



Department for Transport

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

Response of The British Horse Society

The British Horse Society

1. The British Horse Society (BHS) represents the interests of the 3.4 million people in the UK who ride or who drive horse-drawn vehicles. With the membership of its Affiliated Riding Clubs and Bridleway Groups, the BHS is the largest and most influential equestrian charity in the UK. The BHS is committed to promoting the interests of all equestrians and the welfare of horses and ponies through education and training.
2. The equine industry is estimated to be worth £7 billion to the UK economy and to employ 220,000 – 270,000 people.
3. 90% of riders are female¹. 25% of riders are aged under 16 years and 48% are aged under 24 years.²
4. The Strategy for the Horse Industry in England and Wales, published in December 2005, was prepared by the British Horse Industry Confederation in partnership with the Department for Environment, Food and Rural Affairs, the Department for Culture, Media and Sport and the Welsh Assembly Government³.
5. The Strategy includes the following aim:

Aim 5 'Increase access to off-road riding and carriage driving', including the encouragement and improvement of urban and suburban riding and carriage driving.

¹ The health benefits of horse riding in the UK – Research undertaken by the University of Brighton and Plumpton College

² The National Equestrian Survey 2011 (BETA)

³ <http://www.bhic.co.uk/downloads/full-strategy-report.pdf>

The Paucity of the Equestrian Public Rights of Way Network

6. The length of the public right of way network in England currently amounts to 188,700km, consisting of 146,600km of footpaths, 32,400km of bridleways, 3,700km of byways and 6,000km of restricted byways. Horse riders therefore, currently have access to only 22% of public rights of way and horse-drawn vehicle drivers to only 5%. The length of the public right of way network in Wales currently amounts to 33211km, consisting of 26320km of footpaths, 4965km of bridleways, 431km of byways and 1495km of restricted byways. Horse riders therefore, currently have access to only 21% of public rights of way and horse-drawn vehicle drivers to only 6%. ***Many rights of way are now disconnected from each other because the roads that should connect them are no longer safe for equestrians to use because of the speed and volume of motorised traffic on them.*** This leaves many equestrians without a safe local route to use.

Road Safety

7. The NHS Hospital episode statistics for 2011 – 12 show that there were 4,142 'animal rider or occupant animal drawn vehicle injured in transport accident' (V80)

<http://www.hesonline.nhs.uk/Ease/servlet/ContentServer?siteID=1937&categoryID=211>

8. 504 road accidents involving horses have been recorded on The Society's www.horseaccidents.org.uk reporting website since it was launched in the autumn of 2010. Many accidents and near misses are still not being recorded yet so the total should be much higher

9. In 2011 and 2012 there were 400 incidents on roads reported to the website. These included:

- 10 rider fatalities
- 62 serious rider injuries
- 31 horse fatalities
- 19 serious horse injuries.

10. The BHS recognises the need to educate equestrians and motorists to understand how to make our roads safer both for equestrians and motorists alike and has produced two advisory leaflets 'Road Sense for Riders'

http://www.horseaccidents.org.uk/Advice_and_Prevention/Riding_on_the_Road/Be_Seen_Be_Safe.aspx

and 'Horse Sense for Motorists'

http://www.horseaccidents.org.uk/Advice_and_Prevention/Riding_on_the_Road.aspx

and a [Hit Your Brakes, Not My Horse](#) poster

11. The [Think!](#) Campaign highlights the need for drivers to take care when they meet horses on the road.

Response to consultation questions:-

Q.1 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.

BHS Response

The Department for Transport estimate that increasing the speed limit for HGVs over 7.5t from 40mph to 50mph on single carriageway roads would save between 2.1 million and 2.4 million driving hours per year. This would result in a net financial benefit of between £31.1 million and £36 million per year.

Whilst the BHS accepts that there would be financial benefits to the freight industry from an increased speed limit, and economic benefits to the country arising from reduced costs to the freight industry, it does not support Policy Option 1. The BHS believes that to increase the national speed limit for HGVs over 7.5t from 40 to 50mph will lead to higher numbers of accidents involving these HGVs and equestrians using single carriage roads. Single carriage roads are the roads that equestrians use most often to access the fragmented equestrian rights of way network.

Any increase in speed limits would encourage even faster, more dangerous driving to the great detriment of horse riders, who have very few bridleways on which they can ride safely.

Current speed enforcement policies that allow a tolerance of 10%+2 means that the 40 limit is not enforced until 46 MPH is reached. Thus, if the limit is raised to 45, enforcement won't occur until over 51 mph. Similarly, a limit of 50 would permit HGV drivers to travel at 57 mph before incurring penalties.

The attached video illustrates the lack of width that exists on many single carriageway roads and the speed that vehicles can quickly come upon horses <http://think.direct.gov.uk/video-horse-sense.html> any increase in speed of HGVs will only exacerbate this problem and lead to more accidents. HGVs over 7.5t are subject to a lower speed limit than other vehicles because they are much

heavier, and take much longer to slow down and stop, especially when laden, than a car travelling at the same speed.

The NHS Hospital episode statistics for 2011 – 12 show that there were 4,142 ‘animal rider or occupant animal drawn vehicle’ injured in transport accidents which represents a significant financial cost to the country. The BHS notes that it has not been possible to assess the effects on road safety if vehicle limits for HGVs over 7.5t are increased on single carriageway roads. The BHS considers that there should be no such increase until a full impact assessment has been carried out into the impact that such an increase in speed limits would have on vulnerable road users, especially equestrians.

Q.2 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.

BHS Response

The Department for Transport estimate that increasing the speed limit for HGVs over 7.5t from 40mph to 45mph on single carriageway roads would save between 1.1 million driving hours per year. This would result in a net financial benefit of £18 million per year.

Whilst the BHS accepts that there would be financial benefits to the freight industry from an increased speed limit, and economic benefits to the country arising from reduced costs to the freight industry, it does not support Policy Option 2 for the same reasons as detailed in our response to Policy Option 1.

Q.3 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

BHS Response

The BHS considers that the national speed limit for HGVs over 7.5t on single carriageway roads should remain unchanged at 40mph.

Q.4 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.

BHS Response

The BHS believes that whilst the current speed limit of 40mph for HGVs over 7.5t creates additional costs for operators when compared with an increased speed limit of 45mph or 50mph this cost to the nation is more than offset by the anticipated increase in the health budget arising from the increased number of accidents that the BHS believes would occur if the speed limit were increased.

Q.5 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?

BHS Response

On many single carriageway roads overhanging branches mean that those who transport horses often have to drive a tall vehicle towards the middle of the road to avoid overhanging branches with the consequence that if there was traffic coming the other way, you either have to stop suddenly or let the overhanging branches collide with or scrape over the vehicle, any of which can cause alarm or injury to the horses inside, and possible damage to the vehicle. It is likely that many horseboxes will continue to have to drive slowly and cautiously on these roads, and if other HGVs are then generally travelling faster, this may increase the risk of road rage against those transporting horses.

Road safety effects

Q.6 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.

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 to **Q.6**.

BHS Response

Traffic will 'platoon' at the higher speeds and this will increase accident risks. On rural roads or roads used by riders there is an increased danger with increased speed, fast lorries frighten horses, and are intimidating for other users, particularly cyclists and pedestrians. Higher speeds are noisier and more polluting. Higher HGV speeds will mean that overtaking traffic will have to travel faster to overtake thereby increasing the risk of accidents

Q. 7 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?

BHS Response

The BHS has no such evidence

Air quality, noise and health impacts

Q.8 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.

BHS Response

The BHS has no such information

Q. 9 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 standards⁹;
- c) Noise levels;
- d) Areas currently identified as noise hotspots¹⁰

BHS Response

The BHS believes that noise pollution would be increased if the speed limit was increased

Q.10 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

BHS Response

The BHS has no comment on this question

Q.11 Do you think either of the policy options goes against the underlying principles of the EU Environmental Noise Directive¹¹ or of the Noise Policy Statement for England?¹²

BHS Response

The BHS has no comment on this question

Q.12 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.

BHS Response

No the impact that the policy options would have on vulnerable road users and especially equestrians has not been considered in the Impact Assessment

Other impacts

Q.13 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?

BHS Response

The BHS has no comment on this question

Q.14 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?

BHS Response

The BHS has no comment on this question

Q.15 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.

BHS Response

The BHS has no comment on this question

Q.16 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 1/06.¹³ 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?

BHS Response

The BHS has no comment on this question

Q.17 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.

BHS Response

The BHS provides road safety advice and information to equestrians. If speed limits for HGVs were changed the BHS would need to update its advice accordingly, however this is unlikely to result in significant costs. If more accidents involving equestrians occur as a result of any increase in the speed limit the BHS would incur additional cost in addressing those accidents

Dated 28 January 2013.

Mark Weston
Director of Access, Safety and Welfare
The British Horse Society
Abbey Park
Stareton
Kenilworth
Warwickshire
CV8 2XZ



INVESTOR IN PEOPLE

Registered Charity Nos. 210504 and SC038516. A company limited by guarantee. Registered in England & Wales No. 444742

