	25.0	27.5	25.4	28.4	26.0	26.9
Over 7.5 to 17	24.3	25.2	24.2	24.9	24.2	25.7	23.6	24.8	24.0	26.5	25.0
Over 17 to 25	31.3	28.0	26.5	26.0	25.4	25.6 <sup>R</sup>	25.0	23.9	23.3	26.6	24.7
Over 25	37.9	37.7	36.7	37.5	35.7	35.3 <sup>R</sup>	35.3	34.5	34.4	35.2	36.4
<b>All rigids</b>	<b>27.5</b>	<b>27.3</b>	<b>27.2</b>	<b>27.6</b>	<b>27.9</b>	<b>27.7</b>	<b>28.4</b>	<b>27.5</b>	<b>28.4</b>	<b>29.0</b>	<b>28.9</b>
<b>Articulated vehicles</b>											
Over 3.5 to 33	24.1	22.3	20.1	22.3	21.0	21.0	23.6	22.9	22.8	24.9	24.0
Over 33	27.5	27.5	26.7	25.9	25.9	26.5	26.8	26.5	26.7	29.1	28.0
<b>All artics</b>	<b>26.8</b>	<b>26.4</b>	<b>25.5</b>	<b>25.3</b>	<b>25.2</b>	<b>25.8</b>	<b>26.5</b>	<b>26.1</b>	<b>26.4</b>	<b>28.7</b>	<b>27.6</b>
<b>All vehicles</b>	<b>27.2</b>	<b>26.9</b>	<b>26.4</b>	<b>26.5</b>	<b>26.5</b>	<b>26.8</b>	<b>27.4</b>	<b>26.8</b>	<b>27.4</b>	<b>28.9</b>	<b>28.3</b>
<b>Lading factor</b>											
<b>Rigid vehicles</b>											
Over 3.5 to 7.5	0.44	0.45	0.44	0.43	0.42	0.41	0.41	0.42	0.40	0.41	0.43
Over 7.5 to 17	0.45	0.44	0.41	0.42	0.40	0.39 <sup>R</sup>	0.39	0.38	0.37	0.41	0.36
Over 17 to 25	0.58	0.51	0.51	0.48	0.46	0.46	0.46	0.45	0.45	0.44	0.42
Over 25	0.71	0.70	0.67	0.68	0.65	0.66	0.64	0.64	0.64	0.60	0.61
<b>All rigids</b>	<b>0.54</b>	<b>0.54</b>	<b>0.52</b>	<b>0.53</b>	<b>0.52</b>	<b>0.52</b>	<b>0.53</b>	<b>0.53</b>	<b>0.53</b>	<b>0.52</b>	<b>0.50</b>
<b>Articulated vehicles</b>											
Over 3.5 to 33	0.47	0.47	0.46	0.45	0.43	0.41	0.43	0.45	0.43	0.45	0.45
Over 33	0.65	0.66	0.64	0.62	0.60	0.60	0.59	0.59	0.60	0.61	0.61
<b>All artics</b>	<b>0.62</b>	<b>0.63</b>	<b>0.62</b>	<b>0.60</b>	<b>0.58</b>	<b>0.59</b>	<b>0.58</b>	<b>0.58</b>	<b>0.59</b>	<b>0.60</b>	<b>0.60</b>
<b>All vehicles</b>	<b>0.60</b>	<b>0.60</b>	<b>0.59</b>	<b>0.58</b>	<b>0.57</b>	<b>0.57</b>	<b>0.57</b>	<b>0.56</b>	<b>0.57</b>	<b>0.58</b>	<b>0.57</b>

Source: DfT

<sup>1</sup> [www.dft.gov.uk/adobepdf/162469/221412/221522/222944/661202/rfs2009.pdf](http://www.dft.gov.uk/adobepdf/162469/221412/221522/222944/661202/rfs2009.pdf)

2.3 That means:

- Over one in four articulated lorries were driving around empty in 2009;
- Articulated lorries ran empty for 2,548 million kilometres in 2009;<sup>2</sup>
- Articulated lorries ran on average 3.8km empty for every 10km that they ran loaded in 2009.

2.4 In terms of a sector performance breakdown of the economy the latest statistics clearly show that clearly some sectors are better at using spare capacity than others. The ‘transport, storage and communication’ sector with 22.5% empty running time is performing considerably better than the ‘education, public admin & defence, extra-territorial organisation’ sector, with 50.7% empty running time.<sup>3</sup> This is no surprise bearing in mind the different nature of cargo in terms of shapes, sizes and weights from one sector to another.

Table A1: Empty running by business type, 2009

Business Type	Total Vehicle Kms (Millions)	Percentage empty running		
		Vehicle type		
		Rigids	Artics	All vehicles
<b>Hire or Reward</b>	<b>8,953</b>	<b>30.2</b>	<b>27.7</b>	<b>28.6</b>
<b>Own account</b>	<b>9,894</b>	<b>28.2</b>	<b>27.5</b>	<b>28.0</b>
Agriculture, forestry and fishing	229	38.9	38.0	38.5
Energy and water supply	53	17.1	46.5	19.5
Manufacture, mining and quarrying	1,671	32.1	33.1	32.4
Construction	662	40.7	40.8	40.7
Wholesale & retail trade, repairs and hotels	4,955	24.6	25.4	24.9
Transport, storage and communication	1,026	24.7	22.5	23.5
Banking, finance and insurance, business services and leasing	299	31.3	36.6	31.8
Education, public admin & defence, extra-territorial organisations	69	25.4	50.7	30.4
Health, social work and other community services	930	26.5	43.9	28.6
<b>All business types</b>	<b>18,846</b>	<b>28.9</b>	<b>27.6</b>	<b>28.3</b>

Source: Continuing Survey of Road Goods Transport, DfT

Source: DfT

<sup>2</sup> [www.dft.gov.uk/excel/173025/221412/221522/222944/rfs2009section1.xls](http://www.dft.gov.uk/excel/173025/221412/221522/222944/rfs2009section1.xls)

<sup>3</sup> [www.dft.gov.uk/excel/173025/221412/221522/222944/rfs2009section1.xls](http://www.dft.gov.uk/excel/173025/221412/221522/222944/rfs2009section1.xls)

- 2.5 However, even the best performing 'transport, storage and communication' sector, which had just less than one in four articulated lorries driving around empty in 2009, cannot make a justifiable argument about a need for extra capacity.
- 2.6 Clearly the need for extra capacity has not been proven and if there was a real need for extra capacity then Unite believes that improving the efficiency of existing sized HGVs instead of increasing lorry lengths would be the appropriate course of action.

### **3. Environment**

- 3.1 The UK is committed in statute to an 80% reduction in carbon emissions by 2050, and reductions are therefore necessary across all sectors. Government data shows that transport represents around 23% of UK domestic CO2 emissions and, within that, freight transport contributes just over 30%, which comes almost entirely from road freight.<sup>4</sup>
- 3.2 Unite, as a member of 'Freight on Rail', is therefore disappointed that the Government is evaluating longer HGV trailers, with up to a 2.05 metre (7 feet) increase being considered, as any relative shift in favour of road transport runs contrary to the development of a low carbon economy.
- 3.3 While road and rail complement each other, larger trunk movements of freight can be transported more sustainably by rail than in larger lorries. Rail freight produces 70% less CO2 emissions than the equivalent road journey.<sup>5</sup> In addition, longer trucks will not only undermine rail freight but water freight, which is also more sustainable.
- 3.4 The DfT's own research says rail freight growth would be 262% in 2025 instead of 732% without longer trailers, with rail losing 9.2 million tonnes to

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<sup>4</sup> [www.transportbusiness.net/content/view/386/3/](http://www.transportbusiness.net/content/view/386/3/)

<sup>5</sup> [www.rfg.org.uk/files/rc90910paper8environment.pdf](http://www.rfg.org.uk/files/rc90910paper8environment.pdf)

road.<sup>6</sup> That 9.2 million tonnes would create an extra 6.4 million tonnes of CO2 emissions based on the fact that rail freight produces 70% less CO2 emissions than the equivalent road journey.

- 3.5 The claimed environmental benefits of longer trailers are based on achieving very high levels of load utilisation, which are far in excess of what the haulage sector is capable of. Therefore, at the current lower levels of utilisation, the environmental performance of longer trailers would be worse as the vehicles will not only be heavier but will use more fuel.
- 3.6 There is also a practical point here that can not be missed in an environmental context and that is the fact that statistics show that hauliers tend to buy the largest vehicle permitted, with 70% of UK registered HGVs at the top limit and use it for large and small loads, irrespective of the impact on efficiency and consolidation.<sup>7</sup>

#### **4. Health & Safety**

- 4.1 Existing HGVs are over 3 times more likely to be involved in fatal accidents than cars on major roads due to a combination of size, lack of proper enforcement of drivers' hours, vehicle overloading and differing foreign operating standards.<sup>8</sup> Therefore Unite believes that any increase in HGV trailers length will make the dangers even greater and the chances of accidents occurring even more likely.
- 4.2 The London 'bendy bus' is being phased out at considerable public expense due to road safety concerns so it seems a perverse decision to increase lorry lengths against this backdrop.<sup>9</sup>

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<sup>6</sup> [www.dft.gov.uk/consultations/open/2011-06/consultationdocument.doc](http://www.dft.gov.uk/consultations/open/2011-06/consultationdocument.doc)

<sup>7</sup> MTRU report Nov 2010 Figure 3 P6 Source TSGB 2009

<sup>8</sup> Road Statistics 2008, Tables 3.2 and 3.6, Road Freight Statistics 2008 Section 5, both UK Department for Transport)

<sup>9</sup> Bendy buses at 18 metres long are a similar length to the new proposed HGV length, caused more than twice as many injuries as other buses. Source Evening Standard June 7<sup>th</sup> 2007

- 4.3 Unite's members have told us that the proposed increases in length to articulated HGVs would cause dangerous tail swing, which is backed up by the DfT's own research.<sup>10</sup> Consequently, Unite is puzzled as to why the Government has opened this consultation based on a notion that new technology can be developed to improve steering to reduce tail swing, with no proof to substantiate this.
- 4.4 The UK road structure was never built for current HGV dimensions. For example, many roads such as the A41 and A5 have numerous roundabouts and bridges making it impossible for HGVs to currently stay safely within their allotted road space never mind if this proposal went through.
- 4.5 HGVs are frequently forced to leave motorways when accidents happen and are diverted regularly on to "A" roads that were not designed for HGVs. Just recently, for 2 days in April, a significant section of the M1 was closed in both directions due to a nearby fire at a scrapyard in Mill Hill.<sup>11</sup>
- 4.6 Larger HGVs are used in Australia where there are barren straight roads for hundreds of miles without any roundabouts or bridges. However, this is not the case in the UK and a closer look at the safety record of HGVs in Australia makes for uncomfortable reading.
- 4.7 In Australia fatal crashes involving articulated trucks increased by 15% compared with the corresponding period one year earlier.<sup>12</sup> In total, during the 12 months to the end of June 2010, 234 people died from 191 crashes involving heavy trucks. This included 160 deaths from 130 crashes

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<sup>10</sup> [www.dft.gov.uk/consultations/open/2011-06/consultationdocument.doc](http://www.dft.gov.uk/consultations/open/2011-06/consultationdocument.doc)

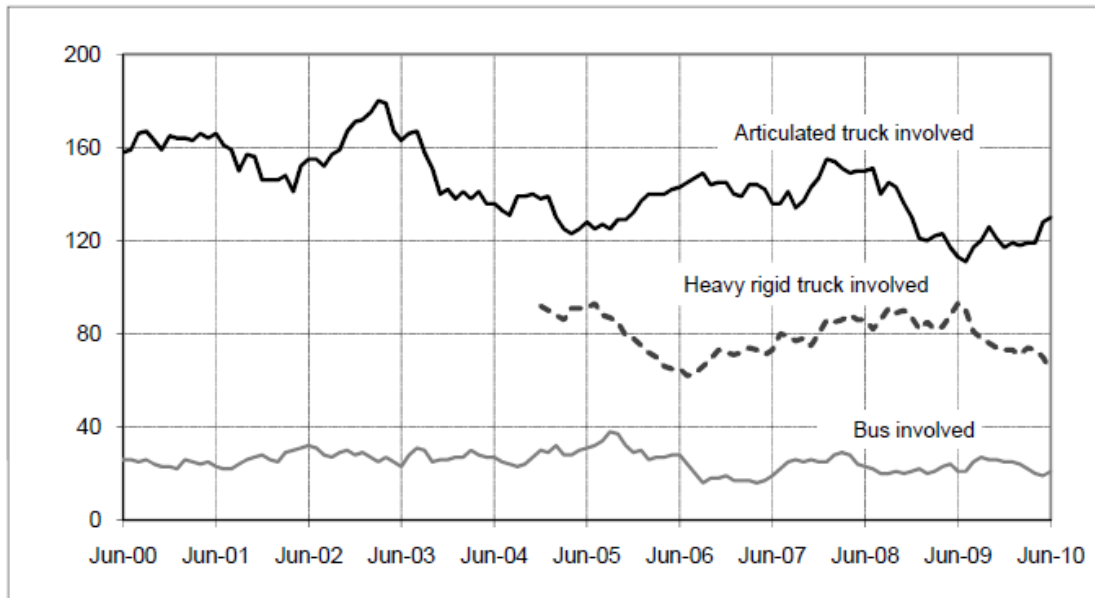
<sup>11</sup> [www.bbc.co.uk/news/uk-england-london-13107189](http://www.bbc.co.uk/news/uk-england-london-13107189)

<sup>12</sup> [www.bitre.gov.au/publications/88/Files/FHVC\\_Aust\\_June2010.pdf](http://www.bitre.gov.au/publications/88/Files/FHVC_Aust_June2010.pdf)

involving articulated trucks and 79 deaths from 64 crashes involving heavy rigid trucks.

**Fatal crashes involving heavy vehicles, Australia — moving annual total**

(Each point shows the number of fatal crashes in the preceding 12 months)



a Data unavailable prior to 2004.

**Source:** Australian Government Department of Infrastructure & Transport

4.8 Another important health and safety consideration is the potential for extended HGVs involved in accidents to cause greater destruction particularly if transporting larger amounts of dangerous goods.

## **5. Cost**

5.1 Additional costs would be incurred for access to loading, delivery points with limited space and refuelling, which are simply not built for longer trailers.

5.2 Another potential drawback of a move to longer combinations is that standard 13.6m trailers could become obsolete overnight, especially for high-volume work.

- 5.3 The idea of forcing hauliers to upgrade may not appeal to anyone other than the larger operators like Wincanton who have been actively promoting this.
- 5.4 Therefore Unite believes that any new longer HGV would become the default vehicle, which will result in the premature loss of value of existing models undermining the second hand market. This could be damaging to medium and smaller operators who will find it even harder to compete with the big operators, hence the reason why the road haulage industry remains divided on the merits of longer trailers.

## **6. Shouldn't drivers have some of this proposed extra room in their cabs?**

- 6.1 Clearly Unite is opposed to any extension, and poses the following question: "Shouldn't drivers have some of this proposed extra room in their cabs?" (This should not be seen as a form of endorsement for extending HGVs.)
- 6.2 If, despite Unite's policy and warnings, HGVs are extended, then Unite would campaign on behalf of our 66,000 members in the road haulage industry to receive some of this additional room in their cabs.
- 6.3 Drivers need to get adequate rest between journeys and when the necessary resting facilities in the shape of specialist designated truckstops are not readily available then drivers have no option but to rest in their sleeper cabs.
- 6.4 Sleeper cabs are basically steel boxes measuring 2.5 x 2.3 x 2m. If extensions are made to HGVs then Unite believes that some of that extra room should be dedicated to improve the dimensions of sleeper cabs.
- 6.5 Ultimately, Unite believes that specialist designated truckstops are the only real way to provide adequate rest that drivers need and that HGVs should not be extended.

## **7. Conclusion**

- 7.1 Unite does not think that there should be any additional length or weight for that matter allowed to HGVs for the reasons outlined above.
- 7.2 Unite believes that the Government should look at incentives to improve the efficiency of existing sized HGVs, instead of increasing lorry lengths. In a five year period up to 2009, the German Maut Lorry Road User Charging System has resulted in empty running being reduced by 11% to below 20% and an increase in loaded runs of 2.1% and in rail freight of 7%.<sup>13</sup>
- 7.3 Unite believes that the chronic lack of quality truckstops available for professional truck drivers, our members across the UK and Ireland, is a far more valid area of work for the DfT and the Highways Agency to look at. Truckstops are vital rest areas for lorry drivers and should help ensure safety for all road users. However, the current lack of truck stocks is failing to provide this.
- 7.4 That is why Unite is currently working in conjunction with Storage & Parking Solutions and Warrington Business School on a new model truckstop that would set the standard for the industry and we would like to meet with the Department for Transport (DfT) and the Highways Agency to explain in greater detail our vision for the future of truckstops.

Graham Stevenson & Paul Davies

26<sup>th</sup> May 2011

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<sup>13</sup> [www.freightonrail.org.uk/HotTopicsOpposeLongerLorries.htm](http://www.freightonrail.org.uk/HotTopicsOpposeLongerLorries.htm)