

TfL briefing

# Industry readiness for forthcoming DVS requirements

17 May 2024



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# Summary

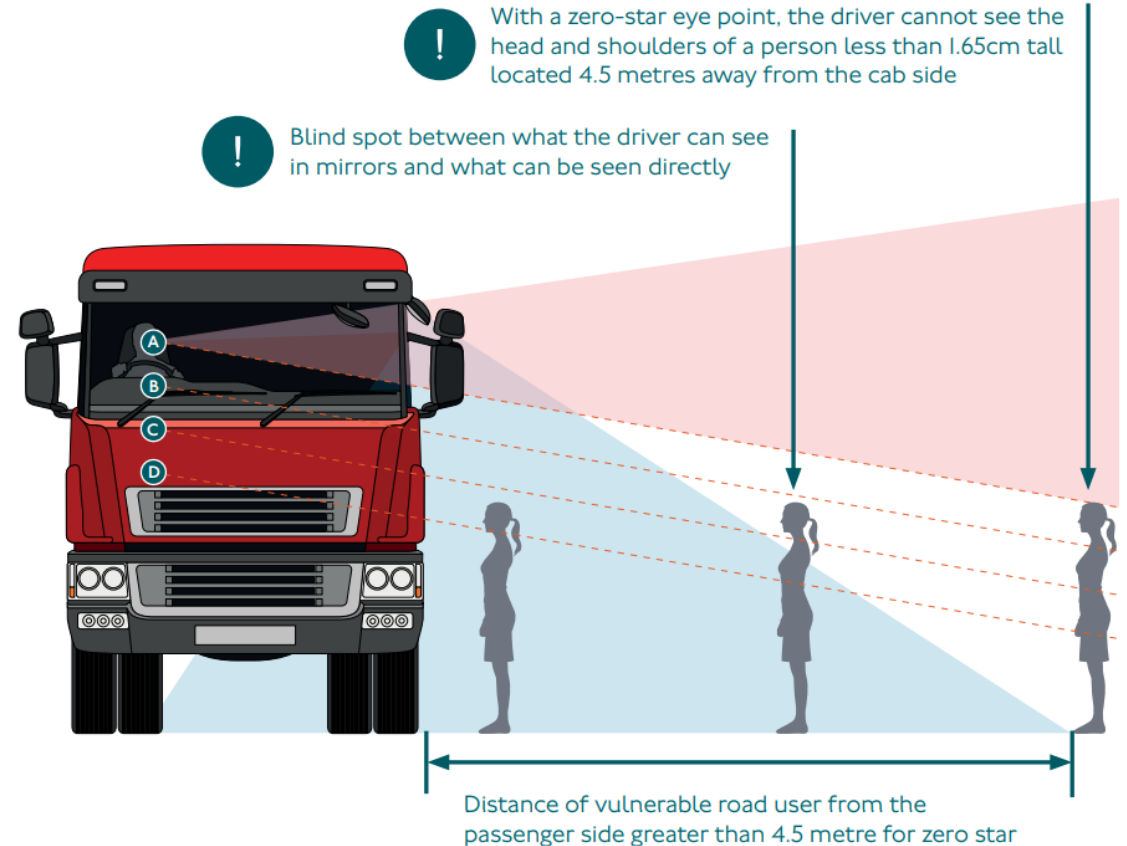
- The Mayor has adopted Vision Zero for road danger in London, with the aim of eliminating all deaths and serious injuries from London's streets by 2041
- Heavy Goods Vehicles (HGVs) historically pose a disproportionate risk to people walking and cycling. That is why we developed the world's first Direct Vision Standard (DVS) and the HGV Safety Permit Scheme in 2019-21
- The scheme requires that operators of HGVs (>12t) must hold a safety permit to operate in London and, 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
- The minimum standard is currently one star to operate without the Safe System. This will increase to three stars from 28 October and **zero to two star vehicles will need to have the new 'Progressive Safe System'** to operate in London
- This presentation summarises the new requirements and industry readiness that will apply from end-October, and what we are doing to support industry preparations



# Background: The Direct Vision Standard

- The DVS is designed to minimise the risk to vulnerable road users from limited driver vision from the cab
- Restrictions in the HGV driver's field of vision, or 'blind spots', are a significant contributing factor in collisions between HGVs and people walking, cycling and motorcycling
- The level of vision from the cab is calculated using CAD modelling and given a star rating from zero to five, with 'zero star' being the lowest and 'five stars' the highest
- The star rating of a vehicle is therefore dependent on the vehicle design and is fixed. Additional safety measures can help to improve the driver's indirect vision from the cab (but this does not change the star rating)

## HGV star rating boundaries



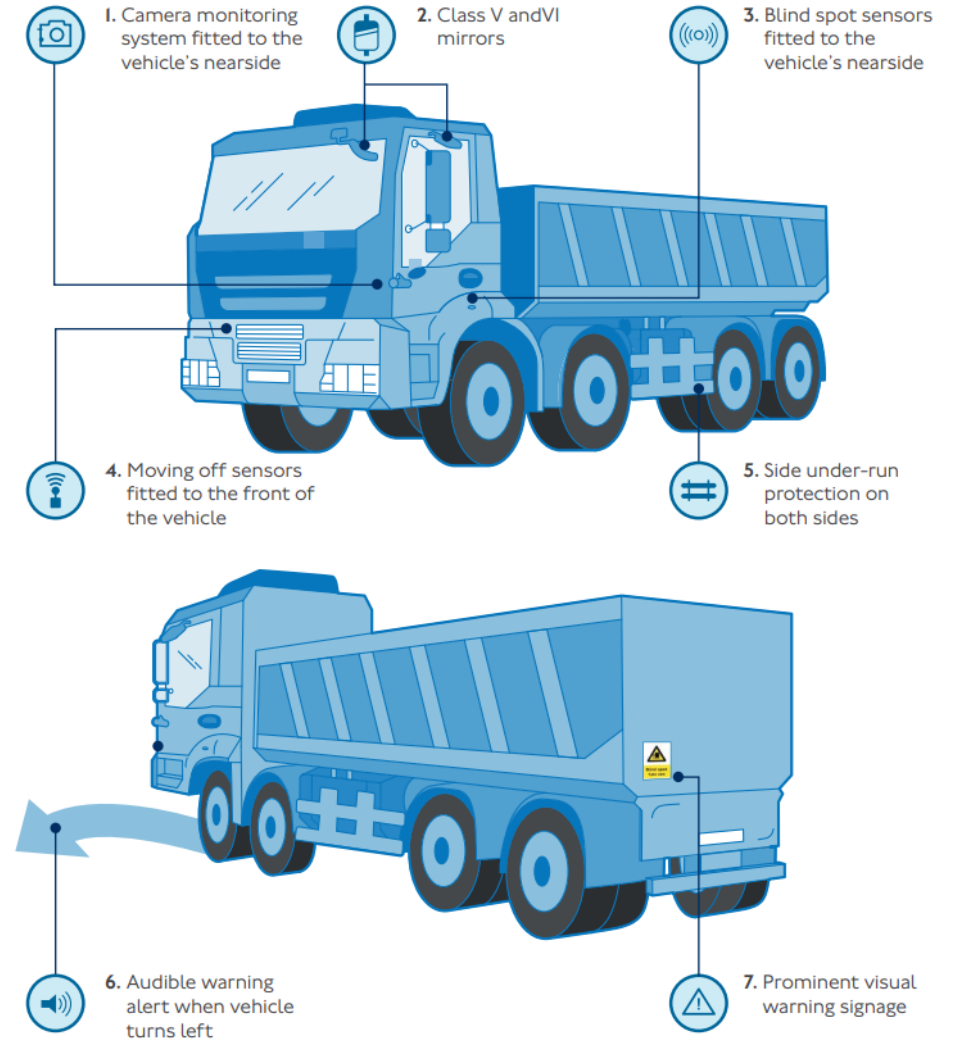
# The impact of the DVS

- **DVS has helped to reduce KSI incidents involving HGVs:** using a baseline of 2017-2019 (averaged), there has been a 49 per cent reduction in the number of people walking, cycling and motorcycling killed by a Heavy Goods Vehicle, and 30 per cent decrease in people walking, cycling and motorcycling seriously injured in collisions with HGVs
- This is positive, **but we need to do more:** a combined total of 14 fatal collisions occurred between 2020 and 2021 where vision was a factor, which is tragic and unacceptable. These collisions also come at an economic cost which the DfT puts at £29.68 million
- Most importantly, **each collision causes very real pain and anguish** for people affected that might have been avoided: the victim, the driver, their families, friends and colleagues
- **Our DVS scheme is seen as innovative and world-leading.** It has directly influenced new UNECE regulations to provide minimum direct vision requirements for all new vehicle designs sold in Europe, and EU regulations also now require consideration of direct vision in cab design. Many other global cities are considering copying our approach including New York, Paris, Amsterdam, Oslo and others



# The new Progressive Safe System

- The updated standard of safety measures is known as the 'Progressive Safe System', and will be required for zero to two star rated HGVs from 28 October
- The PSS is based on the existing Safe System in use since scheme launch in 2019, but with some new requirements such as Moving Off and Blind Spot sensors which will now be mandatory
- We consulted on the form and content of the PSS in spring 2023.



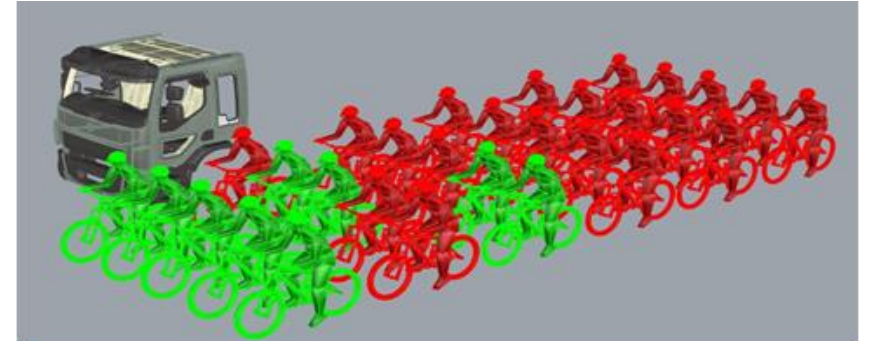
# What is the difference between Phase 1 and 2 of DVS?

## What new equipment must be installed?

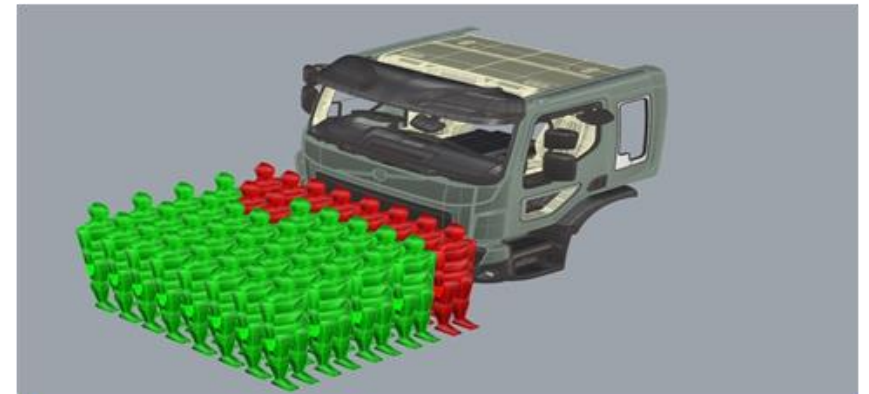
- If not already installed, BSIS and MOIS must be fitted to all zero, one and two star vehicles
- The vast majority of zero star vehicles will already have all other equipment required by the PSS
- Most PSS equipment comes fitted as standard on all vehicles e.g. side under guards, mirrors, audio warnings
- All new vehicles sold in the EU and UK from 2024 are PSS compliant, with the exception of warning signage

## Why has TfL mandated the use of MOIS and BSIS?

- TfL expects the PSS to eliminate the most common types of fatal and serious injury between HGVs and people walking and cycling (left turn and moving off from rest) and further aid HGV drivers in operating safely in an urban environment




**BSIS: Only 9 of 30** cyclists can be partially seen from the driver's cab (2\* vehicle used). Blind spot warning systems **could pick up all 30.**



**MOIS: Currently, those pedestrians in red cannot be seen. By mandating MOIS the driver will be alerted to all pedestrians.**



## What has happened so far?

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- June 2019:** TEC gave approval for the issue of safety permits to the minimum DVS star rating to be one star and for it to increase to three stars from **28 October 2024**. TEC also delegated TfL with authority to administer, operate and enforce the Scheme
  - March 2021:** TfL begins enforcing the HGV safety permit scheme
  - December 2022:** TEC agreed to the TfL consultation on the form and content of the new Progressive Safe System. The consultation took place in **Spring 2023**
  - June 2023:** We reported on the consultation outcome and recommended the final PSS standard for approval on 8 June 2023, and a three month grace period to apply from 28 October. We committed to return to TEC in summer 2024 with an update on industry readiness
  - September 2023:** We published updated operator's guidance and technical specifications for the PSS



# Preparing for launch of the new requirements

We estimate there are c. 216,000 zero to two star rated vehicles that will need to take action. Recognising the significant undertaking facing industry, we have:

- **Published operator's guidance** setting out the equipment requirements for the PSS, including technical specifications
- **Engaged extensively** with operators, including 40 conversations and presentations with industry representatives, installers and equipment suppliers to support implementation
- **Worked closely with industry** to assess their readiness for the new requirements. This included a **survey of operators** and close dialogue with the sector, as well as our own research
- Together with the Walking and Cycling Commissioner, **met with trade representatives** to discuss the results of the survey, consider the RHA's survey outcomes and collectively identify a way forward

## *Results of TfL industry readiness survey which took place between 8 Jan – 6 Feb 2024*

- **89 per cent** of respondents were aware that the DVS requirements were changing
- **57 per cent** were very or somewhat familiar with the DVS operator's guidance
- **78 per cent** of respondents expected to use the planned three-month grace period
- Of those who were not confident of being able to meet the 28 October deadline:
  - **22 per cent** stated this was because of the cost of procuring and fitting equipment
  - **18 per cent** said lack of equipment available
  - **14 per cent** said lack of understanding of the PSS requirements, or of what action needs to be taken





# Outline of industry engagement

Throughout the development of the PSS we have worked extensively with industry partners. This included:

- **November 2021 and October 2022:** Six workshops with industry partners to develop and refine the PSS
- **Between May 2023 and May 2024:** Freight trade associations met three times with the Deputy Mayor for Transport and twice with the Walking and Cycling Commissioner
- **Between May 2023 and May 2024:** Freight trade associations have met with TfL officers eight times to discuss technical issues
- **Since the publication of the updated Guidance for Operators and technical specifications on 4 September 2023:** TfL officers have had over 30 individual conversations with operators, trade bodies, equipment manufacturers and fitters

TfL officers also:

- Attended industry wide events to further explain DVS
- Hold weekly freight calls with the industry to discuss any topical issues
- Respond to ad-hoc emails and enquiries from stakeholders



# We have taken steps to clarify technical specifications in response to industry queries

I don't understand what equipment I need to fit / the specifications aren't clear.



- The specification and PSS standard will always be a complex technical document. We took steps to make the required standard clear, including:
  - Publishing the updating Operator's Guidance in Sep 2023
  - Providing detailed technical specifications which together are much less ambiguous than when the DVS first launched
- We have also remained available for technical conversations with stakeholders where requested, and the project team is in regular contact with industry representatives and suppliers as they work to implement the new requirements
- Following the review of industry readiness, we agreed to review the technical specifications and made a small number of technical clarifications to aid interpretation of the standard.
- We met with the freight trade bodies on 9 May to discuss the clarifications to the BSIS technical specification. The freight trade bodies are reviewing those clarifications now. We aim to upload to our web site the week of 27 May. Loughborough University have further produced a two page clarification note to aid suppliers and operators interpret the technical specifications which will be published by 27 May.



# We are working with industry stakeholders to address delivery challenges

There isn't enough time to fit all my vehicles / the industry needs additional time to meet the new requirements.



- We recognise the significant number of vehicles affected by the changes and the undertaking from industry to make them compliant
- The intention to raise the safety standard has been our consistent policy since the Vision Zero action plan (2018) and Freight and Servicing Action Plan (2019)
- Nevertheless, we acknowledge the timescale will be challenging for the freight industry to meet. That is why we recommended a grace period following consultation, which will run from 28 October to 31 January 2025 to broaden the time available for vehicle fitting
  - Operators will need to demonstrate that they have taken action to arrange fitting of PSS before 28 October in order to avail of the three month grace period
- We have monitored industry readiness closely and are open to considering a further extension of the grace period. This will be confirmed in our report to TEC in June 2024



## We are aware of industry calls for accreditation. As integrated transport authority we cannot directly accredit products

Why haven't TfL introduced an accreditation for safety measures as part of the PSS? Operators are not confident that products available comply with the specification.



- We recognise the variety of products for some equipment requirements in the market. TfL cannot directly accredit products as it would conflict with our role as the integrated transport authority. It would create a closed market and risk reducing innovation
- A certification process would add further costs to manufacturers and suppliers for demonstrating compliance. It would also add further complexity and cost to the scheme
- The consultation into the PSS did not show strong evidence in support of accreditation and similar TfL requirements in other sectors, such as the Bus Safety Standard, don't accredit specific products
- We have published technical specifications which are performance-based, meaning that they make clear what PSS safety measures are expected to do. Operators, who know their vehicles best, are then free to make commercial and engineering decisions about what products to procure and install



## We understand industry concerns around cost and have considered this in the Integrated Impact Assessment

There is a large cost burden for me to invest in the PSS. This is just another cost to industry / why won't TfL provide grants to support us?



- We recognise that the cost of installing safety measures will be met by hauliers. The Integrated Impact Assessment (IIA) considered this and suggested an average cost of around £1,500 per vehicle to install the PSS
- The IIA suggested that this cost, while not insignificant would be lesser than the costs if the HGV is involved in a collision. This might include police investigations, coroner's court attendance, loss of use of the vehicle and driver, increased insurance costs and potential reputational damage
- Most important of all is the very real pain and anguish for people affected by the collision that might have been avoided: the victim, the driver, their families, friends and colleagues
- Enabling HGVs to operate safely on London's roads benefits all of us, including the freight industry – it reduces the operators reputational risk resulting from collisions and avoids impact on the driver themselves. The PSS also improves the driver's experience of operating in urban areas by providing them the information they need to operate safely



## Next steps

- This briefing has set out TfL's update on its work with industry to support their readiness for the forthcoming new requirements
- We will continue to work with industry to support them in adapting vehicles to the new requirements
- TfL is scheduled to bring an update on readiness to the TEC meeting in June, and will set out any recommended changes to the three-month grace period for TEC to consider and approve
- The application portal for permits with a PSS condition (for vehicles fitted with the PSS) will open from end of June 2024, and the grace period will be offered for operators that need it





## Contact

Scott Wilding

[scottwilding@tfl.gov.uk](mailto:scottwilding@tfl.gov.uk)

