



Department
for Transport

Examining the Maximum Speed Limit for Tractors on Public Roads

Consultation Response Summary

October 2014

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Part 1 - Introduction

- 1.1** A report¹ by the Independent Farming Regulation Taskforce was published in May 2011 and includes recommendations that the Government examine the maximum weights of agricultural trailers and combinations and the maximum speed of conventional² tractors. These recommendations fell under the Department for Transport's (DfT) remit.
- 1.2** The consultation to examine the maximum weights of agricultural trailers and combinations was published separately. This consultation document concentrates on examining the maximum speed for regular tractors.
- 1.3** The Road Vehicles (Construction and Use) Regulations 1986 specify maximum speeds for regular tractors. Currently, the maximum speed is 20mph. The Farming Taskforce report concluded that the current limits do not reflect the capabilities of modern machinery, and that in other EU countries there are higher speed limits for regular tractors and this suggests there might be a competitiveness issue between UK farmers and those in the rest of the EU.
- 1.4** The report recommended to Government that the maximum speed of tractors be increased from 20mph to 25mph (Option 2).
- 1.5** The Impact Assessment (IA) summarised the monetised costs and benefits by Option and Scenario and was published with the consultation document.
- 1.6** In the consultation we sought views on:
 - a) Your preferred policy option or further options
 - b) The balance of savings and costs
 - c) The impact of tractor speed on road safety
 - d) The impact of tractor speed on road wear and tear
 - e) Implementation costs
 - f) Fuel consumption
 - g) The impact on small firms
 - h) The impact on haulage industry
 - i) Compliance
- 1.7** The consultation document was published on 7 November 2013 and ran for 12 weeks until 30 January 2014.
- 1.8** Table of Questions

¹ <https://www.gov.uk/government/publications/independent-farming-regulation-task-force-report>

² Some tractors have a current speed limit of 40mph due to higher technical requirements. We did not propose to alter this.

No.	Question
1	Policy option 1: Do nothing – this means not changing the law and the speed specified in the C&U Regs remaining at 20mph. Is this your preferred policy option? Please explain your answer.
2	Policy option 2: Increase the speed specified in the restriction to 25mph. This is currently the speed limit in some other EU countries. Is this your preferred policy option? Please explain your answer.
3	Would you suggest the speed specified be different? Please specify your preference and explain your answer.
4	We welcome views from stakeholders about whether they feel the balance of savings and costs of different speed detailed in the Impact Assessment reflects their own experience or expectations.
5	Please provide any evidence on the frequency or severity of collisions on public roads involving conventional tractors which can only be driven at 20mph or less because they do not comply with the necessary regulations to drive any quicker, and whether an increase in this restricted speed on these roads would have an effect on road safety and other road users.
6	Please provide any evidence on what effects if any the policy will have on road wear and tear and road maintenance requirements.
7	Do you think there will be a direct transition cost of implementation which government or the private sector will incur as a result of the change to the speed restriction? Please provide any evidence or figures you may have.
8	Please provide any evidence on the impact of this proposal on fuel consumption.
9	How do you think the proposals will impact on small firms?
10	Do you think that an increased speed limit would lead to a shift from other modes of haulage into agricultural haulage?
11	Please provide any evidence you may have on the number of drivers of conventional tractors who fail to comply with the 20mph speed limit.
12	Do you think that all of the potential costs and benefits of the policy options have been considered in the Impact Assessment? Please provide details if you think costs or benefits have not been included.
13	Do you think there is any need to review the speeds that agricultural motor vehicles other than tractors (e.g. combine harvesters) are subject to? If so, please provide your suggestions or comments.

Part 2 - Executive summary

- 2.1** The Department received 307 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.
- 2.2** Not all respondents indicated an organisation or sector. However, from the information provided respondents were broadly categorised into 12 main groups as follows:

Table 2.1	
Organisation	Number of Responses
Trade Organisation - Farming	5
Trade Organisation - Agricultural engineers/manufacturers	2
Trade Organisation - Logistics	2
Agricultural engineers/manufacturers	8
Logistics	1
Local Authority/Parish Council	6
H&S/Road Safety	2
Farm/Farming related	90
Police	1
Consultancy	1
Others/individuals	126

Blank	32
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- 2.3** Respondents (around 85%) were generally in favour of increasing the speed limits for tractors. Around 29% of respondents supported policy option 2 to increase the speed limit to 25mph however the majority supported increasing the speed limit to an alternative speed. The most popular alternative speed proposed was 30mph.
- 2.4** The majority of respondents agreed with the impact assessment (IA). However, a few thought that not all the costs and benefits of the proposal are considered in the IA – primarily they thought that benefits were exaggerated and additional costs would be incurred in relation to road safety and maintenance.
- 2.5** The majority of respondents did not think there would be any transition costs but around one third did think there will be transition costs. Opinion on whether these costs would be incurred by the private or public sector was split half and half.
- 2.6** A little more than half of respondents thought that the proposal would have no or minimal impact on small firms and a little less than half thought there would be an impact on small firms (mostly, this was thought likely to be a positive impact as opposed to a negative impact).
- 2.7** There was little evidence offered in relation to collisions caused by tractor speed. The majority of those that answered relied on their own experience or anecdotal evidence and believed that a cause or contributory factor of collisions is that tractors travel too slowly.
- 2.8** There was little evidence offered in relation to the effects of the proposal on road wear and tear. Of those respondents that answered, the majority believed that an increase in speed would reduce or have minimal impact on road wear and tear. Around one third of respondents were concerned that an increase in speed would increase road wear and tear.
- 2.9** The vast majority of respondents believed that fuel consumption would decrease or there would be no impact at all. Around 12% believed fuel consumption would increase and notably these were all private individuals.
- 2.10** The vast majority of respondents did not think the proposal will lead to shifts in modes of haulage to agricultural haulage.
- 2.11** There was little quantitative evidence offered in relation to compliance however, Police Scotland evidence indicated 100% non-compliance by tractors with the current speed limit in a particular (limited) study that they conducted. Anecdotal evidence offered by other respondents also suggests that levels of non-compliance with the current 20mph limit are high.
- 2.12** Opinion was split in half with regard to whether there is a need to review other agricultural vehicles' speed limits. The most popular vehicles proposed for review were combine harvesters and self-propelling vehicles.

Part 3 - Detailed Summary of Responses

Q.1: Policy option 1: Do nothing – this means not changing the law and the speed specified in the C&U Regs remaining at 20mph. Is this your preferred policy option? Please explain your answer.

3.1

Table 3.1	
Q.1 Do Nothing	Number
Yes	52
No	96
Blank	158
Total	306

3.2 The majority of respondents that answered this question did not support policy option 1.

- 65% of respondents were not in favour of maintaining the current speed limit for tractors. Of those who were not in favour, 41% were private individuals; 38% were farmers, 6% were unions or trade associations; 5% were manufacturers.
- All unions and the majority of trade associations agreed that the current speed limit should not be maintained and 88% of farmers are against retaining the current speed limit.

3.3 Common reasons for answering 'no' were:

- The belief that the current law is out of date as tractor technology has progressed since drafting of current legislation (in particular, suspension and brake design).
- The belief that the current law causes inefficient transport times which creates increased production costs and increased time on roads.
- The fact that often the current speed limit is not observed and it is not well enforced.

- Benefits to road safety since other road users will be less frustrated and less likely to overtake.

3.4 Examples of some of the views expressed by those not in support of policy option 1 are:

Private individual - "The speed limit for agricultural vehicles hasn't been reviewed for 27 years. This leaves UK farming at a disadvantage to the rest of Europe. Tractors & trailer design has hugely improved in this time, inheriting many features from HGVs to improve road safety. Traffic on all roads has increased and tolerance for slow moving vehicles has reduced. The speed limit needs to be safely increased to satisfy all road users."

Interest Group- "This is not [our] preferred position. The regulations relating to maximum speeds for agricultural vehicles on the road have not changed for 27 years, and are not fit for purpose. The regulations do not reflect the significant changes that have taken place in agricultural machinery in this time, and it would be counterproductive to the efficiency of agricultural businesses if the speed limit is not raised. The current restriction of 20mph has meant that farm businesses have had to operate machinery at unnecessarily slow speeds on the roads. This has not only added to congestion on roads but it also represents a safety risk because of the difference in relative speeds between agricultural vehicles and other vehicles."

Farmer – "This would not be my preferred policy option, not changing the law results in inefficient transport of crops from field to farm, causing increased production costs, and increased time on the roads. Not changing the law does not reflect the huge increases in technology that have taken place since the introduction of the law. These advances include air brakes on tractors and trailers allowing more efficient stopping ability as well as advances in tyre technology, standard brake systems and running gear."

3.5 A minority of respondents support policy option 1 - to do nothing.

- 35% of respondents who answered this question were in favour of maintaining the current speed limit. Of those who were supportive of maintaining the current speed limit of 20mph, 56% were private individuals; 12% were local or parish councillors; 10% were farmers and; 6% were from various interest groups.

3.6 Common reasons for answering 'yes' were:

- The risk to road safety caused by drivers lacking in proper training or experience, insufficient standards of tractor and trailer maintenance and/or poorly surfaced roads.
- The risk to rural residents, particularly children and elderly people and the negative impact on rural communities as a result of damage to roadside verges
- The risk that an increase in speed limit would not deter motorists from overtaking slow tractors but rather would result in them overtaking at a faster speed or taking longer to do so, consequently spending longer on the wrong side of the road.
- The fact that the current speed limit is often not respected, meaning that there is a risk an increased speed limit would not be respected either.
- Lack of enforceability – this was mentioned in relation to lack of current enforcement of the speed limit and the potential difficulties of enforcing an increased speed limit.

3.7 Examples of some of the views expressed by those in support of policy option 1 are:

Council – “I favour the keeping of the current option. My council ward has strong rural elements and several settlements whose properties directly face the road. Residents often complain that farm tractors and transport travels frequently and often at speed. The vehicles carry more load than in the past. Roadside verges are frequently churned up and damaged by these vehicles. Enforcement through the police is very much absent and increases in speed will lead to these issues being compounded, which will affect residents in rural communities greatly.”

Private individual – “Yes, with proactive enforcement of the limit. Tractors travelling at 20mph are easier to overtake in lower powered cars, with less time on the wrong side of the road. The standard of tractor & trailer maintenance on many farms is insufficient for higher speeds together with young & often inexperienced drivers in the harvest period.”

Parish councillor – “As a parish councillor in a rural area I strongly disagree in increasing the speed limit of agricultural vehicles...Once the limited has been raised it will not come down, even if children are killed...Outside our village primary school, we have been advised we cannot apply a speed limit because it is an unclassified road. Even now the tractors go too fast, but if speed limiters are removed what will be the consequences.”

Q2. Policy option 2: Increase the speed specified in the restriction to 25mph. This is currently the speed limit in some other EU countries. Is this your preferred policy option? Please explain your answer.

Table 3.2	
Q.2	Number
Yes	191
No	33
Blank	82
Total	306

3.8 A majority of respondents support policy option 2 – increasing the speed limit to 25mph. However, of those that responded positively to this question, most would prefer a speed limit higher than 25mph (as detailed in Q3).

- 85% of respondents agreed with the proposal to increase the current speed limit. However, only 29% of respondents supported increasing the current speed limit to 25mph. The majority proposed an alternative speed (see Q3).
- Farmers were more likely than any other group of respondents to support a speed limit increase. 95% of farmers support some form of increase to the current speed limit however the majority of these (60%) support increasing the speed limit to more than 25mph.
- Farmers were more likely than other groups of respondents to propose a multi-tiered system and the implementation of conditions in tandem with the speed increases.
- 24% of those farmers that are in favour of a speed limit increase, support a multi-tier system with various speeds from 25mph and above applying in different circumstance (primarily, the maintenance, age, purpose, and safety features of the tractor).
- 34% of farmers in favour of some form of increase suggested that such an increase come with conditions (including MOT style performance test; the age of the vehicle; training and age of the driver).

3.9 Examples of some of the views expressed by those farmers in support of an increase in speed limit are:

“I would strongly propose a 50kph limit if certain criteria is met for example: only tractors with front suspension, twin line air brakes, a break test conducted on new tractors and manufactures would be responsible to make sure there tractors would meet this standard.”

“My view is that the law should be upgraded to the following:

For tractors and trailers with a GVW of about 35T: 1. Speed limited to 25mph; 2. Trailers should be fitted with commercial brakes but not air brakes; 3. Trailers must have load compensation valves to stop wheels locking up when trailer is empty; 4. No annual test. For tractors and trailers with GVW up to 50T: 1. Speed limited to 40mph; 2. Tractor and trailer must have air brakes and ABS; 3. Tri axle on trailer; 4. Full air suspension on trailer; 5. Annual test on tractor and trailer”

3.10 Interest groups generally supported the introduction of conditions with any increase in speed. For example:

“[We do] not believe that the speed limit should be increased without a robust procedure in place to ensure the adequate roadworthiness and proper maintenance of such equipment. Such a procedure should be compulsory and not voluntary. [We] would also want a system in place to ensure that operators received training for the safe operation of such equipment on the public roads and an understanding of the effect on breaking and control of such vehicles during different weather/road conditions including basic roadworthiness checks.”

3.11 A minority of respondents did not support policy option 2.

- 15% of respondents did not agree with the proposal to increase the current speed limit.
- Private individuals were more likely than other groups to disagree with an increase in speed. 19% of private individuals that answered this question disagreed with the proposal.

3.12 For examples of the reasons given, see Question 1.

Q3. Would you suggest the speed specified be different? Please specify your preference and explain your answer.

Table 3.3	
Q.3	Number

Yes	95
No	3
N/A (want current)	8
Blank	200
Total	306

3.13 The majority of respondents that answered this question proposed an alternative speed to the proposed 25 mph (40km/h). 30 mph (50km/h) was the most popular alternative speed limit. A number of respondents suggested speed limits in km/h and therefore we have grouped them to an appropriate mph equivalence.

- 90% of respondents that answered this question proposed an alternative, preferred speed limit although some of these proposed a multi-tier system that included 25 mph as one of the tiers.
- 81% of respondents proposed a speed limit higher than 25 mph and 2% want a speed limit lower than the current 20 mph speed limit.
- 12% of those in favour of a higher speed limit proposed some form of multi-tiered system (nearly half of these included 25 mph as one of the tiers).
- 10% of respondents supported the use of tests in conjunction with a speed increase.

3.14 The most common proposed alternative speeds were:

- 60% of respondents supported raising the speed limit to 30 mph (50km/h)
- 2% supported 37 mph (60km/h)
- 6% supported a multi-tier system with speeds up to 30 mph (50km/h)
- 7% supported a multi-tier system with maximum speeds from 31-37 mph (51-60km/h)
- 5% supported a multi-tier system with maximum speeds from (38-43 mph) 61-70km/h
- 2% supported a multi-tier system with maximum speeds from 71-80km/h (44-50 mph)

3.15 Examples of some of the views expressed by those who proposed an alternative speed limit are:

Individual - “As previously stated, a limit of 50km/h would be more appropriate. Most tractors now have the ability to travel at 50 km/h quietly and safely. They have modern suspension systems that are appropriate for such speeds and braking systems from the HGV industry. A tractor travelling at 50 km/h blends in with the speed of other road users, reducing disruption, anxious behaviour and the frequency of collisions.”

Individual - “I would suggest a tiered system... e.g. a hydraulic braked system to be 40km/h, an air braked system to be 55km/h and an air braked with abs correct suspension and tyres at 80km/h.”

Farmer – “My suggestion would be a 2 class system. Class A: tractors are permitted to travel at 50km/h; trailers must have air breaks; trailers must pass a yearly mot style test to insure they are safe. Class B: tractors are permitted to travel at 40km/h; no mot required the same as the current rules but drivers/owners must ensure they are road worthy. This idea would allow smaller farmers to operate efficiently within the 40km/h law without any problems and would allow large farmers/contractors who have larger more capable tractors and are on the road more often the chance to travel faster when possible but with some kind of testing.”

Q4. We welcome views from stakeholders about whether they feel the balance of savings and costs of different speed detailed in the Impact Assessment reflects their own experience or expectations.

Table 3.4	
Q.4	Number
Yes	38
No	24
Other	1
Blank	229
Total	292

3.16 The majority (227 – 78%) of the respondents did not answer this question or did not comment on the Impact Assessment (IA). Of those that did respond, most agreed with the IA.

- 38 agreed with the balance detailed in the IA (23 from agricultural background 12 private individuals, 1 logistics 1 local council, and 1 charity).
- 24 respondents disagreed with the balance of costs and benefits.

3.17 The reasons given by respondents that disagreed with the IA because they believed the benefits to have been over-estimated are:

- Because the vehicles in question already travel at higher speed than currently permitted or because the road network won't allow the vehicles to travel at the higher speeds (5 respondents put forward these views);
- because the costs in road and verge maintenance should be higher (4 respondents put forward these views);
- because the cost to road safety should be higher (6 respondents put forward these views);
- because the cost of buying new vehicles and fuel consumption should be higher (1 respondent put forward this view).

3.18 Examples of views expressed are:

“There would be little or no impact. Modern tractors are already traveling at 40km/h and above. The change in the law would just make it legal”

“There would be no savings to the farmer by increasing speed limits, however there would be an increased cost to County Councils for the road repairs, and to local house holders for repairs to their property, resulting in the severe vibrations and shaking their houses are subjected too, also the likely increase in council tax to cope with increased road repairs.”

“[...] believes that any balance of saving and cost should take into consideration the cost of accidents and fatalities caused by agricultural vehicles on the public road without the precautions mentioned in our response to questions 1 and 2.”;

“Travelling 25% faster at 25mph requires the use of a larger & more (up to 50%) powerful tractor to pull the same weight of load than at 20mph which increases operating costs through greater fuel use & higher purchase cost of the tractor.”

3.19 The reasons given by respondents that disagreed with the IA because they believed the benefits to have been under-estimated are:

- because of being able to operate with fewer tractors per job;
- because of reduced traffic;
- because of improved road safety.

3.20 Examples of the views expressed are:

“I believe the savings as set out in the Impact Assessment are under rated as it does not take into account the ability for a business to operate with less tractors per job allowing those tractors to do other jobs in fields. This would allow a more efficient use of time which is likely to increase yields due to optimum timing conditions being met more often for a variety of tasks.”

“yes the saving is one aspect but also the safety for other road users, nothing as bad as slow tractor on a country road, if the same tractor is moving at say 50kph, when safe, then the motorist not so frustrated”

Q5. Please provide any evidence on the frequency or severity of collisions on public roads involving conventional tractors which can only be driven at 20mph or less because they do not comply with the necessary regulations to drive any quicker, and whether an increase in this restricted speed on these roads would have an effect on road safety and other road users.

3.21 The majority of respondents were not able to provide quantitative evidence however many offered anecdotal evidence and the majority of these respondents believed that collisions are caused because tractors travel too slowly.

3.22 87 responses to this question were received and the majority did not have quantitative evidence on the frequency or severity of collisions on public roads involving conventional tractors which can only be driven at 20mph or less.

- Based on their own experience, opinion or anecdotal evidence, 45 respondents asserted that a cause or contributory factor to collisions is that tractor speed is too slow. Broadly respondents attribute this to one of two factors; overtaking or speed differentiation. These respondents believe that road safety would be improved with an increased speed limit.
- Based on their own experience, opinion or anecdotal evidence, 5 respondents believe that a cause or contributory factor to collisions is that tractors travel too fast. These respondents believe that road safety would be negatively affected with an increased speed limit for tractors.

3.23 Examples of some of the views expressed by respondents are:

Farming Organisation- “[A]necdotal evidence from members suggest that most accidents involving tractors are turning off public roads or being hit by vehicles from behind. Increasing the speed of the tractor will decrease the potential severity of accidents due to speed differentials.”

Farming Organisation: “We hold no data on the frequency or severity of collisions on public roads involving conventional tractors driven at 20mph or less. However through discussion with our membership it is clear anecdotally that near misses are fairly common. Such incidents normally relate to other motorists overtaking at inappropriate moments, such as approaching bends and other situations where visibility is reduced, but also where the combination is slowing to turn into a field.”

Farmer - “There is an argument that mismatched speed is one of the greatest contributory factors to road incidents; the accident rate for these vehicles is highest on single carriageways where the vehicle specific speed limits range from 20mph for tractors to a 60mph signed road speed. Between 2005 and 2012, the proportion of accidents involving all vehicles (other than agricultural ones) for which ‘Driving too slow for conditions’ was listed as a factor contributing to the accident relative to all accidents involving the same vehicles was – on average – 0.1%. The same ratio for Agricultural Tractors is 2.7%, suggesting that slow speeds are a disproportionately larger problem for Agricultural Tractors than other vehicles. Between 1989 and 2012, the proportion of accidents involving all vehicles (other than agricultural ones) for which “overtaking moving vehicle on the offside” was listed as a manoeuvre occurring during the time of the accident relative to all accidents involving the same vehicles was (on average) 4.1%. The same ratio for agricultural tractors over the same period is 20.9%. Furthermore, for approximately 90-95% of the accidents involving tractors (for which this manoeuvre is listed), it was the other vehicle overtaking the tractor (and not the other way around). This suggests that tractors being overtaken is an issue which could be mitigated by allowing them to driver faster.”

Enforcement body: “Anecdotal evidence does suggest that an increase in the speed limit may reduce frustration whilst still allowing other road users to overtake without exceeding speed limits.”

Trade Association: “..there will undoubtedly be a reduction in road safety because the braking performance of many tractors and trailers were designed to meet the 25% minimum performance at 20mph. A 5mph increase will increase the kinetic energy of the combination by 64% and in many instances braking systems of both tractors and trailers will not be able to cope with this additional energy input. The industry has submitted a proposal (ATTS) that would require both tractor and trailer to have passed an annual inspection in order to qualify for the higher speed. This would require the tractor unit to have a minimum 50% braking efficiency and for trailers the efficiencies required are; in the case of balanced 50%, and 45 % in the case of un-balanced.”

Q6. Please provide any evidence on what effects if any the policy will have on road wear and tear and road maintenance requirements.

3.24 No respondents provided quantitative evidence of the effects the policy could have on road wear and tear however the majority believed that a speed increase would reduce wear and tear or have a minimal impact on it.

- 19 other respondents (8 agricultural, 1 council, 9 individuals, 1 education) think that an increased speed would lead to a reduction in road wear and tear:

“The vehicles are no heavier than a fully loaded LGV and as most larger trailers with large tyres would feature steering axles, there would be far less 'scuffing' than a traditional lorry with 3 fixed axles at the rear.”

- 36 respondents (23 agricultural, 11 individuals, 1 council, 1 rural association) think that the speed increase will have no impact:

“This will have no effect as the same weight will be transported but in a more efficient manner”

“No evidence. However it is common practice for agricultural tractors to regularly operate at speeds of 25 mph and above, so no change is predicted.”

- 13 respondents (10 agricultural, 1 individual, 2 local council) think the policy would have minimal impact on road wear and tear:

“We consider that the impact on road wear and tear will be negligible. As previously mentioned some tractors are already legally authorised to travel at 40mph when towing a trailer. These combinations have been in use for decades (since 1991). We are not aware of any damage or wear or tear to the road surface from these vehicles.”

- 24 respondents (1 charity, 1 safety group, 2 logistics 4 local councils, 14 individuals and 2 rural residents) said that a speed increase would lead to increase in road wear and tear. Of these, 16 also mentioned damage to road verges, with one respondent also mentioning damage to drains.

“The weight and width of these vehicles is seriously damaging the roads and particularly verges on our minor roads. Our local council is struggling to maintain these carriageways.”

“Agricultural vehicles travelling faster will inevitably impact, breaking road edges and verges and as a consequence resulting in greater contamination of the road surface. We do not feel qualified to comment on the extent of any increase in general road wear, although we note the pressure on road maintenance budgets, not least in rural areas.”

“Raising the speed limit through villages and small hamlets would add to the already bad condition of the roads. Tractors have to pull to one side for oncoming traffic and this damages drains and road edgings, thus creating potholes.”

Q7. Do you think there will be a direct transition cost of implementation which government or the private sector will incur as a result of the change to the speed restriction? Please provide any evidence or figures you may have.

3.25 105 respondents commented on this but only a minority answered relevantly to the question asked.

- 58 respondents envisaged no transitional costs (29 agricultural, 24 individuals, 1 charity, 3 local councils, 1 rural resident).
- 10 (6 individuals and 4 agricultural) thought there would be only transitional costs if a compulsory test was introduced, but then identified ongoing, rather than transitional costs.
- 21 respondents (7 agricultural, 1 haulage, 10 individuals, 2 local councils, 1 charity) thought there would be transitional costs however most then identified ongoing rather than transitional costs which are accounted for under questions 4 and 12. Of those that identified transitional cost, a few respondents identified upgrading of equipment as a transitional cost to farmers and information campaigns as a transitional cost to government.

3.26 Examples of the views expressed are:

“The private sector may incur costs as farmers who decide to take advantage of any increase in speed may, as a consequence, need to upgrade systems or tractors and trailers to meet minimum performance criteria at higher speeds.”

“There would be a direct transition cost of implementation, as yet un-quantified, accruing to both government and the private sector as a result of the speed limit change. For example, government (central and local) would incur some publicity costs where literature and publications will need to be updated to reflect the new vehicle speed limit.”

Q8. Please provide any evidence on the impact of this proposal on fuel consumption

3.27 67 respondents answered this question however the majority offered anecdotal rather than quantitative evidence.

3.28 Of the respondents that answered:

- 66% believed that fuel consumption would decrease should the speed limit for tractors increase;
- 12% believed that fuel consumption would increase should the speed limit for tractors increase and;
- 22% believed that there would be no impact on fuel consumption should the speed limit for tractors increase.
- None of the farmers that answered this question believed there would be an increase in fuel consumption. Rather: 70% believed an increase in speed limit would reduce fuel consumption and 30% believed there would be no difference to fuel consumption should the speed limit be increased.
- Similarly, no representatives from trade associations, machinery dealers, the logistics industry, consultancies, engineers or local government believed there would be any increase to fuel consumption as a result of an increased speed limit.
- 26% of private individuals that answered this question believed there would be an increase in fuel consumption however the majority, 61%, believed there would be a decrease in fuel consumption should the speed limit increase and 16% believed fuel consumption would not change with the proposed speed limit.

3.29 The responses that provided most evidence were:

Individual - “Modern tractors travelling at 50kph at 1650revs saves fuel. Trial in Germany with Merc-unimog showed 40% saving in fuel over conventional tractors.”

Farmer - "It is difficult to establish how fuel consumption will change in response to the speed limit change proposed, in part because there is no fuel consumption equation which explains how fuel consumption varies with respect to changes in the average speed of an agricultural tractor. It could be assumed that as vehicles travel faster they consume more fuel per unit of distance travelled. Interestingly however, this might not be the case. It is true that above a certain speed the faster a vehicle travels the more fuel it will consume. However at relatively slow speeds it is possible that this relationship is inverted. For instance using the fuel consumption equation and parameters from Web Tag – the speed at which fuel consumption per kilometre travelled is minimised for "OGV1" vehicles (which includes 2 and 3-axle rigid HGVs) is 64 km/h (or 39.8 mph)."

- 3.30** Mostly respondents offered their own thoughts or opinions as to why this proposal would, or would not, impact on fuel consumption:

Farmer - "My supposition is that tractors may become larger and faster but that there will be fewer of them. On balance, the effect will be neutral."

Individual - "Tractor manufacturers do not generally provide fuel consumption figures at road speeds, however many tractors that are capable of travelling at 40 or 50 kph generally do so at reduces RPM of 1600 or 1700 rpm, much lower than their rated speed of 2100 or 2200 rpm, therefore tractors would be travelling at optimal engine speeds for best economy."

Q9. How do you think the proposals will impact on small firms?

- 3.31** Although 131 commented on this question, only 126 (57 agriculture, 2 charities, 1 haulage, 55 individuals, 6 local councils, 1 road user, 1 rural association, 3 rural residents) indicated whether they thought there would be an impact on small firms.
- Just over half of respondents (50) that answered this question thought there would be no or minimal impact on small firms and just less than half thought there would be some impact on small firms (59).
 - Almost all of those that thought there would be an impact on small firms thought the impact would be positive:

“It will help them to be more competitive, better utilise their existing tractors, lessen their time on the road and help them to be more responsive and agile”.

“I consider my business to be a small firm, it has one full time employee. It will be of significant benefit to us, as it will increase the efficiency of operations by reducing road transit times. It will allow more field and harvest work to be done, which is the work that pays.”

“I think that this will allow me to save some capital on haulage costs by allowing me to utilise large vehicles for onwards transport”

“I believe the proposals will have a huge impact on small firms, allowing them to keep up with the bigger players in the industry with advancing technology due to reduced costs incurred through travel time at harvest and other times when a lot of road work is necessary.”

- A small minority believed there could be a negative impact on small farms:

“It will increase their operating costs by a much larger % of total fixed costs than the increase for larger farm units”

“Trying to keep up with new equipment would be costly and could lead to free tax being disbanded”

Q10. Do you think that an increased speed limit would lead to a shift from other modes of haulage into agricultural haulage?

Table 3.5	
Q.10	Number
Yes	17
No	108
Maybe	3
Blank	179
Total	307

3.32 The majority of respondents did not believe the proposal will result in a shift of haulage modes.

- 84% of respondents do not think that an increased speed limit would lead to a shift from other modes of haulage into agricultural haulage.
- 15% of respondents think that an increased speed limit would or might lead to a shift towards agricultural haulage.

3.33 The main reason that respondents answered ‘no’ was that:

- An increase from 20mph to 25mph is too small to make a difference as this is too slow for HGVs.

Farming organisation – “[We consider] that this is unlikely to occur in any large scale. Tractors are designed for off road use, and have design features which make them far less fuel efficient than other modes of road transport. Transporting produce over longer distances is uneconomic in comparison to other modes of transport. In addition to this, regulations such as Operator Licencing, red diesel, and Tachographs will all serve as a disincentive to using agricultural machinery for haulage.”

Interest Group- “...the proposed increase of 5mph is very unlikely to encourage existing haulage businesses to come under the definition of agricultural haulage businesses. Existing haulage businesses would not see any benefit from being able to travel at a maximum speed of 25mph for the type of work that they currently undertake. Most haulage businesses would expect to travel at greater speeds to cover greater distances than farm businesses, and the benefits associated with being defined as ‘agricultural’ would not be worth having to travel at this revised speed. Even if haulage firms sought to come under the definition of agricultural businesses they would still be subject to the legislation surrounding licensed hauliers. The Goods Vehicles (Licensing of Operators) Regulations 1995 state clearly which vehicles and businesses must be licensed good operators, outlining maximum distances permitted to haul produce. Even if haulage firms were attracted by the increased speed limit for tractors, they would still have to be compliant with all relevant goods vehicles regulations, if they intend on hauling produce over 15 miles. As the majority would expect to haul produce over this distance, the CLA can see no incentive for them to revert to use of agricultural machinery. The only significant incentive for hauliers to be classified as agricultural businesses is fuel. Haulage activity in question has to be classed for agricultural purposes, in order to qualify for rebated (red) fuel. Most hauliers will not be undertaking agricultural activity and therefore would not be permitted to use rebated fuel.”

3.34 The main reasons that respondents answered 'yes', including some representing haulage interests, was:

- there would be financial advantages in shifting towards agricultural haulage.

Trade Association: "Unquestionably, this would impact on well-regulated, professional hauliers and their drivers, who would see a reduction in their business. Their investment would be undermined and overheads would be increased, which would impact on other haulage customers.

Farmers would be encouraged to do their own transport as opposed to using a haulier and would be significantly encouraged to travel longer distances within the 15 mile radius referred to above. We fear that illegal operation beyond the legal radius limit will become a greater temptation, highlighting again the need for enforcement. This is especially relevant to SME and micro hauliers providing specialised services in rural areas.

However, operations of agricultural tractor/trailer combinations at speeds well above the current legal limit are already a widespread reality, members tell us and where that is the case increasing the legal limit will have little discernible impact. There would be a beneficial impact were the increase in the legal limit to be accompanied by much-needed quality licensing and enforcement."

Q11. Please provide any evidence you may have on the number of drivers of conventional tractors who fail to comply with the 20mph speed limit.

3.35 There were 119 responses to this question. The vast majority of these responses provided anecdotal evidence that suggests it is common practice for tractors to fail to comply with the 20mph speed limit.

3.36 Police Scotland provided quantitative evidence of this:

Police Scotland: "Almost all tractors travelling on public roads are capable of travelling in excess of 20mph. Checks were carried out in test areas where 100% non-compliance was noted. Travelling in excess of the 20 mph restriction has implications regarding the minimum braking requirement of the tractor and any trailer or trailed appliance being towed, as the legal braking efficiency is much higher. Over a recent three month period in one test area checks showed that there were no tractors travelling below 20 mph however in excess of 75% of these tractors were found to have serious brake defects which resulted in immediate prohibitions being issued."

Q12. Do you think that all of the potential costs and benefits of the policy options have been considered in the Impact Assessment? Please provide details if you think costs or benefits have not been included.

Table 3.6	
Q.12	Number
Yes	33
No	24
Blank	237
Total	294

3.37 The majority of the respondents (80%) did not comment or answer the question. Of those who did, just over half felt that the IA did consider all costs and benefits while just under half did not feel that the IA considers all the costs and benefits.

- 61% of respondents did feel that all the costs and benefits were set out in the IA.
- 39% of respondents did not feel that all the costs and benefits were set out in the IA
- The majority who did not feel that all the costs and benefits were set out in the IA believe that there are additional costs to consider such as the impact on local tourism; the negative impact on the environment in rural areas; higher contract charges; costs for repairing and maintaining roads and verges; enforcement costs; accidents and injuries
- Some respondents noted potential additional benefits such as lower food prices; improved vehicle roadworthiness and the industry benefits of requiring less vehicles.

3.38 Examples of some of the views expressed by respondents are:

“Consider amenity effects, such as a tourist destination losing its attractiveness because of noise, destruction of environment, dangerous vehicles etc.”

“Has the cost of damage to the road surface, drains and verges been adequately dealt with.”

“One of the important issues in this policy area is enforcement. Levels of enforcement related to fair competition and managing road risk are inadequate at present but the need would become substantially more pressing were an increase in speeds to be allowed. This would involve additional costs. We are concerned that this no-where reflected in the impact assessment either in terms of costing or funding”

“[...] believes that an impact assessment of the costs or benefits should include the cost of accidents involving agricultural vehicles on public roads.”

Q13. Do you think there is any need to review the speeds that agricultural motor vehicles other than tractors (e.g. combine harvesters) are subject to? If so, please provide your suggestions or comments.

Table 3.7	
Q.13	Number
Yes	46
No	47
Blank	214
Total	307

- 49% of those who responded thought there was a need to review the speeds that agricultural motor vehicles other than tractors are subject to.
- 51% of those who responded did not think there was a need to review the speeds that agricultural motor vehicles other than tractors are subject to.

3.39 Of those that thought there was a need to review the speed limits for other agricultural vehicles:

- Half did not specify which vehicles or which speeds they would like to be reviewed

- 9 would like the speed of combine harvesters to be reviewed (proposed speeds ranged from 20-25mph)
- 5 would like the speed of self-propelling vehicles (such as, sprayers and telehandlers) to be reviewed (proposed speeds ranged from 20-25 mph)
- 4 would like the speed of all agricultural vehicles to be reviewed
- 4 said speed should be considered in relation to the width of the agricultural machine
- 4 said speeds should be reviewed and agricultural vehicles fitted with a tachograph
- 6 of the 9 respondents who proposed an alternative speed for other agricultural vehicles suggested 25 mph.