

# Longer Semi Trailers

## Briefing note

Following a successful trial period that lasted between 2012 and 2023, involving over 2,500 trailers and 300 operators, Longer Semi Trailers (LSTs) are now being introduced into general use. As a new vehicle type, LSTs have specific regulations, which are laid out in the *Road Vehicles (Authorisation of Special Types) (General) (Amendment) Order 2023*. This briefing note will cover the main points required to operate LSTs.

## Definition and background

Longer Semi Trailers (LSTs) are a type of heavy goods vehicle trailer with a permitted length of up to 15.65m. These are 2.05m longer than the current standard semi-trailers encountered on our roads. While the additional length increases the loading area, they must still comply with both the domestic authorised weight limit of 44t and pass the same turning circle test that standard semi-trailers are subjected to during approval. For this to be achieved, a steered rear axle must be used. This type of vehicle has been defined as a special vehicle type under Section 44 of *The Road Traffic Act 1988*.

With the additional length taken into consideration, the maximum length of a vehicle combination, which consists of an articulated tractor unit and LST, is 18.55m. An LST must exceed 13.6m, and any load carried by this type of vehicle must not have a rearward projection.

All LSTs must have three axles, and as previously mentioned, the rear axle must be a steered axle. There are different types of steering systems for LSTs, each with different characteristics:

- Self-steer; a passive system that turns in response to the direction of the vehicle to assist with cornering.
- Command, or forced steer; this system reacts to the turning force of the relative motion between the hauling unit and trailer using hydraulic cylinders to turn the axle.
- Active steer; this system uses a computer to calculate the turning angle required based on information from a sensor at the fifth wheel, activating cylinders connected to the trailer axle.

When a combination utilising an LST with a combined maximum authorised mass (MAM) exceeding 38t, the trailer must have an on-board weighing system. They are also required to comply with all other regulations which apply to standard semi-trailer use, this includes plating and testing requirements.

During the consultation period, consideration was raised over the level of regulation required to use these trailer types. As part of the outcome, it was stated that the *Department for Transport (DfT)* considers that the *lighter regulatory option is the most appropriate option to progress.*

## Enforcement

If the combination does not meet the definition of an LST, then enforcement officers will apply the standard *Construction and Use Regulations* surrounding length. If this operation is undertaken without meeting the requirements of the regulations, it would be considered a breach of Section 42 of *The Road Traffic Act 1988*.

Action will be taken, in line with the DVSA guidance document *Enforcement Sanctions Policy*, which can include financial penalties for both operators and drivers. Enforcement officers could also refer operators to the relevant Traffic Commissioner for further investigation, which could lead to questions regarding good repute.

## LST operation

To operate LSTs under the new regulations, operators will need to take a number of actions before using an LST on the public road. Fulfilling these conditions is a legal requirement and failure to do so will lead to enforcement action as mentioned above.

Operators who have taken part in the LST trial are subject to different requirements, until the conclusion of the trial. These are set out in *Transitioning from the LST trial* below.

## Notification of use

The legislation states that the Secretary of State for Transport must be notified of an intention to use an LST on the road. DVSA

will act as the point of notification on their behalf and must be notified before an LST is first used on a road by an operator. The legal requirements are that this notification must be made by electronic communication, and specify the following:

- Name of the operator.
- Address of the operator.
- Where the operator holds an operator licence, the number of that licence.

This notification will take place via the existing vehicle operator licence (VOL) system, and where an operator of an LST does not have an operator licence, the DVSA can be notified by email at [reo@dvsa.gov.uk](mailto:reo@dvsa.gov.uk).

There is an exemption to the notification requirements where the longer semi-trailer has been in the operator's lawful possession for less than one month. In this instance, they are not required to notify DVSA. This is intended to cover most non-standard uses such as unladen LST movements in connection with transfers of ownership/operator, manufacturing and sales, and some specific maintenance and testing purposes. DfT has clarified that examples of scenarios for maintenance and testing purposes would include:

- Unladen movement of LSTs that are undergoing repair or modification by a third party.
- Unladen movement of second-hand LSTs by trailer retailers, for the purposes of annual testing prior to sale.
- Movement of LSTs under Section 67 of *The Road Traffic Act 1988*, which permits DVSA vehicle examiners to drive a vehicle for the purposes of testing.

At present, the requirement to notify the DVSA is expected to end five years after the regulations come into force, at which point guidance will be reviewed.

## LSTs in Northern Ireland

LSTs that are authorised for use in Great Britain cannot be used in Northern Ireland unless they have been authorised in advance by the Department for Infrastructure in Northern Ireland. Operators who wish to operate LSTs in Northern Ireland should contact the Department for Infrastructure at: [vehicle.standards@infrastructure-ni.gov.uk](mailto:vehicle.standards@infrastructure-ni.gov.uk) for further advice and guidance. This process can take up to six months to complete, so operators should bear this in mind when applying.

## Route Planning and established routes

To comply with the regulations, a route plan must be in writing, either digitally or on paper, and specify the road or roads on which the LST is to be used in order to travel to and from its destination. While neither DfT nor the regulations have prescribed a universal format for route plans and risk assessments, they should be suitable and sufficient, which is in line with the *Health and Safety at Work Act*. DfT have produced a basic template for route plans and risk assessments.

These route plans and risk assessments should be proportionate to the size and scale of the operation, taking into consideration the number of vehicles and trailers involved. Consideration should be given to the types of roads, locations, and other traffic likely to be encountered along the route where these trailers are to be operated. Special focus will need to be applied to smaller roads, such as motorway exits and lesser roads with tight turns. A copy of the route plan and risk assessment for an established route **must** be carried in the motor vehicle towing the LST when in use on that route.

The Regulations refer to 'established routes'. This is a route which is specified on a legally compliant route plan, and for which a legally compliant risk assessment has been completed. Each route will require its own plan, however the route may be split into segments, such as when a LST is used on a particular stretch of the strategic road network. These segments can be combined to create a new route plan. This means that the whole route does not need to be reassessed each time, only the new elements that have not been previously defined. Core elements for a route plan might give the driver:

- The routing information; this could be turn by turn instructions, a map or a suitable pre-loaded navigation device.
- Information on specific hazards on the route; this can include advice on managing the risk, including:
  - How to approach a particular turn or access a difficult site.
  - Locations where advice may be to occupy two lanes.
  - Locations where parked cars are an issue.
- The potential to give feedback on the suitability of the route for LSTs and any additional hazards encountered that may need adding to the assessment.

Where possible, it may be appropriate that multiple route options are assessed and approved for a single destination, with final route choice being made depending on traffic conditions. Diversions from approved routes are covered in more detail in a later section.

## Risk Assessment

To comply with the regulations, a risk assessment must be completed in writing, either digitally or on paper. It must provide a suitable and sufficient assessment of the risk when using the LST on the route or routes specified on the route plan. It must also consider personal injury and injury to any animal, and damage to any vehicle and any other property. It must conclude, in the light of those risks, that the route is one on which it would be reasonably safe to use an LST.

A risk assessment must consider all relevant risk factors, including the following:

- The suitability of the section of road on which the longer semi-trailer is to be used on the route.
- The available manoeuvring space at any road junction at which the LST is likely to turn as part of the route.
- The likelihood that the presence of other road users on the route will cause difficulties in manoeuvring the LST; this should include pedestrians, cyclists, and horse riders.

Records of risk assessments and route plans must be kept for two years and should be available on request by enforcement officers or a Traffic Commissioner for review. While not specified as a requirement, driver feedback and actions could also be kept as best practice, although it is expected that a process is in place to implement any required changes.

## Verbal communication of route plans and risk assessments

Following feedback from Logistics UK members and other stakeholders, DfT have confirmed that verbal communication of route plans and risk assessments would be permitted, provided that the driver was still able to produce the written copies, either digitally or on paper.

If this option is chosen by operators, the drivers must be able to recall any specific risks given to them within the verbal

communication, and it may be appropriate that the driver is requested to review the written copies. If a driver fails to understand the entirety of the route plan and risk assessment, the operator will still be liable for any issues.

## Diversions

The operator needs to be able to safely use both established routes, as covered above, and diversionary routes. There will be occasions on which an established route becomes unavailable, such as an accident closing part of the route. If this happens, the operator will need either to use a diversionary route, or utilise standard trailers to move the load.

A diversionary route includes roads or parts of roads which are not on an established route. Any diversionary route must ensure that the LST can reach or return to an established route as soon as reasonably practicable and must be safe for that purpose.

Diversionary routes may be used in place of established routes when an established route is either prohibited, or where the use of an LST is likely to be subject to unreasonable traffic delays because of an accident or other obstruction on that established route. These diversionary routes may be used for a period of up to seven days.

In most cases, diversionary routes are expected to be used due to problems experienced while driving on an established route, however, there may be cases where a problem on a route is apparent before the LST begins its journey. When this happens, operators should use an alternative established route if it is reasonably practicable to do so. Where it is possible to specify the diversionary route on a route plan, and to complete a risk assessment for it, thus creating an established route, then this should be done. Only if neither of these options is reasonably practicable should a diversionary route be used. DfT have produced a template for a diversionary route checklist.

## Route compliance monitoring

Operators should be able to demonstrate a robust process to confirm all journeys can be undertaken via assessed routes and that they instruct drivers to follow only assessed routes. These checks need to be appropriate for the scale and complexity of the operation but must inform relevant managers about levels of route compliance. This means that where drivers are found not to be complying with the planned routing, there should also be clear process including corrective action.

## Driver training requirements

While specific driver training is not an explicit requirement under the regulations, operators are strongly encouraged to ensure that drivers are appropriately trained in the use of LSTs as part of their general duty to ensure the safety of operations and staff. Good practice is that drivers should have had appropriate LST specific training and familiarisation, relevant to the LST type they will be driving before a driver uses the trailer. Written advice notes may complement but will not replace training. Where a driver transfers employer or is provided by an agency, the new operator should verify that relevant LST training has taken place or else ensure it is provided.

It is expected that training should last for a minimum of half a day and can be made up of classroom or computer-based instruction

and on-road instruction and supervision. When classroom or computer-based instruction is delivered, this should be delivered by an organisation accredited to provide Driver Certification of Professional Competence (DCPC) training and can be built into an approved DCPC course. Practical training may be provided by the operator or other organisations.

Below are some considerations when designing LST training and what drivers should be trained to expect:

- Appropriate loading, overall and individual axle limits.
- Types of LST and the differences between them, including handling differences.
- The extent of additional tail swing vs. standard trailers.
- Requirements to carry route plan and risk assessment in the vehicle.
- Importance of following the planned route and incident reporting.
- Diversionary routes and related company procedures, including feedback on additional hazards.
- The role of the Traffic Commissioners in monitoring compliance.

Training should reflect the nature of the routes likely to be used, as well as the familiarity of drivers with their routes, frequency with which they use LSTs, and whether they switch between standard trailers and LSTs in a single shift. If drivers only operate LSTs infrequently, this should be taken into consideration with relevant refresher training undertaken if required.

## Driver training record keeping

LST operators should be able to show the Traffic Commissioner or other authority both their process for driver training and evidence of its use, on an ongoing basis. Records should be retained for two years. These records should be sufficient to include the following evidence:

- Training plans, including any materials used.
- Individual driver LST training records, including type of LST trained to drive if multiple types are in operation.
- Only trained drivers are operating LSTs.

## Driver awareness

Additional regulations have been designed to allow the widest possible use of LSTs, while reinforcing that they are different from standard trailers. Drivers need to be aware that LSTs are different and how this affects them and their employer.

Drivers **must** be provided with copies of the route plan and risk assessment for any journey they are undertaking using an LST. These **must** be carried in the cab.

## Wider staff awareness and training

The LST regulations make note of the need to consider relevant awareness and training for staff other than drivers, however there are no specific requirements. Therefore, the following examples may provide a good start point when considering training for operatives throughout the process.

Staff members	Areas of consideration
<b>Transport managers, other fleet and driver managers should be aware of:</b>	<ul style="list-style-type: none"> <li>• The regulations relating to LSTs.</li> <li>• Differences between LSTs and standard trailers, including the characteristics of different LST designs if the fleet has more than one.</li> <li>• Risk of skills fade if used infrequently.</li> <li>• Challenges involved in switching between standard trailers and LSTs in a single shift.</li> </ul>
<b>Transport managers and planners (routes and work)</b>	<ul style="list-style-type: none"> <li>• The regulations relating to LSTs.</li> <li>• Challenges for a driver if asked to perform an unfamiliar route, with an unfamiliar trailer design, depending on the complexity of that route.</li> <li>• Company procedures for planned or emergency diversionary routes.</li> </ul>
<b>Loaders</b>	<ul style="list-style-type: none"> <li>• Any special conditions, in particular individual axle loading</li> </ul>
<b>Warehouse managers/planners/logistics software providers</b>	<ul style="list-style-type: none"> <li>• The demands of mixed load sizes.</li> <li>• Any restrictions on loading bays that can be used by LSTs.</li> </ul>
<b>Maintenance teams/providers</b>	<ul style="list-style-type: none"> <li>• Manufacturers' requirements and procedures for each design of steered axle present in the fleet.</li> </ul>
<b>Compliance managers</b>	<ul style="list-style-type: none"> <li>• The regulations relating to LSTs.</li> <li>• Record keeping requirements.</li> </ul>
<b>Senior managers and commercial teams</b>	<ul style="list-style-type: none"> <li>• The special nature of and regulations for LSTs in business planning and contract negotiation.</li> </ul>
<b>Site/facilities managers</b>	<ul style="list-style-type: none"> <li>• Turning circle and dimensions of LSTs, especially in turning.</li> <li>• Impact of LSTs on other vehicles, site traffic flow and parking.</li> </ul>

## Transitioning from the LST trial

Operators who participated in the GB LST trial have been operating under a Vehicle Special Order (VSO). For these trailers to continue to be used on the public road network, there was a requirement for them to be transitioned to the new regulation before 30 November 2023. However, Logistics UK received notice from DfT in November 2023 that this date was to be extended by three months, with a new deadline of **29 February 2024**. After this date, any trailers that have not been transitioned must not be used until they have completed the notification process as laid

out in the earlier section. This is because any remaining VSOs that expire after this date will be automatically revoked. No new trailers may be added to the trial and must follow the new regulation.

Operators must ensure that any systems used for driver training or route planning already meet, or are adjusted to meet, the special conditions for LSTs from the day the trailers move to the new regime. All other systems must also be upgraded to meet the regulations.