



Department
for Transport

Ending the longer semi-trailer trial

Consultation response

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Executive Summary

Introduction

The main areas asked about in the consultation concerned:

- the general circulation of longer semi-trailers (LSTs)
- LSTs being removed from circulation altogether
- what level of additional regulation LSTs should be subject to
- issues regarding safety hazards

General Circulation of LSTs

57% of respondents felt that LSTs should be in general circulation and could see the positive effects for the industry and environment. 43% of respondents felt that LSTs should be removed from circulation entirely.

31% agreed that they should be brought into general circulation with no restrictions on numbers.

In proceeding with DfT's preferred policy option (allowing general circulation of LSTs with additional regulatory controls), several control mechanisms will be enforced to control the use of LSTs in general circulation, along with annual reports and regulation to monitor their continued use and compliance.

The 43% of respondents who felt LSTs should be removed entirely were private individuals, campaigns and charities concerned with road user safety. These respondents raised concerns for vulnerable road users. Most stated their opposition to LSTs being used in urban areas or on minor roads, where the exposure to vulnerable road users is increased.

The future operation of LSTs will include their use under the regulatory regime applicable to commercial operators of heavy goods vehicles (HGVs), including operator licensing legislation. The main purpose of goods vehicle operator licensing is to ensure the safe and proper use of goods vehicles and to protect the environment around operating centres. The licensing provisions include the Goods Vehicles (Licensing of Operators) Act 1995

(the Act), the Goods Vehicles (Licensing of Operators) Regulations 1995, the Road Transport Operator Regulations 2011, and the Goods Vehicles (Licensing of Operators) (Fees) Regulations.

In the preferred policy option 1 (general circulation of LSTs with lighter regulatory control), other measures must be adhered to in addition to those outlined within an operator's licence. These, amongst other things, are designed to increase the safety of vulnerable and other road users and address road access concerns relating to minor and urban areas within the routes of LSTs. These measures include:

- operators being required to undertake a risk assessment of the proposed route for the LST to ensure it is appropriate
- operators being required to retain a record of all risk assessments undertaken prior to LST journeys
- specific driver training, lasting a minimum of half a day
- operators being required to put in place a system to allow drivers to provide feedback on routes proposed and followed. A record of this feedback and response provided by the operator will be required to be kept on record
- operators being required to undertake compliance checks to ensure LSTs are following the routes set and to take appropriate action where deviations are identified
- operators being required to ensure that there is a process for managing the effects of road closures

Level of additional regulation

36% of respondents agreed that the lighter regulatory option was the best approach. 20% of respondents favoured the introduction of LSTs into general circulation without additional regulation. 4% of respondents that felt another approach should be sought, suggesting that modal shift to rail should be encouraged. In all, 60% felt that the heavier regulatory approach was not necessary.

40% of respondents preferred the heavier regulatory approach, mainly due to the safety risks to vulnerable road users and for the increased monitoring of LST usage. Some felt that the training under the lighter regulatory was not an adequate level to safely operate LSTs.

The majority of respondents were in favour of bringing in some form of additional regulation, whether this was via the lighter or heavier options suggested in the consultation. Accounting for the consultation responses and reviewing the Impact Assessment and trial data, DfT considers that the lighter regulatory option is the most appropriate option to progress. This is because it allows for extra regulatory controls around training, safety, risk, monitoring and usage while producing the most net benefits for both LST operators and the public. Option 2 would be liable to reduce the uptake of LSTs substantially, not just adding more costs but also leading to fewer public benefits.

Supporters of the lighter additional regulatory option generally appear to have previous experience within HGV operations, consistent with understanding the practicalities of complying with safety related regulations.

In proceeding with this option, the use of LSTs contributes to the Government's Transport Decarbonisation Plan and may feed into other multimodal activities throughout Great Britain. The assessment of option 1 is that it would lead to HGV mileage reductions, which in turn would lead to a reduction in congestion and emissions of carbon dioxide and other air pollutants.

Most of the respondents that replied said they felt LSTs should complete at least 80% of their journeys on the Strategic Road Network, should be tracked via GPS, be required to report serious incidents, undertake risk assessments for routes, retain data for the Traffic Commissioners and gain annual authority to use LSTs over 10 years old. Between 53% - 91% of private individuals, campaign groups and charities agreed that all of these should be a requirement.

Between 9% and 47% of respondents disagreed with these additional requirements. These responses were mainly from operators and trade associations, with a common view that many of these conditions were either excessive or surplus to requirements. The requirements are also fulfilled through operator's obligations under the current regulations of commercial vehicle operation. Regulations for reporting incidents, health and safety issues and training requirements already exist in current legislation under The Management of Health and Safety at Work Regulations 1999 s13, Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR), as well as requirement to report incidents involving LSTs where there is injury on public roads.

Based on the analysis carried out within the Impact Assessment and the trial data from 2012, even under a scenario where the accident risk rate is higher for LSTs, as indicated by the TRL desktop research, LSTs are liable to provide a net benefit to society through accident reduction. This is due to the reduction in miles travelled compared to standard trailers outweighing the potential increased risk of operating LSTs. Using the observed data on accidents from the trial, the benefits could be significantly higher. However, given LSTs are currently operating under trial conditions, this additional risk reduction is not liable to be fully applicable to non-trial conditions.

Safety concerns

The overwhelming majority of respondents that raised safety concerns were in relation to the increased safety risks for vulnerable road users. 63% of respondents saw this as the biggest hazard caused using LSTs, of this group, 38% were individuals, the remainder were made up mainly of charity and campaign groups. Many of these responses said that LSTs should only be used on the strategic road network and kept off minor roads and out of towns and cities.

21% of respondents felt that there were safety implications for vulnerable road users, but also for the roads and infrastructure.

Trade associations (representing large numbers of operators) were in the 13% of respondents which considered that LSTs are safer in the way they behave and handle and encourage their usage over standard articulated lorries. They noted not only the safety of the vehicle itself, but also improvements to overall safety by reducing freight on the roads (by reducing the number of vehicles required to transport the same volume of goods) and decreasing emissions (by reducing the number of journeys necessary).

The LST trial has seen a reduction in journey numbers and pollutants compared to 13.6m semi-trailers, whilst LSTs have operated at least as safely as standard 13.6m trailers. The main policy objective is to enable the transportation of the same volume of freight by fewer journeys on the basis that the main drivers of safe and efficient utilisation are maintained, while encouraging the widest realisation of efficiency and environmental benefits and maintaining road safety levels for all road users.

Various controls will be used to mitigate against the risk of an increased casualty rate, including:

- requirements for a steering axle design, to reduce the tail-swing or kick-out of the trailers. Other designs such as active steer or other technologies could also provide mitigations
- operating standards, such as operator licensing requirements, qualifications and driver training
- controlled trial conditions, replicating some route assessment conditions from the LST trial

Therefore, although LSTs are longer, mitigating actions will be put in place that will prevent the LST casualty rate increasing to a significantly higher rate than for standard articulated HGVs and that with appropriate operational management could lower the accident risk (as has been demonstrated on the trial). These all mitigate the main areas of concern raised by respondents within the consultation by only allowing LSTs into general circulation with additional regulatory control.

Introduction

An LST is a semi-trailer with a length of either 14.6 metres or 15.65 metres. This is up to 2.05 metres longer than standard length trailers (13.6 metres) under construction and use regulations. An LST has a maximum total vehicle length, including tractor unit, of 18.55 metres.

Since 2012, trials of LSTs of up to 15.65 metres has taken place on roads in Great Britain (GB), enabling 30 standard pallets to be transported in a trailer opposed to 26, offering more efficiency and fewer lorry journeys for commodities limited by bulk as opposed to weight. This ongoing trial now involves around 2,600 LSTs.

The principal objective of LSTs is to facilitate more efficient and environmentally beneficial freight transport. It seeks to permit the transportation of an equal amount of freight in fewer journeys by allowing longer vehicles, which will achieve an emission saving as fewer pollutants will be emitted during the transportation of the same amount of goods. It is also anticipated that this will have a positive benefit on congestion as fewer trips will be required.

Annual reports on the progress of the trial have been published since 2013 and are available to view [here](#).

Up to the end of 2019 the trial result indicated that:

on average, the use of LSTs reduced journey numbers by 1 in 12, with more than 54 million vehicle kilometres saved
48,000 tonnes of CO₂(e) and 241 tonnes of NO_x have been saved
on a per kilometre basis LSTs have been involved in about 53% fewer personal injury collisions and casualties than the GB articulated HGV average

Public consultation on ending the LST trial took place from November 2020 to February 2021, 46 responses were received to the consultation document and questionnaire issued.

The preferred option put to consultation was policy option 1 (lighter additional regulation, described in Annex B of this document). It is lighter in the level of additional regulation applied to the use of LSTs than option 2 (heavier additional regulation). Options 1,2 and 3 (no additional regulation) would all require that rules applicable to standard length trailers are adhered to when using LSTs. All 3 options would allow the whole of the road freight industry to have access to LSTs (without restriction via quotas) and therefore make an

important contribution to reducing emission levels. The implementation of the wider operation of LSTs is to be based on consultation option 1 (with some developments, as more detailed implementation work has progressed). An outline of the proposed approach to implementation is discussed in Annex A to this document.

The proposed additional regulation (option 1) beyond that in place for standard 13.6 metre trailers, takes into consideration issues and concerns raised in response to the consultation regarding:

- LSTs being operated on inappropriate roads
- increased the road safety risk, particularly to vulnerable road users
- damage to street furniture

As set out in the table below, a total of 46 responses were received in relation to the consultation's questions via an online form and specific questions. 31 respondents answered the questions in the online form and the remaining 15 either responded to the 14 main questions or made overall comment about the trial. Of these, 20 responses were on behalf of an organization and the remaining 26 were from private individuals. A response was completed to the impact assessment by an internal subject matter expert. DfT is grateful for the considered evidence and opinions submitted in response to this consultation.

Who responded & how?	As an individual?	On behalf of an organisation?	Total responses
Main questions	7	8	15
Online questions	19	12	31
Total responses	26	20	46

Question 4. What size is your organisation?

Size of organisation	Number of responses
1 to 9 employees	1
10 to 49	1
250 and above	3
50 to 249	2
50 to 249 employees	2
50 to 249 employees	1
No response	21
Total responses	31

Question 5. Has your company operated LSTs in the trial?

Responses	No	No response	Yes	Total responses
Number of responses	8	19	4	31

Question 6. How many LSTs do you have? How many were used in the trial?

Number of trailers	Number of LSTs your company currently operates?	Largest number LSTs you operated during the trial?
1 to 5	1	1
6 to 10	1	1
More than 10	2	2
No response	27	27
Total responses	31	31

Question 7. Have you been involved in the LST trial in any way?

Responses	No	No response	Yes	Yes	Total Responses
Number of responses	20	8	2	1	31

Question 8. How have you have been involved?

Responses	As an owner	As an operator	As a driver	As something else	Total Responses
Number of responses	0	0	2	1	22

Responses to the consultation questions

The responses have brought a range of issues to the attention of the Department and helped to inform a decision on the best way forward.

A total of 46 responses were received from external organisations and individuals. The respondents to the consultation included:

local government authorities
 central government departments
 road transport operators
 transport industry trade bodies
 academics/researchers
 campaign groups

The summary of responses is structured according to the questionnaire sections in the consultation document (specific questions & online questions).

Question 9. Do you agree that the LST trial should be concluded prior to its planned end date of 2027?

Responses	No	No response	Yes	Total responses
Number of responses	4	1	26	31

Of the 31 responses the vast majority said that the trial should be concluded prior to the end date of 2027. 4 respondents said no to the trial being concluded prior to the end date, the following 4 questions gave more detail about the reasons respondents either agreed or disagreed.

Question 10 & 11. You are against stopping the trial because the trial:

has not provided sufficient data in order for a decision to be made
 is planned to run until 2027 so should run until then regardless

Responses	No response	Should run until 2027	Concerns about safety of LSTs on public roads.	Total responses
Number of responses	27	2	2	31

Question 12 & 13. You are in favour of ending the trial because:

you are opposed to LSTs being on UK roads
there is sufficient data in order for a decision to be made at this time

Responses	No response	There is sufficient data already	Opposed to LSTs being roads	Total responses
Number of responses	5	15	10	30

15 respondents felt that there is sufficient data already to consider the merits of the trial. The 2 respondents that answered that the trial should continue until 2027 in their remaining answers opposed the trial taking place at all. The 10 respondents opposing LSTs being on the UK's roads mainly raised concerns about the safety implication for other road users, particularly in town centres, with some suggesting that LSTs should only be used on motorways.

Question 14. As you are against LSTs being on UK roads and the rest of this survey is about regulating such use you may either:

go to the final comments section
continue answering the survey

Responses	Continue answering the survey	Go to the final comments section	No response	Total responses
Number of responses	6	4	21	31

Question 15. Do you believe that LST use should be permitted in general circulation with no restriction on numbers?

no I disagree LSTs should be permitted in general circulation at all
yes I agree LSTs should be permitted in general circulation, but with restricted numbers
yes I agree LSTs should be permitted in general circulation and with no restriction on LST numbers
don't know

Responses	LSTs should not be in circulation	No response	No restriction on numbers	With restriction on numbers	Total responses
Number of responses	10	6	10	5	31

Question 16. Why are you against general circulation of LSTs?

Responses	Comment made	No response	Total
Number of responses	9	22	31

All respondents that commented here raised concerns about the safety issues with increasing LSTs on the roads, particularly in town centres and particularly in regard to the serious safety issues LSTs could cause for pedestrians and cyclists. Many stating that the number of LSTs should be reduced, they should be kept to motorways or removed from circulation all together.

Question 17. As you are against LSTs being in general circulation and the rest of this survey is about regulating such use you may either:

continue answering the survey
go to the final comments section

Question 18. In your opinion the amount should be:

below 3,000
3,001 to 5,000
5,001 to 10,000
10,001 to 15,000
another amount above 15,000

Responses	5,001 to 10,000?	below 3,000?	No response	Total responses
Number of responses	4	1	26	31

Question 19. In your opinion what level of regulation should be required for LST operating outside the trial?

- the general circulation approach
- the heavier regulatory approach
- the lighter regulatory approach
- another approach

Responses	Another approach	No response	The general circulation approach	The heavier regulatory approach	The lighter regulatory approach	Total responses
Number of responses	1	11	5	9	5	31

Question 20. What is your alternative approach and why?

Responses	Comment made	No response	Total responses
Number of responses	4	27	31

One respondent raised concerns that as this trial has not achieved the reduction of vehicles, focus should now be reducing numbers of LSTs and encouraging modal shift to rail.

Another respondent concerned about the safety issues to vulnerable road users stated drivers must go on approved courses and refresher courses every 2 years. LSTs older than 4 years should not be in operation, ensuring fleets and vehicles have the most up to date and effective technologies, which warn both drivers and raise alerts to management when vehicles are being driven dangerously.

One respondent preferred the lighter regulatory approach but sees the benefit of more rigorous driver training required in the heavier regulatory approach.

Another respondent commented that the lighter regulatory option needs to be strengthened by restricting the operation of LSTs to motorways, A and B roads and modern industrial estates only. LSTs should avoid the use of minor and rural roads, avoiding safety issues to vulnerable road users and damage to roads and property. They had concerns small hauliers will not complete proper route assessments, considering rural roads and irregular movements.

Question 21. You agree that the data required to be collected by operators outside of the trial conditions should be:

- the same as trial conditions
- more than trial conditions
- less than trial conditions
- removed
- something else

Responses	Less than trial conditions	More than trial conditions	No response	Removed	The same as trial conditions	Total responses
Number of responses	1	7	14	3	6	31

Question 22. With regards to our risk assessment proposal you think operators should:

- be required to undertake risk assessments of routes, retain the data and be required to provide a copy to the police and other authorities (DVSA, OTC or Traffic Commissioner) on request
- not be required to undertake risk assessments of routes, retain the data and be required to provide a copy to the police and other authorities (DVSA, OTC or Traffic Commissioner) on request
- do something else

Responses	Undertake risk assessments	Do something else	No response	Not undertake risk assessments	Total responses
Number of responses	14	1	15	1	31

Most of the respondents who answered this question agreed that it should be a requirement to undertake risk assessments of routes, retain the data and be required to provide a copy to the police and other authorities (DVSA, OTC or Traffic Commissioner) on request.

One respondent felt that it should not be a requirement to undertake risk assessments of routes, retain the data and be required to provide a copy to the police and other authorities (DVSA, OTC or Traffic Commissioner) on request. The respondent pointed out that there exists a general responsibility for operators to consider the appropriateness of the routes they use their vehicles on. This has recently been highlighted by Traffic Commissioners in respect of operators' measures to prevent bridge strikes.

Question 23. Do you agree that each LST should be required to undertake at least 80% of each journey on the Strategic Road Network?

Responses	Don't know	No	No response	Yes	Total responses
Number of responses	2	3	13	13	31

3 respondents did not agree with this, the suggestion was made that 100% of these journeys should be made on the Strategic Road Network to minimise the dangers to other road users, with another stating that LSTs should not be used at all.

Question 24. What is your alternative?

Responses	Comment made	No response	Total responses
Number of responses	2	29	31

The 2 respondents that commented said that 100% of the LST journeys should be made on strategic road network or not at all.

Question 25. Do you agree with operators being required to track LSTs via GPS to ensure the 80% requirement is being achieved, retaining the data and making it available to the police, DVSA, OTC and the traffic commissioner on request?

Responses	No	No response	Yes	Total responses
Number of responses	3	13	15	31

3 respondents said no to there being an 80% requirement for tracking and retaining data, to be made available on request, with one suggesting that there should be a 100% requirement.

Question 26. Do you agree that operators should be required to report to the department serious incidents that led to:

- loss of life on public roads and private land
- injury on public roads and private land
- damage on public roads and private land
- if no, why not

Responses	No	No response	Yes	Total responses
loss of life on public roads and private land	2	12	17	31
injury on public roads and private land	2	12	17	31
damage on public roads and private land	2	12	17	31

Of the 2 individuals that said no to the reporting of these incidents, one commented that these requirements already exist in legislation (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR), Road Traffic Act 1988 s170, Operator licensing, The Management of Health and Safety at Work Regulations 1999 s13). Another said that they feel third party damage is an insurance matter.

Question 27. Do you agree with this training proposal for the:

- lighter regulation approach
- heavier regulation approach
- if no, what do you think the training should entail

Responses	No	No response	Yes	Total responses
lighter regulation approach	5	17	9	31
heavier regulation approach	4	14	13	31

The 4 respondents that did not agree with either approach suggested that 2 hours of extra training would be adequate. Others felt that the proposed extra training was not sufficient and that more regular and rigorous training should be put in place.

One respondent highlighted that the requirement for training already exists in legislation, adherence to it is a requirement of operator licensing and DfT should avoid duplication of administrative process in line with the Regulator's Code, under The Management of Health and Safety at Work Regulations 1999 s13.

Question 28. Do you think we should require operators to undertake a risk assessment of proposed routes?

Responses	No	No response	Yes	Total responses
Number of responses	4	14	13	31

Question 29. Do you think we should require operators to obtain specific authority from the Traffic Commissioner to operate LSTs?

Responses	No	No response	Yes	Total responses
Number of responses	3	14	14	31

Question 30. Do you think we should require annual authorisation from a traffic commissioner to operate an LST over 10 years of age?

Responses	No	No response	Yes	Total responses
Number of responses	7	14	10	31

Question 31. Do you think that the lighter additional regulatory option is a barrier to you:

- purchasing LSTs
- operating LSTs
- if yes, what issues

Responses	Don't know	No	No response	Yes	Total responses
purchasing LSTs	5	5	20	1	31
operating LSTs	5	5	20	1	31

One respondent answering don't know made additional comments that this may continue to restrict the benefit of LST use to some large own account fleet operators and their logistics service providers, especially in the volume constrained sectors of paper products, consumer goods, some manufactured foodstuffs and grocery.

The respondent that felt the lighter additional option did create a barrier to them said any additional bureaucracy should be avoided. Its members reported enthusiasm for adopting more efficient vehicles, to help achieve emission reduction targets. However, tools needed to be accessible and additional administrative processes will be a barrier to the adoption of

new advancements. Measures are already in place due to the operator licensing process measures no additional barriers should be sought.

Question 32. Do you think the heavier additional regulatory option is a barrier to you:

- purchasing LSTs
- operating LSTs
- if yes, what issues

Responses	Don't know	No	No response	Yes	Total responses
purchasing LSTs	5	4	19	3	31
operating LSTs	5	4	19	3	31

3 respondents felt that the heavier additional regulatory option does create a barrier for them and are not in favour of having to supply additional data and information. One suggested that there should be certain levels of compliance determined by the level of scrutiny an operator may be under and how many permits to operate LSTs are granted. For example, having a green operator compliance risk score (OCRS) or being a member of the Earned Recognition scheme would allow for automatic granting of permits and less demand for data production.

Question 33. If there was a situation where there were no additional regulatory measures required for LST purchase and operation which of the following would apply to you?

- I would seek to purchase more LSTs than I would have done under the other regulatory options
- I would now seek to operate LSTs where I would not have done under the other regulatory options
- I would operate LSTs as and when I can identify a current business need for them
- I have no current business need for operating LSTs but would like to own one to open up further business opportunities
- I would replace one or more of my 13.6m trailers with an LST variant instead

Responses	No	No response	Yes	Total responses
I would seek to purchase more LSTs	22	5	4	31
I would now seek to operate LSTs	24	5	2	31
I would operate LSTs as and when	23	5	3	31
I have no current business need for operating LSTs	26	5	0	31
I would replace one or more of my 13.6m trailers	22	5	4	31

Question 34. What, if any, further comments or barriers to owning LSTs with no additional regulation do you have?

Responses	Comment made	No response	Total Responses
Number of responses	4	27	31

5 respondents made comments, 1 suggesting increased use of specialised trailer technology to reduce the need for LSTs. Another stated that no further regulations should be imposed with the exception of suspension geometry and rear axle steering and axle spacing regulations. 2 pointed out the benefits of LSTs and that they should be able to operate at 48 tonnes to reach wider commercial, operational and environmental benefits.

Another highlighted that LSTs are useful, safe and ride better than standard trailers with the axle spacing, so additional regulation should not be imposed.

Another respondent commented that LST Annual Reports have demonstrated their ability to be operate on our roads safely and although there may be a belief that this is in part due to the conditions imposed on those operators involved in the trial, many of those requirements are fulfilled through their obligations under current regulation and obligations of commercial vehicle operators. They commented further that many of the regulations for reporting incidents, health and safety issues, training requirements already exist in current regulations.

Question 35. What, if any, other costs or benefits have not been included in the impact assessment that you think should be considered?

Responses	Comment made	No response	Total Responses
Number of responses	11	20	31

12 respondents made comments some raising concerns about the axle spacing to ensure maximum axle loadings are not exceeded, reducing wear on road surfaces. It was suggested to allow for steerable semi-trailer axles to be fitted with devices that enable reversing. Additionally, adding warning devices and signage to alert other road users of dangers, use of king-pin go-no go gauge at half yearly intervals to determine rate of wear on king-pins and maximum king-pin loading to be specified on the vehicle plate.

A respondent suggested innovation in trailer designs, encouraging use of new trailer designs in places where double decks cannot be used. Ensuring all new LTSs have standard requirements so that extra space is easily identifiable and can be utilised

Another respondent commented that the trial has not achieved the reduction of vehicles by increasing load factors, it should now focus on ways to limit numbers of LSTs on roads and improve modal shift to rail. Not enough consideration has been given to direct impact of damage to rail freight or damage to the roads.

One respondent pointed out that in paragraph 106 of the Impact Assessment DfT states it's unable to monetise the impacts of the requirements for accident reporting, but felt it should be possible this impact. They also highlighted that:

- for options 1 and 2, the Impact Assessment appears to omit the impacts those requirements would have on the Office of the Traffic Commissioner (OTC) in administering those proposals and any potential IT impacts they may have of their systems
- as the OTC's cost are off set by an element of the MOT Test fee, they believe those costs need to be included in the impact assessment, as they could result in a potential increase in MOT Test fees, which are imposed on commercial vehicle operators. The same principle would apply to any additional administration on DVSA.
- while Traffic Commissioners are supported by OTC staff whose resources can be bolstered to respond to new commitments, given there are only eight Traffic Commissioners. Introduction new expectations and duties on them will lead to a dilution of their existing responsibilities in respect of road safety and regulation

Other respondents commented that not enough has been done to consider the safety implications and the seriously increased risk to vulnerable road users in particular. Stating that no LSTs should be used at all.

Another commented that the equipment is expensive, although the increased capacity has delivered between 5% and 10% reduction in pallet trunking costs and reduced CO2 on those legs of up to 35%.

One respondent raised concerns about the additional noise and ground vibrations caused by LSTs and further consideration should be given this regard to both the impact on people and property.

Question 36. Any other comments?

Responses	Comment made	No response	Total Responses
Number of responses	19	12	31

12 respondents either did not agree with LSTs being on the roads at all or raised serious concerns about the safety issues to vulnerable road users and the damage caused to roads, property and the environment. Many suggesting that LSTs should not be allowed in towns and that moves should be made towards total separation of people cycling or walking from HGVs and improving logistics so that the final stages of delivery are completed by smaller vehicles. Encouraging as much modal shift to rail and improving the efficiency of this system was suggested. Also, that incident data from other sources should be used to cross reference self-reporting by the operator.

Another respondent commented that they have done some certificate of professional competence (CPC) training for fleet operators (cyclist awareness) and was very disappointed by the attitude of some drivers to training. It's important to fully understand potential impact on other road users, making regulation important. Sighting that they do not believe regulations will be onerous for professionally run companies, many are already route planning and monitoring automatically, to provide customers with real time delivery information. They would personally prefer to pay extra for deliveries that I they have been professionally and safely organised.

Another raised that The Campaign for Better Transport has previously estimated that 44 tonne trucks are 100,000 times more damaging to road surfaces than a Ford Focus. The

annual ALARM survey (2020) reveals that there is already a £9billion shortfall for local roads and that it would take 12 years to clear the maintenance backlog.

One respondent commented this is a sensible and practical development for road transport efficiency.

One respondent confirmed that although were not in a position to participate in the trial, but their business has since changed and is now in a position to take advantage of the use of LSTs. They felt that this would offer them cost savings from fuel, reductions in vehicle movements, reduce carbon emissions and pollutions due to less vehicle movements and increase efficiency of their freight movements throughout the UK. However, did highlight some limitation particularly in regard to transportation of bulk light materials. That the new rules for LSTs could make it more difficult for re-sale, regulations could be a restriction to operating extended trailers, operations based in more urban areas may have more difficulty meeting the requirements to operate LSTs and may require wider support and resources from local traffic authorities to ensure safe passage in urban settings.

Another commented that there should not be a requirement to impose any form of regulatory constraints beyond that of operators licencing and that much of the regulation already exists and to avoid unnecessary bureaucracy.

Summary of responses to the consultation's main 14 questions

In total 15 responses were recorded in relation to the main 14 questions. Of these 4 respondents answered the 14 questions directly and 11 respondents sent views on LSTs voicing their opinions via email. A total of 8 responses were on behalf of a business or organisation: 3 charities, 3 operators and 2 trade associations. The remaining 7 responses were on behalf of individuals.

Question 2. Are you responding on behalf of a business or organisation?

Responses	No	Yes	Total responses
Number of Responses	7	8	15

Question 3. Have you or your company operated an LST under the trial?

Responses	No	Yes	Total responses
Number of Responses	13	2	15

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

Responses	N/A	No	Yes	Total responses
Number of Responses	8	2	5	15

A total of 5 respondents agreed to the LST trial being terminated prior to 2027 and 2 respondents disagreed due to the need for further refinement of regulation and the collection of additional evidence as to the impact of LSTs on roads and communities. They stated that only then should an informed decision be taken on their future role.

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

Responses	Heavier	Lighter	N/A	No operation	Total responses
Number of Responses	1	4	5	5	15

1 respondent preferred the heavier option as they believe that the heavier regulation approach will bring additional benefits and will ensure excellent safety records of LSTs operated within the trial will be maintained. 4 respondents preferred the lighter option and 5 respondents stated their preference for no operation of LSTs.

Question 6.a. If LST use is to be permitted more widely, what is your view of the government proposals, in relation to: the number of LSTs to be permitted?

Responses	Limited numbers	Industry set quantity in operation based on commercial demand	N/A	No limit on numbers	Total responses
Number of Responses	2	2	10	1	15

2 respondents supported an Industry set quantity in operation based on commercial demand in order to control LST numbers, stating that they are in favour of 'business as usual' regulations with usage limitation issues decided by the market. This means that a cap on the total number of LSTs permitted should be removed, so to allow the market to decide the quantity in operation based on commercial need.

3 respondents were in favour of data being collected by operators, however they referred to specific data such as risk assessments and the collection and retention of driver feedback.

Question 6.b. data required to be collected by operators?

Responses	N/A	In favour - but specific data	Total responses
Number of Responses	12	3	15

3 respondents were in favour of incident reporting required by operators and highlighted this is a priority and a way in which to promote a safety culture.

Question 6.c. incident reporting required by operators?

Responses	N/A	In favour of Incident reporting	Total responses
Number of Responses	12	3	15

Question 6.d. controls on usage of specific road types?

Q6.d. Responses	Against - unrealistic / not needed	In favour	N/A	Total responses
Number of Responses	2	5	8	15

5 respondents were in favour of controls on usage of specific road types stating that LSTs should be limited to using the motorway and dual carriageway trunk road networks. 2 respondents were against such controls stating that it was unrealistic and not necessary to specify and limit LSTs to specific road types.

Question 6.e. specific Operator Licencing requirements for LST operators?

Responses	Against	In favour	N/A	Total responses
Number of Responses	1	1	13	15

Question 6.f. LST-specific Construction and Use requirements?

Responses	N/A	Against	Total responses
Number of Responses	13	2	15

2 respondents were against stating that no additional construction and use regulation is required as the existing regulations already cover all longer-semi trailer aspects.

Question 7. If LST use is to be permitted more widely, how long would you expect to own an LST for?

Responses	Up to 15 years	N/A	Total responses
Number of Responses	1	14	15

Question 8. If a maximum age should be placed on the life of an LST what do you think that age should be?

Responses	No maximum, determined by condition of trailer	N/A	Total responses
Number of Responses	1	14	15

Question 9. Should operators be required to apply to the Traffic Commissioner on an annual basis for approval to continue to operate an LST once the LST is over 10 years old?

Responses	N/A	No, safety aspect is already covered under Roadworthiness testing	Total responses
Number of Responses	14	1	15

Question 10. Compared to the trial, how much do you consider the lighter additional regulatory option will act as a barrier to you purchasing and operating LSTs?

Responses	N/A	Yes barrier, but in favour	Total responses
Number of Responses	12	3	15

3 respondents stated that they are in favour of the lighter additional regulatory option, in particular if a couple of aspects are removed, and that the burden is proportionate.

Question 11. Compared to the trial, how much do you consider the heavier additional regulatory option will act as a barrier to you purchasing and operating LSTs?

Responses	N/A	Yes, heavier regulation will act as a major disincentive	Total responses
Number of Responses	14	1	15

1 respondent stated that the heavier regulatory option will act as a barrier and as a major disincentive to procure LSTs. This is because it imports regulatory and compliance risk for businesses that will severely limit the uptake of the trailers for many operators.

Question 12.a. Under the option of no additional regulatory measures, to what extent do you agree or disagree with the below statements: I would seek to purchase more LSTs than I would have done under the other regulatory options

Responses	N/A	Yes, would seek to purchase more LSTs	Total responses
Number of Responses	14	1	15

Question 12.b. I would now seek to operate LSTs where I would not have done under the other regulatory options

Responses	I would now seek to operate LSTs	I would now seek to operate LSTs	Total responses
Number of Responses	1	1	15

Question 12.c. I would operate LSTs as I can identify a current business need for them

Responses	N/A	Yes	Yes, I can identify a current business need for them	Total responses
Number of Responses	13	1	1	15

Question 12.d. I have no current business need for operating LSTs but would like to own one to open up further business opportunities

Responses	N/A	Yes, I would like to own one to open up further business opportunities	Total responses
Number of Responses	14	1	15

Question 12.e I would replace one or more of my 13.6m trailers with an LST variant instead

Responses	N/A	Yes, I would replace my 13.6m trailers with an LST variant	Total responses
Number of Responses	14	1	15

Question 13. Do you have any further comments/barriers to owning LSTs with no additional regulation? if so please provide them.

Responses	N/A	Very strongly opposed to a 'no regulation' option, & not satisfied with the current 'light regulation' proposal.	Total responses
Number of Responses	14	1	15

Question 14. Are there any other 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?

4 respondents specified other costs and benefits which they believed were not considered by the Impact Assessment such as the impact on local communities, negative safety risks to other road users and environmental costs.

Some of these respondents raised further concerns that the consultation has very low level of non-business costs, which underlines our concern that the true costs of LSTs on local communities are not being properly assessed. Also, that broader health costs, environmental costs and social costs in relation to operating LSTs have not been considered.

One of the respondents added that regulatory measures should be defined according to the cost benefit analysis.

Annex A

Proposed approach to regulating the use of LSTs outside the trial

The proposal being taken forward for implementation of the future operation of LSTs beyond the current trial, is based on option 1 of the consultation. It envisages LSTs being subject to the regulatory framework applicable to conventional trailers of articulated lorries, plus some additional rules.

The combination of standard and additional bespoke rules is designed to facilitate safe and efficient operation, yielding benefits to haulage operators, their customers, the workforce, the environment, the use of the road network and public safety.

To implement this, LSTs are intended to be designated as an improved type of wheeled trailer via a statutory instrument; using powers for special types of vehicle provided under section 44 (1)(c) of the Road Traffic Act 1988 (The “RTA”).

The RTA allows such special types to be exempted from some of the usual requirements for vehicles.

In this case, the exemption would relate to the length of the semi-trailer and vehicle combination, like the trial allowing an extra 2.05 metres to of length (15.65 metres maximum length of the semi-trailer, as opposed to the standard 13.6 metres; and 18.55 metres maximum length of the tractor and trailer combination as opposed to the standard 16.5 metres and the 18.75 metres allowed for lorries pulling full trailers).

Rules relating to over-hang would be considered specifically for LSTs. The position is under review, but it is unlikely that overhangs other than related to vehicle transporters (which might be subject to specific approvals), would be allowed. Extendable trailers would operate and be identified as LSTs even if they could also operate at shorter lengths as well, or could be extended to be longer to transport abnormal indivisible loads.

All other requirements for the operation of conventional semi-trailers would apply. Unlike some other special types this would include the requirement for annual testing and initial plating.

The RTA allows restrictions and conditions to be placed on special types. These would cover the issues identified in option 1 of the consultation, being identified in the statutory

instrument and elaborated in associated guidance. Representative bodies of operators are to be consulted about the draft statutory instrument and the guidance.

If LSTs are operated outside the restrictions or conditions they would be breaching construction and use regulations and section 42 of The RTA. There are existing processes for similar breaches, which include referral of operators by the enforcement authorities to Traffic Commissioners, as well as fines for both operators and drivers (where they are culpable).

It is envisaged that the restrictions and conditions related to LSTs would be monitored in the course of premise visits and other compliance activity, principally by the Driver and Vehicle Standards Agency (DVSA).

Conditions and restrictions on use

The restrictions and conditions related to LSTs would be of five types.

Eligible Operators and Operations

The objective of these conditions is to ensure the operator licensing system can be used to underpin compliance with the rules required for LST operation.

The use of LSTs under these regulations would be restricted to transport wholly within the UK. The type is not allowed in normal service (outside trials) in the EU and there is no requirement for other countries to allow them in general circulation. Access to Northern Ireland would also be dependent on the rules in Northern Ireland, whose authorities are being involved in the development of LST use.

Within Great Britain the use of LSTs would be restricted to:

- the holders of a GB goods vehicle operator licence (any of the three types of standard and restricted goods vehicle licence), when the identity of an LST has been confirmed (electronically) to the Traffic Commissioners as being on the relevant licence prior to first use
- Northern Ireland based operators, if permitted by the Northern Ireland authorities and on condition the identities have been confirmed (electronically) to the Department for Infrastructure Central Licensing Office as being on the relevant licence prior to first use
- specific types of operation (usually empty) including connected with manufacture, testing, driver training and transfers of ownership/operator

An operator in Great Britain may not be allowed to operate any LSTs or may be allowed to operate a restricted number for a period of time, or indefinitely, if a Traffic Commissioner considers it is not appropriate for them to do so, on the basis of their previous operation of LSTs. It is envisaged that the Senior Traffic Commissioner will publish guidance and directions about the operation of this restriction by Traffic Commissioners.

Conditions to inform Traffic Commissioners

The objective of these conditions is to enable tracking of who is operating which LSTs and to increase the traction of the operating conditions and restrictions.

It is envisaged operators would inform Traffic Commissioners of any LSTs on licence via the Vehicle Operator Licensing system (already used for most transactions). They would be required to provide a unique identity reference (which is optional for normal trailers) to assist the monitoring of which LSTs are being used by whom, to reduce the risks of uncontrolled or unsafe use.

The unique identity reference to be used would be likely to be required to be part of the data submitted to DVSA from manufacture/ first use and related to type approval processes.

When an operator intends to use an LST as a type for the first time (outside the trial), they would need to confirm their awareness of and intended compliance with the legal restrictions and conditions on the system, in order for their licence to be flagged as enabling LST operation.

An annual confirmation and reminder to all operators identified as using LSTs is also envisaged to confirm operator awareness of the conditions and restrictions of LST operation.

The proposals for these processes follow the principles for the equivalent proposals at consultation in option 1. However, the way they would work has been developed to maintain their effectiveness whilst making them as time and cost effective as possible for operators and the public authorities.

Conditions related to incident reporting

The objective of these conditions is to allow LST fleet safety performance as a whole to be tracked on an annual basis and to feed into the scheduled implementation reviews, standard for the type of statutory instrument used to implement the new operating regime.

It would be a condition to report any incidents associated with injury (serious or slight) or death in which a combination including an LST was involved, whether incidents took place on public roads, in other public spaces or on private land. This would be done as part of the annual confirmation and reminder. Prompt notification of any fatal incidents would be required. The information would be used primarily by DfT to monitor the safety performance of LSTs. There are existing general processes to record incidents involving injury, but these do not identify LSTs specifically and it is important they are monitored specifically.

A proposed requirement relating to the reporting of all damage only incidents is not being pursued, although the reporting of the most substantial of these incidents (for example where emergency services attended) is under consideration. It would be difficult to verify how comprehensive returns were and would be excessively onerous. Whilst the annual numbers of injury incidents involving LSTs has been low, they would be enough to identify emerging reductions in safety performance which might require a policy response.

Conditions related to routes used and risk assessment

The objective of these conditions is to assist LSTs being used on appropriate routes and for risks to be reduced through prior assessment and feedback. The following four conditions related to route and risk assessment are proposed to apply to the use of LSTs.

Before allowing an LST to operate a fresh route, the operator would be required to undertake a risk assessment of the route the LST would take, to ensure the route proposed is appropriate for an LST to follow. Risk assessment may be documented in route sections, enabling fresh routes to be defined as a combination of existing assessed sections, plus new route sections.

Operators would be required to retain a record of all LST route risk assessments for up to five years. They would be required if requested to do so by the police, DVSA, Office of the Traffic Commissioner (OTC) or Traffic Commissioner to provide the records or records of risk assessments undertaken.

Operators would be required to put in place a system where drivers are able to provide feedback (either before or after a journey has been undertaken) where they believe it is not appropriate for the LST to operate on the route proposed/followed. It would be a requirement that a record of this feedback and response provided by the operator is kept on record for five years.

Operators would be required to undertake an appropriate level of compliance monitoring to ensure LSTs are being operated on the routes set and to take appropriate action where deviations are identified. It would be a requirement that a written record of compliance checks undertaken, the outcome of such checks and the outcome of any action taken retained for five years. This would also require operators to have a protocol to be followed; in the event that the route becomes unavailable (a) with time for planning of alternatives and (b) where the route is closed suddenly, including during a journey (road works, accidents etc).

Conditions related to driver training

The objective of these conditions is to help drivers operate LSTs safely.

Operators would be required to provide drivers operating LSTs with training specifically relating to the driving of the LST design to be operated, before the drivers are permitted to operate LSTs. It would be a requirement that this specific training lasts a minimum of half a day. Where there are different LST designs in a fleet, training would be needed for each design.

It is envisaged that operators would follow an LST training good practice guidance document, when considering what training they would provide to drivers. This would be developed based on practice in the trial.

Operators would also be expected, where a driver of a LST is involved in an incident, to consider whether both the driver involved in the incident and all other drivers entitled to operate LSTs should undertake further training or be provided with information about the incident to minimise the risk of the incident happening again.

The issue of whether to require refresher training is to be considered further.

There may also need to be advice in the guidance that other relevant staff may need appropriate training (transport managers, route planners, job assigners, duty managers who might have to make a decision and direct a driver, in the case of a route closure during the night shift).

Timing and Transitional Arrangements for LSTs in the trial

Depending on parliamentary time and resources, the ability to operate LSTs outside the trial is envisaged to start in January or April 2022.

The extra costs to the operator licensing authorities would be recovered from operators through fees. It is envisaged that an additional or higher fee would be payable by operators with LSTs and this would be implemented as part of a wider adjustment of operator licensing fees.

It is envisaged that LSTs being used in the trial, when the ability to operate outside the trial starts, would be allowed to operate under the trial conditions for a further 12 months. At any time during that period, operators could join the new regime outside the trial. If an LST's operator changes during that period, it is proposed the new operator could then move the LST to the new regime even if they were in the trial.

Routes, risk assessments and driver training undertaken during the trial would be eligible to meet the conditions of the regime outside trial conditions. Any requirements for the retention of records under the new regime, would not apply to periods of operation in the existing trial unless they are being used to meet the conditions of the new regime.

The Department is keeping under review whether to allow any further LSTs to be added to the trial right up until the implementation date of the new regime. The trial is currently open for applications but most of its capacity is already being used.

Annex B

Options included in the consultation

The options for how LSTs should be used in the future discussed in the consultation were:

- do nothing
- unrestricted access to LSTs with a light regulation approach
- unrestricted access to LSTs with a heavier regulation approach
- allowing LSTs to enter general circulation with no additional regulation

Lighter additional regulatory option

This was the department's preferred policy option. It allows the whole of the road freight industry to have unrestricted access to LSTs and therefore make an important contribution to reducing emission levels. The proposed additional regulation beyond that in place for standard 13.6 metre trailers, takes into consideration concerns raised regarding LSTs being operated on inappropriate roads and increasing road safety risk, particularly to vulnerable road users as well as the potential for damage to street furniture.

This option would remove the cap on the total number of LSTs permitted and would allow the market to decide the quantity in operation based on commercial need. To ensure the good safety record of LSTs operated under the trial is built on, this option proposes various regulatory measures of:

- accident reporting to DfT, where there is loss of life, injury (on public or private land) or damage (when on a public highway)
- operators being required to give drivers a minimum of half a day's training in respect to the LST design before a driver operates an LST for the first time. This will need repeating or enhancing if a driver uses another LST design. If providing this training in house, operators will need to have regard to an LST best practice training guide
- operators being required to undertake a risk assessment of the proposed route for a LST, to ensure it is appropriate
- operators being required to retain a record of all risk assessments undertaken prior to LST journeys and make them available to the police, DVSA, OTC or Traffic Commissioners on request

- operators will be required to put in place a system to allow drivers to provide feedback on routes proposed and followed. A record of this feedback and response provided by the operator will be required to be kept on record for 5 years
- operators being required to undertake compliance checks to ensure LSTs are following the routes set and to take appropriate action where deviations are identified. A written record of compliance checks will be required to be kept for 5 years
- operators being required to apply to the traffic commissioner for permission to operate a permitted number of LSTs, as well as:
 - identify (to the Traffic Commissioner) the specific LSTs (using an identifier to be agreed) that are currently in service
 - update that record in a timely manner
- operators being required to ensure that there is a process for managing road closures (planned or emergency) to assist drivers
- operators to have a protocol to be followed in the event that the route becomes unavailable (a) with time for planning of alternatives and (b) where the route is closed suddenly, including during a journey (road works, accidents etc)

Heavier additional regulatory option

This option adds further specific regulations to the previous option. This option would require operators to run each LST on major roads for at least 80% of each journey. In order to achieve this, operators would be required to ensure appropriate route planning is undertaken before each journey. Operators would be required to undertake an appropriate level of compliance checks to ensure this requirement was being achieved.

To ensure compliance with the 80% requirement, operators would be required to be able to accurately track the route LSTs take by GPS and have a system in place to collect and store this data for five years. Operators would be required, should the police, DVSA, or a Traffic Commissioner request such data, to provide the data in the required format to identify whether the 80% requirement is being achieved.

In addition to the training requirements set out in the lighter additional regulation proposal, drivers would be required to also undertake approved LST driver certificate of professional competence (DCPC) training before their DCPC is required to next be renewed in order to retain entitled to operate LSTs.

Operators wishing to operate LSTs over 10 years of age would be required to apply to the traffic commissioner on an annual basis for approval to continue to operate the LST.

Allowing LSTs to enter general circulation

This option proposes that LSTs should be allowed to operate under the same restrictions as standard trailers do, therefore placing no additional regulatory burden on operators. Operators would not be required to apply to the traffic commissioner for specific authority to operate LSTs. They would only be required to make an application to the traffic commissioner if they did not have sufficient capacity on their operator's license and wished to increase the number of trailers operated on the license.

Under this option, drivers operating LSTs would still need to undertake appropriate training, but no minimum time would be put in place for how long such training should last, nor would they be required to have regard to a best practice training guide.

Main effects of lighter and heavier regulatory options

	Light regulatory option	Heavy regulatory option
Number of LSTs permitted	Unlimited	Unlimited
Route planning and management	Undertake and record a risk assessment of the route. Undertake compliance monitoring to ensure LSTs are being operated on the routes set. Put in place a system where drivers can provide feedback	Undertake and record a risk assessment of the route. Undertake compliance monitoring to ensure LSTs are being operated on the routes set and the requirement to operate LSTs at least 80% of the time on major roads. Put in place a system where drivers can provide feedback
Data collection	Retain records of routes, risk assessments, compliance checks etc, for a period of 5 years and make these records available to police, DVSA, OTC or traffic commissioner if requested.	Retain records of routes, risk assessments, compliance checks etc, for a period of 5 years and make these records available to police, DVSA, OTC or traffic commissioner if requested. To ensure operators are complying with the requirement to operate LSTs 80% of each journey on major roads, operators will be required to be able to accurately track by GPS LSTs they operate and have a system in place to collect and retain this data for 5 years. Operators would be required, should the police, DVSA, or the traffic commissioner request such data, to provide the data in a required format to identify whether the 80% requirement is being achieved.
Incident reporting	Operators to continue reporting serious incidents that led to loss of life, injury or damage to the department.	Operators to continue reporting serious incidents that led to loss of life, injury or damage to the department.
LST-specific driver training	Specific driver training prior to operation of an LST required.	Specific driver training prior to operation of an LST required. Approved LST CPC course required to be undertaken before a

	Light regulatory option	Heavy regulatory option
		driver's DCPC is next required to be renewed.
Controls on road type usage	None	80% of each LST journey expected to be undertaken on major roads.
Operator licencing requirements	Specific authority for operators to be able to operate LSTs required from the traffic commissioner.	Specific authority for operators to be able to operate LSTs required from the traffic commissioner.
Construction and use requirements	Same as standard lorries	Same as standard lorries
Utilising existing LSTs	As in the trial or move to new regime	Authorisation required annually from the traffic commissioner in order to continue to operate an LST over 10 years of age

Description of the main differences between the light and heavy regulatory options considered in the consultation.