

Response ID ANON-KMPX-Z95F-E

Submitted on 2012-12-19 13:20:23.608394

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4 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.

q1:

No, because the current speed limit is widely ignored and not enforced. We feel that increasing the limit to 50 mph will encourage even higher average speed.

5 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.

q2:

We could accept this marginal increase as this is more reflective of what actually happens. It should be accompanied by stricter enforcement by the police and other traffic authorities.

6 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

q3:

The increase should not supercede local lower speeds, which may be there for safety and other reasons.

7 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.

q4:

Cannot accept that the current 40 mph plays a major part in congestion - this is simply due to too many vehicles on the roads and should be addressed in other ways.

8 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?

q5:

Not applicable.

9 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.

q6:

We question whether the evidence supports the idea that fewer collisions would occur because, equally, the number may increase due to higher speeds involved and time to overtake. Anyway, as stated in the background information, the majority of HGVs do not adhere to the limit anyway.

10 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 here.

q6a:

We suspect the severity would increase due to increased speed at impact, combined with the fact that HGVs may well be tempted to break a new 50 mph limit.

11 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?

q7:

Cars tend to travel at the limit of 60 mph or greater, hence the need for speed cameras for enforcement. A better solution to increasing the speed limit for HGVs would be the construction of passing sections at regular intervals.

12 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.

q8:

Air quality problems are one issue but greenhouse gas emissions are equally important and increasing speed is likely to lead to an increase of emissions.

13 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 (AQMA). Local authorities may have specific evidence on the effect on AQMA in their authority; b) EU air quality standards [1] ; c) Noise levels; d) Areas currently identified as noise hotspots [2]

q9:

Increased speed invariably leads to increased fuel consumption and hence adverse impacts on all of the issues listed above, including noise.

14 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

q11:

Unlikely that there would be a significant improvement in noise and air quality because the vehicle numbers will not reduce to any extent. Noise and air quality is influenced by the way in which the vehicle is driven and this is difficult to quantify.

15 Do you think either of the policy options goes against the underlying principles of the EU Environmental Noise Directive [3] or of the Noise Policy Statement for England?[4]

q15:

Yes. The intention of both the EU Directive and the NPSE is that they should apply to all types of noise including "environmental noise" which includes noise from transportation sources. Increasing speed limits is unlikely to be within the spirit of the legislation although impact will clearly depend on local circumstances.

16 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.

q12:

No views.

17 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?

q13:

Yes. This could be an unintended consequence although it is unlikely such vehicles would transfer from larger, wider and faster roads, if available.

18 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?

q14:

Yes, this is a major concern. Congestion in UK roads is already worse than in most developed EU member countries. The UK Government should be directing freight from road to rail rather than introducing measures at the behest of the roads lobby that will make sustainable freight transport options less competitive.

19 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.

q15:

Yes, as it is known that road damage costs are a product of axle weight and vehicle speed. The damage done to road surfaces from HGVs is known to be one of the major factors leading to the poor state of urban and rural roads and bridges. The introduction of distance-based charges for HGVs would help to correct this situation, as has been done in many EU Member States.

20 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.[5] 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?

q16:

Quite likely, because in many cases these have been introduced for safety or environmental reasons.

21 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.

q17:

Not applicable to our organisation but we would make the comment that these should not be issues of prime concern when considering such a change.