

Amendments to permissible vehicle weights and dimensions, including to incentivise cleaner fuel technologies, and other associated proposals

Department for Transport

RPC rating: validated

The Department initially submitted the proposal as an NQRP confirmation. Due to the qualifying elements of the proposal, the Department resubmitted the assessment as a validation IA.

Description of proposal

The proposal will implement the EU Directive 2015/719 which specifies the maximum authorised weights for specific groups of vehicles that travel internationally, and the maximum authorised dimensions for vehicles that travel within the EU. The proposal introduces five changes, four of which are deregulatory. The changes consist of:

1. An increase in the maximum weight limit by one tonne for specific types of alternatively fuelled vehicles that make international journeys.
2. An increase in the weight limit, by 1.5 tonnes, for all two-axle buses that make international journeys.
3. The requirement for shippers to provide a statement of weight of containers to hauliers. This is the regulatory element of the proposal. It is required to provide the guarantee to hauliers that the container does not exceed the maximum weight limit, and *'to clarify legal responsibilities in the event of roadside inspection'*.
4. Allowing two axle motor vehicles and three axle trailer articulated combinations to operate at a maximum weight limit of 42 tonnes. The provisions for intermodal transport operations will also be extended to include 45-foot freight trailers and the carriage of two containers or swap bodies with a combined maximum total length of 5 feet by an articulated vehicle.
5. A removal of the requirement for vehicles fuelled by hydrogen, natural gas or biomethane to acquire a Vehicle Special Order (VSO). This will reduce the administrative burden on hauliers.

The first two changes are permissive. For these two elements of the proposal, operators will not be required to make any changes to their vehicles or business operations, but may choose to do so if the costs outweigh the benefits for them.

The Department proposes to extend these permissive changes to domestic, as well as international, vehicles. This will permit domestic vehicles to take advantage of the increased weight limits and dimensions, and offer an incentive for UK firms to invest in alternatively fuelled vehicles.

The regulatory element of the proposal, change three, is a requirement under the Directive. Under the Directive, all shippers must provide a statement of weight of containers to hauliers. Thus the Department asserts that there is no gold-plating of the Directive.

The fourth and fifth elements of the proposal are deregulatory and are being applied according to the requirements of the Directive.

Impacts of proposal

The assessment states that consultation respondents confirmed that the costs to business of the regulatory aspect of the proposal will be minimal and '*not material*'. The Department notes that shippers are already mandated under 'The Safety of Life at Sea (SOLAS) Convention' to hold information on the weight of containers on board. Therefore the additional burden on shippers is expected to be negligible.

The direct benefit to business of the proposal is the ability of operators to take advantage of the increased payload for existing vehicles owned. The assessment estimates that roughly 20,000 two-axle rigid buses will be impacted, gaining an 8% increase beyond their current weight limit. However, the Department notes that evidence shows that diesel buses are not limited by weight and thus the benefits of this proposal are likely to be minimal for diesel bus operators. It also states that only 0.3 per cent of 2-axle buses are currently alternatively fuelled, and therefore the direct benefit to 2-axle buses of the weight increase is expected to be small.

A further group of HGVs and buses will be affected, and could benefit from the proposal. The Department states that they are unable to disaggregate the data on this group by fuel type, but expect that the proportion of alternatively fuelled vehicles will amount to less than 1 per cent of the 45,000 vehicles in this group. The Department states that monetisation of this benefit was not possible, given the

diverse range of businesses in this group that are affected. The IA notes that the benefits per vehicle may be substantial, but due to the small number of vehicles affected the benefit across industry is likely to be negligible.

The Department anticipates an uptake in alternatively fuelled vehicles, as a result of the higher weight limits. The assessment notes that at present, alternatively fuelled vehicles have a competitive disadvantage due to *'heavier powertrains that limit their payload'*. These changes aim to level the playing field between non-alternatively fuelled and alternatively fuelled vehicles.

The submission considers the indirect benefits to businesses that switch to alternatively fuelled vehicles. The Department acknowledges that the potential uptake of these types of vehicles is uncertain, but firms that switch will experience reduced fuel costs.

The Department notes that there will also be societal benefits of reduced emissions in the future, as alternative fuels emit less carbon than petrol and diesel.

Additionally, operators of certain alternatively-fuelled vehicles will no longer be required to obtain a VSO. These operators are expected to gain savings from reduced administrative costs.

The RPC verifies the estimated equivalent annual net direct cost to business (EANDCB) of £0 million. This will be a qualifying regulatory provision that will score under the business impact target.

Quality of submission

The RPC accepts that the regulatory element of the proposal is required to bring about the deregulatory package of measures, and is logically part of the same package of reforms. The Department has also provided adequate assurance that the regulatory element of the proposal is low cost.

The RPC sought clarification from the Department that the third element of the package does not involve gold plating of the Directive. The Department provided further information that the third change is required under the Directive, such that it is now clear that there is no gold plating. The original assessment would have benefited from including this additional information.

The RPC notes that the permissive elements of the package would be qualifying, in so far as they are applied to domestic vehicles. The RPC also sought clarification on what proportion of the total estimated number of buses are domestic and whether the benefit of extended weight limits to domestic vehicles could be monetised. If the proportion of vehicles affected were to be significant, the proposal could result in a significant monetised benefit to firms that could contribute to the BIT. The Department's response clarified that the majority of buses affected were diesel fuelled, and that evidence shows that diesel buses are not limited by weight and thus are not expected to benefit from the changes. It also stated that only 0.3% of buses are currently alternatively fuelled, and therefore the benefit of increased weight limits for these vehicles is likely to be small. The Department has provided sufficient assurance to the RPC that the qualifying benefit will be minimal. Therefore, the RPC accepts that the Department has been unable to monetise the associated benefits to domestic businesses.

Departmental assessment

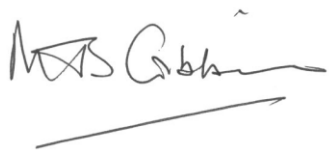
Classification	Non-qualifying regulatory provision (EU)
Equivalent annual net direct cost to business (EANDCB)	Not applicable (low cost non-qualifying regulatory provision)

RPC assessment

Classification	Qualifying regulatory provision
EANDCB – RPC validated ¹	£0.0 million
Business Impact Target (BIT) Score ¹	£0.0 million
Small and micro business assessment	Not required (fast track low-cost regulation)

¹ For reporting purposes, the RPC validates EANDCB and BIT score figures to the nearest £100,000.

Opinion: Validation IA
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Michael Gibbons CBE, Chairman