Direct Vision Standard (DVS) frequently asked questions
**Background**

**What is the Direct Vision Standard (DVS)?**  
The DVS is a methodology that allows for the objective and standardised measurement of a driver’s direct visibility from the cab of any heavy goods vehicles (HGV). This is converted into a simple star rating from zero (poor) to five (excellent), which indicates the level of risk to vulnerable road users (VRUs) near to the vehicle.

This rating system can be used to identify which HGVs provide sufficient direct vision to operate on city streets without needing to be modified.

**What is the HGV Safety Standard Permit (HSSP) Scheme proposal?**  
This uses the DVS methodology to develop a practical regulatory proposal for use in an urban environment. Under the proposal, HGVs over 12 tonnes would require an HSSP to enter or operate in Greater London. In addition, it is proposed that HGVs rated zero star in 2020 (or two stars or below in 2024) will be required to operate in accordance with safe system permit conditions to increase their safety, or be banned from London if they do not.

**What are the proposed introduction dates for the HSSP?**

- **2019:** HSSP issuing commences, Scheme ‘go-live’
- **2020:** all zero star HGVs will be banned unless they prove they can operate a safe system (see page 5), with the enforcement launch date to align with the proposed expansion of Ultra Low Emission Zone (ULEZ) emission standards to heavy vehicles
- **2024:** all zero to two star rated HGVs banned unless they prove they can operate to an updated or a ‘progressive safe system’

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1 This timetable is subject to completion of the necessary statutory consultations and other relevant procedures/processes, including Department for Transport and European Commission support.
DVS star ratings

What happens to my star rating if my vehicle is modified after build?
The DVS rating is assessed and applied to a vehicle as it leaves the factory, even if this is a multi-stage build vehicle to be completed by a bodybuilder. If the vehicle is subject to significant changes that might affect its DVS rating, these may need to be declared.

We are working on a process to address significant alterations that impact the star rating. While this is being worked on, anyone affected is advised to contact DVS@tfl.gov.uk

Why are star ratings only available for Euro VI HGVs?
Under London’s ULEZ proposals, HGVs and other heavy vehicles will be required to meet minimum Euro VI exhaust emission standards from October 2020. Therefore, the star rating of Euro VI HGVs has been prioritised and the results are now available from vehicle manufacturers.

How do I know if older vehicles comply?
We are working with manufacturers to rate older Euro IV and Euro V HGVs, which may continue to operate in the Greater London area under certain conditions. Once finalised, the star ratings will be available from vehicle manufacturers.

Will the star rating of my vehicle change depending on the load?
The height of your vehicle will change depending on the load. Manufacturers will calculate the average between the highest possible and lowest possible height for your vehicle type, which will be used to determine its final star rating.

Will the manufacturer record the star rating of my vehicle?
Yes, manufacturers will record the star rating for each of their HGV models and send a copy to us.

HGV safe system

What is a safe system?
Vehicles that do not meet a sufficient DVS rating to operate in London will be granted a HSSP that has conditions requiring the vehicle meets a safe system of additional measures designed to increase safety and reduce road risk. These measures will be contained in ‘safe system permit conditions’ attached to the HSSP of all vehicles rated zero star in 2020 (from 2024, those rated two stars or below). Failure to implement the required measures will result in the vehicle being banned from working in Greater London.

The first review of the safe system is scheduled for 2024. Operators and affected stakeholders will be consulted on the proposed updated requirements nearer the time.

What will the safe system measures be?
The precise requirements of the initial safe system applying in 2020 will be subject to further consultation with operators, stakeholders and the public (Phase 2b is due in early 2019). However, it is likely to require zero star HGVs to be fitted with camera monitoring systems, Class V and VI mirrors, sensor systems, driver alerts, vehicle signage and side-guards meeting applicable European Union and United Nations Economic Commission for Europe regulations.

Compliance with safe system vehicle requirements will be assessed as part of the HSSP application process. It will also recommend that all drivers (including those currently exempt or not in scope of Driver Certificate of Professional Competence) should undergo specific training on:

- The safety of VRUs
- The use and limitations of supplementary vehicle safety equipment

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2 A statutory consultation on these proposals ran between 30 November 2017 and 28 February 2018. A decision by the Mayor on whether to confirm them (with or without modifications) is expected by summer 2018.
What will the application processes be for the HSSP Scheme?
We ran a consultation (Phase 2a) on initial proposals for the HSSP Scheme between 16 November 2017 and 24 January 2018. More information can be found at: consultations.tfl.gov.uk/roads/direct-vision-standards-phase-2/. We are currently analysing responses to that consultation, which will feed into the development of the final design of the HSSP Scheme.
Details of the final Scheme proposals, including safe system permit conditions and how the HSSP application process will be administered, will be contained in a further round of public and stakeholder consultation (Phase 2b). Details of the safe system requirements will be finalised before HSSP are available.

When can I apply for a HSSP?
It is proposed that HSSP will be available from the end of 2019. Further information will be communicated in due course as part of the Phase 2b consultation.

How will the HSSP Scheme be enforced?
It is proposed the HSSP Scheme will be introduced under highway safety traffic order powers3 and will operate 24-hours a day, 365 days a year from 2020 on all roads within the Greater London boundary.
All HGVs more than 12 tonnes will be required to have a HSS permit to work in Greater London. Where a vehicle is subject to safe system permit conditions, it must be operated in accordance with those requirements.
Any contravention will attract a per-vehicle penalty of £550 (operator/haulier) and £130 (driver) enforced by the issue of a civil penalty charge notice (PCN). The PCN is reduced by 50 per cent if paid within 14 days.

How would HGVs be checked for HSS permits?
The HSS permit application process will provide details of the HGV’s vehicle registration number (VRN), star rating, and ownership/operator. This will be used to build a database of the VRNs of all HGVs over 12 tonnes, including those subject to safe system permit conditions.
It is proposed that our Automatic Number Plate Recognition (ANPR) camera networks on the Low Emission Zone (LEZ) and Congestion Charge boundaries will be the primary enforcement mechanism to identify any HGVs more than 12 tonnes operating in London without a HSSP.
The system would automatically issue a PCN to the operator or haulier and, if details are available, to the driver. Compliance with the HSSP Scheme can be checked by VOSA and its MOT testing centres when a vehicle has its MOT and is something the Traffic Commissioner can take into account when undertaking its licensing functions. The police will also have the power to check for compliance when they pull a vehicle over for road-side inspections and checks.

3 The 1985 traffic order that established the London Lorry Control Scheme (LCCS) is the proposed legal implementation mechanism for the HSSP Scheme.
DVS star rating process for Euro VI HGVs

How do I get my DVS star rating?
Firstly, email your manufacturer (see table below) to request a DVS star rating for your existing Euro VI vehicle(s) or to enquire about the rating of a new vehicle. You will need to supply information on your existing HGV, which could include the chassis number and age of your vehicle(s).

Your manufacturer will calculate the star rating of your vehicle(s) based on the approved technical protocol. They will then advise you of your DVS star rating(s). We will also keep a record of your star rating and a formal confirmation will be sent to you once the permit scheme proposals have been through the final consultation process.

Manufacturers are expected to receive a large number of enquiries, but will aim to respond to you within 10 working days.

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<tr>
<th>Manufacturer</th>
<th>Name</th>
<th>Phone</th>
<th>Email</th>
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<tbody>
<tr>
<td>DAF</td>
<td>DAF Central Engineering</td>
<td>01844 261111</td>
<td><a href="mailto:ukwvta@daftrucks.com">ukwvta@daftrucks.com</a></td>
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<td>Dennis Eagle</td>
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<tr>
<td>MAN</td>
<td>Sales Engineering for MAN Truck and Bus UK</td>
<td>01793 448000</td>
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<td>Product Engineering</td>
<td>01926 401777</td>
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<td>01926 401777</td>
<td><a href="mailto:dvs@volvo.com">dvs@volvo.com</a></td>
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Others

Does the DVS take into account left-hand drive vehicles?
Left-hand vehicles have better direct vision of the kerbside, but the offside direct vision is equally impaired. As such, the DVS for HGVs in the UK is correspondingly mirrored to reflect the offside blindspot of left-hand drive vehicles.

Does the standard take into account the additional visibility owing to retrofitted additional windows?
Retro-fitted windows are not be included in the DVS rating as these have not been subject to the same testing and vision measurement as the original equipment windows. Factory-fitted windows have been assessed in the same way as other vehicle systems.

How much does a permit cost and how long will it last?
We are still working on the administrative process. More details will be available as part of the next consultation phase.

Who do I contact if I have any questions relating to DVS or HSSP Scheme proposals?
If your manufacturer can’t answer your question, please contact DVS@tfl.gov.uk.

Will there be an appeals process?
Yes, an appeals process will be included in the final scheme proposal.

What do I do if my manufacturer isn’t listed?
If your manufacturer isn’t listed, please contact DVS@tfl.gov.uk.