Further improving lorry safety in London
Consultation report
September 2016
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Executive summary

Between 22 January and 4 March 2016, we consulted on proposals to further improve the safety of lorries in London and reduce the danger they can pose to other road users. This document summarises the results of the consultation.

About the proposals

The consultation asked for views on the principle of requiring lorries operating in London to be fitted with vision panels in passenger side doors wherever possible. We suggested two options for implementing such a requirement:

Option A - Differential road charging to encourage higher vision lorries – changing the central London Congestion Charge zone or the London-wide Low Emission Zone (LEZ) schemes so that a substantially higher charge is applied to lorries without the vision panels fitted to the passenger door, unless the panels are not capable of being fitted. Any modification to the charging schemes would be the subject of further consultation and would need to be approved by the Mayor.

Option B - Restricting non-compliant vehicles – seeking to place restrictions on lorries without passenger door vision panels, unless it’s not possible to fit them. This could be a total ban, operating 24/7; a specific time restriction, so that they can only operate at particular times of the day; or a route restriction, so that the whole or majority of their journey takes place on defined 'safer routes' (for example where cyclists are physically segregated from other road traffic). Non-compliant vehicles breaking these restrictions would be subject to a fine.

The proposals built upon the measures included in the Safer Lorry Scheme, which launched in September 2015.

About the consultation

The consultation ran from 22 January to 4 March 2016. Details of the proposals were available at https://consultations.tfl.gov.uk/roads/safer-lorries.

About the results

We received 2,147 responses in total to the consultation.

82 per cent of all respondents said they supported or strongly supported the aim of strengthening lorry safety by requiring the fitting of clear vision panels in passenger-side doors. This figure was much higher among those who responded as individuals (96 per cent), but much lower (8 per cent) among those who responded as HGV drivers / operators / manufacturers.

Of those who supported the principle of requiring clear vision panels to be fitted in passenger side doors, more than half (56 per cent) supported a total ban of lorries.
that have not had clear vision panels fitted as the method for implementing the requirement. 11 per cent supported a ban applying at certain times of day or on certain routes only. Another 11 per cent supported a charge on all vehicles entering the London Low Emission Zone.

We received responses from 39 stakeholders.

We also received 1,446 identical responses based on a template created by the CTC cycling organisation.

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
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</thead>
<tbody>
<tr>
<td>General public</td>
<td>662</td>
</tr>
<tr>
<td>CTC campaign</td>
<td>1446</td>
</tr>
<tr>
<td>Stakeholders</td>
<td>39</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>2147</td>
</tr>
</tbody>
</table>

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

**Conclusion and next steps**

The responses show overwhelming support for improving direct vision for lorry drivers. However, recent research into direct vision from lorries has demonstrated that fitting glass panels would only deliver a very limited improvement in vision for the driver. In addition, such glass panels are not suitable for all vehicle types.

The Mayor has now launched TfL’s first Direct Vision Standard along with proposals for how it might be applied including banning the most dangerous ‘off-road’ lorries from the capital’s roads by January 2020. The standard assesses and rates how much an HGV driver can see directly from their cab in relation to other road users. The Standard will categorise HGVs using a five star rating system, ranging from zero stars for vehicles with the lowest direct vision, three stars for good levels of vision, to five stars for the highest levels. The plan is that only HGVs meeting 3 stars as part of the new standard will be allowed on London’s roads by 2024.

The Direct Vision Standard will be subject to consultation which will commence shortly. We will continue to work with vehicle manufacturers, regulators, the Department for Transport and freight operators to ensure that the proposed Direct Vision Standard is as far reaching as practicable within current legislation. This standard is the key to getting ever greater numbers of safer lorries operating on the streets of London.

We are also developing a plan to enable us, the rest of the GLA family and other public and private sector organisations to specify that these safer urban trucks are used widely by companies in supply chains.
1 About the proposals

We proposed to improve the safety of lorries in London so that they are less of a danger to other road users.

Why strengthen lorry safety requirements in London?

Lorries are disproportionately involved in fatal collisions with pedestrians and cyclists.

- Between 2010 and 2014, lorries were almost 10 times more likely to be involved in a fatal collision than cars;
- Seven of the nine cyclist fatalities in London in 2015 have involved lorries;
- 79 per cent of fatal collisions with cyclists in the past three years have involved lorries designed to be driven off-road.

Lorries are currently only required to have a window on the upper section of passenger-side door. This makes it difficult for drivers to have a direct view of pedestrians and cyclists who are near to the front left hand side of their vehicle.

Proposals

We proposed that the fitting of vision panels in passenger-side doors, wherever they can be fitted, should become the mandatory standard for lorries operating in London. Fitting an additional clear window panel to the lower section of the passenger-side door gives drivers a better, direct view of adjacent cyclists and pedestrians. Installation can cost between £1,000 and £1,500 and the window can be retrofitted, although they are not suitable or capable of being fitted to every lorry.

Implementation

We suggested two options for implementing such a requirement:

**Option A - Differential road charging to encourage higher vision lorries** – changing the central London Congestion Charge zone or the London-wide Low Emission Zone (LEZ) schemes so that a substantially higher charge is applied to lorries without the vision panels fitted to the passenger door, unless the panels are not capable of being fitted. Any modification to the charging schemes would be the subject of further consultation and would need to be approved by the Mayor.

**Option B - Restricting non-compliant vehicles** – seeking to place restrictions on lorries without passenger door vision panels, unless it’s not possible to fit them. This could be a total ban, operating 24/7; a specific time restriction, so that they can only operate at particular times of the day; or a route restriction, so that the whole or majority of their journey takes place on defined ‘safer routes’ (for example where cyclists are physically segregated from other road traffic). Non-compliant vehicles breaking these restrictions would be subject to a fine.
2 About the consultation

The consultation ran from 22 January to 4 March 2016. Details of the proposals were available at https://consultations.tfl.gov.uk/roads/safer-lorries.

Who was consulted

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

We also wrote to a number of key stakeholders directly to seek their views. These included London Boroughs and freight organisations. Please refer to Appendix B for a full stakeholder list.

Consultation material, distribution and publicity

To raise awareness of the consultation, we undertook a press launch at the start of the consultation period. We also placed adverts in pan-London and specialist trade media.

Analysis of responses

We commissioned Steer Davies Gleave to analyse the open and closed question consultation responses.

Analysis of closed question

The closed question 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 an individual
- As a HGV driver / operator / manufacturer – a grouping of:
  - As a HGV driver or operator
  - As a HGV manufacturer
- As a representative of an organisation – a grouping of:
  - As a representative of a Government Organisation
  - As a representative of a business
  - As a representative of a community or voluntary organisation
  - As a representative of a campaign group
- Other
- Not answered
- Email responses

Analysis of open question

Code frames were developed to structure the analysis of responses to the open question. There was only one open question, which asked respondents: “If you have any further comments to make about any of the options discussed, including about potential impacts, please provide them in the box below”.
A code frame was developed for this open question. The code frame consists of a series of themes and within these more detailed comments. The list below shows the themes discussed in response to the “any further comments” open question:

- Comment about clear vision panels
- Costs
- Cycling measures
- Enforcement
- Further measures
- Implementation
- Other concerns
- Safety
- Supportive
- Timescale
- Comment about consultation

Following agreement of the code frame with TfL, all open responses received were coded. Individual comments were coded to one or many of the codes within the code frame as relevant.

To ensure consistency between individuals coding responses, the first 50 responses coded by each analyst were checked by the Project Director.

3 Analysis of consultation responses

This analysis includes 701 responses, consisting of responses received from the general public and stakeholders. It does not include analysis of the 1,446 identical responses received as part of the CTC (Cycle Touring Club) campaign. These responses have been removed from this closed question analysis. A summary of this response and further analysis can be found in Chapter 5 of this report.

Respondent type

The breakdown of all respondents by their type is shown in

Figure 1. Respondents could give their views on the consultation via the online portal or directly via email. For those who responded via the portal, they answered a question 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 on their own behalf – 74 per cent. 10 per cent of respondents were employed in the HGV industry, with 6 per cent representing an organisation.

![Figure 1: Respondent type](image-url)
3.1 Analysis of closed questions

**Question 1: Do you support our aim of strengthening lorry safety by requiring the fitting of clear vision panels in passenger-side doors?**

Respondents were first asked if they support the proposed measure to improve lorry safety by fitting clear vision panels into passenger-side doors.

Figure 2 shows the responses to this question by respondent type. It shows that, among all respondents, 82 per cent support or strongly support the measure. Respondents employed in the HGV industry were the least supportive; 81 per cent tended to oppose or strongly opposed the proposal.

**Figure 2: Support for strengthening lorry safety by requiring clear vision panels**
Question 2: As you answered 'Strongly support' or 'support' to Question 1, how would you prefer to implement such a requirement?

Respondents who answered in support to Question 1 were asked how they would prefer to implement the requirement.

Figure 3 shows that more than half of all respondents (56 per cent) supported a total ban of lorries that have not had clear vision panels fitted as the method for implementing the requirement. 11 per cent of all respondents supported a ban applying at certain times of day or on certain routes only. Another 11 per cent supported a charge on all vehicles entering the London Low Emission Zone.

Figure 3: Preference for implementation of requirement for clear vision panels

<table>
<thead>
<tr>
<th>Method of Implementation</th>
<th>As an individual</th>
<th>As a HGV driver/ operator/ manufacturer</th>
<th>As a representative of an organisation</th>
<th>Other</th>
<th>Not answered</th>
<th>Email responses</th>
<th>All respondents (inc. email responses)</th>
</tr>
</thead>
<tbody>
<tr>
<td>By a ban which applies only at certain times of the day or on certain routes</td>
<td>67%</td>
<td>5%</td>
<td>3%</td>
<td></td>
<td>12%</td>
<td>8%</td>
<td>13%</td>
</tr>
<tr>
<td>By a total ban</td>
<td>13%</td>
<td>19%</td>
<td>56%</td>
<td></td>
<td>12%</td>
<td>8%</td>
<td>19%</td>
</tr>
<tr>
<td>By a differential charge for lorries entering the London-wide Low Emission Zone</td>
<td>9%</td>
<td>24%</td>
<td>17%</td>
<td></td>
<td>12%</td>
<td>8%</td>
<td>9%</td>
</tr>
<tr>
<td>By a differential charge for lorries entering the central London Congestion Charge zone</td>
<td>12%</td>
<td>3%</td>
<td>50%</td>
<td></td>
<td>33%</td>
<td>63%</td>
<td>11%</td>
</tr>
</tbody>
</table>
3.2 Analysis of open question

Question 3: If you have any further comments to make about any of the options discussed, including about potential impacts, please provide them

As outlined in Chapter 2, each open response received was coded according to key comments. Each key comment was then assigned under broader theme headings. 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 Table 1. It shows that the most common type of comment referred to issues around the implementation of the requirement (22 per cent). Comments suggesting potential further measures were the next most common (18 per cent), followed by cycling measures (18 per cent), comments regarding the clear vision panels (11 per cent) and comments referring to safety in general (11 per cent).

Table 1: Summary of open response themes

<table>
<thead>
<tr>
<th>Theme</th>
<th>Online portal</th>
<th>Email responses</th>
<th>All responses</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Implementation</td>
<td>508</td>
<td>37</td>
<td>545</td>
<td>22%</td>
</tr>
<tr>
<td>Further measures</td>
<td>401</td>
<td>48</td>
<td>449</td>
<td>18%</td>
</tr>
<tr>
<td>Cycling measures</td>
<td>418</td>
<td>16</td>
<td>434</td>
<td>18%</td>
</tr>
<tr>
<td>Comment about clear vision panels</td>
<td>222</td>
<td>53</td>
<td>275</td>
<td>11%</td>
</tr>
<tr>
<td>Safety</td>
<td>241</td>
<td>20</td>
<td>261</td>
<td>11%</td>
</tr>
<tr>
<td>Supportive</td>
<td>163</td>
<td>20</td>
<td>183</td>
<td>7%</td>
</tr>
<tr>
<td>Costs</td>
<td>136</td>
<td>10</td>
<td>146</td>
<td>6%</td>
</tr>
<tr>
<td>Enforcement</td>
<td>45</td>
<td>2</td>
<td>47</td>
<td>2%</td>
</tr>
<tr>
<td>Timescale</td>
<td>38</td>
<td>6</td>
<td>44</td>
<td>2%</td>
</tr>
<tr>
<td>Unsupportive</td>
<td>27</td>
<td>4</td>
<td>31</td>
<td>1%</td>
</tr>
<tr>
<td>Other concerns</td>
<td>20</td>
<td>1</td>
<td>21</td>
<td>1%</td>
</tr>
<tr>
<td>Comment about consultation</td>
<td>8</td>
<td>1</td>
<td>9</td>
<td>0%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>2227</strong></td>
<td><strong>218</strong></td>
<td><strong>2445</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>
The following sections look in more detail at the comments left under each theme.

**Implementation**

The most common comment under the implementation theme was support for a ban on lorries which do not comply with the requirement for clear vision panels (216 respondents). A further 67 respondents opposed a partial ban as it would shift danger to routes or times outside the ban zone or ban time period. 50 respondents stated their opposition to differential charging for non-compliant lorries. 45 respondents suggested that lorries already fitted with adequate vision technologies (i.e. cameras, mirrors or sensors) should be exempt from the requirement for clear vision panels.

26 respondents supported requiring all new lorries to fit clear vision panels but opposed retrofitting existing lorries. Another 25 respondents suggested implementing differential charging for a transition period moving towards a full ban on non-compliant lorries. A ban on non-compliant lorries at certain times of day was suggested by 18 respondents. 16 respondents stated that if differential charging is implemented, the charge must be high enough to act as a proper deterrent. Another 16 respondents said that London requires lorries in order to function, while a further 16 supported the proposal to implement differential charging for non-compliant lorries. 12 respondents commented in support of restricting non-compliant lorries to certain routes.

**Further measures**

The most common comment in this section supported a peak hour ban on all lorries in central London (55 respondents). The next most written comment suggested camera surveillance around lorries to detect cyclists (51 respondents). 39 respondents stated that lorry driver education for sharing the road with cyclists should be improved. 33 respondents said that more ambitious proposals than the requirement for clear vision panels are need to improve lorry and cyclist safety. 29 respondents supported a ban on all lorries in central London at all times.

24 respondents suggested that vans be used to deliver goods in central London, rather than large lorries. 18 respondents were in favour of the requirement being extended across the whole of the UK. Another 18 suggested learning lessons from other European cities. 17 more comments were left in support of dropped seat position lorry cabs, with another 16 supporting the fitting of improved mirrors on lorries. 16 respondents proposed the fitting of auditory warnings for cyclists on lorries.

12 respondents wrote in support of direct vision lorry cabs. 11 were in favour of tougher sanctions for drivers who kill or injure cyclists or pedestrians, while another 11 respondents had concerns about the incentives that ‘pay per load’ payments give to lorry drivers to drive quickly.

**Cycling measures**

The most prevalent comment under this theme was a suggestion to improve road safety education for cyclists (170 respondents). Another 112 respondents requested tighter controls on cyclist road behaviour. 52 comments were made in support of the construction of more segregated cycle lanes. 51 respondents were concerned over cyclists going down the nearside of lorries. 29 respondents were in support of improved cycling provision, while 18 suggested mandating cyclists to wear high visibility clothing and use lights.
Comment about clear vision panels

The most common comment in this theme was that people thought that clear vision panels only offer a limited improvement in vision (56 respondents). 54 respondents suggested that there is often an obstruction to vision on the passenger seat or in the foot well, such as boxes or a passenger. A further 38 respondents stated that installing clear vision panels will prevent the existing window from being wound down, while 30 respondents were concerned an extra window to check would give drivers too many places to check. A further 27 respondents commented that clear vision panels are unsuitable for sleeper cabs as they invade drivers’ privacy and make it easier to break in.

The comment that clear vision panels are not always possible to retrofit was left by 27 respondents. 18 respondents were concerned about the safety of retrofitted doors in the event of an accident. Another 17 respondents requested evidence that the panels would be effective at reducing danger to cyclists.

Safety

The majority of comments in this theme were in general support of measures to make lorries safer for cyclists (170 respondents). 40 further respondents stated their concern about HGV driver behaviour, while another 18 were concerned about poor sightlines down the side of lorry trailers. 11 respondents left a comment regarding TfL inaction over lorry and cyclist safety with 10 respondents concerned about poor forward sightlines from lorry cabs.

Supportive

The only comment under this theme was respondents stating their support for the proposed introduction of clear vision panels (183 respondents).

Costs

The most common comment in this theme was 98 respondents opposing extra costs for businesses. 28 respondents stated that the proposed requirement will not cost HGV operators much to install, while another 20 respondents suggested subsidies for businesses to help implementation of the requirement.

Enforcement

Two main comments were made under this theme. 23 respondents requested that existing laws and regulations are properly enforced before the implementation of new ones. 23 respondents said the requirement must be properly enforced once it is implemented.

Timescale

Under the timescale theme, 27 respondents stated that the requirement should be implemented as soon as possible, while 17 respondents commented in support of gradual implementation.

Unsupportive

There was only one comment in this theme: 31 respondents opposed the introduction of clear vision panels.
Other concerns

The only comment made by more than one respondent in this theme was a concern for pollution from lorries (18 respondents).
3.3 Responses from stakeholders

Elected representatives

Justine Greening MP, Putney, Roehampton and Southfields
- Strongly supports further measures to strengthen lorry safety requirements in London. Approves the use of clear-vision panels in passenger-side doors wherever possible to aid visibility
- Recommends further work by the Government and the European Commission to update existing legislation to include these vision standards as part of the vehicle type-approval process for lorry manufacturers
- Supports further testing of new electronic devices which warn of cyclists’ and pedestrians’ proximity
- Highlights the need to achieve the correct balance between cost and safety in order to allow businesses sufficient time to have a realistic prospect of changing their vehicles
- On the options for implementation, suggests that any road safety changes should be introduced sooner rather than later

Cllr Colin Smith, London Borough of Bromley
- Concerned that the scheme would increase costs to businesses, and indirectly, to taxpayers at a difficult financial time. This is particularly relevant when applied to vehicles which will be approaching the end of their effective working lives

Caroline Pidgeon AM, Liberal Democrat Group – London Assembly
- Strongly supports introducing a requirement for lorries in London to be fitted with vision panels in passenger side doors, however, enforcing a differential charge would be overly complicated and confusing. A total ban for non-compliant vehicles would be simpler to implement
- Any exemption for vehicles that cannot be retrofitted should expire in 2020
- Proposes a rush hour ban on HGVs in central London, and seeks greater use of the River Thames for the transportation of freight and goods

Teresa Villiers MP, Chipping Barnet
- Supports the fitting of vision panels in passenger-side doors, and that this should become the mandatory standard for lorries operating in London

Local Authorities

Birmingham City Council
- Strongly supports the scheme aims and believes that the scheme should be adopted nationwide
- A differential charge for lorries entering the London-wide Low Emission Zone (LEZ) would be preferred
London Borough of Ealing
- Expresses concern that Boroughs, London Councils and the Transport and Environment Committee (TEC) were not engaged prior to this consultation being launched
- The proposals advocate the introduction of one possible solution to the issue of lorry safety - but many others exist. No evidence has been presented in the consultation to support the effectiveness of the proposed scheme when compared with other alternative
- Ealing Council favour the implementation of detection systems and believe these to be more effective than the proposed clear-vision scheme

London Borough of Enfield
Supports the proposed aims of improving lorry safety by requiring, but has the following concerns:
- Retrofitting clear-vision panels poses technical difficulties and the associated costs
- Extended view passenger-side mirrors already in use provide the same view
- A range of solutions should be considered rather than a single solution being specified
- LB Enfield supports implementation via a differential charge for lorries entering the London-wide Low Emission Zone but seeks clarification on how vehicles entering from outside the United Kingdom would be charged
- A total ban or a ban by time / route would be impractical.

London Councils
- London Councils is concerned that engagement was not carried out with boroughs before wider public consultation, and recommend further engagement is carried out following this consultation
- Supports further improvements to lorry safety in London. However, requirements to retrofit will have significant cost implications for local residents, businesses, and boroughs and a detailed cost benefit analysis is required
- Alternative options such as cycle sensors and cameras need to be considered
- London Councils does not support differential road charging to improve lorry safety, but is supportive of improving safety standards using an enhanced Safer Lorry Scheme traffic order, subject to consultation and borough approval, and states support for changes to national/European legislation to improve lorry safety more widely.

London Borough of Havering
- Welcomes the possibility of an exemption from restrictions for vehicles that are not suitable for conversion, but requests that further work is done to investigate the financial impact that the proposals may have
- Requests further assessment of the impact that restrictions or additional charges could have on businesses
- Supports further investigation into other options to improve safety (i.e. electronic detection devices)

**London Borough of Hillingdon**
- Supports the fitting of vision panels in passenger-side doors, and that this should become the mandatory standard for lorries operating in London
- Supports the additional introduction of automated detection systems

**London Borough of Lewisham**
- Tend to oppose the proposals
- Retrofitting clear view panels may not be a practical possibility due to the construction of some vehicles

**London Borough of Redbridge**
Supports the proposed scheme, but suggests further consideration is the following areas:
- Clear-vision panels are still reliant on the driver checking line of sight at the correct time
- Concerns about complications with vehicular Construction and Use Regulations, such as whether retrofitting would compromise cab strength. Modifying a vehicle may have implications for vehicle fleet insurance
- Potential additional costs implied by retrofitting include air-conditioning to compensate for fixed windows after installation. Adding an extra window may compromise the security e.g. for drivers of high value loads
- Significant cost implications for freight industry which will inevitably be passed on to London’s residents
- No preference for the use of either a ban or a charging mechanism as to the method, but any ban should apply at all times of the day and night, and on all routes within the chosen geographical area

**London Borough of Richmond upon Thames**
- Supports the proposals but is concerned about the implications of the scheme
- Does not favour differential road charging as a method of enforcement and highlights complications in imposing a total ban. Enforcement may be difficult due to the variety of cab types and suitability for retrofitting, including potential variations in the size of the additional panel and differences in specification
- Suggests alternative measures to be fitted in cases where vehicles cannot be converted – such as the option to fit approved camera systems
- Camera systems may be a more viable alternative for smaller businesses for whom early vehicle replacement would be unaffordable
- Recommends implementing within 3 years

**Royal Borough Kensington and Chelsea**
- Supports the proposal in principle
- Raises concern that an in-cab passenger could obscure the direct vision panel
- Favours a London-wide ban on non-compliant vehicles
**Freight interest groups**

**Brewery Logistics Group**
Brewery Logistics Group request that the proposals are reconsidered and expressed the following concerns:

- Retrofitting clear vision panels in some manufacturers’ vehicles is not possible due to the configuration of panels. Manufacturers do not offer near-side lower door window options on all new models.
- Brewery industry deliveries require two crew members. Near-side panels could potentially be obscured by passenger’s legs, or in some cases by the empty passenger seat.
- Additional safety aspects can distract the driver from looking ahead, proving more dangerous, and retrofitting will be mandatory, even for those that have already taken other steps to eliminate ‘blind spots’.
- The additional costs of installation of these safety measures will add to making distribution and logistics more expensive in London. Some operators are already adopting technology that out-performs the introduction of the vision panel.
- Request further training and stricter enforcement for cyclists, with special emphasis on the dangers lorry ‘blind spots’.

**British Vehicle Rental and Leasing Association (BVLRA)**
- Does not support the proposal as it believes it will not deliver the road safety benefits and reduce the driver blind spots that contribute to accidents.
- The panel would be easily blocked by a passenger. Automatic detection devices are preferable.
- Costs incurred in retrofitting are likely to be higher than stated when considering costs for replacement vehicles whilst fitting takes place.
- Regulation of vehicle design should be defined at national government level by type approval regime and construction and use regulations.
- BVLRA recommends enforcement by a Penalty Charge Notice scheme is preferable to differential charging or a total ban, as camera based enforcement would likely prove to be problematic.

**Freight Transport Association (FTA)**
- Does not support the proposal on the basis that it is too limited.
- The benefits of transparent side panels are unproven and may be limited. FTA generally supports the use of vehicles with increased direct vision but alternative options exist which are more cost effective and may prove more effective. These need to be investigated and evidence provided which supports any recommended option.
- Transparent door panels have limitations, preventing the upper window being lowered and mirror readjustment; and retrofitting glass into the door could potentially compromise the safety of the cabin in a crash.
Suggests other options for proposals may be more viable, including incentivised charges for the safest vehicles and promotion of sensors and cameras in line with CLOCS

**The Society of Motor Manufacturers & Traders (SMMT)**
- Tend to oppose the proposals and does not feel that technical issues have been fully considered, such as inability to retrofit some manufacturers’ vehicles, and the variety in the field of vision dependent on cab size
- Raised concerns relating to the effect that this might have on the structural integrity of the vehicle
- Enforcement would be complicated by vehicles which would require exemption due to the lack of retrofit options

**Mineral Products Association**
- Strongly opposes the scheme
- Agrees that fitting additional glass panels in doors can increase visibility and safety but believes the scheme should be extended to require vehicles to match the CLOCS requirements
- This would ensure consistency, and fitting and retrofitting cameras and/or sensors to CLOCS standards should be priority
- Expresses concerns about feasibility of retrofitting additional glass panels to all existing vehicles

**Road Haulage Association (RHA)**
- Strongly opposes proposal on the basis of very high cost and minimal benefit
- Costs are likely to be higher than estimated, and would need to account for temporary loss of vehicle during retrofitting
- Enhanced field of vision provided by clear-panels is already covered by recently improved mirrors, and the additional requirement for the driver to check the near-side panel could prove to be a distraction
- Recommends further emphasis on cyclist education would be advantageous to prevent poor cycling practices
- Practical considerations may reduce effectiveness: additional passengers may obscure view
- Raises concerns about the effect retrofitting will have on the structural safety of the cab and the ability to open the window once installed
- Support the search for constant improvement in road safety, but this should include infrastructure design, vehicle design, and awareness of (and attitude to) risk among all road users.
- The impact of the proposed change is unclear and should be compared with a range of safety improvements
Transport interest groups

Cyclists’ Touring Club, CTC

- CTC supports this proposal as vision panels improve lorry drivers’ direct vision of cyclists and pedestrians, but requests that further steps are taken to make ‘direct vision’ standard over time
- Lorry cabs should be designed to place their drivers closer to ground level and with a view enabling them to see cyclists and pedestrians as easily as bus drivers can
- The requirement should apply to all lorries over 3.5 tonnes, with no exemptions for retrofitting
- Suggests that all lorry cabs can be retrofitted
- The requirement should apply 24 hours a day, seven days a week. Specific time restrictions would be difficult to enforce, and less effective in encouraging fleet operators to retrofit their entire vehicle fleet
- The requirement should apply across Greater London, without route exemptions
- The requirement should be swiftly and easily enforceable. CTC prefers the Traffic Regulation Order option, as this mandates vehicle design change, but may support differential road charging if this allows for more effective enforcement
- Recognise that the vision panels proposed in the current consultation are a valuable step forward, but not the long term safer lorry design solution that is ultimately needed. Suggests that proposals should go further
- CTC suggests the setting of a ‘roadmap’ and outlines the steps which it believes would achieve a long-term aim of banning all non-direct vision lorries by 2025 and highlight the potential to prevent serious injuries and fatalities
- The content of CTC’s response to consultation also forms the basis of a large number of template responses received during the consultation. For further information and a full copy of this text - please see section 3.4

Vision Zero

- Strongly supports proposed scheme and favours a differential charge for lorries entering the London-wide Low Emission Zone
- Recommends additional restriction on Heavy Goods Vehicles (HGVs), limiting use to arterial roads, unless they need to access a particular site. HGVs entering London should have their routes risk-assessed and approved

Living Streets

- Strongly supports proposed scheme and favours the total ban of non-compliant vehicles in London. The Congestion Charge and LEZ payments have been established as differential payments to address specific issues – this is not appropriate for the Safer Lorries scheme.
- More regulation is needed of HGVs outside peak travel hours to prevent pedestrian and cyclist fatalities
- Operators should bear the costs of implementing the scheme
London Cycling Campaign, (LCC)
• The London Cycling Campaign supports the longer term aims of the proposals but feels that further steps are required
• Supports the proposal to fit clear-vision panels in the short term but believes that low-entry, panoramic vision/ direct vision lorries should be standard in London and specified in contracts with operators/ businesses. A specific date should be set by which all lorries entering London, unless exempt, should be low entry, panoramic vision design
• Favours the use of Traffic Regulation Orders to enforce the scheme, rather than differential road charging, as use of TROs would be cheaper and more effective

Campaign for Better Transport
• Strongly support proposed scheme and favours a total ban as an essential first step to introducing robust safety measures.
• Restrictions on HGVs on certain routes or at certain times should be considered regardless of installed safety measures

Alliance of British Drivers
• Strongly opposes the proposals and is against any local regulation that is not adopted nationally as this complicates operations, particularly for long distance operators

Action on Lorry Danger
• Strongly supports proposals and notes that Clear-vision panels are a suitable interim measure until low-entry lorries and panoramic vision become standard
• Favours a total ban on non-compliant vehicles, with a swift introduction
• Further research and design is needed to help define minimum required panel dimensions
• Public sector organisations and councils should require by contract the use of compliant vehicles, and this requirement should be incorporated into planning consents for new building developments

RoadPeace
• RoadPeace supports the proposals and favours a total ban of non-compliant vehicles from London
• Requests further work is done to develop specific milestones and a roadmap to mandate direct vision lorries by a certain date

Manufacturers

Dennis Eagle
• Supports the proposed scheme, favouring a ban which applies only at certain times of the day or on certain routes
• Believes that the fitting bus-type doors or a low entry cab should be sufficient in low level cabs, with clear panels obligatory in high level cabs
• Suggests a policy of implementation of clear panels based on a minimum door panel height. Visibility in low entry cabs remains better than in high cabs, even with an additional window fitted
DAF Trucks Limited
The effectiveness of the proposed changes are unproven and may be marginal for the following technical reasons:

- The view through the additional panel is more limited than is provided by the mirrors, but with an additional area to view there is more scope for driver distraction. The additional panels may give a false impression that the nearside of the vehicle is clear, when it is not. Cyclists approaching from the rear of the vehicle, as it starts to turn, may not be visible in the proposed window.
- The view from the proposed window may be regularly obscured by dirt, items in the foot well, or even the passenger seat.
- Unregulated conversions or retrofits could have a number of negative safety consequences. There are no defined field of view requirements for the additional window, meaning poor conversions could undermine the objective of the proposal.
- Passenger window opening function may be inhibited by fitting additional window panels, making cleaning and adjustment of the mirrors more difficult.
- Cab strength may be compromised, and the risk of theft from or of the vehicle increased.

Nissan Europe
- Strongly supports the proposals and favours a total ban on non-compliant vehicles.

Mercedes Benz
- Retrofitting of ‘vision panels’ is not recommended by Mercedes-Benz for the following reasons:
  - Crash protection / cab is likely to be compromised by modification. A door modification would invalidate regulated system approvals (‘exterior projections of cabs’, ‘safety glazing’ and ‘cab strength’) so the vehicle Certificate of Conformity (CoC) will be invalidated. Security of the cab would also be compromised and other practical complications would be evident from retrofitting.
  - Direct vision will be still be restricted by the passenger seat.
  - Concerns raised over the specification of materials used in retrofitting and the availability of materials.
  - Highlights lack of definition of the field of vision required, and the range of vehicles in scope of the proposals.

Volvo Group UK Ltd
- Clear-vision panels should be considered as a part of a number of safety measures, not as a single solution. The benefits of other technologies and safety features should be assessed and compared with clear-vision panels.
- Regulations on window types may compromise or limit alternative or complementary improvements.
- Retrofitting should be regulated and carried out by approved parties.
- Criteria for vehicle assessment and exemption must be agreed.
- The area in which the new regulations would be applied needs to be defined ASAP.
Businesses

National Grid
- Strongly opposes the proposals, believing that it does not present a practical or easy solution – unless manufacturers build the panels into the vehicles
- Retrofitting panels would be costly and complicated and clear-vision panels do not eliminate blind spots. Suggests rear facing cameras are a cheaper and more effective option

DHL
- Supports the principle of direct vision through the fitting of vision panels in passenger-side doors, but is concerned about this being mandatory for HGVs operating in London
- The benefit of transparent side panels is dependent on whether the vehicle has been specifically designed to incorporate them
- The cost of implementing this policy proposal is unlikely to be proportionate to the benefit delivered in terms of increasing safety
- Would prefer an assessment of a range of potential options, which considers the improvements already made
- Raises concerns that this local regulation requires creation of ‘London-only’ fleets which could potentially limiting efficiency of operation
- Favours differential road charging over a total ban but suggests introducing incentives for compliance

Superdrug Stores Plc
- Proposals would only improve visibility of other road users in a limited position, and raises concerns that adding more visual reference points for drivers to check would cause distraction. Consideration should instead be given to educating and licencing cyclists
- HGVs are currently fitted with mirrors which provide already provide the required range of vision
- The view through additional side panels will be too easily obscured by passengers or dirt, and will provide less protection in the event of a side-on collision

Tideway
- Supports the proposals for further improvements to vehicle safety standards
- Tideway supports the mandatory use of lorries over 3.5t GVW with a glass panel fitted to the lower door, and requiring older vehicles to be retrofitted
- Tideway would support the amendment of the current Safer Lorries Scheme pan-London Traffic Regulation Orders. This should operate on all roads in Greater London except motorways to have the greatest safety impact
- A suitable lead-in time should be allowed of around six months' notice to enable operators to plan

John Lewis Partnership
Supports improvements in lorry safety, but disagrees that the proposed solution would be the most effective:
New vehicles feature cabs which have lower overall heights and better all round visibility and there are a wide range of mirrors, cameras, and audible warning devices available to assist the driver in safely turning and driving.

The fitting of a cab door window should only be requirement if the vehicle is not already fitted with cameras and/or other suitable warning devices.

**Business Improvement Districts**

**Heart of London Business Alliance**

- Supports the principle of fitting vision panels in the passenger side doors of lorries and a 'direct vision standard' that is legal and enforceable.
- Suggests implementing an incentivised differential charging scheme with a reduction in charges for new vehicles or those retrofitted with the new passenger-side panels. Reduced costs for compliant vehicles could off-set by higher charges for vehicles that do not meet the new requirements.
3.4 Campaign response from CTC

As previously mentioned, 1,446 identical responses were received via email based on a template response created by the CTC and available on its website. This response has been coded according to its key themes, which are consistent with those used to code all responses. The key themes for the CTC response are shown below:

<table>
<thead>
<tr>
<th>Theme</th>
<th>Comment</th>
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</thead>
<tbody>
<tr>
<td>Enforcement</td>
<td>Ensure the requirement is properly enforced once implemented</td>
</tr>
<tr>
<td>Further measures</td>
<td>Encourage uptake of direct vision cabs</td>
</tr>
<tr>
<td>Implementation</td>
<td>Supports ban for non-compliant lorries</td>
</tr>
<tr>
<td>Safety</td>
<td>Support measures to make lorries safer for cyclists</td>
</tr>
<tr>
<td>Supportive</td>
<td>Support introduction of clear vision panels</td>
</tr>
<tr>
<td>Timescale</td>
<td>Implement ASAP</td>
</tr>
<tr>
<td>Further measures</td>
<td>Supports CTC ‘roadmap’ to ban non-direct vision lorries in London by 2025</td>
</tr>
</tbody>
</table>

The response is shown in full here:

“As someone who cycles in London, I am concerned about the number of cyclists and pedestrians killed or seriously injured by lorries on London’s roads. I am therefore encouraged by the news I have heard from CTC, the UK national cycling charity, that TfL has opened a consultation on further improving lorry safety.

I understand that TfL has proposed that the fitting of vision panels in passenger-side doors should become mandatory for lorries operating in London. I support that proposal. I also agree with CTC’s suggestions that any ban for lorries without vision panels should apply across Greater London and operate 24 hours a day, seven days a week, and be implemented as quickly as possible in a way which can be swiftly and strictly enforced.

Whilst vision panels do increase driver visibility the long term aim should be the widespread up-take of low-entry, panoramic vision lorries (direct vision), which would provide major improvements in driver visibility and safety. To make this aim a reality I support CTC’s ‘roadmap’, setting out a timescale for moving to banning non-direct vision lorries by:

1. Extending the existing Lorry Safety Scheme to ban lorries that are not fitted with a passenger-side door vision panel;
2. TfL and all 33 London Borough Councils (the Boroughs) agreeing to express a preference for direct vision lorries in all planning applications and publicly funded contracts they are involved in;

3. TfL and the Boroughs agreeing to make direct vision lorries a contractual requirement by 2020, by which time they should be more widely available;

4. TfL committing to ban lorries which do not meet direct vision standards from London’s roads by 2025.

I urge you to consider these proposals, and take steps to implement immediate changes to require vision panels, and implementing a ‘roadmap’ which will ensure that direct vision lorries become a legal requirement in London as soon as possible. Both are critically important if the Mayor and TfL’s stated ambition for London to be a city with roads free from death and serious injury is to be achieved.”

4 Conclusion and next steps

The responses show overwhelming support for improving direct vision for lorry drivers. However, recent research into direct vision from lorries has demonstrated that fitting glass panels would only deliver a very limited improvement in vision for the driver, In addition, such glass panels are not suitable for all vehicle types.

The Mayor has now launched TfL’s first Direct Vision Standard along with proposals for how it might be applied including banning the most dangerous ‘off-road’ lorries from the capital’s roads by January 2020. The standard assesses and rates how much an HGV driver can see directly from their cab in relation to other road users. The Standard will categorise HGVs using a five star rating system, ranging from zero stars for vehicles with the lowest direct vision, three stars for good levels of vision, to five stars for the highest levels. The plan is that only HGVs meeting 3 stars as part of the new standard will be allowed on London’s roads by 2024.

The Direct Vision Standard will be subject to consultation which will commence shortly. We will continue to work with vehicle manufacturers, regulators, the Department for Transport and freight operators to ensure that the proposed Direct Vision Standard is as far reaching as practicable within current legislation. This standard is the key to getting ever greater numbers of safer lorries operating on the streets of London.

We are also developing a plan to enable us, the rest of the GLA family and other public and private sector organisations to specify that these safer urban trucks are used widely by companies in supply chains.
Appendix A – List of stakeholders consulted

<table>
<thead>
<tr>
<th>Elected Members</th>
<th>Ward</th>
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<tbody>
<tr>
<td>Ian Duncan Smith MP</td>
<td>Chingford and Woodford Green</td>
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<td>Andrew Rosindell MP</td>
<td>Romford</td>
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<tr>
<td>Andrew Slaughter MP</td>
<td>Hammersmith</td>
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<tr>
<td>Virendra Kumar Sharma MP</td>
<td>Ealing, Southall</td>
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<td>Bob Blackman MP</td>
<td>Harrow East</td>
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<td>Bob Stewart MP</td>
<td>Beckenham</td>
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<td>Thomas Brake MP</td>
<td>Carshalton and Wallington</td>
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<tr>
<td>James Brokenshire MP</td>
<td>Old Bexley and Sidcup</td>
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<td>Karen Buck MP</td>
<td>Westminster North</td>
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<td>Diane Abbott MP</td>
<td>Hackney North and Stoke Newington</td>
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<td>Chuka Umunna MP</td>
<td>Streatham</td>
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<tr>
<td>James Clappison MP</td>
<td>Hertsmere</td>
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<tr>
<td>Clive Efford MP</td>
<td>Eltham</td>
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<td>Jeremy Corbyn MP</td>
<td>Islington North</td>
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<td>Jon Cruddas MP</td>
<td>Dagenham and Rainham</td>
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<tr>
<td>David Gauke MP</td>
<td>South West Hertfordshire</td>
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<tr>
<td>Emily Thornberry MP</td>
<td>Islington South and Finsbury</td>
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<td>David Evennett MP</td>
<td>Bexleyheath and Crayford</td>
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<td>Michael Fallon MP</td>
<td>Sevenoaks</td>
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<td>Mike Gapes MP</td>
<td>Ilford South</td>
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<tr>
<td>Barry Gardiner MP</td>
<td>Brent North</td>
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<tr>
<td>Gareth Johnson MP</td>
<td>Dartford</td>
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<tr>
<td>Gavin Barwell MP</td>
<td>Croydon Central</td>
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<tr>
<td>Cheryl Gillan MP</td>
<td>Chesham and Amersham</td>
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<tr>
<td>Chris Grayling MP</td>
<td>Epsom and Ewell</td>
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<tr>
<td>Justine Greening MP</td>
<td>Putney</td>
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<tr>
<td>Mark Field MP</td>
<td>Cities of London and Westminster</td>
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<tr>
<td>Stephen Hammond MP</td>
<td>Wimbledon</td>
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<tr>
<td>Harriet Harman MP</td>
<td>Camberwell and Peckham</td>
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<tr>
<td>Margaret Hodge MBE</td>
<td>Barking and Dagenham</td>
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<tr>
<td>Heidi Alexander MP</td>
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<td>Meg Hillier MP</td>
<td>Hackney South and Shoreditch</td>
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<td>Jo Johnson MP</td>
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<td>John Cryer MP</td>
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<td>Kwasi Kwarteng MP</td>
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<tr>
<td>David Lammy MP</td>
<td>Tottenham</td>
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<td>Lyn Brown MP</td>
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<td>Fiona Mactaggart MP</td>
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<td>Greg Hands MP</td>
<td>Chelsea and Fulham</td>
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<td>Member</td>
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<td>Matthew Offord MP</td>
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<td>Mike Freer MP</td>
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<td>Bob Neill MP</td>
<td>Bromley and Chislehurst</td>
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<td>Eric Pickles MP</td>
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<td>Richard Harrington MP</td>
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<td>Sadiq Khan MP</td>
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<td>Grant Shapps MP</td>
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<td>Eleanor Laing MP</td>
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<td>Dominic Raab MP</td>
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<td>Charles Walker MP</td>
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<td>Zac Goldsmith MP</td>
<td>Richmond Park and North Kingston</td>
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<td>Steve Reed MP</td>
<td>Croydon North</td>
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<td>Seema Malhotra MP</td>
<td>Felton and Heston</td>
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<td>Dawn Butler MP</td>
<td>Brent</td>
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<tr>
<td>Tulip Siddiq MP</td>
<td>Hampstead and Kilburn</td>
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<tr>
<td>Keir Starmer MP</td>
<td>Holborn and St Pancras</td>
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<td>Chris Philip MP</td>
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<tr>
<td>Rupa Huq MP</td>
<td>Ealing Central and Acton</td>
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<td>Teresa Pearse MP</td>
<td>Erith and Thamesmead</td>
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<tr>
<td>Matthew Pennycook MP</td>
<td>Greenwich and Woolwich</td>
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<tr>
<td>John McDonnell MP</td>
<td>Hayes and Harlington</td>
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<td>Ruth Cadbury MP</td>
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<td>Helen Hayes MP</td>
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<td>Vicky Foxcroft MP</td>
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<td>Siobhain McDonagh MP</td>
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<td>Neil Coyle MP</td>
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<td>Victoria Borwick MP</td>
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</tbody>
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**Local Authorities**
- London Borough of Barking and Dagenham
- London Borough of Barnet
- London Borough of Bexley
- London Borough of Brent
- London Borough of Bromley
- London Borough of Camden
- City of London
- London Borough of Croydon
- London Borough of Ealing
London Borough of Enfield
Royal Borough of Greenwich
London Borough of Hackney
London Borough of Hammersmith and Fulham
Royal Borough of Kensington and Chelsea
London Borough of Haringey
London Borough of Harrow
London Borough of Hillingdon
London Borough of Hounslow
London Borough of Islington
London Borough of Richmond-Upon-Thames
Royal Borough of Kingston-Upon-Thames
London Borough of Lambeth
London Borough of Lewisham
London Borough of Merton
London Borough of Newham
London Borough of Redbridge
London Borough of Southwark
London Borough of Sutton
London Borough of Tower Hamlets
London Borough of Waltham Forest
London Borough of Wandsworth
London Borough of Westminster

**Police and Health Authorities**
Metropolitan Police
London Fire and Emergency Authority
London Fire Brigade

**Transport Groups**
Association of British Drivers
Institute of Advance Motorists
Road Haulage Association
Freight Transport Association
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
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
HS2 Ltd
Office of Rail Regulation
Crossrail Ltd
Transport for Greater Manchester

**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 Children’s 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
Confederation of British Industry
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<td>Royal Institution of Highways &amp; Transportation</td>
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<td>Campaign for Clean Air in London</td>
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<td>Society for London Theatre</td>
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<td>House of Commons</td>
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<td>Visit Britain</td>
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</table>
Dear Stakeholder

Re: Improving lorry safety requirements – Have your say

Transport for London is consulting on proposals to improve the safety of lorries in London so that they are less of a danger to other road users.

In September 2015, the Mayor, TfL and London Councils launched the ground-breaking Safer Lorry Scheme. Lorries over 3.5 tonnes are now banned across London unless they are fitted with required safety equipment, including mirrors and side guards. The Safer Lorry Scheme covers every road in Greater London, except motorways, and operates 24 hours a day, seven days a week. We are now looking to further improve the safety of lorries as part of this consultation.

At present, lorries are currently only required to have a window on the upper section of passenger-side door. This makes it difficult for drivers to have a direct view of pedestrians and cyclists who are near to the front left hand side of their lorry.

We propose that the fitting of vision panels in passenger-side doors, wherever they can be fitted, should become the mandatory standard for lorries operating in London. Fitting an additional clear window panel to the lower section of the passenger-side door gives drivers a better, direct view of adjacent cyclists and pedestrians.

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

Please note that the consultation closes on 4 March 2016.

Yours sincerely

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Appendix C - Responses to key issues raised

Implementation

Retrofitting cab doors
There are commercial companies in the market that can fit additional glass panels retrospectively. However, we are aware that some vehicles would be unsuitable for retrofitting, such as some models whose door shape leaves too little ‘skin’ for an effective window. Identifying which vehicles can and cannot be fitted retrospectively would require extensive consultation with the varying manufacturers for new vehicles. Should this proposal be taken forward, we would compile a list of vehicle models that would be exempt.

Clear vision panels – obstruction
Changing the design or features of a vehicle does not guarantee increased safety for road users – any new safety features must be used properly to ensure that they are effective. In the case of windows in the lower part of HGV doors, drivers should ensure that items that might obstruct vision are stored elsewhere, such as in a cab locker. In the case of a passenger obscuring the driver’s vision through this window, best practice promotes vigilance on the part of the driver and assistance to the driver in identifying potential hazards.

Clear vision panels will prevent upper windows from opening
This will be the case in some models. With regard to the effect on cab temperature, most new HGVs have air-conditioning fitted as standard for climate control. With regard to manoeuvring or reversing and the ability of the driver to hear a banksman, this would be considered and assessed further should this proposal be taken forward.

Clear vision panels – safety benefits
The area to the near front side is where cyclists are likely to wait at a left turn – despite the limited view an additional window panel would offer, it reduces the blind spot in this high risk location. We have commissioned a project to define, for legislators, manufacturers and operators, objectively measurable and legally defensible vision standards for lorry cabs according to a direct field of view of the areas of greatest risk. This study will quantify the improvement in vision that these additional windows provide, in comparison with other cab designs and features. In addition to this study to define direct vision standards, we have also commissioned a study, to be completed this year, to identify the benefits of direct vision design features such as this vision panel.

Clear vision panels – distraction
This proposal to fit additional window panels aims to increase road users’ opportunity to make direct eye contact, something the Highway Code advises. The blind spot checks a driver makes are really only likely to be conducted when moving off at lights, changing lanes or turning left. The checks can also be conducted in conjunction when the driver does normal nearside mirror checks. To help us understand whether these panels will be a distraction, we have commissioned a live trial and evaluation of more direct vision lorries, some of which have these windows. The trial aims to demonstrate the operational capability and industry acceptance of HGVs with improved direct vision. The results of this trial are due in October 2016.
The study to identify the benefits of direct vision will provide evidence as to whether it reduces the cognitive workload compared to the use of mirrors and/or a camera system. This will be complete in October 2016.

**The effect of retrofitted window panels on cabs’ structural integrity and driver safety**
This would have to be investigated further. The door is hinged and sits within the door frame, which may support in some way the A and B cab pillars. Some manufacturers, such as Volvo, Iveco and Renault, already add these windows. The design of the retrofit windows that we are aware of has been careful to consider any impact on structural integrity – they are within the ‘skin’ of the door and not cut into the structure of the door. Some use safety glass which is likely tougher than what it replaces. The security implications of fitting these windows to particular vehicle models, such as cash-in-transit vehicles, and compliance with Construction and Use Regulations would be identified as part of an integrated impact assessment should this proposal be taken to the next stage.

**Differential charging for lorries with vision panels as part of the Congestion Charge or Low Emission Zone schemes**
A phased approach like this is one option to consider if this proposal is taken forward, and would be part of a further consultation.

**Ban on lorries without vision panels at all times or at determined times of day**
This option would require further assessment of the safety, economic and environmental impacts, including on housing and deliveries.

**Vehicle exemptions**
This would be taken into consideration should these proposals be taken to the next stage. Implementation of any measures would involve close working with stakeholder groups, including the industry and Government, and the development of a direct vision standard which is legal and enforceable. There would be careful examination of any likely impacts and further public and stakeholder consultation before any decision on implementation is made.

**Vehicles from outside the UK**
The impact of exemptions for left-side drive vehicles would be taken into consideration should these proposals be taken to the next stage, at which an integrated impact assessment and further consultation would be carried out.

**Alternative solutions for safer lorries**

**Implementing other detection measures such as cameras**
These are already stipulated under TfL work-related road risk contractual clauses and CLOCS schemes and for those that are FORS Silver. This consultation was about a specific proposal to improve direct vision, which is believed to impose less on the driver’s cognitive workload when turning a vehicle, relative to indirect vision solutions such as mirrors and camera systems, and improve communication between the driver and other road users. As discussed above, we have commissioned a study to define direct vision standards, which will provide evidence as to whether direct vision reduces the cognitive workload compared to indirect vision, to be complete in 2016.
Implementing alternative direct vision solutions

These are being used currently by a number of operators within London. Lorries like these, that offer maximum direct vision, are representative of the vehicle we are keen to see dominate the heavy goods fleet in London, and we aim to reach that goal through our Safer Trucks Programme. This programme is accelerating the development, supply and wider uptake of heavy goods vehicles (HGV) suitable for urban operations with safety equipment fitted as standard and improved direct vision. Building on the basic safety standards already in place in the Safer Lorry Scheme, it will encourage best in class safety standards through public and private procurement practice and is providing the evidence and technical standards for improved HGV design to support proposed amendments to European regulation. An action plan will be developed to promote vehicles with improved direct vision being the predominant vehicle on London’s streets, to reduce the risk of heavy goods vehicle collisions with vulnerable road users such as cyclists and pedestrians on London’s roads.

Cab heights

TfL has commissioned a study to quantify the field of vision of a range of lorry makes and models, and has concluded that the height of the cab, as well as the position of the driver’s seat, has a great bearing on the extent of the driver’s blind spot. This analysis is feeding into the development of defined direct vision standards and forms part of our Safer Trucks Programme (see above).

Banning lorries in Central London

We have considered the impact of a potential rush-hour lorry ban. The impacts of such a radical policy change are unpredictable and so the findings are indicative rather than certain. Although cycling trips peak in the morning rush hour at the same time as HGV trips, cyclist fatalities that involve HGVs are spread across the day. Collisions with other road users are similarly spread across the day. The review concluded that any benefits from fewer HGVs in the peak (reduced congestion, reduced accidents and improved air quality) would potentially be eroded by:

- A switch to more, smaller vehicles: light goods vehicle traffic would increase considerably as customer demand for goods would still need to be met with an overall increase in road miles during rush hour
- Displacing to other times rather than solving the impact of HGVs: for goods that could not come in alternative vehicles, the problem would simply be displaced to other times of day which are equally busy and as risky from a road safety perspective;
- Substantial costs to business: construction and smaller businesses would be hit especially hard. Construction is dependent on specialist vehicles and typically has little flexibility (e.g. restricted space on site for storage or ability to change site operating hours). Smaller businesses tend to have less flexibility in their operation than chain competitors.

Legislation

National ban

We would work closely with the Department for Transport should these proposals be taken to the next stage.
Vision standards

We are also working with the Government and the European Commission to seek an update to existing European and UK legislation to require enhanced direct vision standards as part of the vehicle type-approval process that lorry manufacturers must follow, so they design these improvements into their vehicles.

CLOCS standard

We will continue to work in partnership with the construction logistics industry to promote the Construction Logistics and Cycle Safety (CLOCS) standard, which has made generated momentum in improving how lorry road risk is managed.

Regulations

Regarding concerns about the proposal’s compliance with vehicular ‘Construction and Use Regulations’, please refer to the above section on cab structural integrity and driver safety. The area in which the new regulations would be applied would be examined if this proposal is taken to the next stage, at which an integrated impact assessment and further consultation would be carried out.

Financial

Costs

We have commissioned a study, due for completion this year, which will provide a cost-benefit analysis of mandating different direct vision standards. We already operate voluntary schemes and use procurement agreements to encourage operators and businesses to employ high vision lorry cabs within their supply chains. We aim to lead by example in this area and employ more of these vehicle types within our supply chain. This should continue to stimulate the market to the point that it is envisaged that, in the near future, high vision lorries will become the industry best-practice norm. Full costs, including the impact of vehicle insurance on operators, would be examined if this proposal is taken to the next stage, as part of a wider integrated impact assessment and a further consultation. A lead-in period before any new measures were introduced would allow time for necessary adjustments.

Safety

Safer cycling behaviour

As one of the most vulnerable road user groups, protecting cyclists from collisions is a key priority for TfL. Improving cyclist behaviour is an important element and we have developed a programme of coordinated activities with our partners, balancing education, training and persuasive marketing with even-handed enforcement activities. Our road safety media campaigns have included clear advice to cyclists on how to position themselves safely when sharing the road with large vehicles, balanced with the message to drivers to look out for cyclists and other vulnerable road users, particularly when turning. We fund London’s local authorities to provide free or heavily subsidised cycling skills training for adults, and
Bikeability cycle training for school children. We also fund and support the MPS and City of London Police’s delivery of the Exchanging Places educational initiative, in which people can sit in the driver’s seat of a lorry to learn about safer positioning and avoiding blind spots. This work to help improve cyclist skills and behaviour will continue in parallel with improving goods vehicle design to prevent further collisions.

**Construction of segregated cycling facilities**

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

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

**Driver education**

All Fleet Operator Recognition Scheme (FORS) approved training, produced by TfL, helps to raise industry standards and support continuous improvement. FORS has developed a variety of training opportunities for both managers and drivers. In order to meet the FORS Standard, members are required to demonstrate that they have plans in place to ensure all drivers and managers undergo approved and progressive training and continued professional development. This includes induction training, compliance and vulnerable road user training, as well as remedial and refresher training to ensure skills are fully embedded. Last year alone we trained over 4,000 drivers on Safe Urban Driving, Staying Legal and Van Smart Driver Certificate of Professional Competence training courses, with another 4,500 planned for this financial year. We are organising 40 FORS Practitioner best practice workshops to train transport managers on vulnerable road user safety. We are supporting the Driver and Vehicle Standards Agency in their delivery of safety training workshops for freight and fleet operators.

We fund and support the MPS Commercial Vehicle Unit, Industrial HGV Task Force and the City of London Commercial Vehicle Unit to engage with drivers and operators, and enforce the law with regard to safe driving and roadworthy vehicles. We are also part of the new London Freight Enforcement Partnership – along with the Driver and Vehicle Standards Agency, the MPS and City of London Police – which allows better sharing of information, better targeting of resources and a more co-ordinated approach to freight education and enforcement.

**Long-term planning**

See above re. the Safer Trucks Programme.

**Consultation**

**Pre-engagement with statutory bodies**
This consultation forms the first stage of engagement with statutory bodies including London boroughs about further ways to improve lorry safety, following initial discussion with London Councils. We will undertake further consultation as our proposals are further developed. Implementation of any measures would involve close working with stakeholder groups, including the industry and Government, and the development of a direct vision standard which is legal and enforceable. There would be careful examination of any likely impacts and further public and stakeholder consultation before any decision on implementation is made.

**Other**

**Use of the river for freight movement**

As part of our freight strategy, we actively encourage businesses to use the most appropriate mode of transport for every journey, including river transport.