



## **Response from the Road Haulage Association to Transport for London**

### **Direct Vision Standards - Survey Questions**

**7<sup>th</sup> April 2017**

#### **Direct Vision Standards – TfL Survey Questions**

The following is the Road Haulage Association's response to the survey questions that TfL have prepared for trade bodies who wish to respond to the proposal to ban all Heavy Goods Vehicles (over 12 tonnes) not meeting TfL's new London only Direct Vision Standards.

The web survey being run by TfL can be found at <https://consultations.tfl.gov.uk/>

#### **Notes on the survey**

Many of the questions in the online survey are multiple choice - with limited options about how to respond. Some questions do invite further comment. The RHA answers and comments we submitted in response to the survey are provided below.

None of the questions directly ask about costs but we have provided our views on cost impacts in a number of areas.

We have highlighted our concern that the process is flawed. The most significant flaw is that there is no guide as to what vehicles will be banned, and when – thus preventing any informed response. The survey almost completely ignores the issue of the ban for 1 and 2 star vehicles from 2024.

We are also very concerned that critical information has been kept away from stakeholders. TfL provided information at a public meeting that 188,000 HGVs that enter London each year are in scope of the DVS rules, that TfL estimate that 35,000 of these will be zero star rated and banned from 2019, and they estimate that half of the 188,000 HGV's will be banned in 2024. We consider it is unacceptable that this information was not disclosed in the survey information available to all stakeholders.

It is worth noting that the numbering below relates to the questions the RHA answered, that is the reason why many numbers are skipped in the response.



## **The RHA encourages our members to respond.**

The proposal will have a significant impact on anyone operating vehicles in London. Any goods vehicle over 12 tonnes that ever enters London will be subject to the Direct Vision Standards. The residual values of vehicles that will be banned by this will be impacted. Even operators not entering London can be affected. We urge members to respond to the survey.

The questions the RHA have answered are different from those that an operator will be asked to answer in the survey. Up to question 12, the questions are common. After that, operators are asked different questions. A list of all the questions operators are asked is available [here](#).

## **RHA responses to the survey questions.**

**1. to 4.** Questions 1 to 4 are simply where we identify the RHA as the respondent.

**5. To what extent to you agree or disagree that adopting a Direct Vision Standard (DVS) for HGVs (Heavy Goods Vehicles) has the potential to improve HGV and vulnerable road user safety?**

RHA Response: Neither agree/disagree

**6. To what extent do you agree that HGVs with the least direct visibility and therefore a 'zero' DVS rating should be banned from London's streets by January 2020? (More detail on this proposal will be subject to further consultation later in 2017)**

RHA Response: Strongly disagree.

**7. To what extent do you agree that only HGVs with a 'good' direct visibility or 'three star' DVS rating and above should be allowed on London's streets by 2024? (More detail on this proposal will be subject to further consultation later in 2017)**

RHA Response: Strongly disagree



**8. Do you think that the DVS star rating should be displayed on the vehicle?**

RHA Response: No

**9. Do you have any other comments about our current plans to use the DVS to improve HGV safety?**

RHA Response: The DVS plans are poorly thought through, with a narrow focus on one solution.

There is an absence of alternatives, the 1 option presented is looked at as if there are no other interventions that can be used to improve the safety of vulnerable road users. This is very poor decision making.

There are many other measures that will improve road safety - these have been ignored.

No consideration has been given to the cost that will be borne by road operators or how those costs will be passed on to the residents and businesses of London. This is important because other alternatives may be possible that could yield better outcomes at lower cost.

We feel there is inadequate recognition that blind spots will not be eliminated, that technology is playing a part and that the benefit of what is proposed is limited.

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

RHA Response: The Road Haulage Association

**11. Are you responding as: (multiple choice):**

RHA Response: A part of the freight industry.

**12. Please indicate which part of the freight industry you are from.**

RHA Response: Trade Body

**15. Who do you think should be responsible for producing the DVS star ratings for HGVs?**



# The Road Haulage Association

RHA Response: Other (please specify).

Note, no option to specify anything was provided. The RHA is not convinced the case has been made for DVS restrictions.

## **16. Please provide any further comments on the more detailed principles and/or technical aspects of the DVS as developed to date.**

RHA Response: The detailed principals and technical case has been done in isolation from other potential policy initiatives. This is totally unsatisfactory.

It has failed to take into account the limited benefit of the extra visibility, focusing on how visibility is improved as an abstract benefit in itself - in total isolation from the real world impact. There is no assessment on how many of the known specific incidents could have been avoided with DVS.

It is a disgrace that responders to this survey do not know if the vehicles they operate will be impacted by the DVS and banned. Operators are buying vehicles today and they risk having these new ultra-low emission vehicles banned.

No alternatives are explored against which the proposal can be judged.

## **17. Are you already taking specific action within your business to tackle HGV and vulnerable road user safety?**

RHA Response: Yes

RHA Comment: Our members take a range of action according to what is appropriate for them, including all those on your list.

In addition many actively train drivers on how to drive to help accommodate VRU's when active. Members support outreach work that highlights to cyclists the hazards of riding when in proximity with lorries. Warning signs are used routinely on most goods vehicles.

We are aware of the industry working, with vehicle makers, on developing improved sensor technology for HGVs.

Some operators have started to enhance the left turn signalling by putting additional indicator repeaters on the left hand side.

**18. Do you have any further comments on the effectiveness of existing HGV and vulnerable road user safety measures?**

RHA Response: Road safety is everyone's responsibility.

Existing actions have made a difference and will continue to do so. But there are gaps where action needs to be taken.

Training of drivers does take place and should be, and will be, further encouraged.

The training of cyclists is an area where there should be much more attention. Ensuring cyclists understand the risks, how to avoid danger and how best to use the infrastructure safely would be a great assistance.

Cyclist visibility is something many cyclists do well, but there is a massive amount of poor practice that needs to be addressed. It may make sense to have minimum visibility standards for cycling on the road in London, backed up with a degree of enforcement.

Infrastructure needs to work effectively to help people keep themselves safe and to put all road users in the best positions to be safe. Our members have noticed that advance stopping at lights sometimes works poorly because cyclists line up on the left rather than enter the advance stopping area (maybe there is a training issue).

There is a lack of consideration of the impact of infrastructure works on road users safety. Rightly, the safety of workers is a priority, but so should the safety of road users - this is not always the case.

Finally, potholes and road condition is not given the priority it should have given the critical impact that road condition plays in road safety. Poor road surfaces lead to accidents, current road condition is not good enough, more attention is required.

**19. Do you think any of your HGVs will be affected by the 'zero star' ban in 2020?**

RHA Response: Yes

RHA Comment: TfL have advised, orally in a meeting, that of the 188,000 lorries that are in scope of the DVS plan and that 35,000 will be banned by the "Zero star" rating.

**20. Have you started to consider making changes within your business to prepare for any future DVS scheme?**

RHA Response: Yes

RHA Comment: We are aware that members have delayed purchases of new Euro VI vehicles as they cannot be sure that any new vehicles they buy will not be banned by the implementation of the DVS.

**21. How easy do you think it will be for your operation to comply with the ban on zero star vehicles in 2020?**

RHA Response: Very difficult

RHA Comment: Not knowing which current vehicles will be zero star rated makes it impossible for many of our members to make any rational decisions on how to accommodate the DVS in their fleet.

For small businesses in particular, they may not be able to afford to replace current vehicles with new ones that meet the 3 star standard (any replacement will need to be 3 stars as DVS plans to ban 1 and 2 star vehicles by 2024).

Cost of vehicle replacement is a major issue, if the benefits are sufficient the Mayor should agree to buy back all zero star rated Euro VI vehicles.

The operating cost and capital cost of some of the new types of DVS compliant vehicles is higher - financial support to help SME's to purchase and operate replacement vehicles should also be put in place.

**22. Do you think the proposed ban on 'zero star' rated HGVs will impact your business, members or operation?**

RHA Response: Yes.

RHA Comment: Many businesses will incur additional cost. These include the purchase of new vehicles, the accelerated depreciation of existing vehicles, higher operating costs for some due to vehicle design and extra journeys needed with increased numbers of lower capacity compliant vehicles replacing higher capacity non-compliant vehicles.

**23. Do you believe you will need to replace any of your vehicles to meet the new ULEZ Euro VI requirements?**

RHA Response: Yes.

RHA Comment: Given the absence of detail provided there is no possible way for most members to accurately answer this question with a proportion of vehicles that will need to be addressed.

**24. To what extent do you agree that the geographical boundary of the proposed ULEZ and DVS schemes should be the same?**

Neither agree or disagree

**25. Do you have any further comments on alignment of schemes affecting HGV operators in London?**

RHA Response: The alignment of schemes in London is appalling.

It sometimes appears to our members that the many schemes requiring compliance compete with each other to make life as difficult and bureaucratic for operators as possible.

National and international standards already exist in many areas (Operator licensing, driver standards, roadworthiness, vehicle design), then we have London imposing new and randomly timed additional standards on top of these.

FORS (always changing), CLOCS (always changing), London Lorry Control Scheme (under review now), ULEZ (being brought forward & changing) and now the DVS (new initiative) are all examples of initiatives where compliance from the sector is demanded by the London authorities. Each one with separate detailed rules, some with direct financial penalties attached.

**26. What further issues, not covered in the questions above, do you believe need to be considered in terms of implementing the DVS scheme and its likely impacts on you or your business?**

RHA Response: Alternatives need to be considered. The cost of introducing this, with no evident understanding if this is the best, most cost effective, way to improve road safety,

means that this survey is wholly inadequate. The “consultation” appears to have started with a solution (banning many lorries) and seeks to find ways to support that simplistic idea.

Other road safety measures should be evaluated. These could include visibility standards for cyclists, training for HGV drivers and cyclists, a road maintenance programme to eliminate the most dangerous road defects, better roadworks initiatives and many other actions.

Impacts, especially on SME's, will be dreadful. A compensation scheme and a scheme to provide support for investment by the Mayor needs to be considered.

The “consultation” is incomplete in that it only deals with the zero star part of the DVS programme. The 1 and 2 star banning from 2024 is not raised properly, the impact it will have is not dealt with. DVS, according to TfL, will ban half of 188,000 HGV's that enter London each year from 2024. That key information is missing. It calls into question what other information TfL has that they are not sharing with the public and stakeholders.

The issue of non-UK vehicles is ignored in this survey. How will a left hand drive lorry be rated? Given that the visibility on the left hand side is unobscured, will all left hand drive vehicles be 5 star? What arrangements will be put in place to ensure that non-UK vehicles will be required to comply?

No consideration has been given on the likely move towards 12 tonne goods vehicles that are out of scope of the scheme. Some operators will use more, smaller vehicles to beat the restrictions – adding to congestion and pollution.

**51. 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.)?**

RHA Response: Very poor

RHA Comment: We selected very poor in the multiple choice response, but that really is not a strong enough response. Appalling would be more accurate.

This "consultation" is not adequate as essential information needed to make informed comment is missing. Much of the supporting material is seen as detailed propaganda aimed at supporting the planned introduction of the DVS, and nothing else.

Basic, simple easy to understand information - such as what star rating each lorry subject to this has - is not available. TfL had done work to understand the proportion of vehicles that





# The Road Haulage Association

will be impacted by DVS and has not shared this with stakeholders in any of the information provided – it should have been made public by TfL in the documents. This non-disclosure of key information could be seen to undermine the credibility of the process and raises questions about other information that make have not been disclosed.

Other basic questions have not been addressed that are needed to inform people. How much will it cost? Will this reduce road deaths and injuries, if so, how many? Will this lead to more traffic on the road? Will it increase pollution and reduce air quality? What is the impact on small businesses? Are there other initiatives that would achieve better road safety outcomes at lower cost?

RHA does not believe that the case to introduce DVS has been made.

## **Background - about the Road Haulage Association**

The Road Haulage Association is the leading trade association representing road haulage and distribution companies who commercially operate HGVs. Our 7,000 members operate near to 100,000 HGVs nationally and internationally. Companies range in size from those working with a single truck to those with thousands of vehicles.

Largely taken for granted, these companies provide an essential service on which the people and businesses of the UK depend. The food we eat, the clothes we wear, the houses we live in and the places where we work all depend upon road haulage working to get goods to where they need to be.

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