



Department
for Transport

Consultation Response Report

Examining the Speed Limit for HGVs over 7.5 tonnes on
Single Carriageway Roads: Summary of Responses and
Government Response

The Department for Transport has actively considered the needs of blind and partially sighted people in accessing this document. The text will be made available in full on the Department's website. The text may be freely downloaded and translated by individuals or organisations for conversion into other accessible formats. If you have other needs in this regard please contact the Department.

Department for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR
Telephone 0300 330 3000
Website www.gov.uk/dft
General email enquiries FAX9643@dft.gsi.gov.uk

© Crown copyright 2014

Copyright in the typographical arrangement rests with the Crown.

You may re-use this information (not including logos or third-party material) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence, visit www.nationalarchives.gov.uk/doc/open-government-licence/ or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or e-mail: psi@nationalarchives.gsi.gov.uk.

Where we have identified any third-party copyright information you will need to obtain permission from the copyright holders concerned.

Contents

Foreword	4
Part 1 - Introduction	6
Table of Questions.....	7
Part 2 - Executive Summary.....	10
Next Steps	11
Part 3 - Detailed Summary of Responses	12

Foreword

I am very pleased with the high level of interest shown in this consultation and would like to thank all those who responded for their valuable input. I have noted the views expressed, both by people concerned about the proposals and supporters.

After careful consideration I have decided to proceed with plans to increase the speed limit for heavy goods vehicles of over 7.5 tonnes from 40mph to 50mph on single carriageway roads in England and Wales.

This increase will bring up to date a speed limit introduced over 40 years ago, modernising an antiquated restriction which puts us out of step with many other European countries, including some of those who alongside the UK have the best road safety records.

It will help to reduce delays and congestion, making better use of our roads for the HGVs delivering the goods we all rely on, and freeing other road users from the frustration of getting stuck behind slow HGVs. The 50 mph limit for HGVs will match the 50 mph limit for coaches, cars towing caravans and smaller goods vehicles in place already on these roads.

The net benefit to business is valued at £11.8m per year, for the freight and logistics industry. There are more than a quarter of a million people who drive large goods vehicles for a living. Many more drive them in the course of their work and are taking up additional training, which must be completed by this September.

This change is part of a package of measures being taken forward to build on our foundation of steadily improving road safety, and ensure our roads are governed by a modern regulatory framework, freeing business and the motorist from unnecessary red tape.

Road safety for everyone is a key priority and the consultation responses include both concerns about potential increased risks due to higher speeds and views about improved safety due to less overtaking. In conjunction with this national speed limit change, I am keen to encourage English local authorities to take up the opportunities in the 2013 speed limit circular and put lower speed limits for all traffic on roads where that is the right thing to do. Reasons for these local limits include their use (for example by pedestrians and cyclists), layout and the development on them.

I intend to encourage the further use of driver conduct hearings to increase the incentive for commercial drivers to comply with safety-related regulations. Also I am announcing that the Department will take forward a major study about rural

road safety to consider what can be done over the medium term, building on the road safety changes implemented during the last four years.

Claire Perry MP, Parliamentary Under-Secretary of State for Transport

Part 1 - Introduction

1. The current speed limit on single carriageways for HGVs over 7.5t is 40 mph. The speed limit for smaller HGVs (those between 3.5t and 7.5t) is 50 mph. Vehicle speed limits are prescribed under provisions in the Road Traffic Regulation Act 1984 (RTRA).¹
2. Trade associations in the freight sector asked to see the limit for the larger HGVs over 7.5t increased because of the considerable time savings this could generate. Other benefits include levelling the playing field between hauliers so that those who obey the law are not penalised.
3. A consultation-stage Impact Assessment (IA) summarised the monetised costs and benefits by Option and Scenario, and was published with the consultation document.
4. In the consultation we sought views on:
 - a. Whether to increase the speed limit for HGVs over 7.5t to 50 mph
 - b. Whether to increase the speed limit for HGVs over 7.5t to 45 mph
 - c. Any further options not identified in this document
5. We also asked for more information on:
 - a. Evidence that could enable assessment of additional collisions caused by or involving HGVs over 7.5t on single carriageway roads if speed limits were increased
 - b. Air Quality
 - c. Noise impacts
 - d. Behaviour changes for all classes of vehicles
 - e. A modal shift in freight transport
 - f. Road maintenance requirements
 - g. Local authorities reducing speed limits on non-trunk primary routes
 - h. Printed public information
6. The consultation document was published on the Department for Transport's (DfT) website and sent electronically to stakeholders from other government departments, private companies, and representative organisations. The consultation ran for 12 weeks, and closed on 1 February 2013.
7. The consultation covered England and Wales only, as vehicle specific speed limits are devolved to Scotland and Northern Ireland.

¹The Scotland Act 2012 gave Scottish Ministers the power to regulate the speed of all classes of vehicle. This consultation therefore focussed on England and Wales.

Table of Questions

No.	Question
1	Policy option 1: Raise the national speed limit for HGVs over 7.5t from 40 to 50 mph on single carriageway roads. Is this your preferred policy option? Please explain your answer.
2	Policy option 2: Raise the national speed limit for HGVs over 7.5t from 40 to 45 mph on single carriageway roads. Is this your preferred policy option? Please explain your answer.
3	<p>Do you consider there to be any additional policy options, or variants of policy options 1 and 2? If so, please explain fully and provide any evidence you may have.</p> <p>For example, only increasing the speed limit for HGVs over 7.5t on single carriageways where the national speed limit applies, and retaining the 40 mph limit at other times</p>
4	In your opinion does the current 40 mph speed limit cause any of the following: unnecessary costs to vehicle operators; congestion; avoidable overtaking collisions; an uneven playing field for businesses; or anything not mentioned in this list? Please explain your answer and provide any evidence you may have.
5	We welcome views from HGV operators and trade associations about whether they feel the balance of savings and costs of extra speed detailed in the Impact Assessment reflects their own experience or expectations?
6	If the speed limit for HGVs over 7.5t is not raised on these roads, collisions as a result of 'platooning' could continue. If it is, the frequency of collisions could decrease due to a reduction in 'platooning', though on the other hand the severity of collisions could increase. Do you have any opinion or evidence on the effect of 'platooning' on road safety, or on the frequency or severity of collisions involving HGVs on single carriageway roads and what effect an increase in their maximum speed limit on these roads would have on safety? If so, please provide it in response to Q. 6.
7	Do you have any opinion or evidence on what effect an increase in the maximum speed limit for HGVs over 7.5t on these roads would have on non-HGV vehicle speeds such as car speeds?
8	The Department invites information on where there are single carriageway roads which are subject to the national speed limit, or are signed at 50 mph, in areas where there are air quality problems.
9	<p>What impacts, if any, do you think there will be to the following if an increased speed limit for HGVs over 7.5t on single carriageway roads is introduced?</p> <p>a) Air Quality Management Areas (AQMAs). Local authorities may have specific</p>

	evidence on the effect on AQMAs in their authority; b) EU air quality standards ² ; c) Noise levels; d) Areas currently identified as noise hotspots ³
10	If as a result of either of the policy options being implemented there was a reduction in 'platooning' do you think there would be a significant impact on: a) Noise b) Air quality
11	Do you think either of the policy options goes against the underlying principles of the EU Environmental Noise Directive ⁴ or of the Noise Policy Statement for England? ⁵
12	Do you think that all of the potential health and social costs of the policy options have been considered in the Impact Assessment? Please provide details if you think costs have not been included.
13	Do you believe an increase in speed for this class of vehicle on these roads will cause more HGVs over 7.5t to use single carriageway roads, which do not currently?
14	Do you think some freight may switch from rail or water to HGVs, if the speed limit is increased on these roads for these vehicles?
15	Do you think that there may be added wear and tear on these roads if the speed limit is increased for these vehicles? Local authorities may have specific comments or evidence, with regard to roads in their authority.
16	Local authorities have powers to alter speed limits on the local road network, including non-trunk primary routes, in line with guidance set out in Setting Local Speed Limits, DfT Circular 1/06. ⁶ Do you think that the increase in the national speed limit for HGVs over 7.5t on single carriageways, would make it more likely that local authorities would introduce more local speed restrictions, and if so on which roads?
17	If you are an organisation that provides information and you believe that an increased speed for this class of vehicle on single carriageways would incur costs for your organisation in the form of publicity or conversion costs please indicate what these may be. Also please advise whether these costs would be reduced given a lead-in time between announcement and policy implementation

² <http://ec.europa.eu/environment/air/quality/standards.htm>

<http://services.defra.gov.uk/wps/portal/noise>

⁴ <http://ec.europa.eu/environment/noise/directive.htm>

⁵ <http://www.defra.gov.uk/publications/files/pb13750-noise-policy.pdf>

⁶ This publication was revised 18th January 2013 (ref: DfT 01/2013)

<http://www.dft.gov.uk/publications/local-speed-limits-guidance/>

This revision provided updated guidance and introduced a 'Speed Limit Appraisal Tool' to assist local councils to assess the full costs and benefits of any proposed local speed limit schemes.

<https://www.gov.uk/government/publications/speed-limit-appraisal-tool>

	as a result of costs being rolled into existing plans.
--	--

Part 2 - Executive Summary

8. The Department received 703 responses in total. We are pleased with the high response rate and grateful for the time people took to reply. Responses to the consultation were used to inform the Government's decision on next steps.

9. Respondents were broadly categorised into 11 main groups. They were:

Group	No.
Businesses	7
Local and parish councils and council employees	108
Education/transport research	11
Farming sector	9
Local associations/groups	25
Logistics sector	79
Others	10
Private individuals	265
Public services	17
Road safety groups	8
Vulnerable road users	164
Total	703

10. Respondents were generally not in favour of increasing the speed limit for HGVs over 7.5 tonnes on single carriageways, with nearly three-quarters of respondents saying "no" to Policy Option 1 to raise the national speed limit for HGVs over 7.5t from 40 to 50 mph.

11. However of those who said "yes" or "no" to Option 1, 77% of logistics sector respondents supported an increase while 78% of private individuals (206 responses) were not in favour. It should be noted that logistics sector respondents were made up of a few responses from whole companies, and four associations whose membership ranges from 300 to 14,000 members.

12. The most common reason cited by respondents for not supporting an increase in speed limit was concerns about road safety, with the next most common reasons being concerns regarding road maintenance and the environment. The suggestion mentioned most by this group of people was to have better enforcement of the current speed limit.

13. Interestingly, respondents who answered "yes" or "no" to Policy Option 1, cited the same reasons for their response, for example those who thought the increase was a good idea cited road safety advantages, while those who were against increasing the speed said there would be negative road safety impacts.

Next Steps

14. The Government will now proceed with the necessary regulatory changes for an increase in maximum speed from 40mph to 50mph for HGVs over 7.5 tonnes on single carriageway roads to come into force before April 2015.

Part 3 - Detailed Summary of Responses

Question 1: 'Policy option 1: Raise the national speed limit for HGVs over 7.5t from 40 to 50 mph on single carriageway roads. Is this your preferred policy option?'

OPTION 1	
Response	No.
Yes	144
No	515
Yes but...	31
Blank	13
Total	703

Yes:

- 15.** Of those who were supportive of an increase in speed limit to 50mph, 61 were from the logistics sector; 48 were private individuals; 13 were in the local council category; 7 from the public services; 4 responses came from businesses; and for the rest of the organisational categories, 1 to 3 respondents were in favour of this option.
- 16.** Common reasons for answering 'yes' were:
 - The benefits to road safety (123 responses cited this reason)
 - The benefits to businesses (62)
 - The improvements to congestion (53)
 - The capabilities and improved safety features of modern HGVs (50)
 - The benefits to the environment (24)
- 17.** Many respondents who saw road safety benefits as a result of increased speed cited the reduced likelihood of overtaking as the main reason for this. One respondent said:

"The biggest impact of platooning is the psychological impacts it has on following [drivers] who need or wish to make better legal and safe progress. This impact becomes greater as the differential between speeds increases and also as distances increase. As platoons increase in length it can result in overtaking becoming impossible for large distances increasing frustration."

Another said:

"I ... don't believe there will be as much platooning due to the higher speeds, hence less frustration and less dangerous overtaking manoeuvres."

18. One respondent who cited the benefits to business said:

"The 'just in time' culture of the country's ... businesses demand a constant supply of goods delivered to a strict loading/unloading appointment system making speedy but safe progress along the countries road system a definite requirement. Uplifting the speed limit to 50 mph would enable these requirements to be met more easily."

Another said:

"I think the economic effects on business car users must not be forgotten."

A third responded:

"As a driver of all vehicle types, the current limit is unrealistic, wastes resources and time, putting our business at a distinct disadvantage."

19. Of those who cited the problems of congestion caused by the current speed limit, one responded:

"Congestion is a feature, in particular in rural areas such as Shropshire where I am based. Most roads are single carriageway including significant arteries into and out of Wales."

20. Among those who thought modern improvements to HGVs were important, one respondent, a lorry driver and cyclist, said:

"I have witnessed some crazy overtaking manoeuvres as frustrated motorists try to get past ... The brakes on modern lorries are excellent and I think that progress could be made safely."

A respondent answering on behalf of a logistics company said:

"...Vehicles now have more efficient braking systems such as EBS and also ESP electronic stability protection ... HGV stopping distances have decreased due to this technology."

- 21.** Among the 24 who believed there would be environmental benefits to increasing speed for these vehicles, one respondent said:

"...most HGVs when travelling at 40 mph are not travelling with the vehicle in its highest gear, therefore the vehicle is revving harder, travelling slower, using more fuel and hence increasing the carbon footprint. I believe that increasing the speed limit on single carriageway roads would actually reduce fuel costs, and also reduce the carbon footprint."

No:

- 22.** Of those who were against increasing the speed limit to 50mph, 206 were private individuals; 159 were assigned the label 'vulnerable road user' (i.e. a cyclist, walker or horse rider or representative groups of these road users); 83 were from the local council category; 22 from local associations and groups; 11 from the logistics sector; 9 from the public services; 8 from the education/transport research sector; 6 from the farming sector; 6 from road safety groups; and 2 from businesses.

- 23.** Common reasons for answering 'no' were:

- Road safety concerns (506 responses cited this reason)
- The negative impact on road maintenance (248)
- The negative impact on the environment (217)
- The suitability of the road (153)
- The negative impact on lifestyles and wellbeing (36)
- The negative impact on congestion (15)
- The negative impact on businesses (9)

- 24.** While almost all respondents who were for an increased speed limit cited road safety as a reason for their opinion, almost all of those who said "no" also gave road safety as a reason. Their main concerns were more serious outcomes in the event of crashes; the impact on "vulnerable road users" in particular; that vehicles would take longer to brake; that drivers would still attempt dangerous overtaking manoeuvres; and that an increased speed limit would increase the time and distance required to overtake.

- 25.** One individual said:

"Higher HGV speeds will result in more serious outcomes in the event of crashes."

26. Another said:

"...single carriageway roads often have poor sight lines and this will greatly increase the stopping distance lorries require. This is likely to lead to many more accidents and as higher speeds would be involved they will be of increased severity. It would also raise the number of fatalities involving lorries and vulnerable road users."

27. A County Council said:

"[We] strongly [object] to the proposed blanket speed increases due to anticipated impacts on road safety and the environment. In the past three years there have been 90 personal injury crashes ... involving HGVs on single carriageway roads with speed limits of 50mph or more. A particular concern is the impact on vulnerable road users as over the last three years 90% of those injured in HGV crashes have not been occupants of the HGV. As such the impact that increased speed could have on both the likelihood of a HGV related crash occurring and any ensuing injuries is severe."

28. One individual responded:

"Car drivers will still attempt to overtake HGVs travelling at 50mph on 60mph roads – but it will be less safe, as the speed difference is not as large."

29. Many respondents who said "no" to a speed limit increase thought the quality of the road surface would be affected. One Parish Council said:

"Rural roads in Kent already suffer badly from HGV traffic and the added wear and tear from increased speeds would both damage the road network and increase maintenance costs."

30. While some people who supported the increase in speed limit foresaw improvements to the environment through allowing HGVs to travel faster, many people who answered "no" to increased speed thought it would increase emissions and also noise impacts.

31. Many who said "no" to a speed limit increase thought single carriageways were unsuitable for faster speeds. One individual said:

"The nature of single carriageway roads is that there is, by definition, less room for manoeuvre generally, and when overtaking in particular."

32. A small proportion cited an issue not raised in the consultation document and supporting documentation; that of the perceived potential for decreased wellbeing and a negative impact on healthy lifestyles. For example a respondent said:

"This will make these roads less safe for cyclists, horse riders [and] often walkers and discourage active travel, the opposite of what central [government] is aiming for."

33. A few respondents thought congestion would be worsened by increased speed limits, and a few said that businesses would suffer from increased fuel consumption and mechanical wear and tear costs.

Government response

34. The Government has decided to go ahead with this policy option. This is despite most of the responses received being against policy option 1. However some of the responses (both for and against) were from organisations representing many people. This includes some of the responses in favour from logistics.

35. The consultation was not designed to be a poll. The Government considers the major reasons for negative responses can and will be addressed. In particular the road safety concerns about the change are being addressed. The Government has also assessed the major effects and the evidence provided about them. It considers the best course of action is to change the speed limit, alongside a number of other changes.

Question 2: 'Policy option 2: Raise the national speed limit for HGVs over 7.5t from 40 to 45 mph on single carriageway roads. Is this your preferred policy option?'

36. Only 4 responses said they would support this option with 602 (86% of overall responses) saying 'No'.

37. The reason for this response is clear. Those who answered "yes" to Option 1 but "no" to Option 2 thought the 45mph option would cause confusion, and produce little benefit to business or road safety.

38. A county council said:

"As all other speed limits range from 20mph through to 70mph in multiples of 10mph, it is considered that a speed limit of 45mph would cause confusion."

Other respondents said:

"I consider that this option would offer minimal benefits to road users and the economy, while incurring similar costs to the taxpayer. I would also not welcome the introduction of speed limits in 5mph increments, as I think this would likely cause confusion to the public."

"An increase of only 5mph would still leave a significant differential, which would not realise the full economic benefits and nor would it adequately reduce frustration from following drivers and the incentive to overtake."

- 39.** Those who answered "no" to both the 50mph and 45mph speed limits cited similar justifications for both:

"The same objections apply to this option as to option 1 above, albeit to slightly reduced degree."

"It is marginally less dangerous than the proposal above, but more dangerous than the current state of play."

"Raising the speed limit by 5mph will hardly effect delivery times & still increase the hazards to cyclists."

Government response

- 40.** Please see Question 3.

Question 3: Do you consider there to be any additional policy options, or variants of policy options 1 and 2? If so, please explain fully and provide any evidence you may have.

For example, only increasing the speed limit for HGVs over 7.5t on single carriageways where the national speed limit applies, and retaining the 40 mph limit at other times.

- 41.** About half of all respondents offered suggestions for alternative proposals.
- 42.** Some supported the exact principle of the above example, and about 60 responses advocated an increase on certain roads only. This group of responses spanned across both those who were for an increase in speed limit, and those against.
- 43.** Responses included a logistics company who said:

"Our preferred option is to increase the speed limit for HGVs over 7.5t on single carriageways where the national speed limit applies, and retain the 40 mph limit elsewhere... We recognise that where single carriageways have not been given the national speed limit, this is often justified and takes into account the particular safety requirements of individual roads. For this reason, we believe that it is sensible to retain the 40mph limit on these roads."

An organisation representing motorists said:

"We believe that the HGV speed limit should reflect the standard of the road. Not all single carriageways will be of a sufficient standard to safely allow large goods vehicles to travel at 50mph in relative safety. If the speed limit for cars has been reduced it will invariably have been for safety reasons and this should apply equally to HGVs. A system where the limit for HGVs is 50 in a 60, 40 in a 50 i.e. 10mph below that for cars seems to us simple, easy to understand and likely to command support from all road users."

44. The most common suggestion, at 120 responses, was, to increase the enforcement of speed limits.

One person said:

"My preferred policy option would be to significantly tighten up on the almost non-existent enforcement of vehicle speeds. Then all HGV operators would be competing on a level playing field, without giving the illegal operators any advantage."

45. The second most common suggestion at 65 responses was to reduce speed limits.

Government response

46. The Government notes and has considered all of the views received. The 45 mph option has been discounted as we agree it could cause confusion, and it would not provide many benefits. It also achieved very little support.
47. The costs and benefits of increasing speed limits on some roads would mirror those of increasing the speed limit on all single carriageways, though as the change would have an impact on fewer roads, this would reduce the costs and benefits. There is a risk that this approach could cause confusion and there would be extra signing requirements. In addition a signed local 50 mph road limit would be associated with a different HGV speed limit depending on whether the road involved was a single or dual carriageway.

48. Localised road safety or environmental issues can be addressed by local authorities introducing local speed restrictions for all vehicles. So this provides some of the local variation sought through having different HGV speed limits linked to different road speed limits.
49. In respect of an option for additional enforcement, this is primarily an issue for local police forces. We do not consider it is realistic to expect considerably more enforcement of the current speed limit. However the Government is making changes to allow more sanctions to be applied to offending drivers via the driver conduct process. In respect of reducing speed limits, risks include exacerbating the current problems and being counter-productive.
50. Having considered the evidence available, the Government decision is that 50 mph is the most appropriate speed limit for HGVs >7.5t on single carriageway roads in England and Wales.

Question 4: In your opinion does the current 40 mph speed limit cause any of the following: unnecessary costs to vehicle operators; congestion; avoidable overtaking collisions; an uneven playing field for businesses; or anything not mentioned in this list? Please explain your answer and provide any evidence you may have.

51. 534 respondents answered question 4.
52. 124 of the 144 respondents who were for a speed increase answered this question.
53. As expected, all who answered question 4 agreed that the 40 mph speed limit causes one or more of the consequences given. The issue mentioned most by these people was the avoidable overtaking collisions which 98 of these respondents cited as a problem. The next most frequently mentioned problem was congestion, closely followed by unnecessary cost. Not many of this group however thought an uneven playing field for businesses was a product of the current 40mph speed limit.
54. One county council said:

"[We are] predominantly a rural county, and delays and extra costs potentially has a large impact on businesses in rural locations and disadvantages them."
55. Many in this group reported regularly witnessing 'near-misses' on single carriageways due to dangerous overtaking manoeuvres.

An individual said:

"My 20-mile commute time is extended considerably ... due to the congestion that the slow vehicles create. The congestion causes aggressive driving behaviour from other road users including risky overtaking. I have been involved in several near-misses with overtaking vehicles that would have been head-on collisions if evasive action was not taken."

A HGV driver said:

"Daily when on an A road I will observe a near miss. I often have to pull into a lay by and allow traffic behind me to pass. Car drivers, small vans and other HGVs get frustrated [and] this has the effect of causing accidents."

56. Some HGV drivers also pointed out an issue not mentioned in the consultation or related documents; that of an increased feeling of fatigue when travelling at 40mph and the resulting lapse of concentration felt at this speed.

57. 368 of the 515 respondents who were against a speed limit increase responded to question 4.

58. As expected, these respondents did not agree that the problems listed could be solved by raising the speed limits for HGVs over 7.5t. This group believed that increasing the speed limit for these vehicles on these roads would increase the damage caused in collisions or even increase the chances of accidents occurring in the first place. Many also thought that increasing the speed limit for HGVs over 7.5t would not deter those who currently carry out dangerous overtaking manoeuvres. Many pointed out that they believed increased fuel costs would outweigh any time savings for the industry, which, some thought, would be minimal anyway. This group also largely believed that the current uneven playing field could be solved through more enforcement of the current speed limits.

59. A lot of the respondents in this group thought that safety was more important than congestion or costs to the freight industry.

60. One respondent said:

"Whatever the limit, there will still be people who will take risks overtaking and who will still be causing/being involved in accidents. I cannot believe that there will be a huge saving for businesses by increasing the limit. However, I do believe that there will be more serious accidents, caused by raising the speed limit."

61. One respondent employed in a logistics company said:

"[We] sent a driver to one of our larger ... companies ... for a week. He was doing exactly the same work as one of the clients drivers. Our clients driver completed his week as normal, basically 56 mph all day long irrespective of road type. My drivers remained at the speed limit all week ... We used less fuel, lowered emissions, [and] completed exactly the same work over the same distance. Their driver at the end of the week went home and "wound down" [while] our driver took his family for a meal. My driver booked off about 1 hr and 20 minutes later than theirs..."

Government response

62. The Government notes the concerns raised about negative impacts of the 40mph limit, particularly dangerous overtaking. We consider that these will be addressed by the speed limit change to 50mph, although there be risks related to overtaking remaining. The Department's impact assessment indicates a likely significant time saving for business (a conservative £11m/year), and we consider that additional enforcement of an outdated limit would not be a good use of police resources.

Question 5: We welcome views from HGV operators and trade associations about whether they feel the balance of savings and costs of extra speed detailed in the Impact Assessment reflects their own experience or expectations?

63. Not many respondents answered this question and many of those responses that did, either answered "N/A" or did not clearly express an opinion related to the question.

64. Of those that did, ten said that an increased speed would bring fuel savings for operators. One said:

"Modern European HGVs have gear sets, power curves and ratios that provide greatest operator economy at sustained road speeds. Being able to build and maintain momentum is a fundamental to economic operation. Where a 40 mph ceiling is in place, this is outside the standard economic gearing for many trucks on standard European highways. Technical inefficiencies lead to an increase of fuel consumption and noise at lower speeds."

65. However not all agreed on this point. Three respondents who answered this question argued that changes would not save money. One said:

"Our findings show that fleets that are operated within the existing speed limits show a vast improvement in mile per gallon figures and overall vehicles running costs, thereby disproving some of the allegations that running in this way is costing money ... there is not sufficient evidence to support the reduction in time against the savings in fuel and other running costs."

Another said:

"... I cannot understand why any manager or operator should feel that raising the speed limit is going to save them money. Safer and more fuel efficient driving will save much more money."

66. Three respondents thought that the Impact Assessment omitted to consider benefits to other vehicle users such as those who use cars for business purposes or drivers of light goods vehicles. One respondent said:

"The Impact Assessment does not attempt to quantify the time savings to car and van drivers and their passengers, who would no longer be held up behind HGVs currently travelling at 40 mph ... While the National Transport Model may be unable to calculate these time savings, the likelihood is that they could easily exceed the savings to HGV operators themselves."

Government response

67. The Government notes the mixed views on fuel savings. We have considered all responses during the revision of the impact assessment. Unfortunately, we have not been able to calculate the potential savings to car users as part of the revised impact assessment.

Question 6: If the speed limit for HGVs over 7.5t is not raised on these roads, collisions as a result of 'platooning' could continue. If it is, the frequency of collisions could decrease due to a reduction in 'platooning', though on the other hand the severity of collisions could increase. Do you have any opinion or evidence on the effect of 'platooning' on road safety, or on the frequency or severity of collisions involving HGVs on single carriageway roads and what effect an increase in their maximum speed limit on these roads would have on safety? If so, please provide it in response to Q. 6.

68. Almost all respondents provided an answer for question 6.
69. Only 40 respondents stated whether they agreed or disagreed with the opening statement in the question and the split was almost even.

70. There were some common assertions among these responses. 104 respondents believed the severity of collisions would increase if the speed limit for HGVs over 7.5t is raised.
71. 99 thought the risk of collisions occurring would increase. One group said:
- "...Data shows that more HGVs are having injury collisions on roads subject to a 60mph restrictions than in 50mph restriction area's, again supporting [the assertion] that higher speeds also infer a greater number of KSI collisions."*
72. Another group said:
- "A 5 year snap shot of the available evidence from 2007-11 for HGVs shows: 41 collisions recorded on 50mph or 60mph, single carriageway roads (... 6% of all fatal collisions, 4% of all serious collisions); Most common collision types are other vehicles drifting into the path of HGVs (8 collisions, 21%) and HGVs failing to stop in time for stationary traffic (6 collisions, 15%); 4 collisions occurred when HGVs have overtaken cyclists...; 2 collisions occurred when other vehicles have been overtaking HGVs. The argument that speeding up slow moving HGVs will reduce injuries involving other faster vehicles overtaking them would have only helped to prevent 2 injury collisions in the last 5 years."*
73. However 52 responses believed an increase in the maximum speed for these vehicles on single carriageways would improve road safety. One respondent said:
- "If cars are able to maintain 60mph safely on a single carriageway road and HGVs are interspersed at 40mph then as overtaking opportunities present themselves cars will overtake until a platoon of HGVs occurs. That is 2-3+ HGVs sequentially spaced on the highway. Motorists are tempted to either ambitiously overtake several HGVs at once or "bunny hop" between them which causes the HGV to un-necessarily brake to maintain braking space separation. By having a delta speed of 20mph more car drivers are tempted to these options. A 10mph delta will increase the number of car drivers unwilling to select these options and thus reduce the incidence of accident. In terms of severity of accident speed is a function of severity. Relative speed is however a function of frequency in that as the relative speed is reduced (HGV at 50 mph and cars at 60mph) the frequency of overtaking and therefore the hazard itself reduces."*

Another said:

" Research ... by Charles C Lave into the relationship between fatality rates, average speed and speed variance on a variety of road types found that there is no statistically discernible relationship between the fatality rate and average speed, but there is a strong relationship with speed variance ... vehicles travelling slightly faster than the mean speed have the least accident involvement... For vehicles travelling 20 mph below the mean speed, the risk is seven or eight times greater than that of a driver travelling at the safest speed... Raising the HGV speed limit to 50 mph would significantly reduce the speed variance between light and heavy vehicles, especially on faster roads, and would thus improve road safety by reducing the opportunities for collisions to occur."

74. 31 responses said either that driver behaviour would still be dangerous or that platooning would still occur, if this speed limit was increased.
75. No-one was able to provide the Department with robust evidence on the effect of platooning on road safety or on the frequency or severity of collisions involving HGVs on single carriageway roads and what effect an increase in their maximum speed limit on these roads would have on safety.
76. Some respondents, like the Department, found that there was no conclusive evidence one way or the other. One council said:

"... during the last five years there were 105 injury accidents on roads in the area ... involving HGVs over 7.5 tonnes on 50 mph and derestricted roads. Speed was only cited as a contributory factor in 17 (16%) of these accidents and the analysis indicates that this was not attributed to the HGV driver in most of the collisions. Whilst it is acknowledged that increasing the HGV speed limit could reduce the occurrence of overtaking manoeuvres, there do not currently appear to be many collisions occurring from such manoeuvres.... It is not possible to state with any certainty as to how many collisions of this nature occur because there is no consistency in the Police recording of incidents as to the type of vehicle that was being overtaken."

Government response

77. The Government has noted the responses and carried out further analysis on the road safety impacts of the change to 50mph. We feel the concerns surrounding the road safety impact of the change should be addressed by the additional measures we are taking forward on road safety, such as considering using the driver conduct process routinely when drivers break the HGV speed limit, and making enforcement against drivers who drive tired easier. We have also raised the Fixed Penalty Notice amount, and will consult on reducing exemptions for HGV operators from operator licensing and roadworthiness requirements, and rules around sideguards. We would encourage local authorities to make

use of their powers to set lower road speed limits in areas of particular concern.

Question 7: Do you have any opinion or evidence on what effect an increase in the maximum speed limit for HGVs over 7.5t on these roads would have on non-HGV vehicle speeds such as car speeds?

- 78. Not all respondents answered the question posed, or their answers were unclear. However of those that did, responses were divided into three categories: an increase would have the effect of increased car / other vehicle speeds (152 responses); there would be no or an insignificant change in car / other vehicle speeds (55 responses); car / other vehicle speeds would decrease (6 responses).
- 79. Of those who said car speeds would increase, there were mixed views as to whether this would be detrimental or beneficial to road safety.
- 80. Some respondents thought HGVs can be intimidating to car drivers and that one reason car speeds would increase is due to HGVs tailgating them.
- 81. Respondents who thought that the result would be either no or insignificant change, or decreased car speeds, thought that car drivers would be happier to travel at 50mph and would maintain a steady speed rather than speeding up to overtake HGVs.
- 82. Many respondents thought that one important consequence of an increased speed limit for HGVs over 7.5t would be improved traffic flow.

Government response

- 83. The Government shares the majority opinion that raising the HGV speed limit will increase non-HGV vehicle speeds and improve traffic flow.

Question 8: The Department invites information on where there are single carriageway roads which are subject to the national speed limit, or are signed at 50 mph, in areas where there are air quality problems.

- 84. There were few respondents who had the information to answer this question and so there were not many responses to question 8.
- 85. Nine councils stated that they do not have any such roads in their areas.

86. One community group, a Parish Council, three private individuals, and a Parish Councillor named between them seven roads that fell into this category.

87. A few respondents gave some further interesting arguments. A Parish Council said:

"The effect of traffic on air quality is most noticeable in towns when traffic is impeded. The difference in the effect whether traffic is travelling at 40mph or 50mph is less marked."

A County Council Councillor said:

"Slow moving traffic is more likely to heighten air quality problems. We have three AQMAs ... as a result of the amount of slow moving traffic."

The Transport Research Laboratory said:

"Air Quality Management Areas (AQMAs) are areas where particular air quality issues, normally NO_x, but sometimes Particulate Matter, have been identified; these may be particular roads or complete boroughs. It is very likely that a proportion of these have single carriageway roads passing through them. In some cases, they may be AQMAs because a motorway or trunk road passes through, rather than this being related to any particular single carriageway."

Government response

88. This complexity of this area is reflected by the responses received. The Government notes the points raised and will encourage local authorities to set lower localised speed limits for roads where air quality may be an issue.

Question 9: What impacts, if any, do you think there will be to the following if an increased speed limit for HGVs over 7.5t on single carriageway roads is introduced?

a) Air Quality Management Areas (AQMAs). Local authorities may have specific evidence on the effect on AQMAs in their authority;

b) EU air quality standards⁷;

c) Noise levels;

d) Areas currently identified as noise hotspots

⁷ <http://ec.europa.eu/environment/air/quality/standards.htm>

89. Not all respondents answered the question posed, or their answers were unclear. However of those that did, responses were divided into six categories: those who felt air quality and noise (the environment) would be negatively affected (103 respondents); those who felt it would increase noise levels (42 respondents); those who felt it would decrease air quality (12 respondents); those who felt the effect on air quality and noise would be negligible or would not be affected (38 respondents); and those who felt it would improve air quality / emissions (16 respondents.)

90. The main reasons why respondents thought the effect on air quality would be negligible or that air quality would even be improved are because many HGVs already travel faster than 40mph, and because HGV technology means HGVs are more efficient at a slightly faster speed. Respondents said:

"Since 1984, the introduction of the Euro 3, 4 and 5 technology models have all worked to reduce the impact of HGV vehicles on the environment. All of our vehicles are Euro 5 Models and are all less than five years old ... We do not believe that increasing the speed limit by 10mphs on certain roads will have a significant bearing on noise pollution. It tends to be when the engine is accelerating that the noise increases."

"A maximum weight HGV is geared to be most efficient at a speed of 50 to 56mph in top gear. At 40mph the engine is running too slow in top gear and too fast in the next gear down. Also vehicle[s] with automated gearboxes can 'hunt' between gears if the driver does not hold the lower gear which can increase fuel consumption and emissions."

91. One road safety group disagreed:

"HGVs travelling at 50mph can use more than 50% more fuel than the same vehicle travelling at 40mph, generating far more greenhouse gas emissions. Road freight currently accounts for 92% of UK greenhouse gas emissions from freight, while transporting only 66% of the freight moved in the UK by weight."

92. In response to the four sub-questions more specifically, a local council said:

"a) We do not expect the proposed changes to have an impact on AQMAs ... All AQMAs are in locations with reduced speed limits through the towns e.g. 30 or 40mph ... b) EU air quality standards could be indirectly impacted by the proposed change ... c) Increases in speed could have a detrimental impact on noise ... Although the number of lorries travelling at a higher speed would be relatively low (and therefore the impact on noise [legislation] would probably be negligible) there would still be an increase in louder single vehicles passing which could increase annoyance."

Government response

- 93.** The Government has noted the points raised and has considered them in the final impact assessment. The Department will encourage local authorities to introduce local speed restrictions in areas of where there are road safety or environmental concerns.

Question 10: If as a result of either of the policy options being implemented there was a reduction in 'platooning' do you think there would be a significant impact on:

a) Noise

b) Air quality

- 94.** Not all respondents answered the question, or their answers were unclear. However of those that did, the most common responses can be categorised as: no / minimal impact (119 respondents); there would be an impact (16 respondents); there would be a detrimental impact to both a) and b) (27 respondents); there would be benefits to both a) and b) (23 respondents).
- 95.** Many disagreed that if the speed limit was increased there would be a reduction in platooning.
- 96.** Many of those who said a reduction in platooning would have no or minimal impact did not say why they thought this. A few said this is because a high proportion of HGVs over 7.5t already travel more than 40mph.
- 97.** Some of those who said that there would be an impact did not say what it would be.

98. Some respondents said that noise would either reduce or would have a different kind of impact, because the noise impact would be briefer at each location.

99. One respondent who thought that there would be benefits to both a) and b) said:

"Increasing speed by reducing platooning will also help to smooth traffic flows reduce braking and acceleration and should therefore have a positive effect on air quality and noise."

Another said:

"Overall noise levels increase with traffic volume, a number of vehicles in a platoon increase both the volume and time of exposure to noise. Thus a reduction in platooning will have an overall positive impact on noise levels. Platooning combine[d] with the prevalence of inappropriately short separation distances can cause drivers to brake with increased frequency. Such frequent braking is associated with increased fuel consumption and this with emissions; this can be exacerbated by forcing or encouraging drivers to select lower gears. Therefore reduced platooning is liable to have a positive impact on air quality."

100. Many of those who gave their opinions on why a reduction in platooning would be detrimental to a) and b) thought this was because:

"Platooning may have an overall beneficial impact on air quality and noise since it helps to reduce average vehicle speeds."

Government response

101. The Government has noted the responses.

Question 11: Do you think either of the policy options goes against the underlying principles of the EU Environmental Noise Directive or of the Noise Policy Statement for England?

102. Not many people answered this question. Of those who did, and whose answer was clear, 84 thought the options do go against the EU Environmental Noise Directive and of the Noise Policy Statement for England; 67 thought they did not.

Government response

103. The Government has noted the responses.

Question 12: Do you think that all of the potential health and social costs of the policy options have been considered in the Impact Assessment? Please provide details if you think costs have not been included.

- 104.** 183 of those who responded to question 12 thought that not all of the potential health and social costs were considered. 51 thought they had.
- 105.** Of those who provided details of what costs they thought had not been included, most were concerned about the effect an increased speed limit would have on non-motorised road users such as pedestrians and cyclists. Most of this group were particularly concerned that the impacts to cycling had not been given consideration. Many people thought that the measures would deter people from using healthier forms of transport and thought that there would be subsequent costs to the NHS. A few people also mentioned the costs to the NHS due to a possible increase in more severe accidents.
- 106.** A few people noted that despite commissioning research on the subject, the Department had not at consultation stage been able to assess what road safety impacts might result if maximum vehicle speed limits for HGVs over 7.5t are increased on single carriageway roads. However some still mentioned it as a concern.
- 107.** Other costs which respondents thought had been omitted from the Impact Assessment included (in no particular order): environmental costs; the impact on rural residents; road maintenance costs; fuel costs and consumption; modal switch; impact on roadside properties; impact on local residents.

Government Response

- 108.** The Government has noted the responses and has considered the points raised in the revised impact assessment.

Question 13: Do you believe an increase in speed for this class of vehicle on these roads will cause more HGVs over 7.5t to use single carriageway roads, which do not currently?

- 109.** About 270 respondents thought that it would; 150 thought it would not. It is worth noting though that many of those who said it would were speculating, while many of those who did not think so were speaking from professional knowledge and experience.
- 110.** Of those who thought that an increase in speed for this class of vehicle on these roads would cause more HGVs over 7.5t to use single carriageway roads than do currently, many were concerned that single carriageways would form part of a quickest route, and mean more of these vehicles would use unsuitable roads. There was widespread

concern among this group of respondents about satellite navigation tools and the role they play in guiding HGV drivers along the quickest route.

111. Of those who disagreed however, respondents said that it was true that HGV drivers always look for the fastest and most direct route, but that these are always motorways and dual carriageways, and HGV drivers do not use unsuitable roads. Single carriageways, they said, would still be time consuming and hence costly, and the topography of single carriageways causes 'interruptions' to journeys. This group said single carriageways are only used when unavoidable and that this is often at the end of the journey, when reaching the destination. They believed this would not change should the speed increase.
112. A few respondents also pointed out that as so many HGVs are currently travelling faster than the 40mph speed limit; they envisage no change to current circumstances.

Government response

113. The Government does not consider that a significant effect will be for more HGVs will use single carriageway roads as a result of raising the maximum speed limit, if faster roads are available, but that HGVs will be able to travel faster when they are using single carriageway roads.

Question 14: Do you think some freight may switch from rail or water to HGVs, if the speed limit is increased on these roads for these vehicles?

114. The split among respondents who thought freight would switch and those who thought it would not was quite even, (166 and 177 respectively).
115. The main reasons why respondents thought freight would not switch from rail or water to HGVs is because other modes are unsuitable or because many HGVs do not comply with the 40mph law currently.
116. One respondent said:

"The majority of rail and water transport consists of volumes or weights that are so high as to be impractical or uneconomic for road traffic and will continue to be unattractive for road transport."

Another said:

"Freight using these other 2 modes are normally high volume and more cost effective to be transported by sea or rail."

And another:

"The current provision for rail freight in the UK isn't particularly good, so only low priority goods or those which are too heavy for the general road network tend to be transported by rail or water. Since these are low priority already or cannot be transported predominantly on the roads for logistical reasons there isn't a commercial reason for it to shift to the road network if the speed limit is increased."

Of those who thought there would be a switch, one said:

"Yes, if routes can be negotiated at higher speed they will become more attractive to hauliers."

And another said:

"We are concerned that this could encourage a modal shift in transport and could encourage more freight onto roads and away from rail and water transport, at a time when transport policy should be shifting in the other direction."

Government response

- 117.** The Government has noted the mixed opinion on the possibility of a modal shift as a result of this change.
- 118.** The Government considers a significant modal shift to road transport as a result of this change unlikely. Freight going by rail is longer distance, so the equivalent road journey or the part of it that is in England and Wales would have a very small proportion of single carriageway roads (compared to dual carriageways and motorways). The impact on overall road journey time would therefore not be enough to influence modal shift.

Question 15: Do you think that there may be added wear and tear on these roads if the speed limit is increased for these vehicles? Local authorities may have specific comments or evidence, with regard to roads in their authority.

- 119.** Most respondents to the consultation answered question 15. A high proportion (about 80%) thought that increased speed would have the effect of added wear and tear on these roads.
- 120.** These respondents thought that added wear and tear would be caused by higher speed and some were concerned about the repercussions for cyclists' safety. Some also thought that roads are already in a bad state and that they would deteriorate further should speed limits be increased for HGVs over 7.5t on single carriageways. Some respondents were also concerned about the cost to councils to repair roads as they thought local councils were struggling to maintain the roads with current budgets.
- 121.** About 20% of respondents thought that there would be no added wear and tear of roads caused by increased limits and many justified this

response with the fact that many HGVs over 7.5t already break the current 40mph limit. Many in this group of respondents also said that the roads are poorly maintained and they did not envisage that they would get any worse.

Government response

122. The Government has noted the concerns expressed.

Question 16: Local authorities have powers to alter speed limits on the local road network, including non-trunk primary routes, in line with guidance set out in Setting Local Speed Limits, DfT Circular 1/06.⁸ Do you think that the increase in the national speed limit for HGVs over 7.5t on single carriageways, would make it more likely that local authorities would introduce more local speed restrictions, and if so on which roads?

- 123.** About two thirds of respondents to question 16 who gave a clear indication thought the measure would make it more likely that local authorities would introduce more local speed restrictions, while about a third did not.
- 124.** Respondents were concerned about the extra costs to local authorities if speed limits were implemented locally, and some of those who thought implementation was not likely thought cost would be a factor.
- 125.** Respondents also pointed out that local speed limits could cause confusion and inconsistencies.
- 126.** Responses varied widely and this seemed to be down to variations in local authority policy.
- 127.** Some respondents also thought the setting of local lower limits was dependent on local campaigning. Some said lower limits would not be set unless collisions occurred.
- 128.** Of local authority respondents, ten thought it was not more likely that local authorities would introduce more local speed restrictions; 14 thought it was (more of these were Parish Council representatives.)
- 129.** One council said:

⁸This publication was revised 18th January 2013 (ref: DfT 01/2013)

<http://www.dft.gov.uk/publications/local-speed-limits-guidance/>

This revision provided updated guidance and introduced a 'Speed Limit Appraisal Tool' to assist local councils to assess the full costs and benefits of any proposed local speed limit schemes.

<https://www.gov.uk/government/publications/speed-limit-appraisal-tool>

"[Our] road network is of such a size with only two sections of principal dual carriageway ... and two short sections of principal single carriageway ... our network would not encourage HGVs to use other single carriageway roads and therefore further speed restrictions would not be required."

130. One police force said:

"...Speed limits are not generally set to target specific vehicle types but with all road users in mind. Although any increase in HGV speed limit may increase demand for reduced speed limits on routes used by HGVs in more rural locations, such limits are likely to require enforcement to achieve acceptable levels of compliance. The introduction of reduced speed limits for example in villages, to reduce traffic speed of HGVs could as a consequence see increased non compliance by other vehicle types, i.e. cars, creating an unnecessary and avoidable enforcement burden."

Government response

131. The Government notes the responses. The Department for Transport has updated the circular 'Setting Local Speed Limits' which gives advice to local authorities on setting local speed limits.

Question 17: If you are an organisation that provides information and you believe that an increased speed for this class of vehicle on single carriageways would incur costs for your organisation in the form of publicity or conversion costs please indicate what these may be. Also please advise whether these costs would be reduced given a lead-in time between announcement and policy implementation as a result of costs being rolled into existing plans.

132. Only four organisations said a change would result in their organisation incurring costs.

133. One local authority said:

"...these proposals ... [put] an area such as [ours] in a difficult position. There are many HGVs travelling on single carriageway national speed limit routes through [our county] ... between Scotland and England. All the boundaries would require signing; otherwise drivers could be unaware of the change in speed limit policy between one country and another. Signing would incur costs..."

Another local authority said:

"This would be dependent on how a single carriageway is defined and the strategy for signing them."

134. A cycling group said:

"This would incur costs to us in that we would need to advise our member groups."

135. A health and safety organisation said:

"[We provide] road safety advice and information, which includes road safety issues related to HGVs and speed limits. If speed limits for HGVs were changed [we] would need to change its advice and information accordingly. However, this is unlikely to result in any significant costs, other than staff time, as most of our information is provided electronically or over the telephone and we update this information regularly. We may have to discard printed stock of some educational posters."

Government response

136. The Government has noted the information provided and has revised the impact assessment.