

Transport for London [consultation](#) on safer lorries

Brake response, 17 September 2014

Do you agree with our proposals to introduce a ban across London that would affect all lorries over 3.5 tonnes (except those vehicles listed in Appendix A) that do not feature:

	Strongly agree	Agree	Neither agree or disagree	Disagree	Strongly disagree	Don't know
Class V mirrors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Class VI mirrors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Side guards	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you agree that the proposals will improve safety for cyclists and pedestrians?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree
- Don't know

Appendix A lists those HGVs that can continue to be exempt from the requirement to fit sideguards and mirrors (Class V and VI). Do you think that there should be other vehicles listed? Please tell us which ones:

No (leave blank)

Do you agree that the ban should apply on all of London's roads (not including motorways)?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree
- Don't know

Please provide any further comments you have about our proposals in the box below:

Brake strongly supports Transport for London's proposals to impose minimum safety requirements, including class V and VI mirrors and side guards, on all lorries over 3.5 tonnes on all London's roads, removing the majority of current exemptions. This is a necessary, common sense and cost effective move to protect vulnerable road users, such as pedestrians and cyclists. Given the involvement of commercial vehicles in serious crashes with pedestrians and cyclists, and scope to improve the safety of vehicles on London's roads for the protection of vulnerable road users, it seems likely this move will save lives and serious injuries and help to encourage active travel, with all its associated benefits, as streets are made safer for walking and cycling.

Brake concurs with Transport for London that the best approach would be for these safety requirements to be fully implemented nationally, and supports its continued efforts to lobby the Department of Transport to this effect. However, in the absence of a national change, it is to be hoped that London will serve as a positive example in this regard and encourage other UK cities to follow suit. It also seems likely, given the large amount of commercial vehicle traffic that enters and moves around London, that this move will have a ripple affect on many operators around the country.

However, there is much more HGV operators can do to improve the safety of their fleets above and beyond what is required by law presently and these proposed safety requirements, in terms of vehicle adaptations, staff training, and better overall road risk management practice. Brake engages proactively with and advises hundreds of fleet operators to promote best practice and improve road risk management, and its fleet safety award scheme has evidenced how effective and straightforward fleet safety interventions and policies can help operators to significantly reduce costs as well as improving safety. *Find out more at www.brakepro.org.*

Brake is keen to work more closely with Transport for London in this regard, and applauds the positive example that has already been set by requiring contractual compliance with enhanced safety standards for Crossrail and other Transport for London projects. Measures Brake is urging the government to promote to improve fleet safety include the use of electronic blind spot devices, speed limiters, and telematics to monitor driver behaviour, alongside robust risk management policies and driver education and awareness work. Brake likewise encourages Transport for London to do all it can to increase the take-up of such measures. Brake would therefore suggest that in future TfL's minimum safety requirements for commercial vehicles entering London could go much further than those proposed here, to encourage adoption of a range of best practice policies and practices.