

DVS Consultation – Member Briefing

17 March 2023

Introduction

Transport for London is consulting on changes they propose to make to the Direct Vision Standard scheme from October 2024. Under the proposals:

- The requirements of the HGV Safety Permit Scheme will increase from one star to three stars.
- A Progressive Safe System is proposed for vehicles not meeting Safety Permit Scheme requirements

Specific changes being proposed are:

- 1) updating guidance on the use of mirrors and camera monitoring systems to allow the use of both systems
- 2) requiring that camera monitoring systems fitted on vehicles must eliminate any remaining blind spots at the nearside
- 3) requiring that sensors must ensure full coverage down the nearside of all vehicles to detect vulnerable road users. They must not activate in relation to roadside furniture or stationary vehicles
- 4) requiring that Moving Off Information Systems 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
- 5) requiring that audio warnings must be fitted to all vehicles including those with left hand drive to ensure all vehicles have the ability to warn of an intended manoeuvre

There are no proposals to change warning signage or sideguard requirements.

TfL also intend to improve their administration processes to obtain DVS permits. This includes:

- offering the ability to check the permit status via an online tool
- providing additional ways of improving and automating the process
- linking the evidence process with FORS requirements

The consultation closes on Monday 3 April and can be found [here](#):

Here follows a form of words for members to use when responding to the consultation. Please also feel free to add any additional views or evidence as you see fit. We have put in *italicised brackets* additional issues and details that you may wish to add into your response.

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Form of words

Road safety is everybody's responsibility. {INSERT NAME OF YOUR COMPANY} is committed to promoting the highest safety standards in {INSERT SECTOR WITHIN WHICH YOU OPERATE – e.g. *general haulage, construction, waste management etc.*}, though it is important that all road users play their part.

Whilst we are willing to invest in technologies where available that assist the safe operation of lorries, this should be done in tandem with awareness programmes that educate other road users such as pedestrians and cyclists on how to use shared road space safely.

In response to the questions Transport for London are asking, we respond as follows:

- **Let us know your views on the effectiveness of the proposals for improving vehicle safety**

It is difficult to answer this question as the consultation documents do not contain specifications setting out how the new changes will be met. Once the specifications have been published, it will then be possible to judge whether equipment is available in sufficient quantities to meet the new requirements.

We understand from the Road Haulage Association that, in the absence of these specifications, TfL are asking whether operators are content with the principles established by the new requirements. As safety is everybody's priority, we confirm that we are content. However, solutions to these principles must be practicable and available.

{If you wish to expand further on this question, you may wish to provide text that answers the following questions:

- *in your view, is the technology available to allow the following to be installed to your HGV fleet:*
 - a mirror/camera monitoring system that allows all remaining blind spots to be eliminated on the nearside?*
 - sensors that detect vulnerable road users but not street furniture or stationary vehicles down the nearside of:*
 - rigids?*
 - articulated lorries?*
 - Moving Off Information Systems that can be fitted to the front of the vehicle?*
 - audio warning systems that warn of an intended manoeuvre?*
- *If you believe the equipment is not available, by what date do you think the relevant equipment could be available?*
- *In your view, could you retrofit the required equipment without having to scrap existing systems you have installed?}*
- **Let us know if you have any suggestions for further improvements or alternative solutions**

It is imperative that Transport for London invests in programmes to educate other road users such as pedestrians and cyclists on how to use the roads safely.

- **Let us know if there are any impacts we have not identified and what impacts the changes may have on you or your organisation.**

There are three impacts that TfL have not identified.

First, the timescales for ensuring compliance by October 2024 look unachievable. We understand that TfL plan to publish the necessary specifications during the “summer of 2023”. Assuming publication by no later than September 2023, this gives operators 13 months to source and fit the required equipment. When TfL have issued 191,000 permits to lorries entering London, this would mean nearly 15,000 lorries per month would potentially need to have equipment fitted.

The absence of the specifications therefore raises questions on whether:

- the required equipment is available in sufficient quantities;
- there are sufficient technicians to fit the equipment. The Institute of Motor Industry (IMI) published a report in July 2022 highlighting an increasing shortage of technicians; *{Please flag here whether you are experiencing technician shortages}*
- efficient operations can be maintained if large quantities of lorries are taken off the road for the equipment to be fitted. *{Please feel free to add here how you would seek to manage the fitting of required equipment}*

Secondly, it is not possible to judge the extent of any retrofitting to existing kits. TfL must make clear how existing kits can comply with the new standards, with any retrofitting limited to minor modifications to make existing kits compliant.

Thirdly, TfL must make sure that it does not create a supply shortage of required equipment that causes price inflation. This is so that small businesses can ensure they can comply with the new requirements fairly and equally.

- **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.**

Whilst we welcome that TfL plan to provide a facility enabling operators to check their permit's status, TfL must clarify how it will validate that existing kits already fitted on to a lorry meet the new requirements. We need to know the following:

- what evidence do we need to supply?
 - in what format?
 - by what means?
 - how fraudulent applications are spotted and rejected?
 - how missing paperwork relating to existing kits is accommodated?
 - availability of TfL staff to assist with queries and resolve processing problems?
- **Let us know your views on our proposal to review the HGV safety permit scheme in 2028**

We welcome that TfL plan to review the need for the DVS scheme in 2028. The review must be evidence-based and consider safety equipment fitted as standard on new vehicles and the causation of any road casualties.