FINANCE AND CONSTITUTION COMMITTEE

The Restricted Roads (20 mph Speed Limit) (Scotland) Bill

Consultation

1. Did you take part in any consultation exercise preceding the Bill and, if so, did you comment on the financial assumptions made? Yes and Yes

2. If applicable, do you believe your comments on the financial assumptions have been accurately reflected in the FM? Yes, except that the pollution reduction and active travel increases were not included in the benefits. Also the benefits are more likely to be a 15% reduction in casualties not a 5% or 10% reduction.

3. Did you have sufficient time to contribute to the consultation exercise? Yes

Costs

4. If the Bill has any financial implications for your organisation, do you believe that they have been accurately reflected in the FM? If not, please provide details,

Implications for 20’s Plenty for Us are positive.

5. Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate? No because the casualty reductions will be greater – at least 15% reduced not 5% or 10% (Edinburgh for instance were reporting early benefits of 24% fewer casualties). The benefits are understated.

Also they don’t include the health economic savings of additional active travel which are huge.

Nor do they include the health benefits of reduced air pollution or reduced noise pollution
20’s Plenty for Us calculated costs and savings at http://www.20splenty.org/20_scotland_options

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<td>Casualties pa on 30mph roads (base is 2011-2015 ave)</td>
<td>49 deaths, 823 serious, 5,410 slight 6,282 total</td>
<td>Casualties saved 7 deaths, 123 serious, 812 slight, 942 total</td>
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<td>Casualty £ pa</td>
<td>£267M cost</td>
<td>£56M saving</td>
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<td>Activity Cost/ Benefits</td>
<td>Health costs of inactivity. This is currently estimated at £1,153M pa based on Public Health England stats for the Scottish population</td>
<td>Assuming a very conservative effect of reducing this by 1% over the whole population the saving is £11M pa or £55M over 5 years</td>
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Jones and Brunt of Public Health Wales conclude

The evidence presented here suggests a national 20 mph limit would substantially reduce road traffic casualties and, at worst, would not lead to a direct change in air pollution. Indirectly, if people are encouraged to switch to active travel, there are likely to be greater reductions in air pollution. The health and cost savings of the approach are likely to be substantial and although the costs of implementation are not accounted for here, they are likely to be far lower than the benefits.

The Journal of Epidemiology & Community Health, Twenty miles per hour speed limits: a sustainable solution to public health problems in Wales, Sarah J Jones, Huw Brunt, Mar 23, 2017, with permission from BMJ Publishing Group Ltd  http://jech.bmj.com/content/early/2017/03/23/jech-2016-208859.full


OUR POSITION Public Health Wales believes that lowering of the default speed limit to 20mph, from the current 30mph, in Wales would save lives and reduce injuries. The extent of this saving is sufficient to justify this change. However, there are also likely to be benefits in terms of reduced noise and safer and more cohesive communities that are more pleasant to live in. People are also likely to be encouraged to walk or cycle more. This is supported by evidence that the majority of the public would welcome greater use of 20mph speed limits. The
evidence suggests the potential for a wide range of public health benefits and few, if any, negative effects.

WHAT ARE THE PUBLIC HEALTH BENEFITS?

There appear to be public health benefits of default 20mph speed limits in terms of reductions in road traffic crashes (up to 54%), casualties (20% to 56%), casualties in the most deprived areas (26% to 34%) and cyclist casualties (40%). There also appear to be reductions in noise pollution of 1.7 to 3db. Public support for 20mph speed limits is around 75% and a default speed limit of 20mph would also deliver on all seven goals of the Wellbeing of Future Generations Act.

There is also some evidence that a default 20mph speed limit would increase local business viability and social coherence, reduce community severance, improve air quality by avoiding acceleration and braking, as well as increase walking and cycling. There is also some suggestion of reductions in inequalities and minimal effects on travel times.

6. If applicable, are you content that your organisation can meet any financial costs that it might incur as a result of the Bill? If not, how do you think these costs should be met? Yes we can meet them

7. Does the FM accurately reflect the margins of uncertainty associated with the Bill’s estimated costs and with the timescales over which they would be expected to arise? Yes though it didn’t try to cost active travel or pollution benefit

Wider Issues

8. Do you believe that the FM reasonably captures any costs associated with the Bill? If not, which other costs might be incurred and by whom? Yes it captures them and shows a high benefit ratio

9. Do you believe that there may be future costs associated with the Bill, for example through subordinate legislation? If so, is it possible to quantify these costs? No

See below comments on the Financial Memorandum itself.
**Finance and Constitution Committee Questionnaire**

**Para 21**

This table uses information from the DfT report on speed limit compliance on “free-flowing” roads. For the 20mph results it included just 8 sites across the whole of the UK which were specifically chosen for being devoid of any hazards which could alert the driver to the particular speed limit. Most were not on residential roads and the DfT report stated that they were not typical of most 20mph roads. Hence it would be wrong to extrapolate these findings to all urban roads which would be expected to have a 20mph limit set. Paras 22 to 25 will therefore over-estimate the extent of speeding on 20mph roads.

**Para 26**

Avon and Somerset Police have developed a successful enforcement of 20mph limits by using Speed Awareness Courses as a complement to Fixed Penalty Notices for first time offenders. These have the benefits of:-

- Enabling education and awareness of the benefits of 20mph limits in the course.
- A redistribution of £40 of the course fee back to the police to fund enforcement.
- An opportunity for local Road Safety Teams to run the courses with an income from attendees.
- Driver preference to avoid a Fixed Penalty Notice.

In rolling out a national 20mph limit then there would ample scope to adopt such initiatives that would combine enforcement with speed awareness courses and education.

This would impact on and reduce the court costs as most 20mph non-compliance offences would be self-funding and not reach the courts. Hence this would reduce the costs in paras 27-29.

Note that there is also the possibility for police to delegate enforcement to local authorities or other agencies. This is detailed on a 20’s Plenty briefing sheet at [http://www.20splenty.org/how_las_can_enforce](http://www.20splenty.org/how_las_can_enforce)

**Para 32**

Instead of replacing 30mph signs with 20mph, it may be possible to use decals which would cover the 30 numerals on current signs. This would make considerable savings in costs.

**Para 35**
The use of repeater signs is a UK specific intervention where a speed other than the “national speed limit” is in use. However, other countries do not use such repeaters relying merely on gateway or transition signs. Where they do use repeater signs it is often at far greater intervals than the UKs 100m. For example, in New York State the distance between 20mph signs is 600m.

Where there is an exception from the national speed limit where the exception is lower (ie currently 20mph in a national 30mph limit), there may be a case for emphasising the exceptional limit with repeaters. But where the exception is 30mph in a national 20mph limit there is less of a case for repeater signs. The problem with a driver mistakenly assuming that they are in a 20mph road when the actual limit is 30mph is far less critical than where the driver mistakenly assumes the limit is 30mph when the actual limit is 20mph.

Given that highway authorities do have discretion on the use and frequency of repeater signs, there is a case for their use no longer being prescribed. Current repeater signs in 20mph limits could therefore be maintained without issue.

In any case, there will be a requirement for clarification of the TSRGD which currently states that the national limit for restricted roads is 30mph. Any clarification which could de-prioritise or deprescribe the use of repeater signs would make considerable savings in 35 to 42.

Other savings

Where the speed limit is 20mph or less the TSRGD does not require many hazard signs to be lit. Some may not be required at all. This would provide ongoing savings.

There is also a case for removing central white line markings where the speed limit is 20mph. A trial by Transport for London found a statistically significant reduction in speed of between 5.4mph and 8.6mph as a result of removing central markings. See http://roadsafetygb.org.uk/news/removing-white-lines-can-reduce-speeds-tfl-3817/

This also reduces ongoing road maintenance costs.