

# Direct Vision Standards

Consultation results  
November 2017



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# 1 Introduction

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

## **About the proposals**

Much progress has been made through working in partnership with the freight industry to improve HGV safety, including HGV design, but we need to go further. Evidence shows that HGV drivers react more quickly using direct vision where they can see more of their surroundings directly through their windows, as opposed to indirectly through mirrors or monitors. This has the potential to reduce the risk of fatal or serious collisions.

The proposals included introducing a new simple Direct Vision Standard which would rate vehicles from zero (poor) to five star (excellent) based on how much a HGV driver can see directly from a vehicle cab, rather than through other equipment such as mirrors. The aim of which is to give regulators, manufacturers, operators and contractors an objective standard by which to rate and improve the safety of HGVs.

The proposals also included using this standard to ban or restrict HGVs with the most limited direct vision from London's roads.

## **About the consultation**

The consultation asked for views on the principle of introducing a Direct Vision Standard (DVS) which would have the potential to improve HGV safety.

Further questions were asked about the banning vehicles from London's roads with the lowest levels of visibility (zero rated vehicles from 2020 and vehicles rated 2 and below from 2024). The consultation also sought views on whether a DVS rating should be displayed on vehicles.

We also asked detailed questions to tailored audiences about the impact and operation of DVS which has been detailed further in this document.

The consultation ran from 24 January to 18 April 2017. Details of the proposals were available at [www.tfl.gov.uk/vision-standard-phase-one](http://www.tfl.gov.uk/vision-standard-phase-one)

## **About the results**

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

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

75% of consultation portal respondents thought that the DVS star rating should be displayed on the vehicle.

In total, we received responses from 62 key stakeholders.

A more detailed analysis of the results is shown in the following chapters of this document.

## **2 Consultation methodology**

### **Who was consulted**

The consultation was open to all. Details of the scheme were available to view on the TfL consultation portal.

TfL also wrote to a number of key stakeholders directly to seek their views. These included stakeholders such as London Boroughs and freight organisations. Please refer to Appendix A for a full stakeholder list and Appendix B for a copy of the stakeholder email.

### **Consultation material, distribution and publicity**

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

## **3 Methodology for analysis of consultation responses**

We undertook the analysis of the consultation in-house.

### **Analysis of closed question**

The survey was tailored in order to ascertain feedback on specific areas from targeted audience groups. The reporting on the closed questions reflect this. Where the questions were open to all audiences (5-8), the responses have been analysed and presented according to respondent type. Respondents were asked to identify themselves from one of several types in the online consultation questionnaire. In addition, there were some responses received directly via email. For analysis purposes, some of these respondent types have been grouped:

- As a member of the public
- As part of the freight industry, a grouping of:
  - A HGV operator
  - A HGV driver

- A HGV manufacturer, dealer, body builder or other involved in the manufacture or supply of vehicles
- An industry trade or other association
- A business that employs HGV operators
- Other
- A Government Organisation
- A community/voluntary group
- A business
- Other

The reporting methodology for the remainder of the closed questions has been explained further in this document.

### **Analysis of open questions**

Code frames were developed to structure the analysis of responses to the open questions (questions 9 and 14). There was one open question that was open to all respondents. Further opportunities to provide additional comments were available to targeted audience types.

A code frame was developed to analyse comments broken down into themes including implementation, safety, financial, impacts and considerations, safety and other.

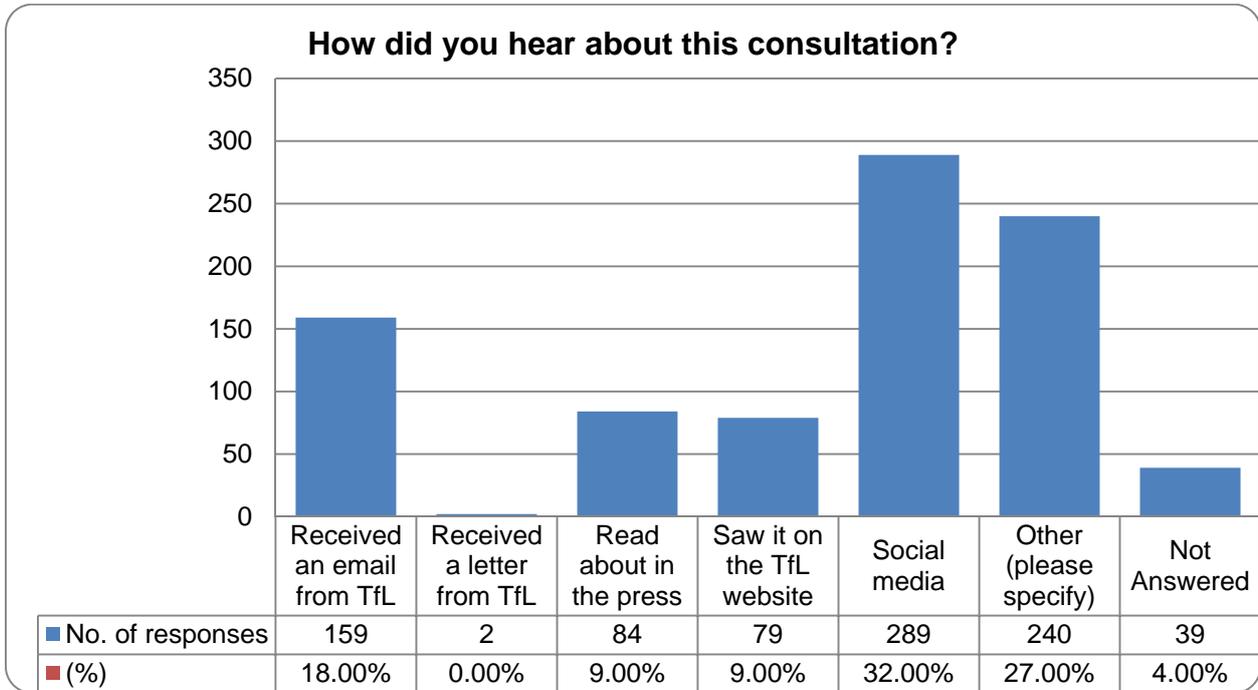
## **2 Analysis of responses to closed questions and additional technical comments**

This analysis includes 892 responses, consisting of responses received from the general public and those stakeholders that responded to the consultation via the portal. Questions 1-4 and 11 sought information about the person(s) responding to the consultation.

### **Question 4: How did you hear about this consultation?**

Figure 1. Respondents were asked to provide information about how they heard about the DVS consultation. The largest proportion of respondents (32%) heard about the consultation through social media, 18% received an email from TfL and 9% respectively either read about it in the press or saw information about it on the TfL website.

**Figure 1. Awareness of consultation**

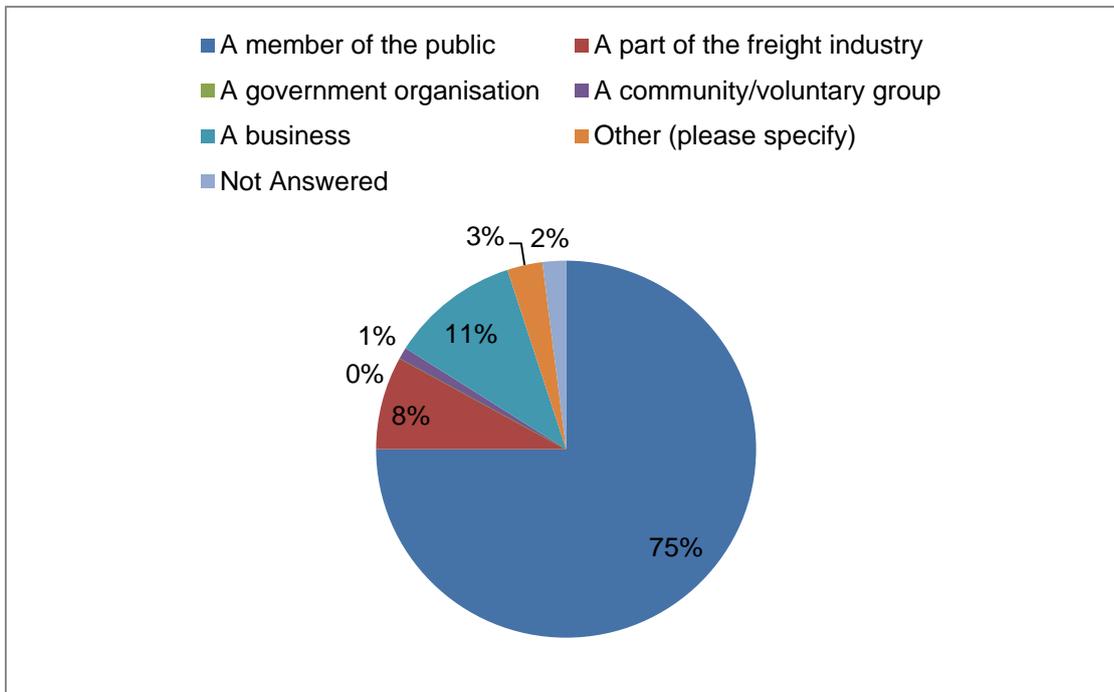


### **Question 11: Respondent type**

Respondents could give their views on the consultation via the online portal identifying their respondent type. However, those who sent an email did not identify themselves in the same way. Email responses could therefore be responding as individuals, on behalf of an organisation or as a HGV driver, but this is not indicated in their response.

The majority of respondents were individuals responding as members of the public – 75%. 8% of respondents were part of the freight industry, 1% were part of a community voluntary group and 11% were responding on behalf of a business.

**Figure 2: Respondent type**

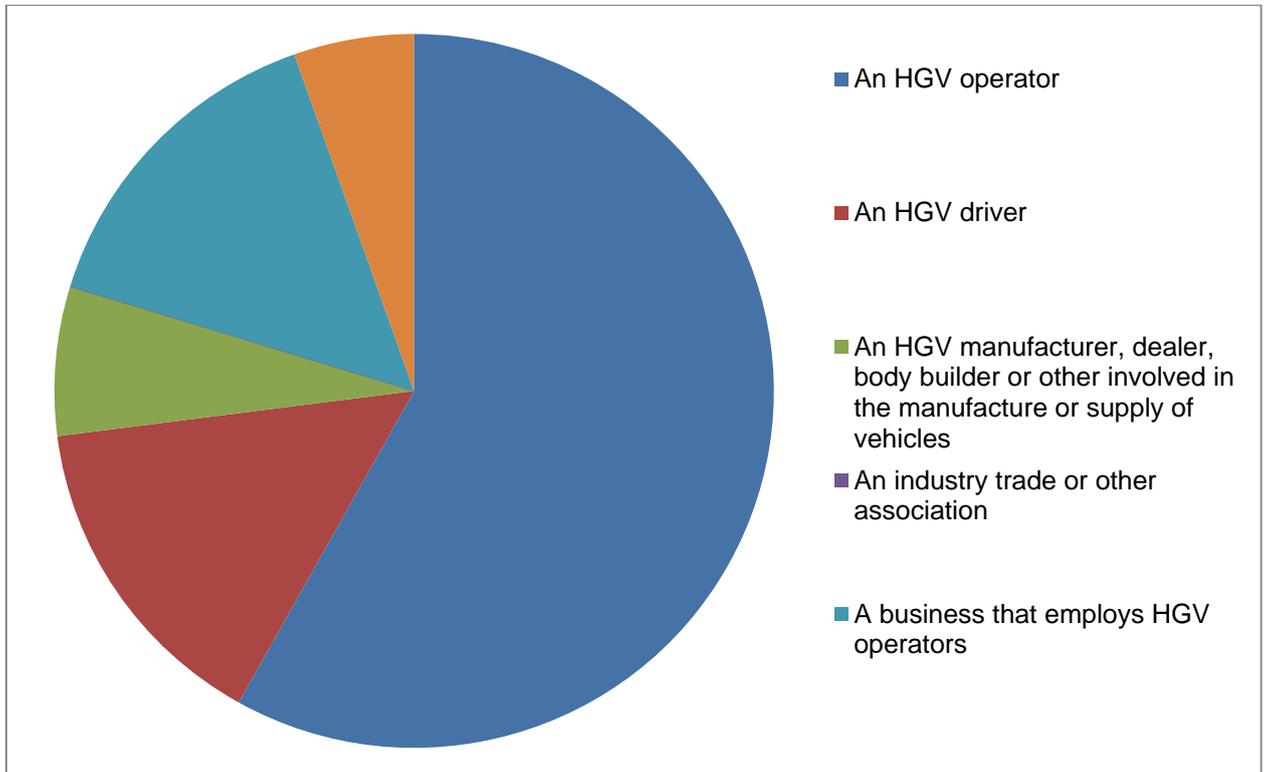


Option	Number of responses	%
A member of the public	667	<b>75%</b>
A part of the freight industry	74	<b>8%</b>
A government organisation	1	<b>0%</b>
A community/voluntary group	5	<b>1%</b>
A business	96	<b>11%</b>
Other	29	<b>3%</b>
Not answered	20	<b>2%</b>
<b>Total</b>	<b>892</b>	<b>2%</b>

**Question 12: Breakdown of freight industry**

Of the 74 respondents that identified themselves as being part of the freight industry, question 12 further drilled down specific areas within this field. The largest number of responses received (58%) were from HGV operators.

**Figure 3: Make-up of the freight industry**



Option	Number of responses	% of freight industry
HGV operators	43	58%
A HVG driver	11	15%
An HGV manufacturer, dealer, body builder or other involved in the manufacture or supply of vehicles	5	7%
An industry trade or other association	0	0%
A businesses that employs HGV operators	11	15%
Other	4	5%
<b>Total</b>	<b>74</b>	<b>100%</b>

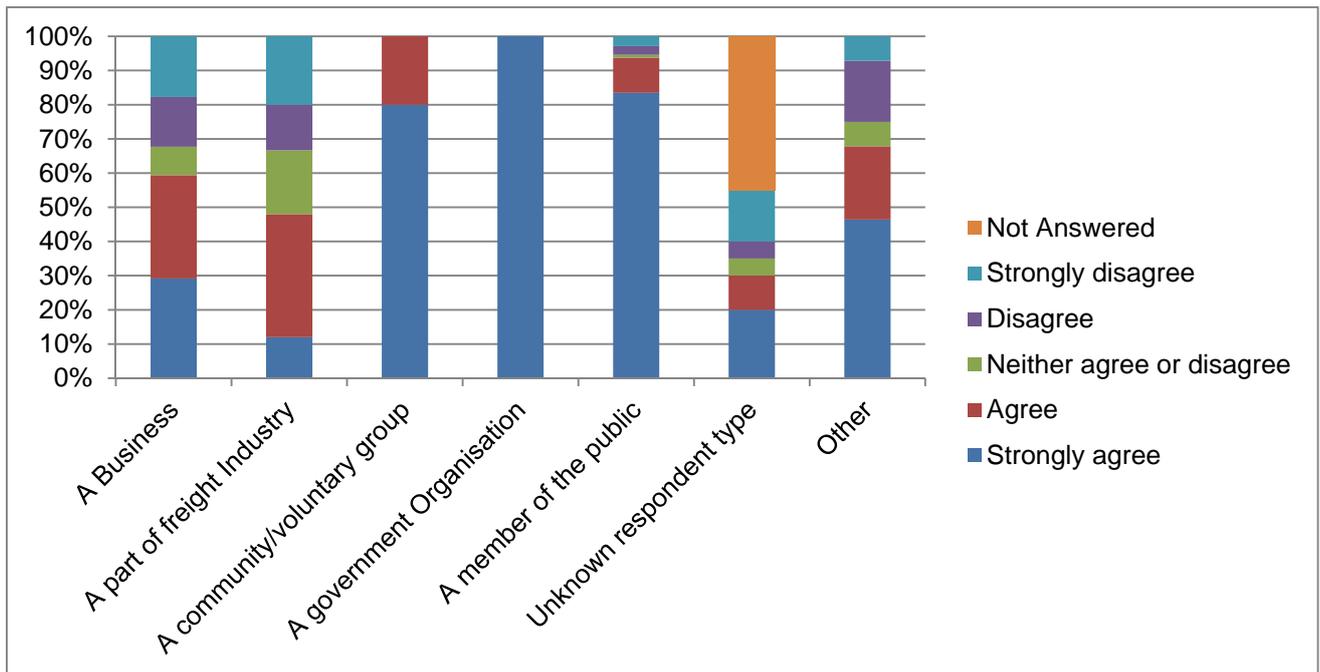
*\*NB –For questions 5-8, the responses have been analysed and presented according to respondent type*

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

Respondents were first asked if they support the adoption of a DVS.

Figure 4 4 shows the responses to this question by respondent type. It shows that, among all respondents, 84% agree or strongly agree with the measure. Respondents employed in the freight industry were the least supportive; 33% of this group tended to disagree or strongly disagree to the proposal.

**Figure 4: Support for adopting a DVS**



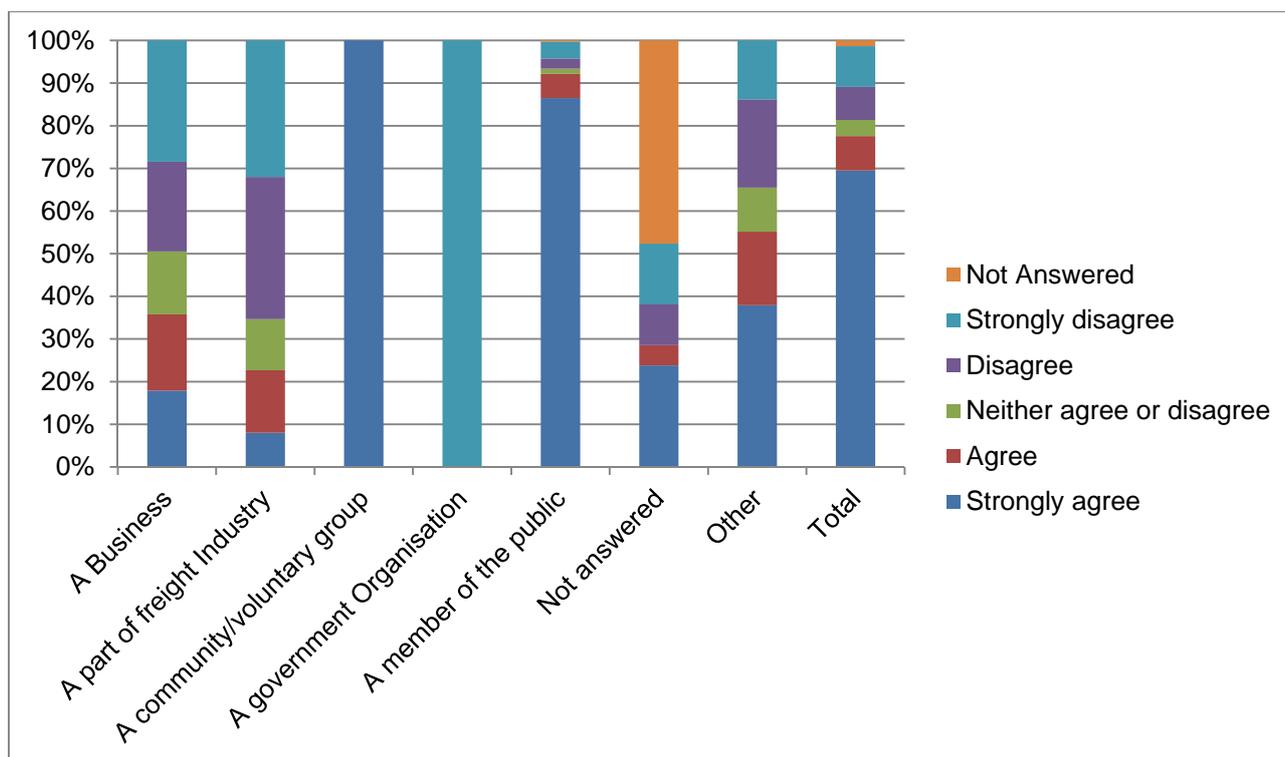
	Business	Freight industry	Community voluntary	Government	Public	Not answered	other	Total	%
Strongly agree	28	9	4	1	557	4	3	<b>616</b>	<b>69%</b>
Agree	29	27	1	0	68	2	6	<b>133</b>	<b>15%</b>
Neither agree or disagree	8	14	0	0	6	1	2	<b>31</b>	<b>4%</b>
Disagree	14	10	0	0	17	1	5	<b>47</b>	<b>5%</b>
Strongly disagree	17	15	0	0	19	3	2	<b>56</b>	<b>6%</b>
Not answered	0	0	0	0	0	9	0	<b>9</b>	<b>1%</b>
<b>Total</b>	<b>96</b>	<b>74</b>	<b>5</b>	<b>1</b>	<b>667</b>	<b>20</b>	<b>28</b>	<b>892</b>	

**Question 6: To what extent do you agree that HGVs with the least direct visibility and therefore a 'zero' DVS rating should be banned from London's streets by January 2020?**

Respondents were first asked if they agree with banning zero rated vehicles in London from 2020.

Figure 5 shows the responses to this question by respondent type. It shows that, among all respondents, 78% agree or strongly agree with the measure. Respondents employed in the freight industry were the least supportive; 65 % of this group tended to disagree or strongly disagree to the proposal.

**Figure 5: Support for banning zero rated vehicles from 2020**



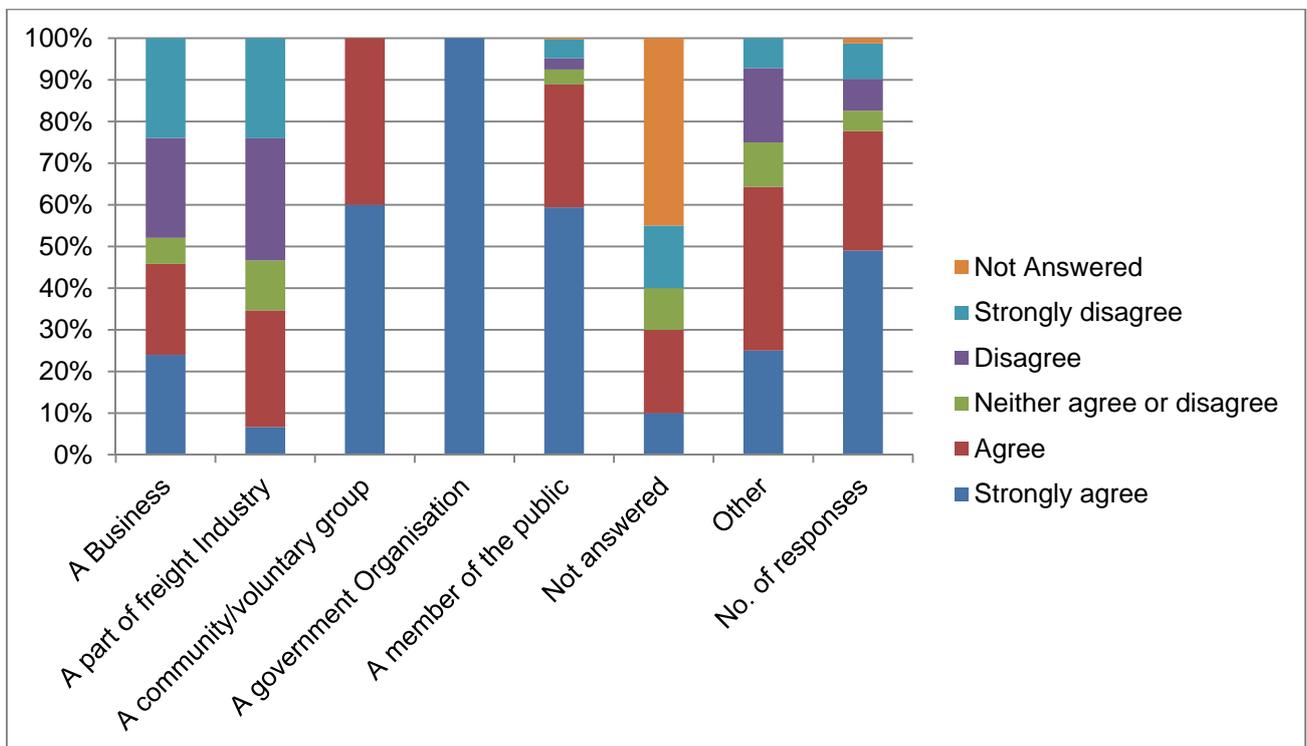
	Business	Freight industry	Community voluntary	Government	Public	Not answered	other	Total	%
Strongly agree	17	6	5	0	576	5	11	<b>620</b>	<b>70%</b>
Agree	17	11	0	0	38	1	5	<b>72</b>	<b>8%</b>
Neither agree or disagree	14	9	0	0	8	0	3	<b>34</b>	<b>4%</b>
Disagree	20	25	0	0	16	2	6	<b>69</b>	<b>8%</b>
Strongly disagree	27	24	0	1	26	3	4	<b>85</b>	<b>10%</b>
Not answered	0	0	0	0	2	10	0	<b>12</b>	<b>1%</b>
<b>Total</b>	<b>95</b>	<b>74</b>	<b>5</b>	<b>1</b>	<b>666</b>	<b>21</b>	<b>29</b>	<b>892</b>	

**Question 7: To what extent do you agree that only HGVs with a ‘good’ direct visibility or ‘three star’ DVS rating and above should be allowed on London’s streets by 2024?**

Respondents were first asked if they agree with banning vehicles rated two and below from London from 2024.

Figure 4 6 shows the responses to this question by respondent type. It shows that, among all respondents, 78% agree or strongly agree with the measure. Respondents employed in the freight industry were the least supportive; 53 % of this group tended to disagree or strongly disagree to the proposal.

**Figure 6: Agree with banning vehicles rated 2 and below from 2024**



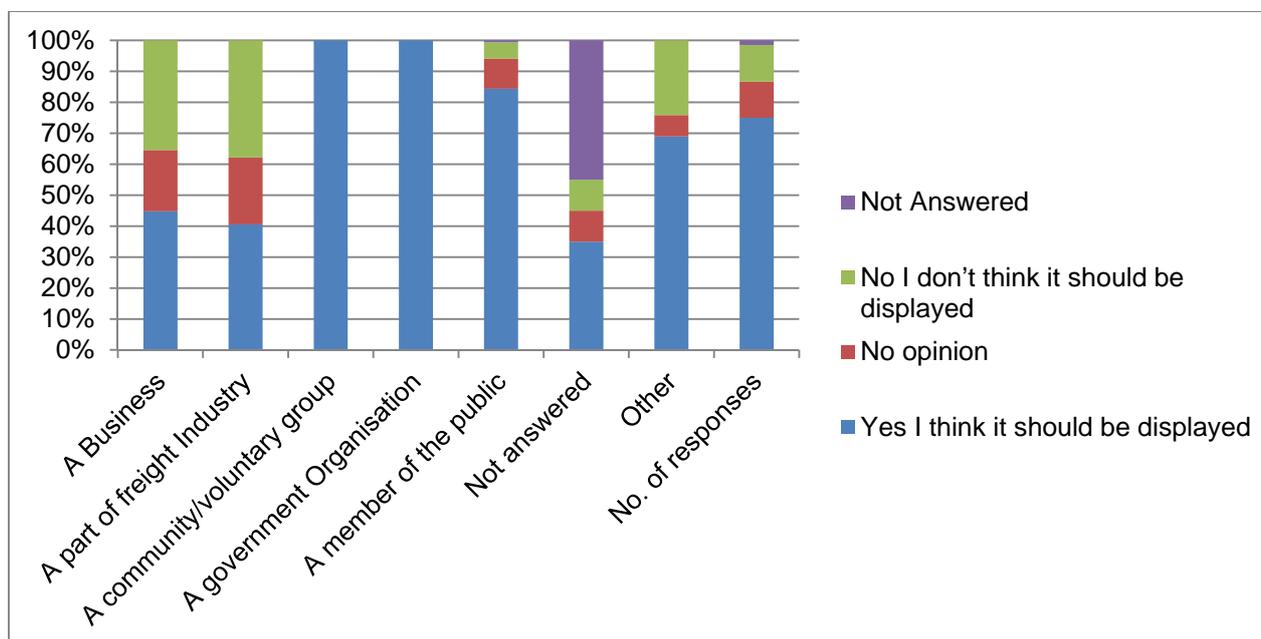
	Business	Freight industry	Community voluntary	Government	Public	Not answered	other	Total	%
Strongly agree	23	5	3	1	396	2	7	437	49%
Agree	21	21	2	0	197	4	11	256	29%
Neither agree or disagree	6	9	0	0	24	2	3	44	5%
Disagree	23	22	0	0	18	0	5	68	8%
Strongly disagree	23	18	0	0	30	3	2	76	9%
Not answered	0	0	0	0	2	9	0	11	1%
<b>Total</b>	<b>96</b>	<b>74</b>	<b>5</b>	<b>1</b>	<b>667</b>	<b>20</b>	<b>28</b>	<b>892</b>	

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

Respondents were asked if they would like to see the DVS star rating displayed on the vehicle.

Figure 7 shows the responses to this question by respondent type. It illustrates that, amongst all respondents, 75% think that the DVS rating should be displayed. Support for this proposal was highest amongst the Community/Voluntary and Government sectors with 100% of these respondent groups agreeing that the rating should be displayed.

**Figure 7: Display of DVS rating**



	Business	Freight industry	Community voluntary	Government	Public	Not answered	other	Total	%
Yes I think it should be displayed	43	30	5	1	563	7	20	<b>669</b>	<b>75%</b>
No opinion	19	16	0	0	65	2	2	<b>104</b>	<b>12%</b>
No I don't think it should be displayed	34	28	0	0	35	2	7	<b>106</b>	<b>12%</b>
Not answered	0	0	0	0	4	9	0	<b>13</b>	<b>1%</b>
<b>Total</b>	<b>96</b>	<b>74</b>	<b>5</b>	<b>1</b>	<b>667</b>	<b>20</b>	<b>29</b>	<b>892</b>	

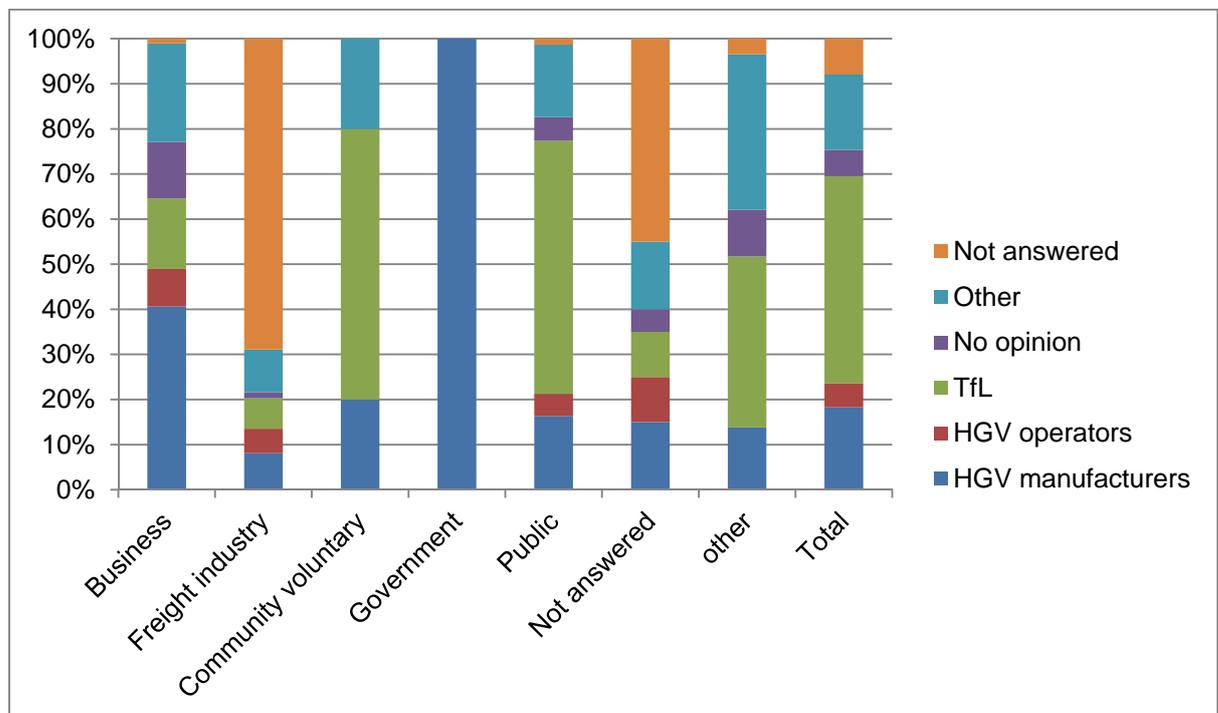
### Questions 13, 15 and 27: Who do you think should be responsible for producing the DVS star ratings for HGVs?

Respondents were asked who they thought should be responsible for developing a HGV star rating.

Figure 8 shows the responses to this question by respondent type. It illustrates that 46% of all respondents think that TfL should be responsible for developing the rating system. Although a greater proportion of businesses and the freight industry thought that the rating system should be developed by HGV manufacturers.

This question was open to all respondents, but duplicated as a result of the design of the questionnaire.

**Figure 8: Production of the DVS star ratings**



	Business	Freight industry	Community voluntary	Government	Public	Not answered	other	Total	%
HGV manufacturers	39	6	1	1	109	3	4	<b>163</b>	<b>18%</b>
HGV operators	8	4	0	0	33	2	0	<b>47</b>	<b>6%</b>
TfL	15	5	3	0	374	2	11	<b>410</b>	<b>46%</b>
No opinion	12	1	0	0	35	1	3	<b>52</b>	<b>6%</b>
Other	21	7	1	0	107	3	10	<b>149</b>	<b>17%</b>
Not answered	1	51	0	0	9	9	1	<b>71</b>	<b>8%</b>
<b>Total</b>	<b>96</b>	<b>74</b>	<b>5</b>	<b>1</b>	<b>667</b>	<b>20</b>	<b>29</b>	<b>892</b>	<b>100%</b>

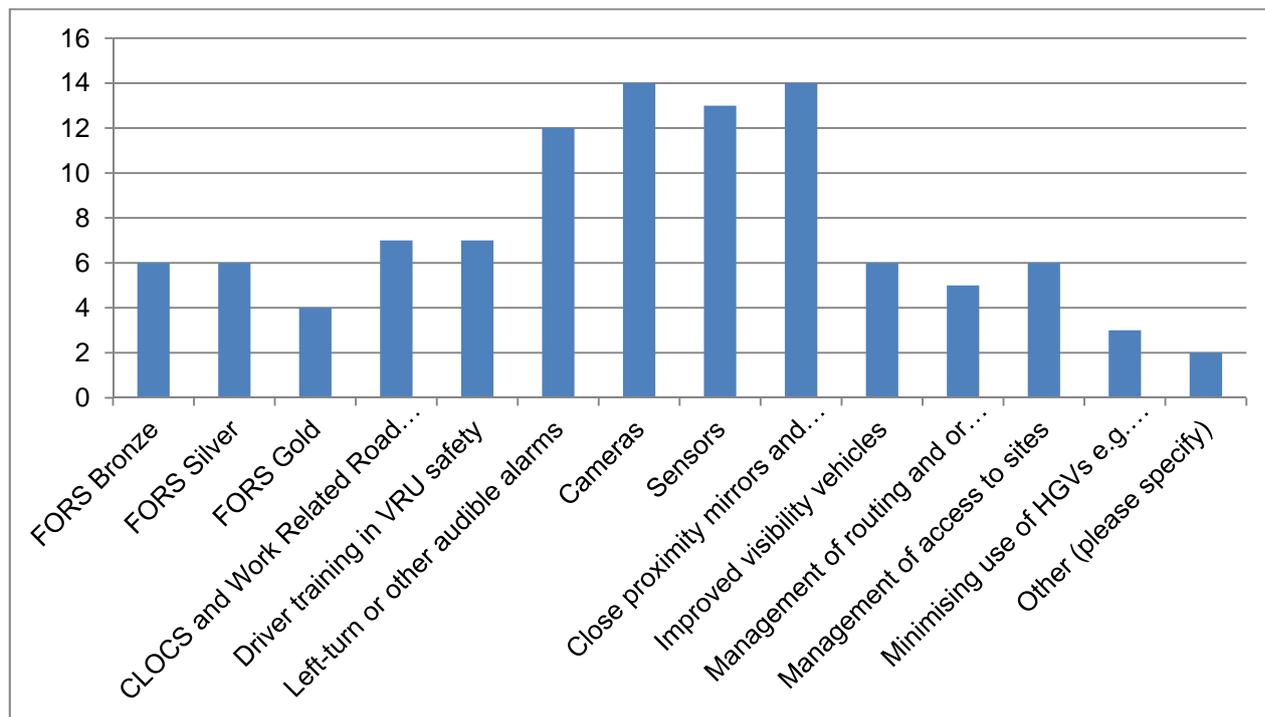
*\*NB questions 17 – 26 only contain responses from those who identified themselves as either HGV manufactures, , industry trade, business that employs HGV operators, other(i.e.20 responses).*

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

These respondents industry was asked if they are already taking action to improve HGV safety. Respondents were able to select multiple choices.

Figure 9 illustrates that the most popular actions and interventions to improve HGV safety are cameras, close proximity mirrors and sideguards and sensors.

**Figure 9: Action taken to improve HGV safety**

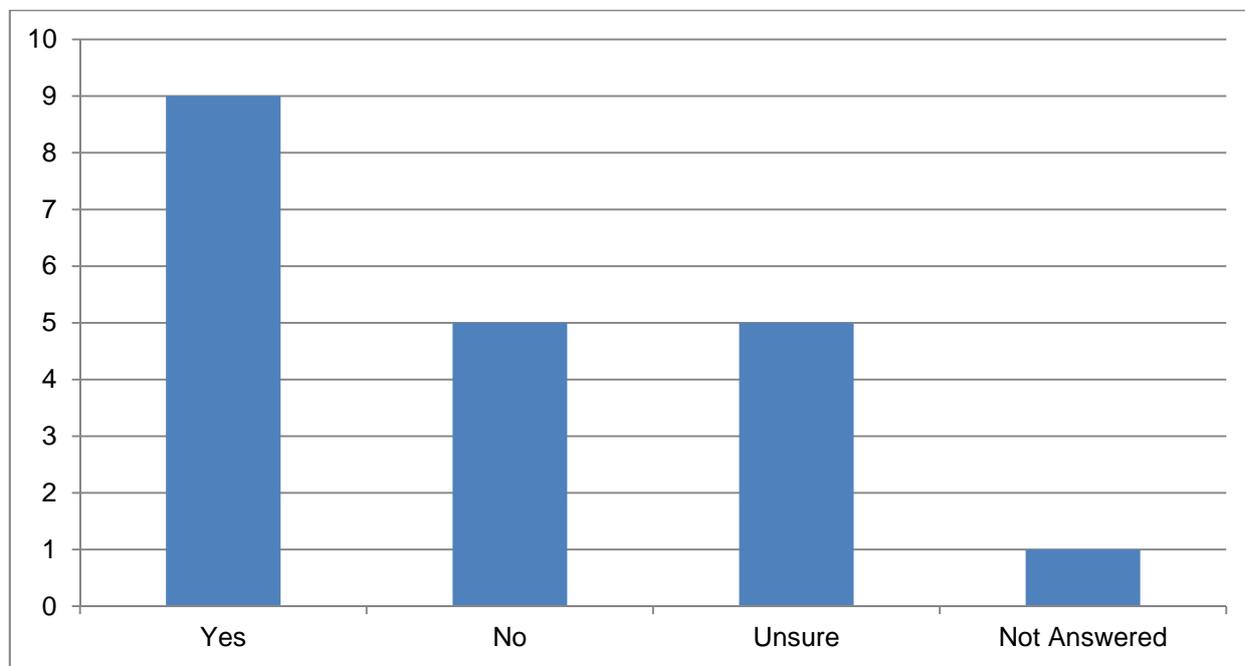


Option	No. of responses	% of these respondents
FORS Bronze	6	30%
FORS Silver	6	30%
FORS Gold	4	20%
CLOCS and Work Related Road Risk (WRRR)	7	35%
Driver training in VRU safety	7	35%
Left-turn or other audible alarms	12	60%
Cameras	14	70%
Sensors	13	65%
Close proximity mirrors and sideguards	14	30%
Improved visibility vehicles	6	30%
Management of routing and or scheduling	5	25%
Management of access to sites	6	30%
Minimising use of HGVs e.g. consolidation, use of rail/river	3	15%
Other	2	10%

**Questions 18 and 19: Do you think any of your HGVs will be affected by the ‘zero star’ ban in 2020?**

These respondents were asked if any of their HGVs will be affected by the zero star ban. Figure 10 illustrates the level of impact. 45% think that the zero star ban will affect them.

**Figure 10: HGVs affected by HGV ban**



Option	No. of responses	% of these respondents
Yes	9	45%
No	5	25%
Unsure	5	25%
Not answered	1	5%
<b>Total</b>	<b>20</b>	<b>100%</b>

Of those that responded ‘yes’ to the question (above) about the ‘zero star’ ban in 2020, the following table shows what percentage of the respondents fleet which is thought to be affected.

**Figure 11: % of fleet affected**

Respondent No	Answer
1	15%
2	50%
3	10%
4	Not applicable
5	20%
6	100%
7	50%
8	100%
9	90%

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

These respondents were questioned if they have already started to make changes in advance of a DVS scheme.

Figure 12 illustrates whether the freight industry have begun to make changes.

**Figure 12: Whether the freight industry is planning for DVS scheme.**

Option	No. of responses	% of these respondents
Yes	9	45%
No	10	50%
Not answered	1	5%
<b>Total</b>	<b>20</b>	<b>100%</b>

These respondents were asked to provide a reason for whether they are making changes to prepare for DVS or not. Figure 3 outlines the reasons provided.

**Figure 13: Reasons for making changes to prepare for DVS scheme**

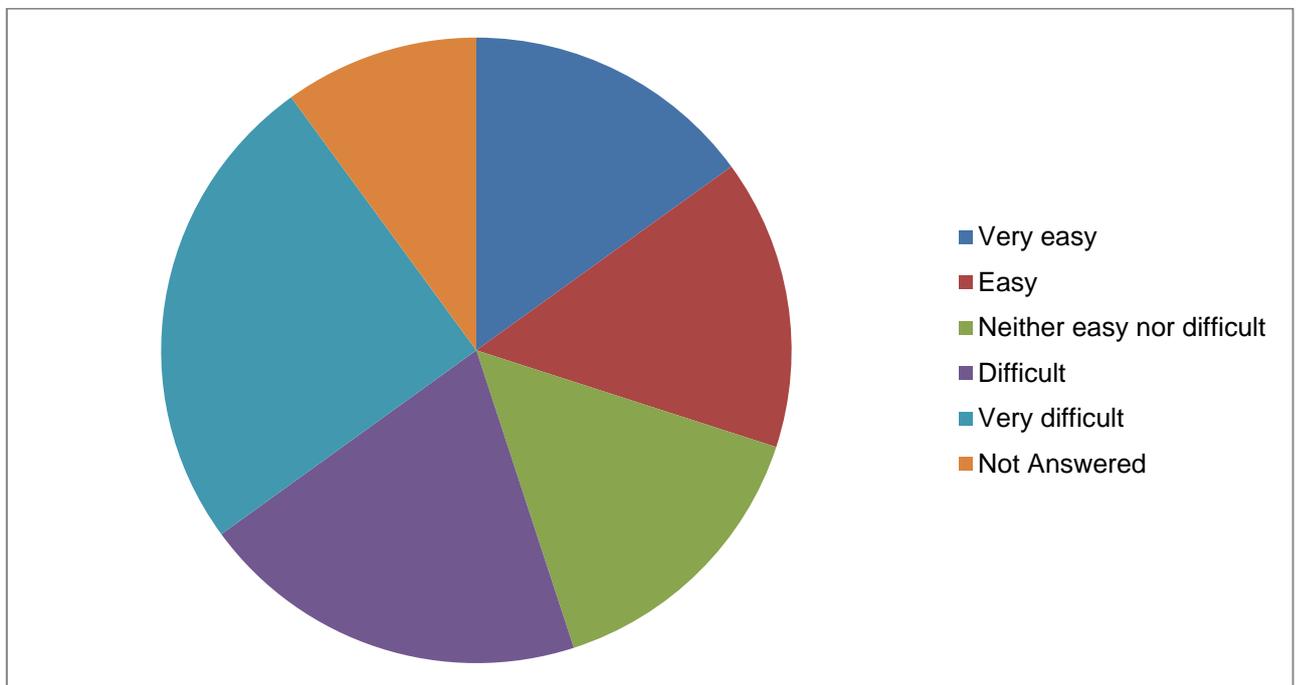
If no, why not	Number
Cost implication	3
Equipment changed every five years so DVS will be considered at next cycle	1
We already invested in camera/warning systems, seems the goal post is being moved yet again	1
We also move wide or long loads which are already controlled by existing licencing	1
We operate Hiab based vehicles which reduce the need for a separate crane vehicle	1
Waiting for an indication of potential details before making any changes	2
If yes, what changes have you made?	Number
Buying new fleet/change size of trailer	1
Designing to meet and exceed the standard	1
Looking to source spaces in manufacturer build books, alternative suppliers	1
Moving older vehicles away from London	1
Replacement by 2020	1
Using a low windscreen Mitsubishi Canter which is likely to meet class V & V1 mirrors	1
Considering whether to increase prices in order to meet cost of compliance	1

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

We asked these respondents if it would be easy or difficult to comply with a DVS scheme. 12% of these respondents reported it would be difficult or very difficult to comply. Please see figure 14 below.

**Figure 14: Ease of compliance**

Option	No. of responses	% of these respondents
Very Easy	3	15%
Easy	3	15%
Neither Easy or difficult	3	15%
Difficult	4	20%
Very difficult	5	25%
Not answered	2	10%
<b>Total</b>	<b>20</b>	<b>100%</b>



**Question 22: Do you think the proposed ban on ‘zero star’ rated HGVs will impact your business, members or operation?**

We asked these respondents if and how a DVS zero star ban would impact their business or operation. 70% of these respondents reported that they would be impacted. Please refer to Figure 15 below.

**Figure 15: Impact on business**

Option	No. of responses	% of these respondents
Yes	14	70%
No	3	15%
Unsure	2	10%
Not answered	1	5%
<b>Total</b>	<b>20</b>	<b>100%</b>

Respondents were asked to provide details of how their business or operation might be impacted. Figure 16 details the reasons provided.

**Figure 16: Details of impact on business or operation**

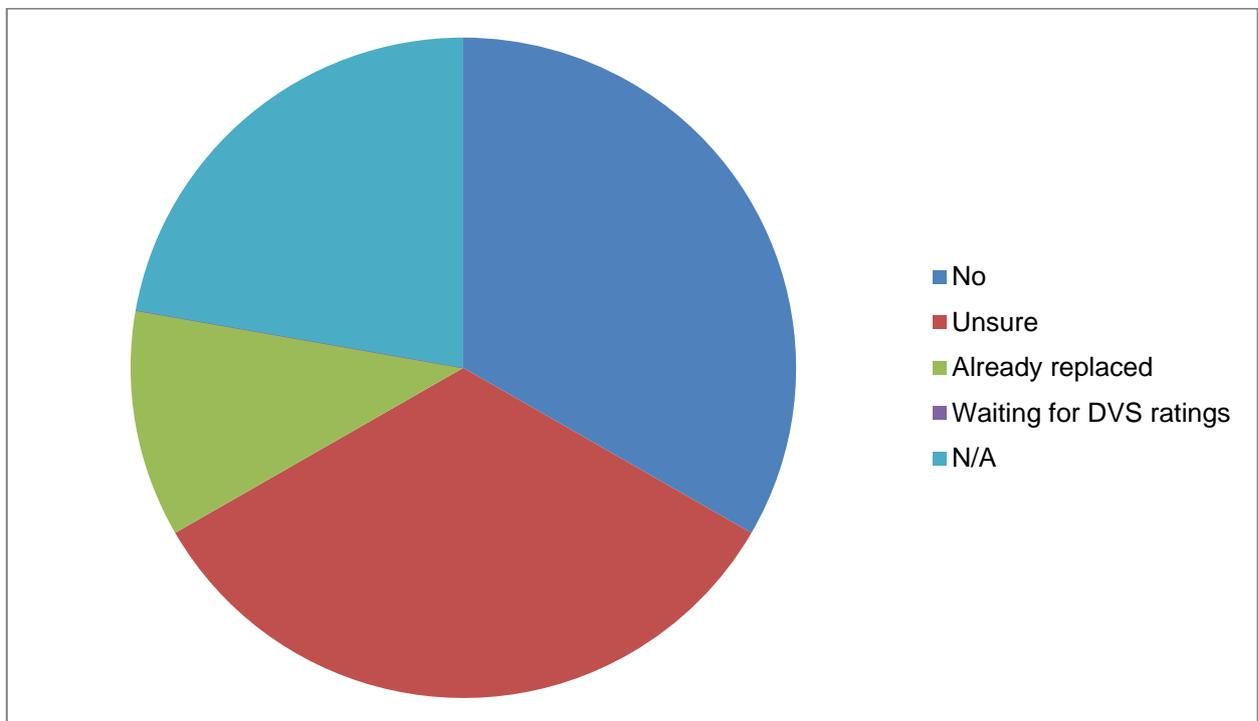
Impact	Number
Not delivering to London	1
Potential loss of business	2
We will benefit as a provider of compliant vehicles	1
Unable to comply	1
Replace/modify vehicles	1
Significant additional cost & there is a doubt if there'll be sufficient vehicles available	2
Unrealistic timescale given	1

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

We asked these respondents if they thought any of their fleet would need to be replaced to meet the new ULEZ Euro VI requirements. Figure 17 details the industry's response to this question.

**Figure 17: Replacing fleet to meet Euro VI ULEZ requirements**

Option	No. of responses	% of these respondents
Yes	11	55%
No	3	4%
Unsure	3	4%
Already replaced	1	1%
Waiting for DVS ratings	0	0%
N/A	2	3%
<b>Total</b>	<b>20</b>	<b>100%</b>

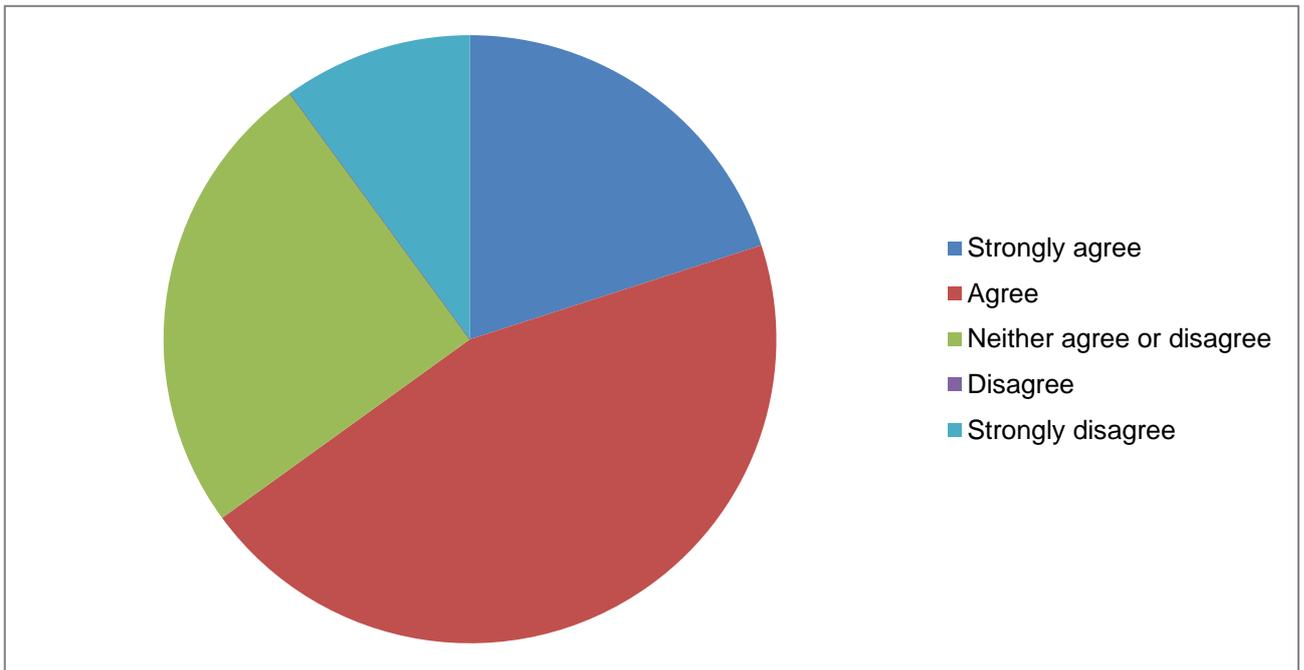


**Question 24: To what extent do you agree that the geographical boundary of the proposed ULEZ and DVS schemes should be the same?**

These respondents were asked if they thought that the geographical boundary for both the DVS and ULEZ schemes should be identical. Figure 18 illustrates their views on this matter.

**Figure 18: Boundary area for ULEZ and DVS**

Option	No. of responses	% of these respondents
Strongly agree	4	20%
Agree	9	45%
Neither agree or disagree	5	25%
Disagree	0	0%
Strongly Disagree	2	10%
<b>Total</b>	<b>20</b>	<b>100%</b>



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

Respondents were asked if they had any additional comments on the alignment of schemes that may affect HGV operators. Three additional comments were provided. Please refer to figure 19 below.

**Figure 19: Comments about alignment of schemes**

Comments	Number
Direct Vision and LoCity streams should work together	1
Put them all under one control to reduce the administration costs	1
Simplify and streamline the rules and processes	1

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

Respondents were asked if they thought that there were any further considerations in terms of implementing DVS. Two additional comments were provided. Please refer to figure 20 below.

**Figure 20: Comments about further considerations**

Comments	Number
The redesign of large vehicles to offer greater DIRECT vision will incur significant costs	1
Use of word 'DIRECT' is very restrictive in the choice of vehicles currently available	1

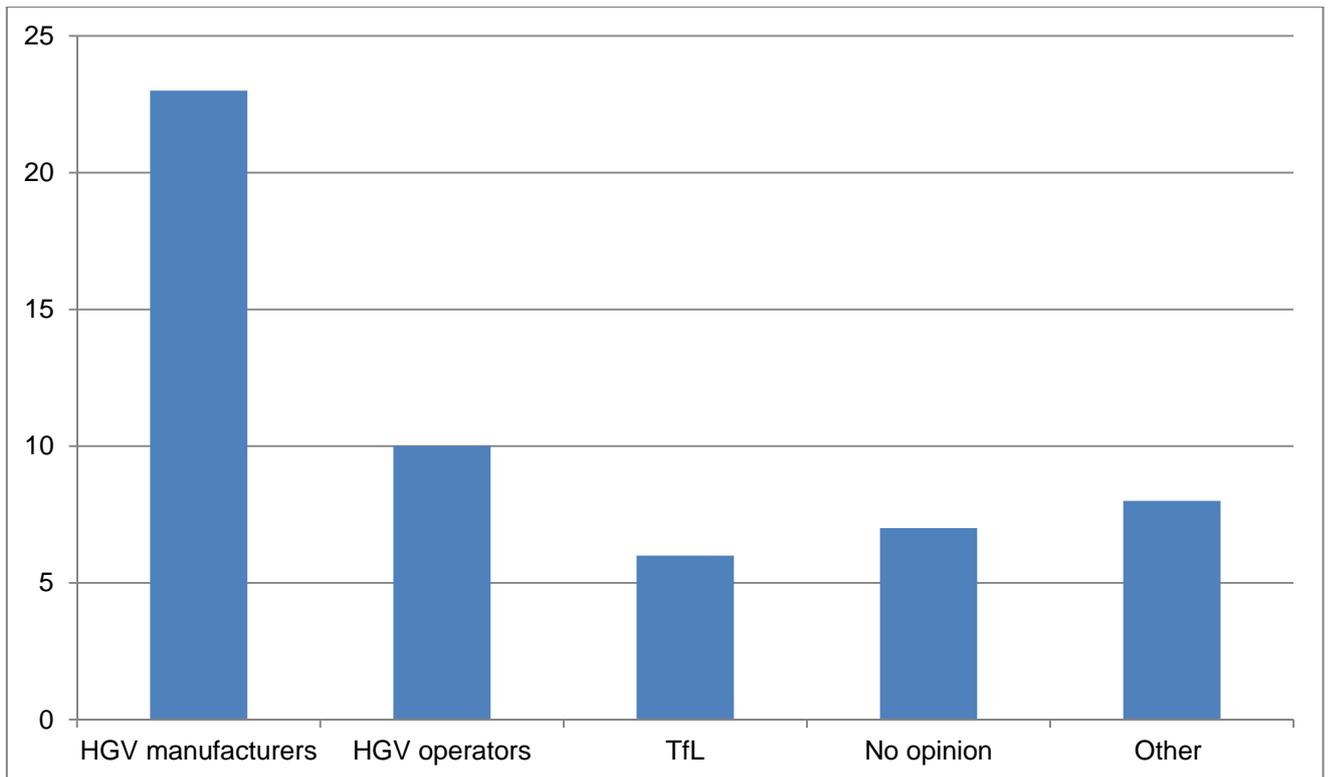
*\*NB questions 27 –50 only contain responses from those who identified themselves as part of HGV driver/operators (i.e.54 responses).*

**Question 27: Who do you think should be responsible for producing the DVS star ratings for HGVs?**

These respondents were asked who they thought should be responsible for producing the DVS star ratings. The most popular choice was HGV manufacturers at 43%. Please refer to figure 21 below.

**Figure 21: Responsibility for producing DVS ratings**

Option	No. of responses	% of these respondents
HGV manufacturers	23	43%
HGV operators	10	19%
TfL	6	11%
No opinion	7	13%
Other	8	15%
<b>Total</b>	<b>54</b>	<b>100%</b>



**Question 28: Please provide any further comments on the more detailed principles and/or technical aspects of the DVS as developed to date**

Respondents were asked to provide additional technical comments. Two additional comments were provided. Please refer to figure 22 below.

**Figure 22: Comments about further considerations**

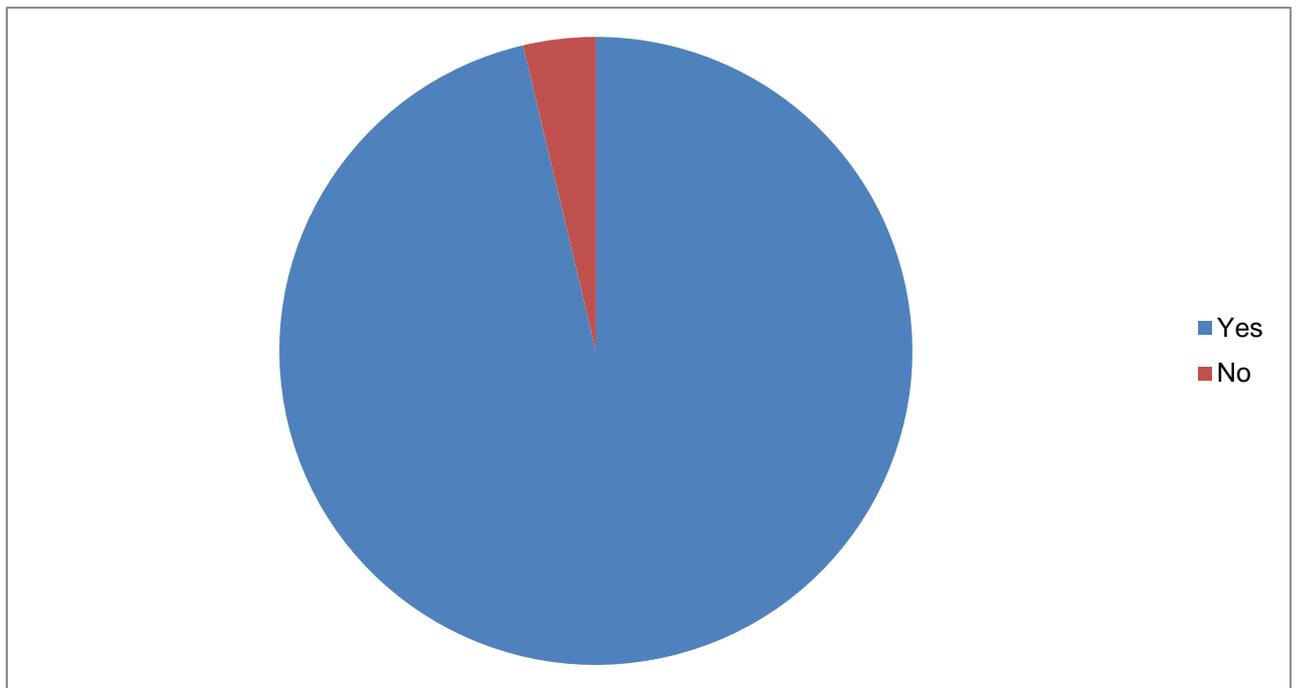
Comments	Number
DVS adds weight to vehicles meaning vehicles carry less thus sending more vehicles into London	2
Too many additions to the cab will distract the drivers	4
Modern vehicles are very well equipped with sensors and all mod cons as standard/ extra changes not needed	2
Windows in door idea	1
Educate VRUs instead to be more aware/alert	1
HGV drivers should have the bigger voice in this matters as they understand the industry better	1
HGV manufacturers are best poised to develop and offer DVS on their vehicles	1
Rating should be set by an independent trade body, but needs to be done ASAP	1

**Question 29: Are you already taking specific action within your business to tackle HGV and vulnerable road user safety?**

We asked these respondents if they are already taking addressing HGV and vulnerable road user safety by taking action. 96% confirmed that they already are. Please refer to figure 23 below.

**Figure 23: taking specific action to improve HGV and vulnerable road user safety**

Option	No. of responses	% of these respondents
Yes	52	96%
No	2	4%
<b>Total</b>	<b>54</b>	<b>100%</b>



### Question 30: Actions taken

Of those that responded 'yes' to the question (above), they also provided information about actions that are already being taken. Please refer to figure 24 below.

**Figure 24: Action taken to improve HGV safety**

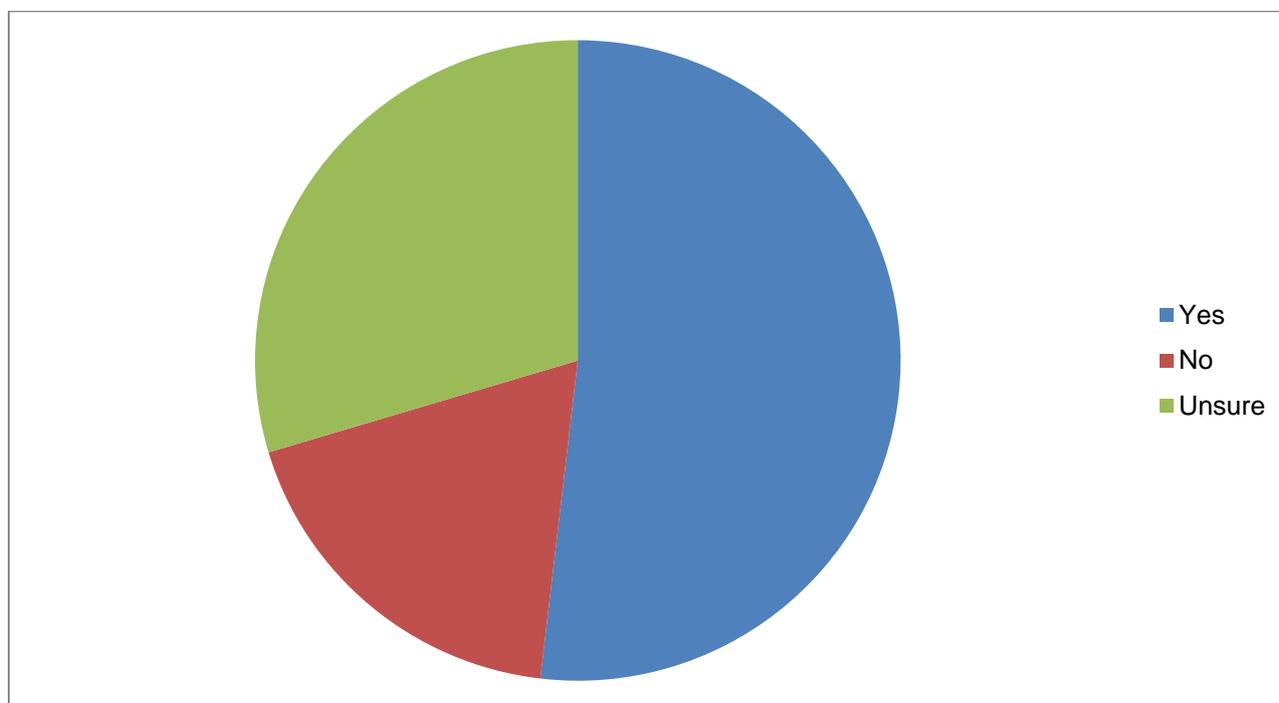
Option	No. of responses	% of these respondents
FORS Bronze	25	46%
FORS Silver	20	37%
FORS Gold	15	28%
CLOCS and Work Related Road Risk (WRRR)	23	43%
Driver training in VRU safety	38	70%
Left-turn or other audible alarms	41	76%
Cameras	44	81%
Sensors	39	72%
Close proximity mirrors and sideguards	47	87%
Improved visibility vehicles	19	35%
Management of routing and or scheduling	29	53%
Management of access to sites	20	37%
Minimising use of HGVs e.g. consolidation, use of rail/river	7	13%
Other	3	6%

### Question 31: Do you think any of your HGVs will be affected by the 'zero star' ban in 2020?

We asked these respondents if their HGV fleet would be affected by the zero star ban. 51% stated that they would be. Please refer to figure 25 and 26 below.

**Figure 25: HGVs affected by zero star ban**

Option	No. of responses	% of these respondents
Yes	28	51%
No	10	19%
Unsure	16	30%
<b>Total</b>	<b>54</b>	<b>100%</b>



Of those that responded 'yes' to the question (above) about the 'zero star' ban in 2020, the following table shows what percentage of the respondents fleet which is thought to be affected.

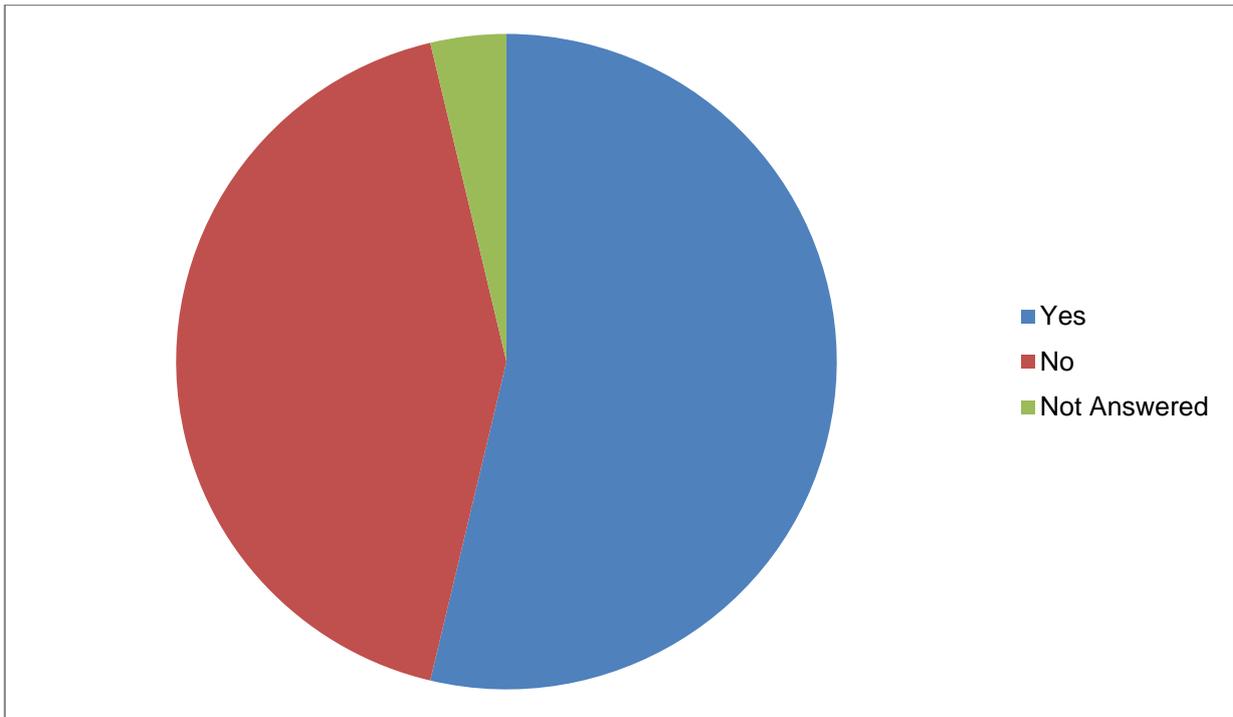
**Figure 26: % of fleet affected**

% of fleet	No of responses
100%	12
75%	2
50%	2
40%	1
33%	1
25%	2
10%	2
2%	1
Other	3
Not answered	2
<b>Total</b>	<b>28</b>

**Question 32: Have you started to consider making changes within your business to prepare for any future DVS scheme?**

We asked these respondents if they had begun to prepare for a DVS scheme by making changes. Figure 27 shows that 54% have begun to make changes.

Option	No. of responses	% of these respondents
Yes	29	54%
No	23	42%
Not answered	2	4%
<b>Total</b>	<b>54</b>	<b>100%</b>



These respondents were asked to provide a reason for whether they are making changes to prepare for DVS or not. Figure 27 outlines the reasons provided. The most frequently mentioned comment stated referred to ceasing deliveries in London as a result of DVS.

**Figure 27: Reasons for making changes to prepare for DVS scheme**

If no, why not	Number
Consultation not complete	1
Cost implication of making changes	3
Cost of replacing the fleet will prevent operators from being able to comply	1
Inconvenience to customers	1
Money invested in March 2016 to make vehicle Euro 6 standard compliant not yet paid off	2
Our XF is equipped with all legally required mirrors along with, proximity sensors, a nearside camera and frenzel lens	1
Cost of purchasing new vehicles is too high	1
If yes, what changes have you made?	Number
All new trucks have passenger side windows and all sensors and alarms & full 360 cameras	2
Awaiting classification of the star ratings before making any decisions	2
Confident that current VRU safety equipment is fit for purpose & hope that it will be recognised in the proposed scheme	1

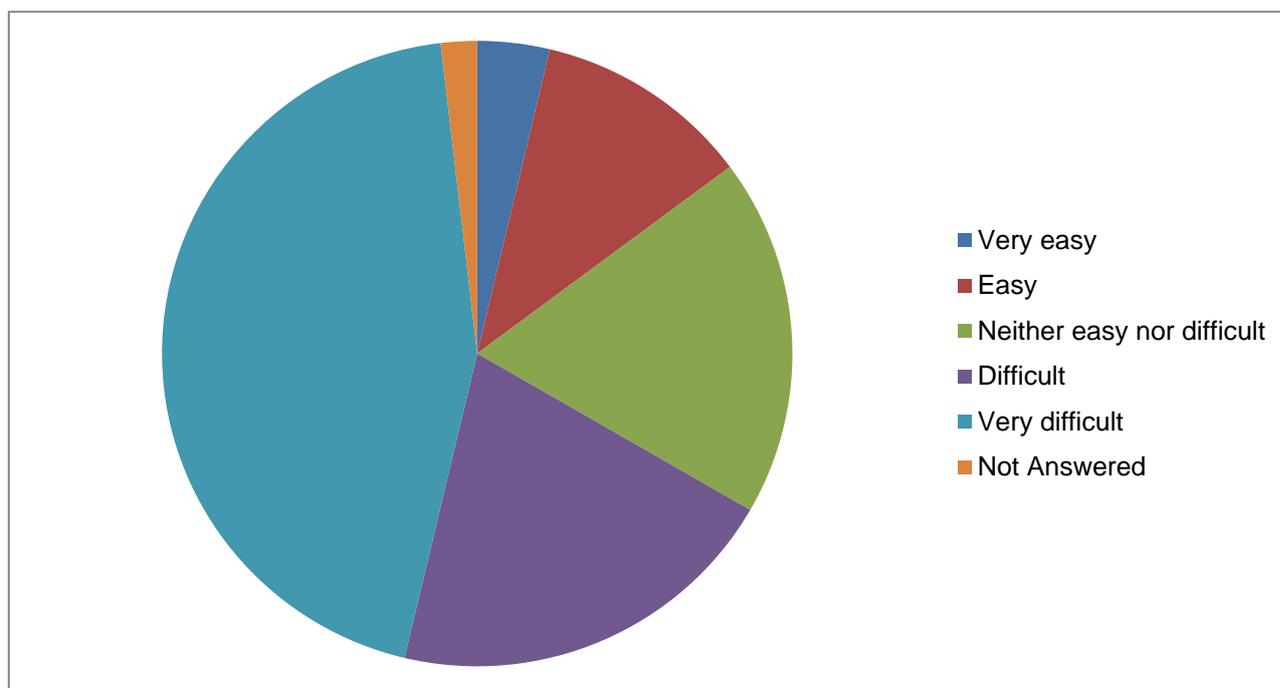
Considering lower cabs, further technology to reduce blind-spots	1
Ensuring vehicles are fitted with additional mirrors/signage/equipment	3
Fitting vehicles with N/S door lower panel glass/mirrors	2
Introducing specific vulnerable road user in house training for all of our drivers	1
It is a continuous process/in discussion with manufacturers	2
Looking at the vision area's of our current fleet, using the data from TRL	1
Purchasing Mercedes Econic & Dennis Munciple specification vehicles	1
Seeking advise from manufacturers on how their vehicles may be rated	2
Targeting mid 2017 to complete research which then will enable us to look at all OEM's and what is on offer	1
Using Econic low entry cab for a curtainside & dropside body rather than refuse body	2
Will get DVS vehicles when current lease is up	2
Working on a fleet replacement program	2
Changed to Dust cart style cabs	1
Plan to stop London deliveries, costs outweighs benefits	4
Research of new vehicle types/ low level cab heights/ FORS	1
Other comments	Number
Additional windows only effective if there is no passenger	1
Discouraging operators from trading within London	4
Lower entry cabs restricted to two-vehicle manufacturers	1

**Question 33: How easy do you think it will be for your operation to comply with the ban on zero star vehicles in 2020?**

We asked these respondents if it would be easy or difficult to comply with a DVS scheme. 12% of these respondents reported it would be difficult or very difficult to comply. Please see figure 28 below.

**Figure 28: Ease of compliance**

Option	No. of responses	% of these respondents
Very Easy	2	4%
Easy	6	11%
Neither Easy or difficult	10	19%
Difficult	11	20%
Very difficult	24	44%
Not answered	1	2%
<b>Total</b>	<b>54</b>	<b>100%</b>



We also asked respondents to provide comments about how it will be for their operation to comply with the ban on zero star vehicles in 2020, whether they will find the scheme difficult or very difficult to comply with and asked what would make it easier to do so?

**Figure 29: Comments about compliance**

General comments	Number
If N3G off-road is zero star DVS how do we access construction sites with rough ground?	1
Operators cannot have a fleet for London & one for the rest of UK/ unrealistic	1
Current system does what DVS is designed to do	1
All depends on the classification of the star ratings	2
Unsure as I cannot assess the cost impact and the complexity of the requirements	2
Suggestions?	Number
Financial help required	2
Doubt my current vehicle fleet will comply	1
Longer grace period required	3
N3G tippers are required because of the off road conditions encountered each day	1
Avoid London deliveries	2
Financially unjustifiable	1
TfL should pay for a new fleet of HGVs	1
Educating pedestrians and other road users	2
Understanding what is required	1
Account for current leases that extend beyond 2020	3
Cost of complying will put business out of operation	1

**Question 34: Do you think the proposed ban on ‘zero star’ rated HGVs will impact your business, members or operation?**

We asked these respondents if and how a DVS zero star ban would impact their business or operation. 55% of these respondents reported that they would be impacted. Please refer to Figure 30 below.

**Figure 30: Impact on business**

Option	No. of responses	% of these respondents
Yes	30	55%
No	8	15%
Unsure	15	28%
Not answered	1	2%
<b>Total</b>	<b>54</b>	<b>100%</b>

Respondents were asked to provide details of how their business or operation might be impacted. Figure 31 details the reasons provided.

**Figure 31: Details of impact on business or operation**

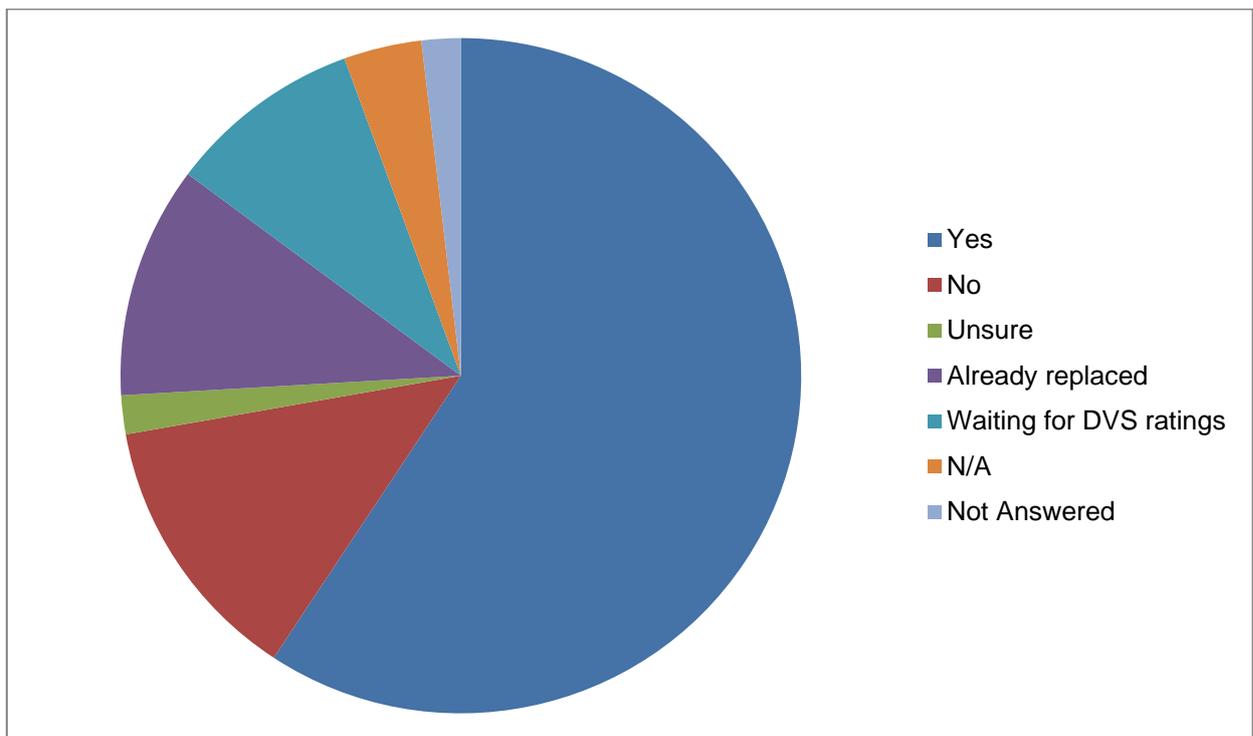
Impact	Number
Organisation has always been safety aware	1
We don't run any zero rated vehicles	1
Cost of operation rising while rates stagnate/drop	1
Financial burden of implementing changes	6
Limitations to the volume of deliveries/collections available	6
Loss of revenue	2
Not being able to trade/make deliveries to London	6
Incur additional costs	2
Shortage of crane provision for the construction industry will be made worse	1
Single vehicle operators require a vehicle for both long distance motorway operation & final delivery into urban areas	2
Unable to change fleet in time given the replacement programme timings	3

**Question 35: - Do you believe you will need to replace any of your vehicles to meet the new ULEZ Euro VI requirements?**

We asked these respondents if they thought any of their fleet would need to be replaced to meet the new ULEZ Euro VI requirements. Figure 32 details the industry's response to this question.

**Figure 32: Replacing fleet to meet Euro VI ULEZ requirements**

Option	No. of responses	% of these respondents
Yes	32	59%
No	7	13%
Unsure	1	2%
Already replaced	6	11%
Waiting for DVS ratings	5	9%
N/A	2	4%
Not answered	1	2%
<b>Total</b>	<b>54</b>	<b>100%</b>



If respondents need to place the fleet they were asked to identify what proportion of their fleet that would be required to be replaced.

**Figure 33 – Percentage of fleet renewal**

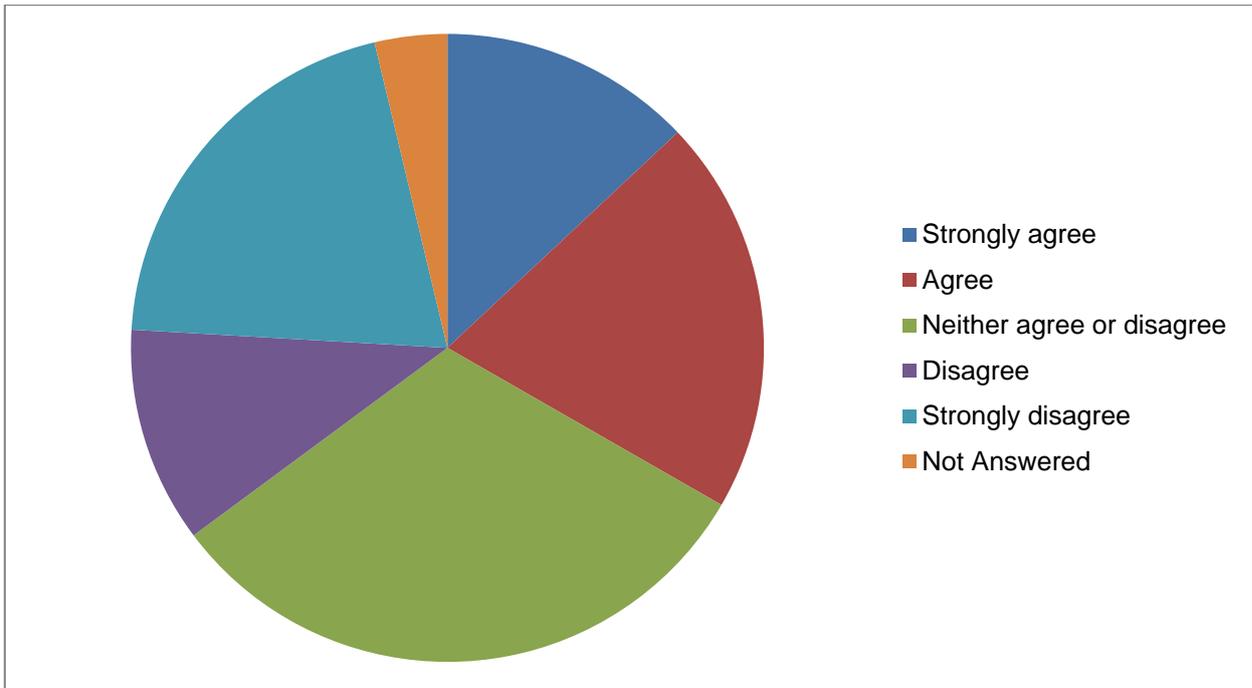
Percentage	Number of responses
100%	11
95%	1
90%	1
85%	1
75%	3
50%	3
40%	1
30	1
25%	3
20%	1
17%	1
10%	1

**Question 36: To what extent do you agree that the geographical boundary of the proposed ULEZ and DVS schemes should be the same?**

These respondents were asked if they thought that the geographical boundary for both the DVS and ULEZ schemes should be identical. Figure 34 illustrates their views on this matter.

**Figure 34: Boundary area for ULEZ and DVS**

Option	No. of responses	% of these respondents
Strongly agree	7	13%
Agree	11	20%
Neither agree or disagree	17	31%
Disagree	6	11%
Strongly Disagree	11	20%
Not answered	2	4%
<b>Total</b>	<b>54</b>	<b>100%</b>



**Question 37: Do you have any further comments on alignment of schemes affecting HGV operators in London?**

These respondents were asked if they had any additional comments on the alignment of schemes that may affect HGV operators. Three additional comments were provided. Please refer to figure 35 below.

**Figure 35: Comments about alignment of schemes**

Comments	Number
DVS ULEZ will work against each other	1
HGVs are an integral part of the UK's economy & are necessary	1
Smaller operators could be put out of business	1
Concerned that the scheme will be used as money making exercise	1
Too many competing HGV schemes for London	1
Not allow HGVs into London (M25 ring)	1
Suggestions	Number
DVS should cover wider area not just within London/M25	1
DVS should only apply within the city area not stretch to the M25	1
There should be a single scheme to cover all aspects of HGVs within a single boundary area	1
Make our cities safe and control pollution instead of penalising one industry	1

**Question 38: What further issues, not covered in the questions above, do you believe need to be considered in terms of implementing the DVS scheme and its likely impacts on you or your business?**

Respondents were asked if they thought that there were any further considerations in terms of implementing DVS. Please refer to figure 36 below for detail of comments provided.

**Figure 36: Comments about further considerations**

Comments	Number
Goods need to be delivered to meet demand of shoppers in a 24/7 society	2
Will foreign long distance trucks operating in the UK be able to comply with the DVs requirements?	2
Will there be financial assistance/incentive?	1
Smaller operators will be hardest hit	2
Would need to split the local and distance vehicles which is costly/inconvenient	1
No consideration on the likely move towards 12 tonne goods vehicles that are out of scope of the scheme	1
Suggestions	Number
Allow sufficient time for businesses to comply	2
Further work required to categorise which vehicles fall into which categories	1
Provide financial support	1
Timescales shouldn't be decided until start rating is decided	1
Timescales shouldn't be decided until start rating is decided	1

**Question 39: What sector do you operate in?**

These respondents were asked to identify which sector that they operate in. Figure 37 illustrates this. It suggests that some operator/drivers work in multiple sectors.

**Figure 37: HGV Operator/driver sectors**

Option	No. of responses	% of these respondents
Construction	33	61%
General Haulage and distribution	22	41%
Food and retail	5	9%
Agriculture	2	4%
Waste and recycling	11	20%
Utilities	2	4%

**Question 40: Where does your business operate?**

These respondents were asked to identify which areas they operate in. Figure 38 illustrates this. It suggests that some operator/drivers work in multiple areas.

**Figure 38: Areas of operation**

Option	No. of responses	% of these respondents
London only	3	6%
London and the South East	18	33%
UK wide	32	59%
UK and Europe	4	7%
Wider international	2	4%

**Question 41: What is the size of your HGV fleet in numbers?**

These respondents were asked to identify the size of their fleet. Figure 39 illustrates this.

**Figure 39: Fleet size**

Option	No. of responses	% of these respondents
1- 10	15	30%
11- 20	8	15%
21- 30	4	8%
31- 40	4	8%
41 - 50	1	2%
51 - 60	3	6%
61 – 70	1	2%
71 - 99	0	0%
100 – 199	4	8%
200 – 299	4	8%
300 - 399	1	2%
400 - 499	0	0%
500 – 599	2	4%
600 - 699	2	4%
1000+	3	6%
Not answered	2	4%
<b>Total</b>	<b>54</b>	<b>100%</b>

**Question 42: What type of vehicles do you operate**

These respondents were asked to identify what vehicle types that they operate. Please refer to figure 40 below.

**Figure 40: Vehicle types operated**

Option	No. of responses	% of these respondents
Rigid	16	30%
Articulated	7	13%
Mix	30	56%
Not answered	1	2%
<b>Total</b>	<b>54</b>	<b>100%</b>

**Question 43: What body types / trailers do you operate?**

These respondents were asked to identify the body types and trailers that they operate and were given the opportunity to select multiple options. Please refer to figure 41 below.

**Figure 41: Body types/trailers operated**

Option	No. of responses	% of these respondents
Flat bed or dropside	26	48%
Curtain-sider	17	31%
Box	14	26%
Tipper	22	41%
Skip loader	6	11%
Mixer	3	6%
Other (please specify)	7	13%

Of those that responded 'other', figure 42 illustrates the body types/trailers that they operate:

**Figure 42: Other**

Other	Number
Gritters, traffic management, crane lorries, sweepers	1
Waste – rear end loading, FEL, Front End Loading, Rolonof	1
Sweepers Tankers	1
Walking Floor	1
Walking floors/V Floor	1
Cranes	1

**Question 44: What is the average age of you HGV fleet in years?**

These respondents were asked to state the average age of their HGV fleet. Figure 43 illustrates this in years. The most common (46%) was between 4-7 average age.

**Figure 43: Average age of fleet in years**

Option	No. of responses	% of these respondents
(1-3) years	17	31%
(4-7) years	25	46%
(8-11)	4	7%
(12-15) years	2	4%
Other	2	4%
Not answered	4	7%
<b>Total</b>	<b>54</b>	<b>100%</b>

**Question 45: Average age of fleet renewal cycle in years?**

These respondents were asked to state the average term of their fleet renewal in years. Figure 44 below illustrates this in. The most common fleet renewal term is between 4 and 7 years.

**Figure 44: Average fleet renewal cycle**

Option	No. of responses	% of these respondents
(1-3) years	3	6%
(4-7) years	22	41%
(8-11)	18	33%
(12-15) years	1	2%
(16-19) years	0	0%
(20-23) years	1	2%
Other	3	6%
Not answered	6	11%
<b>Total</b>	<b>54</b>	<b>100%</b>

**Question 46: What is the ownership model of your fleet?**

We asked these respondents what the ownership model of their fleets. Figure 46 below shows that the most common approach is ownership.

**Figure 46: Ownership model of fleet**

Option	No. of responses	% of these respondents
Own	30	46%
Lease	6	11%
Contract lease	6	11%
Hire purchase	7	13%
Other	2	4%
Not answered	3	6%
<b>Total</b>	<b>54</b>	<b>100%</b>

**Question 47: On average, how frequently do your HGV(s) enter London?**

We asked these respondents how often the vehicles in their HGV fleets enter London. Figure 45 illustrates this frequency. The majority of vehicle fleets (85%) enter either daily or weekly.

**Figure 47: Frequency that HGVs enter London**

Option	No. of responses	% of these respondents
Daily or weekly	46	85%
Fortnightly or monthly	3	6%
Few times a year	2	4%
Once a year	1	2%
Less than once a year	2	4%
<b>Total</b>	<b>54</b>	<b>100%</b>

**Question 48: Roughly what percentage of your HGV mileage is covered in London?**

We asked these respondents to identify the percentage of their HVG millage which is undertaken in London. The most frequently mentioned was between 11 and 12 per cent of the fleet. Please refer to figure 48 below.

**Figure 48: Percentage of HGV mileage in London**

Option	No. of responses	% of these respondents
0-10%	9	16%
11-20%	12	22%
21-30%	7	13%
31-40%	3	6%
41-50%	8	15%
51-60%	2	4%
61-70%	1	2%
71-80%	0	0%
81%-90%	3	6%
91-100%	2	4%
Unsure/other	2	4%
Not answered	5	9%
<b>Total</b>	<b>54</b>	<b>100%</b>

### Question 49: Do you operate off-road (NG3) vehicles?

These respondents were asked if they operate off road vehicles. The majority indicated that they do not. Please refer to figure 49 below.

**Figure 49: NG3 off-road vehicles operated.**

Option	No. of responses	% of these respondents
Yes	19	35%
No	31	57%
Unknown	2	4%
Not Answered	2	4%
<b>Total</b>	<b>54</b>	<b>100%</b>

The subsequent question asked the percentage of time that NG3 vehicles spend off-road. This only applies to the respondents that answered yes to the question above. Please refer to figure 50 below.

**Figure 50: Percentage of time spent off-road**

Option	No. of responses
0-10%	7
11-20%	3
21-30%	1
31-40%	1
41-50%	1
51-60%	0
61-70%	0
71-80%	1
81%-90%	1
91-100%	2
Not answered	2
<b>Total</b>	<b>19</b>

### Question 50: Could N3 'on-road' vehicles do the same job?

These respondents were asked if N3 'on road' vehicles could do the same job. The majority of respondents felt that they couldn't or where unsure. Please refer to figure 51 below.

**Figure 51: Using N3 vehicles instead of NG3**

Option	No. of responses	% of these respondents
Yes	3	6%
No	17	31%
Unsure	21	39%
Not Answered	13	24%
<b>Total</b>	<b>54</b>	<b>100%</b>

The subsequent question asked for additional comments relating to the question above.

**Figure 52: Additional comments**

Comments	Number
Is there an N3 vehicle suitable for long distance operations with overnight bed?	1
Concern over delivery site conditions at the construction sites	3
Difficult to fulfil environmental objectives if using specific vehicles for certain jobs	1
Ground clearance / driver issues	2
Historically due to landfill operations	1
Environmental conditions in some areas require a specific type of vehicle	1
Rural sites/ rough terrain	8
Some deliveries require N3G	3
This has been the norm for on/off road operations	2

### Question 51: What do you think about the quality of this consultation?

This question was open to all respondents and asked what they thought of the quality of the consultation. Figure 53 illustrates all respondents opinions. 64% either thought the quality was very good or good.

**Figure 53: Quality of the consultation**

Option	No. of responses	% of these respondents
Very good	170	19%
Good	405	45%
Acceptable	211	24%
Poor	56	6%
Very poor	20	2%
Not answered	30	3%
<b>Total</b>	<b>892</b>	<b>100%</b>

The subsequent question asked for additional comments relating to the question above.

**Figure 42: Additional comments**

Comments	Number
An explanation of the DVS standard. Detailed Information pack / technical specification requirements	23
More information on Manufactures who are currently producing acceptable rated vehicles	1
Improving congestion on London roads will reduce pollution/accidents	4
Cause of accidents not considered: Cyclists undertaking / running red lights, pedestrians /cyclists with headphones on	1
Consultation not widely publicised	11
Information could be more simplistic and brief	8
Proposal lacks in-depth analysis	7
Questions leading/ decision made	5
Very little engagement with haulage industry	5
Proposal is unfairly targeting HGV industry. VRUs need to take accountability	4
Data on deaths and injuries should be more prominent in the explanation	2
Missing info: Geographical area in which this will be in force / no indication of the scoring system to the ratings	2

No strong justification for the proposed changes/ not fit for purpose	2
There should have been a question on timeframes	2
Consultation fails to take into account the enormous problems of retrofitting new equipment	2
Difficult for non-industry people to understand	2
Insufficient headings/ bullet points/ Illustrations	1
Proposals biased towards manufacturers	1
Skip logic sequence confusing	1
The correct terminology is LGV not HGV	1
There should be more than one option proposed so respondents can decide which is most effective	1
Truck driver safety not addressed	1
Q5 could have been better phrased	1
The analysis of RTCs are misleading	1
The issue of non-UK vehicles is ignored in this survey	1
The pictures highlighting the 5 star rated vehicle is flawed	1

## Analysis of responses to open question

As outlined in the methodology, each of the comments in the open questions (9 and 14) was coded according to key themes. One response could be coded under several comments, i.e. if the respondent makes more than one point in their response.

### All respondents

The number of comments left under each theme is shown in figure 43. It shows that the most common type of comments referred to requests the DVS to be implemented sooner, stating that DVS will be safer for all road users and that the proposed timescales for DVS are not ambitious enough.

### Figure 43: Question 9. Do you have any other comments about our current plans to use the DVS to improve HGV safety?

Implementation	Number
Implement changes earlier than 2024	41
Proposed changes will be safer for all road users	35
Timelines not ambitious enough	33
Generally supportive	33

Independent monitoring and success validation of scheme	27
Proposed changes will be safer for cyclists	22
Only allow HGVs with good/ direct visibility or three star rating into London	18
Implementation of DVS will not necessarily improve safety	16
Improved driver visibility	16
Support introduction of direct vision vehicles	16
Adopt a 5 star rating	15
Proposals not robust enough	14
Adopt a higher star rating	13
Allow a transition period to give companies time to comply	9
Encourage manufacturers to make all vehicles with 5 star rating	8
This scheme should be nationwide	8
Provide help for small to medium sized business' to comply with standards	7
<b>Impacts and considerations</b>	
Waiting for stock to rotate to avoid costs to HGV compromises safety	10
Concerned that manufacturers will struggle to meet demand/ hike up prices	7
Low cab vehicles not suitable/ unsafe for some environs	7
<b>Safety</b>	
HGVs get the blame even the cyclist/ pedestrian is on the wrong	28
<b>Alternatives</b>	
Promote use of driver aids e.g. proximity sensors/audible turn signals	15
<b>Financial</b>	
Smaller operators unable to comply will be forced out of business	14
<b>Other</b>	
Cyclist: Introduce mandatory testing/licencing/registration/insurance	37
Cyclists should be responsible for their own safety/be held accountable	29
Intensive training for drivers/cyclists	20
Raising vulnerable road user self- awareness	18
Ban HGVs on main cycling routes during peak hours	14
Introduce a penalty for cyclists who disregard the Highway Code	12

Cyclist/driver behaviour	12
Support DVS with training for vulnerable road users	11
There should be time restrictions on HGV movements to avoid rush hours / school runs	9

### Targeted group

Question 14 was only answered by a targeted group of respondents including members of the public, government organisations, Community/voluntary groups, businesses and other. The number of comments left under each theme is shown in figure 44. It shows that the most common type of comments referred to the rating body for DVS being independent of manufacturers and operations and that DVS should be implemented as soon as possible.

**Figure 44: Question 14. Please provide any further comments on the more detailed principles and/or technical aspects of the DVS as developed to date.**

Implementation	Number
Rating body should be independent of HGV manufacturers & operators for impartiality	29
Implement changes as soon as possible	26
Only allow 5 star rated HGVs into London	9
TFL need to manage it not operators or manufacturers	8
The DVS rating could be displayed on the vehicles/ trailers	8
Give the manufactures more time to design the larger trucks before bringing in the proposed 2020 ban	3
HGVs need clear doors & windows like buses for better visibility	3
Vulnerable groups (pedestrians and cyclists) should be represented when developing the standard	3
Lower Cabs will struggle to navigate uneven terrain	3
Vulnerable groups (pedestrians and cyclists) should be represented when developing the standard	3
<b>Financial</b>	
More cost to the haulier for what in reality will be negligible benefit	7
The customer will end up paying for the additional costs as operators will be forced to hike up their prices	4
<b>Other</b>	
Segregated cycle lanes & pedestrian crossings	16
Ban HGVs in London	3

Construction industry should also change their working practices	3
A small glass panel in the bottom of the cab door isn't that useful	3

### 3 Responses from stakeholders

#### Local Authorities

##### City of London Corporation

Supports the principle of introducing a DVS and agrees that zero rated vehicles should be banned from 2020, and below three star rating from 2024. Also agrees that DVS ratings should be displayed on vehicles.

States that they are a FORS Gold and CLOCS Champion rated organisation and these links provide a practical route in which to support DVS.

##### London Borough of Camden

LB Camden strongly supports TfL’s ambition to further improve commercial vehicle safety via the introduction of the world’s first DVS, given the disproportionate risk that these vehicles continue to pose to vulnerable road users. Supports a holistic approach to improving direct vision rather than mandating one specific vision aids for drivers in the form of additional glass panels in passenger doors.

Agrees that the star ratings should be displayed on vehicles for ease of enforcement and increased visibility and supports a complete ban 24 hours a day, 7 days per week of those vehicles not meeting the required DVS rating to help achieve the most significant road safety benefit.

Suggests that DVS should cover the LEZ and given the number of KSI in London advocates applying the DVS to all Large Vehicles over 3.5 tonnes gross vehicle weight.

LB Camden stated that the TRL assessment and identified DVS protocol seems robust, the limitations of the study indicate further research would be appropriate before a London-wide policy is implemented.

Suggests that the impact on industry should be considered given how critical delivery and servicing is to London’s economy and that TfL could look to support industry to make this transition by engaging early with fleet operators.

##### London Borough of Croydon

Supports the principle of introducing a DVS and agrees that zero rated vehicles should be banned from 2020, and below three star rating from 2024. Also agrees that DVS ratings should be displayed on vehicles.

##### London Borough of Ealing

Supports the principle of introducing a DVS and agrees that zero rated vehicles should be banned from 2020, and below three star rating from 2024. Also agrees that DVS ratings

should be displayed on vehicles. Suggests that TfL also give consideration to the use of warning systems as an interim measure to make older HGVs safer.

### **London Borough of Enfield**

Supports the principle of introducing a DVS and agrees that zero rated vehicles should be banned from 2020, and below three star rating from 2024. Also agrees that DVS ratings should be displayed on vehicles. Although raised concerns that the police would not have the resource to enforce a ban.

### **London Borough of Hackney**

LB Hackney agrees that adopting a DVS will improve safety for vulnerable road users and supports TfL, Crossrail and other bodies to make lorries safer through procurement processes. Supports a phased introduction of DVS, with banning zero rated first and agrees that the DVS star rating should be displayed on vehicles.

Hackney queried whether mirrors and cameras that are required under the Safer Lorries and Freight Operator Recognition schemes will remain in place when DVS is introduced. They also queried whether financial assistance would be available to the Council to replace non-compliant vehicles and noted that there currently there are a limited range of compliant vehicles in the market.

They welcomed the involvement of operators and manufacturers in the development of the DVS star ratings but suggested that TfL should take responsibility for producing the star rating in the first instance.

### **London Borough of Havering**

LB Havering supports initiatives to improve road safety and believes that increasing the safety of HGVs in the city supports this initiative. However suggested that the rating system needs to be defined as soon as possible to help businesses, particularly small businesses, plan effectively.

LB Havering also suggested that TfL should consider how local authorities and other public bodies should update their fleets to be compliant whilst finances are being constrained.

Lastly noted that DVS should be introduced alongside other measures to improve safety for vulnerable road users such as Borough Cycling Schemes.

### **London Borough of Hounslow**

LB Hounslow welcomes the proposal for a new rating system that will work towards ensuring heavy goods vehicle drivers are better able to see vulnerable road users.

Suggests that TfL needs to work closely with haulage and construction companies in order to deliver to ban zero rated vehicles in 2020 and 1 and 2 star in 2024.

### **London Borough of Islington**

Supports the principle of introducing a DVS and agrees that zero rated vehicles should be banned from 2020, and below three star rating from 2024. Also agrees that DVS ratings should be displayed on vehicles.

## **London Borough of Merton**

LB Merton recognises the positive benefits adopting a star rating classification system might bring and supports the proposals and implementation timeframe as set out in the consultation. Suggests that it will help address road safety issues for vulnerable road users.

Merton also encourages TfL to continue working on discouraging the most unsuitable HGVs, such as those with off-street capabilities from using London's streets.

## **London Borough of Newham**

LB Newham supports the principle of reducing the risk to vulnerable road users through the introduction of the DVS. The proposal for implementation of the standard by 2024, for the vehicles directly operated by the council is felt to be an achievable target.

## **London Borough of Redbridge**

LB Redbridge agrees that adopting a DVS has the potential to improve HGV and vulnerable road user safety, but suggest that the displaying of the star rating on vehicles should be voluntary. Suggests that good operators will want to demonstrate compliance.

## **London Boroughs of Wandsworth and Richmond**

LB's of Wandsworth and Richmond stated that that DVS will not improve HGV safety as they believe that human error is the biggest factor in causing collisions. Suggests that TfL should be pursuing vehicle detection technology which was felt to be more effective.

## **London Borough of Westminster**

Supports the principle of introducing a DVS and agrees that zero rated vehicles should be banned from 2020, and below three star rating from 2024. Also agrees that DVS ratings should be displayed on vehicles.

## **Royal Borough of Greenwich**

Agrees that a DVS will improve road safety, but requested that TfL provides further clarification in the following areas:

- Costs to small and medium sized businesses to ensure compliance
- The average HGV would have a lifespan of 7-9 years therefore this could have a major effect to independent companies within the timeframes that are proposed
- There may also be the case that some businesses may only use vehicles that are compliant in London while still using older fleet vehicles out of the London control areas

## **Royal Borough of Kensington and Chelsea**

RB Kensington & Chelsea says that measures already adopted in the borough have gone some way to reduce collisions, but recognises that there is much more to do.

Suggests that DVS and ULES should be better aligned and that all new lorries registered after 2019 should meet at least the 1 star rating in readiness for 2020 and all lorries registered after 2022 should be 3 star or above in readiness for 2024.

Supports a criminally enforceable ban for non-compliant vehicles as opposed to a charge.

## **Other Government Organisations**

### **London Councils**

London Councils agrees that the DVS has the potential to improve HGV and vulnerable user safety and the banning of zero rated vehicles from 2020 and 2 star and below from 2024. Does not totally agree with the DVS star rating being displayed on the vehicle as this will have cost implications, but acknowledge that it could help assist with raising awareness and enforcement.

They recommend that that the DVS be consolidated with other schemes and standards such as Construction Logistics and Community Safety, Fleet Operator Recognition Scheme, Safer Lorry Scheme and potentially the London Lorry Control Scheme. Also recommend that TfL lead with developing the DVS in conjunction with HGV operators and manufacturers.

## **Elected Representatives**

### **Caroline Pidgeon AM**

Caroline Pidgeon Councils that the DVS has the potential to improve HGV and vulnerable user safety and the banning of zero rated vehicles from 2020 and 2 star and below from 2024.

Suggests that DVS is introduced as soon as possible and that the development of the standard should be led by TfL in conjunction with research partners.

## **Businesses**

### **CEMEX**

Believes that a DVS standard should be implemented within an achievable timescale and that clarity of the star rating system will help businesses in forward purchasing planning. They suggest that there is a role for retrofitting and indirect vision aids as part of reducing the risks for vulnerable road users.

Suggests that retrofitting measures such as a low level passenger window or fitting some indirect measures might enable such N3G chassis vehicles to be above a zero rating.

Suggests that to achieve three 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. CEMEX does not support a lower chassis being a three star ratings requirement.

Requests that DVS plans are coordinated with air quality proposals.

## **DHL**

DHL agrees that the safety of cyclists and pedestrians is a priority and supports the DVS in principle. However, outlined a number of concerns including:

- Clarity on the star rating is required to enable businesses to plan effectively for the future
- Suggests that businesses may already be impacted if they have already ordered vehicles for 2020 or 2014
- Does not believe that DVS is the most appropriate way to achieve vision zero as it does not take into account driver training or future technological developments
- Suggests that a European approach is required rather than a London specific one
- DHL supports a single standard for good practice and is concerned that the DVS may add further fragmentation if it is encouraged as a separate requirement in public and private sector procurement
- DHL believes that incentives for good practice rather than penalties for non-compliance would be a preferable approach

## **John Lewis Partnership**

The John Lewis Partnership fully supports the need for high levels of safety and protection for vulnerable road users in and around London. However, requests that DVS plans are coordinated with air quality proposals so that business are able to understand how to comply for all TfL initiatives.

Suggests that other measures such as cameras and driver training should be considered as part of the overall range of measures and solutions to achieve the required star rating as part of the DVS, and not disregarded.

Also suggests that DVS should be a national scheme and that smaller vehicles should not be in scope i.e. those not exceeding 18 tonnes.

Expresses concern that the DVS scheme will be applied to all roads, including those that are used lightly or not at all by cyclists and stated that greater clarity about how the scheme will be enforced needs to be provided.

Comments that this phase of consultation was undertaken without the required level of research and analysis to adequately inform stakeholders.

## **Lidl**

Lidl stated that the rating system is not clear at present as asks for further clarity. Suggests that DVS would have a major financial impact on their business as an HGV has a lifecycle of 5-8 years.

## **Mace**

Supports the principle of introducing a DVS and agrees that zero rated vehicles should be banned from 2020, and below three star rating from 2024. Also agrees that DVS ratings should be displayed on vehicles.

However, suggests that the implications of increased costs, brought about by buying new, compliant vehicles or from upgrading older vehicles to comply, needs to be given consideration as supply chains will look to pass these on.

States that DVS does not take into account the voluntary action that industry has already taken to improve fleets such as installing safety devices. Requested evidence to support that DVS will reduce collisions.

## **Tarmac**

Suggests that whilst DVS would deliver some benefits, some recognition should be given to the strong leadership that the industry has already demonstrated. Suggests that a coordinated approach is required moving forward and that DVS would be challenging to deliver within the proposed timescales.

Suggests that other factors need to be taken into consideration such as pedestrian education to reduce KSI's and other existing improvements to lorry cabs such as cameras.

States that the proposed implementation timescales for DVS and removal of some vehicles would pose a problem in the supply to construction projects. SME's would particularly find it difficult financially to replace all non-complaint vehicles. Suggests that a longer period of time is allowed for the natural renewal of fleets.

Does not see the benefit of displaying star rating on vehicles.

## **Thames Tideway**

States that the safety of cyclists and other vulnerable road users is a key priority for Tideway and they are fully supportive of proposals to further improve vehicle standards to reduce the risk of incidents. States that addressing a driver's blind spot is the correct approach rather than favouring a particular indirect visual aid.

A DVS standard will benefit the construction sector, but states that further work is required on the supply chain to fully utilise the high rating vehicle types across all types of sites.

## **Travis Perkins Group**

Travis Perkins Group suggested that the clarification of the star rating system and implementation of the DVS should be based on manufacturers should be based developments in respect of road safety. Suggested that N3 & N3G with the appropriate visibility aids should meet the required minimum 3 star rating in the initial period to allow operators to move towards compliance as part of their fleet replacement program

## **UPS**

UPS suggests that TfL should also consider the retrofitting of HGVs as part of DVS with additional visual aids such as reversing cameras, to help improve the driver's visibility and warning systems to protect vulnerable road users. Also suggests that the proposed timeframe of DVS will not allow enough time for the development of alternative vehicle designs and so retrofitting will be essential.

Suggests a national scheme would be favoured as opposed to a London-wide one.

## **Manufacturers**

### **DAF Trucks Ltd**

Supports measures that can improve safety for pedestrians and cyclists but has some concerns about DVS. States that DVS does improve visibility in some areas it should not be considered alone. Cameras, sensors and mirrors also aid visibility and DVS does not take into account investment already made into this technology.

Believes the implementation timescales are too short and that there is not enough time for the industry to develop alternative cab designs which is going to be costly for fleet operators due to limited supply and higher production costs.

Suggests that DVS would compromise other safety and operational performance i.e. a lower mounted driving position can reduce long distance forward visibility and ability to anticipate in high speed driving situations.

Suggests that a local London DVS will not necessarily lead to vehicle or cab redesign and that better approach would be to work towards European or global standards to encourage manufacturers to develop dedicated urban vehicle design.

States that the proposed DVS will be complex to understand manage and administer. The star rating system is based on a complex assessment process which varies by cab type and a multitude of specification variables.

### **Damlier**

Strongly supports adoption of DVS and proposed timescales and suggests that mirrors and technical safety assist systems can support DVS but cannot compensate.

### **General Motors**

General Motors states that by referring to the vehicles to which the DVS applies as HGV's, does not provide enough certainty to their dealers and customers who sell/operate vans in London. Suggests that there should be a clear distinction between the different types of HGV's the proposed standard applies to for the avoidance of any doubt.

### **Iveco Ltd**

Requested clarification on a number of areas including how DVS would be enforced and how vehicles will be measured.

DVS would need to consider impact on traffic and air quality.

### **Mercedes-Benz Trucks UK Ltd**

Requests that the start rating system is clarified so that the impacts can be fully understood, particularly the types of vehicles that are in and out of scope of DVS. Also requests that the geographical area that the DVS will be applied to and how it will be enforced is confirmed.

Suggests that vehicles over 7.5 tonnes and public service vehicles should be considered.

### **Scania (GB) Ltd**

Scania raised concerns about the cost that DVS would have on manufacturers and operators, and that the proposed implementation timescales are insufficient.

Suggests that other wider legislation is also considered i.e. EU/UN ECE.

### **Volvo Group**

Requests that the start rating system is clarified so that the impact on vehicle operators can be understood. Suggests that a EU wide approach is adopted rather than London-centric one and that the DVS should work alongside other safety features such as cameras and driver assistance systems

Suggests that DVS does not at the same time lead to poor safety development in other areas (e.g. a 'low-entry' type cab may offer poorer occupant protection than another design, and compromises may impact other areas of vehicle operation, such as when the vehicle is used on higher speed urban arteries).

Suggests that the removal of larger sized vehicles on roads would result in a requirement to operate a larger number of smaller vehicles which might not result in a net improvement of road safety.

## **Trade bodies**

### **Association of International Courier and Express Services**

AICES agrees that improving the safety of pedestrians and cyclists is a key priority. However, does not think the DVS proposals are the most effective way of achieving the Mayor's 'vision zero' goal.

Suggests that TfL should work with the UK government to agree on a national approach for consistency across the country and stated that the star rating system needs to be clarified.

AICES further suggests that TfL should also consider the retrofitting of HGVs with additional visual aids to help improve the driver's visibility and warning systems to protect vulnerable road users. Believes that there should be regulatory incentives for those adhering to industry agreed standards for cleaner, quieter and safer deliveries in London. This approach would ensure that both vehicle specification and training are taken into consideration as well as other policy priorities for example around air quality.

## **BVRLA**

Does not agree that the DVS will improve HGV and road user safety does not agree with the proposed implementation timescales. Suggests that there is not enough evidence that DVS will deliver improvements in road safety and the organisations have already invested in other technology such as cameras and cyclist detection systems.

Suggests that a National framework would be more preferable to a London-wide one.

## **Chartered Institute of Logistics and Transport**

Raised concerns that TfL is setting vehicle standards for London in isolation. Suggests that design specifications (and any other 'standards') should be taken at the relevant national or international level. Camera systems designed to enhance visibility should be included when considering DVS improvements.

Stated that any improvement in vision for a driver is a positive move in preventing injury to vulnerable road users, but that DVS is limited as it doesn't include all vehicles such as buses. Suggested the DVS could be effective in improving road safety, timelines may not be practicable to implement and would put off companies investing in new vehicles. Also suggested that the numbers of compliant vehicles needed to replace zero rated ones in 2020 would not be available which would have a negative impact on construction projects in the Capital.

Does not believe that there is any benefit to displaying star ratings on vehicles.

Suggests that DVS star ratings need to be seamlessly integrated into the existing safety related schemes (e.g. FORS & CLOCS) and we suggest moved towards a registration database at individual vehicle level that allows monitoring by both ANPR systems (for TfL) and at a site gate level (for Contractors and schemes).

## **European Rescue and Recovery Initiative**

Agrees that the introduction of DVS would have the potential to improve road safety and that zero rated vehicles should be banned from London's streets from 2020. Does not agree that only 3 star rated vehicles or above should be allowed to operate from 2024.

## **Freight Transport Association**

Supports the Mayor's vision 'zero' vision' approach to road danger. Suggests that legislation should be set at a National level and should be integrated with other initiatives such as ULEZ.

Suggests that DVS should be considered alongside other technological advancements including cameras and sensors. Many operators have already made financial investments in this type of technology.

Suggests that DVS should not apply to smaller vehicles i.e. those that are under 18 tonnes or specialist vehicles that are not on the roads very often. Requests further information about how DVS might be enforced and seeks assurance that all non-compliant vehicles will be held to account.

FTA suggests that some routes that are not heavily used by pedestrians and cyclists that lead to industrial areas should be exempt from DVS.

States that with the star rating not being available until later in 2017, that the full impacts on industry remain unclear. This would not provide enough time for companies to renew their fleets for 2020. Also raises concerns about resale value of second hand 'non-complaint' vehicles.

### **Mineral Products Association**

Suggests that the DVS does not take into account all the work that HGV operators have made to improve visibility.

Does not support the banning of N3G lorries as they believe that these types of vehicles will still be required to serve specific sites in London such as landfill areas.

States that banning zero rated vehicles would have an adversely negative impact on SME's.

### **Road Haulage Association**

Suggests that the DVS plans are not thoroughly thought through and that they ignore other alternatives/options that also have the potential to improve driver vision and could be delivered at a lower cost. Suggests that the costs to operators and consumers have not been considered as part of current proposals.

### **SMMT**

Believes that DVS has the potential to improve road safety but suggests that it should be based on a full impact assessment.

Suggests a transitional introduction of DVS to consider the manufacture of new vehicles and the replacement programme for new fleets.

Suggests that there are some vehicles that should be exempt from DVS and that a National standard should be applied. Requires further information on how DVS would be enforced.

### **Unite the Union**

Unite the Union does not support the proposals. Suggests that the responsibility must lay with the operator and not the driver.

Suggests that cyclists must do more to ensure their safety for example, not run red lights.

States that they changes will be felt all over the Country as lorries will form part of national fleets and requests that drivers privacy is considered as they sometimes spend long periods in cabs sleeping.

## **Transport related interest groups and charities**

### **Alliance of British Drivers**

Does not support the banning of zero rated vehicles from 2020 and 2 star and below from 2024.

Suggest that legislation should be nationwide rather than just focused in London.

### **Action on Lorry Danger**

Action on Lorry Danger strongly agrees that the DVS has the potential to improve HGV and vulnerable user safety and the banning of zero rated vehicles from 2020 and 2 star and below from 2024.

Suggests that the banning of zero rated lorries should happen urgently and that the knowledge of deaths and injuries inflicted on pedestrians and cyclists deters people from cycling and walking. This is in conflict with the Mayor's transport policies to increase use of these modes.

### **Campaign for Better Transport**

Campaign for Better Transport supports the measures outlined in the DVS consultation. Supports measures to improve lorry design in order to reduce fatalities involving HGVs. Suggests that a safer environment will encourage more people to cycle which will reduce pressure on public transport and the roads as well as reducing air pollution, greenhouse gases and congestion.

### **Campaign for Better Transport – London Group**

Campaign for Better Transport strongly agrees that the DVS has the potential to improve HGV and vulnerable user safety and the banning of zero rated vehicles from 2020 and 2 star and below from 2024. They state that cameras and mirrors do afford some safety improvements, but direct vision is more important.

### **Croydon Cycling Campaign**

Croydon Cycling Campaign agrees that the DVS has the potential to improve HGV and vulnerable user safety and the banning of zero rated vehicles from 2020 and 2 star and below from 2024.

Agrees that the DVS star rating should be displayed on vehicles.

### **Cycling UK**

Agrees that improved direct vision for lorry drivers results in improved reaction times compared to indirect vision methods such as cameras and sensors and therefore support the introduction of DVS.

Supports the proposal to ban zero rated HGVs from 2020, and 1-2 stars from 2024 and suggests that this is a reasonable timescale for the industry to plan their operations/update fleets. Suggests that 5 star rated vehicles should become the norm from 2024 and suggests that industry and planning authorities should work together to make this happen.

Agrees that star ratings should be displayed on vehicles.

### **Essex Historic Military Vehicles Association**

Agrees with the aims to make London safer, however want to ensure this does not ban the use of historic military vehicles from entering London when attending ceremonial events or poppy day collecting events.

### **Hackney Living Streets**

Hackney Living Streets strongly agrees that the DVS has the potential to improve HGV and vulnerable user safety and the banning of zero rated vehicles from 2020 and 2 star and below from 2024.

Suggests that more ambitious target of 5 star vehicles only should be adopted from 2024.

### **Living Streets**

Living Streets strongly agrees that the DVS has the potential to improve HGV and vulnerable user safety and the banning of zero rated vehicles from 2020 and 2 star and below from 2024.

States that reducing fear on the streets is an essential element in encouraging more use of walking as a means of transport in London and as a form of physical activity. These considerations therefore support three different strands of the Mayor's Healthy Streets agenda, namely modal shift, improved health and better air quality.

### **London Cycling Campaign**

Supports the Mayor's 'Vision Zero' approach and welcomes plans to reduce road danger from HGVs in addition to both training programmes and improved infrastructure.

Welcomes DVS to enable vehicle buyers, operators, contractors and their clients to know how severe the blind spots are, or how good the direct vision is, from all HGVs to improve road safety. Noted that TfL surveys found that lorry drivers, cyclists and pedestrians all identified that a key element of road danger reduction was direct eye contact.

Strongly supports the introduction of DVS and the banning of zero rated vehicles from 2020 and 2 star and below from 2024.

They welcome the Mayor's proposal to use GLA procurement power to influence road safety in London and requests that the Mayor encourages other organisations to do the same. They believe that TfL in conjunction with its research partners should be responsible for producing the DVS ratings for HGVs, with each vehicle assessed independently by a recognised testing authority.

## **LondonTravelWatch**

London TravelWatch agrees that the DVS has the potential to improve HGV and vulnerable user safety and the banning of zero rated vehicles from 2020 and 2 star and below from 2024. Is hopeful that DVS will generate a fewer number of collisions in the future.

Suggests that an independent body monitors the DVS as it is scheme that is likely to be seen as a benchmark outside of London.

## **Motorcycle Industry Association**

Motorcycle Industry Association agrees that the DVS has the potential to improve HGV and vulnerable user safety and the banning of zero rated vehicles from 2020 and 2 star and below from 2024.

## **Parliamentary Advisory Council for Transport Safety**

Parliamentary Advisory Council for Transport Safety strongly agrees that the DVS has the potential to improve HGV and vulnerable user safety and the banning of zero rated vehicles from 2020 and 2 star and below from 2024. States that it is not acceptable to have HGVs with such limited visibility operating on London's roads.

## **Road Danger Reduction Forum**

Road Danger Reduction Forum agrees that the DVS has the potential to improve HGV and vulnerable user safety and the banning of zero rated vehicles from 2020 and 2 star and below from 2024.

Also states that the DVS is only one element of HGV safety. Need to reduce the distance between HGV body and road surface and consideration of other ways to move freight I.e., rail and water.

## **Roadpeace**

Believes that DVS has the potential to minimise the risk posed to vulnerable road users by HGVs. Suggests that banning the most dangerous lorries from London's streets should happen as soon as possible. Suggests that there should be a more ambitious target for DVS and that only 5 star vehicles should be allowed to operate on London's roads from 2024.

Roadpeace endorses the display of star rating on vehicles and requests that future reporting of collisions also includes the star rating of HGVs.

## **Royal Society for the Prevention of Accidents**

RoSPA agrees that more needs to be done to improve the direct view of drivers, in addition to their indirect view through mirrors, cameras and sensors. They believe that the DVS will be an important and effective way of improving HGV and vulnerable road user safety.

Agrees with the principle of banning zero rated vehicles from 2020, but requests further information about the number of affected vehicles and the cost implications of replacing these with compliant vehicles. Suggests that the timetable of 2024 (3+ star rated vehicles only) allows a period of around seven years which provides considerable notice to manufacturers and industry.

Suggests that displaying the DVS rating on vehicles is likely to make monitoring and enforcement easier, promote the DVS and help to motivate all HGV operators to demonstrate that they support and adopt the Standard.

Agrees that TfL should lead and develop the DVS standard.

### **Southwark Cyclists**

States that HGVs have directly caused many cyclists to be killed and injured on London's streets. In addition they make people weary of walking and cycling in London which is not in keeping with the Mayor's Healthy Streets agenda.

### **Wheels for Wellbeing**

Wheels for Wellbeing agrees that the DVS has the potential to improve HGV and vulnerable user safety and the banning of zero rated vehicles from 2020 and 2 star and below from 2024. This would particularly benefit disabled cyclists as they are at a greater risk of not being seen properly by HGV drivers

### **Business Improvement Districts**

#### **Victoria BID**

Victoria BID agrees that the DVS has the potential to improve HGV and vulnerable user safety and the banning of zero rated vehicles from 2020 and 2 star and below from 2024. However requests that the timescales are brought forward and that the most dangerous lorries are removed from London sooner rather than later.

## **7 Next steps**

We have developed a rating system for 0 – 5 starts as part of the DVS which can be viewed here (insert hyperlink). These are interim ratings which are the subject of further consultation as part our proposals to introduce a phased HGV Safety Standard Permit Scheme. You can read more about these DVS proposals have your say about these here (insert hyperlink).

## Appendix A – List of stakeholders consulted

<b>Elected Members</b>	
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
Gavin Barwell 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
Jane Ellison 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
James Berry 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
Victoria Borwick MP	Kensington
Nick Hurd MP	Ruislip, Northwood and Pinner
Joan Ryan MP	Enfield North
Jim Fitzpatrick MP	Poplar and Limehouse
Boris Johnson MP	Uxbridge and South Ruislip
Catherine West MP	Hornsey and Wood Green
Kate Osanmor	Edmonton
Gareth Bacon AM	Bexley and Bromley
Jennette Arnold AM	Hackney, Islington and Waltham Forest
Len Duvall AM	Greenwich and Lewisham
Navin Shah AM	Brent and Harrow
Nicky Gavron AM	Londonwide
Tony Arbour AM	Hounslow, Kingston upon Thames and Richmond upon Thames
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
Kemi Badenoch AM	Londonwide
Sian Berry AM	Londonwide
Leonie Cooper AM	Merton and Wandsworth
Unmesh Desai AM	Barking and Dagenham, City of London, Newham, Tower Hamlets
Tony Devenish AM	Hammersmith and Fulham, Kensington and Chelsea, City of Westminster
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

<b>Police and Health Authorities</b>
Metropolitan Police
London Fire and Emergency Authority
London Fire Brigade

<b>Transport Groups</b>
Action on Lorry Danger
Association of British Drivers
British Cycling
Institute of Advanced Motorists
See Me Save Me
FreightBestPractice
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

Licenced Taxi Drivers Association
Office of Rail Regulation
Transport for Greater Manchester

<b>Trade Associations</b>
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

<b>Vehicle Manufacturers</b>
Daimler AG
Mercedes-Benz UK Ltd
Volvo
RosRoca
Dennis Eagle
Scania
MAN Truck and Bus
DAF Trucks
Iveco Ltd
Renault Trucks

<b>Construction and operators</b>
Balfour Beatty
Carillion
Interserve
Kier Group
Morgan Sindall
Amey UK
Gallafor Try
Laing O'Rourke
Keller
Bam
Lsg
Skanska
Willmott Dixon
Mace
Costain
Sir Robert McAlpine
Wates
Vinci UK
J Murphy
Lakeside 1

<b>CLOCS Operator or contractor</b>
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

<b>Business Groups</b>
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

## **Other Stakeholders**

Greater London Forum for the Elderly

Suzy Lamplugh Trust

The British Dyslexia Association

Asian Peoples Disabilities Alliance

Mind

Sense

Age London

Age Concern

Muscular Dystrophy Campaign

SCOPE

Sixty Plus

Action on Hearing Loss

Association of Disabled Professionals

Disability Allowance

Council for Disabled Children

National Childrens Bureau

RNIB

Guide Dogs for the Blind

Whizz-kidz

National Autistic Society

Stroke Association

Construction Youth Trust

National Grid

EDF Energy

Thames Water

Royal Mail

Virgin Atlantic Airways

Heathrow Airport Holding Ltd

Airport Operators Association

Brent Cross Shopping Centre

Westfield Management Company UK Ltd

The Royal Parks

Historic Royal Palaces Enterprises

British Telecom

Institute of Civil Engineers

Royal Institution of Highways & Transportation

Campaign for Clean Air in London

Society for London Theatre

Merlin Entertainments Group

Morris Visitor Publications

Planning Futures

House of Commons

Visit Britain

## Appendix B – Stakeholder email

Dear Stakeholder

### **Direct Vision Standard Phase 1 Consultation**

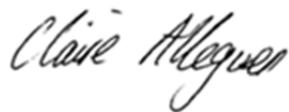
We are consulting on proposals to implement a Direct Vision Standard for Heavy Goods Vehicles (HGVs) to further improve the safety of London's roads.

On 30 September 2016, the Mayor of London, Sadiq Khan launched the first Direct Vision Standard (DVS) for HGVs. The DVS uses a zero to five 'star rating' system to rate HGVs based on how much a driver can see directly from the cab without using cameras or mirrors. Under the proposal, the most dangerous 'zero star rated' HGVs would be banned or restricted from London's roads by 2020, and only HGVs rated three stars and above would be allowed from 2024.

To view further information about these proposals and to provide your feedback, please visit our consultation portal.

Please note the consultation closes on 18 April 2017.

Yours sincerely



Claire Alleguen  
**Consultation Team**  
**Transport for London**