



**RESPONSE TO THE DEPARTMENT FOR TRANSPORT'S  
"EXAMINING THE SPEED LIMIT FOR HGVs OVER 7.5 TONNES  
ON SINGLE CARRIAGEWAY ROADS"**

**17 January 2013**

## Introduction

This is the response of the Royal Society for the Prevention of Accidents (RoSPA) to the Department for Transport’s consultation paper, “Examining the Speed Limit for HGVs Over 7.5 Tonnes on Single Carriageway Roads”. RoSPA thanks the Department for the opportunity to comment on the proposals. Our response has been produced following consultation with RoSPA’s National Road Safety Committee and its Road Safety Advisory Group. Some members of the National Road Safety Committee, including the Road Haulage Association, disagree with this response.

The speed limit on single carriageways for HGVs over 7.5 tonnes is 40 mph, and for HGVs between 3.5 tonnes and 7.5 tonnes, it is 50 mph. A number of organisations argue that the speed limit for the larger HGVs should be increased because this would reduce journey times, and hence costs, for the operators of these vehicles. They believe that the 40 mph speed limit causes unnecessary congestion, and increases crash risk because other drivers who are subject to a 50 mph or 60 mph speed limit on these roads, but are ‘stuck’ behind HGVs adhering to their 40 mph speed limit, become frustrated and make unsafe overtaking manoeuvres.

They also believe that increasing the speed limit for these larger HGVs would be fairer to those operators who obey the current speed limit and so are disadvantaged by the majority of operators whose vehicles exceed the current limit - around 70% of HGVs travel over 40 mph on non-built-up single carriageway roads.

However, it has not been possible to assess the road safety effects of increasing the speed limit for HGVs over 7.5t. There may be more serious collisions due to increased speeds but possibly fewer collisions caused by unsafe overtaking by drivers behind slow HGVs. Some freight might switch from rail and water to road if increasing the speed limit makes transporting freight by road more attractive than by rail or water. The effect on road maintenance caused by HGVs travelling at a higher speed is not known, but could impose additional costs on the Highways Agency and local authorities if it required more frequent maintenance.

The Government is seeking 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 the consultation paper

It is also seeking information on evidence about the possible road safety effects, as well as any impact on air quality, noise levels, modal shift in freight transport, road maintenance and costs to organisations that provide public information related to HGV speed limits.

## RoSPA Responses to Specific Question in the Consultation

### **Policy option 1: Raise the national speed limit for HGVs over 7.5t from 40 to 50 mph on single carriageway roads.**

The Department for Transport estimate that increasing the speed limit for HGVs over 7.5t from 40 mph to 50 mph on single carriageway roads would save between 2.1 million and 2.4 million driving hours per year, which represents around 0.02% of overall HGV driving hours. This would result in a net financial benefit of between £31.1 million and £36 million per year. The time savings do not include reduced driving time for other drivers stuck behind HGVs, who would also be able to speed up.

#### **Question 1**

Is this your preferred policy option?

#### **RoSPA Response**

RoSPA does not support policy option 1, to increase the national speed limit for HGVs over 7.5t from 40 to 50 mph on single carriageway roads.

RoSPA accepts that there would be financial benefits to the freight industry from an increased speed limit, and economic benefits to the country arising from reduced costs to the freight industry. However, we believe that it is likely that there would also be more, and more severe, road accidents and casualties. Quite apart from the human cost, this would mean increased financial costs, which could easily outweigh the financial benefits. In addition, there may be other significant costs due to increased road maintenance and the impact on air quality and noise levels.

HGVs over 7.5t are subject to a lower speed limit than other vehicles because they are much heavier, and take much longer to slow down and stop, especially when laden, than a car travelling at the same speed. When they are involved in a crash, this is also more likely to be severe. The Government has not been able to assess the effect on accident and casualty numbers or severity of increasing the speed limit for HGVs over 7.5t to 50 mph on single carriageway roads. The Impact Assessment accompanying the consultation paper notes:

*“However, despite commissioning research on the subject, it has not been possible at this stage to assess what road safety impacts may result if vehicle speed limits for HGVs >7.5t are increased, on single carriageway roads.”<sup>1</sup>*

TRL’s report stated that around 36 fatal accidents per year involve HGVs in the speed range 36 – 44 mph, which, it estimated, would be the maximum number of fatal accidents that would be affected by an increased speed limit. It also estimated that, if accidents involving large HGVs being overtaken could have been prevented by HGVs travelling faster, there would be five fewer fatalities a year. However, the report could not offer an opinion on whether the severity or frequency of these accidents would increase, nor whether fatalities due to dangerous overtaking would be reduced.

Therefore, RoSPA does not believe that there is sufficient evidence to justify increasing the speed limit for HGVs over 7.5t to 50 mph on single carriageway roads. More evidence is needed of both the benefits (eg, whether faster HGVs would mean fewer overtaking accidents) and costs of increasing the speed limit for HGVs over 7.5 tonnes.

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<sup>1</sup> Paragraph 76 of Impact Assessment DfT00151

**Policy option 2: Raise the national speed limit for HGVs over 7.5t from 40 to 45 mph on single carriageway roads.**

The Department for Transport estimate that increasing the speed limit for HGVs over 7.5t from 40 mph to 45 mph on single carriageway roads would save 1.1 million driving hours per year, which represents around 0.01% of overall HGV driving hours. This would result in a net financial benefit of £18 million per year. The time savings do not include reduced driving time for other drivers stuck behind HGVs, who would also be able to speed up.

**Question 2**

Is this your preferred policy option?

**RoSPA Response**

RoSPA does not support policy option 2, to increase the national speed limit for HGVs over 7.5t from 40 to 45 mph on single carriageway roads.

Our reasons are detailed in our response to question 1 above. In addition, the estimated financial benefits of this option are much lower than for option 1, which means it is more likely that the unquantified costs would outweigh any benefits.

RoSPA does not believe that there is sufficient evidence to justify increasing the speed limit for HGVs over 7.5t to 45 mph on single carriageway roads. More evidence is needed of both the benefits (eg, whether faster HGVs would mean fewer overtaking accidents) and costs of increasing the speed limit for HGVs over 7.5 tonnes.

**Question 3**

Do you consider there to be any additional policy options, or variants of policy options 1 and 2? 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.

**RoSPA Response**

RoSPA believes that that the national speed limit for HGVs over 7.5t on single carriageway roads should remain unchanged at 40 mph.

The major research study into the possible effects of increasing the speed limit for HGVs over 7.5t on single carriageway roads was not able to assess the road safety impacts of increasing the speed limit. Therefore, RoSPA does not believe that there is sufficient evidence to justify increasing the speed limit for HGVs over 7.5t on single carriageway roads.

## **Effects of the Current Limit**

### **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?

### **RoSPA Response**

RoSPA accepts that the current speed limit of 40 mph for HGVs over 7.5t creates costs for vehicle operators as it means longer journey times, and that these costs are ultimately borne by consumers in the prices we pay for goods and services. We also accept that there are many occasions when drivers of vehicles subject to higher speed limits on the same road, are stuck behind a slower moving HGV whose driver is adhering to the 40 mph limit. However, the research into the effects of increasing the speed limit for HGVs over 7.5 tonnes has not been able to show that the human and financial costs of doing so would not outweigh the financial benefits. Therefore, the costs of the current limit of 40 mph should not be described as “unnecessary”, but as the price of preventing increased road accidents and casualties.

## **Views from HGV Operators and Trade Associations**

### **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?

### **RoSPA Response**

RoSPA has no comment on this question.

## **Road Safety Effects**

### **Question 6**

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?

### **RoSPA Response**

RoSPA agrees that there are many occasions in which drivers of other vehicles, especially cars and vans, are stuck behind an HGV that is adhering to its 40 mph limit, when otherwise they could be making faster progress. RoSPA also agrees that this is often very frustrating for the drivers concerned, and sometimes probably results in some of those drivers making unsafe overtaking manoeuvres to pass the HGV.

However, it is far from certain that increasing the speed limit for HGVs over 7.5 tonnes would reduce the level of unsafe overtaking by other drivers, or whether it would reduce or increase the number or severity of accidents or casualties caused by unsafe overtaking.

TRL's report estimated that about five fatal accidents a year involve another vehicle overtaking an HGV over 7.5 tonnes, which would, therefore, be the maximum number of fatal accidents that could be prevented *if* increasing the speed limit would prevent such accidents. However, the report did not offer an opinion on whether increasing the speed limit would, in fact, reduce or increase such accidents:

*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.*

#### **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?

#### **RoSPA Response**

Increasing the speed of HGVs would mean that other drivers may need to increase their speed and would need more time and distance to overtake them. This could increase the risk of such overtaking manoeuvres causing crashes, and of those crashes being more severe.

TRL's report concluded that an increase of just 1mph in the speed of an HGV being overtaken would increase the distance required to complete overtaking by between 6 metres and 14 metres. It would increase the time required to complete overtaking by 0.06sec to 0.56sec.

### **Air Quality, Noise and Health Impacts**

#### **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.

#### **RoSPA Response**

RoSPA is not able to provide such information.

#### **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 standards
- c) Noise levels;
- d) Areas currently identified as noise hotspots

#### **RoSPA Response**

RoSPA is not able to provide such information.

**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 Noise and/or Air quality?

**RoSPA Response**

RoSPA is not able to provide such information.

**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?

**RoSPA Response**

RoSPA is not able to provide such information.

**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.

**RoSPA Response**

RoSPA thinks that there is insufficient evidence available for the Impact Assessment to properly take account of all the potential health and social costs of increasing the speed limit for HGVs over 7.5 tonnes on single carriageway roads.

**Other Impacts**

**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?

**RoSPA Response**

RoSPA believes that it is possible that increasing the speed limit for HGVs over 7.5t on single carriageway roads could result in more HGVs using those roads if their journey times are likely to be quicker. However, we are not able to provide any evidence that this would happen, or to estimate the size of this effect if it did occur.

**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?

**RoSPA Response**

RoSPA does not have sufficient evidence to assess whether an increased speed limit would encourage freight operators to switch from rail or water transport to road transport, but we think that if increasing the speed limit made transporting freight more cost-effective by road than by rail or water, then it is likely that some freight will switch from rail or water to road transport. If this occurred, then it is likely that it would result in a higher road accident and casualty risk.

**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?

**RoSPA Response**

RoSPA does not have sufficient evidence to assess whether an increased speed limit from 40 mph to 45 mph or 50 mph would result in the need for more road maintenance. However, if it resulted in more road freight being carried on the roads, this would create more wear and tear on those roads.

**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. 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?

**RoSPA Response**

RoSPA believes and hopes that Local Authorities would carefully assess the potential for increased road safety risks of a higher national speed limit for HGVs over 7.5 tonnes on single carriageway roads, and introduce appropriate local speed limits within the powers they have under “Setting Local Speed Limits, DfT Circular 1/06”.

**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.

**RoSPA Response**

RoSPA provides road safety advice and information, which includes road safety issues related to HGVs and speed limits. If speed limits for HGVs were changed RoSPA 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.

RoSPA thanks the Department for Transport for the opportunity to comment on the proposals. We have no objection to our response being reproduced or attributed.

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