



# EUROCITIES statement on HGV Weights and Dimensions Directive

January 2014



Europe's cities are at the forefront of encouraging sustainable mobility, promoting the use of public transport, walking and cycling, all of which have significant benefits in terms of improved air quality, reduced congestion and greenhouse gas emissions, and better health.

Until relatively recently, little attention has been paid by policy makers to the challenges posed by urban freight traffic. Freight logistics play a vital role in cities, for example by supplying retail outlets or construction sites across urban areas. Urban transport planners must manage the demand for goods and materials while dealing with the impact of large vehicles on road space, other road users, road maintenance and the urban environment, often in historic and densely populated areas.

EU regulation of heavy goods vehicles (HGVs), including type approval, emissions, weight and dimensions, has an important influence on the impact of freight in urban areas, but does not always reflect the needs of cities. As city authorities increasingly develop freight strategies, EU and national level policy and regulation must support their efforts if they are to achieve the EU Transport White Paper objectives of essentially CO<sub>2</sub>-free city logistics by 2030 and halving road fatalities by 2020.

## Vulnerable road users in urban areas

As more and more people choose to walk and cycle, city authorities also have a responsibility to protect these vulnerable road users. Although the number of vulnerable road users fatalities remains low in proportion to the number of trips made in cities, cyclists remain at risk. In 2011, cycling accounted for 2% of daily journeys in London, but 20% of killed or seriously injured casualties.

As cities we are committed to reducing the number of serious accidents, particularly those involving vulnerable road users.

## Heavy goods vehicles and vulnerable road users

A problem that needs urgently to be addressed is collisions between HGVs and vulnerable road users, especially cyclists.

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Collisions with HGVs account for a disproportionately high number of cyclist fatalities. In London, for example, HGVs were involved in 53% of London cyclist deaths between 2008 and 2012, despite representing only 3% of traffic. For Copenhagen, in the same period, seven out of 12 cyclist deaths involved HGVs.

Last year, HGVs were involved in nine of the 14 cyclist deaths in London, and in Copenhagen, two of the four cyclist deaths. Analysis of accidents involving right-turn HGVs and cyclists<sup>1</sup> shows clearly that a significant factor in these accidents is poor visibility from the driver's cab meaning the driver is unable to see the cyclist before the accident, particularly when turning. This poor visibility is linked to the maximum length of HGVs: currently the driver's cab is on top of the engine to maximise load carrying capacity.

Cities continue to improve traffic safety using measures that are within their scope, such as improving road layout, offering cycle training for adults and children and developing campaigns directed towards professional drivers. Copenhagen for instance has included low cabins and glass doors in its waste truck procurement criteria to ensure better direct vision. Some public authorities are already encouraging haulage companies to promote safer urban driving among their drivers, including a pledge on safer cycling<sup>2</sup>. Smart technology may also play a role in making HGVs safer. But to make it safer for citizens who are walking and cycling in our cities, it is crucial that the EU directive on HGVs prioritises the safety of vulnerable road users.

## EUROCITIES recommendations

We welcome the European Commission's proposal to amend the HGV Weights and Dimensions Directive<sup>3</sup>. This would permit manufacturers to deviate from the current maximum length of an HGV to allow for a redesigned cab. Such a redesign would mean a more aerodynamic cab shape and enable the driver to sit lower down, giving a better view of the road and reducing blind spots. The Commission estimates that better designed cabs could save up to 400 lives per year in the EU. There would also be environmental and cost benefits from having a more aerodynamic shape, particularly for vehicles travelling longer distances.

However, we believe that a number of important changes need to be made to the European Commission's proposal for it to be effective and achieve real safety benefits for all road users, in particular cyclists and pedestrians.

We urge the European Parliament and Council of Ministers to adopt the following approach during the negotiation of the proposal:

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<sup>1</sup> For example: Danish Road Traffic Accident Investigation Board 2006 [www.hvu.dk/EN/publications/Pages/default.aspx](http://www.hvu.dk/EN/publications/Pages/default.aspx)

<sup>2</sup> For example [lcc.org.uk/pages/safer-lorries-pledge](http://lcc.org.uk/pages/safer-lorries-pledge)

<sup>3</sup> Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 96/53/EC of 25 July 1996 laying down for certain road vehicles circulating within the Community the maximum authorised dimensions in national and international traffic and the maximum authorised weights in international traffic COM(2013) 195 final, Brussels, 15.4.2013 [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)

1. Swiftly adopt the new framework allowing safer and cleaner truck design, as well as the implementing regulation needed so that safer, cleaner lorries are on European roads by 2020. Every year of delay means higher emissions, higher fuel bills and avoidable road deaths.
2. Put lorry safety at the heart of the new law, in particular by requiring the safety improvements to be mandatory for all trucks.
3. Ensure new lorry design is safer by requiring:
  - i. Better direct vision and fewer blind spots;
  - ii. A rounded, deflective front that avoids overruns and deflects pedestrians and cyclists in case of frontal collisions;
  - iii. A crumple zone or crash box to reduce impacts of lorry-to-car crashes;
4. Ensure the extra available space is also used to improve the working conditions of drivers.
5. Reject any calls for a moratorium on better lorry design. Truck makers must be given the chance to redesign their cabs as soon as the law is enacted and must be allowed to freely compete under the new rules.

We are aware that further legislative changes, notably concerning type approval regulations<sup>4</sup>, will be necessary in order to make the proposals fully effective. We recommend that the Commission begin making preparations for these changes as soon as possible.

We also encourage the European Commission to propose further measures to improve the safety of vulnerable road users, including greater emphasis on road safety in EU driver training regulations and the tightening of existing legislation to remove exemptions for the fitting of sideguards (underrun protection) on HGVs. Effective enforcement of existing (and future) safety rules also needs much more attention at local, national and EU level.

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<sup>4</sup>The main vehicle type approval directive is 2007/46:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2007:263:0001:0001:EN:PDF>

If the free circulation directive were amended to mandate new safety standards for trucks, the Commission would seek to make equivalent changes at the level of UNECE, where vehicle regulations are normally agreed and then amend the type approval directive and implementing regulations.