

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 If you choose the second or third option, a name is still required, but it will not be published.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

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 speak as a member of the Institute of Advanced Motorists (IAM), holding their Skill For Life qualification, and as a pedestrian, cyclist, and motorist.

My experience of 20 mph zones is that they are completely ineffective in reducing traffic speeds. There is widespread flouting of the limit, as shown by your own figures in the consultation document (average speed in a 30 zone = 31 mph, in a 20 zone, 25 mph). The only drivers who are likely to take the new limit seriously are those that will already be driving in a considerate and responsible manner.

You cite the studies of Hull, Humberside etc. This is selective reporting, and not even close to an objective literature review. There are several other studies notably among them that of Portsmouth, which has seen no statistically significant decrease in speeds or the KSI rate either in absolute or relative terms, despite a similar blanket 20 mph speed limit. This is a report of some renown in the speed limit debate. The complete omission of this study from the consultation document casts serious doubt on the objectivity of the proposal and the motivations of the proposing party.

Your own figures show that the reduction in emissions is not guaranteed. On a quantifiable, practical analysis, you may assume that the average engine speed of a vehicle travelling through a 20 limit will be the same as that when travelling through a 30 limit, as a best-case scenario. The driver will use a lower gear for the lower speed I.E. the same number of ignition cycles per minute (rpm). The difference is that the transit time, on average, will be 50% longer. In order to lead to a reduction in emissions, more than 33% less fuel must be burned to cover the same distance at the same number of ignition cycles; ergo, the laws of physics must be defeated. This is borne out by your published figures for petrol engines (no benefit). For Diesel, the characteristics of the engines permits a higher gear to be used so a benefit is seen, but (i) this will be eroded by the need to speed up and slow down for traffic calming measures and (ii) the diesel case is likely to be diminished over time as consumer preference swings back to petrol after some years of dominance of diesel, as a result of misguided central government policy.

On a philosophical level, I question the motivation behind this proposal. You talk of a desire to reduce the Kill rate to 0 in Scotland and to reduce the SI rate significantly. However, there is no definition offered for 'significantly' and there is no mention of how Scotland and the UK in general stand in relation to peer group countries. It's a bit like me saying 'I should be paid loads of money'. Well, OK, but what is 'Loads of money' and what is the justification when considered against other people in similar jobs? Clearly every injury is a tragedy for the loved ones of those involved, but in the wider context, i.e. of a city, a county, a country, what difference does it make if the KSI rate falls slightly?

Taking this point to the next level, is the cost associated with achieving a given reduction in KSI (the cost of consultations, surveys, the physical realisation: new signage, street furniture, traffic calming and enforcement) better value for society as a whole than spending an equivalent amount on other services such as social care or neighbourhood policing? Personally I would accept a 10% rise in the KSI rate, and the attached risk that I may be one of the 10%, if it meant more Police patrols on the streets, or on the roads.

You talk of vulnerable groups being at highest risk from injury, and mention in particular pedestrians. I agree. The main problem with pedestrians is that increasingly they do not look where they are going and are frequently distracted by having earphones in or having a mobile phone glued to their face. Reducing the speed of vehicles will not have a substantial effect on this type of accident. We are all custodians of eachothers' safety but it does seem somewhat foolish to perpetuate the idea that pedestrians, and for that matter cyclists, should not expect to take reasonable care for their own wellbeing. If you cut yourself while slicing an onion, is it your fault for not paying enough attention, or the onion's fault for being round, or the knife's fault for being sharp?

I strongly feel the entire proposal is ill-thought through on just about every level. I am not convinced that it will achieve its stated objectives or that it will deliver value for money to the taxpayer, who, after all, will have to pay for it.

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**

A general increase in the number of Police including skilled, trained, experienced Traffic Police on the roads A rise in speed limits in appropriate areas to better reflect the actual speeds used. Many studies, which you can find as well as I via your favourite search engine, have shown that best compliance with the limit is achieved when the limit is set at about 85% of the natural unlimited speed of the road. YOur own figures have demonstrated that reduced limits are universally flouted. A concerted public information campaign aimed at improving the behaviour and awareness of all road users, including pedestrian and cyclists.

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

There are no quantifiable or justified advantages to this proposal.

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

Drivers will have an increased level of contempt for the authorities. They will question the validity and relevance of posted speed limits, and discipline and tolerance on the roads will be further lost.

Drivers will become frustrated at being forced to travel at slower speeds than are necessary, especially at off peak times; my experience has been of less considerate drivers carrying out ill-advised overtakes in low speed limit areas.

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.

Police guidelines are that they will not enforce 20 mph speed limits, and these should be self-enforcing. The only measures are traffic calming and engineering controls.

In my experience, speed bumps are totally ineffective at enforcing 20 mph speed limits. The only drivers that observe them are those that have mechanical sympathy, and these are as a rule the drivers that are naturally driving to the conditions anyway; speed bumps do nothing for the school run mum in her SUV, late for the drop off / pick up; nothing for the white van man or sales rep dashing to his next appointment and nothing for the delivery driver who just wants to get his 100 drops done and go home for a cup of tea.

To enforce a 20 mph zone effectively you must narrow the roads with physical barriers, which in itself carries risks - that of collision with other road users or street furniture, and makes passage for the emergency services more difficult. Perhaps you will save a couple of serious injuries per year per county, but if there is a serious fire, other people may be killed waiting for the fire brigade or ambulance to navigate the traffic calming schemes.

Is there really a tangible, quantified benefit in this proposal?

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**

Local Authorities will end up paying to implement the proposals. Motorists will be targeted by enforcement bodies, inevitably more will be issued PCNs. Other road users will not be financially affected. The Scotch government may or may not choose to subsidise the LAs for implementation; there may or may not be an effect on GDP or tax revenue through productivity movement.

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

I have already stated that there are no quantifiable benefits to this proposal.

## 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?

Negative

**Please explain the reasons for your response**

It will have no effect whatsoever on anyone who does not depend on a car to get around. Of those groups mentioned, the elderly, disabled, pregnant, infirm and those with young children are most likely to use private motorised transport, and as such will be disproportionately affected by the proposals. I do not see how being married, gay or of a particular religious persuasion has any relevance here.

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

Yes. The bill could be dropped with immediate effect.

## 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

## 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 Response*