

# Direct Vision Standards

Response to issues raised  
November 2017

# Consultation Summary

## Background

Between 24 January and 18 April 2017, we consulted on proposals to introduce a Direct Vision Standard for HGVs in London. This forms part of the Mayor's commitment to reduce road danger through the adoption of a 'Vision Zero' approach.

## Conclusion and next steps

We received 892 responses to the consultation through the consultation portal and a number of separate responses from stakeholders which were received via email.

Of the responses received via the consultation portal, 84% of all respondents said they agreed or strongly agreed that adopting a DVS for HGVs has the potential to improve HGV safety and vulnerable road user safety. 78% of consultation portal respondents either agreed or strongly agreed that HGVs with the least direct visibility (zero rating) should be banned from London's streets by January 2020 and 78% either agreed or strongly agreed that only HGVs with a 'good' direct visibility or 'three star' DVS rating and above should be allowed on London's streets by 2024.

We have developed a Direct Vision Standard (DVS) which rates vehicles from zero (poor) to five (excellent) based on the amount of direct vision from the HGV cab. The DVS and star ratings can be viewed here (insert hyperlink). These are interim ratings which are the subject of further consultation as part of our proposals to introduce a phased HGV Safety Standard Permit Scheme. You can read more about these DVS proposals have your say about these here (insert hyperlink).

## Response to issues commonly raised

### Implementation

#### **DVS implementation timescales should be more ambitious**

As a world-first, the DVS and the proposal to ban or restrict the most dangerous, zero star lorries from the Capital by 2020 requires us to consult fully with all stakeholders and design the most effective scheme for reducing collisions and protecting vulnerable road users. The need to ensure the DVS is measured objectively and fairly, and understood by manufacturers has been considered as well as issues affecting operators including timescales for ordering and renewing new HGVs. We must also notify the relevant regulatory bodies throughout the process and have had to factor this into the proposed DVS implementation timeline.

#### **DVS implementation timings are too ambitious – a phased approach should be considered**

Having listened to feedback from the first phase of consultation, we will now consult on a phased HGV Safety Standard Permit Scheme. Under the proposals, HGVs rated zero star under the Direct Vision Standard are able to adopt other measures to reduce risk as part of a 'safe system' approach to improve the overall safety of their vehicle. If the vehicle reaches the required safety standards, it would be given a permit to enter the Capital. This permit scheme gives operators time to improve the overall safety standard of their vehicles.

#### **Is the DVS robust and consistent?**

The HGV DVS rating system is underpinned by a body of independent research conducted over four years 2013-2017. (Please see: <https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/safer-trucks> for more information). This includes studies by Leeds University, Loughborough University and Transport Research Laboratory. To further support the robustness of HGV DVS we have continued to involve the independent automotive approval authorities and the vehicle manufacturing industry in development of the DVS and measurement and rating process.

#### **Clarity of DVS star ratings required**

During Phase 2a we will consult on the method by which we set the DVS star rating boundaries. Confirmed star ratings will be published after this phase of consultation.

#### **DVS should be a national scheme**

We believe the DVS should be set at a European and National level within the regulations governing the design and safety of HGVs. However, this is not currently a priority for the DfT, and there is a particular problem in London with HGV and vulnerable road user safety. We are confident there are no other cities in the world working on a DVS for HGVs but to further reduce the risk of competing standards, we have and will continue to involve manufacturers, the

DfT and the European Commission and the United Nations Economic Commission for Europe (UNECE) with the aim of influencing the regulations.

### **Rating body should be independent of HGV manufacturers and operators**

Loughborough University Design School have developed the ratings for the Euro VI HGVS and will be doing the same for older vehicles. We will continue to facilitate HGV safety 'Expert Panel' meetings. These meetings are attended by manufacturers, independent test houses, experts and regulators. This process and protocol will be clearly documented in the full technical report by Loughborough [insert link]. TfL is considering options for setting up a framework of independent rating assessors to carry out ratings in future and / or be able to audit manufacturers' application of the process.

### **Independent monitoring and validation of DVS**

We are using the 'Expert Panel' and a series of technical sub-group meetings to ensure the process by which DVS ratings are measured and applied is fully understood objectively and applied fairly by manufacturers and other bodies for new vehicles as they are sold and developed and older vehicles which are already in operation.

As part of the next phase of the project and informed by the Phase 2a consultation, we will be exploring implementation options, including the requirements for certification of vehicles meeting the DVS standards with the detail included in the updated Integrated Impact Assessment of the final scheme.

### **Concerns about availability of compliant vehicles**

Our proposal anticipates that most, if not all, vehicles with a poor DVS rating can continue to operate in London if they can prove other safety measures that reduce the overall risk of the vehicle. The Scheme we are consulting on in Autumn 2017 would use DVS ratings to identify vehicles of higher risk due to poor direct vision. It seeks to ban or restrict those vehicles that cannot demonstrate application of appropriate other safety mitigation measures as part of a "safe system" view of all aspects of HGV risk. Our consultation seeks views on what those appropriate safety measures should be.

### **Complying with DVS and ULEZ?**

We're working to align the DVS and the ULEZ schemes. HGV operators considering upgrading their fleets to meet the ULEZ emission standards should consider vehicles with a high DVS star rating. Where this is not possible for operational or other reasons, or if a vehicle has already been purchased for ULEZ compliance, we anticipate that most, if not all, will be able to retrofit their vehicle to improve the level of overall safety.

## **Alternatives**

### **Promote use of visual aids and cameras etc**

Following vision zero principles in the Mayor's Transport Strategy; we are setting the ambition wider than just looking at Direct Vision to develop a comprehensive 'safe system' approach to HGV safety.

We commend the good work achieved through the CLOCS, FORS and other industry-led programmes and safety initiatives. We intend to use these and the experience of the use of cameras, sensors and other visual aids as a platform to build upon in development of the 'safe system' where it is not possible to improve direct vision from existing vehicles.

## **Legislation**

### **Only allow HGVs with 3 star rating or above from entering London**

To comply with current EU law the scheme we develop needs to be a proportionate response to the safety problem.

HGVs play a valuable role in delivering good and services to the capital. The DVS star ratings have been set in a way that is most valuable to road danger reduction. However, this means a large majority of HGVs would not currently reach a three star rating, meaning it would not be practical to ban three star HGVs from 2020. Industry must be given time adapt and improve their fleets and by including additional measures beyond direct vision within the 'safe system'; we believe our current proposals will enhance HGV safety ahead of 2020.

### **Only allow HGVs with a 5 star rating or above**

\*See above

## **Financial**

### **What about impacts on industry and the economy?**

Full consideration has been given to the potential economic and business impact of the DVS as part of the IIA which can be found at [tfl.gov.uk/direct-vision-standard](http://tfl.gov.uk/direct-vision-standard) as part of the full policy consultation. The IIA findings and supporting methodology is being consulted upon.

### **Smaller operators unable to comply will be forced out of business**

As part of the IIA, we have interviewed small operators to inform our assessment of potential impacts and issues faced by this group of stakeholders. This information has been used to help the development of the current DVS proposals within the consultation

## **Safety**

### **Will the introduction of DVS improve safety?**

In London, HGVs are overrepresented in fatal collisions with vulnerable road users such as cyclists and pedestrians. HGVs make up less than four per cent

of the miles driven in London, but were involved in 78 per cent of cyclist fatalities and 20 per cent of pedestrian fatalities in 2015. HGV blind spots are a major contributory factor in these fatal collisions involving cyclists and pedestrians. The DVS is intended to help address this and improve safety for all road users.

We have produced an IIA as part of the next phase of consultation which looks at how many killed and seriously injured collisions will be avoided as a result of the introduction of a DVS and our proposals for a HGV Safety Standard Permit Scheme.

## **Other**

### **Require tougher controls on cyclist behaviour**

Some respondents expressed concern about cyclist behaviour. We acknowledge concerns raised about cyclist behaviour, although our research shows that most cyclists ride responsibly, and that cyclists are no more likely to disobey road rules than other road users.

We promote adherence to the Highway Code by all road users and encourage 'responsible cycling' and mutual respect between cyclists and other road users. We work to eliminate offences such as jumping red lights, cycling on the pavement and cycling at night without lights. We do this using police enforcement and educational programmes, as well as marketing and engagement campaigns.

We recognise that some pavement cyclists break the law (sometimes to avoid the dangers of motor traffic). However, we anticipate that providing dedicated facilities for cyclists will discourage people from riding on pavements.

We contribute funding towards the Metropolitan Police's Cycle Safety Team and are working on a strategic enforcement plan, taking into account all activities. The Cycle Safety Team will patrol all new Cycle Superhighways when they open, encouraging appropriate behaviour by all road users and enforcing compliance.

### **Cyclists to be licenced**

This is outside our remit as a Transport Authority.

### **Construction of segregated cycling facilities**

Safety, or the perception of safety, is often the main barrier to cycling. The Cycle Superhighway infrastructure – with separation from other road users in time and space on both links and at junctions – addresses this. The new Cycle Superhighways will provide clear and convenient routes through London for cyclists, physically separated from other vehicles. They have been designed to encourage the large numbers of people who would like to cycle, but currently feel unable to cycle. These proposals are the most ambitious of their kind for improving cycling infrastructure in London and the UK.

Our Better Junctions programme is improving safety for cyclists passing through major junctions. Our planned network of Quietways will follow quieter, low-traffic routes, providing an environment for those cyclists who want to travel at a gentler pace. Along with the Cycle Superhighways, this network will complement other cycling initiatives such as the Central London Cycling Grid and Mini-Hollands.

### **Lorry driver education for sharing the road with cyclists should be improved**

We continue to develop and deliver funded training and has built a suite of knowledge and skills training including FORS Practitioner, a series of ten workshops – each 3.5 hours duration creating a learning journey for Freight managers toward Safe, Green and Efficient Fleet Management.

Safe Urban Driving (SUD) is a DCPC training modular course for commercial freight drivers which focuses on the risks and hazards of driving heavy goods vehicles (HGVs) in UK cities. The course equips drivers with the knowledge and skills needed to share the road safely with vulnerable road users, in particular pedestrians, cyclists and motorcyclists. SUD is the only course to include on-cycle hazard awareness training allowing drivers to see the road from a cyclist's perspective and improve their understanding of the issues faced by cyclists.

We support boroughs to run these courses along the Cycle Superhighways. To date, over 18,000 drivers have attended the Safe Urban Driving course. We support SUD for fleet operators participating in the Fleet Operator Recognition Scheme and for London Boroughs. Workshops are held throughout the UK to prepare drivers entering London for changes in the city streetscape to safeguard vulnerable road users.

### **Raising vulnerable road user self awareness**

We work with the partners including the DfT and Local Authorities to provide training for cyclists to improve their confidence, skills and awareness.

Bikeability is a Government recognised cycle training scheme. There are three Bikeability levels, each designed to improve cycling skills, no matter what is known already. Levels 1, 2 and 3 take trainees from the basics of balance and control, all the way to planning and making an independent journey on busier roads.

### **Ban HGVs on main cycling routes during peak hours**

London's continued success relies on safe, reliable, sustainable and efficient goods delivery and servicing – it is essential that London's businesses are able to receive the goods and services they need.

We are working to reduce the number of HGVs on the streets through our retiming and consolidation programmes.

The Mayor, through TfL, has also committed to work with Network Rail and the Port of London Authority to move, where practicable, freight off London's streets and on to the rail network and the river Thames.