

Dearman comments

Page: [Policy T7 Freight and servicing](#)

Section: [N/A](#)

1. Dearman's main focus at the moment is developing our zero emission transport refrigeration unit (TRU), to help keep food produce cold during transit and eliminate nitrogen oxide (NOx) and particulate matter (PM) emissions. Although the main engine of a delivery truck is well regulated by the Euro emission standards, the secondary engine powering the TRU is currently not. From 1st January 2019, new TRUs going on the market will instead be regulated by the much weaker Non-Road Mobile Machinery Regulations (NRMM).
2. Due to this much weaker regulation for the secondary engine, a TRU can emit six times as much NOx and 29 times as much PM than the main Euro 6 engine- as highlighted by a University of Birmingham report (Doing Cold Smarter, published 2015). The new NRMM regulations are weaker than the Euro 3 standards for NOx emissions, and much weaker than the Euro 2 standards for PM emissions.
3. We support the Mayor's plans, as set out in the draft transport and environment strategies, to look at all NRMM emissions including from TRUs. We also welcome the Mayor's plans to look at red diesel use in London and how it disincentivises uptake of cleaner technologies. In addition to this, **Dearman recommends that Policy T7 should mention using planning powers to regulate TRU diesel emissions at fixed sites such as depots.** Dearman's analysis has identified 29 depots, a list of which we have previously sent across to the GLA (to Emma Fenton, Senior Policy Officer). Some of these depots are certainly within the GLA's boundaries and could be subject to stronger emission regulation. If, as paragraph D of Policy T7 mentions, consolidation and distribution sites are to be enabled for 24-hour operation, it becomes crucial to consider the further negative impact that will be had on air quality due to the operation of diesel TRUs.

4. Zero emission TRUs are also much quieter than diesel TRUs, and **creating a climate that encourages the uptake of zero emission TRUs would also aid Policy T7 paragraph G's aim to allow deliveries to take place at night time.** The noise level of a diesel-powered TRU can reach 75-80 decibels (db(A)), almost the equivalent of being near busy city traffic. Government research suggests the safe exposure limit is 85db(A). a Dearman TRU is currently as low as 65db(A) if uninsulated and has the potential to meet 60db(A) with an insulation pack where required. Non-diesel TRUs produced by our competitors, such as Air Liquide, Frostcruise and CryoTech, can also operate on noise levels of around 60db(A). For comparison, a normal everyday conversation would be 60db(A). 60db(A) is also the requirement of the Dutch government for retail trade businesses conducting loading and unloading operations. This requirement is known as the international PIEK standard.