



15 February, 2019

Direct Dial: 01494 545706

Email: jay@bvrla.co.uk

Dear Sir or Madam,

Re: Direct Vision Standard: Phase 2b HGV Safety Permit Scheme

The BVRLA welcomes this additional consultation and the opportunity to contribute our members' views in working toward improving road safety. We have worked with other trade associations on this issue since 2017 and would broadly share several of the same concerns set out by the Road Haulage Association, the Freight Transport Association and the SMMT.

We are happy to meet with you to discuss the revised proposals in more detail, or also arrange a meeting/call with a group of our members to hear their concerns.

As the trade association representing over 980+ members who operate over 5 million vehicles (including 124,800 Heavy Goods Vehicles) the BVRLA supports the aims and objectives of the proposed Direct Vision Standard (DVS) and the Mayor's 'Vision-Zero' approach.

We recognise the criticality of improving road safety for users and pedestrians.

However, we remain concerned that the proposed DVS will not be the most effective measure to reduce accidents from vehicles passing through London. The evidence set out by TfL also indicates that it is not clear the DVS will lead to the achievement of the road safety goals that the scheme is meant to secure and other solutions may be more effective.

Local standard setting is creating complexity and uncertainty

The BVRLA believes that national and international standards for vehicle safety are required. We do not believe more regulation from multiple sources is fair or in the interests of the people and businesses of the UK. The BVRLA is particularly concerned about TfL setting its own standards, and we are now seeing other major cities planning to set their own standards. This is starting to create uncertainty for operators about which vehicles to invest in.

The BVRLA is concerned that in setting their own standards, London – and now other cities – will accelerate a breakdown in cohesive national and international regulation. This is already having a practical impact on business. This is likely to increase in negative impact toward UK business.

We think that central government, not city or local government, should lead on setting clear and consistent standards for all parts of the UK. Such national (and international) standards underpin the operation of goods vehicles. Widespread and variable local standards will undermine the productivity and competitiveness of

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the UK and will fail to meet the claimed local safety and environmental benefits. The UK has very established processes for:

- Vehicle global standards through UNECE in Geneva that is responsible for type approval based on rigorous research and testing. All vehicles must be built and conform to these standards;
- Operator licencing, overseen by the Traffic Commissioners, which define a framework of management and accountability for safety standards within organisations up to boardroom level.

Integrate initiatives by operators into the scheme

Recognition of safety improvements to fleets implemented by HGV fleet operators should lead to the DVS being more flexible and mitigating its impact on business. This includes where operators/owners have introduced camera technology, noise warning and alert systems, or laser technology to improve safety.

New technology, integrated into vehicles, is likely to have more benefit for improving road safety rather than the DVS.

Appropriate and approved adaptations to vehicles to improve safety should also be fully recognised in the DVS star rating scheme and clear guidance on what adaptations or equipment is permitted.

Finally, where national government and TfL can provide incentives to upgrade vehicles to the highest standard, this is welcome. What will be required to incentivise fleets to upgrade to safer vehicles will be a wide-reaching package of reforms rewarding such upgrades to the highest safety standard. The cost of doing so must therefore be fairly compensated and incentivised as part of a wider national package.

Ensuring enforcement

We believe it is critical and only fair that the responsibility for liability from accidents is transferable to the actual operator of a vehicle, not the owner of the vehicle.

This is particularly relevant to our members who will own the vehicle leased or rented. We believe liability should be transferable irrespective of the length of an agreement.

Road safety measures

The BVRLA believes that establishing a national framework on road safety, as well as the re-establishment of road safety targets is needed. This national framework should address concerns with direct vision of HGVs and other large vehicles, as well as enforcement issues. As part of this enforcement, we would encourage greater education and awareness training for cyclists. Since HGV drivers are required to undertake CPC training every 5 years, a similar scheme would also be welcome for cyclists.

We would also support road and junction design being better develop to reduce the likelihood of road accidents involving motor vehicles. This is particularly important for cyclists turning left or right at busy junctions.

The BVRLA is happy to provide further evidence if requested.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Jay Parmar', with a horizontal line underneath.

Jay Parmar

Director of Policy and Membership

Bona-fides BVRLA, the industry and its members

- Established in 1967, the British Vehicle Rental & Leasing Association (BVRLA) is the UK trade body for companies engaged in vehicle rental and leasing.
- BVRLA membership provides customers with the reassurance that the company they are dealing with adheres to the highest standards of professionalism and fairness.
- The association achieves this by maintaining industry standards and regulatory compliance via its mandatory codes of conduct, inspection programme and conciliation service. To support this work, the BVRLA shares information and promotes best practice through its extensive range of training and events.
- On behalf of its 900+ members, the BVRLA works with governments, public sector agencies, industry associations and key business influencers across a wide range of road transport, environmental, taxation, technology and finance-related issues.
- BVRLA members are responsible for a combined fleet of almost five million cars, vans and trucks, supporting around 465,000 jobs and contributing £49bn to the economy each year.