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**Response to the**

**Department for Transport**  
**&**  
**Department for Infrastructure, Northern Ireland**  
**Consultation Paper**

**“Regulatory Changes to Support the Take-up of**  
**Alternatively-fuelled Light Commercial Vehicles”**

18 October 2017



## Response to Regulatory Changes to Support the Take-up of Alternatively-fuelled Light Commercial Vehicles

### Introduction

This is RoSPA's response to the Department for Transport and Department for Infrastructure, Northern Ireland Consultation Paper, "Regulatory Changes to Support the Take-up of Alternatively-fuelled Light Commercial Vehicles". It has been produced following consultation with RoSPA's National Road Safety Committee.

We need to reduce CO2 emissions from road vehicles, including vans, to meet national carbon reduction targets set out in the Climate Change Act, and to tackle nitrogen dioxide air pollution hotspots in our towns and cities. Vans spend much of their time driving routes around towns and cities, and over 96% of them are diesel powered. Therefore, the Government is promoting the uptake of cleaner and more efficient vans, but cleaner powertrains can increase a vehicle's weight, potentially reducing the amount they can carry.

The Government is seeking views on three proposals:

1. To increase the weight limit of alternatively-fuelled vans that can be driven on a category B driving licence in the United Kingdom to help overcome this potential barrier to the take-up of such vehicles. This would allow category B (car) licence holders to drive a slightly heavier vehicle, if it is powered by a low emission technology.
2. To exempt certain alternatively-fuelled vans from goods vehicle operator licensing requirements in Great Britain. This would introduce a similar exemption from operator licensing requirements for alternatively-fuelled vans used for own account haulage to help operators to avoid becoming subject to the full operator licensing regime if they invest in cleaner but slightly heavier vans.
3. Introduce MOT testing for electric vans in Great Britain to correct a regulatory anomaly, which means that electric vans are currently exempt from MOT testing.

RoSPA's response is restricted to our views on the road safety implications of the proposals.

### **Proposal to increase the weight limit of alternatively-fuelled vans that can be driven on a category B driving licence in the United Kingdom**

#### **RoSPA Response**

RoSPA generally agrees with the Department for Transport's proposal to increase the weight limit of alternatively-fuelled vans that can be driven on a category B driving licence in the United Kingdom. Many of these vehicles have been constructed specifically to run on these fuels with the extra weight taken into account, for example, when installing braking and suspension systems.

However, there are a number of aftermarket conversions available to conventionally-fuelled vehicles, notably Liquid Petroleum Gas, where braking systems, suspension components and tyres may not have automatically been upgraded as part of the conversion process. Therefore, we feel that the proposed derogation should only apply to newly-manufactured vehicles or those individually inspected by the vehicle manufacturer.



## Response to Regulatory Changes to Support the Take-up of Alternatively-fuelled Light Commercial Vehicles

RoSPA agrees that vehicles meeting the proposed derogation should be excluded from towing a trailer, regardless of their weight and size. We believe that it is important that operators with a mixed fleet of conventionally-fuelled and alternatively-fuelled vehicles must make sure that their employees who only have a category B licence are aware of the licensing restrictions for their vehicles. They should operate a robust licence-checking system so they know which of their drivers only have a category B driving licence. This will help them to prevent unauthorised use with trailers, particularly as these drivers will not be expected to undertake the Driver Certificate of Professional Competence (DCPC).

RoSPA agrees that drivers of alternatively-fuelled vehicles up to 4,250kg should not automatically be required to take the Driver CPC as these vehicles are similar in size to conventionally fuelled vans and will be often used for shorter journeys, particularly those used by small or local businesses. However, we are concerned that drivers who are no longer required to take Driver CPC may not undergo regular medical tests of their fitness to drive, nor receive as much driver education. This may increase their crash risk, so they should still be encouraged to undertake regular medical and eyesight checks to ensure that they are fit to drive.

It is also worth noting that alternatively-fuelled vehicles generally produce less noise to warn other road users so drivers need to be mindful that pedestrians and cyclists may not always be aware of their presence, and so safe and responsible driving, particularly in densely populated areas, is imperative.

Many toll roads base their fee structure on the weight of a vehicle, for example, the Humber Bridge toll charges are £1.50 for vehicles up to 3,500kg and £4.00 between 3,500kg and 7500kg. Therefore, employers should make sure their drivers are aware that if these vehicles are over the traditional 3,500kg they could be expected to pay a higher fee and that they have the means to pay the higher fee. As more than 1,500 people are killed or injured each year on the hard shoulder of motorways (Source: Green Flag Motoring Assistance), employers and drivers must be sure that they carry the correct change and so do not need to pull onto the hard shoulder whilst they make alternative arrangements. RoSPA would not like to see an increase in casualties related to instances where the driver has stopped on the hard shoulder because they do not have the correct payment to use a toll road.

As goods vehicles with a maximum laden weight of more than 3,500kg are currently required by law to have a speed limiter fitted, RoSPA is in favour of this regulation still being enforced, or at the very least being strongly encouraged. A number of large fleet operators already fit speed limiters on vehicles under 3,500kg and in the case of alternatively-fuelled vehicles, most notably Battery Electric Vehicles, the driving-range available when the vehicle is driven at high speed reduces significantly (sometimes by up to 50%). Once again, this could leave drivers stranded on the hard shoulder of a motorway if no charging facilities are available nearby.

RoSPA feels that if the policy were introduced, it would be timely to educate employers and drivers in relation to the overloading of vans, whether they are used for business purposes or by individuals who hire a vehicle to move house. In 2015-16, the Driver and Vehicle Standards Agency (DVSA) checked the weight of 2,158 light goods vehicles and 1,662 (77%) of these were subsequently issued with prohibition notices.

A number of these vehicles have extra long wheelbases or are 'luton' style vans that can easily exceed 3,500kg when just a few items of furniture or construction equipment are being carried – even if the vehicle appears to be half empty. This will also apply for alternative fuelled vehicles, especially those with an already high kerb weight due to batteries or fuel-cells. Overloading puts a substantial strain on tyres and makes the vehicle less stable, difficult to steer and take longer to stop.



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**Proposal to exempt certain alternatively-fuelled vans from goods vehicle operator licensing requirements in Great Britain**

**RoSPA Response**

RoSPA agrees with this proposal, but the points we make in response to the first proposal above also apply here.

**Proposals for roadworthiness testing for electric vans in Great Britain**

**RoSPA Response**

Given that the number of electrically-powered vans is growing, and is expected to continue to grow, RoSPA agrees that the exemption from annual roadworthiness testing for these vehicles should be removed.

RoSPA thanks the Department for Transport and the Department for Infrastructure, Northern Ireland for the opportunity to comment on the proposals. We have no objection to our response being reproduced or attributed.





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