

Submitted on 2012-11-17 18:08:29.591291

1 What is your name?

Name:

Keith Peat

2 What is your email address?

Email:

kspeat@talktalk.net

3 What is your organisation?

Organisation:

Drivers Union

4 Policy option 1: Raise the national speed limit for HGVs over 7.5t from 40 to 50 mph on single carriageway roads. Is this your preferred policy option? Please explain your answer.

q1:

There needs to be a raise to at least 50 for there to be any relief worth considering.

I study speed limiting and speed limit orders and am an ex police accident and driving expert.

My philosophy is simple and inarguable. 1) Reduce the need to overtake, reduces attempts to overtake & ergo reduces the multi casualty overtake accidents.

Officials of the DfT, in denying that, always wrongly turn to blame for an accident instead of addressing the causes of them. This policy will undoubtedly address A major accident cause.

This is exacerbated by poor speed limiting where a 50 limit is between two 40 limits; so after tailing an HGV in a 40 zone drivers are eager to pass it, with a mere 10 MPH overtake excess speed in the 50 stretch where they oppose drivers doing exactly the same thing from the opposite direction. Stats are never kept to confirm that such limiting causes accidents but policy should not rely on stats to deny the obvious in road safety.

But also your paper only assumes accidents at the scene of the HGV. No account is taken of knock on accidents later in the day at another location simply from making up lost time, tiredness, stress & anxiousness accrued from many such rolling speed limiters during one day. Again no stats are gathered to ascertain if any local policy elsewhere and earlier on contributed to an accident. They do but are never taken into account.

2)What is the cost of speed limiting and is it a false economy?

Any road safety policy that kills more than it saves is poor policy. Slowing UKs Road Traffic averages out at £3,000,000,000 per 1 MPH per annum. An increase of average speeds by 10 MPH would save £30,000,000,000 a year with added business efficiency. How many lives could be saved with this sort of money in the NHS, A&E, Police, Fire & Ambulance services? Road safety must bring cost benefit to the community in terms of life and well being. The current policy fails to do that.

5 Policy option 2: Raise the national speed limit for HGVs over 7.5t from 40 to 45 mph on single carriageway roads. Is this your preferred policy option? Please explain your answer.

q2:

6 Do you consider there to be any additional policy options, or variants of policy options 1 and 2? If so, please explain fully and provide any evidence you may have. For example, only increasing the speed limit for HGVs over 7.5t on single carriageways where the national speed limit applies, and retaining the 40 mph limit at other times

q3:

I would recommend NSL for HGVs where it is NSL limited but at least 50MPH where the limits allow. There is not much point in accepting an HGV is manageable at 50MPH only in one type of limit but not in another. Either they are to be limited to 50 MPH where the limit is at least that or free to select appropriate speeds at all limits as for smaller vehicles.

I think that the 50 MPH limit is a very reasonable option that will bring great benefit.

7 In your opinion does the current 40 mph speed limit cause any of the following: unnecessary costs to vehicle operators; congestion; avoidable overtaking collisions; an uneven playing field for businesses; or anything not mentioned in this list? Please explain your answer and provide any evidence you may have.

q4:

Yes. As in answer 4.

I study speed limiting and speed limit orders and am an ex police accident and driving expert. My CV is my evidence as well as the self evident.

My philosophy is simple and inarguable. 1) Reduce the need to overtake, reduces attempts to overtake & ergo reduces the multi casualty overtake accidents.

Officials of the DfT, in denying that, always wrongly turn to blame for an accident instead of addressing the causes of them. This policy will undoubtedly address A major accident cause.

This is exacerbated by poor speed limiting where a 50 limit is between two 40 limits; so after tailing an HGV in a 40 zone drivers are eager to pass it, with a mere 10 MPH overtake excess speed in the 50 stretch where they oppose drivers doing exactly the same thing from the opposite direction. Stats are never kept to confirm that such limiting causes accidents but policy should not rely on stats to deny the obvious in road safety.

But also your paper only assumes accidents at the scene of the HGV. No account is taken of knock on accidents later in the day at another location simply from making up lost time, tiredness, stress & anxiousness accrued from many such rolling speed limiters during one day. Again no stats are gathered to ascertain if any local policy elsewhere and earlier on contributed to an accident. They do but are never taken into account.

2) What is the cost of speed limiting and is it a false economy?

Any road safety policy that kills more than it saves is poor policy. Slowing UKs Road Traffic averages out at £3,000,000,000 per 1 MPH per annum. An increase of average speeds by 10 MPH would save £30,000,000,000 a year with added business efficiency. How many lives could be saved with this sort of money in the NHS, A&E, Police, Fire & Ambulance services? Road safety must bring cost benefit to the community in terms of life and well being. The current policy fails to do that.

8 We welcome views from HGV operators and trade associations about whether they feel the balance of savings and costs of extra speed detailed in the Impact Assessment reflects their own experience or expectations?

q5:

Yes. There can be no question that current policy is costing the economy billions and is mostly based on an ideological outlook as well as a mass of vested interest and profit from the speed limiting industry.

9 If the speed limit for HGVs over 7.5t is not raised on these roads, collisions as a result of 'platooning' could continue. If it is, the frequency of collisions could decrease due to a reduction in 'platooning', though on the other hand the severity of collisions could increase.

q6:

Not so. There would be less collisions but any that do occur will not be faster and thus cannot be more severe. Why would overtakes be faster which is the only way they would be more severe?

10 Do you have any opinion or evidence on the effect of 'platooning' on road safety, or on the frequency or severity of collisions involving HGVs on single carriageway roads and what effect an increase in their maximum speed limit on these roads would have on safety? If so, please provide it in response here.

q6a:

Please see my full CV at www.youdrive.co I repeat the evidence I have already given on this as an expert:

My philosophy is simple and inarguable. 1) Reduce the need to overtake, reduces attempts to overtake & ergo reduces the multi casualty overtake accidents.

Officials of the DfT, in denying that, always wrongly turn to blame for an accident instead of addressing the causes of them. This policy will undoubtedly address A major accident cause.

This is exacerbated by poor speed limiting where a 50 limit is between two 40 limits; so after tailing an HGV in a 40 zone drivers are eager to pass it, with a mere 10 MPH overtake excess speed in the 50 stretch where they oppose drivers doing exactly the same thing from the opposite direction. Stats are never kept to confirm that such limiting causes accidents but policy should not rely on stats to deny the obvious in road safety.

But also your paper only assumes accidents at the scene of the HGV. No account is taken of knock on accidents later in the day at another location simply from making up lost time, tiredness, stress & anxiousness accrued from many such rolling speed limiters during one day. Again no stats are gathered to ascertain if any local policy elsewhere and earlier on contributed to an accident. They do but are never taken into account.

11 Do you have any opinion or evidence on what effect an increase in the maximum speed limit for HGVs over 7.5t on these roads would have on non- HGV vehicle speeds such as car speeds?

q7:

Yes. They will increase accordingly and are part of the £3,000,000,000 per 1 MPH cost per annum average saving.

A queue is formed only because every following driver, no matter how pedestrian or incapable of overtaking, was going, wanted to go and demonstrably able to

go faster; otherwise they could never have caught up with the lead vehicle.

In effect the 40 Limiters are imposing severe speed restrictions on many other drivers who can, and did previously go faster within the limits and more importantly their own.

What has to be born in mind is that these limiters are causing HGV drivers to ignore their tailbacks and impose their limits on others. In doing so, they commit the more serious offence of driving without due care Sec. 3 RTA.

12 The Department invites information on where there are single carriageway roads which are subject to the national speed limit, or are signed at 50 mph, in areas where there are air quality problems.

q8:

13 What impacts, if any, do you think there will be to the following if an increased speed limit for HGVs over 7.5t on single carriageway roads is introduced? a) Air Quality Management Areas (AQMAs). Local authorities may have specific evidence on the effect on AQMAs in their authority; b) EU air quality standards [1] ; c) Noise levels; d) Areas currently identified as noise hotspots [2]

q9:

This is not my expertise however I do suggest the economic benefits of road transport already covered have contributed to a longer life expectancy, better health and quality of life something never counted by the ecologists or environmentalists. This proposal will make more money available for even more health care.

14 If as a result of either of the policy options being implemented there was a reduction in 'platooning' do you think there would be a significant impact on: a) Noise b) Air quality

q11:

No

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

q15:

This is not my field. But if we are saving lives by a sounder road safety policy and economically too, then that must take precedence over vague issues. Especially those with an ideological green agenda base.

16 Do you think that all of the potential health and social costs of the policy options have been considered in the Impact Assessment? Please provide details if you think costs have not been included.

q12:

I do not think the economic costs of current policy, as I have outlined, have been included and in addition, prosecution costs, accident costs, State Benefits for drivers who lose their licences and their jobs etc. Have they?

17 Do you believe an increase in speed for this class of vehicle on these roads will cause more HGVs over 7.5t to use single carriageway roads, which do not currently?

q13:

I do not know. They will weigh the advantages of routes as always. We do know there will not be less using the route so the likelihood is more.

18 Do you think some freight may switch from rail or water to HGVs, if the speed limit is increased on these roads for these vehicles?

q14:

Possibly. It certainly will not encourage more freight to these.

19 Do you think that there may be added wear and tear on these roads if the speed limit is increased for these vehicles? Local authorities may have specific comments or evidence, with regard to roads in their authority.

q15:

This is not my field.

20 Local authorities have powers to alter speed limits on the local road network, including non-trunk primary routes, in line with guidance set out in Setting Local Speed Limits, DfT Circular 1/06.[5] Do you think that the increase in the national speed limit for HGVs over 7.5t on single carriageways, would make it more likely that local authorities would introduce more local speed restrictions, and if so on which roads?

q16:

Yes. 'A' trunk roads.

21 If you are an organisation that provides information and you believe that an increased speed for this class of vehicle on single carriageways would incur costs for your organisation in the form of publicity or conversion costs please indicate what these may be. Also please advise whether these costs would be reduced given a lead-in time between announcement and policy implementation as a result of costs being rolled into existing plans.

q17:

N/A