

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 If you choose the second or third option, a name is still required, but it will not be published.

Neil Greig, Director of Policy, IAM RoadSmart

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**

IAM RoadSmart accept that reducing speeds is directly linked to lower severity of injuries to vulnerable road user groups. However we remain sceptical that a blanket approach will have the fully desired effect that the Bill suggests. Dft research suggests that drivers take their speed cues from the road environment around them. Reducing the default speed limit will have no effect on the physical infrastructure. Roads that look and feel safe to drive along at 30 will remain exactly the same. In our view scarce resources should be targeted at engineering and other physical improvements that make it clear that 20mph is the best speed to be driving at. Widespread enforcement of 20mph on already safe roads may lead to a loss of support for the measure when it is used in the correct locations. For example support for 20mph outside schools is very high but this tails off elsewhere - see our survey below. Our survey suggests that most drivers see enforcement of 20mph as a low priority best achieved by a 20mph speed awareness course. Such courses do not exist in Scotland yet. Roads with high flows of pedestrians and cyclist should be targeted for 20mph first. In European countries it is clear what the limit should be due to design features, shared surfaces and segregated cycle paths. Our main concern is that this measure is diverting resources away from creating a safe system based network of segregated cycle paths and other facilities for vulnerable road users Our survey can be found here <https://www.iamroadsmart.com/media-and-policy/research-and-policy/research-details/20mph-survey-drivers-opinions-of-20mph-speed-limits>

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**

Through targeting of resources at those roads with an accident problem and by investing in shared surfaces and other engineering alternatives. Scotland's roads have never been safer and pedestrian accident are at historic low levels. IAM RoadSmart support the 'Safe System' approach which recognises that human beings cannot withstand collisions above certain speeds. Reducing speed can assist in this respect but a car or lorry should not be sharing the same space as a more vulnerable user

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?

Confusion on the part of drivers

Widespread ignoring of a 'law' leading to loss of support for its enforcement

Economic and environmental benefits are not fully proven

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.

A seed limit should be self explaining via the character of the road - any recourse to additional signage is wasteful, intrusive and unlikely to work

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.

The police need to have the option of sending offenders on a speed awareness course - we believe education is better than enforcement

## 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**

More research is need on the environmental benefits of lower speed in already congested cities. Congestion costs do not appear to have been calculated in the Bill The impact on journey time reliability is unknown

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

Only in specific areas with a known accident problem or as part of an area wide environmental improvement scheme

## 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?

Unsure

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

Not known

## 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?

Unsure

**Please explain the reasons for your response:**

The effect it will have on different parts of a city or on towns of different character remains unclear

## 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?

None