



Response of the Road Haulage Association to the public consultation on HGV periodic testing and inspection exemptions.

The Road Haulage Association (RHA) is the trade and employers organisation for the hire-and-reward sector of the road haulage industry. The RHA represents some 6,000 companies throughout the UK, with around 100,000 HGVs and with fleet size and driver numbers varying from one through to thousands.

We welcome and support the government's initiative and intention to review and amend the current exemptions list for HGV classes detailed within the current exemption listing. These vehicles are clearly commercial vehicles and as such should meet the necessary road worthiness requirements as other road going vehicles on the grounds of road safety and a level business playing field.

Consultation Questions

Q1. We support the proposal for removing the exemption from roadworthiness testing for the ten categories of vehicles listed in paragraph 2.7 of the consultation; provided the vehicles concerned are based on standard HGV chassis configuration. These vehicles should meet standard roadworthiness requirements on the grounds of road safety.

Q2. No comment.

Q3 We are in full agreement with the proposal to remove the exemption in Regulation 44.1 for normal HGV and HGV- derived vehicles, which is fully supported by RHA specialist group members on the grounds of road safety.

Q4. We agree with the proposal based on the simple fact that this is an HGV vehicle, the only difference being that the vehicles load is permanently fixed to the cargo deck of the vehicle.

Q5. We have no adverse concerns with the costs and benefits detailed in the Impact Assessment.

Q6. Because all of the vehicles identified are based on a standard chassis configuration it would not be necessary to make or implement special arrangements for vehicle testing.

Q6a. Yes, because these vehicles are covered by the car testing scheme or are of a very specialist nature used for limited period.



Q7. The RHA would be happy to assist with further input and information going forward based on the points made in our response

B1. No comment

B2. Agree; current DVSA and ATF test lanes and brake roller testers would be unable to cater for these vehicles.

B3. That would be dependant up on weight and axle configuration, but we suspect alternative arrangements would be required.

B4. No comment

B5. Yes, provided the vehicle is based on a standard HGV chassis configuration, which the vast majority are.

B6. See our answer to B5.

B7. No comment

B8. Yes, there are many vehicles currently enjoying the status of engineering plant that are in fact HGV derived chassis with bolted on specialist equipment.

B8a. No, these vehicles are based on a standard 8x4 or 8x2 chassis used by the construction industry and will be able to meet testing requirements immediately.

B8b. See our response to B8a. There is no need for a transitional approach.

B9. Yes

B10. No comment

B11. Not that we are aware of.

B12. Not that we are aware of these vehicles are based on standard 8x4, 6x2 chassis configurations.

B13. Not that we are aware of. These are standard vehicles powered by battery power.

B14. Again standard vehicle configuration there would be no issues.

B15. No.

B16. No.



C1. Not if they are standard tractors – however it may be necessary to establish if current roller brake testers at DVSA and ATF outlets are capable of handling the braking effort produced by these vehicles.

D1. Not if they are standard tractor configurations.

Ray Engley

A handwritten signature in black ink, appearing to read "Ray Engley", written over a light grey grid background.

Head of Technical Services

11th March 2015