



UK metric association

Campaigning for a **single** *rational* system of measurement

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Rob Hagger/Mary Allum
Department for Transport
Vehicle Roadworthiness & Enforcement Branch,
2/09 Great Minster House,
76 Marsham Street
London
SW1P 4DR

Dear Mr Hagger/Ms Allum,

Re: Consultation on HGV and PCV motorway speed limits

I am writing to give the response of the UK Metric Association (UKMA) to the above consultation.

UKMA is an independent, non-party political, single issue organisation which advocates the full adoption of the international metric system ("Système International" - SI) for all official, trade, legal, contractual and other purposes in the United Kingdom as soon as practicable. UKMA is financed entirely by membership subscriptions and personal donations.

Our response is based on consultation with our members through a private internet forum and was approved by our Committee on 29 March 2010.

Introduction

We agree with the Road Safety Minister, Paul Clark's comments, that everyone should "abide by the same rules regardless of the age of their vehicle", and that speed limits would benefit from being simplified so that all drivers are aware of them. However, we do not agree that the proposed speed limit changes best meet these aims.

The Proposals

We note that the proposed changes in HGV and PCV speed limits are in response to disparities resulting from recently introduced **90 km/h** and **100 km/h** speed limiter regulations.

In sections 4.2 and 4.3, the consultation document states that HGV and PCV speed limiter settings are 56 mph and 62.5 mph respectively. This is not technically correct,

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as these mph values are only approximations of the 90 km/h and 100 km/h values defined in UK legislation. See [SI 2004 2102](#) and [SI 2005 3170](#) .

In section 4.3 of the consultation document it states that :

“it would be unrealistic to align the relevant speed limits exactly with speed limiter settings”.

We strongly disagree with this statement. Not only is it realistic to align relevant speed limits exactly with speed limiter settings, it is actually the most practical option. To set road speed limits in different terms from those that define speed limiter settings is illogical and inconsistent, especially if the intention is to align speed limits with speed limiter settings.

In section 4.4, the consultation document makes no attempt to justify a **rounding up to 60 mph** of what should be a 90 km/h (approx. 56 mph) speed limit, and a **rounding up to 65 mph** of what should be a 100 km/h (approx. 62 mph) speed limit. It would seem to us that if speed limits are to be rounded at all, they should be **rounded down** to avoid potential legal issues that could arise from having a speed limit higher than that intended by speed limiter legislation.

To achieve the consultation’s objective of aligning motorway speed limits with speed limiter settings, we propose that the most straight-forward option, would be to set motorway speed limits for all HGVs and PCVs to be **equal** to their corresponding speed limiter settings. This will avoid any disparity between speed limiter values and corresponding motorway speed limits. This is probably the approach that all other countries affected by the requirements of Directive 2002/85/EC would take. Hence:

Where new vehicles are required to have a speed limiter of 90 km/h, the speed limit for all vehicles of that class should be 90 km/h.

Where new vehicles are required to have a speed limiter of 100 km/h, the speed limit for all vehicles of that class should be 100 km/h.

We propose therefore that the table in section 4 of the consultation document should be modified as follows:

Vehicle Class	Current motorway limit	Proposed limit	Speed limiter setting
HGVs 3.5 – 7.5 tonnes	70 mph	90 km/h	90 km/h
HGVs more than 7.5 tonnes	60 mph	90 km/h	90 km/h
PCVs less than 12 m long	70 mph	100 km/h	100 km/h
PCVs more than 12 m long	60 mph	100 km/h	100 km/h

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Because HGVs and PCVs have been required since the late 1970s to be fitted with speedometers that can display speeds in mph and km/h, there is no reason why drivers of HGVs and PCVs, not fitted with speed limiters, should not be able to clearly see that they remain below a speed limit set in round km/h values.

We would of course not wish to recommend a situation where two different systems were used on *road signs* simultaneously, however HGV and PCV speed limits are currently not signed. Consequently, we can see no reason to prevent new HGV and PCV speed limits from being defined in terms of km/h.

Whilst it is clearly unsatisfactory for some vehicles to have speed limits in km/h and other vehicles to continue to have speed limits in mph, this is actually the de facto situation on our roads today because of the nature of international speed limiter regulations, and will remain so regardless of the outcome of this consultation.

The situation can only be fully resolved satisfactorily by a review of speed limits for *all* vehicles, and for new speed limits to be set universally in km/h, as has already happened in Ireland in 2005. Changing HGV and PCV mph speed limits to more closely approximate, but not exactly match, km/h speed limiter legislation is unsatisfactory.

Consultation Questions

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?

No. 60 mph (96.6 km/h) is still 7.3 % higher than the HGV speed limiter setting of 90 km/h. The 70 mph speed limit should be reduced to 90 km/h.

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?

No. 65 mph (104.6 km/h) is still 4.6 % higher than the PCV speed limiter setting of 100 km/h. The 70 mph speed limit should be reduced to 100 km/h.

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?

No. 65 mph (104.6 km/h) is 4.6 % higher than the 100 km/h speed limiter setting of these vehicles. The 60 mph (96.6 km/h) speed limit should be raised to 100 km/h to align it with the speed limiter setting of this vehicle class.

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?

No comment.

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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.

We believe that it is neither logical nor wise to be setting speed limits that are still in excess of speed limiter settings. There may be unforeseen legal consequences of doing so.

Conclusion

Following the recent acknowledgement by the DfT that a disproportionate number of bridge strikes are caused by foreign drivers failing to understand imperial units, we would point out that the commercial vehicle speed limiter issue is yet another reason why continuing to use obsolete imperial units for speed and distance measurements on our roads has ceased to be tenable in a world where all other countries (except the USA) use speed limits defined in km/h.

All such issues will be resolved by an orderly switchover to standard metric measurements for all speed and distance measurements on our roads. We would urge that plans for the switchover should be put into place as soon as is practical.

Yours sincerely

Derek Pollard
Secretary

References:

SPEED LIMITER LEGISLATION

The Road Vehicles (Construction and Use) (Amendment) (No.2) Regulations 2004 - SI 2004 No.2102

<http://www.opsi.gov.uk/si/si2004/20042102.htm>

The Road Vehicles (Construction and Use) (Amendment) (No.5) Regulations 2005 - SI 2005 No.3170

<http://www.opsi.gov.uk/si/si2005/20053170.htm>

UK Metric Association (UKMA) (2004) *A very British mess* UKMA

UK Metric Association (UKMA) (2006, revised 2009) *Metric signs ahead* UKMA

UK Metric Association (UKMA) (2009) *Road signs* [online] available at

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Paice, R.B. (2005) *Ireland shows the way with Metric speed limits* in *UKMA News*, Vol 3. Issue 1 UKMA

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