



4 March, 2016

TfL Consultations
Freepost

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Dear Sirs,

Further improving lorry safety in London

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

When the safer lorry scheme was introduced the BVRLA was supportive of its aims and objectives and the requirement for vehicles to be fitted with side-guards and additional mirrors as there were proven safety benefits to the implementation of these additional safety features.

We note the current proposal from TfL is to fit vision panels in passenger-side doors, wherever they can be fitted, as a mandatory standard for lorries operating in London. We do not support the principle of this proposal as we believe that it will not deliver the road safety benefits and reduce the driver blind spots that contribute to accidents.

As a broader principle we fundamentally disagree with cities introducing local vehicle design specific road safety measures. It is a matter for national government through the type approval regime and construction and use regulations. If all the major cities started introducing their own vehicle modifications HGV owners and operators would be constantly modifying vehicles depending on where the vehicle was being used. This would see costs spiralling for HGV owners and operators, costs which would end up being passed on to Londoners who would have to pay more to get their goods. If TfL believe that the current legislation is not fit for purpose we would recommend lobbying central government for changes at a national level.

The vision panel could easily be blocked by a passenger in the vehicle or the driver's belongings which are carried in the cab. We would suggest that TfL should investigate further electronic devices which give warnings of cyclists' and pedestrians' proximity and/or devices which show a 360-degree view around the vehicle, as if from above. Our members have advised us that some customers are already using this technology and getting positive feedback from drivers. We believe this technology is far more likely to deliver the road safety benefits that TfL and the Mayor would like to see in London.

We note the costs stated in the consultation are around £1,000 to £1,500 which we agree with, however, added to these costs are the time for the vehicle to be off the road and any replacement vehicle needed to cover while the vehicle is being adapted so an additional £300 should be included on the costs.

British Vehicle Rental and Leasing Association

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Transport for London

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With regards to the options for enforcement we note that the consultation is suggesting changes to the congestion charge or London-wide Low Emission Zone or restricting non-compliant vehicles. We believe that both approaches would be problematic as it would be very difficult to identify through camera enforcement which vehicles can be fitted with the vision panel. Our recommendation would be that if TfL continue to push for vision panels to be fitted then there should be a penalty charge notice regime for non-compliance rather than altering the objectives of the congestion charge scheme or low emission zone.

We hope our comments add value to the work TfL is carrying out to improve road safety in London and would be happy to further contribute to any debate on this subject.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jay Parmar', is written in a cursive style.

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 4.5 million cars, vans and trucks.
- BVRLA members buy nearly 50% of all new vehicles sold in the UK, an estimated 1 million vehicles (including 308,000 UK-made vehicles) per annum.
- Collectively, members of the BVRLA support around 317,000 jobs and contribute over £24.9 billion to the UK economy each year.
- Through its members and their customers, the BVRLA represents the interests of over 2 million business car drivers and 10 million people per year who choose to rent a vehicle.
- As well as informing the Government and policy makers on issues affecting the sector, the BVRLA regulates the industry through a mandatory code of conduct, helping its members deliver safe, sustainable and affordable road transport to millions of consumers and businesses. For more information, please visit www.bvrla.co.uk.