Do you support the proposed reduction in the default speed limit on most urban and residential streets in Scotland from 30mph to 20mph?

Yes

Do you think reducing the default speed limit on most urban and residential streets would enhance road safety?

Highland Council is of the view that a reduction in the default speed limit on appropriate urban and residential streets will have a positive impact on road safety, in particular with regards to vulnerable road users including children, cyclists, elderly and the disabled and go a long way to achieving the national road casualty reduction targets. Research tells us that the number and severity of collisions significantly decreases with a reduction in vehicle speeds.

A 2010 Department for Transport (Dft) publication which looked at the relationship between speed and risk of fatal injury found that the risk of fatal injury to pedestrians rose from under 1% at an impact speed of 20mph to 5.5% (1 in 20) at 30mph and over 30% at an impact speed of 40mph

A 2000 TRL report ‘The effects of drivers’ speed on the frequency or road accidents’ states that on the types of urban road likely to be considered for a 20mph limit the study found the accidents could be expected to fall by between 4% and 6% for each 1mph reduction in average speed

In the RoSPA factsheet re 20mph speed limits they look at the risk of pedestrian injury v vehicle speed as can be seen by the table below which shows a clear correlation between vehicle speed and collision severity:
RoSPA’s policy position on the implementation of 20mph speed limits is as follows:

20mph zones are very effective at preventing injuries and RoSPA would like to see their wider use in residential areas.

In addition to this we feel this reduction in the speed limit will generate a positive impact within communities with regards to active and sustainable travel and encouraging, where appropriate, streets to be used for play, therefore having an impact on the national health and wellbeing.

The DfT recently published their report on their 20mph Research Study (Nov 2018) (https://www.gov.uk/government/publications/20-mph-speed-limits-on-roads) The report concludes that; the method of application of a scheme, the characteristics of the road network along with publicity and educational programmes are all important contributing factors in securing speed reduction.

Highland Council believes that application of the Bill should be at the discretion of the Local Authority to ensure the new lower limit is implemented on appropriate streets, for instance not on rural 30mph limits or some urban distributor roads. In the Highlands such examples are Old Evanton Road in Dingwall, B9006 in Inverness and B9090 in Nairnshire, where 20mph would be inappropriate on the majority of the road lengths due to their characteristics and strategic role in the transportation network.

**Do you think reducing the default speed limit on most urban and residential streets would have a positive or negative impact on you or your organisation?**

Positive.

- Casualty Reduction as it makes the environment safer for all and in particular vulnerable road users.
• Reduction in unnecessary traffic on urban residential streets.
• Increase active travel/walking/cycling/exercise.
• Reduction in fuel usage as a reduction in speed limit creates better traffic flows. Highland Council as one of the largest vehicle fleets in Scotland so this will result in cost savings.
• Modal shift encouraging public transport use.
• Creation of family friendly residential areas/spaces.
• Smoothing and improvement of traffic flows.

If the Bill is passed, should its roll-out be accompanied by a national awareness campaign

Yes.

The key to any change to the road environment is public awareness. If there is to be a real reduction in actual vehicle speeds it is imperative that there is a high profile public campaign to increase public understanding for the reasons for the introduction of the lower speed limit and the likelihood of public compliance for the new reduced limit. Awareness raising is the key as can be seen by its inclusion in the fundamental principles of Road Safety namely: Engineering, Education, Evaluation and Encouragement.

It is important that this is a sustained awareness campaign. National sustained campaigns have previously proved to be a successful approach in terms of raising public awareness for Road Safety campaigning. As an example of the time frames that can be involved and should be allowed for, it took approximately 20 years for drink driving to become socially unacceptable. From recent statistics, both speeding and inappropriate speeding for the road conditions, feature highly, thus making speeding socially unacceptable is an important long term road safety goal. The introduction of 20mph limits in built up areas in conjunction with an awareness raising campaign that champions positive reinforcement is key to the Bill’s success.

Should Police Scotland be required to take additional enforcement action, over and above that used to enforce the current 30mph limit, following the introduction of a 20mph limit on most urban residential streets in Scotland?

There would be a requirement that an appropriate level of enforcement is undertaken. It is considered that the nature and level of the enforcement should be agreed at a local level by the Road Safety Partnerships, of which Police Scotland are a lead member.

Local Authorities should design schemes in accordance with the Traffic Signs Regulations and General Directions 2016 and Transport Scotland’s Good Practice Guidance on the implementation of 20mph speed restrictions to ensure that the limits
implemented are designed to ensure they are self-enforcing and thus there will be no requirement for Police Scotland to undertake any additional enforcement. The public awareness raising campaign will also be a key part in terms of public compliance.

In car technology could present an opportunity to assist with the self-enforcement of the new reduced limits e.g. the use of in car data etc. There have been various areas of research undertaken to date, both by Roads safety organisations and vehicle manufactures. As the application of technology as an aid to road safety is still very much in development, it is recommended that further national research and assessment is undertaken to identify acceptable opportunities.

If the Bill is agreed, how long should local authorities be given to complete the roll-out of the new 20mph limit?

Up to 5 years.

Local Authorities will require time to develop programmes without putting undue pressure on resources. Our initial assessment (for Highland) identifies over 800 km of 30mph limit roads all of which would require assessment. Across the Highlands there are over 100 30mph traffic regulation orders. Additionally there are extensive lengths of road where in accordance with paras 81 & 82 of the Road Traffic Regulation Act 1984 30mph limits apply.

To manage the additional work and ensure delivery within a 5 year time scale would require recruitment of additional officers and allocation of funding. It is estimated that to ensure implementation of speed limits in line with the Good Practice Guidance would require 2 FTE for the period.

The issue of Traffic Order advertising and introduction will require to be addressed e.g. a switch to advertising on the Governments Webpages as opposed to the current costly newspaper advertising system that is in place.

Changes to road signage infrastructure would also be required, to replace 30mph signage with 20mph signage. Again the cost of this work would need to be funded.

Highland therefore consider that the Bill would need to make allowance for the provision of funding to enable local authorities to implement the requirements of the Bill.

Other comments:

It is also considered that the Bill might have on the following impacts:
Human Rights – the protection of vulnerable road users is paramount in the purpose of this Bill.

Sustainable Development – will create safer/active travel promoting areas

Island, rural or remote communities – implementing the limits on a community by community basis on the appropriate streets will enhance road safety, active travel and friendlier residential areas across the country.