

Proposed Restricted Roads (20mph Limit) (Scotland) Bill

Page 2: About you

Are you responding as an individual or on behalf of an organisation?

an individual

Which of the following best describes you? (If you are a professional or academic, but not in a subject relevant to the consultation, please choose "Member of the public".)

Academic with expertise in a relevant subject

Please select the category which best describes your organisation

No Response

Please choose one of the following; if you choose the first option, please provide your name or the name of your organisation as you wish it to be published.

I am content for this response to be attributed to me or my organisation

Please insert your name or the name of your organisation. If you choose the first option above, this should be the name as you wish it to be published. If you choose the second or third option, a name is still required, but it will not be published.

David Weston

Please provide details of a way in which we can contact you if there are queries regarding your response. Email is preferred but you can also provide a postal address or phone number. We will not publish these details.

Page 7: Your views on the proposal

Q1. Which of the following best expresses your view of the proposal to replace the current 30mph default speed limit on restricted roads with a 20mph limit.

Fully opposed

Q1. Which of the following best expresses your view of the proposal to replace the current 30mph default speed limit on restricted roads with a 20mph limit.

Please explain the reasons for your response

I am fully opposed to this proposal for a few contentious reasons. Firstly, as a member of public that has a strong academic interest in road safety, I personally believe 20mph limit and zones to be a construct whose efficacy is limited. The main purpose of a speed limit is to constrain vehicular traffic to a particular arbitrary value, for the purposes of either helping with traffic flow, helping with access and egress from the highway - or for the safety of other vulnerable road users, pedestrians and the like. In my experience - and as your consultation document shows, compliance of 20mph limits is low. Deservedly so, in my opinion. As a target speed in a residential area, it is simply too low. Yes, I am using the phrase "target speed", because surely this is the speed at which one should aim for, given a situation with little to no road hazards. The more hazards that are there, the more a road user instinctively slows down. You yourself probably do this as well, when you come across a hazard, one instinctively slows down in order to properly evaluate this hazard, and to give all parties extra time to figure out how one is going to proceed. If 20mph limits were brought in nationally to replace 30mph limits, there is a risk to the driver of falling complacent (because everyone knows that driving slower is safer, right?). Hence, when a driver encounters a hazard, there is a chance that instead of properly reacting to the hazard, the driver will carry on through at 20mph, not properly evaluating the hazard, because it's "slow enough" - and risk a low speed collision. Additionally, there are legal and monetary aspects to this as well. For example, in order for this bill - well, act if it were to be implemented - to produce enforceable speed limits, every single terminal sign would need to be re-considered. Performing an audit of street signage, especially in rural locals that tend to get forgotten by local authorities would cost a fair amount of money - something that in this period of austerity would be ill-advised to do. What about if a road user gets caught speeding? If caught exceeding 20mph by a constable/professional staff member of the police - and the terminal sign at the point the road user entered this restricted area was reading 30mph, then defence of insufficient signage exists.

Q2. Could the aims of this proposal be better delivered in another way (without a Bill in the Scottish Parliament)?

No

Please explain the reasons for your response

<http://www.legislation.gov.uk/ssi/2014/274/introduction/made> The A9 speed limit change for HGVs were made through a Scottish Statutory Instrument. One could make secondary legislation to change the speed limit of restricted roads to 20mph but creating secondary legislation for such a wide scale and costly change would be an abhorrent abuse of process.

Q3. What do you think would be the main advantages, if any, of the proposal?

- Increased time for a road user to evaluate road hazards
- Decreased stopping distances
- Less traumatic injuries for vulnerable road users that are involved in collisions

Q4. What do you think would be the main disadvantages, if any, of the proposal?

- Decrease on concentration on the road: perceived risk has been lowered, thus driver feels safer, can be less attentive
- Increase in journey times, not due to the speed the vehicle is travelling at, but due to the decrease in flow of the traffic
- Increase in local emissions, due to a vehicle emitting infinitesimally less harmful emissions over a greater time span for any given distance travelled
- Potential increase in accidents, due to decrease in perceived risk; road users more willing to take chances
- Large scale non-compliance of the speed limit, perhaps breeding contempt for other, higher speed limits

Q4. What do you think would be the main disadvantages, if any, of the proposal?

- (30mph, 40mph, 50mph limits)
- Large scale inability to enforce this new restricted limit
 - Wastage of public money in auditing current signage, replacing new signage, installing repeaters and applying for TROs
 - Lengthly delays for new TROs (full process can take in excess of a year, dealing with consultations, deliberations and procurement orders)

Q5. What other measures do you think would be needed to maximise compliance with the new national 20mph speed limit on restricted roads, for example in relation to advertising signage and police enforcement.

- None, because your 20mph limit idea is unfeasible.
- Police in certain areas are not enforcing 20mph limits.

Page 12: Financial implications

Q6. Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have?

| | Significant increase in cost | Some increase in cost | Broadly cost-neutral | Some reduction in cost | Significant reduction in cost | Unsure |
|---------------------|------------------------------|-----------------------|----------------------|------------------------|-------------------------------|--------|
| Scottish Government | | X | | | | |
| Local Authorities | X | | | | | |
| Motorists | X | | | | | |
| Other | X | | | | | |
| Police Scotland | | | | | | |

Please explain the reasons for your response

Scottish government: Legislation doesn't cost much to enact, advertising campaigns can come out of general expenditure. Revenue from speeding tickets goes to central funds, unsure whether it is Westminster or Scottish central funds that are the destination. Local authorities: Restricted roads are roads usually under local authority control, they will be the authorities responsible to performing audits on roads/highways to determine the new speed limit. As previously explained, the action of creating a TRO to keep a limit at 30mph, followed by the cost of procuring new signage throughout a local authority would be insane. Motorists: Increased fuel costs, increased maintenance costs (clogged DPFs and coked up engines), costs by fines incurred by road users being caught at the speed most travelled at in a 20mph limit (as quoted by yourself, 25mph!!), increases in insurance premiums Other: A general cost to the economy as slower speeds produce more traffic and thus reduce economic throughput.

Q7. Do you believe there will be any other benefits to reducing the speed limit from 30mph to 20mph?

There will be no benefits to such a scheme.

Page 14: Equalities

Q8. What overall impact is the proposed Bill likely to have on the following protected groups (under the Equality Act 2010): race, disability, sex, gender re-assignment, age, religion and belief, sexual orientation, marriage and civil partnership, pregnancy and maternity?

Neutral (neither positive nor negative)

Please explain the reasons for your response

- Reduction in road noise, to the detriment of deaf people? - Increase in chance taking by vulnerable road users (wheelchair, mobility scooter users) increasing a chance of a collision

Q9. Could any negative impact of the proposed Bill on any of these protected groups be minimised or avoided?

Not really, no. But the solutions for those issues are outwith the scope of this bill.

Page 16: Sustainability of the proposal

Q10. Do you consider that the proposed Bill can be delivered sustainably i.e. without having likely future disproportionate economic, social and/or environmental impact?

No

Please explain the reasons for your response:

Please refer to the entirety of my response of the consultation for further clarification to this answer.

Page 17: General

Q11. Do you have any other comments or suggestions on the proposal to establish a 20mph default speed limit on restricted roads?

It is insanity from all angles. Politically, legally and morally.