# QUESTIONS

## SECTION 1 - ABOUT YOU

 **1. Are you responding as:**

* an individual – in which case go to Q2A
* on behalf of an organisation? – in which case go to Q2B

### 2A. Which of the following best describes you? (If you are a professional or academic whose experience or expertise is not relevant to the proposal, please choose “Member of the public”)

* Politician (MSP/MP/Peer/MEP/Councillor)
* Professional with experience in a relevant subject
* Academic with expertise in a relevant subject
* Member of the public

 **2B. Please select the category which best describes your organisation:**

* **Public sector body (Scottish/UK Government/Government agency, local authority, NDPB)**
* Commercial organisation (company, business)
* Representative organisation (trade union, professional association)
* Third sector (charitable, campaigning, social enterprise, voluntary, non-profit)
* Other (e.g. club, local group, group of individuals, etc.)

1. **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
	+ I would like this response to be anonymous (the response may be published, but no name)
	+ I would like this response to be confidential (no part of the response to be published)

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 If you choose the second or third option, a name is still required, but it will not be published.**

**Name/organisation:** Stirling Council

1. **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.)**

**Contact details:**  Stuart Geddes –

**SECTION 2 - YOUR VIEWS ON THE PROPOSAL**

## Aim and approach

1. **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 supportive
	+ **Partially supportive**
	+ Neutral (neither support nor oppose)
	+ Partially opposed
	+ Fully opposed
	+ Unsure

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

The desire to reduce vehicle speed on streets where vulnerable users interact with vehicles is understandable for the potential improvements in health, quality of life, safety. However, the predicted effectiveness of a straight swap to a default 20mph without supporting measures is questionable. This is because the speed reductions that the consultation document concludes will result are over stated. Quite a leap is made in a statement made in the background to the paper *‘Therefore, as a result of this proposal, we could expect to see a reduction in speed of around 6mph’*. Available research tends to suggest much more modest reductions can be expected from sign only speed limit changes – meta analysis of OECD/ECMT data suggests *‘In places where speed limits have changed and no other action is taken, the change in average speed is about 25% of the change in speed limit’* (Speed Limits A review of evidence, Box and Bayliss, RAC Foundation, London, 2012). This equates to an expected reduction in speeds of 2.5mph from the measures suggested in Bill, significantly less than the 6mph assumed.

The report also confuses evidence from studies into the effectiveness of 20mph zones and the effectiveness of 20mph limits. To the uninitiated these are probably assumed to be the same. However, 20mph zones enforce lower speed limits through the use of mandated speed reducing features spaced no further than 100 metres apart. 20mph limits predominantly use signs and road markings only, in association with a traffic regulation order. It would be very unusual not to record large reductions in vehicle speeds in 20mph zones, while it would not be unusual to record small reductions with sign only 20mph speed limits. The Kingston upon Hull analysis quoted was promoted as a mass action accident remedial scheme using traffic calmed 20mph zones. It was targeted at areas with high numbers of pedestrian accidents and was very successful, so one would also expect significant reductions in accident numbers and frequency. This is quite different from what is proposed. Combining these two, quite different types of speed limit, risks overstating the potential effectiveness of the proposal.

I do not think these problems are insurmountable, but it would be naïve to expect an immediate improvement in all situations, or improvements on the scale suggested without support where it is required.

1. **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)
	+ **No**
	+ Unsure

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

Any other method is likely to result in a piecemeal approach rather than a co-ordinated nation implementation, if national rollout of 20mph speed limits as the default speed for residential streets is decided upon.

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

There should be ‘quality of life’ improvements on streets where the speed of vehicles decreases, accompanied by a reduction in accident severity. It would be unusual for residential streets to have a high accident rate and not to already have been treated by some means or another, so reductions in numbers of accidents may be smaller than expected. If speeds can be reduced on roads with large numbers of interactions between vulnerable users and vehicles (shopping areas, high streets, etc.) there should be a reduction in accidents. Likewise accident frequency and severity may be reduced if speeds can be significantly reduced on roads that currently serve a distributor function and have adjacent pedestrian movement generators.

1. **What do you think would be the main disadvantages, if any, of the proposal?** Realistically, the proposed national speed limit will be largely complied with only where the environment is suitable. Research and experience shows that it is unrealistic to expect wide spread compliance or even significant speed reductions where there is a mis-match between environment and speed limit. This has the potential to introduce larger speed differentials than are presently the case, on roads that vulnerable users may already find difficult to negotiate. Larger speed differentials are known to increase the risk of speed related accidents. Vulnerable users who have difficulty judging vehicle speed (e.g. young pedestrians), may be exposed to greater risk of injury as the expectation of approaching vehicle speed may frequently not match actual speed. Available research into the effectiveness of speed limits and drivers’ inclination to speed suggests a ‘one size fits all’ solution will not work without some form of support, be that increased enforcement, environmental change or speed management.

1. **What measures do you think would be needed to maximise compliance with the new national 20mph speed limit on restricted roads? (Examples might include advertising, signage or police enforcement.)** Ensuring that environments match the lower national speed limit. Wide scale application of physical measures required to reduce vehicle speeds where environments do not match the speed limit are likely to be prohibitively expensive and disruptive nationally. Technology based solutions such as vehicle activated signs and speed cameras are unlikely to produce the desired results because of their operational links to the enforcement thresholds and, if this link were broken, the cost of implementation of this on such a wide scale. In-car technology based solutions for example, Intelligent Speed Adaptation (ISA), may be the best option to produce the desired results. Vehicle manufacturers currently provide intelligent adaptations such as sign and road marking recognition, collision avoidance, etc. Whether a workable ISA system could be provided in the short term using similar technology should be explored, but ultimately, a GPS or similar location based system would be the most sustainable. Whether this is industry led or mandated would have to be decided, but introduction to public fleets could be a starting point for the Scottish Road Safety Framework 2009 commitment to consider running a pilot system.

## Financial implications

**6.** **Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have on:**

### (a) the Scottish Government

* Significant increase in cost
* **Some increase in cost**
* Broadly cost-neutral
* Some reduction in cost
* Significant reduction in cost
* Unsure

### (b) Local authorities

* **Significant increase in cost**
* Some increase in cost
* Broadly cost-neutral
* Some reduction in cost
* Significant reduction in cost
* Unsure

### (c) Motorists

* Significant increase in cost
* Some increase in cost
* **Broadly cost-neutral**
* Some reduction in cost
* Significant reduction in cost
* Unsure

### (d) Other road users and members of the public

* Significant increase in cost
* Some increase in cost
* **Broadly cost-neutral**
* Some reduction in cost
* Significant reduction in cost
* Unsure

### (e) Other public services (e.g. NHS, Fire and Rescue Services etc)

* **Significant increase in cost**
* Some increase in cost
* Broadly cost-neutral
* Some reduction in cost
* Significant reduction in cost
* Unsure

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

The proposal will be broadly cost neutral, with the exception of Local Authorities, who manage the vast majority of existing 30mph roads and streets, Transport Scotland who manage the trunk road network and Police Scotland who are responsible for enforcement. The initial costs to change from 30mph to 20mph on local roads will be significant as it will be necessary to remove a large number of existing signs and install new signs on a proportion of roads that are entirely unsuited to the lower national speed limits by virtue of their design standards and/or primary function (e.g. trunk roads, distributor roads). Infrastructure Costs will be expected neutral after the initial implementation.

There will be a greater expectation than present for the Police to enforce speed limits, particularly where compliance is low. From experience, people expect a zero tolerance approach to 20mph speed limits and view speeds a few miles per hour above the limit, that current guidance and professional opinion would deem a success, as unacceptably high.

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

As has been intimated, even modest reductions in vehicle speeds have the potential to reduce impact speed and consequently injury severity.

## Equalities

1. **What overall impact is the proposed Bill likely to have on equality, taking account of the following protected characteristics (under the Equality Act 2010): age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, sexual orientation?**

* + Positive
	+ **Slightly positive**
	+ Neutral (neither positive nor negative)
	+ Slightly negative
	+ Negative
	+ Unsure

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

The proposal could offer great benefits to those who are less likely to use motor vehicles as their main means of transportation, if the desired speed reductions are realised. Those who have difficulty crossing roads should benefit (the very young, the elderly and mobility impaired)

1. **Could any negative impact of the Bill on equality be minimised or avoided?**

## Sustainability of the proposal

**10.** **Do you consider that the proposed bill can be delivered sustainably, i.e. without having likely future disproportionate economic, social and/or environmental impacts?**

* Yes
* No
* **Unsure**

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

* There may be ongoing resource problems for the Police if the sign-only approach is followed. This will either result in insufficient enforcement or diversion of resources from other important Policing duties.

## General

**11.** **Do you have any other comments or suggestions on the proposal to establish a 20mph default speed limit on restricted roads?**

The desire to reduce vehicle speed on streets where vulnerable users interact with vehicles is understandable for the potential improvements in health, quality of life, safety. However, the predicted effectiveness of a straight swap to a default 20mph without supporting measures is questionable. This is because the speed reductions that the consultation document concludes will result are over stated. Quite a leap is made in a statement made in the background to the paper *‘Therefore, as a result of this proposal, we could expect to see a reduction in speed of around 6mph’*. Available research tends to suggest much more modest reductions can be expected from sign only speed limit changes – meta analysis of OECD/ECMT data suggests *‘In places where speed limits have changed and no other action is taken, the change in average speed is about 25% of the change in speed limit’* (Speed Limits A review of evidence, Box and Bayliss, RAC Foundation, London, 2012). This equates to an expected reduction in speeds of 2.5mph from the proposed Bill, significantly less than the 6mph assumed.

The report also confuses evidence from studies into the effectiveness of 20mph zones and the effectiveness of 20mph limits. To the uninitiated these are probably assumed to be the same. However, 20mph zones enforce lower speed limits through the use of mandated speed reducing features spaced no further than 100 metres apart. 20mph limits predominantly use signs and road markings only, in association with a traffic regulation order. It would be very unusual not to see large reductions in vehicle speeds in 20mph zones, while it would not be unusual to record little reduction in limits. The Kingston upon Hull analysis quoted was promoted as a mass action accident remedial scheme using traffic calmed 20mph zones. It was targeted at areas with high numbers of pedestrian accidents and was very successful, so one would also expect significant reductions in accident numbers and frequency. This is quite different from what is proposed. Combining these two, quite different types of speed limit, risks overstating the potential effectiveness of the proposal.

I do not think these problems are insurmountable, but it would be naïve to expect an immediate improvement in all situations, or improvements on the scale suggested without support where it is required.