



4 March 2016

## **RHA response to Transport for London consultation on lorry door windows**

I write in response to your consultation on the question: **Do you support our aim of strengthening lorry safety by requiring the fitting of clear vision panels in passenger-side doors?**

The Road Haulage Association support moves in Brussels to consider how truck design can be made safer, not least in line with changes to permitted dimensions and we believe that Transport for London can make a significant contribution to that review. This review should consider whether the current requirements in relation to clear vision panels – windows – can be improved.

As with other measures, any changes should be based on sound evidence, analysis of the practicality, cost and the benefits in terms of road safety outcomes.

Based on the evidence currently available, the RHA and its members would be strongly opposed to a proposal that was done outside the framework of lorry legislation or required the retrofitting of an additional window in the passenger door, on the basis of very high cost and minimal benefit. The cost would be well above the estimated £1,000 per door, even before including the loss of use while the work is being done. The total cost would be likely to run to many tens of millions of pounds.

It is far from clear that the additional window would improve road safety outcomes. The area that would be seen through the window is already largely covered by the field of vision of the Class 5 mirror, which has recently been improved. The Class 6 can also give a view of the nearside corner of the cab. In terms of human factors, checking the new window would be likely to overburden the driver by giving him an additional task the driver had to perform, which we suspect would compromise safety.

It would be unfortunate indeed if cyclists were to get an impression that it was now safe to go up the inside of a truck.

Our members have stated many times that we will not see the extent of improvements to cyclists' safety that we all seek, while cyclists continue to ride up the inside of HGVs. We can quote the pro-cyclist blog:

"Isn't it dangerous?" This is the ultimate question regarding cycling in London...My standard reply to questions on cycling safety is: "Of course it's dangerous. As life is in general." I then explain that if you respect certain rules ("**Never ever get on the left side of lorry**" being the most important one), safety is not an issue. <http://cycling-intelligence.com/2011/03/16/cycling-in-london-how-dangerous-is-it/>



We note that London buses, which have glass to near-ground level, have been three times more likely per vehicle mile to be involved in a cyclist killed-or-serious-injury incident than HGVs (2012).

<https://www.london.gov.uk/press-releases/assembly/darren-johnson/buses-as-dangerous-as-lorries-for-cyclists>

There are practical considerations of detail that would need to be clarified. It is unclear to us what the specification of the additional window would be and, as part of that, the extent to which having a second person in the cab would interrupt the line of sight. Potentially, either the line of sight would be compromised or having a second person in the cab would not be allowed.

In addition, we understand that vehicle designers have concerns about the affect retrofitting could have on the strength of both the door and the cab; and on various mechanisms within the door and the wind-down function of the main window.

We support the search for constant improvement in road safety. We believe this requires a holistic approach, looking at infrastructure design, vehicle design, and awareness of (and attitude to) risk among all road users. TfL has mandated a number of modifications to lorries in London, the impact of which is unclear, and we anticipate a range of innovations, including technology to detect risks. We do not believe that the case for mandating an additional window in lorry doors is well made.

**Jack Semple**  
Director of Policy  
Road Haulage Association  
The Old Forge  
South Road  
Weybridge  
Surrey  
KT13 9DZ