

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

Public sector body (Scottish/UK Government/Government agency, local authority, NDPB)

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 If you choose the second or third option, a name is still required, but it will not be published.

Aberdeenshire Council

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.

Neutral (neither support nor oppose)

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 decision on whether or not to go ahead with this proposal is a political one. This response is not expressing a political view on the proposal but is a technical response by council officers with experience in the field aimed at ensuring that the decision is based on full and accurate information.

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

No

Please explain the reasons for your response

If there were to be a widespread increase in the proportion of roads subject to a 20 mph speed limit, a change in the national default position for restricted roads as envisaged in this bill would be preferable to a piecemeal approach. It would give greater consistency, lower overall implementation costs and less additional sign clutter. It may be worth putting forward an alternative option for consideration whereby the definition of a restricted road would be narrowed to comprise only unclassified roads within areas of street lighting. C class roads in built up areas are likely to act as distributor roads and so maybe more logically grouped with A and B class roads than with unclassified roads to achieve consistency based on function. Either option would result in a default 20mph limit on the vast majority of housing roads. In Aberdeenshire, roughly 12% of the restricted roads are C class roads and 88% are unclassified roads.

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

It is likely that there would be a small reduction in average speed of between 1 and 2 mph and a corresponding reduction in accidents in the roads affected.

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

There would be an increase in sign clutter and the proposal would increase the proportion of people routinely exceeding speed limits which could lead to a reduction in their credibility and enforceability. There would be a small increase in journey times.

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.

There would need to be a national publicity campaign at the time of implementation of any new national speed limit. This could benefit by being undertaken in conjunction with a high visibility police enforcement exercise.

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

The Scottish Government would need to fund a publicity campaign and probably provide additional resources to Police Scotland for enforcement. Local Authorities would need to provide new signing and promote some new traffic orders. If the measure were to result in a reduction in accidents, then society as a whole would benefit from the reduction in the associated costs.

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

It may help to increase the confidence of pedestrians and cyclists on urban roads.

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)

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?

Yes

Please explain the reasons for your response:

There would be an increase in sign clutter but not so great as to warrant the description of disproportionate.

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?

The background information in the consultation document is misleading or incomplete in some respects. It is recommended that the following comments should be taken into account in future consideration of the proposal:

1. The following statement appears on page 4: "A department of Transport fact sheet from 2016 states that the average speed of cars and light commercial vehicles (LCVs) in a 30mph area is 31 mph while the average speed of cars and LCVs in a 20 mph area is 25mph. Therefore, as a result of this proposal, we could expect to see a reduction in speed of around 6mph." The first sentence is correct. However, the inference in the second sentence is not. Existing roads with a 20mph speed limit will primarily be those where traffic speeds and features comply with the current guidance for imposing such a limit. Existing roads with a 30mph limit will primarily be those that do not comply with these requirements. A direct comparison cannot, therefore, be made. The studies on comparable measures, some of which are cited elsewhere in the consultation document, generally indicate a reduction of between zero and around 2 mph.

2. The following statement appears on page 6: "Restricted roads are defined as roads which are lit by street lights that are not more than 185m apart." Restricted roads are actually defined as C class and unclassified roads which are lit by street lights that are no more than 185m apart. In addition, local authorities have historically made some traffic orders making some other roads restricted roads. This type of order is no longer recommended but some such orders would need to be revoked. A and B class roads in urban areas are not restricted roads by default and have their speed limit imposed by a traffic order.

3. The following statement appears on page 22: "By contrast, a national 20mph speed limit would require signage only on those roads that would be designated as 30 mph through a TRO - roughly 20% of roads in an urban area. Based on a cost per head of population calculation for this measure, the total would be £4.3m." Whilst it is true that roughly 20% of roads in an urban area would be designated as 30mph, the signage cost cannot be calculated pro-rata. Based on figures for Aberdeenshire, roughly 40% of the signs would be terminal signs between the 20mph and 30mph roads and 60% would be repeaters within the 20mph roads. The terminal signs would be required anyway, so the pro rata reduction should only be applied to the repeaters. This would mean that the number of signs with a 20mph default would be roughly 55% of the number with a 30mph default. If you accept the figure of £17.2 million in the consultation document for the Scotland wide cost of signage with a 30mph default, then the equivalent cost with a 20mph default would be £9.5m. This is a reduction, but not as great as that to £4.3m quoted in the consultation document.