Opinion: EANDCB validation

Origin: domestic

RPC reference number: RPC-3844(1)-DfT-DVSA

Date of implementation: April 2016



# Guidance for uses of special type vehicles Driver and Vehicle Standards Agency (DVSA)

**RPC rating: validated** 

## **Description of proposal**

The proposal introduced guidance for hauliers on how to operate under special type orders. Special type vehicles are those that do not meet authorised weight regulations, but can be used under the authority of the Road Vehicles (Authorisation of Special Types) Order. As requirements under these orders can be complicated, particularly for hauliers that do not operate exclusively under them, the guidance was intended to ensure compliance in this relatively small sector of the transport industry.

## Impacts of proposal

The BIT assessment estimates that haulage operators would spend approximately six minutes reading the guidance, based on the average time users are recorded accessing its 'gov.uk' webpage. While there are an estimated 4,200 affected businesses that undertake some special type operations, the assessment uses the number of recorded webpage views (7,360) to determine how many have read the guidance. The assessment explains that compliance is usually the responsibility of a Transport Manager (TM) in the haulage industry; using an average TM salary of £19 per hour, and applying this to the total time spent reading the guidance, generates a total cost to business of £15,000 per year. Rounded to the nearest £0.1 million, this translates into an equivalent annual net direct cost to business (EANDCB) of zero.

# **Quality of submission**

The assessment provides a sufficient level of evidence for the RPC to be able to validate an EANDCB of zero. The only direct impact on business identified is the cost of reading the guidance each year; this estimate is treated as a maximum, as the webpage is likely to be viewed by enforcement officers from the DVSA and other agencies with an interest in 'special type' orders. Otherwise, the assessment could be improved in the following areas.

The assessment states that 'the contents of the guidance are all widely available elsewhere... the guide does serve to bring them all together into one place, arguably saving the operator time...' (page 2). The assessment would benefit from considering the cost incurred by businesses reading the old sources of information in the counterfactual, and comparing this to the time spent reading the new guidance

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document. Potentially, this could result in a net saving to haulage operators. However, on balance, the RPC accepts that this is unlikely to affect the rounded EANDCB figure.

To estimate familiarisation costs, the assessment uses the number of recorded webpage views, since its introduction in April 2016, as an estimate of the number of businesses reading the guidance each year. This is described as a maximum, on the basis that other non-business users such as DVSA enforcement officers may be captured by this approach. The assessment would be improved by estimating the cost to haulage operators only, and by considering whether six minutes is representative of the time it would take for users to familiarise themselves with the guidance, making reference to the length of the document.

### **Departmental assessment**

Classification	Qualifying regulatory provision
Equivalent annual net direct cost to business (EANDCB)	Zero
Business net present value	-£0.1 million

#### RPC assessmenti

Classification	Qualifying regulatory provision (IN)
EANDCB – RPC validated	Zero
Business impact target score	Zero

Michael Gibbons CBE, Chairman

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For reporting purposes, the RPC validates EANCB and BIT score figures to the nearest £100,000