

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 If you choose the second or third option, a name is still required, but it will not be published.

East Renfrewshire 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.

Partially supportive

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**

We are generally supportive of the aims of the Bill but there are a number of detailed points that will inevitably influence the way in which alterations to the speed limit can be implemented, delivered and enforced. We agree that lower traffic speed within residential areas creates the perception of a safer environment where pedestrians & cyclists etc feel less vulnerable and drivers take more cognisance of the speed at which their vehicle is travelling. Also any collision between a vehicle and a pedestrian or cyclist will result in a lower risk of severe injury. However, as experienced with the part time and advisory 20 mph speed limits, the public's expectation of the effectiveness of such a 20mph limit will be great and where the limit is not adhered to there will be subsequent demands on the local authority and Police Scotland to take relevant action. Complaints and requests for traffic calming measures to be introduced will increase and without relevant and significant resources, the Roads Authority may not be able to meet public demand. A 20mph limit legally requires vehicles to travel at speeds below 20mph. However, the Department for Transport, 2016. Free Flow Vehicle Speed Statistics: Great Britain 2015 states that the average speed of cars and LCVs in a 20mph area is 25mph. Therefore, unless the design of the road network is such as effectively to be self-enforcing, this research suggests that it is unlikely that the majority of motorists will reduce their speed to below 20mph. There is a significant number of existing 30mph restricted roads which will not be suitable for a 20mph limit i.e. distributor road, through routes etc. For these routes to have speed limits as existing, will require under present procedures revised Traffic Regulation Orders to be promoted. The identification of potential 30mph routes may be problematic and open to debate, differences of opinion and objection. The process to promote the Order may subsequently be very time consuming, costly and put significant demands on existing resources. As this will apply only to Scotland there may be confusion for motorists understanding what relevant speed limit applies; particularly for cross border traffic and a high profile public awareness campaign will be required.

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**

In addition to any legislative change it is suggested that more resources are made available to local authorities and Police Scotland to allow the 4Es of Road Safety (engineering, enforcement, education & encouragement) to be actively targeted at ensuring that the speed limits are imposed and that drivers are encouraged to drive appropriately to their surroundings. There will be a requirement under current procedures for local authorities to promote Traffic Regulations for all roads which will continue as having a 30mph limit. This process is very time consuming (may be an inappropriate lag between such orders being promoted and the potential introduction of the blanket 20mph limit) and costly and again puts significant demands on existing resources. The identification of 30mph routes may be problematic, open to debate and objection. It may be important to enable local authorities to decide what roads remain 30mph and remove the requirement to have that decision open to the right of objection from the TRO Procedures. In addition to this, to ensure consistency across Scotland, guidance from Transport Scotland would be useful to set out principles for retention of 30mph roads. Co-ordinating and correlating timescales in promoting any 30mph Traffic Regulation Orders and the implementation of the blanket 20mph Order may be problematic and difficult to achieve. If the Bill is passed a period to enable local authorities to react to the changes in legislation should be considered.

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

Where speeds are reduced, there is no ambiguity that this will have a positive effect on driver behaviour, creation of a residential environment where vehicles and pedestrians respect the space and potentially reducing the risk of severity of any conflict.

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

If the Bill is not linked to other road safety initiatives to change the culture of drivers, signing a 20mph speed limit alone is unlikely to be successful.

If the 20mph limit is abused and not enforced on a regular basis it becomes accepted by motorists can travel at speeds above this limit. There will also be increased complaints and demands on local authorities and Police Scotland to ensure that the 20mph limits are imposed. Without relevant and significant resources, these agencies are unlikely to meet public demand.

There may be confusion for motorists understanding what the relevant speed limits are; particularly for cross border traffic.

More mature drivers have the ethos of the 30mph ingrained into their driving behaviour and they will take time to adapt to the new blanket speed limit

There will also be cost implications on the signing and lining of the 20mph/ 30mph limits (including subsequent future maintenance of such).

Monitoring of this initiative (pre and post) would potentially require to be undertaken with subsequent cost and resource implications.

**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.**

Within relevant areas, there may be a requirement for traffic calming/ management features to be introduced (vertical features, change in carriageway alignment, electronic (vehicle activated) signage etc.).

A strong public advertisement campaign would be necessary to "educate" all road users any new speed limit ethos.

Within relevant areas, the potential for average speed enforcement cameras should be considered.

Further development of vehicle speed monitoring systems should be considered including in-vehicle technology.

Stringent enforcement policy across Scotland.

## 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
<b>Scottish Government</b>		X				
<b>Local Authorities</b>	X					
<b>Motorists</b>			X			
<b>Other</b>	X					

Q6. Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have?

<b>Police Scotland</b>						
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**Please explain the reasons for your response**

Scottish Government - cost involved in promoting scheme Local Authorities - significant cost in implementing scheme; long term costs with maintaining increased infrastructure; costs associated with reacting to complaints and introducing traffic calming / management measures where deemed necessary; costs associated with promoting new 30mph orders; costs associated with pre and post monitoring of initiative Motorists - No significant cost implications Other (Police Scotland) - significant costs in enforcing of speed limits.

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

See previous comments

## 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)

**Please explain the reasons for your response**

This proposal would affect all parties uniformly.

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

N/A

## 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

## 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?

See previous comments