RESPONSE TO THE DEPARTMENT FOR TRANSPORT’S CONSULTATION PAPER

“EXAMINING THE SPEED LIMIT FOR MILITARY ARMoured TRACK LAYING VEHICLES ON PUBLIC ROADS IN ENGLAND AND WALES”
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 Military Armoured Track Laying Vehicles on Public Roads in England and Wales’.

RoSPA thanks the Department for the opportunity to comment on the proposals.

Since 1977, tracked armoured vehicles (AVT) have operated on public roads in England and Wales under a mistaken understanding that they were exempt from the 20mph restriction for track laying vehicles (schedule 6 of the Road Traffic Regulation Act 1984 and previous legislation). This meant that they were allowed to travel to and from training areas, and during driver training, at speeds up to 40 mph if less than 40 tonnes and up to 30 mph for those over 40 tonnes, in accordance with Ministry of Defence (MoD) Armoured Vehicle Standing Orders.

However, this situation changed in October 2013 when investigations revealed that military AVTs were not exempt from the 20mph speed limit for track laying vehicles. In response to this the MOD imposed a 20mph restriction for military ATVs across the UK. The MOD have now requested that the speed limit for ATVs be increased back to 40 mph because the 20mph limit makes it difficult to provide realistic training for ATV crews and has created some road safety risks, as well as increased training and environmental costs.

The Department for Transport is, therefore, consulting on whether to increase the speed limit for military ATVs back to 40 mph, as per the situation prior to October 2013.

Q1. Please indicate which of the following categories best represents your interest in this consultation

☐ Local authority (please provide details)
☐ Road user - motorist
☐ Road user – Other) please provide details)
☐ Government enforcement body, police force and similar organisations (please provide details)
☐ MoD/Member of armed services
√ Road safety group (Safety Charity)
☐ Other (please provide details)

Q2. Do you live, or use public roads, in the vicinity of a key training area (as listed in paragraph 1.33 in the consultation document)?

Yes ☐
No √
Policy options

Q3. Please consider the following policy options

- Policy option 1: Do nothing; retain the existing 20mph limit for MoD armoured vehicles (tracked) (AVT), for example tanks and armoured personnel carriers, when travelling on public roads in England and Wales.
- Policy option 2: Increase the national speed limit for AVT in England and Wales to 40mph to reflect operating speeds before October 2013 (vehicles will continue to be limited by MoD Armoured vehicle standing orders).
- Other: Do you consider there to be any other policy options or variants on Option 1 or 2?

Please indicate your preferred option

☐ Policy Option 1 (Do nothing).
☑ Policy Option 2 (Raise speed limit to 40mph).
☐ Other.

RoSPA Response

Safety is a paramount consideration for RoSPA which overrides all other possible benefits resulting from an increase in the military AVT speed limit. However, RoSPA’s preferred option is 2.

In the thirty years between 1977 and 2013, when military ATVs travelled at up to 40 mph, no serious speed-related accidents involving these vehicles were recorded on roads in England and Wales. Based upon this previous experience, there is no reason to indicate that increasing the speed limit back to 40mph would adversely affect road safety.

Furthermore, driving at 20mph is below the optimum operating speed for AVTs, thus making the majority of them less manoeuvrable and responsive than at their higher design speed.

The MoD has a very stringent training regime in place, with drivers undertaking simulator training prior to driving on the roads. This together with practical training within military training areas prepares them for driving an AVT vehicle at speeds up to 40mph on the public highway. A driver is not considered for a test until they have driven a minimum of 90 miles both on and off road.

However, RoSPA notes that there is very little specific accident data about military ATVs, and so suggests that such data is recorded by the MOD and that the effect of increasing the speed limit is carefully monitored.

Q4. Do you think that AVT operational benefits will result from an increase in speed limit for AVT on public roads?

Yes ☑
No ☐
Don't know ☐

RoSPA Response

The current slower speed limit means that less training can be provided because there is an additional time cost based upon the driver requirements to drive a minimum of 90 miles
before taking their test. One MOD training centre, ARMCEN, has reported that the 20mph limit results in one less AVT driver test per day.

The MOD also estimate that enabling AVTs to operate at higher speeds will reduce vehicle fuel consumption, which it is estimated to have risen by between 5% and 7% since the 20mph restriction was introduced.

Running a vehicle at 20mph may lead to greater wear on engines and other components, according to the MoD, due to the gear ratios for some AVTs, which results in ‘hunting’ between the gears.

Q5. Do you think that an increase in speed limit on public roads is necessary to allow vehicle crews to be properly trained?

Yes √
No ☐
Don't know ☐

RoSPA Response
Yes, RoSPA believes that this is an important reason to increase the speed limit for military ATVs. Military personnel are required to operate these vehicles in difficult and hazardous conditions when they are on operations. If the crews are not able to be trained realistically before operational deployments, the risks to the crews and to other road users on deployment will be even greater.

Having a wider speed range, up to 40mph will help drivers to familiarise themselves at driving at speeds in excess of 20mph, which will be advantageous when deployed on operations where there will be an expectation to travel at this operational speed. Currently, it is more difficult to provide this training in England and Wales, making it difficult to prepare crews to operate competently and safely amongst civilian drivers worldwide.

Road congestion

Q6. Do you think that AVT movements restricted to the current 20mph limit contribute to congestion on public roads?

Yes √
No ☐

RoSPA Response
Slow moving AVTs, which are currently restricted to 20mph, may result in driver frustration, especially where there is a big speed differential and limited safe overtaking opportunities. This may encourage inappropriate overtaking as well as compound to general congestion.

Q7. Do you think that an increase in speed limit for AVTs will reduce congestion on public roads?

Yes √
No ☐
RoSPA Response
This is difficult to equate, but the higher speed limit may help to reduce vehicle tailbacks or inappropriate overtaking manoeuvres.

Q8. Between November 2013 and July 2014 the MoD record 36 near-misses in the locality of one key training area (ARMCEN, Bovington) by vehicles overtaking AVT travelling at 20mph. Do you think that an increase in speed limit for AVT will reduce the incidence of potentially dangerous overtaking manoeuvres?

   Yes √
   No ☐

RoSPA Response
Reducing speed differential will help, however, it is still important to plan appropriate routes to avoid high speed, busy roads if practically possible, thus minimising the incidence of inappropriate overtaking manoeuvres.

Q9. Do you think the current 20mph restriction for AVT presents a greater hazard to other road users than the proposed higher speed limit?

   Yes ☐
   No √

RoSPA Response
There is considerable evidence that higher speeds result in more crashes, and more severe crashes, and in particular, more serious injuries for pedestrians and cyclists. However, in practice, the majority of the AVT routes are outside areas of high concentration of vulnerable road users and the benefits outweigh the relatively small chance of collision with this road user group. Further, the MOD’s training should provide AVT drivers with the forward observational skills to avoid crash situations. In reality, due to the weight of these vehicles, injuries are likely to be fatal or serious irrespective as to whether the vehicle is travelling at 20mph or 40mph.

Q10. Do you think the Department for Transport’s view that an increase in speed limit for AVT to 40mph will not result in an increase in road wear and tear is correct?

   Yes ☐
   No ☐
   Don’t know √

RoSPA Response
DfT’s preliminary assessment is that there should be no appreciable increase in road wear and tear due to a speed limit increase from 20mph to 40 mph due to the manner in which the weight of the vehicle is distributed and the cleaner pick up and put down of track links compared to tread blocks on tyres. However, RoSPA has no evidence to suggest otherwise.
Q11. Do you think the current 20mph speed limit results in higher fuel consumption and emissions due to lower gear selections than would be the case for the proposed higher speed limit?

Yes  
No  
Don't know

RoSPA Response
Records from ARMCEN at Bovington, who monitor fuel consumption, estimate that due to the lower gearing and higher engine revolutions required to maintain a speed of 20mph, fuel consumption has increased by between 5% and 7% since 2013 when the speed restriction was introduced. RoSPA has no evidence to suggest otherwise.

Q12. Do you think the current 20mph speed limit results in greater vehicle component wear and tear due to lower gear selections than would be the case for the proposed higher speed limit?

Yes  
No  
Don't know

RoSPA Response
Driving at 20mph is shown to increase vibration levels and, due to engine hunting between gears, may lead to additional engine wear and tear, and again RoSPA has no evidence to suggest otherwise.

Q13. Do you think an increase in speed limit would provide significant time savings for AVT driver training and transit to and from training areas?

Yes  
No  
Don't know

RoSPA Response
ARMCEN reports that the reduction in the speed limit from 40mph to 20mph has resulted in one less AVT driver test per day. Prior to the speed reduction, the duration of a typical test was 45-50 minutes. Since the 20mph restriction, a test now takes up to 70 minutes. Based upon these figures an increase in vehicle speeds would provide some time saving, although this will vary according to training area and the number of miles driven to reach the test route.

Q14. Approximately 58,000 training miles are driven in and around ARMCEN (Bovington) per year. Do you have any data for annual road miles driven by AVT in the vicinity of other key training areas, miles driven in support of recruitment events or operations, or for total annual road mileage driven?

Yes  

No √
N/A

Q15. Do you have any experience of ill health effects after operating AVT at 20mph?

Yes ☐
No √
N/A

Q16. Do you think there are any other impacts of the proposed increase in speed limit for AVT not listed in this document?

Yes √
No ☐

RoSPA Response
If the speed limits for military ATVs are increased, there will be a need to publicise this locally in areas adjacent to the seven training areas as road users will have become familiar with the lower AVT speeds and may need to adjust their behaviour accordingly.

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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