

## **Department for Transport Longer semi-trailer trial consultation**

### **Cycling Scotland submission February 2021**

#### **Question 4 – Noting the evidence set out in this consultation and in the annual trial reports, do you believe the LST trial should be concluded prior to its planned end date of 2027 and replaced by more widespread operation?**

The trial should be concluded prior to its planned end date and should not be replaced by more widespread operation. We are firmly opposed to any widespread roll-out of LST vehicles, as this would have a significant negative safety impact for vulnerable road users.

The LST vehicles can be up to 2.05 metres longer than standard length trailers, with a maximum length of 18.55 metres permitted. As the LST vehicles are significantly longer than existing HGVs on the road, there is a real and serious concern of increased risk from tail-swing or kick-out, particularly for vulnerable road users like people cycling and walking, which is acknowledged in the consultation. HGVs are a significant safety risk to people cycling on the road at their current length. This risk will be amplified and further extended with longer vehicles.

There is significant ambiguity in the consultation and accompanying documents on the safety of LSTs and their impact on collisions on roads. The consultation suggests that LSTs are safer for vulnerable road users than standard HGVs but the evidence for this statement is not clear. The consultation document states that the safety considerations only look at the direct effects of LSTs replacing standard trailers, with everything else held constant, and that in the trial LSTs are likely to be operated in a non-typical way. Paragraph 6 of the accompanying Impact Assessment states “*until LSTs enter into general circulation and are not being operated under the more rigorous conditions of the trial will we know whether LSTs can be operated as safely as standard trailers*”<sup>1</sup>. This is problematic as the trial is therefore unlikely to reflect real world conditions where the vehicles will be operating on a day-to-day basis, and so a significant amount of the risk remains unknown. In this regard, as the trial will not be able to prove that the LSTs can be operated safely, the increased length should not be permitted in any circumstances.

A further concern is, whilst the consultation claims LSTs will take a significant number of HGVs off the road, doing so could conceivably free up driver capacity to enable them to drive other vehicles. This undermines the justification for LSTs reducing vehicles kilometres travelled and could lead to an increase in numbers of other vehicles, such as other vehicle types used to transport freight and goods on the roads, which pose a significant safety risk for vulnerable road users.

Paragraph 123 of the Impact Assessment outlines that the LSTs replacing standard trailers would be doing so at higher weights, and there would also likely be an increase in noise generated from the vehicles as a result. This is in addition to the significant implications of the longer length of the vehicle and the additional space required for manoeuvres. Permitting

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<sup>1</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/933259/impact-assessment-longer-semi-trailer-trial.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/933259/impact-assessment-longer-semi-trailer-trial.pdf)

longer (and heavier) vehicles also has significant costs for the public purse, with bridges and other road infrastructure requiring significant upgrades to be able to accommodate such vehicles. In particular, there are many roads in rural Scotland that would not be able to cope with longer and heavier vehicles, resulting in significant negative consequences for safety, the local and immediate surrounding area, and broader environmental impacts.

**Question 5 - Do you prefer no operation of LST operation outside the trial, the lighter additional regulation option, heavier or general circulation?**

As outlined in our response to question 4, our preference is for no operation of LSTs outside of the trial and for the trial to end as soon as possible.

We are concerned that the Department's preference is for the lighter additional regulation option. The proposals in this option to remove the cap on the number of LST vehicles permitted, limited driver training, and no restrictions on the types of roads the vehicles are permitted to use are of particular concern.

The lighter additional regulation option outlines that specific training for LST drivers, lasting half a day, would be provided by the fleet/vehicle operator. Such a limited training requirement for operating these vehicles is concerning. As the training provided is provided by the fleet operator, this could also result in inconsistency in the quality of training received, which may not be the same nationally. Our preference would be for nationally recognised training to be delivered to all drivers alongside a course which specifically educates drivers of LSTs on vulnerable road users as a minimum. Cycling Scotland runs a training course for HGV drivers called Practical Cycle Awareness Training (PCAT) which allows drivers of large vehicles to step into the shoes of more vulnerable road users, including those on bikes, on foot and those with disabilities to provide them with a greater understanding of their needs<sup>2</sup>. This is the same as the Safe Urban Driving courses offered in England. In line with the proposed trial and the known safety risk of the LSTs to people cycling, and other vulnerable road users, we would like to see PCAT and similar training courses being rolled out for all LST drivers, with a particular focus on drivers who use routes that are used regularly by people cycling.

In the stakeholder feedback section of the consultation, it notes concerns from local authorities of LSTs being unsuitable for roads in their areas. Local authorities should have the power to be able to control LSTs using and accessing their entire road network. In Scotland, the trunk road network is operated and maintained by Transport Scotland, with local authorities having responsibility for all other roads in their respective area(s). We believe all roads authorities should have the ability to restrict LSTs. We note the consultation document states that local authorities may incur additional expense for auditing routes to assess their suitability for LSTs. We do not believe local authorities should be expected to incur these costs. It is also likely that bridges and road surfaces that are unsuitable to support such vehicles are more prevalent on local roads.

There is already a major shortfall in maintenance of local roads in Scotland, estimated at around £1.8bn by Audit Scotland, and this should be addressed first before any expansion beyond the trial is even considered.

A possible compromise would be to restrict these LST vehicles to motorways and the trunk road dual carriageway network, which are recognised in the consultation as being more

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<sup>2</sup> <https://www.cycling.scot/what-we-do/training/practical-cycle-awareness-training>

suitable to accommodate longer and heavier vehicles (like LSTs). We note the proposal in the heavier additional regulation option that at least 80% of each LST journey needs to be on major roads. This is more preferable than the proposal in the lighter additional regulation option. The proposal could go further by extending this to 100% of each LST journey to be on motorway and trunk (dual carriageway) roads.

It is local roads, operated and maintained by local authorities, that are the roads most frequently/commonly used by people cycling for short everyday journeys. In this regard, such vehicles should be able to be banned from using local road networks. In our recent response to the Scottish Government's consultation on Scotland's Road Safety Framework to 2030, we argue that a key aspiration for improving road safety should be to pursue the principle that HGVs and bikes should not have to share the same road space<sup>3</sup>. This means managing HGVs on roads that people are cycling on (and people are walking on), during times they are likely to be cycling and ensuring there is separate, appropriate space for cycling. As a minimum, any expansion in LST use beyond the trial must ensure that this does not include roads that are frequently used by people cycling.

### **Question 6 – If LST use is permitted more widely, what is your view of the government proposals in relation to:**

- **the number of LSTs permitted?**
- **data required to be collected by operators?**
- **incident reporting required by operators?**
- **controls on usage of specific road types?**
- **specific Operator Licencing requirements for LST operators?**
- **LST-specific Construction and Use requirements?**

As previously outlined, we do not believe that LST use should be permitted more widely, due to the significant negative safety risk to people cycling and other vulnerable road users.

If use was to be permitted more widely, in relation to the above proposals:

- The number of LSTs should be limited and controlled on motorway and dual carriageway use only. This is the first step in ensuring use of the vehicles is controlled and not allowed to exponentially grow uncontrollably.
- Operators should be required to collect data. Such data is important for monitoring activity of the vehicles, in particular for the routes taken by the vehicles, to ensure they are complying with regulations permitting which routes they can access. This needs to be accompanied by an appropriate system and mechanism for recording and analysing the data received.
- Incident reporting is vitally important and should be actioned as a priority. Having a record of any incidents involving LST vehicles is essential for improving safety, understanding if specific routes pose a high(er) risk, and understanding the risk to specific groups of road users, such as vulnerable road users, for example. As with the other data above, this needs to be accompanied by an appropriate system and mechanism for recording and analysing the data received.
- As previously outlined, controlling the usage of specific road types is a priority and presents a significant safety challenge for people cycling and other vulnerable road users if this is not done. LSTs should be limited to using the motorway and dual carriageway trunk road network. They should not be permitted to use local, smaller roads.

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<sup>3</sup> <https://www.cycling.scot/mediaLibrary/other/english/8631.pdf>

**Question 14 – Are there any costs or benefits that we have not considered in the Impact Assessment that you think should be considered? Please could you provide detail for these using evidence where available.**

Annex A of the Impact Assessment does outline and account for safety impacts of LSTs on people cycling and walking. Despite this, it does not fully account for all of the significant negative safety risks posed by these vehicles to vulnerable road users, and, as previously mentioned, does not account for safety under real-world operating conditions, which is hugely problematic.

The impact on rail freight needs to be properly taken into account, given rail freight's role in reducing lorry miles and related road danger and climate change emissions.

The broader health and environmental costs from operating LSTs have also not been considered. An increase in these vehicles on the roads will not only increase carbon and other greenhouse gas emissions, such particulate matter emissions from braking and tyre, which are widely recognised as being harmful to health at any concentration<sup>4</sup>, but can also cause congestion and increase the number of vehicles on the roads, which has significant negative (public) health impacts.

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<sup>4</sup> Lelieveld, J, K. Klingmuller, A. Pozzer, U. Poschl, M. Fnais, A. Daiber, and T. Munzel (2019) 'Cardiovascular disease burden from ambient air pollution in Europe reassessed using novel hazard ratio functions' European Heart Journal 0:1-7  
<https://academic.oup.com/eurheartj/advancearticle/doi/10.1093/eurheartj/ehz135/5372326>