



accidents don't have to happen

**Response to**

**Transport for London**  
**Consultation Paper**

**“Direct Vision Standard”**

18 April 2017



## Response to Direct Vision Standard

### Introduction

This is RoSPA's response to the Transport for London's consultation paper, "Direct Vision Standard". It has been produced following consultation with RoSPA's National Road Safety Committee.

### About you

**1 What is your name?**

Kevin Clinton

**2 What is your email address?**

[kclinton@rospa.com](mailto:kclinton@rospa.com)

**3. Please provide us with your postcode? (You do not have to provide your postcode, but it is useful for analysis purposes. All personal details will be kept confidential.)**

B15 1RP

**4 How did you find out about this consultation?**

- Received an email from TfL

### Our proposals

**5 To what extent to you agree or disagree that adopting a Direct Vision Standard (DVS) for HGVs (Heavy Goods Vehicles) has the potential to improve HGV and vulnerable road user safety?**

- Strongly Agree

### Comments

Road accident data and the various research studies referenced by TfL in the consultation paper show the high risk that collisions with HGVs pose to vulnerable road users. Although HGVs only made up just 4% of the miles driven in London, they were involved in about 78% of pedal cyclist deaths and 20% of pedestrian deaths in 2015. As the consultation paper shows HGV driver blind spots are a key factor in these deaths.

Good progress has been made in updating the regulations requiring additional mirrors on HGVs, and in the development and implementation of new technological solutions, such as cameras and sensors, to help improve the drivers' field of vision, especially to the front and side of these large vehicles. However, the risk and harm suffered by vulnerable road users continues.

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Therefore, RoSPA agrees that more needs to be done to improve the direct view of drivers, in addition to their indirect view through mirrors, cameras and sensors. We believe that the creation of TfL's Direct Vision Standard, which is based on solid research, evidence and in consultation with HGV manufacturers and operators, will be an important and effective way of improving HGV and vulnerable road user safety.

We support TfL's implementation approach of specifying the technical requirements of the Direct Vision Standard and then mandating its mandatory introduction in a phased timetable is a pragmatic and practical approach.

TfL's experience in developing and implementing the FORS and CLOCS programmes in conjunction with the freight and haulage industry show that this approach is likely to be effective.

**6 To what extent do you agree that HGVs with the least direct visibility and therefore a 'zero' DVS rating should be banned from London's streets by January 2020? (More detail on this proposal will be subject to further consultation later in 2017)**

- Strongly agree

### Comments

Although we are not in a position to assess the practicalities for HGV operators in replacing any of their vehicles which will be rated as zero in the Direct Vision Standard by 2020, RoSPA believes that the principle of banning such vehicles from London's streets is correct, given the higher risk they cause to vulnerable road users.

New vehicles purchased by operators from the date this standard is made "official" must be compliant and such a standard will drive manufacturers in the right design direction so it will be attained by default over the years to come. Whether it is a viable aim to have this in place by 2020 is another matter and there may well have to be a bit of flexibility in this date.

It would be useful to understand what the practical implications are likely to be; how many of the current vehicles on the market would fail to meet the minimum safety standard. Given the cost to replace a nearly new vehicle, haulers may introduce mini transport hubs with goods being transferred to LGVs below 3500 tonnes. These vehicles might have a lower maintenance and driver training standard.



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**7 To what extent do you agree that only HGVs with a 'good' direct visibility or 'three star' DVS rating and above should be allowed on London's streets by 2024? (More detail on this proposal will be subject to further consultation later in 2017)**

- Strongly agree

**Comments**

Again, RoSPA does not have sufficient information to judge the practicalities for HGV operators of only being able to use vehicles which have a 'good' rating (three stars or more) in the Direct Vision Standard by 2024, RoSPA believes that the principle of introducing this mandatory rule is correct, given the higher risk they cause to vulnerable road users.

The timetable of 2024 allows a period of around seven years which provides considerable notice, and the implementation of the FORS and CLOCS programmes demonstrate that the industry, TfL and other partners are able to work together successfully to introduce effective improvements to the construction and operation of HGVs on London's streets.

**8 Do you think that the DVS star rating should be displayed on the vehicle?**

- Yes I think it should be displayed

**Comments**

Displaying the DVS rating on vehicles is likely to make monitoring and enforcement easier, promote the Direct Vision Standard and help to motivate all HGV operators to demonstrate that they support and adopt the Standard. However, it's important that vulnerable road users do not fall into the mindset of 'the vehicle is a higher standard DVS so the driver will be able to see me'. All road users have a responsibility to maintain effective observations and put themselves in a road position where they can see and be seen'.

**9 Do you have any other comments about our current plans to use the DVS to improve HGV safety?****Comments**

RoSPA supports the proposal for the frontal zone to have the highest weighting when calculating a DVS rating based upon the prevalence of accidents. However, we are not convinced that the near side zone should have a lower, medium weighting, given the prevalence and severity of crashes with cyclists that involve a collision on the near side of the HGV.

RoSPA believes that this should be reviewed and see no reason why the frontal and the near side zones should not both have the highest weighting.

Of course, not all collisions between HGVs and vulnerable road users are due to vehicle blind spots; poor observation is also a factor.



## Response to Direct Vision Standard

**10 If responding on behalf of an organisation, business or campaign group, please provide us with the name:**

RoSPA

**11 Are you responding as:**

- Other (please specify):

An accident prevention charity. RoSPA's response has been produced following consultation with our National Road Safety Committee

**The Direct Vision Standard**

The Direct Vision Standard uses an objective assessment to generate a rating from zero (least) to five (most) the amount of direct vision the driver has of the areas of greatest risk to cyclists and pedestrians around an HGV. It is important that the DVS is understood and that ratings are applied fairly and consistently. Please see <https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/direct-vision-in-heavy-goods-vehicles> for more information. We are working with HGV manufacturers and others to refine the DVS now to be able to produce star ratings for HGVs. We want to better understand your views on the DVS concept itself.

**13 Who do you think should be responsible for producing the DVS star ratings for HGVs?**

- TfL

**Comment**

RoSPA believes that a single, objective, body should be responsible for producing the Direct Vision Star ratings for HGVs, and that TfL is the logical body given its experience and expertise in developing the Direct Vision Standard, the many other safety improvements involving indirect vision and in creating and managing the FORS and CLOCS programmes.

**14 Please provide any further comments on the more detailed principles and/or technical aspects of the DVS as developed to date.****Comment**

RoSPA thanks the Transport for London for the opportunity to comment on the proposals. We have no objection to our response being reproduced or attributed.



## Response to Direct Vision Standard

**About the consultation material**

**15 What do you think about the quality of this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and questionnaire etc.)?**

Good

**Do you have any further comments about the quality of the consultation material?**

**Comment**

A word document or pdf document with the consultation questions would have been helpful, rather than only being able to view the questions by opening the online survey.

Please note that the question numbering in the consultation jumped from question 11 to question 13, so our response follows this numbering.

**Almost Done...**

You are about to submit your response. By clicking 'Submit Response' you give us permission to analyse and include your response in our results. After you click Submit, you will no longer be able to go back and change any of your answers.

If you provide an email address you will be sent a receipt and a link to a PDF copy of your response.  
Email address

[kclinton@rospa.com](mailto:kclinton@rospa.com)





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**RoSPA Head Office**

28 Calthorpe Road  
Birmingham  
B15 1RP

 +44 (0)121 248 2000

**RoSPA Scotland**

43 Discovery Terrace  
Livingstone House  
Heriot-Watt University Research Park

Edinburgh  
EH14 4AP

 +44 (0)131 449 9378/79

**RoSPA Wales**

2nd Floor  
2 Cwrt-y-Parc  
Parc Ty Glas  
Cardiff Business Park  
Llanishen  
Cardiff  
CF14 5GH

 +44 (0)2920 250600

**RoSPA Northern Ireland**

3 Orchard Close  
Newpark Industrials Estate  
BT41 5GH

 +44 (0)28 9050 1160

**General Enquiries**

 +44 (0)121 248 2000

 +44 (0)121 248 2001

 [help@rospa.com](mailto:help@rospa.com)

 [twitter.com/rospa](https://twitter.com/rospa)

 [facebook.com/rospa](https://facebook.com/rospa)

 [linkedin.com/rospa](https://linkedin.com/rospa)

**www.rospa.com**

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