

Consultation by the Department for Transport on 'Examining the Speed Limit for HGVs over 7.5 tonnes on Single Carriageway Roads' November 2012

A Response by the English National Park Authorities Association

1. The English National Park Authorities Association (ENPAA) is the representative body for the English National Park Authorities plus the Broads Authority. We are grateful for the opportunity afforded by the Department for Transport to comment on possible changes to the Speed Limit for HGVs of 7.5 tonnes or over on single carriageway roads.
2. English National Park Authorities are not Highway Authorities and therefore do not have responsibility for either highway maintenance or road safety. However, many strategic routes that are heavily used by HGV traffic cross National Parks. Therefore we think that it is appropriate for ENPAA to comment on this consultation. As ENPAA and National Park Authorities are not directly involved with either highways or freight transportation this consultation response focuses on the potential impact on National Parks and the purposes and duty of National Parks¹. Therefore the response is comprised of themed comments rather than answers to the questions posed within the consultation document.

General

3. We recognise that in the current financial climate there is pressure on the Department to bring in measures that enhance economic growth. However, the consultation document is quite clear in recognising that some of the impacts of any increase in speed limits, particularly in relation to road safety are not known. We feel that a more measured approach would have been to gather empirical evidence in support of the proposals ahead of this consultation.
4. There also appears to be an assumption in favor of an increase in HGV speed limits within the consultation document. Whilst in paragraph 4 of Page 5, an assurance is given that the consultation is open with no preferred option, it is of some concern that the Policy Option questions relate only to increasing the speed limit, and that none relate to maintaining the limit at its current level.

Road Safety

5. One of our key concerns relates to road safety and the potential impact of raising the speed limit from the current 40mph to 50mph. Paragraph 3 on page 5 acknowledges that 70% of HGVs currently travel at greater than 40mph. It is unrealistic to assume that if the speed limit for HGVs is raised to 50mph that this will automatically be adhered to by all those vehicles that already abuse the speed limit. Whilst it is perhaps unlikely that all 70% of HGV drivers who currently break the 40mph limit will also break a 50mph one; if the HGV drivers follow a similar pattern to that of LGV drivers, it is probable that almost one third will². In addition to road safety, this also has implications for the assumptions on highway maintenance made in paragraph 9, page 6.
6. Whilst an increase in speed limits may reduce some of the dangerous overtaking manoeuvres resulting from platooning, it is likely to lead to those collisions that occur taking place at speeds in excess of 50mph. In addition there are many villages and hamlets in

¹ Sections 61 and 62 of the Environment Act 1995 <http://www.legislation.gov.uk/ukpga/1995/25/part/III>

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

National Parks where there is already concern with regard to speeding HGVs. This is a particular issue in locations where a main road has a short section of road with a lower speed limit. In these locations the tendency is for vehicles to lose very little if any speed whilst passing through the village; any increase in the speed limit may exacerbate this issue. It is also likely that where unusual queues of standing or slow moving traffic are obstructed by the terrain, such as for specific events or as a result of agricultural vehicles / movement of livestock, that the increased closing speed of HGVs may result in more accidents with stationary or slow moving vehicles.

7. Most National Parks carry a mix of traffic comprising resident, visitor and cross-Park or business traffic. This differing mix of traffic means that there are several different perceptions of the appropriate speed for most roads, and can lead to conflict between user types. An increase in speed limits for HGVs is likely to further increase conflict with an associated increase in risk of accidents.

8. There would also be potential impacts for other vulnerable road users, notably cyclists, horse riders and pedestrians. National Parks are key destinations for cyclists on-road as well as off-road. Similarly many rights of way either cross or parallel main roads either on pavement or multi-user trails. The impact of raised speed limits on the safety of vulnerable users is two-fold, both actual and perceived. At a time when for both improving health and reducing carbon, the public are being asked to partake in more active travel, anything that impacts on safety or the perception of safety is likely to act as a deterrent.

Diverting Traffic

9. Some National Parks have roads passing through or adjacent to them that form part of the Highways Agency's Strategic Road Network of motorways and trunk roads. It is generally recognised that these routes should carry the majority of vehicles making medium to long distance journeys between cities and regions. However in some National Parks there are alternative local routes that whilst they are not part of the strategic road network, often offer shorter distances for travel. The Strategic Road Network currently offers the advantage of speed over these shorter routes. However, an increase in speed limits for HGVs may well make the local roads a more attractive proposition to HGV drivers and redirect them from the more appropriate Strategic Road Network onto the local road network. This will obviously have both safety impacts, as alluded to above, but also wider environmental impacts. These wider environmental impacts include air quality, visual intrusion, and the impact of vibration and vehicle emissions on cultural heritage where the routes pass through villages and hamlets. There is also the likelihood that any such measures will lead to an increase in the number of birds and animals being killed on the roads by HGV traffic.

10. Both the individual National Park Authorities and ENPAA generally seek to encourage visitors and residents to use sustainable forms of transport to travel to and around the National Parks, and to reduce journeys made by private car in order to reduce carbon emissions and associated environmental impacts. Therefore, where possible, the transfer of road freight to rail would be preferred over any measures that might make cross-Park routes more attractive to through HGV traffic.

Tranquillity

11. The impact on tranquillity as a result of excessive traffic noise and speed and increasing volumes of traffic is a key issue for all of the National Parks, as it has a negative impact on the quality of experience for visitors, residents and other users of the National Parks. The loss of tranquillity is something that features specifically in the strategic priorities for transport in both Northumberland National Park Authority and the North York Moors National Park Authority. Therefore the ENPAA would be unsupportive of proposals that are likely to result in more traffic noise and further undermine tranquillity.

Highway Infrastructure

12. A further concern is the implications for highway design, infrastructure and signage. This is particularly important within National Parks, where we seek to keep road signage and infrastructure to a minimum. Many of the National Park Authorities, including the Peak District and the North York Moors, are seeking the agreement of specific standards for road signs and highways infrastructure, or 'design codes', within the National Parks to encourage less signage. Therefore the potential increase in signage to support a change in speed limits would be of concern to us. There is potential for the measure to influence the 'design speed' for the road, which is used to determine how big road signs need to be, and also the extent to which bends are 'ironed out', leading to other knock on implications. This could result in changes in rural road character, for example as a result of more robust traffic management requirements and physical changes in road layout.

Demonstration of Benefits

13. The consultation document makes reference to a number of benefits that would result from increasing the speed limit for HGVs. These include a reduction in unnecessary costs to vehicle operators, congestion, avoidable overtaking collisions and the creation of a more even playing field for operators. The report also claims that raising the HGV speed limits on single carriageway roads will reduce frustration for the many drivers stuck behind slower-moving HGVs on busy roads unable to overtake. We believe that the consultation document does not adequately demonstrate these benefits. In order to better demonstrate any potential benefits, we would welcome the following studies: -

1. Cost

We would welcome a modelling exercise to provide evidence of costs, for example considering the impact on productivity due to longer journeys and also the influence of lower speeds, which for example could lead to lower strains on the engine and parts and give longer life and thus reduced costs for maintenance and fuel bills.

2. Overtaking collisions

The slower speeds of the HGVs may help to reduce the number and severity of collisions. Consistently research has shown that higher speeds are a factor in increased numbers of collisions, and increasing speeds leads to a higher severity for those involved. The cost of increased collisions would therefore be saved as well as the human cost, which should be born in mind when comparisons of potential costs to the industry are calculated.

3. Business impacts

We would welcome further information regarding what consideration has been given to different options for the industry, for example, considering an alternative to larger vehicles transporting goods around single carriageway roads, such as smaller distribution centres scattered more widely, leading to increased opportunities to support the local economy, with locally employed drivers and support staff in smaller vehicles providing a quicker more effective service.

ENPAA

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