

Longer Semi-trailer Trial (LSTT): Questions and Answers

The Department for Transport has actively considered the needs of blind and partially sighted people in accessing this document. The text will be made available in full on the Department's website. The text may be freely downloaded and translated by individuals or organisations for conversion into other accessible formats. If you have other needs in this regard please contact the Department. Department for Transport Great Minster House

33 Horseferry Road London

SW1P 4DR Telephone 0300 330 3000 Website <u>www.gov.uk/dft</u>

General enquiries https://forms.dft.gov.uk

© Crown copyright 2014

Copyright in the typographical arrangement rests with the Crown.

You may re-use this information (not including logos or third-party material) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence, visit

<u>www.nationalarchives.gov.uk/doc/open-government-licence</u> **CGL**or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or e-mail: <u>psi@nationalarchives.gov.uk</u>.

Where we have identified any third-party copyright information you will need to obtain permission from the copyright holders concerned.

Contents

The Allocation Process - Page 5

- Q. How can operators apply?
- Q. What happens at the end of the six weeks?
- Q. How do I provide Proof of Order?
- Q. How many longer semi-trailers can operators apply for?
- Q. Can operators apply for longer semi-trailers of either length?
- Q Will you consider increasing the quota above 1800?
- Q.Why have you changed the allocation process for the Longer Semi-trailer Trial? What was wrong with the old process?
- Q. Is this new allocations process just not a way to get more of these longer semi-trailers in by the back door?

The Trial - Page 7

Q. What are the advantages of LSTs?

The trial is expected to save over 3000 tonnes of CO2 with overall benefits estimated at £33 million over ten years

- Q. Isn't ten years too long for a trial?
- Q. The big operators are going to get a competitive advantage
- Q. You are allowing too many lorries under the trial
- Q. What happens at the end of the ten-year trial?

Safety aspects - Page 9

- Q. Longer semi-trailers are more dangerous for vulnerable road users, so why is the Government pursuing them? What are you doing to make sure that these vehicles are safe?
- Q. Is there any specific safety equipment I need to fit to these semi-trailers?
- Q. Do longer semi-trailers have greater tailswing than standard size semi-trailers?
- Q. Is stability an issue in windy conditions?
- Q. Why are you not requiring that these LSTs carry safety equipment such as side sensors?

Operating the vehicle commercially - Page 11

- Q. I've been provided with a demonstration trailer but I'm told I can only operate it unladen. What's the point of that?
- Q. I am supplying some longer semi-trailers to one of my clients. My client holds the VSO for these vehicles but I don't. Does the delivery count as a movement under STGO and need to be notified two working days in advance, or can I make the delivery under my client's VSO?
- Q. I've heard that one company may be offering spot rental of longer semitrailers so that operators can get commercial experience of them before committing to an order. Is this allowed?
- Q. I have an allocation, but I want the semi-trailers to be hauled on my behalf by a company with its own "O" licence. Is this permissible?

Data requirements - Page 13

Q. Why is the Department insisting on such detailed data returns when all it needs to know is whether the trailers are safe and result in reduced fuel consumption?

Technical queries - Page 14

Q. May I mount a forklift truck on the rear of my longer semi-trailer?

- Q. May I use a lifting axle?
- Q. Is there a limit on the height of the semi-trailers?
- Q. Is it possible to have a step-frame chassis?
- Q. Why have you insisted on three axles?

Vehicle testing and plating – Page15

- Q. Why is the DfT insisting on turning circle tests for these vehicles?
- Q. Will every semi-trailer be tested?
- Q. Are DVSA going to pull my drivers over for having an extra-long trailer?

Driver training - Page 16

Q. The Undertaking requires me to provide appropriate training – what will this be?

Local Authority / access queries - Page 17

- Q. I've received a letter from a Local Authority asking me if I'm going to be operating LSTs on roads in the area, and if so, which. Do I have to give this information?
- Q. I am concerned about the potential impact of these vehicles on our local road infrastructure. Can my Local Authority ban them from our roads?
- Q. Are these vehicles going to be limited to certain types of road?
- Q. Will you be monitoring trials of these vehicles through small communities or on narrow roads?

How we manage the data you provide - Page 18

The Allocation Process

Q. How can operators apply?

Operators who want to apply for a longer semi-trailer or batch of semitrailers from the limited number remaining may submit an application form. The forms and guidance are available here on the DfT website. We will consider the application and share out the remaining allocation accordingly.

We will then issue allocations to operators which will be valid for six weeks (42 days).

Q. What happens at the end of the six weeks?

The Department will need to see either a Proof of Order for the LSTs from the operator, or a VSO issued by the VCA, within the six week period. After that the allocation will automatically expire. We will consider further steps at the end of the six week period.

We only expect operators to bid if they are genuinely ready to place orders for LSTs within the 6 week period and so do not expect any to remain unused at the end of that period. If they are, we may reallocate to those operators whose bids were scaled back and who have taken up the reduced number they were allocated, as they should be best placed to use them more quickly.

Q. How do I provide Proof of Order?

Proof of Order can range from a manufacturer stamped receipt for the LST order to an order acknowledgment form signed by the operator with the manufacturer's stamp to confirm receipt, and containing details such as the specifications and price etc.

We will also continue to accept a VSO instead of a proof of order within the 6 week validity period. VCA will inform DfT when it issues a VSO to an operator, so you should not need to contact DfT when you receive your VSO

Q. How many longer semi-trailers can operators apply for?

Providing that they are ready to use a longer semi-trailer or batch of semi-trailers, operators may apply for as many as they like subject to the amount remaining and condition that they comply with the guidance here to gauge how many LSTs are permissible against their fleet size.

Q. Can operators apply for longer semi-trailers of either length?

Yes, operators may apply for either length or both.

Q Will you consider increasing the quota above 1800?

We are maintaining the original quota at 1800. The aim of this allocation is to get all 1,800 on the road as soon as possible.

Q. Why have you changed the allocation process for the Longer Semi-trailer Trial? What was wrong with the old process?

The initial allocation of 1,800 LSTs were taken up by operators. The increase in allocation is much smaller than in previous allocation rounds.

Our aim now is to get the remaining allocation on the road as quickly as possible. We are using a different process this time as there are relatively few LSTs remaining to be used and we want them to be taken up by operators who are ready to use them now. Hence the single bidding round and short timetable.

Q. Is this new allocations process just not a way to get more of these longer semi-trailers in by the back door?

No. The new allocations process will not increase the total number of longer semi-trailers, which remains at 1800, as it was at the start of the trial in 2012. It will ensure a more efficient allocation of that total numb

The Trial

Q. What are the advantages of LSTs?

The impact assessment published alongside the original 2011 public consultation that preceded the trial indicated that there could be both economic and environmental benefits by using longer semi-trailers.

Fewer journeys needed to transport the same amount of goods means that there would be fewer carbon emissions and also net benefit savings for freight operators. It also means that with fewer lorries on the roads, it would help to ease congestion.

The trial is expected to save over 3000 tonnes of CO2 with overall benefits estimated at £33 million over ten years.

The evaluation of the trial published in June 2014 showed that in the period to the end of 2013, the trial had already saved an estimated 600,000 to 900,000 vehicle kilometres.

Q. Isn't ten years too long for a trial?

In order to gather the operating evidence that we need to test the desk-based research against actual performance, in the light of the concerns raised in the 2011 consultation, it is important to ensure that the trial is properly representative and provides statistically robust evidence. The companies who participate in the trial will be investing in new technology at their own risk. Allowing a ten-year trial will give them confidence that they should be able to recoup the value of that investment.

That said, the trial will be closely monitored to identify any developing trends, and its duration may be reconsidered in the light of emerging evidence.

Q. The big operators are going to get a competitive advantage.

The capping provisions will ensure that the allocation system does not discriminate against small operators.

Q. You are allowing too many lorries under the trial.

It is important to ensure that the trial is properly representative and provides statistically robust evidence. The number of vehicles we have allowed is less than 2% of the existing fleet.

Q. What happens at the end of the ten-year trial?

We do not propose to extend the trial beyond the end of the ten-year period. This period should allow participants to recoup the cost of their investment in the new vehicles.

There are a number of factors that could affect practice and regulation on vehicle weights and dimensions over that period, so there is little point speculating at this stage on what may happen then.

Safety Aspects

Q. Longer semi-trailers are more dangerous for vulnerable road users, so why is the Government pursuing them? What are you doing to make sure that these vehicles are safe?

The comprehensive research undertaken by the Transport Research Laboratory before the trial started indicates that there should be no detectable difference in safety between existing semi-trailers and the longer semi-trailers that we are trialling

Additionally, the longer variation of our longer semi-trailers, at 18.55m including the tractor unit, is 25cm shorter in total length than the longest permitted heavy goods vehicle currently on EU and UK roads.

The trial is being closely monitored to verify the research and is looking closely at any accidents involving longer semi-trailers. If there is no detectable difference in the rate or severity of accidents involving standard length and those involving longer semi-trailers, then this will strongly suggest that the longer semi-trailers are as safe as existing ones – thus confirming the research.

There have been no major incidents reported in the first two years of the trial. There have been some minor incidents, but some of these may well have happened whatever the length of the semi-trailer, or be due to unfamiliarity with the new configuration.

More information is included in the second annual report on the trial, which was published in June 2014. This showed that the longer semi trailers had a much lower rate of injuries per kilometre travelled than the whole population of articulated HGVs in Great Britain. While there may be specific reasons to explain the lower rate, this suggests that the LSTs are at least as safe as standard HGVs.

Q. Is there any specific safety equipment I need to fit to these semi-trailers?

The Department does not require any specific safety fitments on these trailers beyond those that are already in legislation. We have not stipulated that operators in the trial must use any additional safety features to those of standard sized trailers since this could skew the results of the study when comparing data with standard length semi-trailers

Q. Do longer semi-trailers have greater tailswing than standard size semi-trailers?

The degree of tailswing is likely to depend on the axle configuration. In practice, a variety of different axle configurations are in use.

Whilst we are aware there could be increased tail swing of up to 0.74 metres, the longer semi-trailers still need to comply with manoeuvrability requirements set out in national Construction and Use legislation. There are currently several vehicle types already in circulation that potentially exhibit similar characteristics.

The worst case identified in the TRL research was still within the performance of other types of road vehicle.

Q. Is stability an issue in windy conditions?

Drivers of any high-sided vehicle should always take extra care in high winds. There is a small increase in the risk for the longer semi-trailers in those conditions if they are returning empty or carrying a very low-mass load, but this should be partially offset if steering axles are fitted, because of their greater weight. We are not aware of any such incidents so far.

Q. Why are you not requiring that these LSTs carry safety equipment such as side sensors?

The purpose of the trial is to gather firm evidence on the way in which these lorries are used and their impact on the environment and safety. It is therefore important not to place any requirements on these vehicles beyond those that already exist for heavy goods vehicles, as this would invalidate the trial results. However, should operators choose to fit their trailers with this type of equipment, the Government would welcome this as an additional source of data.

Operating the vehicle commercially

Q. I've been provided with a demonstration trailer but I'm told I can only operate it unladen. What's the point of that?

There are two ways in which the longer semi-trailers can legally circulate on British roads. Some of the manufacturers are providing demonstration vehicles under the "Test or trial" provisions of the Special Types (General) Order 2003 (STGO) which do not permit commercial operation, or the carrying of any load other than ballast for trial purposes, to replicate the conditions in which the vehicle would operate in service.

If the semi-trailer has been provided for a trial of commercial operation, the operator will need to apply to VCA for a Vehicle Special Order (VSO) to operate that longer semi-trailer commercially. The VSO will identify the semi-trailer by its VIN. When the operator returns the semi-trailer or acquires further ones, this must be notified to VCA who will revoke the original VSO and issue a replacement.

Q. I am supplying some longer semi-trailers to one of my clients. My client holds the VSO for these vehicles but I don't. Does the delivery count as a movement under STGO and need to be notified two working days in advance, or can I make the delivery under my client's VSO?

The VSO states "The semi-trailers shall be operated only by, or on behalf of, XX ("the Operator")". You should satisfy yourself that the vehicles are being driven on behalf of the operator before delivering them under the VSO. Suppliers and Operators may wish to seek their own independent legal advice on this point.

Q. I've heard that one company may be offering spot rental of longer semi-trailers so that operators can get commercial experience of them before committing to an order. Is this allowed?

Yes, this is allowed, but the vehicle will count against the operator's allocation for the time that the operator is trying it out. Only a company that has a confirmed allocation from the Department for Transport can apply for a Vehicle Special Order to operate commercially. Manufacturers have no rights to a VSO under the trial.

The VSO states "The semi-trailers shall be operated only by, or on behalf of, XX ("the Operator")". If a manufacturer has offered a spot rental, it will be for the operator to apply for a VSO to operate that longer semi-trailer commercially.

The VSO will identify the semi-trailer by its VIN. When the operator returns the semi-trailer or acquires further ones, this must be notified to VCA who will revoke the original VSO and issue a replacement.

Q. I have an allocation, but I want the semi-trailers to be hauled on my behalf by a company with its own "O" licence. Is this permissible?

Yes – the VSO states "The semi-trailers shall be operated only by, or on behalf of, XX ("the Operator")". As long as the haulier is operating the vehicles only on behalf of the holder of the VSO, this is allowed under the trial.

Data Requirements

Q. Why is the Department insisting on such detailed data returns when all it needs to know is whether the trailers are safe and result in reduced fuel consumption?

While these are the highest-profile issues to be resolved through the trial, there are other aspects as well on which the Government is looking to the trial to validate the assumptions in the original report. These include possible effects if the number of longer semi-trailers introduced is significantly higher than that predicted by the research; the impacts of longer semi-trailers on road infrastructure and design and on depot and distribution centre infrastructure and design; and the impacts on SMEs of allowing longer semi-trailers.

The calculation of fuel saving has to be made with reference to the loading factor of the vehicle. It is the way in which the vehicle is used that produces the improved efficiency – on a straight mile-per-mile comparison, a 15.65m articulated vehicle is unlikely to show lower fuel consumption than a 13.6m articulated vehicle. The savings are made at the point where the additional loading capacity brings a reduction in lorry miles.

The fields in the journey log have been selected to enable the monitoring to check whether the vehicles are being used for different types of operation to those assumed in the research, whether the type of goods being carried matches the assumptions of the research, and whether the loading factor of the vehicle converts to reduced fuel consumption per tonne.

Although the data collection may appear complex, it has been designed to be readily retrieved from normal operational planning systems. The participants with the largest number of vehicles are very likely to have telematics systems that can download the data automatically. The companies that do not have access to telematics systems are likely to have a relatively smaller pool of the longer semi-trailers. The only assumption we have made is that everybody in the trial will have access to a computer that runs Microsoft Excel, a printer that can print an A3 sheet of paper and access to the Internet.

Technical Queries

Q. May I mount a forklift truck on the rear of my longer semi-trailer?

No. One of the conditions of the VSO is that there may be no rearward projection in relation to a load carried by a vehicle combination. This is to ensure that the vehicle combination will not exceed the length of 18.75 metres permissible for a rigid truck / drawbar trailer combination vehicle.

Q. May I use a lifting axle?

Yes, lift axles which automatically deploy when adjacent axles approach their load capacity (provided that they comply with current legislation for such axles and meet turning circle provisions in the deployed state) are permitted.

Q. Is there a limit on the height of the semi-trailers?

No, they can be single-deck, high-cube or double-deck as required.

Q. Is it possible to have a step-frame chassis?

Yes, as long as it can meet the turning circle requirements. The VCA has already cleared several step-frame chassis for operation.

Q. Why have you insisted on three axles?

We took the standard 44-tonne articulated heavy goods vehicle as our starting point for the trial. We assumed that operators will wish to maximise the potential load, within the overall permitted gross vehicle weight of 44 tonnes, and have therefore specified the number of axles that permits this.

Vehicle Testing and Plating

Q. Why is the DfT insisting on turning circle tests for these vehicles?

The provisions on "deemed compliance" in the existing regulations for semitrailers cannot apply to these vehicles as they do not meet the parameters to which the "deemed compliance" refers.

In order to demonstrate that longer semi-trailers comply with the physical turning circle provisions set out in, or referenced under, the technical provisions for the trial, a certain amount of model testing is necessary.

Q. Will every semi-trailer be tested?

No. The Vehicle Certification Agency does not need to test every single trailer - it just needs to test representative types in order to produce Model Reports that can be used to provide reference data for other trailers of that type.

Q. Are DVSA going to pull my drivers over for having an extra-long trailer?

DVSA are fully aware of the trial and will not be targeting the longer semi-trailers for enforcement. Operators may nonetheless wish to provide their drivers with a copy of the VSO to carry in the cab in case of any queries.

Driver Training

Q. The Undertaking requires me to provide appropriate training – what will this be?

The Department for Transport has deliberately not specified any training requirements as these are likely to vary between operators. However, aspects that have been identified by some of the trial participants relate to low-speed manoeuvring, including driver awareness of the risk to vulnerable road users from increased kick-out and rear overhang.

The Department welcomes feedback from trial participants on any particular training needs they identify from their own experience with these longer semi-trailers.

Local Authority / access queries

Q. I've received a letter from a Local Authority asking me if I'm going to be operating LSTs on roads in the area, and if so, which. Do I have to give this information?

Under the trial, the only requirement on notification of route is where the vehicle is being moved under the "Test or trial" provisions of the Special Types (General) Order 2003 (STGO), which do not permit commercial operation. In these circumstances the company concerned needs to provide two clear working days' notice of the routes concerned to all the police forces along the route. The Department recommends contacting the local Police Force's Abnormal Loads Officer, who will be able to advise on the notification process. Once the vehicles are operating commercially under a Vehicle Special Order there is no obligation to notify anybody of the routes involved, but if an operator has major distribution centres or clients within the area covered by the Local Authority that sent the letter, that operator will have an interest in showing a reasonable level of co-operation. This could particularly be the case if there are known to be existing concerns over the use of 44 tonne articulated vehicles on roads in that area. In those circumstances it may be helpful for the company to advise where it expects to use the longer trailers.

Q. I am concerned about the potential impact of these vehicles on our local road infrastructure. Can my Local Authority ban them from our roads?

Local Authorities have powers, subject to undertaking consultation, to issue Traffic Regulation Orders (TROs) that restrict vehicular access on the grounds of height, weight or length. However, the longer semi-trailer vehicles are within the maximum permitted length for other types of goods vehicle and comply with all the relevant requirements of Construction & Use Regulations. So we see no justification for imposing more stringent restrictions on them than already exist for 44-tonne goods vehicles.

The operators taking part in this trial know that longer semi-trailers will not necessarily be appropriate for all the routes they use. Many of them have already indicated that they intend to use them chiefly for trunking – in other words, taking loads between distribution centres that are generally based close to the major road networks. These are not "abnormal loads" – they are within the 44 tonne Gross Vehicle Weight limit, less than 18.75 metres long and 3 metres wide, and the axle load does not exceed 11.5 tonnes. Moreover, they are being tested to ensure they meet the turning circle requirements of the Construction & Use Regulations.

Q. Are these vehicles going to be limited to certain types of road?

The longer semi-trailers operating under Vehicle Special Orders (VSOs) will be subject to any existing restrictions that apply to 44-tonne lorries. We see no justification for imposing any additional restrictions on them, as they are within the maximum permitted length for other types of goods vehicle and comply with all the relevant requirements of Construction & Use Regulations.

Q. Will you be monitoring trials of these vehicles through small communities or on narrow roads?

The trial will be monitored to identify any incidents, which we would expect to include vehicles being stuck at junctions or having difficulty negotiating tight corners. However, this will be done through the obligation on the trial participants to report any such incidents in the course of their normal operations. This will provide the Department with evidence of whether or not the longer vehicles are being used on roads to which they are unsuited.

It's not in operators' interests for their vehicles to get stuck or to risk hitting roadside objects, so if a company knows that a particular route is difficult for a standard articulated vehicle to negotiate, it is likely to think carefully before trying to operate a longer vehicle there. A number of companies are carrying out assessments of their delivery routes and their customers' facilities to make sure they do not schedule the longer vehicles along routes or to sites where the additional length is likely to cause problems.

How we manage the data you provide

The personal data you provide is purely for the use of this trial. We will not be share your information with anyone else and it will be disposed of when the trial concludes.

Department for Transport privacy policy: www.gov.uk/dft/privacy-policy