

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 If you choose the second or third option, a name is still required, but it will not be published.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

Partially 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 speed limit should be specifically targeted to the type and use of each individual road. A blanket reduction is unnecessary and the excuse that it will be healthier is simply not true. The vast majority of engines are significantly less economical and produce higher emissions at 20 mph vs 30 mph because they were not designed for persistent 20 mph running. Air quality, far from improving, will be significantly worse. There are places where the air quality has to be sacrificed for speed related safety, especially in busy city centres and near schools but, equally, there are roads where 30mph is more than safe and where a reduction in air quality should be avoided.

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

Unsure

**Please explain the reasons for your response**

See my answer to question 1. The bill should not be brought forward in the first place. Instead, common sense should be applied to speed limits on a road by road basis.

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

Given that most areas that would benefit from a 20mph limit already have one, I see no advantage in forcing this restriction on all roads. It makes little sense and will drastically reduce air quality.

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

As said before, at 20mph, most vehicles are significantly less economical and, as a result, will have significantly increased emissions resulting in a drop in air quality.

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.

I don't! It's an unnecessary and Draconian solution which will cause more harm than good.

## 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

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

<b>Local Authorities</b>	X					
<b>Motorists</b>	X					
<b>Other</b>						X
<b>Police Scotland</b>						

**Please explain the reasons for your response**

There will be a significant increase in local authority costs as every street signs would need replaced. As for motorists, driving around at 20mpg is remarkably uneconomical and is going to significantly increase fuel costs.

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**

The bill will have no specific effect on such groups. They will be as equally affected as people that aren't in the groups and the question is completely irrelevant!

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

Another irrelevant question!

## 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 know you have to ask these questions to tick some box somewhere but, seriously, the buzzword

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?

"sustainably" is massively overused already. It will have a negative effect on the environment whether the Bill is delivered "sustainably" or not!

## 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?

I would only ask whether anybody actually thought this through! Have studies into the effect on fuel economy at 20mph vs 30mph, or the emissions increase? Because it took me 3 seconds on Google to find this:

[http://www.theaa.com/public\\_affairs/news/20mph-roads-emissions.html](http://www.theaa.com/public_affairs/news/20mph-roads-emissions.html)

And if you read on you will note that the Departments Of Transport and the Environment looked into and rejected these proposals 17 years ago because of the adverse effects on all emissions, especially CO2.

The Centre for Transport Studies, Imperial College London did a survey in their home city to estimate emissions differences between 20 and 30mph zones and they found that NOx levels, which are by far the most harmful of the tailpipe emissions, rose by 7.9% in the 20mph limits. They only considered light goods and passenger vehicles, however, and failed to study HGVs and buses so this level could be significantly higher. In case you're not aware of what NOx emissions do, they're the ones that kill tens of thousands of UK citizens every year:

<https://www.newscientist.com/article/dn28245-nitrogen-oxide-is-not-so-harmless-and-could-damage-human-health/>

Do we really want to increase those levels by another 7.9%, probably more?