

RoSPA Response to

“Introduction of a Heavy Goods Vehicles Safety Standard Permit as part of the Direct Vision Standard”

A Transport for London Consultation Paper

24 January 2018



Response to “Introduction of a Heavy Goods Vehicles Safety Standard Permit as part of the Direct Vision Standard”
Consultation Paper

Introduction

This is RoSPA’s response to the Transport for London consultation paper “Introduction of a Heavy Goods Vehicles Safety Standard Permit as part of the Direct Vision Standard”. It has been produced following consultation with RoSPA’s National Road Safety Committee.

In London, HGVs are overrepresented in collisions with vulnerable road users. In the last three years, they have been involved in 20% of pedestrian fatalities and over 70% of cyclist fatalities, despite only making up 4% of the miles driven in London.

Between 2013 and 2015, 116 pedestrians and cyclists were killed or seriously injured in collisions with goods vehicles over 3.5 tonnes. Almost half (45%) of the collisions involving a left turn manoeuvre involved tipper HGVs; a further 55% involved other HGV types. Of the 225,000 estimated unique HGVs (over 12 tonnes) entering London each year, it is estimated that 100% have sideguards and Class V and VI mirrors; 8% have camera, sensor and audible warning systems; 20% of drivers have undertaken vulnerable road user theory training; and 8% have undertaken on-cycle practical training

Restrictions in HGV drivers’ field of vision (‘blind spots’) are a significant contributory factor in these collisions. Construction type vehicles, such as tippers and skip-loaders, are over-represented in these crashes, but other types of HGVs are also involved. The Direct Vision Standard was specifically developed to help improve the design of large HGVs involved in collisions where a contributory factor was the blind spot.

However, research shows that HGV drivers react quicker and are less likely to be involved in a collision when they can see vulnerable road users directly through the cab window. Therefore, improving the direct vision of the driver from HGV cabs has the potential to save lives. Therefore, Transport for London propose to introduce a HGV safety standard permit scheme and aim to ban or restrict zero star rated HGVs from London’s roads in 2020 and those that score less than three stars from 2024.

Some construction type vehicles have a good Direct Vision Standard’ star rating. The freight industry has already made significant progress in improving the safety of HGVs, generally by retrofitting safety equipment to existing HGV designs.

Transport for London previously consulted on the Direct Vision Standard itself and its proposals on how it could be used to reduce road danger early in 2017. RoSPA’s response to that consultation can be viewed on RoSPA’s website at <https://www.rospa.com/rospaweb/docs/advice-services/road-safety/consultations/2017/direct-vision-standard-hgvs.pdf>.

The Mayor’s aim is that no deaths or serious injuries from road collisions occur on London’s streets by 2041. Vision Zero forms part of the Mayor’s ambition to create ‘Healthy Streets’ – safer, more attractive, accessible and people-friendly streets where everybody can enjoy spending time and being physically active.

RoSPA’s responses to the questions in this consultation are below.



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Question 1

To what extent do you agree or disagree that the amount a HGV driver can directly see through the cab's windows plays a role in collisions with vulnerable road users?

RoSPA's Response

RoSPA strongly agrees that the amount a HGV driver can directly see through the cab's windows plays a role in collisions with vulnerable road users.

Question 2

To what extent do you agree or disagree that the amount a driver can directly see should be improved to reduce HGV road risk?

RoSPA's Response

RoSPA strongly agrees that the amount a HGV driver can directly see through the cab's windows should be improved to reduce HGV road risk.

Question 3

To what extent do you agree or disagree with the proposed star rating boundaries for vehicles under the DVS scheme?

RoSPA's Response

RoSPA strongly agrees with the proposed star rating boundaries for vehicles under the DVS scheme.

Question 4

Do you have any comments on the DVS or how the ratings boundaries have been set?

RoSPA's Response

RoSPA has no further comments to make.

Question 5

To what extent do you agree with the proposals to introduce the proposed HGV safety standard permit scheme?

RoSPA's Response

RoSPA strongly agrees with the proposals to introduce the proposed HGV safety standard permit.

Question 6

To what extent do you agree with the proposals to introduce the proposed HGV Safety Standard Permit scheme even if it may make it more expensive for businesses to operate HGVs in London?

RoSPA's Response

RoSPA strongly agrees with the proposals to introduce the proposed HGV Safety Standard Permit scheme even if it may make it more expensive for businesses to operate HGVs in London.



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Question 7

To what extent do you agree or disagree that a DVS rating of one star should be set in 2020 as the minimum acceptable standard for HGVs to operate in London without further safety measures?

RoSPA's Response

RoSPA agrees that a DVS rating of one star should be set in 2020 as the minimum acceptable standard for HGVs to operate in London without further safety measures. However, as we stated in our response to TfL's previous consultation on the "[Direct Vision Standard](#)", we are not in a position to assess the practicalities for HGV operators of replacing their zero rated vehicles by 2020. If this date proves not to be viable, there may well have to be a bit of flexibility with the date.

It would not be desirable to see nearly-new HGVs replaced by LGVs below 3500 tonnes, which may have lower maintenance and driver training standards.

Question 8

To what extent do you agree or disagree that a DVS rating of three stars should be set in 2024 as the minimum acceptable standard for HGVs to operate in London without further safety measures?

RoSPA's Response

RoSPA agrees that a DVS rating of three stars should be set in 2024 as the minimum acceptable standard for HGVs to operate in London without further safety measures. The timetable of 2024 allows a period of several years and so provides considerable notice. But, as we stated in our response to TfL's previous consultation on the "[Direct Vision Standard](#)", we do not have sufficient information to judge the practicalities of the 2024 date for HGV operators.

Question 9

Should consideration be given to combining the Direct Vision Standard and 'safe system' so that the star ratings zero (poor) to five (excellent) relate to the overall safety of the vehicle?

RoSPA's Response

RoSPA believes that alternative safety measures based on the 'safe system' approach should be considered as mitigation for vehicles that are not able to meet the Direct Vision Standard. However, whether HGVs meet the Direct Vision Standard is measurable and quantifiable and so should be separate to the question of whether vehicles meet the permit requirement due to other safety measures, such as cameras, sensors, driver training.

Question 10

To what extent do you agree or disagree that HGVs not meeting the above minimum star requirements should be required to operate further safety measures to increase their safety?

RoSPA's Response

RoSPA believes that HGVs that do not meet the minimum star requirements should not be allowed to operate on London's roads. However, if they are permitted to do so, they should be required to have further safety measures to mitigate the risks caused by their failure to meet the minimum star requirements.



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Question 11

To what extent do you agree or disagree that such HGVs should be banned from operating in London if unable or unwilling to do so?

RoSPA's Response

RoSPA strongly agrees that HGVs that fail to meet the minimum star requirements, or alternative safety measures, should be banned from operating in London if the operator is unable or unwilling to meet the requirements.

Question 12

To what extent do you agree with the principles and way we propose to approach setting the 'safe system' of safety measures for HGVs failing to meet the minimum DVS star requirements?

RoSPA's Response

RoSPA agrees with the principles and proposed approach to setting the 'safe system' of safety measures for HGVs that fail to meet the minimum DVS star requirements.

Question 13

To what extent do you agree with the proposed measures (direct vision improvements, indirect vision systems, driver training, audible warnings etc) to be considered within the safe system?

RoSPA's Response

RoSPA strongly agrees with the proposed measures (direct vision improvements, indirect vision systems, driver training, audible warnings etc) to be considered within the safe system.

Question 14

Are there any more components that you suggest should be included within a safe system?

RoSPA's Response

RoSPA has no further suggestions for components that should be included within a safe system.

Question 15

Which body or organisation would best represent your views in identifying which measures would meet the 'safe system'?

RoSPA's Response

RoSPA believes that it would be sensible for Transport for London to be responsible for identifying which measures would meet the 'safe system', following appropriate consultations (such as this one) with stakeholders.



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Question 16

Do you support our proposal to enforce the DVS Scheme through a camera system that will read number plates and check against a list of permits that have been issued?

RoSPA's Response

RoSPA agrees with the proposal to enforce the DVS Scheme through a camera system that will read number plates and check against a list of permits that have been issued. This seems to be a practical approach, and one with which TfL have experience operating with the congestion scheme and low emission zones.

Question 17

Do you think that Direct Vision alone is enough or should it be considered as part of a wider package of measures to reduce HGV road danger?

RoSPA's Response

RoSPA believes that single initiatives are rarely more effective than initiatives that are an integrated part of a wider package of measures. Therefore, we think that the DVS scheme should form part of a wider package of measures. However, it should be clear whether or not vehicles meet the Direct Vision Standard itself.

Question 18

Do you have any further views on the proposals or suggestions for how the permit scheme should operate and be enforced to impose minimum safety requirements in 2020 and 2024?

RoSPA's Response

RoSPA have no further comments to make at this stage.

Question 19

We propose to implement the DVS Scheme by amending the London Lorry Control Scheme (LLCS) Traffic Regulation Order (TRO). This will enable civil enforcement London-wide by the issue of PCNs to operators/ hauliers (£550) and drivers (£130). Do you agree with this approach?

RoSPA's Response

Yes, RoSPA agrees with this approach.

Question 20

To receive a permit to operate in London, the “safe system” of the HGV will need to be tested and certified at a network of national testing centres. What do you consider the most important factors for TfL to consider when setting up this network?

RoSPA's Response

RoSPA considers that is important for TfL to consider all of the factors listed when setting up this network:

- Cost to operator
- Simplicity of test
- Time taken to complete test
- Testing available across UK and Europe
- Standards being tested are consistent with other tests
- Tester should be independent of TfL



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Question 21

We are producing an online 'look up' tool which produces DVS ratings once the height of the vehicle has been accurately measured. This tool will be used to 'look up' DVS ratings which will form part of the testing and certification. Vehicles will be added to the tool when they have been modelled. Do you agree with this approach?

RoSPA's Response

RoSPA supports this approach, provided the online 'look up' tool has been properly tested and its operation and results independently verified.

Question 22

Do you have any other comments on the DVS online 'look up' tool?

RoSPA's Response

RoSPA has no further comments to make.

Question 23

What is your name?

RoSPA's Response

Kevin Clinton, Head of Road safety, RoSPA.

Question 24

What is your email address?

RoSPA's Response

kclinton@rospa.com

Question 25

Please provide us with your postcode

RoSPA's Response

B15 1RP

Question 26

I am responding as:

RoSPA's Response

RoSPA is an accident prevention charity.

Question 27

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

RoSPA's Response

RoSPA



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Question 28

How did you find out about this consultation?

RoSPA's Response

Received an email from TfL and saw it on the TfL website.

Question 29

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.)?

RoSPA's Response

The information provided with the consultation was very good and detailed.

Question 30: Gender

Question 31: Ethnic Group

Question 32: Age

Question 33: Sexual Orientation

Question 34: Religious faith

Question 35: Are your day-to-day activities limited because of a health problem or disability

RoSPA's Response

As this response has been produced on behalf of RoSPA and in consultation with RoSPA's National Road safety Committee, these questions are not relevant.

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

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