



accidents don't have to happen

HGV Permit Safety Scheme- Making London's Lorries Safer

RoSPA's Response to the Transport for London's
Consultation Paper

Date: February 2019



Response to HGV Permit Safety Scheme: Making London's Lorries Safer, Transport for London

Introduction

This is the response of the Royal Society for the Prevention of Accidents (RoSPA) to the HGV Permit Safety Scheme: Making London's Lorries Safer consultation paper produced by Transport for London (TfL). It has been produced following consultation with RoSPA's National Road Safety Committee.

In September 2016, London's Mayor announced his intention to use the world's first Direct Vision Standard (DVS) to improve the safety of all road users, particularly vulnerable road users like pedestrians, cyclists and motorcyclists. Using a star system, the DVS rates HGVs from zero (lowest) to five (highest) stars, based on how much a driver can see directly through their HGV cab windows. The scheme would require all HGVs over 12 tonnes to hold a safety permit to enter or operate in Greater London.

TfL have now completed two rounds of consultation on the principles of a DVS and a proposal for a HGV safety permit scheme. TfL are seeking views on the final scheme proposals, including the process of obtaining a star rating, the safe system requirements, the permit application and administration process and the enforcement and appeals process.



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Question 1

To what extent do you agree or disagree with our proposed process for obtaining a vehicle star rating?

RoSPA Response

Strongly agree.

Question 2

To what extent do you agree or disagree with our proposals for the permit application process?

RoSPA Response

Strongly agree.

Question 3

To what extent do you agree or disagree with our proposed safe system mitigating measures - for example cameras and mirrors.

RoSPA Response

Strongly agree.

Question 4

To what extent do you agree or disagree with our proposals for how we enforce the scheme and how appeals will be dealt with?

RoSPA Response

Agree.



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Question 5

Do you have any further comments on our final scheme proposals?

RoSPA Response

RoSPA are supportive of the notion of the HGV permit safety scheme, including the Direct Vision Standard, vehicle star ratings and the safe system for vehicles that are not meeting the minimum star rating threshold.

The scheme is likely to be beneficial to safety. 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 their cab windows. Pedestrians and cyclists also feel safer in the knowledge that they have made eye contact with the HGV driver, confirming that the driver has seen them. These feelings of safety could in turn lead to increased levels of walking and cycling.

RoSPA agree that the first stage of applying for a permit should be for operators to check whether their vehicles are subject to the scheme. The proposed compliance checker tool should make this process quick and simple for operators. RoSPA also agree that if a vehicle is in scope of the scheme, the next step to obtaining a permit should be to identify the Direct Vision Standard star rating. The third stage of obtaining a permit is to apply for the permit via the online application portal. RoSPA agree with the proposed permit approval process for HGVs rated one to five stars and zero star or unrated HGVs. The functionality of the online application portal will allow operators to apply for multiple vehicle permits under a single application, which should make the process less time-consuming for operators. We are also pleased that permits will be free of charge to the operator.

RoSPA agree that operators should ensure that their vehicles are equipped with the appropriate mitigating measures including mirrors, cameras, sensor systems, audible vehicle manoeuvring warnings, warning stickers and side under-run protection where they do not meet the minimum Direct Vision Standard star rating threshold. RoSPA also agree that the star rating of a vehicle should never be increased due to the fitting of supplementary safety equipment. We are pleased that vehicles adhering to the progressive safe system will continue to be able to operate in London, as the life cycle of a truck is far longer than a conventional car and there are limited vehicles of a Euro 6 standard on the market.

Ideally, RoSPA would like to see driver training as a mandatory requirement, however, this may not be possible and enforceable in practice. Instead, RoSPA support the proposals of TfL to ask operators to demonstrate their system or plan in place to train all drivers in vulnerable road user safety and the use and limitations of supplementary safety equipment when applying for a permit. We agree that this should be required for all permit applications, including those for vehicles that meet the minimum Direct Vision Standard star rating.

RoSPA agree that the scheme should be fully enforceable, whereby the absence of a permit or a vehicle not operating in compliance with the conditions becomes an offence for which a penalty charge notice can be issued. We believe that it seems sensible for the scheme to be enforced by automatic number plate recognition, both fixed and mobile.

We agree that a HGV found to be in breach of the Permit Scheme should be issued a penalty charge notice of £550 for operators. However, RoSPA are unsure in which circumstances a driver will be issued a penalty charge, as they will have been assigned to the vehicle and route by the operator. As proposed, TfL should have the



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ability to revoke or suspend a HGV permit if the vehicle is found to be in breach of permit terms. These terms will need to be made very clear in the application process.

A Traffic Regulation Order should be implemented, allowing TfL to enforce penalties, as it is not feasible for the Police to be expected to enforce the scheme.

RoSPA has no comments to make on the consultation process, other than to thank 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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