

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 If you choose the second or third option, a name is still required, but it will not be published.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

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 benefits of a 20mph speed limit, in terms of accident number reduction, accident severity reduction, casualty reduction and encouragement and facilitation of walking and cycling, arise from actually having traffic travel at a low speed. Merely changing the signed speed limit is not going to deliver a significant change in vehicle speeds on the roads affected by this proposal, and therefore the objectives of the proposal will not be fully realised. This proposal will result in tremendous effort in creating 20mph limits where there will be little or no benefit and widespread non-compliance. In turn the latter will lead to increased calls for enforcement. There will also be a danger of a "job done" mentality, particularly from politicians, but where the benefits are not realised and the opportunity to achieve them by introducing 20mph speed limits and supporting measures which actually deliver lower speeds has been missed. The consultation is also misleading in that it suggests in places that it will apply to all residential roads - that is not the case. A and B class roads will remain at 30mph unless Orders are promoted. Therefore the "mixed message" of different speed limits on ostensibly the same type of road will remain. The use of "residential" is also too sweeping. No doubt it is appropriate for dense housing estates in major towns and cities, but this proposal will apply equally to roads passing through small towns and villages which have an entirely different characteristic. There are ample issues of concerns about non-compliance with the current 30mph speed limit in these communities. Application of a 20mph limit will only exacerbate that, and Police Scotland do not have the resources, or do not see it as a sufficiently high priority, to undertake any degree of enforcement - speed limits need to be self evident and self enforcing to be of benefit and without creating undue issues for Councils or Police Scotland. You say in your forward that local authorities, working with communities, are best placed to make judgements about which roads may need to be exempted from a 20mph default limit (which is only the default on C and U class roads anyway). On this basis surely local authorities are best placed to determine which roads should have 20mph speed limits, or what their overall priorities are. We should be learning from the errors of the introduction of Police Scotland and its "one size fits all" approach, avoiding that mistake and enabling decision making and delivery at a local level.

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

Increased funding and resources to deliver 20mph speed limits in line with current guidance, where the aim is to have 20mph limits with traffic travelling at that speed. Direct this at locations where the benefits will actually be realised and roll out in a more managed way. This would better reflect the available resources at Council and national level. Providing specific, ring fenced, funding from central government and agreeing delivery targets with authorities that want to put in place 20mph speed limits.

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?

The one size fits all approach, rather than allowing local authorities to determine where 20mph speed limits are appropriate, or indeed if they think that is the best way to achieve the desired objectives in their area.

Large extents of road where the actual speeds will bear little resemblance to the posted speed limit.

Because the proposal would come into effect nationally there would be a huge demand for staff to

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

determine, manage and implement changes, even without any review of appropriateness or otherwise. Even something as simple as the supply of signs would see huge demand and costs escalate because of supply and demand. If authorities were to undertake reviews of appropriateness or consider whether a 20mph limit should also extend to A and B class roads then there just are not the professional resources and funding available to undertake this, particularly in smaller authorities and in authorities with more diverse road networks, compared to authorities primarily covering urban areas.

Increased calls for Police enforcement, which will not be provided and therefore increased dissatisfaction with what Councils and the Police do.

Politicians move on to something else, thinking they have done something constructive, when actually all that will result is increased problems and a huge opportunity missed to actually achieve the objectives of a 20mph speed limit.

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.

Extensive, long running campaigns on the lines of drink driving and seat belt campaigns to try and change ingrained behaviour. Drink driving campaigns have run for years, but still a significant issue.

Provision of physical measures to engineer speeds down - either traffic calming, streetscape alterations or investment in walking and cycling to significantly increase their modal share.

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 in terms of national campaigns to alter driver behaviour and fund delivery at the local authority level. Local Government - huge workload when budgets already hugely reduced and staff resources cut back significantly. And across the country all at the same time. Diversion of resources from other areas, e.g. road maintenance and therefore reduction in service levels. Motorists - additional journey time and fuel costs. Others - taxpayers ultimately pick up Government 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?

Positive

Please explain the reasons for your response

Increased benefits to pedestrians and cyclists and the disabled by increased ability to travel safely.

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

No obvious negative impacts.

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:

The "all at once" approach of this proposal is the complete opposite of a sustainable approach. Far better to undertake this over a period of time, starting with locations where the greatest benefits will arise. Significant ongoing costs for behaviour change activities. Increased road maintenance burden.

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?

An increase in 20mph speed limits is appropriate. However it needs to be achieved in a holistic way and where the benefits it seeks to provide (increased road safety and modal shift to walking and cycling) are actually delivered and where it doesn't create future burdens and leave Council's and Police Scotland trying to defend the indefensible.

A more focused approach on bringing about changes that actually achieve lower speeds and where they are most beneficial would be better. And one that can be delivered in a sustainable manner, in terms of funding and resources, but where there is a real commitment, backed up by specific funding, to work

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towards far wider provision.

The overall objective is appropriate but the way proposed is far too simplistic, doesn't take into account the wide range of roads which exist in urban areas (i.e. where there is a 30mph speed limit at present), doesn't take into account A and B class roads, the huge workload that would result and doesn't take into account the resource requirements, in terms of staff, materials and funding.