

# 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".)

Member of the public

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 If you choose the second or third option, a name is still required, but it will not be published.

Mr Ceri Williams

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**

The consultation paper agrees that some 11% of accidents are "caused" by exceeding the speed limit or speeding inappropriately. This is supported by the largest single piece of research carried out by IAM published in 2016. This means that 89% of accidents are caused by other factors. The IAM research put the largest single cause (69%) as driver inattention and advocated training and refresher courses as a possible way of combating this. I am concerned that the Parliament is concentrating on the wrong issue-speed, in light of the published research and by doing so is wasting public resources on an exercise that may have little or no effect. In saying so I am not condoning any action that may result in pedestrian injury, but to introduce a blanket reduction in speed may not be the best use of resources. There is also research that shows that the average speed at which car to pedestrian accidents occur in an urban setting is 12mph. This may indicate that a general reduction in speed to 20mph may have no effect on the numbers of accidents that occur. As to pollution, it seems that the argument in the consultation document offered may have flaws that have to be taken into account. A vehicle travelling at 20mph may generate more pollution over time than a vehicle travelling at 30mph. Of course the worst pollution is a stationary vehicle with its engine running and the pollution generated by a crawling vehicle would only be slightly less. A vehicle travelling at 20mph and covering 20 miles would emit pollution for one hour. The same vehicle traveling at 30mph covering 20 miles would only emit pollution for 40 minutes. It follows that a blanket reduction to 20mph might actually cause more urban pollution, rather than less. In any event, vehicles are not the largest polluters. Research seems to indicate that passenger car traffic accounts for around 5% of global pollution. The Parliament may find there is a better use of resources by concentrating on the polluters that account for the 95% of emissions- agriculture and industry for example, rather than targeting the motorist, given that banning the use of cars would have little effect on overall pollution.

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**

Local Authorities already have powers to restrict speed in targeted areas and at certain times- around schools generally and at school arrival and leaving times for instance. It should be left to local knowledge to decide where a reduction in speed would be most beneficial.

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

I don't think this proposal has any advantages

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

It would increase pollution.

It would frustrate drivers who would be forced to travel at 20mph which may be an inappropriate speed on some urban roads. A frustrated driver is a dangerous driver and accidents may increase as a result.

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.

We need less distracting signs in our urban landscape not more, given that driver inattention (reading signs perhaps) is the largest causes of accidents.

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.

Bad driving should be the focus of Police enforcement not a strict concentration on an artificial speed limit that does not enhance safety.

## 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               |                              |                       |                      |                        |                               |        |
| Police Scotland     |                              |                       |                      |                        |                               |        |

**Please explain the reasons for your response**

Scottish Govt would expend scarce resources on the measure and would have to mount an advertising campaign at the very least- offset by the revenue raising that fines will give. Local authorities would have the expense of signage at least. Motorists would have to spend more on fuel as their journeys would take longer.

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

If there are benefits they will be outweighed by the disadvantages

## 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**

I don't see any impact on these groups

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

*No Response*

## 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:**

I have already explained the economic and environmental impacts. I doubt is the measure can be effectively policed without significant resources being applied.

## 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?

This is a knee jerk simplistic reaction to a complex problem. More effective alternatives exist and have been trialed and found to be successful in other countries. One thinks of the Skandinavian countries that have removed street signage and pavements, essentially pedestrianising roads so that drivers and pedestrians have to pay more attention, leading to safer travel.