



Department
for Transport

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Our Ref: MC/141198

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Penelope A Schofield
Senior Coroner
Coroner's Office
West Sussex Record Office
Orchard Street
Chichester
West Sussex
PO19 1DD

Dear Ms Schofield,

Thank you for your letter of 31 July, enclosing a Regulation 28 Report on the investigation into the death of Ms Giuseppina Incisivo. On conclusion of the inquest you made a finding that the size and the shape of the mirror gave insufficient visibility, and the lack of secondary 'front obstruction' warning systems, such as sensors or a forward facing camera with a screen in the cab, could have prevented the collision. Another factor is that pedestrians may be unaware that the driver cannot see them clearly, putting themselves at risk.

I am replying as Head of International Vehicle Standards Division of the Department for Transport, which has responsibility for road vehicle safety standards. I would like to reassure you that the Department takes the safety of all road users very seriously and I will endeavour to explain the current legislation on vehicle construction matters and the steps being taken to address your concerns.

As you are aware, the technical requirements for new vehicles are set at international level by both the United Nations (UN) and the European Union (EU). The UN Regulation 46 sets the requirements for mirrors and is very similar to EU Directive 2003/97/EC which you mention in your report. The requirement in both these sets of legislation is for the driver to be able to see a ground plane area, and in the case of the area directly in front of the vehicle manufacturers can decide whether to use a mirror or a camera to cover this. Their choice will depend on which products their customers require and their specific design as well as cost. In future it will be possible for manufacturers to replace all mirrors with cameras.

Engineers in my team are working at both national and international level to improve the safety of HGVs. Consideration is being given in EU Working Groups to improving direct and indirect vision for drivers, which we anticipate will help to prevent future collisions with vulnerable road users. We are also working closely with Transport for London (TfL) on safety measures. Research by the Transport Research Laboratory for TfL on a range of technologies which can be fitted to HGVs to detect pedestrians and cyclists is currently being peer reviewed, and this could form the basis of advice to manufacturers and operators, in advance of changes to approval regulations for new vehicles being agreed in the EU.

Although sensor technology is available to identify objects around a vehicle, the technology has not yet developed sufficiently to distinguish between people and street furniture or other vehicles. As the technology improves this may offer a solution in future.

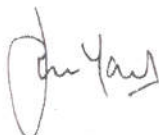
You have correctly identified that there is also a role for pedestrians in understanding when it is safe to cross in front of a vehicle. You may be aware that adult (60+) pedestrian casualties have shown a steady decline in recent years. However, in 2014, the latest year for which statistics are available, there were still 191 fatalities and we are not complacent about this issue. The Department issued revised guidance in January 2014 aimed mainly at local traffic authorities who are responsible for setting speed limits on local roads. It has been designed to help explain to everyone why and how local speed limits are determined. This guidance was revised following full public consultation in summer 2012.

Pedestrian walking speeds and crossing timings are matters for guidance rather than legislation, and the Department will be considering how best to update the guidance. I can confirm that we intend to produce a new chapter of the Traffic Signs Manual on traffic lights and pedestrian crossings, bringing together and updating existing advice. Unfortunately we are unable to give a precise date for publication.

The Department is supporting the Living Streets organisation, who are campaigning on the safety of older pedestrians and are the UK charity for everyday walking; I attach their website link <http://www.livingstreets.org.uk/make-a-change/take-action-with-us/crossings>

I will also bring this case to the attention of road safety colleagues in the Department to find out what more can be done, to raise awareness of drivers and pedestrians of the risks when they are in close proximity to one another.

I am grateful to you for raising this incident with me, and would appreciate you conveying my condolences to Ms Incisivo's family.



[REDACTED]
Head of International Vehicle Standards Division