Dear Mr Ruskell

I am writing in response to thee consultation on 20MPH limits for Scotland.  I wish my response to be treated as anonymous.   I object to the plans for the following reasons:

      Speed limits are at their most effective when they are apropriate to the road conditions and broadly equate to the speed a responsible driver would choose based on what the can see through his windscreen.  Moving away from this has been shown time and again to damage respect for the vital road safety tool that speed limits should be and reduce compliance, not just on the road in question, but of limits in general.  This is why, time and again studies have shown that setting limits using the 85th percentile method maximises safety and saves lives.  Sadly the 85th percentile method was dropped a few  years ago due mainly to pressure from inexpert and frankly hysterical pressure groups who are not really interested in the science behind setting limits to maximise saving of life.

20 limits have their place (as should 10,15 and 25MPH limits, there are no 'magic numbers').  It is the blanket nature of any limit that is the problem.  Existing 30mph limits cover a variety of areas, from wide roads with few parked cars, wide grass verges and excellent visibility of potential hazards down to narrow roads full of parked cars and front doors opening straingt onto the pavement.  Clearly the idea that one limit is appropriate for all these areas is frankly bonkers, be it 30 MPH or 20MPH.  Limits must reflect the hazard density.

The most important thing a speed limit can achieve is to warn drivers that they are entering a hazardous area.  By making them blanket we destroy that most important aspect.

Drivers need to be concentrating on the road ahead, looking for hazards and adjusting speed to suit.  When they do this correctly they should never find themselves outside the law.  A good driver can achieve this with no recourse to the speedometer.  When you reduce speeds below the speed a responisble driver would naturally choose you create a greater need to continually check the speedometer.  This is time not looking at the road, time for a child to run out.  With increased enforcement this effect is amplified multifold.

When drivers are forced to drive at a speed well below the natural and safe speed for a road, their mind drifts.  They start thinking of other things to do.   The temptation to play with in car enteryainment, make a call or even text is increased.

Much of the evidence for 'success' used by campaigners comes from sites where 20 is a good choice, where road conditions dictate 20 to be correct.  Of course at such sites (where most 20 limits were sited in the early days)  they can show success, though I have yet to see dramatic results when one takes into account other measures often put in at the same time and improvements to car design.  Outside of these areas the opposite can often be true.  This backs up my earlier points entirely.

It may seem obvious to the layman that lower limits save lives.  Most campaignrs have not studied the subject, they just use emotive arguments.  To adopt such practices on flimsy arguments may seem the right thing to do.  It must be reemembered that such meeasures can increase as well as decrease casualties.  Science must take priority over emotion in such matters

Kind regards