

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".)

Professional with experience 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 would like this response to be anonymous (the response may be published, but no name)

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 If you choose the second or third option, a name is still required, but it will not be published.

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 believe there's a strong case for 20mph limits in *specific* areas around schools, shops and hospitals, where road safety can be demonstratively improved in response to particular issues with speeding or visibility. Likewise, residential streets which are cul-de-sacs can be designed from the outset as Homezones, so that shared surfaces and passive traffic calming can be put in place from the outset which keep speeds to 10mph or less - regardless of the regulated speed limit. However, I believe that a *blanket* 20mph restriction on distributor roads, through-routes and the like will increase traffic congestion which in turn will increase vehicle-generated pollution and noise levels through drivers having to remain in second gear (which most cars and LGV's will have to do), which generally burns more fuel hence generating more CO2 and NOx emissions. p19 of the consultation paper states "Drivers travelling in a 20mph limit are more likely to have a smoother journey with less sharp braking and re-acceleration as traffic flow is improved and drivers have longer to respond to hazards, " but no evidence is provided to back that assertion up. As the proposed limits would largely be applied in urban areas, the affected roads may already have poor air quality. Incidentally, the table on p9 of the consultation document cites Euro 4 emissions values, whereas Euro 5 and Euro 6 are more relevant today given the numbers of modern vehicles on the roads today - and even those tests aren't reflective of "real world" emissions, as the Volkswagen/Audi emissions investigation has shown. A blanket restriction will also increase journey times, and that may lead to frustration, and to drivers paying less attention to obeying the limit which will ultimately be counter-productive in terms of road safety. p20 of the consultation paper admits that in 2015, 20mph roads had the lowest level of speed limit compliance in the UK, across all vehicle types – for example, 84% of cars exceeded the limit (compared with 52% on 30mph roads). A recent piece of research demonstrated that accidents may actually increase in 20mph zones: the suggested explanation was that people pay less attention because of how slowly they are travelling, in other words they have a false feeling of safety. Finally, the consultation document conflates completely unrelated issues, such as improving mental health through physical activity - with improving road safety through reducing speed limits. There's no attempt to explain how these two relate to each other. It also makes several conjectural points, such as "Although it is hard to evidence, we believe the introduction of 20mph speed limits as default in Scotland will effect a cultural change which will provide a significant long term benefit." Without hard evidence, this reads like propaganda from environmental pressure groups with a political agenda, such as Sustrans, rather than a meaningful attempt to improve road safety and reduce accidents. Imposing a blanket 20mph limit may result in drivers having less respect for speed limits generally, as the process of imposing lower limits may be perceived as a political rather than a road safety initiative.

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

Yes (if so, please explain below)

Please explain the reasons for your response

As per the previous point, local authorities can already introduce 20mph limits, where necessary, using TRO's.

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

None.

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

As per my original point, increased emissions, increased noise pollution, increased journey times, reduced respect for limits, and suspicion about a political agenda behind speed limits.

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.

This would require large expenditure on advertising campaigns, signage, active policing, radar speed cameras etc. which is probably unjustified.

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

As per previous point, policing costs will increase, and large amounts of new signage will be required, along with advertising campaigns to educate drivers.

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

No

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

Reducing speed limits is scarcely relevant to many of the groups mentioned above.

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

No

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:

No, it may well have a major economic cost, and road safety measures may be better applied elsewhere.

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?

No