DfT consultation on reform of Traffic Regulation Orders

April 2022

About Logistics UK

Logistics UK is one of Britain's largest business groups and the only one providing a voice for the entirety of the UK's logistics sector. Our role, on behalf of over 18,000 members, is to enhance the safety, efficiency and sustainability of freight movement throughout the supply chain, across all transport modes. Logistics UK members operate over 200,000 goods vehicles - almost half the UK fleet - and some one million liveried vans. In addition, they consign over 90 per cent of the freight moved by rail and over 70 per cent of sea and air freight.

We seek to ensure that our industry can continue to supply businesses and consumers with the goods they require every day whilst reducing any social impacts – including carbon dioxide emissions and air pollution. The logistics industry wishes to play a positive role in helping reduce emissions.

Central to Logistics UK's democratic structure, the policy positions adopted by Logistics UK are determined by the members of its Councils. Over 300 managers and leaders from across road freight attend Logistics UK's Freight Councils throughout the UK every quarter. These Policy Councils meet in 13 locations across the UK. Nominated members are then able to participate in the UK-level Road Council where our policy positions on road issues are ratified. There are also Air, Rail and Water Councils that all members can join, as well as Shippers Council for logistics customers and a Strategic Council to address long-term issues. A General Meeting involving all modes and Councils can be called if needed.

Data publication requirement

17. Do you think we should amend the Road Traffic Regulation 1984 to require traffic authorities to share all data from their TROs to a single, centrally government owned digital data publication platform? Yes

18. Why? Publishing open transport data, particularly for temporary or experimental TROs would enable information about road closures or new restrictions to feed into sat-navs and routing and scheduling software far quicker. The rollout of schemes such as Low Traffic Neighbourhoods and School Streets over the last two years has been problematic for logistics companies as systems used by them and their drivers have often not been updated to take account of new restrictions which tend to be introduced at short notice. This has led to compliance challenges as alternatives routes are often unclear, when the only information available to the driver is road signage.

Notice of making

22. Do you think we should remove the regulatory requirement to publish a "Notice of Making" for temporary TROs, unless different to the "Notice of Intent"? Not sure

23. Why? The vast majority of temporary TROs are for short-term road closures for roadworks. However, during the Covid-19 pandemic, they were also used to close roads and widen pavements to allow for social-distancing, sometimes for significant periods of time. Whilst Logistics UK, fully understands the rationale behind these temporary changes, they did in some cases cause access challenges for deliveries and servicing activity. There needs to be assurances that Traffic Authorities enable and encourage engagement with affected stakeholders and will be flexible to making changes to the temporary TROs where necessary. However, we do in principle understand and support the rationale behind removing unnecessary stages of bureaucracy from the temporary TRO process.

TROs posted or emailed

24. Do you agree that we should amend regulations to allow copies of TROs to be emailed or posted to individuals, as well as being made available at an authority's office? Yes

25. Why? As a statutory consultee, Logistics UK receives most TROs via email. This is preferable to post as it is a cheaper and quicker way to notify us and reduces the unnecessary environmental impact of printing. However, where our members are affected by a proposed TRO, it may be head office, rather than the local site that may wish to respond. Or it may be a supplier delivering to a customer. In both cases, physically visiting a Traffic Authority's office is likely to be impractical, therefore, to allow individuals and businesses to request TROs be sent to them directly would be appropriate.

TRO correspondence

26. Do you agree that we should amend regulations to allow correspondence, including consultation responses or objections to proposed TROs, to be sent:

- **via email?** Yes
- **through apps?** Yes
- **via websites?** Yes

Why? Most TROs we currently receive are via email, when we do respond, we do so by email. However, also allowing responses to be submitted via apps and websites, in addition to email will provide flexibility, and potentially easier and quicker routes for engagement.

Statutory consultees for permanent and temporary TROs

27. Do you agree we should add freight organisations:

- **to the list of statutory consultees for permanent TROs?** Yes
- **to the list of statutory consultees for temporary TROs?** Yes

Why? It is essential that there is active engagement and consultation for all TROs that could affect freight operations. Rather than relying on the Traffic Authority to determine whether or not there is likely to be any impact, it would be simpler and easier to ensure that Logistics UK and the Road Haulage Association are included in the circulation of all TRO consultations. However, as Logistics UK receives hundreds of TRO emails each day, to ensure quicker and easier identification of proposals that are likely to impact on freight operations, it would be helpful for us as recipients, if where emailed, the title of the email provides some description of the TRO objective.

Examples of helpful email subjects which provide the purpose and location of the TRO:

- *Temporary closure of St Georges Road in the Borough of Great Yarmouth because of gas connection works (NTRO5067)*
- *20mph Speed Limit & 7.5 tonne weight restriction information: Minshull New Road/Smithy Lane, Crewe/Leighton*

Less helpful email subjects:

- *Draft TTMOs and Notices*
- *Letters*

Electric vehicle charge points

32. Do you agree with should streamline the process for installing EV chargepoints and introduce a unified consent process? Yes

33. How do you think the process should be streamlined?

Introducing a unified consent process for installing EV chargepoints, including consideration of a streamlined process for obtaining both the planning permission consent and the highways consent for the traffic management works at the same time will increase efficiency and allow for a quicker roll-out of EV chargepoints.

When simplifying processes for installing public EV chargepoints, regulatory restrictions for the types of electric vehicles that can use public chargepoints must be kept to a minimum; large vans and other commercial vehicle will also rely on access to the public chargepoint network and must be accommodated where feasible.

Final comments

34. Any other comments?

Logistics UK would like the development of a central system with a consistent format for all Traffic Regulation Orders (TROs) allowing organisations and individuals to sign up to what they want to be notified about. This could be broken down by geography, type of regulation (i.e. speed limit changes, weight/height/width restrictions, HGV parking bans, loading restrictions etc.).

Currently, Logistics UK receives hundreds of emails every day from highway authorities across the UK notifying us about proposed TROs. The quality of the consultations varies significantly, with some highway authorities just issuing legal notices in impenetrable language, presumably to tick a box that they have consulted. Whereas others are far more engaging, providing clarity in the email subject as to the nature of the TRO and accompanying it with a clear statement of reasons and maps detailing the location of the proposal.

Natalie Chapman
Head of Policy – South
Logistics UK
nchapman@logistics.org.uk