



Planning, Transport  
& Leisure Services

**Gibson Building, Gibson Drive  
Kings Hill, West Malling  
Kent ME19 4LZ**

Switchboard 01732 844522  
DX TMBC 92865 West Malling  
Minicom 01732 874958 (text only)  
Web Site <http://www.tmbc.gov.uk>  
Email [transport.services@tmbc.gov.uk](mailto:transport.services@tmbc.gov.uk)

Vehicle Speed Limits  
Department for Transport  
3/23  
33 Horseferry Road  
LONDON SW1P 4DR

**Contact Mike O'Brien**  
**Direct line 01732 876288**  
**Email [mike.obrien@tmbc.gov.uk](mailto:mike.obrien@tmbc.gov.uk)**  
Fax 01732 876317  
Your ref  
Our ref PTLs/MOB/T1  
Date 31 January 2013

Dear Sir

### **Examining the Speed Limit for HGVs over 7.5 tonnes on Single Carriageway Roads: A Consultation Document**

Tonbridge and Malling Borough Council welcomes the opportunity to comment on the Government's consultation examining the speed limit for HGVs over 7.5 tonnes on single carriageway roads.

We support the Government's commitment to improving the conditions for economic growth and understand the freight and logistics sector's concerns about ensuring quicker journeys and lowering costs. However we do have concerns with the options to any general increase the speed limit for HGVs over 7.5 tonnes on single carriageway roads due to road safety and environmental implications. We believe these concerns outweigh the case for increasing the speed limit and therefore oppose an indiscriminate increase of the speed limit to either 45mph or 50mph and believe that it should remain at 40mph within many rural communities.

There are a number of roads subject to the national speed limits connecting the rural communities across our borough. Although the number of vehicles over 7.5 tonnes using these roads may be fairly limited, speed is a regular problem. A large number of our residents enjoy walking, horse riding and cycling, and any threat to these healthy activities caused by speeding vehicles, especially large ones, would be detrimental to the quality of life in the community both from a safety and environmental viewpoint. The real problem is that so few larger vehicles actually obey the current 40mph limit in practice and we would call upon enforcement authorities, freight organisations and businesses to correct this dangerous and inappropriate trend.

Increasing the speed limit for large vehicles is likely to cause an increase, rather than a decrease, in accidents. Inevitably accidents involving heavy vehicles cause more severe accidents than lighter vehicles, with their weight being a contributory factor. The police regularly cite excess speed as the major cause of road accidents and to increase

and legitimise inappropriate speeds indiscriminately would simply increase this risk, particularly on many minor roads across the Borough.

Any rise in average speeds by large vehicles would inevitably increase both their fuel consumption, and their emissions of CO<sub>2</sub> and particulates. It would also increase noise levels, but perhaps most importantly at a time of local government spending constraints, it would substantially increase the damage caused to rural roads by heavy vehicles. An increase in road maintenance budgets on rural roads (that were never designed to carry very heavy vehicles at high speeds) could be expected were vehicle speeds to increase.

DfT's own statistics show that around 70% of HGVs travel over 40mph already, in excess of the maximum speed limit. Increasing the speed limit will not provide a level playing field for the logistics sector, as those that drive above the speed limit will invariably continue to do so unless law enforcement is more rigorously enforced. The result of increasing the speed limit will be that the current average free-flow speed of 45mph, will rise to 50mph or 55 mph depending on the 2 options, but the freight and logistics sector will still be faced with an unlevel playing field.

As identified in the consultation document, there is also a risk that increasing the speed limit on single carriageway roads could increase HGV traffic from dual carriageways onto these roads as they look for short cuts to reduce their travelling time.

Local communities are very conscious of the impact of traffic movements, particularly of HGVs, on air quality and noise levels. We are therefore concerned to see that the modelling results indicate that there would be a cost to society as a whole in the form of environmental impacts, including on local air quality impacts through increases in NO<sub>x</sub> and PM<sub>10</sub> and noise. This in turn then raises compliance issues for local authorities with respect to local air quality limits.

The research into the effects of increasing the national speed limit for HGVs over 7.5 tonnes has not been able to show that the human and financial costs of doing so would not outweigh the financial benefits. Therefore, the costs of the current limit of 40 mph should not be described as "unnecessary", but as the price of preventing increased road accidents and casualties and defending the environmental quality of our towns and rural areas.

It is far from certain that increasing the speed limit for HGVs over 7.5 tonnes would reduce the level of unsafe overtaking by other drivers, or whether it would reduce or increase the number or severity of accidents or casualties caused by unsafe overtaking.

In summary, there is insufficient evidence to justify a general increase of the speed limit for HGVs over 7.5 tonnes to 45 or 50 mph on single carriageway roads. More evidence is needed of both the benefits (e.g. whether faster HGVs would mean fewer overtaking accidents) and costs of increasing the speed limit as described.

If the national speed limit for HGVs over 7.5 tonnes on single carriageways were to increase local Highway Authorities would need to carefully assess the potential for increased road safety risks of a higher national speed limit for HGVs over 7.5 tonnes on single carriageway roads, and introduce appropriate local speed limits within the powers they have under "Setting Local Speed Limits, DfT Circular 1/06".

This will be reported to the Councils Planning and Transportation Advisory Board on 12 March and I will forward any further comments made by Members of the Council.

Yours sincerely

**Mike O'Brien**  
Chief Engineer