



**Community
Transport
Association**

Draft Response to the Department for Transport

Consultation on Heavy Goods Vehicles & Passenger Carrying Vehicle motorway speed limits

Closing Date: 27 April 2010

The Community Transport Association UK

DRAFT RESPONSE

The CTA is a national charity giving voice and providing leadership, learning and enterprise support to member organisations, which are delivering innovative transport solutions to achieve social change. The CTA promotes excellence through providing training, publications, advice and information on voluntary, accessible and community transport.

Voluntary and community transport exists to meet the travel and social needs of people to whom these would otherwise be denied, providing accessible and affordable transport to achieve social inclusion.

The CTA is the representative body for third sector passenger transport operators in the UK. The CTA 's member organisations are involved in the provision of transport, especially accessible services.

The CTA is the UK's largest provider of training, advice and information on accessible, voluntary and community transport provision. The CTA is part - funded by the Department for Transport, the Welsh Assembly Government, the Scottish Government and the Department for Regional Development (Northern Ireland).

CTA's Response to Consultation

The CTA welcomes the opportunity to contribute to Department for Transport's consultation process. After reading through the consultation we have decided to respond on those specific areas that we believe would have a marked effect on our sector.

Contact Details

Any queries regarding this response should be directed to:

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DRAFT RESPONSE

Q1: Do you agree that we should reduce the speed limit from 70mph to 60mph for HGVs not exceeding 7.5 tonnes (under item 5(1), column 3(a) of Schedule 6 to the Road Traffic Regulations Act 1984) – and, if not, why not?

Although HGVs not exceeding 7.5 tonnes are not common within the community transport sector the CTA supports the thought process to reduce the speed limit to 60mph. The rationale behind this is the projected reduction in accidents and related accident costs and also the reduction in fuel consumption, which will benefit the operators, and CO2 emissions.

Q2: Do you agree that we should reduce the speed limit from 70mph to 65mph for PCVs not exceeding 12 metres, etc. (under item 1(i), column 3(a) of Schedule 6 to the Road Traffic Regulations Act 1984) – and, if not, why not?

The CTA supports the reduction in speed limits for PCVs not exceeding 12 metres. In doing so the CTA accepts that there will be increased costs due to slightly longer journey times but these costs will be outweighed by a reduction in fuel consumption which will be of greater benefit to operators.

The CTA believes that when reducing the speed limit on motorways for PCVs not exceeding 12 metres, then it would also be logical to further reduce the limit by 5mph to 60 mph to reflect the other UK speed limits that increment every 10mph. This would help in general compliance with speed limits by making it easier for drivers to remember what speed they should be travelling at. Because 60 mph is the speed limit for PCVs not exceeding 12 metres when travelling on dual carriageways, we therefore suggest that treating motorways like dual carriageways would be a sensible and pragmatic approach.

Reducing the speed limit to 60mph places responsibility on all drivers of this size of vehicle to ensure that they drive responsibly and keep to the speed limit rather than just relying on the speed limiter in the increasing number of cases where one is fitted to the vehicle.

The CTA also believes that reducing the speed limits for these vehicles will reduce the disparity between speed limited and non-speed limited vehicles and the enforcement of speed limits on motorways. It will also reduce any driver confusion as to what speed can be used in the case where they drive for an operator who has a mixed fleet of speed limited and non-speed-limited vehicles.

Q3: Do you agree that we should increase the speed limit from 60mph to 65mph for PCVs exceeding 12 metres, etc. (under item 1(ii), column 3(a) of Schedule 6 to the Road Traffic Regulations Act 1984) – and, if not, why not?

Although PCVs exceeding 12 metres are not currently common within the community transport sector we can see that recent changes made by the Local Transport Act 2008 may change this in the future.

DRAFT RESPONSE

The CTA believes that when reducing the speed limit on motorways for these vehicles, it would be logical to further reduce the limit to 60 mph to reflect the other UK speed limits that increment every 10mph. We believe this will also help in achieving compliance of speed limits and making it easier for motorists to remember what speed they should be travelling at. As 60 mph is the speed limit for this type of vehicle when travelling on dual carriageways, we think it is easy to remember to treat the motorway like a dual carriageway and travel at 60mph.

Reducing the speed limit to 60mph places responsibility on all drivers of this size of vehicle to ensure that they drive responsibly and keep to the speed limit rather than just relying on the speed limiter in the increasing number of cases where one is fitted to the vehicle.

We also believe that reducing the speed limits for these vehicles will reduce the disparity between speed limited and non-speed limited vehicles and the enforcement of speed limits on motorways. It will also reduce any driver confusion as to what speed can be used in the case where they drive for an operator who has a mixed fleet of speed limited and non-speed-limited vehicles.

Q4: Do you agree with the draft Impact Assessment (at page13) - and/or can you help us to quantify more precisely the estimated costs and benefits?

The CTA agrees with the proposals to implement all options B, D and C because the economic and environmental benefits are appealing and, in the community transport sector, the cost-burden per passenger would be minimal.

Q5: Do you consider that the proposed changes would have any other unintended implications which we have not considered in this consultation document and Impact Assessment – and, if so, please identify what these implications may be and try to place a quantified value on them.

None.