**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 is obviously supportive of any measures that can make Scottish roads safer for users. It is also broadly acceptant of the intention to make it simpler and less expensive for roads authorities to introduce 20 mph limits. It is very concerned however that a one size fits all approach appears to being adopted to this important aspect.

More rural authorities with only smaller towns and villages do not, thankfully, have the same accident issues as larger towns and cities. For many rural authorities the vast majority of accidents are on national speed limit rural roads and in-town casualty levels make it impossible to draw statistical significant projections regarding casualty reductions through a lesser speed limit. These authorities must be afforded the opportunity to apply road safety measures that are proportionate and appropriate for their specific needs.

Although there is, in parts, some sound arguments made in the paper it does tend to let itself down at times by putting forward unbalanced and selective information as well as discussing aspects out of context. There are also sections where the arguments put forward appear to be at odds with other established research. Of particular concern is that the cost implications associated with the proposals have not been properly understood or explored. In practice it will introduce significant set-up costs and additional ongoing revenue costs with new signs and poles required at every single unclassified side road that meets the A and B classified network.

**Selective Information** On page 4, for example, it is suggested that a reduction in speed of around 6 mph could be expected before then going on to discuss how accidents could be expected to fall by between 4% & 6% for each 1 mph reduction in average speed. Yet later in another section it notes that average speeds in Calderdale, West Yorkshire only reduced by 2.2 mph. This is in line with evaluation in Edinburgh which found that with a change in speed limit alone only lowered average speeds by 1.9 mph.

**Out of context discussion** Again on Page 4 the document discusses the number of accidents on built up roads, detailing the number categorised as fatal or serious. It then links this, in the next sentence to information in relation to contributory factors quoting that “travelling too fast for the conditions” or “exceeding the speed limit” were reported in 11% of all reported accidents and 19% of all fatal accidents. This latter data however refers to accidents on both built up and non-built up roads. As speed is known to be a common factor in rural road accidents it is probable that a larger proportion of the 11% and 19% quoted are attributable to those roads and the figures on built up roads should be much lower.

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**Conflicting Research** The paper suggests that there will less wear and tear on vehicles at 20 mph, but this is contrary to most schools of thought on the subject which suggest that greater stress will be placed on engines because they will be in lower gears for longer periods of time.

**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.**

Self explanatory

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

The proposal would introduce economies of scale and simplify the process for those authorities looking to introduce wide scale amendments to their 20 mph portfolio. It is not clear however, how many authorities are in that position.

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

* As classified through routes are intended to remain as 30 mph every single street off these will require to be signed with 20 mph / 30 mph signs back to back at enormous resource and significant cost to local authorities. Not to mention the sign clutter this would introduce. This fact seems to have been totally missed by the proposal.
* At the moment 30 mph limits do not require repeater signs but if 20 mph became the default this would presumably change and all routes that remain at 30 mph would require to have repeater signs erected at regular intervals.
* Existing research suggests that without physical accompanying measures the reduction in speed from changing 30 mph limits to 20 mph will be minimal (less than 2 mph in Edinburgh). Wide scale physical measures are unaffordable for smaller authorities.
* It is well established that the wider road safety measures are introduced the more diluted their impact becomes. This is the primary reason that SBC, and a number of other authorities, have restricted the use of 20 mph limits to the vicinity of schools and key travel to school routes where they are most needed and can potentially have the greatest impact. The link to the school journey is made clear and is generally well understood; and for those reasons the 20 mph limits are currently well observed in the main.

It is feared that the wider scale introduction of 20 mph limits may diminish compliance levels and therefore threatens to raise the speeds at the very locations where such measures are most necessary.

**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.)**

For any level of compliance to be effective on the type of roads this is to be applied on there would need to be wide spread acceptance of the philosophy of 20 mph limits and self-compliance. Police Scotland is unlikely to be in a position to offer any level of enforcement on residential streets.

**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.**

(b) As outlined above in the response to Q4 the proposal has major implications for new signage.

(c) Increased running costs at lower speeds and increased maintenance requirements. For businesses the increased journey times may have a significant impact on their operational effectiveness and viability.

(e) May be some cost associated with lower-speed driving and longer driving times for non-blue-light driving.

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

Paper discusses the potential benefits in some detail. Nothing to add.

**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.**

Overall it is difficult to anticipate any of the protected characteristics being directly impacted to any significance by the proposals.

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

n/a

**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.**

Do not believe that local authorities could deliver within existing staff resources or funding.

**General**

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

There are definite road safety, environmental and amenity benefits to be achieved by introducing 20 mph limits in the appropriate location. The benefits of a much wider introduction of them are however much less proven. It is particularly interesting to note that a number of authorities, that were previously very supportive of area-wide 20 mph limits, have started to question the validity of such schemes following ongoing evaluation of established schemes.

Of particular concern with this proposal is the apparent assumption of a one-size-fits all approach without differentiating between urban and rural environments.

The assumption that erecting signs will be sufficient to slow all drivers is flawed. Without significant government spend on engineering measures (which are unlikely to be universally welcomed), studies have illustrated that only nominal benefits will be achieved in terms of speed reduction.

There are many existing barriers, stopping children walking or cycling to school, that are unrelated to existing traffic levels and pertaining speeds. The most obvious example is that drop-offs often form an integral part of the parent work-journey. It is unrealistic to expect a significant shift to walking and cycling purely due to minimal speed reductions.