



accidents don't have to happen

Ending the longer semi-trailer trial

RoSPA's response to the Department for Transport

January 2021



Response to Department for Transport's consultation: Ending the longer semi-trailer trial

Introduction

This is the response of The Royal Society for the Prevention of Accidents (RoSPA) to the Department for Transport's consultation on ending the longer semi-trailer trial. It has been produced following consultation with RoSPA's National Road Safety Committee, although the response does not necessarily reflect the views of all committee members. We have no objection to our response being reproduced or attributed.

The consultation asks whether the Department should end the existing longer semi-trailer trial (LST). The trial, which started in 2012, is testing the theory that the use of LSTs should lead to journey reductions, which in turn would lead to a reduction in transport congestion and emissions. Although planned to run until 2027, the Department believe that the trial has reached a point where continuing is unlikely to provide useful results and that remaining issues, relating to the safety, can only be answered outside of trial settings.



Response to Department for Transport's consultation: Ending the longer semi-trailer trial

Your details

Name

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Are you responding as an individual or on behalf of an organisation?

On behalf of an organisation.



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Organisation details

What is the name of your organisation?

The Royal Society for the Prevention of Accidents (RoSPA).

What size is your organisation?

50 to 249 employees.



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The trial of longer semi-trailers (LSTs), which are articulated goods vehicles, began in January 2012 with an allocation of 1,800 semi-trailers.

Originally the period of the trial was set at 10 years so that operators taking part could recover the cost of purchasing and operating an LST. In January 2017, the trial was extended by 5 years and the number of LSTs increased by an additional 1,000. This was in order to:

1. enable more operating experience to be gained
2. include a greater number of operators

Has your company operated LSTs in the trial?

RoSPA response

No.



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Use of LSTs

Before the trial, it was theorised that the use of LSTs should lead to journey reductions, which in turn would lead to a reduction in transport:

- congestion
- emissions

The trial's purpose was to discover if these original hypotheses would, in fact, be realised in practice. To date the trial data has confirmed the original viewpoint.

As a consequence, although the trial was to run until 2027, we now believe the trial has reached a point where continued evaluation is unlikely to provide additional statistically significant results and that remaining questions, relating to the safety of LSTs in use, can only be answered outside of a trial setting.

We are therefore proposing ending the trial and are seeking your views on the next steps to take.

Do you agree that the LST trial should be concluded prior to its planned end date of 2027*?

RoSPA response

Yes.

You are in favour of ending the trial because:

RoSPA response

RoSPA believes that there is sufficient data in order for a decision to be made at this time.



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Using LSTs outside of trials

The trial evaluation includes a survey carried out in 2016 to 2017 where operators were asked how many LSTs they would seek to include in their fleets if they were not restricted by trial conditions or quantity caps.

This survey has provided data which suggests that, without these restrictions, LSTs would make up between 10 to 20% of the total UK semi-trailer fleet.

Do you believe that LST use should be permitted in general circulation with no restriction on numbers?

RoSPA response

RoSPA agrees that LSTs should be permitted with no restriction on LST numbers, although with additional regulations to those imposed on HGVs.



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LST regulation

We are seeking your views on 3 approaches for the post-trial use of LSTs. The approaches we suggest for LST regulation are either a:

- general circulation approach
- light regulation approach
- heavier regulation approach

The general circulation approach

Here we suggest we regulate LST's on the same basis as 13.6 metre trailers with the sole addition that operators are required to ensure that LST drivers have appropriate training.

Light regulatory approach (our preferred option)

Here we suggest we would regulate to general circulation approach levels plus require a:

1. route risk assessment monitoring that LSTs are using set routes
2. system of driver feedback

Heavier regulatory approach

In this option we suggest that we regulate to the previous 'lighter regulatory' approach plus require:

1. LSTs to operate at least 80% of the time on major roads; operators must accurately track LSTs by GPS, plus retain data
2. there is an approved LST CPC course for drivers
3. there is an annual authorisation from the traffic commissioner to operate LSTs over 10 years of age 80% of the time on major roads

In your opinion what level of regulation should be required for LST operating outside the trial?

RoSPA response

The lighter regulatory approach, although RoSPA does see the benefit of more rigorous driver training required in the heavier regulatory approach.



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Data requirement

Operators within the trial are required to submit data every four months to the Department for Transport's independent evaluation consultant.

This data comprises:

- company information, including information about their size, nature of business and non-LST semi-trailer fleet
- trailer information which is basic information relating to company Trailer IDs, their Vehicle Identification Numbers (VINs), design details and the numbers of days 'off the road' in the required period
- journey information, which summarises all the LST journeys on the public road network in the period on a 'per trailer' basis
- incident information, including all LST incidents on the public highway plus certain types of incident on private property (for example in depots and at client sites) as well as summary of non-LST incidents (including damage-only incidents)

You agree that the data required to be collected by operators outside of the trial conditions should be:

RoSPA response

RoSPA believes that the data required to be collected by operators should be the same as trial conditions.

With regards to our risk assessment proposal you think operators should:

RoSPA response

RoSPA believes operators should be required to undertake risk assessments of routes, retain the data and be required to provide a copy to the police and other authorities (DVSA, OTC or Traffic Commissioner) on request.



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Journey

We are proposing that 80% of a LSTs journey must be completed on the strategic road networks in England and Wales and the Trunk Road network in Scotland.

The Strategic Road Network in England comprises motorways and some A roads and is managed by Highways England. The Scottish Trunk Road Network is managed by Transport Scotland and the Welsh Government strategic road network is managed by Traffic Wales.

Do you agree that each LST should be required to undertake at least 80% of each journey on the Strategic Road Network?

RoSPA response

Yes.

Do you agree with operators being required to track LSTs via GPS to ensure the 80% requirement is being achieved, retaining the data and making it available to the police, DVSA, OTC and the traffic commissioner on request?

RoSPA response

Yes.

Do you agree that operators should be required to report to the department serious incidents that led to:

RoSPA response

	Yes	No	Don't know
Loss of life on public roads and private land?	X		
Injury on public roads and private land?	X		
Damage on public roads and private land	X		



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Driver training

We are proposing to require drivers operating LSTs to undertake training which lasts a minimum of half a day before they are able to operate a LST.

Do you agree with this training proposal for the:

RoSPA response

	Yes	No	Don't know
Lighter approach?	X		
Heavier approach?	X		

Do you think we should require operators to undertake a risk assessment of proposed routes?

RoSPA response

Yes.

Traffic commissioner requirement

Do you think we should require operators to obtain specific authority from the Traffic Commissioner to operate LSTs?

RoSPA response

Yes.

Do you think we should require annual authorisation from a traffic commissioner to operate an LST over 10 years of age?

RoSPA response

No.



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Technical requirements

Do you think that the lighter additional regulatory option is a barrier to you:

RoSPA response

RoSPA does not operate LSTs and therefore is not in a position to comment.

Do you think that the heavier additional regulatory option is a barrier to you:

RoSPA response

RoSPA does not operate LSTs and therefore is not in a position to comment.



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General circulation regulation of LSTs

If there was a situation where there were no additional regulatory measures required for LST purchase and operation which of the following would apply to you?

RoSPA response

RoSPA does not operate LSTs and therefore is not in a position to comment.

What, if any, further comments or barriers to owning LSTs with no additional regulation do you have?

RoSPA response

RoSPA does not operate LSTs and therefore is not in a position to comment.



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LST costs and benefits

What, if any, other costs or benefits have not been included in the impact assessment that you think should be considered?

RoSPA response

RoSPA believes that all costs and benefits have been included in the impact assessment.

Any other comments?

RoSPA response

Although RoSPA believes that the safety of LSTs must be further considered, we recognise that the trial has reached a point where continuing is unlikely to provide useful results and that remaining issues, relating to the safety, can only be answered outside of trial settings.

RoSPA has no further comments to make on the consultation process, other than to thank Department for Transport for the opportunity to comment. We have no objection to our response being reproduced or attributed.

