

Proposed Restricted Roads (20mph Limit) (Scotland) Bill

Page 2: About you

Are you responding as an individual or on behalf of an organisation?

on behalf of an organisation

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".)

No Response

Please select the category which best describes your organisation

Third sector (charitable, campaigning, social enterprise, voluntary, non-profit)

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 If you choose the second or third option, a name is still required, but it will not be published.

Alliance of British Drivers

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 ABD believes there is no justification for a blanket reduction in the restricted roads speed limit from 30 to 20mph. Speed limits only benefit road safety if they are set at a level that the majority of responsible drivers consider to be reasonable. In practice this means setting them at the 85th percentile level, i.e. the speed that only 15 per cent of drivers would wish to exceed anyway. Speed limits set below this level create conflict between those drivers who always obey the limit even if they disagree with it, and those who wish to maintain a reasonable, safe speed that has arbitrarily been deemed to be illegal. This leads to frustration which can manifest itself in ways such as tailgating, dangerous overtaking and road rage. Those drivers who seek to adhere to an unreasonably low speed limit find themselves having to check the speedometer more frequently, which is consequently an unnecessary distraction from the more important tasks of hazard perception, assessment and response. Where measured speeds are already at or below 20mph, reducing the limit may be acceptable but is unnecessary. Where speeds are above 20mph, a reduced limit is unlikely to lead to significant falls in actual speeds, as has been found in many parts of the UK. At the same time, the reduced speed limit may induce complacency in vulnerable road users such as pedestrians and cyclists, who think speeds will be reduced much more than has occurred in practice, so they take less care. While local authorities would be able to raise the speed limit on selected roads back to 30mph, the ABD fears this will not happen in many cases, leading to major traffic routes having an unnecessary 20mph limit that will be widely ignored. This would give the police and speed camera partnerships the opportunity to catch large numbers of drivers travelling at safe but illegal speeds. The result would be to antagonise the driving public from the police. The ABD is concerned that the pressure for a reduced speed limit on restricted roads is driven by organisations and lobby groups that are more concerned with social engineering than road safety. They are often ideologically opposed to private motorised transport and wish to force people to walk, cycle or use public transport instead. They see reduced speed limits as a means to achieve this. The ABD therefore wishes the 30mph restricted roads speed limit to remain, with 20mph limits imposed on individual roads where conditions warrant a lower limit, and after everyone affected, including drivers, is given the opportunity to have their views heard.

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 stated in answer to the previous question, a blanket reduction in the restricted roads speed limit is not warranted or acceptable. Where 20mph speed limits on specific roads are being considered, they should continue to be subject to the statutory procedures that apply to the setting of local speed limits, including consultation with drivers as well as residents, emergency services, etc. This may be time consuming and inconvenient for local authorities, but it is the only way to ensure that speed limits are acceptable to all road users.

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

The only advantages would be to anti-car pressure groups. There would be no advantages to road users.

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

The proposal would be likely to lead to a widespread lack of respect for speed limits in general, not just the restricted roads limit. Safety is unlikely to be enhanced and could actually worsen, as road users become complacent about assumed speed reductions that do not take place. Many more drivers would be punished for exceeding an unjustifiably low speed limit. Road transport would be slowed unnecessarily, with increased economic costs.

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.

To ensure compliance with a 20mph speed limit on roads where most drivers consider 30mph to be safe would require draconian levels of enforcement that are not acceptable in a democratic society. Laws need to command the respect of the majority of the public. A national 20mph restricted roads speed limit would not command that respect.

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

If this bill were enacted, there would likely be some reduction in costs to local authorities as they would no longer need to sign 20mph speed limits on individual roads, although they would have to sign those roads with local 30mph limits. The biggest losers would be motorists, whose journey times would be increased and they could also fall foul of police enforcement if they continued to drive at the safe speeds they have been accustomed to.

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

The ABD does not believe there would be any benefits at all, other than the satisfaction of the pressure groups advocating the change.

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)

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?

Please explain the reasons for your response

There is no reason to believe that these groups would be affected any more or less than society in general.

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

Not applicable.

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:

There would be economic and social impacts for drivers expected to travel more slowly than is necessary for safety, including travel time costs, fuel costs (from travelling in a lower gear), and possible fines, speed awareness course fees or driving bans (for repeat offenders) for those caught exceeding an unnecessarily low 20mph limit. The environmental impact is likely to be negative, as drivers would be travelling at least one gear lower at 20mph than at 30mph, with the result that a car's engine would complete more revolutions per mile travelled. Catalytic converters would be less likely to reach the temperature needed to work effectively at the lower speed, so they would not clean up exhaust emissions as well.

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?

For the reasons given in answer to the previous questions, the ABD considers this proposal to be flawed and should be abandoned.