



22 September, 2014

Transport for London
Barclays Cycle Hire
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Worthing BN11 9PS

Direct Dial: 01494 545706
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Dear Sir or Madam,

Consultation on Safer Lorries

The BVRLA welcomes the opportunity to comment on Transport for London's (TfL) consultation for Safer Lorries.

The BVRLA is pleased that TfL and London Councils have recognised that HGV's not fitted with safety equipment is hazardous. We agree such practices should be stopped across London within the same area as the London Low Emission Zone. In doing so, this will aim to reduce the number pedestrians and cyclists from being injured.

We therefore support the proposals to prohibit HGVs over 3.5 tonnes that are not fitted with the required safety equipment from driving in London. This safety equipment are:

- Side guards
- Class V mirrors
- Class VI

With the proposed scheme intending to allow a number of exemptions as outlined in Appendix A of the proposal.

We suggest that there is a 12 month transitional phase, similar to that carried out during the low emission zone implementation. During this period warning letters could be issued rather than an automatic penalty for traffic contraventions as affected businesses are better informed their obligations to update their vehicles. This will also enable TfL to survey how many vehicles travel through the zone during this period to ensure a robust impact assessment is developed.

We realise that an impact study was completed to assess the need for the change however we believe that it did not realistically evaluate the economic impact or impact on businesses. We believe that TfL should have thoroughly investigated the impact on businesses and how many vehicles/businesses may potentially be affected.

We are keen to continue to work with TfL to ensure that our members, as well as other motorists, all benefit from schemes put in place in London.

We welcome the opportunity to comment on the TfL consultation and hope the relationship between TfL and the Association will continue to add value in the continued development of London.

British Vehicle Rental and Leasing Association

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Transport for London

August 2014

Yours faithfully

A handwritten signature in black ink, appearing to read 'Jay Parmar', is written over a light grey circular stamp.

Jay Parmar

Director of Policy & Membership

Bona-fides BVRLA, the industry and its members

- Established in 1967, the British Vehicle Rental and Leasing Association is the UK trade body for companies engaged in the rental and leasing of cars and commercial vehicles. Its members operate a combined fleet of 3.4 million cars, vans and trucks.
- BVRLA members buy nearly half of all new vehicles sold in the UK, supporting around 184,000 jobs and contributing more than £14bn to the economy each year.
- By consulting with government and maintaining industry standards, the BVRLA helps its members deliver safe, sustainable and affordable road transport to millions of consumers and businesses. For more information, visit www.bvrla.co.uk.