



Consultation response by Cycling UK
On
Transport for London's proposed Direct Vision Standards
for Heavy Goods Vehicles

Introduction

1. Cycling UK (formerly known as CTC), the national cycling charity, was founded in 1878, and has 65,000 members and supporters. Our central mission is to make cycling a safe, accessible, enjoyable and 'normal' activity for people of all ages and abilities. Our interests cover cycling both as a form of day-to-day transport and as a leisure activity, which can deliver health, economic, environmental, safety and quality of life benefits both for individuals and society.
2. We represent the interests of current and would-be cyclists on public policy matters, and have campaigned on lorry safety issues both nationally through our Action on Lorries Campaign, and in London specifically, where we are members of the Action on Lorry Danger (ALD) group. We are also members of CLoCS, the London Freight Enforcement Partnership Stakeholder Advisory Group and the London Cycle Safety Working Group.
3. Last year, Cycling UK submitted representations to Transport for London (TfL) in response to its previous consultation on improving lorry safety, in the course of which we made submissions in support of a 'roadmap' to direct vision lorries, setting out steps that could be taken to promote the uptake of HGVs with improved driver direct vision. We therefore strongly support the initiatives proposed within this current consultation to adopt a direct vision standard.

4. We would also commend the submissions already made in response to this consultation by ALD.

Response to consultation questions

Question 1: To what extent do you agree that adopting a Direct Vision Standard (DVS) for HGVs (Heavy Goods Vehicles) has the potential to improve HGV and vulnerable road user safety?

5. The research commissioned by TfL supports the conclusions of numerous collision investigations involving HGVs, where pedestrians and cyclists have been either killed or seriously injured (KSI): namely that the HGV drivers' limited field of direct vision – the vehicle's blind spots – has contributed to a significant number of collisions.
6. Whilst it was vital to undertake this in-depth research, the conclusion that eliminating vehicle blind spots would remove a significant contributing factor in many HGV and vulnerable road user (VRU) KSI collisions will not surprise anyone who has considered the unacceptable number of such collisions in recent years, particularly in London.
7. Whilst Cycling UK represent the interests of cyclists and cycling, and as members of ALD campaign and lobby on behalf of all VRU in relation to HGV safety issues, it is important to acknowledge that the implications of these collisions impact beyond the victims and their families. When a VRU is killed or seriously injured in a HGV collision where the lorry blind spot is a factor, that also has serious implications for both the driver involved and the operator.
8. Over recent years, the preferred solution has been to reduce the extent of HGV blind spots by adding additional mirrors to improve drivers' indirect vision, such that drivers now have six mirrors, with many operators also fitting camera and sensor equipment within lorry cabs.
9. Again, the research clearly shows what most people would expect: that drivers react more quickly when they can see VRU rather than when having to rely upon ever more complex mirror and sensor systems. Bluntly, improving drivers' direct vision is preferable to improving indirect vision through additional mirrors and sensors.
10. Given the findings of TfL's evidence based research concerning the benefits of improved direct vision, it makes sense for the issue of vehicle blind spots to move its focus towards improving drivers' 'direct' vision, rather than improving 'indirect' vision. It is therefore axiomatic that there must also be a direct vision standard (DVS), otherwise it will be impossible to assess, compare or regulate the direct vision afforded to drivers of different HGVs.

11. Cycling UK accepts that there are legitimate arguments as to what the standards should be, how and over what timescale they should be implemented, and how they should be regulated. The evidence is however clear and uncontroversial: HGV blind spots are a significant contributing factor to VRU KSI collisions; and, improving drivers' direct vision is a better way of addressing this than measures to improve indirect vision. As there is currently no DVS for HGVs, the first step in addressing this crucial safety issue has to be adopting DVS. Cycling UK strongly agree with this proposal.

Question 2: 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?

12. At page 3 of the consultation document it is suggested that the largest and highest vehicles, including some 'off-road' construction vehicles and long-haul articulated cabs designed to operate on motorways, are most likely to receive lower or zero star ratings. When considering the timescale for banning those vehicles the following facts are relevant:
 - a. The basic design of these vehicles has not changed since the 1970s;
 - b. These vehicles were not designed for use in busy urban environments;
 - c. The nature of the urban environments within which some of these vehicles are operating – particularly in London – have changed dramatically since the 1970s;
 - d. It is the N3G vehicles designed for off-road use which are disproportionately involved in VRU KSI collisions;
 - e. Off-road N3G vehicles, with higher ground clearance in order to enter landfill sites, construction sites and quarries, operate largely on-road in London, with only a tiny percentage of their journeys undertaken off-road;
 - f. Work is already underway (and needs to be continued), to improve the quality of the roads within construction and other sites, to avoid the need for an N3G vehicle to access those sites.
13. Cycling UK is aware that some manufacturers, operators and HGV representative groups have questioned the timescale for banning zero rated vehicles by January 2020. Whilst the Mayor announced his intention to introduce the DVS back in September 2016, that was far from the first time that banning certain HGVs from London's roads has been raised as a distinct possibility. Operators should have been aware, and have effectively been on notice, that the use of certain HGVs which were not designed for urban use was a substantial concern, and that consideration might have to be given to restricting their use in certain areas.
14. Delaying the timescale for banning zero rated HGVs beyond January 2020 will have unacceptable consequences in terms of VRU casualties from HGV collisions. That would be

inconsistent with both the Mayor's transport policies to increase cycling and walking, and the Heathy Streets initiative.

15. Cycling UK therefore submits that requiring operators to adjust their vehicle fleets, operations or working practices by January 2020 is a reasonable and proportionate response, and strongly supports the proposal to ban zero rated HGVs by that date.

Question 3: To what extent do you agree that only HGVs with 'good' direct visibility or 'three star' DVS rating should be allowed on London's streets by 2024?

16. The research clearly supports this restriction, however, Cycling UK is aware that some will argue that seven years is insufficient time to take decisions regarding fleet purchase, alter decisions already made, or indeed to sell vehicles already purchased or which they have committed to purchase, without sustaining losses as the value of those vehicles depreciates.
17. Cycling UK submits that the concerns envisaged at para 12 are all manageable. Operators would have seven years to adjust their fleet, working practices and operations, and a market for vehicles which operators might seek to sell will still exist in other parts of the country. It is important to note that it is not being suggested that the HGVs which would be banned under these proposals are unsafe or dangerous vehicles, merely that they are unsuitable for urban use around VRU. There will therefore be a market for vehicles which are no longer permitted within London, for purchase and use in more appropriate environments outside London.
18. Cycling UK therefore strongly supports the proposal to allow only three star and above DVS rated vehicles by 2024. Additionally, we would submit that to encourage five star rated HGVs as the norm by 2024, the intervening seven-year period could be used to:
 - a. Engage with lorry manufacturers to extend and improve their range of direct vision (DV) HGVs;
 - b. Engage with operators to upgrade their fleets to a better DV star rating;
 - c. Lead a programme with the waste industry to improve waste sites to minimise the need for off-road HGVs on-site;
 - d. Engage with planning authorities to require developers, as conditions of planning consent for development, to (i) use only higher rated DV HGVs in their supply chains, and (ii) ensure that building sites are suitable for on-road specification HGVs;
 - e. Engage with the London Borough Councils (the Councils) to work with the freight industry to reduce the need for HGVs on London's roads by establishing consolidation centres;
 - f. Lead a coordinated programme of developing river and canal goods transport;
 - g. Lead a coordinated programme of developing rail freight in London.

Question 4: Do you think that the DVS star rating should be displayed on the vehicle?

19. Cycling UK strongly agrees with this, as it should help develop public re-assurance and assist with enforcement.

Question 5: Do you have any other comments about our current plans to use the DVS to improve HGV safety?

20. In our response to TfL's consultation on improving lorry safety last year we proposed a 'roadmap' to direct vision lorries, setting out a number of steps which could be implemented to support the replacement of lorries which were unsuitable for urban use with lorries with improved direct vision. Whilst we wholeheartedly support TfL's proposals regarding the introduction of DVS star ratings for HGVs, we would also encourage TfL to consider the proposals set out within that consultation response which included the requirement:
 - a. For TfL and all 33 Councils to express a preference for HGVs with higher DVS star ratings in all planning applications and publicly funded contracts;
 - b. For TfL and the Councils to make a specific DVS star rating a contractual requirement by 2020.

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?

1. Cycling UK 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.

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Cycling UK**

