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 If you choose the second or third option, a name is still required, but it will not be published.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

Fully 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

The Council is fully supportive of the universal introduction of lower (20mph) speed limits in urban/built-up areas for the social and community benefits (and the health benefits that arise from these), and in recognition that there will likely be some accident reduction savings.

# 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

It is possible that similar benefits could be realised by introducing greater flexibility/ less restrictive requirements into how 20mph speed zones and limits can be implemented in areas with a mix of compliant and non-compliant streets.

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

The social and community benefits that have been linked to lower passing vehicle speeds would lead to health benefits through increased levels of walking, cycling, and leisure activity in our urban and built-up areas. This change is perhaps the most significant, but will take time to realise as it involves a behavioural/cultural step-change.

While it has been proven that any reduction in vehicle emissions has both environmental and health benefits; what is less clear is to what extent total vehicle emissions are reduced in practice through the implementation of wide area 20mph speed limits/ zones. Various independent test reports would seem to indicate that there is a wide range of emissions outcomes, which depend not only on the fuel type but also on engine size, age of vehicle, driving style, and the individual route characteristics.

Therefore, while there may be environmental and health benefits accruing from reduced emissions by implementing lower speed zones in our area the level of any benefit/ advantage is unclear.

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

While the speed reduction measure is intended to reduce overall accident rates in urban areas the stated savings are unlikely to be realised. This is because a high percentage of urban accidents occur along the main/ arterial routes that are likely to be retained at higher limits for traffic flow reasons.

There is also the cost factor; the financial impacts of implementing a default 20mph speed limit in urban and built-up areas depends entirely on how it is done. At the very least there will be unavoidable, and not insignificant, costs to change all of the existing 30mph speed plates to 20mph ones. As most of our 30 limits also have gateway treatments these will have to be re-marked. While not necessarily required, there will also be a cost in removing 20mph limit signs and poles where they have become redundant.

As it is also likely that it will be desirable for some main/ arterial routes and roads to be retained with 30mph speed limits there will be costs associated with the new traffic regulation orders and associated signage for those sections. While small in number these sections are likely to require a significant amount of signage for side roads, which will now be 20mph areas.

There is also the question of how the 20mph speeds are to be enforced. A great many of the roads that will be covered by a reduced limit drive 'naturally' at a higher speed as they were not designed to current low-speed standards. As it is unlikely that Police Scotland will have the resources to cover the enforcement of urban roads where traffic speeds remain above 20mph, will the various Roads Authorities

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

be required to re-introduce higher limits, or implement traffic calming features to control the speeds? In either of these scenarios there will be significant costs involved. Any failure to adequately deal with such road links (one way or another) will dilute the effectiveness of the speed limit on other road links, thus further reducing the benefits intended by the lower default speed limit.

In summary; the main disadvantage of the proposals is the unknown level of cost and resources that will be required on implementation, and the possible costs associated with on-going management of the new speed regime as outline above.

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.

Advertising signage and publicity campaigns alone have been shown to have no lasting effect without a significant and prolonged enforcement effort by the Police.

Even then, effecting such a significant change in driver/ public attitudes will take at least a generation - as amply demonstrated by the campaign(s) against drink driving.

## 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
Scottish Government			Х			
Local Authorities	Х					
Motorists			Х			
Other						Х
Police Scotland						

Please explain the reasons for your response

See previous comments regarding disadvantages.

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

No Response

# 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?

Positive

#### Please explain the reasons for your response

Reduced vehicle speeds have undoubted benefits for all vulnerable road users and specifically children and young persons, the elderly, pregnant and nursing women, and those with mobility issues.

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

Have not identified any negative impacts.

# 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

#### Please explain the reasons for your response:

See previous comments regarding implementation and on-going management costs, also level of any environmental benefits not clear.

### 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?

There are significant concerns over the initial costs of implementing such a change and the ongoing cost of managing vehicle speeds where the new lower limit is not being adhered to.

Revised guidance and greater flexibility/ less restrictive requirements into how 20mph speed zones and limits can be implemented in areas with a mix of compliant and non-compliant streets would allow local authorities to target areas of concern in a more practical manner but with reduced costs.