



accidents don't have to happen

# Making London's lorries safer- proposals for changes to the HGV Safety Permit Scheme

RoSPA's response to Transport for London (TfL)'s  
consultation

April 2023



Response to Transport for London (TfL)'s consultation: Making London's lorries safer- proposals for changes to the HGV Safety Permit Scheme

## Introduction

This is the response of The Royal Society for the Prevention of Accidents (RoSPA) to Transport for London (TfL)'s consultation on making London's lorries safer through proposals for changes to the HGV Permit Scheme. It has been produced following consultation with RoSPA's National Road Safety Committee. We have no objection to our response being reproduced or attributed.

The consultation seeks views on how Transport for London can further reduce the risk heavy goods vehicles (HGVs) over 12 tonnes pose to vulnerable road users such as people walking and cycling.



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**Please let us know any comments you have on our proposals for the progressive safe system and changes to the HGV safety permit scheme application.**

**When commenting please:**

- a) Let us know your views on the effectiveness of the proposals for improving vehicle safety**
- b) Let us know if you have any suggestions for further improvements or alternative solutions**
- c) Let us know if there are any impacts we have not identified and what impacts the changes may have on you or your organisation**
- d) Let us know your views on whether the areas of the HGV safety permit scheme application process we are reviewing will improve the user experience**
- e) Let us know your views on our proposal to review the HGV safety permit scheme in 2028**

### **RoSPA response**

RoSPA strongly agrees with TfL's proposals for changes to the HGV permit scheme, given that historically, heavy goods vehicles (HGVs) have been disproportionately involved in more fatal collisions with pedestrians, cyclists and motorcyclists (deemed vulnerable road users) than other motor vehicles.

As stated in the consultation papers, between 2015 and 2017, an HGV was involved in 63 per cent of collisions in which someone was killed while cycling and 25 per cent of fatal collisions with pedestrians. The Direct Vision Standard is designed to improve drivers' direct vision through the cab windows of HGVs by minimising HGV blind spots. These blind spots can lead to collisions resulting in tragic deaths and serious, life-changing injuries. Under the scheme, operators of HGVs must have a permit for any vehicles entering and operating in Greater London. A permit will automatically be granted upon application if the vehicle meets the minimum DVS star rating. Where vehicles do not meet the minimum standard, operators need to make them safer by fitting a 'Safe System'. This is a series of vehicle safety measures which are designed to reduce the risks that HGVs present to vulnerable road users.

Fatal collisions involving HGVs and vulnerable road users where vision was a contributory factor have halved since 2018, down from 12 to six, with zero star rated vehicles being involved in four of these six collisions. The overall number of serious injuries involving HGVs has also fallen from 39 in 2018 to 17 in 2021, though these figures need to be treated with caution to some extent due to the changes in traffic levels during the Covid-19 pandemic. Although collisions involving HGVs and vulnerable road users have been falling, HGVs accounted for just three per cent of the overall miles driven in London 2019-21 yet were involved in over half of fatal collisions involving people cycling and 11 per cent of those involving people walking.

Although the first phase of the (DVS) has seen a reduction in the number of collisions in which direct vision was deemed a contributory factor, this trend is now beginning to flatline and it is vital that we do not become complacent. To continue to see a reduction in the number of collisions, and to reach ambitious Vision Zero targets, RoSPA would support the proposals to raise the standard required for HGVs operating in Greater London. This should continue to be updated and revised as new technologies become more readily available on new vehicles and for retrofit to the existing fleet.



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RoSPA is also strongly supportive of the proposals given their alignment with the changes to the Highway Code in 2022, which involved a new rule creating a hierarchy of road users. This is a concept that places those road users most at risk in the event of a collision at the top of the hierarchy. The hierarchy does not remove the need for everyone to behave responsibly. The road users most likely to be injured in the event of a collision are pedestrians, cyclists, horse riders and motorcyclists, with children, older adults and disabled people being more at risk. Those in charge of vehicles that can cause the greatest harm in the event of a collision bear the greatest responsibility to take care and reduce the danger they pose to others. This principle applies most strongly to drivers of large goods and passenger vehicles, vans/minibuses, cars/taxis and motorcycles. The main benefits of the proposals come from reduced road fatalities and serious injuries, plus increased levels of walking and cycling as a result of people feeling safer on the roads.

RoSPA is also supportive of the proposals for the new requirements of the DVS scheme, building upon the 2019 requirements to ensure that operators in London are using the latest safety technology and equipment. We believe that it is necessary to move the minimum DVS rating for vehicles from one to three stars and for those with a two star rating or below to be required to fit the progressive safe system, providing evidence of this, to obtain a permit.

RoSPA agrees that camera monitoring systems fitted on vehicles must eliminate any remaining blind spots at the nearside. As the paper states, evidence tells us that there is a significant potential for blind spot elimination to prevent collisions where direct vision is a contributory factor. Removing these blind spots is likely to have a significant effect on reducing these common collision types. We also support proposals requiring sensors to ensure full coverage down the nearside of all vehicles to detect vulnerable road users accurately, which do not falsely activate in proximity to roadside furniture. These sensors are vital, as they inform the driver when pedestrians and cyclists are in close proximity to the vehicle. The paper highlights that most fatal collisions where vision is a contributory factor occur at low speeds in urban areas as a result of poor direct and indirect vision from the cab. These sensors can play an important part in alerting the driver that pedestrians and cyclists are nearby, even when they cannot be easily seen and could help to contribute to a reduction in the number of left turn collisions involving pedestrians and cyclists.

RoSPA would support requiring that Moving Off Information Systems (MOIS) **must** be fitted to the front of a vehicle to prevent collisions at the frontal blind spot zone when a vehicle moves off from rest. As the paper states, HGVs rated zero, one and two stars have a significant blind spot at the front of the vehicle. Research has found that the majority of people under 1.65m (five feet -five inches) could not be seen by the driver if they were situated two metres from the front of the vehicle. These systems can help to alert drivers.

Finally, we agree with the proposal for audible warning systems to be fitted to all HGVs, including left-hand drive vehicles. These audible warning systems play an important part in keeping road users safe by warning pedestrians and cyclists of the intention to make a manoeuvre. They have been proven to be an effective tool in reducing collisions where a vehicle is turning left. This requirement will ensure a safe and consistent standard is applied to all vehicles, regardless of their country of registration.

Although these proposals are likely to incur costs for a considerable number of operators and hauliers, it is encouraging to see that the average daily scheme compliance for the DVS is very high, with more than 94 per cent



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of HGVs in London operating with a safety permit. Operators and hauliers have also reported that they are building DVS requirements into their future purchasing decisions.

We also believe that the impact assessment demonstrates that the investment of operators and hauliers in safer vehicles is vital, given the significant positive benefit the scheme is likely to have on road safety. The first phase of DVS has seen a reduction in the number of collisions where vision was attributed as a contributory factor. Almost 200,000 permits have been granted and 112,000 HGVs have been fitted with equipment to protect cyclists and pedestrians. The further tightening of the scheme is likely to have similar significant positive road safety impacts.

The paper states that there is the intention to review the DVS scheme in 2028. RoSPA would welcome a review at this point as technology is constantly emerging, and to reduce the number of collisions, it is vital that fleets take advantage of new safety technologies. Hopefully, some systems, such as intelligent speed adaption, will be more readily available for retrofit and can be considered in the next phase.

**Please select the which of the following respondent types best describes you:**

**RoSPA response**

A transport related interest group or charity.

**Can you please confirm if you are responding as an individual or as an official representative of an organisation (e.g. interest group, charity or trade body).**

**RoSPA response**

As an official representative of an organisation.

**If you are responding as an official representative of an organisation then please provide your organisation name below.**

**RoSPA response**

The Royal Society for the Prevention of Accidents (RoSPA).

**How did you hear about this consultation? Please select the main way by which you heard.**



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**RoSPA response**

Social media.

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

**RoSPA response**

	Very good	Good	Adequate	Poor	Very poor	Not applicable
Website structure and ease of finding what you needed	X					
Written information	X					
Online survey format	X					
Website accessibility	X					

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

**RoSPA response**

RoSPA has no further comments to make on the consultation process, other than to thank TfL for the opportunity to comment. We have no objection to our response being reproduced or attributed.

