

The last mile - a call for evidence on the opportunities available to deliver goods more sustainably

Response form

Confidentiality and data protection

The purpose of this survey is to seek your views on the draft policy proposals for opportunities available to deliver goods more sustainably. It is carried out in the public interest to inform public policy.

As part of this consultation we request the following information:

Your name and email address - in case we need to ask you follow-up questions regarding any of your responses.

You don't have to give us this information. If you do, we will not share this information with anyone.

If you do give us your contact information, you consent to DfT using it only for the purpose set out above.

All your personal data will be deleted within 3 years of collection. You can withdraw your consent for us to hold your personal data at any time by emailing lastmilecfe@dft.gov.uk.

Find out more about the [Department for Transport's data protection and privacy policy](#).

Information about you

Name	Roger Geffen
email	Roger.geffen@cyclinguks.org
Company Name or Organisation (if applicable)	Cycling UK
Please tick one box from the list below that best describes you /your company or organisation.	
<input type="checkbox"/>	Micro ¹ , Small ² or Medium ³ Enterprise?
<input type="checkbox"/>	Large Company
<input checked="" type="checkbox"/>	Representative Organisation
<input type="checkbox"/>	Trade Union
<input type="checkbox"/>	Interest Group
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Member of the public
<input type="checkbox"/>	Other (please describe):

¹ up to 10 employees = micro enterprise

² up to 50 employees = small enterprise

³ up to 250 employees = medium enterprise

Consultation questions on opportunities and challenges

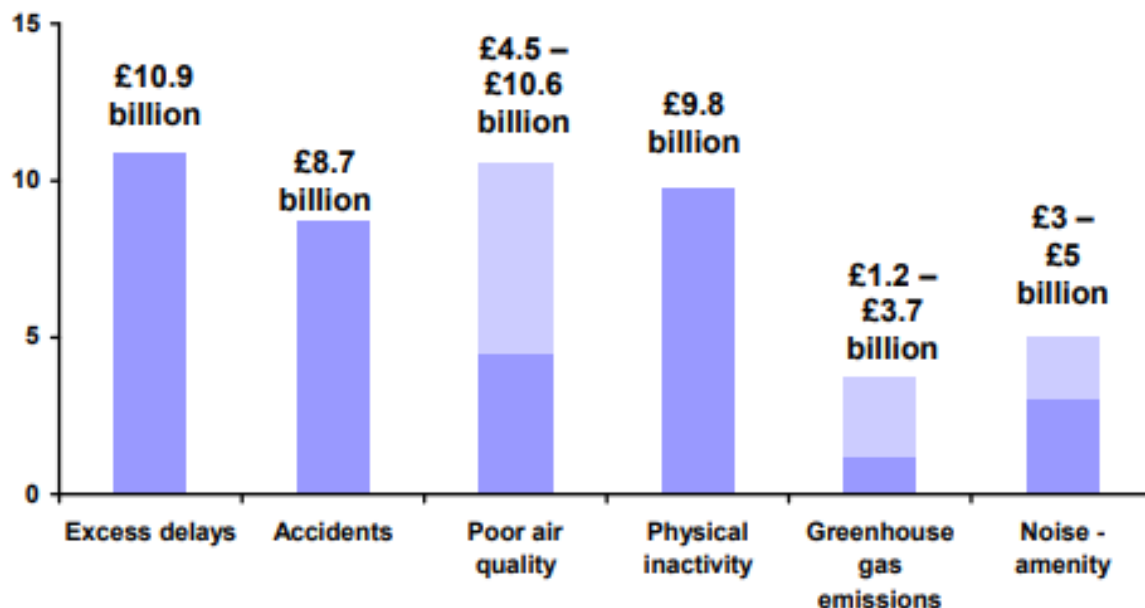
Q1. What is the potential scale of the opportunity here? How big a role could e-cargo bikes, micro-vehicles and e-vans play in reducing congestion and pollution in our towns and cities?

The only study which we are aware of which quantifies the potential impact of cargo bikes is the EU-funded Cycle Logistics project⁴ (to which Cycling UK contributed). This found that 25% of commercial goods deliveries, and 51% of all motor-vehicle trips involving the transport of goods (e.g. including shopping trips) could be accomplished by cycling.⁵

Q2. What would the environmental, economic and congestion benefits be? What impact would it have on jobs?

In our response to the Department for Transport's call for evidence on the 'Future of Mobility', we cited evidence from Cabinet Office Strategy Unit's report 'The wider costs of transport in English urban areas in 2009'⁶. In essence, it showed that the economic costs these four externalities were of similar magnitude: each was around £10bn annually.

Comparison of the wider cost of transport in English urban areas (£ billion per annum, 2009 prices and values)



It is for this reason that Cycling UK calls for action to halt and reverse the growth of road traffic, particularly in urban areas.

⁴ <http://cyclelogistics.eu/>.

⁵ http://cyclelogistics.eu/docs/111/D6_9_FPR_Cyclelogistics_print_single_pages_final.pdf.

⁶ <http://webarchive.nationalarchives.gov.uk/+http://www.cabinetoffice.gov.uk/media/307739/wider-costs-transport.pdf>.

Our response also noted the contradictory pressures on urban road space from:

- The growth in cycling, and the decline in personal car use, particularly among young people. This, of course, is a very desirable trend. However, maximising its potential requires the political will to reallocate roadspace in favour of non-motorised traffic, and the creation of protected cycle lanes alongside faster and/or busier main roads. We also cited evidence from Transport for London that its Cycle Superhighways are already enabling more people to travel along them than was previously possible with the road's former layout.⁷ The EU-funded FLOW project report⁸ provides a summary of international evidence of the effectiveness of cycle infrastructure in tackling congestion pressures.
- On the other hand, the growth in light van traffic. If left unchecked, this could undermine the realisation of the benefits of the progressive shift from car use to cycling and other healthy and sustainable options for personal journeys

It is therefore vital to support a shift of local freight to cargo-bikes, so that local logistics firms can benefit from protected cycling infrastructure, rather than viewing it as an obstacle to their activities.

We do not know of any research on the employment impacts of cycle logistics. The call for evidence rightly notes that there is a trade-off in the economics of urban logistics. Comparing cycling and van deliveries, cycling means a lower maximum weight and/or volume that can be moved by any one employee at a given moment. However it also involves lower operating costs and, in congested areas, allows each employee to make a greater number of deliveries per day.

Hence it is far from clear what the net trade-off would be in terms of the number of employees that cycle logistics firms can profitably employ. This will become apparent from trials and growing experience of cycle logistics operations. In any case, the economics of cycle logistics will become increasingly favourable as more cycling infrastructure is built and our towns and cities are progressively designed to be more people-friendly.

Q3. What other barriers need to be considered? Can these be overcome without Government support or intervention?

The main barriers where we believe Government intervention is needed are:

- The application of wider motor-traffic restraint policies, including road user charging, in order to free up road-space for cycling to then play its role as a healthier, safer, cleaner and more efficient alternative for many urban journeys (including freight journeys);
- The development of comprehensive networks of protected cycle lanes or tracks alongside faster and/or busier main roads, or through parks and open spaces, together with complementary measures to restrain through traffic and to lower vehicle speeds on local streets;
- The development of trans-shipment depots, where lorries and vans making longer-distance journeys can transfer their loads for 'last mile' delivery by cycling and other safer, cleaner alternatives (including electric vans).

⁷ <http://foi.tfl.gov.uk/FOI-1235-1718/20170317%20STB%20CSEW%20Journey%20Times%20V1.9%20R.pdf>.

⁸ http://h2020-flow.eu/uploads/tx_news/ FLOW_REPORT - Portfolio_of_Measures_v_06_web.pdf.

Q4. What can we learn from the experiences of other countries in this area?

Evidence from other countries, as documented in the aforementioned Cyclelogistics report, shows that cargo-bikes thrive in countries where there is also good cycling infrastructure, and an associated culture where cycling is seen as 'normal'.

Consultation questions on e-cargo bikes

Q5. What are the opportunities for e-cargo bikes for delivery organisations, manufacturers and retailers; for companies which maintain and service bicycles and for other, e.g. training, organisations?

We defer to those with experience of the specific opportunities for each of these organisation types.

Q6. Further to Q3 above, what form of financial support, if any, is required to make e-cargo bikes commercially viable, or to increase speed of uptake? Should this take the form of e.g. positive incentives or tax relief?

We do not have a view in principle on the specific form of support that should be provided. However we note that subsidies are currently available from the Office for Low Emissions Vehicles for the purchase of electric vans (and indeed for electric cars), but not for e-bikes. We can see no rationale for this. Whilst electric vans are clearly preferable to petrol or diesel vans in terms of their climate, air quality and noise impacts, the imbalance in the subsidies available for motorised and non-motorised electric vehicles is clearly a market distortion in favour of the former. That in turn is preventing the maximisation of the potential wider benefits of electric cargo bikes. These include reduced congestion and road danger, not to mention the health benefits to the riders as compared with drivers).

Q7. If financial incentives for businesses were introduced to increase the uptake of e-cargo bikes a clear definition of e-cargo bikes would be required, including load capacity and weight (under 250W; see Figure 2 as per EAPC Regulations). How could this operate in practice?

We have not formed a view on this question.

Q8. As e-cargo bikes are bicycles and do not need to be registered by the DVLA we would welcome your views regarding how purchases of e-bikes could be verified in order to qualify for financial support. How could this work in practice?

We have not formed a view on this question.

Q9. What legal changes – regulatory or deregulatory – would support the increased use of e-cargo bikes e.g. licensing, parking and insurance of bikes and riders? Should these be national or local? Would the current electrically assisted pedal cycle regulations be sufficient?

We have not formed a view on this question. We suspect the current EAPC regulations would be sufficient but will be interested to know the responses from operators on this point.

Q10. What emerging technologies can support the deployment of e-bikes e.g. batteries, regenerative energy storage, route mapping, electric trailers?

We agree that the above would all be beneficial.

Q11. If e-cargo bikes are to be widely taken up, what infrastructure changes would be required to change the way goods are currently distributed, which is at present often from large, out-of-town warehouses e.g. changes to roads, parking, loading zones, hubs, cycle lane design?

We reiterate our response to question 3, namely that the following are all needed

- The application of wider motor-traffic restraint policies, including road user charging, in order to free up road-space for cycling to then play its role as a healthier, safer, cleaner and more efficient alternative for many urban journeys (including freight journeys);
- The development of comprehensive networks of protected cycle lanes or tracks alongside faster and/or busier main roads, or through parks and open spaces, together with complementary measures to restrain through traffic and to lower vehicle speeds on local streets. Cycling UK's booklet Space for Cycling ;
- The development of trans-shipment depots, where lorries and vans making longer-distance journeys can transfer their loads for 'last mile' delivery by cycling and other safer, cleaner alternatives (including electric vans).

The principles of good cycle planning and design have been set out in guidance issued by Transport for London (its London Cycling Design Standards⁹), the Welsh Government (its Active Travel Act Design Guidance¹⁰) and Highways England (its Interim Advice Note IAN 195/16 'Cycle traffic and the Strategic Road Network'¹¹). Cycling UK has produced a booklet, 'Space for Cycling: a guide for decision-makers',¹² which provides a concise visually-appealing summary of these principles.

⁹ <https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit#on-this-page-2>.

¹⁰ <https://gov.wales/docs/det/publications/141209-active-travel-design-guidance-en.pdf>.

¹¹ www.standardsforhighways.co.uk/ha/standards/ians/pdfs/ian195.pdf.

¹² www.cyclinguk.org/sites/default/files/document/2017/10/space_for_cycling_guide_for_decision_makers.pdf.

We are pleased that the Government has now commissioned cycle-friendly guidance for the rest of England and is optimistic that it too will enshrine these same principles. We look forward to its publication, which is due by the end of this year.¹³

Q12. E-cargo bikes, electric or solely pedal powered are larger/heavier than everyday bicycles. What level of training should riders have? Should riders be required to have e.g. additional training on efficient cycling and the safe use of bikes?

We defer to The Association of Bikeability Schemes (TABS), and organisations with direct experience of cycle logistics operations, on the training needs for delivery riders. Whilst we agree that cargo bikes (including electric cargo bikes) are obviously larger and heavier than conventional bicycles, they are also more stable. Hence the need for training is less about the rider suffering injury due to being hit by motor vehicles, and more about avoiding strain injuries, or causing danger to other road users (notably pedestrians).

Q13. Should common standards be introduced for e-cargo and cargo bike design e.g. the design and standards of panniers and containers, volume limits and the refrigeration standards for carrying perishable goods?

Apart from refrigeration standards, it is not obvious that there is a need for common standards for cargo-bikes, beyond what is set out in the current regulations, given that the maximum power output inevitably limits the volume and weight that can be carried. The one other issue that may merit consideration is the standard of braking systems.

Q14. Are there any other points you wish to raise?

We do not have further points on cycle logistics, other than to strongly welcome the Government's interest in the subject.

However we do wish to make a wider point about urban lorries.

Heavy Goods Vehicles (i.e. those over 3.5 tonnes) pose a disproportionate threat to both pedestrians and cyclists. Although they account for just 3.6% of non-motorway motor-vehicle mileage on Britain's roads, they are involved in around 18% of cyclist fatalities and 14% of pedestrian fatalities. The problem is particularly acute in urban areas: lorries are involved in about a quarter of cyclist deaths in these locations and in well over half of cyclist deaths in London, even though they account for just 4% of miles driven there.¹⁴

Many urban cycling fatalities or serious injuries involve left-turning lorries, partly because most lorry cabs place the driver high off the ground with a lot of metal (rather than window) surrounding them. Compared with buses, it is far harder for lorry drivers to see cyclists or pedestrians alongside or in front of them.

¹³ www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2018-02-28/130509.

¹⁴ Figures based on the 2017 versions of DfT's *Road Traffic Estimates in Great Britain*, Table TRA0104 (www.gov.uk/government/uploads/system/uploads/attachment_data/file/722086/tra0104.ods); and *Reported Road Casualties Great Britain*, Table RAS40004 (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/665165/ras40004.ods).

Transport for London has been taking action to promote safe lorries, lorry drivers and operators, notably by:

- Establishing the Construction Logistics and Community Safety (CLOCS) standard, in conjunction with the logistics industry.¹⁵ This encourages and supports operators to commit to, and make progressive improvements on, issues such as the safety of lorries, lorry drivers and the management of construction site access;
- Drawing up a 'direct vision standard' for lorry cabs (which assesses how easily lorry drivers can see cyclists and pedestrians around them) and an associated 'star rating system' for lorry safety, as part of a scheme to progressively remove lorries which are unsuitable for use on urban streets;
- Establishing the London Freight Enforcement Partnership^{16 17} in conjunction with London's Police Forces and the Driver and Vehicle Standards Agency (DVSA), to strengthen collaboration in enforcing safety regulations against unsafe lorries, drivers and operators.

Cycling UK urges DfT to back these initiatives and standardise them nationally. Lorry operators themselves accept the need for some form safety regulation but would understandably resist having to comply with different rules in different cities.

Further information on all these proposals is set out in Cycling UK's response to DfT's recent consultation on its CWIS Safety Review.³¹

Q15. [For e-cargo bike operators] To assist DfT with evidence-gathering, how many e-cargo bikes are there in your fleet, and what are the range of costs for their maintenance and upkeep?

How to Respond

The consultation period will run between 30 July 2018 and 10 September 2018.

Complete this form and either email it to:

lastmilecfe@dft.gov.uk

Or post it to:

Cycling and Walking Policy
2/16 Great Minster House
33 Horseferry Road
London

¹⁵ www.clocs.org.uk/page/clocs-standard.

¹⁶ <https://tfl.gov.uk/info-for/media/press-releases/2015/october/enforcement-partnership-to-make-london-s-streets-safer>.

¹⁷ <https://tfl.gov.uk/info-for/media/press-releases/2017/november/partnership-checks-more-than-33-000-vehicles-to-keep-london-s-roads-safe>.

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Please ensure that your response reaches us before the closing date. If you would like further copies of this document you can request copies by e-mailing lastmilecfe@dft.gov.uk

A summary of responses, including the next steps, will be published within three months of the close of the consultation. Paper copies will be available on request. The consultation is being conducted in line with the Government's key consultation principles. Further information is available at: <https://www.gov.uk/government/publications/consultation-principles-guidance>.

If you have any comments about the consultation process please contact the Consultation Co-ordinator at consultation@dft.gsi.gov.uk. **Please do not send consultation responses to this address.**