*Livingston Village Community Council*

Mark Ruskell MSP

Room MG . 17

Scottish Parliament

Edinburgh

EH99 1SP

5th July 2017

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

On behalf of Livingston Village Community Council I submit this letter with our comments on the above proposed bill as requested by you on 16th May 2017.

We shied away from the loaded on line questionnaire and decided to list some comments as below. These are in no particular order of merit nor preference.

We do appreciate that, as the old adage says, “ *speed kills”* but we found such a variety of opinions and comments that it was very difficult to get a single opinion representative of all our residents on yes (for) or no(against) the proposal to reduce the default speed limit from 30mph to a 20mph nationally.

We acknowledge that lower speeds reduce traffic injuries and could reduce the accident statistics.

A blanket change in our view is far too general especially for older town and city layouts where residential and main traffic routes are so intertwined and lowering the existing limits would contribute to more crawling traffic and bottlenecks.

The geometry of our urban spaces is exceedingly varied and complex and therefore requires a local individual approach rather than a global generality.

We agree that for wholly residential areas, ie 100% housing estates, that do not have through routing then 20mph should apply.

We agree that for schools and an extended area around schools then 20mph should apply. The school safety zone radius should be increased from the current 300 m. This may require serious thought to road layouts in school vicinities where main routes are close by.

We disagree with the suggestion that cycling and walking would increase because of lowered speeds. These are really unrelated and any increase in such healthy modes of regular transport could not be attributed as a direct consequence of the 20mph limit. Segregation of walkers and cyclists from vehicular traffic is the only sure way of increasing safe active travel. All the space allocated on pages 8 and 9 to *maintaining a healthy weight* seems inappropriate and irrelevant to the case.

Emissions and pollution generated discussion. The table on page 10 indicates that 2 out of 3 pollutants for petrol engine vehicles is worse at 20mph. So the case for 20 is not proven on this aspect. There is a trend away from diesel engines for cars so a natural reduction should occur for their contribution to emissions.

Many of the worst polluted streets are where traffic is slow and concentrated, ie St John’s Road in Corstorphine. So even at lower speed the length of time for a vehicle in a given distance could be pumping out as much pollutant as a faster vehicle there for a shorter time.

We left the inequality topic since none of us had enough knowledge to make a sensible comment. Other than - it would appear deprived areas are more likely to have a higher number of pedestrians roaming about thus the casualty statistics could skew upward.

No mention is made as to what changes if any would be made to urban roads that currently have 40 mph limits. It would be nonsensical to reduce these to 20 mph since in the main these are busy main artery routes and need the higher limit to try and keep high volumes of traffic flowing.

If 20 mph did replace 30 mph we consider that some councils would not bother to consider increasing some roads back to 30 mph.

There are many references to data from parts of England – considering you have included (Scotland) in the Bill title there seems little to merit in padding out the bill paper with Southern information.

We imagine it is a very difficult accounting task to get anywhere near reasonably accurate cost estimates. So we treat the quoted costs, scheme differences and financial implications with extreme caution. Budget estimating has never been a government strong point.

There are several references to the complex, costly and time consuming procedure required to change roads from the current 30mph down to 20mph. Rather than attempt to get a national blanket change that does nor suit all conurbations why not pass some law or whatever to simplify the procedure and adopt that leaving the national limit at 30mph.

Policing and enforcing the current 30mph roads for speed compliance is not particularly good so we consider that for 20mph speed compliance will be even worse and the overstrained Police Scotland can have little chance of dealing with the potentially very large volume of breaches of 20 mph.

Speed bumps are useful for slowing traffic but the vast number of sizes and types is incredible. There should be a national standard for sizes, materials, shapes and spacings. This standard should also allow for the needs of emergency vehicles.

The table on pages 16 and 17 show a complete miscellany of actions by different councils from virtually nothing to the extensive attempt by Edinburgh. Some councils never responded so they would seem to have no interest in the subject. Some sort of national Scottish policy would appear to be necessary to get some sort of coherent and consistent action – but a global 20 mph is not right.

We submit the above as comments and trust they will get some consideration from the relevant staff dealing with this consultation.

We agree and are content that this response can be attributed to tour organisation – Livingston Village Community Council. You may contact us via our Chair at

**In summary we land in the category of “partially opposed” with some element of “unsure”**

Yours faithfully

Chair

Livingston Village Community Council