



Response of the Road Haulage Association to Transport for London.

Direct Vision Standard – Phase 2a consultation

23rd January 2018

Summary

1. Transport for London (TfL) and the London Mayor are consulting on the introduction of a HGV Safety Standard Permit scheme for all lorries of 12 tonnes entering London. Underpinning the scheme is a star rating system for the visibility a driver gets out of a lorries cab – called Direct Vision Standards.

Background about the RHA

2. The RHA is the leading trade association representing road haulage and distribution companies, which operate HGVs as profit centres. Our 7,000 members, operating near to 100,000 HGVs, range from single-truck firms to those with thousands of vehicles. These companies provide essential services on which the people and businesses of the UK depend.
3. We proactively encourage a spirit of entrepreneurship, compliance, profitability, safety and social responsibility. We do so through a range of advice, representation and services, including training.
4. We would like to thank Transport for London for the consultation and the opportunity to comment on the issues raised.

General Comments

5. The RHA and its members are active supporters of road safety and consider that every journey matters. We have many members operating in the London area, who will be severely and adversely impacted by these proposed measures.
6. We are very unsure about the effectiveness of claimed safety benefits.
7. The Mayor wants economic growth and construction in London. Almost 100% of everything made, or consumed in London is delivered by road freight.

8. We strongly disagree with parts of the consultation, key information is missing and we consider that answers have not been provided to the DVS consultation which closed in April 2017.
9. We consider that the Transport for London electronic consultation has questions and responses which do not deal with numerous, serious policy aspects which are being considered.
10. The RHA has expressed concern about the proposals. We do not believe separate regulatory rules for individual cities and separate permit schemes are appropriate. The RHA believes road safety vehicle standards need to be agreed at a national and international level.
- 11. The TfL impact assessment puts the cost to business at £640M to £690M for a safety system. The mitigation measures proposed are unclear, the method for authorising a permit is not known and the star rating of individual vehicles is also not known. Given this, we do not believe the costs can be considered robust, nor does the consultation meet the minimum acceptable standards of a genuine consultation.**
12. RHA members who have responded for the RHA call for evidence have expressed their anger at a scheme which has not been fully and properly thought through. This is evidenced by data and hyperlinks which fail to work, because documents, such as “tool kits” have been removed.

Response to the TfL Questions

The RHA responded to the main consultation questions to TfL as follows. We also completed the online survey. Our comments about the quality of the consultation are made in the Final Comments section at the end of this document.

Question: How [has] the Standard has developed since the Phase 1 consultation?

Answer: Little progress has been made. Few questions have been answered and many more questions have arisen following the Phase 1 consultation.

Question: [What are your views about] the Scheme proposal that in 2020 all HGVs entering or operating in London to be required to have a HGV safety standard permit?

Answer: This is too soon, has not been thought out and must not be implemented. Any DVS standard must be an international agreed standard, and implemented on an international or national level. Not a local standard created on a whim. Any standard

created on a local basis is unlikely to be fit for purpose and it will cost a great deal of money for little benefit. Such widespread retrospectivity is unacceptable for benefits which will not materialise. Parliament must create this legislation, not twelve, or more cities, each with their own individual standard.

Question: [What are your views about] the Scheme proposal to ban HGVs that are zero, one and two star in 2024 unless they can demonstrate operation of a safe system?

Answer: This must not be allowed to happen. Operators plan ahead and have business plans based on a twelve year life cycle of a vehicle. These vehicles cost up to £120K or more to purchase and the residual values of older vehicles are already plummeting, as they cannot be used in any city in the UK because of clean air zones. DVS will amplify this residual depreciation.

Question: [What are your views about] the process to establish what components should make up this safe system?

Answer: The components of a safe system must be agreed at international and national level, not at local level.

TfL Question: [What are your views about] our assessment of the impact of the scheme options considered, the proposed Scheme as identified in the IIA and your comments on them.

Answer: There is the very real danger highlighted in the Jacobs Cost and Business Impact Assessment that 3 star rated vehicles will be in short supply, cost more and that this may prove to be very costly to manufacturers (and operators). The same report highlights the consequence of plummeting residual values of 0 – 2 star vehicles.

TfL Question: What is your view on the HGV safety standard permit scheme proposal itself?

Answer: A permit scheme is not the solution. Urban Driver training, linked to DCPC and proper international standards (such as is done with Euro VI) is the way forward.

TfL Question: What is your view on the options to operate and enforce the Scheme?

Answer: This scheme must not be introduced until a national standard is created, with national enforcement by proper authorities, such as DVSA and Traffic Commissioners has been agreed by parliament.



Final Comments

13. The Jacobs Integrated Impact Assessment of the Direct Vision Standard at Table 1-2 (Summary of Option 5) shows a benefit cost ratio no higher than 0.140 - this BCR is negligible. It calls into question the real effectiveness of this scheme which needs greater analysis.
14. The RHA commented on the quality of the consultation in the online survey. We said **“This is the worst example of a consultation yet seen. Orwellian would be a good description. There are numerous biased questions with inadequate responses allowed in many cases. Questions 9 & 17 are prime examples of what seems to be an attempt to force consensus, to give answers in support of those asking the questions.**
The total proposal has massive gaps - there is a lack of essential information. There is poor evidence on the total costs and benefits. Even worse, the details of what is proposed, what vehicles are in which category is missing. No alternative road safety measures have been considered. There is no plausible inspection scheme outlined in the proposal.”
15. The Road Haulage Association on line response to the TfL DVS consultation can be viewed [here](#);

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