HS1 Five Year Asset Management Consultation

1. Freight on Rail thanks HS1 for the opportunity to respond to its consultation.

2. Freight on Rail, a partnership of the rail freight industry, the transport trade unions and Campaign for Better Transport, works to promote the economic, social and environmental benefits of rail freight to local and central Government.

3. Freight charges Table 73 CP2 P104

We oppose the 450% access charge increases which would mean the end of freight on HS1 as it would effectively price freight off the network. Additionally it could undermine opportunities for freight on HS2 in the future if high gauge freight could not be carried on HS1 as it would break the high gauge route from the continent via the Channel Tunnel and then HS1.

We oppose this increase in charges on the following grounds:

a) A 450% charge increase is not affordable and is unreasonable.

b) HS1 is a key route for freight and a vital transport artery; it is the only European sized railway in the UK, (European high gauge) which means that much larger quantities of freight can be transported from the continent on each train. For example current services are loaded with European sized curtain sided swap bodies.

The significantly larger haulage capacity available from these swap bodies, with an internal height of three meters, means two standard pallets can be transported stacked on top of each other. This provides an efficient and economic means of transporting the maximum amount of product per train which reduces lorry miles and therefore road congestion as each train travelling on HS1 can remove up to 60 HGVs from our roads. Source DB Schenker which carries the traffic.

c) Barking terminal provides a location where freight from HS1 can be handled as it has the right high gauge rail connections to HS1. Network Rail has invested in network facilities to support this traffic going into Barking which would be wasted.

d) As the GLA Transport Strategy stated, (GLA London Plan Freight Policy 6.14 2010 & Mayor’s Transport Strategy P23) there is potential for high speed freight such as post and parcels to come from the Continent via the Channel Tunnel on HS1 into London.

e) In addition to the economic case for freight using HS1 there are significant environmental benefits derived from shifting freight from road to rail.

Greenhouse Gas emissions
Rail freight can help the Government meet its statutory climate change obligations on carbon dioxide emissions as rail produces around 70% less CO2 emissions than road for the equivalent journey.

Additionally, there are important air quality benefits of rail freight; parts of London are already in breach of European NOx regulations.

**Freight Transport: Average emissions in grams per tonne-kilometre**

<table>
<thead>
<tr>
<th>Mode</th>
<th>PM10</th>
<th>CO</th>
<th>NOx</th>
<th>CO2</th>
<th>VOC</th>
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</thead>
<tbody>
<tr>
<td>Rail</td>
<td>0.004</td>
<td>0.032</td>
<td>0.31</td>
<td>0.05</td>
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<tr>
<td>HGV</td>
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<td>0.33</td>
<td>1.74</td>
<td>0.17</td>
<td>0.15</td>
</tr>
</tbody>
</table>

Key:
PM10 particulate matter of less than 10 microns;
CO carbon monoxide;
NOx oxides of nitrogen;
CO2 emissions
VOC volatile organic compounds. Source RSSB 2007

**Noise Pollution**
Far fewer people negatively impacted by rail noise than road noise.
DfT stats: only around 40,000 people are impacted by rail noise, but around 700,000 people are impacted by road noise.

f) Rail is safer than road freight.

The latest DfT Statistics show that HGVs are involved in over half (52%) collisions on motorways even though they make up 11% of the traffic.

On local roads HGVs are five times more likely than cars to be involved in fatal accidents.

*Source: Traffic statistics table TRA0104, Accident statistics Table RAS 30017, both DfT*

DfT estimated that each road fatality cost society in human and other costs £1,790,200 in 2010- *Source A valuation of road accidents and casualties GB 2010*

g) Such massive increases in charges are contrary to Government policy to transfer freight to rail because of its economic, environmental and social benefits. Therefore we urge HS1 to give consideration to ways of reducing costs per train and encouraging more not less freight use of this key artery.

Philippa Edmunds  Freight on Rail Manager  November 2013