**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.)

**3. 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 If you choose the second or third option, a name is still required, but it will not be published.**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:** Dumfries and Galloway Council

**4. 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:**

Steven Herriott

Head of Infrastructure and Transportation

Email:

**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 Council’s Priorities and Commitments for Development within the Council Plan and Directorate Business Plans were agreed at the 27th June 2017 meeting of Full Council. This includes a commitment to “Increase the number of roads with 20mph speed limits and zones to enable greater on-road cycling and create a safer environment for all road users, and within residential areas in our towns and villages.”

The underlying purpose of 20mph speed limits is to reduce the number of injury accidents on relevant roads, or if accidents do occur then to reduce the severity of them, by reducing the actual speed of traffic to 20mph or less. The proposed Bill may not achieve this to a significant extent. The objective it seeks to achieve is supported but the proposal may be an ineffective way of achieving it.

**2. 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.**

By increasing resource allocations to permit greater progress in delivering 20mph speed limits in line with current national guidance, and therefore introducing 20mph speed limited roads where traffic travels at or near that speed. This would minimise the need for Police enforcement activity, when they do not have the resources available to undertake such activity and probably reduce the extent of campaigning and advertising required for the proposal.

Alternatively, by supporting Intelligent Speed Adaptation (ISA), which would increase compliance levels with all speed limits, and therefore reduce accident and casualty numbers across the whole country and on all roads. As included in Annex 2 of the Road Safety Framework Mid Term Review March 2016.

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

The proportion of relevant roads that were subject to a 20mph speed limit would increase significantly, compared to the present situation.

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

Significant cost would be incurred but possibly at the risk of not achieving the reduction in actual vehicle speed that will bring about the benefits sought, which relate to vehicles travelling at or less than 20mph.

A tremendous peak workload for Roads Authorities who have limited resources in this area, as seemingly reflected in the limited and varied progress being made in introducing 20mph speed limits that significantly reduce vehicle speeds. To resource this within existing staff resources would take resources away from other areas of responsibility with consequent effects on, for example, road safety and road condition.

There would still be two different speed limits (30mph and 20mph) applying on urban/residential roads, so the suggested easing of driver understanding/removal of driver confusion seems doubtful. Some urban locations obviously also have 40, or indeed, 50mph speed limits.

**5. 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.)**

A significant and on-going promotional campaign, perhaps along the lines of the past campaigns for seat belt use. Additionally local campaigns to change attitudes and mindsets, working with communities at a more localised level.

Extensive police enforcement activity would be required to maximise compliance, if roads where speeds are currently high are included without engineering measures to reduce speeds.

**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.**

(a) the Scottish Government.

It is considered there will be a significant cost in relation to: progressing the Bill through Parliament; promotional campaigns over a long time period; the required increase in Police Scotland enforcement activity; and funding support to Local Authorities with regard to the significant assessment, implementation and subsequent campaign and promotion workloads.

(b) Local authorities

It is considered that there will be a significant cost with regard to the significant assessment and implementation and subsequent campaign and promotion workloads that would be required by Roads Authorities, particularly set against current reductions in funding and staff resources, including the loss of experienced staff.

Even if an authority were not to undertake any assessment of its road network and simply accept that all restricted roads were to change from 30mph to 20mph there would be significant costs in terms of: physical sign and road marking changes; promoting traffic Orders for lengths of restricted roads that have a current 30mph speed limit Order because they do not have a system of carriageway lighting; and the peak staff resource requirement to manage the overall process. Particularly bearing in mind that the change from 30mph to 20mph would happen overnight across the whole country.

If an authority were to assess its whole 30mph speed limited network to determine suitability or otherwise for roads to be limited to 20mph then there would be additional costs with regard to undertaking that review, for example undertaking speed measurements to determine actual speeds on relevant roads across its network and reviewing those and obtaining agreement to proposals through Council committee processes.

Subsequent to implementation there would be costs with regard to promotion and campaigns to change mindsets and maintain any early benefits. There also seems likely to be an increased number of complaints to local roads authorities about excessive speed, disregard of the signed speed limit and calls for traffic calming works to be put in place to physically reduce speeds. There would also potentially be a cost with subsequent monitoring activity to determine the level of compliance and perhaps to assist with focusing enforcement activity.

Potentially costs to remove existing traffic calming measures.

The lack of funding and resources to bring about this change is reflected in the variable progress made by authorities to implement 20mph speed limits at present, when the implementation progress can reflect available resources.

(c) Motorists

It is considered that overall there may be some increase in cost. This is in relation to a potential for increased fuel costs, relating to possibly more inefficient use of engines and longer journey times. Set against this is that there may be some reduction in costs arising from less vehicle use/increased walking and cycling activities, i.e. a degree of modal shift.

(d) Other road users and members of the public

It is considered there will be a significant cost to other road users and members of the public as tax payers.

Given the huge issues with regard to implementing such a change there would potentially be a reduction of activity across other areas of a Roads Authority’s responsibilities and a reduction in service to the public. Council funding could potentially also be diverted from other activities which would be delivering some of the same objectives, such as the enablement and encouragement of active travel.

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

It is considered there will be a significant cost for Police Scotland with regard to enforcement activity. This assumes that there would be a desire within Scottish Government for the benefits of lower speeds to be realised by actual significant reductions in speeds.

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

No more than stated in the consultation document, if vehicle speeds are reduced.

**Equalities**

**8. 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 wider introduction of 20mph speed limits should have a positive impact on equality with regard to age and disability, if there is an actual associated reduction in vehicle speeds. This would be by virtue of the increased ability to move around more safely and with reduced conflict and to be able to do so without requiring a motor vehicle.

It would also have a positive impact with regard to broader social inequality – by moving towards a society where active travel and public transport is given greater weight, and there is less focus on catering for motorised travel.

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

Not aware of potential negative impacts with respect to equality.

**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.**

The case with regard to emissions and whether or not there would be a reduction seems unclear. It also seems likely to be lost with the proposed more general move to electric vehicles.

The need for continuing promotional and enforcement activity would have a long term economic impact.

**General**

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

The underlying purpose of 20mph speed limits is to reduce vehicle speeds so that the number of road accidents resulting in casualties is reduced and that the severity of those casualties is reduced. Lower vehicle speeds will also enable and encourage greater active travel and a modal change away from motorised travel. These desired changes are supported but will only be effectively brought about if there is an actual significant reduction in vehicle speeds.

There also needs to be support from drivers and that will only be achieved by having measures in place that are understood and self-evidently appropriate.

Therefore the proposals as they stand may not go far enough. A more holistic approach needs to be considered that brings about a reduction in vehicle speeds and that the public support and understand, but does so in a way that does not create future issues for Roads Authorities or Police Scotland.

Notwithstanding the above comments, achieving these objectives at present is best achieved by delivery of 20mph speed limits in line with current national guidance and a focus on where they are most effective and where they are sought by local communities. The rate of delivery of these could be increased but would require specific funding to enable appropriate staff resource allocation.

This response was agreed at the 12th September 2017 meeting of Dumfries and Galloway Council’s Economy, Environment and Infrastructure Committee.