

M32 Eastville Viaduct Response to Statutory Instrument Consultation

Proposed Permanent 40mph Speed Limit

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Introduction

National Highways recently consulted on a proposed Statutory Instrument to implement a 40mph permanent speed limit in both directions on the M32 motorway from a point 83 metres north of the northern mechanical join of the Eastville Viaduct to a point 22 metres north of the Severn Beach railway line overbridge.

The consultation launched on Monday 2 December 2024 and closed at 23:59 on Sunday 26 January 2025.

This document provides a summary of the responses received to the consultation and National Highways' response.

Background to the consultation

The M32 Eastville Viaduct is an elevated 1.1km section of the M32 - a 7.1km-long motorway that links the M4 at Junction 19 (Hambrook Interchange) with Bristol city centre. It is part of the Strategic Road Network (SRN) owned and maintained by National Highways and carries 65,000 vehicles a day.

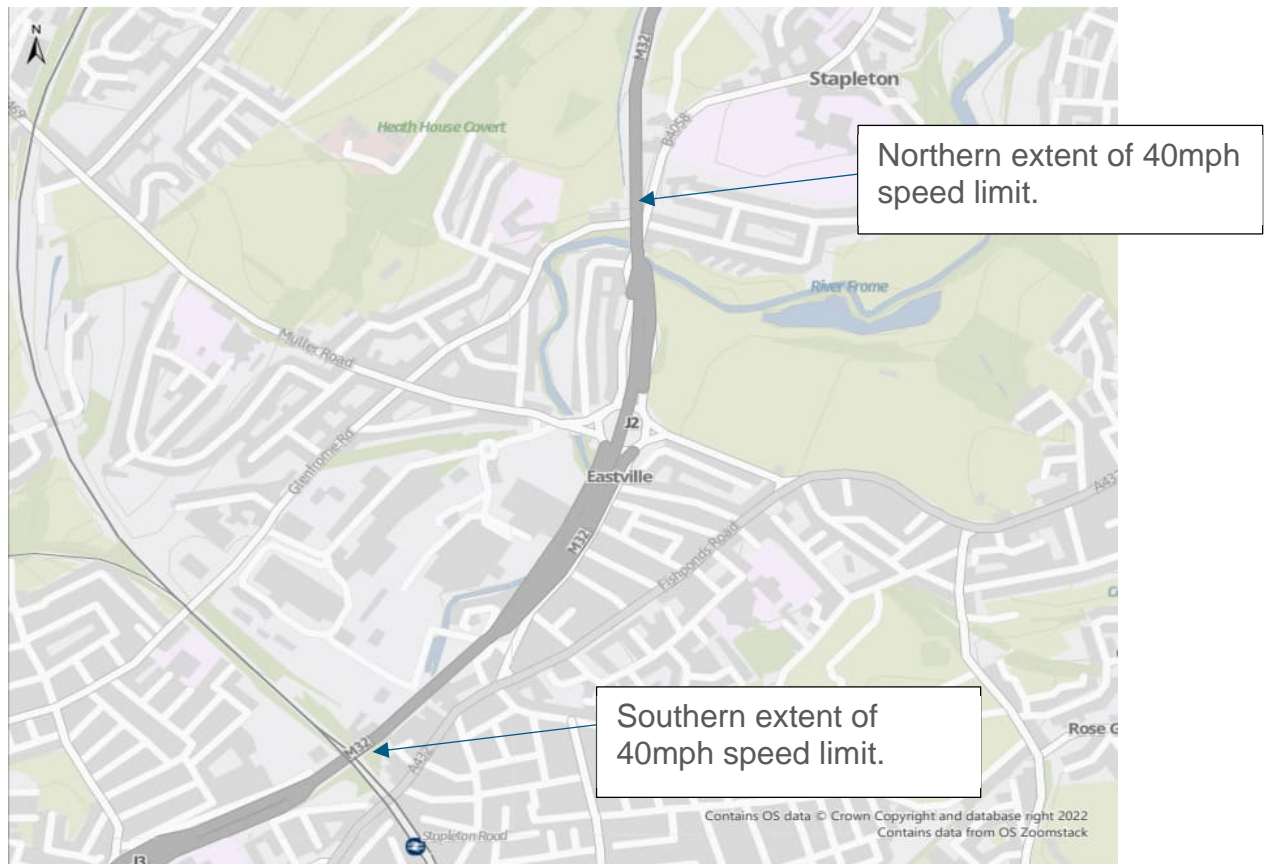
A temporary 40mph speed limit is currently in place on the M32 in both directions between a point 83 metres north of the northern mechanical join of the Eastville Viaduct to a point 22 metres north of the Severn Beach railway line overbridge. This temporary speed limit was implemented using a Temporary Traffic Regulation Order as a result of an operational review, which deemed the speed restriction necessary for safety reasons.

National Highways has proposed the 40mph speed limit is made permanent in the form of regulations made by way of a Statutory Instrument.

The speed limit changes are required due to the geometry of this section of the motorway. The road was originally built in the 1970s and adhered to design standards of the time. If it was built today the Design Manual for Roads and Bridges (DMRB) would recommend a speed limit of 40mph due to the short distance between Junctions 2 and 3, which results in a high level of weaving traffic (i.e. manoeuvring between traffic lanes). The elevated section of the motorway around Junction 2 also has limited forward visibility, narrow lanes and narrow hard shoulders, which don't meet the design standards of today's motorways. The proposed speed limit changes are required on safety grounds and to help ensure a smooth-running network.

The DMRB, or Design Manual for Roads and Bridges, is a comprehensive set of standards and guidelines used in the United Kingdom for the design, assessment, and operation of motorways and all-purpose trunk roads. It provides detailed technical requirements to ensure consistency, safety, and efficiency in highway projects.

For more information, please visit www.standardsforhighways.co.uk/dmrb.



Map of affected stretch of the M32 motorway

The consultation process

National Highways considers the views of stakeholders and listens to feedback from anyone with an interest in the proposals as part of the consultation process.

Details about the consultation were sent to 87 stakeholders who were identified as having a potential interest in the proposals due to their role or location. These stakeholders included local councillors, local Government bodies and MPs, emergency services and transport services, statutory and regulatory bodies, business groups and Equality, Diversity and Inclusion (EDI) groups.

The consultation document was also published on National Highways' Citizen Space website here: <https://nationalhighways.citizenspace.com/he/m32-eastville-viaduct-40mph-statutory-instrument>

The consultation document explained the proposals and included a consultation response form, which invited stakeholders to share their feedback on the proposals with National Highways. A link to an online version of the consultation response form was also available through the consultation webpage.

The consultation launched on 2 December 2024 and closed at 23:59 on 26 January 2025.

National Highways has considered all feedback received during the consultation. This document provides a summary of the comments received and sets out National Highways' response.

Summary of consultation responses

In total 13 responses to the consultation were received. Eleven via the online form and two via email into the M32 mailbox as an acknowledgement of the consultation notice.

The table below shows the breakdown of responses received from different respondent groups:

Respondent Group	Number of responses received via online form	Number of responses received via email
Member of the public	6	
Emergency services (Ambulance service, Police and Fire and Rescue Service)	2	1
Driver Vehicle Standards Agency		1
Large Company	1	
Small to Medium Enterprise (up to 50h employees)	1	
Other	1	
Total	11	2

For the purpose of the analysis, the numbers will reflect the 11 responses received via the online form. The two responses received via email acknowledged the notification of the consultation and the proposal to make permanent the temporary 40mph speed limit, but offered no further feedback therefore these responses have not been included in the analysis.

The consultation response form asked respondents if they were in favour of National Highways' proposal to introduce a permanent 40mph speed limit on the M32 carriageways between Junction 2 and the railway overbridge. The responses were as follows:

Response	Total
Yes	4
No	7

Respondents were invited to comment on the proposals and eight respondents provided comments. The responses covered multiple aspects and as such respondent's views were sorted into themes, which are summarised below along with National Highways' response.

1. The proposed speed limit will help reduce the number of road traffic collisions

Two respondents in favour of the proposal commented that the speed limit has the potential to reduce the number and severity of road traffic collisions.

“...thereby reducing the demand on our (Ambulance) service.”

National Highways response

National Highways acknowledges the positive support and the point of view shared, while noting that the proposal for making permanent the temporary 40mph speed limit is due to the geometry of the road and not based on collision data.

2. Consistent approach applied to speed limits on all roads

One respondent in favour of the proposal commented that speed limits should always be appropriate for the road conditions and would be keen to see the principle applied to similar junctions.

National Highways response

National Highways acknowledges the support for the proposal and agrees that speed limits are determined by many factors including but not limited to geometry.

The current proposal is based on the geometry of this specific section of road. Decisions regarding other roads are not within the scope of this consultation, but the feedback is noted.

3. Current design standards and latest changes

Two respondents commented that the challenge with maintaining national speed limits is tied to changes in design standards for motorways, as a result some roads are not compliant. One respondent raised the query:

“...must we accept that ALL old motorways have their speeds downgraded?”

National Highways response

The proposal is to make permanent the current temporary 40mph speed limit based on the geometry and design of the road section. The road was originally built in the 1970s and adhered to design standards of the time. If it was built today the Design Manual for Roads and Bridges (DMRB) would recommend a speed limit of 40mph due to the short distance between Junctions 2 and 3, narrow lanes and narrow hard shoulders.

The current proposal is based on the geometry of this specific section of road. Decisions regarding other roads are not within the scope of this consultation but the feedback is noted.

4. Impact on traffic flow

One respondent commented that lowering the speed limit will negatively impact traffic flows on the motorway, resulting in delays and congestion.

National Highways response

This section of road is currently used by 65,000 vehicles in both directions per day. National Highways does not expect to see a change in the volume of vehicles as a direct result of the proposed speed restriction.

The temporary 40mph speed limit has been in place for some time and therefore National Highways does not expect to see an increase in congestion. As this stretch of road sees a high level of weaving traffic (i.e. manoeuvring between traffic lanes) due to the closeness of the junctions, driving at a consistent speed of 40mph maintains traffic flow and eases congestion.

5. Concerns over air pollution

One respondent raised the concern that limiting the speed to 40mph will result in more congestion, and therefore pollution.

National Highways response

The temporary 40mph speed limit has been in place for some time and therefore National Highways does not anticipate seeing an increase in congestion and therefore pollution. As this stretch of road sees a high level of weaving traffic (i.e. manoeuvring between traffic lanes) due to the closeness of the junctions, driving at a consistent speed of 40mph maintains traffic flow and eases congestion.

6. Impact to local business

There was a concern from one respondent that reduced speeds on the motorway may impact negatively on businesses operating in and around the area, suggesting that the speed limit would....”

“...have a huge cost to business.”

National Highways response

The temporary 40mph speed limit has been in place for some time. As this stretch of road sees a high level of weaving traffic (i.e. manoeuvring between traffic lanes) due to the closeness of the junctions, driving at a consistent speed of 40mph will maintain current traffic flows. This will not negatively impact businesses operating in and around the area.

7. Concerns over maintenance

One respondent raised a concern that limiting the speed is only required due to poor maintenance of the road, and that the motorway should be well maintained so it could keep the limit at 70mph.

National Highways response

The proposal is not in response to the maintenance of the road, it is to make permanent the current temporary 40mph speed limit based on the geometry and design of the road section.

The road was originally built in the 1970s and adhered to design standards of the time. If it was built today the Design Manual for Roads and Bridges (DMRB) would recommend a speed limit of 40mph due to the short distance between Junctions 2 and 3, narrow lanes and narrow hard shoulders.

8. Lack of collision data / lower speeds not reducing collisions

Two respondents commented that there is no data about collisions shown to justify maintaining the 40mph speed limit on M32 Viaduct. There was a suggestion that National Highways should publish accident data from before and after the temporary speed limit change as part of this consultation.

An opinion was also shared that *“higher limits keep people alert and therefore less likely to have an accident”* and recalled National Highways statistics that roads with higher speed limits have lower accident rates.

National Highways response

The proposal is to make permanent the current temporary 40mph speed limit based on the geometry and design of the road section. The proposal was based on the geometry of the road aligning with the DMRB design specifications and not collision data.

The road was originally built in the 1970s and adhered to design standards of the time. If it was built today the Design Manual for Roads and Bridges (DMRB) would recommend a speed limit of 40mph due to the short distance between Junctions 2 and 3, narrow lanes and narrow hard shoulders.

As reported in the Office of Rail and Road's Annual Assessment of Safety Performance on the Strategic Road Network (13 March 2025)¹ the Strategic Road Network (SRN) "remains one of the safest road networks in the world. Casualty rates on the SRN are significantly lower than the local road network in England."

9. Maintaining motorway speed limits

Two respondents commented that motorway speed limits should be maintained at 70mph with a third respondent also noting that if a motorway is reduced to 40mph permanently,

“...it is no longer a "motorway" in any definition of the word”

¹ <https://www.orr.gov.uk/sites/default/files/2025-03/third-annual-assessment-of-safety-performance-on-the-srn.pdf>

National Highways response

Whilst the Department for Transport's 'Setting Local Speed Limits' guidance document² provides that the national speed limit for dual carriageways and motorways in England is 70mph, it notes that traffic authorities may impose alternative local speed limits in situations where local needs and conditions indicate that a different speed limit is appropriate.

The proposal is to make permanent the current temporary 40mph speed limit based on the geometry and design of the road section. The road was originally built in the 1970s and adhered to design standards of the time. If it was built today the Design Manual for Roads and Bridges (DMRB) would recommend a speed limit of 40mph due to the short distance between Junctions 2 and 3, narrow lanes and narrow hard shoulders. The proposed speed limit changes are required on safety grounds and to help ensure a smooth-running network.

The M32 currently remains classified as a motorway and the introduction of a permanent 40mph speed limit does not alter this status.

10. Consultation concerns

One respondent commented that opinions submitted in consultations will have no impact and that decisions on speed limits will be made regardless of public opinion.

National Highways response

National Highways takes all consultations seriously and understands their importance in informing customers of potential changes and gathering feedback.

All National Highways consultations are undertaken in compliance with the Government's Consultation Principles which can be found here:
<https://www.gov.uk/government/publications/consultation-principles-guidance>.

Each response is carefully reviewed by the Project Team, addressed in the Consultation Response and factored into the decision-making process.

11. Enforcing motorway speed limits and deterring drivers

One respondent commented that the proposed 40mph speed limit will require constant enforcement and expressed concern the reduction in speed limit was about trying to:

"...deter people from driving on them [strategic roads]"

With a second respondent expressing a similar view that the 40mph speed limit was about raising money through fines and demonising those who choose to drive.

² <https://www.gov.uk/government/publications/setting-local-speed-limits/setting-local-speed-limits#:~:text=the%2030mph%20speed%20limit%20on,on%20dual%20carriageways%20and%20motorways>

National Highways response

The proposal is to make permanent the current temporary 40mph speed limit and not about enforcement or deterring people from using the Strategic Road Network (SRN).

National Highways are not responsible for enforcing speed limits, this is carried out by the Police. Avon and Somerset Police have been consulted through this consultation and have responded accordingly.

Consultation Outcome

National Highways has considered all responses received to the consultation in this report and is grateful to respondents for their contributions.

Since this consultation, a safety risk assessment has been completed in accordance with the Design Manual for Roads and Bridges' (GG 104) Requirements for Safety Risk Assessment³, which determined that there is an operational safety benefit for road users in also making permanent the current temporary 60mph speed limit on the M32 southbound approach to Eastville Viaduct.

The M32 southbound approach to Eastville Viaduct currently consists of a temporary step-down speed reduction from a point 30 metres south of the centre of Heath House Lane Overbridge, where the speed limit reduces from 70mph to 60mph, ahead of the 40mph speed limit at the point 83 metres north of the northern mechanical join of the Eastville Viaduct.

It is now necessary for National Highways to also consult on a proposal to make the current temporary 60mph speed limit permanent. This consultation will launch in Spring 2025.

This further consultation will cover both the original 40mph and the additional 60mph speed limit on the M32 in the vicinity of Eastville Viaduct. Information will be available on National Highways' Citizen Space website. Information will also be emailed out to stakeholders when the consultation launches in Spring 2025.

³ GG 104 Requirements for safety risk assessment "sets out the framework and approach for a safety risk assessment to be applied when undertaking any activity that does or can have an impact on safety on National Highway's motorway and all-purpose trunk roads, either directly or indirectly". For more information see: <https://www.standardsforhighways.co.uk/search/html/6393d1c9-31da-4675-b1b8-c43703409f1e?standard=DMRB>