

Further proposals for a Direct Vision Standard and HGV Safety Permit

Consultation report
April 2019

Contents

1. Executive Summary 1

2. About the respondents 8

3. Summary of all consultation responses..... 10

4 Responses from stakeholders 25

5. Next steps 44

Appendix A – Press advertisement 45

Appendix B – List of stakeholders consulted..... 46

Appendix C – Stakeholder email 52

Executive Summary

This document explains the process and responses to the consultation on the following scheme: final proposals for a Direct Vision Standard and Heavy Goods Vehicle (HGV) Safety Permit Scheme for London.

Between 8 January 2019 and 18 February 2019, we consulted on the final scheme proposals including the permit application process, safe system requirements and enforcement of the scheme. Feedback from this phase of consultation is now being used to refine the final scheme ahead of the statutory consultation (Phase 2c) in April 2019. This consultation was the third consultation on the Direct Vision Standard and the principles of an HGV Safety Permit.

We received 280 responses to this consultation, which included 47 stakeholder responses. The responses were overall in favour of the proposals as presented. A total of 61 per cent of respondents either agreed or strongly agreed with our proposed process for obtaining a vehicle star rating. A total of 60 per cent of respondents either strongly agreed or agreed with our permit application process proposals. 67 per cent of the total respondents stated either strongly agree or agree with our proposed safe system mitigating measures (including cameras and mirrors). Our plans for how to enforce the scheme and deal with appeals were strongly agreed or agreed with by 57 per cent of respondents.

A more detailed analysis of the results is shown in the following chapters of this report. This includes our open question regarding further comments on the scheme. We have also published our responses to the main issues raised through this report in a separate 'Response to Issues Raised'.

Next steps

We have reviewed and fully considered all of the feedback received as part of this consultation.

We are now holding the Phase 2c statutory consultation on the final scheme proposals and the Traffic Regulation Order (TRO) that will be used to implement the scheme.

Subject to the successful application for the TRO we plan to make permits for the scheme available in October 2019 and begin enforcement of the scheme in October 2020.

1. About the proposals

1.1 Introduction

On 30 September 2016 the Mayor announced his intention to use the world's first Direct Vision Standard (DVS) for Heavy Goods Vehicles (HGVs) to improve the safety of all road users, particularly vulnerable road users like pedestrians, cyclists and motorcyclists.

Our research shows that between 2015 and 2017, HGVs were disproportionately involved in fatal collisions with cyclists (63 per cent) and pedestrians (25 per cent) on London's streets, despite only making up four per cent of the overall miles driven in the Capital.

The DVS forms part of the Mayor's Vision Zero approach to eliminating deaths and serious injuries from London's roads by 2041. Using a star system, the DVS rates HGVs from zero (lowest) to five (highest) stars, based on how much a driver can see directly through their HGV cab windows.

1.2 Purpose

We completed two rounds of consultation in 2016 and 2018, firstly on the principles of a DVS and then a proposal for an HGV Safety Permit Scheme. Listening to feedback from these consultations and working closely with industry and stakeholders, we further developed the scheme. The Consultation Reports and Responses to Issues Raised documents from these consultations are available on our consultation website and are linked further down in this report.

During this consultation, we sought views on our final scheme proposals with a particular focus on the HGV Safety Permit processes. This included the process for obtaining a vehicle star rating, the safe system requirements, the permit application and administration process, and the enforcement and appeals process.

The proposed scheme would require all HGVs over 12 tonnes to hold a Safety Permit to enter or operate in Greater London. As part of DVS, HGVs will be rated between 'zero-star' (lowest) and 'five-star' (highest). From October 2020, zero star HGVs would be banned unless they can demonstrate they operate in compliance with other measures in a defined safe system to minimise their risk to pedestrians and cyclists.

By 2024, zero, one and two star HGVs would be banned unless they can demonstrate compliance with an updated progressive safe system. The proposed safe system includes specific industry recognised mitigating measures such as sensors, camera systems and visual warnings. The safety system would evolve over time, and be reviewed in 2024 to consider advances in technology.

We plan to make permits for the scheme available from October 2019.

2. About the consultation

2.1 Purpose

The objectives of the Phase 2b consultation were:

- To give stakeholders and the public easily understood information about the proposals and allow them to respond
- To understand the level of support or opposition for the change/s and the proposals
- To understand any issues that might affect the proposal of which we were not previously aware
- To understand concerns
- To allow respondents to make suggestions

2.2 Outcome of the consultation

Following careful consideration of the consultation responses, we made some amendments to our proposals.

Key changes in response to the consultation include:

- **Safe System** – we have provided clearer guidance on the requirements for the safe system mitigating measures
- **Progressive Safe System** – we have committed to consulting on the progressive safe system in 2022 ahead of its introduction in 2024
- **Driver Training** – we have clarified that driver training, while highly recommended is not a mandatory requirement for obtaining a permit. A list of providers of will be included on the permit application portal
- **HGV Safety Permit** – for HGVs that meet the minimum DVS star rating (one star in 2020) Permits will be issued automatically once the online application has been completed. During the pre-compliance year (October 2019 – October 2020) Permits for HGVs that are required to fit the safe system will be issued within 28 days following approval of the safe system evidence pack. Once enforcement of the scheme begins in October 2020, the turn-around period will be shortened and a system put in place for expedited applications. Further details on this will be communicated later this year. We have also provided details on the appeals process where a permit application is refused.
- **Enforcement** – we have provided further guidance on the enforcement process for the scheme
- **Appeals Process** – we have provided details on the appeals process regarding any Penalty Charge Notice issued under the Scheme

Our conclusion and next steps are set out in Chapter 5.

2.3 Consultation history

A phased consultation approach has been taken at key stages of the development of the proposals to allow stakeholder feedback to shape the final scheme:

Phase 1 (January to April 2017) – we set out the case for HGV driver direct vision and consulted on the Mayor’s outline proposals to introduce a DVS for HGVs in London and the principles of the Standard itself. We considered all of the responses and a full analysis can be found in the [Consultation Report](#) and the [Responses to Issues Raised](#) on our website. The responses showed that, in general, there is support for the principle of a DVS.

Phase 2a – Policy consultation (16 November 2017 to 24 January 2018) – we outlined how we set the proposed DVS star rating boundaries and the process by which different options for implementation were assessed and used to develop the preferred HGV Safety Permit Scheme. We considered all of the responses and a full analysis can be found in the [Consultation Report](#) and the [Responses to Issues Raised](#) on our website. The responses showed support for the proposed Permit Scheme approach.

Phase 2b (this consultation) – Final scheme proposals (8 January 2019 to 18 February 2019) – this consultation was focussed on the final HGV Safety Permit Scheme proposals including permit application process, safe system requirements and enforcement of the scheme. Feedback from this phase of consultation has now been used to refine the final scheme ahead of the statutory consultation (Phase 2c).

2.4 Who we consulted

The consultation was open to all. Details of the scheme were available to view on our consultation portal at www.tfl.gov.uk/direct-vision-standard.

We also wrote to a number of stakeholders to directly to seek their views, including the London Boroughs and freight organisations. Please refer to Appendix B for a full stakeholder list and Appendix C for a copy of the stakeholder email.

2.5 Dates and duration

The consultation was open for six weeks from 8 January until 18 February 2019.

2.6 What we asked

We asked five questions seeking feedback on the specific proposals. Four of these were closed questions asking for the level to which respondents agreed or disagreed with our proposals. The fifth question was an open question to capture more detailed views.

1. To what extent do you agree or disagree with our proposed process for obtaining a vehicle star rating?
Strongly agree

Agree
Neither agree or disagree
Disagree
Strongly disagree

2. To what extent do you agree or disagree with our proposals for the permit application process?

Strongly agree
Agree
Neither agree or disagree
Disagree
Strongly disagree

3. To what extent do you agree or disagree with our proposals for the evidence based requirements of the 'safe system'?

Strongly agree
Agree
Neither agree or disagree
Disagree
Strongly disagree

4. To what extent do you agree or disagree with our proposals for how we enforce the scheme and how appeals will be dealt with?

Strongly agree
Agree
Neither agree or disagree
Disagree
Strongly disagree

5. Do you have any further comments on our final scheme proposals?

Open question

We also asked 13 additional questions relating to the respondent for monitoring purposes including equality information. These were:

- Name
- Age
- Gender
- Email Address
- Postcode
- What the respondent was (i.e. a member of the public or part of the freight industry)
- Organisation name (if responding on behalf of a stakeholder/organisation)
- Ethnic origin
- Sexual orientation
- Religious faith
- Whether the respondent had a health problem or disability which limited their day to day activities, how they had heard about the consultation

- Views on the quality of the consultation (respondents were asked two questions on the quality: to rate in a scale from very good to very poor; and to provide any comments)
- How they found out about this consultation

2.7 Methods of responding

People were invited to respond to the consultation using a variety of methods. They could respond via our online consultation questionnaire, by writing to our freepost address (FREEPOST TFL CONSULTATIONS) or by emailing consultations@tfl.gov.uk.

2.8 Consultation materials and publicity

2.8.1 Website

The consultation information and questions were available on our consultation website www.tfl.gov.uk/direct-vision-standard

2.8.2 Emails to the public and stakeholders

Ahead of the launch of the consultation, we sent emails to stakeholders including local authorities, manufacturers, freight organisations and vulnerable road user groups. We also offered and held meetings and presentations to discuss the proposals in further detail.

At the launch of the consultation we also sent emails to a wider range of contacts, stakeholders and subscribers of our freight bulletin. Details of the proposals and a link to our online consultation portal were included in the email.

A copy of the stakeholder email can be found at Appendix C.

2.8.3 Press and media activity

To raise awareness of the consultation, we issued a press release which was also featured on the TfL main website.

We also advertised in a number of pan-London and trade titles, as well as website advertising. Please refer to Appendix A for a copy of our press advert.

2.8.4 Events

We held an event for stakeholders on 1 February 2019 from 9am until 10.30am at Palestra, 197 Blackfriars Road, Southwark. A presentation about our proposal was delivered and hard copies of feedback forms could be filled in and returned. There was also a question and answer session.

The slides presented at the event can be found as Appendix D.

2.8.5 Meetings with stakeholders

Regular meetings with stakeholders have been held during and following all previous phases of consultation.

2.9 Analysis of consultation responses

We appointed an independent consultancy to undertake much of the analysis work on our behalf. This included all of the analysis for the general public and stakeholders including closed and open questions.

A coding frame was developed to analyse responses to question five, which was an open question. This was broken down into themes.

The consultancy also reviewed all of the stakeholder responses and provided summaries. This analysis can be reviewed in section 4.2.

3 About the respondents

This section provides information about the consultation respondents, including how they heard about the consultation and in what capacity they responded e.g. as an HGV operator.

3.1 Number of respondents

Respondent type	Total	%
Member of the public	233	83%
Stakeholder	47	17%
Total	280	100%

All below questions are shown by total (all respondents including stakeholders) and members of the public (excluding stakeholders).

3.2 How respondents heard about the consultation

224 out of 280 respondents answered this question. The majority heard about the consultation via social media, with an email from us the second most common source.

How respondents heard	Total	%
Social media	75	27%
Received an email from TfL	54	19%
Read about it in the press	31	11%
Saw it on the TfL website	22	8%
Other	42	15%
Not Answered	56	20%
Total	280	100%

3.3 Methods of responding

We have included stakeholder responses as well as those from members of the public in the below table. The majority of respondents submitted their views via our website.

Methods of responding	Total	%
Website – online questionnaire	244	87%
Email/letter	36	13%
Total	280	100%

3.4 Respondent type

268 out of 280 respondents answered this question.

Respondents were asked to state which of the following respondent types best described them. Respondents were most commonly members of the public, followed by HGV operators.

Respondent type	Total	
	Count	%
A member of the public	129	46%
An HGV operator	41	15%
An HGV driver	13	5%
A business	12	4%
Part of the freight industry	9	3%
A business that employs HGV operators	6	2%
An HGV manufacturer, dealer, body builder or other involved in the manufacture or supply of vehicles	5	2%
A Government Organisation	11	4%
A community / voluntary group	9	3%
An industry trade or other association	9	3%
Other (please specify)	25	9%
Not answered	11	4%
Total	280	100%

4 Summary of all consultation responses

We received 280 responses to the consultation, including 47 stakeholder responses.

The responses are overall in favour of the proposals as presented. 60 per cent of the total respondents either agreed or strongly agreed with our proposed process for obtaining a vehicle star rating and 59 per cent of the total respondents stated they either strongly agreed or agreed with our proposals for the permit application process. 67 per cent of the total respondents stated either strongly agree or agree with our proposed safe system mitigating measures (including cameras and mirrors) and 58 per cent of respondents strongly agreed or agreed with our plans for how to enforce the scheme and deal with appeals.

4.1 Summary of responses to question 1

4.1.1 To what extent do you agree or disagree with our proposed process for obtaining a vehicle star rating?

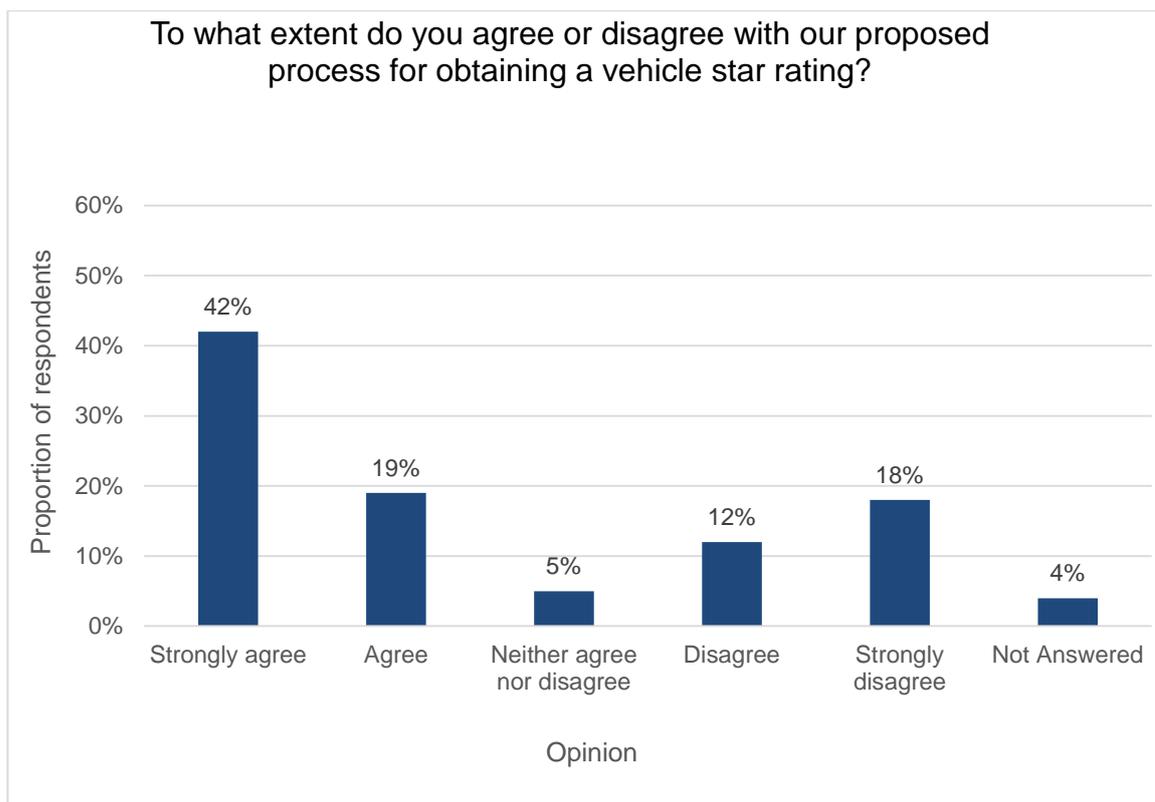
We asked respondents to tell us their view on the proposed process for obtaining a vehicle star rating.

The majority of respondents agreed with the process for obtaining a star rating (42 per cent of all respondents strongly agreed). Around a third disagreed with the proposals (18 per cent of all respondents strongly disagreed).

Table 1: To what extent do you agree or disagree with our proposed process for obtaining a vehicle star rating?

Opinion	Number of responses	%
Strongly agree	116	42%
Agree	54	19%
Neither agree or disagree	14	5%
Disagree	33	12%
Strongly disagree	51	18%
Not answered	12	4%
Total	280	100%

Figure 1: To what extent do you agree or disagree with our proposed process for obtaining a vehicle star rating?



4.1.2 Question 2: Agreement with proposal for the permit application process

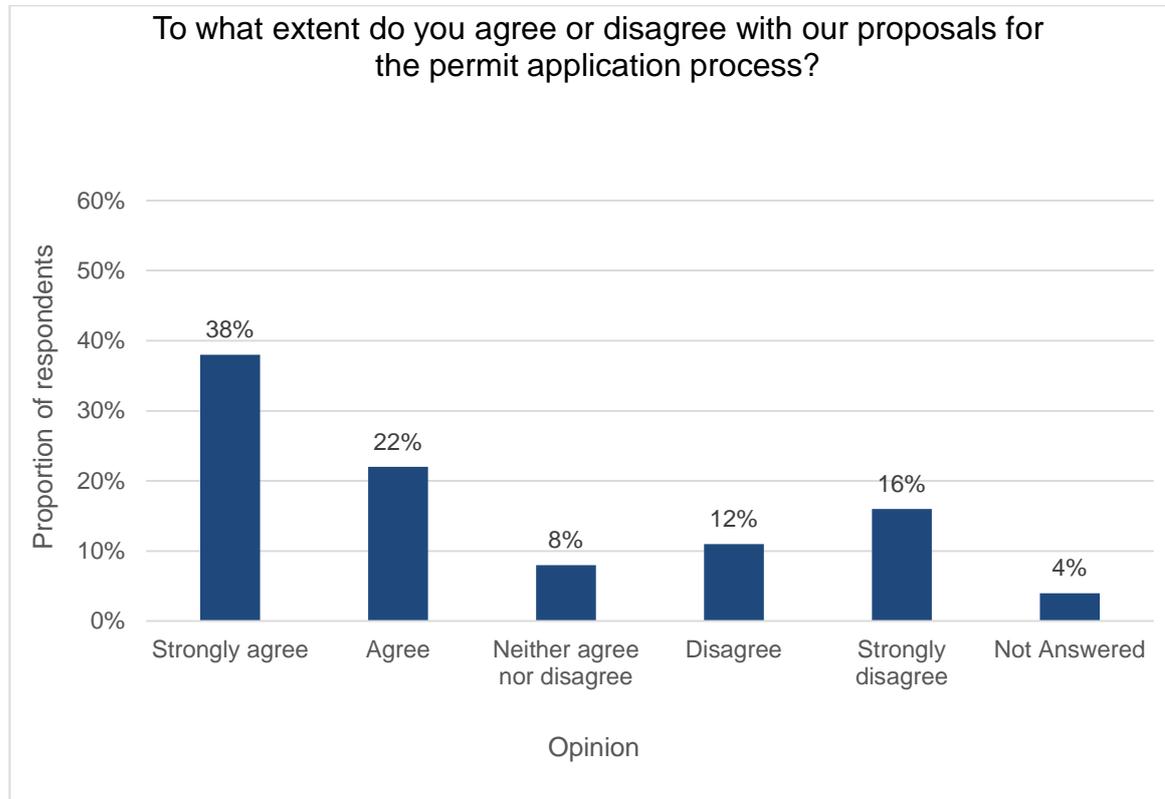
We asked respondents to tell us their level of agreement or disagreement on the proposals for the permit application process.

The majority of respondents agreed with the proposals for the permit application process (38 per cent of all respondents strongly agreed). A quarter disagreed with the proposals (16 per cent of all respondents strongly disagreed).

Table 2: To what extent do you agree or disagree with our proposals for the permit application process?

Opinion	Number of responses	%
Strongly agree	106	38%
Agree	61	22%
Neither agree or disagree	23	8%
Disagree	32	12%
Strongly disagree	46	16%
Not answered	12	4%
Total	280	100%

Figure 2: To what extent do you agree or disagree with our proposals for the permit application process?



4.1.3 Question 3: Agreement with proposed safe system mitigating measures

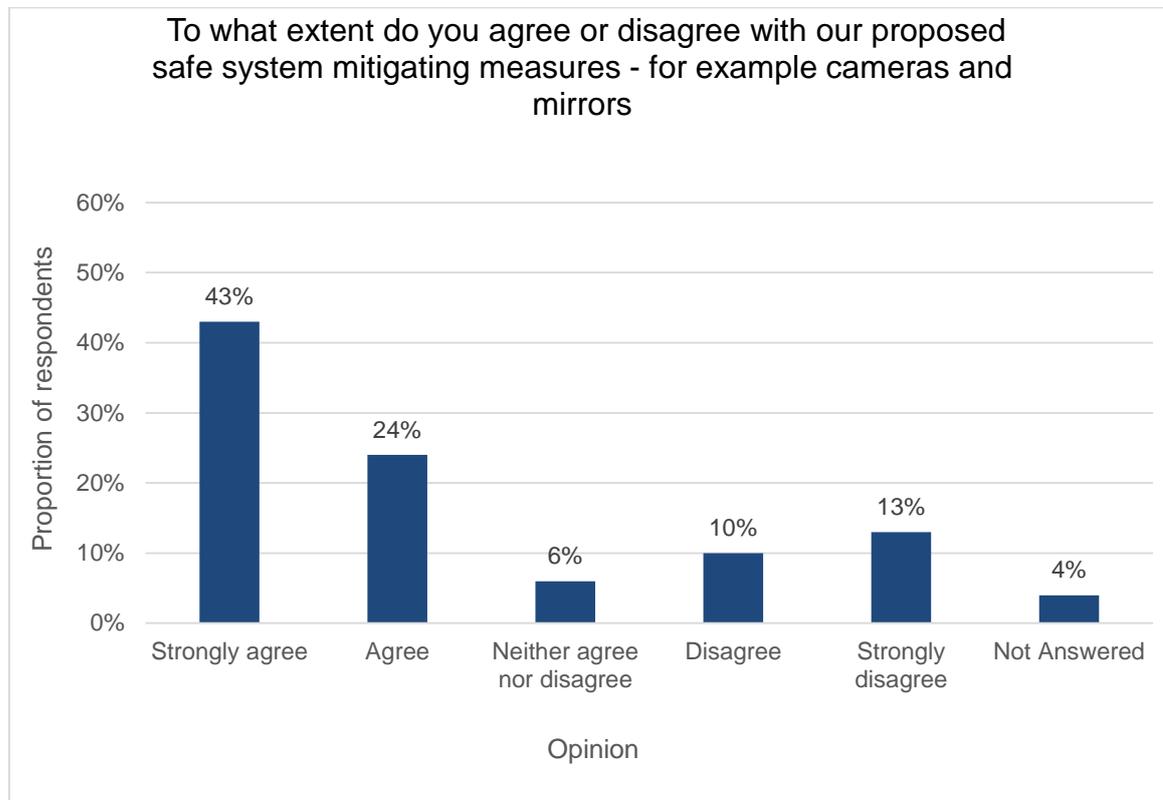
We asked respondents to tell us their level of agreement or disagreement on the proposed safe system mitigating measures.

Four in ten of all respondents strongly agreed with the proposed safe system mitigating measures (43 per cent). Just under a quarter disagreed, with 13 per cent of all respondents strongly disagreeing.

Table 3: To what extent do you agree or disagree with our proposals for the permit application process?

Opinion	Number of responses	%
Strongly agree	120	43%
Agree	67	24%
Neither agree or disagree	17	6%
Disagree	28	10%
Strongly disagree	36	13%
Not answered	12	4%
Total	280	100%

Figure 3: To what extent do you agree or disagree with our proposed safe system mitigating measures – for example cameras and mirrors.



4.1.4 Question 4: Agreement with proposals for how we enforce the scheme and how appeals will be dealt with?

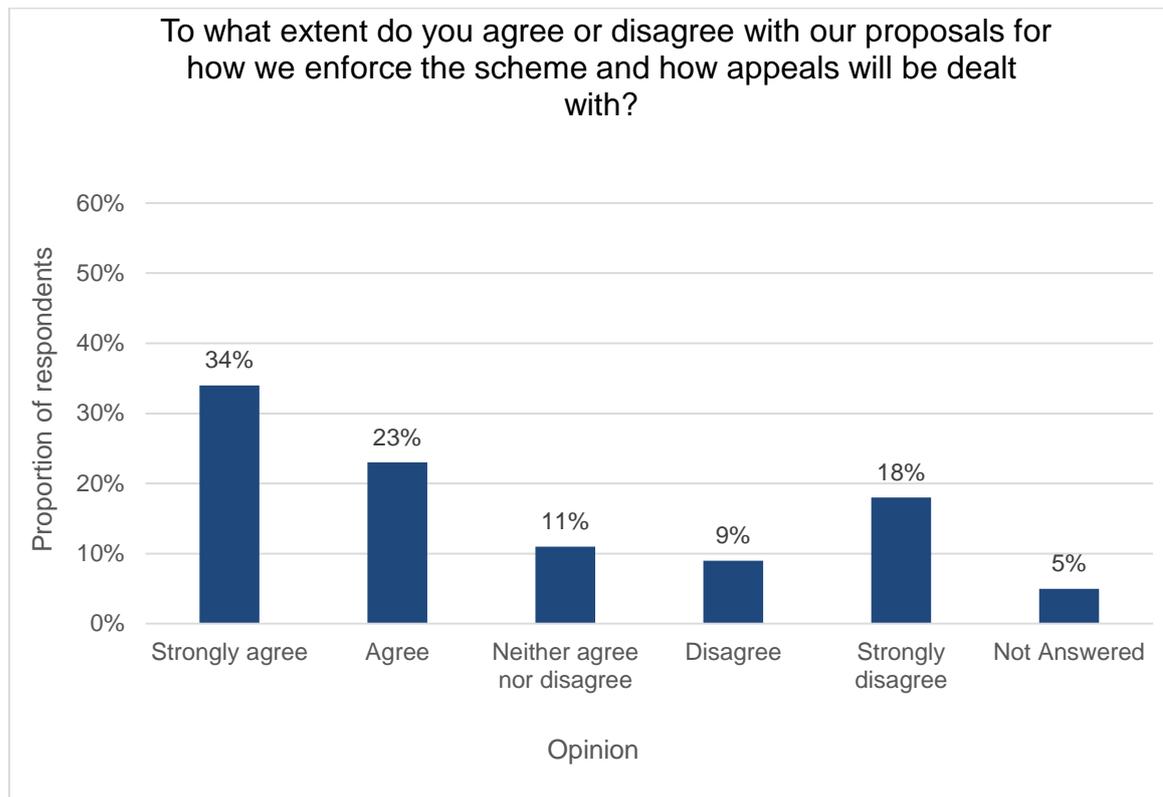
We asked respondents to tell us to what extent they agree or disagree with proposals for how we enforce the scheme and how appeals will be dealt with.

There was lower agreement with the proposals for how we plan to enforce the scheme and how appeals will be dealt with (34 per cent of all respondents strongly agreed), but a majority (57 per cent) still supported the enforcement proposals.

Table 4: To what extent do you agree or disagree with our proposals for how we enforce the scheme and how appeals will be dealt with?

Opinion	Number of responses	%
Strongly agree	95	34%
Agree	65	23%
Neither agree or disagree	30	11%
Disagree	26	9%
Strongly disagree	50	18%
Not answered	14	5%
Total	280	100%

Figure 4: To what extent do you agree or disagree with our proposals for how we enforce the scheme and how appeals will be dealt with?



4.1.5 Question 5: Further comments on final scheme proposals

The open question on further comments about the final proposals was answered by 174 respondents; 42 stakeholders and 132 members of the public. The percentages given below refer to the percentage of the 174 respondents which answered this question.

A code framework was devised which included key themes and within these themes, identified specific comments. This section presents the key themes and comments.

Coded responses are shown in the tables below.

Four in ten of the comments were generally positive or supportive of the DVS (41 per cent). This included general statements of support (18 per cent), statements that the scheme will improve pedestrian, cyclist and road safety, as well as reducing fatalities.

Some (seven per cent) stated that the proposals are too slow coming into effect and should be implemented sooner. However, five per cent disagreed with the transition period up to 2024, stating that lower rated vehicles should have more time to comply.

Four in ten of the comments were generally negative or criticised the DVS (42 per cent). This included concerns about the cost to install and enforce (seven per cent) and that it is a way to make money (six per cent). Six per cent stated that HGV drivers are already subject to enough regulations and qualifications.

Five per cent each stated that DVS standards should be set at an international level and that there is a lack of evidence to show the benefits of the proposed safe system.

The DVS having a detrimental impact on the haulage industry was raised as a concern, with 10 per cent stating it would be detrimental to the haulage industry and five per cent stating that further restrictions on HGVs will have a negative economic impact. The cost to the operator of safe system requirements was raised by 16 per cent. Ten per cent thought that the proposals are unfair and targeting the haulage industry with seven per cent stating that blame needs to stop being put on HGV drivers.

17 per cent had suggestions relating to HGV restrictions to improve safety, particularly banning HGVs from London except where necessary (five per cent).

Other suggestions to improve the proposals were to: introduce sensors or radar to HGVs (11 per cent), add warning signs (nine per cent), add more cameras to HGVs (seven per cent), introducing CCTV to HGVs (six per cent).

Eight per cent thought driver training should be made mandatory and six per cent requested that additional safety training is provided to HGV drivers.

In total 12 per cent of respondents mentioned something negative regarding the DVS rating scale, most commonly that the process is too reliant on vehicle manufacturers (six per cent).

Ten per cent stated they would need more information about how the system would work.

Improving behaviour and knowledge of cyclists was raised, with 16 per cent of all respondents suggesting that improvements could be made to cyclist behaviour and compliance, 11 per cent that there should be more enforcement of cyclists, six per cent that cyclists should be required to take a test and five per cent that cyclists need to be educated on issues such as road positioning.

Support proposed scheme

Comment	Count	Percentage
Good idea / support proposal	31	18%
Support this, will improve pedestrian safety	16	9%
Support this, will improve cyclist safety	22	13%
Support this, will improve road safety	27	16%
Support this, will reduce fatalities	19	11%
Should already have been implemented	3	2%
A cost-effective solution	1	1%

Support proposed scheme but with caveats

Comment	Count	Percentage
Good start, but proposals must go further / are too limited	1	1%
Proposals are too slow to come into effect, should be implemented sooner	13	7%
Good, but consider human factor in safety rating (e.g. different driver)	3	2%

Criticism/comments about proposed scheme

Comment	Count	Percentage
DVS will have no impact on safety / fatalities	3	2%
DVS will have little impact on safety / fatalities	1	1%
DVS is unnecessary, existing regulations and industry practices already cover these standards	1	1%
DVS proposal introduces yet more bureaucracy	7	4%
A way to raise more money	11	6%
Cost to install and enforce / money better spent elsewhere	12	7%
HGV / PSV drivers are already subject to enough regulations and qualifications	10	6%
Unrealistic timescales	2	1%
Scheme is expensive and won't improve safety	1	1%
Scheme will hurt small businesses	6	3%
DVS should be set at an international level	8	5%
Lack of evidence to show safe system benefits	8	5%
Don't believe it will happen	2	1%
Include lower door windows (LDW) in star ratings	5	3%
Poor idea / do not support proposal	7	4%

Neutral comments

Comment	Count	Percentage
Need more information on how the system would work	18	10%
Needs coordinating with other regulations i.e. ULEZ, LLCS (London Lorry Control Scheme), etc.	2	1%
Proposed DVS standards should be imposed equally on domestic and foreign vehicles	3	2%

Comments about wider impact of scheme

Comment	Count	Percentage
Detrimental to haulage industry	6	3%
Further restrictions on HGVs will pose a negative economic impact	9	5%
Unfair/targeting the haulage industry	18	10%
Will increase / raise delivery / customer rates (Wording "Customer" was added to this code)	8	5%

Positive comments about vehicle star ratings

Comment	Count	Percentage
Rating scale seems sensible	2	1%
Seem well researched / analysed	4	2%
One star rating is too low standard	3	2%

Negative comments about the vehicle star rating process

Comment	Count	Percentage
One star rating is too low standard	3	2%
Overly simplified system (how to rate borderline cases)	2	1%
DVS will encourage manufacturers to achieve the lowest rating / do minimum	1	1%
Contacting manufacturers to obtain a rating too onerous	5	3%
Process too reliant on vehicle manufacturers	10	6%
All ratings should be available online	3	2%

Suggestions about the vehicle star rating process

Comment	Count	Percentage
Earlier requirements to meet higher star ratings	1	1%
Scale is too broad, should be narrower	1	1%
Validation or audit of ratings assigned by manufacturer	2	1%
Earlier requirements to meet higher star ratings	1	1%

Positive comments about the permit application process

Comment	Count	Percentage
Will stop dangerous vehicles from coming into London	2	1%
Agree with the online evidencing requirement for zero star rated vehicles	3	2%
Online compliance checker tool useful	4	2%
Agree / support the creation of the permit scheme	5	3%

Negative comments about the permit application process

Comment	Count	Percentage
Disagree with transition period up to 2024 - lower rated vehicles should have less time to comply / comply sooner	2	1%
Disagree with transition period up to 2024 -lower rated vehicles should have more time to comply / comply later	9	5%
Time taken to apply for permit / waste of time	3	2%
Multiple vehicle permit application evidence proportions too reliant on trust	1	1%
Multiple vehicle permit application evidence proportions too low	3	2%
Photographic evidence of safe system required for zero star vehicles not robust enough	1	1%
Minimum requirement for a permit should be CCTV, sensors, and visual warning signs	8	5%

Suggestions about the permit application process

Comment	Count	Percentage
Timescales for compliance should be coordinated with other road transport measures i.e. ULEZ	2	1%
Ban for lower rated vehicles should be introduced sooner	1	1%
Ban HGV's that fail to meet the standards	1	1%
Permits should be transferable between operators	3	2%

Negative comments about the permit application process

Comment	Count	Percentage
Disagree with transition period up to 2024 - lower rated vehicles should have less time to comply / comply sooner	2	1%
Disagree with transition period up to 2024 -lower rated vehicles should have more time to comply / comply later	9	5%
Time taken to apply for permit / waste of time	3	2%
Multiple vehicle permit application evidence proportions too reliant on trust	1	1%
Multiple vehicle permit application evidence proportions too low	3	2%
Photographic evidence of safe system required for zero star vehicles not robust enough	1	1%
Minimum requirement for a permit should be CCTV, sensors, and visual warning signs	8	5%

Positive comments on the safe system proposals

Comment	Count	Percentage
Alignment with FORS/other schemes	8	5%

Negative comments on the safe system proposals

Comment	Count	Percentage
Not enough detail on technology specification	5	3%
Progressive 2024 safe system detail needed now	2	1%
Driver distraction / cognitive overload	6	3%
Cost to operator	27	16%
Driver training should be mandatory	14	8%
Safe System is just a copy of FORS	2	1%
Alarms / audible vehicle manoeuvring warnings installed are not fail-proof / do not always prevent accidents / they are too much of a noise nuisance	4	2%
Cameras installed are not fail-proof / do not always prevent accidents	5	3%
Mirrors installed are not fail-proof / do not always prevent accidents	5	3%
Added modifications / technology can be expensive to maintain / repair	2	1%

Suggestions on how to improve safety

Comment	Count	Percentage
Enforce low speed limits on HGVs / issues of HGVs speeding	1	1%
Ban HGVs from certain streets / areas	1	1%
Ban HGVs from London (except where necessary)	9	5%
Ban / restrict HGVs during certain hours	5	3%
Only allow smaller goods vehicles into Central London (i.e. Last Mile Delivery)	0	0%
Ban unroadworthy HGVs now	7	4%

Suggest measures to target HGV drivers

Comment	Count	Percentage
Improve standards of HGV driving including attitudes to other road users	3	2%
Provide additional safety training to HGV drivers / Update Certificate of Professional Competence	10	6%
HGV drivers need to be more careful when turning	2	1%
Give HGV drivers a lesson / training about cycling safety	1	1%
Measures to tackle distracted driving (i.e. no radio or mobile phone use)	1	1%
Other suggest measures targeted at HGV drivers	5	3%
Improve standards of HGV driving including attitudes to other road users	3	2%
Provide additional safety training to HGV drivers / Update Certificate of Professional Competence	10	6%
HGV drivers need to be more careful when turning	2	1%
Give HGV drivers a lesson / training about cycling safety	1	1%
Measures to tackle distracted driving (i.e. no radio or mobile phone use)	1	1%

Suggested modifications to HGVs

Comment	Count	Percentage
Add warning signs	16	9%
Add more cameras to HGVs	13	7%
Add more mirrors to HGVs (e.g. overhead 'cyclops' mirror)	3	2%
Add Fresnel lenses to HGVs	3	2%
Introduce sensors / radar to HGVs	20	11%
Provide larger windows on HGVs	3	2%
Skirt / barriers to prevent bicycles going under HGVs	2	1%
Add alarms / audible vehicle manoeuvring warnings to HGV's	6	3%
Funding / tax relief should be available for all vehicles fitted with safe systems	9	5%
Introduce CCTV to HGVs	10	6%
Need to prevent ways that HGV drivers can disconnect / tamper with modifications made to vehicles	2	1%

Positive comments about enforcement process

Comment	Count	Percentage
Agree with ANPR	3	2%

Negative comments about enforcement process

Comment	Count	Percentage
Should not be linked to LLCS	2	1%
Disagree with PCN -unfair	4	2%

Suggestions about enforcement process

Comment	Count	Percentage
Large fines / strict penalties for offending vehicles	7	4%
Need for sufficient resources to undertake enforcement	4	2%
Companies should be fined for non-compliant vehicles rather than the driver	4	2%
Driver offenders list / penalties for drivers	1	1%
More monitoring of HGV trips through Central London	5	3%
Defective safe system enforcement	1	1%

Suggested targeted measures for pedestrians and cyclists

Comment	Count	Percentage
More space is needed for cyclists (e.g. cycle lanes or shared use paths)	1	1%
Improve cyclist behaviour and compliance	27	16%
Reduce the speed of cyclists	1	1%
Ban cyclists from undertaking HGVs	1	1%
Ensure cyclists sit a test	10	6%
Make cyclists more visible (e.g. bike lights / hi-vis clothing)	2	1%
Educate cyclists e.g. on road positioning	9	5%
Get cyclists to travel in an HGV / experience as an HGV occupant	1	1%
More enforcement of cyclists (e.g. following highway code)	20	11%
Introduce cycle permits or licensing (road tax, registration plates)	6	3%
Cyclists should be required to have insurance	5	3%
Cyclists distracted by phones / headphones	3	2%
Other suggest measures targeted at cyclists to improve safety mentions	4	2%
Educate pedestrians i.e. crossing roads safely, using designated crossing points	3	2%
Improve pedestrian compliance i.e. obey pedestrian signals	7	4%
Pedestrians distracted by screens (e.g. phone, tablet, MP3)	1	1%
Pedestrians distracted by using headphones (e.g. music, phone)	1	1%

Other general suggestions

Comment	Count	Percentage
Vehicles and VRUs should be fully separated	1	1%
Install mirrors at blind bends / junctions	1	1%
Educate / further training of all road users / vulnerable road users (VRU) should be considered	5	3%
Improve all road users / vulnerable road users (VRU) behaviour / compliance significantly	3	2%
London roads need to be better / safer	5	3%

4.2 Responses from stakeholders

Local Authorities

London Borough of Brent

Brent Council supports the Safety Permit Scheme in principle. Brent Council fully supports TfL's ambition to lobby Central Government to consider a national scheme as HGVs that do not meet requirements are likely to be used in other parts of the UK.

Brent Council is concerned that no consideration has been given to inclusion of vehicles under 12 tonnes, arguing that it should apply to those with a HGV Driver's licence. The scheme risk operators shifting to smaller lorries, causing more lorries on the road and a detrimental impact on the objectives of the Mayor's Transport Strategy.

Brent Council questions the emphasis on visibility from the cab, when research shows technology would deliver better results. Brent Council supports the Direct Vision Standard with additional safe system mitigation measures. Brent Council strongly supports the scheme covering vehicles regardless of whether they are registered in the UK or outside it. It is not clear whether TfL intends to liaise with all manufacturers of HGVs to enable them to inform operators of the star rating of their vehicle(s).

Brent Council supports the introduction of the online portal to provide information/ advice. The application procedure seems straightforward, but Brent Council cannot fully agree for the following reasons: information should be displayed in different languages due to volume of foreign-registered HGVs; and no detail is provided on sharing of personal data if the UK leaves the EU under a no-deal scenario.

Brent Council would like to see more information on options considered to support small and medium-sized operators. Brent Council is also concerned about the lead in time to replace vehicles between 2020 and 2024. Operators might postpone investing in new vehicles, so Brent Council asks TfL to consider any potential detrimental impact in the medium to long-term.

Brent Council questions whether urban driving skills should be included as one of the mandatory mitigation measures. Clarification in relation to enforcement is welcomed. Brent asks TfL to reconsider the current proposal of only holding the permit electronically on their system.

London Borough of Camden

The London Borough of Camden strongly supports TfL's ambition to improve commercial vehicle safety through the introduction of DVS. However, it feels these proposals continue to fall short of fully addressing that danger, and the standard requires further development and is contradictory in places. Camden is concerned about misalignment with other similar initiatives eg London Safer Lorry Scheme (SLS) and the Construction Logistics and Community Safety (CLOCS) Standard, and the exclusion of one and two star HGVs from having to demonstrate compliance with the Safe System.

Camden has some concerns that whilst a secondary nearside window may contribute to a vehicle's star rating, they make no discernible benefit to VRU safety. Camden

questions that the DVS recommends the use of mirrors, given the lack of correlation between mirrors and safety. The research report data suggests that light levels are not a factor. It is concerned this may influence the development of equipment if manufacturers deprioritise low light level performance.

Camden notes the Integrated Impact Assessment report does not acknowledge that costs will be passed on to the consumer, or in the case of the construction industry, the developer.

Camden concludes the interpretation of this body of work is flawed, and notes contradictions and oversights between the consultation material and the supporting research material. Camden states that the DVS will only affect a small proportion of HGVs and that the DVS timelines don't align with the Vision Zero targets.

City of London Corporation

City of London strongly agrees with the proposals for: the process for obtaining a vehicle star rating, the permit application process, safe system mitigating measures and enforcement. While City of London completely supports the creation of a Direct Vision Standard and the accompanying star rating and permit scheme, it feels a more ambitious timeline is required in the context of the City of London. The City Corporation would be keen to pilot any London-wide schemes.

London Borough of Hackney

Hackney supports the safe systems proposal in principle. Hackney raises concerns from fleet managers over understanding the process of rating vehicles and timelines for achieving the ratings i.e. overall length this process might take.

Hackney supports requiring a high standard of mirrors. However, standards relating to mirrors should also include inspection, maintenance and driver training. Hackney is hesitant in recommending the full integral use of Visual Display Units (VDUs), as drivers take longer to acquire critical information. Hackney also has concerns that mirrors with VDUs could increase visual processing demand. Hackney believes sensor systems alerting drivers of the presence of VRU & pictorial stickers are a positive addition. Hackney notes low evidence for effectiveness of warning stickers but also notes the low cost and supports this with the caveat that effectiveness is not overstated and coupled with training. Hackney believes the suggestion for a larger front cabin windscreen would be a positive addition.

Hackney has concerns over future funding for driver training, also asking for consideration of changing the five-year period to every three years.

Hackney states that Safe System permits should be valid for the working life of the applicable HGV and should not be subject to future tightening of standards. To Hackney's knowledge there is currently only one brand of vehicle that meets DVS 3 star criteria but this manufacturer is not on any of the procurement frameworks.

London Borough of Islington

Islington strongly agrees with the proposals for: the process for obtaining a vehicle star rating, safe system mitigating measures and enforcement and agrees with the proposals for the permit application process. No further comment was provided.

Royal Borough of Kensington and Chelsea

The Royal Borough continues to support the concept of a 'Vision Zero' approach. The Royal Borough remains concerned that it would be possible for operators to avoid having any kind of direct vision based on fairly standard safety features and does not believe the proposals will see the decrease in VRU collisions involving lorries hoped for. The Royal Borough notes that 2020 Safe System requirements are already adopted by some operators, but a marked decrease in VRU collisions involving lorries has not been seen. It expressed concerns that many of the Safe System requirements, such as cameras and proximity sensors, are easily disabled by drivers and that final proposals do not include driver training as mandatory.

The Royal Borough states that enforcement plans are not clear from the proposals. The Royal Borough states that enforcement must include spot checks on compliance.

The Royal Borough supports TfL aligning the proposed DVS and safety permit scheme with the key dates of the Ultra Low Emission Zone (ULEZ). The Royal Borough would like more clarity for the 'Progressive Safe System' due for introduction in 2024 and suggests TfL should publicise which measures will make up this new system at least two years in advance.

London Borough of Lewisham

The London Borough of Lewisham sees the Direct Vision Standards as having a large part to play in ensuring safety. The London Borough of Lewisham strongly agrees with the proposals for: the process for obtaining a vehicle star rating, the permit application process, safe system mitigating measures and enforcement. To help to encourage more walking and cycling it must be perceived as safe. Measures to support drivers; helping to make it less stressful and easier for them to carry out their work is also welcomed. It expressed some concerns on the deadline of 2024 for Zero, 1, and 2 star rated vehicles, the least safe vehicles, to still be allowed to operate in London.

London Borough of Merton

The London Borough of Merton acknowledges the disproportionate safety risks to vulnerable road users posed by heavy goods vehicles and potential contribution a direct vision standard might play in meeting the Mayor's Vision Zero vision. Merton fully supports the proposals outlined. The council would like to see the star ratings displayed on the vehicle in a prominent position to help promote the scheme and hence inform public opinion.

The council particularly welcomes the recommendation that all drivers should undergo specific training on the safety of vulnerable road users and the use and limitations of supplementary vehicle safety equipment.

The council would like to emphasise the need to make sure that sufficient publicity resources are allocated for wider road safety messages and to ensure all businesses are fully aware of the new safety requirements and enforcement timescales.

London Borough of Southwark

Southwark supports measures to improve safety for all road users, particularly vulnerable users such as pedestrian and cyclists. Southwark support TfL's proposals to create a new HGV Safety Standard Permit Scheme. Southwark recognises the challenge in introducing a new system and would encourage TfL to expedite its delivery and continue

to raise vehicle standards over time. Southwark also raises the benefits of driver training and suggest that mandatory training of drivers on new vehicular technology should be included to continue to improve safety.

London Borough of Westminster

Westminster City Council agrees with the proposals for: the process for obtaining a vehicle star rating and safe system mitigating measures, and strongly agrees with the proposals for the permit application process and enforcement.

Westminster City Council broadly supports the proposed Direct Vision proposal for London. However, the scheme's implementation must be subject to advice received from the Freight and Logistics industry and truck manufacturers that Direct Vision specification replacement HGVs can be sourced within the consultation's stated 'horizon period' of 26 October 2020. It is also requested that a Direct Vision Communications plan includes parallel messaging to cyclists.

Other Government Organisations

London Councils

London Councils is very supportive of the proposed Direct Vision Standard (DVS) and its aims to help address the disproportionately high number of collisions involving HGVs and vulnerable road users in London. London Councils strongly agrees with the proposals for: the process for obtaining a vehicle star rating, the permit application process, safe system mitigating measures and enforcement.

Elected Representatives

Caroline Pidgeon – London Assembly Member, Liberal Democrat

Caroline Pidgeon strongly supports the overall objective of ensuring that the most dangerous lorries are kept off London's streets to protect both pedestrians and cyclists. She welcomes the Mayor's letter to the European Parliament urging earlier implementation of the forthcoming General Road Safety regulations. Caroline also welcomes the new TfL procurement terms which specify that all HGVs on contracts over £1m, will have to be one star or higher as of October 2019 and three-star as of October 2024.

Caroline Pidgeon strongly supports the process for obtaining a vehicle star rating. She believes the system could be enhanced by facilitating access to data on vehicle permits and ratings by developers, planning authorities and highway authorities, enabling these organisations to assess the transition to the safest lorries. Caroline is concerned that it is not clear if the application process will check the operator licences and what steps would be taken if this licence were to be revoked or not renewed. She argues that a process for the withdrawal of safety permits is vital.

Caroline Pidgeon strongly agrees with the need for mitigating measures in the period of transition to vehicles with five-star direct vision on London roads. However, feels the proposed measures could be improved, e.g. the quality standard of cameras and audible/visual alert systems for drivers to be defined more precisely so fleet operators

do not purchase ineffective systems. As a camera system must be fitted under the mitigating measures scheme, the addition of a requirement for a rear facing camera would help reduce the chance of a collision when reversing and Caroline believes the advice to provide driver training in Safer Urban Driving (SUD) should become a mandatory requirement.

Caroline Pidgeon supports the enforcement system, although would like to see verifiable electronic documentation issued to permit holders so that they can demonstrate to clients and local authorities that they comply with the DVS.

Caroline Russell – London Assembly Member, Green

Overall, Caroline Russell supports the measures being taken; stating that making progress towards Direct Vision will be a positive move that will reduce road danger for all road users in London. She has concerns about the way that evidencing safe systems reduces so sharply for larger fleets of vehicles.

Caroline Russell is interested in how the star rating scheme is perceived as improving safety in London and would like to see more details on the online system. She states that there should be transparent and regular reporting on the system – for example numbers of permits and PCNs issued and the overall composition of the HGV fleet in London by star rating. Caroline Russell finds it disappointing to see that driver training is not included in the final safe systems scheme.

Businesses

Astra Vehicle Technologies

Astra Vehicle Technologies strongly disagrees with the proposal for the process for obtaining a vehicle star rating and agrees with the proposals for the permit application process, safe system mitigating measures and enforcement.

Astra Vehicle Technologies strongly disagrees with the process for obtaining a vehicle star rating. The DVS Technical Protocol recognises the benefit of low-level passenger door windows, increasing the projection results. Yet as there are so few vehicle models available with low level windows fitted, Astra Vehicle Technologies believes retrofit low level windows should be considered to be taken into account in the star ratings, not just those installed by manufacturers.

It also has concerns about what happens to the hauliers that have upgraded their fleet to Euro 6 standard to comply with the new ULEZ standards as instructed by TfL without having the option of a retro-fit low-level passenger door windows.

Babcock Critical Services

Babcock Critical Services agrees with the proposals for the process for obtaining a vehicle star rating, neither agree nor disagree with the permit application process and enforcement and disagree with the proposals for safe system mitigating measures.

It is concerned whether as maintenance and procurement provider for London Fire Brigade (LFB), whether Babcock Critical Services needs to register the fleet of despite the exemption, whether there would be consideration to delay until more reliable units are available, and whether there will be an easier way to add new vehicles.

CEMEX

CEMEX agrees with proposals for the permit application process and with the proposed safe system mitigating measures. CEMEX agrees it will be important to enforce the scheme to ensure the safety of other road users and to deter those who do not comply.

CEMEX notes most construction vehicles currently on London's roads would be 0 or 1 star rated. CEMEX supports TfL's proposal to allow retrofitted large goods vehicles with extended angle mirrors, sensors, camera systems, audio warnings, stickers and underrun bars to achieve a safety permit.

CEMEX agrees with the proposed process for obtaining a vehicle star rating. CEMEX believes the measures proposed in the consultation for 2020 are reasonable and welcome the proposals allowing LGVs to gain a permit by retrofitting mitigating measures. CEMEX welcomes the proposal that LGVs below a 3-star rating in 2024 can continue to gain a permit as long as they install safe system mitigating measures, which can be retrofitted at proportionate cost. CEMEX supports an approach by TfL to assess the market before ruling (in good time) on what will be required from 2024.

CEMEX sees some blocks to procuring lower chassis vehicles as the only specialised construction vehicle that exceeds the 3-star threshold is the Mercedes Econic and the Denis Eagle. Mercedes Econics are not built at scale, cost more and may not be affordable. Other construction vehicle manufacturers are currently designing for a European market and it may not be possible for CEMEX's fleet to comply by 2024. A lower chassis also means a smaller engine, lower power output and more fuel, creating a negative environmental impact not in line with air quality targets. TfL must encourage the development of the market to develop the capacity that will be required by 2024. CEMEX does not support a lower chassis being a 3-star requirement. To achieve 3-stars, all higher N3G chassis vehicles would need a low-level passenger window with advanced indirect equipment fitted like blind spot cameras and side sensors. When considering what a safe system means to gain a safety permit in 2024, it is important to recognise that emerging progressive technologies cannot necessarily be retrofitted. If progressive systems are not fitted to new vehicles by manufacturers, they should not be required by TfL.

Day Group

Day Group agrees with the proposals for: the process for obtaining a vehicle star rating, the permit application process, safe system mitigating measures and enforcement. No further comment was provided.

DPD Group

DPD Group disagrees with the proposals for: the process for obtaining a vehicle star rating, the permit application process, safe system mitigating measures and enforcement. DPD Group feels this is another stealth tax for hauliers. While DPD Group agrees the roads need to be made safer in London, freight is required to keep the economy running and DPD Group operates in London because they have to be there in order to deliver to customers. While DPD Group agrees with cycling and walking and that TfL should protect the vulnerable; making roads smaller, and the city a no go zone for freight will increase operators costs, which has to be passed on somewhere. DPD Group suggests that TfL should look at alternatives to punishing freight operators.

Dawes Highway Safety

Dawes Highway Safety strongly agrees with the proposals for: the process for obtaining a vehicle star rating, the permit application process, disagree with the proposals for safe system mitigating measures and strongly agree with proposals for enforcement.

Dawes Highway Safety requests the inclusion of upgraded flat panel side guard covers in the DVS 'safe system'. Flat panel side guard covers are a recently developed 'mitigating measure' now being fitted at point of manufacture and retrofitted to large vehicles right across the UK. Flat panel side guard covers are a tried, tested and proven method of reducing harm, pain and anguish for all parties affected by a collision. This will have an unarguable benefit to vulnerable road users and save people's lives. Dawes Highway Safety implores the DVS team to reconsider by formally recognizing flat panels as part of the 'safe system'.

Hermes UK

Hermes is fully supportive of the aims of the DVS. Hermes states it is disappointed that the Direct Vision Standards do not take into account the steps being taken to improve road safety. The new Standard will impose huge costs on business and a burden onto operators to make changes or replace fleet at a time when TfL is also introducing stricter air quality measures. Hermes urges TfL to think about the implementation timetable and push this back to allow businesses more time to absorb costs for implementing these measures. Hermes is encouraged to see this standard only applies to N3 category vehicles exceeding 12 tonnes and would be very concerned to see it extended to lighter vehicles.

Further thought needs to be given to applying for permits for hire vehicles as well as the speed of applications given that some operators may only require short-term hire of vehicles for a particular busy period. Being able to change a vehicle permit between operators swiftly may be beneficial.

Entry level cabs such as those used for refuse collections are currently the only 5 star rated vehicles on the market. These vehicles are only suitable for urban environments and cannot be used for heavier freight or longer road haulage. Hermes also disagrees with operators having to confirm their intention and plan to implement a driver training policy as this is not mandatory.

Hermes is against this being set at a local level due to concerns this could undermine national regulation. Hermes believe that this should be something set at by national government, European or UN bodies.

Emphasis on the star rating of vehicles is being placed on the direct vision of the driver, not taking into consideration technological advances zero star rated vehicles might have. Although the proposed safe system requirements are stipulated for operators, anything that achieves improving driver visibility should be attributed to the star rating. The desired outcomes of the DVS measures are not clear. The consultations make no mention of any targets or standards that need to be achieved in order for the scheme to be considered a success.

Hermes disagrees with the proposed process for obtaining a vehicle star rating, stating there should be one central location for operators to check star ratings, with the current proposed system a burden on manufacturers. Hermes was encouraged to hear that TfL

is preparing to build a VRM checker into the website so that operators can input a registration number to indicate a star rating.

Hermes disagrees with some elements of the permit application process. It supports being able to apply for multiple vehicle permits and the corresponding proportion of evidence table. Hermes believes TfL should inform the sector of timescales on processing the permits.

Hermes agrees with the proposals for enforcement and appeals including using ANPR and Penalty Charge Notices. Hermes is concerned at the lack of clarity about whether drivers and operators could both be liable for fines for the same breach. Hermes would want to ensure a driver of a vehicle that does not have a permit is not held personally liable. Where a driver has been found to have switched off equipment or not carried out proper, ensuring that all equipment is working, then a PNC should be levelled at the driver.

John Lewis Partnership

The Partnership states the implementation of the DVS standard should be as seamless as possible, and any adjustment should be discussed with relevant trade bodies and representatives from vehicle operators, to ensure full co-operation. The Partnership agrees with the outline proposal for obtaining a vehicle star rating.

The Partnership agrees that driver training is not mandatory, however it is considered that more clarification is needed around training required for drivers.

The Partnership fully agrees with the need to improve all round driver visibility, but caution needs to be exercised in relation to the fitting of too much safety equipment in relation to what the driver can reasonably expect to react to. One concern is the fitting of both an audible warning to the driver of an external danger, and the externally fitted warning to other users.

The Partnership agrees that enforcement should deter non-compliant operators. However, enforcement should not mirror the process already in place with the London Lorry Control Scheme. Consideration should be given to a lower level of fine, along with a system of warning, awareness and training workshops, before penalties are given. Any form of appeal process should be made easy, with an independent adjudication panel giving consideration to each individual case.

Royal Mail

Royal Mail strongly agrees with the proposals for: the process for obtaining a vehicle star rating, the permit application process, safe system mitigating measures and enforcement.

The vagueness of the regulations as they stand is a source of concern, since Royal Mail is unclear what specification of equipment is needed to comply. Royal Mail also has concerns about the capacity of the market to deliver retrofit solutions in the remaining time for compliance. Royal Mail would encourage further engagement with a wider range of manufacturers to help ensure that the options are available to improve the star ratings.

To meet DVS, Royal Mail will need to invest in effective measures in order to retrofit any of the fleet that does not meet the necessary safety star rating and will also need to further train drivers. However, it does not currently have the level of certainty needed to do this with confidence. In Central London Royal Mail has had to invest in new fleet to meet the requirements of the ULEZ coming into force in April 2019. The lack of certainty around DVS classifications for vehicles bought to meet ULEZ is unhelpful for businesses and Royal Mail expects TfL to recognise this in future decision making.

Royal Mail asks that a consideration is made when designing the process to award safety certificates to modified vehicles. When a vehicle is modified to a new improved star rating the new safety certificate must recognise all modifications i.e. there may be the case where it can become a higher star rating over the manufacturer's standard.

Tideway

Tideway recognises the risk HGVs present to vulnerable road users, with a principal contributory factor being limitations to a driver's vision. Tideway is generally supportive of the proposal to introduce more stringent HGV safety standards. Tideway believes addressing vehicle blind spots is more effective through direct vision, as opposed to indirect visual aids. Tideway had hoped to stimulate the market and help normalise this vehicle type in London. However, the proposed permit scheme requirements do not support this. There is a significant cost premium to higher DVS rated vehicles, which is unlikely to be addressed until there is widespread adoption. The Mayor, GLA, TfL and London Boroughs could use their powers to encourage this, including contractual requirements.

Tideway believes this consultation misses the fact that to achieve safer HGVs, physical ground conditions at worksites and at disposal sites must be suitable for all HGVs. Many of the HGVs that pose the greatest risk are designed to be driven off-road, when the majority of off-road HGVs on London's streets only spend a tiny proportion of their time operating in off-road conditions.

Vehicles over 12 tonne GVW being in-scope of HGV DVS rating addresses Tideway's concerns raised in the HGV DVS Consultation 2a response. Tideway agrees with the proposed process of obtaining a star rating through the relevant vehicle manufacturer. Any non-rated vehicle should be considered 'zero star' and subject to the HGV Safety Permit Scheme requirements. There should be a process whereby these ratings can be independently verified to make sure manufacturers are accountable. Identifying the star rating of a vehicle must be a simple process with a central, publicly accessible database.

The process for obtaining a vehicle permit for one to five star rated vehicles, zero-rated vehicles and multiple fleets through an online portal is supported. However, the sample size evidencing process for multiple fleets could be strengthened as there are operators in the haulage industry with low operating standards.

The proposed permit duration to 2024 for zero to two-star rated vehicles is acceptable. However, issuing a ten-year permit for three to five-star vehicles does not reflect the progressions in the 'safe system'. Whilst driver training is advisory, there will be no consequence to operators who choose not to adequately train drivers. Tideway states a permit should be withdrawn on transfer of vehicle owner and a new permit applied for.

Utilising the existing network of ANPR cameras across London is both effective and cost efficient. The two-level penalty approach is a preferred consequence than a standard Fixed Penalty Notice of £50. However, more robust action should be taken against persistent permit scheme offenders such as permit revocation. Tideway has no comment on the appeals process.

UPS

UPS supports the Mayor's aim to eradicate all deaths and serious injuries caused by road collisions by 2041. Whilst UPS feels the HGV Safety Permit Scheme is a welcome move away from the narrow focus of the Direct Vision Standard, it still has several concerns.

UPS feels safety standards should not be set at a city or country level but at an EU or international level. Currently, manufacturers are not producing vehicles to the specifications outlined so operators may incur costs to retrofit vehicles and may not be able to meet current timelines. If London implements bespoke safety measures, this will create a niche market for manufacturers and drive up prices.

UPS welcomes a widening of the measures proposed which will enable carriers to demonstrate a safe system beyond purely a Direct Vision standard. UPS believes this will be the most effective way of addressing safety issues and that technical developments over time will mitigate the requirement for improved direct vision. However, greater clarity is needed on the type and specifications required for the safe system so that operators have certainty on the type of equipment to install.

Whilst UPS understands that with advancements in technology and other safety methods, the safe system scheme needs to continue to advance and be updated, they argue that when measures are tightened from 2024, these should only be for new vehicles not existing vehicles. Vehicles purchased today will still be in service beyond 2024 and whilst equipment can be retrofitted, it is better for these to be stipulated from the beginning. If additional measures are required from 2024 on all vehicles, UPS suggests at least two year's notice should be given to allow for planning and implementation.

Manufacturers

DAF Trucks

DAF Trucks is supportive of the aims and objectives of the proposed DVS and the Safety Permit Scheme. However, DAF Trucks states the sole focus on HGVs fails to acknowledge incidents involving other vehicle types. DAF Trucks welcomes the development of the Safe System Permit and the non-prescriptive Safe System minimum standards. DAF Trucks would like to encourage TfL to harmonise with planned UNECE regulatory requirements, and to bear in mind that new safety regulations will affect new types and new registrations, but not existing vehicles.

DAF Trucks remains concerned that the DVS star rating scheme fails to recognise the limitations of direct vision when Vulnerable Road Users (VRUs) are alongside the vehicle or when the driver is not looking directly at them. Camera and sensor systems can help a driver to be aware of VRUs even when not in direct vision.

The DVS star rating system cannot be readily met by manufacturers in the design of new vehicles and cabs, or by operators. The few available low entry cab variants are designed specifically for refuse collection and can be ill-suited for alternative applications. DAF Trucks state the lack of clarity about 2024 requirements is unhelpful. Any significant changes to the Safe System requirements need to be decided and communicated well in advance of implementation.

DAF Trucks has concerns regarding the Safe System recommendation for a forward-facing camera with a screen, and states drivers should be discouraged from using a screen to view the road ahead, except to view any direct vision blind spot whilst stationary.

TfL should be alert to unintended consequences as the scheme will encourage more light goods vehicles of 12 tonnes GVW or less, which will increase traffic volume, increase congestion and could increase accident levels.

Volvo

The Volvo Group neither agrees nor disagrees with the proposals for the process for obtaining a vehicle star rating, the permit application process and enforcement. The Volvo Group agrees with the proposal for safe system mitigating measures. The Volvo Group main concerns are a number of unclear issues regarding the DVS protocol: a clear definition of Average Proxy Height; a clear definition of tyres; the definition of a 3 star vehicle in 2024. The Volvo Group suggests removing the steering wheel from the DVS model. The Volvo Group states pedestrians and cyclists should be included in training programs to reduce their own vulnerability as a road user.

The Volvo Group states manufacturers need clarity on: the lead time prior to launch, costs for registering; what is considered a cab upgrade; compliance that cab volumes and implementation of the AHP height is being measured and administered in line with the protocol; timescale for compliance checks and costs involved.

The Volvo Group states there is no clear mechanism and format for providing information. Given the number of non-UK registered vehicles the consultation does not highlight how non-UK registered trucks are going to be handled.

The Volvo Group supports the safe scheme including cameras and sensors, coupled with direct division offering a more holistic approach to cyclist and pedestrian safety. However, it has some queries: whether the performance demands are clearly outlined for items required in the safe scheme; whether there will be exemptions if a vehicle is only taken into the London area for repair.

It expressed concerns over the scheme in 2024. Specifying the type of truck now to meet the "Safe Scheme" demands of 2024 is a priority. In 2024, a truck purchased this year will be five years old, and under current proposals will need some form of upgrade to a progressive scheme.

The Volvo Group states direct view, indirect view, cameras and detection systems must be considered holistically to gain the best safety benefits. For the safe scheme Volvo Group is concerned there is no agreed standard for the equipment chosen. It has concerns about monitors for low speed manoeuvring and side sensor systems.

The Volvo Group does not find the appeal procedures clear. For example, driver training is not part of the safe scheme but are referred to in the consultation with a demand for evidence on driver training. Whether the vehicle fulfils the demands of the safe scheme or DVS should not be the responsibility of the driver, but the responsibility of the transport company.

Trade bodies

British Association of Removers

The British Association of Removers disagrees with the proposal for the process for obtaining a vehicle star rating, neither agrees nor disagrees with the permit application process, disagrees with the safe system mitigating measures and strongly disagrees with the proposal for enforcement an appeals. It is concerned the circumstances surrounding sector specific traffic (i.e. the removals industry) have not been properly considered. The removals industry traditionally uses its rolling stock over a 15 to 20 year life cycle and costs associated with compliance will be an added burden to the operator and consumer. It also notes the industry is already under margin pressure from the non-regulated 3.5t man and van operators and the costs associated with compliance to DVS and ULEZ are likely make that situation worse.

British Vehicle Rental and Leasing Association

The British Vehicle Rental and Leasing Association (BVRLA) remains concerned the proposed DVS will not be the most effective measure to reduce accidents from vehicles passing through London. The BVRLA believes national and international standards for vehicle safety should be set by central government and is concerned about TfL setting its own standards due to uncertainty created for operators by a breakdown in cohesive national and international regulation. The BVRLA believes establishing a national framework on road safety, as well as the re-establishment of road safety targets is needed.

It suggests DVS should recognise safety improvements to fleets implemented by operators, including camera technology, noise warning and alert systems, laser technology to improve safety. It also suggests national government and TfL can provide incentives to upgrade vehicles to the highest standard. The BVRLA believes it is critical the responsibility for liability is transferable to the operator, not the owner.

The BVRLA would also support road and junction design changes to reduce the likelihood of road accidents involving motor vehicles.

Freight Transport Association

The Freight Transport Association (FTA) supports the Mayor's 'Vision-Zero' approach. However, FTA is opposed to vehicle design being set at a local level believing this is the role of the national government and ideally set by UN or European level bodies. The creation of a Direct Vision Standard will create a niche market for the manufacturers which will increase prices of trucks in London. The FTA calls on the Mayor to move away from a narrow focus on direct vision and a safe system which is backed up by inconclusive research and to focus on vehicle compliance with existing regulation and in

the medium to long term on supporting industry and manufacturers in the development and adoption of technological solutions.

If current proposals are pursued, FTA suggests TfL strongly considers only requiring new vehicles to comply with the HGV Safety Permit System with a sensibly deferred timeline for existing vehicles.

Whilst cameras and mirrors provide an alternative to direct vision, audible alarms do not. The FTA suggests these items are removed from safe system requirement. Further guidance is needed on the safe system requirements to enable operators to have confidence that they are fitting the right equipment in the right way. A deadline needs to be set for progressive safe system to be confirmed i.e. at least two years before 2024, to allow lead time for equipment to be fitted. Any requirements for the progressive safe system must be additional, so equipment fitted for the 2020 safe system is not rendered obsolete before it is life expired.

Enforcement and appeals process must be operated in a sensible and pragmatic way and those enforcing the scheme must have the appropriate level of skills, knowledge and training to make appropriate judgements.

Institution of Civil Engineers London

The Institution of Civil Engineers (ICE) London sees a need for new safety measures and strongly agrees there should be a safety permit scheme. ICE London believes the highest standard of DVS vehicle should become the norm and believes it should be ensured that any interim mitigating measures for vehicles that do not currently meet the required star grading are of sufficient quality to reliably provide the data that drivers need to reduce road danger.

ICE London strongly supports the proposed process for obtaining a vehicle star rating and agrees all HGVs should meet the minimum direct vision star rating threshold before they can operate. Where a vehicle is rated or assumed to be zero-star ICE London believes there is room to improve the safe system that will apply to such vehicles.

ICE London agrees with the proposed permit application process but believes that regular checks to identify the status of operator licences should be considered. Where a licence is no longer valid, a process should be implemented for the withdrawal of safety permits.

ICE London agrees there is a need for safe system mitigating measures. However, suggests improvements: e.g. ensuring that safe system measures meet a certain standard of quality.

ICE London also suggests additional requirements - such as for vehicles to include a rear-facing camera. Training on safety of vulnerable road users and use and limitations of supplementary vehicle safety equipment could also be made mandatory.

ICE London does not have a firm view on the enforcement mechanisms.

Road Haulage Association

The Road Haulage Association (RHA) strongly disagrees with the proposals for: the process for obtaining a vehicle star rating, the permit application process, safe system

mitigating measures and enforcement. The RHA believes the Direct Vision Standard / London Lorry Permit scheme proposal will be largely ineffective, expensive and inappropriately targets lorry drivers with heavy fines. The RHA has been disappointed the views of operators have been dismissed and believes this is as a result of TfL's commitment to its original plan regardless of the consultation. It is a great concern to the RHA that TfL has focussed almost exclusively on one aspect of the road safety problem – the physical nature of lorries and have failed to examine and assess the cause of collisions on London roads.

The RHA is in favour of improved vehicle standards, including in the area of vehicle design. The RHA believes vehicle standards should not be set locally, rather nationally or internationally. The local setting of standards causes confusion, cost and inconsistency.

The RHA also has concerns the proposals create significant additional administrative burdens for operators. There are lorries that have been modified by specialist coachbuilders and altered from manufacturers specification and there needs to be a process for determining compliance in this circumstance. Proposals for small fleets with less than 5 vehicles to upload data on all vehicles, which do not apply to those with larger fleets, is also seen as discrimination against SMEs.

The RHA views on driver training is that this requirement should be removed from the scheme, as it is not mandatory. The RHA finds the proposal to fine drivers £130 unacceptable.

The "safe system" requires cameras for zero star vehicles to cover areas not visible to drivers of 1 star to 5 star vehicles. This approach is inconsistent. The "safe system" requirement for audible warnings will create noise nuisance and there is insufficient evidence for use.

The RHA states permits for all vehicles rated 1 to 5 star should be transferable.

Society of Motor Manufacturers and Traders (SMMT)

The SMMT supports the Safety Permit Scheme, as a mechanism to allow businesses using HGVs that do not meet TfL's DVS requirements to continue operating in London. The SMMT believes the DVS protocol must fully align with existing and proposed legislation established under the UNECE and EU regulatory frameworks to avoid market fragmentation and higher costs to operators.

The SMMT does not believe there is sufficient evidence to support the introduction of a DVS 'star-rating' founded on a CAD-based approach using a fixed eye-point location and arbitrary grade boundaries.

The SMMT believes it is important to align the timings of the DVS and HGV Safety Permit Scheme with plans for London's ULEZ schemes, so vehicle operators have clarity on requirements when purchasing new vehicles for fleets.

The SMMT states equal focus should be placed on the skills and behaviour of all road users (through education and enforcement) and the maintenance and design of road infrastructure.

A requirement for a low-entry cab for all trucks would have a significant affordability impact as such alterations to the vehicle, while increasing the glass area, greatly reduce the payload capacity, thereby more vehicles are needed to transport the same amount of freight. This could lead to more trucks on the road, contrary to TfL's air quality ambitions.

However wide the field of view in a low-entry cab, a truck driver can only look in one direction and still might fail to notice a pedestrian or cyclist on the other side of the vehicle. To mitigate this and reduce cognitive overload truck manufacturers believe introducing active safety systems in combination with direct and indirect vision systems would be the most effective method to improve safety for all users.

The Chartered Institute of Logistics and Transport (CILT)

The CILT notes the logistics industry requires certainty and the ability to plan long term. Vehicle replacement cycles are between 5 -10 years and the slow development of this scheme, and ULEZ requirements for the industry, has meant many operators have delayed purchasing decisions. It would therefore be useful to confirm no changes will be made to the scheme between now and 2024, and the planned review in 2024 will allow sufficient time for operators to adapt fleets accordingly.

The CILT agrees with the principles of the scheme star rating and application process, but the overall process to obtain a star rating and applying for a permit is an additional administration process for operators, which will add cost and complexity. It is also reliant on the manufacturers providing accurate information on vehicles which may have had operational modifications. It is concerned that the use of the HGV survey which only took place between 07:00 and 19:00 may have skewed the results; affecting the assumed splits between 1- and 5-star vehicles.

The CILT agrees with the principles of the scheme's mitigating safety measures but has concerns about how reviewing the mitigating measures for the DVS, will 'evolve over time'. The proposed review for the scheme in 2024 must allow sufficient time for operators to adapt accordingly.

The proposal to link the Safety Permit Scheme to the London Lorry Control Scheme (LLCS) may offer some benefits in reducing separate administration but does not deal with compliance to the LEZ and ULEZ, or congestion charge. If there is a desire to simplify the administration process for operators, all the regulations impacting on the industry should be reviewed and potentially combined. The biggest concern is the LLCS is out of date, encouraging HGVs to make longer journeys and discourages overnight deliveries. The CILT strongly urges the Mayor and TfL to address the issues with the LLCS before adding-in the complexity of the Safety Permit.

Transport related interest groups and charities

Action on Lorry Danger

Action on Lorry Danger strongly agrees with the proposals for: the process for obtaining a vehicle star rating, the permit application process, safe system mitigating measures and enforcement and looks forward to Direct Vision lorries becoming ubiquitous.

Brake

Brake welcomes the final scheme proposals as innovative way to protect the safety of Vulnerable Road Users from the dangers posed by HGVs on London's roads. Brake agrees with the proposals for: the process for obtaining a vehicle star rating, the permit application process, safe system mitigating measures and enforcement. No further comment was provided.

Cycling UK

Cycling UK continue to support the principle of a Safety Scheme Permit (SSP) as part of the DVS but has concerns that unless the criteria are clearly defined, there will be little incentive for operators to commence transitioning fleets. If the bar for obtaining a permit for a zero-star HGV is set so low that the majority of operators can acquire one for most of their HGVs, with minimal alteration to vehicles, there is a risk that the DVS will be watered down.

Cycling UK strongly supports the process for obtaining a vehicle star rating, however, states it should be made clear that this is a progressive safe system. Cycling UK has no major disagreement with the proposals for applying for a permit, however is concerned the consultation document is unclear on the process for: revoking or declining to renew a permit; checking ongoing permit compliance; cross-referencing permit applications against Operator Licences. A process for revoking permits is necessary to deal with situations where the safe system is later removed.

Cycling UK broadly agrees with the proposed safe system mitigating measures but believes those measures could be improved and strengthened. The quality standard for cameras and audible/visual alert systems should be defined more precisely. Installing cameras and alert systems must contribute to reducing road danger and not be a box-ticking exercise.

Cycling UK believes the provision of driver training via a Safer Urban Driving (SUD) module should be a mandatory requirement of the SSP.

Cycling UK is concerned about the limitations of the enforcement proposals, which focus on the camera system and fines for drivers and Operators. Camera enforcement is likely to be effective in discouraging those without an SSP but will not detect whether safe systems are still in place. Rogue operators must know that attempts to cheat the permit system will have serious consequences, including withdrawal of permits as part of the enforcement system.

Ferry Lane Action Group

Ferry Lane Action Group strongly agrees with the proposals for: the process for obtaining a vehicle star rating, the permit application process, safe system mitigating measures and enforcement. No further comment was provided.

London Cycling Campaign

LCC considers the recently developed DVS, and the replacement of more hazardous vehicles with safer ones, to be a vital element of reducing road danger in London. LCC also welcomes the Mayor's urging European Parliament for earlier implementation of the General Road Safety regulations.

LCC strongly supports the process for obtaining a vehicle star rating. The system could be enhanced by facilitating access to data on vehicle permits and ratings issued in London, enabling organisations to assess the transition to the safest lorries and help them meet targets for road danger reduction.

LCC state it is not clear if the application process will check operator licences and what steps would be taken if this licence were to be revoked/ not renewed. Some operators may decide to upgrade to star graded vehicles during the period to 2024 and if this occurs, it would be useful to note the data to assess progress towards making safer lorries the norm. LCC supports the enforcement system but would like to see verifiable electronic documentation issued to permit holders. A process for the withdrawal of permits and regrading of permits needs to be developed.

LCC agrees with the need for mitigating measures in the period of transition. The quality standard of measures, notably cameras and audible/visual alert systems for drivers, must be defined more precisely so fleet operators do not purchase ineffective systems. A requirement for a rear facing camera would help reduce collisions when reversing and enable drivers to see approaching vehicles.

The advice to provide driver training in Safer Urban Driving (SUD) needs to become a mandatory requirement. A single declaration of providing SUD to all drivers by the operator could be accepted for the purpose of issuing a permit.

The TfL permit scheme must define a clear path for wide-spread adoption of lorries with good direct vision in London. The 2024 deadline should be sufficient to enable enough landfill sites to cater for LEC (low entry cabs) or N3 lorries and for London operators to switch to such sites.

Better Streets for Enfield – Enfield Cycling Campaign

Better Streets for Enfield – Enfield Cycling Campaign endorses the London Cycling Campaign's response.

London TravelWatch

London TravelWatch neither agrees nor disagrees with the proposals for: the process for obtaining a vehicle star rating, the permit application process, safe system mitigating measures and enforcement.

As part of the work that London TravelWatch undertook in the run up to the last mayoral election, members determined to particularly support the improvement in the design of HGVs to make them more suitable for London's roads. It is hoped direct vision for drivers of these vehicles would achieve this and make London's streets safer for vulnerable users.

Road Danger Reduction Forum

The Road Danger Reduction Forum strongly agrees with the proposals for: the process for obtaining a vehicle star rating, the permit application process, safe system mitigating measures and enforcement. The Road Danger Reduction Forum states this should be backed up by a higher amount of traffic law enforcement with regard to HGVs than exists at present.

Road Safety Markings Association (RSMA)

The RSMA notes that while the TfL's Direct Vision Standard and Safety Permit for HGVs scheme is a supportable endeavour, the introduction of the additional vision aids on specialist road marking vehicles would create a significant, and unnecessary, burden on road marking contractors. The Road Safety Markings Association requests that vehicles used for the installation of road markings and studs are provided exemption from the Direct Vision Standard and Safety Permit for HGVs.

The RSMA believes the specialist nature of road marking vehicles renders compliance with the DVS both cumbersome and unnecessary. The specialist nature of the vehicles, combined with the relatively short amount of time driving, the seasonal nature of the industry, and the times of day commonly operating would mean road marking vehicles become compliant with the DVS for the sake of becoming compliant, without engendering any tangible benefit in terms of reducing harm to pedestrians or other road users.

In addition, it is not always possible to install the safety equipment stated by TfL. By the very nature of road marking vehicles' operating procedures, installation of side under-run protection barriers would render the vehicle incapable of performing its operational role.

Although the DVS describes it as non-mandatory, the RSMA is concerned about the provision with regards to driver training. Operators of road marking vehicles are by law entitled to drive the vehicle on a Category B licence and are exempt from having to obtain anything higher, as they are categorised as road construction vehicle. The RSMA is concerned that the statutory licence requirements will have an adverse effect on road marking contractors seeking to apply for the safety permit.

The Royal Society for the Prevention of Accidents (RoSPA)

RoSPA is supportive of the HGV permit safety scheme, including the Direct Vision Standard, vehicle star ratings and safe system for vehicles not meeting the minimum star rating threshold.

The proposed compliance checker tool should make the process quick and simple for operators. RoSPA agrees with the proposed permit approval process for HGVs rated one to five stars and zero star or unrated HGVs.

RoSPA agrees with mitigating measures including mirrors, cameras, sensor systems, audible vehicle manoeuvring warnings, warning stickers and side under-run protection where vehicles do not meet the minimum star rating threshold. RoSPA also agrees that the star rating of a vehicle should never be increased due to the fitting of supplementary safety equipment.

RoSPA would like to see driver training as a mandatory requirement but recognise enforcement issues. Instead, RoSPA supports TfL's proposals to ask operators to demonstrate their system to train all drivers in vulnerable road user safety and the use and limitations of supplementary safety equipment. RoSPA agrees this should be required for all permit applications, including those for vehicles that meet the minimum Direct Vision Standard star rating.

RoSPA agrees to enforcement by automatic number plate recognition and that HGVs in breach should be issued a penalty charge notice of £550 for operators. However, RoSPA is unsure in which circumstances a driver will be issued a penalty charge. As proposed, TfL should have the ability to revoke or suspend a HGV permit if the vehicle is found to be in breach of permit terms.

Stop Killing Cyclists

Stop Killing Cyclists supports making blind-spot CCTV, sensors and visual displays compulsory for all HGV, construction and other trucks entering London from October 2019. Stop Killing Cyclists also supports the mayor's proposals for all new trucks to be full vision from 2024.

Southwark Cyclists

Southwark Cyclists strongly agrees with the proposals for: the process for obtaining a vehicle star rating, the permit application process, safe system mitigating measures and enforcement. No further comment was provided.

Transport and Environment

Transport and Environment strongly agrees with the proposals for the process for obtaining a vehicle star rating and the permit application process and agree with the proposals for safe system mitigating measures and enforcement. Transport and Environment acknowledges that direct vision has been shown to improve the safety performance of truck drivers and drivers are proven to react faster to cyclists if they see them directly through the windows rather than in a mirror. Mirrors often create more blind-spots and can increase the stress on drivers in cities. Therefore, Transport and Environment welcomes the approach of London to prioritise direct vision.

Transport and Environment suggests cities across Europe can learn from London's system, with the EU and UN considering establishing the London methodology as an international standard. This would reduce the burden on truck owners while also incentivising measures to improve city safety among policy makers.

Business Improvement Districts

Heart of London Business Alliance

Heart of London Business Alliance strongly agrees with the proposals for: the process for obtaining a vehicle star rating, the permit application process, safe system mitigating measures and enforcement. However, it raises concerns about the assumption that all accidents where HGVs and cyclists are involved is a fault of drivers, suggesting that best practice can be looked at in Europe and Holland for improving cyclist behaviour.

4.3 Campaign emails

We received an additional 4 identical emails with the wording believed to have originated from the same source supporting the Direct Vision Standard scheme but requiring additional safety equipment.

5 Next steps

We have reviewed and fully considered all of the feedback received as part of this consultation.

We are now holding the Phase 2c statutory consultation on the final scheme proposals and the Traffic Regulation Order (TRO) that will be used to implement the scheme.

Subject to a successful TRO application, we plan to make permits for the scheme available in October 2019 and begin enforcement of the scheme in October 2020.

Appendix A – Press advertisement

Have your say on making London's lorries safer

The Direct Vision Standard (DVS) forms part of the Mayor and TfL's Vision Zero approach to reducing road danger. The DVS rates Heavy Goods Vehicles (HGVs) on the level of a driver's direct vision from the HGV cab.

Under the proposals all HGVs over 12 tonnes would need to meet the minimum direct vision requirements or fit a 'Safe System' to improve the vehicles' safety. Permits will be available from October 2019.

We would like your views on our final scheme proposals, including the Safe System and permitting proposals.

To have your say visit tfl.gov.uk/direct-vision-standard or write to Freepost TfL Consultations.

Consultation will close on 18 February 2019.

Have
your
say



MAYOR OF LONDON



Appendix B – List of stakeholders consulted

Elected Members	
Ian Duncan Smith MP	Chingford and Woodford Green
Andrew Rosindell MP	Romford
Andrew Slaughter MP	Hammersmith
Virendra Kumar Sharma MP	Ealing, Southall
Bob Blackman MP	Harrow East
Bob Stewart MP	Beckenham
Thomas Brake MP	Carshalton and Wallington
James Brokenshire MP	Old Bexley and Sidcup
Karen Buck MP	Westminster North
Diane Abbott MP	Hackney North and Stoke Newington
Chuka Umunna MP	Streatham
James Clappison MP	Hertsmere
Clive Efford MP	Eltham
Jeremy Corbyn MP	Islington North
Jon Cruddas MP	Dagenham and Rainham
David Gauke MP	South West Hertfordshire
Emily Thornberry MP	Islington South and Finsbury
David Evennett MP	Bexleyheath and Crayford
Michael Fallon MP	Sevenoaks
Mike Gapes MP	Ilford South
Barry Gardiner MP	Brent North
Gareth Johnson MP	Dartford
Sarah Jones MP	Croydon Central
Cheryl Gillan MP	Chesham and Amersham
Chris Grayling MP	Epsom and Ewell
Justine Greening MP	Putney
Mark Field MP	Cities of London and Westminster
Stephen Hammond MP	Wimbledon
Harriet Harman MP	Camberwell and Peckham
Margaret Hodge MBE	Barking and Dagenham
Heidi Alexander MP	Lewisham
Meg Hillier MP	Hackney South and Shoreditch
Kate Hoey MP	Vauxhall
Marsha de Cordova MP	Battersea
Jo Johnson MP	Orpington
John Cryer MP	Leyton and Wanstead
Kwasi Kwarteng MP	Spelthorne
David Lammy MP	Tottenham
Lyn Brown MP	West Ham
Fiona Mactaggart MP	Slough
Greg Hands MP	Chelsea and Fulham
Matthew Offord MP	Hendon
Mike Freer MP	Golders Green
Bob Neill MP	Bromley and Chislehurst
Eric Pickles MP	Brentwood and Ongar
Richard Harrington MP	Watford

Rosena Allin-Khan MP	Tooting
Sam Gyimah MP	East Surrey
Grant Shapps MP	Welwyn Hatfield
Eleanor Laing MP	Epping Forrest
Stella Creasy MP	Walthamstow
Stephen Pound MP	Ealing North
Theresa Villiers MP	Chipping Barnet
Gareth Thomas MP	Harrow West
Stephen Timms MP	East Ham
Dominic Raab MP	Esher and Walton
Charles Walker MP	Broxbourne
Zac Goldsmith MP	Richmond Park and North Kingston
Steve Reed MP	Croydon North
Seema Malhotra MP	Felton and Heston
Dawn Butler MP	Brent
Tulip Siddiq MP	Hampstead and Kilburn
Keir Starmer MP	Holborn and St Pancras
Chris Philip MP	Croydon South
Rupa Huq MP	Ealing Central and Acton
Teresa Pearce MP	Erith and Thamesmead
Matthew Pennycook MP	Greenwich and Woolwich
John McDonnell MP	Hayes and Harlington
Ruth Cadbury MP	Brentford and Isleworth
Helen Hayes MP	Dulwich and West Norwood
Vicky Foxcroft MP	Lewisham Depford
Siobhain McDonagh MP	Mitcham and Morden
David Warburton MP	Somerton and Frome
Wes Streeting MP	Ilford North
Ed Davey MP	Kingston and Surbiton
Jim Dowd MP	Lewisham West
Dr Tania Mathias MP	Twickenham
Neil Coyle MP	Bermondsey and South Southwark
Paul Scully MP	Sutton and Cheam
Emma Dent Coade MP	Kensington
Nick Hurd MP	Ruislip, Northwood and Pinner
Joan Ryan MP	Enfield North
Bambos Charalambous	Enfield Southgate
Jim Fitzpatrick MP	Poplar and Limehouse
Boris Johnson MP	Uxbridge and South Ruislip
Catherine West MP	Hornsey and Wood Green
Kate Osanmor MP	Edmonton
Gareth Bacon AM	Bexley and Bromley
Jennette Arnold AM	North East
Len Duvall AM	Greenwich and Lewisham
Navin Shah AM	Brent and Harrow
Nicky Gavron AM	Londonwide
Tony Arbour AM	South West
Andrew Boff AM	Londonwide
Tom Copley AM	Londonwide
Joanne McCartney AM	Enfield and Haringey

Onkar Sahota AM	Ealing and Hillingdon
Fiona Twycross AM	Londonwide
Shaun Bailey AM	Londonwide
Susan Hall AM	Londonwide
Sian Berry AM	Londonwide
Leonie Cooper AM	Merton and Wandsworth
Unmesh Desai AM	City and East
Tony Devenish AM	West Central
Florence Eshalomi AM	Lambeth and Southwark
David Kurten AM	Londonwide
Keith Prince AM	Havering and Redbridge
Caroline Russell AM	Londonwide
Peter Whittle AM	Londonwide
Steve O'Connell AM	Croydon and Sutton
Caroline Pidgeon AM	Londonwide
Andrew Dismore AM	Barnet and Camden

Local Authorities
London Borough of Barking and Dagenham
London Borough of Barnet
London Borough of Bexley
London Borough of Brent
London Borough of Bromley
London Borough of Camden
City of London
London Borough of Croydon
London Borough of Ealing
London Borough of Enfield
Royal Borough of Greenwich
London Borough of Hackney
London Borough of Hammersmith and Fulham
Royal Borough of Kensington and Chelsea
London Borough of Haringey
London Borough of Harrow
London Borough of Hillingdon
London Borough of Hounslow
London Borough of Islington
London Borough of Richmond-Upon-Thames
Royal Borough of Kingston-Upon-Thames
London Borough of Lambeth
London Borough of Lewisham
London Borough of Merton
London Borough of Newham
London Borough of Redbridge
London Borough of Southwark
London Borough of Sutton
London Borough of Tower Hamlets
London Borough of Waltham Forest
London Borough of Wandsworth
London Borough of Westminster

Police and Health Authorities

Metropolitan Police

London Fire and Emergency Authority

London Fire Brigade

Transport Groups

Action on Lorry Danger

Association of British Drivers

British Cycling

Institute of Advance Motorists

See Me Save Me

Freight Best Practice

South London Freight Quality Partnership

RoadPeace

The Association of Bikeability Schemes

Central London Freight Quality Partnership

Central London Freight Quality Partnership

Motorcycle Industry Association

Clapham Transport Users Group

Living Streets

London TravelWatch

Cycling UK

London Cycling Campaign

Campaign for Better Transport

Sustrans

CTC

Wheels for Wellbeing

Disabled Motoring UK

London City Airport

Gatwick Airport

London Luton Airport

Stanstead Airport

Transport Focus

Motorcycle Action Group

British Motorcycling Association

AA Motoring Trust

RAC Foundation for Motoring

Association of Car Fleet Operators

Port of London Authority

Licensed Taxi Drivers Association

Office of Rail Regulation

Transport for Greater Manchester

Trade Associations

Road Haulage Association
Freight Transport Association
Mineral Products Association
Chartered Institute of Logistics and Transport
Construction Products Association
Engineering Employers Federation
Institute of Civil Engineers

Vehicle Manufacturers

Daimler AG
Mercedes-Benz UK Ltd
Volvo
RosRoca
Dennis Eagle
Scania
MAN Truck and Bus
DAF Trucks
Iveco Ltd
Renault Trucks

Construction and operators

Balfour Beatty
Interserve
Kier Group
Morgan Sindall
Amey UK
Gallaforde Try
Laing O'Rourke
Keller
Bam
Lsg
Skanska
Willmott Dixon
Mace
Costain
Sir Robert McAlpine
Wates
Vinci UK
J Murphy
Lakeside 1

CLOCS Operator or contractor

O'Donovan Waste Disposal
Cemex
FM Conway
Tarmac
Travis Perkins

Powerday
SIG
Day Group
Speedy Services
Keltbray
L Lynch Plant Hire
Erith
Bam Nuttall
Crossrail
HS2
Mace
Berkeley Homes
Land Securities
Brookfield Muliplex

Business Groups
Confederation of British Industry
Federation of Small Businesses
North East Chamber of Commerce
We Are Waterloo
Garratt Business Park BID
Victoria BID
Vauxhall One BID
Croydon BID
Clapham BID
London Riverside BID
Paddington BID
Canary Wharf Group
Hainault Business Park BID
E11 BID
Hammersmith London
Merton Chamber of Commerce
In Streatham
In Angel
New West End Company
Heart of London Business Alliance
Ilford Town BID
Kimpton Industrial Estate BID
Team London Bridge
Better Bankside
Independent Shoreditch
Fitzrovia Partnership
Baker Street Quarter Partnership Ltd

Appendix C – Stakeholder email

Dear Stakeholder

We have now developed our final proposals to introduce a new Heavy Goods Vehicles (HGVs) Safety Standard Permit Scheme following two previous phases of consultation in 2017 and 2018.

We are now seeking your views on these proposals with a particular focus on the HGV safety permit processes. This includes the process of obtaining a vehicle star rating, the safe system requirements, the permit application and administration process and the enforcement and appeals process.

The proposed scheme would require all HGVs over 12 tonnes to hold a Safety permit to enter or operate in Greater London. As part of DVS, HGVs will be rated between 'zero-star' (lowest) and 'five-star' (highest). The scheme will launch in October 2019 when operators will be able to apply for Safety Permits.

From October 2020, zero star HGVs would be banned unless they can demonstrate they operate in compliance with other measures in a defined safe system to minimise their risk to vulnerable road users.

By 2024, Zero, one and two star HGVs would be banned unless they can demonstrate compliance with an updated progressive safe system.

The proposed safe system includes specific industry recognised mitigating measures such as sensors, camera systems and visual warnings. The safety system would evolve over time, and be reviewed in 2024 in order to consider advances in technology.

From **Tuesday 8 January** you can let us know your views online at: www.tfl.gov.uk/direct-vision-standard. You can also write to us at FREEPOST TFL CONSULTATIONS or by email to: consultations@tfl.gov.uk.

We also invite you to an event on Friday 1 February 2019 to further discuss our final proposals.

This event is being held at **Palestra, 197 Blackfriars Road, London, SE1 8NJ from 9am – 12pm**. If you would like to attend, please RSVP to: DVS@tfl.gov.uk – it's likely that we will have to have a policy of one person per organisation due to capacity.

Please let us know your views by **Monday 18 February 2019**.

Yours faithfully



Alex Williams
Director of City Planning
Transport for London

Appendix D

Presentation from Stakeholder Event – [the slides will appear as a link on the consultation website](#)