



Department
for Transport

Consultation Response Report

Examining the Speed Limit for Military Armoured Track Laying Vehicles on Public Roads in England and Wales:
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 the high majority of respondents in favour of a speed limit increase and those people concerned about the proposal.

After careful consideration I have decided to proceed with plans to increase the speed limit for military armoured track laying vehicles (AVT) from 20mph to a maximum 40mph (dependent on vehicle specific safety cases) on public roads in England and Wales.

The increase will allow realistic training to satisfy the operational need for AVT crews to be competent and experienced in driving and manoeuvring their vehicles on public roads in England and Wales at the speed of traffic amongst civilian drivers. This will enable them to do so safely on operations both at home and worldwide.

It is also likely to be safer for other road users and the crews of AVT if they travel at speeds in excess of 20 mph, thereby reducing the hazard caused by large slow moving vehicles transiting on fast-flowing public roads.

The speed limit increases for AVT will be implemented via a change in the law to be laid in Parliament during the next few months, with implementation scheduled for October 2015. The existing limit will continue to apply until the change has been put into effect. The amended speed limit will cover public roads in England and Wales, unless specific lower local or urban speed limits are in effect.

Andrew Jones MP, Parliamentary Under-Secretary of State for Transport

Part 1 - Introduction

1. The maximum speed limit for MoD armoured track laying vehicles (AVT), e.g. tanks, armoured personnel carriers etc, on public roads is 20mph, as prescribed in Schedule 6 of the Road Traffic Regulation Act 1984, which applies to Great Britain. Vehicle specific speed limits are devolved fully in Northern Ireland and partly 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. Since 1977, up until 2013, AVT have been operated on public roads in England and Wales under a mistaken understanding that such vehicles enjoyed a dispensation from the 20mph restriction for track laying vehicles. Consequently, when travelling to and from training areas and during driver training, vehicles were operating at speeds of up to 40 mph for vehicles of less than 40 tonnes and up to 30mph for those over 40 tonnes in accordance with Ministry of Defence (MoD) Armoured Vehicle Standing Orders¹.
3. The consultation examined the case for an increase in increasing that 20mph limit to allow MoD AVT to travel on public roads at up to a maximum 40mph (subject to standing orders) as they had been doing up to late 2013 with no recorded serious road accidents where speed was a causal factor.
4. In this consultation we sought views on whether to:
 - a. Do nothing – retain the existing national 20mph limit for AVT on public roads in England and Wales.
 - b. 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).
 - c. Any further options not identified in this document.
5. We also asked for more information on the impacts of increasing the speed limit, in particular:
 - a. The operational benefits of training AVT drivers at speeds of up to 40mph on public roads.
 - b. AVT speeds and road safety.
 - c. Higher fuel consumption and emissions related to the 20mph speed limit.

¹ Armoured vehicle standing orders impose a speed limit for a class of vehicles based on vehicle specific safety cases.

- d. AVT vehicle component wear and tear related to the 20mph speed limit.
 - e. Evidence to support and quantify possible time saving benefits of an increased speed limit including:
 - i. Typical distances travelled for training or to and from training areas.
 - ii. Average annual mileage in support of recruitment events and operations (By key training area if possible).
 - iii. Total annual mileage for AVT on public roads.
 - iv. The number of vehicle movements per year.
 - v. Average speeds currently obtained by AVT on public roads.
 - vi. The expected increase in average speed. Would ATV routinely achieve 30mph/40mph on public roads as a result of the proposed increase in speed limit?
 - f. Other negative impacts related to 20mph speed limit.
 - g. Potential ill health effects of prolonged driving below optimum vehicle design speeds.
6. 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 24 April 2015.
 7. To promote the consultation to those living or using roads in areas experiencing the highest numbers of AVT activity on public roads the Department issued a press notice to local media covering the locations of the 7 key training camps in England and Wales. In addition notification of the consultation was sent to local authorities and police forces covering the key training camps.
 8. 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	Please indicate which of the following categories best represents your interest in this consultation. <ul style="list-style-type: none"> ● Local authority (please provide details). ● Road user – motorist. ● Road user – Other (please provide details).

	<ul style="list-style-type: none"> • Government enforcement body, police force and similar organisations (please provide details) • MoD/Member of the armed services. • Road safety group (please provide details). • Other (please provide details)
<p>2</p>	<p>Do you live, or use public roads, in the vicinity of a key training area (as listed at paragraph 1.33 in the consultation document)?</p> <p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>If your answer is 'yes' please indicate which one</p> <ul style="list-style-type: none"> <input type="checkbox"/> Wiltshire and Hampshire - Salisbury Plain <input type="checkbox"/> Dorset - Bovington and Lulworth <input type="checkbox"/> Pembrokeshire – Castlemartin <input type="checkbox"/> Cumbria – Warcop <input type="checkbox"/> Yorkshire – Catterick <input type="checkbox"/> Northumberland – Otterburn <input type="checkbox"/> Norfolk - Thetford
<p>3</p>	<p>Please consider the following policy options:</p> <ul style="list-style-type: none"> • 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? <p>Please indicate your preferred option</p> <ul style="list-style-type: none"> <input type="checkbox"/> Policy Option 1 (Do nothing). <input type="checkbox"/> Policy Option 2 (Raise speed limit to 40mph). <input type="checkbox"/> Other. <p>Please give your reason for choice of Option 1 or 2 or if you consider there to be other options, please explain fully and give any supporting evidence you may have.</p>

4	<p>Do you think that AVT operational benefits will result from an increase in speed limit for AVT on public roads?</p> <p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>Don't know <input type="checkbox"/></p> <p>Please explain your answer and provide any evidence you may have.</p>
5	<p>Do you think that an increase in speed limit on public roads is necessary to allow vehicle crews to be properly trained?</p> <p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>Don't know <input type="checkbox"/></p> <p>Please explain your answer and provide any evidence you may have.</p>
6	<p>Do you think that AVT movements restricted to the current 20mph limit contribute to congestion on public roads?</p> <p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>Please explain your answer and provide any evidence you may have.</p>
7	<p>Do you think that an increase in speed limit for AVTs will reduce congestion on public roads?</p> <p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>Please explain your answer and provide any evidence you may have.</p>
8	<p>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?</p> <p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>Please give your reasons and provide any evidence you may have.</p>
9	<p>Do you think the current 20mph restriction for AVT presents a greater hazard to other road users than the proposed higher speed limit?</p> <p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>Please give your reasons and provide any evidence you may have</p>

10	<p>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?</p> <p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>Don't know <input type="checkbox"/></p> <p>Please give your reasons and provide any evidence you may have.</p>
11	<p>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?</p> <p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>Don't know <input type="checkbox"/></p> <p>Please give your reasons and any evidence you may have.</p>
12	<p>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?</p> <p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>Don't know <input type="checkbox"/></p> <p>Please give your reasons and any evidence you may have.</p>
13	<p>Do you think an increase in speed limit would provide significant time savings for AVT driver training and transit to and from training areas?</p> <p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>Don't know <input type="checkbox"/></p> <p>Please explain and provide any evidence you may have.</p>
14	<p>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?</p> <p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>N/A <input type="checkbox"/></p> <p>Please provide any data you may have.</p>
15	<p>Do you have any experience of ill health effects after operating AVT at 20mph?</p> <p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>N/A <input type="checkbox"/></p>

	Please explain your answer and provide any evidence you may have.
16	<p>Do you think there are any other impacts of the proposed increase in speed limit for AVT not listed in this document?</p> <p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>If 'yes' please explain and provide any evidence you may have.</p>

Part 2 - Executive Summary

9. The Department received 348 responses in total. We are pleased with the high response rate and grateful for the time people took to reply. Responses to the consultation will be used to inform the Government's decision on next steps.
10. There was a total of 322 online response records. However, of these, under options (question 3), one responded "other" but gave no further detail. On question 14, the same respondent answered 'not applicable' and did not answer any of the remaining consultation questions. Consequently this response has been removed, reducing the total number of online responses to 321.
11. 26 responded to the consultation by email.
12. Therefore the total number of responses for the purpose of this summary is 347.
13. Of the 347, 12 did not indicate a sector that best represented their interest. From those that did the respondents were categorised into seven groups:

Group	No.
Local authority	2
Road user – motorist	135
Road user – Other	5
Government Enforcement body, police force and similar organisations	5*
MoD/Member of the armed services	163
Road safety group	3
Other	22
Blank	12
Total	347

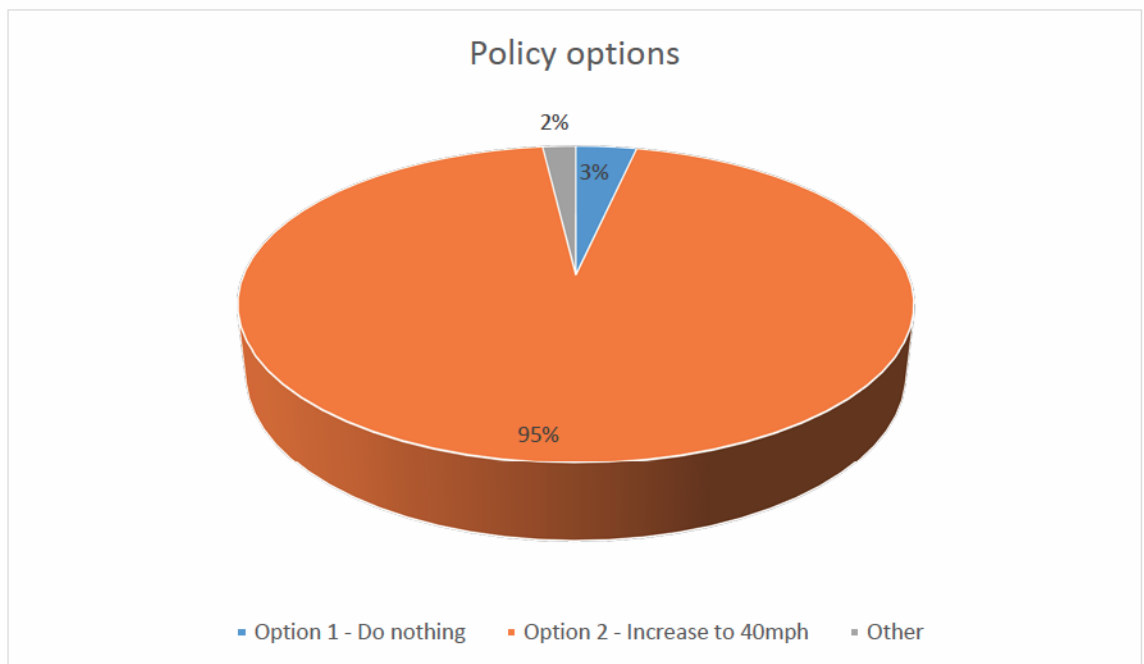
*One respondent gave no detail of type of enforcement body and another gave police force detail and location but no further responses.

14. 240 (72%) of 332 respondents indicated that they lived and/or used public roads in the vicinity of one or more of the seven key training areas in England and Wales of which 237 gave details of which area(s).

Training Area	No.
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Wiltshire and Hampshire - Salisbury Plain	107
Dorset - Bovington and Lulworth	89
Pembrokeshire – Castlemartin	0
Cumbria – Warcop	0
Yorkshire – Catterick	28
Northumberland – Otterburn	5
Norfolk - Thetford	6
All areas	2
Total	237

15. 30 respondents did not indicate a preferred option under question 3. Of the 317 respondents who did, a large majority, 300 (95%) supported Option 2 - to raise the national speed limit for AVT from 20mph to 40 mph on public roads in England and Wales. The main reasons given for supporting this option were operational training benefits and potential improvements in traffic flow, congestion and road safety as a result of a reduced speed differential between AVT and other traffic.



16. Support for this option was split roughly equally between MoD/member of the armed forces (51.5%) and other respondents (48.5%).
17. Two out of the three road safety groups and the three identified police forces responding to the consultation supported this option.
18. Only 11 (3%) respondents supported option 1, to retain the 20mph limit. The main reasons given were road safety and road maintenance concerns.
19. Only 6 (2%) respondents suggested other options. Suggestions under 'other options' included:

- A higher speed limit than that proposed. (2 responses).
 - Increase the speed limit to 30mph or have local speed limits to suit the roads in particular areas (1 response).
20. Of the 295 who gave an opinion, the majority, 284 (96%), thought that operational benefits would result from increasing the speed limit to 40mph. The main reason given can be summarised as 40mph provides a more realistic training environment and therefore vehicle crews would be better able to perform safely and effectively when deployed operationally (question 4).
 21. The majority of respondents, 296 (95%) of the 310 who gave a view, thought that an increase in speed limit was necessary for vehicles crews to be properly trained to a level of competence to operate safely on public roads at operational speeds (question 5).
 22. 296 (94%) of 314 respondents thought the current 20mph speed limit for AVT contributed to traffic congestion, many commenting that slow moving vehicles on roads with few safe overtaking opportunities caused hold ups for other vehicles (question 6).
 23. 291 (93%) of 312 respondents thought that that an increase in speed limit for AVTs would help to reduce that congestion (question 7).
 24. Following enforcement of the 20mph limit the MoD have reported a number of 'near miss' incidents by other vehicles overtaking AVTs. The majority of respondents, 292 (94%) of 311, thought an increase in speed limit for ATVs likely to reduce the incidence of potentially dangerous overtaking manoeuvres as other road users would be less frustrated and have less inclination to overtake if travelling faster. Only 19 thought this would not be the case as even at the higher speed other road users would still attempt to overtake AVT (question 8).
 25. 284 (92%) of 310 respondents thought that AVT restricted to 20mph presented a greater hazard to other road users mentioning dangerous overtaking and fast moving vehicles encountering slow moving AVT unexpectedly on roads with short sightlines. Some others thought that a 20mph restriction increased AVT driver fatigue and reduced concentration (question 9).
 26. However a small number of respondents, 26 (8%) disagreed with this view for reasons including that when accidents do occur, they are likely to be more severe, lower speed allows for more reaction time to avoid accidents and increased stopping distances at higher speeds.
 27. 208 (89%) of 233 respondents agreed with the DfT view that an increase in speed limit for AVT would not lead to an increase in road wear and tear due to the manner in which the load is spread, the protective rubber pads fitted to the tracks and the way the tracks are laid down on the road surface. Some respondents thought there would be less wear due to the friction effects

- between the tracks and the road surface being greater at slower speeds (question 10).
28. Reasons given by the 25 (11%) respondents who thought that road wear and tear would increase as a result of a higher speed limit included - possible additional damage to roadside kerb stones and there may be more wear but perhaps a different road surface could be considered in the areas around training camps.
 29. On considering the effect of the 20mph speed limit on AVT fuel consumption, 252 (95%) of 265 respondents offering a view thought fuel usage and emissions would be greater. This was largely due to the difference between 20mph and the vehicles' design speeds requiring the selection of lower gears leading to higher engine revolutions (question 11).
 30. The MoD report an increase in fuel consumption of between 5% and 7% since the 20mph restriction.
 31. 241 (93%) of 259 respondents thought that the 20mph limit leads to greater vehicle component wear and tear also citing higher engine revolutions leading to increased wear on vehicle components for the same distance travelled along with detrimental effects of higher levels of vibration experience travelling a lower speeds (question 12).
 32. 270 (95%) of 284 respondents thought that an increase in speed limit would result in significant time savings when training or travelling to and from training areas on public roads (question 13).
 33. The MoD estimate a saving of 40 minutes for every AVT driver trained and that at least one additional test per day would be possible. A saving is expected for transit to and from training areas but it has not been possible to quantify this.
 34. The impact assessment for an increase in speed limit to 40mph estimates this time saving equates to approximately £11k per year.
 35. A small number of respondents, 14, thought that there would not be significant time savings the main reason given that most army camps are close to the training areas and for longer journeys transporters would be used.
 36. Question 14 called for data on the number of miles driven annually on public roads in England and Wales. Only seven responded they could provide data but of the five providing further comment, only two respondents said that it would be possible to provide data for England and Wales, with one questioning the value to do so as annual mileage totals fluctuate significantly from year to year. The Department therefore consider it would be disproportionate to pursue further data in addition to that already provided by the MoD. A road user - motorist thought that armoured infantry battalions do not train at ARMCCEN but on public roads in their garrisons.

37. 42 respondents reported experiencing ill health effects after operating AVT at 20mph. Symptoms reported included tingling in the feet and/or hands, stiffness to joints and temporary hearing impairment/tinnitus (question 15).
38. 205 respondents answered they had not suffered ill health effects.
39. 47(16%) of 302 respondents thought there were impacts of the increase in speed limit other than those referred to in the consultation document. Of those impacts suggested which were actually not mentioned in the consultation document, noise (4 respondents expecting higher noise levels and 2 lower) and damage to armed forces' public image when restricted to 20mph on public roads (4 respondents), were the most common (question 16).

Next steps

40. The Government has carefully considered the responses to this consultation. The proposal essentially means a return to the situation prior to 2013 when AVT had been travelling at up to 40mph on public roads and the MoD record no serious accidents where speed was a causal factor. Given the operational need for military AVT crews to be trained to a level where they can drive safely and confidently on public roads when deployed, there is no negative impact on road safety or road maintenance requirements and the high level of support from those responding to this consultation for an increase in maximum speed limit for AVT, the Government intends to increase the maximum speed limit from 20mph to 40mph for military AVT on public roads in England and Wales.
41. The Military will continue to use Armoured Vehicle Standing Orders to set appropriate speed limits for different classes of vehicles, and any local 30mph or 20mph speed limits would take precedence over the revised AVT limit. The proposed increase will apply to military AVTs only. Non MoD track laying vehicles will continue to be restricted to the existing 20mph maximum speed limit.
42. We will now make the necessary regulatory changes to enable the new speed limit to come into force in autumn 2015.

Part 3 - Detailed Summary of Responses

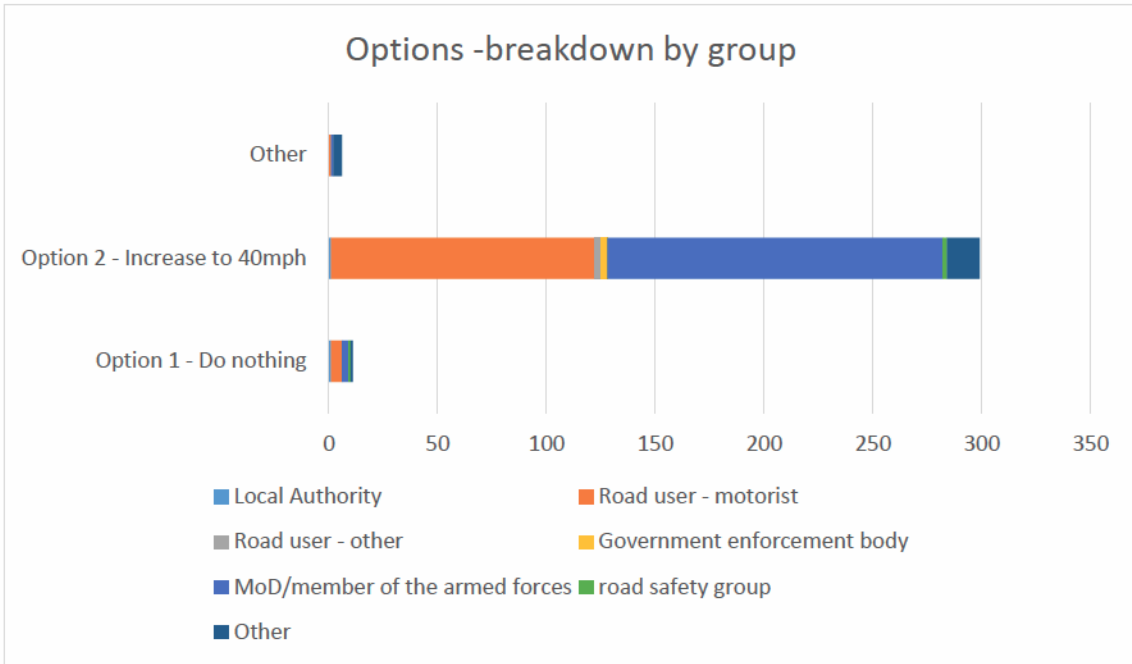
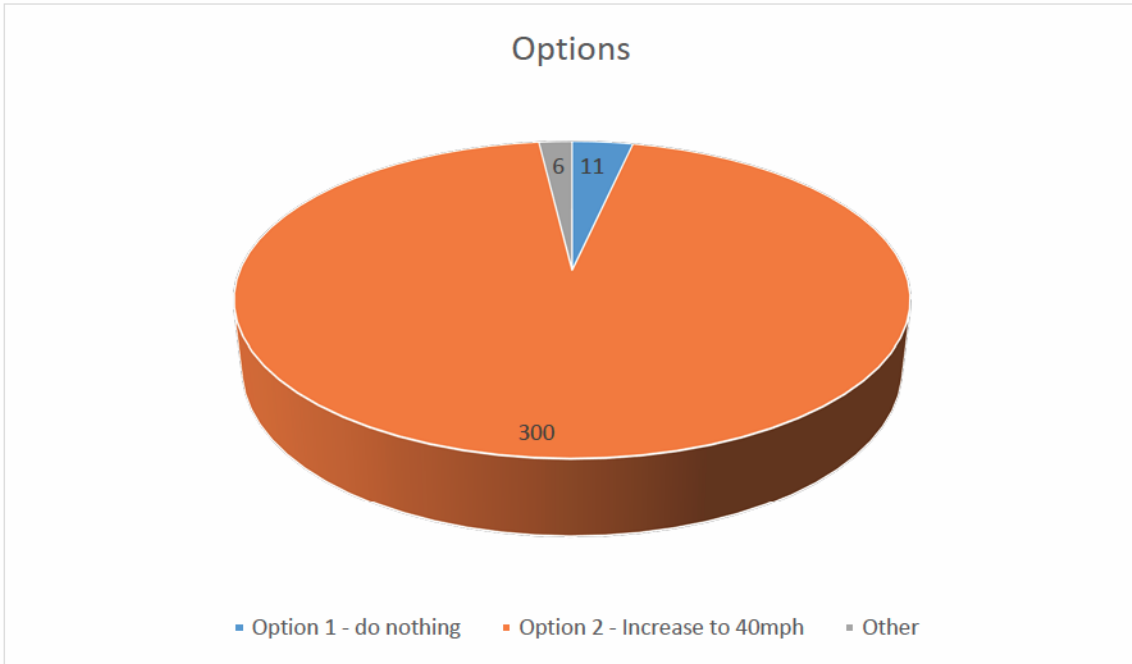
43. **Question 3 Please consider the following policy options:**

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

44. 317 respondents answered question 3.

Option	No.
Option 1 - Do nothing	11
Option 2 - Raise to 40mph	300
Other	6
Total	317



Option 1

- 45. Of the 11 (3%) who were supportive of maintaining the status quo, five described themselves as road user - motorist, three as MoD/member of the armed services, one local authority, one road safety group and one as 'Other'.
- 46. Of these, eight gave the reason for their view with the most common being road safety (3).
- 47. A parish council said:

'The Parish Council believes that there is a greater danger of learner AVT drivers crashing at a higher speed than cars overtaking them.'

48. And a road user - motorist said:

'Although the current speed limit is 20mph I believe this is being exceeded and an increase to forty mph will result in a higher probability of RTAs [road traffic accidents] leading to fatalities.'

49. A road safety group said:

'The safety implications for all road users would be detrimentally affected with an increase to 40mph. Vulnerable road users such as pedestrians, cyclists and powered two wheeler riders would be at greater risk of serious or fatal injury if in collision with an AVT travelling at 40 mph instead of 20mph. Where civilian vehicles encounter an AVT and attempt an overtaking manoeuvre there is more risk of that manoeuvre going wrong, and the subsequent consequences being more severe, if the AVT is travelling at higher speeds. We consider the DfT's statement that the proposals are in pursuit of safer roads to be spurious and misleading.'

50. Other reasons given included road maintenance (one) and there being no operational requirement for an increased speed limit (one).

51. A road user – motorist thought:

'Armoured vehicles do enough damage to the environment and the public highways.'

And a respondent from the 'Other' group, a former member of the Royal Armoured Corps said:

'AFV's [AVT] are, by their very nature, a cross country rough terrain vehicle. I served in BAOR for 18 years on Tanks (Centurion/Chieftain) and never needed to attain speeds above 15 to 20 MPH ON THE ROADS to achieve our aim of getting from A to B safely. In times of conflict the rules change and an Army does what it needs to do.'

Option 2

52. Of the 300 (95%) who supported raising the speed limit for AVT on public roads in England and Wales to 40mph, 154 described themselves as Mod/member of the armed services, 121 as Road user - motorist, 3 as road user - other, 1 as local authority, 4 as Government enforcement body, 2 as road safety group, and 15 as 'other'.

53. The most common reasons given for supporting this option were:

54. 89 respondents thought an increase in speed limit was necessary for training of AVT crews to meet operational needs.

A road user - motorist said:

'We are ham-stringing our military by introducing unnecessary and inappropriate restrictions upon their training. Our forces need our support not further difficulties.'

Another road user - motorist said:

'Even main battle tanks, let alone lighter armoured reconnaissance vehicles are perfectly safe at speeds in excess of 20 mph on public roads. It is counterproductive to set an unnecessarily low speed limit that will adversely impact the value of crew training. Training in armoured fighting vehicles is very expensive. Any measures that degrade its value should not be imposed unless absolutely essential.'

And another said:

'How can you learn or be able to drive AFV in combat when you have only ever driven at 20 MPH?'

A road user - motorist said:

'We have an expectation that our troops will be sufficiently trained in the event of our needing to deploy them. There is a trend towards more urban conflicts presently and even in rural areas of conflict tracked vehicles rely on and use roads to move from one area of need to another. It would be against the interests of this country's defence to not allow military tracked vehicle drivers to be able to practice this skill.'

An AVT driver and maintenance instructor said:

'At the moment the training is unrealistic for the requirements of the Field Army'.

55. 72 respondents thought the current 20 mph speed limit a greater risk to road safety than the proposed higher limit with most citing a higher incidence of potentially dangerous overtaking by other road users.

The respondent for Dorset police said:

'...The road safety risks can be broken down into those caused by loss of control of the AVT and those caused by an error of a member of public colliding with an AVT. The AVTs are able to stop very quickly and stability will not be affected by this increase. With the level of training and supervision and the safety procedures in place, I believe that any increased risk from loss of control of an AVT, breakdown or army driver error will be minimal. The maximum speed of the smaller AVTs will be 40mph on the open road so the public still have more time to see an oncoming AVT than they would other classes of vehicle on the road..... The AVT commander wears a high vis jacket and there is an amber beacon, however the risks could potentially be further mitigated by the use of a high vis label or sign attached to the front of the AVT.... These risks have to be balanced against those caused by the 20 mph speed limit. This limit causes impatient motorists to carry out unsafe overtakes, particularly on the smaller AVTs which tend to travel further on the roads.... Dorset Police have not dealt with any serious collisions involving AVTs on the road (other than those being transported). The local neighbourhood Inspector is not aware of any community concerns. Dorset Police have no speed complaints recorded concerning AVTs.'

56. Dorset police also suggested road safety may be further enhanced if a large yellow sticker similar to that used for police vehicles were attached to the front of AVT when used for on road training.

The respondent for South Wales police said:

'I have read the document and cannot justify why the speed limit cannot be increased. As long as the users stay within the agreed limitations of use which the military have set out in the document, by carrying out risk assessments and proper training to the users.'

A MoD/member of armed services said:

'Having been instructing and commanding an AV[T] on local roads with the restriction in place, the behaviour of some drivers is poor and potentially dangerous. Overtaking is taking place whenever possible, regardless of the safety of other road users when carrying out the manoeuvre i.e. on blind bends and between vehicles in convoy....'

An AVT driving instructor said:

'The lower speed limit is proving to be extremely dangerous with frustrated road users making dangerous manoeuvres on dangerous roads at dangerous points in order to get past restricted tracked vehicles. I believe these are moves that would not normally be made by these road users and it is only a matter of time before there is a serious accident. Having worked as an instructor in Bovington since 2012 I have seen the results of this change in legislation, and it has not been a positive change.'

A road user – motorist (Ex-tank regiment) said:

'It is safer. Having spent a good many hours driving and commanding tanks and other tracked armoured vehicles on and off roads over many years, I am sure that 40 mph is safer. I saw many more foolish reactions from other motorists when I was moving at 20-25 mph, eg in a slow moving convoy, than when my tank was moving at 35 - 40 mph....'

57. 55 respondents said a higher limit would help reduce road congestion.

A road user – motorist said:

'I drive approximately 60,000 miles a year across large areas of the country. I have never encountered a problem until armoured vehicles started to drive very slowly, holding up traffic.'

A road user- other (professional public service vehicle driver) said:

'...I can see the logic of keeping the flow of traffic moving smoothly to avoid congestion, thus reducing the potential for shortened tempers in private motorists, and thus contributing to an increase in road safety. As a current PSV licence holder, and having been stuck behind slow moving Military Convoys before, I would definitely appreciate this excessively low speed limit being removed.'

58. 19 mentioned that an increase in speed limit would result in time/cost benefits from reduced travelling time, lesser fuel consumption and vehicle component wear.

A Mod/member of the armed forces thought:

'Policy 1 [do nothing] increases the cost to the public purse as vehicles operate at slower speeds for longer periods of time increasing wear on the vehicles.'

Another said:

'...AFVs are not designed to crawl along for long periods. Apart from the increase cost in fuel and wear, the gear changes and braking are more pronounced resulting in vehicles jerking and bucking...'

And another respondent said:

'..... Having driven and commanded heavy armoured vehicles on the road, travelling at slow speeds over a prolonged periods is detrimental to the vehicle....'

59. 18 mentioned that AVT were designed to travel at and were more manoeuvrable at speeds higher than 20mph.

An AVT instructor said:

'Armoured vehicle design has greatly improved with the regards to braking, steering and reliability and is more than capable of operating safely up to 40 mph. To stay with the 20mph limit presents a hazard in itself where it presents a hazard to other road user travelling at a greater speed.'

A road user – motorist said:

'The current 20 mph restriction is a "blanket" restriction aimed at tracked plant machinery. When designing & building armoured vehicles consideration is given to its ability to travel safely on public roads & comply with legislation. The current restriction is dated and not applicable in the case of modern armoured vehicles.'

60. Nine thought that the proposed speed limit would cause less vibration related ill health effects for vehicle crew members than the current 20mph limit.

An AVT driving instructor said:

'...I see a health and Safety issue developing, due to an increase in vibrations felt through the vehicle due to traveling along a road at a lower speed. I believe that under the Health and Safety Act 1974 section 2 the employees are not being provided with a safe place of work without hazard or risk, due to the fact that there is a risk of vehicles being involved in accidents and also that the vibrations in vehicles could lead to white finger type injuries.'

61. Two road safety groups supported this option. One commented:
"The RAC believes that slow moving vehicles on public roads, whether they are tractors or military armoured track laying vehicles can cause safety implications for motorists. Road users who follow

these vehicles are more likely to try to overtake them when it is not necessarily safe to do so, which puts not only themselves but other road users at risk. The RAC believes that increasing speed limits of these vehicles will reduce the likeliness of motorists overtaking them provided provisions within the MoD Armoured Vehicle Standing orders still apply.....'

And the other:

'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....'

Other Options

62. Of the six (2%) respondents suggesting other options, four described themselves as 'Other', one as road user - motorist, and one as MoD member of the armed services.
63. Suggestions received included:
64. Two respondents thought the speed limit should be higher than 40mph for some vehicles to reflect higher design speeds.
65. One suggested local variable speed limits depending on the terrain.
'...Other options are: - Increase the limit to 30 mph - Have local speed limits. e.g. 40 mph @ Bovington; 30 mph @ Salisbury Plain; 20 mph at Lulworth.'
66. One suggested road simulations of live traffic on MoD land.
67. One suggested 40mph for vehicles of up to 40 tonnes for vehicles where weight carrying track rollers are properly sprung.
68. And one thought that the increased limit should be extended to civilian armoured tracked vehicles.

Government Response

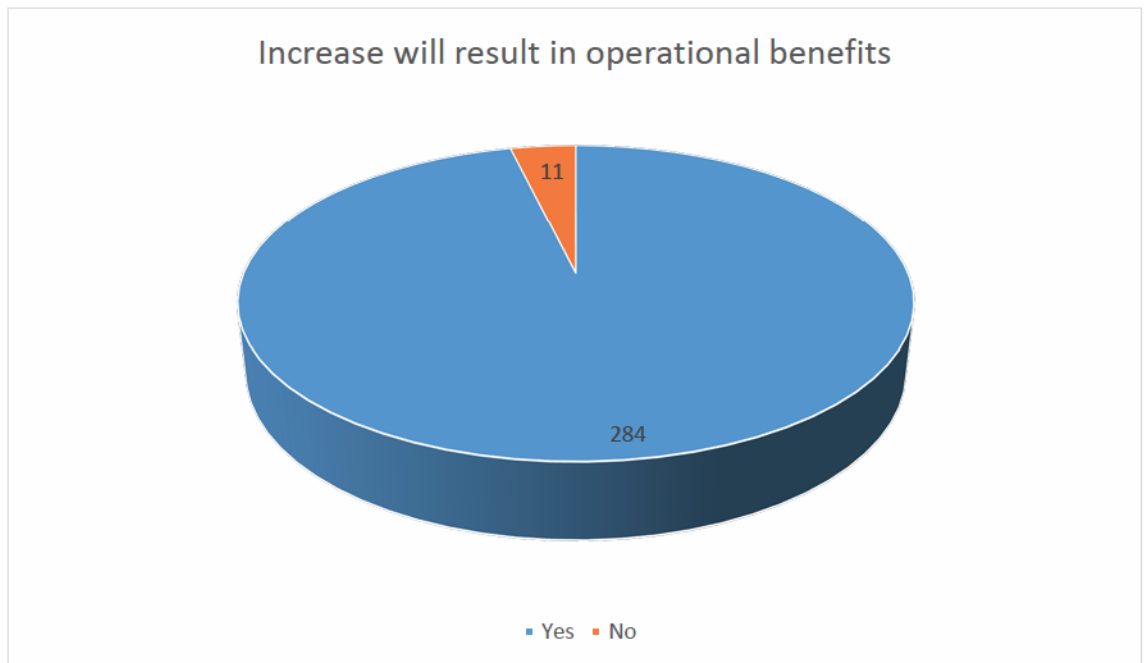
69. The Department notes that 95% of the respondents to the consultation supported an increase in the national speed limit for military AVT on public roads from 20mph to a maximum 40mph.
70. Road safety concerns were the main reason given by the 3% of respondents opposing the increase. However, 92% of respondents thought a higher limit would actually reduce the road safety hazard. The Department does not consider that road safety is likely to be negatively affected by increasing the speed limit to 40mph.
71. By reducing the speed differential between AVT and that of other road users the Department does however consider that the

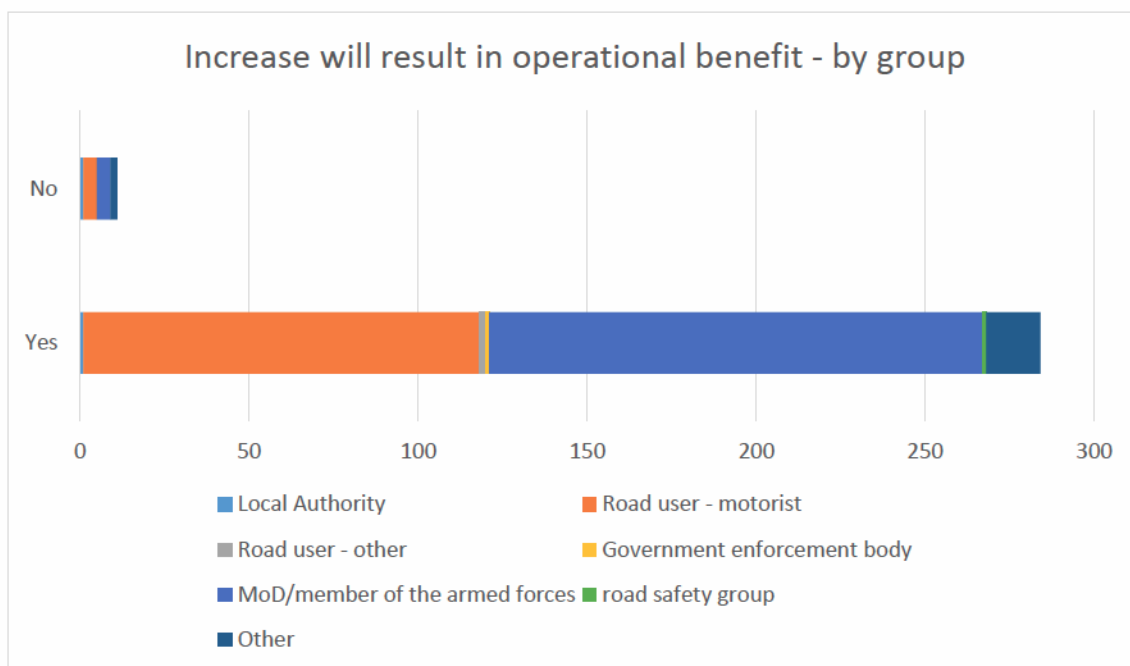
incidence of potentially dangerous overtaking is likely to be reduced.

- 72. Though the primary reason for an increase in speed limit is operational benefit to our armed services, the Department also expects an increase in speed limit will result in improved traffic flow in the vicinity of the key training areas as well as potential time and cost savings to the MoD.
- 73. As the primary reason for the increase in speed limit for MoD military AVT is to address an operational need and this does not apply in the case of civilian owned ex-military armoured tracked vehicles, the scope of the speed limit increase will not be extended to include civilian vehicles.
- 74. Having considered the evidence available and the responses to this consultation, the very large majority in favour of an increase, the Department is proceeding with changing the speed limit for military AVT from 20mph to a maximum 40mph on public roads in England and Wales. Actual maximum permitted speeds for individual vehicle types will continue to be set by the MoD based on risk assessment and safety cases for that vehicle type.

Question 4: Do you think that AVT operational benefits will result from an increase in speed limit for AVT on public roads?

- 75. 295 responded to question 4 with the majority 284 (96%) thinking an increase in speed limit would result in operational benefits.





76. Of the 96% who thought that operational benefits would result, an armoured infantry platoon commander commented:

'The next time the British Army deploys on operations it is likely to involve movement of AV(T)'s on roads with civilian traffic in that operational theatre, this will clearly not be restricted to 20mph. The ability to drive faster on roads in the UK will better allow us to acclimatise and train our vehicle crews for this.....'

A member of the armed services said:

'On operations, armoured vehicles will be required to use roads as well as operate off road. How can crewmen be expected to react to incidents at speed when on operations, when they haven't been able to get above 20 MPH in training?'

And a road user - motorist said:

'The Armed forces are more likely to use their vehicles on roads, than cross country when deployed in today's areas of operation.'

77. Of the 11 who did not think there would be operational benefits from an increase in speed limit, seven gave additional comments including:

A road user – motorist added:

'[There is] Little correlation between driving on British roads and being in a war zone. Little benefit to operational capability in my opinion.'

And a member of the armed services said:

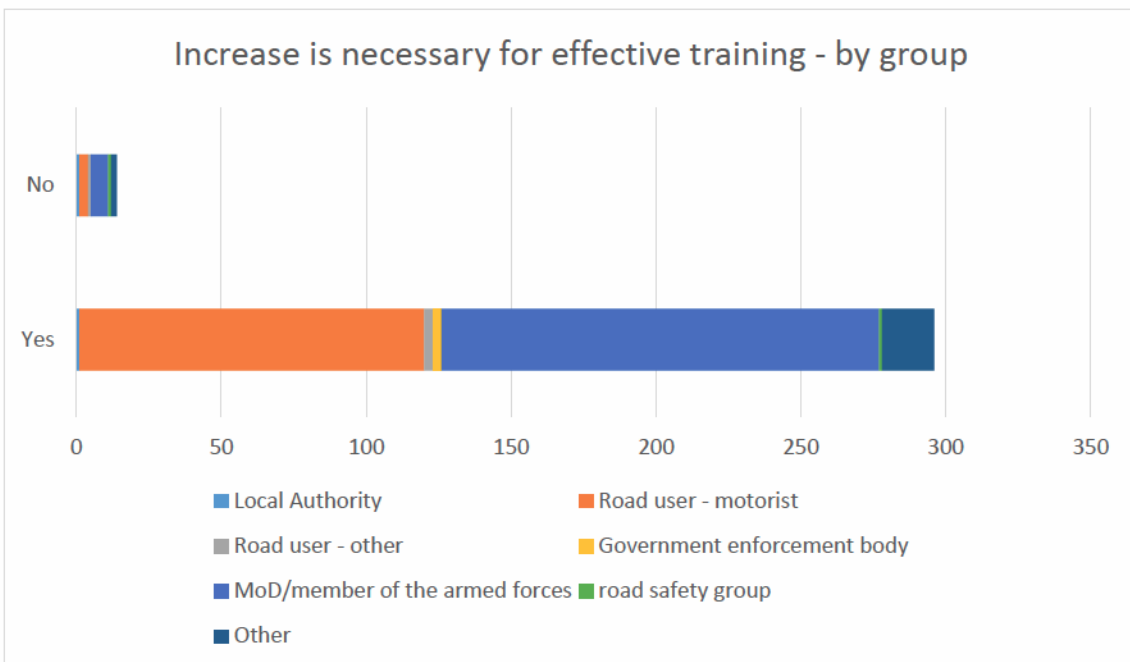
'Driving on roads and on Ops are two completely different experiences, the only benefits will be the reduction in 20mph rolling road blocks travelling around the country.'

Government response

78. The Department notes the large majority view and agrees that an operational benefit will result from a speed limit increase for military AVT.

Question 5: Do you think that an increase in speed limit on public roads is necessary to allow vehicle crews to be properly trained?

79. 310 responded to this question 5. The majority, 296 (95%), thought that an increase in speed limit was necessary for AVT vehicle crews to be trained to a competent standard.



80. Of the 95% who thought a speed limit increase was necessary for the proper training of AVT crew, a chartered engineer said:

'AVTs of all types are now more usually used in areas where civilian populations live and move. We need AVT crews to be familiar with this, to be able to operate safely at more representative speeds.'

a road user – motorist said:

'I have direct experience of rapid deployment of AVTs in Germany in the 1960s, where it was necessary to get to operational position in quick time. Training on public highways at 40mph gave drivers the experience of managing a 60 ton tank at that kind of speed. Without this training either deployment times would increase or road safety would be compromised if drivers with no experience of speeds above 20mph were required to deploy in the quickest possible time.'

a MoD/Member of the armed services said:

'Drivers undergoing training need to understand how to control and drive AVT at speeds greater than 20mph, and in the presence of other road users. Only by doing this in the UK will they be able to do the same in an operational theatre in the future.'

And another road user - motorist said:

'The drivers and commanders need to experience and understand the vehicle at its designed speed. It would be unsafe to run at those speeds only in emergency deployments without previous experience.'

81. Of the 14 respondents who disagreed that an increase in speed limit was necessary for the effective training of AVT crews nine respondents added a reason of which:
82. Five thought that it should be possible to create a training environment on MoD land to simulate live traffic conditions on public roads

A road safety group said:

'Vehicle crews should be able to receive sufficient training off highway (on roads within the military base, for example) without having to undertake training on the public highway.'

A road user - motorist and cyclist thought:

'Practice higher speeds on private M.O.D. roads.'

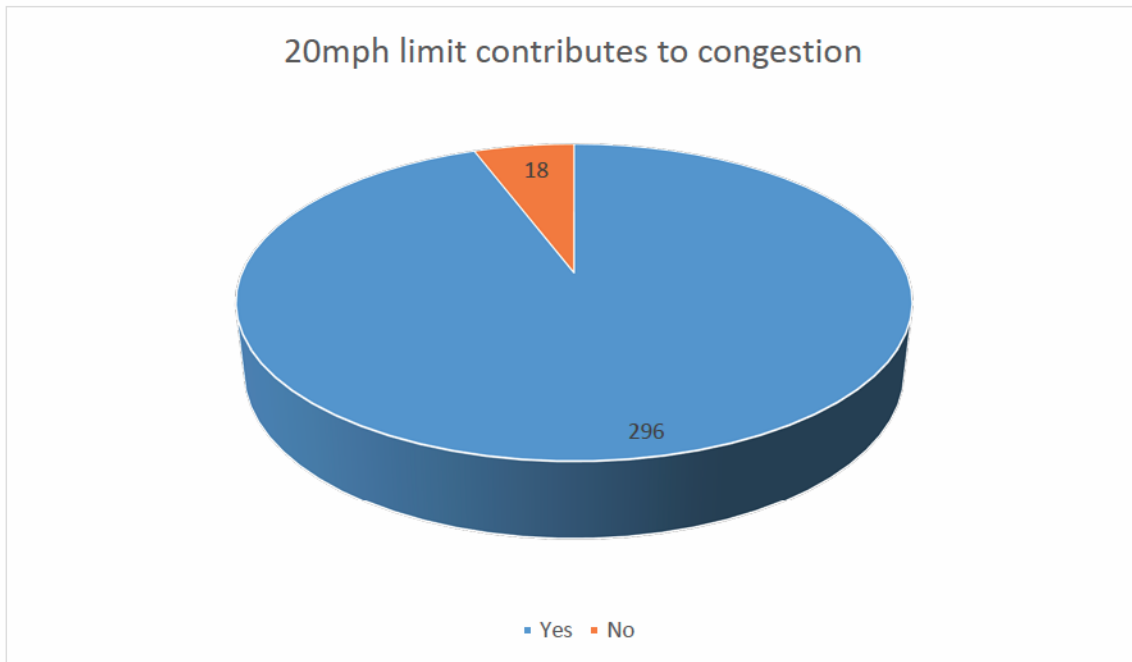
Government response

83. The Department notes the large majority view that the speed limit increase is necessary for the realistic training of AVT crew.
84. The Department agrees that it may be possible to build and operate simulated live traffic environments off of public roads. However, given the safety record for AVT on public roads over the 30 plus years at speeds of up to 40mph, the Department does not think that this is necessary or proportionate.

Question 6: Do you think that AVT movements restricted to the current 20mph limit contribute to congestion on public roads?

85. 314 respondents answered question 6.

86. The majority of respondents 296 (94%) thought the 20mph limit for AVT contributed to congestion.



87. The main reasons were the speed differential between AVT and other vehicles and the lack of opportunity to overtake slow moving AVT.
88. A professional public service vehicle driver said
'I've been stuck behind tracked military convoys before (Salisbury Plains area); getting past them is nigh-on impossible, so huge queues build up behind them.'
89. A MoD/Member of the armed services said:
'When the speed limit was clarified and reduced to 20mph the build-up of traffic within the garrison areas [Catterick, Yorkshire] more than doubled.'
90. A platoon commander in an armoured infantry battalion commented:
'Tidworth Road in Wil[t]shire is a wide, flat and reasonably straight single lane carriageway. Under normal conditions traffic easily moves at the speed limits of 50 and 60mph (and in a good number of cases exceeds this!) When AV(T)'s are forced to move down this road at 20mph this obviously causes a good deal of congestion.'
91. The most common reasons given thinking a 20mph limit did not contribute to congestion on public roads were:
92. Three respondents commented they had seen no evidence of congestion/increased congestion.

A MoD/Member of the armed services said:

'I've not noticed an increase in congestion around Warminsters.'

A road user - motorist said

'Living in proximity of an army base, I have seen no evidence of congestion.'

93. Three commented that it wasn't just AVT that caused congestion but other slow moving vehicles

A Parish Council commented:

'As there are numerous tractors who also use the roads it doesn't matter that there are few tanks going slowly as well.'

And a road user - motorist said:

'No - any vehicle moving at less than the majority of the traffic flow will cause congestion so it's not just AVTs'

94. One responding as MoD/member of the armed services thought the speed differential between AVT and other road users was not a significant factor:

'The difference between 20 and 40 mph is marginal when it comes to congestion, these vehicles are not operating on motorways but A roads so the speed difference will make little change'

95. While a technical consultant thought it was not the slow speed but the difficulty for over road users to overtake AVT to cause of congestion -

'...Congestion is caused when used on the A1, but that is more generally due to the width of the vehicles, rather than their speed. Passing a vehicle that is around 3.6m wide is tricky – and trickier at higher speeds as a greater safety margin needs to be left around it. On a normal country road, passing a heavy AVT at around 3.6m wide is frankly impossible, regardless of the speed of travel.'

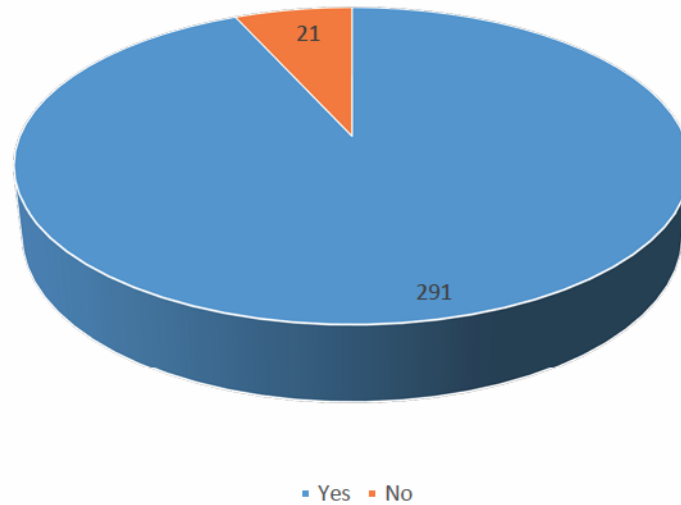
Government response

96. The Department notes and agrees with the majority view that the existing 20mph requirement for AVT contributes to congestion on public roads.
97. The Department would anticipate shorter journey times for vehicles travelling behind vehicles travelling at up to 40mph rather than the existing 20mph restriction.

Question 7: Do you think that an increase in speed limit for AVTs will reduce congestion on public roads?

98. 312 responded to question 7 of which 291 respondents (93%) thought that an increase in speed limit for AVT will reduce congestion on public roads.

Increase in speed limit will reduce congestion



99. The main reasons given for expecting reduced congestion at a higher speed was that at 30/40mph AVT speeds will be closer to that of other road users and would be on public roads (and therefore potentially causing congestion) for less time.

One road user – motorist commented:

'Roads onto which AVTs are primarily deployed have speed limits at or close to 40mph. therefore, AVT speed is unlikely to be the primary cause of congestion if allowed to operate at 40mph.'

Another said:

'It will allow AVT's to more realistically reflect normal traffic speed. If they are moving between training zones, they can do so swiftly and help keep traffic moving.'

A road safety group said:

'The RAC believes that increasing the speed limit will help create a more even flow of traffic, reducing long bottlenecks of vehicles following slow moving vehicles on stretches of road.'

100. 21 (7%) respondents thought an increase in speed limit would have little or no effect on congestion.

And another road safety group said:

'Even if the speed limit is increased to 40mph, on most rural roads, AVTs will still be travelling below the speed limit for civilian vehicles and hence tailbacks will continue.'

A road user - motorist said:

'40 mph or 20 mph - they will still hold up traffic at pinch points but no more than HGVs or tractors do already'

And another road user - motorist thought:

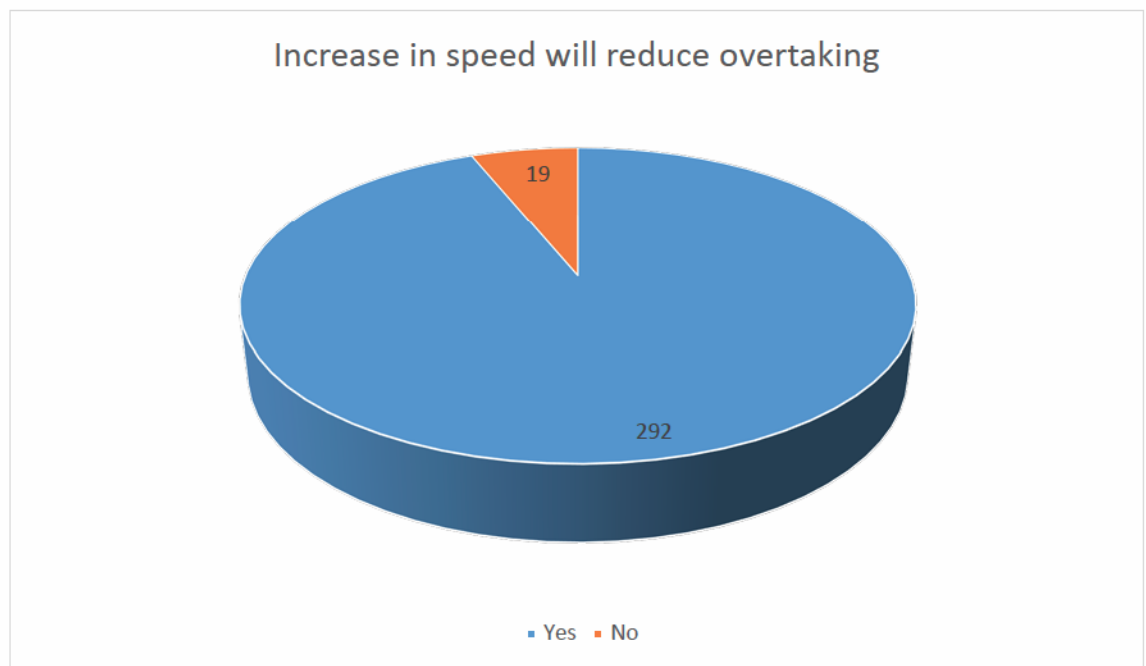
'It will still cause congestion but for a shorter period!'

Government response

101. The Department notes the large majority view that increasing the speed limit for AVT will reduce congestion on public roads.

Question 8: 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?

102. There were 311 responses to question 8 of which 292 (94%) thought an increase in speed limit for AVT would reduce the incidence of overtaking manoeuvres.



103. The main reason given was that other road users following AVT would likely be less impatient and less inclined to overtake if travelling at speeds closer to the road speed limits than the 20mph restriction allows.

104. An AVT driving instructor commented:

'Having been an instructor at ARMCEN through the change from 40 to 20 mph, I can confirm that the public are much more inclined to take life threatening risks the slower the AVT is going. They frequently misjudge the acceleration of their vehicle and will overtake on blind bends/summits or cut in at the end of crawler lanes forcing oncoming traffic to leave the edge of the marked road (solid white line). It does not matter whether the vehicle is a car or an unladen articulated HGV, they will still take that risk.'

105. A road user - motorist said:

'Yes, because 40 Mph is nearer the average rate of traffic running on the local roads....'

106. A Mod/member of the armed services commented:

'[at the higher limit] Less need to overtake between overtaking places due to slowness of traffic.'

107. A road safety group commented:

'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.'

108. Another road safety group commented:

'It is likely this will happen. Motorists who are generally stuck behind AVTs will be more inclined to overtake when it is unsafe to do so with the current 20mph speed limit restriction. We believe that increasing the limit will reduce the need for road users to take unnecessary risks by overtaking when they are impatient to do so.'

109. 19 respondents didn't think an increase in speed limit would reduce overtaking manoeuvres. The main reason given for this was that even at higher speed drivers of vehicles following AVT would still be impatient.

110. A road user motorist said:

'.....Poor driving behaviour and a lack of road knowledge seem to be the major factor in drivers overtaking vehicles. Increasing the AVT speed limit to 40mph would not reduce the risk as most of the major roads have a speed limit of either 50mph or 60mph.'

111. And another road user - motorist said:

'A speed increase won't stop idiot overtaking. Put a notice on the back of the AVT reminding car drivers to comply with the Highway Code...'

112. A technical consultant commented:

'A vehicle on an open, adequately wide single carriageway (eg A66 at Warcop) road might wish to pass a AVT at say 60mph. If the AFV itself is travelling at 40 rather than 20mph, the passing distance will increase greatly. That means more time on the "wrong" side of the road whilst passing – which is where the real danger lies. The transpennine section of the A66 is well known as a road where head on crashes occur as a result of bad overtaking decisions. Warcop is located in this area.....'

113. And a road safety group commented:

'....on most rural roads, AVTs will still be travelling below the posted speed limit, leading to tailbacks and driver frustration. However, there will be increased risks when drivers attempt to overtake AVTs travelling at 40mph rather than 20mph because of the speed differential and if something does go awry, the severity of a collision will be greater at higher vehicle speeds.....'

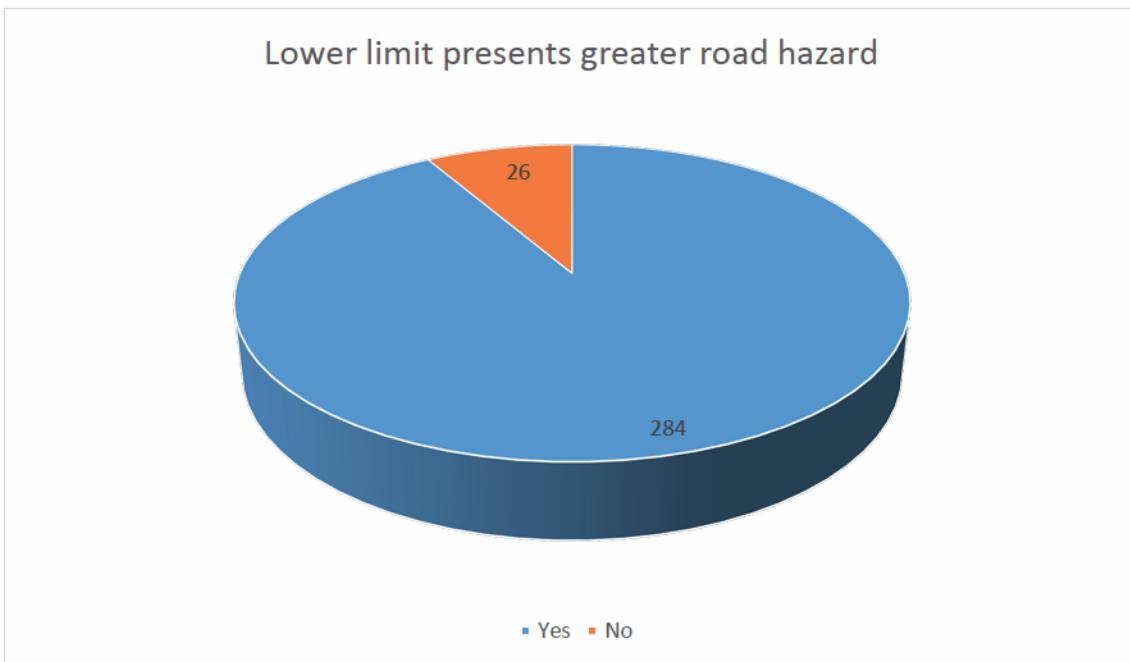
114. Three respondents commented it have been helpful if the consultation document had included the number of near misses for other road users overtaking AVTs prior to October 2013.

Government response

115. The Department has noted the majority response that increasing the speed limit to a maximum 40mph will reduce the incidence of potentially dangerous overtaking manoeuvres.
116. The Department also notes the comments that data for near misses when overtaking AVT prior to enforcement of the 20mph limit was not included in the consultation document. The reason being that data was not available for this period as the MoD only started logging 'near misses' as a result of a suspected increase in incidence following the reduction in AVT speeds to a maximum 20mph.

Question 9: Do you think the current 20mph restriction for AVT presents a greater hazard to other road users than the proposed higher speed limit?

117. Of the 310 responding to question 9, 284 (92%) thought the present 20mph speed limit for AVT presented a greater hazard to other road users than the proposed maximum 40mph limit.



118. The main reasons given for 20mph presenting a greater hazard to other road users were potentially dangerous other taking manoeuvres and the danger of faster moving traffic meeting large heavy slow moving vehicles on roads with short sightlines.

119. A MoD/member of the armed services said:

'Slow moving AVTs on a twisty country road are a danger to other users, many who are driving too fast and are not expecting to meet a

dark green coloured AFV [AVT] going at only 20mph round the next corner. The result is an inevitable accident.'

120. A road safety group said:

'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.'

121. And another road safety group said:

'Generally speaking, the greatest safety hazard at present is the likeliness of road users overtaking and for there to be a head on collision as a result.'

122. A MoD/member of the armed services commented:

'It slows all other traffic down causing frustration resulting in risks being taken.'

123. 26 (8%) of respondents thought that the 20mph limit did not present a greater road hazard than the proposed higher limit. Reasons given included incidents at higher speeds are likely to be more severe, there is a shorter stopping distance at 20mph than 40mph and lower speed allows for more reaction time.

124. A road safety group said:

'.... AVTs will still be travelling at below posted limits, tailbacks will continue to occur and collisions at higher speeds are likely to be more severe.'

125. A former member of the armed services said:

'Low speeds always allow for quicker reaction and avoidance of accidents'

126. A road user- motorist said:

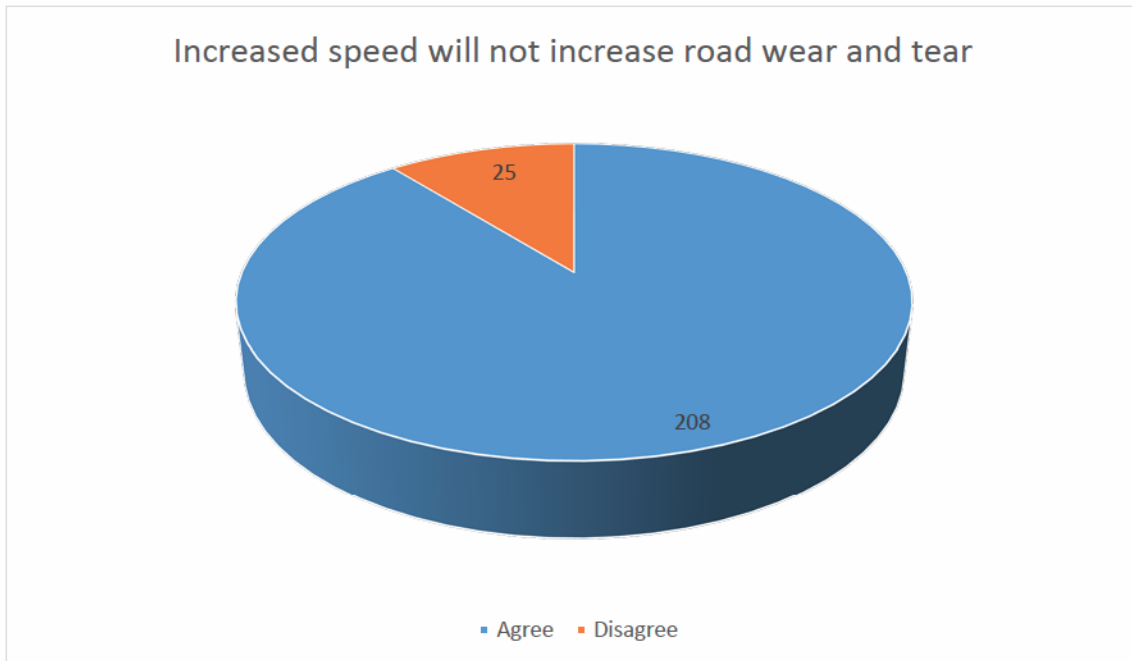
'.....a 70T vehicle travelling at 20mph has a smaller stopping distance than one travelling at 40mph.'

Government response

127. The Department has noted that a large majority of respondents (including two of the three road safety groups responding) think that the current 20mph limit for AVT represents a greater hazard to road users than the proposed higher limit.

Question 10: 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?

128. 233 responded to question 10, of which, 208 (89%) thought the Department's view that an increase in speed limit for AVTs to 40mph would not result in an appreciable increase in road wear and tear is correct.



129. Of those agreeing with the Departments view, 27 commented that road wear may even decrease at the proposed higher limit due to the friction effects between the tracks and the road surface being greater when turning at slower speeds.
130. Only 25 (11%) thought an increase in speed would result in more road wear. 12 of these gave a reason for their view but in a number of cases it was not clear whether the reason was in support of the Departments view or not, for example:

'I believe that 70 tonnes is the same weight and burden to the road whether it be 20 or 40 miles per hour.'

And

'All AFT's [AVT] now have rubber tracks, and due the overall leng[t]h of the track, the weight is distributed over a larger area. More damage is done by HGV (wheeled) due the majority of the weight been distributed through wheels.'

131. Six responses clearly disagreed with the Department's assessment that there would be no significant increase in road wear and tear as a result of the proposal.
132. A road user motorist said
- 'The [ke]rbstones are being regularly crimped already, higher speeds will mean even more damage.'*
133. A parish council commented:

'There will definitely be more wear and tear as the higher the speed limit the more vibrations it will cause to both roads and property. Also, there is a higher chance of the AVTs crashing into the street furniture.'

134. And a technical consultant said:

'How can it be correct? Travelling at 40 rather than 20mph doubles the track speed and also acceleration and deceleration as the pads contact and leave the ground. As energy is related to the square of speed, and one would presume energy is reasonably related to damage, it appears to be basic physics and dynamics.... '

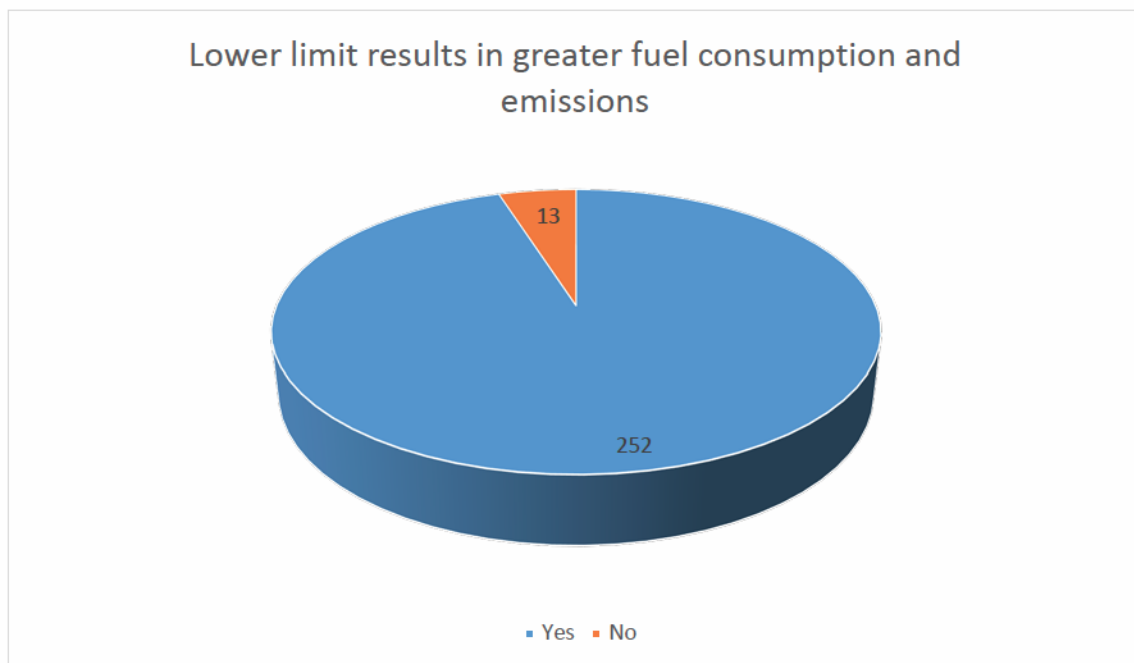
Government response

135. The Department notes the high level of agreement with the preliminary assessment that increasing the speed limit for AVT would not significantly increase wear and tear on public roads.

136. The Department also notes comments from the respondents disagreeing with this view. However, with the high level of support from consultation responses the Department sees no reasonable grounds for amending the initial assessment.

Question 11: 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?

137. 265 respondents replied to question 11 with 252 (95%) thinking the lower speed limit resulted in higher fuel consumption.



138. The main reason given for higher fuel consumption was that at 20mph AVT are restricted to using lower gears than at the proposed higher limit and therefore vehicle engines would make a

higher number of revolutions for road distance travelled than would be the case if able to use higher gears.

139. A road user - motorist said:

'A basic understanding of gearing and will tell you the revs will be higher thereby using more fuel. The vehicle's momentum is not being taken advantage of to reduce fuel consumption and emissions.'

140. The MoD estimate an increase in fuel consumption at ARMCEN (the training camp at Bovington, Dorset) of between 5% and 7% since AVT have been restricted to a 20mph limit. This equates to an estimated cost of between £17500 and £24500 per annum. A conservative central estimate of the saving for the remaining 6 key training areas is £22,951.

141. Linked with lower fuel consumption a small positive benefit from a reduction in emissions is expected. It would however be disproportionate to monetise this benefit.

142. 13 respondents answered 'No' to this question of which only one provided a comment:

'No, anyone who knows anything about vehicles know they have gearboxes and the rev range once at speed will be roughly the same regardless of speed due to the crew finding a happy medium with regards to noise and vibration within the AFV [AVT].... '

Government response

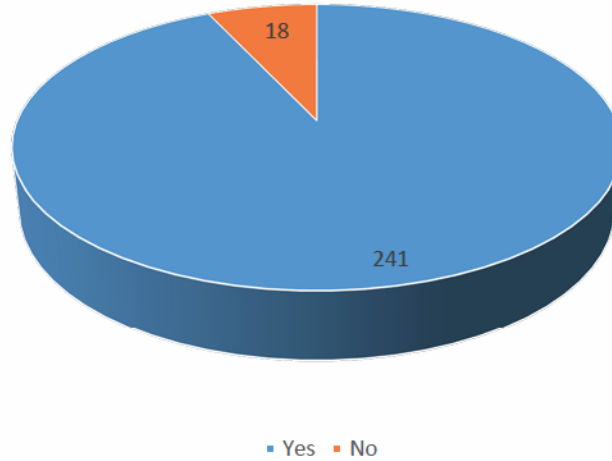
143. The Department notes the large majority opinion that fuel usage should be decreased as a consequence of the proposed higher speed limit.

144. The Department also notes the potential cost saving and reduced emissions expected as a result of the proposal.

Question 12: 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?

145. 241 (93%) of the 259 responding to question 12 thought the current 20mph speed limit resulted in greater vehicle component wear and tear than would be the case for the proposed higher limit.

Lower limit results in greater wear and tear to vehicle components



146. The main reasons given for increased component wear were more frequent gear changes, a greater number of engine revolutions for distance travelled and increased vibration at lower speeds.

147. A road user - motorist said:

'YES – greater wear and tear on gear box and final drives. (Am a farmer – so understand mechanical pressures on vehicles).'

148. A MoD/member of the armed services said:

'Yes because the full range of gears cannot be used causing stress on the lower gears which are not meant to be used in this way and engine wear due to higher rpm needed to maintain the lower speed.'

149. Only 5 of the 18 who did not think vehicle component wear and tear was greater at 20mph than it would be at the proposed higher limit provided further comment. There was no common reason given for this view.

150. A technical consultant commented:

'Speed has to be related to vehicle component wear, particularly with respect to track system parts.'

151. A MoD/member of the armed services said:

'AVTs, in principle, are likely to endure less wear and tear if driven slowly. However, this should not dictate the how to train the AVT driver.'

152. And another commented:

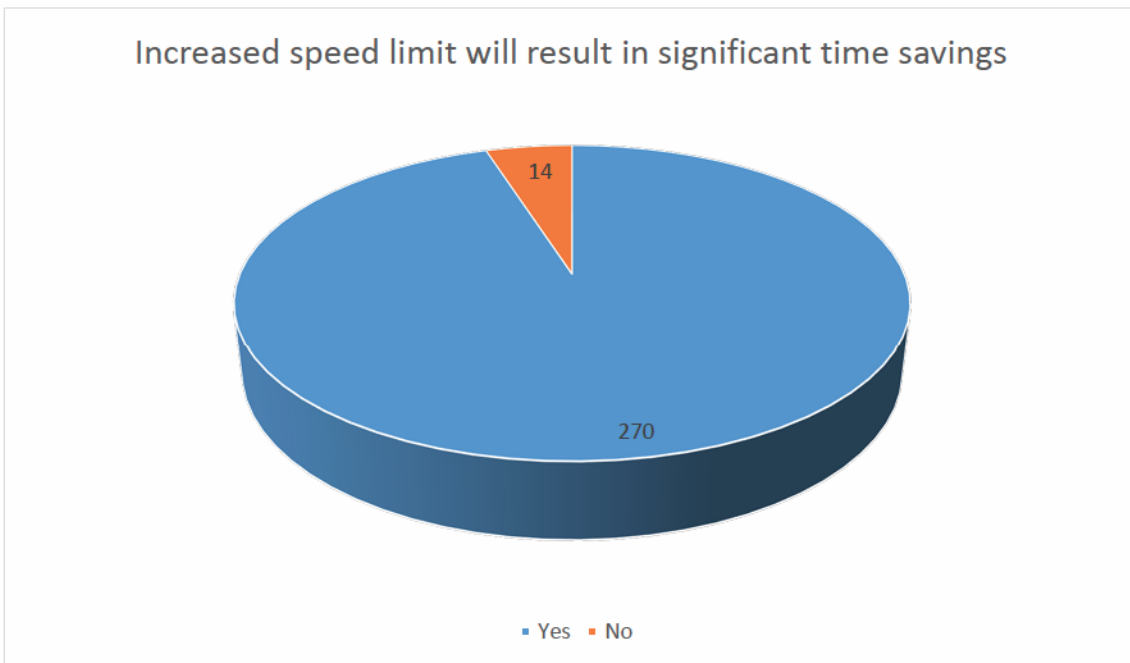
'Not always depends on the driving style'

Government response

153. The Department notes and agrees with the large majority view that the lower speed limit creates greater vehicle component wear and tear than would be the case for the proposed higher limit.
154. Due to the short time period that AVT have so far been restricted to 20mph, there is not sufficient data available to confirm this.

Question 13: Do you think an increase in speed limit would provide significant time savings for AVT driver training and transit to and from training areas?

155. 270 (95%) of the 284 responding to question 13 thought the proposed higher speed limit would deliver significant time savings to the MoD when training and transiting between barracks and training areas.



156. Most respondents who thought there would be significant time savings as a result of the proposed higher limit also thought the reason would be self-evident with potentially faster transit times between barracks and training grounds, less time taken for driver testing and less time taken in accumulating road training miles.
157. MoD estimate a time saving of 40 minutes for every AVT driver trained and that at least one additional driving test per day would be possible at the higher speed limit resulting in an estimated £10,979 saving per year at ARMCEN (Data for other training camps is not available).
158. 14 respondents thought a higher speed limit would not result in significant time savings of whom 8 provided additional comment.
159. Of these, three thought there would be time savings but thought it would be marginal rather than significant and two commented that

AVT rarely travelled significant distances by road to and from training areas.

Government response

160. The Department notes the large majority view that the proposed increase in speed limit will result in significant time saving for training vehicle crews and when transiting to and from training areas. Information provided by the MoD supports this view and has been used to inform the impact assessment to accompany this response.

Question 14: Approximately 58,000 training miles are driven in and around ARMEN (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?

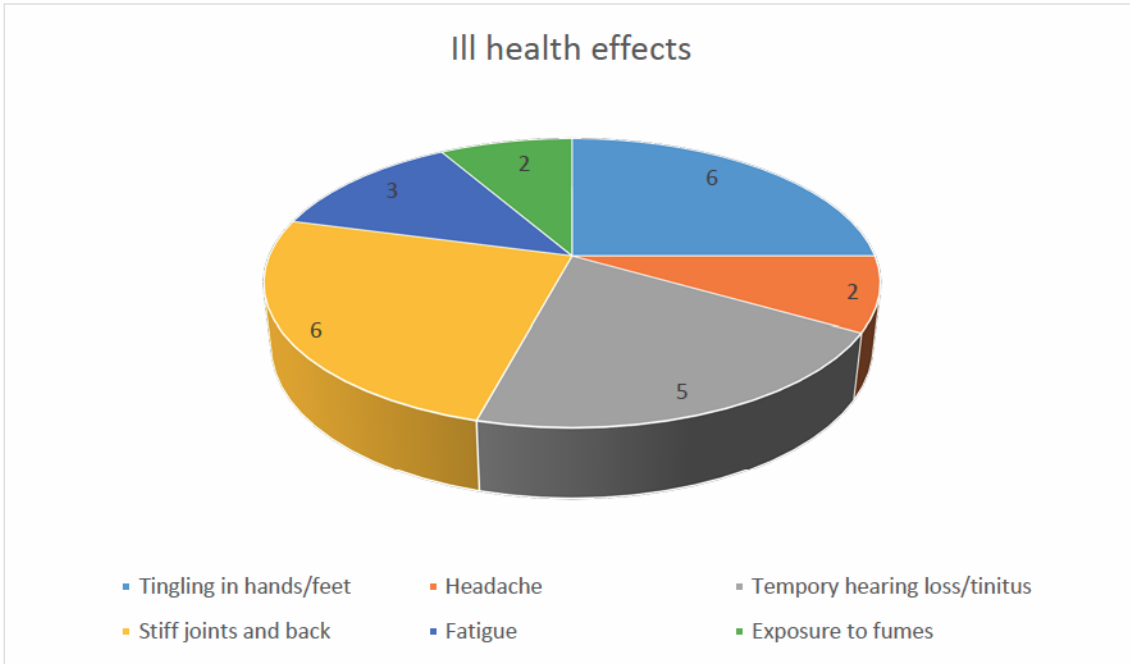
161. Only seven respondents answered that they could provide data of whom only five offered further comment.
162. There was no actual data on AVT miles travelled on public roads in England and Wales submitted by consultation respondents. Two respondents said that it would be possible to provide data for England and Wales with one questioning the value to do so as annual mileage totals fluctuate significantly.

Government response

163. The Department would like to thank those who responded that they may be able to provide data. However, as the primary reason for an increase in speed limit for AVT is an operational need, the Department consider it would be disproportionate to pursue further data in addition to that already provided by the MoD.

Question 15: Do you have any experience of ill health effects after operating AVT at 20mph?

164. 247 responded to question 15 of which 42 (17%) reported ill health effects following operating AVT at the 20mph limit.
165. Most respondents thought the ill-health effects were related to increased vehicle vibrations associated with travelling in low gears and two mentioned increased exposure to fumes within the vehicle.
166. The most common symptoms reported was tingling in hands and feet (6), stiffness to joints and back (6) and temporary impairment to hearing/tinnitus (5).



Government response

167. The Department notes that 17% of those responding 'Yes' or 'No' to this question reported ill health effects that they attributed to travelling in AVT for prolonged periods. The MoD have introduced mitigating measures to reduce this effect such as alternating periods of off road and on road training. However it believed that the proposed increase in speed limit will further alleviate this problem.

Question 16: Do you think there are any other impacts of the proposed increase in speed limit for AVT not listed in this document?

168. 47 (16%) of the 302 responding to this question thought there were impacts of the proposed speed limit increase not included in the consultation document of which 44 provided further comment.

169. However of these only 18 were actually citing impacts that were not already referred to:

170. Six respondents mentioned noise levels both for vehicle occupants and the general public. Of these four thought that noise level would increase at higher speeds while two thought they would decrease.

171. The reason given an increase in noise levels was that faster travelling vehicles and the increased track speed at the higher speed limit would generally create more noise.

172. A technical consultant commented:

'Noise. Concerning the tracks, this will increase in some relation to impact energy. Doubling speed will quadruple energy, thus noise will increase. I can't put a figure on how much.'

173. A road user motorist in the Wiltshire/Hampshire area commented:
'Noise, however not a big issue given the location of driver training areas.'

174. And a road safety group commented:
'There may be increases in noise as a result of AVTs accelerating to and travelling at increased speeds. When travelling through residential areas this could have a negative impact on local communities.'

175. Reasons given for a decrease in noise levels were that engine revolutions would be lower as the vehicle would be in higher gears at the proposed higher limit, vehicle vibration and therefore the associated noise would be reduced, and the length of exposure of the general public to vehicle noise would be reduced as vehicles would pass more quickly.

A road user - motorist said:

'Higher AVT road speed produces less engine and transmission noise.'

And a MoD/member of armed services commented:

'Higher revving engines and taking longer passing built up areas can cause distress to local communities.'

176. Four mentioned a detrimental effect of the 20mph limit to the public perception of the armed forces.

177. An AVT driving and maintenance instructor commented:
'At ARMCCEN, due to its location, the MOD and its equipment are very much in the public eye both nationally and internationally. It is a shame that an outdated and ill-conceived law prevents us from showing ourselves off and instead invites ridicule and abuse. To increase the speed limit is to increase our standing and improve our public profile.'

178. Three said that the 20mph limit had a detrimental effect on AVT crew morale.

179. A MoD/member of the armed services said:
'..... An unrealistically low speed limit is bad for morale. I have had to do it and the sheer waste of time is utterly frustrating when you know that the vehicle can quite safely travel faster and within its design parameters.'

180. Two thought that traffic incidents involving AVT may increase in the short term if other road users not aware of the higher speed limit for AVTs.

181. One thought the 20mph limit had a negative effect on tourism:
'Dorset has many local attractions. Visitors have a major impact on local economy and local infrastructure and business. Drivers and people visiting the South Coast may not be conversant with the size the driving characteristics of AVT's especially moving so slowly,

compounded to the road design the progress to move very slowly geographically to the various attractions may affect them on re visiting the area.... '

182. One respondent, a force development and capability manager for combat forces, thought the 20mph limit creates an inequality in the level of competence between tracked vehicle crews and wheeled vehicle crews.

'The inability to train wheeled and tracked vehicle crews to the same standard presents a risks to the development of a coherent balanced force. This should be avoided at all costs.'

183. One respondent commented that civilian owners of armoured tracked vehicles might think the speed increase applied to them also and that some clarification would be needed, perhaps via the Highway Code.

Whilst I understand this policy change relates to the MOD only, I do feel that there is not enough information/clarity/policing that this does not apply to privately owned ex-military tracked vehicles, that will/do equally think they can drive their vehicles at the same speed. In a readily available published document - The Highway Code, there is no reference to tracked vehicles at allusers of AVT's have the onus to ensure they are used correctly, surely non-users would still need to know about them should they come across them on the public highway, surely they should be able to find that information in 'The Highway Code'.

Government response

184. The Department would like to thank respondents and has noted the suggested additional impacts.