

Consultation on Vehicle Lighting and Construction Regulations

17 July 2008

Consultation Response Form

Information about you:

Name:

The Royal Society for the Prevention of Accidents

Address:

RoSPA House, Edgbaston Park

353 Bristol Road

Birmingham

B5 7ST

E-Mail:

help@rospa.com

Please tick one box that best describes your organisation:

- Small to medium enterprise (up to 50 employees)
- Large Company
- Representative organisation/trade association
- Trade Union
- Interest Group
- Local Government
- Central Government
- Police
- Member of public

Other (Please Describe): *Accident Prevention Charity*

If you are replying on behalf of an organisation of interest group how many members do you have and how did you obtain their views?

RoSPA's response has been prepared following consultation with RoSPA's National Road Safety Committee.

Your views on the proposals

Retro reflective markings on Emergency Vehicles

Question 1.

Do you agree with our decision to amend the Road Vehicle Lighting Regulations (RVLR) to allow the police, fire and rescue, NHS ambulance services, VOSA enforcement vehicles and Highways Agency Traffic Officer vehicles to use their distinctive retro-reflective markings?

Yes No

RoSPA Response

The current situation is that distinctive retro-reflective markings are not allowed in the regulations, but temporary special orders issued under the Road Traffic Act allow the emergency services to use them.

RoSPA agrees that an amendment to the RVLR to allow the use of retro-reflective markers by organisations currently issued with special orders would simplify the situation.

Question 2.

Do you agree that permission to use reflective green, yellow and white on the side should be extended to non-NHS ambulances?

Yes No

RoSPA Response

RoSPA agrees with this extension on the understanding that it will only be permitted on vehicles that are used for emergency purposes.

Define Mountain Rescue vehicles as Emergency Vehicles

Question 3.

Do you agree with our decision to allow Mountain Rescue vehicles used for emergency purposes to use blue lights and sirens?

Yes No

RoSPA Response

Mountain Rescue Vehicles are not defined as emergency vehicles under the RVLRL, although they do carry out similar duties. RoSPA agrees with this extension, although it is important that the use of blue lights is accompanied by the requirements for drivers to undertake the same level of training required of other blue light users, such as the Police or the MOD.

Conspicuity Marking Tape on large goods vehicles

Question 4.

Do you agree with our proposal to require goods vehicles with a gross vehicle weight (GVW) exceeding 7.5 tonnes and trailers with a GVW exceeding 3.5 tonnes first used on or after 10th October 2009 to be fitted with retro-reflective conspicuity markings on the side and rear?

Yes No

RoSPA Response

RoSPA agrees with the requirements to fit goods vehicles with retro-reflective conspicuity markings. Research suggests that if conspicuity marking tape had been fitted to all vehicles in this proposal in 2005, it would have prevented 78 of 595 fatal accidents (13%) involving HGVs that occurred that year.

Question 5.

RVLR requires certain goods vehicles to be fitted with rear marking plates that comply with UNECE Regulation 70.00. Do you agree that such markings should be optional if retro-reflective conspicuity marking tape is fitted to the rear?

Yes No

RoSPA Response

RoSPA agrees that the retro reflective tape replaces the function of the current rear marking plates. However, there is the danger that some drivers are more used to identifying HGVs by the current markings, and so the use of both should be encouraged.

The requirements in other European Countries also need to be considered, as removing the markings may limit the use of an HGV in a country that still requires them.

Question 6.

Do you agree that, when fitted, rear marking plates should comply with the latest technical standard, UNECE Regulation 70.01?

Yes No

RoSPA Response

As there is a standard available and in use, it seems reasonable to maintain this standard to ensure consistency between vehicles.

General ECE alignment and clarify requirements for the use of lights on goods vehicles parked at night

Question 7.

Do you agree with the changes to align with UNECE Regulation 48?

Yes No

RoSPA Response

RoSPA agrees with these changes, which should help vehicle operators understand whether lighting requirements for parked vehicles apply to them.

An educational campaign in parallel with the changes would also raise awareness and improve compliance with the law.

Question 8.

Do you agree that the criteria used to determine which goods vehicles must leave position lights on when parked on the road side at night should be based on the gross vehicle weight rather than the unladen weight of the vehicle?

Yes No

Please add any additional comments you wish to make

RoSPA Response

RoSPA understands that although the criteria, 'Vehicles with a gross vehicle weight exceeding 2,500 kg should not be left parked at the roadside during the hours of darkness unless position lights are left on' replaces the previous rule that 'Vehicles with an unladen weight exceeding 1,525 kg should not be left parked at the roadside during the hours of darkness unless position lights are left on', in practice this will not affect the need for commercial vehicles parked on the road at night to leave their position lights on.

However, it would seem that this weight criteria would encompass vehicles such as people carriers. If this is not the intention, we suggest the definition should refer to 'goods vehicles with a gross vehicle weight exceeding 2,500 kg ...'

We also suggest that it is important that drivers parked in lay-bys leave their lights on to help the drivers of vehicles entering the lay-by in the dark.