



Department
for Transport

Examining the Speed Limit for HGVs over 7.5 tonnes on Dual Carriageway Roads: Consultation Response Template

July 2014

How to complete this questionnaire

Name: Brake, the road safety charity

Email: emorrow@brake.org.uk

Postal Address (Optional): PO Box 548, Huddersfield, HD1 2XZ

For each question below, please indicate your response by clicking on the appropriate 'check box'. If you make a mistake, click again to remove the cross (please do not click more than one box). Where applicable, please explain the reason(s) for your preference and provide evidence if available by clicking on 'Click here to enter text' under the appropriate question.

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

- Trade Association (please provide details)
- Haulage company
- HGV driver
- Government enforcement body, Police force and similar organisations (please provide details)
- Road safety group (please provide details)
- Local authority (please provide details)
- Road user
- Other (please provide details)

Brake is a national road safety charity that exists to stop the needless deaths and serious injuries that happen on roads every day, make streets and communities safer for everyone, and care for families bereaved and injured in road crashes. Brake promotes road safety awareness, safe and sustainable road use, and effective road safety policies. We do this through national campaigns, community education, services for road safety professionals and employers, and by coordinating the UK's flagship road safety event every November, Road Safety Week. Brake is a national, government-funded provider of support to families and individuals devastated by road death and serious injury, including through a helpline and support packs.

Brake was founded in the UK in 1995, and now has domestic operations in the UK and New Zealand, and works globally to promote action on road safety.

Road crashes are not accidents; they are devastating and preventable events, not chance mishaps. Calling them accidents undermines work to make roads safer, and can cause insult to families whose lives have been torn apart by needless casualties.

Policy options, costs and savings

Q2. Please consider the following policy options

- Policy option 1: Do nothing; retain the existing 50mph limit for HGVs over 7.5t on dual carriageways
- Policy option 2: Raise the national speed limit for HGVs over 7.5t from 50 to 60 mph on dual carriageway roads
- Policy option 3: Raise the national speed limit for HGVs over 7.5t from 50 to 55 mph on dual carriageway
- Other: Do you consider there to be any other policy options or variants on Option 2?

Please indicate your preferred option

- Policy Option 1 (Do nothing)
- Policy Option 2 (Raise speed limit to 60mph)
- Policy Option 3 (Raise speed limit to 55mph)
- Other

Please give your reason for choice of Option 1,2 or 3, or if you consider there to be other options, please explain fully and give any supporting evidence you may have.

Brake opposes proposals to increase HGV speed limits by any margin, on the basis that an increase in the speed limit is likely to mean an increase of some degree in the speeds at which HGVs travel. This would be detrimental to road safety and mean more devastating casualties. There is a wide range of evidence that managing and reducing traffic speeds is vital to improving road safety and reducing casualties, and that increases in speed result in increases in casualties [1].

Brake acknowledges that any increase in average speed would most likely be small. However, even small differences in speed are known to have a marked effect on crash rates. Typical stopping distance at 60mph is 20 metres greater than at 50mph, and for fully loaded HGVs the increase would be even greater, leaving drivers much less time to reach in an emergency [2]. Even a 1mph reduction in average speeds equates to a 5% crash reduction [3].

Furthermore, even if the increased limit did not make a difference to the speed of the 80% of HGV traffic that exceeds the present limit, it would likely encourage the 20% of traffic currently complying with the limit to increase speed. The assumption made by the government that HGV drivers would not choose to increase their speeds at all is therefore an illogical and dangerous one.

It is worth remembering that lower speed limits for HGVs exist for a reason, as these vehicles pose a particularly high risk. Due to their size and weight, the longer stopping distances experienced by vehicles at higher speeds are exacerbated, as are impact forces, risking greater numbers of more serious crashes. HGVs are involved in more than half (53%) of fatal crashes on motorways, despite only making up 10% of motorway traffic, and are involved in one in five fatal crashes on A-roads [4].

The government acknowledges that the proposal will have no economic or road safety benefit, stating that the intention of increasing the limit is to make it more 'credible' and 'legitimise' the existing behaviour of the majority of professional drivers. Brake is concerned that this has serious implications, which have not been properly considered, for the way in which traffic laws are made and enforced. It validates behaviour that is without doubt higher-risk, and is also a wholly inadequate justification for a move that risks increasing numbers of devastating deaths and injuries.

Non-compliance with a law does not mean that law is wrong – rather, it points to a failure of education and enforcement. To increase a speed limit, on the basis of the risky behaviour of the majority, and contrary to the evidence of what is safe, sets the dangerous precedent that if enough people flout a traffic law, it will be removed rather than enforced – potentially leading to an increase in risky driving behaviour of all kinds.

Rather than 'legitimising' risky speeding, Brake strongly recommends the government makes greater efforts to prevent it, reducing top and average speeds and thereby achieving a positive road safety benefit. If the government were to succeed in improving safety in this way, it would mean reduced human suffering, reduced costs to freight operators, and a wider economic benefit, resulting from fewer crashes and casualties. This could be achieved through prioritised traffic enforcement and higher fines, and in the case of HGV speed limits, greater efforts to promote road risk management within the sector.

Brake recommends the government step up its support and funding for work within the freight (and wider fleet) industry (such as that delivered by Brake's Fleet Safety Forum) to further develop and promote best practice in road risk management and improve speed limit compliance among at-work drivers. As is evidenced through Brake's fleet safety award scheme, effective and often straightforward fleet safety interventions and policies can help operators to significantly reduce costs as well as improving safety.

Interventions the government should be encouraging within the fleet industry include the use of speed limiters, and telematics to monitor driver behaviour. Brake is aware of numerous fleet operators voluntarily installing speed limiters on their vehicles, including limiting vans to 60mph, as well as a number of operators instructing their drivers to stick to 20mph in communities. The government should also be exploiting the potential of intelligent speed adaption (ISA) technology to prevent speeding both within the fleet industry and the wider driving population. To enable fleet operators to take advantage of ISA, it is necessary for the government to produce a national digital speed limit map – as a number of other European countries already have – and Brake urges the government to do so.

[1] Speed, Speed Limits and Accidents, Transport Research Laboratory, 1994

[2] E.g. The effects of drivers' speed on the frequency of road accidents, Transport Research Laboratory, 2011

[3] Typical stopping distances, Department for Transport, 2007

[4] HGV fatal accident rates, Metropolitan Transport Planning Unit, 2013

<http://www.bettertransport.org.uk/media/21-10-2013-lorry-fatalities-research>

Q3. Do you think the balance of savings and costs of changing the speed limit detailed in the Impact Assessment reflect your own experience or expectations?

Yes
No

If 'No' please explain your reasons

The government has stated that it expects no costs from the change in speed limit, and some savings resulting from no longer having to prosecute drivers who would no longer be breaking the limit. However, as acknowledged above, this is based on the unproven assumption that there would be no increase in average speeds and no increase in casualties. If this assumption were to turn out to be false, then the cost would be unacceptable. Aside from the horrendous human suffering that results from road deaths and injuries – which Brake bears witness to through our support work, every day – every extra road death would cost the country £1.7 million [5]. If there are more crashes involving HGVs, then this will also mean increased costs to the operators in the form of insurance premiums and more staff and vehicle downtime.

If speeds increase, there is also likely to be an increase in fuel consumption and greenhouse gas emissions. HGVs travelling at 56mph typically achieve only 7.4 miles per gallon, compared with 9.5 at 50mph [6]. The increase in emissions could be exacerbated if increased speed limits both on single- and dual-carriageway roads encourage a modal shift towards road freight and away from greener transport options such as rail. Road freight already accounts for 92% of UK greenhouse gas emissions from freight, while transporting only 66% of the freight moved in the UK by weight [7].

In terms of costs to wider society, it is concerning that the government has not considered the potential negative impact on compliance with other speed limits and traffic laws of setting such a precedent, as explained above.

[5] Reported road casualties Great Britain 2012, Department for Transport, 2013

[6] BTAC/IRTE technical trials of June 2000

[7] UK transport greenhouse gas emissions factsheet, Department for Transport, 2011

Q4. Are there any negative impacts of the current speed limit other than those referred to in the Impact Assessment?

Yes
No

Please explain your answer and provide any evidence you may have.

Brake rejects the presumption that there are negative impacts of the current speed limit. Vital safety laws are not unnecessary regulation – they protect lives, prevent terrible suffering, and save both businesses and the wider economy the significant cost of crashes. The only stated 'negative' impact in the proposal is

that the current limit criminalises professional drivers for behaviour that is widespread. However, prosecuting drivers who take risks and break the law, such as by speeding, is not a negative impact – it is a vital aspect of keeping us all safe on the roads.

Q5. Do you think that HGVs would be unlikely to increase their speed on dual carriageways as a result of this proposal?

- Yes
No

Please give your reasons

As outlined above, there is a distinct likelihood of at least a small increase in average speed, especially given the 20% of HGC traffic complying with the current limit. Speed limits send a clear message that it is safe to drive at up to the speed indicated. It therefore seems likely that, if the limit were to be raised, the law-abiding 20% may increase their speed in line with the other 80%.

Evidence is clear that even small increases in speeds result in significant increases in risk and therefore in crashes and casualties, as outlined above, which is cause for grave concern. Brake stresses that the government should not risk raising the number of devastating deaths and injuries on our roads in order to legalise the behaviour of drivers who are breaking the law and posing a risk.

Q6. Do you think an increased speed limit to 60mph on dual carriageway roads will lead to more HGVs over 7.5t using dual carriageway roads than do currently?

- Yes
No

Please give your reasons

HGVs frequently follow routes theoretically calculated to be the fastest, drawing on speed limit data in satellite navigation systems and route planning software. If the HGV speed limit on dual carriageways is raised to be the same as that on motorways, it is reasonable to suggest that dual carriageway routes may be chosen as an alternative to motorways more frequently than they are at present, and HGV traffic on these dual carriageways increase.

Are there any other impacts?

Q7. 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 01/2013.¹ Do you think that the increase in the

national speed limit for HGVs over 7.5t on dual carriageways would make it more likely that local authorities would introduce more local speed restrictions?

Yes
No

If 'yes' please give details of which roads

Local government is being encouraged to respond to local community concerns over speed [8], and an increase in fast-moving HGVs on dual carriageways near towns and villages may lead to an increase in requests for lower speed limits and other safety measures to protect local people and address concerns about noise pollution and air quality. Many communities wishing to campaign for safer roads, report traffic speed as a key concern, and many also flag up HGV traffic as a specific issue. It seems likely that more communities will raise these concerns and call on their local authorities to address them, work which Brake will continue to support.

[8] SETTING LOCAL SPEED LIMITS, Department for Transport Circular 01/2013

Q8. If you are an organisation providing information to the haulage industry or other road users, do you think your organisation would incur publicity or conversion costs in addition to those related to the speed limit change on single carriageways as a result of the proposed speed limit increase on dual carriageways?

Yes
No

If 'yes' please indicate what these may be.

Brake is a national, government-funded provider of support to families and individuals devastated by road death and serious injury, including through a helpline and support packs. If casualties increase as a result of the HGV speed limit increase, this will result in increased demand for Brake's support services and increased cost in order to provide them.

Brake also proactively engages with companies that operate HGVs in order to minimise road risk through its Fleet Safety Forum, a service that presently receives a small annual grant from the DfT. By increasing the HGV speed limit on the basis that many drivers do not comply with it, government will be sending a message to fleet operators that speeding is acceptable and the government is happy to legitimise dangerous behaviour. This will mean Brake might have to work much harder to engage fleet operators on the topic of speed, and to help them persuade their drivers of its importance.

Similarly, in a broader social context, if the government keeps conveying a message that speeding is acceptable and will be legitimised, Brake will have to work harder to raise public awareness of the dangers of speeding and excessive speed.