

RHA statement to Bath and North East Somerset Council on the introduction of a charge for Euro VI diesel HGVs exceeding 12 tonnes entering Bath City centre

The RHA wishes to place on public record our objection to the current proposal by Bath and North East Somerset Council to introduce a charge for Euro VI diesel vehicles exceeding 12 tonnes, which we understand the Council intends to implement “as soon as possible”. The RHA is a trade association representing over 7000 hauliers across the UK, 85% of whom are small and medium-sized businesses operating no more than 15 lorries in their fleet.

Our reason is simple - the HGV vehicle market cannot yet accommodate the proposal.

Whilst we share the same ambition as the Council to expedite the introduction of low and zero emission HGVs, we refer the Council to latest data provided by the European Automobile Manufacturers' Association (ACEA) which shows that, in 2020, 98.6% of the UK HGV fleet are diesel, with just 0.1% of the fleet being low or zero emission.

The reasons why take-up of low and zero emission HGVs is low are two-fold - lack of vehicle availability and, critically, lack of fuelling infrastructure to power these vehicles. We point out that, according to DfT statistics (table RF0101), low emission fuels in 2021 such as HVO, compressed natural gas or liquified natural gas collectively comprise 0.3% of the UK fuels market, compared to 54.7% (diesel) and 29.3% (petrol).

Given the state of the HGV and alternative fuels markets, we have the following concerns over the Council's proposal.

First, we are very concerned that the signal this proposal sends will distort the vehicle market by stimulating demand for the required vehicles that supply cannot meet. The impact will cause price inflation which is anti-small business due to their lack of buying power.

Secondly, the proposed exemptions for operators either delivering into Bath or based within a certain radius from the city are meaningless if the supply of the required vehicles is unavailable. Instead, the exemptions create unnecessary and burdensome bureaucracy, particularly for small businesses.

Finally, for those operators who do not qualify for the exemptions, the proposal has two consequences. First, it is an effective tax. When the supply of the required vehicles is unavailable, affected operators will have no choice but to pay the charge and pass it on to consumers. Secondly, the Council will be responsible for creating unnecessary additional emissions as affected operators seek longer detours to avoid the charge and displace traffic into neighbouring areas.

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We are also not clear why this proposal that purports to drive down emissions is targeted solely at diesel HGVs exceeding 12 tonnes. We refer the Council to the national air quality statistics (ENV 0301) which show that, within transport, cars and taxis account for 35% of NOx emissions, compared to 5% for HGVs.

Instead, we urge the Council to work with the logistics sector to reduce emissions in a manner which is sustainable and supports small businesses. Alternative ways exist to manage traffic within Bath and realise the environmental benefits we all desire.

We are open to modal shift, and would welcome the opportunity to work with the Council on how this can be achieved through an effective planning system aligned to the national programme to decarbonise the commercial vehicle fleet.

Road Haulage Association

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