

Response ID ANON-QJG2-2J7E-C

Submitted to **Have your say on the introduction of a Heavy Goods Vehicles Safety Standard Permit as part of the Direct Vision Standard to reduce road danger**

Submitted on 2018-01-21 11:14:07

Our proposals - Direct Vision Standard and Rating Boundaries (see Section 4 of the Consultation Document)

1 To what extent do you agree or disagree that the amount a HGV driver can directly see through the cab's windows plays a role in collisions with vulnerable road users?

Strongly agree

2 To what extent do you agree or disagree that the amount a driver can directly see should be improved to reduce HGV road risk?

Strongly agree

3 To what extent to you agree or disagree with the proposed star rating boundaries for vehicles under the DVS scheme?

Strongly agree

4 Do you have any comments on the DVS or how the ratings boundaries have been set?

Comments:

Pleased that ratings are based on robust research. Research findings underline the urgent need for use of other safety features and for operators to be pushed to dispose of non-compliance HGVs.

Our proposals - Proposal to introduce an HGV Safety Standard Permit Scheme (See sections 5 and 6 of the Consultation Document)

5 To what extent do you agree with the proposals to introduce the proposed HGV safety standard permit scheme?

Strongly agree

6 To what extent do you agree with the proposals to introduce the proposed HGV Safety Standard Permit scheme even if it may make it more expensive for businesses to operate HGVs in London?

Strongly agree

7 To what extent do you agree or disagree that a DVS rating of one star should be set in 2020 as the minimum acceptable standard for HGVs to operate in London without further safety measures?

Strongly agree

8 To what extent do you agree or disagree that a DVS rating of three stars should be set in 2024 as the minimum acceptable standard for HGVs to operate in London without further safety measures?

Strongly agree

9 Should consideration be given to combining the Direct Vision Standard and 'safe system' so that the star ratings zero (poor) to five (excellent) relate to the overall safety of the vehicle?

No, the Direct Vision Standard star ratings should remain separate and focus on vision only

10 To what extent do you agree or disagree that HGVs not meeting the above minimum star requirements should be required to operate further safety measures to increase their safety?

Strongly agree

11 To what extent do you agree or disagree that such HGVs should be banned from operating in London if unable or unwilling to do so?

Strongly agree

12 To what extent do you agree with the principles and way we propose to approach setting the 'safe system' of safety measures for HGVs failing to meet the minimum DVS star requirements?

Strongly agree

13 To what extent do you agree with the proposed measures (direct vision improvements, indirect vision systems, driver training, audible warnings etc) to be considered within the safe system?

Strongly agree

14 Are there any more components that you suggest should be included within a safe system?

Comments:

Main point we would make would be that a *system-wide* approach is required, so all elements of system work towards reducing the danger that lorries pose to others on London's roads. This could include operators' membership of industry bodies such as CLoCS and FORS. Drivers' attitudes towards pedestrians and cyclists should also be a consideration, in order to maximise the safety benefits of this scheme.

15 Which body or organisation would best represent your views in identifying which measures would meet the 'safe system'?

Vulnerable road user campaign groups

Other:

16 Do you support our proposal to enforce the DVS Scheme through a camera system that will read number plates and check against a list of permits that have been issued?

Strongly agree

17 Do you think that Direct Vision alone is enough or should it be considered as part of a wider package of measures to reduce HGV road danger?

No DVS as part of a wider package of measures

18 Do you have any further views on the proposals or suggestions for how the permit scheme should operate and be enforced to impose minimum safety requirements in 2020 and 2024?

Comments:

Effective enforcement is essential and needs to be properly resourced. Licences of operators need to entail proper compliance, with consequences for operators found to be cheating. All operators need to expect to be checked periodically. The detailed workings of the permit scheme need to be fully worked out e.g. who 'owns' permit when a lorry is sold to another operator.

Optional technical questions (See section 6 of the Consultation Document)

19 We propose to implement the DVS Scheme by amending the London Lorry Control Scheme (LLCS) Traffic Regulation Order (TRO). This will enable civil enforcement London-wide by the issue of PCNs to operators/ hauliers (£550) and drivers (£130). Do you agree with this approach?

Yes

20 To receive a permit to operate in London, the "safe system" of the HGV will need to be tested and certified at a network of national testing centres. What do you consider the most important factors for TfL to consider when setting up this network? Tick as many as apply.

Cost to operator, Time taken to complete test, Testing available across UK and Europe, Standards being tested are consistent with other tests

Other factors:

21 We are producing an online 'look up' tool which produces DVS ratings once the height of the vehicle has been accurately measured. This tool will be used to 'look up' DVS ratings which will form part of the testing and certification. Vehicles will be added to the tool when they have been modelled. Do you agree with this approach?

Yes

22 Do you have any other comments on the DVS online 'look up' tool?

Comments:

About you

23 What is your name?

Name:

Jeremy Leach

24 What is your email address?

Email:

jeremyleach@posteo.net

25 Please provide us with your postcode?

Postcode:

SE17 3EQ

26 I am responding as (please tick all boxes that apply):

As a community/voluntary group

Other:

27 If responding on behalf of an organisation, business or campaign group, please provide us with the name:

Organisation:

London Living Streets

28 How did you find out about this consultation?

Received an email from TfL

Other:

29 What do you think about the quality of this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and questionnaire etc.)?

Very good

Do you have any further comments about the quality of the consultation material?:

Equality Monitoring

30 Gender:

Male

31 Ethnic Group:

White – British

32 Age:

56-60

33 Sexual Orientation:

Heterosexual

34 Religious faith:

Prefer not to say

35 Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? (Please include problems related to old age)

No