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Dear Mike,

Thank you for your presentation on the longer semi trailers study at our meeting in Telford and also at the Ports and Infrastructure Group meeting. Based on feedback from members I am now writing to summarise the feedback that I have had on this proposal.

Overall, I think there is concern that the benefits that your modelled results suggest may be available for rail are not actually deliverable, or are not sufficiently large to outweigh in cost terms the benefits for road transport. Clearly a longer intermodal unit has a greater payload which could be beneficial to rail. However this will only be the case if the new units can be procured cheaply, used flexibly and do not create operational constraints which make rail use more difficult. Specifically;

- As the proposed units are (thankfully) no higher, the possibility of double stacking that you suggested already exists today and is not to the best of my knowledge utilised. At the meeting we heard of practical trials which have failed to double stack standard pallets due to loading and manoeuvrability constraints. As such I do not think that double stack can be included in your analysis.
- Whilst these longer units on a megfret can make use of W10 routes, many domestic services today are using specialised units which can divert onto W8 gauge routes as a diversion. Whether a customer would wish to lose this flexibility by switching to a unit that can only be accommodated on W10 routes is questionable – at least whilst we do not have a full strategic network of gauge cleared routes.
- Existing domestic flows use units which were grant aided – and must therefore run throughout the commitment period without replacement. However grant is not now available for mobile equipment in England and Wales, and the Scottish budget is set to reduce, so it is unlikely that further units could be applied for. This creates an additional expense for rail operators.

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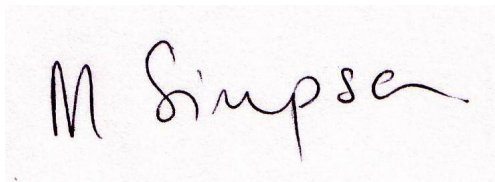
- The issue you raise regarding cranes must be explored to determine its significance. If, as you suggest, around 1/3 of sites are likely to be affected, this will be a significant barrier to using longer units and one which is not easily fixed. It could also affect the competitive position between regional terminals.

Issues such as those listed mean that in practical terms it is likely to be more difficult to utilise a longer unit on rail than on road. Given that the domestic sector on rail is still in its infancy, this is a material consideration for potential customers, and is likely to add to the inertia associated with switching modes.

We recognise that the remit for your study is UK only, but consider it would be appropriate to at least comment on the likely outcome if a European wide change were made. If the UK sought to deregulate, it would be very likely that others would follow suit, and this impact should at least be considered.

Finally, a number of members have expressed concern that length increases will in time again be followed by weight increases. Whilst this is not directly a matter for the study, it would be helpful if you can include such feedback to DfT as a consideration for their action.

Yours sincerely

A handwritten signature in black ink that reads "M Simpson". The signature is written in a cursive, flowing style.

Maggie Simpson
Policy Manager

Freight on Rail response to MDS Transmodal Evidence Gathering Exercise

Freight on Rail is disappointed with the decision by the Government to consider longer HGV trailers as any relative shift in favour of road transport runs contrary to development of the low carbon economy. While road and rail complement each other, larger long distance trunk movements of freight can be more sustainably carried by rail than in larger lorries.

In particular, longer trailers could damage the domestic intermodal rail market which while small at the moment is recognised as an emerging market for rail and is forecast to expand considerably over the next 15 years.

The forecasted figures for domestic non bulk,

excluding port traffic in billion tonne kms are as follows

2006	2015	2030
1.00	5.4	14.8

The key benefits of rail freight

Rail freight reduces road congestion with the heaviest bulk cargo train in the UK equal to 160 HGVs. Source RFG/RFOA paper October 2009

Using rail freight produces 70% less CO2 emissions than the equivalent road journey. Using rail freight produces 3.4 times less CO2 per tonne-km than road transport

Source DFT Logistics Perspective Dec 2008 P8 section 10

Rail freight is safer than long-distance road freight using motorway and A roads, as HGVs are over 3 times more likely to be involved in fatal accidents than cars due to a combination of size, lack of proper enforcement of drivers hours, vehicle overloading and differing foreign operating standards.

Source: Road Statistics 2008, Tables 3.2 and 3.6, Road Freight Statistics 2008 Section 5, both UK Department for Transport

Commercial Motor magazine of 5th November 09 points out that there are manoeuvring difficulties with the Big Maxx Kogel 18m

You need to pull the trailer further forward when reversing to tuck the longer overhand back in, Also more importantly when turning sharply in either direction the trailer cut-out is noticeable when observed from the rear. And being on the blindside, it is impossible to see the extra long trail as it swings out. Drivers will clearly need to bear this in mind not least when exiting a



narrow side road or in a left-hand filter lane alongside other traffic at lights especially if the junction is a tight one. The extra-long rear overhang could also prove a problem on ferry ramps.

Detailed comments on MDS Transmodal modelling and analysis

Freight on Rail is concerned that rail could be disadvantaged by an increase in trailer length of up to 2 metres, because the defined benefits in your models will not actually be sufficient to balance with the cost benefits to road and in fact may not be deliverable.

Double Stacking

Because of practical problems with double stacking we do not think that it should be included in your criteria.

Gauge constraints on the rail network

Many customers opt for specialist units which have the flexibility to use W8 routes when necessary. The longer units using a megafret could be confined to W10 gauge which is currently not extensive enough to allow a robust network with diversionary routes.

Constraints within grant aid

Existing domestic flows received grant aid and cannot therefore be replaced during the commitment period. Currently mobile equipment is not eligible for grants in England and Wales while the Scottish budget is likely to be reduced. What this means is extra expense for the rail sector.

Weight limit on cranes

If a significant number of cranes would not be able to handle the weight increase this would also be a serious obstacle to rail using longer units.

Threat of weight increases to follow

There is also a considerable threat to rail that road operators will demand an increase in weights for longer trailers in a few years which would undermine rail even further and could result in trainloads of freight returning to the congested network and increased emissions from freight.

European context

If the UK allowed the increase in length, it is highly likely that other EU member states would consider this increase. For example the Bog Maxx from Kogel is being evaluated in mainland Europe.

I am waiting to hear back from European colleagues on the likely impact to the rail market there and will supply feedback accordingly

Philippa Edmunds Freight on Rail Manager November 13th 2009



Freight on Rail is a partnership of many organisations promoting the economic and environmental benefits of rail freight

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