



Department
for Transport

Consultation Response Report

Examining the Speed Limit for HGVs over 7.5 tonnes on
Dual Carriageway Roads: Summary of Responses and
Government Response

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Foreword

I am very pleased with the high level of interest shown in this consultation and would like to thank all those who responded for their valuable input. I have noted the views expressed, both by people concerned about the proposals and supporters.

After careful consideration I have decided to proceed with plans to increase the national speed limit for heavy goods vehicles of more than 7.5 tonnes on dual carriageway roads from 50 mph to 60 mph.

This complements the decision that the government has already announced to raise the national speed limit for HGVs over 7.5 tonnes on single carriageway roads, and is part of a wider package of associated measures that the government is bringing forward to continue to increase economic efficiency and remove outdated restrictions.

The national speed limit increase on dual carriageways will modernise an outdated regulation dating from the 1980s, better reflecting the capabilities of modern HGVs. It will help to free professional hauliers from unnecessary regulation.

The change will ensure that HGV speed limits are proportionate and better aligned with the limits for HGVs on motorways and single carriageways, and with other vehicles such as coaches and cars towing caravans. Our evidence indicates that actual average speeds are unlikely to change in response to the change in national speed limit. Our impact assessment, which has been scrutinised by independent experts, concludes that there is not expected to be an adverse effect on road safety, but we will be monitoring the impacts closely.

I expect the new speed limit to come into effect on 6 April 2015. The existing limits continue to apply until the change has been put into effect. The amended speed limit will cover dual carriageway roads in England and Wales, unless specific lower local or urban speed limits are in effect.

Claire Perry MP, Parliamentary Under-Secretary of State for Transport

Part 1 - Introduction

1. The maximum speed limit for Heavy Goods Vehicles (HGVs) over 7.5 tonnes(t) on dual carriageway roads is currently 50 mph, as prescribed in Schedule 6 of the Road Traffic Regulation Act 1984, which applies to Great Britain. Vehicle specific speed limits are devolved in Northern Ireland and in Scotland allowing the limits there to be different from the rest of Great Britain. This consultation therefore only considered the speed limit in England and Wales.
2. This consultation examined the case for increasing that 50 mph limit to 60 mph. Alongside this consultation, the government announced a change in the national speed limit for these vehicles on single carriageway roads from 40 mph to 50 mph. Neither of these limits apply where there are lower local speed limits or the standard urban 30 mph limit.
3. Dual carriageway roads cover a range of standards of roads ranging from those built to similar standards as motorways (for example the A3 between London and Portsmouth and part of the A14 between the A1 and the M1/M6) to lower standard routes with local 50 mph maximum speed limits applying to all vehicles using them. Dual carriageways in urban areas are usually covered by 40 mph or 50 mph local speed limits or the default 30 mph speed limit for lit roads in built-up areas.
4. On dual carriageways the actual average speed at which HGVs, such as articulated lorries, travel in free flow conditions (when they are not held up by other traffic or obstructions such as junctions, hills or bends) is 53 mph¹. More than 80% of HGVs to which the 50 mph applies currently exceed it in free-flow conditions².
5. The average speed observed on motorways for these HGVs in free flow conditions is also 53 mph, even though the legal speed limit for larger HGVs on motorways is 60 mph. Free flow traffic data shows that 99% of articulated lorries travel within 60mph. A major reason for this is that their speeds are limited by a speed limiter to 56 mph (90km/h) as required by EU legislation.
6. A 60 mph HGV speed limit on all purpose dual carriageways will therefore (like the HGV motorway speed limit and indeed some coach speed limits) be slightly higher than the standard 56 mph speed limiter

¹ This is based on 2013 observed speed data. It excludes observations for 2-axle rigid HGVs, around two thirds of which weigh less than 7.5t.

² See: <http://www.dft.gov.uk/statistics/tables/spe0101>

setting. For this reason we also included Option 3, to change the 50 mph HGV limit on all purpose dual carriageways to 55 mph, very close to the speed limiter threshold. This would however create yet another different speed limit.

7. It is implausible that lorries will travel faster on all purpose dual carriageways than on motorways in free flow conditions, because motorways have fewer obstacles and are built to higher standards. So the forecast effect is that there will be minimal change on the ground as the dual carriageway speed limit is increased to match the motorway limit at 60mph.
8. Because we do not predict a change in free-flow speeds as a result of the change in maximum speed limits, we do not predict any monetised costs or benefits, changes to greenhouse gases, other environmental impacts or in the amount of road freight. However, changing the speed limits is a deregulatory move and will make the speed limit more credible, legitimising the behaviour of professional drivers. We also expect a very substantial increase in compliance, which will generate some small beneficial side-effects in the form of fewer proceedings being required to deal with offenders.
9. A consultation-stage impact assessment (IA) was published with the consultation document. Responses received from this consultation have informed the final stage IA published with this document. In particular, we have conducted a sensitivity test to consider the effects on road safety and on business if HGVs were to increase their speed by 1mph, though we continue to think this unlikely.
10. The systematic and rigorous enforcement of the current 50 mph speed limit is difficult and establishing a credible deterrent to improve compliance with the 50 mph limit would not be a reasonable call on finite police resources. Enforcement is more difficult to automate using cameras than road speed limits. If a lot more enforcement did occur it would involve the disproportionate targeting and punishment of these drivers.
11. Some parts of the package of measures planned to accompany the change in the single carriageway limit for HGVs of more than 7.5t from 40 mph to 50 mph are also relevant to dual carriageways. In particular a more rigorous and systematic approach to driver conduct proceedings would be applied to offenders breaking a revised 60 mph limit. However, in practice this would be likely to involve very few cases, as there is a 99% compliance rate with the equivalent 60 mph lorry speed limits on motorways.
12. Following the announcement to increase the maximum speed limit for these vehicles on single carriageway roads, the Department has written to Local Authorities in England and Wales to encourage the use of local lower speed limits for sections of roads where there are particular safety concerns for reasons such as short sight lines, road condition, high numbers of cyclists/pedestrians, or where there is a possible risk of air

quality limits being exceeded. Lower limits can be applied equally to sections of dual carriageways where there are similar concerns.

13. In the consultation we sought views on:
 - a. Doing nothing – retain the existing 50mph limit for HGVs over 7.5t on dual carriageways.
 - b. Increasing the speed limit for HGVs over 7.5t to 60 mph.
 - c. Whether 55 mph would be a reasonable alternative.
 - d. Any further options not identified in the consultation document.

14. We also asked for more information on:
 - a. Local authorities reducing speed limits on non-trunk primary routes.
 - b. Printed public information.

15. The consultation document was published on the Department for Transport's (DfT) website. Respondents were invited to participate in the consultation by completing an online questionnaire or by email using the response template provided. The consultation ran for 6 weeks, and closed on 5 September 2014.

16. The consultation covered England and Wales only, as vehicle specific speed limits are devolved to Scotland and Northern Ireland.

Table of Questions

No.	Question
1	<p>Please indicate which of the following categories best represents your interest in this consultation:</p> <ul style="list-style-type: none"> ● 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)

2	<p>Please consider the following policy options:</p> <ul style="list-style-type: none"> • Policy option 1: Do nothing; retain the existing 50mph limit for HGVs over 7.5t on dual carriageway roads. • 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 roads. • Other: Do you consider there to be any other policy options or variants on Options 2 or 3? <p>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.</p>
3	<p>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? If 'No' please explain your reasons.</p>
4	<p>Are there any negative impacts of the current speed limit other than those referred to in the Impact Assessment? Please explain your answer and provide any evidence you may have.</p>
5	<p>Do you think that HGVs would be unlikely to increase their speed on dual carriageways as a result of this proposal? Please give your reasons.</p>
6	<p>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? Please give your reasons.</p>
7	<p>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. 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? If 'yes' please give details of which roads.</p>
8	<p>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? If 'yes' please indicate what these may be.</p>

Part 2 - Executive Summary

17. The Department received 532 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.
18. There was a total of 478 online response records. However, of these 74 gave no answers to any of the consultation questions. These have therefore been removed from the total number of responses for the purpose of this analysis, leaving 404 online responses.
19. 126 responded by email. Of these 8 supported an increase in maximum speed limit on dual carriageways for HGVs over 7.5t, but did not answer any of the consultation questions or indicate whether the increase should be to 60mph, 55mph or other specific limit. These have also been removed from the total for the analysis, leaving 118 email responses.
20. Therefore the total number of responses for the purpose of this summary is 524, broken down as:
- Online questionnaire 404 responses
 - Email 118 responses
 - Hard copy by post 2 responses
21. Of the 524 responding, 17 did not indicate a sector that best represented their interest. From those that did the respondents were broadly categorised into 9 main groups:

Group	No.
Trade Association or other representative organisation	16
Haulage Company	137
HGV Driver	126
Government Enforcement body, police force and similar organisations	6
Road Safety Group	16
Local Authority	13
Road User	146
Driving instructor or training provider	25
Other	22
Total	507

- 22.** Three respondents did not answer question 2. Of the 521 respondents indicating an option under this question, 352 (68%) supported Option 2 - to raise the national speed limit for HGVs over 7.5t from 50mph to 60 mph on dual carriageways. The main reasons given for supporting this option were potential improvements in traffic flow, congestion and road safety as a result of a reduced speed differential between HGVs and other traffic³, that the existing limit does not reflect modern vehicles' technical capabilities and that they can safely travel faster, and that the proposal reflects the current reality of HGV use on our roads.
- 23.** 75 (14%) respondents did not support an increase in speed limits, citing road safety concerns, the view that speed limits should be better enforced, and environmental concerns.
- 24.** Only 51 (10%) respondents supported a speed limit increase to 55mph. The main reason given for supporting this option was that as HGVs are limited to a maximum of 56mph under European legislation⁴ there was little point in increasing the speed limit to 60mph.
- 25.** Suggestions under 'other options' included:
- Do not change the speed limit, enforce it more effectively.
 - Raise the speed limit for HGVs to 70mph.
 - Reduce speed differentials by lowering the speed limit for other road users to match that of HGVs.
 - Raise the speed limit to 56mph to match the maximum speed limiter setting.
 - Raise the speed limit to 60mph on 'motorway standard' dual carriageways only.
- 26.** 82% of respondents to question 3 agreed with the balance of savings and costs of changing the speed limit detailed in the impact assessment.
- 27.** 69% of respondents to question 4 thought there were no negative impacts of the current speed limit to be added to the impact assessment.
- 28.** The majority of respondents to question 5 (63%) thought that HGVs would increase their speed as a result of a speed limit increase to 60 mph. This was largely due to a belief that HGV drivers would naturally drive as fast as permitted to shorten journey times. This is not borne out by the average HGV free flow speed of 53 mph on motorways where the speed limit for these vehicles is already 60mph. Some respondents seemed unaware that these vehicles are fitted with speed limiters calibrated to a maximum speed of 56mph as they thought that, as HGVs were already exceeding the current limit, they would exceed any new higher limit also.

³ The Department does not consider these effects likely, and have set out our reasons in the Government response to this question, below.

⁴ 2002 EU amendment (2002/85/EC) extended 56mph speed limiter requirement to all goods vehicles over 3.5 tonnes

29. The majority of respondents to question 6 (76%) thought that increasing the speed limit to 60mph would not result in more HGVs using dual carriageway roads. The main reason given was that HGVs will already be using the fastest, most direct routes.
30. Most respondents to question 7 (59%) thought it unlikely that local authorities would introduce lower local speed limits for all vehicles on sections of dual carriageway roads as a result of an increase in speed limit. 7 of the 9 local authorities responding to this question thought it unlikely they would introduce lower local speed limits as a result of a higher speed limit for HGVs.
31. Only 10 respondents to question 8 thought they 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, with only 4 providing details. Likely costs anticipated were for changes to websites and printed information.

Next Steps

32. The Government has carefully considered the responses and intends to increase the maximum speed limit from 50mph to 60mph for HGVs over 7.5 tonnes on dual carriageway roads. We will now make the necessary regulatory changes to enable the new speed limit to come into force before April 2015.

Part 3 - Detailed Summary of Responses

33. Question 2 Please consider the following policy options:

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

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.

34. 521 respondents answered this question.

Option	No.
Option 1 - Do nothing	75
Option 2 - Raise to 60mph	352
Option 3 - Raise to 55mph	51
Other	43
Total	521

Option 1

35. Of the 75 (14%) who were supportive of maintaining the status quo, 38 described themselves as road users, 11 as HGV drivers, 7 as driving instructors/training providers, 3 as haulage companies, 3 as road safety organisations, 3 as local authorities, 1 as a government enforcement body, police force or similar organisation (ex roads policing officer), 1 as a trade association/representative organisation, and 3 as 'other'. 5 respondents didn't give a category.

- 36.** The main reasons⁵ given for not supporting a speed limit increase for HGVs were:
- 26 respondents thought that higher speeds would have an adverse effect on road safety with an increased frequency and severity of accidents.
 - 17 thought current limits should be enforced rather than raised to legitimise current practice.
 - 13 thought that higher speeds would cause damage to the environment through higher fuel consumption and emissions.
 - 8 thought that drivers were already driving too fast for the current limit and would likely exceed a higher limit too.

Some other reasons mentioned included the view that higher speeds would lead to more road wear and tear, and make dual carriageways more dangerous for cyclists.

- 37.** Some respondents who were concerned about a negative impact on road safety as a result of increasing the speed limit cited increased stopping distances. One instructor said:

"There is no need to raise the speed limit, although technology has improved [...] Higher speeds for lgv [HGVs] will result in more death[s] on the roads due to drivers being unaware of stopping distances with a fully laden truck."

And a HGV driver said:

"As a driver of a supermarket hgv there is no gain going faster in a hgv...I travel at 51 on the motorway...people fly past me at 56mph...as a consequence I get my gap between me and the lorry in front back quicker allowing me to drive safety. ..& by the time I come off the motorway the wagon that flew past me is waiting at the traffic lights. .. if you had a 60 limit all they would do is drive at the maximum speed causing more deaths by bringing more cars into the mix....I think the greater stopping distances have not been assessed properly as a forty tonne lorry that comes off the road is going to take a lot of stopping."

- 38.** Some respondents cited the impact on vulnerable road users. One respondent said:

"I am a cyclist and without segregation on roads, I worry increasing the speed limit makes cycling more dangerous. Not just the fact that HGVs would pass other road users quicker but reaction times and stopping distances would be hampered."

- 39.** Of those raising environmental concerns as a result of a speed increase, one respondent describing themselves as a driver and cyclist said:

⁵ Please note that where numbers of respondents are given against reasons, a respondent may have made several comments and may therefore be included in the totals for one or more other reasons.

"..... Fuel consumption would increase and emissions of various greenhouse gases at a time when these should be reduced not just for the good of the planet but also to meet EU reduced emission targets."

40. Of those who thought that HGV drivers would not comply with the increased speed limit, one road user said:

"Increasing the speed limits will encourage speeding. It is well documented that drivers generally observe speeds above statutory speed limits therefore by raising to 50 you risk 60 and by raising to 60 you risk 70. This is far too fast for a heavy vehicle attempting an emergency stop...."

Option 2

41. Of the 352 (68%) who supported raising the speed limit for these vehicles on dual carriageways to 60mph, 104 described themselves as haulage companies, 94 as HGV drivers, 81 as road users, 14 as trade associations/representative organisations, 13 as driving instructors/training providers, 11 as road safety groups, 10 as local authorities, 5 as government enforcement bodies, police force or similar organisations, 1 as a motoring organisation, 11 as 'other', and 8 respondents didn't give a category.

42. The main reasons given for supporting this option were:

- 85 respondents thought this would reduce the speed difference between groups of traffic and would promote benefits such as better traffic flow and reduced congestion, and would limit dangerous tailgating and overtaking and braking manoeuvres from impatient car drivers.
- 65 thought that as modern HGVs are technically more advanced (e.g. better braking, steering and visibility) than at the time when the limit was set they can now safely travel at higher speeds.
- 40 respondents thought the proposal reflected the current reality of HGV use on our roads, and as such is unlikely to lead to an increase in accidents. 6 of these also thought the increase would de-criminalise the vast majority of professional drivers.
- 24 noted that even if the speed limit is raised to 60mph, HGVs will still be restricted by speed limiters to 56mph. By increasing to 60mph, they felt this small increase would have plenty of benefits with few drawbacks, as lorries are already close to travelling at 56mph.
- 12 mentioned that raising the limit to 60mph will bring HGVs in line with coaches/buses. It is already considered safe for a coach/ bus to travel at 60mph on this type of road and these vehicles share similar equipment to HGVs.
- 11 thought that higher speeds would lead to shorter journey times therefore make the industry more efficient and boost the economy.

Others commented that the effect of any increase in speed limit should be carefully monitored to inform any meaningful reviews at a later date, and that an increase to 60mph will bring about consistency with motorway speed limits, particularly given the evidence presented relating to existing free flow speeds on motorways.

43. Among those who thought the current speed limit is outdated and does not reflect the capabilities of modern HGVs, a road user said:

"These speed limits were set at a time when the braking systems and tyres on lorries were far less effective than they are today and, as such, are outmoded and pointless...."

44. Of those thinking the increase will lead to less congestion, better traffic flow and less overtaking, an approved driving instructor said:

"It makes sense to align the speed limits for these large vehicles with other vehicle categories so as to help maintain traffic flow and avoid possibly dangerous overtaking."

An organisation representing motorcyclists commented:

"... A reduction in the number of protracted overtaking manoeuvres will [...] increase the capacity of many of our improved A roads, through greater stability of traffic flow."

45. From those who said the higher limit will legitimise current HGV speeds on dual carriageways, a road user said:

"Most drivers of lorries drive to the tacho max anyway so this will just end the criminalisation of normal behaviour."

46. Some other comments from those supporting this option included:

"Speed limiters already restrict the vehicles to a maximum of 56mph, but the 60mph limit gives a bit of an allowance for over[r]un when going downhill. This would mean that drivers could restrict their speed on downhill sections by using the exhaust brake, rather than using the service brake. This is better for the environment and driver stress levels."

And

"As an HGV driver with just short of twenty seven years' experience primarily on articulated vehicles I have to concede that raising the dual carriageway speed limit to 60mph will be the most sensible option possible. My reasoning on this can be summed up in three main points as follows:-

1. First and foremost hgvs are already limited to an across the board average of 53-56 mph hence the limit could safely be applied without being flouted.

2. To set the limit at 55 mph would be unenforceable and from a drivers point of view would be detrimental to road safety as continually checking speed rather than letting the factory set limiter do its job at 56 mph and letting the driver concentrate on the road and any potential hazards ahead would be a ridiculous distraction and annoyance over the sake of 1-2 mph difference.

3. As already pointed out by yourselves and as most police forces across the country know, the majority of hgv drivers have been running at 56 mph on dual carriageways for as long as I can remember without any evidence of raised accident frequencies."

A representative organisation commented:

"Rural dual carriageways and motorways have the lowest accident stats. Also with the introduction of concrete safety barriers, the risk of lane crossover accidents involving HGVs has been virtually eliminated."

47. The Association of Chief Police Officers also supported this option commenting:

"The proposalmay actually enhance safety and reduce risk due to the existing infrastructure (on 60 and 70mph carriageways) and the existing flow rates of traffic."

Option 3

48. Of the 51(10%) respondents supporting Option 3 - to increase the speed limit to 55mph - 21 described themselves as haulage companies, 14 as HGV drivers, 11 as road users, 2 as driving instructors/training providers and 3 as 'other'.

49. The main reason given for supporting an increase to 55mph was that most HGVs are limited by regulation to 56 mph so respondents felt there was little point in increasing the limit to 60mph.

A haulage company commented:

"The proposed increase to 60mph would serve no purpose for the vast majority of HGVs given that speed limiters at 56mph are already in place, whereas a 55mph limit would allow these vehicles to operate in the main to the value set by their speed limiters, thus reducing wear and tear, improving fuel efficiencies etc."

A further eight respondents thought that as some companies have decided to limit the speed of their vehicles (e.g. Tesco and Sainsbury's,) to give maximum fuel economy, a limit of 60mph would not make a lot of difference if vehicles are already voluntarily restricted to a lower speed.

Other Options

- 50.** Of the 43(8%) respondents suggesting other options, 16 described themselves as road users, 9 as haulage companies, 7 as HGV drivers, 2 as road safety groups, 1 as a driving instructor/training provider, 1 as a trade association, 3 as 'other' and 4 didn't give a category.
- 51.** Some common suggestions received included:
- 4 respondents who thought the speed limit should remain as it is, and the policy should be to enforce current speed limits.
 - 4 who thought the speed limit for HGVs should be raised to 70mph, the same as cars.
 - 4 who thought the speed limit should be the same as the speed limiter maximum i.e. 56mph.
 - 3 who said to raise the limit to 60 mph, but also raise the speed limiter setting of 56 mph.
 - 3 who thought that to reduce the speed differential between HGVs and other road users, it would be better to lower the speed limits for other road users to match that for HGVs.
 - 3 respondents who said that some dual carriageways are not suitable for higher speeds and suggested only raising the limit on "motorway-standard" dual carriageways.
- 52.** For safety reasons, one respondent thought the speed limit should be raised only on roads where there is a fully segregated cycle path.
- 53.** One response (from a member of the Chartered Institute of Highways and Transportation) thought that the introduction of any increased speed limit should be accompanied by other measures:

"This should not be an isolated measure. The 80km/h HGV speed limit in the Netherlands is accompanied by design and policy that ensures their road network is safe and attractive for all users. In particular, people cycling and walking will never share space with lorries (or motor traffic in general) travelling at this speed - they have high-quality separate provision. Bringing the HGV speed limit into line with the Netherlands must be accompanied by the development and implementation of Dutch Sustainable Safety principles in Britain, with benefits for all road users."

Government response

- 54.** Nearly 8 out of 10 respondents to the consultation supported an increase in the national speed limit for HGVs over 7.5t on dual carriageway roads. The Government therefore intends to raise the speed limit. We discounted the option of raising the speed limit to 55 mph because it received little support in comparison to raising the speed limit to 60 mph, and because we consider a 60 mph limit doesn't cause difficulties on motorways, despite being higher than the 56 mph speed limiter setting.

55. Road safety concerns were the main reason 14% of respondents opposed change. The Department does not consider that road safety is likely to be negatively affected by changing the HGV speed limit on dual carriageways, because we do not expect that actual HGV speeds will change as a result of the proposals. Despite a 60 mph speed limit on motorways, HGVs drive at the same average free-flow speed on both motorways and dual carriageways. It is implausible that HGVs would drive faster on dual carriageways than on motorways.
56. In response to concerns we have however conducted a sensitivity test to determine possible effects on road safety and journey time savings if average HGV speeds were to increase by 1 mph. This has indicated a risk of a small increase in fatal accidents as a result of the change, of about 0.18 additional fatal accidents per year. There is also some research suggesting this would not materialise if actual HGV speeds did increase. It is important to stress that the Department does not consider this a likely outcome of the speed limit increase, and that the UK's roads are among the safest in the world. The Department is taking forward a number of other initiatives to improve road safety, including measures to tackle drug driving, and consultations forthcoming on the scope of exemptions from some safety requirements for HGVs. Where there are particular safety or environmental concerns, local authorities are able to lower the speed limit for all traffic on local roads. The Department has issued advice to local authorities recently on how to do this⁶.
57. Given HGVs over 7.5t have speed limiters fitted which limit their powered speed to 56 mph, we consider it highly unlikely that they would routinely exceed the 60 mph limit as some consultees have suggested.
58. The Department does not consider that dangerous overtaking is likely to be a significant consequence of the current dual carriageway limit, because the barrier between the two carriageways prevents head-on collisions being a consequence of overtaking manoeuvres.
59. Having considered the evidence available and the responses to this consultation, the Department is proceeding with changing the speed limit for HGVs > 7.5 tonnes on dual carriageway roads in England and Wales to 60 mph. This limit best reflects the reality of use of dual carriageway roads by professional HGV drivers, and will be part of a modern, credible set of speed limits for HGVs over 7.5t on our roads.

Question 3: 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?

60. 468 responded to this question with the majority (82%) in agreement with the balance of savings and costs of changing the speed limit detailed in the impact assessment.

⁶ SETTING LOCAL SPEED LIMITS, Department for Transport Circular 01/2013

61. Of those who agreed with the balance of savings and costs, a county council commented:

"Given the evidence presented and our own analysis, we do not believe there are road safety implications from changing the speed limit."

62. Of the 18% who did not agree with the balance of costs and savings:

- 16 gave no comment or did not give a reason for disagreeing with the IA analysis.
- 1 did not understand the IA or consultation, complaining that both the consultation document and the IA were not comprehensible.
- 1 was critical of the proposal in general.
- Another felt that the balance of costs and benefits is irrelevant.
- 2 responses mentioned that there would be costs to recalibrate speed limiters, but speed limiters will not be recalibrated as part of this policy.

63. Of the other respondents not in agreement:

- 23 thought that costs relating to accidents and casualties had not been given sufficient value or that the impacts on vulnerable users or active travel had not been fully analysed.
- 8 also believed the negative impacts on the environment (noise and emissions pollution) were not considered.
- 7 thought the fuel costs would be higher as a result of the speed limit increase.
- 7 felt that there would be little or no savings.
- One felt that the costs had been over-estimated and 3 others felt that the benefits would affect smaller companies and road users in general.
- 6 believed that, as HGV drivers exceed the existing limit, they would exceed the new limit as well.
- 5 disagreed there were enforcement difficulties, and thought the current limit should be enforced.
- 4 believed that more analysis is needed, including routing costs/savings, with another suggesting that the baseline should be the current speed limit as supposed to the average actual speed.
- 2 felt that too much bias/emphasis was put on HGV savings.
- Others mentioned that road wear and maintenance costs will be higher, 3 also mentioning costs related to changing road signing.

64. Comments from those not in agreement included:

"I expect road accidents to increase and their serious[ness] to increase also - costing tax payers money."

"Higher speed equals higher fuel costs and goes against the government's plans to reduce emissions."

"Fuel consum[p]tion would increase as would emissions as we see when vehicles travel at 60MPH on Motorways."

Government response

- 65. The Department notes the majority view that the impact assessment reflects respondents' experiences and expectations.
- 66. The root of many of the comments from respondents who did not agree with the IA appears to be not agreeing with, or not understanding, the Department's view that actual speeds are not likely to change as the speed limit is increased for HGVs over 7.5t on dual carriageways. We have addressed this in our response to Question 5.

Question 4: Are there any negative impacts of the current speed limit other than those referred to in the Impact Assessment?

- 67. 452 responded to this question. The majority, 313 (69%), thought there were no negative impacts of the current speed limit to be added to the impact assessment.
- 68. 139 (31%) respondents thought there were additional impacts:
- 69. 20 thought the existing limit contributed to congestion. A road user said:
"Dual carriageways are constantly clogged by trucks trying and failing to overtake each other, causing long tailbacks and increasing the risk of accidents as drivers become more frustrated".
- 70. 13 thought the lower limit contributed to potentially dangerous overtaking manoeuvres. A haulage company commented:
"I feel that the safety impact of the current speed limit, i.e. it causes car drivers to overtake in dangerous situations has not been highlighted, and this is one of the most important considerations for increasing the speed limit to 60mph."
- 71. 11 thought the lower speed limit caused greater fuel consumption / emissions claiming that modern engines are more efficient around 56mph.

Of this group 4 thought that as HGVs carried less momentum at the lower speed limit, it was necessary to change down through gears when meeting an uphill section of road, resulting in higher fuel consumption/emissions and lower mean uphill speed, adding to congestion. A haulage company commented:

"They [the current speed limit] increase overall fuel consumption as when an LGV approaches an incline at the lower speed it has to change

down more gears (therefore higher revs and fuel use) than if it approached it at a higher speed. It also has a negative impact on journey times and by default increases the number of LGV's on the road at any one time."

72. 11 thought the existing limit resulted in slower journey times increasing commercial pressures and driver fatigue.

One HGV driver said:

"Driver Fatigue from driving at a slow restricted speed over a long distance."

Another commented:

"To[o] much time looking at the speedo. With the proposed raise in speed limit the driver can leave the speed control to the speed limiter and concentrate on driving and mirrors."

And a road user said:

"Slower freight transit times increase the time & thus cost of moving freight by road which makes the haulage industry less competitive compared to rail or air which is not subject to the same vehicle type based speed limitations."

Government response

73. The Department does not consider that actual HGV >7.5t speeds are likely to increase, so the negative effects identified of poor fuel efficiency at 53 mph and driver fatigue at this speed may not be mitigated by the change.
74. It is however possible that there will be marginal improvements by reducing delays to other motorists behind overtaking HGVs and sudden braking by other traffic when an HGV is overtaking. These effects would only materialise if actual HGV speeds increased.

Question 5: Do you think that HGVs would be unlikely to increase their speed on dual carriageways as a result of this proposal?

75. 429 respondents answered question 5.
76. The majority of respondents 272 (63%) answered no to this question, meaning that they thought HGVs would increase their speed on dual carriageways as a result of raising the speed limit to 60mph.
77. The main reasons given by those that answered no were:
- 20 respondents thought that as HGVs are already breaking the existing limit they are likely to break any raised limit too.

- 15 thought commercial pressures will force HGVs to increase their speed.
- 13 believed that HGVs will drive at the speed limiter setting.
- 10 thought that HGVs will drive to the speed of other traffic.
- 9 thought the average speed of HGVs would increase because some of the 20% of drivers complying with the current limit will increase their speed.

78. Some respondents seemed unaware of the requirement for HGVs to be fitted with speed limiters calibrated at a maximum speed of 56mph and thought HGVs would drive at the new limit. Some others erroneously thought speed limiters would need to be recalibrated to a higher speed.

"I think it would be a good idea to increase the speed for HGV's from 50-60 on single and dual Carriage Ways, but there is a problem in your thinking. All HGV's over 7.5 ton[ne] are speed limited to 56mph, so it would mean getting every Lorry in the UK changed so they can travel at 60mph."

One road user commented:

"If HGVs break the current speed limit as they are impatient/ ignorant of the law/ have no regard for vulnerable road users, it is because they see no prospect of being penalized (unless they drive repeatedly at a speed hugely in excess of the limit). Raising the limit simply re-sets the speed they will drive, above the new limit."

79. Of those who thought HGV speeds would not increase 11 cited agreement with the argument given in the impact assessment. A local authority said:

"Since the evidence presented states that average free flow HGV speed on motorways is 53/54 mph, despite the 60 mph limit, and that average free flow HGV speed on dual carriageways is currently 53 mph, this strongly suggests that an increase in the speed limit will not result in higher HGV speeds."

80. 34 respondents thought that speeds would not increase as HGVs were already travelling at the speed limiter maximum. A haulage company commented:

"As most HGV's are limited to 56 mph they currently tend to ignore the current speed limit and travel at 56 mph anyway and this would remain the case."

81. Of other comments received, one local authority said:

"All trucks are currently fitted with speed limiters, limited to a maximum of 85kph (approx. 53mph), with a sizeable minority of truck operators choosing to limit trucks to lower speeds in an effort to improve fuel efficiency. Raising the speed limit to 60mph will not result in trucks

actually travelling at 60mph, but will de-criminalise the vast majority of truck drivers who exceed the current limit, albeit by only 2 or 3 mph."

82. Please note: The consultation response template provided for email responses originally contained different wording to that in the online questionnaire. This template was corrected and 59 respondents were contacted and invited to return a response to the correct question. 21 of those contacted kindly replied and their responses have been included in this analysis. Of those who answered the other version of the question 'Do you think that HGVs are unlikely to drive faster on dual carriageways than on motorways?' 54% thought it unlikely that HGVs would drive faster on dual carriageways than motorways.

Government response

83. The requirement for HGVs over 7.5t to have speed limiters fitted and set at 56 mph will not change as a result of this policy. The Department therefore considers that HGVs could not exceed a 60mph limit (unless the speed limiters were tampered with, which is rare⁷). They will similarly be unable to drive at the speed of the rest of the traffic.
84. It is evident that HGV drivers do not drive faster than the speed limiter setting of 56mph on motorways despite the 60 mph limit. We therefore consider it implausible that they would do on dual carriageways, which are not designed to the same standards as motorways. In addition, as several consultees noted, many HGVs operating for large companies have their vehicles' speed limiters set lower than 56mph, for fuel efficiency reasons.
85. The Department does not consider that an increase in actual speed is likely, as set out in our impact assessment and above, but in response to the consultation feedback we have carried out a sensitivity test of the impacts on road safety and time savings if HGVs were to increase their speed.

Question 6: 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?

86. 464 responded to this question. 355 (76%) thought that an increase in speed limit would not lead to more HGVs using dual carriageways. The main reason given was that HGVs will already be using the quickest, most direct routes so would be unlikely to change. A resident on a rural road commented:

"Lorries go their own routes for their deliveries, the speed limit has little effect on this."

⁷ From April 2010-2014, The Driver and Vehicle Standards Agency issued an average of 110 prohibitions for speed limiter offences per year.

And another respondent said:

"It is possible that increasing the speed limit will encourage drivers of HGVs to use routes with dual carriageways, which tend to have low levels of frontage development, as opposed to local single carriageway roads, which would be a positive impact for communities on those roads. However, we do not believe this will lead to a significant increase in the volume of HGVs on dual carriageways."

- 87.** Of the 24% who thought more HGVs would use dual carriageways as a result of the change in speed limit, one HGV driver commented:

"If the speed limit is raised on dual carriageways, we the lorry driver would be more inclined to use them over a shorter single carriageway route wherever possible."

Government response

- 88.** The Department does not consider that HGV drivers will be more likely to use dual carriageways as a result of the speed change, because (as consultees noted) they tend to take the most direct route to their destination, which will involve dual carriageways where motorways are not available. The speed limit change will not change this.
- 89.** The Department does not consider that dual carriageways are likely to be more attractive than lower speed single carriageways as a result of raising the speed limit on dual carriageways, because there will be a 10mph difference between HGV >7.5t speed limits on single and dual carriageways both before and after the planned changes in speed limits – the relative attractiveness of the two types of road will not change.

Question 7: 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. 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?

If 'yes' please give details of which roads

- 90.** There were 446 responses to this question. 262 (59%) of respondents thought local authorities would not be likely to introduce local speed restrictions as a result of a speed limit increase on dual carriageways. A local authority said:

"No. In Hampshire dual carriageway roads that are subject to the national speed limit are either A or B-class roads. In line with previous DfT guidance we have recently assessed speed limits on all these roads taking into account all road users, and changes to limits are being made where it has been deemed appropriate. We do not, therefore, anticipate

introducing local speed limits on dual carriageways if the HGV speed limit is increased."

Another local authority said:

"We will continue to manage speeds, including the setting of speed limits on our local networks in accordance with the South Yorkshire Speed Management Strategy. At this stage it is not considered likely that the increase in speed limits on dual carriageways for HGVs over 7.5t will lead to a significant introduction of more local speed limit restrictions. It is estimated that in South Yorkshire we have only about 12 miles of local dual carriageway road which is subject to the National Speed Limit."

And a road safety group said:

"The speed limits should reflect local safety conditions regardless."

- 91.** Of the 11 local authorities responding to this question, 7 responded that they did not expect to introduce more lower local speed limits as a result of an increase in speed limit. Only 2 local authorities thought the introduction of more lower local speed limits would be more likely. One commented:

"This is considered unlikely in respect of the higher standard dual carriageways, but there may possibly be a need to review the case for a local speed restriction on the relatively small number of a lower standard dual carriageways (none of which in Oxfordshire are primary routes) if safety or other concerns were to arise assuming policy option 2 is implemented."

- 92.** Additionally, two local authorities did not indicate either 'likely' or 'unlikely', but provided comments. One answered that they were 'unsure' and the other commented:

"Reflecting the statutory duties placed on Highway Authorities, should an increase in HGV national speed limits on dual carriageways have adverse impacts then Highway Authorities will act accordingly. However as the West Midlands metropolitan area has few examples of national speed limit dual carriageways then any interventions are likely to be location specific."

- 93.** Of the other respondents who thought the introduction of local speed limits would be more likely if the speed limit were to be changed, a road user said:

"Certain dual carriageways with inclines will be more dangerous for all road users if 44t can traverse them at 60mph. We have to consider directional stability as well as braking efficiency."

And a road safety group commented:

"Local government is being encouraged to respond to local community concerns over speed, 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".

94. 6 respondents suggested road numbers where local speed restrictions may be introduced as a result of an increase in the HGV speed limit on dual carriageways.

Government response

95. The Government notes the responses, particularly those from local authorities, and considers that local authorities are unlikely to change road speed limits on dual carriageways if, as we expect, actual HGV speeds do not change. However we have recently written to all local authorities in England and Wales promoting the Department for Transport Circular 'Setting Local Speed Limits' containing guidance for setting local speed restrictions taking into account factors such as the history of collisions, use by vulnerable road users, road geometry, roadside development or possible risk to air quality limits. Local authorities can make their own decisions as to the need to lower speeds on local roads.

Question 8: 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?

If 'yes' please indicate what these may be.

96. Of the 251 responding to this question only 16 thought their organisation would incur publicity or conversion costs in addition to those related to the speed limit change on single carriageways.
97. Of these, 6 gave no details of anticipated additional costs incurred.
98. Of the remaining 10, only 4 organisations cited publicity or conversion costs. No organisation provided a quantitative estimate of costs.
99. One road safety group commented:

"Change of website info (unless linked to DfT) Change of info contained in printed publications"

100. And a trade organisation commented:

"Apart from updating the ABD's website to show the revised HGV speed limits on both single- and dual-carriageway roads, there would be no other action required."

101. From the other 6 responses, 1 thought organisations such as Sustrans, CTC, and Bikability would incur costs, 1 mentioned increased fuel consumption and 4 mentioned cost of recalibrating speed limiters.

Government response

102. The Department has noted the responses and is pleased to note no significant additional costs are anticipated.