

Mr Robert Goodwill MP  
Parliamentary Under Secretary of State for Transport  
**Department for Transport**  
Great Minster House  
33 Horseferry Road  
London SW1P 4DR

28th October 2014

Dear Mr Goodwill

**Safer, more aerodynamic lorry designs need EU go-ahead through revision of Directive 96/53/EC**

The UK has been very supportive of enabling safer and cleaner lorry cabs so we are writing to ask you, in your role at the Council of Transport Ministers, to support changing this law to allow more aerodynamic, safer lorry designs as soon as possible. We hope you will be able to push for a final agreement during the current trialogue process that does not allow a moratorium until 2023 on new lorry designs. Hauliers should have the choice to buy safer, more fuel efficient and more comfortable HGV cabs for their fleets.

The safety of HGVs, especially in relation to cyclists, is a key issue for transport in the UK at the moment. In London, lorries were involved in over half of cyclists' deaths even though they only made up 5 per cent of traffic in both 2011 and 2012<sup>i</sup>. HGVs were involved in 51 per cent of fatal collisions on motorways - even though they only made up 11 per cent of motorway traffic in 2012<sup>ii</sup>.

Current EU rules on weights and dimensions of HGVs have indirectly restricted the length of cabins to 2.35m which explains why European lorries have such blunt brick-shaped cabin fronts which affect the aerodynamics of lorries, making them inefficient and dangerous in the event of a frontal crash. Today's cab design forces the driver to sit on top of the engine in such a high position that much of what happens around the cab is invisible to them – the so-called fatal blind spots. Redesigning lorry cabs to reduce blind spots could save hundreds of cyclists' and pedestrians' lives every year, according to a study by Loughborough University which found this 'direct vision' lorry concept would increase the driver's field of view in front and to the sides of the lorry by 50 per cent compared to today's lorries. This 80cm longer cab with a rounded nose, smaller dashboard, expanded glazed areas and a slightly lower driver position is supported by an alliance of 22 organisations, including the Mayor of London, the Freight Transport Association, TfL, cyclist, local authority and road safety organisations<sup>iii</sup>.

The revision of the weights and dimensions directive 96/53/EC is the enabling legislation to allow the extra dimensions in the cab to allow for the streamlined design, but also requires lorry makers to improve safety and in particular reduce blind spots. Hundreds more lives will be needlessly lost if we allow delays to the introduction of safer more aerodynamic HGV cab design, which allows more direct vision to reduce blind spots and has a crumple zone to make sure pedestrians and cyclists are not knocked underneath the wheels in a collision.

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We believe that the specific safety requirements can be developed through committee procedure within the Vehicle Type Approval framework.

A more streamlined design will also reduce fuel consumption. The European Commission estimates that a more streamlined cab along with rear flaps could improve fuel efficiency by up to 7-10 per cent, saving hauliers around €5,000 per vehicle per year at today's diesel prices<sup>iv</sup>. While lorries make up only 3 per cent of vehicles, they account for 25 per cent of road transport CO2 emissions in Europe.

The triilogue negotiations on the revision of the weights and dimensions directive 96/53/EC commenced on 22 October 2014. Both the EU Parliament and Commission want the new designs allowed by 2017/2018 which allows time for transposition into national laws. However, in its political agreement, the Council suggests new designs should be banned until at least 2023 which means they probably could not enter the market until 2025-2028. We understand that some member states, led by France and Sweden, are trying to delay the revised designs until after 2025 during the triilogue negotiations due to start this week. This is due to pressure from certain truck manufacturers, Volvo and Renault, who are leading the push for delaying the new designs because they wish to prevent competitors from developing new designs before they choose to.

We believe that if the UK Government is serious about improving road safety it must push for this introduction of the new HGV cab designs now on a voluntary basis as soon as possible. We will separately be asking MEPs to support this, too.

Yours sincerely,



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CC Eve Elwell Second Secretary Transport, UK Permanent Representation  
CC Simon Surtees Goodall, Freight, Operator Licensing & Roadworthiness Division -Department for Transport

The following organisations are joint signatories to the letter:



Cynthia Barlow OBE  
Chair, RoadPeace



Kate Cairns  
Founder, See Me Save Me



Martin Key  
Campaigns Manager, British Cycling



Stephen Martin,  
Head of Fleet SIG PLC

Institution of  
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Institution of Civil Engineers

Professor John Parkin  
Chair of Cycling Working Group  
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**SKANSKA**

Dylan Roberts,  
Director Health & Safety, Skanska UK

**LIVING STREETS**

PUTTING PEOPLE FIRST

Phillipa Hunt  
Director of Policy and Communications  
Living Streets

**KAYLEIGH**  
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Sarah Wootton-Ramsay  
Compliance Director  
Kayleigh Plant Hire Limited

**O'DONOVAN**  
WASTE DISPOSAL

Jacqueline O'Donovan  
Managing Director, O'Donovan Waste Disposal

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<sup>i</sup> London cycling fatality statistics from TfL & Parliamentary Question from Sadiq Khan January 2014

<sup>ii</sup> Traffic statistics table TRA0104, Accident statistics Table RAS 30017, both DfT published 2013 for 2012 figures

<sup>iii</sup> [http://www.transportenvironment.org/sites/te/files/publications/2014%2001%2028%20Safer%20cleaner%20lorries%20now%20-%20declaration\\_final\\_update.pdf](http://www.transportenvironment.org/sites/te/files/publications/2014%2001%2028%20Safer%20cleaner%20lorries%20now%20-%20declaration_final_update.pdf)

<sup>iv</sup> [http://ec.europa.eu/commission\\_2010-2014/kallas/headlines/news/2013/04/lorries\\_en.htm](http://ec.europa.eu/commission_2010-2014/kallas/headlines/news/2013/04/lorries_en.htm)