

GREATER LONDON AUTHORITY

[REDACTED]
(by email)

Our Ref: MGLA100718-7170

6 August 2018

Dear [REDACTED]

Thank you for your request for information in relation to comments made by Boris Johnson, which the GLA received on 9 July 2018. It is my understanding that Boris, in his resignation letter, was referring to the EU needing to legislate to enable and mandate the fundamental re-design of cabs. There are two regulations that govern truck design as well as what manufacturers can do voluntarily.

1. Weights & Dimensions

The first (which Boris refers to) is the Weights & Dimensions regulation (EU/2015/719, replacing 96/53/EC). This regulation dictates the 'design envelope' for trucks. Part of the reason vehicles are designed the way they are is due to the restrictions on the length of the vehicles. Cabs are relatively narrow, with the driver positioned high up over the engine in order to maximise payload.

TfL lobbied hard for this to change to allow a greater design envelope to enable improved direct vision. MEPs did vote in favour of an exception to allow vehicle manufacturers to exceed the current maximum lengths of HGVs as long as they comply with new environmental and road safety standards, and this was passed in 2015. This could therefore allow manufacturers to design cabs with increased direct vision and other safety features but it does not mandate them.

2. General Safety Regulation

The second regulation not referenced in the resignation letter is the General Safety Regulation (GSR/EC/661/2009). This is the one that provides the mandatory minimum safety standards manufacturers would have to meet in future designs and within the new exception in the 'design envelope' (such as any Direct Vision Standards, cycle and pedestrian warning systems etc). Again, TfL has lobbied hard in the last few years to have direct vision standards considered for inclusion.

3. Manufacturer position

Manufacturers can (and have been) making changes to designs on a voluntary basis such as the low entry cabs on construction vehicles. However, their general argument is that any largescale

fundamental change in cab design to make HGVs fit for urban environments is required to be mandated at an EU level because re-design is costly. They don't want different standards in different countries and the regulation would enable fair competition across manufacturers - who will be at different stages of the cab design lifecycle (up to 15-20 years).

If you have any further questions relating to this matter, please contact me, quoting the reference MGLA100718-7170.

Yours sincerely

Paul Robinson
Information Governance Officer

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