



ACTION ON LORRY DANGER

Direct Vision Consultation Questions

Part 1

We are responding as a group of organisations representing the viewpoints of cyclists and pedestrians in London and elsewhere in the UK.

Question 1

We strongly agree (that the DVS has the potential to improve HGV and vulnerable user safety)

We have carefully studied the extensive technical assessments carried out by and on behalf of TfL. We accept and respect these assessments as professionally and rigorously compiled. Our response is based on (a) acceptance of these assessments; (b) the need for safety of people who walk and cycle on London's streets; (c) our close personal knowledge of the experiences of victims and their families; and (d) the pressing need to enable modal shift to walking and cycling in London e.g. to address air pollution, reduce overcrowding on London's transport system.

Question 2

We strongly agree (to banning zero DVS rated HGVs by January 2020)

It is urgent to introduce prohibitions on zero rated DVS vehicles. Each year of delay will cost the lives and serious injuries of victims and continue to intimidate Londoners. The knowledge of deaths and injuries inflicted on pedestrians and cyclists deters people from cycling and walking, and is thus in conflict with the Mayor's transport policies to increase use of these modes.

We note the suggestion on page 15 of the Consultation supporting document that equipment such as cameras and sensors (plus, we would add, under-run protection to address the particular issues associated with N3G lorries), might have a role to play in temporarily upgrading zero star or low rated DVS HGVs. However we think that this suggestion would 'muddy the water' with respect to the proposed rating scale, and create confusion. We could however accept a proposal that it would be acceptable, under strict mitigating conditions, for a temporary exemption. In other words, we can see that there may be a case for justifying a short deferment on strict conditions, including adherence to CloCS and FORS Silver standards by operators, in the ban for HGVs with high quality cameras and sensors.

Question 3

We strongly agree (to allowing only three star and above DVS rated HGVs by 2024)

The research clearly justifies such restrictions. We suggest a more ambitious target of five star rated lorries to be the norm by 2024. The seven years until 2024 should be used by TfL to:

- (1) Engage with lorry manufacturers to extend and improve their range of DV HGVs;
- (2) Engage with operators to upgrade their fleets to good DV star rating;

- (3) Lead a programme with the waste industry to convert waste sites so that off-road HGVs are no longer needed there, thus forcing waste operators to adjust their ways of working;
- (4) Engage with planning authorities to require developers, as conditions of planning consents for development, to (a) use only good starred DV HGVs in their supply chains; and (b) ensure that building sites are suitable for on-road HGVs;
- (5) Engage with councils to work with the freight industry to reduce the need for HGVs on London's streets by establishing consolidation centres;
- (6) Lead a coordinated programme of developing river and canal goods transport; and
- (7) Lead a coordinated programme of developing rail freight in Greater London.

Question 4

Display of DVS star rating on vehicles?

Yes. This may assist enforcement and public reassurance. Additionally, we suggest that the DVS star rating be displayed on vehicles at point of sale in order to provide confidence to operators when buying a vehicle. Whilst stickers are useful for raising public awareness, enforcement should be delivered through ANPR.

Question 5

Do you have any other comments about our current plans to use the Direct Vision Standard to improve HGV safety?

We very much welcome TfL's commissioning and use of evidence to inform its proposals for reducing lorry danger via the introduction of DVS star ratings for HGVs. We welcome the Mayor's proposal to use GLA procurement power to influence road safety in London. TfL's existing initiative on Work-Related Road Risk (WRRR) requirements has been an effective model for this since February 2012 and we ask the Mayor to encourage other public sector organisations such as London Boroughs, Network Rail, the National Health Service, Highways England, and the Ministry of Defence to follow this lead. We emphasise that, additionally, good quality law enforcement will be required to effectively address lorry danger.

Part 2a: The Direct Vision Standard – All interested respondents

Question 6

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

We think 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.

*Action on Lorry Danger
15 March 2017*