

Changes to driving licence flexibility for alternatively-fuelled vehicles

RoSPA's response to Department for Transport and Office for Zero Emission Vehicles' consultation

October 2022



Response to Department for Transport and Office for Zero Emission Vehicles' consultation: Changes to driving licence flexibility for alternatively-fuelled vehicles

Introduction

This is the response of The Royal Society for the Prevention of Accidents (RoSPA) to the Department for Transport and Office for Zero Emission Vehicles' consultation on changes to driving licence flexibility for alternatively-fuelled vehicles. It has been produced following consultation with RoSPA's National Road Safety Committee. We have no objection to our response being reproduced or attributed.

The consultation seeks views on potential changes to driving licence flexibility for alternatively-fuelled vans and other vehicles of similar weight.

The current licensing flexibility permits drivers to operate slightly heavier goods vans than the typical weight entitlement, in order to allow for the extra weight of a cleaner power system, for example, vehicles powered by a battery.

The consultation focuses specifically on:

- additional training that drivers must complete to gain driving licence flexibility
- types of vehicles that should be eligible
- towing allowance of these vehicles
- powertrains that should be eligible



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Personal details

Your name

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

On behalf of an organisation.

Your organisation's name is?

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



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Training requirement

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/695984/cat-b-driving-licence-derog-gov-response.pdf

Which is your preferred option in regards to the training?

- Reforming the training plus expanding the pool of instructors eligible to offer the training
- Removing the training requirement
- Maintaining the current practice

RoSPA response

Maintaining the current practice.

If you believe the training requirement should be retained, Who, in your view, should the pool of instructors eligible to offer the training be expanded to?

RoSPA response

RoSPA is not in a position to suggest who the pool of instructors eligible to offer the training should be, which is why our view is that the current regime should continue. Currently, the training can only be provided by members of the National Register of LGV instructors and the National Vocational Driving Instructors Register. However, we do recognise that as the uptake of alternatively fuelled vehicles increases, the demand for training from this group of individuals will rise. We would therefore be open to the pool of eligible trainers being expanded to a qualified and carefully considered group of instructors.

Should the pool of instructors be expanded, RoSPA would like to see quality assurance processes in place. It is vital to have confidence that trainers are properly assessing candidates so that driving standards are maintained.

Should, in your view, there be a voluntary accreditation scheme similar to the current training?

RoSPA response

Yes. RoSPA would be opposed to the training requirement being removed, but should this proposal go ahead, we would expect that a voluntary accreditation scheme would be in place.

However, we urge that the potential consequences for road safety are considered before making any decision to remove the training requirement. Although in the absence of compulsory training, a voluntary accreditation



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scheme would be desirable, it would not be mandatory, meaning that it would not be possible to ensure that road safety standards are maintained.

It is unclear whether drivers would want to continue taking this training if it is no longer required. Clearly some drivers would wish to take training, and some employers may require their employees to do so, as driving an electric vehicle is quite different to driving a petrol or diesel vehicle. However, for some, we would expect that an incentive, such as insurance discounts on completion of training may be required.

Can you explain and quantify any advantages or disadvantages (e.g. economic, environmental, safety) of these potential changes to the training requirement?

RoSPA response

RoSPA recognises that from a practical and economic point of view, there are a number of advantages to continuing with the derogation, as it removes the upfront costs for business and drivers of obtaining a category C licence, medical examinations and the requirement for the uptake of CPC for category B licence holders to drive alternatively-fuelled goods vans with a maximum authorised mass (MAM) of 4,250 kilograms (kg), over the standard 3,500kg entitlement. The derogation was granted to avoid constraining payload for operators using cleaner, alternatively-fuelled options, predominantly battery electric vehicles. Removing the requirement for the five hour training would further reduce costs to drivers and businesses.

We also recognise that there are a number of environmental benefits of the derogation, which could be optimised by removing the requirement for training. These include reduced tailpipe emissions and improved air quality, increased uptake of zero-emission vehicles and reduced noise pollution. Despite this, it could be argued that these vehicles result in increased particle matter due to increased strain on tyres and wheels from the increased weight.

RoSPA believes the potential risk to safety of the driver and other road users outweigh the potential cost savings associated with removing the training requirement. Driving an electric vehicle is significantly different to driving a petrol or diesel vehicle. The main advantages of electric vehicles are that they emit zero emissions, are less likely to harm the environment and can be cheaper than petrol or diesel cars to run and maintain. However, despite their environmental benefits, electric vehicles bring a new set of road safety challenges. These include silent running at low speeds, which can be dangerous for nearby vulnerable road users, particularly where no noise-emitting device is installed. These vehicles can also accelerate very quickly and are very quiet when travelling at high speeds, which may reduce the sensation of speed for the driver, inadvertently leading to excessive speed. In addition, the impact of collisions involving vehicles with a higher mass could be greater, meaning it is essential that those driving these vehicles are trained to do so safely. For these reasons, RoSPA urges that the training requirement is maintained.

As drivers begin to make the switch to electric vehicles, they should be encouraged to go on specialist training courses and gain qualifications such as RoSPA's new Level 2 defensive driving for electric vehicles to improve their awareness and help them adapt their behaviour to remain safe in these new types of vehicles. As electric vehicles begin to be introduced in the workplace, it is arguable that there is need for additional training, on top of the



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current mandatory training. We will need to encourage employers to invest in banksman training. It becomes even more important for pedestrians to be aware of moving vehicles, for drivers to be aware that pedestrians might not hear them approaching and for banksmen to support safe manoeuvring.

RoSPA believes that it is vital that we maintain the professional standard of our vocational drivers ensuring the safety of all road users. We have concerns about the proposal to remove current training requirements as this could have negative impacts on road safety.

In your view should drivers be given provisional entitlement to operate these vehicles as part of their training?

RoSPA response

Yes. Category B licence holders are not currently entitled to operate AFVs within the 3,500 to 4,250kg weight range as part of their training. It seems sensible that a reformed training programme should include provisional entitlement to operate these vehicles, as this would offer practical training experience.



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Vehicle types

What data, if any, can you provide on the safety of AFVs within this weight range, especially in comparison to petrol or diesel equivalents?

RoSPA response

RoSPA does not have access to any data on the safety of AFVs in this weight range. As far as we are aware, it is not possible to identify collisions involving vehicles in this category as part of the Reported Road Casualties Great Britain data published by the Department.

Should we expand the derogation to include other AFVs, beyond goods vans?

RoSPA response

RoSPA is not in a position to comment.

What types of vehicles, in your view, should be included?

RoSPA response

RoSPA is not in a position to comment.

Can you explain and quantify any advantages and disadvantages (e.g. economic, environmental, safety) of expanding the derogation to other AFVs, beyond goods vans?

RoSPA response

RoSPA recognises that accessible vehicles, such as those for wheelchair users, require additional equipment. Emergency vehicles also have onboard requirements. As such, these vehicles are naturally larger and heavier, potentially taking them above the 3,500kg entitlement of a category B licence. The extra powertrain weight may mean that category B drivers are ineligible to operate cleaner equivalents of these vehicles. This presents practical challenges.



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The economic and environmental benefits would be similar to those described in our response to the same question on training proposals.

Our safety concerns are also similar to those above, in that the impact of collisions involving vehicles with higher mass are likely to be greater. Our other concerns here are in relation to fitness to drive. Currently, a category C or C1 licence is required to drive these vehicles above 3,500kg. To obtain these licences, drivers under 45 must self-certify their medical fitness to drive, and those over 45 must undertake an examination by a healthcare professional. If the derogation is extended beyond goods vans, these drivers would no longer be required to conduct a medical assessment, which presents a potential risk. If the derogation is expanded, consideration must be given to this, and we would urge that additional training is required for these drivers to help them to understand the differences between driving alternatively fuelled and petrol and diesel vehicles. This is necessary to maintain road safety standards.



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Towing allowance

Should category B drivers be allowed to tow a trailer with an AFV between 3,500kg and 4,250kg up to 7,000kg MAM?

RoSPA response

No. RoSPA was strongly opposed to the initial proposals to allow standard licence holders to tow a trailer without first taking the B+E test.

Can you explain and quantify any advantages and disadvantages (e.g. economic, environmental, safety, data) of allowing AFVs between 3,500kg to 4,250kg to tow a trailer?

RoSPA response

RoSPA has a number of safety concerns about this proposal. The skills required to couple and uncouple a trailer, perform reversing manoeuvres and tow a trailer on the road need to be taught and assessed to ensure the safety of all road users is not compromised.

Even though the DVSA encourage drivers to obtain professional training before first towing a car and trailer combination, this is not mandatory, meaning that it is not possible to ensure that road safety standards are maintained.

Without a test requirement, there is no way of ensuring that drivers are competent in towing before they are able to tow a trailer. Government statistics show that in 2021/22, the pass rate for car and trailer tests was 69.3%¹, meaning that currently, almost one in three drivers do not pass, as they do not meet the requirements to safely tow a trailer. Without a test, these drivers will be able to tow, even though their performance on test suggests they are not yet competent to do so.

¹ Department for Transport and Driver and Vehicle Standards Agency (2021) 'Driving test statistics (DRT)'

<https://www.gov.uk/government/statistical-data-sets/driving-test-statistics-drt#car-driving-test-pass-rates-drt02>

Date accessed: 25/08/2021.



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The training and test to acquire a B+E licence involves not just a driving test, but also practicing and demonstrating safety manoeuvres, such as coupling and uncoupling safely and "show me, tell me" safety questions (checking brake fluid, indicators, horn and tyres; loading and securing a load and checking the overall security of vehicle and trailer). Without a test or training, we would be concerned that some drivers may not be competent in these areas before towing.

The clear benefit to drivers is that there would be savings to be made, as they would not be required to take a B+E test. There would also be benefits for some businesses who use a van and trailer combination.

However, the potential negative impacts on road safety of drivers not taking a test or opting not to take training has dis-benefits for the driver and all other road users. We believe that this dis-benefit outweighs the benefits.



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Fuel types

Should the derogation be redefined to bring it in line with the Government's 2030 and 2035 phase-out dates for non-zero emission vehicles?

RoSPA response

RoSPA is not in a position to comment.

Can you explain and quantify any advantages and disadvantages of maintaining the existing definition of eligible fuels for the derogation?

RoSPA response

RoSPA has no further comment.

Further comments

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

